Policy on assessment and surveillance in special situations

A  Preamble

1  Introduction and purpose of the policy
When conditions are considered dangerous, inappropriate or not possible for some reason for an IOAS assessor to carry out a visit, it may be necessary to postpone it, re-schedule, perform a remote/virtual assessment or conduct desk review of documentation according to the case, in order to partially or fully comply with scheme requirements.

The purpose of this policy is to define the criteria for making this decision and the resulting implications for both the IOAS operation and the accreditation of the affected certification body (CB). This is not related to exceptions requested by the Certification Bodies (CBs) which is covered by PL0522.

2  Scope
The policy is applicable in exceptional circumstances that may occur as a result of ‘Force Majeure’ type events, such as political unrest, outbreak of disease, extreme climatic conditions, travel restrictions, etc. that affect the ability of IOAS to perform as scheduled any visit type (e.g. assessment, re-assessment, annual surveillance and operator site visit) deemed necessary in line with the IOAS policies and procedures for the initial and continuing assessment or accreditation of a CB. Other relevant documents are:

- PL0519 - Policy on termination of application (during assessment);
- PL0522 - Policy on granting emergency exceptions;
- PL0506 - Suspension policy;
- WK0310 - Guidance on Conducting Remote assessments;
- IAF ID 3: 2011. IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CBs and Certified Organizations.

3  Definitions
General reference is made to the definitions provided in the IOAS General Operating Manual.

4  Access and distribution
This document is distributed to all CBs, IOAS Board of Directors (BoD) and Accreditation Committee (AC) annually. Staff are informed of changes as soon as they have been finalized. Interested parties may obtain a copy on request.

5  Authority and revision
This policy is approved by the IOAS Executive Director. It is the responsibility of the IOAS Executive Director (ED) to review the appropriateness of the policy from time to time. It may be revised when the need arises. Revisions must be approved by the IOAS ED. Its effectiveness in meeting the quality policy of the IOAS will be assessed during Internal Review and any measures for improvement notified to the ED and the BoD.
B Policy

1 Circumstances which may alter the nature of, or postpone a visit

Circumstances which might precipitate a decision to postpone, reschedule, change the nature or cancel an assessment or surveillance visit to a CB office and operator sites would include:

- Conditions of war or political unrest;
- Quarantine restrictions or other disease threats or outbreaks that would prevent or make access inadvisable/impossible. Imposed travel restrictions might apply to the assessor’s home country, in transit countries or the country of destination;
- Natural disasters; and/or,
- Any other reasons where the relevant Foreign Office of the assessor’s country advises against travel. Travel advisories may refer to specific regions of a country to be avoided and these shall be taken into account in making the decision;
- When these circumstances arise, preventing IOAS to visit the CB office, IOAS will conduct the visit remotely whenever possible in order to maintain the accreditation schedule.

2 Implications for the IOAS and the affected CB

In cases of initial assessment, the visit may be postponed for up to one year from the intended date without the expiry of the application. The accreditation process may be stopped until the on-site assessment can be done. Accreditation may however be granted based on alternative measures including remote/virtual assessment as long as IOAS satisfies itself that all accreditation requirements can be verified.

In cases of re-assessment the visit may be postponed for up to one year from the intended date after which the CB will be suspended. In extraordinary cases where the delay is such that the accreditation is likely to expire before necessary assessment procedures and reaccreditation decision, the accreditation certificate may be extended a further 6 months depending on the risk factors associated with the CB, and taking into account any scheme owner input or requirements. The decision to extend shall be taken by the IOAS ED. A decision to renew accreditation may be taken based on remote/virtual assessment activities as long as IOAS satisfies itself that all accreditation requirements can be verified.

In cases of annual surveillance, greater flexibility exists in terms of CB reporting and desk audits and these will be exploited to the full as described below.

Operator site visits (witness and review/verification audits) taking place as part of assessment, re-assessment or surveillance whether attached to CB office visits or separately remain an important part of competence assessment and all avenues including using local assessors or performing remote audits shall be explored to ensure the number, range and type of inspections meet scheme owner or IOAS requirements as described below.
C Procedure

All decisions to postpone a visit will be taken by the Programme Manager (PM) in conjunction with the respective Client Manager (CM), assessor and the relevant CB. An assessor who feels uncomfortable going to any country or region for any reason shall not be forced to undertake that assignment. Such decisions will be reported to the IOAS ED.

1 Assessments

Any decision to postpone a visit will be formally communicated to the CB in writing informing them of the implications of a delay extending past one year. Remote/virtual audits may be considered for all types of visits including initial applications and scope extension. IOAS shall reserve the right to require additional assessment activity whether performed remotely or on-site once that becomes possible or postpone the accreditation decision should assessment results show that not all accreditation requirements could be verified.

The CM will maintain contact with the CB and monitor travel advisories in order to reschedule the visit as soon as possible.

If the assessment cannot be rescheduled within one year of the original planned date, the application will be terminated according to PL0519 unless there is express allowance from the scheme owner.

2 Re-assessments

Any decision to postpone a visit will be formally communicated to the CB in writing informing them of the implications of a delay extending past one year. Remote audits may be considered to cover the CB office audit unless the CB is considered high risk. Attending virtual inspections that the CB is carrying out to operators may replace IOAS witness audit. This must be confirmed and accordingly registered by IOAS PM with the corresponding justification.

The CM will maintain contact with the CB and monitor travel advisories in order to reschedule the visit as soon as possible.

If a re-assessment is postponed, an extension to the accreditation certificate may be awarded for up to a further 6 months at the discretion of the PM, and with approval of the ED as above. The CB may be required to provide information or operator files to allow continued surveillance at a distance so as to maintain confidence in the work of the CB. Such surveillance will be documented, and any arising nonconformities will be monitored by the IOAS AC. Such an approach shall take into account scheme owner requirements.

If the re-assessment cannot be done remotely or cannot be rescheduled within one year of the original planned date, the accreditation status of the CB will be suspended in accordance with PL0506.

3 Surveillance

Postponing operator site visits until after the threat/restriction is over or joining the CB inspections virtually may be considered on a case by case basis unless scheme owner requirements prohibit this.
In very exceptional circumstances when a required visit or remote assessment cannot be performed in any format within the required calendar year additional reporting by the CB and the provision of operator files for desk review shall be requested.

The type of information required and the number and type of operator files to be reviewed will follow normal surveillance practice according to PR0508. The results will be documented making clear the nature of the surveillance and be monitored by the IOAS AC in the normal way.

If IOAS are unable to perform two consecutive required visits in any format the CB will be suspended according to PL0506.

4 CBs with multiple sites
In the case of CBs with multiple sites, may conduct a remote assessment of the CB sites provided the CB is not high risk and is able to accommodate such an approach or may choose other suitable sites that are accessible.