

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

This document explains the RvA policy when extraordinary events or circumstances prevent the conformity assessment bodies (CABs) to conduct conformity assessment activities according to the defined systems, programs or schemes. These policies apply for example when these events or circumstances prevent the CAB to access locations or objects of clients for audits or inspections, or when these events or circumstances directly affect the CAB's ability to operate.

The policy is explained for Certification bodies (CBs) in chapter 3 and Inspection bodies (IBs) in chapter 4. For activities of CABs that are required by law, the policy is explained in chapter 5. The role that scheme-owners are expected to have in these events or circumstances is explained in chapter 6.

In addition the document explains in chapter 7 the general policy of the RvA in case the events or circumstances prevents RvA to conduct the accreditation activities according to the regular procedures.

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/>. Although IAF ID 3 was primarily written for management systems certification, parts may also be relevant for other CABs. The RvA also recommends CABs to take note of the document IAF MD 4:2018 "*IAF Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes*".

This document may be revised when additional guidance or criteria from, for example, EA, IAF or ILAC are published.

2 Definitions

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 Certification Body

3.1 General

For each situation affected by an extraordinary event or circumstance, the Certification Body (CB) should evaluate the risks presented to its organization and to the certification(s) 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(s) to continue to operate in accordance with the certification requirements. The CB should take into account the extent of the impact on the certified organization(s) or product(s) and determine whether it is possible for certification(s) 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 should be recorded and 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, shall inform their RvA contact person of the occurrence of this event or circumstance within one month.

Furthermore the CB shall 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,
- The communication with external scheme owners about the extraordinary event or circumstance and the measures the CB is expected to take (if applicable); see chapter 6,
- 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 of the CB when the normal situation is restored.

Furthermore the CB shall 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 certificates concerned.

Note: The RvA does not require submission of the plans for RvA-approval beforehand, but instead will assess these plans later during regular RvA assessments. Thus CBs are expected to be able to justify these plans and to implement them without undue delay.

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 (depending on amongst others the (setup and complexity of system of) customer, scheme requirements, CAB).

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

3.3 Surveillance activities (if applicable)

If the objectives of a surveillance assessment can be achieved by an remote assessment, this is acceptable.

Surveillance activities should be completed as quickly as possible once the emergency status has been lifted and as soon as the normal situation is restored. Wherever possible the surveillance should 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 six (6) months (18 months from date of initial certification).

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

These 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 six (6) months beyond the original expiry date.

If the re-certification assessment cannot be undertaken within six (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 shall maintain full records of actions, evaluations 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 Inspection Body

4.1 General

For each situation affected by an extraordinary event or circumstance, the Inspection Body (IB) should evaluate the risks presented to its organization and to the inspections concerned, considering at least the following:

- The safety and health of the persons involved and the environmental impacts;
- The possibility to achieve the objectives of the inspections;
- The validity of alternative conditions and methods;
- Requirements of regulators and scheme owners (if applicable); see chapter 6;
- The requirements of ISO/IEC 17020 for example concerning the communication to the clients and recording and reporting changes in methods.

The outcome of the evaluation should be recorded and be available for assessment by RvA on demand.

IBs that have to deal with an extraordinary event or circumstance that could affect RvA accredited inspections, shall inform their RvA contact person of the occurrence of this event or circumstance within one month.

Furthermore the IB shall be able to provide the following information on request of the RvA:

- Extent of the affected services;
- Number of affected clients;
- When the IB will be able to function normally within the current scope of accreditation (when the normal situation is restored);
- Alternative inspection methods which will be applied.

Note: The RvA does not require submission of the plans for RvA-approval beforehand, but instead will assess these plans later during regular RvA assessments. Thus IBs are expected to be able to justify these plans and to implement them without undue delay.

4.2 Records and information to the RvA

The Inspection Body shall maintain full records of actions, evaluations and deviations from the original inspection methods, together with the rationale behind decisions and actions taken. These records shall be made available for RvA to review upon demand.

5 Conformity assessment required by law

Where the conformity assessment is required by law, the extraordinary event or circumstance may result in a situation that the CAB's client and/or the CAB itself cannot comply with legal requirements. In this case the CAB should contact the responsible authorities or for guidance and instructions on the conformity assessment activities. The regulators are expected to take the lead in development of guidance and instructions in case of an extraordinary event or circumstance.

Where harmonisation of CABs is a legal requirement, the CABs should take joint action to develop guidance and instructions in the case of an extraordinary event or circumstance. The notified body coordination group as mentioned in Decision (EC)768/2008 is an example of such harmonisation.

6 Role of scheme owners

Where the CAB operates a scheme from an external scheme owner, the CAB should follow the decisions of the scheme owner on how to deal with the extraordinary event or circumstance. The external scheme owners are expected to take the lead in development of guidance and instructions in case of an extraordinary event or circumstance.

If the extraordinary event or circumstance has an effect on the possibility to comply with the requirements of the conformity assessment scheme, the CAB should contact the scheme owner for guidance on the fulfilment of requirements.

7 Accreditation of Conformity Assessment Bodies

7.1 General

An extraordinary event affecting the accredited CAB may temporarily prevent the RvA from carrying out planned assessments on site. When such situation occurs, the RvA will establish an action plan.

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.

It is also possible to witness an audit, inspection or on-site test remotely, provided it can be witnessed in full. The scope of the assessment must therefore be the same. The CAB is expected to determine whether an audit, inspection or on-site test can be carried out entirely or partly remotely.

7.2 Initial accreditation and scope extension

Initial accreditation assessments and assessments for scope extensions that can¹ be carried out entirely remotely can proceed if there is consent of all parties involved. If on site assessment is necessary, these assessments will not be conducted and will be postponed.

7.3 Surveillance activities

Surveillance assessments that can¹ be carried out entirely remotely can¹ proceed if there is consent of all parties involved.

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 assessments should be performed on site 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 a period when, due to exceptional circumstances, on-site assessment is not possible RvA will consider alternative means of monitoring that may be available such as remote assessments, desktop reviews of documents submitted or other methods.

7.4 Reassessment

Reassessment that can¹ be carried out entirely remotely can proceed if there is consent of all parties involved.

An accreditation cycle should not be longer than five years (ISO/IEC 17011 article 7.9.1). Postponement of the reassessment 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 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.

¹ "can" not only refers to the possibility, but to possibility under the condition that the assessment objectives can be fulfilled (the RvA has to be able to sufficiently determine if the CAB fulfils the relevant requirements).

7.5 Breakdown of the CAB's activities

7.5.1 Temporary breakdown

In case of a temporary breakdown of the CAB, when the body or part thereof, is not able to perform activities during a period not exceeding six (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.

7.5.2 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.

8 Additional information

- The European Accreditation organisation (EA) has published specific information through the News section on <https://european-accreditation.org/>
- 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://iaffa.com/>
- Up to date information regarding the policies and operations of RvA is available from <https://www.rva.nl/en/news> and <https://www.rva.nl/en/measures>.

9 RvA guidance on the time after the first six months of the Covid-19 pandemic

The table below gives guidance based on different scenario's. These scenario's uses the starting point that the currently accepted methods for extension of the certification activities are depleted. *So for all scenario's read that these take place after the one-time extension of six (6) months.* The six (6) months extension starts at the initial planning of the surveillance activity or recertification assessment.

In these special circumstances a maximum of 18 months is possible between the initial audit and a first surveillance, between two (2) surveillances, or between a surveillance audit and the recertification audit (for management system certification). For other certification schemes the maximum of six (6) months also applies, but the details of surveillance (if applicable) and recertification are laid down in the scheme requirements.

This means that the RvA does not accept the explanation of IAF FAQ31 (which seems to allow an additional extension in the case of recertification), because we do expect that the confidence in the continued fulfilment of the requirements by the object of certification, can no longer be justified.

	Scenario description Below restrictions should all be read as "Due to Covid19"	Actions required from Conformity Assessment Body (CAB)		
		Initial/extension of scope	Initial/extension of scope	Initial/extension of scope
1	Client does not carry out any activities (e.g. no demand for product/service travel agencies or complete closure of universities).	Not accepted.	The certificate shall be temporarily suspended ⁽¹⁾ . Re-instatement of certificate is possible based on regular maintenance activities (original cycle maintained).	The certificate expires. Re-instatement of certification is possible after resumption of activities within 12 months from the original extension date with a re-certification audit. The re-instated certificate shall indicate the gap in the certification and the original cycle shall be maintained. After this date, a full initial audit shall be performed.

	Scenario description Below restrictions should all be read as “Due to Covid19”	Actions required from Conformity Assessment Body (CAB)		
		Initial/extension of scope	Initial/extension of scope	Initial/extension of scope
2	Client is (temporarily) carrying out only part of activities in scope of certificate. According to the CAB’s regular assessment programme, these activities that are not carried out, should have to be assessed (taking the scheme requirements into account)	Certification only possible for scope indicating activities carried out and confirmed in audit.	The scope of the certificate shall be (temporarily) reduced. Re-instatement of the original scope is possible, based on regular maintenance activities (original cycle is maintained).	The certificate is reduced in scope (provided that certification activities for the rest of the scope have been completed). Re-instatement of the original scope of certification is possible after resumption of activities within 12 months from the original extension date with a re-certification audit. The re-instated certificate shall indicate the gap in the certification and the original cycle shall be maintained.
3	Client does carry out activities, but cannot receive visitors (not allowed or required social distancing is physically not possible). The scheme and/or the CAB’s risk analysis demonstrate that remote assessment is insufficient to achieve audit objectives.	Certification only possible after assessment objectives have been achieved.	CAB shall consider alternative methods (e.g. video conferencing, mobile cameras or other ICT tools). If assessment objectives can’t be achieved using alternative tools (or scheme/client prohibits the use), the certificate shall be temporarily suspended ⁽¹⁾ . Re-instatement of the original scope is possible, based on regular maintenance activities.	CAB shall consider alternative methods (e.g. video conferencing, mobile cameras or other ICT tools). If assessment objectives can’t be achieved using alternative tools (or scheme/client prohibits the use), after an extension period of six (6) months, the certificate expires. Re-instatement of original scope of certification is possible after resumption of activities within 12 months from the original extension date with re-certification audit. The re-instated certificate shall indicate the gap in the certification and the original cycle shall be maintained.
4	Client is carrying out activities with higher risks to health and safety (e.g. health care)	CAB shall consider additional protective measures (PPE).	CAB shall consider additional protective measure (PPE).	CAB shall consider additional protective measures (PPE).

	Scenario description Below restrictions should all be read as “Due to Covid19”	Actions required from Conformity Assessment Body (CAB)		
		Initial/extension of scope	Initial/extension of scope	Initial/extension of scope
5	Client does carry out activities, and can receive CAB, but due to travel restrictions CAB cannot visit client (e.g. in case of travel or quarantine restrictions). Scheme and/or CAB risk assessment indicate that audit objectives cannot be achieved with remote audit techniques only.	CAB may consider co-operation with local CAB.	CAB shall consider co-operation with local CAB. If not possible, certificate should be temporarily suspended ⁽¹⁾ .	CAB shall consider co-operation with local CAB. If not possible, certificate shall expire.
6	Client does carry out activities, but has restrictions due to Covid-19 infections having been found out in personnel	Certification only possible after achievement of audit objectives. CAB shall consider additional protective measures (PPE).	Only regular postponement exceptions accepted, i.e. no further extension possible. CAB shall consider additional protective measures (PPE).	Only regular postponement exceptions accepted, i.e. no further extension possible. CAB shall consider additional protective measures (PPE).
7	Client cannot receive CAB due to increased work load related to the Covid-19 pandemic (e.g. hospitals, health centres, research or production facilities of Covid-19 abatement/control materials).	Certification only possible after achievement of audit objectives.	When conditions as described in this scenario can be objectively confirmed by CAB, an additional suspension of audit activities (up to one (1) year in total) is accepted.	When conditions as described in this scenario can be confirmed by CAB objectively, additional extension of the certificate (up to one (1) year in total) is accepted.

⁽¹⁾ Temporary suspension: client shall during this suspension, either not actively use certification or indicate that certification is (temporarily) suspended due to Covid19 crisis. A suspension/withdrawal enacted due to Covid-19, may be lifted based on regular surveillance/recertification activities, upon which the original cycle is maintained.

10 Changes with regard to the previous version

Compared to version 5 dated 07-05-2020 the following significant changes have been made:

- Overall editorial changes,
- Addition in chapter 3 that completely remote assessment is possible under conditions for both recertification and surveillance assessments ,
- Addition in chapter 7 that completely remote assessment is possible under conditions for both recertification and surveillance assessments;
- Addition of chapter 9 RvA guidance on the time after the first six months of the Covid-19 pandemic