



01 March 2024

CAB OVERSIGHT MANUAL v1.1



SUSTAINABLE FIBRE ALLIANCE


Introduction

This requirements in this document apply to the oversight body (OB), which is the organisation performing oversight of conformity assessment bodies providing assurance and certification services for a Standard within the scope of the SFA program, as defined in the [SFA Assurance and Certification Manual](#).

The OB shall follow the requirements of this document from its publication date.

In this document, the following terms are used to indicate requirements, recommendations, permissions, and possibilities or capabilities:

- “shall” indicates a requirement;
- “should” indicates a recommendation;
- “may” indicates a permission; and
- “can” indicates a possibility or a capability.

 *Indicates guidance. Guidance is not normative in and of itself, but may repeat, reinforce and/or clarify normative requirements.*

References

SFA program documents

- [SFA Assurance and Certification Manual](#)
- [SFA Cashmere Standard](#)
- [SFA Clean Fibre Processing Standard](#)
- [SFA Chain of Custody Guidelines](#)
- [SFA Glossary](#)

SFA web links

- [Conformity assessment bodies \(CABs\) approved to certify against the SFA Standards](#)
- [Conflict of Interest Policy](#)

Amendment record

Page No.	Context	Revision	Date

Review of this document

Concerns or comments on the design and/or implementation of this document or any other part of the SFA program more broadly should be sent to standards@sustainablefibre.org. All concerns will be considered carefully, no later than when formal review of this document starts within three years of the previous major version being published.

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General requirements

1. Service level standards

- 1.1. The Oversight Body (OB) shall promptly carry out, in a competent and professional manner, all their activities related to the SFA program.
- 1.2. OBs shall comply with the legal requirements of the countries in which they operate.
- 1.3. The OB shall promptly inform the SFA of any information received which is likely to impact the credibility of the SFA program.
- 1.4. The OB shall promptly inform the SFA of any information received which is likely to impact the credibility of the SFA program.
- 1.5. The OB shall not engage in any activity that might bring the SFA into disrepute.
- 1.6. The OB shall not disclose to any other party, without written consent from the SFA, information obtained in the course of the OB's work for the SFA, and will follow all appropriate privacy and data protection requirements as set out by applicable law or by the SFA.
- 1.7. The OB shall contribute to scheduled standard reviews by providing the SFA with feedback on the SFA program as it relates to the OBs activities related to the SFA program.
- 1.8. The OB shall have adequate arrangements (e.g., insurance or reserves) to cover liabilities arising from its operations and shall have the financial stability and resources required for its operations.
- 1.9. The OB shall be a legal entity.
- 1.10. The OB shall use English as its working language and ensure all information shared with the SFA is in English.

 *This means that original documents and communications with the SFA shall be in English.*

- 1.10.1. Audits may be done in the working language of the CAB, but the CAB Oversight Report shall be in English.
- 1.11. The OB shall not provide any other products or services which could compromise the confidentiality, objectivity or impartiality of its audit process and decisions. In case the OB also performs other activities in addition to (re)approval, it shall apply additional measures to ensure that the confidentiality, objectivity, and impartiality of its (re)approvals are not affected by these other activities.
- 1.12. The OB shall not produce or supply products of the type it certifies or approves.
- 1.13. The OB shall not give advice or provide consultancy services to the CAB as to methods of dealing with matters which are barriers (e.g., non-conformances identified during the certification process) to SFA certification.

 *Explanations regarding the SFA standard(s) and its assurance or certification system are not considered to be advice or consultancy. General information or training may be given if this service is offered to all standard users in a non-discriminatory manner.*

1.14. The OB shall demonstrate that it seeks and achieves continuous quality improvement

1.15. The OB shall treat all people and cultures with equal respect and dignity.

The OB should take special care in this regard when operating in a country foreign to the one in which they are based.

1.16. The OB shall provide the SFA with access to all documentation related to CAB oversight and data when requested and in a timely manner.

1.17. The OB shall direct all correspondence with the SFA to standards@sustainablefibre.org.

Where the OB is corresponding with individual SFA staff via email the CAB should put standards@sustainablefibre.org in carbon copy (cc).

2. OB availability and accessibility

2.1. The OB shall ensure that their main contact email address for SFA related queries is not left unattended for more than 48 hours.

2.2. OBs shall provide the SFA with access to all assurance and certification related documentation and data when requested and in a timely manner.

2.3. The OB shall direct all correspondence with the SFA to standards@sustainablefibre.org.

Where the OB is corresponding with individual SFA staff via email the OB should put standards@sustainablefibre.org in carbon copy (cc).

3. Responding to standard system updates

3.1. Where the SFA makes changes to SFA program documents the OB shall:

- a. update the OB's procedures and documents to reflect the changes;
- b. notify the CAB of the nature of the changes and how they will affect the CAB;
- c. notify the CAB of when the changes come into effect.

Such changes may include requirements will be withdrawn, replaced, or updated.

Where there are significant changes the SFA will provide guidance and training materials explaining the changes.

Management System

4. Quality Management System

4.1. The OB shall have a quality management system that includes documented procedures for:

- a. Document Control;
- b. Meeting the requirements of this document;
- c. The recruitment, selection, training, and assignment of the OB's personnel responsible for CAB oversight;
- d. Conducting CAB oversight including assigning suitably qualified auditors;
- e. Any interested stakeholder to make a complaint about any aspect of the conduct of the OB or their representatives. This procedure shall function independently of and shall not undermine the scope of application of the SFA's Complaints and Dispute Resolution Procedure;

Where a complaint cannot be resolved outside of a formal process, the OB or CAB may submit a formal complaint to the SFA in relation to the SFA's standards, policies and procedures, members, or activities.

Formal complaints shall be made in writing following the SFA's Complaints and Dispute resolution Procedure.

- f. reviewing the performance of their quality management system;
 - g. annual performance reviews of personnel responsible for CAB oversight;
 - h. the management of liability;
 - i. identifying, analysing, documenting, and preventing and minimising conflicts of interest from the OB's provision of CAB oversight, including any conflicts arising from the OB's relationships with its CABs.
 - j. Meeting the legal and regulatory requirements for the jurisdictions in which they operate.
- 4.2. The OB shall ensure that the quality management system is understood, implemented, maintained, and reviewed at all levels within the organisation for the delivery of the SFA requirements.

CAB approval

5. Conformity Assessment Body (CAB) approval

- 5.1. The OB shall not provide CAB oversight activities for the scope of the SFA certification program without:
- a. approval from the SFA as evidenced by an agreement signed by the OB and the SFA;
 - b. payment of any fees due to the SFA as per the [SFA Fee Schedule](#);

Payment of the fee does not guarantee (re)approval.

- c. The CAB paying the applicable fee(s) within 30 calendar days of receipt of an invoice;
- d. The CAB entering into a contractually binding agreement with the OB that covers as many parts within the scope of the SFA certification program for which a CAB wishes to provide assurance and certification services, provided the CAB has demonstrated compliance with the requirements of the [Assurance and Certification manual](#).


The OB assesses this requirement through an application form, which may be followed up with a telephone/video meeting with the CAB.


The agreement may cover approval for as many of the parts within the scope of the SFA certification program for which the CAB wishes to provide assurance and certification services, but the CAB must demonstrate compliance with this requirement for each part of the scope selected.

Approval may be granted globally, for a specific list of countries, or for another defined geographic region.


- 5.2. The OB shall not (re)approve a CAB to deliver certification and assurance services for any of the Standards (as defined in the SFA Assurance Manual) without:
- a. the address of the CAB's Head Office;
 - b. the addresses of any other sites operated by the CAB;

- c. The name and contact details of the person ultimately responsible for the CAB's compliance with the SFA's requirements;
 - d. the name and contact details of the CAB's nominated SFA Program Manager;
 - e. Proof of the CAB's compliance with the requirements of the SFA's [Assurance and Certification Manual](#).
- 5.3. The CAB shall submit to oversight by the OB to ensure the CAB's continued compliance with 5.2 by way of an annual audit.

 *The OB may conduct this activity in person or remotely.*

 *This review must be completed within 12 months of the original agreement or last review.*

- 5.4. The CAB shall act with full transparency in assisting in the delivery of 5.2 and 5.3.

 *This may include allowing the OB to assess internal processes and witness representative activities (including of assessment and certification processes)*

- 5.5. The CAB shall sign and return the CAB agreement within 14 days of approval being granted.
- 5.6. A CAB that successfully achieves SFA approval may use the 'SFA-approved' logo on their website and in promotional material.
- 5.7. An approved CAB shall not use accompanying text to promote their partnership with the SFA without prior approval from the SFA.

 *Contact the SFA via standards@sustainablefibre.org for approval of any accompanying text.*

6. Defining the scope of approval

- 6.1. The OB shall agree with the CAB the scope of the SFA Standards against which the CAB is seeking approval.

CAB oversight Body Personnel

7. OB Personnel

- 7.1. The OB shall appoint an SFA Program Manager who is responsible for communications between the OB and the SFA, with responsibilities to include:
- a. Managing SFA CAB approvals;
 - b. Supervising CAB oversight;
 - c. Assigning CAB oversight personnel to CABs.
- 7.2. The OB shall employ sufficient personnel competent to perform CAB oversight functions related to SFA standards and operate its system in a timely fashion.
- 7.3. The OB shall ensure that individual personnel have knowledge, training and/or experience relevant to their role within the CAB oversight of SFA standards, that is:
- a. sufficient, and;
 - b. current, and;
 - c. relevant to the scope of the respective SFA standards.
- 7.4. The OB shall require personnel involved in the CAB approval process to:
- a. Commit themselves to observing the policies and procedures of the OB;

- b. Declare any prior or present association with a CAB seeking (re)approval or, any of the entities that have been assessed by the CAB within the last five years, to which they are to be assigned to perform CAB oversight procedures.
- 7.5. The OB shall ensure that personnel involved in CAB oversight have up-to-date technical knowledge in their respective fields of activity to enable them to conduct CAB oversight effectively and uniformly.
- 7.5.1. In particular, the OB shall annually review the competence of its personnel considering their performance to identify training, including:
- i. That all CAB oversight personnel shall have knowledge and experience of conducting conformity assessment activities;
 - ii. That new personnel receive training of CAB oversight activities and undergo an approval period while under the supervision of experienced CAB oversight personnel;
 - iii. That all approval or CAB oversight decisions of personnel are countersigned by experienced CAB oversight personnel until they have successfully completed their approval period;
 - iv. That CAB oversight decision making personnel have sufficient knowledge, training and/or experience to make an informed decision on the outcome of an CAB oversight activity;
 - v. Provide training on CAB oversight processes, methodologies, and activities.

Conducting CAB oversight

8. Contracting with CAB

- 8.1. As part of contracting the OB shall inform the CAB about:
- a. Their contractual conditions, including fees and possible contractual penalties;
 - b. The CAB's rights and duties, including the right to appeal with reference to the OB's appeals procedure;
 - c. The current version of [SFA Assurance and Certification Manual](#) and corresponding relevant documents released by the SFA;
 - d. Program changes, including regular updates of procedures and standards;
 - e. The procedures applied by the OB during CAB oversight.
- 8.2. The OB shall have an CAB oversight agreement with the CAB that shall specify the terms of the contract including:
- a. that the SFA has the right to change the Standard(s) and/or process of assurance and certification at their discretion; and
 - b. a commitment on the part of the CAB to comply with the requirements of the [SFA Assurance and Certification Manual](#) and other provisions of the SFA standard(s) as provided by the SFA;
 - c. a commitment on the part of the CAB to allow the OB and the SFA access to all sites covered by the scope, and to all relevant documentation, records, and staff;


- d. a commitment on the part of the CAB that in the event of suspension or removal of approval, the CAB discontinues its use of all advertising matter that contains any reference to the SFA;
- e. a commitment on the part of the CAB to keep records of all complaints received related to compliance with SFA standards and makes these records available to the OB and/or the SFA on request, to take appropriate action about such complaints and any related deviations to the certification requirements found and to document the actions taken;
- f. a commitment on the part of the CAB to inform the OB, without delay, of any information or changes that may affect its ability to confirm with the SFA's assurance and certification requirements;
- g. a data sharing agreement that allows the OB to exchange information with other approved OBs, National Accreditation Bodies and the SFA as related to the SFA program.

9. Conditions for on-site and remote assessments

9.1. The OB shall carry out audits on-site.

9.1.1. Where it is not possible to conduct an audit on-site, the OB may do the audit remotely provided the following:

- a. The OB can justify why the remote audit is needed;

 *This could be due to official publication of travel restriction due to a pandemic.*

- b. The OB gains written confirmation that the CAB agrees to a remote assessment and the proposed methods for conducting it;
- c. the appropriate technology is available to share required documentation and connect the OB staff directly with the CAB's staff;
- d. full confidentiality, security and data protection is ensured for all data shared during the audit;
- e. an on-site audit will be done as soon as it is possible.

9.2. The remote audit can be partial or full.

10. Time and place of assessment(s)

10.1. The OB shall audit the CAB for conformity against the SFA [Assurance and Certification Manual](#) every three years.

10.2. Where the OB or the SFA is made aware of a credible complaint against an CAB or information in the public domain that threatens the integrity of the SFA's Standard System, the OB shall conduct an audit as part of its investigations.

10.2.1. The audit shall take place at the time the credible complaint or threat is identified, even if this is part way through the CAB's three-year approval period.

10.2.2. The audit shall cover all requirements related to the nature of the credible complaint.

11. Communication with the CAB ahead of audit

11.1. The OB shall provide the following information in writing to the CAB ahead of the audit:


- a. The requirements of the SFA's [Assurance and Certification manual](#);
- b. The date of the audit;

- c. Name of the Auditor(s);
- d. The site(s) of the audit;
- e. Who needs to be available for the audit and their role;
- f. What will be covered during the audit – opening/closing meetings, site tour, etc.;
- g. Length of audit;
- h. How evidence shall be recorded & data protection;
- i. Grievance and complaints process for both the OB and the SFA.

12. Sampling of certifications

12.1. The OB shall audit 10% of certification decisions made by the CAB in the time since their last OB audit.


12.2. The OB shall select the sample at random.

 *At random means that every certification decision has an equal chance of being sampled within the OB's strata.*

13. Sampling of claims


13.1. The OB shall audit 10% of claims approved by the CAB in the time since their last OB audit.

13.2. The OB shall select the sample at random.

 *At random means that every approved claim has an equal chance of being sampled within the OB's strata.*

14. Sampling of licensing agreements

14.1. During audits the OB shall audit a random sample of at least 10% of the licensing agreements made by the CAB since their last OB audit.

 *The OB does not need to audit all licensing agreements.*

14.2. Where a sampled licensing agreement has been issued incorrectly, the OB shall audit all licensing agreements.

15. CAB oversight activity

15.1. The OB shall apply the requirements of the SFA [Assurance and Certification Manual](#) without any limitations and without any additions or reductions.

15.2. The OB shall apply the requirements of the SFA [Assurance and Certification Manual](#) to the CAB as a whole including any subcontractors acting on behalf of the CAB.

15.3. The OB shall only approve or reapprove CABs that comply with all the requirements of the SFA [Assurance and Certification Manual](#), after any non-conformances recorded during the audit have been closed.

16. Conducting the CAB oversight audit

16.1. The auditor shall conduct direct observation and questioning of the policies, systems, procedures, and processes relevant to the elements of the scope being audited.

16.2. The auditor shall verify documented evidence.

16.3. The auditor shall conduct interviews with concerned/authorised employees and management.

16.4. The auditor shall collect and examine all evidence that relates to the requirements of the SFA [Assurance and Certification Manual](#).

Types of evidence include but are not limited to work product, formal questioning, witness testimony, photographs, and videos.

16.5. The auditor shall submit a documented report to the OB on the audit findings within the 30 calendar days following the audit taking place.

16.6. The auditor shall provide a copy of the audit report to the CAB audited within the 30 calendar days following the audit taking place.

16.7. Where an auditor is joined during an audit by anyone not part of the audit team, the names and affiliations of those people shall be recorded in the audit report(s).

The auditor and the OB shall ensure those people take no part in the recommendation or decision making of the approval.

17. Approval decisions

17.1. The OB shall not issue approval to any CAB that does not demonstrate conformity through full assessment against the requirements of the SFA [Assurance and Certification Manual](#) for the scope being audited.

The OB has full and sole responsibility for granting, maintaining, extending, suspending and removing approval.

17.2. The OB shall make approval decisions within 60 calendar days of the audit taking place.

17.3. The OB shall ensure that documentation of approval decisions includes:

- a. the basis for the decisions;
- b. the decision;
- c. consequences.

17.4. For decisions where approval is issued, the OB shall issue official approval documents to the approved CAB within 90-calendar days of the audit taking place.

17.5. Following an approval decision, the OB shall notify the CAB and the SFA of the decision in writing.

17.6. The OB shall ensure that validity period of the approval certificate must not exceed 36-months from the date of issue.

Incentivising Improvement

18. Non-conformance classifications

18.1. Where a CAB does not meet a requirement of the SFA [Assurance and Certification Manual](#) for the scope against which the CAB is being audited, the OB shall issue a non-conformance to the CAB.

18.1.1. Non-conformances can be critical, major or minor.

18.2. Where a CAB has met a requirement of the SFA [Assurance and Certification Manual](#) for the scope against which the CAB is being audited, but attention is needed to prevent a lapse of either performance, discipline or control which could/would lead to a non-conformance in the future, the OB may offer guidance to the CAB on this matter.


The OB may also offer guidance on how the CAB could exceed the requirements of the SFA [Assurance and Certification Manual](#).

19. Conditional conformance

19.1. Where major non-conformances are determined by the OB the OB shall take the appropriate action.

19.1.1. Appropriate action shall include one or more of the following:


- a. Continuation of approval under conditions specified by the OB;
- b. Reduction in the scope of approval to remove non-conforming SFA standard components.

 *This supersedes 19.1.1*

20. Suspension of approval

20.1. The OB shall deny or suspend the approval of a CAB when:

- a. a Critical Breach is identified during audit;

 *The OB shall immediately notify the SFA of all critical breaches and major non-conformances, including details of the non-conformance.*

- b. It is not fulfilling clauses of the contractual agreement with the OB;
- c. before or at any point during an investigation or audit if there is enough evidence of a potential systemic non-conformance.


20.2. The OB shall enact the suspension within a maximum of five business days from the day the critical breach was identified, even if the entire assessment has not yet been completed.

20.3. The suspension will last up to a maximum of 120 calendar days.


20.4. In case of major non-conformances, the OB shall withhold or suspend certification until implementation of corrective actions have been demonstrated.

21. Removal of approval

21.1. The OB shall deny or remove the approval of a CAB:

 *The SFA reserves the right to request the OB to suspend or cancel approval, when a case involving one or more critical breaches has been proven in a court, or when a case can potentially cause significant harm to the reputation of the SFA.*

- a. Where critical breaches have not been rectified within the agreed timescale;

 *In cases where reasons for denial or removal of approval include critical breaches, the OB shall immediately notify the SFA with details of the CAB's breach.*

- b. If a suspension is not lifted within the time allocated by the OB;
- c. When the CAB rejects an unannounced audit without a reason that is out of their control;
- d. Where the CAB does not fulfil clauses of the contract with the OB leading to cancellation of the contractual agreement;
- e. When the reapproval audit was not carried out while the preceding approval was still valid;
- f. When the CAB voluntarily requests the cancellation of its approval.

21.1.1. The OB shall investigate and determine the reason(s) for voluntary cancellation by the CAB within 90-calendar days.

In the case that approval is suspended or removed, the SFA and OB will work with the CAB to minimise the impact on certified organisations while maintaining the credibility of the system.

21.2. The OB may conduct a reapproval audit to reinstate approval that was removed subject to the CAB's application and status.

CABs whose approval was removed after an audit and who wish to renew the approval, may apply for a reapproval at any time.

CABs who voluntarily requested the cancellation of their approval and who wish to renew the approval may apply for a reassessment at any time.

21.3. Where certification has been removed, the OB shall not process an CAB's application for reapproval for at least:

- a. Three years if the CAB exerted coercion or made any form of implicit or explicit threats to the moral or physical integrity or the life of any members of the OB audit team or staff, through the employees of the CAB, or people under its influence or orders;

There should be evidence of coercion or threats in the form of a witness report, a written report on the outcomes of an investigation or police report where a crime was reported.

- b. Three years if the CAB participated in illegal, fraudulent, or unethical activities that could discredit the SFA's certification program.

CABs that have had approval removed and wish to rejoin the certification program will have to reapply and declare as part of their application any sites included in the application that have been included in any previous certificates.

Reporting

22. Reporting requirements

22.1. The OB shall produce an annual report for the SFA that includes:

- a. a list assessment/certification decisions sampled;
- b. a list of the total number of claims sampled;
- c. a list of the total number of licensing agreements sampled;
- d. results of any internal audits related to the performance of SFA standards;
- e. Any conflicts of interest identified and actions taken in response;
- f. any changes to the OB's personnel.

Examples could include, but are not limited to, if the SFA Program Manager is replaced, the main SFA contact changes, or if legal proceedings or disciplinary proceedings are enacted against the OB.

22.2. The OB shall report all data related to an approval decision to the SFA within a 30 calendar days of the decision being made.

22.3. The OB shall report the suspension or removal of approval or sites from any approval to the SFA within 10 working days.

22.4. The OB shall inform the SFA of any changes to personnel responsible for delivering CAB oversight relating to SFA Standards within 10 working days.

Record Keeping

23. Record Keeping requirements

- 23.1. The OB shall maintain an up-to-date system of records to demonstrate how each the requirements of this document have been met.
- 23.2. The OB shall maintain full records related to contracting and CAB oversight for each of their CABs.
- 23.3. The OB shall maintain records on appeals, complaints and actions taken in response to appeals and complaints.
- 23.4. The OB shall maintain up-to-date records on personnel including auditors used. The records shall include:
 - a. Name, address, and contact details;
 - b. position held;
 - c. educational qualifications and professional status;
 - d. experience and training;
 - e. the assessment of competence within the scope of the relevant SFA standard(s);
 - f. periodic performance review;
 - g. authorisations to conduct audits and/or make approval decisions;
 - h. date of most recent updating of each record.
- 23.5. The OB shall ensure that records are kept, managed and disposed of in such that the integrity of the process and the confidentiality of the information and maintained.
- 23.6. The OB shall retain individual records for at least five years, or as required by law within the jurisdictions that the OB operates.
- 23.7. The OB shall make all records and documentation relating to the delivery and implementation of SFA standards available to the SFA upon request, within any restrictions outlined by law within the jurisdictions that the OB operates.



SUSTAINABLE FIBRE ALLIANCE

Creating a Sustainable Cashmere Value Chain

Contact: standards@sustainablefibre.org

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