

CONFLICT HANDLING WITHIN THE ACCREDITATION PROCESS

Background

Conformity assessment bodies (CABs) might seek accreditation for various reasons, e.g.:

- accreditation is a prerequisite for obtaining notification in regulated areas,
- some clients require accreditation to demonstrate the CABs' competence.

During the accreditation assessment the CABs' staff, even if technically very competent, often hesitate to openly discuss any problems or conflicts with assessors. Reasons might be that:

- they are in the role of applicants while the assessors can influence whether accreditation is granted,
- the assessors are usually more familiar with the accreditation requirements and procedures.

CABs often have implemented some procedures which are most suitable for them but are not accepted by the assessors. These arise due to different interpretations of the standard and are generally open to debate. It must be remembered that because it is different to what the assessor thinks, different is not necessarily wrong and the CAB is entitled to discuss the matter with the assessment team. This “Cook Book” paper is intended to give some advice on which measures are available for a CAB to resolve such problems in a constructive way without endangering its accreditation.

Definitions (from ISO/IEC 17011:2017)

appeal

request by a CAB for reconsideration of any adverse accreditation decision related to its desired accreditation status.

complaint

expression of dissatisfaction, other than appeal, by any person or organization, to an accreditation body, relating to the activities of that accreditation body or of an accredited CAB, where a response is expected.

Actions at the national level

If the CAB is not convinced that a requirement of the assessor team is adequate they should request that the assessors specify the normative basis of this requirement and clarify its interpretation. Often it is advisable to jointly read the respective clause of the standard and to consider if alternative approaches preferred by the CAB might also fulfil the intention of the standard. In any case the CAB should not accept a requirement which is inappropriate from its point of view and might have economic consequences without discussing the issue and trying to convince the assessor team. If this fails and the laboratory considers appealing against a non-conformity identified by the assessor team (see below), the laboratory should be careful when signing any agreement concerning this non-conformity.

According to ISO/IEC 17011:2017 all accreditation bodies (ABs) must have established procedures for appeals (clause 7.13) and complaints (clause 7.12). Each accredited or candidate CAB can request information on these procedures. Thus, if a CAB cannot accept a decision of the AB, it can appeal against it. The AB is required:

- to appoint (a) person(s) to investigate the appeal who is (are) competent and independent of the subject of the appeal,
- to advise the CAB of the final decision of the AB,
- to keep records of all appeals,

there is a good chance that a well-founded appeal might be successful. Additionally, the documentation of each appeal allows appeal reviews to be subjected to peer evaluation of the AB. Thus, an AB really needs good arguments for refusing the appeal.

Alternatively, if the CAB is worried about repercussions resulting from an official appeal, it could contact its national EUROLAB organisation. This offers the opportunity to discuss the issue with colleagues who might back up the position of the CAB (or explain why the AB is correct). Eventually the national EUROLAB

organisation could discuss this issue with the AB in general without mentioning any individual CAB. More emphasis might thus be added to the matter in question.

Actions at the European level

If an appeal or complaint was not resolved to the satisfaction of the CAB it might appeal to or complain against the decision of the national AB to EA (European co-operation for accreditation) which also has established respective procedures.. But this step is only allowed if the national AB: -

- has taken an adverse decision or
- has not reacted to the appeal or complaint in due time.

(in other words, the CAB must have addressed the matter with the AB before approaching EA).

Again, if the subject is of general interest, it could be brought to the attention of the European EUROLAB bodies, e.g. to the Technical Committee for Quality Assurance (TC QA). After a discussion of the addressed matter, EUROLAB aisbl might decide to submit this problem e.g. to

- the EA / EUROLAB / EURACHEM Permanent Liaison Group (PLG) or
- the EA Advisory Board (EAAB).

Conclusions

There are several ways to resolve problems which might arise from the assessment of a CAB. Starting from the discussion with the assessor team to an official appeal or complaint at the national or European levels. CABs should not hesitate to take these actions as the peer assessments between ABs and the duty of the AB to document all appeals and complaints protect the CABs from repercussions. Cooperation with other CABs within EUROLAB can be an alternative keeping the anonymity of the CAB concerned.

References

[1] ISO/IEC 17011:2017, General requirements for accreditation bodies accrediting conformity

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