


Objectives




Objectives :
The objective of witnessing, in conformity with § 7.5.6 and § 7.7.3 of ISO/IEC 17011, is to provide assurance of the competence of the MS CB across the scope of accreditation.

The witnessing of CB's audits on their clients by ABs is valuable for:

- i. verifying, on site, the effective implementation of the CB's certification programmes and procedures (and especially with regard to their assignment of competent audit teams and determination of audit time) and determine the correct assignment of scope by the CB for the client,
- ii. observing the CB's auditors to evaluate if they:
 - a. conform with the CB's procedures;
 - b. adequately address the requirements of:
 - o certification requirements;
 - o applicable points of ISO/IEC 17021;
 - o relevant IAF documents; and
 - o any relevant sector specific requirements, as applicable.
- iii. obtaining a representative sample of the competence of the CB across the accreditation scope.

Requirements




- This MD will enable an AB to determine whether the CB has competent scheduling/planning and auditing personnel, and to assess the CB's competence to perform certification audits under accreditation.
- Witnessing can also be initiated for other reasons, according to the AB's procedures and/or policies e.g. upon the receipt of complaints, claims, disputes, market or regulator feedback.

General policies :

- ABs shall have a policy to cover the scope for each applicant and accredited CB through the use of the various mechanisms that are available, including:
 - i. office assessment activities;
 - ii. witnessing activities; and
 - iii. other assessment activities, as defined by the AB according to the needs identified.

ABs shall ensure that the requirement for witnessing by the AB is included in the contract agreements between CBs and their clients and confirm that refusal to accept a witness assessment by the AB, must be justified and accepted by the CB and the AB, and could result in withdrawal of accredited certification where reasons are not accepted.


Requirements



General instructions for using witnessing to cover the scope of accreditation :

- ABs shall have an assessment programme covering the scope of each applicant or accredited CB for each accreditation cycle.
- The programme shall consider the need to assess any cross-frontier certification activities, based on the size of the CB operations, their criticality, and feedback from the local AB.
- If witnessing is needed, the AB shall have a process for cooperation with the local AB, according to MLA rules and regulations.
- When deciding how many and which audits are to be witnessed, the AB shall take into account factors such as:
 - i. the CB's overall performance;
 - ii. factors such as process complexity or legislation etc. which influence the ability of the certified organization to demonstrate its ability to meet the intended outcomes of the MS;
 - iii. feedback from interested parties including complaints about certified organizations;
 - iv. the results of the CB's internal audits;
 - v. scheme owner requirements, etc.;
 - vi. changes in CB work patterns – growth of work within a specific region or technical area;
 - vii. number of clients within the CB's scope of accreditation;
 - viii. confidence in the CB's auditor evaluation and approval process; and
 - ix. previous or other office or witnessing assessment results, etc.


Requirements



The following additional factors may be taken into account to select witnessing activities:

- i. number of certificates issued;
- ii. number of auditors;
- iii. different auditors;
- iv. whether auditors are internal staff or external resource;
- v. different audits, initial audit (stage 1/stage 2), surveillance and recertification;
- vi. complex clients, combined and/or integrated audits, multi-site audits;
- vii. countries where audits in the certification process are performed;
- viii. result of previous witnessing activities;
- ix. Complaints, customer surveys;
- x. interested parties and regulators requests;
- xi. the technical clusters already assessed;
- xii. experience from other types of accreditation of the CB;
- xiii. previous history of the CB's ability to manage its operations;
- xiv. level of controls exercised by a CB over its critical activities;
- xv. specific scheme requirements; and
- xvi. national agreements with clients


Requirements



General instructions for carrying out a witnessing :


- The CB shall provide the complete and updated schedule of confirmed and planned audits.
- ABs shall have a policy to deal with refusals by a CB or its clients, including the imposition of sanctions on the CB when the refusal is not duly justified and accepted by the AB.
- If the CB client refuses the AB witnessing, in order to avoid sanctions, the CB shall withdraw the existing accredited certificate, or, if not yet certified, the CB will not be allowed to place the accreditation logo on the future certificate, unless the refusal is duly justified and accepted by the AB.
- If sanctions are imposed on a CB resulting in certificate withdrawal then other ABs and all scheme owners who may be impacted shall be notified, if their identity is known.
- An accredited certificate shall not be issued if, in order to avoid having its audit witnessed, the organization transfers the certificate to another CB or if the CB intends to reissue the same certificate under the coverage of another AB.
- Pre-witness activities shall ensure that the AB has the CB's audit plan, previous audit reports if applicable, audit team competence records and the justification for calculation of the audit time.

Requirements




- The AB shall appoint an assessment team, competent in the relevant scope of accreditation. The AB shall inform the CB in advance of the AB assessment team composition.
- The CB and/or its client can object to the nomination of a given AB assessor on the grounds of demonstrated close or direct relationships with competitors (threats to impartiality) or a previous valid complaint against an assessor, etc..
- It is the duty of the CB to inform its client, to explain the witnessing procedure, and to get the client's agreement. The CB is not expected to change its audit team, audit plan or audit duration due to the witnessing. If such changes do take place, the CB shall provide appropriate justification to the AB.
- Access to the client's documentation reviewed by the CB's audit team shall be promptly provided to the AB's assessors upon request.
- Any information collected during the witnessing of an audit is kept confidential.
- The AB assessor shall not directly ask questions to the CB's clients.
- AB assessors shall not provide any opinions to the CB, while the audit is being conducted.
- The AB assessors shall not provide any opinions to the CB's client at any time.
- Normally, the full on-site audit shall be witnessed, unless objectives for a particular activity can be satisfied with a partial witnessing.

Requirements



- Feedback on the CB's performance, including any assessment findings/non-conformities, shall be given to the CB's audit team when the witnessing is completed.
- The feedback should include outlining the AB's reporting process, the CB response / reaction process and the AB decision-making process.
- Where possible this feedback should be provided to the CB's management as well. This should occur after the audit, always in the absence of the CB's client.
- When relevant to the objective and scope of the witnessing, the AB's assessors shall get and review the CB's own audit report (and any additional information required).
- It is the responsibility of the CB's client to inform in advance the audit team and the AB assessors, of all the applicable safety requirements. AB assessors shall conform to safety rules made known to them by the organization; however, it is expected that AB assessors shall take immediate action at any time to avoid injury, including leaving the area or the organization if necessary.
- During the assessment, if AB assessor observes a potential condition to be an imminent risk of high severity, the AB assessor shall request an immediate private meeting with the CB's audit team leader to inform him or her of the potential threat, with the expectation that the CB's audit team leader will address the threat with the organization in accordance with the CB's process and any legal obligation.


Requirements



PROCEDURES :


- ABs shall have written procedures for ensuring that appropriate mechanisms and criteria are in place to cover and assess:
 - i. the applicant scope of accreditation (initial or extension) in a representative way; and
 - ii. the scope of accreditation during each accreditation cycle.
- Those procedures shall conform with the provisions set out in this document, and detail:
 - i. the approach to achieve representative sampling (quantitatively and qualitatively);
 - ii. the mechanisms used to cover the scope of accreditation and the criteria for selection and use of each mechanism; and
 - iii. the records to be kept.

Requirements




- AB witnessing report shall include where applicable:
 - i. comments on CB planning (determination of audit time, audit programme - if available - and audit plan);
 - ii. competence of the team, job assignment, scope coverage and effectiveness of the audit;
 - iii. auditing technique followed like interview, observation of processes and activities, review of documentation and records, sampling, establishment of audit trails, ability to collect, verify and record evidence of conformity and nonconformity in line with the required elements for the type of audit, appropriateness of grading of findings, handling of previous findings, reporting, opening and closing meetings and debriefs;
 - iv. comments on CB findings and conclusions in relation to the client MS conformity and implementation, and significant findings not reported or identified by the CB's audit team, if applicable;
 - v. whether impartiality was maintained, safety arrangements, confidentiality, regulatory or legal compliance, post-witnessing activities if included, conformity with the CB procedures;
 - vi. AB findings and conclusions identified during the witnessed audit; and
 - vii. a conclusion on the reliability of the CB's report to reflect the actual audit findings and conclusions.

Requirements



- The AB report on the witnessing should not duplicate the information already provided in the CB audit report.
- If the AB assessor was not present throughout the CB audit, the witness report should outline which audit activities were witnessed.


Requirements



SPECIFIC APPROACH FOR SAMPLING OF SCOPES :

- All the IAF codes have been merged into a series of technical clusters as appropriate for each type of MS certification (QMS, EMS & OH&SMS).
- Critical codes have been identified for each technical cluster. A critical code is a code that from a technical point requires the CB's audit team to have a higher level of:
 - competence (due to the complexity of the processes / environmental aspects involved), or
 - caution (due to the risk of non-conformities and their impact, or to the high degree of regulation).
 - diligence (due to the desired personal behaviours that are important for personnel involved in certification activities as required in a specific context).
- If another coding system is used, the CB shall establish a correlation between their coding system and the coding system defined in this document.


Requirements



General rules applicable to QMS, EMS & OH&SMS schemes :


- This MD provides baseline sampling. The ABs are allowed to have increased sampling strategies for various reasons.
- The assessment program shall guarantee that competence is assessed throughout the scope in the accreditation cycle, for all IAF codes of each MS scheme. If this is not possible in the accreditation cycle, then the AB shall reduce the scope of accreditation.
- In the initial accreditation cycle of each MS scheme (meaning from 1st surveillance to the 1st reassessment), the AB shall perform at least one witnessing activity in each technical cluster of each MS scheme.
- This programme will continue until the CB has demonstrated sufficient experience and performance for an enhanced programme.
- When this happens, the AB shall perform at least one witnessing activity in each technical cluster of each MS scheme, to be complemented with other assessment activities to guarantee that each technical cluster is assessed during two successive accreditation cycles.
- The AB shall be able to justify why the witnessing programme was reduced. The witnessing frequency established for the 1st cycle should be reinstated if significant changes occur in the CBs' auditor qualification process, auditing practices or results and audit personnel.

Requirements




- The following witnessing rules apply for the granting and extension of accreditation of each MS scheme to be complemented with other assessment activities to guarantee the appropriate coverage of the applicant scope:
 - i. if a technical cluster has only 1 critical code, the AB shall perform a witnessing activity in this critical code to grant accreditation for all the IAF codes in that cluster –
 - e.g. for QMS, cluster Food, with 1 witnessing activity in IAF code 03, the AB can grant accreditation in the other IAF codes (01 and 30) of that cluster; for EMS, cluster Paper, with 1 witnessing activity in IAF code 09, the AB can grant accreditation in the other IAF codes (7 and 8) of that cluster;
 - ii. if a technical cluster has more than 1 critical code, the AB shall perform at least a witnessing activity:
 - a. in all the critical codes that are identified with an "and" (on the "Critical code" column);
 - b. in one of the critical codes that are identified with an "or" (on the "Critical code" column);

Requirements



- iii. if it is not possible to perform a witnessing activity in the IAF code/s identified as critical, the AB can agree with the CB on one of these two options:
 - a. the AB can grant accreditation only in the non-critical IAF code/s of the technical cluster for one of which a witnessing activity is performed
 - b. the AB can grant accreditation in all the codes of the cluster, performing an office activity in the critical code/s, but on condition:
 - o that the CB has demonstrated its competence on a documental basis in all the codes of the cluster;
 - o that the witnessing activity in the critical code/s takes place before any certificate in the critical code/s based on accreditation is issued.
- In cases, if the result of the witnessing activity is negative, the AB shall consider reducing the scope of accreditation.


Requirements



- If the CB wants to be accredited only in one or more non-critical IAF codes, a minimum of one witness audit is required in each cluster with non-critical IAF codes.
- For initial accreditation for each MS scheme, the AB shall witness both stage 1 and stage 2 audits, for at least one of the CB's clients.
- Prior to witnessing the stage 2 of the same audit, the applicant CB shall submit the completed report and / or conclusions from the stage 1 audit to the AB's assessment team.
- If the CB does not have any new clients, it is possible to witness one renewal or two surveillances which cover the key processes.

The possibility to grant accreditation in a whole IAF code (note: the word 'whole' reflects that some ABs use more detailed scoping inside each IAF code, partitioning it in NACE codes or IAF sub-codes) is always subject to the CB demonstrating it has the competence to manage certification in all of the underlying technical areas.

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- In addition to the above, it is necessary to assess competence also for all noncritical codes before the AB can grant accreditation. Therefore accreditation shall be granted only:
 - i. in IAF codes where the CB has already taken decisions for certification
 - ii. in IAF codes where the CB has demonstrated its competence by other means
- In cases of an integrated or combined management system audit, the scope of the witnessing activity shall be agreed with the CB.
- If a witnessing activity has been recently performed in the same code, for a different purpose (e.g.: ISO 13485, ISO 3834, EN 9100), the AB can consider removing the necessity of another witnessing activity.

Thank you!

