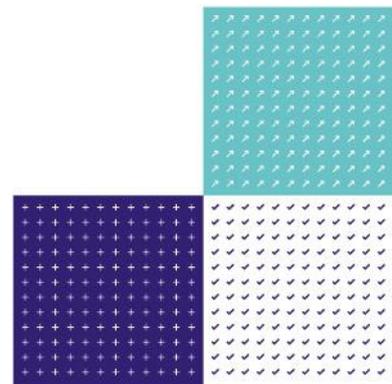


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Accredited Certification of Competence Management Systems (CMS)



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1. Introduction

- 1.1 This document describes the UKAS policy for an organisation's competence management system (CMS) in the absence of an ISO/EN/BS CMS standard* and the necessary certification body approach to the audit of that CMS for it to be acceptable for accreditation under ISO/IEC 17021-1.

*Should an ISO/EN/BS standard for CMS be produced then this TPS will be reviewed accordingly.

- 1.2 The content is equally applicable to scheme owners who are not the certification body but intend to establish a competence management system for a specific sector of industry to implement and seek accredited certification recognition.

2. Definitions and Concepts

2.1 Competence

The ability to apply knowledge and skills to achieve intended results.

2.2 Management System (MS)

A set of interrelated or interacting elements of an *organisation* to establish *policies* and *objectives* and *processes* to achieve those objectives (ISO 9000:2015).

- A MS comprises activities by which the organisation identifies its objectives and determines the processes and resources required to achieve desired results consistent with the policy.
- The MS manages the interacting processes and resources required to provide value and realise results for relevant interested parties.
- The MS enables top management to optimise the use of resources considering the long and short-term consequences of their decision.
- A MS provides the means to identify actions to address intended and unintended consequences in providing products and services.

2.3 Competence management system, scheme, and criteria

A competence management **system** consists of the policies, objectives and especially the processes within an organisation to demonstrate it employs and deploys competent persons that have demonstrated they meet the specified competence requirements for the tasks required, consistent with the requirements of a scheme, and objective evidence is available to demonstrate this and on-going performance is monitored.

A competence management **scheme** specifies the requirements for competence management and the applicable competences that must be demonstrated by individuals undertaking the specified tasks. The competence requirements may be defined by the scheme owner (regulatory body, certification body (CB), or other group responsible) based on a detailed job task analysis, OR may be generic criteria, e.g. legislation, which the employer may be required to include within their own job task analysis as part of the process for designing the CMS (see phase 1 below).

Competence **criteria** may be defined in British or International Standards, or in a regulatory framework document, or may be established by a certification body/scheme owner and when incorporated into a competence management system, this enables an organisation to

demonstrate it has a system in place to consistently manage the competences of individuals to carry out defined tasks.

A competence management system is more than an in-house examination/test; it is a system that is specifically aligned to the specification and collation of evidence based performance results carried out and monitored in the work place, along with ongoing monitoring of performance of individuals meeting the specified competence requirements for the tasks they undertake within the specified criteria.

- 2.4 Certification of a management system provides independent demonstration that the management system of the organisation:
- a) conforms to specified requirements; (the scheme);
 - b) is capable of consistently achieving its stated policy and objectives;
 - c) is effectively implemented.
- 2.5 Certification of a competence management system thereby provides value to the organisation, its customers and interested parties that the organisation can demonstrate competent personnel are employed and deployed to undertake the specified tasks.

3. CMS Schemes and CMS Scheme Owners

- 3.1 Every conformity assessment scheme shall have a scheme owner. A scheme owner can be the certification body (CB) itself, a governmental authority or some other third party. In the absence of an identifiable third-party scheme owner, any CB wishing to provide conformity assessment (e.g. certification) for a scheme must take on the responsibility for the scheme ownership.
- 3.2 National/International standards bodies may produce standards that define competence, but they are not seen as a scheme owner as generally the existence of a competence standard does not itself address all the requirements expected of a scheme. The national/international standards or industry specific regulations will normally be the basis for the design of a CMS, as the intended output is the organisation demonstrating they employ and deploy persons with the necessary competence for the tasks they undertake.
- 3.3 UKAS accredits CBs to deliver specific schemes. A CB wishing to offer certification for a scheme not owned by them must satisfy themselves on the criteria, completeness and integrity of the scheme before application for accreditation. The scheme will be reviewed by UKAS as part of the accreditation assessment together with the assessment of the capability of the CB to deliver a robust and effective audit as per ISO/IEC 17021-1, and thus providing confidence to a scheme owner that the CB has demonstrated its ability to audit and certify organisations as meeting the requirements of the (CMS) scheme.

4. Structure of the Competence Management System (CMS)

- 4.1 In the absence of an ISO/EN/BS CMS standard UKAS will expect that the 15 recognised principles (see below) be addressed in any CMS. These principles are well documented and have been acknowledged by bodies such as UK HSE for managing safety related competences and are considered essential by UKAS as equally applicable to any CMS seeking to demonstrate achievement of the desired objectives. This is consistent with a Plan Do Check Act (PDCA) cycle.
- 4.2 Any CMS is therefore required to address these principles, noting that the existence of a national/international standard, regulatory requirements or the specific criteria of a scheme owner for competence will input into certain principles to some degree.
- 4.3 The analysis of activities (job task analysis) and determination/specification of competence and the criteria required to meet the competences (principles 1 to 4) may be prescribed in full by, for example, a regulatory body or other agency, and subsequently incorporated in the requirements of the CMS. Alternatively, the scheme may only specify the generic competences thus requiring an employer organisation to undertake/complete the detailed job analysis and specify the detailed competences (and evidence that confirms competences have been satisfactorily demonstrated) as applicable to the relevant tasks within their organisation and required by the scheme.
- **PHASE ONE: Establish requirements for the CMS**
Principle1: Identify activities and assess risks
Principle2: Select standards
 - **PHASE TWO: Design the CMS**
Principle3: Develop procedures and methods
Principle4: Decide how to meet the standards
Principle5: Establish requirements for training, development and assessment
Principle6: Maintain managers' competences
 - **PHASE THREE: Implement the CMS**
Principle7: Select and recruit staff
Principle8: Train, develop and assess employees
Principle9: Control activities undertaken
 - **PHASE FOUR: Maintain and develop competence**
Principle10: Monitor and reassess staff performance
Principle11: Update the competence of individuals
Principle12: Manage sub-standard performance
Principle13: Keep records.
 - **PHASE FIVE: Verify, audit and review the CMS**
Principle14: Verify and audit the CMS
Principle15: Review and Feedback Text
- 4.4 The employer organisation must therefore be competent to analyse the work and determine the competences needed to undertake the work (if not defined in the scheme), determine the requirements for demonstration of competence and the type of evidence to support this, in addition, to specify the competence and the process for evaluating/monitoring personnel and the detailed records of the evaluation. *A tick in a box is not a record of competence in its own right; it is the evidence seen/witnessed of what was demonstrated which is the specific evidence to be recorded and what is required to support the tick in the box.*

- 4.5 The competence of personnel and the process for confirming all stages have been completed and making the final decision on competence and the method for confirming this must be defined in the CMS of the organisation.

5. CMS Scheme Development

- 5.1 The certification body shall identify the top management (board, group of persons, or person) having overall authority and responsibility for each of the following:

- development of management system certification services and schemes (*ISO/IEC 17021-1 clause 6.1.3 e*)

- 5.2 A certification body (or the scheme owner) is expected to develop the requirements of a competence management scheme, specifying the competence criteria and requirements for the CMS based on the 15 principles. This will ensure the CMS developed/implemented by an employer is sufficiently detailed to ensure the employer is able to confirm and demonstrate competent people are employed meeting the specified competence criteria requirements. A scheme owner may complete the design of the scheme, (competence requirements) but the organisation will develop the methodology within their own organisation consistent with the 15 principles, demonstrate implementation, and confirm competent personnel are employed for the specified tasks.

- 5.3 In addition, since this is a management system the scheme should also take cognisance of the ISO Annex SL High Level Structure (HLS). Where a scheme owner has not developed all the requirements; then it is incumbent on the CB to do so. Equally when an external scheme owner has developed all the requirements, the CB has a responsibility to satisfy itself that the scheme is “fit for purpose” including any subsequent changes.

- 5.4 The ISO HLS for management systems standards requires an organisation to establish a management system consistent with the organisation and business objectives and have the appropriate direction and support (leadership) and commitment from and by top management, adequately resourced and defined within the roles and responsibilities and documented arrangements to ensure capability to achieve the desired outcomes. The management system should be subject to risk based considerations which could affect the ability of the organisation to achieve the desired outcomes, as well as a process for monitoring of performance of the system and its outcomes (i.e. for CMS *competent persons to undertake the tasks to which the competences refer, and the identification and implementation of improvements that may be required*).

- 5.5 The competence management system and scheme requirements collectively should contain requirements consistent with the ISO high level structure for management systems.

Note: a number of the 15 principles align with the ISO Annex SLHLS requirements.

- 5.6 Certification of a CMS is NOT certification of persons by the CB. The CMS when certified under management system certification must confirm the organisation (the employer) has developed the system in line with the business objectives, management commitment and leadership etc. and has developed/implemented robust and effective arrangements for assessing/confirming competence, internal “certification”, monitoring of performance and correct deployment of competent staff for the tasks required, i.e. the totality of managing competence of individuals for stated tasks, as required by the scheme.

6. The Certification Body CMS Audit Process

6.1 ISO/IEC 17021-1 requires a CB to determine the technical areas appropriate to the management systems certification in order for the CB to determine competence for auditors, decision makers etc. Whilst in most cases for a CMS the technical area will align directly to the specific technical elements of the scheme, some schemes may have categories and/or levels of competence and this may influence the technical area classifications

6.2 The CB's initial audit of an applicant organisation's CMS aligning with ISO/IEC 17021-1 shall consist of two stages.

6.3 Stage 1 (readiness and suitability)

- A CB must fully understand the organisation, the scope of activity, and the geographical limitations etc. in which it deploys competent personnel for the tasks covered by the CMS.
- A CB must understand the organisation's documented system and how the clients documented system uniquely addresses the 15 principles and confirm that it has been implemented accordingly to align with the scheme requirements.
- Since a competence management system is focused at evidence of performance to confirm competence, the employer organisation is required to describe the process for evaluating/demonstrating competence, the type of evidence to be collected during routine work operations, and/or other arrangements which should then be assessed technically by the CB and confirmed as **suitable** to meet the competence criteria specified in the scheme. This is a fundamental evaluation of the detail design of the employer organisation's own CMS consistent with the scheme competence requirements and is necessary at stage 1 in order to proceed and also to effectively plan the stage 2 audit.
- A CB must confirm the CMS captures all individuals no matter what stage they are at in achieving full competence status.
- A CB must confirm the employer organisations own risk assessment is in place and effective.

6.4 Stage 2

The stage 2 audit shall focus on confirming the entire CMS is being implemented and is effective to deliver and confirm the organisations ability to consistently ensure competent personnel are deployed accordingly. The stage 2 audit is therefore not just a check that records exist for individuals, but to confirm the processes in place to achieve the desired output are operating and demonstrate how competence has been confirmed consistent with a documented system (and the scheme requirements).

7. Use of IAF MD documents

- 7.1 IAF Mandatory Documents (MD) relevant to management systems audits must be carefully considered if they are to be implemented for CMS audits.
- 7.2 IAF MD 5 (Determination of Audit Time of Quality, Environmental and Occupational Health & Safety Management Systems) is stated as applicable for QMS, EMS and OH&SMS audits only however the underlying principles in MD 5 are applicable “to determine appropriate audit time of management systems, taking into account the specifics of the client to be audited”. The CB is required to consider the audit requirements and determine the time needed to undertake an effective audit. This will be influenced by how the organisation is structured, the locations of competent personnel and how the scheme is implemented across the entire organisation.
- 7.3 Auditing the CMS for effectiveness and the correct output involves significantly more time for the design evaluation, interviews of key personnel to confirm their technical competence and the technical adequacy of the arrangements in place, the consistency of understanding and application of requirements, especially for larger organisations with greater numbers of personnel undertaking monitoring of performance/confirmation of demonstration of competence. This will require the end to end process to be audited from initial recruitment, evaluation, training, assessment of competence/monitoring, deployment of competent personnel, management of poor performance (unacceptable work), management of records and confirmation of the system (see the fifteen principles of a CMS), and depending on the organisation, some or all of these activities may be across a number of sites and involving several individuals undertaking similar roles within the CMS.
- 7.4 When determining the total man-days, care must be exercised to ensure an effective audit; increasing the number on the team to meet the total man-days may not achieve the desired outcome, or a rigorous and effective audit. Consequently, a stage 2 audit and subsequent surveillance audits may need to be split into more than one visit even at the same location.
- 7.5 Multi sites
- IAF MD 1 (IAF Mandatory Document for the Audit and Certification of a Management System Operated by a Multi-Site Organization) can only be applied IF the organisation satisfies the criteria in MD 1 AND has sites employing personnel undertaking work which requires identical competences. The CB must be able to show they have detailed knowledge of the employer organisation and where the key controls/activities take place across the company, the generation and location of records which confirm competence, the management of personnel involved in delivery of the CMS etc and they have confirmed all the controls are effective across the organisation before certification is granted. The sample size must be justified based on the considerations for each organisation and their structure and could in all likelihood be greater than the square root factor in MD 1.
- 7.6 Combined/Integrated audits
- If a CB undertakes a combined audit along with other management system audits, or an integrated audit of an organisation’s business management system to include CMS, the audit plan must clearly detail the arrangements for assessing the design of the CMS, and the delivery in total with sufficient time allowed for each specific topic as related to the CMS. The audit plan must demonstrate/confirm the complete audit of the employer organisations arrangements, which themselves collectively cater for the 15 principles of a CMS.

8. UKAS Assessment of the Certification Body's Audit/Certification Process

- 8.1 UKAS will focus on the following elements that must be considered and demonstrated (*not exhaustive*):-
- Application - information requirements appropriate for CMS.
 - Factors for determining audit time and final figure justification.
 - Determination of CMS audit programme (3-year cycle). Minimum coverage each visit, CMS processes - which can be sampled v. those which must be audited every visit in order to give the necessary confidence that the CMS delivers competent personnel according to scheme requirements.
 - Amendment to audit programme and subsequent audit plans based on findings from current visit. For a CMS the 3-year audit programme may/will need to be developed for each individual client. *Since organisations will have their own unique arrangements for addressing the 15 principles many of which will be embedded in fewer processes. Complexity of an organisation will be a key input to the audit programme.*
 - Audit plan which is a reflection of key processes in the CMS (i.e. addressing the 15 principles reflecting the clients' organisation/ processes for achieving them etc)? – *e.g. Plans will be unique to each organisation depending on size complexity of the organisation (several sites) and scope of the CMS and numbers of personnel and range of competences defined.*
 - Content of report - what details must report include as per ISO/IEC 17021-1 to ensure scope coverage reporting is adequate and enables an informed certification decision - *e.g. the details and results of sampling/interviews of management, supervisors, trainers/mentors and operators to confirm the links between the processes, information accuracy, implementation of the processes etc, the details of conformity and non- conformity, and the judgements/conclusions of the auditor(s). Also reports should reflect the coverage as proposed in the audit plan demonstrating the process audit approach and concluding on the effectiveness of the arrangements in place.*
 - Auditors to report on judgement of effectiveness etc. – *e.g. confirmation that the CMS does result in competent personnel deployed for the tasks. Evidence to support how it was established that this is in fact the case.*
- 8.2 The CB will be expected to show how it 'validated' its audit process to confirm that its audits are effective - (e.g. trial run, non-accredited audit/certification) - *How the CB has confirmed its audits are effective, e.g. detailed planning, correct rigour, enough time allocation, etc.*
- 8.3 For new schemes it is very unlikely there will be many audit files (if any) - possibly non-accredited certification records if trial runs used. The focus of the head office will therefore be on the design process and requirements as outlined above. If client records are available, they should demonstrate the above.