

ACCREDIA policy for the performance of remote assessments

This document was prepared by the "Eredità Covid-19" Working Group, set up within the ACCREDIA Steering and Guarantee Committee, and it defines ACCREDIA's policy for performing remote assessment activities.

The document is a guide for a consistent management of ACCREDIA's remote assessment activities and, at the same time, it can also be a useful support for accredited CABs that have to evaluate the feasibility and subsequent management of remote audits. It is structured as a table, representing a series of specific actions to be considered for a series of macrothemes.

The macrothemes identified are the following:

- 1) **IT equipment** (as well as video, drones, cameras, etc.) to be used, and verification of their availability, in order to authorize the remote assessment (also for the contractual aspects between ACCREDIA and the CABs, and between the CAB and its clients);
- 2) Activities for which it is necessary to **exclude the use of remote assessment** in the ACCREDIA Departments (and for the different types of CABs);
- 3) Use of **recordings**. Permissions to be requested and forms of protection of sensitive data and company know-how;
- 4) Specific focus on ACCREDIA **witness assessments** performed on certification and inspection bodies;
- 5) considerations resulting from the use of remote assessment for **Mystery Audits** and for **unannounced assessments**;
- 6) Any related revision of the ACCREDIA **risk analysis**.

MACROTHEME		ACTIONS PROPOSED
1a	IT tools to use	Definition of an equivalent system in terms of efficiency with on-site assessments through the following steps: <ul style="list-style-type: none"> • identification of the ICT tools most suitable for the type of assessment (e.g. connection platform, need for mobile cameras, photos/video recordings, scanners, etc.); • identification of the type of all ICT tools to be used in each assessment with relative adequacy to the objectives of the activity to be conducted remotely (e.g. video using WhatsApp) with the aim of establishing whether it is effectively acceptable and satisfactory; • verification of the availability of the ICT tools by the CAB and the audit team;

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		<ul style="list-style-type: none"> • verification of the feasibility of using ICT in portable mode for the entire duration of the audit by the CAB and its team; • verification of the accessibility of information (both as a level of computerization of the CAB and as protection from external access) through the remote connection; • verification of security (also in terms of data sharing) of the ICT tools to be used also according to the requirements of the GDPR (are all the platforms used safe from this point of view?); • the use of any previously recorded videos is acceptable but can only take place in justified and well documented cases in the feasibility analysis; • evaluation of possible training needs for the assessors to be appointed.
1b	Terms of the contracts	<p>CURRENT STATUS</p> <p>§ 4.9 of the CO rev. 07 and the General Regulations for accreditation provide for the possibility that ACCREDIA carries out its assessment activities also in remote mode.</p> <p>For each remote assessment, an informative communication is sent to the CAB in accordance with Article 13 of the European Data Protection Regulation 2016/679 (GDPR).</p> <p>POSSIBLE FURTHER REQUIREMENTS</p> <p>In the surveillance cycle, at least one of the assessments must be carried out in presence or in mixed mode.</p> <p>Formalise any possible need to carry out follow-up activities, with related costs met by the CAB, in the event that the remote assessment may prove unsatisfactory following its conduct.</p> <p>Evaluate whether the performance of remote activities may have an impact on the overall duration of the assessment times (the document currently in force IAF MD 4 already provides for the possibility of carrying out parts of the activities on different occasions), providing for the possibility of extending the duration over a longer period of time, as it could be more complicated to coordinate a large assessment team remotely. In such cases, the System (Lead) Assessor will still have to ensure the coordination of the team for the entire duration of the activities.</p> <p>In the case of assessments performed abroad, time zone differences must be taken into account.</p>

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		<p>Issue rules regarding the sharing of documentation and records also for cases in which it is requested in advance.</p> <p>This is in order to ensure consistency of behaviour on the part of the various ACCREDIA assessment teams.</p> <p>Define the possibility for the CAB to request ACCREDIA to change the assessment from remote, provided it is able to do it, with one in presence.</p> <p>Evaluate the need to further detail the privacy and copyright clauses, in the case of the storage of audio/video recordings (see point 3 below).</p>
2	<p>Exclusion of use of remote assessments</p> <p>NB: not referred to mixed modality assessments</p>	<p>On-site assessments:</p> <ul style="list-style-type: none"> initial assessments in cases where the CAB is not already accredited for other areas (the use of the mixed modality can be evaluated); surveillance and/or supplementary assessments in critical cases; e.g. preliminary assessment for the restoration of suspended accreditation; extension assessments (limited to cases considered complex); <p>In addition:</p> <ul style="list-style-type: none"> in the surveillance cycle at least one of the assessments must be carried out either in presence or in mixed mode; any non-applicability, in the first instance, must always depend on the degree of computerization of the CAB's management system under assessment.
3	Use of recordings	<p>Limit the use in the audit reports of screenshots of the CAB's or the organization's documentation.</p> <p>In the case of a witness assessment, check the availability of the organization to allow videos of staff during site inspections in the production departments.</p> <p>Establish whether, as assessment recordings, videos can be acceptable, in justified and documented cases in the feasibility analysis, and, if so, ensure adequate traceability and storage, in compliance with privacy and copyright legislation.</p>

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<p>4</p> <p>Focus on witness assessments (applicable for DC)</p> <p>NB: not referred to mixed modality assessments</p>	<p>Exclusion of use of remote assessments:</p> <ul style="list-style-type: none"> • in cases where the CAB carries out its own audit in presence, except in cases regarding the feasibility analysis; • in cases where it is not possible for the audited organization to ensure complete auditing of all processes and information using the ICT platform; • for those sectors in which the use of ICT equipment may not be allowed (for example, some areas of food, military, hospital, aerospace, etc.); • for the PRS scheme, non-applicability must depend on the professional person under examination (e.g. it may be feasible in cases where a practical test is required with the use of digital equipment); • for the regulated area, non-applicability should be determined according to the scope and, where required, by the module being assessed; <p>It is not possible to perform the assessment by remote mode in the following cases:</p> <ul style="list-style-type: none"> • where it is not possible to guarantee a stable internet connection; • for all areas of accreditation in which a scheme owner has defined specific limitations; • where the CAB or the audited organization request to carry out the assessment activity in a traditional way (on-site). <p>In cases where remote assessment is applicable, assess whether it can be carried out for all sectors/areas of activity.</p> <p>Evaluate the possible need to organize a simulation in advance regarding how the remote audit will be performed by the CAB, especially in cases where site inspections of external facilities (e.g. laboratories, training centres) or also construction sites have to be undertaken.</p> <p>In carrying out the witness assessments, the ACCREDIA assessor must limit him/herself to the role of observer, however, by participating remotely, situations could arise in which s/he must intervene to request, for example, an ad hoc video, the double sharing of documents by the audited organization. Regulate the intervention allowed in these cases.</p>

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5	Mystery and unannounced audits	<p>Mystery audits: in most cases they can also be carried out exclusively by remote mode by making use of the telephone, contacts or requests by email, etc.</p> <p>Unannounced assessments: while favouring on-site performance, in order to have a direct approach with staff and the workplaces, also provide for the possibility of remote performance to be defined in the accreditation procedure/regulations.</p> <p>Examples: contact an organization where an audit is being carried out by the CAB organized over several days and ask to speak with the auditors on the last day of the audit, contact the CAB by telephone and possibly identify situations in which it is necessary to request a direct connection (e.g. to interview the staff and/or request the inspection of premises/equipment) or a sampling of files may be requested (e.g. by requesting the CAB to transmit all the documentation within a short period of time (e.g. 1h).</p>
6	Revision of the ACCREDIA risk analysis	<p>Evaluation of possible impacts on the following points of Regulation RG-21:</p> <p><i>2a) events unfavourable to objectivity with specific reference to points 1 (incorrect gathering of information by personnel operating at various levels and incorrect collection or interpretation of objective evidence) and 3 (lack of resources: restrictions on access to data such as the lack of resources (human and material) which could constitute a further obstacle to objectivity);</i></p> <p><i>2b) events unfavourable to impartiality with specific reference to point 3 (familiarity [or trust]): events that originate from auditors who are too familiar with the CAB under assessment. During an assessment it may happen that the auditor relies too much on her/his counterpart, leaving her/him the choice and the presentation of cases (examples, files), thus presenting the risk that the evidence of the audit will be modified or influenced).</i></p>
7	Eventual positions taken by the CAB	Part to be completed, on the basis of contributions concerning the associations of accredited CABs.