

Recommendations made by the ACCREDIA Steering and Guarantee Committee relating to the definition of harmonized criteria for the verification of some requirements of the standard ISO/IEC 17024:2012 for the assessment and surveillance activities of Accredited Bodies operating certification of persons.

The following paragraphs concerning the standard ISO/IEC 17024:2012, briefly highlight the main references and definitions to be related to the recommendations made by the ACCREDIA Steering and Guarantee Committee.

Note: although some elements listed in the following table are already clearly defined by the standard ISO 17024:2012, they are also referred to here as being of particular significance with respect to the issue of impartiality.

The requirements of the standard referred to, accompanied by the notes taken from this standard, refer mainly to the issue of conflicts of interest for accredited bodies; furthermore, the requirements of the ACCREDIA Regulation RG-01-02 apply. For the definition of Examination Center (CdE), see the paragraph Terms and Definitions in § 0.3 of RG-01-02.

Note: 'Business partner' means an agency external to the CAB which is engaged in commercial development, supply of know-how and examiners.

Below are some definitions and paragraphs of the standard ISO/IEC 17024:2012, which refer specifically to the topics covered in the document.

3.15 Impartiality: Presence of objectivity.	NOTE 1 Objectivity means that conflicts of interest do not exist, or are resolved, so as not to adversely influence subsequent activities of the certification body. NOTE 2 Other terms that are useful in conveying the element of impartiality are: independence, freedom from conflict of interests, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment, balance.
4.3.2	The certification body shall act impartially in relation to its applicants, candidates and certified persons.
4.3.3	Policies and procedures for certification of persons shall be fair among all applicants, candidates and certified persons
4.3.4	Certification shall not be restricted on the grounds of undue financial or other limiting conditions, such as membership of an association or group. The certification body shall not use procedures to unfairly impede or inhibit access by applicants and candidates.

4.3.6	The certification body shall identify threats to its impartiality on an ongoing basis. This shall include those threats that arise from its activities, from its related bodies, from its relationships, or from the relationships of its personnel. However, such relationships do not necessarily present a body with a threat to impartiality.
5.2.1	Completion of training may be a specified requirement of a certification scheme (see 8.3). The recognition/approval of training by the certification body shall not compromise impartiality or reduce the assessment and certification requirements.
5.2.2	The certification body shall provide information regarding education and training if they are used as pre-requisites for being eligible for certification. However, the certification body shall not state or imply that certification would be simpler, easier or less expensive if any specified education/training services are used.
5.2.3	Offering training and certification for persons within the same legal entity constitutes a threat to impartiality.
6.1.8	When a certification body certifies a person it employs, the certification body shall adopt procedures to maintain impartiality.
6.2.2.1	Examiners shall meet the requirements of the certification body. The selection and approval processes shall ensure that examiners: <ul style="list-style-type: none"> a) understand the relevant certification scheme; b) are able to apply the examination procedures and documents; c) have competence in the field to be examined; d) are fluent, both in writing and orally, in the language of examination; in circumstances where an interpreter or a translator is used, the certification body shall have procedures in place to ensure that it does not affect the validity of the examination; e) have identified any known conflicts of interest to ensure impartial judgements are made.
6.2.2.3	If an examiner has a potential conflict of interest in the examination of a candidate, the certification body shall undertake measures to ensure that the confidentiality and impartiality of the examination are not compromised. These measures shall be recorded.
6.2.3.2	If other personnel involved in the assessment have a potential conflict of interest in the examination of a candidate, the certification body shall undertake measures to ensure that confidentiality and impartiality of the examination is not compromised. These measures shall be recorded.

6.3.1	The certification body shall have a legally enforceable agreement covering the arrangements, including confidentiality and conflict of interests, with each body that provides outsourced work related to the certification process.
6.4	Other resources The certification body shall use adequate premises, including examination sites, equipment and resources for carrying out its certification activities.
7.1.2	The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. The records shall be kept for an appropriate period of time, for a minimum of one full certification cycle, or as required by recognition arrangements, contractual, legal or other obligations.
7.2.4	Information provided by the certification body, including advertising, shall be accurate and not misleading.
7.4.2	Security policies and procedures shall include provisions to ensure the security of examination materials, taking into account the following: <ul style="list-style-type: none"> a) the locations of the materials (e.g. transportation, electronic delivery, disposal, storage, examination centre); b) the nature of the materials (e.g. electronic, paper, test equipment); c) the steps in the examination process (e.g. development, administration, results reporting); d) the threats arising from repeated use of examination materials.
9.3.5	Appropriate methodology and procedures (e.g. collecting and maintaining statistical data) shall be documented and implemented in order to reaffirm, at justified defined intervals, the fairness, validity, reliability and general performance of each examination, and that all identified deficiencies are corrected.

The table below contains six columns:

- the first shows the sequential number;
- the second shows the reference paragraph of the standard ISO/IEC 17024:2012;
- the third shows the type of conflict (macro-category);
- the fourth shows examples taken as references by the Committee;
- the fifth shows the survey modalities which can be implemented for verifying the conflict of interest;
- the last one shows a brief assessment regarding acceptability or non-acceptability of the situation/activity with regard to a conflict of interest.

This table can be used to develop the risk analysis document, or as a checklist for doing internal or external audits.

In the case of UNI PdR or standards relating to professions, any additional/specific requirements regarding the management of impartiality must be taken into account and reported within the applicable PdR/standard. Where the possibility of simplifications reported in the UNI procedures/standards is envisaged, the CAB should keep a record of the evaluation conducted.

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
1.	<p>4.3.2</p> <p>6.2.2.1</p> <p>6.2.2.3</p> <p>6.2.3.2</p> <p>6.3.1</p>	Risk: own interest, familiarity	Conflict of interest between an examiner or overseer (invigilator or proctor) and a candidate.	Files submitted for surveillance. Verification of task appointments.	<p>Not acceptable if the collaboration activity has ended more than 2 years previously.</p> <p>The following is required:</p> <ul style="list-style-type: none"> • Before accepting the assignment, the examiner views the list of candidates and the relative company they belong to (where applicable) and clarifies the possible presence of familiarity with one or more candidates participating at the exam session.

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					<ul style="list-style-type: none"> • The CAB must communicate the list of candidates explicitly referring to the post in question to the examiner/supervisor together with the clause relating to the declaration of any conflict of interest with one or more candidates. • The examiner/supervisor must refrain from participating in the examination activities of the candidate/s for whom s/he has a declared familiarity, leaving the activity to another examiner.

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
2.	4.3.2 6.2.3.2 6.3.1	Risk: own interest, familiarity	Conflict of interest between an application reviewer/decision maker/veto power and a candidate.	Files submitted for surveillance. Verification of confidentiality commitments and methods of resolving conflicts of interest for other personnel involved in the assessment.	Acceptable if the collaboration ended more than 2 years previously. The following is required: <ul style="list-style-type: none"> The CAB shall have a policy or procedure to identify and manage conflicts of interest with other personnel involved in the assessment; The CAB shall demonstrate that it has appointed other personnel involved in the assessment following an evident conflict of interest.
3.	4.3.3 6.1.8	Risk: own interest, familiarity	Full-time employees or collaborators of the CAB, or of the examination center request to be certified by the CAB/examination center.	Evaluation of the CAB's procedures/fees.	Acceptable, provided that the CAB has a policy/procedure regarding potential conflicts of interest, which could emerge in the certifica-

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					<p>tion activities of persons, with particular reference to the contact persons operating in the various CAB offices/agencies.</p> <p>It is acceptable for the activity to be free of charge.</p>
4.	4.3.3	Risk: own interest	<p>a) The issuance of a lower price invoice is calculated for the user in accordance with an agreement, before the agreement was reached.</p> <p>b) The CAB applies discounts not directly included in the pricelist to gain visibility on the market and development opportunities.</p>	<p>Evaluation of CABs pricelist and invoices.</p> <p>Evaluation of the risk analysis prepared by the CAB.</p>	<p>a) Acceptable. The Accreditation Body does not interfere with an accredited CAB's commercial policies¹.</p> <p>b) Acceptable. The Accreditation Body must limit itself to verifying that the CAB has complied with the cost policy it has adopted, in which any discounts shall be made explicit.</p>

¹ 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).

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
5.	4.3.3	Risk: own interest	a) The CAB issues the invoice not directly to the candidate but to the exam center or other business partner.	Evaluation of CABs pricelist and invoices.	Acceptable. The CAB must have evidence on a sample basis that the examination center/business partner invoices the candidate for the cost of certification in line with the pricelist.
6.	4.3.6	Risk: self-review, own interest	a) The CAB, or its members, has shares or holdings in training organizations or in an examination center or provides training. b) The CAB, or its members, has shares or stakes in companies that provide other support services to candidates.	Check made of the CAB's financial statement to find out about any participations or examination of Chamber of Commerce certificates or from the CERVED survey "Participation form" (This activity is already normally carried out).	a) Acceptable, provided that the risk analysis includes such situations of conflict of interest: if the training activity is in the same scope as the certification, there must be a separation between the training activity and the certification, (e.g. different staff managing the two activities). b) Not acceptable that the examination center provides

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					<p>other forms of support to the candidates or other activities in conflict with the CAB including consultancy for the preparation to certification exams not provided in the scheme (e.g. exam simulations with the same database of questions, etc.) and for the maintenance of the certification. The examination center must behave as if it were a certification body: the website of the examination center must not offer services in conflict with the CAB.</p> <p>A conflict of interest between training activities</p>

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					and certification activities is also configured with regard to roles such as "Scientific Director" of a course, or "Tutor".
7.	<p>5.2.1</p> <p>5.2.2</p> <p>5.2.3</p> <p>7.2.4</p> <p>4.3.4</p>	Risk: self-review, own interest	<p>The site, brochures, regulations or calls for examinations implicitly or explicitly mean that:</p> <ul style="list-style-type: none"> The evidence of training at the CAB/examination center or other organizations suggested by them may constitute an advantage for the candidate in terms of easiness of the examination or lower costs incurred. It is necessary to integrate training in some organizations suggested by the CAB. 	<ul style="list-style-type: none"> Chamber of Commerce profile verification to identify organizations related to the CAB (activity already normally undertaken); Verification of the website, of the brochures, regulations and exam calls of the CAB and of the examination center. Verification and review of certification applications; Verification of the CAB's Regulations that allow courses delivered by different 	<p>It is not acceptable to allow only candidates who have attended a course at a training facility specified by the CAB/examination center to access the exam. It is acceptable to indicate the characteristics of the course that could meet the prerequisites for access to the exam. The communication and invoicing must clearly indicate the cost of the training and the exam. The promotional material of the examination center must be validated and monitored by the CAB.</p>

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
				<p>persons, even those not recognized by the CAB itself, but that guarantee coverage of all applicable requirements.</p>	<p>The examination center's website must not offer services that conflict with those of the CAB. Acceptable – that, as a prerequisite for accessing an exam, an attestation or specific certification has been previously obtained (e.g. enrolment on a professional register, after passing a professional qualification course).</p>
8.	<p>6.3.1 7.1.2 7.4.2 9.3.5</p>	<p>Risk: familiarity, confidentiality, own interest,</p>	<p>Threat of uncontrolled, voluntary or involuntary disclosure of information regarding the exam materials that can ensure the positive outcome of the exam for some candidates over others.</p> <p>a) The CAB/examination center does not manage activities with confidentiality and security:</p> <ul style="list-style-type: none"> The materials used for the exams (e.g. database of questions used for theoretical exams, sets of samples used for practical exams, etc.); 	<p>Verification of:</p> <p>a) Availability of a legally valid agreement with each examination center, as well as management procedures which also regulate the confidentiality and storage security of the materials used for the examinations and records of</p>	<p>Acceptable if the inquiry methods are respected.</p>

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
			<ul style="list-style-type: none"> c) Exam records of already certified candidates with the possibility that the related information may arrive specifically or randomly to certain candidates. b) The CAB/examination center conducts exam simulations before the exam with the same topics or set of samples. c) The CAB/examination center does not conduct a rotation of questions in the exam topics. d) The CAB decides with regard to certification after an exam conducted by the examination center on the basis of insufficient information, e.g. the examination center transmits only the total scores of the exam tests. 	<p>the exams already carried out. The contract with the candidate or the CAB's regulations must provide for appropriate commitments regarding the confidentiality of the examination material. The qualification and maintenance report at the examination center, which also deals with the question of confidentiality and security of the material used for the exams and the records of the exams. Safe separation of samples for practical tests. Confidential safekeeping of exam results of candidates already certified. Assignment of the responsibility for maintaining the</p>	

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
				<p>confidentiality of the resources used for the examination to one or more uniquely identifiable persons. Password to access the database of the questions of the theoretical exams.</p> <p>b) Evidence of use of sets of exam questions other than simulation and of sets of samples (not equipment) intended for training only.</p> <p>c) Preparation of specific procedures aimed at reaffirming the fairness, reliability, validity of the exam set. Method of random selection of questions and samples for exams.</p>	

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
				d) Documented review of the file including all stages of the outsourced processes (e.g. review of the application, notice of examination, examination tests and related assessments and instruments used).	
9.	6.3.1 6.4	Risk: own interest	a) Certification activities performed by the examination center. b) Certification activities performed by the examination center in-house (at the client's premises or other sites).	Verification of: a) Initial and periodic evaluation of the examination center for the qualification of the structure to guarantee the fulfilment of the requirements of comfort, safety and adequacy of the equipment and resources. b) Evaluation of the skills, resources and equipment of the examination center for	Acceptable if the methods of inquiry are respected.

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
				the provision of in-house certification services.	
10.	4.3.3	Risk: own interest	Certification issued directly by a professional association (The CAB coincides with the professional association).	Statute.	<p>Not acceptable, because it would be configured as a second-party verification (see law 4/2013, art. 7, attestation).</p> <p>Acceptable that an association constitutes a different legal entity, and that through this different legal entity, it performs certification activities, provided that the assessment process and the decision-making process on the issue of the certification guarantees independence and absence of conflicts of interest (e.g. a director of the association or member of another body within the association, cannot be part of</p>

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					the examination center or the decision-making body) and that this aspect is assessed in the risk analysis and appropriate risk mitigation actions are defined. An association may become an examination center.
11.	4.3.4	Closure to the market.	CAB which certifies only dependant staff, not offering the service also to external parties.	Certification Regulation.	Not acceptable. It is acceptable that a CAB, where a government administrative authority or a company or agencies with public participation is configured, may not have issued certifications to external parties, if it can demonstrate that it has implemented a management system (pricelist/agreement, communications available to the public, regulation/contracts etc.).

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					The CAB must inform the interested parties.
12.		ISO 17024 consultancy to another certification body.	Consultancy to another certification body.	Invoices.	Not acceptable that an ISO 17021-1 accredited CAB advises other CABs on management systems (and therefore also on ISO 17024). These restrictions do not apply if the CAB does not have ISO 17021-1 accreditation. See the decision of the Maintenance Group ISO 17021-1 of June 2021 ² . Acceptable if the other CAB belongs to the same group.
13.	4.3.3	Risk: own interest, self-review, familiarity.	The CB (directly or through an examination center) certifies the staff who work for a company with a management system certified by the same CB.	Risk analysis assessment prepared by the CB.	Acceptable. The staff used by the examination center and the CB as examiner or

² ISO 17021-1, § 5.2.5 applies to any MS consultancy regardless of its purpose and the consultancy in this context would be to help another conformity assessment body building its management system as per the MS clauses of ISO/IEC 17025 or ISO/IEC 17020 and this goes against clause 5.2.5 of ISO/IEC 17021-1

N°	Requirements of ISO/IEC 17024 (paragraph)	Typology of conflict	Example of activity/situation of conflict	Method of inquiry	Acceptability
					decision maker must be different from that used by the CB as an auditor and decision maker in the management system certification process in the previous 2 years.
14.	5.2.3	Risk: own interest, self-review, familiarity.	The CB provides training services directly or through an examination center to personnel who apply for certification to the same CB and vice versa.	Risk analysis assessment prepared by the CB.	Acceptable. The CB/examination center staff involved in the examination (examiner) or certification decision must be different from the staff used for the training activities (Teacher) carried out in the previous 2 years.