

Author: L. Bernstein	Social Accountability Accreditation Services	Issue: 1
Approval: R. Zaid	SAAS Procedure 201: SA8000 Advisory 9	Effective: August 22, 2011



**SOCIAL ACCOUNTABILITY  
ACCREDITATION SERVICES**

To: All SAAS Accredited Organizations and Accreditation Applicants

**Subject: Surveillance Requirements of Accredited Certification Bodies**

**Background:** SAAS has reviewed its methodologies for selecting sites to conduct audits of the accredited Certification Bodies (CBs) who provide SA8000 certification services. This included consideration of whether the existing parameters set out for determining the frequency and location of surveillance audits provided the best and most cost effective methodology for verifying that SAAS Accredited CBs continue to comply with the accreditation criteria. The following revised criteria create a more holistic surveillance system for the duration of a CBs accreditation cycle.

SAAS has revised the sampling process of selecting surveillance office audits for each CB so that this is now based on a CB's organizational structure and identified risk factors. The audits that SAAS chooses to witness are not based merely on the level of SA8000 activity in a country but rather on several other important criteria. SAAS has referenced the IAF GD 3:2003 in reviewing and revising these methodologies and in identifying critical locations of CB services. SAAS will confer with assigned client managers and directly with the CBs when preparing annual surveillance schedules and prepare a formal schedule of audits for each individual CB for review and planning purposes.

**Status: SAAS Procedure 201:2008, shall be amended as follows:** Annex A shall be deleted and replaced with the following:

**Annex A: SA8000-Specific Certification Program Requirements:** The following criteria are mandated for CBs performing SAAS Accredited SA8000 certification. Please see Table 1 for a visual representation of the requirements set out below.

**15.0 Reaccreditation and Surveillance:** This clause is amended as follows:

15.1.1

c. **Office assessment:**

- i. SAAS shall conduct a minimum of 1 Head Office<sup>1</sup> assessment of each CB annually.
- ii. Additional CB office locations shall be audited based on data provided by all CBs to specify and identify their locations of critical activity; based on those data, office audits shall take place as follows:
- iii. CB offices shall typically be subject to surveillance audits at a minimum of one time per accreditation cycle at those locations for which the answer is YES to any one or more of the questions below:
  - a. Office has staff with the authority to make SA8000 certification decisions.
  - b. Office has staff with the authority to manage the investigation of and report on SA8000 complaints.
  - c. Office has staff with the authority to qualify SA8000 auditors.
  - d. Office is located in a country that appears on the mandatory surveillance list<sup>2</sup>.

<sup>1</sup> Head office as defined in SAAS Procedure 200 1.4.b.

<sup>2</sup> SAAS will distribute, on an annual basis, a very brief list of countries that fall under mandatory office and witness surveillance for that calendar year. This list will be compiled in a transparent manner based on analysis of audit results, complaints received, and input from stakeholders.

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- iv. CB offices shall, in addition to the office audit criteria identified above, typically be subject to audits based on risk and sampling per the criteria below. The specific office selection may be adjusted on an annual basis as per changes to the CB's management system or identified risk factors as determined by SAAS. These office audits are intended to provide assurance that the CB is communicating effectively with its local offices and that they have in place a system for the global management of SAAS Accredited SA8000 certification.
- a. CB offices shall typically be subject to audits throughout the accreditation of the CB based upon a sampling methodology for those offices for which the answer is YES to any one or more of the following questions:
1. Office has staff with the authority to quote SA8000 audit days and undertake preliminary contract review.
  2. Office has staff with the authority to sign SA8000 client contracts.
  3. Office has staff with the responsibility to train, monitor and evaluate competence of SA8000 auditors.
  4. Office has staff with the authority to undertake technical reviews and evaluations of SA8000 audit reports.
  5. Office has staff with the authority to market SA8000.
  6. Office has staff that conducts SA8000 audits.
- b. CB offices shall also typically be subject to audits throughout the accreditation of the CB based on risk. These offices will be selected based on the following considerations, per country, in which the office is located:
1. Level of SA8000 audit activity.
  2. Number and nature of CARs issued/open.
  3. Number and nature of complaints related to the SA8000 system.
- v. The criteria above shall be used to identify office audits regardless of the ownership structure within the CB – specifically, this criteria shall also be used for those offices that have a subcontract<sup>3</sup> agreement with the SAAS accredited CB.

**d. Witness assessment:**

- i. SAAS shall typically conduct a minimum of 2 witness assessments of each CB annually.
- a. Additional assessments may be necessitated based upon the risk and sampling methodology identified below.
  - b. The requirement for 2 witness assessments per year may be relaxed based on a CB's growth in a country, history, and country risk factors.
  - c. Witness assessments are determined according to the following:
- ii. For those countries in which a CB has currently valid certifications AND which appear on the mandatory surveillance list, annual witness assessments in those locations are required.
- iii. For those countries in which a CB has currently valid certifications AND which do not appear on the mandatory surveillance list, witness assessments shall be conducted based on risk and sampling. The criteria for selection of countries shall be as follows:
- a. Number of certified facilities.
    1. Higher numbers of certificates may result in higher frequencies of witness assessment in a particular country.
    2. Lower numbers of certificates may result in lower frequencies of witness assessment in a country.

<sup>3</sup> 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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- b. Increase, decrease or stagnation of the level of growth of certified facilities, number and subject of CARs issued, and/or number and subject of complaints received over time.
        - 1. Increase of any element listed above may result in a higher frequency of witness assessment in a particular country.
        - 2. Decrease or stagnation of any element listed above may result in a lower frequency of witness assessment in a country.
  - iv. Individual witnessed audit sites shall be selected by SAAS in order to witness a wide spectrum of facilities and auditors in witness assessments for a CB over an accreditation cycle. The following criteria will be used as a guideline in selecting witnessed sites:
    - a. Types of industries and sectors in which the certified facilities operate.
    - b. Size of the certified facilities.
    - c. Whether SAAS auditors have witnessed the CB's individual SA8000 auditors previously.
    - d. Whether SAAS auditors have witnessed the CB's individual subcontracted SA8000 auditors previously, especially in those cases where a CB has multiple subcontractors in the same country.
    - e. Whether the audit to be conducted by the CB is an initial, periodic surveillance, recertification, or transfer audit.
  - v. If a CB wishes to expand its SA8000 Certification activities into a new country, the CB shall formally notify SAAS on the appropriate reporting form. SAAS shall review the information and issue a revised accreditation certificate annex. In each case, SAAS shall undertake a review of submitted documentation to determine whether the following must take place in the same calendar year and/or additional audits in that location for the remainder of the accreditation cycle:
    - a. If the new country appears on the mandatory surveillance list, SAAS shall conduct a review and confer with the CB and client manager to determine whether there is a need to witness a Stage 2 client audit in that new country in that year.
    - b. If the new country does not appear on the mandatory surveillance list, SAAS shall conduct a review and confer with the CB and client manager to determine if additional surveillance activities (such as document reviews or interviews with auditors) will be required.
- 15.1.2 Based on the criteria in 15.1.1, a minimum of 1 surveillance assessment (office and/or witness) of accredited certification bodies shall occur at six month intervals. These surveillance assessments may be carried out within three months before or after the nominal due date, the actual date to be agreed upon by SAAS and the CB.
- 15.2.1 The CB must have a minimum of 5 active SA8000 certification accounts to apply for reaccreditation. If this is not the case at the time of the application for re-accreditation, the CB will be given a once-only six-month extension in order to achieve this target. If this is not met, the CB's SAAS accreditation will automatically be cancelled and withdrawn at the end of that six month period.

**20.0 Obligations of the Certification Bodies** This clause is amended as follows:

- 20.2 Each accredited CB shall promptly notify SAAS of any intended or actual changes to its management system or any other changes that may materially affect its conformity to the accreditation criteria. This requirement encompasses, as an example, any such changes in a country within the scope of accreditation where new countries, 5-10 or more SA8000 assessments, or other such expansions have taken place, as well as at its headquarters. Additional examples include changes to:
- a. Legal, commercial or organizational status;
  - b. Organization and management, for example key managerial staff and changes to the accreditation decision process;
  - c. Policies and procedures related to SA8000
  - d. Personnel, equipment, facilities, location, working environment or other resources;
  - e. The intended use of subcontractors;
  - f. Acquisitions of or mergers with other CBs.

Table 1

CB Location	Criteria	Initial Accreditation	Surveillance	Reaccreditation
15.1.1.c.i. CB's Head Office	As defined in Procedure 200, 1.4b	Office Audit	Annual office audit	Office Audit
15.1.1.c.iii. Locations (excluding Head Office) where the CB has offices fulfilling one or more of the following criteria:	a. Staff with authority to make SA8000 certification decisions.	Office Audit	One office audit per location within accreditation cycle	One office audit per location within accreditation cycle
	b. Staff with authority to manage investigation of and report SA8000 complaints.	Not applicable		
	c. Staff with authority to qualify SA8000 auditors.			
	d. Office located in country on mandatory surveillance list.			
15.1.1.c. iv. Locations (excluding Head Office) where the CB has offices fulfilling one or more of the following criteria:	1. Staff with authority to quote SA8000 audit days and undertake contract review.	Not applicable	Office audit, sampled, throughout the accreditation of the CB	Office audit, sampled, throughout the accreditation of the CB
	2. Staff with authority to sign SA8000 client contracts.			
	3. Staff with responsibility to train, monitor, evaluate SA8000 auditors.			
	4. Staff with authority to undertake technical reviews and evaluations of SA8000 audit reports.			
	5. Staff with authority to market SA8000.			
	6. Staff who conduct SA8000 audits.			
	1. Level of SA8000 audit activity.			
	2. Number and nature of CARs issued/open.			
	3. Number and nature of complaints related to the SA8000 system.			
	15.1.1.d.ii. Those countries in which a CB currently holds certifications AND which appear on the mandatory surveillance list.			
15.1.1.d.iii. Those countries in which a CB currently holds certifications AND which do not appear on the mandatory surveillance list.		SAAS will witness CB's audit of the chosen client.	Minimum 2 witness audits. Sampled based on criteria indicated.	Minimum 2 witness audits. Sampled based on criteria indicated.

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This Advisory will be incorporated by SAAS into its accreditation and surveillance procedures no later than September 30, 2011.

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

CB Name	
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Name of person completing form	
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Date Advisory No. 9 returned	
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