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# **EA Requirements for the Accreditation of Flexible Scopes**

## ***PURPOSE***

The purpose of this document is to establish overall requirements within EA to enable an accredited CAB to assume responsibility for the management of all or part of its scope of accreditation without the necessity of a preliminary evaluation by the NAB for each new activity.

EA may supplement these requirements with specific requirements relevant to the particular sector being considered. Where additional requirements are considered necessary, these will be published as separate supplements to this document.

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## **1 INTRODUCTION**

- 1.1** Accreditation is the third party attestation related to a conformity assessment body (CAB) conveying formal demonstration of its competence to carry out specific conformity assessment tasks (ISO/IEC 17000:2004).
- 1.2** It follows that a description of the competence of a CAB must be clearly visible to prospective customers, other interested parties, and the marketplace in general. This is currently done through the scope of accreditation. It is important to define the scopes in such a way that it is possible to establish accurately and unambiguously the range of activities covered by a body's accreditation.
- 1.3** Historically, accreditation has been based on so called fixed scopes of accreditation, published by the national accreditation body (NAB). This system for defining the scope permits on one hand, an accurate description of the accredited activities of the CAB and on the other ensures that an appropriate evaluation of its competence is carried out each time an additional activity is added to the scope.
- 1.4** However, this method of describing a scope can be considered as restrictive by some CABs for the following reasons:
- There is a difference between listing specific activities that an organisation is competent to carry out, and defining its competence to apply its knowledge, skills, and experience to different activities. It is important not to let the limitations of describing the scope determine what is accredited, instead of determining what an organisation is competent to do and then describing that.
  - The fixed scope does not readily enable additional or modified activities to be added to a body's scope without further assessment, even where competence in this general area has already been demonstrated. Although existing CABs may apply for an extension to scope at any time throughout the assessment cycle, the timescales involved may prevent tenders or contracts being met within their customer's timeframe.
  - In practice, end-users are not always experienced in the conformity assessment standards. They are often faced with significant difficulties to understand the content of very long, detailed and technical scopes of activities. A more generic approach might help to promote the use of the scope of accreditation by the end-users.
- 1.5** NABs therefore need to establish mechanisms that permit, in defined circumstances, CABs to include additional activities in their scope of accreditation on the basis that their competence has been evaluated not only to carry out activities in accordance with previously evaluated procedures, but also for the development and validation of their procedures in accordance with a pre-established system. This kind of scope is called "flexible scope".

## **2 TERMINOLOGY**

- 2.1** ISO/IEC 17011:2017 defines a scope of accreditation as specific conformity assessment activities for which accreditation is sought or has been granted.
- 2.2** ISO/IEC 17011:2017 defines a flexible scope as an expression “to allow conformity assessment bodies to make changes in methodology and other parameters which fall within the competence of the conformity assessment body as confirmed by the accreditation body”
- 2.3** The term “flexible scope” is not restricted solely to scopes that are flexible in their entirety. It is also relevant to scopes that include a combination of fixed and flexible activities, or even for primarily fixed scopes that, for example include one or two flexible elements. In some cases, it may be best to define the scope by defined activities; in other cases, it may be better to use the techniques applied and the (technical) field covered by the body. Sometimes different ways may be combined.
- 2.4** The term “fixed scope” means a clearly defined description of the specific conformity assessment activities for which the body holds accreditations.

## **3 PURPOSE**

- 3.1** The purpose of this document is to establish overall requirements within EA to enable an accredited CAB to assume responsibility for the management of all or part of its scope of accreditation without the necessity of a preliminary evaluation by the NAB for each new activity. In doing so, it will enable the description of the competence of a CAB to be clearly visible to prospective customers, other interested parties, and the marketplace in general, and not only serve the needs of NABs and CABs, but also end-users of accredited services.
- 3.2** EA may supplement these requirements on the recommendation of its technical committees with specific requirements relevant to the particular sector being considered. Where specific requirements are considered necessary, these will be published as separate supplements to this document.
- 3.3** The following requirements are mandatory for EA members who offer “flexible scopes” accreditation.

## **4 CONSTRAINTS**

- 4.1** Throughout the following, it should be noted that it is not mandatory for EA members to accredit flexible scopes, although EA encourages EA members to provide this as a service to their customers. However, all EA Members are required to recognise as being equally reliable the certificates and/or reports from organisations accredited with a flexible scope in accordance with this document, as those with traditional fixed scopes. The following requirements only apply where the EA member chooses to provide the service to customers.

- 4.2** NABs shall retain the right to decide how to define the scope and whether or not to grant a flexible scope to a particular CAB.
- 4.3** NABs shall not allow the principle of flexibility to enable a CAB to move, under accreditation, into a new field of accreditation covered by a different accreditation standard or outside the defined boundaries of the flexible scope without going through the assessment process as per any fixed scope assessment by the NAB.

## **5 GENERAL POINTS FOR CONSIDERATION**

- 5.1** The differing needs of CABs means that there is no single way of implementing flexible scopes. Instead, it is the responsibility of each CAB to determine exactly what its requirements are, how it can approach this within the framework of the standard used for accreditation, and how it can demonstrate to its NAB that this approach is fit for its intended use and capable of being maintained within control.
- 5.2** The technical capability for a CAB to manage itself within a flexible scope becomes the key to introducing flexible scopes. A flexible scope can only be awarded when the CAB has demonstrated it has a design/development process that it can apply for any additional conformity assessment or to expand into additional areas covered by the flexible scope, but not previously undertaken.
- 5.3** A design process will need to determine the input requirements, develop the conformity assessment service, validate that the activities meet the requirements, and verify it against the requirements.
- 5.4** Without a demonstrated design process it would not be possible to extend flexibility beyond the current fixed scope position.
- 5.5** Accreditation of a flexible scope places more of the responsibility onto the CAB itself for demonstrating that the way that it operates is valid, fit-for-purpose, and is undertaken impartially, competently and consistently.
- 5.6** A flexible scope is a reflection of the competence of the CAB, not just technically to carry out activities covered under the accreditation, but also its ability to manage the process of having a flexible scope and its commitment to offer accredited activities within this scope.
- 5.7** CABs shall explain to (potential) customers the boundaries of their accredited scope.
- 5.8** An NAB or CAB shall not imply in any communication that holding a flexible scope is an overt sign that it is more competent than a CAB holding a fixed scope.

## **6 REQUIREMENTS**

### **6.1 Requirements for CABs**

- 6.1.1** The CAB shall have a documented design and implementation process which needs to ensure the following:
- How it determines the input requirements

- How it develops the conformity assessment activity
  - How it will validate that it meets the requirements
  - How it verifies that it has met the requirements
  - The responsibilities for the management of the flexible scope and for each set of activities
  - The contract review process confirms and informs the customer/enquirer that a request is within the boundaries of its flexible scope
  - Information on what is covered by accreditation is transparent and accurate (see 6.1.2 – 6.1.3)
- 6.1.2 CABs shall maintain a List of accredited activities conducted under their flexible scope. This List should contain information as a minimum to that detailed in section 7.8.3 a-h of ISO/IEC 17011:2017, but the NAB may further define the detail.
- 6.1.3 The purpose of the List is to provide up-to-date transparency of the application of the flexible scope and shall be made publicly available.
- 6.1.4 The CABs contract review procedure shall detail how it processes a request which is within the boundaries of its flexible scope, but where the activity has not been undertaken before (i.e. not on the List). In such cases the CAB needs to ensure the following:
- It informs the customer that it will not be able to issue a report/certificate under accreditation until the activities have been established and authorised within its system under its flexible scope process
  - It informs the customer of the appropriate implications (e.g. turnaround time, price, etc)
  - It has access to all necessary resources and other means required for the completion of the specific requested activity
  - It has suitably qualified personnel for the completion of the specific activity and its validation or verification.
  - The necessary validation or verification has been carried out
  - Updating of the List is made only after appropriate technical activities have been properly performed as per the design and implementation process and duly authorised by the CAB
  - All premises of the CAB involved in the additional conformity assessment activity have been previously declared to the NAB. Moreover, an additional conformity assessment activity shall not be included in the List if it involves new premises of the CAB that have not been previously assessed by the NAB.
- 6.1.5 Should the validation process of an activity result in the conclusion that the CAB is not capable of issuing valid reports/certificates, the CAB must ensure that an analysis of the cause is carried out and that adequate corrective action is taken. Such actions will include:
- To inform its customer that while the analysis and any consequent actions are being progressed, the CAB will not be able to issue accredited reports/certificates and the reasons for this
  - The revision of the relevant procedures or methods should the reason be specific technical problems for this particular activity, in order to resolve the problem identified and to ensure it does not happen again in the future
  - Redefinition of the boundaries within which the scope is flexible. In this case, the CAB shall inform the NAB in order to review whether the way that the accreditation scope is described must be modified

## 6.2 Requirements for NABs

- 6.2.1 A NAB shall have a flexible scope policy on whether it will accredit flexible scopes (as per 4.1)
- 6.2.2 If the NAB policy is to accredit flexible scope it shall consider applications for flexible scope based on the level of risks associated with the activity.
- 6.2.3 In determining the level of risks associated with the activities and applicability for a CAB to have flexible scope, the NAB shall consider the following aspects during the accreditation process:
- Degree of understanding of the CAB in the rules and procedures for implementing and managing a flexible scope
  - Performance and stability of the CAB's management system
  - Complexity of the conformity activities
  - Extent of flexibility given to CAB
  - Reputational risks for NAB, CAB and market
  - Stability of technical personnel within CAB, responsible for the activities relating to flexible scope
  - Knowledge of the CAB and its compliance to the relevant standards and activities
  - Stakeholder/regulatory expectations
  - The planned frequency of use of the flexible scope
  - Extent of controls proposed by the CAB for managing a flexible scope
  - Location and geographical risks
- 6.2.4 NABs shall establish procedures to regulate their assessment and accreditation of flexible scopes where they provide such a service to CABs. These should include controls for managing these accreditations, including what records are needed, how they will plan assessments depending upon risk, complexity and changeability of the scope, how the CABs will update the NAB on changes or additional work, what changes will be required in assessment reports to be able to justify decisions made to grant flexible scopes etc.
- 6.2.5 NABs shall verify that CABs are competent to manage a flexible scope and compliant with the requirements of section 6.1. The verification process should include the examination of real examples where a CAB has implemented a flexible scope. In the assessment programme for the CAB, the NAB should take a risk-based approach and justify its approach and ongoing effort for each CAB. This risk based approach should take into account factors detailed in 6.2.3 to determine the appropriate level of sampling to confirm ongoing controls and effective implementation are in place in areas such as:
- All additional/modified activities
  - Validation
  - Metrology assessment (where applicable) / Quality assurance mechanisms
  - Competence and training of personnel involved with the additional activity
  - Availability of working instructions, legal requirements, Directives etc
  - Comparisons with other activities



- Risk assessment

6.2.6 The scope of accreditation issued by the NAB shall make reference to the List.

6.2.7 Should the CAB have issued any reports/certificates under accreditation that do not comply with the requirements of this document, the NAB shall take the measures it deems appropriate.

6.2.8 In the same way, depending upon the nature, implications and severity of the possible non-conformity identified in terms of the management of a flexible scope, and without prejudice to other actions (for example, suspension of accreditation), the NAB may decide to revise the scope such as to reduce or even withdraw the flexibility, thus limiting the specific activities included in the List.