

ASSESSMENT PROCESS OF BEE VERIFICATION AGENCY

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1. Purpose and Scope

The purpose of this document is to describe the general principles for the assessment of SANAS BEE Verification Agency. This document outlines how SANAS plans and conducts assessment, surveillance and re-assessment visits to BEE Verification Agency accredited to R47. Assessments are on a four-year cycle for BEE Verification Agency.

2. Definitions and References

SANAS QM SANAS A01	SANAS Quality Policy Manual References, Acronyms and Definitions
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3. Accreditation

SANAS accreditation is official recognition that a Verification Agency is competent to perform verifications and also has a documented Verification System/Processes in place. An accredited Verification Agency will have demonstrated through formal assessment that it is competent to perform verifications.

It is SANAS' policy to define the scope of Verification Agency's accreditation as precisely as possible. Verification Agencies will therefore be asked to specify in detail the scope and the locations at which these activities are to be carried out; this scope will be agreed as far as possible before the assessment in order to determine the extent of the assessment activities.

SANAS uses technical assessors and/or experts with the relevant specialist knowledge to judge the competence of the BEE Verification Agency to perform the verification for which accreditation is sought. The assessment team are required by SANAS to maintain confidentiality, and to sign a confidentiality form specifying the need to declare any potential for conflict of interest. Their activities will be confined to assessing the BEE Verification Agency for compliance with the requirements and reporting their findings to the Verification Agency and to SANAS.

4. Application

- 4.1 On receipt of an application for accreditation (SANAS form F 14); SANAS will forward the application to the Field Manager responsible for the specified accreditation process. The Field Manager will:
- (i) contact the Verification Agency, directly or through the SANAS Accreditation Administrator,
 - (ii) review the application form for completeness;
 - (iii) confirm the different locations from which the Verification Agency is managed and the activities that are carried out at each of these.
- 4.2 Prior to any work being carried out, SANAS will provide the organisation with a quotation. Acceptance of the quotation will be required to proceed to the next stage of the assessment process.
- 4.3 The Verification Agency's documentation will be reviewed for compliance with R47 and relevant Requirements and Guidance documents. A report will be issued to the Verification Agency on completion of the document review. The report will comment on any non-conformances or areas, which are not addressed, areas where actions are needed and where there is concern or weaknesses are indicated and also the time period allowed for their correction. The Lead Assessor shall use the appropriate checklist as a guide in reviewing the quality documentation.

5. Pre-assessment

- 5.1 A pre-assessment is compulsory for Verification Agencies. The pre-assessment is carried out at the central office of the Verification Agency to:
- 5.1.1 discuss any findings related to the documentation;
 - 5.1.2 seek further information on the verification system;
 - 5.1.3 briefly examine the systems which have been established and implemented;
 - 5.1.4 discuss any arrangements which have been made to include multiple locations and outsourced verifications;
 - 5.1.5 determine whether any further technical assessors will be required.

The pre-assessment visit will normally be completed within one day.

- 5.2 After pre-assessment, the Verification Agency may need to make changes to its policies, procedures and programmes prior to SANAS acknowledgement that the organisations' documented system complies with the requirements of R47.

6. Assessment

6.1 Prior to assessment

- 6.1.1 An assessment schedule and a quotation will be forwarded to the Verification Agency in advance of the assessment; written acceptance of the quotation will be needed before a visit can be undertaken.
- 6.1.2 The time required for assessment, surveillance and reassessment will dependent on the complexity of the organisation, the geographical spread of its activities, the structure of the verification system and the proposed scope of accreditation.

6.2 Initial Assessment

The following elements will be covered:

- 6.2.1 central office assessment;
- 6.2.2 assessment of multiple locations (however named and where applicable);
- 6.2.3 witnessing of verifications.

Note: Witnessing is a mandatory requirement for an initial assessment.

6.3 Central Office Assessment

- 6.3.1 The SANAS assessment team will seek to establish through objective evidence and by using various techniques that:
 - 6.3.1.1 the verification system is appropriate to the Verification Agency's needs, organisational arrangements and methods of operation, including multiple location operations and number of verification analysts;
 - 6.3.1.2 all of the requirements of R47 and/or the relevant technical regulation applicable verification have been satisfactorily addressed;
 - 6.3.1.3 the Verification Agency has implemented all the requirements of the verification system effectively;

6.3.1.4 the operational, administrative and technical procedures used to support the policy manual are complete, valid and appropriate.

6.3.1.5 The following techniques will be employed to establish that procedures are being correctly and fully implemented:

- (a) interviews of management and staff who have an involvement in verifications;
- (b) examination of records;
- (c) examination of the arrangements for exercising control over outsourcing;
- (d) competence of verification analysts and verification managers.

6.4 The report and recommendation

6.4.1 A summary report F04 will be provided to the Verification Agency at the time of the assessment. Where corrective action by the Verification Agency is required, a maximum of **25** days for corrective actions classified as **minor** or **major** will be allowed for provision of evidence that the action has been carried out. In most cases evidence can be provided by post/fax although there may be situations where additional visits to the verification agency will be required. SANAS will review the evidence provided and decide upon its acceptability.

6.4.2 On completion of all actions, including those arising from visits to multiple locations and witnessing verification analysts, fees paid, the verification agency will be granted accreditation and a SANAS Certificate and Schedule of Accreditation will be issued.

6.5 Multi-site Verification Agencies

6.5.1 On application, the verification agency must indicate the number and range of locations being operated. All locations will be visited during the initial assessment, thereafter, SANAS will visit selected locations taking into account:

- (a) the results of internal audits from central office and locations;
- (b) the results of management reviews;
- (c) variations in the size of locations;
- (d) complexity of the verification system;
- (e) complexity of the locations.

6.5.2 SANAS will seek to establish through objective evidence and by using various techniques that:

- (a) all locations are operating under the same quality system, all locations are included in the internal audit programme and management review process.
- (b) During the central office assessment SANAS may need to see records of activities, which are being carried out at different locations.

6.5.3 If SANAS observes non-compliances at the central office or at any one of the locations of an organisation with multiple locations, the corrective action procedure shall apply to all locations where applicable. In the event that the results of any of the assessments of 'sample locations' reveal that there is a significant weakness or inconsistency in the application of the quality system, SANAS will review the assessment programme and may increase the number of locations to be assessed.

6.5.4 Failure by one location to comply with SANAS requirements may lead to removal of the location from the schedule of accreditation. If the cause of non-compliance is the lack of central control then the corporate accreditation will be the subject of review by SANAS and may lead to suspension or withdrawal of accreditation from all locations.

6.5.5 Generally, each location from which an organisation is operating will be visited at least once during the assessment cycle.

6.5.6 SANAS must be advised of any changes to location addresses and activities.

6.6 Witnessing of a verification

6.6.1 When deciding on the number of witnessing of verifications needed, the following aspects will be considered by SANAS:

- (a) the verification agency's procedures for selecting, training, authorising and monitoring verification analysts and the qualifications and experience required;
- (b) the locations from which verification analysts operate;
- (c) the extent to which verification analysts are required to exercise professional judgement.

6.6.2 When deciding on which verification analysts will be witnessed, account will be taken of:

- (a) new recruits or new authorisations;
- (b) qualifications and experience;
- (c) location.

6.6.3 Where there is any evidence, which casts doubt on the competence of Verification Analysts, the sample size of verification analysts assessed on site may be increased. This witnessing will be arranged at a mutually acceptable location.

6.6.4 SANAS assessors will ensure that their role during witnessing of verifications is one of observer and they will not influence the verification being performed. The team will be looking to see that as a minimum:

- (i) the verification analyst has the competence for the verification performed;
- (ii) the verification analyst's competence is consistent with the records;
- (iii) the verification analyst has been supplied with all necessary documented verification methods and procedures;
- (iv) the procedures are up-to-date;
- (v) the verification analyst implements the procedure in full and correctly i.e. no short-cuts, no personalised application where it is not permissible to do so;
- (vi) records of all observations are made while on site as required by the procedure;
- (vii) records clearly identify what has been verified, using what method/procedure, and when;
- (viii) all records are signed/initialled, stamped, as applicable;
- (ix) all findings that indicate immediate or urgent action are reported as required to the client whilst on site;
- (x) reports comply with the BBEE Codes of Good Practise.

7. Surveillance

7.1 General

7.1.1 Following accreditation, SANAS will check for continuing compliance with SANAS requirements by carrying out surveillance visits to Verification Agencies, initially six (6) months after accreditation and then annually, with a reassessment at 42 months.

7.1.2 The level of sampling of locations and inspectors will depend on performance over the assessment cycle, the extent of any changes, which have taken place, and the level of confidence, which can be placed in the performance measures, and control systems of the Verification Agency.

7.2 Surveillance visits

7.2.1 Surveillance visits shall be planned to cover the whole of the schedule of accreditation over assessment cycle. Any revisions to the verification

systems/processes will be reviewed during these visits. Extensive changes may require additional assessment time.

7.2.2 A summary report F04 will be provided to the Verification Agency at the time of the assessment. Where corrective action by the Verification Agency is required, a maximum of **25** days for corrective actions classified as **minor** or **major** will be allowed for provision of evidence that the action has been carried out. In most cases evidence can be provided by post although there may be situations where additional visits to the Verification Agency will be required. SANAS will review the evidence provided and decide upon its acceptability.

7.3 Multi-site organisations

7.3.1 The central verification system/processes will be subject to surveillance each year. It is anticipated that, in addition to the central office, at least one location will be visited each year, with a visit to each location generally taking place over the assessment cycle. However, the level of sampling of locations will depend on performance over the assessment cycle, the extent of any changes which have taken place and the level of confidence which can be placed in the performance measures and control systems of the Verification Agency.

8. Re-assessment

Reassessment visits will involve a comprehensive re-examination of the Verification Agency's verification system/processes and verification activities and will be similar in format and content to the initial assessment.

9. Extensions to scope (Gazetted charters as per section 9 of the Act)

9.1 Following receipt of an application for extension to scope, SANAS will determine whether or not there is a need for a central office and/or location assessment and/or witnessing of verification to take place. Factors which will be taken into consideration will be the:

- (a) the difference between the charter and the BBBEE Codes of Good Practise;
- (b) verification analysts' competencies;
- (c) the location at which the extension to scope is sought.

Where possible and desirable, any additional work will be carried out at the next surveillance or reassessment visit; where necessary, additional visits will be arranged. The estimated effort required for subsequent surveillance and reassessment will be reviewed and may be revised.

10. Scope of accreditation

Following successful assessment, the scope will be identified on the Accreditation Schedule. The Schedule is considered to be in the public domain and will form the basis of SANAS publication *Directory of Accredited Verification Agencies*.

11. Timescale for Accreditation Process

SANAS makes every effort to ensure that all applications are processed as efficiently as possible. The time taken to process an application depends on a number of factors some of which are outside the control of SANAS. The timing is dependent on:

- (a) The quality of the applicant's documentation and the extent to which it complies with SANAS requirements. A delay can occur due to insufficient documented procedures and submission of inadequate Policy Manuals;
- (b) The availability of suitable assessors;
- (c) The level of implementation of the system and available evidence of competence;
- (d) How efficiently the Verification Agency clears the non-compliances after the initial assessment;
- (e) The availability of the resources within SANAS.

Generally accreditation takes between 3 - 6 months from receipt of the application form with documented policies, systems, programmes, procedures and instructions that are compliant to R47.

12. Complaints, Appeals

Complaints and appeals will be handle in accordance with the SANAS procedure P12.

13. Obligations and Duties of Accredited organisations

The obligations and duties of a Verification Agencies are captured in the SANAS regulatory document R 05. All applicant organisations needs to familiarise themselves with the content of this document.

14. Suspension of accreditation

The SANAS procedure R51 captures suspension and reinstatement accreditation.

ADDENDUM 1**AMENDMENT RECORD**

<u>Proposed by</u>	<u>Section</u>	<u>Change</u>
<u>C Leballo</u>	<u>5.3 and</u> <u>5.4</u>	Deleted – still making reference to statement 020