SUSTAINABLE FIBRE ALLIANCE

Remote Auditing Policy

Approvals

The signatures below certify that this Policy has been reviewed, approved and demonstrates that the signatories are aware of all the requirements contained herein and are committed to upholding them.

	Name	Signature	Position	Date
Prepared by	Lesley Colvin		Standards and Compliance Manager	29/04/2022
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Approved by	Una Jones		Chief Executive	04/05/2022

Amendment Record

This Policy is reviewed annually to ensure its continuing relevance to the systems and processes that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date

CONTENT

1. NORMATIVE REFERENCES

The following referenced documents are to be used in conjunction with this interim policy as binding requirements wherever applicable. It is understood that any updated versions of the below documents, officially published by the relevant body will replace these references, and CABs shall conform in accordance with the timeline established by the relevant body. References to individual requirements within these documents refer to the version noted in this section.

Standard	Title
ISEAL	Remote Auditing Good Practices Guidance
ISO/IEC 19011	Guidelines for auditing management systems
ISO 9001	Auditing Practices Group 2020 Guidance on REMOTE AUDITS
IAF	IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations; Issue 1; (IAF ID 3: 2011)
	CABs are also directed to review the ISO and IAF Guidance on Remote Auditing

2. TERMS AND DEFINITIONS

The following terms and definitions are used throughout this document.

SFA	The Sustainable Fibre Alliance, owner of the Codes of Practice, Standards and Conformity Assessment Scheme.
Applicant	Producer, Processor or Group applying to a Conformity Assessment Body for assessment of their products/processes to SFA standards and criteria.
Assessment	Systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which the requirements are being met, and where appropriate offer support for continuous improvement. Interchangeable for these purposes with 'audit'.
Conformity Assessment Body (CAB)	Organisation performing professional and objective assurance of producers and processors operating the certification systems applying for initial or continued approval as CAB
Certification	The provision by an independent conformity assessment body of written assurance (Certificate of Conformity or a scope certificate) that the product, service or system meets specific requirements.
Certification Requirement	Specified requirement, including product requirements that are fulfilled by the applicant as a condition of establishing or maintaining Certification.
Certified Organisation	An organisation that holds a Certificate of Conformity for the Standard Scope(s).
Conformity	Fulfilment of a requirement.
Facilitator	An employee or contractor of the CAB that supports the assessment team in performing the on-site audit by being the eyes and ears of the assessment team on the ground during a live assessment. The facilitator does not need to be qualified as an assessor/auditor but should have technical knowledge of the standard and the material issues (animal welfare, rangeland stewardship, fibre processing).
IAF	International Accreditation Forum
Producer	A farmer, farm or nomadic herding family that produces cashmere fibre.
Remote (audit / assessment)	An audit that is not conducted on-applicant's site. For the purposes of this document remote audit refers to audits off-line (e.g. document review) and real-time virtual (e.g. video calls) approaches.
Site	Any geographically distinct unit within a certificate scope. Locations which are geographically distinct or have different civic addresses are considered to be separate sites (An exception is farms which can include: farms, facilities, offices. Subcontractors are not considered to be sites.
SFA Standard	Refers to the criteria documents which currently include Animal Husbandry and Cashmere Harvesting Code of Practice, Rangeland Stewardship Code of Practice, Clean Fibre Processing Code of Practice, as well as Chain of Custody requirements.
Suspension	The limitation of a certificate of compliance or accreditation due to a specific non-conformity or issue. A suspension may be lifted when the non-conformity or issue is resolved, and the certificate of compliance or accreditation becomes active again immediately.

4. PROCESS FOR CONDUCTING REMOTE AUDITS

3.1   Objective of this policy

This policy applies to SFA CABS and SFA Standard implementers and Applicants. This document specifies the Sustainable Fibre Alliance's policy for conducting remote Assessments of certified producers, processors, groups and supply chain operations. Remote Auditing Assessments will apply where the planned assessment schedule for on-site assessment is disrupted in specific contexts (see 4.2.2). This document defines the conditions and processes that Conformity Assessment Bodies (CABs) must follow to conduct remote assessment of the SFA's standards.

3.2   Remote Assessment

Remote Assessments will utilise technology (e.g., Zoom, WhatsApp, WeChat, etc.) to gather information, conduct interviews, observe processes, etc., when "face-to-face" methods are not possible. Annex A.1of ISO 19011 provides examples for the application of remote assessment methods in combination with on-site methods. For general recommendations on conducting remote Assessments, refer to ISO 9001 Auditing Practices Group Guidance on: REMOTE AUDITS.

For verification of the SFA standard, the SFA recommends the use of Remote Assessments in combination with on-site verification as soon as this is realistically possible (Partial Remote Assessment). In this case, the remote assessment is focused principally on documentary review of available data provided by the Applicant and a limited set of interviews conducted remotely. The verification is completed through targeted on-site assessment. In the case of Partial Remote Assessments, the remote assessment and the following on-site verification are considered as one single assessment process and should be planned accordingly.

However, where it is not possible to conduct an on-site verification in an appropriate timeframe, fully remote Assessments may be sufficient to issue a certification decision without an accompanying on-site assessment provided specific verification of the applicant's internal inspection results and other data on key risk areas have been undertaken.

3.3   Data Security

The CAB must ensure full confidentiality, security and data protection is in place for all data shared during the Assessment. Consideration must be given to the methods used to share and store data to ensure its security and confidentiality.

4.1 Feasibility of Conducting a Remote Assessment:

The CAB must have documented evidence of the reason for remote audit being applied (e.g., official publication of travel restriction due to pandemic).

The feasibility of conducting a remote Assessment should be considered when deciding whether to conduct a remote Assessment and establishing the Assessment plan, at a minimum the CAB should verify:

- That the applicant agrees to a remote Assessment and the proposed methods for conducting it.
- That the appropriate technology is available to share required documentation and connect directly with relevant staff or stakeholders as required; this includes appropriate skills, internet connection and bandwidth.
- That full confidentiality, security and data protection is ensured for all data shared during the Assessment. This may require specific agreements between the applicant and the CAB for the use of recordings, live streams and other media.

- That a risk assessment has been made to identify areas (people, activities, sites) that perhaps cannot be adequately assessed by remote Assessment alone.
- The risk assessment should also include:
    - Country/region/product-specific risks
    - Number and severity of prior non-conformities, particularly the most critical social, environmental and economic requirements
    - Complexity of operations or supply chains
    - Numbers of sites, workers or subcontractors
    - Known changes to Applicant's structure, scope or operations
    - Stakeholder feedback
    - Allegations/complaints and known issues in the public domain (NGO reports, media articles)

4.2   The Scope of the Remote Assessment

If it is feasible to conduct a remote assessment, the CAB must determine the most appropriate scope of the remote assessment. In all cases, the objective of a remote assessment is to establish the compliance level of the Applicant against the requirements of the SFA's standard scope(s).

4.2.1   Partial Remote Assessment

For verification of the requirements of the SFA standard, the SFA recommends the use of Remote Assessments in combination with on-site verification as soon as this is realistically possible (Partial Remote Assessment).

Partial Remote Assessment (current system)	
Definition	Assessments that are conducted through a combination of remote and on-site checks to verify compliance with the scope requirements (ISO 19011:2018, Assessment method selection and determination).
Applicable scopes	Certification of Animal Husbandry Certification of Rangeland Stewardship Certification of Clean Fibre Processing Certification of the Chain of Custody
Method	The remote portion of the Assessment shall follow the standard course of an assessment while using technological tools to access the necessary evidence. Partial Remote Assessments are most effective in verifying compliance with standard requirements which require documentary evidence. A limited set of interviews or other visual evidence will also be collected remotely. The aim is to provide a preliminary level of verification which is sufficient to allow a certificate to be issued pending further on-site verification whenever possible to confirm the certification decision. The on-site part of the assessment is intended to verify the conclusions of the remote Assessment and conduct additional verification of issues that could not be detected through the remote Assessment process.
Certification Decision	A certification decision may take several forms. 1. Issue no certification decision until the on-site assessment has been completed 2. Issue a positive certification decision based on the results of the remote assessment and inform the Applicant that an onsite assessment will be conducted within a specified timeframe. If during the on-site assessment the CAB finds evidence of non-conformities that were not

	identified during the remote assessment, or of non-conformities that have not been closed, the certificate will be suspended until the non-conformities have been addressed.
	3. Issue a positive certification decision with a limitation on volume until the on-site assessment is conducted and inform the Applicant that an onsite assessment will be conducted as soon as possible. The volume of the licence can be increased after onsite verification if no non-conformities on traceability are found. If during the on-site assessment the CAB finds evidence on non-conformities that were not identified during the remote Assessment, or of non-conformities that have not been closed, the certificate will be suspended until the non-conformities have been addressed.
	4.

4.2.2 Full Remote Assessment

In cases where onsite verification is not realistically possible within the current assessment cycle, a Full Remote Assessment will be necessary. In these cases, CABs can complete the certification process based on the results of the remote assessment. These cases include:

- Severe weather that makes travelling difficult
- Situations where an onsite assessment is impossible due to ongoing contextual disruptions and situations of Force Majeure (e.g., war, civil unrest, natural disasters and public health crises/ pandemics such as COVID-19).

Full Remote Assessment	
Definition	Assessments that are conducted through a combination of remote to verify compliance with the scope requirements. (ISO 19011:2018, Annex A. Supplementary guidance for Assessors planning and conducting Assessments).
Applicable scopes	Certification of Animal Husbandry Certification of Rangeland Stewardship Certification of Clean Fibre Processing Certification of Chain of Custody
Method	Remote assessment should follow the standard course of an assessment while using technological mechanisms and tools to access the necessary evidence, including interviews using appropriate sampling techniques. In addition to the verification of documentary evidence carried out in a Partial Remote Assessment, a Full Remote Assessment will use additional data to check criteria/checkpoints that cannot be verified in the desk-based document review. This should include interviews with staff and members conducted by telephone or by video link, and video footage of sites provided by the certificate holder/applicant. Where the collection of additional information remotely is not possible the Assessor must assess compliance with the internal inspection carried out by the Applicant before making the certification decision. CABs may also use analysis of the results of the previous assessment.
Certification Decision	A certification decision may take several forms. 1. Issue the positive certification decision based on the results of the remote Assessment alone, after remote verification of the closure of any non-conformities based on the timelines for closure.

	2. Issue the positive certification decision with a limitation on volume. The CAB may only grant 100% volume if no non-conformities are identified on traceability and the Assessor provides a clear assessment of the certificate holders volume estimation. The volume may be increased once evidence has been provided that identified non-conformities on traceability are successfully closed.

4.3 Establish the Assessment Plan

Once the CAB has determined the appropriate scope of the Remote Assessment, the assessment plan should be developed and agreed with the Applicant.

1. The remote assessment plan should be agreed with the Applicant and shared with the SFA at least 14 days before the Assessment. Applicants must agree to provide all requested information required for the assessment process, and an agreement signed between the CAB and applicant.

2. The assessment plan must include the preparation required by both the CAB and the applicant, the sampling processes and a description of how the meetings will be conducted (telephone, video link, etc). Please see Annex A: Practical considerations for virtual assessment

3. For Partial Remote Assessments, the remote assessment and the following on-site verification are considered as one single assessment process and should be planned accordingly. The assessment plan must describe which criteria/checkpoints will be assessed remotely and which will be part of the on-site assessment.

4. Once the assessment plan is finalised, the Lead Assessor assigned to the process should inform the Applicant of:

   a. the list of documents required for remote assessment verification. This list shall be prepared according to the sampling criteria for the records requested (training and workers' payment, labelling, transactions, suppliers' assessment, etc.)

   b. the sampling methods applied to all relevant requirements so that the Applicant can prepare accordingly

   c. The date by when all documentary evidence needs to be sent, which should be at least one week (5 working days) before the actual assessment date. The Applicant should have at least five days to prepare and send the documentary evidence

   d. In the case of groups and multi-sites, the Assessor shall include the sample of sites to be verified for the administrator to consolidate and submit the full documentary evidence.

4.4 Conduct the Assessment

1. Hold an opening meeting (by telephone or video connection) with management of the Applicant detailing how the assessment will be conducted and referring to all sections of the SFA standards that will be checked remotely. The Assessor shall keep a record of the attendees and any modifications to the assessment plan arising from the opening meeting, in the normal way.

2. The remote assessment will be conducted using a combination of documentary review and virtual meetings and interviews. Interviews will include appropriately sampled representatives of management and group member/ workers representatives and other stakeholders.

3. A Facilitator may be used for Remote Assessments (e.g., a technical expert present on-site during a video call with the Assessor). The Facilitator shall only follow live instructions of the Assessor and will not replace the Assessor in interviewing, conducting evaluations or reaching compliance conclusions. The Facilitator shall not participate in writing the assessment report.

4. Objective evidence of the remote assessment will be provided by conclusions from the interviews and document review.

a. For Partial Remote Assessments - direct interviews with workers, and physical verification of on-site procedures and facilities will be checked during the follow-up on-site portion of the assessment.
   b. For Full Remote Assessments as well as reports from the previous assessment and/or the results of self-assessment/internal inspection.
5. If an Applicant refuses to submit some of the required documentation due to valid confidentiality concerns, then information must be checked during an on-site evaluation.
6. For Partial Remote Assessments, adjustments may be made to the assessment plan at the conclusion of the remote assessment to adjust the scope of the onsite component assessment based on the findings of the remote assessment phase. Changes to the assessment plan must be communicated to the Certificate holder.
7. Hold a closing meeting with management following the normal assessment process highlighting the findings. For Partial Remote Assessments the closing meeting should also confirm the assessment plan for the on-site portion of the assessment.

4.5   Reach a Certification Decision

On completion of the remote assessment (partial or full) the CAB will issue a decision based on the options outlined above to the SFA, alongside the audit report containing full details of how the audit was conducted, process and steps, participants, technology used and findings. SFA retains the right to request further information or clarification before the certification decision is formally communicated with the Applicant.

The Applicant cannot make claims until formal notification of the certification decision by the CAB.

The CAB should provide feedback to SFA on the whole audit process and specifically issues around the remote audit practicalities (challenges to fully verify and assess the Standard requirements, technical considerations, interpersonal/soft skills, communication challenges).

For any questions please contact: standards@sustainablefibre.org

Annex A: Practical Considerations for virtual assessment

The CAB should present an audit plan and get the applicant's agreement (in writing, by email is acceptable), taking into consideration some practicalities:

- The desk review may take longer to create a robust audit plan which incorporates varied methods to assess evidence of compliance using remote means (e.g., "live" video walk arounds, share-screen if the applicant does not want to send through confidential or proprietary documents to the audit team, one-to-one interviews rather than in groups, broader outreach to local stakeholders, etc.)

- The agreement between the CAB and applicant must include data, confidentiality and security protection.

- The audit team may need to be increased to include other skills or knowledge, and any onsite facilitators. There should be clear definition of the onsite facilitator's role during the virtual audit.

- Technical needs at specified times – when and how technologies will be used must be included in the plan, as well as any specific training or set up for its use. Visual access to documentation may take longer remotely, and roles and required documents included in the plan with as much notice as possible, to enable the applicant to be fully prepared.

- There is a greater risk for misunderstanding with virtual communication tools and some interviewees may not be used to online meetings.

- Concentration may be affected and can impact the flow/timings of the audit (e.g., more frequent breaks)

- Meeting sizes may need to be reduced, with a preference to shorter one -to-one interviews.

- A contingency plan should be in place for technology failings.

- Worker and interviewee confidentiality and security must be protected through the audit protocols (especially in relation to any data that could identify an individual). This includes any recordings of meetings, photos, video capture, as well as data.