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By Email

Dear Mr Paris

225611 – Complaint regarding BSI

I am writing to confirm the outcome of the UKAS investigation into your complaint which you raised with us on 12th February 2014.

As detailed in our acknowledgement of your complaint, UKAS is required by the international accreditation standard ISO/IEC 17011:2004 to have in place with all our accredited bodies an agreement to maintain as confidential information gained by us during the course of the accreditation process. As a consequence we are not permitted to disclose confidential information about a particular CAB (conformity assessment body) to a third party. Our response is, therefore, provided within the constraints of this requirement.

The UKAS investigation was conducted via two on-site assessments (the second being an additional visit over and above our normal assessment programme, which BSI accommodated at our request so UKAS could ensure that we had sufficient time available to conduct a full and comprehensive investigation). Our assessment activities focussed on the points you identified as areas of concern in your original letter of complaint to us. The assessments involved file reviews, interviews and a number of vertical audits. A number of items of marketing collateral were also reviewed in the course of this assessment. I trust this provides confidence to you with regards to the rigour shown in managing your complaint.

During the aforementioned investigation UKAS specifically investigated the 7 points raised by you in your letter of complaint and have concluded the following:

- **Allegation 1: BSI violated clauses prohibiting the provision, or marketing, of consulting services alongside conformity assessment services.** The investigation has concluded that the sale and provision of the Entropy® software does not constitute consultancy. However, it has been identified that certain aspects of the marketing of the Entropy® product as it appeared on the BSI Group website may have caused confusion in the market place with regards to the services which are being offered. This issue has been discussed in detail with BSI Assurance UK Limited (as the legal entity we accredit) and actions have been agreed with them. These will be subject to on-going review by UKAS.

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- **Allegation 2: BSI failed to identify threats to impartiality, properly investigate, document, research and mitigate any conflicts of interest.**
 The investigation concluded BSI Assurance UK Limited have suitable mechanisms in place to demonstrate they actively identify threats to the impartiality of their certification service and keep this under regular review in accordance with ISO/IEC 17021:2011 requirements. The continuing rigour and robustness of this process will be kept under review in subsequent UKAS assessment activities.
- **Allegation 3: Conflict of Financial self-interest arising from provision of both Entropy® and conformity assessment services.**
 The investigation concluded that there was suitable and appropriate separation achieved through the organisational structure of the BSI Group to prevent a situation arising where financial self-interest could compromise the impartiality of the certification process. The investigation reviewed the output from a number of certification audits (for both Entropy® and non-Entropy® users) and no difference in the level of rigour was observed.
- **Allegation 4: The Entropy® Internal Audit module provides a client audit programme developed by BSI.**
 The investigation concluded that the Entropy® Internal Audit module did not go any further than provide a template framework for an audit programme.
- **Allegation 5: BSI has created a confusing marketing environment.**
 The investigation concluded that some of the marketing collateral placed in the public domain by the BSI Group may have caused confusion with regards to the services being offered. This issue has been discussed in detail with BSI Assurance UK Limited and a number of actions have been agreed with them and will be subject to on-going review by UKAS.
- **Allegation 6: Marketing regarding “simpler, easier, faster or less expensive”**
 The investigation concluded that some of the marketing collateral placed in the public domain by the BSI Group (of which BSI Assurance UK Limited is a part, albeit as a separate legal entity) may have caused confusion. This issue has been discussed in detail with BSI Assurance UK Limited and a number of actions have been agreed and will be subject to on-going review by UKAS.
- **Allegation 7: Providing Conformity Assessment to users of a consulting service**
 As identified for allegations 1 and 2 above, the investigation concluded that the sale and provision of Entropy® software by BSI Group does not constitute consultancy and there was suitable and sufficient separation achieved through the organisational structure of the BSI group to prevent a situation arising that could compromise the impartiality of the certification service/process provided by BSI Assurance UK Limited as the entity providing certification services.

In addition to the 7 specific points raised in your complaint we noted that you felt that BSI Assurance UK Limited had failed to address your specific allegations, as evidenced in their response to you. As a consequence of this comment UKAS did include as part of its investigation a review of BSI Assurance UK Limited's complaint mechanisms. From this assessment we can confirm that BSI demonstrated they had conducted a thorough review of their activities in light of each of your allegations and detailed records of their investigation and conclusions were seen in the course of our assessment work and found to be in accordance with requirements.

In conclusion UKAS is satisfied that BSI Assurance UK Limited continues to meet the requirements of their UKAS accreditation. However, as detailed in this response UKAS has identified areas requiring improvement. These have been discussed in detail with BSI Assurance UK Limited and actions are underway. The effectiveness of

these will be monitored by UKAS as part of its on-going assessment programme for this organisation.

Finally, UKAS would like to thank you for bringing your concerns to our attention and for your patience during the investigation process. We consider that no further action is required at this time.

Yours sincerely



Nigel Overton
Accreditation Manager (Certification)