Roma, 25 febbraio 2020



Prot. 6810/20/FT/bb

A tutti i CAB accreditati e in corso di accreditamento Alle Associazioni degli organismi di valutazione della conformità Loro Sedi

Oggetto: <u>ACCREDIA – Circolare informativa N°1/2020</u> Disposizioni a seguito dell'emergenza sanitaria da Coronavirus

A seguito dell'emergenza epidemiologica da COVID-19, meglio noto come Coronavirus, richiamiamo l'attenzione dei CAB su quanto indicato nella <u>Linea Guida IAF ID3:2011</u> "IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations", disponibile sul sito www.iaf.nu/.

Tale Documento, applicabile per le attività ricoperte dall'accreditamento ISO/IEC 17021, può essere per analogia ritenuto una guida di riferimento applicabile anche per le altre attività di accreditamento, che rientrano nella competenza di ILAC.

Alleghiamo inoltre una guida sviluppata dal Conformity Assessment Body Advisory Committee, CABAC di IAF, per la gestione della crisi, che condividiamo.

Nello specifico riteniamo pertanto di chiarire quanto segue:

- <u>Verifiche condotte da ACCREDIA</u>: Gli Organismi di valutazione della conformità, ivi compresi i Laboratori, che si trovassero in difficoltà a causa dell'emergenza sanitaria di cui sopra, possono far presente la loro situazione direttamente al Dipartimento di riferimento. Verrà fatta una valutazione dei singoli casi, cercando ove possibile di posticipare le verifiche o comunque di adottare ogni altra iniziativa che possa agevolare il superamento di questa temporanea situazione di difficoltà.
- <u>Verifiche condotte dagli Organismi di valutazione della conformità</u>: Gli Organismi di certificazione di sistemi di gestione possono applicare nei confronti delle Organizzazioni clienti coinvolte dall'emergenza sanitaria le deroghe disciplinate dalla <u>Linea Guida IAF</u> <u>ID3</u>:2011.

Le disposizioni di cui sopra trovano applicazione anche per il settore IAF 28 "Costruzioni".

Gli Organismi di valutazione della conformità, non ricompresi nel precedente paragrafo, dovranno valutare come applicare nei singoli casi le disposizioni della <u>Línea Guida IAF ID3:2011</u>, ove fosse applicabile e nei limiti di legge consentiti.

Ogni iniziativa adottata e/o richiesta avanzata dagli Organismi di valutazione della conformità dettata dall'emergenza dovrà essere documentata, giustificata e resa disponibile ad ACCREDIA su richiesta.

Le comunicazioni di cui alla presente si intendono valide fino all'8 marzo p.v. Ulteriori aggiornamenti saranno forniti sulla base dell'evolversi della situazione.

Cordiali saluti



ACCREDIA



IAF Informative Document

IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

Issue 1

(IAF ID 3: 2011)

Issued: 8 November 2011 Application Date: 8 November 2012 © International Accreditation Forum, Inc. 2011 IAF ID 3:2011

IAF ID 3:2011

International Accreditation Forum, Inc.

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The International Accreditation Forum, Inc. (IAF) operates programs for the accreditation of bodies that provide conformity assessment services, and such accreditation facilitates trade and reduces demands for multiple certifications.

Accreditation reduces risk for business and its customers by assuring them that accredited Conformity Assessment Bodies (CABs) are competent to carry out the work they undertake within their scope of accreditation. Accreditation Bodies (ABs) which are members of IAF and their accredited CABs are required to comply with appropriate international standards and IAF mandatory documents for the consistent application of those standards.

AB members of the IAF Multilateral Recognition Arrangement (MLA) conduct regular evaluations of each other to assure the equivalence of their accreditation programs. The IAF MLAs operate at two levels:

- The accreditation of CABs to standards including ISO/IEC 17021 for management systems CABs, ISO/IEC 17024 for personnel CABs and ISO/IEC Guide 65 for product CABs, is considered a framework MLA. A framework MLA provides confidence that accredited CABs are equally reliable in the performance of conformity assessment activities.
- The accreditation of CABs that also includes the specific conformity assessment standard or scheme as a scope of accreditation provides confidence in the equivalence of certification.

The IAF MLA delivers the confidence needed for market acceptance of certification. An organization or person with certification to a specific standard or scheme that is accredited by an IAF MLA signatory AB can be recognized worldwide thereby facilitating international trade.

Issue No 1 Prepared by: IAF Technical Committee Approved by: IAF Members Date: 1 September 2011 Issue Date: 8 November 2011 Application Date: 8 November 2012 Name for Enquiries: John Owen, IAF Corporate Secretary Telephone: +612 9481 7343; Email: <secretary1@iaf.nu>

Issue 1

IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

Introduction to IAF Informative Documents

This IAF Informative Document reflects the consensus of IAF members on this subject and is intended to support the consistent application of requirements. However, being a document for information purposes only, IAF Accreditation Body Members, and the Conformity Assessment Bodies (CAB) they accredit, are not under any obligation to use or comply with anything in this document.

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Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

0. Introduction

In a normal business environment, every organization is continuously exposed to opportunities, challenges, and risks. However, extraordinary events or circumstance beyond the control of the organization happen. In such a circumstance, ABs and CABs should have a process for the proper maintenance of accreditation and certification in accordance with the guidelines outlined in this document.

It is important for an AB and CAB to be able

- to demonstrate reasonable due diligence, mutual understanding and trust and
- to establish an appropriate course of actions in response to extraordinary events.

The objective of the document is to provide to ABs and CABs guidance on the appropriate course of action.

This informative document is not intended to override requirements in standards or schemes. Where a standard or scheme provides no flexibility regardless of the crises that has occurred, guidance and an agreed way ahead should always be sought from the relevant accreditation body or scheme owner.

1. Scope

This informative document is primarily applicable for management systems certification.

2. Definition:

2.1 Extraordinary event or circumstance: A circumstance beyond the control of the organization, commonly referred to as "Force Majeure" or "act of God". Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters.

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3. Extraordinary event or circumstance affecting a certified organization

An extraordinary event affecting a certified organization or CAB may temporarily prevent the CAB from carrying out planned audits on-site. When such a situation occurs, ABs and CABs, operating under recognised standards or regulatory documents need to establish (in consultation with certified organizations) a reasonable planned course of action.

The CAB should assess the risks of continuing certification and establish a documented policy and process, outlining the steps it will take in the event a certified organization is affected by an extraordinary event.

The established policy and process of the CAB should define methods for evaluating the current and expected future situation of the certified organization, and define alternate potential short-term methods of assessing the organization to verify continuing effectiveness of its management systems.

To enable the CAB to assess risk for continuing certification and understand the certified organization's current and expected future situation, the CAB should gather necessary information from the certified organization before deciding on an appropriate course of action. The information collected by the CAB should include the following as appropriate:

- When will the organization be able to function normally?
- When will the organization be able to ship products or perform the service defined within the current scope of certification?
- Will the organization need to use alternative manufacturing and/or distribution sites? If so, are these currently covered under the current certification or will they need to be evaluated?
- Does existing inventory still meet customer specifications or will the certified organization contact its customers regarding possible concessions?
- If the certified organization is certified to a management system standard that requires a disaster recovery plan or emergency response plan, has the certified organization implemented the plan and was it effective?
- Will some of the processes and/or services performed or products shipped be

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subcontracted to other organizations? If so, how will the other organizations' activities be controlled by the certified organization?

- To what extent has operation of the management system been affected?
- Has the Certified organization conducted an impact assessment?
- Identification of alternative sampling sites, as appropriate.

If the risk of continuing certification is low, and based on the collected information the CAB may need to consider alternative short-term methods of assessment to verify continuing system effectiveness for the organization. This may include requesting relevant documentation (for example, management review meeting minutes, corrective action records, results of internal audits, test/inspection reports, etc.) to be reviewed off site by the CAB to determine continuing suitability of the certification (on a short-term basis only). At a minimum, the process should address the following items:

- Proactive communication between the affected certified organization and the CAB.
- Steps the CAB will take to assess the affected organization and how the plan to move forward will be communicated.
- Specifying the maximum time an alternative short-term assessment method could be used before suspension or withdrawal of certification
- Criteria for renewing normal oversight, including the method and timing of any reinstatement activities and assessments.
- Possible amendments to organization's oversight plans on a case-by-case basis and in accordance with CAB procedures.
- Ensuring that any deviation from accreditation requirements and CAB procedures is justified and documented, and agreement reached with the AB on plans to address temporary deviations from requirements.
- Re-establishment of surveillance/recertification activities according to CAB oversight plans when access to the affected location is re-established.

If contact with the organization cannot be made, the CAB should follow normal processes and procedures for suspension and withdrawal of certification.

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When developing alternate short-term methods of assessment the CAB should take into consideration the following limitations:

a) First Surveillance Audit

Normally, the first surveillance audit after initial certification is to be within 12 months of the last day of the initial stage 2 audit (ISO/IEC 17021:2011, 9.3.2.2). However, providing that sufficient evidence has been collected as above, to provide confidence that the certified management system is effective consideration may be given to postpone the first surveillance for a period not normally exceeding 6 months (18 months from date of initial certification).

Otherwise the certificate has to be suspended or the scope reduced.

b) Subsequent Surveillance Audits

There may be specific circumstances by which a CAB can justify adjusting the timing of a subsequent surveillance audit. If an organization has to shut down completely for a limited period of time (less than 6 months), it would be reasonable for a CAB to postpone an audit that had been scheduled to occur during the shutdown until the organization resumes operations. The organization should inform the CAB when operations resume so that the CAB can conduct the audit promptly.

c) Recertification Audits

Normally the recertification audit must be completed and the recertification decision made prior to expiration to avoid loss of certification (ISO/IEC 17021:2011, 9.1.1.2). However, providing that sufficient evidence has been collected as above, to provide confidence that the certified management system is effective consideration may be given to extend the certification for a period not normally exceeding 6 month beyond the original expiry date.

The re-certification should be carried out within this permissible extended period. Otherwise, a new initial audit should be performed. The expiration of the renewed certification should be based on the original recertification cycle.

d) Information to the AB

All deviations from the established certification program should be justified, documented and made available to ABs upon request.

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4. Extraordinary event or circumstance affecting the CAB

An extraordinary event affecting the CAB may temporarily prevent the AB from carrying out planned assessments on-site. When these situations occur, ABs and CABs operating within their accreditation need to establish a reasonable planned course of action.

The AB should assess the risks of continuing accreditation and establish a documented policy and process, outlining the steps it will take in the event when accredited CABs are affected by an extraordinary event or circumstances.

The established policy and process of the AB should define methods to evaluate the current and expected future situation of the CAB, and define alternate potential short-term methods of assessment to verify continuing system effectiveness. The AB should also define in the procedures the required reporting and communication activities with the CAB.

The CAB's communication with its AB should contain, at least, an evaluation of the CAB's current and expected future situation. The following information should be provided by the CAB to the AB as appropriate:

- Scope and extent of the affected services and business areas and sites.
- Number of affected clients.
- When will the CAB be able to function normally within the current scope of accreditation?
- Does the CAB plans to outsource some of it's activities or operate in alternatives sites to ensure business continuity? If so, are these currently covered under the current accreditation or will they need to be evaluated by the AB?
- Proactive communication between affected certified organizations and the CAB
- Is IAF MD 4 "IAF Mandatory Document for the use of Computer Assisted Auditing Techniques ("CAAT") for Accredited Certification of Management Systems" applied?
- Steps the CAB will take to assess those affected organizations and how the plan to move forward will be communicated to the certified organizations.
- Possible amendments to each certified organization's oversight plans on a caseby-case basis and in accordance with CAB procedures.

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- Ensuring that any deviation from accreditation requirements and CAB procedures is justified and documented, and written agreement reached with AB (if deviation from an accreditation requirement is requested) on plans to address temporary deviations from requirements.
- Re-establishment of surveillance/recertification activities according to CAB oversight plans when access to the area is re-established.

4.1 Breakdown of the CAB

This may occur when the CAB has not been able to recuperate from the extraordinary event or circumstances that affected the CAB's business, and therefore, is no longer able or authorized to offer its accredited service, either completely or in part (breakdown of the CAB). The same applies to liquidation or bankruptcy. In these cases the CAB is obliged to inform its AB immediately.

Under these circumstances, the CAB and the AB should cooperate in facilitating the transition to other CAB(s) for the currently certified organizations in accordance with IAF MD2 IAF Mandatory Document for the Transfer of Accredited Certification of Management Systems.

5. Extraordinary event or circumstance affecting the AB

An extraordinary event or circumstance affecting the AB may temporarily prevent the AB from carrying out planned assessments of their accredited CABs. When this situation occurs, ABs and CABs need to establish a reasonable planned course of action.

Where appropriate efforts should be made to utilize another IAF member AB or local resources (including outsourcing) to complete the assessment on schedule before deciding to suspend or reduce of scope of accreditation.

5.1 Breakdown of the AB

This may occur when the AB has not been able to recuperate from the extraordinary event or circumstance that affected the AB's activity, and therefore, is no longer able or authorized to offer its accreditation service, either completely or in part (breakdown of the AB). The same applies to liquidation or bankruptcy. In these cases the AB is obliged to inform IAF, scheme owners and regulatory authorities, as appropriate, immediately.

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As a consequence, the AB is no longer able to fulfil its obligations for the surveillance of existing accredited CABs. The loss of accreditation under these circumstances should not affect certificates issued by the CAB until six months after the official information has been provided to the CAB. Once informed the CAB should initiate a re-accreditation or the specified procedure for transferring of accreditation by submitting an application to another IAF member AB, who should take previous assessments into account..

Note: In some jurisdictions, the breakdown or failure of an AB is covered by legislation and this section may not apply.

Once an application has been provided to the new AB, the new AB should agree with the CAB on the handling of the accreditation logo on the CAB's certificate.

End of IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting CABs and Certified Organizations

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Further Information

For further Information on this document or other IAF documents, contact any member of IAF or the IAF Secretariat.

For contact details of members of IAF see - IAF Web Site - <http://www.iaf.nu>

Secretariat -

John Owen,

IAF Corporate Secretary,

Telephone +612 9481 7343

email <secretary1@iaf.nu>

Impact of COVID-19

Background

Faced with the growing impact of the COVID-19 epidemic, performing audits in affected areas has become a high-risk task in particular parts of the world. In some cases, governments are advising their citizens not to travel. Therefore, CBs and ABs must jointly act to address this situation.

In the past, IAF did try to address such unlikely situations with the publication of an IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011 - Issue 1). At first view, this document offers suitable guidelines for handling events relating to the COVID-19 epidemic.

On examination of the scope statement of IAF ID 3, the current epidemic would appear to be largely covered by this scope. However, on more detailed examination, the paradigm underscoring the guidelines tends to be oriented to handling a single organization's certification (c.f. the information which should be collected to establish the situation for each individual organization, etc. [see ID3 Cl. 3]).

Given the volumes of certifications concerned, in some cases, it will not always be feasible to address the current situation for each individual organization and a wider approach (e.g. for a given country or industry sector) needs to be considered. In conclusion, not all the guidelines contained in IAF ID3 would be appropriate to be systematically applied in this particular case. The principles contained in this IAF ID 3 are still relevant, but a more focused set of agreed guidelines would be of greater benefit to the conformity assessment community as a whole and their customers. A proposal for such focussed guidelines to temporarily replace ID 3 is given below.

Further information is available in the following reference documents:

IAF Informative Document on the Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations (IAF ID 3: 2011 - Issue 1)

IAF Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes (IAF MD 4:2018 - Issue 2)

ISO/IEC 17021-1:2015 Conformity assessment - Requirements for bodies providing audit and certification of management systems - Part 1: Requirements

ISO 19011:2018 Guidelines for auditing management systems

Proposed guidelines to mitigate the impact of COVID-19 epidemic on certification and accreditation bodies (based on IAF ID3-2011)

Introduction

The guidelines contained hereafter are only intended to be used in designing and implementing an appropriate response to the current COVID-19 epidemic.

Main dispositions

- 1) The CB should assess the risks of continuing certification and establish a documented policy and process, outlining the steps it intends to take in the event that a certified organization is affected by the COVID-19 event. This can apply to an affected organization itself e.g. a manufacturing plant forced to curtail activities due to the risks to the workforce or to clients of such an organization, forced to adjust its supply chain dynamics. The justification should be documented and evaluated by the CB to ensure that the organization is sincerely affected due to this epidemic and to what extent this is the case. The current dispositions do not apply in any other case. The CB also needs to consider the risks related to cases where planning/conducting of the audit is not easy because reaching the organization's premises may be difficult or inadvisable for the auditor (e.g. health risks, flight cancellations, etc.)
- 2) Flexibility on imposing fixed audit dates (e.g. all audits for re-certification or 1st surveillance after initial certification) should be postponed when appropriate by the CB and AB concerned. It is recommended that both these fixed audit dates should be initially extended by a period of no more than six months, which should then be reviewed as the six-month period comes to a close, based on the current travel and medical advice. At renewal stage, the validity of the existing certificate can be extended to allow the CB and its client to complete the renewal process. No penalty is incurred on the customer organization or the CB.
- 3) CBs (and ABs) should investigate the use of remote audit techniques (see the current versions of ISO 19011 and IAF MD 4) to perform at least partial audits, where possible.
- 4) As recommended in IAF ID3 Clause 4, similar approaches may have to be implemented by ABs in the event of a CB office assessment or witness assessment being impractical or impossible
- 5) For any affected given country or region, the dispositions taken by the local AB should apply to all other interested ABs (with accredited CBs in that country or active in that country).
- 6) Any dispositions adopted by the organization, the CB or the AB may have to be revisited and updated depending the on-going evolution of the situation.
- 7) A CB/AB should inform its AB/CBs of any on-going developments and any changes to the policy or processes implemented. Both parties should confer to agree on aspects such as the end of validity of the present dispositions and any transition arrangements back to a normal mode of operations for certification and accreditation. All parties should act in good faith.

- 8) These dispositions are not intended to override requirements in specific sector schemes. It is recommended that scheme owners are consulted in order to approve an agreed way ahead.
- 9) As appropriate, the CB community should also promote appropriate interactions with IAF if the situation requires it.