

Author: L. Bernstein	Social Accountability Accreditation Services	Issue: 1
Approval: R. Zaid	SAAS Procedure 200: SA8000 Advisory 11	Effective: August 22, 2011



SOCIAL ACCOUNTABILITY ACCREDITATION SERVICES

To: All SAAS Accredited Organizations and Accreditation Applicants

Subject: Structure of Accredited Certification Bodies and Subcontracting Activity

Background:

Accreditation is the process by which formal recognition of competence is given to qualified organizations, known as Certification Bodies (CBs), who are then granted the authority to perform certifications. Recognized certificates of compliance to SA8000 and other verification codes within the SAAS scope of accreditation are available only through qualified CBs granted accreditation by SAAS.

Many of the CBs accredited by SAAS are global firms, with one or several Head/Regional Offices managing the oversight of the SA8000 certification process with local offices that are either wholly owned by the CBs or are contracted with local representatives to manage their SA8000 auditors and auditing processes in different countries.

SAAS policies and ISO/IEC 17021:2006/2011 permit CBs to contract out part of their services to external providers providing that the accredited CB takes full responsibility for this subcontracted work and that the certification decision itself is not subcontracted. SAAS currently requires that the accredited CB (not an external subcontracted partner) be responsible for all of the policies for implementing their SA8000 certification program, system, the certification decision-making process, contractual agreements, and issuance of the certificate.

It is in the best interest of both SAAS and the CBs to ensure a high quality SA8000 certification process, and this high quality can be assured through an appropriate governance structure with the accredited CB taking full responsibility for SA8000 auditing work carried out worldwide. If a SAAS-Accredited CB wishes to subcontract¹ any part of its SA8000 certification auditing activities, it shall have a documented procedure that ensures the elements within this Advisory are followed.

The purpose of this Advisory is to ensure that accredited CBs maintain control, oversight, and responsibility over the SA8000 certification process. Regardless of whether a CB wholly owns a local office and directly employs an auditor, or subcontracts the activities, the auditor is conducting an SA8000 audit on behalf of the accredited CB, not on behalf of themselves as an individual subcontractor or on behalf of the externally subcontracted organization they are employed by. Thus, SAAS requires the accredited CB to exercise full control, oversight and responsibility over those subcontracted CBs, auditors, and local affiliate offices. Furthermore, all auditors, subcontract auditors and external subcontracted auditing companies must present themselves as representatives of the accredited CB and not as representatives of any other organization.

Clarifications to Procedure 200, clause 6.6 and SAAS Procedure 200, Advisory 4:

1. All SA8000 auditors that undertake any SA8000 audit shall present themselves as a representative of the accredited CB that has the authority to issue the SA8000 certificate. Individual subcontractors and/or subcontract auditing company representatives that undertakes SA8000 audit or audit related activity shall present themselves only as a representative of the accredited CB. For example, all forms of identification

¹ The use of subcontracted offices shall be considered as outsourcing as per ISO/IEC 17021:2006/2011, Clause 7.5, but this does not include the use of individual external auditors, as defined in ISO/IEC 17021:2006/2011 Clause 7.3. Consistent with this definition, SAAS considers the following situations as being subcontracted situations: a. the certification client is not invoiced directly by the accredited entity; b. the auditor is not paid directly by the accredited entity.

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such as business cards or marketing material shall only reference the accredited Certification Body.

2. Any additional contact information left with the SA8000 client, worker representative or employees shall include full contact details of the local representative (whether directly employed by a CB or working through a subcontract agreement) and the accredited head office. That contact information shall include:
 - a. The accredited CB's name and logo;
 - b. Contact information of the accredited head office;
 - c. Name and contact information of the local representative.
3. All CB auditors must utilize audit reports, stationery, and any other documentation used by the SA8000 auditor that contains the accredited CBs name and logo. No other audit reports, stationery or any other documents of the individual subcontractor or subcontracted organization shall be used.
4. All SAAS Accredited CBs shall ensure that their auditors, including subcontractors, have controlled copies of all of their policies and procedures that are required to perform SA800 audits and are sufficiently trained and competent in such policies and procedures.
5. The accredited CB is responsible for ensuring that all of their audit subcontractors maintain continuing education records and attend ongoing training to the level required of their directly employed auditors, per SAAS Advisory 5.
6. All Accredited CBs are required to demonstrate to the SAAS Accreditation Auditor, upon request, that all of their auditors are covered by their liability insurance, or, failing that, that of the individual auditor or the subcontract audit organization, as per ISO/IEC 17021:2006/2011, element 5.3.1.
7. Only a SAAS-accredited CB's logo may appear on an SA8000 certificate.
 - a. In the interest of transparency, subcontractors' details shall appear on the SA8000 certificate, displaying the name of the subcontracted organization which carried out the audit, where applicable. An individual subcontractor or the subcontracted organization's logo is prohibited from being displayed on any SA8000 certificate.
 - b. SAAS will provide the appropriate required text and parameters regarding display of the subcontracted organization's information.
8. All SA8000 certificates shall contain the following disclaimer: "Social Accountability International and other stakeholders in the SA8000 process only recognize SA8000 certificates issued by qualified CBs granted accreditation by SAAS and do not recognize the validity of SA8000 certificates issued by unaccredited organizations or organizations accredited by any entity other than SAAS." Additionally, all SA8000 certificates shall contain the address of the SAAS website (www.saasaccreditation.org/certification) where stakeholders can confirm the validity of an accredited SA8000 certificate.
9. The CB shall ensure the following controls are in place (note: this requirement only applies to that part of the business of the subcontractor that is providing SA8000 certification services):
 - a. The CB's accredited head office² shall either directly own or have a contractual agreement with each of its offices in other countries which are responsible for SA8000 certification activity being carried out in that country.
 - b. The accredited head office shall have a system for establishing employee contracts addressing confidentiality and conflict of interest with its own full and part time auditors.
 - c. The local offices shall have contractual agreements with each of their subcontracted auditors.

² Head office as defined in SAAS Procedure 200 1.4.b.

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10. The above requirements shall be described in a legally enforceable contract between the accredited CB and its local representatives including subcontractors, per ISO/IEC 17021:2006/2011, Clause 7.5.1.

Please complete the items below and fax or email back to SAAS by September 1, 2011 to acknowledge receipt of this advisory.

Incorporation into your procedures is required by January 1, 2012.

CB Name	
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Name of person completing form	
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Date Advisory No. 11 returned	
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