

NABCB Policy on Management of Extraordinary Events or Circumstances

0.0 Background Information:

The purpose of this document is to define the NABCB policy regarding actions to be taken by Conformity Assessment Bodies (Certification, Inspection, V&V), which are accredited or applicant with NABCB, in the event of any emergency situation that prevents access to certified clients, such that planned activities, such as surveillance or recertification visits, cannot take place at that time.

0.1. Reference Documents (Latest versions unless specified):

- IAF ID 3 - Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations
- IAF MD 4 – The Use of Information and Communication Technology (ICT) for Auditing / Assessment purposes
- BCB 003 - NABCB Policy on Conducting Remote Assessment
- IAF FAQs published by IAF on website <https://iaffaqs.com/>

0.2. *Definition - Extraordinary event or circumstance:* *A circumstance beyond the control of the organization commonly referred to as “Force Majeure” or “act of God”. Examples are war, strike, riot, political instability, geopolitical tension, terrorism, crime, pandemic, flooding, earthquake, malicious computer hacking, other natural or man-made disasters.*

1.0 Requirements for Conformity Assessment Body

- 1.1. The CAB should assess the risks of continuing certification and establish a documented policy and process, outlining the steps it will take in the event a certified/inspected organization is affected by an extraordinary event.
- 1.2. If a CAB is unable to complete surveillance audits because of the state of the organization or travel restrictions, CAB may give flexibility in audit dates. While managing required surveillance audits, CABs must follow their own processes, which may include suspension, and as per respective accreditation standards like ISO/IEC 17021-1, ISO/IEC 17065, ISO/IEC 17020, ISO/IEC 17024 & ISO 14065 etc. Surveillance activities must be completed as early as possible once the current emergency status has been lifted and as soon as travel to restricted areas is possible and businesses are operational, but should not normally exceed three

months from the due date or as announced by NABCB considering the specific extraordinary event or circumstance.

- 1.3. In case it is not possible to complete the surveillance activities within the timelines as mentioned above, a further extension of another 3 months may be given in case where the remote audit of client cannot be carried out in the initial extension of 3 months, thus allowing a period of maximum 6 months as per IAF ID3.
- 1.4. Any extension should be well documented with legitimate reasons for granting extension.
- 1.5. All Subsequent surveillance activities should continue in line with the original programme.
- 1.6. Extended periods between surveillance visits may result in a need for additional surveillance activities during the certification cycle. The CABs should consider other means of monitoring that may be available such as telephonic interactions, internet based assessments and desktop reviews of submitted documentation.
- 1.7. If a recertification audit or other recertification requirements cannot be completed prior to the expiration of accredited certification, NABCB is allowing CABs to extend the certification up to six months from the date of the expiration of the certification.
 - If the CAB is unable to gain confidence in the system for which the extension would be granted, the CAB must follow its own process, including suspension if appropriate.
 - When the CAB successfully completes the recertification activity, the expiration of the renewed certification should be based on the original recertification cycle. This means not providing the organization an additional six months of certification. When the organization is recertified, it will not be for three years from the recertification decision, but three years from the previous expiration date.
 - If it is not possible for CB to conclude the recertification audits even within this extended six months period due to prevailing travel restrictions, the CAB may further extend the certificate validity by another six months, preferably in intervals of 3 months, i.e. an extension of 12 months in total. However, if this time-frame, from the certification date exceeds 12 months, the CB should complete the recertification audit as possible using remote means. In all those cases where the processes cannot be remotely assessed in an effective way to the satisfaction of the CAB, the certification scope shall be partially reduced

or the certificate shall be completely withdrawn, and a new initial audit shall be required. In any case, a decision shall be made taking also into consideration the updated risk associated with the operational control capability of the organization in the extraordinary conditions and the type of certification scheme. In this case, the expiration of the renewed certification should be based on the original recertification cycle.

Note: Provisions in IAF ID 3 and IAF MD 4 may be considered by CAB for conducting remote assessment as they relate to alternative ways to audit an organization if appropriate.

- 1.8. For validation and verification, particularly the greenhouse gas (GHG) validation and verification at project or organizational level, they are normally one-off conformity activities, therefore the IAF ID3 guidelines related to surveillance, recertification, extension of certification and recertification cycle etc. shall not be applicable. However, for the assessment and accreditation of validation and verification bodies (VVBs), IAF ID3 can be used and the remote approaches as per IAF MD4:2018 can be used by VVBs.
- 1.9. CABs may carry out Initial certification audit (Stage-1 & 2) through Remote audits (in part or full) considering the risk factors and based on its risk evaluation process. However, the risk factors may vary for specific schemes and/or scope sectors, and it shall be the responsibility of the CAB to ensure that risk of initial certification audit through Remote is low. CAB shall have documented procedure for conduct of remote stage-1 & 2 audits (part/complete). In case of complete remote stage-2 audit is conducted, the CAB shall perform an additional onsite visit to client site to review the critical manufacturing operations within 6 months of the remote audit, once the current emergency status has been lifted and as soon as travel to restricted areas is possible and businesses are operational or if not possible to do so due to the reasons as stated, CAB shall carry out onsite visit of the client manufacturing operations within a year after the remote audit.

The CB shall ensure that a certificate is issued after complete evaluation of all the applicable requirements of ISO/IEC 17021-1 (9.3.1.2 Stage 1 and 9.3.1.3 Stage 2) through a complete and effective audit of the client's management system, followed by a successful review and decision making activities.

- 1.10. In case of an Extraordinary event or circumstance, the CAB shall evaluate that its client and/or its resources is / will be seriously affected and the extent of it, and shall document the justification for having audits / inspections exceeding the due date.

- 1.11. Both NABCB and CAB shall inform CABs and certified clients respectively of any on-going developments and any changes to the policy or processes implemented.
- 1.12. Where a standard or scheme provides no flexibility with respect to extraordinary events or circumstances that has occurred, guidance and an agreed way ahead shall always be sought from the NABCB, and/or the scheme owner as applicable.

2.0 Records:

- 2.1. The CAB shall maintain complete records of actions taken, together with the rationale behind decisions on actions taken. These records shall be made available for NABCB to review upon demand.
- 2.2. The CAB shall maintain the overall process and/or plan it shall follow in managing clients affected by the extraordinary event or circumstance.
- 2.3. The CAB shall maintain a list of NABCB accredited certifications/inspections affected whereby the audit/inspection is being postponed and/or the certificate is being extended, including the following:
 - Client name, city/state/province/country, standard(s), (normal) certification expiration, status (e.g., delayed audit, extended certification) and specific reason for the exception (e.g., organization shutdown, travel restrictions for audit team etc.).
 - Specific to Information Security Management Systems (ISMS), this also shall include ISO/IEC 27001 certifications where ICT activity goes above 30% and the list shall include the certificate number, audit type, percent use of ICT, and reason for ICT.

3.0 NABCB Actions:

At the next office assessment, the NABCB assessment team shall also focus to assess the CAB for it managed the extraordinary situation or circumstance appropriately in accordance with the CAB's documented process and considered the response to each client on an individual basis considering the unique set of circumstances.

4.0 Specific NABCB Accreditation Activity:

- 4.1. NABCB shall also manage its accreditation assessments by considering alternative methods as mentioned in IAF ID 3, IAF MD 4 and NABCB Policy on Conducting Remote Assessment, to continue oversight on accreditations granted.
- 4.2. For accredited conformity assessment bodies, in case of exceptional scenario, where the provision of remote assessments as defined above is not possible, NABCB may consider extending the validity of accreditation in case of re-accreditation and postponing the planned/due on-site surveillance assessments as follows.
 - 4.2.1. In case of re-accreditation, no extension shall be granted to any CAB more than 6 months beyond the validity of accreditation i.e. 3 months extensions twice may be granted, to complete the reaccreditation process. The office and/or witness assessment shall be carried out remotely, where feasible. The second extension of 3 months shall only be granted in exceptional circumstances, provided the CAB agrees to undergo and complete the reaccreditation process within the second extension of 3 months. If any accredited CAB is not able to complete the reaccreditation process within this extended period (6 months max.), as granted by NABCB, the accreditation shall lapse and the continuity of accreditation shall not be maintained by NABCB. Also, any request for extension of accreditation period shall only be considered provided there are no outstanding payments to be paid by CAB to NABCB.
 - 4.2.2. In case of Surveillance assessment, no extension shall be granted to any CAB for completing the Surveillance process 6 months beyond the due date for surveillance i.e. 3 months extensions twice may be granted, to complete the Surveillance assessment process. The assessment shall be carried out remotely, where feasible. The second extension of 3 months shall only be granted in exceptional circumstances, provided the CAB agrees to undergo and complete the surveillance assessment process within the second extension of 3 months, and that there are no outstanding payments to be paid by CAB to NABCB. In case of last Surveillance in an accreditation cycle, only one extension of 3 months shall normally be given, so that there is sufficient gap between the last surveillance assessment in an accreditation cycle and the reassessment of a CAB. If any accredited CAB is not able to undertake the Surveillance assessment within the extended timeline of 6 months, the accreditation of CAB shall be suspended by NABCB, and further action shall be taken as per NABCB Accreditation Procedure.



- 4.2.3. Any extension of validity for Re-assessment / postponement of Surveillance in case of extraordinary events or circumstances shall only be granted based on written request from CAB and after the approval from the NABCB Accreditation Committee.
- 4.2.4. For initial accreditations granted by NABCB based on remote assessment, the first Surveillance assessment to the extent feasible shall be carried out on-site, if the situation so permits. The first Surveillance however shall be conducted no later than 1 year from the date of initial accreditation. In case due to extraordinary situation and travel restrictions in place, the first surveillance is also carried out remotely, and which shall be decided by NABCB on the basis of performance of the CAB in initial assessment, the risk assessment of the CAB and the merits of the situation, the second surveillance shall be carried out on-site within 18 months from the date of initial accreditation.
- 4.2.5. In other cases, if NABCB determines that on-site assessment is not feasible in view of the extraordinary situation and the prevailing travel restrictions, even when the last assessment (Surveillance / Reassessment) was conducted remotely, NABCB, may consider based on the performance of the CAB in the previous assessments, the risk assessment of the CAB and the merits of the situation, carrying out consecutive office assessments using remote techniques within a time period of 2 years. No CAB shall undergo Remote Assessment by NABCB continually for more than 2 years.
