



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		
2	3/15/2019	1.1	Update Draft	Mark Smith		
3	3/20/2019	1.2	Review	Mark Smith	Satya Rane 3/22/2019	Norm Laudermilch 3/22/2019
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



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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 is applicable to ControlCase channel 1 service groups and all support staff.

Channel 1 Services groups for ISO certification are CC Assessments LLC for 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/PMS/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/PMS/BCMS, in accordance with the provisions of ISO/IEC 17021-1:2015 and other relevant documents.
- b. Surveillance and recertification audits of a client organization's ISMS/PMS/BCMS in accordance with ISO/IEC 17021-1:2015 on a periodic basis for continuing conformity with relevant requirements and for verifying and recording that a client organization takes



corrective action on a timely basis to correct all nonconformities.

ControlCase is providing certification services to organizations established as legal entities in multiple countries. It is expected that the organizations applying for certification would be registered entities as per applicable laws within their country.

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

Organizations interested to obtain 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 specific 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 3 months. This is necessary to assess the ability of the organization to carry out the process as per the documented management system.
- Carried out minimum one management review for the documented management system prepared as per relevant management system.

During 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 necessary documents. ControlCase reserves the right to seek information on the concerned personnel before deciding to accept the application for further processing.

The information gathered from the application is used for the preparation of on-site assessment, 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, 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. Adverse decision of ControlCase would be communicated with reasons for rejecting the application.

Submission of Proposal & Certification Agreement

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



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

Further processing of application shall be taken up on receipt of acceptance of the proposal and confirmation that the “Certification agreement” is acceptable. Upon acceptance of ControlCase proposal the applicant organization needs to submit the “Certification Agreement” duly signed.

Upon receipt of ‘Certification Agreement’, ControlCase will provide portal access to the applicant organization. Necessary information like username 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 successful completion of the certification activities, clients shall be provided with a Certification of Registration. This document shall provide unambiguous information related to the organization being certified, including the scope of the certification being granted, the audit criteria (Standard or other normative document) and the validity period of the certification (see Certificate Production Process).

The ControlCase shall provide to each of its client organizations whose ISMS/PMS/BCMS is certified, certification documents such as a letter or a certificate signed by an officer who has been 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/PMS/BCMS standard ISO/IEC 27001, 27702, and/or 22301 to which the ISMS/PMS/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 organization based on relevant management system standard (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 other means and a suitable time frame shall be given for implementing the modified criteria. Any transition policy announced by the accreditation body would be adopted by the ControlCase and communicated to the certification clients. The client shall communicate their objection, if any, acceptance in writing by registered mail / email other means within 30 days of the receipt of the amended criteria. If the communication is not received within 30 days, it will be presumed that the client is not willing to adopt the changed criteria.

The implementation of 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.

If a client is not willing to adopt the changed criteria, it can opt out of the certification and the certificate is withdrawn with effect from the date of the implementation of revised criteria.

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 that make the certification or recertification decisions are different from those who carried out the audits.

ControlCase shall confirm, prior to 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/PMS/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 that represent
- 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 nonconformities.

The criteria against which the ISMS/PMS/BCMS of a client are audited shall be those outlined in the ISMS/PMS/BCMS standard explanation is required as to the application of these documents to a specific certification program, then such an explanation shall be given by a relevant and impartial committee or persons 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 certification of ISMS/PMS/BCMS s and the procedures for auditing and certifying the client organization's ISMS/PMS/BCMS .

Team Leader submits report along with the supporting auditor notes, necessary documents to QA for quality assurance review. Once QA has approved release of report it is sent to the release team.

The release team reviews report for accuracy, grammar, spelling and compliance with ControlCase standards and policy. If compliant the certificate is created, and the report and certificate are released to the client. If non-conformity is found the report and associated information is sent back to QA team. The QA team coordinates remediation with team leader and resubmits to release team. QA maintains a record of all non-conformity issues.

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

Certificate of Registration



The certificate shall include the ControlCase logo, Accreditation body logo (if Applicable) the name of the client, address of the premises of the organization, certificate number, the scope of certification, Approval date of the certification, 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 certificate lapses for a time provided that:

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

Granting of Certification

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

The applicant meets the criteria of certification and all non-conformities found against the criteria of certification during assessment have been closed 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 implementation of certification system as per the criteria of ControlCase.

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

The Initial certification shall be for a period of 1 to 3 years depending on applicable regulation or standard.

In the event of any adverse issue arising 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 of certification / permission to continue the



certification based on facts and the results of such presentation by Chief Risk Officer (CRO) and the QA Department Head.

Maintaining Certification

ControlCase shall maintain certification based on 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 monitor 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 criteria of certification and all nonconformities found against the criteria of certification during surveillance assessment have been closed to the satisfaction of ControlCase as per laid down 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 customers of the organization are satisfied by the product or services of the client.

In the event of any adverse issue arising 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 in respect of maintenance of the certification of approval on the basis facts and the results of such presentation by Head-ISO Group.

ControlCase team manager is responsible for ensuring that audits are completed within the designated time windows and escalate to ISO Partner and COO if a customer's certification will expire. Additionally, any other factor that affect the customer certification will be reported to ISO partner and COO.



A monthly review of customer audit and certification status is conducted by team manager.

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 in case of suspension the client refrains from further promotion of its certification. ControlCase shall make the suspended status of the certification 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 Certificate and ensuring 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 for 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 with the agreed standard consistently
- The Organization fails to comply with the financial requirements of the agreement of certification
- The Organization undertakes actions which bring ControlCase into disrepute
- Any wilful mis-declaration in the application form
- Willful non-compliance to the terms and conditions specified in agreement
- Excessive and or serious complaints against 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 specify the citing intention to suspend the certificate and ask for remedial measures within a period of 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 suspension of the certificate of registration on the basis facts and the results of such presentation by CRO and QA Department Head.

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

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

If delay is persisting, in taking corrective actions even after persuasion, CRO decides for recall of certificates and logo as applicable in the case of withdrawal.

On fulfillment of indicated conditions within the stipulated time, ControlCase may remove the suspension and notify the Organization accordingly. 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 suspension period may be granted under situations wherein the client or ControlCase has sufficient reasons to justify the suspension period. Under no situations will the extension of suspension period exceed by 3 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 “Condition for Suspension of Certification” para above exist, and 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.
- In such cases, a formal communication will be made to the Organization and/or regulation/standard governing body in which ControlCase specify the citing intention to withdraw the certification and ask for respond within a period of 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 withdrawn of the certificate of registration on the basis 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 ControlCase website.
- An Organization may dispute or appeal or complain against the decision of ControlCase which will be dealt with as specified in procedure
- Once the Certificate of registration is withdrawn and if the Organization wishes to get the certification redone, ControlCase would carry out a complete 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 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 amendment made in the “List Of certified Companies” published by ControlCase on website as decided by CRO
- If an Organization makes a false claim as to certification by ControlCase, appropriate action is taken against such Organization which may include corrective action, publication of 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 cancelled in the following cases at the request of the Client.

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 ControlCase website.

Once the Certificate of Registration is cancelled and if the Organization wishes to get the certification redone, ControlCase would carry out a complete 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 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 amendment made in the “List of certified Companies” published by ControlCase on 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, (hereinafter referred to as the “issuing certification body”), by another accredited certification body, (hereinafter referred to as the “accepting certification body”) for the purpose of issuing its own certification. Multiple certification (concurrent certification by more than one certification body) does not fall under the definition above and is not encouraged by IAF.

Only certification which is covered by an accreditation of an IAF or Regional MLA signatory at level 3 and where applicable level 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. Certification which is known to be suspended shall not be accepted for transfer.

In cases where certification has been granted by a certification body which has ceased trading or whose accreditation has expired, been suspended or withdrawn, the transfer shall be completed within 6 months or on expiration of the certification whichever is sooner. In such cases, the accepting certification body shall inform the accreditation body, under whose accreditation it intends to issue the certification, prior to the transfer.

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

The accepting certification body shall carry out a review of the certification of the transferring client. This review shall be conducted by means of a documentation review and where identified as needed by this review, for example there are outstanding major nonconformities, 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 pre-transfer review. The review may be conducted by one or more persons. The individual or group conducting the pre-transfer visit shall have the same competence that is 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. that the site or sites wishing to transfer certification hold a valid accredited certification.
- e. the initial certification or 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. If these audit reports are not made available or if the surveillance audit or recertification audit has not been completed as required by the issuing certification body's audit program, then the organisation shall be treated as a new client.
- f. complaints received and action taken.
- g. 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.
- h. any current engagement by the transferring client with regulatory bodies relevant to the scope of the certification in respect of legal compliance.

In accordance with 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 outstanding minor nonconformities.

Where the pre-transfer review (document review and/or pre-transfer visit) identifies issues that prevent the completion of 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 shall be documented by the accepting certification body and the records maintained.

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

If no problems are identified by the pre-transfer review, the certification cycle shall be based on the previous certification cycle and 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 with the indication that the organization was



certified by a different certification body before a certain 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 take the decision on certification before any surveillance or recertification audits are initiated.

The cooperation between the issuing and accepting certification bodies is essential for the effective process for transfer and the integrity of certification. When requested, the issuing certification body shall provide to the accepting certification body 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 that the issuing certification body provides the information sought by the accepting certification body. 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 requirements of certification.

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. has not provided 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 any 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 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 to 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 for deciding what actions are to be taken 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 shall 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.

Whenever possible, ControlCase shall give formal notice of the end of the complaints handling process to the complainant.

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 complete filled Client Information Form.
- Obtain a copy of the client's existing valid certificate.



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

Step 2 – Transfer Review

- The transfer review shall be performed by assessor assigned to 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:
 - Verification of Valid Certificate of the Client
 - Last Audit Report issued by the Certification Body
 - Legal documentation Review
 - Formal communications (for closure of NC's) 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 upon the successful closure of the same the transfer will be affected.



- The assigned reviewer shall complete the Certificate Transfer Evaluation recommendation, compiling supporting documents and then forward 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 transfer review process.
- If 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 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

It would be the endeavor of ControlCase to provide efficient and satisfactory services as detailed in the Request Form. However, in case 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 is applicable to decisions pertaining to certification including maintenance.



It is ensured that personnel are not employed to investigate any appeal, complaint or dispute if they have been directly involved in the activities towards 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 any discriminatory actions against the appellant / complainant.

In situations where appeals or complaints cannot be resolved by Management Representative or the CRO, the same shall be referred to COO further it shall be referred to 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. Actions as decided in the Management Review meeting 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 either during audit at the client's premises or any work pertaining to ControlCase.

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

A description of the appeals-handling process made publicly accessible in ControlCase web site.

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 are different 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 any 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 for 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 shall 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:

- Refusal of an audit by ControlCase
- Non-acceptance of 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 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. Actions shall be initiated by CRO for resolving the appeals within a stipulated period of 3 months.

Resolution of Appeal shall be handled in the following manner:

An attempt is made by the team leader to resolve the issue at the audit site. If the appeal is not resolved, the matter is taken up to CRO. In case the CRO is unable to resolve the appeal, the same shall be referred, with all information (including documentary evidence) to the COO. If appeal is not resolved, then the matter is taken up to Committee for Safeguarding Impartiality.

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

CRO identifies problems requiring any actions to prevent recurrence of the above for corrective action (and preventive action if required) 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 conclusion of the appeal handling process shall be provided to the appellant.

Complaints:

Normally complaints (dissatisfaction expressed by a person or by 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. These complaints are recorded by CRO and the complainant would be informed of the receipt of complaint and advised on the investigation required within a reasonable time of 1 month. Actions are initiated by CRO for resolving & restoring conformity to Management System and for closing the complaint within three months from the date of receipt of complaint unless delayed for a specific reason. The results and actions taken/completed are informed accordingly 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:

- Advise to visit / audit may be planned for ascertaining the actions taken and ensuring 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 after the date on which it has been received, is to be dealt with, within three months.

Resolution of Complaint shall be handled in the following manner:

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



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

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

- notification to appropriate authorities as required by regulation
- restoring conformity to 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 public interest, the client and the complainant shall be consulted and if felt necessary information about the complaint and its resolution will be made available for public viewing.

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

Disputes:

Disputes here convey disagreement and are applicable to certification process decisions made during 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 CRO as an appeal. The CRO shall resolve the matter through the appeal handling process (as described in earlier sections)

Resolution of Complaint shall be handled in the following manner:

- An attempt is made by the team leader to resolve the issue at the audit site. If the dispute is not resolved, the matter is taken up to CRO, who analyses and initiates correction, corrective action / preventive action. In case the CRO is unable to



resolve the dispute, the same shall be referred, with all information (including documentary evidence) to the COO. If dispute is not resolved, then the matter is taken up to Committee for Safeguarding Impartiality

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

The Risk Management Committee meetings are convened.

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

During resolution of any appeals, complaints and disputes if a decision is made to refer specially to RM, this aspect will be specifically reviewed. If required a special session is convened.

At least two members of the RM (Appeals committee), two members from CCLLC and 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. In case an appellant submits to ControlCase motivated objections in writing against a certain member, this member during the duration of appeal, shall withdraw in favor 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 decision implemented.

Disclaimer

While this document is intended to provide guidance to prospective / existing clients of ControlCase and every effort is made to keep its content accurate and up to date, it should not be construed to be 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 / situations, this document cannot be construed to be binding ControlCase in the scope, interpretation and applicability of its certification activities.