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Continuation of exceptional measures relating to Covid 19 in the SCL Scheme

In March NEN [published](#) the exceptional measures relating to COVID 19 in NEN schemes with a maximum validity of six months. As a result of the continuing measures of governments and organizations to prevent the spread of the coronavirus COVID 19, not all conformity assessment activities can still always go ahead as planned. This is why the extended measures are being announced here.

IAF policy

For the SCL scheme NEN uses the IAF rules (ID3:2011) as a basic principle for the extended measures. The IAF has published a number of '*questions and answers on postponed validity*' on its [website](#), which discuss measures in the context of COVID 19.

NEN policy

Because the original exceptional rule applied for a maximum of six months and the first extension of six months has now expired, it is important to determine the extended measures. NEN follows the line of the IAF with respect to extensions, as described for example in [Q31 and Q32](#). This is the basis for the following revised exceptional rule.

Audits

The general principle is that an attempt shall be made to conduct the conformity assessments as far as possible remotely or with adapted measures, ensuring both the safety of those involved and the efficacy of the conformity assessment.

This means that what adjustments to the conformity assessment activities are acceptable with a view to the efficacy of the assessment and what activities cannot be postponed, even in a revised form, shall be determined based on a risk analysis.

Revised forms of conformity assessment that are permitted with a view to the COVID 19 measures are in principle of a temporary nature and do not create a precedent. Upon lifting or easing of the measures these are also no longer permitted, unless otherwise decided.

Postponement

If the performance of a full recertification audit really is not possible, postponement for a maximum of 12 months from the original expiry date is possible (that is including any previously granted 6 months postponement based on the above rule). If no full recertification audit has taken place before the expiry of the 12 months, the scope of the certificate is partly limited or the certificate is fully withdrawn and a new initial audit is required.

Q32 gives further guidance regarding surveillance audits:

In view of the permitted postponement of conformity assessment activities:

- it is not necessary to conduct a surveillance audit at least once a calendar year;
- the date of the first surveillance audit following initial certification shall not be more than 12 months from the certification decision date plus the postponement allowed by the IAF FAQ Q10 (that is 12 + 6 months).

If it is not possible to perform assessment activities within the timeframe of 12 + 6 months (see above second bullet point), the CB shall inform the customer and suspend the certificate.

In these specific circumstances the suspension cannot exceed six months (see the note on subclause 9.6.5.4 in ISO/IEC 17021-1:20150)

Lifting suspension of SCL certificate

In order to lift the suspension and go back to a valid certificate, an assessment shall be performed in accordance with the arrangements for the specific SCL product. Example: for an SCL, if the assessment activities of year 2 could not take place in the cycle, a 40 % audit shall be performed to lift the suspension.

Alternative audit methods

General arrangements for remote assessments

Remote assessment (remote auditing) is only permitted temporarily, as long as this rule is in force and if there really is no other option. The following arrangements apply for this:

For carrying out remote assessments the requirements from [IAF MD 4:2018](#) apply with the following (additional) requirements:

- The institution or company where the remote assessment is performed must agree to this beforehand and there shall be agreement about the way in which the assessment is performed;
- NEN is informed of the intention of a CB to perform remote assessments for a particular scheme;
- The remote assessments shall as far as possible be performed in accordance with the original audit programme;
- Observations of locations and/or (behaviour of) operational staff/activities cannot be carried out remotely;
- Interviews of functions where (behaviour) observation does not apply, for example “office functions” such as management, HR, costing etc. can be carried out remotely.
- The interview is conducted via a secure link, such as MS Teams or Skype, where there is an audio and video link, so that the auditor(s) and the auditee can see and hear one another properly as regards verbal and non-verbal communication.
- The CB keeps a full record of actions and deviations from the established certification programme, together with the justification for decisions on action taken. For schemes not monitored by the Dutch Accreditation Board (RvA), these data are submitted to NEN for inspection on request.

Additional arrangements and notes for the SCL

- Remote audits are not permitted:
 - For initial audits.

- For observations that you make on the way to the audit, while moving around during the audits and so on and for work and/or project visits.
- Remote audits are permitted during ‘surveillance audits’ and for ‘recertification’, also in case of scope extensions or audits to assess a higher level than previously achieved. This only relates to interviewing “office functions” such as management, HR, costing etc.
- For carrying out remote audits the following conditions apply:
 - The remote audit is only performed because of measures taken in relation to Corona.
 - As soon as the measures relating to Corona are lifted, remote audits are no longer permitted.
 - The remote audit is carried out by means of a web meeting where there is an audio and video link so that the audit team and the employee can see and hear one another properly as regards verbal and non-verbal communication.
 - The audit team should preferably sit together in 1 room so that they are able to consult one another separately to share and agree with one another with regard to the audit. If the auditors cannot sit together in 1 room due to circumstances caused by Covid-19, separate consultation between the auditors may also take place by means of a separate “video conference”.
 - The CB states in the audit planning whether remote auditing will be used.
If this is the case, the audit planning will indicate:
 - Which part of the audit is performed remotely.
 - How this will be carried out.
 - How the auditors are given the opportunity to consult each other separately.