



Heads Up

Issue: 07

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To: ANSI-RAB NAP Accredited Registrars and Accreditation Auditors

From: Randy Dougherty, Director of Registrar Accreditation

Re: Requirement and Expectations for a Committee to Safeguard Impartiality
For QMS, Clause 2.1.2.e
For EMS, Clause 4.1.2.e

In April 2001 at a meeting of the IAAR, the ANSI-RAB NAP was challenged to justify the requirement for a committee (known by various terms by CRBs as a governing board, advisory committee, certification committee, etc.). The ANSI-RAB NAP was also challenged to explain the inconsistency in application by its accreditation auditors. The ANSI-RAB NAP was also challenged to explain the inconsistency between accreditation bodies.

The ANSI-RAB NAP, working with IAAR committees and its QMS Council, studied the issue. The challenges about inconsistencies were valid.

The ANSI-RAB NAP concluded that the requirement for and purpose of the committee is to safeguard impartiality. This is well documented in ISO/IEC Guides 62 and 66, and related IAF Guidance (see attachments).

The ANSI-RAB NAP also concluded that requirement was being misapplied by the ANSI-RAB NAP and its accreditation auditors, by our expectation of having an individual on the committee for each IAF industry code for which the CRB is approved. The ANSI-RAB NAP has changed its practices to correctly apply the requirement.

Consistent with the ANSI-RAB NAP's practice to promote harmonization among accreditation bodies, it is proposing to discuss this issue at the IAF Technical Committee meeting in Australia in February 2003. Copies of the discussion papers are attached.

ANSI-RAB NAP accreditation auditors will expect to see evidence that each accredited certification/registration body (CRB) has a committee for the purpose of safeguarding impartiality; that the committee has been effectively oriented or trained to understand this responsibility; and that the CRB provides the information and opportunity necessary for the committee to fulfill this purpose.

**Discussion Paper on the 2.1.2.e Committee
By Randy Dougherty, ANSI-RAB NAP
For the IAF Technical Committee Meeting
February 2003**

There are two purposes for this paper. The first purpose is to increase the consistency and uniformity of application by accreditation bodies to reduce the problems caused CRBs by differences between accreditors. The second purpose is to improve the quality of audits by accreditation bodies of the use of 2.1.2.e committee by CRBs, thereby influencing more effective use of the committee by CRBs to fulfill their purpose, which is to safeguard impartiality of registrations.

Purpose of the Committee: To Safeguard Impartiality

The purpose of the committee, as stated in ISO/IEC Guide 62:1996 and fully reinforced by all related IAF Guidance, is to safeguard impartiality in the operations of a CRB. It is not intended to demonstrate the technical competence of a CRB. (The specific references supporting this assertion can be found in the paper by the ANSI-RAB NAP.)

It is requested that the IAF Technical Committee consider this assertion, and affirm it.

Attached are two papers from 2001 that present views on the purpose of the 2.1.2.e committee: "ANSI-RAB NAP White Paper Requirements for an Advisory Committee" and "An Appropriate Role for the 'Governing' or 'Advisory' Board in Management System Registrar Operations."

The ANSI-RAB NAP paper was written in response to discussion at an IAAR meeting about the use and value of a committee, and the inconsistency between ANSI-RAB NAP accreditation auditors and inconsistency between accreditation bodies. At the time (early 2001), ANSI-RAB NAP accreditation auditors to differing degrees believed the purpose of the committee was for the CRB do demonstrate expertise for specific industry sectors, that is, the 39 IAF scope codes. The analysis for the paper resulted in a change in expectations and application by the ANSI-RAB NAP, with the focus to be on use of the committee to safeguard impartiality. Specifically, the ANSI-RAB NAP concluded, "The main purpose of the advisory committee as elaborated by the guidance is provision for participation of all the significantly concerned parties with a direct role in the development and functioning of the certification/registration system to ensure the impartiality of operations."

The paper by Greg Hansa of SGS, written independently of the analysis by the ANSI-RAB NAP, requests "...a more practical interpretation by accrediting bodies" and concludes, "The protection of credibility that is the aim of the guidance is critical to the growth and profitability of the third-party certification/registration industry."

Auditing of a CRB for effective use of the 2.1.2.e committee

An accreditation body should be auditing each accredited CRB to confirm that it is effectively using the 2.1.2.e committee for safeguarding impartiality. It is requested that this be included in the workshop on best audit practices by accreditation bodies.

The last paragraph of the paper by Greg Hansa is a good starting point: "A more pragmatic approach to stakeholder input through the advisory board structure would provide superior credibility for the third-party registration industry. The board should be a tool for use of the certification/registration body in identifying and defining stakeholder issues and should provide a moral compass for the organization. While it would be impossible to represent all potentially interested parties, a standing board with reasonably diverse representation would be appropriate. Where the need arises for input on a specific topic not within the expertise of the standing board, they should be able to draw information from external sources as necessary. In addition, the board would be an appropriate place for the consideration of unsolicited external input. This position does not call for any modification of the existing ISO/IEC Guidance, only a more practical interpretation by accrediting bodies. The protection of credibility that is the aim of the guidance is critical to the growth and profitability of the third-party certification/registration industry."

An accreditation body auditor should confirm that a CRB has a committee, appropriately constituted with no single interest predominating. This means that the number of members that are not employees should be greater than the number of members that are employees, because the employees would constitute a single interest.

Even more important, an accreditation body auditor should fully investigate to determine that the committee is used effectively. The terms of reference or policies governing the committee should clearly elaborate the committee's role in safeguarding impartiality. There should be evidence that the members of the committee understand their role in safeguarding impartiality. Examples of evidence would be meeting minutes or summaries, or records of training or orientation of committee members. The accreditation auditor should seek evidence that the committee is given access to and has reviewed and given advice on the CRB's structure and operations that may impact impartiality. It is difficult to envision much of the operations of a CRB that would not impact impartiality. As per ISO guides and IAF guidance, there is the determination that the CRB and its personnel are not subject to financial pressures would influence objective decisions. The audit management program should prevent any auditor that also consults from being assigned to a client it may have consulted within the prior two-year period. Audit reports should be sufficiently detailed so that the "independent reviewer" has enough information to actually provide added value making the certification decision. The 2.1.2.e committee, with its external members, would be able to add value to a CRB by its analysis of these operations. However, if the CRB does not manage the committee to achieve this purpose, it will not fulfill its intended role.

ANSI-RAB NAP White Paper Requirements for a 2.1.2.e Committee

This paper is a discussion about accreditation requirements for a registrar to have an advisory committee and the purpose and role of this committee.

Note: In general, what is stated about the Guide 62 2.1.2.e committee is also applicable to the Guide 66 4.1.2.e committee.

ISO/IEC Guide 62, items 2.1.2e states: “[the certification/registration body shall] e) have a documented structure which safeguards impartiality, including provisions to assure the impartiality of the operations of the certification/registration body; this structure shall enable the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification/registration system...”

Another clause of ISO/IEC Guide 62 with relevance to advisory committees is item 2.1.2n, which states: “the certification/registration body shall n) have formal rules and structures for the appointment and operation of any committees which are involved in the certification/registration process; such committees shall be free from any commercial, financial and other pressure that might influence decisions (see note 2)”. “NOTES. 2. A structure where members are chosen to provide a balance of interests, where no single interest predominates, will be deemed to satisfy this requirement.”

The following items are the key guidance from IAF Guidance on the Application of ISO/IEC Guide 62:1996, Issue 2, relating to the 2.1.2.e committee.

G.2.1.12. Impartiality and independence of the certification / registration body should be assured at three levels –

1. Strategic and Policy;
2. Decisions on Certification / Registration;
3. Auditing.

The guidance to clause 2.1.2. of ISO/IEC Guide 62 is intended to provide for impartiality and independence at all three levels.

G.2.1.13. Impartiality, as required by clause 2.1.2.a) of ISO/IEC Guide 62 can only be safeguarded by a structure, as required by clause 2.1.2.e) of ISO/IEC Guide 62, that enables “the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification/registration system.”

G.2.1.14. The structure required in clause 2.1.2.e) of ISO/IEC Guide 62 for the safeguarding of impartiality shall be separate from the management established to meet the requirements of clause 2.1.2.c) of ISO/IEC Guide 62, unless the entire management function is performed by a committee or group that is constituted to enable participation of all parties as required in clause 2.1.2.e) of ISO/IEC Guide 62.

G.2.1.15. Conformance with clause 2.1.2.e) of ISO/IEC Guide 62 has the effect of counteracting any tendency on the part of the owners of a certification/registration body to allow commercial or other considerations to prevent the consistent technically objective provision of its service. This is particularly necessary when the finance to set up a certification/registration body has been provided by a particular interest which predominates in the shareholding and/or the board of directors.

G.2.1.16. Clause 2.1.2.e) of ISO/IEC Guide 62, therefore, requires that the documented structure of the certification / registration body has built into it provision for the participation of all the significantly concerned parties. This should normally be through some kind of committee.

This structure shall be formally established by the highest level within the organization either in the documentation that establishes the certification/registration body's legal status or by some other means that prevents it being changed in a manner that compromises the safeguarding of impartiality. Any change in this structure should take into account advice from the committee, or equivalent, referred to in Clause 2.1.2.e).

G.2.1.17. It is always a question of judgement whether all parties significantly concerned in the system are able to participate. What is essential is that all identifiable major interests should be given the opportunity to participate, and that a balance of interests, where no single interest predominates is achieved. Where one sector (e.g., Government, industry etc) provides more than one individual to represent separate aspects of the sector's interests, the fact that they come from the one sector deems them to constitute a single interest.

G.2.1.18. The management responsible for the various functions described in clause 2.1.2.c) of ISO/IEC Guide 62 should provide all the necessary information, including the reasons for all significant decisions and actions, and the selection of persons responsible for particular activities, in respect of certification/registration, to the committee or equivalent referred to in clause 2.1.2.e) of ISO/IEC Guide 62, to enable it to ensure proper and impartial certification/registration. If the advice of this committee or equivalent is not respected in any matter by the management, the committee or equivalent shall take appropriate measures, which may include informing the accreditation body.

G.2.1.19. If the certification/registration body and an applicant or certified / registered body are both part of government, the two bodies should not directly report to a person or group having operational responsibility for both. The certification/registration body shall, in view of the impartiality requirement, be able to demonstrate how it deals with such a case.

Conclusion

The requirements of ISO/IEC Guide 62, IAF Guidance on the Application of ISO/IEC Guide 62 do not require that a registrar have on its advisory committee an individual with technical competence in every IAF scope of accreditation. The registrar must demonstrate that it satisfies the requirement for technical competence, but this may be by its management or other committees.

The main purpose of the advisory committee, as elaborated by the guidance, is provision for participation of all the significantly concerned parties with a direct role in the development and functioning of the certification/registration system to ensure the impartiality of operations.

An accreditation body should be assessing a registrar to ensure it has formal rules and structures for the appointment of the committee, that it defines "all significantly concerned parties," and that this committee has the responsibility and authority, and is fulfilling its purpose of ensuring the impartiality of the operation of the certification/registration system.

This position is also consistent with the sector scheme for aerospace, in which item 6.2 of SAE AIR5359A requires that a member of a registrar's management committee or advisory group have aerospace expertise.