

Dutch Accreditation Council (RvA)

Management of extraordinary events or circumstances affecting RvA accredited bodies and their customers

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A RvA-Explanatory note describes the policy and/or the procedures of the RvA concerning a specific field of accreditation. In case the policy and/or procedures for a specific field of accreditation as described in a RvA Explanatory note, is documented by EA, ILAC or IAF, the RvA will bring its policy and procedures in line with the EA, ILAC or IAF-document.
A current version of the Explanatory is available through the website of the RvA. (www.rva.nl).

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1 Introduction

- Chapter 3 of this document defines the RvA policy regarding actions to be taken by accredited certification bodies (CBs) in the event of any situation preventing access to certified clients, such that planned certification activities cannot take place. These situations include events preventing access to specific clients; general access to a geographical area (including critical locations); or directly affecting the CAB's ability to operate.
- Chapter 4 of this document defines the RvA policy where accredited Conformity Assessment Bodies (CABs; including certification and inspection bodies and laboratories) themselves are affected by situations that interfere with RvA oversight activities. These situations includes events preventing access to the CAB or to locations where witness activities are necessary or the general ability of the CAB to operate.
- This document takes into account IAF Informative Document IAF ID 3: 2011 "Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations". For further guidance refer to this document available from <https://www.iaf.nu/>.

2 Definitions

Conformity Assessment Body (CAB)

Body that performs conformity assessment activities and that can be the object of accreditation (3.1).

(Source: ISO/IEC 17000:2004, 2.5, modified)

In the context of this document this pertains to all bodies accredited by RvA.

Certification Body (CB)

Third-party conformity assessment body operating certification schemes.

(Source: ISO/IEC 17065: 2012)

In the context of this document this pertains to bodies that operate third-party attestation related to products, processes, systems or persons.

Extraordinary event or circumstance

A circumstance beyond the control of the organization, commonly referred to as "Force Majeure" or "act of God". Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters.

(Source: IAF ID 3: 2011)

3 Events or circumstances affecting certified organizations; required actions by the Certification Body (CB)

3.1 General

For each case affected by an extraordinary event or circumstance, the Certification Body (CB) will need to evaluate the risks presented to the organization and to the certification concerned.

In the first instance it will be necessary to evaluate the extent of any impact of the situation on the ability of the certified organization to continue to operate in accordance with the certification requirements. The CB will need to take account of the extent of the impact on the certified organization or product and to determine whether it is possible for certification to be maintained under the circumstances.

For guidance regarding the content and extent of this evaluation please refer to IAF ID 3: 2011 chapter 3 "*Extraordinary event or circumstance affecting a certified organization*".

The outcome of the review must be recorded and must be available for assessment by RvA on demand.

CBs that have to deal with an extraordinary event or circumstance that could affect RvA accredited certificates, must inform their RvA contact person of the existence of this event or circumstance within one month. The CB should be able to provide the following information on request of the RvA:

- Scope and extent of the affected services and business areas and sites,
- Number of affected clients,
- When the CB will be able to function normally within the current scope of accreditation,
- Alternative assessment methods which will be applied like e.g. remote assessments (IAF MD 4) or desktop reviews of documents submitted,
- Alternative programs planned to maintain confidence in the certified clients systems during the period that access cannot be gained,
- Planning of the re-establishment of the regular oversight activities according to CB oversight plans when the normal situation is restored.

Furthermore the CB should inform their RvA contact person of any cases that, taking into account projected timescales for the event, may result in a high risk to the integrity of the certificate concerned.

3.2 Initial certification and scope extensions

Initial certification and extension of existing scopes can only be operated when the full planned audit and appraisal is possible as in such cases it is not possible to support a certification decision with existing information originating from previous oversight activities.

Theoretically it might be possible to conduct all these activities off-site.

Therefore, during a period when due to extraordinary circumstances, on site operation and auditing is not possible, initial certification and scope extension is only possible if all above mentioned activities can be done remotely in a satisfactory manner.

3.3 Surveillance activities (if applicable)

Surveillance activities must be completed as quickly as possible once the emergency status has been lifted and as soon as the normal situation and operation is restored. Wherever possible the surveillance must take place within the current certification year. Subsequent surveillance activities should continue in line with the original program.

In case of the first surveillance audit after initial certification a postponement of the audit should not exceed 6 months (18 months from date of initial certification).

In case of subsequent surveillance audits a postponement of the audit should not exceed 6 months.

Extended periods between surveillance visits as specified above may result in a need for additional surveillance visits for the remainder of the certification cycle.

During postponement the CB should consider other means of monitoring that may be available such as remote assessments (refer to IAF MD 4), desktop reviews of documentation submitted or other methods.

3.4 Re-certification

If based on information gathered (for guidance see also IAF ID 3: 2011 chapter 3 "*Extraordinary event or circumstance affecting a certified organization*"), there is sufficient documented proof to provide confidence that the certified management system is effective, the CB may consider to extend the certification for a period not exceeding 6 month beyond the original expiry date.

If the recertification assessment cannot be undertaken within 6 months the certificate should be suspended. In this case the regular policy of the CB in case of suspension will be applicable.

3.5 Records and information to the RvA

The CB will maintain full records of actions and deviations from the established certification program, together with the rationale behind decisions on actions taken. These records shall be made available for RvA to review upon demand.

4 Events or circumstances affecting the accreditation of Conformity Assessment Bodies (CABs)

4.1 General

An extraordinary event affecting the CAB or laboratory may temporarily prevent RvA (the Accreditation Body) from carrying out planned assessments on site. When these situations occur, ABs and CABs operating within their accreditation need to establish a reasonable planned course of action.

Possible actions that can be considered include postponement of planned assessments or implementation of alternative assessment methods like e.g. remote assessments or desktop reviews of documents submitted.

4.2 Initial accreditation and scope extension

Initial accreditation assessments and assessments for scope extensions, for which on site assessment is necessary, will not be conducted during a period when due to extraordinary circumstances, on site assessment is not possible.

4.3 Surveillance activities

Surveillance activities will be completed as quickly as possible once the emergency status has been lifted and as soon as the normal situation and operation is restored. As on site assessments should be performed at least every two years (ISO/IEC 17011 article 7.9.3) postponement of the assessment should not be such that this period is exceeded.

Extended periods between surveillance assessments as specified above may result in a need for additional surveillance assessments for the remainder of the accreditation cycle.

During postponement RvA will consider alternative means of monitoring that may be available such as remote assessments, desktop reviews of documents submitted or other methods.

4.4 Re-accreditation

An accreditation cycle should not be longer than five years (ISO/IEC 17011 article 7.9.1). Postponement of the assessment should not be such that this period is exceeded. Within this limit RvA can consider to grant a prolongation of an existing accreditation.

Such a prolongation may result in a need for additional surveillance assessments for the remainder of the accreditation cycle.

During prolongation RvA will consider alternative means of monitoring that may be available such as remote assessments, desktop reviews of documents submitted or other methods.

4.5 Breakdown of the CAB

4.5.1 Temporary breakdown

In case of a temporary breakdown of the CAB, when the body or part thereof, is not able to perform any activities during a period not exceeding 6 months, it is not required to apply for voluntary suspension. In such cases the CAB is required to exercise proper control when restarting operations, e.g. regarding equipment and resources. Such a breakdown and restart may result in the need for additional assessment(s) by RvA.

4.5.2 Permanent breakdown

In case of a permanent breakdown of the CAB (e.g. due to the inability to recuperate from an extraordinary event or circumstance that affected the CAB's business, or due to liquidation or bankruptcy) the CAB is obliged to inform RvA immediately and proper action will be initiated according to RvA regulations and procedures.

5 Additional information

- The International Accreditation Forum (IAF) has launched a FAQ site regarding questions asked in relation to the outbreak of the corona virus. This site can be addressed on <https://iafaq.com/>
- Up to date information regarding the policies and operations of RvA is available from <https://www.rva.nl/nieuws>

6 Changes with regard to the previous version

Compared to version 2 dated 12-03-2020 the following significant change has been made:

- Alignment of RvA's policy described in section 3.2 with the IAF policy.
- Change in section 4.2 concerning the initial and scope extensions.
- Addition of chapter 5 with some additional information.