

IMPROVING WORLD-WIDE CREDIBILITY OF MANAGEMENT SYSTEM CERTIFICATIONS

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1. INTRODUCTION

Accreditation shall ensure that accredited certifications of management systems (quality, environment, information security, occupational health and safety, food safety, etc..) are reliable indicators of the capability of the certified organizations to consistently deliver conforming products and services or, in general, to manage their resources and processes in a way as to fulfil the applicable requirements (output focussed accreditation).

Management system certification has many criticalities.

It is an indirect form of quality assurance (quality = ability of satisfying the pertinent economical and social needs), having the related advantages (straightforwardness and generality of applicability) and disadvantages (indirect guarantee, significant residual risk of non-quality).

On the other hand, it has acquired a large diffusion and visibility (accredited ISO 9001 certifications worldwide are nowadays close to 1.000.000 and ISO 14001 certifications exceed 120.000) and has induced great expectations in the social-economical context.

Note that it will be counterproductive and, to a large extent wrong, starting to go around and saying to the instrumental customers, final users or consumers and stakeholders in general that they are expecting from accredited management system (MS) certification what these cannot give. Such a statement will disqualify, in a shot, the last 30 years of history in standardization and conformity assessment in the field and it is not true in itself.

On the contrary, it is necessary to identify the weaknesses of the various components of the “chain”, namely:

- MS standards in themselves (which can certainly be improved, although the influence of the accreditation community might be limited);
- interpretation and application of MS standards (here the main issue is the cultural maturity of the concerned organizations, although interpretative guidance from the issuing bodies might be of help);
- interpretation and application of the conformity assessment standards (here the role of the accreditation community is a central one, particularly concerning the applicative guidance documents);

- certification (to be ruled through the pertinent conformity assessment standards and guides and their proper implementation);
- accreditation (being again, principally although not necessarily exclusively, a matter of definition of appropriate rules, their factual substantiation and their effective enforcement),

and try to define and implement the required corrective measures.

In doing this, it is essential to set up a system of mutual synergic and complementary interactions among the actors involved (standardization bodies, certified organizations, certification bodies, accreditation bodies, intermediate users, final consumers and society at large).

This report is mainly dealing with the issues concerning accreditation and accredited certifications, although also other aspects are outlined, owing to the strict interdependency of the constitutive components of the above scenario.

2. THE IMPROVEMENT STRATEGY

Accreditation of MS certification bodies has been traditionally focussed on assessing the competence of the body rather than looking at the quality of the results delivered by it.

In an ideal world this should not be a problem: if the body is competent, the results should be good ones. As a matter of fact, the experience has shown that this is not necessarily the case.

First, the “competence” is a complex and, to an extent, subjective issue, owing to the large number of variables involved that are not easy to be univocally and objectively defined and measured.

Hence, the need for rules as precise and univocal as possible.

Second, the competence even if potentially existing is not necessarily always displayed in the appropriate way, due to many technical, logistic and operational reasons.

Hence the need for an appropriate surveillance which, in turn, cannot be limited to the scheduled periodic checks, but must include extraordinary surveillance based on the intelligence of the AB and on the feedback from the interested parties.

For the sake of illustration, the required improvement strategy may be divided under the following main items:

- 1) *Improvement of the accreditation rules*, to achieve better effectiveness of accreditation; these are the rules and criteria for granting and maintaining accreditation of MS certification bodies. They are based on the relevant conformity assessment standards and application guides developed by the accreditation community. Needs for improvement concern a variety of topics (see chapter 3), among which surveillance plays a distinct role.

- 2) *Enhancement of the effectiveness of the certification process*, to achieve substantial consistency and value of certifications; this objective may also be partly pursued acting on the above standards and guidance documents, but it largely depends on the cultural maturity of the CABs and is strictly related, again, to the strengthening the surveillance mechanisms.
- Also the cultural maturity (or better immaturity) of the certified organizations plays, in this context, a major role. It is nearly impossible to provide a good service to a customer who does not understand its value, for both ignorance or bad faith. The perverse cycle between “incompetent” CABs and “incompetent” organizations, if not timely and effectively removed, will soon destroy the credibility of MS certification.

It is evident that items 1) and 2) are strictly correlated and complementary.

- 3) *Harmonization of ABs behaviour*, to achieve proper consistency of accreditation; this requires that all ABs follow/enforce the rules defined as per 1) and 2) and that the relevant implementation is assured by supra-national oversight, this being, at the end, the role of the IAF MLA. There is certainly the need for exerting more rigor both in granting the IAF membership first and in granting and maintaining the MLA signatory status then, but it is to be considered that IAF – as a world wide organization – has limited capability of direct control on the operation of its members and that the action of IAF needs necessarily to be based – as it is – on the regional MLAs (EA, PAC, IAAC and others).
- 4) *Accountability towards the stakeholders/marketplace recognition*; the above three levels are already in place and operational, although with many deficiencies. A fourth level is deemed necessary for the appropriate governance of the worldwide conformity assessment infrastructure in the field of management system certification. This will not diminish the role of IAF. On the contrary, it will enable IAF, as an essentially technical organization, to perform at best its technical function with the “political” input and cooperation of the interested parties. In this regard, it could be useful establishing a kind of IAF Advisory Board composed of representatives of IAF, of the international standardization Bodies (ISO, IEC, others), of the regional co-operations gathered under the IAF umbrella and of appropriate international representations of the main stakeholders categories (Regulators, CABs, industry, consumers, etc..) with the main task to sustain and monitor the credibility of accredited MS certification and to foster the achievement and consolidation of an adequate marketplace recognition.
- According to above, the basic IAF strategy for improving the value of accredited MS certifications will have two develop along the following main directions:
- a) IAF shall endeavour to improve the technical rules for both ABs and accredited CABs. In an hopefully not too far future this function shall be undertaken by the single worldwide accreditation organization resulting from the merging of IAF and ILAC.

- b) IAF shall oversight, in an effective manner, the proper functioning of its members, both directly for non regionally affiliated members and through the regional MLAs for members signatories of the latter.
- c) IAF shall contribute to the overall governance of the system, in an accountable way, increasing the co-operation with partners and stakeholders.

3. THE OPERATIONAL ACTIONS FOR IMPROVEMENT

They are reviewed in the following with reference to the above strategic directions.

3.1 IMPROVEMENT OF ACCREDITATION AND CERTIFICATION BY REENGINEERING THE RELATED RULES AND PROCESSES

This is the field where IAF shall concentrate its major efforts. It is not the purpose of this paper to analyse in details all the numerous and complex technical aspects involved.

A few general topics are identified and discussed based on the principle of “focussing on the output”, namely on the real quality of the results provided:

- by the accredited CABs, in terms of credible assurance of the substantial effectiveness of the certified management systems.
- by the organizations owning accredited certifications of conformity, in terms of demonstrated ability of making proper use of the management system in order to deliver conforming products and services or, in general, to achieve the objectives for which the MS has been put in place.

This will imply a somewhat cultural change by some ABs and CBs and, as any change, might encounter significant resistance.

We shall anyhow leave behind us the long-lasting and unproductive discussion on “more rules” or “less rules”, on “equivalence of procedures” or “equivalence of results”. We must define the right rules and procedures, based on optimal compromise among the different requirements.

Also the too often repeated refrain of “no more no less” shall be disregarded, since it has been used in a way to prevent progress.

In this re-engineering process, best use should be made of the experience of the most advanced sector schemes (automotive, aerospace, telecommunication, etc..) which have tried (may be with only partial success) to be more output focussed than we have been so far.

3.1.1 Improving the effectiveness of accreditation

The main items of concern can be summarized as follows (as preliminary indication):

- *organization and general operation of the ABs*; these aspects are covered by the standard ISO/IEC 17011. In this regard, it is to be noted that the use of a single standard – for ABs involved in the accreditation of conformity assessment activities having not only operational but also cultural differences (there is a fundamental difference between accrediting a calibration laboratory and a multinational CB certifying all kinds of MS) – has many advantages but also significant drawbacks. In drafting guidance to ISO/IEC 17011, IAF must be aware and try to take care of this. Specific recommendations should be provided to the competent IAF/ILAC joint TF.
- *competence of ABs assessors*; this fundamental item is not sufficiently covered by the above standard. AB assessors shall be able to follow a process oriented approach and shall be knowledgeable of the technologies, products and processes pertaining to the sectors of social economical activities in which the accredited/applicant CABs issue their MS certifications. Clear requirements must be defined in this respect. They could be introduced in the IAF guidance to ISO/IEC 17011 or, better, in a separate guidance document (see the example of ILAC). The possibility should be explored of establishing a mechanism of approval by IAF of the ABs lead assessors (possibly implemented with the cooperation of regional organizations).
- *surveillance*; this is, with no doubts, the core issue for improving effectiveness of accreditation. Regular surveillance shall be enhanced with systematic review of the certification files. Extraordinary surveillance shall also be reinforced – particularly based on feedbacks from the marketplace and stakeholders in general – both at the premises of the CB and, chiefly, through witness audits allowing, not only to assess the performance of the CB, but also and principally the real status of the certified or to be certified management system. Some kind of “proficiency test” should be developed to allow to check the effectiveness of the certified MSs. Moreover, within the surveillance activities, the possibility should be given to the AB to go directly to assess the compliance, with the applicable requirements, of the certified MSs (as it is done in case of accreditation of testing laboratories), by introducing the necessary clauses in the contractual document between the AB and the CB and between the CB and the client organization. Also remote electronic surveillance allowing the AB to keep under “permanent” control the documents and files of the CB could be envisaged, as well as the obligation for the CB to submit periodic self-evaluation to the AB. Where to introduce the above requirements on enhancement of surveillance is a matter of discussion. The straightest way would be in guidance to ISO/IEC 17011 but also guidance to ISO/IEC 17021 or an ad hoc additional guidance document could be considered.

- *sanction measures*; the ABs must adopt more rigorous policies in terms of sanction measures to be applied where there is evidence accredited certifications not being effective. These may include imposing suspension or withdrawal of the certifications improperly released, as well as sanctions directly against the defective CB (intensification of surveillance in the concerned sectors, reduction or suspension of accreditation, etc..). To be really effective, the adopted sanctions should be duly publicized. Guidance to ISO/IEC 17011 could be the right place to address this issue.
- *cross-frontier accreditation/certification*; this is also an issue of concern in the context of the present analysis. Going accrediting MS certification bodies abroad (*) – in countries which may be geographically and culturally far from that of the AB – might reduce the capability of the latter of exerting proper oversight on the operation of the accredited CABs and on the quality of the results delivered by them. Also the situation of CABs having their main premises in the country in which they are accredited and certifying under this accreditation in other countries, through local branches, may be critical, if the CAB's central department does not exert a proper control on its branches and if the responsible AB is not able of reacting with the necessary effectiveness and timeliness (as might happen due to distances, different languages, difficulties of having the feedbacks from the market, etc..). These problems are being faced and solved to an extent by the application of the IAF cross frontier policy but it is a fact that a significant fraction of "poor" certifications (and chiefly QMS) falls within the above situations.

(*) the situation may be less critical as for the accreditation of product certification bodies, personnel certification bodies, inspection bodies, testing and calibration laboratories.

3.1.2 Improving the effectiveness of certification

As already mentioned, this item is strictly related to the previous one. In particular, the reinforcement of the surveillance activity by the ABs, according to above, will significantly contribute to the improvement of the effectiveness of certification. The main additional aspects to be considered include:

- *competence of CB auditors/auditor qualification*; the criteria for auditor qualification shall be deeply reconsidered with respect to the traditional practices, including reconsidering the added value of auditor certification. Real knowledge, of the technical and managerial issues concerning the business sectors where the audited organization operates, based on adequate curricula, is required. Auditing experience in such sectors may represent an useful complement but it is not a sufficient qualification criteria in itself. The capability of conducting process oriented audits shall be assured and the existence of the necessary personal attributes shall be objectively demonstrated. The entire mechanism of auditor training shall thus be re-examined introducing – in addition to the obvious requisites on knowledge of MS standards and audit procedures – clear requirements on understanding and mastering of basic concepts such as organisational learning, capability maturity model and process oriented audit. Formal requirements of little substantial value, as the duration of the training courses, years of working, num-

ber of audits, etc., shall not be any longer the (unique) basic reference for demonstration of auditor competence.

This new approach should be reflected either in an hoc IAF guidance document to ISO 19011 or, preferably, in the planned part 2 of ISO/IEC 17021.

- *effective use of auditors by the CB*; CBs shall demonstrate, on their turn, that they are capable to assure the competence of their auditors and of assigning the right auditor to the right task. This issue should be covered by IAF guidance to ISO/IEC 17021.
- *conduct of the assessments/audit times*; Concerning the audit times, the rigid numerical approach foreseen by Table of Annex 2 of IAF Guidance to ISO/IEC 62 shall be overcome. The CB shall demonstrate it has in place appropriate criteria to ensure – in all respects and circumstances – that it is able to display the manpower resources (man days) necessary for the appropriate conduct of the audit, based on risk assessment and on other applicable elements. It can be shown that this approach may lead, in some cases, to the allotment of audit times shorter than those derived from the above cited table but, in many other cases, it could require much longer times. This matter shall be dealt with in the IAF guidance to ISO/IEC 17021.
- *commercial competition among CBs*; competition is not a “bad thing” in itself and, in principle (!), it might help to improve the quality of products and services delivered to the market by the competing organizations. Unfortunately, for a number of reasons that are not recalled here for sake of brevity but are well known to all of us, this is not the case in the field of MS certification, particularly QMS. In this case, competition is highly detrimental to the quality of the services provided by CABs and may even force potentially good and competent bodies to issue poor certification (cutting audit times, using non qualified auditors, etc.) just to stay on the market.

It will be almost impossible to solve this problem 100 %, but we shall try to re-conduct it from the present nearly pathological status to a physiological one.

Remedies are already included in what specified above concerning the improvement of the accreditation rules (to prevent unreliable CABs to obtain and maintain accreditation), including the reinforcement of the sanctions measures adopted following the enhanced surveillance (concerning both the CABs and the improperly certified organizations) and their wide publication. Also an actions towards the concerned organizations (seeking cheap certification), supported by the relevant category associations – aiming at explaining that they believe to save money but at the end they are wasting their money – could be beneficial in this respect.

3.2 HARMONIZATION OF THE BEHAVIOUR OF ABs – THE ROLE OF THE IAF MLA

The members of IAF, signatory to the IAF MLA, are called to follow the defined rules by themselves, as well to enforce their implementation by the accredited CBs.

The expected degree of harmonization will depend on the level of flexibility foreseen by such rules and may be different for different aspects. Stricter compliance might be required for some crucial issues, as the effectiveness of the surveillance activity, the timeliness and efficacy of sanction measures, the assessment of the key component of the competence of the CBs and others. IAF will then have the task to ensure that its members do properly perform their function according to above. Rendering this action more effective than it has been so far is not an easy job. Possible actions are outlined in the following.

More rigor should be exerted in granting the status of an Accreditation Body member, for instance by requiring a preliminary, at least documental, demonstration of the compliance with the requirements of ISO/IEC 17011 and considering the possibility of performing preliminary audits.

Likewise, for the ABs who are not signatories of regional MLAs, more extensive evaluations should be carried out before granting the IAF MLA signatory status and more continuous controls should be conducted concerning the maintenance of the relevant conditions.

The fundamental issue, however, is to make appropriate use of the regional MLAs, relying of course on the guarantees offered by them but, at the same time, enhancing the oversight of their proper operation. The way this function is performed must be redesigned to a large extent, enlarging the extent and increasing the frequency of assessments, also by means of periodic self evaluations to be submitted by the regions to IAF. The existence of parallel accomplishments by ILAC is a serious complication factor and the practice of joint evaluations, instead of reinforcing the effectiveness of the action of IAF, does rather dilute it. This is a good reason for accelerating the process of merging between the two organizations.

Should we decide that IAF has not the capability of exerting a proper control on its members and on the regional cooperation gathered under its umbrella, according to the above principles, then it is better to forget about the IAF MLA and concentrate on the technical function of IAF, leaving to the regions the task to ensure harmonised application worldwide of the rules established by IAF. This is a matter open for discussion.

3.3 THE IAF ADVISORY BOARD

This board will be the forum where accountability towards the stakeholders could take place and marketplace recognition could be fostered. Its tasks will be to sustain and monitor the credibility of the international conformity assessment system operating under the aegis of IAF (with special reference to MS certification).

As already mentioned, the board will be composed of representatives of IAF and of the regional organizations gathered under the IAF umbrella (just a matter of changing of hat!), of the international standardization bodies and of appropriate international representations of main IAF stakeholders (Regulators, CABs, industry, consumers, etc..). Possibility of establishing relations with WTO should be explored.

It is evident that the creation of this body and the management of its successful operation are difficult tasks, but it is worth at least exploring the related feasibility. In this respect, the long lasting and positive experience of the EA Advisory Board could be of help.

Inputs to the board will have to be defined but should not be very much different from the input to the IAF governing bodies. Outputs expected from the board are the sharing of IAF strategic decisions and a systematic feedback from the stakeholders concerning all matters of relevance for the credibility of management system certification.

In addition, the board will have a direct oversight role on the certification system worldwide by organizing and supervising the conduct of direct assessments at accredited CBs and at organizations owning accredited certifications, based on the IAF rules and procedures. To this purpose, the board will make use of a panel of experts properly selected. The assessment team will comprise representatives of the local AB. Results will be provided to IAF for the necessary follow up, including the adoption of appropriate measures if required. Identified inadequate situations will be made transparent to the public.

The board should be established within IAF and be organisationally managed by the IAF Secretariat.

It is understood that a certain number of bodies are already in place whose duties are partly covering the functions foreseen for the board under reference but it is deemed that concentration in a single organ could be beneficial for enhancing the capabilities of governance and oversight of the system.