

ISSUE 05 – GRADING OF EVALUATION FINDINGS

APAC Lead Evaluator Training Objectives:

Establish acceptance of Findings definitions contained in the latest version of IAF/ILAC A3.
Discuss where consensus may present difficulties.

ILAC Finding: NC-05 and APAC Response

ITEM	CONSIDERATION
NC # 05	In several peer-evaluation reports the grading of findings is not in line with IAF/ILAC A2, since partial or minor non-fulfilments of requirements are not recorded as non-conformities. IAF/ILAC A1, §2.2.2, IAF/ILAC A2, Annex 2, §3 and IAF/ILAC A3, Part 3
Response from the Region	APLAC follows the ILAC definition of findings as non-conformities, concerns, and comments. Under this scheme, these definitions are not black and white, and are subject to the experience/interpretation of individual evaluators. In practice, the accreditation body under evaluation also responds fully to concerns (as well as non-conformities). It is also noted that the definitions of 'Non-conformity' and 'Concern' and the associated evidence required for close out are under review by the IAF-ILAC JWG A-series due to differing interpretations of these findings. APLAC make any necessary changes based on the outcome of this review.
Reaction from the ILAC evaluation team	Corrective action needed and not described (e.g. training to peer-evaluators, review of findings).
Response from the Region	As this issue was also raised by EA and ILAC AMC, APLAC will await the completion of the discussion regarding the new version of findings classification to come out of the JWG A Series in order to provide definitive training to APLAC Evaluators. In the meantime, Lead Evaluator Training will emphasise the current definitions in training to be held in 2019. See Case Study 1 attached. The APAC Evaluation Review Panels (ERPs) will review all Non-conformities, Concerns and Comments raised in evaluation reports to ensure that the new definitions are being adopted.
Reaction from the ILAC evaluation team	Corrective action accepted, finding can be closed.

IAF-ILAC A3, Classification of Findings – also in APAC MR 001

Part 3 B. Guidance on Classification of Findings from IAF/ILAC-A3:01/2018

Finding:

To be used as a general term

Nonconformity:

Finding where the AB does not meet a requirement of the applicable standard (ISO/IEC 17011), its own management system and the Arrangement requirements.

The evaluated AB is expected to respond to each non-conformity by taking appropriate corrective action and providing the evaluation team with evidence of effective implementation.

Concern:

Finding where the AB's practice **may** develop into a non-conformity.

(READ: POTENTIAL NON-CONFORMANCE = NOT YET A NON-CONFORMITY AND MAY NEVER BECOME ONE)

The evaluated AB is expected to respond to a concern by providing the evaluation team with an appropriate action plan and time schedule for implementation.

Comment:

Finding about documents or AB's practices with a potential of improvement; but still fulfilling the requirements.

The evaluated AB is encouraged to respond to comments.

Acceptable / Possible solutions

Determine whether or not these definitions from evaluation requirements documents have a common basis of understanding between evaluators and, if not, facilitate discussion to promote universally agreed application.

Case Study 1 – Grading Findings.

Definitions currently contained in IAF-ILAC A3 02 2018.

Nonconformities

Finding where the AB does not meet a requirement of the applicable standard(s) e.g. ISO/IEC 17011, its own management system or the Regional Body requirements.

Concerns

Finding where the AB's practice may develop into a nonconformity.

Comments

Finding about the AB's documents or practices with a potential of improvement but still fulfilling the requirements.

Questions to Lead Evaluators:

- Which of these definitions point to a condition that clearly does not meet written specification?
- Which of these definitions is really only a suggestion about how an AB may improve or enhance their operations, without there being any current problem with meeting written specification?
- Which of these definitions point to a condition that currently meets specification, but demonstrates a risk to not doing so in the future?