

Recommendations made by the ACCREDIA Steering and Guarantee Committee (CIG) regarding the definition of harmonized criteria for the verification of some requirements of the standard ISO/IEC 17021-1/15, during the assessments and surveillance visits at accredited certification bodies

Approved by the Steering and Guarantee Committee of December 3, 2019 – date of entry into force: June 1, 2020

The paragraphs below, taken from ISO/IEC 17021-1; 2015, outline the main definitions related to the recommendations made by the ACCREDIA Steering and Guarantee Committee.

Note: although some elements given in the table below are already clearly standardized in UNI CEI EN ISO 17021-1:15, they are stated here with special regard for the question of impartiality.

The requirements of the standard, together with the notes taken from the standard, are referred principally to the issue of conflicts of interests concerning accredited bodies.

Below there are some definitions and paragraphs from UNI CEI EN ISO 17021-1:2015 referring specifically to issues dealt with in the document.

3.2 Impartiality: Presence of objectivity.	<p>Note 1: objectivity means that there are no conflicts of interests, or that any such conflicts have been resolved and do not impact negatively on the activities of the CB.</p> <p>Note 2: other terms used to express the concept of impartiality are "independence", "absence of conflicts of interests", "absence of prejudices", "neutrality", "honesty", "open-mindedness", "equity", "detachment" and "balance".</p>
3.3 Consultancy activities related to the management system: participation in the definition, implementation and maintenance of a MS.	<p>Example 1: Drawing up manuals or procedures.</p> <p>Example 2: Providing specific advice, instructions or solutions for the development and implementation of a MS.</p> <p>Note 1: organizing training courses (*) and participate as trainer is not considered consultancy provided that such courses deal with MS or audit activities, providing information of a general nature; the trainer should not offer specific solutions to the client.</p> <p>Note 2: providing general information, but not specific solutions to the client concerning the improvement of processes or systems, is not considered consultancy. Such information may include as follows:</p> <ul style="list-style-type: none"> • explain the meaning and aims of certification criteria; • identify improvement opportunities; • explain theories, methodologies, techniques and related instruments; • share non-confidential information concerning best practices; • other management items which are not covered by the audited MS. <p>The term "training" is used in a broad sense of training and professional development.</p>
4.8 Risk based approach	<p>CBs need to take into consideration the risks associated with the act of providing competent, coherent and impartial certification. Risks include (amongst others) as follows:</p>

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| | <ul style="list-style-type: none"> • the objectives of the audit; • sampling used in the audit process; • real and perceived impartiality; • issues regarding legal and mandatory responsibilities; • the organization of the audited client and its operative environment; • the effect of the audit on the client and its activities; • the health and safety of the audit teams; • the perception of the interested parties; • misleading statements by the certified client; • the use of symbols/marks. |
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The table below contains 6 columns:

- the first gives the progressive number;
- the second shows the reference paragraph of ISO 17021-1 ed. 2015;
- the third shows the typology of conflict of interests (macro category);
- the fourth gives examples expressed by the Committee;
- the fifth shows the modalities of investigation which may be used for verifying the conflict;
- the last one presents a brief summary of the acceptability or otherwise of the situation/activity, concerning conflict of interests.

This table can be used to create a risk analysis document or as a checklist for performing internal or external assessments.

N°	Requirement of the standard ISO/IEC 17021 (point)	Typology of conflict	Example of situation/activity in conflict	Method of investigation	Acceptability
1.	5.2.5: A certification body or any other part of the same legal entity or any other part under the organizational control of the certification body, shall not offer or provide consultancy activities relating to the management system,	Risk: own interest, self-assessment	A CB which issues certification against a certification standard provides consultancy on other certification standards, maybe in a peer context, for which it is not accredited.	Market analysis	A CB shall not offer consultancy on management systems, also in areas for which it is not accredited. See the Resolutions of the EA CC Committee of October 3, 2019. ¹
2.	4.2.2: it is well known that the source of income of a CB is its clients who pay for certification and who constitute a potential threat to impartiality	A CB with a small number of clients gains revenue from the maintenance of every client.	A CB which operates for a single client or only for a more important client	Intensification of surveillance activities. Economic assessments of the balance sheets and CERVED document review (activity already normally undertaken)	Acceptable as long as it is managed within the CB's risk analysis.
3.	4.2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: own interest, self-assessment	Provision of a competent, qualified and authorized medical officer The CB provides its own staff which takes on the role of a Surveillance Body in accordance with Law Decree 231/01 or as DPO (Reg. EU 2016/679) <i>In general, the ACCREDIA assessors can analyze data regarding the balance sheet and the additional note, also the active and passive invoices of the CB, but they cannot perform audits of an administrative or fiscal nature in such a way as to influence the contents of the balance sheet.</i>	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed) <i>In practice it is almost impossible to obtain data of this nature from a review of the account documents made available by CBs. See note alongside here. It is possible to intervene in cases of other evidences (e.g. published on the website).</i>	Unacceptable threat for organizations certified by the same CB within two years of the last activity performed on the organization to be certified.

¹ *Question:* A CB accredited according ISO/IEC 17021-1 for ISO 9001 and ISO 14001, but is not accredited for ISO 45001. This CB is offering non-accredited ISO 45001 certification. This CB is offering ISO 45001 consultancy to one QSE (ISO 9001-14001-45001) certified client: is it acceptable? If the client was certified only to ISO9001 and ISO 14001, would this be acceptable? *Answer:* The answer to both questions is NO. The requirement has been written with the intent that a CB shall not offer or provide MS consultancy irrespective that the CB is accredited or not.

4.	4.2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: own interest, self-assessment	Provision of competent medical service, qualified expert, authorized medical doctor. The CB provides its own staff who take on the role of Surveillance Body in compliance with D. Lgs 231/01 or as DPO (Reg. EU 2016/679) <i>In general, the ACCREDIA assessors can analyze data regarding the balance sheet and the additional note, also the active and passive invoices of the CB, but they cannot perform audits of an administrative or fiscal nature in such a way as to analyze the details of the balance sheet.</i>	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed) <i>In practice it is almost impossible to obtain data of this nature from a review of the account documents made available by CBs. See note alongside here. It is possible to intervene in cases of other evidences (e.g. published on the website).</i>	Unacceptable threat for organizations certified by the same CB within two years of the last activity performed on the organization to be certified.
5.	4.2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: own interest, self-assessment	The CB provides an audit service upon request by the Surveillance Body in accordance with Law Decree 231/01.	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Acceptable threat as long as the CB, directly or with its staff, is not a member of the Surveillance Body which commissioned the audits.
6.	4.2 - 4.8 - 5.2.5	I Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: own interest, self-assessment	The performance of any form of consultancy on a company MS.	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Threat deemed unacceptable by the standard.
7.	4.2 - 4.8 - 5.2.6	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: self-assessment	Certify the MS of organizations where the CB has performed internal audits. (requirement of the standard)	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Unacceptable threat for an organization certified by the same CB within 2 years of the performance of the last internal audit at the organization to be certified.

8.	4-2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: familiarity	The performance of conformity assessment activities (accredited or non-accredited)	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Acceptable
9.	4-2 - 4.8 - 5.2.5	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing. Risk: self-assessment	Carrying out second or third party audits with reference to other standards not included in the scope of accreditation. Carrying out investigation activities which do not propose specific solutions but only a gap analysis (e.g. legal compliance audit, penetration test, Intrusion detection, related work stress analysis HACCP) Diagnostic tests of a technical nature (e.g. noise or lighting, ergonomics etc.)	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis. (see § 4.8)
10.	4.2 - 4.8 - 5.2.6	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing.	Carrying out second party audits on suppliers of the certified organization.	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis. (see § 4.8)

11.	4.2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing.	E.g.: Preparation of the risk analysis document (e.g. with regard to the security/safety standard or environmental crimes against D L 231...) Activity for attainment, renewal or modification of the Integrated Environmental Authorization, preparation and availability of the files for the renewal of the fire prevention certificate, preparation of an LCA report with results obtained and interpretation thereof.	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	A CB can offer the service but not to certified or applicant companies (in the subsequent 2 years) in the area of interest of the service offered. E.g. ISO 45001, ISO 14001.
12.	4.2 - 4.8 - 5.2.3	Engagements accepted by the CB for other services which are not related to certification or evaluation/auditing.	Energy diagnosis EGE and ESCO Energy auditor.	Verification of the revenue of the CB from the balance sheet and additional notes. (activity already routinely performed)	A CB can offer the service but not to certified or applicant companies (in the subsequent 2 years) ISO 14001 and ISO 50001 by the same CB See the IAF Decision for diagnoses ² .

² IAF Resolution (Frankfurt, Germany – Saturday/Sunday 11th-12th April 2015). *Consensus of the IAF TC: Decision Log: 15/04/01 The IAF TC could not reach consensus regarding whether an energy audit in accordance with ISO 50002 is management system consultancy. The performance of energy audits - in accordance with ISO 50002, as well as environment and energy management system certification for the same client is considered to be an unacceptable threat to impartiality.*

13.	4.2 - 4.8 - 5.2	<p>Ownership, governance, management</p> <p>Risk: self-audit, own interests</p>	<p>The CB – or its partners – has shares or stakes in a MS consultancy company.</p> <p>5.2.7 <i>Where a client has received management systems consultancy from a body that has a relationship with a certification body, this is a significant threat to impartiality.</i></p> <p>The relationship between a CB and a consultancy company constitutes a significant threat when such consultancy occurs with regard to a client of the CB.</p> <p>Apart from MS consultancy activities, also to be considered are the limits provided for by “engagements carried out by the CB for other services which are not certification or assessment activities”, as set out elsewhere in this document.</p>	<p>Verification of the revenue of the CB to discover any participations.</p> <p>Review of the Chamber of Commerce business profile or by means of the CERVED file of participations. (activity already routinely performed)</p> <p>ACCREDIA regularly assesses the business profile regarding the CB’s properties, with particular regard to its operative personnel and, in compliance with RG-01, does not start the accreditation process until there are situations of property.</p>	<p>For the CB or any other part of the same legal entity or any other organization belonging to the CB or under the organizational control of the certification body (see requirements 5.2.5 and 9.5.1.2 b) of ISO 17021:2015) – unacceptable threat.</p> <p>The standard permits, however, that between bodies with which the CB has a relationship, there can be parties which can perform consultancy activities considering and in accordance with the risk analysis. It is not permitted that there is a direct influence undertaken by the CB.</p> <p>If the CB is part of a larger group (e.g. company, consortium, corporative network) and in this group there is a consultancy company, the risk is acceptable if considered in the risk analysis. If a CB’s clients coincide with those of the consultant, the CB may certify the client if two years have passed between the consultancy activities and the certification or as envisaged by the IAF Decision of 24-25 Oct 2010 – Shanghai which includes an alternative method to the im-</p>
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14.	4.2 - 4.8 - 5.2	Ownership, governance, management Risk: own interests, self-audit, familiarity	The CB has shares or stakes (also acquired through the equity market) in companies certified by the same CB. <i>Verifications done by means of review of the business profile, but effectiveness is low.</i>	In the CB's balance sheet the participations can be inferred. Review of business profile. (activity already routinely performed)	Unacceptable threat. Possession of stock/shares bought on the stock market is acceptable only if such investments are minor and insignificant.
15.	4.2 - 4.8 - 5.2	Ownership, governance, management Risk: self-audit, own interests	Members (physical persons) of the CB possess: - stock or company engagements in consultancy companies; - stock or company engagements in certified organizations.	Review of business profile. (activity already routinely performed)	Unacceptable threat. To be assessed in the CB's risk analysis Note: Possession of stock/shares bought on the stock market is acceptable only if such investments are minor and insignificant.
16.	4.2 - 4.8 - 5.2	Ownership, governance, management Risk: self-audit, own interests	The partners (juridical persons) of the CB are consultancy companies of management systems, or they are certified companies certified by the same CB.	Review of business profile. (activity already routinely performed)	Unacceptable threat, except in cases of a public entity or large client if the owner shares are not significant. To be managed in the risk analysis
17.	4.2 - 4.8 - 5.2	Ownership, governance, management Risk: own interests, self-audit	CB and SOA have the same ownership. ³	Review of business profile. (activity already routinely performed)	The Constitutional Court did not admit the case (see the sentence reported in the note). However the issue is affected by legal modifications. The matter will be dealt with in future legal dispositions.

³ The Constitutional Court (C. cost., 20 may, n. 94) Clarified that the principle of exclusivity of the object of the SOA, with the corollary of prohibition of the performance of certification and attestation activities, is a material principle which, for combating tax evasion, prohibits any negotiation or any other method of reaching the objective, banned by the law, of contemporary per-

18.	4.2 - 4.8 - 5.2	Ownership, governance, management	The members of the CB are associations of trade categories	Review of business profile. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis.
19.	4.2.1/5.2.3	Shared human resources Risk: own interests, self-audit, intimidation.	The CB shares location or branch locations with MS consultancy companies.	Verification during the ACCREDIA assessment at the CB's head office and branch offices. (activity already routinely performed)	Possible, if the CB's clients are not the same as those of the consultancy company (if the consultancy regards certified activities). Possible (also if the clients are not the same) if, at the same location, there is no staff belonging to the MS consultancy company (secretarial, general services or administration staff are therefore acceptable). Business centers / co-working are evaluated case by case.
20.	4.2.1/5.2.3	Shared human resources Risk: own interests, self-audit, intimidation.	The CB shares operative premises with consultancy operators of another type (e.g. accountants, law firms, SOA).	Verification during the ACCREDIA assessment at the CB's head office and branch offices. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis.
21.	5.2.9	Shared human resources Risk: own interests, self-audit,	The CB takes part in conventions, meetings jointly promoted by the the CB and consultancy companies.	Verification of the revenue of the CB from the balance sheet and additional note to investigate the type of revenue, monitoring of the market. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis.

formance of certification and attestation activities by the same party. The prohibition is not applicable only in cases of the same legal person performing contemporarily certification and attestation activities, and if the certification body which participates in the SOA, but it is applicable also if there are two formally distinct companies – one performing attestations and the other performing certifications, possessing the same company team, with participation and control of the same persons.

22.	5.2.9	Shared human resources	The CB is present (as guest or simple intervention) during services performed by consultants (e.g. trainings, conventions, meetings promoted by consultancy companies).	Monitoring of the market	Acceptable, provided it is managed in the CB's risk analysis.
23.	5.2.12	Personnel Risk: own interests, self-audit	The CB's staff who perform the audit or decide on the granting of the certificate possess stock in the certified or applicant companies or have company engagements. <i>It would be extremely hard work to do a business profile for all the auditors of accredited CBs and, above all, not very effective given the facility with which it is possible to transfer stock to other persons, thereby avoiding controls.</i>	Business profile review and the signed commitments regarding the absence of specific conflicts of interests. (activity already routinely performed)	Not acceptable Note: The possession of shares bought in the stock market is acceptable only if they are not significant investments.
24.	5.2.12	Personnel Risk: own interests, self-audit, familiarity and intimidation.	The CB's staff (dependent) performing the audit or decision on the granting of the certificate, has engagements of another type (project contracts, dependent employment, occasional work efforts) by certified/applicant companies by the same CB.	Examination of the work commitments signed concerning the absence of specific conflicts of interests. (activity already routinely performed)	Not acceptable for the CB's dependent staff.
25.	5.2.10	Personnel Risk: own interests, self-audit, familiarity	The CB's personnel performing the audit or taking the decision for the issue of the certificate, if such personnel is a freelance consultant, has received engagements from the certified and/or applicant company.	Examination of the invoices and work engagements signed regarding the absence of specific conflicts of interests. (activity already routinely performed)	Not acceptable for companies directly followed by audits or decision unless at least 2 years have passed since the last engagement. Acceptable in other cases, provided it is managed in the CB's risk analysis

26.	5.2.8	Personnel Risk: own interest, self-assessment, familiarity.	The CB entrusts assignment for auditing activities and certificate decisions to a consultancy company.	Verification of the auditing assignments and of decision taken during assessment at CB's location (activity normally performed).	<p>Not acceptable for an auditing company to perform consultancy.</p> <p>Acceptable if a freelance auditor who could also perform consultancy has established a company for reasons of organization or for tax purposes.</p> <p>Acceptable if a CB has a contract with a consultancy company for collaborating with one or more employees of the company for audit activities (with tasking of the auditor by the CB), if such activities are provided for in the risk analysis (see ISO clarification request on ISO_IEC 17021-1 clause 5.2.8- August20194)</p> <p>In Italy it is prohibited to make available to third party companies a work activity without a real organization of such services</p>
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⁴ ISO clarification request on ISO_IEC 17021-1 clause 5.2.8 - August 2019

Question: Does the standard allow a CB to have a contract with an organization which provides consultancy services, if this contract doesn't constitute any outsourced activity but is limited to the use of specific employees of that organization as external auditors for the CB (with formal assignment of each audit by the CB to the auditor, impartiality declaration signed by the auditor, etc.)?

Answer: YES, as long as the risk evaluation provides for adequate mitigation of any related threats to impartiality and confirms the absence of any conflict of interest

27.	5.2.11	Personnel Risk: familiarity	The CB shall give audit engagements always to the same assessment group.	Verification during the assessment of the CB of the turnover rate of the engagement for the same client. (activity already routinely performed)	The same audit team should not do more than 3 successive audits at the same organization. If it is not possible to change the audit team, try to strengthen the control activities performed by the CB (e.g. on-site monitoring, use of observers, other assessors in the team)
28.	4.2.2 – 5.2.3 5.3.2	Financial resources Risk: own interests, intimidation	The CB is financed by a certified or a consultancy company	Verification of the balance sheet and additional note of matters related to the CB's debts (covering of losses) (activity already routinely performed)	Not acceptable except in special cases of public entities (e.g. certification of a regional structure with financing from the same regional authority).
29.	4.2.2 - 5.2.3/5.3.2	Financial resources Risk: own interests, intimidation	A sizeable proportion of the CB's revenue can be traced to organizations related to the same consultancy company. <i>OK – but it's too easy to avoid controls.</i>	Verification of the applications for certification regarding the consultancy used by the organizations. (activity already routinely performed)	Acceptable, provided it is managed in the CB's risk analysis with the approval of the CB's impartiality committee.
30.	5.2.9	Contracts, marketing, sales commissions, incentives	The consultancy service is publicized jointly with the certification service (or vice-versa). <i>See above – ACCREDIA has intervened in all cases of this type of which it has had evidence.</i>	Monitoring of the market and of the websites (activity already routinely performed)	Not acceptable

31.	5.2.9	<p>Contracts, marketing, sales commissions, incentives</p> <p>Risk: own interests, intimidation</p>	<p>Recognition of payments to consultants/consultancy companies for bringing it to the attention of the certified or applicant organization.</p>	<p>Analysis of the cost of the CB and additional note. (activity already routinely performed)</p>	<p>In consideration of the IAF Resolution of Oct. 24-25. 2010, this situation is now acceptable under the conditions of the IAF Resolution⁵.</p> <p>⁶ CBs shall make available the lists and the data during the audit at their location.</p>
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IAF Resolution of 24-25 Oct., 2010 - Shanghai. The IAF working group has agreed that there can exist an alternative method to the impossibility of certifying a company for 2 years, in cases where there has been payment (for the purchase of the certification contract) between the CB and the company/person who performed consultancy activities.

The CB shall demonstrate compliance with the following points:

- ✓ *Transparency – all the documents related to this relationship shall be kept and made available upon request by the AB. The client and the CAB’s personnel are aware of its relationship and/or payment of commission/finder’s fee and that the CAB does not provide special treatment.*
- ✓ *Management of the CAB has signed the relevant declaration of impartiality that includes reference to such relationships and their management.*
- ✓ *Risk assessment conducted for the specific relationship between the involved parties. Special attention given to the threats arising from relationships of the parties/individuals involved.*
- ✓ *Impartiality committee reviews the effectiveness of management of risk due to such relationships.*
- ✓ *A process is established to ensure there is no special treatment of clients during the certification process.*
- ✓ *Instances of pressure or influence from management, consultant or client are reported and mitigated.*
- ✓ *Additional witnessing of the audits may need to be conducted by the CAB.*
- ✓ *Closer scrutiny of audit output and certification / recertification decisions.*
- ✓ *Monitoring of such relationships through internal audit.*

An AB may need additional time to assess the management of such relationships and may also need to conduct additional witness audits⁵

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32.	5.2.9	Contracts, marketing, sales commissions, incentives Risk: own interests, intimidation	Invoices to the client sent directly by the consultancy company and not by the CB.	Analysis of the cost of the CB and additional note. (activity already routinely performed)	The same principle is applied of payment of commissions (IAF Resolution, 24-25 Oct., 2010) if the agency also performs consultancy activities. CBs shall make available the lists and the data during the audit at their location.
33.	5.2.9	Contracts, marketing, sales commissions, incentives Risk: own interests, intimidation	Invoice sent to the client directly by an agency operating in the name and on behalf of a CB	Analysis of the cost of the CB and additional note. (activity already routinely performed)	The same principle is applied of payment of commissions (IAF Resolution, 24-25 Oct., 2010) The agency also performs consultancy activities. CBs shall make available the lists and the data during the audit at their location.
34.	5.2.9	Contracts, marketing, sales commissions, incentives Risk: discriminatory behavior between different certified clients.	Price discounts or rises agreed for certain organizations.	--	Acceptable, ACCREDIA does not enter into the commercial policy of CBs (Resolution of the EA ⁷ CC)

⁷ CC Interpretation of ISO/IEC 17065, 4.4, Discrimination (The fees charged by a certification body are a purely commercial decision for the certification body and it is perfectly acceptable for a CB to charge different clients different fees, providing the certification process is applied equally to all clients. Certification bodies operate in a competitive environment. Most clients obtain multiple quotations for certification and cost will be one of the factors taken into account. Certification bodies need the flexibility to vary their fees in order to attract clients. There is no requirement in ISO/IEC 17065 for the CB to justify the reasons for the fees it charges or for applying a discount).

35.	5.2.3	Contracts, marketing, sales commissions, incentives Risk: see above	Promotional activities (e.g. free or reduced cost training courses) agreed for certain organizations.	Acceptable, ACCREDIA does not enter into the commercial policy of CBs (Resolution of the EA ⁸ CC).
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⁸ CC Interpretation of ISO/IEC 17065, 4.4, Discrimination (The fees charged by a certification body are a purely commercial decision for the certification body and it is perfectly acceptable for a CB to charge different clients different fees, providing the certification process is applied equally to all clients. Certification bodies operate in a competitive environment. Most clients obtain multiple quotations for certification and cost will be one of the factors taken into account. Certification bodies need the flexibility to vary their fees in order to attract clients. There is no requirement in ISO/IEC 17065 for the CB to justify the reasons for the fees it charges or for applying a discount).

36.	3.3 Notes 1 & 2	Training Risk: activity assimilated to consultancy	Deliver training courses at the CB or the client organization. Delivery of safety courses in accordance with legal requirements.	Analysis of training courses held by the CB and comparison with verification activities. (activity already routinely performed)	It is possible to deliver training courses (custom designed or other) only if this activity can in no way be associated with consultancy activities. The training can be conducted for persons traceable to various legal persons as well as for single persons. In the latter case, irrespective of the location of the training (at the certified company, at the CB's location or elsewhere), the CB shall fully analyze the risks of excessive familiarity. It is always possible to make interventions of simple interpretation / divulgation of the standard as long as they are general and of limited duration. If the instructor is also the auditor, the CB shall ensure greater control in order to limit the risks of familiarity.
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