

# Internal Audit Check List

## MANAGEMENT REVIEW

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Audit Date	3-12-19	Auditor Helen Lamb	

## SCOPE

Company / ISO Section	Criteria of ISO Section	Auditor Comments / Issues
VST Ltd ISO9001:2015 10.3	<b>Continual improvement</b> The organization shall continually improve the suitability, adequacy and effectiveness of the quality management system. The organization shall consider the results of analysis and evaluation, and the outputs from management review, to determine if there are needs or opportunities that shall be addressed as part of continual improvement.	Issues Regular Review + management meetings
VST Ltd ISO9001:2015 4.1	<b>Understanding the organization and its context</b> The organization shall determine external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended result(s) of its quality management system. The organization shall monitor and review information about these external and internal issues. NOTE 1 Issues can include positive and negative factors or conditions for consideration. NOTE 2 Understanding the external context can be facilitated by considering issues arising from legal, technological, competitive, market, cultural, social and economic environments, whether international, national, regional or local. NOTE 3 Understanding the internal context can be facilitated by considering issues related to values, culture, knowledge and performance of the organization.	Marketing Jobs list Issues R+D Research feedback in the status - check we cover all this
VST Ltd ISO9001:2015 4.2	<b>Understanding the needs and expectations of interested parties</b> Due to their effect or potential effect on the organization's ability to consistently provide products and services that meet customer and applicable statutory and regulatory requirements, the organization shall determine:	



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	<p>a) the interested parties that are relevant to the quality management system;</p> <p>b) the requirements of these interested parties that are relevant to the quality management system.</p> <p>The organization shall monitor and review information about these interested parties and their relevant requirements.</p>	10 breakfasts
VST Ltd ISO9001:2015 4.3	<p><b>Determining the scope of the quality management system</b></p> <p>The organization shall determine the boundaries and applicability of the quality management system to establish its scope.</p> <p>When determining this scope, the organization shall consider:</p> <p>a) the external and internal issues referred to in 4.1;</p> <p>b) the requirements of relevant interested parties referred to in 4.2;</p> <p>c) the products and services of the organization.</p> <p>The organization shall apply all the requirements of this International Standard if they are applicable within the determined scope of its quality management system.</p> <p>The scope of the organization's quality management system shall be available and be maintained as documented information. The scope shall state the types of products and services covered, and provide justification for any requirement of this International Standard that the organization determines is not applicable to the scope of its quality management system.</p> <p>Conformity to this International Standard may only be claimed if the requirements determined as not being applicable do not affect the organization's ability or responsibility to ensure the conformity of its products and services and the enhancement of customer satisfaction.</p>	10 breakfasts Response. Issues + key features
VST Ltd ISO9001:2015 5.1.1	<p><b>General</b></p> <p>Top management shall demonstrate leadership and commitment with respect to the quality management system by:</p> <p>a) taking accountability for the effectiveness of the quality management system;</p> <p>b) ensuring that the quality policy and quality objectives are established for the quality management system and are compatible with the context and strategic direction of the organization;</p> <p>c) ensuring the integration of the quality management system requirements into the organization's business processes;</p>	Management Review. Issues



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	<p>d) promoting the use of the process approach and risk-based thinking;</p> <p>e) ensuring that the resources needed for the quality management system are available;</p> <p>f) communicating the importance of effective quality management and of conforming to the quality management system requirements;</p> <p>g) ensuring that the quality management system achieves its intended results;</p> <p>h) engaging, directing and supporting persons to contribute to the effectiveness of the quality management system;</p> <p>i) promoting improvement;</p> <p>j) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.</p> <p>NOTE Reference to "business" in this International Standard can be interpreted broadly to mean those activities that are core to the purposes of the organization's existence, whether the organization is public, private, for profit or not for profit.</p>	<p>Risks + Response.</p> <p>Issues + feedback</p> <p>metrics</p>
VST Ltd ISO9001:2015 6.1	<p>When planning for the quality management system, the organization shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and determine the risks and opportunities that need to be addressed to:</p> <p>a) give assurance that the quality management system can achieve its intended result(s);</p> <p>b) enhance desirable effects;</p> <p>c) prevent, or reduce, undesired effects;</p> <p>d) achieve improvement.</p>	<p>Risk assessments</p> <p>Risks + Resp.</p> <p>Industries.</p>
VST Ltd ISO9001:2015 6.1.2	<p>The organization shall plan:</p> <p>a) actions to address these risks and opportunities;</p> <p>b) how to:</p> <p>1) integrate and implement the actions into its quality management system processes (see 4.4);</p> <p>2) evaluate the effectiveness of these actions.</p>	<p>Issues.</p> <p>Management Review</p>



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	<p>Actions taken to address risks and opportunities shall be proportionate to the potential impact on the conformity of products and services.</p> <p>NOTE 1 Options to address risks can include avoiding risk, taking risk in order to pursue an opportunity, eliminating the risk source, changing the likelihood or consequences, sharing the risk, or retaining risk by informed decision.</p> <p>NOTE 2 Opportunities can lead to the adoption of new practices, launching new products, opening new markets, addressing new customers, building partnerships, using new technology and other desirable and viable possibilities to address the organization's or its customers' needs.</p>	
VST Ltd ISO9001:2015 7.1.1 General	<p><b>General</b></p> <p>The organization shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the quality management system.</p> <p>The organization shall consider:</p> <p>a) the capabilities of, and constraints on, existing internal resources;</p> <p>b) what needs to be obtained from external providers.</p>	<p>Reviewing issues Roles + Resp.</p>
VST Ltd ISO9001:2015 9.2.2	<p>The organization shall:</p> <p>a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of the processes concerned, changes affecting the organization, and the results of previous audits;</p> <p>b) define the audit criteria and scope for each audit;</p> <p>c) select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;</p> <p>d) ensure that the results of the audits are reported to relevant management;</p> <p>e) take appropriate correction and corrective actions without undue delay;</p> <p>f) retain documented information as evidence of the implementation of the audit programme and the audit results.</p> <p>NOTE See ISO 19011 for guidance.</p>	<p>Audit Calendar management Review Board meeting Doc index</p>



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VST Ltd ISO9001:2015 9.3.2	<b>Management review inputs</b> 9.3.2 Management review inputs The management review shall be planned and carried out taking into consideration: a) the status of actions from previous management reviews; b) changes in external and internal issues that are relevant to the quality management system; c) information on the performance and effectiveness of the quality management system, including trends in: 1) customer satisfaction and feedback from relevant interested parties; 2) the extent to which quality objectives have been met; 3) process performance and conformity of products and services; 4) nonconformities and corrective actions; 5) monitoring and measurement results; 6) audit results; 7) the performance of external providers; d) the adequacy of resources; e) the effectiveness of actions taken to address risks and opportunities (see 6.1); f) opportunities for improvement.	Issues + in-house.  Issues Training manager Records Doc index Staff Awareness
VST Ltd ISO9001:2015 9.3.3	<b>Management review outputs</b> The outputs of the management review shall include decisions and actions related to: a) opportunities for improvement; b) any need for changes to the quality management system; c) resource needs. The organization shall retain documented information as evidence of the results of management reviews.	meetings - management review
Viamed Ltd ISO13485:2016 4.1.1	<b>Quality management system</b> The organization shall document a quality management system and maintain its effectiveness in accordance with the requirements of this International Standard and applicable regulatory requirements. The organization shall establish, implement and maintain any requirement, procedure, activity or arrangement required to be documented by this International Standard or applicable regulatory	



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	<p>requirements.</p> <p>The organization shall document the role(s) undertaken by the organization under the applicable regulatory requirements.</p> <p>NOTE Roles undertaken by the organization can include manufacturer, authorized representative, importer or distributor.</p>	<i>Roles + Responsibilities</i>
<p>Viamed Ltd</p> <p>ISO13485:2016 4.1.3</p>	<p><b>Quality management system</b></p> <p>For each quality management system process, the organization shall:</p> <p>a) determine criteria and methods needed to ensure that both the operation and control of these processes are effective;</p> <p>b) ensure the availability of resources and information necessary to support the operation and monitoring of these processes;</p> <p>c) implement actions necessary to achieve planned results and maintain the effectiveness of these processes;</p> <p>d) monitor, measure as appropriate, and analyse these processes;</p> <p>e) establish and maintain records needed to demonstrate conformance to this International Standard and compliance with applicable regulatory requirements (see 4.2.5).</p>	<i>management reviews 1 hrs starts. 1st Dec index</i>
<p>Viamed Ltd</p> <p>ISO13485:2016 4.1.4</p>	<p><b>Quality management system</b></p> <p>For each quality management system process, the organization shall:</p> <p>The organization shall manage these quality management system processes in accordance with the requirements of this International Standard and applicable regulatory requirements. Changes to be made to these processes shall be:</p> <p>a) evaluated for their impact on the quality management system;</p> <p>b) evaluated for their impact on the medical devices produced under this quality management system</p> <p>c) controlled in accordance with the requirements of this International Standard and applicable regulatory requirements.</p>	<i>Regular Reviews Interests Blockade headings</i>
<p>Viamed Ltd</p> <p>ISO13485:2016 5.1</p>	<p><b>Management commitment</b></p> <p>Top management shall provide evidence of its commitment to the development and implementation of the quality management system and maintenance of its effectiveness by:</p>	



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	<p>a) communicating to the organization the importance of meeting customer as well as applicable regulatory requirements;</p> <p>b) establishing the quality policy;</p> <p>c) ensuring that quality objectives are established;</p> <p>d) conducting management reviews;</p> <p>e) ensuring the availability of resources.</p>	<p>Management Review tasks.</p>
<p>Viamed Ltd</p> <p>ISO13485:2016 5.3</p>	<p><b>Quality policy</b></p> <p>Top management shall ensure that the quality policy:</p> <p>a) is applicable to the purpose of the organization;</p> <p>b) includes a commitment to comply with requirements and to maintain the effectiveness of the quality management system;</p> <p>c) provides a framework for establishing and reviewing quality objectives;</p> <p>d) is communicated and understood within the organization;</p> <p>e) is reviewed for continuing suitability.</p>	<p>tasks.</p>
<p>Viamed Ltd</p> <p>ISO13485:2016 5.6.1</p>	<p><b>General</b></p> <p>The organization shall document procedures for management review. Top management shall review the organization's quality management system at documented planned intervals to ensure its continuing suitability, adequacy, and effectiveness. The review shall include assessing opportunities for improvement and the need for changes to the quality management system, including the quality policy and quality objectives.</p> <p>Records from management reviews shall be maintained</p>	<p>Issues + Audits Reliability tasks</p>
<p>Viamed Ltd</p> <p>ISO13485:2016 5.6.2</p> <p>Review input</p>	<p><b>General</b></p> <p>The input to management review shall include, but is not limited to, information arising from:</p> <p>a) feedback;</p> <p>b) complaint handling;</p> <p>c) reporting to regulatory authorities;</p> <p>d) audits;</p> <p>e) monitoring and measurement of processes;</p>	<p>Dec index tasks. Audits + Reviews.</p>



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	<p>f) monitoring and measurement of product;</p> <p>g) corrective action;</p> <p>h) preventive action;</p> <p>i) follow-up actions from previous management reviews;</p> <p>j) changes that could affect the quality management system;</p> <p>k) recommendations for improvement;</p> <p>l) applicable new or revised regulatory requirements.</p>	
<p>Viamed Ltd</p> <p>ISO13485:2016 5.6.3</p>	<p><b>Review output</b></p> <p>The output from management review shall be recorded (see 4.2.5) and include the input reviewed and any decisions and actions related to:</p> <p>a) improvement needed to maintain the suitability, adequacy, and effectiveness of the quality management system and its processes;</p> <p>b) improvement of product related to customer requirements;</p> <p>c) changes needed to respond to applicable new or revised regulatory requirements;</p> <p>d) resource needs.</p>	<p>Dec 2019 + Issues</p>
<p>Viamed Ltd</p> <p>ISO13485:2016 8.2.4</p>	<p><b>Internal audit</b></p> <p>The organization shall conduct internal audits at planned intervals to determine whether the quality management system:</p> <p>a) conforms to planned and documented arrangements, requirements of this International Standard, quality management system requirements established by the organization, and applicable regulatory requirements;</p> <p>b) is effectively implemented and maintained.</p> <p>The organization shall document a procedure to describe the responsibilities and requirements for planning and conducting audits and recording and reporting audit results.</p> <p>An audit program shall be planned, taking into consideration the status and importance of the processes and area to be audited, as well as the results of previous audits. The audit criteria, scope, interval and methods shall be defined and recorded (see 4.2.5). The selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work.</p>	<p>Management Review.</p> <p>Audit Calendar.</p> <p>Interlocks</p> <p>Dec index</p> <p>Management Review.</p>



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	Records of the audits and their results, including identification of the processes and areas audited and the conclusions, shall be maintained (see 4.2.5). The management responsible for the area being audited shall ensure that any necessary corrections and corrective actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities shall include the verification of the actions taken and the reporting of verification results. NOTE Further information can be found in ISO 19011.	Dec index 155425
Viamed Ltd ISO13485:2016 8.5.1	<b>General</b> The organization shall identify and implement any changes necessary to ensure and maintain the continued suitability, adequacy and effectiveness of the quality management system as well as medical device safety and performance through the use of the quality policy, quality objectives, audit results, postmarket surveillance, analysis of data, corrective actions, preventive actions and management review.	management Review

Extra Questions?

Question	Response	Y/N
Check the Review is carried out timely. Task 746 Meeting Minutes should be Attached to Latest Issue #	135684	Y
Verify that all relevant persons were present. See minutes at the bottom		Y



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Check that the review was carried out to the preset agenda. As per Vop 13	<i>Agenda checked</i>	<i>Y</i>
Is this agenda adequate? See any other business see if other sections should be added?		<i>Y</i>
Check that an action plan is generated from the review. Check Section g Recommendations or improvement, and if there any further linked issues to the primary issue.	<i>Follow on issues</i>	<i>Y</i>
Check that actions are completed in a timely manner.		<i>Y</i>
Are minutes retained from the review? Are the minutes attached to the issue		<i>Y</i>
Can these minutes be accessed readily?		<i>Y</i>



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### Sub Processes Linked to Audit 18

Review the below processes tasks and audits and ensure they are completed in a timely manner.

Share Holder

Process Scope	Brief Description	Responsibility/Procedure/Training	Measurable Objective	Task	Audit	Freq	Risk	Overall	Action
7834 - History/Details Shareholder review of the Financial position of the Companies	Financial Review	27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data	none - this is a subjective review by the share holders	733 Share Holder	769 Managing Director	3	1	3	Task 1M Audit 3M



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### Managing Director

Process Scope	Brief Description	Responsibility/Procedure/Training	Measurable Objective	Task	Audit	Freq	Risk	Overall	Action
22 - History/Details Ensure the company policy's are still current and upto date	Company Policy's	22684 VM3COP00.00 Viamed Quality Statement policy and objectives 27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data	document should be within its expiry date and reviewed yearly	300 Managing Director	✓	1	1	1	Task 12M
23 - History/Details Ensure the company Objects are still current and upto date	Company Objectives	22684 VM3COP00.00 Viamed Quality Statement policy and objectives 22062 VM3COP00.00 VST Quality Statement policy and objectives 27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data 22429 Viamed Top Level Quality Objectives		300 Managing Director	✓				Task 12M
26 - History/Details Overview of the Company using various data Reporting Screens	Company Resources	27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data	none - this is a subjective review by the Managing Director	114 Managing Director	✓	4	1	4	Task 1M
27 - History/Details To review and close all automatic rolling Issues. Including all rolling tasks and audits	Management Reviews And Quality Audits	16995 VM3COP27.17 Complete Auto_calendar Issues 27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data	Review the Management Review Rolling Issues page, ensure they are being reviewed monthly	290 Managing Director	✓	4	1	4	Task 1W Audit 6M
30 Responsibility of notifying MHRA	MHRA Licences And Notifications	27244 VOP 02 Personnel and Responsibility, Staff and Staffing				1	1	1	



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of product recalls, and registrations of products

Issues, Training, Roles and Tasks

31  
Notifying notified bodies if there are major changes to the QMS system,  
Or product recalls

Notified Body  
Notifications

27244 VOP 02 Personnel and Responsibility , Staff and Staffing Issues, Training, Roles and Tasks

1 1 1

32 - *History/Details*

MDALL Listings

Complete the CMDCAS Paperwork once per year to Keep the Licence to sell in canada

27244 VOP 02 Personnel and Responsibility , Staff and Staffing Issues, Training, Roles and Tasks

49

1 0

Managing Director

Task 12M

NO LONGER KEEP THIS CERTIFICATE

NO LONGER KEEP THIS CERTIFICATE

55 - *History/Details*  
Business Continuity Plan

Business Continuity Plan

9546 VM3COPxx Business Continuity Plan  
27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data

266 Managing Director

1 1 1

Task 12M

6861 - *History/Details*  
Non Minuted Management discussions on issues

Management Meeting Review Weekly Meeting

27244 VOP 02 Personnel and Responsibility , Staff and Staffing Issues, Training, Roles and Tasks

456 Managing Director

4 1 4

Task 1W

7057

Complaints and Vigilance Notifications

27244 VOP 02 Personnel and Responsibility , Staff and Staffing Issues, Training, Roles and Tasks

7070 - *History/Details*

Management Review

27178 VOP 13 Process Monitoring,

83

2 1 2

Task



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To discuss any problems, to assess work load and staffing.  
To review issues.

Managing Director 3M

review by the Management of the current state of staffing / workload etc.

# 156444 ✓

128 Managing Director Task 12M

7874 - History/Details  
To Ensure we have the latest version of Med Dev 2.12.  
and update management if its been updated

Review For Latest Version Med Dev 2.12.

24121 VOP 10 Non Conformance, Corrective and Preventive Actions  
24125 VOP 19 Feedback Customer Complaints Vigilance and Notifications VST Ltd

128 Managing Director Task 12M

7876 - History/Details  
To review Route map VIAMED 13485:2016 and VST 9001:2015

Maintain Update Of ISO Route Maps

27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data

804 Managing Director Task 1W  
805 Compan y Secretary IM

See if a new Summary sheet needs producing,  
print new PDF, and upload on top of the old summary

If an update is required it should be less than 2 weeks old.  
Page will indicate Requires Update 22 Aug 2018  
1534754042

7877 - History/Details  
To Plan for disaster

Disaster Planning

14768 VM3COP60.04 Viamed Disaster Planning

make sure we have a disaster plan that has been reviewed in the last 12 months.

806 Managing Director Task 12M

7878 - History/Details

Review Possible

27178 VOP 13 Process Monitoring,

807 Director Task

# 157065

# 160622 ✓ # 158859 ✓



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Review possible legal / regulator Upcoming Regulation System Reviews, Audits, Management Review, Analysis Data

Managing Director 3M

**7890 - History/Details** New UPS Rates 24730 VOP 03 Contract Review, Enquires, Office Processes

To get the next years UPS zone and Needs Checking

areas and Pricing

Import into intrastats,

No formal procedure as UPS keep changing style and layout,

can be done manually

42 Managing Director 2 1 2 Task 12M

Check the new information has been added to the system.

Check last updated date and new pricing date

134608 ✓

**7895 - History/Details** FDA Device 7026 FDA Registration Owner Number

To continue our FDA registration Establishment Registration

(for the Apgar timer)

Check we are listed on the FDA Website,

825 Managing Director 1 1 1 Task 12M

#157856 ✓

ISO Controller

**Process Scope** **Brief Description** **Responsibility/Procedure/Training** **Measurable Objective** **Task** **Audit** **Freq** **Risk** **Overall** **Action**

29 Annual license check, ensure no changes to Products licenced through CMDCAS, and Issue CMDCAS a statement that No changes have occurred.

CMDCAS Updates And Licences 27244 VOP 02 Personnel and Responsibility, Staff and Staffing Issues, Training, Roles and Tasks

49 Managing Director 1 3 3 Task 12M

#154305 ✓

Certificate will go out of date 1st November,



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Check Canadian Gazette for Latest Version of the MDR

5889 Audit And Task - 27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data

290 Managing Director Task 1 W

Look for High number outstanding tasks and audits.

Locate the reason for High number outstanding tasks and audits.

Decide on course of action to reduce / redistribute the tasks and audits

6871 - History/Details ISO14001 27178 VOP 13 Process Monitoring, System Reviews, Audits, Management Review, Analysis Data

Not yet Applied Environmental management systems 748 Managing Director Task 12M

Rolling Issue to see if we should apply this standard in the future

7744 - History/Details FDA Device 27438 VOP 01 Documentation / Records - Control, Creation, Storage, Retrieval and Revision control

CMDCAS products FDA Device Establishment And Listing 565 Managing Director Task 12M

In order to sell in the USA / Canada Markets products need to be registered with the FDA.

7833 - History/Details Importance Of Effective Quality Management 22684 VM3COP00.00 Viamed Quality Statement policy and objectives 22062 VM3COP00.00 VST Quality Statement policy and objectives

732 Managing Director Task 6M

#160397 interns

#15525

#155509

#155650



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7888 - *History/Details*  
Ensure All Sub Processes are linked to a VOP and an Audit.

23527 VOP 12 Training  
Review Processes 27178 VOP 13 Process Monitoring, Linked To VOPs And System Reviews, Audits, Management Audits Review, Analysis Data

✓ 159908  
818 Managing Compan 3 1 3  
Director y  
Secretary  
Task 1M  
Audit 12M

7895 - *History/Details*  
To conitune our FDA registration (for the Appgar timer)  
IT Controller

FDA Device  
Establishment  
Registration  
7026 FDA Registration Owner Number

Check we are listed on the FDA Website,  
825 Managing Director 1 1 1  
157856 ✓  
Task 12M

Process Scope  
6813 - *History/Details*  
Ensure the turnover report is accurate

Brief Description  
Management Meeting  
Turnover Report  
Responsibility/Procedure/Training  
16942 VM3COP27.13 Intrastats to Opera Turnover Checking  
23322 VOP 11 Equipment Control, Office, Warehouse, Pcs and Equipment

160520 ✓  
459 Managing Director 460 Compan 3 1 3  
146512 ✓  
Task 1M  
Audit 12M

Warehouse Team Leader

Process Scope  
7753 - *History/Details*  
To discuss any problems, to assess work load and staffing.  
To review issues with regard the Warehouse.  
Audits

Brief Description  
Management Meeting  
Warehouse  
Responsibility/Procedure/Training  
27244 VOP 02 Personnel and Responsibility, Staff and Staffing Issues, Training, Roles and Tasks

159127 ✓  
589 Managing Director 590 Compan 3 1 3  
157654 ✓  
Task 1M  
Audit 3M

Process Scope

Brief Description

Responsibility/Procedure/Training

Measurable Objective

Task

Audit

Freq Risk Overall Action

In terms due now

Interns.



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**7886 - History/Details**  
 To carry out Audit 18 Management Review Viamed  
 Review Viamed

**7887 - History/Details**  
 To carry out Audit 18 Management Review VST  
 Review VST

### Office Processes

**Process Scope**  
**7750 - History/Details**  
 Meeting between management and office team leader to discuss improvement of systems and address any issues

**7793 - History/Details**  
 A meeting is arranged between the office team leader and their team either as a group or individually when necessary

**Brief Description**  
 Meeting With Management  
**Responsibility/Procedure/Training**  
 23527 VOP 12 Training

**Measurable Objective**  
 23527 VOP 12 Training

Task	Audit	Freq	Risk	Overall	Action
275 Managing Director	158800 ✓	3	1	3	Task IM
639 Company Secretary		3	1	3	Task IM

156747 Internal  
 21 1 2 2  
 Company  
 y Secretary  
 188 1 2 2  
 Company  
 y Secretary  
 156658  
 x Internal  
 Audit