

Performing Remote Evaluations – Requirements and Guidance

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# Introduction

* 1. As information and communication technology (ICT) becomes more advanced there is an opportunity to use it in evaluation activities, either on an ongoing basis or for extraordinary situations. Use of ICT must be managed to ensure the integrity and confidence in the evaluation process is not adversely affected.
  2. This document provides requirements and guidance to APAC evaluators on how to plan, manage, and facilitate remote evaluations using ICT as a complement or substitute to traditional evaluation techniques.
  3. Remote evaluations provide APAC additional evaluation techniques to facilitate the evaluation of the Accreditation Bodies (ABs). Further, remote evaluation techniques may permit APAC evaluators to witness and evaluate more AB assessment activities than on-site evaluations.

1.4 Examples of using ICT during evaluations may include but are not limited to:

1. meetings, utilizing teleconference facilities, including audio, video, and data sharing;
2. evaluation of documents and records, utilizing remote access, either in real-time or at another time offline;
3. recording of information and evidence, utilizing pictures, video, or audio recordings;
4. providing visual/audio access to remote or potentially hazardous locations; and
5. observing the use of remote assessment techniques in use by the AB.
   1. The objectives of this document about using ICT in evaluation activities are to:
6. provide a consistent methodology for the use of ICT that is sufficiently flexible and non-prescriptive to complement or substitute traditional evaluation techniques;
7. allow for the confirmation of AB conformance and competence while maintaining confidence in the evaluation process;
8. ensure that adequate controls are in place to avoid any mishandling that could compromise the integrity of the evaluation process, especially at times the on-site evaluations are not practically feasible;
9. facilitate additional evaluation activities (e.g. observation of AB technical meetings (e.g. technical advisory committees, assessor forums, management reviews, etc.) that typically would not be available during the traditional evaluation; and
10. support the principles of safety and sustainability.
    1. Regulatory requirements, stakeholder schemes and programmes, conformity assessment standards and other normative documents, may prescribe limitations on the use of ICT for evaluation purposes and may take precedence over this document.

# Scope

#### 2.1 This document provides requirements and guidance for the consistent use of ICT as part of the evaluation process. It applies when the majority of the evaluation activities will take place electronically. It does not apply to the general use of email or the limited use of ICT to facilitate communication, such as occasional web conferencing or the electronic sharing of documentation.

#### 2.2 In the case of initial evaluations remote evaluation techniques may be used in addition to the on-site witnessing of AB assessments.

#### NOTE Refer to clause 9 for further details.

#### 2.2 In the case of Level 3 scope extensions, remote evaluation techniques may be used in addition to the on-site or remote witnessing of AB assessments.

#### NOTE Refer to clause 9 for further details.

#### 2.3 In the case of re-evaluations for Level 3 scopes for which the AB is already an APAC MRA signatory, remote evaluation techniques may be used entirely for the evaluation as long as the evaluation process confirms the demonstrated conformity of the APAC MRA requirements (including ISO/IEC 17011 conformance) at the same, or greater, level of confidence as the traditional face-to-face on-site evaluation process.

# References

[APAC MRA-001](https://www.apac-accreditation.org/publications/mra-series/) APAC Procedures for Establishing and Maintaining Mutual Recognition Amongst APAC Accreditation Bodies

# Objective

#### The objective of a remote evaluation is to establish the level of confidence in the AB activities by direct observations carried out through an electronic medium. Remote evaluations provide the opportunity for increased efficiency, increased safety, better timing, the inclusion of AB personnel that may not be easily accessible, and avoidance of travel delays and restrictions.

# Definitions

* 1. **Remote evaluation**

Evaluation of the physical location, virtual site or accreditation activities of an accreditation body, using electronic means.

NOTE Remote evaluation may apply to any of the following evaluation activities:

* review of documented information (e.g. accreditation schemes, the AB’s management system, policies, procedures, files and records);
* review of competency management (e.g. competency definitions and assessments, training, performance monitoring and reviews, competency approvals, etc.);
* review of quality controls (e.g. internal audits, corrective actions, management reviews, handling feedback and complaints, etc.);
* interviewing personnel;
* witnessing accreditation activities (e.g. assessments, internal meetings, etc.).
  1. **Information and Communication Technology (ICT)**

Use of electronic technology for gathering, storing, retrieving, processing, analysing, and transmitting information. ICT includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others.

# Initiation and refusal of remote evaluations

6.1 Remote evaluation may be proposed by APAC evaluators, the evaluated AB or the APAC MRAMC. The use of remote evaluations may be voluntary, by mutual agreement, or may be initiated at the discretion of the APAC MRAMC to fulfill evaluation needs (including surveillance, investigations, verifications, etc.).

6.2 Once proposed, the APAC evaluators and evaluated AB are to discuss and determine the viability of the remote evaluation after considering APAC FMRA-021 *Remote Evaluation Checklist and Risk Assessment*. If the APAC evaluators or evaluated AB refuse to undertake the remote evaluation the matter can be referred to the MRAMC Chair for a decision.

# Risks to Evaluations

#### 7.1 APAC evaluators identify and document the risks that may impact evaluation effectiveness for each use of ICT, including the selection of the technologies, and how they are managed.

#### NOTE The risk assessment is to be recorded using APAC FMRA-021 *Remote Evaluation Checklist and Risk Assessment*.

#### 7.2 When ICT is proposed for the evaluation activities, APAC evaluators should check that the AB and the APAC evaluators have the necessary infrastructure to support the use of the ICT proposed.

#### 7.3 Considering the risks and opportunities identified in 7.1, the evaluation programme should identify how ICT will be utilized and the extent to which ICT will be used for evaluation purposes to optimize evaluation effectiveness and efficiency while maintaining the integrity of the evaluation process.

#### 7.4 When using ICT, evaluators and other personnel involved (e.g. technical experts) should have the competency and ability to understand and utilize the ICT employed in order to achieve the desired results of the evaluation. The evaluator should be aware of the risks involved in the use of the ICT and the impacts that they may have on the validity and objectivity of the information gathered.

#### 7.5 Where the evaluation activities need to be translated in “real time” additional checks may be needed to prevent translation from interfering with the evaluated activities. The evaluated AB shall make sure that any translators can participate effectively in the remote evaluation process.

# Security and Confidentiality

#### 8.1 The security and confidentiality of electronic or electronically transmitted information are particularly important when using ICT for evaluation purposes. This includes data in storage, data in transit, and data in use.

#### 8.2 The use of ICT for evaluation purposes should be mutually agreed upon by the AB and APAC evaluators per information security and data protection measures and the respective local regulations before ICT is used for evaluation purposes. The respective jurisdictions’/regions' data protection and privacy laws should be strictly adhered to.

#### 8.3 Any conflicting issue should be resolved before the commencement of the remote evaluation process.

#### 8.4 In the case of non-fulfillment of these measures or lack of agreement on information security and data protection measures, the APAC MRA Chair may be consulted.

# Remote Evaluation Considerations

#### 9.1 In general, the scope, planning, evaluation process, and documentation of the evaluation should follow APAC MRA-001.

#### NOTE When the working language of the AB is not the English language, more time may be needed to prepare for the evaluation, arrange and trial simultaneous translation, and review records (including personnel files and assessment files).

9.2 Remote evaluations may be considered when one or more of the following situations apply:

1. travel to an AB or specific location is not reasonable/feasible;
2. a visit to an AB or evaluation location is not possible during crises or directions from government or regulators based on security, health, and safety measures;
3. there are unavoidable changes in scheduling for the evaluator or the AB (i.e. personal issues, change in business priorities, etc.);
4. the number of sites to be evaluated is difficult for the AB to organise within the evaluation timeframe;
5. the AB has a systematic implementation of its management system where records, data, etc. can be reviewed at any site, regardless of where the work is being performed;
6. the risk level of the evaluation is deemed low;
7. an activity or activities planned for the on-site evaluation could not be completed and extending the on-site evaluation is not the best resolution; or
8. a follow-up evaluation is necessary but another on-site visit cannot be conducted in a reasonable timeframe;
9. where a particular component of the AB operations is considered worthy of increased observation/sampling.

9.3 Remote evaluations may be undertaken in circumstances other than those detailed in clause 9.2. In such cases the evaluator shall present the rationale for the remote evaluation (or the remote evaluation of specific activities) for approval by the MRAMC Chair.

# Determining Eligibility

10.1 The APAC evaluator determines whether remote evaluation techniques are feasible before the evaluation with the evaluated AB and completes APAC FMRA-021 *Remote Evaluation Checklist and Risk Assessment*.

10.2 Once the APAC FMRA-021 is completed, the APAC evaluator sends it to the APAC MRA Council Chair who approves the use of remote evaluation techniques and communicate this to the APAC evaluator and AB.

# Planning and Scheduling

11.1 If ICT is used for evaluation purposes, it often contributes to the total evaluation time, as additional planning may be necessary which may impact evaluation duration.

11.2 Before initiating remote evaluation techniques, it is important to specify:

1. the agenda and sequence of activities for the remote evaluation;
2. the scope of accreditation activities to be subject to the remote evaluation techniques, including the list of accreditation activities, areas and schemes;
3. clear expectations for pre-defined documented information that is to be made available during the remote evaluation; (e.g. records etc.);
4. the availability of necessary AB personnel, conformity assessment body personnel and interpreters (if relevant);
5. the agreed timing of the remote evaluation activities taking into account the different time zones of all parties involved in the remote evaluation activity; and
6. the timeframe for conducting the remote evaluation (e.g. 4 hours a day for 3 consecutive days).

#### NOTE Timing should:

#### reflect a similar amount of overall time as would be allocated during traditional evaluation techniques;

#### be segmented into periods of connectivity that is optimal to avoid fatigue (especially in cases where different languages are being used);

#### include time for breaks; and

#### allow for individual review and reflection of provided information by the evaluator.

1. a plan on how to review information that cannot be shared remotely (e.g. due to confidentiality or access issues). The evaluator should define or express how this will be dealt with (e.g. follow-up evaluation, issuance of a nonconformance, etc.).

#### NOTE Personnel facilitating remote evaluation may not be permitted to share certain confidential information or there may be an existing corporate policy on how certain mediums cannot be used to provide such information.

11.3 The AB shall provide to the APAC evaluator prior to the conducting of remote evaluation:

1. all the normal information required for the evaluation in accordance with APAC MRA-001;

NOTE 1 Some information, such as project reports and client files, may need to be sent or otherwise shared with the evaluator for review before the remote evaluation.

NOTE 2 Remote access to documented information (procedures, policies, records etc.) can be facilitated though temporary password-protected online access with ‘view-only permissions’ for the evaluator. This can be set up through arranging a temporary profile for the evaluator to access the ABs intranet or internal file directories, or through online or cloud-based document management systems (e.g. SharePoint, DropBox, Microsoft Teams, GoogleDocs, etc.).

1. contact details of designated individual(s) that will facilitate, manage, and coordinate the arrangements of the remote evaluation on behalf of the AB, including any translators where required;
2. applicable files, projects, reports, etc.;
3. summary of key changes (i.e. personnel, organization, equipment, accredited methods) in the AB since last on-site evaluation; and
4. any other evidence deemed essential and necessary.

11.4 Planning shall include selection and confirmation of the specific ICT technologies to be used taking into account the following considerations:

1. the nature of the evaluation activity being undertaken, and the number of simultaneous ICT connections required for the relevant AB personnel and evaluators. It may be necessary to only conduct a single remote activity at a time;
2. the ICT platform (e.g., Go-To-Meeting, WebEx, Microsoft Teams, Zoom, etc.) and hardware for hosting the evaluation, to be agreed upon between the APAC evaluator and AB;

NOTE 1 Identifying several ICT platforms is recommended in case one ICT platform fails to perform.

NOTE 2 If the evaluated AB is providing the ICT platform, it may be necessary for the evaluation team meetings to be held using a different platform and account. If this is the case, the platforms should be confirmed and tested by the team prior to the evaluation.

1. the ICT security measures that must be undertaken to protect confidential information. This includes ensuring secure physical locations from which to join remote evaluation activities for all the parties involved;
2. enabling any security and/or profile access to the evaluator(s) and others involved in the evaluation;
3. testing ICT compatibility between the evaluator(s) and the AB before the evaluation by performing a trial run;
4. encouraging and considering the use of webcams, cameras, etc. when physical evaluation of an event is desired or necessary; and
5. any recording of remote activities, including discussions that take place, should be agreed upon by both parties before the evaluation. This includes arrangements for storage and disposal of recordings; and
6. how to respond to connection difficulties and failures.

# Performing an Effective Remote Evaluation

#### 12.1 If demonstration of conformity with a requirement is not able to be reviewed, or a complete determination not be able to be made, this failure or limitation shall be recorded as a nonconformity in the evaluation report.

#### 12.2 The evaluation should be facilitated in quiet and secure environments whenever possible to avoid interference and background noise (i.e., speakerphones) and ensure information security.

#### 12.3 The most effective types of ICT should be chosen. Multiple types of ICT may be considered during the same evaluation.

* 1. The use of headphones or advanced microphones should be considered to assure clear communication.

#### 12.5 Facilitation of the evaluation should follow normal evaluation plans and processes.

#### 12.6 The AB should scan the room and perform a walk-through of the organization for evaluators to gain a ‘lay of the land’ and to determine who is in the room.

#### 12.7 Participants should always introduce themselves when speaking if multiple people are involved. Both parties should make their best effort to confirm what was heard, stated, and read throughout the evaluation.

#### 12.8 All remote evaluations should be concluded with a summary, review of the events each day, clarification of issues, apparent nonconformities, and expectations.

#### 12.9 All parties should take appropriate measures to safeguard the confidentiality of data in any format.

#### 12.10 There should be an allowance for the evaluator to terminate the evaluation activity due to an inability to maintain satisfactory connections or conditions during the scheduled time. This should be recorded in the evaluation report.

#### 12.11 The evaluator, the evaluation team and the AB should review the effectiveness of the remote component. Where possible, “gaps” should be addressed prior to concluding the evaluation. Actions taken in response to limitations identified during a remote evaluation should be detailed in the evaluation report.

# Witnessing

#### 13.1 Effective witnessing can be one of the most difficult parts of the remote evaluation process. Preplanning and preparation for each area to be witnessed should be performed.

#### 13.2 Access to high-speed internet and/or cell signals is critical to assure clear and effective audio and video.

#### 13.3 Preplanning and testing of the chosen ICT should be performed for each witnessing activity at the location of witnessing. Dead spots or weak connectivity should be identified.

#### 13.4 Video presentation skills of the AB during witnessing are critical. This should be discussed in the planning phase. The AB may need to set up a fixed camera location or consider a dedicated personnel to take the video and photos. AB video/camera skills often improve over time and may result in increased evaluation effectiveness and efficiency.

#### 13.5 Portability, connectivity, and battery life of the video device should be considered.

#### 13.6 Live video streaming should be preferred. This provides real-time and interactive evaluation and reduces risks to integrity that may be associated with pre-recorded video.

#### 13.7 Pre-recorded AB video demonstration may be considered. The APAC evaluator should consider any risks associated with the integrity of a pre-recorded video and implement measures to mitigate this risk, and confirm how pre-recorded material is to be stored or deleted once the evaluation activities are completed.

#### 13.8 Evaluators should be able to direct the video imaging of the witnessed activity by the AB to ensure the effectiveness of the demonstration. Evaluator proficiency to perform this activity should be considered.

# Post Evaluation Activities

#### 14.1 Evaluation reports, findings and follow-up of corrective actions are to be undertaken in accordance with APAC MRA-001.

#### 14.2 Evaluation reports indicate the extent to which ICT has been used in carrying out evaluation and the effectiveness of ICT in achieving the evaluation objectives.

#### 14.3 If virtual sites are included within the scope, the evaluation documentation should note that virtual sites are included, and the activities performed at the virtual sites should be identified.

AMENDMENT TABLE

This table provides a summary of the changes to the document with this issue.

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| --- | --- | --- |
| Date | Section(s) | Amendment(s) |
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| 20/10/2020 | All | Document approved by APAC Executive Committee. |