

INTERIM POLICY NO. 2 ON REMOTE AUDITING- INITIAL CERTIFICATION AUDITS

EFFECTIVE JULY 13, 2020

PURPOSE

As continued evolution of our policy on conducting AWS audits towards certification, this policy addresses **remote auditing for initial certification audits**. In order to allow CABs to effectively plan long term, this option will be available at least through the end of 2020, regardless of when the COVID-related travel restrictions and other bans are lifted. Towards the end of 2020, we will decide if this can remain as a permanent option.

OFFSITE AUDITING REQUIREMENTS

Unless advised otherwise in the future, CABs will have some flexibility regarding the details of how they will perform the audits. It is understood that any form of offsite audit loses the benefit of direct observation by the auditor. This includes not only the site "walk through", but observation of visual evidence as it compares to what is said by site personnel, general sense of attention to detail, and overall housekeeping at the site. Also, area-wide reconnaissance to get a spatial sense of the site in the catchment is limited. Conversely, elements such as opening and closing meetings, specific interviews with site personnel, and document review can occur remotely, whether as a desktop exercise or using virtual communications methods.

Risks associated with remote auditing are magnified when doing initial certification audits in that there may not yet be any history or familiarity with the site and its AWS implementation. In many cases, this audit is the first opportunity for the CAB to engage with the site and the organization.

CABs will provide AWS in writing (via email is acceptable) with a general overview of their procedures and plans for offsite audits. CABs do not need to share sensitive or highly proprietary forms or templates but do need to provide enough for AWS to ensure there is a robust enough process.

CABs will adhere to all AWS Certification Requirements and follow all procedures for their audits as if they were normal onsite audits. This includes but is not limited to: audit plans, public announcements, document reviews, staff and stakeholder interviews, and other elements to assess conformance to AWS Standard criteria and indicators. Alternative (normally digital) solutions to virtually audit the elements that are usually inspected at the site or in the catchment (e.g. interviews of non-AWS Team implementation staff, visits to water sources and water discharge visits, virtual catchment visits, etc.) should be developed and recorded. This could include videoconferences, live 'virtual walk around' filming, and an increase in the number and type of stakeholder group comments that are reviewed digitally and interviewed virtually. This should be well recorded in the audit report to ensure these elements are prioritised when the CAB can conduct a full on-site audit. In addition, for cases of offsite initial certification audits, all of the following requirements also apply:

- CABs will advise AWS in writing (email acceptable) at least two weeks advance for each proposed offsite audit in order to obtain approval to proceed. This will include completing a risk form for the site,

which helps define the level of risk to the certification integrity. CABs must obtain approval to proceed from AWS before conducting the audit.

- Use of technology that will enable virtual site “walk arounds” and that all site aspects can be remotely viewed and photographed. This may include telecommunications access and ability to livestream video.
- The minimum 30-day stakeholder outreach criteria in the AWS Certification Requirements is to be strictly followed.
- At least 3 internal and 3 external stakeholders defined in the stakeholder mapping supplied by the site are thoroughly interviewed by the audit team. For stakeholder groups, not all members of a single group need to be interviewed, but there must be at least one representative from the stakeholder group in question.
- CABs will advise AWS in writing (email is acceptable) of their decision for certification after their internal committee reviews of audit reports prior to alerting the site. AWS has the right to reject a recommendation for certification if based on the audit report and initial risk profile there is a problem or concern. Announcement of certification will be held until any issue is resolved. Sites noted to be in contentious areas regarding shared water challenges or based on anticipated stakeholder concerns will be closely scrutinized before approving any recommendation for certification.
- Certificates can be issued to sites demonstrating satisfactory conformance to AWS requirements in accordance with existing procedures and requirements. However, these certificates are considered “provisional” pending the first opportunity for the CAB to visit the site. Sites can claim to be certified during this provisional period but understand that the certificate can be revoked upon the first visit if the CAB identifies an issue which would have prevented recertification had it been noted during a normal onsite recertification audit.
- Even if it does not occur until a subsequent surveillance audit, on the first available onsite visit, the CAB must eventually conduct onsite-only activities (visual reconnaissance, etc.) that would normally have occurred during an onsite recertification audit.

This policy also clarifies that sites currently transitioning from the European Water Standard (EWS) to the AWS Standard are permitted to do remote transition audits, provided they follow the pre-approval process defined above. For EWS to AWS audits, the audit must cover and explicitly confirm conformance with all AWS requirements that are not part of EWS. This may require additional document review and inquiry, as well as additional stakeholder interviews, above and beyond the points listed above.

AWS is ensuring that processes for offsite certification audits conform to all ISEAL Codes and guidance, as well as ISO standards, and the International Accreditation Forum, Inc. document “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

(https://committee.iso.org/files/live/sites/tc176/files/documents/ISO%209001%20Auditing%20Practices%20Group%20docs/Auditing%20General/APG-Remote_Audits.pdf).

If you have any questions, please contact AWS Standards and Assurance Department, edwin@a4ws.org.