Policy Document for Remote Assessments

Policy document A14/2024

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1 Foreword

The policy document for FINAS was drawn up by a working group appointed by the Advisory Committee for Conformity Assessment Matters, Subcommittee for Accreditation Matters (VANK-P). The new version A10/2024 replaces the previous version A10/2022. In this new version the references are updated.

The purpose of the policy documents is to clarify the application of accreditation requirements in practice. They have been drawn up taking into account the processing of the topic within the international cooperation organisations of accreditation organisations (European co-operation for Accreditation (EA), the International Laboratory Accreditation Cooperation (ILAC), and the International Accreditation Forum (IAF)).

The requirements for accreditation activities are set out in Decision P1. Information on the policy documents and binding guidelines can be found on the FINAS website (www.finas.fi).

2 Introduction

The practices of remote assessments were quickly adopted in March 2020 when the coronavirus pandemic reached Finland. Remote assessments had been applied on a small scale to the assessment of multi-site organisations, but their large-scale use and principles had not been described in detail. International guidelines on remote assessments in certification activities had already been prepared earlier (IAF ID3, IAF ID12 and IAF MD4). At the time of this policy document's publication, the aim was to expand international guidelines and their implementation principles, and they will be published by the international accreditation organisations EA, ILAC and IAF. Experiences of remote assessments obtained during the coronavirus pandemic are used in policy documents in the accreditation community.

Although remote assessments are not considered the primary means of assessment, they may offer an opportunity for increased safety, timing and reachability. FINAS uses remote assessments as one means of conducting assessments.

3 Concepts

Platform

A digital platform is an IT system that helps collect, process, analyse, save

and distribute data produced in various sources. At its largest, a platform is an operating environment for various groups. These types of platforms include Teams and Skype.

Assessment method

Various ways to conduct assessments, including remote assessments, on-site assessments, interviews and operational monitoring.

EA (European co-operation for Accreditation)

A cooperation organisation for national accreditation organisations in Europe.

Remote assessment

In a remote assessment, an accreditation assessment is conducted without being physically present at the site being assessed, and it typically replaces an on-site assessment. Remote assessments include an assessment conducted based on documents, an assessment based on interviews and by monitoring operations using a telephone or real-time stream, and an assessment using a real-time webcam. In addition, ISO/IEC 17011:2017, a requirement standard for accreditation organisations, enables the use of remote assessments as an assessment method. The goal of remote assessments is also to verify the fulfilment of accreditation requirements.

Hybrid assessment

A combination of a remote and on-site assessment.

IAF (International Accreditation Forum Inc.)

An international cooperation organisation for accreditation organisations covering system, product, service and personnel certification.

ILAC (International Laboratory Accreditation Cooperation)

A cooperation organisation for accreditation organisations covering laboratories, inspection bodies, proficiency testing providers and producers of reference materials.

Classified information

As defined in the Government Decree on Security Classification of Documents in Central Government.

Valtori

Government ICT Centre. Valtori provides sector-independent ICT services for central government, as well as information and data communications technology services and integration services that meet the requirements of high preparedness and security.

4 Requirements of the accreditation standard

ISO/IEC 17011:2017, a requirement standard for accreditation organisations, presents remote assessments as an assessment method for conducting an assessment. Other methods include on-site assessments, operational monitoring, the assessment of documents, and interviews.

The same standard requires that the content of a remote assessment must be identical to that of an on-site assessment. This means the assessment must start with an initial meeting to discuss the purpose of the assessment, the requirements on which it is based, its scope, and the assessment plan. Similarly, a remote assessment includes a final meeting, at which the assessment team presents the assessment results and any non-conformities to the assessed operator.

Furthermore, the standard requires that the interval between on-site assessments cannot be longer than two years. However, an accreditation organisation may also use other assessment methods for justified reasons. In general, the standard requires the operator's scope to be assessed based on sampling at least once every two years. A single assessment must be planned and conducted based on risks (policy document A13). All requirements set out in the requirement standard must be covered, and the scope must be comprehensively assessed during the accreditation cycle. The coverage of the assessment during the cycle must be verified in conjunction with a reassessment.

5 Preconditions for conducting a remote assessment

As a rule, a remote assessment is not the primary assessment method, but its significance will increase in the changing world. A remote assessment can also be conducted as a hybrid assessment so that part of the assessment team conducts an on-site assessment, and part is conducted via a remote connection.

FINAS maintains an assessment plan during the accreditation cycle to ensure the coverage of assessments. Any limitations of a remote assessment must be addressed in the assessment plan.

Whether an assessment can be conducted remotely must be considered separately in each case and based on risks. Risks affecting the assessment results must also be addressed in the risk assessment. A risk assessment may also mean a health-based risk assessment during a pandemic, for example. It should be noted that an on-site assessment must be conducted every two years. If this is not possible, other assessment methods must be used, and the reasons for the decision must be given in the assessment report.

However, the same outcome must be reached using other assessment methods.

Before planning and conducting a remote assessment, the preconditions for conducting a remote assessment must be assessed. The preconditions that, if fulfilled, allow an assessment to be conducted remotely, considering the exceptions described, are presented below.

- Sufficient proof of the fulfilment of all accreditation requirements can be obtained via a remote connection. In certain situations, it must be possible to verify facilities or functions on-site. If this is not possible via a remote connection, the assessment must be conducted as an on-site or hybrid assessment. In the following situations, a remote assessment must be critically assessed:

    o A first assessment, in which case the facilities and functions have not been assessed previously

    o An expansion to a new sector, major expansions

    o New facilities or sites

- No more than two years have elapsed from an on-site assessment, or a remote assessment can be justified as a suitable assessment method.

- No factors have been identified during the site's risk assessment to prevent a remote assessment.

- A remote assessment is suitable for all parties. The readiness of the customer and assessors for a remote assessment is identified beforehand by email.

- Activities enable a remote assessment. In the following situations, a remote assessment may be impossible:

    o Sector-specific special requirements may prevent a remote assessment being conducted in its entirety, in addition to which certain assessment programmes (certification scheme) may present specific limitations.

    o A remote assessment and the internet and camera connections required for it may be unsuitable at certain sites, i.e. explosive atmospheres, nuclear power plants, areas requiring a specific level of hygiene, forensic testing, hospitals, aviation, defence forces.

    o If the assessed site requires sensory observations (e.g. smell

and touch).

- The material required in the assessment (e.g. management system and quality assurance documentation) is available in electronic format.

6 Information security during a remote assessment

Before deciding to conduct a remote assessment, information security and its impact on confidentiality must be addressed. As unauthorised persons may have access to the material provided through the tools used in a remote assessment, special attention must be paid to the selection of tools. More information about confidentiality is available in FINAS Leaflet 2 – FINAS Finnish Accreditation Service principles of confidential conduct. Various factors that ensure that all parties concerned are aware of the situation, and that information remains confidential, are presented below.

- Information security and the functioning of the internet have been ensured. Information security can be maintained during the remote assessment.

- A platform which Valtori considers safe is used in the remote assessment. The site being assessed may have stricter security regulations, which must be followed.

- The site being assessed is requested to give its consent to the platform to be used.

- The site being assessed may also propose a solution or platform to be used in the remote assessment to ensure that a sufficient level of information security can be maintained when presenting material via a remote connection.

- Information in class II, III or IV is not presented or saved during the remote assessment.

- No confidential material is saved in Teams.

- It is ensured that no confidential or classified information or a person who should not be videoed is shown in video recordings.

- If it is determined that not everything can be processed securely via a remote connection, the assessment must be conducted at least as a hybrid assessment. The following must not be presented in Teams or on similar meeting platforms:

  o personal identity codes;

     o   special categories of personal data (e.g. health records);

     o   personal data about individuals in a vulnerable position (e.g. children); or

     o   large volumes of individual personal data (personal data covers all data related to an identified or identifiable individual).

7   Planning a remote assessment

This section describes what needs to be taken into account in planning a remote assessment. The assessment planning phase and the importance of preparation are emphasised in a remote assessment. The assessment programme must be sufficiently detailed and allow flexibility in the allocation of time. As a remote assessment typically involves static work, breaks are more important than in an on-site assessment.

Material requests sent by FINAS for an assessment are similar in on-site and remote assessments. The advance material provided by the site being assessed must be used in planning the assessment content.

The following must be addressed with the site being assessed in the planning of the assessment:

- The platform to be used must be agreed. The functioning of the systems to be used in the remote assessment must be ensured beforehand if required: the functioning of connections and the presentation of material.

- What should be videoed during the remote assessment must be indicated beforehand, and any photography and videoing permits must be ensured.

- The presented or videoed functions required for the assessment of activities must be videoed, and preparations must be made using photographs, videos or documents.

- The information required for the remote assessment must be requested.

When planning the remote assessment, the aim is for the assessment to be conducted as easily and predicably as possible. The assessment programme must indicate the targeting of the assessment and the experts or individuals to be interviewed during the assessment if required. The programme should include the telephone numbers of the contact people who can be contacted in the event of any problems. The following must also be addressed in the

planning of the assessment:

- The data systems required should be identified and indicated before-hand so that they are running and available for an assessment as in an on-site assessment.

- A sufficient number of meeting links or calendar invitations must be created.

- It must be ensured that no unauthorised information is presented in Teams or on similar meeting platforms, as presented in more detail in Section 6.

A FINAS trainee or evaluator can participate in the remote assessment similarly to an on-site assessment.

8 Practical implementation of a remote assessment

This section describes the practical implementation of a remote assessment. The transfer of data related to assessments must comply with FINAS Leaflet 2 – FINAS Finnish Accreditation Service principles of confidential conduct.

- Regarding the programme, the practical implementation of a remote assessment is based largely on an on-site assessment.

- Meeting practices (the use of cameras and microphones, distributing and requesting the right to speak, sending files, not to use the chat window for conducting the assessment) and confidentiality principles must be discussed at the initial meeting. It must be ensured that the participants have links to remote assessments covering their own areas. Matters related to information security should also be discussed (e.g. not recording the assessment, and the material displayed being the responsibility of the site being assessed).

- It is recommended that the camera be turned on to see the persons being talked to and to make observations based on body language.

- During the day, the lead assessor will maintain contact with the members of the assessment team as in an on-site assessment. Communication between the members of the assessment team during the day can be arranged by holding separate meetings or creating a separate team.

- Each member of the assessment team can prepare for the smooth flow of the process by using two computer screens, for example: using one

screen to monitor the camera display and another screen to monitor and make notes.

- The registration, processing and approval procedure for non-conformities follows the same principle as in an on-site assessment.

- A remote assessment may need to be interrupted and postponed if there are insuperable technical problems, and the fulfilment of the accreditation requirements cannot be ensured.

9 Experiences and practical examples of remote assessments

This section describes FINAS's experiences and practical examples of remote assessments.

A remote assessment may be necessary for the management system and technical assessment when assessing inspection activities. A remote assessment can be applied to office assessments during initial and periodic surveillance assessments, especially if the technical assessor carries out on-site field monitoring for technical activities. Such a hybrid assessment is particularly suitable for activities in which there are no technical activities in the operator's facilities.

In some special cases, a remote assessment can also be conducted in conjunction with a field assessment. Remote assessments have been used to assess the sampling process for water samples. In this case, the assessment has been arranged so that the site being assessed appointed another person in addition to the sampling employee to video the sampling process. Samples were taken in the field, and it was stated in practice that it was useful to prepare for a remote assessment by carrying extra batteries, and to ensure high-quality audio, the person videoing the event should be fairly close to the person being videoed. The functioning of connections was ensured beforehand, and preparations were also made to record the video if connections were insufficient.

In some cases, due to the customer's limited IT systems or safety and security reasons, the ability to share materials, including notes and results, has been limited. Such an assessment has been carried out as a hybrid assessment. Another way to conduct a remote assessment while maintaining a high level of information security is to use the secure network (TUVE). TUVE is a government network available to certain government user groups.

10 References

EA 2/21 G:2022 Guidance on remote assessments

IAF ID 3:2011 Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

IAF ID 12:2023 Principles on Remote Assessment

IAF MD4:2023 IAF Mandatory Document for the Use of Information and Communication Technology (ICT) for Auditing/Assessment Purposes

Changes to the previous version

Changes 01.03.2024

	Chapter	**Change**
10	References	Updated references