



## ControlCase Certification Process

### Revision History

Sr. No.	Date of Revision	Ver	Description of Change	Author	Reviewed By / Date	Approved By / Date
1	3/11/2019	1.0	Draft	Mark Smith	Satya Rane 12 Mar 2019	Norm Laudermilch 13 Mar 2019
2	3/15/2019	1.1	Update Draft	Mark Smith	Satya Rane 16 Mar 2019	Norm Laudermilch 17 Mar 2019
3	3/20/2019	1.2	Review	Mark Smith	Satya Rane 22 Mar 2019	Norm Laudermilch 22 Mar 2019
4	20 April 2020	1.3	Minor edits	Mark Smith	Mark Smith 20 April 2020	Norm Laudermilch 20 April 2020
5	30 Nov 2020	1.5	Minor edits	Mark Smith	Norm Laudermilch 22 Dec 2020	Ricardo Pardo 22 Dec 2020
6	28 Dec 2020	1.6	Minor Edits	Mark Smith	Norm Laudermilch 5 Jan 2021	Ricardo Pardo 5 Jan 2021
7	08 Nov 2022	1.7	Minor Edits	Giridhar C	ISO Team 11 Nov 2022	Ricardo Pardo 11 Nov 2022
8	14 Feb 2023	1.8	Revised based on RvA audit findings	Giridhar C	ISO Team 16 Feb 2023	Ricardo Pardo 20 Feb 2023
9	12 Jul 2023	1.9	Revised based on ANAB DR findings	Giridhar C	ISO Team 12 Jul 2023	Omkar Salunkhe 14 Jul 2023





**Contents**

Introduction..... 4

Scope ..... 4

Application for Certification ..... 4

Application Review ..... 5

Accept / Decline Application ..... 6

Submission of Proposal & Certification Agreement..... 6

Criteria for Certification..... 7

Communication of Changes to the Criteria ..... 7

Certification Decision ..... 8

    Complaints..... 18

    Appeals: ..... 21

    Complaints:..... 23

    Disputes: ..... 24

    Addressing All Appeals, Complaints, and Dispute at Risk Management Level: ..... 24

Disclaimer ..... 25



## Introduction

This document defines the procedure that must be followed by applicant organizations seeking Certification based on the requirements of relevant management system standards. ControlCase, on request, will provide any specific information required by the applicant organization.

The other applicable procedures and information that are mandatory for the new applicant, like Certification scheme, Appeals and dispute procedure, etc., are provided along with the application pack.

## Scope

This procedure applies to ControlCase channel 1 service groups and all support staff.

Channel 1 Services groups for ISO certification are CC Assessments LLC for the Americas and Europe regions and CC InfoSec IPL for all other regions. Channel 1 Services groups for NIST and FEDRAMP assessments are the Federal Group.

This document refers to and complies with the relevant sections of the CC-Quality Manual.

## Application for Certification

The ControlCase shall require the client organization to have documented and implemented ISMS/PIMS/BCMS, which conforms to ISO/IEC 27001, 27701, and/or 22301 and other documents required for certification.

The ControlCase shall have documented procedures for:

- a. The initial certification audit of a client organization's ISMS/PIMS/BCMS, by the provisions of ISO/IEC 17021-1:2015 and other relevant documents.
- b. Surveillance and recertification audits of a client organization's ISMS/PIMS/BCMS by ISO/IEC 17021-1:2015 periodically for continuing conformity with relevant requirements and verifying and recording that a client organization takes corrective action on a timely basis to correct all non-conformities.

ControlCase provides certification services to organizations established as legal entities in multiple countries. The organizations applying for certification are expected to be registered entities per applicable laws within their country.



Any exception regarding legal status would be made only by a specific decision of ControlCase, keeping in view the legal provisions in the economy where the organization is established as a legal entity.

Organizations interested in obtaining certification from ControlCase for their management system can send a request to ControlCase. Upon receipt of the request, ControlCase will forward the application package to the applicant.

Any additional explanation needed by the applicant will be provided on receipt of a specific request for the same, including necessary explanations on the particular schemes and scope of accreditation.

Before applying for certification, the applicant organization must have met the following conditions:

- Implement the management systems for at least three months. This is necessary to assess the ability of the organization to carry out the process as per the documented management system.
- Carried out a minimum of one management review for the documented management system prepared per the relevant management system.

During the certification Kickoff phase, the completed Client information form for certification must be duly signed by the authorized representative/s of the applicant organization seeking certification and forwarded to ControlCase along with the necessary documents. ControlCase reserves the right to seek information on the concerned personnel before accepting the application for further processing.

The information gathered from the application is used for the preparation of on-site assessments, where required, and is treated with appropriate confidentiality. This information enables evaluation of the nature of the Organization's business and the activities that support it.

## Application Review

Before proceeding with the audit, ControlCase will conduct a review of the application (or) tender and supplementary information for certification to ensure that:

- The information about the applicant organization and its management system is sufficient for the conduct of the audit.



- The requirements for certification are clearly defined and documented and have been provided to the applicant organization.
- Any known difference in understanding between ControlCase and the applicant organization is resolved; and communicated to the organization.

ControlCase has the competence and ability to perform the certification activity with respect to the scope of certification sought, the location(s) of the applicant organization's operations, the time required to complete audits, and any other points influencing the certification activity are considered (language, safety conditions, threats to impartiality, etc.).

Records of the justification for the decision to undertake the audit are maintained.

## Accept / Decline Application

Following the application review of the application, ControlCase will either accept or decline an application for certification. The adverse decision of ControlCase would be communicated with reasons for rejecting the application. Documentation will be maintained related to adverse decision client cases for record-keeping purposes.

## Submission of Proposal & Certification Agreement

ControlCase will submit a signed, legally enforceable agreement with the applicant covering all sites which are part of the scope of certification. Based on the information provided by the applicant, the Support staff of the Business Development / Admin team will prepare a proposal and send it to the applicant organization along with the Certification Agreement where ControlCase specifies the requirements for the certification.

In the case of tenders, upon receiving the Letter of Acceptance from the client, the full information is reviewed, and additional information is sought for exact estimation of man-days and competence.

Further application processing shall be taken up upon acceptance of the proposal and confirmation that the "Certification agreement" is acceptable. Upon acceptance of the ControlCase proposal, the applicant organization must submit the "Certification Agreement" duly signed.



Upon receipt of the 'Certification Agreement,' ControlCase will provide portal access to the applicant organization. Necessary information like usernames and passwords will be communicated to the concerned persons of the applicant organization.

Client needs to upload their relevant management system documents in the portal for review by ControlCase auditors. The adequacy of the management system documentation, with respect to implementation, is reviewed, and if found deficient, appropriate comments are communicated to the auditee through the GRC Portal.

## Criteria for Certification

Upon completing the certification activities, clients shall be provided with a Certification of Registration. This document shall provide unambiguous information related to the organization's certification, including the scope of the certification being granted, the audit criteria (Standard or other normative documents), and the certification's validity period (see Certificate Production Process).

ControlCase will perform accredited ISO 27001:2013 audits of its clients in line with IAF MD 26 as well as relevant accreditation body policy on the transition to ISO 27001:2022.

The ControlCase shall provide to each client organization whose ISMS/PIMS/BCMS has certified certification documents such as a letter or a certificate signed by an officer assigned such responsibility. For the client organization and each of its information systems covered by the certification, these documents shall identify the scope of the certification granted and the ISMS/PIMS/BCMS standard ISO/IEC 27001, 27702, and/or 22301 to which the ISMS/PIMS/BCMS is certified. In addition, the certificate shall include a reference to the specific version of the Statement of Applicability.

ControlCase shall adopt and document the Certification criteria for the organization based on relevant management system standards (e.g., NIST 800-53, ISO 27001, ISO 27701, ISO 22301, PCI DSS V3.2.1, etc.) and any other documents required for certification relevant to the function performed.

## Communication of Changes to the Criteria

Any change in the criteria shall be notified to the client by registered mail/email or other means. A suitable time frame shall be given for implementing the modified criteria. Any transition policy announced by the accreditation body would be adopted by ControlCase and communicated to the certification clients. The client shall communicate their objection, if any, acceptance in writing by registered mail/email or other means within 30 days of receipt of the amended criteria. If the communication is received within 30 days, it will be presumed that the client is willing to adopt the changed criteria.



Implementing the changed criteria shall be verified during the assessment of each client. In the event of any major change in the criteria, ControlCase reserves the right to carry out an additional assessment.

Suppose a client is not willing to adopt the changed criteria. In that case, it can opt out of the certification, and the certificate is withdrawn from the date of the implementation of revised criteria.

All the ISMS clients of ControlCase have been communicated about the ISO/IEC 27001:2022 Transition Plan and related timelines to complete upgrading existing 2013 version certifications. If any of the clients fail to meet the deadlines mentioned in the transition plan in such case, the existing 2013 version certificate will be withdrawn after 31st October 2025.

ControlCase has legally enforceable arrangements to ensure that the certified client informs ControlCase, without delay, of matters that may affect the capability of the management system to continue to fulfill the requirements of the standard used for certification. These include, for example, changes relating to:

- a. the legal, commercial, organizational status or ownership,
- b. organization and management (e.g., key managerial, decision-making, or technical staff),
- c. contact address and sites,
- d. scope of operations under the certified management system, and
- e. major changes to the management system and processes.

## Certification Decision

ControlCase shall ensure that the persons or committees making the certification or recertification decisions differ from those who carried out the audits.

ControlCase shall confirm, before the certification decision, that:

- a. the information provided by the audit team is sufficient with respect to the certification requirements and the scope for certification.
- b. management reviews and internal ISMS/PIMS/BCMS audits have been implemented, are effective, and will be maintained.
- c. it has reviewed, accepted, and verified the effectiveness of correction and corrective actions for all nonconformities represented.
- d. failure to fulfill one or more requirements of the management system standard, or
- e. a situation that raises significant doubt about the ability of the client's management system to achieve its intended outputs.





- f. it has reviewed and accepted the client's planned correction and corrective action for any other non-conformities.

The criteria against which a client's ISMS/PIMS/BCMS are audited shall be those outlined in the ISMS/PIMS/BCMS standard explanation required for applying these documents to a specific certification program. Such an explanation shall be given by a relevant and impartial committee or people possessing the necessary technical competence and published by the ControlCase.

The documentation of the ControlCase shall include the policy and procedures for implementing the certification process, including checks of the use and application of documents used in the certification of ISMS/PIMS/BCMS s and the procedures for auditing and certifying the client organization's ISMS/PIMS/BCMS.

Team Leader makes a certification decision after completing the audit adequacy review and submits the report along with the supporting auditor notes and necessary documents to the technical reviewer for technical review process. Once technical review has approved the report, it is sent to the QA team.

The QA team reviews reports for accuracy, grammar, spelling, and compliance with ControlCase standards and policy. The report and associated information are returned to the audit team if non-conformity is found. The QA team coordinates remediation with the team leader and submits it to the Certification Decision Authority. QA maintains a record of all non-conformity issues.

If compliant, the certificate is created, and the report, certification decision letter, and certificate are submitted to the Certification Decision Authority for final review and approval. Certification Decision Authority comprehensively reviews the adequacy via Audit Report Adequacy Checklist and arrive at appropriate decision related to the certification.

Post Certification Decision Authority approval, the Audit Report, Certification Decision Letter, and Certificate and Customer Feedback Form are released to the client.

Decisions for granting, refusing, maintaining certification, expanding or reducing the scope of certification, renewing, suspending or restoring, or withdrawing certificates shall not be outsourced.

## Certificate of Registration

The certificate shall include the ControlCase logo, the Accreditation body logo (if Applicable), the name of the client, the address of the premises of the organization, the certificate number, the scope of certification, the Approval date of the certification, the issue date of the certificate and the date of expiry of the certificate.

The certificate shall be valid for at least one year, and the date of issue and validity is indicated on the certificate.



The original Certification date on the client's certificate will be maintained in case the certificate lapses for a time provided that:

- The current certification cycle is started, and the expiry date is indicated.
- The last certification cycle expiry date be indicated along with the date of the recertification audit.

## Granting of Certification

The certification is granted to an applicant on completion of the assessment of this procedure and after the applicant's organization has met the following conditions.

The applicant meets the certification criteria, and all non-conformities found against the certification criteria during assessment have been close to the satisfaction of ControlCase in accordance with the guidelines on the subject.

There are no adverse reports, information, or complaints with ControlCase about the applicant regarding the quality and effectiveness of the implementation of the certification system as per the criteria of ControlCase.

The customers of the applicant organization are satisfied with the product or services offered by the organization and its certification system. ControlCase may request feedback from selected client customers and seek feedback from stakeholders.

The Initial certification shall be for 1 to 3 years, depending on applicable regulations or standards.

ControlCase will issue accredited ISO 27001:2013 certificates to its clients in line with IAF MD 26 as well as relevant accreditation body policy on the transition to ISO 27001:2022. All such issued ISO 27001:2013 certificates will expire on 31<sup>st</sup> October 2025.

If any adverse issue arises from the reasons specified above, the applicant organization will be given an opportunity to explain its position in writing to ControlCase. The final decision shall be taken in respect of granting certification/permission to continue the certification based on facts and the results of such presentation by the Chief Risk Officer (CRO) and the QA Department Head.

ControlCase will issue accredited ISO 27001:2022 certificates to its clients only after receiving the necessary accreditation approvals from the relevant accreditation body.

## Maintaining Certification



ControlCase shall maintain certification based on the demonstration that the client continues to satisfy the requirements of the management system standard. It may maintain a client's certification based on a positive conclusion by the audit team leader without further independent review, provided that:

- a. for any nonconformity or other situation that may lead to suspension or withdrawal of certification, ControlCase has a system that requires the audit team leader to report to the ControlCase the need to initiate a review by appropriately competent personnel different from those who carried out the audit, to determine whether certification can be maintained, and
- b. competent personnel of the ControlCase monitors its surveillance activities, including monitoring the reporting by its auditors, to confirm that the certification activity is operating effectively.

The client shall comply with the following, individually or severally. Under these conditions, the certification given to the organization shall be maintained for three years.

The client continues to meet the certification criteria, and all nonconformities found against the certification criteria during surveillance assessment have been closed to the satisfaction of ControlCase as per the criteria.

There are no adverse reports, information, or complaints with ControlCase about the organization regarding the implementation of the system as per the criteria defined by ControlCase policy.

The organization's customers are satisfied with the product or services of the client.

If any adverse issue arises from the reasons specified above, the client shall be given an opportunity to explain its position in writing to ControlCase. The final decision shall be taken regarding the maintenance of the certification of approval on the basis of facts and the results of such presentation by the Head-ISO Group.

The ControlCase team manager ensures that audits are completed within the designated time windows and escalate to ISO Partner and COO if a customer's certification expires. Any other factor affecting the customer certification will be reported to the ISO partner and COO.

All the ISMS clients of ControlCase have been communicated about the ISO/IEC 27001:2022 Transition Plan and related timelines to complete upgrading existing 2013 version certifications. If any of the clients fail to meet the deadlines mentioned in the transition plan in such case, the existing 2013 version certificate will be withdrawn after 31st October 2025.

The team manager conducts a monthly review of customer audits and certification status.

## Conditions for Suspension and Restoration of Certification:



ControlCase shall suspend certification in cases when, for example, the client's certified management system has persistently or seriously failed to meet certification requirements, including requirements for the effectiveness of the management system, the certified client does not allow surveillance or recertification audits to be conducted at the required frequencies, or the certified client has voluntarily requested a suspension.

Under suspension, the client's management system certification is temporarily invalid.

ControlCase has enforceable arrangements with its clients to ensure that the client refrains from further promotion of its certification in case of suspension. ControlCase shall make the suspended status of the certificate publicly accessible and shall take any other measures it deems appropriate.

Failure to resolve the issues that have resulted in the suspension in a time established by ControlCase shall result in withdrawal or reduction of the scope of certification.

NOTE: Suspension status shall not exceed 6 months.

ControlCase shall reduce the client's scope of certification to exclude the parts not meeting the requirements when the client has persistently or seriously failed to meet the certification requirements for those parts of the scope of certification. Any such reduction shall be in line with the requirements of the standard used for certification.

ControlCase has enforceable arrangements with the certified client concerning conditions of withdrawal of the Certificate and ensuring the withdrawal of certification that the client discontinues its use of all advertising matter that contains any reference to a certified status.

Upon request by any party, ControlCase shall correctly state the status of certification of a client's management system as being suspended, withdrawn, or reduced.

The Certificate of Registration is suspended for a specified period based on the following conditions:

- The Organization requests suspension
- The certificate or logo of ControlCase is intentionally misused in any way. (the logo of ControlCase and the accreditation body cannot be used on test reports/certificates)
- The organization makes incorrect references to the certification status
- The Organization fails to conform to the agreed standard consistently
- The Organization fails to comply with the financial requirements of the agreement of certification
- The Organization undertakes actions that bring ControlCase into disrepute



- Any wilful misdeclaration in the application form
- Wilful non-compliance to the terms and conditions specified in the agreement
- Excessive and or serious complaints against the organization from interested parties
- Any other condition deemed appropriate by ControlCase

In such cases, a formal communication will be made to the Organization in which ControlCase specifies the citing intention to suspend the certificate and ask for remedial measures within 30 days.

The client shall be given an opportunity to explain its position in writing to ControlCase. The final decision shall be taken in respect of the suspension of the certificate of registration based on facts and the results of such presentation by the CRO and QA Department Head.

Suppose the above action does not result in any improvement. In that case, a registered (or equivalent) letter will be issued to the Organization indicating the conditions under which suspension has been affected and informing about the consequences of the suspension, like in case of the suspension period, the client refrains from the future promotion of the certification. The information on the certified status of the client will be made publicly accessible through the ControlCase website. If required, any other mode of publication may also be considered.

The Organization shall be responsible for taking prompt corrective action and informing ControlCase accordingly within the stipulated time, after which an audit or a visit may be planned to verify the requirements.

If the delay persists, in taking corrective actions even after persuasion, CRO decides to recall certificates and logos as applicable in the case of withdrawal.

ControlCase may remove the suspension and notify the Organization accordingly on fulfillment of indicated conditions within the stipulated time. Otherwise, the certification will be liable for withdrawal or cancellation.

The maximum period of suspension is six months unless for any specific reason extended by CRO, after which conditions for withdrawal apply.

Extension of the suspension period may be granted under situations wherein the client or ControlCase has sufficient reasons to justify the suspension period. Under no case will the extension of the suspension period exceed three months.

## Conditions for Withdrawal of Certification:



The Organization's certification will be withdrawn, and agreements cancelled in the following cases:

- When the conditions referred to in the “Condition for Suspension of Certification” para above exist, the Organization fails to take corrective actions under intimation to ControlCase.
- If the certification criteria are changed and the Organization either will not or cannot ensure conformance to the new requirements within the stipulated time.
- All the ISMS clients of ControlCase have been communicated about the ISO/IEC 27001:2022 Transition Plan and related timelines to complete upgrading existing 2013 version certifications. If any of the clients fail to meet the deadlines mentioned in the transition plan in such case, the existing 2013 version certificate will be withdrawn after 31st October 2025.
- In such cases, a formal communication will be made to the Organization and/or regulation/standard governing body in which ControlCase specifies the citing intention to withdraw the certification and ask for a response within 30 days.
- The client shall be given an opportunity to explain its position in writing to ControlCase and/or governing body. The final decision shall be taken in respect of the withdrawal of the certificate of registration on the basic facts and the results of such presentation by CRO, QA Department Head, and/or governing body for regulation or standard.
- This will be exercised by informing the Organization by a registered (or equivalent) letter followed by any other publication notifying the cancellation if required. This information will be made publicly accessible through the ControlCase website.
- An organization may dispute or appeal or complain against the decision of ControlCase, which will be dealt with as specified in the procedure.
- Once the Certificate of registration is withdrawn and if the Organization wishes to get the certification redone, ControlCase will complete a re-assessment.
- When withdrawal is finalized, the following actions are taken.
- The Organization will be advised by communication in writing (Letter, e-mail, fax, etc.) to return the Certificates along with the logo issued to them or give a confirmation that the certificates or logo issued are either made obsolete / withdrawn or prevented from any misuse.
- It will be suitably denoted or amended made in the “List Of certified Companies” published by ControlCase on the website as decided by CRO
- If an Organization makes a false claim as to certification by ControlCase, appropriate action is taken against such Organization, including corrective action, publication of the transgression, and, if necessary, other legal action.

CRO shall take all the decisions on Suspension, Extension of Suspensions, and Withdrawals



Upon request by any party, ControlCase will correctly state the status of certification of a client's management system as being suspended, withdrawn, or reduced.

## Conditions for Cancellation of Certification:

The Organization's certification will be cancelled, and agreements will be cancelled in the following cases at the Client's request.

This will be exercised by informing the Organization by a registered (or equivalent) letter followed by any other publication notifying the withdrawal if required. This information will be made publicly accessible through the ControlCase website.

Once the Certificate of Registration is cancelled and if the Organization wishes to get the certification redone, ControlCase will complete a re-assessment.

When cancellation is finalized, the following actions are taken.

- The Organization and/or governing body of regulation or standard will be advised by communication in writing (Letter, e-mail, fax, etc.) to return the Certificates along with the logo issued to them or give a confirmation that the certificates or logo issued are either made obsolete / withdrawn or prevented from any misuse.
- It will be suitably denoted or amended in the "List of certified Companies" published by ControlCase on the website as decided by CRO.

## Transfer of Certificate

The transfer of certification is defined as the recognition of an existing and valid management system certification granted by one accredited certification body (from now on referred to as the "issuing certification body"), by another accredited certification body (from now on referred to as the "accepting certification body") to issue its certification. Multiple certifications (concurrent certification by more than one certification body) do not fall under the definition above and are not encouraged by IAF.

Only certification covered by an IAF or Regional MLA signatory accreditation at level 3 and, where applicable, levels 4 and 5 shall be eligible for transfer. Organizations holding certification that is not covered by such accreditations shall be treated as new clients.

Only valid accredited certification shall be transferred. The certificate known to be suspended shall not be accepted for transfer.



In cases where certification has been granted by a certification body that has ceased trading or whose accreditation has expired, been suspended, or withdrawn, the transfer shall be completed within six months or on the certification's expiration, whichever is sooner. In such cases, the accepting certification body shall inform the accreditation body under whose accreditation it intends to issue the certificate before the transfer.

The accepting certification body shall have a process for obtaining sufficient information to make a certification decision and inform the transferring client of the process. This information shall, at minimum, include arrangements regarding the certification cycle.

The accepting certification body shall review the certification of the transferring client. This review shall be conducted using a documentation review and was identified as needed by this review; for example, if there are outstanding major nonconformities, it shall include a pre-transfer visit to the transferring client to confirm the validity of the certification.

Note: The pre-transfer visit is not an audit.

The accepting certification body shall determine the competence criteria for personnel involved in the pre-transfer review. One or more people may conduct the review. The individual or group performing the pre-transfer visit shall have the competence required for an audit team appropriate for the scope of certification being reviewed.

The review shall cover the following aspects as a minimum, and the review and its findings shall be fully documented:

- a. confirmation that the client's certification falls within the accredited scope of the issuing and accepting certification body.
- b. confirmation that the issuing certification body's accredited scope falls within its accreditation body's MLA scope.
- c. the reasons for seeking a transfer.
- d. The site or sites are wishing to transfer certification hold a valid accredited certificate. , the initial certification, the most recent recertification audit reports, and the latest surveillance report. The status of all outstanding nonconformities that may arise from them and any other available, relevant documentation regarding the certification process. Suppose these audit reports are not made public, or the surveillance recertification audit has not been completed as required by the issuing certification body's audit program. In that case, the organization shall be treated as a new client.
- e. complaints received and action taken.
- f. considerations relevant to establishing an audit plan and an audit program. The audit program established by the issuing certification body should be reviewed if available.
- g. any current engagement by the transferring client with regulatory bodies relevant to the scope of the certification in respect of legal compliance.

By clause 9.5.2 of ISO/IEC 17021-1:2015, the accepting certification body shall not issue certification to the transferring client until:





- a. it has verified the implementation of corrections and corrective actions in respect of all outstanding major nonconformities. and
- b. it has accepted the transferring client's plans for correction and corrective action for all minor non-conformities.

Where the pre-transfer review (document review and/or pre-transfer visit) identifies issues that prevent the completion of the transfer, the accepting certification body shall treat the transferring client as a new client. The justification for this action shall be explained to the transferring client and documented by the accepting certification body and the records maintained.

The normal certification decision-making process by clause 9.5 of ISO/IEC 17021-1:2015 shall be followed, including that the personnel making the certification decision different from those carrying out the pre-transfer review.

If the pre-transfer review identifies no problems, the certification cycle shall be based on the previous certification cycle. The accepting certification body shall establish the audit program for the remainder of the certification cycle.

NOTE: The accepting certification body can quote the organization's initial certification date on the certification documents indicating that the organization was certified by a different certification body before a specific date. Where the accepting certification body has had to treat the client as a new client because of the pre-transfer review, the certification cycle shall begin with the certification decision.

The accepting certification body shall decide on certification before any surveillance or recertification audits are initiated.

Cooperation between the issuing and accepting certification bodies is essential for the effective transfer process and the certification's integrity. When requested, the issuing certification body shall provide the accepting certification body with all the documents and information required by this document. Where it has not been possible to communicate with the issuing certification body, the accepting certification body shall record the reasons and make every effort to obtain necessary information from other sources.

The transferring client shall authorize the issuing certification body to provide the information the accepting certification body seeks. The issuing certification body shall not suspend or withdraw the organization's certification following the notification that the organization is transferring to the accepting certification body if the client continues to satisfy the certification requirements.

The accepting certification body and/or the transferring client shall contact the accreditation body, which accredits the issuing certification body where the issuing certification body.

- a. still needs to provide the requested information to the accepting certification body,
- b. suspends or withdraws the transferring client's certification without cause.



The accreditation body shall have a process for addressing the situation, including the suspension or withdrawal of the accreditation, where the issuing certification body does not cooperate with the accepting certification body or suspends or withdraws the transferring client's certification without cause.

Once the accepting CB has issued the certification, it shall inform the issuing CB.

## **Complaints**

A description of the complaints-handling process made publicly accessible.

Submission, investigation, and decision on complaints shall not result in discriminatory actions against the complainant.

Upon receipt of a complaint, ControlCase shall confirm whether the complaint relates to certification activities that it is responsible for and, if so, shall deal with it. If the complaint relates to a certified client, then an examination of the complaint shall consider the effectiveness of the certified management system.

Any complaint about a certified client shall also be referred by the ControlCase to the certified client in question at an appropriate time.

The ControlCase shall have a documented process to receive, evaluate and make decisions on complaints. This process shall be subject to requirements for confidentiality as it relates to the complainant and the subject of the complaint.

The complaints-handling process includes at least the following elements and methods:

- a. an outline of the process for receiving, validating, investigating the complaint, and deciding what actions to take in response to it.
- b. tracking and recording complaints, including actions undertaken in response to them.
- c. ensuring that any appropriate correction and corrective action are taken.
- d. ControlCase, receiving the complaint, shall be responsible for gathering and verifying all necessary information to validate the complaint.
- e. Whenever possible, ControlCase shall acknowledge receipt of the complaint and provide the complainant with progress reports and the outcome.
- f. The decision to be communicated to the complainant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the complaint.

ControlCase shall give the complainant formal notice of the end of the complaints handling process whenever possible.

ControlCase shall determine, together with the client and the complainant, whether and, if so, to what extent the subject of the complaint and its resolution shall be made public.



## Transfer Evaluation Process

### Step 1 – Customer Relation Personal shall:

- Obtain a filled Client Information Form.
- Obtain a copy of the client’s existing valid certificate.
- Obtain reason for seeking transfer and identification of any current engagement of the organization with regulatory bodies with respect to legal compliance relevant to the scope of certification.
- Obtain a copy of the previous assessment reports from the last audit cycle and closed non-conformities.
- Obtain necessary Management system documents.
- Any legal documentation reflecting a change in the entity name, address, ownership, etc.

### Step 2 – Transfer Review

- The transfer review shall be performed by the assessor assigned to the client.
- The assigned personnel shall be provided with the documents identified in step 1 above.
- The assigned personnel will review the above documents and any other available relevant documentation, such as audit notes, checklists, etc.
- The verification of the validity of the certification can be concluded from the following:
  - Verification of Valid Certificate of the Client
  - Last Audit Report issued by the Certification Body
  - Legal documentation Review
  - Formal communications (for closure of NCs) sent across by the certified organization to the certifying body.



- Outstanding nonconformities should be closed, if practical, with the issuing certification body, before transfer. Otherwise, they shall be evaluated for closing out by CCLLC during the transfer audit, and the transfer will be affected upon the successful closure.
- The assigned reviewer shall complete the Certificate Transfer Evaluation recommendation, compile supporting documents, and then forward them to CRO and QA Department Head for decision review.

### Step 3 – Decision Making Review

- The CRO and QA Department Head shall review the documents submitted by the assessor as a result of the transfer review process.
- If the transfer is approved, the certificate will be updated to show legal entity changes and reissued to the client.
  - The issue date and expiration date will not change.
- If the transfer is not approved, the client will be notified that a new assessment must be performed.

### Step 4 - Maintenance of client information

- Upon receipt of the complete package, Operations shall update the client information. Such update shall include as applicable:
  - Date for next activity
  - Certification date
  - Client Name

## Appeals, Complaints & Disputes

ControlCase would endeavour to provide efficient and satisfactory services as detailed in the Request Form. However, if it is felt that any decision or the conduct of ControlCase is unjust and prejudicial to any party, that party can appeal to ControlCase and seek redressal. These appeals are to be sent to ControlCase in writing.

Appeals, complaints, and disputes brought to the notice of ControlCase are promptly dealt with and remain confidential. Information about the client from sources other than the client is kept



confidential. This procedure applies to decisions pertaining to certification, including maintenance.

It is ensured that personnel is not employed to investigate any appeal, complaint, or dispute if they have been directly involved in the activities of the Organization or any other party involved in the appeal, complaint, or dispute in question within the certification cycle.

It is ensured that submission, investigation, and decision on appeals and complaints shall not result in discriminatory actions against the appellant/complainant.

When the Management Representative or the CRO cannot resolve appeals or complaints, the same shall be referred to the COO. Further, it shall be referred to the Committee for Safeguarding Impartiality.

A summary of appeals/complaints received and/or actions taken/completed is forwarded to the Management Representative for presentation in the Management Review meeting. As decided in the Management Review meeting, actions are implemented for further effectiveness.

#### **Appeals:**

“Appeal” means "any request for review that is conveyed in writing, against a decision made by ControlCase taking into consideration the explanation provided by the client." This may be during an audit at the client's premises or any work on ControlCase.

ControlCase has a documented process to receive, evaluate and make decisions on appeals.

A description of the appeals-handling process made publicly accessible on the ControlCase website.

ControlCase shall be responsible for all decisions at all levels of the appeals-handling process. ControlCase shall ensure that the persons engaged in the appeals-handling process differ from those who carried out the audits and made the certification decisions.

ControlCase shall ensure that Submission, investigation, and decision on appeals shall not result in discriminatory actions against the appellant.

The appeals-handling process shall include at least the following elements and methods:

- a. an outline of the process for receiving, validating, and investigating the appeal and deciding what actions are to be taken in response to it, taking into account the results of previous similar appeals.
- b. tracking and recording appeals, including actions undertaken to resolve them.
- c. ensuring that any appropriate correction and corrective action are taken.

ControlCase shall acknowledge receipt of the appeal and provide the appellant with progress reports and the outcome.



The decision to be communicated to the appellant shall be made by, or reviewed and approved by, individual(s) not previously involved in the subject of the appeal.

ControlCase shall give formal notice to the appellant of the end of the appeals-handling Process.

Appeals can be due to the following:

- Refusal of an audit by ControlCase
- Non-acceptance of the scope of certification
- Decisions made on misuse, suspension, withdrawal, cancellation, extending and reducing the certification.
- Failure to recommend certification by ControlCase.
- Notification by any third party/interested party against the grant of certification by ControlCase.

Any appeal from the client or interested parties seeking redressal when received is recorded and acknowledged by CRO. The appeal should contain all available documentary evidence. CRO will be responsible for gathering and verifying all necessary information related to the complaints. Any such appeals referred to management are examined in fairness and reviewed by CRO, and any other personnel as required, either separately or jointly. The appellant may be asked to withdraw the appeal if found not relevant. CRO shall initiate actions to resolve the appeals within a stipulated period of 3 months.

Resolution of the Appeal shall be handled in the following manner:

The team leader attempts to resolve the issue at the audit site. If the appeal is not resolved, CRO takes the matter up. If the CRO cannot resolve the appeal, the same shall be referred to the COO, with all information (including documentary evidence). The Committee for Safeguarding Impartiality takes up the matter if an appeal is not resolved.

CRO tracks and maintains a record of all appeals along with remedial actions about the certification system and keeps the appellant updated about the progress and outcome.

CRO identifies problems requiring any actions to prevent the above recurrence for corrective action (and preventive action if needed) commensurate with the nature and risk involved. These include measures such as:

- Restoring conformity to the certification system process.
- Assessing the effectiveness of remedial/corrective actions taken.

A formal notice of the conclusion of the appeal handling process shall be provided to the appellant.



## Complaints:

Normally complaints (dissatisfaction expressed by a person or the Organization) are made to ControlCase. Any complaint received by ControlCase, whether it pertains to ControlCase functions or the client, would be treated in all seriousness and investigated. CRO records these complaints, and the complainant would be informed of the receipt and advised on the investigation required within a reasonable 1 month. CRO initiates actions for resolving & restoring conformity to the Management System and for closing the complaint within three months from the date of receipt unless delayed for a specific reason. The results and actions taken/completed are informed according to the concerned parties. CRO will be responsible for gathering and verifying all necessary information related to the complaints.

For complaints received against clients, CRO may decide to:

- Advice visiting/audit may be planned for ascertaining the actions taken and ensuring the effectiveness of the certified management system.

Any such complaints referred to management are examined in fairness and reviewed by CRO and any other personnel as required, either separately or jointly. The complainant may be asked to withdraw the complaint if found not relevant. A complaint is to be dealt with within three months after the date it has been received.

Resolution of the Complaint shall be handled in the following manner:

- The team leader attempts to resolve the issue at the audit site. If the appeal is not resolved, the matter is taken up by CRO, who analyses and initiates corrective action / preventive action. If the CRO cannot resolve the Complaint, the same shall be referred to the COO with all information (including documentary evidence). If an appeal is not resolved, the matter is taken up by Committee for Safeguarding Impartiality.

CRO tracks and maintains a record of all complaints along with remedial actions about the certification system and keeps the complainant updated about the progress and outcome.

CRO identifies problems requiring any actions to prevent the above recurrence for corrective action (and preventive action if needed) commensurate with the nature and risk involved. These include measures such as:

- notification to appropriate authorities as required by regulation.
- restoring conformity to the certification system process
- preventing recurrence.



- evaluating and mitigating any adverse incidents (including hazards, safety, and security) and their associated risks and impacts
- ensuring satisfactory interaction with other components of the Management System
- assessing the effectiveness of remedial/corrective actions taken

In case of complaints relevant to the public interest, the client and the complainant shall be consulted. Information about the complaint and its resolution will be available for public viewing if necessary.

A formal notice of the conclusion of the complaints handling process shall be provided to the complainant.

#### **Disputes:**

Disputes here convey disagreement and apply to certification process decisions made during the audit, including document adequacy.

The team leader is authorized to resolve the dispute and conclude the audit effectively.

The dispute, if not resolved adequately by the team leader, can be brought to the notice of the CRO as an appeal. The CRO shall decide the matter through the appeal handling process (as described in earlier sections)

Resolution of the Complaint shall be handled in the following manner:

- The team leader attempts to resolve the issue at the audit site. If the dispute is not resolved, the matter is taken up by CRO, who analyses and initiates corrective action / preventive action. If the CRO cannot resolve the dispute, the same shall be referred to the COO with all information (including documentary evidence). If the dispute is not resolved, the matter is taken up by Committee for Safeguarding Impartiality.

#### **Addressing All Appeals, Complaints, and Disputes at the Risk Management Level:**

The Risk Management Committee meetings have convened.

If any, a summary of appeals, complaints, and disputes is reviewed, as part of the routine agenda, in all RM meetings for adequacy of actions taken and for any suggested improvements.

This aspect will be reviewed during the resolution of any appeals, complaints, and disputes if a decision is made to refer, especially to RM. If required, a special session is convened.





At least two members of the RM (Appeals committee), two members from CCLLC, and a client representative, if any, will have to be present when the appeal, complaint, or dispute is taken up, and none of them would have any interest in the party making the appeal, complaint or dispute. Suppose an appellant submits to ControlCase motivated objections in writing against a particular member during the appeal. In that case, this member shall withdraw in favour of a substitute if the objections are judged to be well founded.

The decision of the RM committee shall be final and binding on both parties. The same shall be communicated to the concerned parties, and the decision implemented.

## Disclaimer

While this document is intended to guide prospective/existing clients of ControlCase and every effort is made to keep its content accurate and up to date, it should not be construed as comprehensive or conclusive in its contents and applicability. Assessment audit / Certification / Surveillance being activities that always call for auditor's judgment based upon the facts and circumstances of each case/situation, this document cannot be construed to be binding ControlCase in the scope, interpretation, and applicability of its certification activities.