Remote Auditing Policy

Responsibility and Authority

The Certification Manager is responsible for: -

❖Ensuring the effectiveness of this process within the management system;

❖Ensuring all relevant personnel are aware of this process;

References

The following reference documents are utilised to determine the processes for compliance operated by LMS

CERTIFICATIONS PVT. LTD., within the management system: -

Standard / Technical Standard
All listed standards within the Reference documents; this includes the management system standards, competency requirement standards and the IAF mandatory documents (MD)-IAF MD 4:2023.

Summary

This policy covers the actions taken for certification and conformity assessment during C-19 outbreak

Detail

1. Introduction

1.1 Every organisation is continuously exposed to opportunities, challenges, and risks in a normal business environment. However, extraordinary events or circumstances beyond the control of the organisation happen. At present, the world is facing the challenge of the outbreak and continued spread of coronavirus (COVID-19). LMS is continuing to monitor EIAC and external advice in order to assess risks and undertake contingency planning.

1.2 It is important during this period that end-users and the wider community can continue to rely on the services of LMS as a EIAC accredited certification body and therefore that LMS and clients it certifies continue to work together to ensure that the principles of certification are maintained. Although some of the traditional practices employed by LMS to assess clients may not be appropriate due to current restrictions, it remains a priority that the technical validity of its service and of the services of the client is maintained. Therefore, LMS need to be able to demonstrate reasonable due diligence, mutual understanding and trust and to establish an appropriate course of action in response to this extraordinary event.

1.3 The aim of this document is to outline the requirements and provide guidance to LMS certified clients on the appropriate course of action. During the COVID-19 outbreak, this document shall take precedence over existing LMS publications where conflicts in requirements are identified.

1.4 The guidance and requirements included within this publication are consistent with the advice published by LMS in its policy Accreditation and Conformity Assessment during the Covid-19 Outbreak

2. Scope

The requirements and guidance contained in this document apply to all LMS Certified clients and LMS related personnel.

3. Impact of the COVID-19 Outbreak on the Generic Operation of the LMS client

3.1 It is recognised that the current outbreak may temporarily affect the ability of LMS to conduct its activities and/or maintain compliance with the requirements for certification. Operations may be affected in a number of ways such as site closure, staff shortage, restricted access to supplies and services, sample delivery, additional workloads, reduced demand for services etc. LMS shall deploy its risk management procedures taking into account the following:

3.1.1 Suspension of service: if a client is required to stop work for a short period of time that does not affect the delivery of its service to any great extent (e.g. no or minimal impact on service delivery time) then there is no need to inform LMS. Records of any incident or outcome need to be retained and the LMS kept informed. If the service has to be suspended for more than 2 weeks, then the LMS assessment Manager shall be informed.

3.1.2 Where LMS can continue to provide a service but may have to deviate from its usual processes, a review of the situation and risks shall be conducted and shall include, at least, an evaluation of LMS's current and expected future situation. Where this review identifies a significant risk to maintaining LMS certification the client shall notify LMS. At least the following information should be provided by the client

3.1.2.1 Scope and extent of the effect on the client services, business areas and locations, and the status of current activities;

3.1.2.2 Details of any alternative or mitigating actions in place or planned to address the impact;

3.1.2.3 Where relevant, the client justified action plan to address any temporary deviation from accreditation requirements and/or its procedures;

3.1.2.4 Any request to modify the client's scope of accreditation to address the deviation;

3.1.2.5 Where necessary any request to voluntarily suspend part of/all certification

3.2 Where required, LMS will evaluate the proposed actions and seek to review the temporary deviation(s) to confirm maintenance of certification at the earliest opportunity. However, considering the impact that the pandemic may have on LMS's ability to respond promptly, clients can decide to progress with temporary deviations prior to LMS's review where urgency is required. By doing so the client shall acknowledge that should a subsequent LMS review identify deficiencies in the deviations then it may be required to implement corrective actions.

3.3 LMS fully appreciates that clients will have to re-evaluate priorities during this rapidly changing situation; it is important that the ongoing evaluation and decisions that are made are justified and details of deviations are recorded on an ongoing basis.

4. Guidance to certificated clients by LMS

4.1 LMS offering accredited certification for Management system is required to follow the requirements of EIAC Accreditation Services which sets out certification body's obligations when dealing with extraordinary situations such as pandemics. EIAC Accreditation Services for IAF MD 4:2023 Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations, and CBs should take this into consideration when deciding on a strategy for maintaining certification in areas that cannot be accessed.

4.2 In particular, information on the overall size of the problems facing LMS certification activities shall be provided to their EIAC Assessment Manager, with monthly updates of the status of their affected operations.

4.3 With respect to overseas certification activities, where the local accreditation body and/or authorities have issued instructions within their jurisdiction these requirements shall be taken into consideration when reviewing the acceptability of individual CB action plans.

4.4 When an application for initial certification or an extension to scope is received by LMS, LMS shall implement its risk management procedures to determine whether such work can be accepted during this period, and if so how this can be progressed: This shall be clearly documented during the contract review.

4.5 For initial management system certifications, at least part of the Stage 2 audit shall be completed on site, unless LMS can establish that all of the objectives and necessary activities can be robustly completed remotely, taking into account specific scheme requirements: This shall be reviewed by EIAC at the next assessment.

4.6 The certification of products, processes, services or persons would normally require LMS to undertakes elements of the evaluation activity on site (e.g. manufacturing facility, assessment centre, etc): During the current pandemic this may not be possible. In these circumstances LMS shall deploy its risk management procedures in accordance with 3.1 above.

4.7 Not all scheme owners recognise the validity of certification or recertification by remote assessments and therefore it is the responsibility of LMS to determine the acceptability of using remote techniques for recertification purposes for any scheme that it certifies to.

5. LMS certification assessments During the COVID-19 Outbreak

5.1 The restrictions imposed as a result of the outbreak may have serious implications on the provision of accredited services even though the operation of LMS itself is not directly impacted, i.e. although the site may

be open, some external (and in some circumstances internal) services and supplies may not be available. Under such circumstances LMS will need to review the impact that such restrictions may have on its certification service and identify what actions it can take to mitigate the risk associated with these. Any deviations from certification requirements and/or LMS procedures which pose a significant risk to maintaining certification must be notified to EIAC (see 3.1.2).

5.2 Temporary deviations from certification requirements and/or LMS procedures' could include, for example, delay in performing periodic calibration and intermediate checks of the measuring and test equipment, use of alternative supplies that could affect the validity of the conformity assessment activity, third party participation, outsourcing, internal quality control, internal audit and management review.

5.3 It is the responsibility of LMS to ensure that any certification service it continues to provide during this period remains technically valid and fit for its intended purpose. Therefore, for all justified deviations, it will be necessary to identify what alternatives are available and ensure that these meet appropriate requirements, e.g. identifying new suppliers and/or services. Where it is not possible to source appropriate supplies or services then LMS should consider whether there are any alternative mechanisms that can be employed which will ensure the same goal is achieved. In circumstances where no reasonable alternatives can be found then LMS will need to consider disclaiming certification for those services affected; in such instance LMS will as applicable discuss this with its EIAC Assessment Manager.

5.4 It is possible that some site activities undertaken by LMS such as inspections may be successfully achieved through the use of remote techniques. Where LMS wishes to consider this, it shall first undertake a risk evaluation to ensure that the approach being proposed will not impact adversely on the technical validity of the service being provided. Further guidance on this can be found in the publications prepared for certification bodies, i.e. IAF MD4 and EIAC Accreditation Services. Any transition from site to remote activities shall first be discussed and agreed between LMS and EIAC.

6. Guidance on safety during LMS assessments During the COVID-19 Outbreak

6.1 LMS shall implement all measures necessary to protect the health and safety of its staff and assessment teams as well as the staff of the client it certifies. Therefore, it will follow UK/India Government advice on travel restrictions and social contact, be this social distancing, self-isolation, or total lock-down. For overseas assessments LMS shall also follow the advice of the local government of the country where an assessment is due to take place.

6.2 Where the advice restricts or forbids the possibility of undertaking assessments on-site then LMS shall employ alternative mechanisms to ensure the technical validity of the services it accredits is maintained. This shall be achieved through the use of technologies that enable assessments to be conducted remotely, such as telephone or web-based meetings (e.g. Skype, Microsoft Teams, Zoom, etc.), remote (electronic) access to client management systems, remote review of electronically submitted records, etc. For further information on remote assessments see Annex 1.

6.3 The deployment of such techniques will focus on the essential elements to ensure that confidence can be maintained in certification activities and LMS will continue to monitor any necessary follow up activities once any travel restrictions are lifted. The key aim of using a remote assessment in these circumstances is for the LMS assessment team to obtain sufficient evidence to continue to maintain certification.

6.4 It is recognised that the ability of LMS to support remote assessment will vary depending on their capability to share information remotely and/or to partake in remote assessment activity. Their ability to support remote assessment will be established when the LMS assessment team is developing an assessment plan.

6.5 It is strongly recommended that web-conferencing applications between LMS and a client are trialled prior to starting the assessment to ensure that both parties can successfully use the selected platform / application.

In the case that LMS have their own preferred web-conferencing application the client shall be requested to send a test link and LMS will endeavour to access these systems.

6.6 Where, with justification, LMS is unable to accept a remote assessment, either in full or in part, then this situation will need to be discussed with the client Manager to determine an agreed approach. However, if LMS is able to accept a remote assessment (in full or part) but refuses to do so within an acceptable timeframe from its usual profile date, then LMS will need to consider whether a sanction should be imposed.

6.7 LMS will prioritise assessments to support surveillance and re certification activity to enable existing certification to be maintained. Applications for extensions to scope and initial assessments will be progressed using remote assessment techniques where possible, recognising that it may not be possible to complete all aspects of the assessment remotely or by other means, which may delay the grant of certification. Each application will be evaluated, and the customer kept informed of how/whether the assessment can be conducted. Priority will be given to applications that are necessary as a result of the pandemic e.g. COVID19.

6.8 LMS will communicate to agents and auditors the requirements for managing and conducting remote and on-site audits during the course of the pandemic via Briefing Notes, including risk assessment, guidance for auditors and reporting requirements.

7. Expiring LMS Certificates of Registration

7.1 LMS certification is granted for a period of 3 years, with reassessments planned every 3rd visit to automatically renew for a further 3 years subject to demonstration of conformity with the applicable standard(s). All certifications have an expiry date, as detailed with the LMS e-Certificates, which is generally scheduled for 2 months after the due date of the reassessment visit.

7.2 With the changes to the timing and completion of reassessments during the outbreak it is possible that the expiry date of a certificate is reached without the full reassessment being completed and the associated decision made to renew certification.

7.3 LMS has the ability, with justification, to extend the validity of its certification certificates by up to a maximum of 6 months. Where a delay in a client reassessment is due to circumstances outside of clients control then LMS will instigate the extension of the current certificates' validity as appropriate. The decision to extend certificate validity will be reviewed at regular intervals, e.g. every month up to the maximum of 6 months. If a client holds a certificate that has been extended by 6 months and yet has still not completed its reassessment then the certification shall expire, and the client will need to reapply for certification once it is in a position to do so.

Appendix 1: What to expect from an LMS CERTIFICATIONS PVT. LTD. Remote assessment

What is a remote assessment?
A remote assessment is one that is conducted off site either in whole or in part. Remote assessments generally make use of technology, such as Skype, Google Meet, Microsoft Teams or Zoom Meeting, to support the assessment team when a site visit is not possible / appropriate.

The assessment may include everything that is usually covered during a site visit, but it is likely that some activities, particularly our witnessing of staff conducting their technical functions will not be able to be covered. These technical aspects may need to be assessed at a later date, but this will be discussed and agreed during the remote assessment.

What should customers expect?
The structure of the visit will be quite familiar; we will conduct opening and closing meetings and review information with you to ensure ongoing competence although there will clearly be some changes as to how we achieve these reviews. The duration of a remote assessment may differ to that of your on-site assessment, depending on what aspects are planned to be covered. In addition, it is also likely that the assessment may be fragmented with individual activities happening over the course of a longer period. Therefore, you will not necessarily need to be available at all times when the assessment is occurring, but a schedule of planned web-conferencing will be agreed with you.

When assessments are conducted via web-conference technology it is recommended that both parties use screen sharing and web-cam functionality. This reduces the amount of data and information that has to be transferred between your organisation and EIAC. However, it is also likely that the assessors will ask for documentation to be submitted for them to review offline because this is often done more efficiently with large amounts of information. You may be asked to email documents or use file sharing sites to provide the documentation to the Assessor. Please be assured that the information you send us will be securely managed in accordance with our existing confidentiality and data privacy policies.

What do customers need to do to make sure they are ready?

•Remote assessment is heavily reliant on technology, so we recommend taking the following actions to ensure you are ready;

• Check your IT systems will allow to access one of the following web-conferencing solutions Skype, Microsoft Teams, Google Meet, Zoom Meeting, and Confirm with your lead auditor which of these applications works for you. NOTE: You do not need to have a licence for these applications as LMS will initiate the meeting request.

• If you cannot access these applications and wish to use your own web-conferencing solution, contact your Assessment Manager so that LMS can check whether it is accessible to us.

• If online connectivity is not possible, then the assessment will be carried out using telephone conferencing and the emailing/file sharing of documentation;

• As well as checking access please ensure you are familiar with the technology, particularly the management of your audio and screen sharing prior to your assessment to avoid unnecessary delays.

What do customers need to make available for the remote assessment?

Personnel
• Key personnel who normally support the on-site LMS assessment need to be available for web conferences and answering ad-hoc queries from the assessment audit team as the assessment progresses;
• Personnel with specific technical or administrative responsibilities will need to be available for their relevant parts of the assessment;

• Top management and members of the leadership team will need to be available for relevant parts of the assessment as well as the opening and closing meetings.

Documentation

• We will review as much of the management system as possible remotely. This can be done via screen share or by sending the information to your Assessor via email/file sharing;

• Your assessment team may well request documentation to be sent in advance of the assessment so they can review beforehand.

Typical documents your assessment team may request are:

• Internal audit programme and supporting records or reports

• Minutes of management system review

• Reports of complaints and non-conforming work

• Case / Job files (including site operations)

• Training records of new staff

• Details of changes affecting your organisation

• Proficiency testing data (where applicable)

• Quality control data (where applicable)

Witnessing of technical activities

• This is the most challenging part of any remote assessment, but it can be achieved by a mix of live streaming, recordings, post audit reviews or technical interviews;

• For live streaming, check you can live stream visual and have two-way audio at the location the activity is performed. This often requires use of mobile networks or wi-fi so check connectivity at the location;

• For recordings, these need to be agreed with the assessment team in advance. Make sure that the recording is of suitable clarity for both visual and audio. Also, the personnel conducting the activity should narrate what they are doing and why. It is also likely that the technical personnel will need to be available for discussions with the assessor to explain elements of the recording when it is assessed;

• Technical interviews involve an LMS assessor talking through key aspects of the technical activity with a member of your staff who is authorised for that activity. They are used when it is not possible to live stream or record the activity or to conduct a post audit review.

What happens if connectivity fails during the assessment?

The assessment team will try to continue with the assessment wherever possible. If the issues cannot be corrected quickly, then the assessment team will revert to conducting the assessment by telephone conference. LMS Policy on Accreditation and Conformity assessment During the Covid-19 Outbreak

Appendix 2. EA Communication about the impact of the COVID-19 outbreak

Due to the outbreak of the coronavirus disease 2019 (COVID-19) and the imposed travel restrictions established by national governments in the vast majority of countries both conformity assessment and accreditation activities have been affected in different ways. In particular, certification bodies are being forced to cancel or postpone a significant of their "in situ" activities such as on-site assessments, audits, witnessing visits and inspections and they will have to face the situation of only being able to provide their services with a workforce that that is now mostly working remotely. This will affect the service provided and also lead to a possible temporary lack of access to certain supplies or services normally subcontracted by the clients.

Under these circumstances although not all the applicable standards foresee the use of remote assessment techniques, including document reviews, and recognizing that these assessment techniques may not always enable exactly the same objective to be achieved as on-site assessments, LMS suggests the use of these techniques whenever needed to substitute or complement on-site assessments.

Nevertheless EA recognises that, in certain circumstances, LMS will have to take difficult decisions that could include stopping the provision of certain services or temporarily deviating, in order to be able to provide the services, from certain requirements included in the standards or in the accreditation rules.

When facing these situations, LMS will act responsibly, to analyse the risk of providing services with deviations from the requirements and not to provide them if such deviations jeopardize the technical validity of that specific activity and to act with full transparency, informing affected clients of any change in the procedures and keeping records justifying the decisions taken.

As the situation is constantly changing and different countries are establishing different measures to adapt to it, LMS will contact EIAC for further details or questions.

EA will closely follow the development of the coronavirus crisis in order to take any further action when needed and will publish more specific advice and relevant information.

Certification Process Flow Chart for Remote Audit