IAF/ILAC Approach to Remote Peer Evaluations of Regions and Single Accreditation Bodies during the COVID-19 Pandemic
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1. FOREWORD

Historically the performance of peer evaluations of accreditation bodies has been mainly based on on-site exercises. During the COVID-19 pandemic, governmental and health authorities’ confinement dispositions have raised critical difficulties for the maintenance of such an approach. These challenges have, however, accelerated the development and dissemination of information and communication technologies supporting on-line meetings, sharing files and devices’ screens, etc. which are useful tools to be integrated within the peer evaluation process.

How to properly balance the traditional approach with the use of remote tools for peer evaluations under normal circumstances and considering the specific risks of using different evaluation techniques is still an exercise to be undertaken.

Whatever the case, the IAF/ILAC perspective is that, under normal circumstances, it would not be desirable for peer evaluations to become a complete digitalized remote exercise in the future. In addition to establishing compliance with specified requirements, a peer evaluation should also be an opportunity for ideas, problems, and solutions to flow collaboratively between the team and the accreditation body under evaluation and also within the peer evaluation team. This is indispensable to sustain similar levels of harmonization and maturity and to encourage improvements within the accreditation community. On-site, face-to-face evaluations are still considered to be a more beneficial and efficient approach and will always have a place in evaluation protocols in the future.

This document was developed to support IAF and ILAC in keeping the necessary level of harmonization and confidence in the IAF/ILAC and Regional peer evaluation systems during the COVID-19 pandemic. The document reflects the IAF/ILAC position that performing fully remote peer evaluations of Regions and single accreditation bodies is unavoidable in the short term.

Peer evaluations can, and normally do, use several evaluation techniques such as file reviews, interviews and on-site witnessing of accreditation bodies performing assessments or observing Regional groups evaluating accreditation bodies.

IAF/ILAC current requirements applicable to Regional groups when performing peer evaluations of accreditation bodies (IAF/ILAC A2) and IAF/ILAC evaluating Regional Groups (IAF/ILAC A1) are generally silent regarding subtleties of the different evaluation methods, their advantages and disadvantages or recommendations on how to combine them, considering the specific circumstances and risks.

While IAF/ILAC A1 and A2 do not elaborate on issues such as the accreditation body size, complexity, geographical coverage, proven maturity and past performance, etc., which seem indispensable for a risk-based approach to peer evaluations, they are quite prescriptive regarding the number and nature of witnessing activities to be performed (A2 Annex 2, B 2.3) including referring to the witnessing of on-site assessments which at this time may not be

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Footnote

1 Current available definitions of peer evaluation do not properly reflect these elements:
- ISO/IEC 17000 (and ISO/IEC 17040): peer assessment - assessment of a body against specified requirements (5.1) by representatives of other bodies in, or candidates for, an agreement group (9.10)
  Note 1 to entry: “Candidates” are included for the situation where a new group is being formed, at which time there would be no bodies in the group.
  Note 2 to entry: The term “peer assessment” is sometimes referred to as “peer evaluation”.
possible with a significant number of accreditation bodies currently limited to performing remote assessments.

Policies established by this document are generally consistent with IAF/ILAC A2 dispositions. It needs to be recognized, however, that they provide room for a more flexible approach regarding remote witnessing activities when compared with the prescriptive nature of the current rules as contained in IAF/ILAC-A2.

This flexibility is also consistent with a remote peer evaluation focused on its goals and not on its processes.

Note: IAF/ILAC A1 does not refer to onsite activities, therefore the policies listed here could directly be used for the peer evaluation of Regions.

2. SCOPE

This document provides guidance on how to fulfil the requirements of IAF/ILAC A1 and A2 during the COVID-19 pandemic.

3. REFERENCES

- ISO/IEC 17011:2017
- IAF ID 3
- IAF MD4
- ISO 9001 Auditing Practices Group Guidance on remote audits
- IAF and IAF/ILAC FAQs
- IAF/ILAC A1 and A2

4. DEFINITION

Remote peer evaluation: IAF/ILAC evaluation of a Regional arrangement group and the IAF/ILAC or Regional peer evaluation of a single accreditation body (AB) using information and communications technology (ICT) tools.

5. POLICY

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<th>Policy elements</th>
<th>Justification and other considerations</th>
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<td>Until further decision by the IAF/ILAC JMC or the responsible Regional structure peer evaluations starting from 2021-01-01 can be, and normally will be, performed as fully remote exercises.</td>
<td>The current pandemic circumstances would not be consistent with another systematic approach. To keep a peer evaluation open for a long period (e.g. doing office activities remotely from the beginning of 2021 and waiting for normal circumstances to perform witnessing activities remotely) would be a disproportionate administrative and logistical burden and also a technical risk (lack of representativeness of the peer evaluation outcome after a long period). A mitigation strategy needs to be established for any specific risk coming from performing a fully remote peer evaluation. If needed, an on-site</td>
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<td>additional peer evaluation will be performed within a shorter period (e.g. 2 years). Peer evaluations planned as a remote evaluation and scheduled to start at least 3 months after an agreed normalization reference date (i.e. the restrictions caused by the COVID-19 pandemic have ended) should be adapted to be conducted using the traditional on-site approach valid at that time.</td>
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<td>Regions shall, to the extent necessary, develop policies and procedures, and conduct training to transition effectively to remote evaluations taking account of the following IAF/ILAC requirements.</td>
<td>Deviations from the traditional process shall be duly justified, documented and limited to those strictly necessary. The extension of the time of a remote peer evaluation or the use of file reviews based on a risk assessment are not seen as deviations from the traditional procedures.</td>
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<td>Remote evaluations shall follow as closely as possible the usual peer evaluation process established in IAF/ILAC A1 &amp; A2. All activities must be covered except witnessing (see below).</td>
<td>Witnessing can be minimized unless there are facts from the previous peer evaluations (or from other relevant sources of information such as complaints) favouring a different approach. Reducing the level of witnessing activities neither means collecting less or less representative information nor reducing the time dedicated to peer evaluations. It means that some witnessing will be replaced by other evaluation techniques. It can be an added value to extend the files reviewed, and to have more time for interviews including related parties as seen useful.</td>
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| The amount of witnessing for each evaluation shall be determined according to the following:  
  • Where a level 3 standard has been witnessed for two successive evaluations and there are no significant findings that require further witnessing e.g. to follow up corrective actions, witnessing can be exempt.  
  • Evaluations must take into consideration how an AB is using remote assessments, including processes, procedures, training of personnel etc.  
  • Witnessing of on-site assessments can be replaced with remote witnessing of remote or on-site assessments. | Where possible, initial AB/Regional peer evaluations shall be performed on-site. Initial evaluations may be performed remotely where all activities, including observation/witnessing, can be covered effectively. Where an on-site pre-evaluation has included an on-site witnessed assessment for a level 3 scope(s) with no significant findings, Where possible, initial evaluations will be undertaken using the traditional processes. However, if an on-site evaluation or assessment cannot be undertaken due to COVID-19 pandemic, and supported by risk assessment, remote activities or a combination of remote and on-site activities can be used. Remote activities are to be in accordance with IAF MD4. |
Policy elements | Justification and other considerations
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Witnessing can be exempt for that scope(s). | 
Extensions of scope to include a new level 3 standard must include observing/witnessing of either an on-site or remote assessment. Observing/witnessing may be conducted remotely. | 
Evaluation programs must be adapted to take account of the use of remote activities. | Remote evaluations typically require additional preparation by both the evaluation team and the AB and are longer in duration. Preparation should include checks of connectivity between team members, the AB, other sites as necessary. Additional preparation may apply as listed in the ISO 9001 Auditing Practices Group Guidance on remote audits.

Regions/ABs shall not be subject to two consecutive completely remote full evaluations unless explicitly decided by IAF/ILAC. | The benefits from face to face sharing of experiences should not be postponed indefinitely.

More detailed information about remote peer evaluations/assessments is provided by several documents established by Regions already.