CONTROL OF ENTITIES OPERATING ON BEHALF OF ACCREDITED MANAGEMENT SYSTEMS CERTIFICATION BODIES

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FURTHER INFORMATION

For further information on this document or other Global Accreditation Cooperation Incorporated (Global ACI) documents, contact the Global ACI Secretariat.

Email: secretariat@global-aci.org

Phone: +1 (571) 569-2614

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0. PREAMBLE

0.1 Purpose

0.1.1 This document sets out the mandatory requirements for the control of entities operating on behalf of accredited management systems certification bodies.

0.1.2 This document is based upon the IAF (International Accreditation Forum) document IAF MD 23:2023 *Control of Entities Operating on Behalf of Accredited Management Systems Certification Bodies*. On the transfer of the role of IAF to the Global Accreditation Cooperation Incorporated (Global ACI), the text has been reformatted to be a Global ACI document without any substantive change to the text.

0.2 Scope

0.2.1 This document relates to entities, performing and/or managing management system certification activities, on behalf of certification bodies (CBs) holding accreditation, which are not wholly or partly owned or employed by the CB. The entities may or may not be located in the same country as the CB head office and may be a representative, agency, franchisee or sales office of the CB or any entity which has a contractual relationship with the CB for performing certification activities.

0.2.2 Normative references:

- ISO/IEC 17011:2017 – Requirements for accreditation bodies accrediting conformity assessment bodies
- ISO/IEC 17021-1:2015 – Requirements for bodies providing audit and certification of management systems -- Part 1: Requirements

0.2.3 The term “should” is used in this document to indicate recognised means of meeting the requirements of the standard. A Conformity Assessment Body (CAB) can meet these in an equivalent way provided this can be demonstrated to an Accreditation Body (AB). The term “shall” is used in this document to indicate those provisions which, reflecting the requirements of the relevant standard, are mandatory.

1. OBLIGATIONS OF CERTIFICATION BODIES

1.1 Risk Assessment of Candidate Entities

1.1.1 Prior to entering any agreement, the CB shall perform a comprehensive risk assessment on the candidate entity in the country in which it is located and in the countries in which it will be operating on behalf of the CB. If it identifies an unacceptable risk that is not manageable, the CB shall not proceed with the agreement.

1.1.2 The risks shall be considered with regard to impartiality, competence, consistency, independence, and levels of local risk to certification business in the country where the CB is planning for the entity to operate. (See Annex 1.) Existing accreditation of the entity can be taken into account.

1.2 Establishment of the Legally Enforceable Agreement

1.2.1 The CB shall establish a legally enforceable agreement with the candidate entity to include but not be limited to:

i) That the candidate entity shall conform to the applicable requirements including legal status, impartiality, competence requirements, process requirements and with the CB's management system, to the extent that the candidate entity is involved in the delivery of certification services.

- The candidate entity shall operate within the CB's management system and/or under its own accreditation.
- As needed, based on the risk assessment, additional controls shall be defined and implemented.

ii) The entity is subject to audit by the CB on an ongoing basis. The audits shall include all activities performed by the entity on behalf of the CB. The audit frequency and methodology shall depend on the risk assessment and the results of previous audits.

iii) Mandatory annual reporting on key performance indicators (KPIs), including those specified in Global ACI-TECH-3-012 *Mandatory Document for the Collection of Data to Provide Indicators of Management System Certification Bodies' Performance*.

iv) Provision of access to control and monitoring by the CB's AB as deemed necessary.

v) Details of the activities to be provided by the entity.

vi) Responsibilities, authority and liability of each party.

vii) Provision of resources, training, continuous professional development.

viii) Intellectual property and protection.

ix) Before outsourcing any activities it performs on behalf of the CB, the entity shall obtain the agreement of the CB.

1.2.2 CBs shall report to their ABs all established entities' operations and the markets in which they operate.

1.2.3 In cases of termination of the agreement, the CB shall inform its AB with the reasons of termination.

1.3 Compliance of Entities' Operations with the Applicable Requirements and the CB Management System and Governance Documents

1.3.1 The requirement to conform to the applicable accreditation requirements is extended to the entity, in relation to the services it performs on behalf of the CB.

1.3.2 CBs shall monitor the ongoing performance of the entity, including internal audits, (including witnessing audits that may include on-site, remote or a combination of methods) of the entities to the relevant accreditation requirements of the CB's management system, the CB's Governance Documents and other applicable documents in relation to the activities performed on behalf of the CB.

2. OBLIGATIONS OF ACCREDITATION BODIES

2.1 AB Monitoring of Entities

2.1.1 When an AB is notified that such an entity is to be used by a CB, the AB shall share this information (clause 7.8.1 of ISO/IEC 17011) with local AB(s) and may seek their inputs taking into account the requirements of clause 8 of ISO/IEC 17011.

2.1.2 Local ABs shall identify, when it comes to their attention, entities, accredited by foreign ABs, operating in the local market and communicate this information to the foreign AB.

2.1.3 The CB's AB shall decide on an assessment program of its entities in accordance with the requirements of ISO/IEC 17011, Global ACI-TECH-3-009 *Accreditation Assessment of Conformity Assessment Bodies with Activities in Multiple Countries,* and other applicable documents and shall inform the local AB if applicable.

2.1.4 The CB's AB shall inform the local AB of cases of termination of the agreement between the CB and the entity for fraudulent or unethical behaviour.

2.2 AB Assessment of Entities' Operations

2.2.1 ABs shall determine the frequency of assessment for each CB and its entities in an accreditation cycle based on the requirements of ISO/IEC 17011 and the applicable Global ACI documents.

2.2.2 The CB's AB may initiate assessments of entities to investigate specific situations triggered by adverse trends (including the indicators that are required to be identified by the entities and the CB and reported on a regular basis to the AB) or market feedback, such as:

- A sudden change in the number of certificates issued by the CB.
- The entity raises few or no nonconformities during a long period of time, for example over a certification cycle, if the entity is performing audits.
- Situations that call into question the credibility of accredited certification.
- Complaints from customers of certified organisations or other interested parties indicating concerns about the effectiveness of an entity's certification process.
- Negative publicity: i.e. issues raised by media organisations regarding a particular product, organisation or entity, with relation to specific technical areas; problems identified through social networking sites; specific negative feedback from NGOs regarding the performance of accredited certification.
- Intervention from regulators, or negative feedback from regulators.

- The raising of systemic issues and concerns by the entity during witnessed assessment by the AB for a client when no such findings were recorded in earlier audits of the same client, especially by the same auditor/team.

- Evidence that regulatory requirements, especially in regulation-sensitive management systems such as FSMS, EMS or OHSMS, are not adequately audited, particularly if there is a direct impact on people's health or safety.

Note: Annex 2 can be used to assist the investigation of such situations.

2.2.3 In the event of poor performance by the entity (which can be triggered by complaints from local ABs, regulatory bodies or other stakeholders, poorly maintained records, non-effective training and evaluation of local staff, etc.), an AB may need to change the assessment program of the CB, e.g., by programming additional special assessments that may include on-site, remote or a combination of methods.

2.2.4 Information related to poorly performing entities shall be shared with the local AB, and its cooperation requested for any subsequent action, with the agreement of the CB.

3. AMENDMENT TABLE

Section	Previous Version	Summary of Changes
All	-	Initial issue of Global ACI document

ANNEX 1: ELEMENTS THAT CAN BE CHECKED DURING THE RISK ASSESSMENT (INFORMATIVE)

Elements that can be checked during the risk assessment include but are not limited to:

– Ownership and owners and their relationships (business and other).

– Related businesses, including relationships with consulting companies.

– Criminal records of owners and entity - clean records.

– Potential issues with authorities, violations, acts, bans, tax records, social security records.

– Former relations with other CBs, if any, current status, reasons for termination of relationships.

– Number of employees on record, including external resources.

– Scopes of competence of auditors, auditor files, current contracts.

– Financial stability.

Note: The local AB may be a source of information.

ANNEX 2: TOOLSET FOR SPECIAL INVESTIGATIVE ASSESSMENT OF ENTITIES' OPERATIONS (INFORMATIVE)

If a special investigative assessment is necessary, below is a recommended list of topics that can be checked to assess the evidence for conformity of entities' operations:

– Legal information, registration, ownership, legal records of company and owners/managers.

– Other types of activity performed by the entity.

– Related entities through common ownership and links between owners.

– Management structure and management of conflict of interest.

– Tax and social security information and correspondence with volume of work.

– Auditor resources - evidence of their existence and their demonstrated competence.

– Financial aspects.

– Cross-check of dates of audits and hard evidence for the presence of the auditors (for example that travel receipts, hotel invoices, payment details do not overlap with other audits).

– To confirm with clients the presence of audit teams, audit days, length of audits, etc.

– Actual state of the company.

– Check rates against direct costs.

– Check for large consulting subcontractors - large amounts paid to subcontractors; payments to auditors, contracts with auditors, payments to companies to do audits.

Other topics for checking may be added, as required.