



IAF Mandatory Document

Witnessing Activities for the Accreditation of Management Systems Certification Bodies

Issue 1

(IAF MD 17:2015)

The International Accreditation Forum, Inc. (IAF) facilitates trade and supports regulators by operating a worldwide mutual recognition arrangement among Accreditation Bodies (ABs) in order that the results issued by Conformity Assessment Bodies (CABs) accredited by IAF members are accepted globally.

Accreditation reduces risk for business and its customers by assuring that accredited Conformity Assessment Bodies (CABs) are competent to carry out the work they undertake within their scope of accreditation. Accreditation Bodies (ABs) that are members of IAF and the CABs they accredit are required to comply with appropriate international standards and the applicable IAF application documents for the consistent application of those standards.

ABs that are signatories to the IAF Multilateral Recognition Arrangement (MLA) are evaluated regularly by an appointed team of peers to provide confidence in the operation of their accreditation programs. The structure and scope of the IAF MLA is detailed in IAF PR 4 - Structure of IAF MLA and Endorsed Normative Documents.

The IAF MLA is structured in five levels: Level 1 specifies mandatory criteria that apply to all ABs, ISO/IEC 17011. The combination of a Level 2 activity(ies) and the corresponding Level 3 normative document(s) is called the main scope of the MLA, and the combination of Level 4 (if applicable) and Level 5 relevant normative documents is called a sub-scope of the MLA.

- The main scope of the MLA includes activities e.g. product certification and associated mandatory documents e.g. ISO/IEC 17065. The attestations made by CABs at the main scope level are considered to be equally reliable.
- The sub scope of the MLA includes conformity assessment requirements e.g. ISO 9001 and scheme specific requirements, where applicable, e.g. ISO TS 22003. The attestations made by CABs at the sub scope level are considered to be equivalent.

The IAF MLA delivers the confidence needed for market acceptance of conformity assessment outcomes. An attestation issued, within the scope of the IAF MLA, by a body that is accredited by an IAF MLA signatory AB can be recognized worldwide, thereby facilitating international trade.

INTRODUCTION TO IAF MANDATORY DOCUMENTS

The term “should” is used in this document to indicate recognised means of meeting the requirements of the standard. A Certification Body (CB) can meet these in an equivalent way provided this can be demonstrated to an Accreditation Body (AB). The term “shall” is used in this document to indicate those provisions which, reflecting the requirements of the relevant standard, are mandatory.

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WITNESSING ACTIVITIES FOR THE ACCREDITATION OF MANAGEMENT SYSTEMS CERTIFICATION BODIES

PREAMBLE

This document is mandatory for the consistent application of the relevant clauses of ISO/IEC 17011:2004 Conformity assessment - General requirements for accreditation bodies accrediting conformity assessment bodies.

This document applies to the accreditation of MS (Management Systems) CBs (Certification Bodies) and shall be used for all MS under the IAF MLA, except for those provisions that conflict with what is established in applicable standards (e.g. ISO/TS 22003, IAF MD 8:2011, ISO 27006), other IAF documents, specifications set by SOs (Scheme Owners) or regulators, and legislation.

Sections 4 & 5 are specific to the accreditation of QMS CBs and EMS CBs.

0 INTRODUCTION

0.1 According to ISO/IEC 17011:2004, §7.5.6 and §7.7.3, Accreditation Bodies (ABs) are also required to establish a sampling procedure to witness a representative number of examples of conformity assessment services and staff to ensure proper evaluation and provide assurance of the competence of the conformity assessment bodies across the scope of accreditation.

0.2 In order to comply with these requirements of ISO/IEC 17011 (and other normative documents like application documents developed by IAF and legal requirements where relevant), ABs perform file review and witnessing of MS CBs activities, namely audits in the certification process (hereafter referred to as audits).

0.3 The intended audience for this document is MS CBs, ABs and their peer evaluators, regulators and scheme owners (SO), and other stakeholders that rely upon the credibility of the IAF MLA for the purpose of their activities.

1 DEFINITIONS

For the purpose of this document, the definitions below are applicable.

1.1 Witnessing

Observation of the CAB carrying out conformity assessment services within its scope of accreditation (clause 3.21 of ISO/IEC 17011:2004)

Witnessing of an audit is an activity performed by an AB whereby it observes, without interfering and influencing, an audit performed by a CB audit team. Depending upon the objectives of the witnessing, the complete audit may be observed or just relevant parts of the audit. The witnessing is done on-site at the CB client premises or observing remote auditing via electronic means.

Note: ABs may witness other activities conducted by CBs as part of their accreditation process, outside of the scope of this document.

1.2 File review

Activity performed by an AB whereby it reviews and evaluates the records and documents pertaining to a given certification file, in order to determine whether the relevant CB procedures were followed and implemented. This is normally done at the CB premises, with the appropriate CB staff and/or auditors, although it may be performed remotely or elsewhere (eg: CB client premises) as appropriate and agreed.

1.3 Scope of accreditation

Specific management system standards and their relevant parts, codes, sectors, categories or technical areas, according to which CBs grant an accredited certification in a specific location.

2 GENERAL POLICIES

2.1 Objectives

2.1.1 The objective of witnessing, in conformity with § 7.5.6 and § 7.7.3 of ISO/IEC 17011, is to provide assurance of the competence of the MS CB across the scope of accreditation. The competence requirements related to auditing and auditing personnel are specified in ISO/IEC 17021 series.

2.1.2 The witnessing of CB's audits on their clients by ABs is valuable for:

- i. verifying, on site, the effective implementation of the CB's certification programmes and procedures (and especially with regard to their assignment of competent audit teams and determination of audit time) and determine the correct assignment of scope by the CB for the client,

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- ii. observing the CB's auditors to evaluate if they:
 - a. conform with the CB's procedures;
 - b. adequately address the requirements of:
 - certification requirements;
 - applicable points of ISO/IEC 17021;
 - relevant IAF documents; and
 - any relevant sector specific requirements, as applicable.
 - iii. obtaining a representative sample of the competence of the CB across the accreditation scope.

2.1.3 This document will enable an AB to determine whether the CB has competent scheduling/planning and auditing personnel, and to assess the CB's competence to perform certification audits under accreditation.

2.1.4 Witnessing can also be initiated for other reasons, according to the AB's procedures and/or policies e.g. upon the receipt of complaints, claims, disputes, market or regulator feedback.

2.2 General policies

2.2.1 ABs shall have a policy to cover the scope for each applicant and accredited CB through the use of the various mechanisms that are available, including:

- i. office assessment activities;
- ii. witnessing activities; and
- iii. other assessment activities, as defined by the AB according to the needs identified.

2.2.2 ABs shall ensure that the requirement for witnessing by the AB is included in the contract agreements between CBs and their clients and confirm that refusal to accept a witness assessment by the AB, must be justified and accepted by the CB and the AB, and could result in withdrawal of accredited certification where reasons are not accepted.

2.3 General instructions for using witnessing to cover the scope of accreditation

2.3.1 ABs shall have an assessment programme covering the scope of each applicant or accredited CB for each accreditation cycle. The programme must be periodically reviewed and updated, as needed.

2.3.2 The programme shall consider the need to assess any cross-frontier certification activities, based on the size of the CB operations, their criticality, and feedback from the local AB. If witnessing is needed, the AB shall have a process for cooperation with the local AB, according to MLA rules and regulations.

2.3.3 When deciding how many and which audits are to be witnessed, the AB shall take into account factors such as:

- i. the CB's overall performance;
- ii. factors such as process complexity or legislation etc. which influence the ability of the certified organisation to demonstrate its ability to meet the intended outcomes of the MS;
- iii. feedback from interested parties including complaints about certified organizations;
- iv. the results of the CB's internal audits;
- v. scheme owner requirements, etc.;
- vi. changes in CB work patterns – growth of work within a specific region or technical area;
- vii. number of clients within the CB's scope of accreditation;
- viii. confidence in the CB's auditor evaluation and approval process; and
- ix. previous or other office or witnessing assessment results, etc.

The following additional factors may be taken into account to select witnessing activities:

- i. number of certificates issued;
- ii. number of auditors;
- iii. different auditors;
- iv. whether auditors are internal staff or external resource;
- v. different audits, initial audit (stage 1/stage 2), surveillance and recertification;
- vi. complex clients, combined and/or integrated audits, multi-site audits;
- vii. countries where audits in the certification process are performed;
- viii. result of previous witnessing activities;
- ix. complaints, customer surveys;
- x. interested parties and regulators requests;
- xi. the technical clusters already assessed;
- xii. experience from other types of accreditation of the CB;

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- xiii. previous history of the CB's ability to manage its operations;
 - xiv. level of controls exercised by a CB over its critical activities;
 - xv. specific scheme requirements; and
 - xvi. national agreements with clients.

2.4 General instructions for carrying out a witnessing

2.4.1 When requested, the CB shall promptly provide to the AB the complete and updated schedule of confirmed and planned audits (dates, location, audit team composition, audit type and scope, etc.), in order to allow the AB to schedule or update the program for the coverage of the scope of accreditation.

2.4.2 ABs shall have a policy to deal with refusals by a CB (including those originating from the CB client) for a given witnessing, including the imposition of sanctions on the CB when the refusal is not duly justified and accepted by the AB (e.g.: security clearance) and/or compromises the coverage of the applicant or accredited scope. If the CB client refuses the AB witnessing, in order to avoid sanctions, the CB shall withdraw the existing accredited certificate, or, if not yet certified, the CB will not be allowed to place the accreditation logo on the future certificate, unless the refusal is duly justified and accepted by the AB.

2.4.3 If sanctions are imposed on a CB resulting in certificate withdrawal then other ABs and all scheme owners who may be impacted shall be notified, if their identity is known. An accredited certificate shall not be issued if, in order to avoid having its audit witnessed, the organization transfers the certificate to another CB or if the CB intends to reissue the same certificate under the coverage of another AB.

2.4.4 Pre-witness activities shall ensure that the AB has the CB's audit plan, previous audit reports if applicable, audit team competence records and the justification for calculation of the audit time.

2.4.5 For each witnessing, the AB shall appoint an assessment team, competent in the relevant scope of accreditation. The AB shall inform the CB in advance of the AB assessment team composition. The CB and/or its client can object to the nomination of a given AB assessor on the grounds of demonstrated close or direct relationships with competitors (threats to impartiality) or a previous valid complaint against an assessor, etc..

2.4.6 It is the duty of the CB to inform its client, to explain the witnessing procedure, and to get the client's agreement. The CB is not expected to change its audit team, audit plan or audit duration due to the witnessing. If such changes do take place, the CB shall provide appropriate justification to the AB.

2.4.7 During witnessing, the AB assessors' activities shall be those of an observer, without influencing the conduct of the audit by the CB's audit team. Access to the client's documentation reviewed by the CB's audit team shall be promptly provided to the AB's assessors upon request.

2.4.8 Any information collected during the witnessing of an audit is confidential and shall be treated by the AB assessors and staff accordingly.

2.4.9 The direct questioning of the CB's client by the AB is not allowed, as this can affect the outcome of the audit. AB assessors shall not provide any opinions to the CB, while the audit is being conducted. The AB assessors shall not provide any opinions to the CB's client at any time. AB assessors should ensure that their presence and witnessing activity is not perceived as interference by the CB's client, and is instead viewed positively.

2.4.10 Normally, the full on-site audit shall be witnessed, unless objectives for a particular activity can be satisfied with a partial witnessing.

2.4.11 Feedback on the CB's performance, including any assessment findings/non-conformities, shall be given to the CB's audit team when the witnessing is completed. The feedback should include outlining the AB's reporting process, the CB response / reaction process and the AB decision-making process. Where possible this feedback should be provided to the CB's management as well. This should occur after the audit, always in the absence of the CB's client.

2.4.12 When relevant to the objective and scope of the witnessing, the AB's assessors shall get and review the CB's own audit report (and any additional information required).

2.4.13 It is the responsibility of the CB's client to inform in advance the audit team and the AB assessors, of all the applicable safety requirements. AB assessors shall conform to safety rules made known to them by the organization; however, it is expected that AB assessors shall take immediate action at any time to avoid injury, including leaving the area or the organization if necessary.

2.4.14 If at any time during the assessment of a CB audit the AB assessor observes a potential condition he or she considers to be an imminent risk of high severity (e.g. health and safety or the environment) the AB assessor shall request an immediate private meeting with the CB's audit team leader to inform him or her of the potential threat, with the expectation that the CB's audit team leader will address the threat with the organization in accordance with the CB's process and any legal obligation.

3 PROCEDURES

3.1.1 ABs shall have written procedures for ensuring that appropriate mechanisms and criteria are in place to cover and assess:

- i. the applicant scope of accreditation (initial or extension) in a representative way; and
- ii. the scope of accreditation during each accreditation cycle.

3.1.2 Those procedures shall conform with the provisions set out in this document, and detail:

- i. the approach to achieve representative sampling (quantitatively and qualitatively);
- ii. the mechanisms used to cover the scope of accreditation and the criteria for selection and use of each mechanism; and
- iii. the records to be kept.

3.1.3 The procedures for reporting a witnessing shall give evidence and provide the conclusions and judgement of the AB assessment team as to the implementation of CB process to perform the audit and the conformity and performance of the CB team, with the relevant requirements and the overall competence of the CB for the activities it performs. AB witnessing report shall include where applicable:

- i. comments on CB planning (determination of audit time, audit programme – if available - and audit plan);
- ii. audit team (competence of the team, job assignment, scope coverage and effectiveness of the audit);
- iii. auditing technique (interview, observation of processes and activities, review of documentation and records, sampling, establishment of audit trails, ability to collect, verify and record evidence of conformity and non-conformity in line with the required elements for the type of audit, appropriateness of grading of findings, handling of previous findings, reporting, opening and closing meetings and debriefs);
- iv. comments on CB findings and conclusions in relation to the client MS conformity and implementation, and significant findings not reported or identified by the CB's audit team, if applicable;
- v. others (e.g. whether impartiality was maintained, safety arrangements, confidentiality, regulatory or legal compliance, post-witnessing activities if included, conformity with the CB procedures);
- vi. AB findings and conclusions identified during the witnessed audit; and
- vii. a conclusion on the reliability of the CB's report to reflect the actual audit findings and conclusions.

3.1.4 The AB report on the witnessing should not duplicate the information already provided in the CB audit report.

3.1.5 If the AB assessor was not present throughout the CB audit, the witness report should outline which audit activities were witnessed (including identification of the parts of the audit plan and which requirements of the MS standard were witnessed by the AB).

4 SPECIFIC APPROACH FOR SAMPLING OF SCOPES

4.1 How to read the tables – explanations

4.1.1 All the IAF codes (see IAF ID1) have been merged into a series of technical clusters (taking into consideration the applicable regulations, the technicalities of the processes, and the consequent competence needed by CB's audit team) as appropriate for each type of MS certification (QMS and EMS).

4.1.2 Critical codes have been identified for each technical cluster. A critical code is a code that from a technical point requires the CB's audit team to have a higher level of:

- i. competence (due to the complexity of the processes / environmental aspects involved), or
- ii. caution (due to the risk of non-conformities and their impact, or to the high degree of regulation), or
- iii. diligence (due to the desired personal behaviours that are important for personnel involved in certification activities as required in a specific context).

4.1.3 If another coding system is used, the CB shall establish a correlation between their coding system and the coding system defined in this document.

4.2 General rules applicable to QMS and EMS schemes

4.2.1 Although ABs are allowed to have increased sampling strategies for various reasons (e.g. national agreements with clients, stakeholders or regulators), this document provides a baseline that shall be respected.

4.2.2 The assessment program shall guarantee that competence is assessed throughout the scope in the accreditation cycle, for all IAF codes of each MS scheme, with one of the mechanisms described in § 2.2.1. If this kind of assessment is not possible in the accreditation cycle, then the AB shall reduce the scope of accreditation.

4.2.3 In the initial accreditation cycle of each MS scheme (meaning from 1st surveillance to the 1st reassessment), the AB shall perform at least one witnessing activity in each technical cluster of each MS scheme. This programme will continue until the CB has demonstrated sufficient experience and performance for an enhanced programme. When this happens, the AB shall perform at least one witnessing activity in each technical cluster of each MS scheme, to be complemented with other assessment activities to guarantee that each technical cluster is assessed during two successive accreditation cycles. The AB shall be able to justify why the witnessing programme was reduced. The witnessing frequency established for the 1st cycle should be reinstated if significant changes occur in the CBs' auditor qualification process, auditing practices or results and audit personnel.

4.2.4 The following witnessing rules apply for the granting and extension of accreditation of each MS scheme to be complemented with other assessment activities to guarantee the appropriate coverage of the applicant scope:

- i. if a technical cluster has only 1 critical code, the AB shall perform a witnessing activity in this critical code to grant accreditation for all the IAF codes in that cluster - e.g. for QMS, cluster Food, with 1 witnessing activity in IAF code 03, the AB can grant accreditation in the other IAF codes (01 and 30) of that cluster; for EMS, cluster Paper, with 1 witnessing activity in IAF code 09, the AB can grant accreditation in the other IAF codes (7 and 8) of that cluster;
- ii. if a technical cluster has more than 1 critical code, the AB shall perform at least a witnessing activity:
 - a. in all the critical codes that are identified with an “and” (on the “Critical code” column);
e.g. for EMS, cluster Goods Production, with 1 witnessing activity in IAF code 04 or 05, the AB can grant accreditation in all the non-critical codes (06 and 23) of that cluster, but the other critical code (04 or 05) needs to be witnessed to be granted.
 - b. in one of the critical codes that are identified with an “or” (on the “Critical code” column);
e.g. for QMS, in cluster Mechanical, with 1 witnessing activity in IAF code 20 or 22, the AB can grant accreditation in the other IAF codes (17, 18, 19, 20 or 22) of that technical cluster;

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- iii. if it is not possible to perform a witnessing activity in the IAF code/s identified as critical, the AB can agree with the CB on one of these two options:
- a. the AB can grant accreditation only in the non-critical IAF code/s of the technical cluster for one of which a witnessing activity is performed (e.g. for QMS - Food cluster - with 1 witnessing activity in IAF code 30, the AB can grant accreditation for both IAF code 30 and 01), or
 - b. the AB can grant accreditation in all the codes of the cluster, performing an office activity in the critical code/s, but on condition:
 - o that the CB has demonstrated its competence on a documental basis in all the codes of the cluster; and
 - o that the witnessing activity in the critical code/s takes place before any certificate in the critical code/s based on accreditation is issued.

However, in such cases, if the result of the witnessing activity is negative, the AB shall consider reducing the scope of accreditation.

Note: for existing accredited CBs, if they already hold accreditation for a critical code but not the related non-critical code they can have their accreditation extended to include the non-critical codes, in line with § 4.2.8.

4.2.5 If the CB wants to be accredited only in one or more non-critical IAF codes, a minimum of one witness audit is required in each cluster with non-critical IAF codes.

4.2.6 For initial accreditation for each MS scheme, the AB shall witness both stage 1 and stage 2 audits, for at least one of the CB's clients. Prior to witnessing the stage 2 of the same audit, the applicant CB shall submit the completed report and / or conclusions from the stage 1 audit to the AB's assessment team. If the CB does not have any new clients, it is possible to witness one renewal or two surveillances which cover the key processes.

4.2.7 The possibility to grant accreditation in a whole IAF code (note: the word 'whole' reflects that some ABs use more detailed scoping inside each IAF code, partitioning it in NACE codes or IAF sub-codes) is always subject to the CB demonstrating it has the competence to manage certification in all of the underlying technical areas.

4.2.8 In addition to the above, it is necessary to assess competence also for all non-critical codes before the AB can grant accreditation. Therefore accreditation shall be granted only:

- i. in IAF codes where the CB has already taken decisions for certification (e.g. for QMS, with 1 witnessing in IAF code 03, the AB shall grant accreditation only for IAF codes 30 and 03 in cases where the CB has taken no decisions for certification in IAF code 01), or
- ii. in IAF codes where the CB has demonstrated its competence by other means (e.g. demonstrating to have competent personnel for all the specific certification functions - see Annex A of ISO/IEC 17021).

4.2.9 In cases of an integrated or combined management system audit, the scope of the witnessing activity shall be agreed with the CB. If a witnessing activity has been recently performed in the same code, for a different purpose (e.g.: ISO 13485, ISO 3834, EN 9100), the AB can consider removing the necessity of another witnessing activity.

5 QUALITY MANAGEMENT SYSTEMS (ISO 9001)

All the IAF codes (see IAF ID1) have been merged into a series of technical clusters for QMS deemed relevant for the purpose of this document.

Technical cluster	IAF code	Description of economic sector/activity, according to IAF ID1	Critical code(s)
Food	1	Agriculture, forestry and fishing	3
	3	Food products, beverages and tobacco	
	30	Hotels and restaurants	
Mechanical	17	Basic metals and fabricated metal products	22 or 20
	18	Machinery and equipment	
	19	Electrical and optical equipment	
	20	Shipbuilding	
	22	Other transport equipment	
Paper	7	Limited to "Paper products"	9
	8	Publishing companies	
	9	Printing companies	
Minerals	2	Mining and quarrying	2 or 15
	15	Non-metallic mineral products	
	16	Concrete, cement, lime, plaster, etc.	
Construction	28	Construction	28
	34	Engineering services	
Goods	4	Textiles and textile products	5 or 14

production	5	Leather and leather products	
	6	Wood and wood products	
	14	Rubber and plastic products	
	23	Manufacturing not elsewhere classified	
Chemicals	7	Limited to "Pulp and paper manufacturing"	12
	10	Manufacture of coke and refined petroleum products	
	12	Chemicals, chemical products and fibres	
Supply	25	Electricity supply	26
	26	Gas supply	
	27	Water supply	
Transport & Waste management	24	Recycling	24
	31	Transport, storage and communication	
	39	Other social services	
Services	29	Wholesale and retail trade; Repair of motor vehicles, motorcycles and personal and household goods	37 or 33
	32	Financial intermediation; real estate; renting	
	33	Information technology	
	35	Other services	
	37	Education	
	36	Public administration	
Nuclear	11	Nuclear fuel	11
Pharmaceutical	13	Pharmaceuticals	13
Aerospace	21	Aerospace	21
Health	38	Health and social work	38

Each AB can decide to designate additional or different critical codes within each technical cluster, according to national regulations, local market conditions and effective use. The technical justification for these modifications shall be recorded.

6 ENVIRONMENTAL MANAGEMENT SYSTEMS (ISO 14001)

All the IAF codes (see IAF ID1) have been merged into a series of technical clusters for EMS deemed relevant for the purpose of this document.

Technical cluster	IAF code	Description of economic sector/activity, according to IAF ID1	Critical code(s)
Agriculture, forestry and fishing	1	Agriculture, forestry and fishing	1
Food	3	Food products, beverages and tobacco	3

	30	Hotels and restaurants	
Mechanical	17	Limited to "Fabricated metal products"	20 or 21
	18	Machinery and equipment	
	19	Electrical and optical equipment	
	20	Shipbuilding	
	21	Aerospace	
	22	Other transport equipment	
Paper	7	Limited to "Paper products"	9
	8	Publishing companies	
	9	Printing companies	
Construction	28	Construction	28
	34	Engineering services	
Goods production	4	Textiles and textile products	4 and 5
	5	Leather and leather products	
	6	Wood and wood products	
	23	Manufacturing not elsewhere classified	
Chemicals	7	Limited to "Pulp and paper manufacturing"	7 and 10 and 12 and 13
	10	Manufacture of coke and refined petroleum products	
	12	Chemicals, chemical products and fibres	
	13	Pharmaceuticals	
	14	Rubber and plastic products	
	15	Non-metallic mineral products	
	16	Concrete, cement, lime, plaster, etc.	
17	Limited to "Base metals production"		
Mining and quarrying	2	Mining and quarrying	2
Supply	25	Electricity supply	25 or 26
	26	Gas supply	
	27	Water supply	
Transport & Waste management	31	Transport, storage and communication	24 and 39 (limited to NACE 37, 38.1, 38.2, 39)
	24	Recycling	
	39	Other social services	
Services	29	Wholesale and retail trade; Repair of motor vehicles, motorcycles and personal and household goods	29 or 35 or 36
	32	Financial intermediation; real estate; renting	
	33	Information technology	
	35	Other services	
	36	Public administration	

	37	Education	
Nuclear	11	Nuclear fuel	11
Health	38	Health and social work	38

Each AB can decide to designate different critical codes within each technical cluster, according to national regulations, local market conditions and effective use. The technical justification for these modifications shall be recorded.

End of IAF Mandatory Document for Witnessing Activities for the Accreditation of Management Systems Certification Bodies.

Further Information

For further Information on this document or other IAF documents, contact any member of IAF or the IAF Secretariat.

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