



FORMAL COMPLAINT SUBMITTAL r0

Centre for Assessment LTD
Lee House
90 Great Bridgewater Street
Manchester
M1 5JW United Kingdom

Via email to: helen.taft@centreforassessment.co.uk

CC to: Jackie.burton@UKAS.com, secretary@IAF.nu, andreas.steinhorst@european-accreditation.org

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1. PREAMBLE

Oxebridge Quality Resources International (Oxebridge) hereby requests formal corrective action in accordance with clauses 4.7 and 9.8 of ISO 17021-1:2015, to include a documented acknowledgment of receipt of this complaint, a thorough and systemic investigation, corrective and preventive corrective action, and notification of actions taken when complete.

NOTE: ISO 17021-1 clause 4.7 indicates that complaints may be issued to certification bodies by “parties that rely on certification,” and not only direct clients of the certification body. It furthermore references ISO 10002 in its section on complaints, and ISO 10002 allows for the submission of complaints to certification bodies by “interested parties,” and not just direct customers. Based on this information, Oxebridge asserts it right to submit this complaint not only on behalf of its clients, but on behalf of itself as an interested party and industry stakeholder, directly concerned with the validity of the certificates issued by accredited certification bodies.

2. APPLICABLE ISO 17021 CLAUSES

The herein complaint relies on the knowledge that the Centre for Assessment (hereinafter “CfA”) is accredited by UKAS to ISO 17021-1:2015 for the issuance of ISO 9001 certificates, and that as a result CfA is subject to the following rules and definitions from ISO 17021-1:

4.2.3 To obtain and maintain confidence, it is essential that a certification body's decisions be based on objective evidence of conformity (or nonconformity) obtained by the certification body, and that its decisions are not influenced by other interests or by other parties.

4.2.4 Threats to impartiality include the following:

a) Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.

c) Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.

5.2.3 When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of the certification body requesting certification from its parent), then certification shall not be provided.

NOTE A relationship that threatens the impartiality of the certification body can be based on ... shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients, etc.

5.2.7 The certification body shall not certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and the certification body poses an unacceptable threat to the impartiality of the certification body.

5.2.9 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides management system consultancy. The certification body shall take action to correct inappropriate claims by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if the certification body were used.

5.2.11 The certification body shall take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.

5.2.12 All certification body personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality.

5.3.2 The certification body shall evaluate its finances and sources of income and demonstrate to the committee specified in 6.2 that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.

8.1.1 The certification body shall maintain (through publications, electronic media or other means), and make public, without request, in all the geographical areas in which it operates, information about (e) processes for handling requests for information, complaints and appeals.

3. EVIDENCE

Note: copies of evidence are on file with Oxebridge, and available for review, in the event that links have changed since the filing of this complaint.

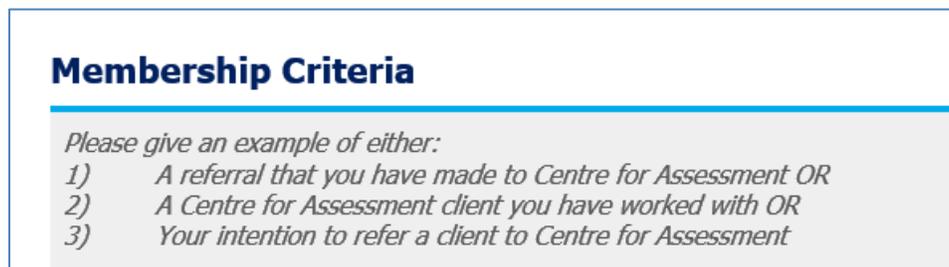
Oxebridge Quality Resources International operates an international ISO Whistleblower Program available to all stakeholders and the general public. On May 4, 2020, Oxebridge received an anonymous report through this program alleging that CfA was openly marketing an improper relationship with consultants through its "CfA Directory of Consultants" program. Oxebridge then independently verified this allegation through review of public domain information, largely taken from the CfA website itself.

The CfA Directory of Consultants program invites consultants to join by submitting their information through an official CfA website form located at <https://www.centreforassessment.co.uk/directory-of-consultants/>. That then allows the consultant to download a form entitled “CfA Directory of Consultants Application Form.”

The application form then defines three “Membership Criteria” for consultants seeking membership in the CfA Directory of Consultants, all of which are tied to making or having made “referrals” for consulting clients to CfA:

- “1) A referral that you have made to Centre for Assessment OR*
- 2) A Centre for Assessment client you have worked with OR*
- 3) Your intention to refer a client to Centre for Assessment”*

A screenshot of this section of the Application form is provided below:



In addition, CfA directs consultants to read the document “CfA Directory of Consultants Guidance for Members.” The document may be downloaded directly from: <https://www.centreforassessment.co.uk/media/190197/directory-of-consultants-guidance-v2.pdf>.

Metadata for the resulting PDF document shows it was written by Richard Hamilton of CfA. The LinkedIn social media profile (<https://www.linkedin.com/in/richard-hamilton-522015162/>) for Hamilton reveals he is the Head of Business Development for CfA. This indicates the program was developed by CfA’s business development function, not anything related to accreditation compliance.

The Guidance for Members document goes on to describe how CfA will offer discounts to the clients of “Member” consultants. These discounts include “10% discount to your clients on initial audits, from list price” and “15% discount to your clients on in-house or open training courses.”

A screenshot of the benefits paragraph from the Guidance document is reproduced below:

Membership Benefits

Through the *Directory*, we want to ensure that you feel connected to us and that we maintain regular, effective communication with you. Becoming a member of our *Directory of Consultants* will allow you to submit content for an individual member page on our website. Visitors to our *Directory* will be able to search for members by sector, Standard and location, and then make an enquiry with a member via an online form.

In addition to the listing in our *Directory*, we are currently offering the following additional benefits.

- Use of the members' logo on your website, business cards etc.
- 10% discount to your clients on initial audits, from list price
- 15% discount to your clients on in-house or open training courses
- 20% discount on CfA training undertaken by you
- Opportunity for your clients to take part in case studies
- Biannual catch-up call with a dedicated member of our BD team, including the opportunity to update your profile.

4. ALLEGATIONS & VIOLATIONS

Based on the evidence presented herein, Oxebridge alleges that CfA is operating a “pay to play” scheme in which consultants to submit referrals have their clients and themselves awarded discounts for certification audits and training by CfA, in violation of the overall rules for impartiality. Specifically, Oxebridge alleges that CfA is currently in severe breach of ISO 17021-1:2015 as follows:

- A. ISO 17021-1 Clause 4.2.3: By offering preferred consultant status to consultants who deliver or promise to deliver clients solely to it, CfA gives preferred treatment to those clients and violates the rule requiring that *“a certification body's decisions be based on objective evidence of conformity (or nonconformity) obtained by the certification body, and that its decisions are not influenced by other interests or by other parties.”*
- B. ISO 17021-1 Clause 4.2.4: By offering preferred consultant status to consultants who deliver or promise to deliver clients solely to it, CfA introduces significant threats to impartiality including a *“financial self-interest”* and a *“familiarity (or trust) threat.”*
- C. ISO 17021-1 Clause 5.2.3: By allowing its Business Development staff to create and market the preferred consultant program, CfA violated the requirement to not provide certification to any client where the *“relationship poses an unacceptable threat to impartiality.”*
- D. ISO 17021-1 Clause 5.2.7: By allowing its Business Development staff to create and market the preferred consultant program, CfA violated the requirement to not provide certification *“where the relationship between the consultancy organization and the certification body poses an unacceptable threat to the impartiality of the certification body.”*
- E. ISO 17021-1 Clause 5.2.9: By granting discounts specifically for certification audit services, CfA has violated the requirement that it *“certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides management system consultancy”* and that *“the certification body shall take action to correct inappropriate claims by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if the certification body were used.”*
- F. ISO 17021-1 Clause 5.2.11: Because the CfA preferred consultant program was developed by senior management, this shows that CfA failed to *“take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.”*

- G. ISO 17021-1 Clause 5.2.12: By the very nature of the CfA preferred consultant program, it shows that CfA has violated the requirement that it *“shall not allow commercial, financial or other pressures to compromise impartiality.”*
- H. ISO 17021-1 Clause 5.3.2: By the very nature of the CfA preferred consultant program, it shows that CfA has violated the requirement that it shall *“evaluate its finances and sources of income and demonstrate to the committee specified in 6.2 that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.”*
- I. ISO 17021-1 Clause 8.1.1: Oxebridge was unable to locate any publicly available procedure on the CfA website or other media related to its complaint handling rules, in violation of the requirement that *“the certification body shall maintain (through publications, electronic media or other means), and make public, without request, in all the geographical areas in which it operates, information about (e) processes for handling requests for information, complaints and appeals.”*

Oxebridge formally requests that CfA perform a proper and thorough investigation to identify the root cause of the problem identified herein, and to take corrective action. A copy of this complaint is being sent to your Accreditation Body, the IAF Regional Accreditation Body and the IAF itself, and the issue will be escalated to those bodies in the event that you do not properly respond, pursuant to IAF membership rules.

Respectfully,



Christopher Paris
VP Operations