

1. PURPOSE AND SCOPE

- 1.1 This document outlines the process for conducting ASI **witness** and **compliance** assessments of a Conformity Assessment Body (CAB) at Certificate Holder (CH) level.
- 1.2 Sections 1 through 7 apply to both assessment types; section 8 is specific to **witness** assessments and section 9 to **compliance** assessments.

2. CHANGE HISTORY

Version number	Date of approval (Effective date)	Description of changes
1	24/03/2016	First publication of a combined procedure for witness and compliance assessments. Incorporation of the reviewed ASI Guidance on Witness Assessments (ASI-GUI-20-105).
1.1	06/02/2017	Replacement of “observation” for “opportunity for improvement (OFI)” to match Assessment Findings Procedure-V5.0.
1.2	16/03/2018	Formatting changes; no content changes.
2.0	22/10/2018	Addition of definition and objective for unannounced compliance assessments and explanation of what happens if CAB not present during compliance assessments. Addition of introductory meeting definition and process. Change of term “unplanned assessments” for “extra assessment”. Addition of ASI deadlines to announce assessments to CABs. Clarification of difference for review of CAB audit report after witness assessment for initial accreditation or for surveillance.
2.1	17 January 2019	Logo and name updated; no content changes.

3. TERMS AND DEFINITIONS

- 3.1 All terms and definitions, where not defined below, are provided in the ASI Glossary (ASI-INF-20-100)
 - **Feedback meeting:** meeting held between ASI and the CH at the **end** of a compliance assessment.
 - **Introductory Meeting:** meeting held between ASI and the CH at the **beginning** of a compliance assessment.
 - **Unannounced compliance assessment:** type of compliance assessment to evaluate a CAB at CH level without previous announcement of the assessment date and time to the CH, neither by ASI nor the CAB. The CAB is previously informed.

4. ASSOCIATED DOCUMENTATION

4.1	Standards and Policies	ISO 17011:2017 ISO 19011:2018
4.2	Procedures, Guidelines	ASI-INF-20-100-ASI Glossary ASI-PRO-20-101-Accreditation ASI-PRO-20-105-Sampling & Surveillance ASI-PRO-20-106-Assessment Findings ASI-PRO-20-104-Complaints

5. GENERAL

5.1 ASI employs two different types of on-site assessments: **witness** and **compliance** assessments. Witness and compliance assessments serve to a) determine the competence of a CAB to conduct conformity assessment activities for a defined scope of accreditation, b) determine the degree of the CAB's conformity with accreditation requirements and c) assess the effectiveness of the accredited certification system and its processes, including decision making.

5.1.1 During a **witness** assessment, ASI observes and evaluates a CAB's audit team as they conduct a full or partial audit (depending on the scope) of a CH's management system against the requirements of the applicable certification scheme owner (hereafter SO). The main purpose is to provide assurance of the competence of the CAB in their ability to perform certification services.

5.1.2 During a **compliance** assessment, ASI conducts an assessment directly on the CH, to evaluate compliance of the CAB's certification processes and CH's management system against certification requirements. The main purpose is to assess the adequacy of a certification decision made by the CAB and the effectiveness of the CAB's processes by comparing the evidence provided in the CAB's previous audit report(s) with the actual situation at the CH level.

5.1.3 Relevant requirements for both assessment types include ASI requirements, SO accreditation and certification requirements, the CAB's own procedures and ISO requirements and related guidance as mandated by the respective SO.

Note: The ultimate responsibility in decision making regarding the continued certification status of the CH remains with the CAB.

5.2 ASI **witness** and **compliance** assessments may be conducted as:

5.2.1 Regular assessments — these are part of the ASI annual assessment schedule.

5.2.2 Extra assessments — these are in addition to the ASI annual assessment schedule and may typically be triggered by a specific concern with CAB performance, such as a complaint, an incident or the outcome of an earlier assessment.

Note: Extra assessments may also be conducted based on a request from a Scheme Owner (SO), in which case the cost shall be borne by the SO.

- 5.3 All assessments shall be announced to the CAB no later than two weeks prior to the assessment date. Only under exceptional circumstances may ASI announce assessments less than two weeks prior to the assessment date.
- 5.4 Nonconformities (NCs) identified during **witness** and **compliance** assessments are raised against a CAB's management system and implemented processes in accordance with the relevant accreditation requirements. NCs cannot be raised against individual auditors, the CAB's audit team as a whole or to a CH.
- 5.5 ASI shall be granted access to all premises, records and documents of the CH relevant to the accreditation scope to be assessed, including personnel records.
- 5.6 Finalized ASI **witness** and **compliance** assessment reports may be shared with SOs, and may be published in accordance with SO and ASI requirements.

6. ASSESSMENT SELECTION CRITERIA

- 6.1 **Witness** and **compliance** assessments are selected by ASI for a number of reasons, all of which are at the sole discretion of ASI, including but not limited to:
 - 6.1.1 Sudden changes in the number or type of certificates issued by a CAB.
 - 6.1.2 Evidence that a CAB raises unusually few NCs over a length of time or number of audits (i.e. in a certain region, or for certain types or sizes of certificates, in comparison to other CABs' audits under similar circumstances).
 - 6.1.3 Evidence that causes ASI to question the correctness of a certification decision.
 - 6.1.4 Changes in SO requirements according to SO guidelines regarding a transition period.
 - 6.1.5 Disputes or incidents that lead ASI to question a CAB's performance.
 - 6.1.6 Negative publicity about a CAB or CH that may be related to the relevant CAB's accreditation.
 - 6.1.7 Direct request by a SO.
 - 6.1.8 New CAB auditors or new accreditation activity or new country of operation for a CAB.
 - 6.1.9 Stakeholder concerns not raised via complaint or incident.
- 6.2 **Witness** assessments may fulfil one or more of the following objectives:
 - 6.2.1 To assess the effectiveness of a CAB's training and competence management system.
 - 6.2.2 To assess the effectiveness of a CAB's audit process and its implementation in practice.
 - 6.2.3 To assess the degree to which the audit findings and reported evidence reflect the audit as conducted.
 - 6.2.4 To witness how a CAB interacts with stakeholders.

Note: Some shortcomings associated with witness assessments are: 1) ASI cannot **actively** verify problem areas due to its observer role and 2) the possible witness effect, potentially

causing CABs to be stricter or better prepared or to bring forward their most experienced auditors when preparing for a witness assessment.

6.3 **Compliance** assessments may fulfil one or more of the following objectives:

- 6.3.1 To address the limitations of witness assessments when necessary.
- 6.3.2 To compare CAB conclusions (audit report/findings) with reality.
- 6.3.3 To assess a specific part of a CAB's audit process or the application of specific procedures.
- 6.3.4 To assess a case in which a CAB certification decision is challenged, but the CAB maintains that its decision was based on a rigorous evaluation.
- 6.3.5 To assess a CAB that is slow in responding or does not respond to an ASI request for CH witness audit dates.
- 6.3.6 To assess risks identified by a SO, ASI or other stakeholder.
- 6.3.7 To respond to negative publicity that puts at risk the reputation of the SO, ASI, the CAB or the CH.

Note: Potential shortcomings of compliance assessments are: 1) the ASI on-site sample and CAB sample may differ and thus may not be directly comparable (this can be mitigated by adhering to the CAB's audit trail established in its most recent assessment) and 2) all audits involve a level of expert judgement, which should be recognized.

6.4 **Unannounced Compliance** assessments may additionally fulfil the following objectives:

- 6.4.1 To follow-up on incidents or complaints which indicate potential fraud in any part of the certification system, including the CAB or CH.
- 6.4.2 To assess situations where there is potential provision of false information, concealment of evidence or misrepresentation of information in any part of the certification system, including the CAB or CH.

7. ASSESSMENT PLANNING

7.1 Prior to each **witness** or **compliance** assessment, ASI shall inform the CAB about the ASI team composition and any observers. A team can include assessors, technical experts and translators (hereafter referred to as ASI team).

- 7.1.1 The CAB may submit a written objection against particular team members only in the case of existing or perceived Conflicts of Interest (COI).
- 7.1.2 ASI shall review the objection and may propose another team member, if deemed justified, to mitigate or eliminate existing or perceived COI.
- 7.1.3 ASI decisions on objections are final. If no mutually acceptable solution is found and if ASI upholds its decision on team composition, the CAB shall be made aware of its option to raise a complaint. Nevertheless, the complaint will stop neither the appointment of the ASI team nor the assessment from moving forward.

- 7.1.4 Notification regarding the ASI team for witness assessments is dependent on the CAB informing ASI in a timely manner about the CAB audit dates.
- 7.2 Prior to any assessment, ASI may request stakeholders to submit comments about the CAB and the CH and may inform them about the assessment date, type and location as mandated by SO requirements or at the discretion of ASI.
- 7.3 Prior to any assessment, ASI is entitled to request relevant documents from the CAB including, but not limited to:
- 7.3.1 Updated schedule of confirmed and planned audits.
 - 7.3.2 Quality management system documentation relevant to the assessment.
 - 7.3.3 Report(s) for the CH(s) to be visited including the initial or re-evaluation report.
 - 7.3.4 Audit agenda and plan.
 - 7.3.5 Audit team and competence records.
 - 7.3.6 Any previous stakeholder comments and complaints.
 - 7.3.7 Relevant CH documents and information about the scheduled audit.
- 7.4 If a CAB or its CH refuses an assessment without justification and without ASI's agreement, ASI shall take measures according to the Accreditation Procedure (ASI-PRO-20-101), the relevant ASI-CAB agreement and the accreditation requirements of the SO.
- 7.5 The CAB shall ensure that its CH informs both the ASI team and CAB team of all applicable safety requirements for the type of assessment to be conducted in advance.

8. WITNESS ASSESSMENTS

8.1 Assessment Preparation – Witness

- 8.1.1 Prior to the audit, the CAB shall notify and confirm the CH that ASI will be present for the purpose of witnessing the CAB and shall confirm this agreement with ASI
- 8.1.2 The scope, agenda and duration of the audit of the CH are set by the CAB and shall be shared with ASI prior to the audit.
- 8.1.2.1 The ASI assessment agenda is defined upon receipt of the CAB's audit agenda. ASI may include reviews of CAB procedures, of previous CH audit reports and stakeholder comments within the scope of its assessment.
 - 8.1.2.2 The CAB shall allocate time in their agenda for the ASI-CAB opening and closing meeting **without the presence of the CH**. The opening meeting shall be held prior to the beginning of the CAB's audit process. The closing meeting shall be held after the audit process has concluded, following the CAB-CH closing meeting, which shall be witnessed by ASI before presenting its findings.

8.2 Conducting the Assessment – Witness

- 8.2.1 During the ASI–CAB opening meeting, ASI shall explain the witness process and the role of the ASI team members.
- 8.2.2 During the CAB–CH opening meeting, the CAB shall explain to the CH that the purpose of the ASI assessment is to evaluate the CAB’s performance and effectiveness of its processes.
- 8.2.3 ASI shall maintain a passive role by observing the CAB’s audit team.
- 8.2.3.1 The ASI team shall not lead, direct, recommend or otherwise seek to influence the CAB’s audit process or the outcome of the CAB’s audit.
- 8.2.3.2 The ASI team may make request(s) to the CAB’s audit team and to the CH for clarification and additional information if necessary, to ensure a clear understanding of the audit process taking place.
- 8.2.3.3 Requests for clarification and more information should be limited to the audit process.
- 8.2.4 The CAB’s audit team witnessed by ASI may include all audit personnel including full time and part time staff of the CAB, observers and individuals that are contracted or subcontracted by or through the CAB.
- 8.2.5 The size of the ASI team will be proportionate to that of the CAB’s team, particularly if the CAB’s audit team pursues different audit trails simultaneously, allowing ASI to witness all relevant parts of the audit.
- 8.2.6 The ASI team shall witness, collect and record information and evidence during the entire assessment, in order to assess that the CAB satisfactorily evaluated the CH against the relevant certification standards.
- 8.2.6.1 If relevant, the ASI team may request to take hard or electronic copies of records with prior consent from both the CAB and CH.
- 8.2.7 The ASI team shall observe the performance of the CAB’s audit team and determine its competence based on their:
- 8.2.7.1 Preparedness for the audit;
- 8.2.7.2 Audit planning, methods, techniques and conformity with ISO 19011;
- 8.2.7.3 Demonstrated knowledge of and adherence to certification requirements for CABs and CHs;
- 8.2.7.4 Demonstrated knowledge of and adherence to the CAB's own management system documentation and procedures;
- 8.2.7.5 Conformity to the requirements and recommendations of the relevant SO, relevant ISO Guidance, relevant IAF Guidance and, as applicable, any relevant sector specific accreditation requirements;
- 8.2.7.6 Knowledge of the nature of the organization being audited;
- 8.2.7.7 Management of the audit outcomes; and

- 8.2.8 The CAB's audit team should inform the ASI team of any identified NCs throughout the audit.
- 8.2.9 If ASI witnesses NCs in the scope of the CAB's audit which do not appear to have been detected or reported during the audit or communicated to the CH at the CAB's closing meeting, ASI shall issue a finding to the CAB for inadequate or insufficient evaluation of the relevant certification requirement.
- 8.2.10 ASI should raise findings related to training and competence of the CAB's audit team against requirements for the CAB's training program and competence management system.
- 8.2.11 ASI shall hold a closing meeting with the CAB as soon as possible after the CAB's closing meeting with their client.
- 8.2.11.1 The closing meeting may be held at the CH's premises, but without the presence of the CH.
- 8.2.11.2 The ASI team shall present the findings with potential grading to the CAB's audit team as per the Assessment Findings Procedure (ASI-PRO-20-106).
- 8.2.11.3 Follow up of NCs shall occur between ASI and the CAB, and if applicable, the CAB shall follow up directly with the CH.

8.3 Post-Assessment Activities – Witness

- 8.3.1 Following the ASI-CAB closing meeting, ASI shall write a Summary of Findings (SoF) and send it to the CAB.
- 8.3.2 Timelines regarding SoF, Errors of Fact (EoF), ASI Technical review and final assessment report are established in the Accreditation Procedure (ASI-PRO-20-101).
- 8.3.3 ASI shall prepare a witness assessment report that summarizes:
- 8.3.3.1 Areas covered by the assessment as determined by the CAB agenda and auditor.
- 8.3.3.2 Both positive and negative remarks regarding the implementation and effectiveness of the CAB's procedures and system.
- 8.3.3.3 Identified NCs for the CAB supported by objective evidence.
- 8.3.3.4 Any disagreement or divergent opinions with the CAB.
- 8.3.3.5 Previous years' CAB report(s) and checklist(s), if relevant.
- 8.3.3.6 Any relevant stakeholder feedback and comments provided by the CAB.
- 8.3.4 In cases in which the NCs issued by the CAB to the CH are of significant concern (e.g. system breakdown/suspension, system credibility issues, illegality issues), ASI may:
- 8.3.4.1 Follow up in the next office assessment and review the closure of NCs.
- 8.3.4.2 Carry out an onsite NC verification on the CH.

8.4 Post-assessment CAB Report Review

- 8.4.1 For applicant CABs, the witness assessment shall be concluded after the final CAB audit report and relevant CAB records of technical review and decision-making are sent to ASI. If the CAB audit report is not provided to ASI within 60 days of the witness assessment, ASI may organize a separate assessment to review the CAB report.
- 8.4.2 For accredited CABs, ASI may request to review a CAB's final audit report to verify its reliability to reflect the actual audit findings and conclusions.
- 8.4.2.1 ASI may review reports either during the next CAB's office assessment or as off-site desk reviews.
- 8.4.3 ASI shall consider the following criteria during the report review to verify that the CAB's audit report contains sufficient information documenting compliance and non-compliance to the applicable SO requirement(s):
- 8.4.3.1 Fair Presentation: Verify that audit findings, conclusions and reports truthfully and accurately reflect the audit activities.
- 8.4.3.2 Accuracy: Verify that all audit findings identified on-site were fully recorded and accurately reflect the audit evidence.
- 8.4.3.3 Completeness: Determine whether the audit evidence presented in the report is sufficient and appropriate to support an informed certification decision.
- 8.4.3.4 Repeatability: Verify that the report is sufficient for another auditor or audit team to use as a means to repeat the audit and obtain the same findings.
- 8.4.3.5 Consistency: Verify that the report supports and is consistent with the audit objectives.
- 8.4.3.6 Independence: Verify that the auditor had no conflict of interest in reaching the conclusions presented in the report.
- 8.4.3.7 Changes made since closing meeting: Verify that the report presents an explanation of any discrepancies from the information presented at the closing meeting to evaluate the decision-making process.

9. COMPLIANCE ASSESSMENTS

9.1 Assessment Preparation – Compliance

- 9.1.1 The scope, agenda and duration of the assessment are set by ASI and shall be shared with both the CAB and the CH prior to the assessment.
- 9.1.1.1 The ASI agenda shall include an ASI-CAB opening and closing meeting **without the presence of the CH** as well as ASI-CH introductory and feedback meetings **with the presence of the CAB observer**.
- 9.1.2 The CAB shall be informed of the assessment and encouraged to attend as an observer. The CAB's participation is voluntary but is strongly recommended.
- 9.1.3 Prior to the assessment, ASI shall inform the CAB regarding the following:

- 9.1.3.1 Objectives of the compliance assessment
 - 9.1.3.2 Proposed assessment agenda
 - 9.1.3.3 If the assessment is a regular or an extra assessment.
 - 9.1.3.4 If the assessment is based on an incident or a complaint
 - 9.1.3.5 Proposed assessment dates for the CAB to confirm with its CH
 - 9.1.3.6 Explanation that findings are raised to the CAB and not to the CH
 - 9.1.3.7 Further information depending on the technical scope
- 9.1.4 In case of an unannounced compliance assessment, the communication to the CAB shall also state that the CAB shall not inform the CH of the assessment.
- 9.1.5 If the CAB is not present during a compliance assessment, the following applies:
- 9.1.5.1 An opening meeting with the CAB shall be arranged on the working day before the assessment.
 - 9.1.5.2 A closing meeting with the CAB shall be held off-site within two working days after the assessment finish date. If no closing meeting can be arranged, the SoF shall be sent to the CAB and the closing meeting shall be waived.
- 9.1.6 If a CAB is not present during the assessment and does not join the offered remote closing meeting with no justification, no EoF will be accepted on the findings in question.
- 9.1.7 The CAB shall notify the CH of the objectives and implications of the ASI compliance assessment based on the information provided by ASI.
- 9.1.7.1 The CAB shall explain to the CH that ASI findings are raised to the CAB and not the CH.
 - 9.1.7.2 The CAB shall confirm its client's agreement to the assessment with ASI.
- 9.1.8 The CAB shall not conduct its own surveillance audit of the CH simultaneously.
- 9.1.9 ASI compliance assessments shall not replace the regular CAB surveillance audits of the CH. These remain the responsibility of the CAB.
- 9.1.10 Compliance assessments are not to supersede or to be conducted in place of a CAB's or ASI's complaints process.
- 9.1.11 ASI shall not conduct a compliance assessment as a means to avoid the filing of a formal complaint by a CAB, CH or other party.

9.2 Conducting the assessment – Compliance

- 9.2.1 During the ASI-CAB opening meeting, the ASI team shall explain the assessment objective and process as well as the roles of ASI and the CAB observer. This meeting shall take place before the introductory meeting described in 9.2.2.

- 9.2.2 During the ASI-CH introductory meeting, ASI shall explain the following to the CH:
- 9.2.2.1 that the purpose of the assessment is to evaluate the CAB's performance and effectiveness of its processes;
 - 9.2.2.2 that, if applicable, the assessment is a follow-up to information ASI received through means of incidents, complaints, transaction verification or from other sources;
 - 9.2.2.3 that NCs, if any, will be raised against the accredited CAB, based on accreditation requirements or its accredited system;
 - 9.2.2.4 that the CAB will be informed of any deficits identified at the level of the CH and the CAB will have to address these in accordance with its accredited procedures;
 - 9.2.2.5 that ASI will collect objective evidence during the assessment and that documents or other evidence may be taken off-site for follow-up with the CAB;
 - 9.2.2.6 that ASI assessors and all other staff are bound by confidentiality agreements;
 - 9.2.2.7 that ASI has the right to access the premises and documentation relevant for the certification as per the ASI-CAB contracts and as per the CAB-CH contracts.
- 9.2.3 If the CAB is not present for the ASI-CH introductory meeting the CH shall be granted the opportunity to contact the CAB for further information or clarification.
- 9.2.4 If the CAB is present, the ASI team shall have an active role and the CAB shall have an observer's role:
- 9.2.4.1 The CAB observer shall not lead, direct, recommend or otherwise seek to influence ASI's compliance assessment process or the outcome of ASI's compliance assessment.
 - 9.2.4.2 The CAB observer may make request(s) to the ASI team for clarification and additional information to ensure a clear understanding of the assessment process taking place.
 - 9.2.4.3 Requests for clarification and more information should be limited to the assessment process and ASI procedures.
- 9.2.5 In case of a regular assessment, ASI shall evaluate the CH against a sample of applicable certification requirements as deemed necessary and relevant by ASI.
- 9.2.6 In case of an extra assessment, ASI may limit its evaluation to those issues from the complaint or incident or ASI's CAB performance evaluation which triggered the assessment
- 9.2.7 If the CAB is present during the assessment, the ASI-CAB closing meeting shall be held before the ASI-CH feedback meeting described in 9.2.8 in order to resolve any diverging opinions concerning the findings. Any unresolved issues shall be recorded.
- 9.2.7.1 The ASI team shall present its findings with potential grading to the CAB's audit team as per the Assessment Finding Procedure (ASI-PRO-20-106).
 - 9.2.7.2 The CH shall not be present for this meeting.

- 9.2.8 During the ASI-CH feedback meeting, ASI shall provide feedback to the CH and explain deficits and deviations from the applicable certification requirements in a general context with no reference to grading. It shall be explained that the follow-up to identified deficits and deviations is the responsibility of the CAB.
- 9.2.9 Follow up of NCs shall occur between ASI and the CAB, and if applicable, the CAB and the CH.
 - 9.2.9.1 If ASI identifies issues at CH level that are directly related to the CAB's performance, a NC shall be issued to the CAB.
 - 9.2.9.2 If ASI identifies issues at CH level that are not related to the CAB's performance, ASI shall raise an opportunity for improvement (OFI) to the CAB for direct follow up with the CH.

Note: These may be issues at CH level, which the CAB may not have been able to identify in past assessments by applying a reasonable sampling level; or, isolated issues, and shortcomings, which have occurred demonstrably after the CABs most recent audit of the CH.
 - 9.2.9.3 The CAB shall react to ASI findings based on their criticality and decide on the appropriate follow up method at CH level. A CAB's response to the ASI findings shall include how these were followed up at CH level(s) and how corrective and preventive actions were implemented to address these across all CHs considered affected by the findings.
 - 9.2.9.4 During the next CAB office assessment, ASI shall assess how the compliance assessment results were followed up by the CAB based on 9.2.9.3.

9.3 Post-Assessment Activities – Compliance

- 9.3.1 ASI shall write a SoF and send it to the CAB as per the Accreditation Procedure (ASI-PRO-20-101) .
- 9.3.2 The final compliance assessment report should concentrate on the performance of the CAB rather than the CH.
- 9.3.3 Both the SoF and the final assessment report shall be submitted to the CAB and not to the CH.
- 9.3.4 ASI may carry out an on-site NC verification at either the CAB or the CH to verify that the identified issues have been solved.

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