



Heads Up

Issue: 147

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To: ANAB-Accredited and Applicant CBs and Accreditation Assessors

From: Randy Dougherty, Vice President, ANAB

Re: CBs Conducting Second-Party Supplier Audits

Can CBs conduct second-party audits, also known as supplier audits? The answer is yes, as long as such audits do not cause a conflict of interest.

A CB cannot conduct a second-party or supplier audit for a client it has certified for ISO 9001 because this would create a conflict of interest. The definition of management systems consultancy (ISO/IEC 17021:2006, 3.3) is "participation in designing, implementing or maintaining a management system." An organization conforming to ISO 9001:2008 is required to evaluate suppliers (ISO 9001:2008, 7.4). Therefore, if this function is performed by a CB for its certified client, then the CB is participating in the implementation and maintenance of that client's management system.

For a very similar reason a CB cannot conduct internal audits for its certified clients. However, a CB can conduct internal audits for other organizations (non-certified clients). Internal audits are specifically addressed in ISO/IEC 17021:2006, in clauses 5.2.6 and 5.2.7. A CB should apply these same clauses when offering to conduct second-party audits related to ISO 9001.

For management system standards other than ISO 9001, it may or may not be a conflict of interest. This depends on the requirements of the specific standard as it relates to an organization's suppliers. Therefore, ANAB recommends that a CB include this subject in its impartiality analysis and have this reviewed by its impartiality committee.

Note: During the development of ISO/IEC 17021, many of the drafts included internal audits in the definition of management system consultancy, which meant that CBs would be prohibited from conducting them for any company. During the last stages of development, WG 21 took the position that a CB could conduct internal audits for companies that were not their certification clients and, therefore, removed this from the definition of management systems consultancy. WG 21 then determined that this still had to be properly controlled; hence, the wording in clauses 5.2.6 and 5.2.7. The subject of CBs doing second-party audits was not discussed by WG 21 because this emerged as an issue very late in the development of the standard.