

Kantara Certification Body: KCB-01-0010  
 Policy & Practices Handbook

**Version** **0.08.01**

**Draft Date** 2022-02-07

**Effective Date** tbd

**Status** KCB Policy

**Approval Authority** KCMC

**Approval** tbd

**Editor** Kantara Initiative Inc. KCB Project editing team

**Contributors** KCMC Members, voting and non-voting, current as of the date of publication.

**Abstract**

This document describes the Kantara Certification Body’s (KCB) Policy for its own operations and for its provision of certification services against the certification schemes recognized under this policy. It defines the obligations upon the Kantara Certification Management Committee (KCMC) and other related parties which are bound to this policy, either in part or whole.

This document also describes the practices which are employed to ensure conformance with the policy directives.

**Reference Standard**

The whole document adopts the structure of ISO 17065 ([IS17065] – see ‘References’) and is the primary reference document for the KCB’s Accreditation under that international standard.

IS17065: §1

**Notice**

This document has been prepared by Kantara Initiative’s Kantara Certification Management Committee. Permission is hereby granted to use the document solely for the purpose of participating in a manner consistent with the policy and practices of the KCB and of any applicable policy and practices as relate to a certification service recognized by this document. No rights are granted to prepare derivative works of this document. Entities seeking permission to reproduce portions of this document for other uses must contact Kantara Initiative to determine whether an appropriate license for such use is available.

Implementation or use of certain elements of this Handbook may require licenses under third party intellectual property rights (e.g. ISO, ANSI, …), including without limitation, patent rights. The Participants of and any other contributors to the Specification are not and shall not be held responsible in any manner for identifying or failing to identify any or all such third party intellectual property rights. This Handbook is provided "AS IS," and no Member or Participant in Kantara Initiative makes any warranty of any kind, expressed or implied, including any implied warranties of merchantability, non-infringement of third party intellectual property rights, and fitness for a particular purpose. Implementers of this Handbook are advised to review Kantara Initiative’s website (http://www.kantarainitiative.org/) for information concerning any Necessary Claims Disclosure Notices that have been received by the Kantara Initiative Board of Directors.

**IPR**: [Option Patent & Copyright: Reciprocal Royalty Free with Opt-Out to Reasonable And Non Discriminatory terms (RAND)](https://kantarainitiative.org/confluence/x/DYBQAQ) | Copyright © 2022

**CONTENTS**

[1 INTRODUCTION 10](#_Toc50744302)

[1.1 Scope 10](#_Toc50744303)

[1.2 Authority 10](#_Toc50744304)

[1.3 Interested Parties 10](#_Toc50744305)

[1.4 Key words 10](#_Toc50744306)

[1.5 Effectiveness 11](#_Toc50744307)

[1.6 Review and Approval 11](#_Toc50744308)

[1.7 Changes in this revision 12](#_Toc50744309)

[1.8 Document structure 12](#_Toc50744310)

[2 REFERENCES 13](#_Toc50744311)

[3 TERMINOLOGY 14](#_Toc50744312)

[3.1 Kantara-wide terms 14](#_Toc50744313)

[3.2 Terms defined for this document 14](#_Toc50744314)

[3.2.1 iaw 14](#_Toc50744315)

[3.2.2 Recognized Certification Scheme 14](#_Toc50744316)

[3.3 Implicit usage 14](#_Toc50744317)

[3.3.1 ‘The KCB’ 14](#_Toc50744318)

[3.3.2 ‘The KCMC’ 14](#_Toc50744319)

[4 GENERAL 15](#_Toc50744320)

[4.1 Legal and contractual matters 15](#_Toc50744321)

[4.1.1 Legal responsibility 15](#_Toc50744322)

[4.1.2 Certification agreement 15](#_Toc50744323)

[4.1.3 Use of license, certificates and marks of conformity 17](#_Toc50744324)

[4.2 Management of impartiality 17](#_Toc50744325)

[4.2.1 [KCB] Impartiality 17](#_Toc50744326)

[4.2.2 [KCB] Risks to impartiality 17](#_Toc50744327)

[4.2.3 [KCB] Review of risks to impartiality 17](#_Toc50744328)

[4.2.4 [KCB] Mitigating risks to impartiality 18](#_Toc50744329)

[4.2.5 [KCB] Committment to impartiality 18](#_Toc50744330)

[4.2.6 [KCB] Prohibited services 18](#_Toc50744331)

[4.2.7 [KCB] Preservation of impartiality 18](#_Toc50744332)

[4.2.8 [KCB] Segregation of responsibilities 19](#_Toc50744333)

[4.2.9 [KCB] Non-affiliation of services 19](#_Toc50744334)

[4.2.10 [KCB] Prohibited services 19](#_Toc50744335)

[4.2.11 [KCB] Review of impartiality risks 19](#_Toc50744336)

[4.2.12 [KCB] Committment to impartiality 20](#_Toc50744337)

[4.3 Liability and Financing 20](#_Toc50744338)

[4.3.1 [KCB] Liability protection 20](#_Toc50744339)

[4.3.2 [KCB] Financial stability 20](#_Toc50744340)

[4.3.3 [KCB] Managing termination of service 20](#_Toc50744341)

[4.4 Non-discriminatory Conditions 21](#_Toc50744342)

[4.5 Confidentiality 21](#_Toc50744343)

[4.5.1 [KCB] Confidential information 21](#_Toc50744344)

[4.5.2 [KCB] Release of confidential information 22](#_Toc50744345)

[4.5.3 [KCB] Confidentiality of sources 22](#_Toc50744346)

[4.6 Publicly Available Information 22](#_Toc50744347)

[5 STRUCTURAL REQUIREMENTS 24](#_Toc50744348)

[5.1 Organization of structure and top management 24](#_Toc50744349)

[5.1.1 [KCB] Safeguard impartiality 24](#_Toc50744350)

[5.1.2 [KCB] Organizational hierarchy 24](#_Toc50744351)

[5.1.3 [KCB] Assigned responsibilities 24](#_Toc50744352)

[5.1.4 [KCB] Rules 26](#_Toc50744353)

[5.2 Mechanism for safeguarding impartiality 27](#_Toc50744354)

[5.2.1 [KCB] Impartiality adherence 27](#_Toc50744355)

[5.2.2 [KCB] Documented mechanism 27](#_Toc50744356)

[5.2.3 [KCB] KIBoD authority 27](#_Toc50744357)

[5.2.4 [KCB] Interested parties 28](#_Toc50744358)

[6 RESOURCE REQUIREMENTS 29](#_Toc50744359)

[6.1 Certification Body Personnel 29](#_Toc50744360)

[6.1.1 General 29](#_Toc50744361)

[6.1.2 Management of Certification Process Personnel Competence 29](#_Toc50744362)

[6.1.3 Contracts with Certification Personnel 31](#_Toc50744363)

[6.2 Audit resources 31](#_Toc50744364)

[6.2.1 Internal Resources 31](#_Toc50744365)

[6.2.2 External Resources (Outsourcing) 32](#_Toc50744366)

[7 PROCESS REQUIREMENTS 34](#_Toc50744367)

[7.1 General 34](#_Toc50744368)

[7.1.1 [KCB] Recognized Certification Schemes 34](#_Toc50744369)

[7.1.2 [KCB] Convey scheme requirements 34](#_Toc50744370)

[7.1.3 [KCB] Preparation for scheme services 34](#_Toc50744371)

[7.1.4 [KCB] Preparation for scheme services 35](#_Toc50744372)

[7.2 Application 35](#_Toc50744373)

[7.3 Application Review 35](#_Toc50744374)

[7.3.1 [KCB] Required application information 35](#_Toc50744375)

[7.3.2 [KCB] Verify requested certification 36](#_Toc50744376)

[7.3.3 [KCB] Justify certification service 36](#_Toc50744377)

[7.3.4 [KCB] Deny requested certification 36](#_Toc50744378)

[7.3.5 [KCB] Allowed omissions 37](#_Toc50744379)

[7.4 Audit 37](#_Toc50744380)

[7.4.1 [KCB] Certification management plan 37](#_Toc50744381)

[7.4.2 [KCB] Certification personnel 37](#_Toc50744382)

[7.4.3 [KCB] Certification resources 38](#_Toc50744383)

[7.4.4 [KCB] Certification performance 38](#_Toc50744384)

[7.4.5 [KCB] Recognized Certification Schemes 38](#_Toc50744385)

[7.4.6 [KCB] Notification of non-conformities 38](#_Toc50744386)

[7.4.7 [KCB] Degree of non-conformity 39](#_Toc50744387)

[7.4.8 [KCB] Application withdrawal 39](#_Toc50744388)

[7.5 Review 40](#_Toc50744389)

[7.5.1 [KCB] Review team 40](#_Toc50744390)

[7.5.2 [KCB] Documented recommendation 40](#_Toc50744391)

[7.6 Certification Decision 40](#_Toc50744392)

[7.6.1 [KCB] Decision responsibility 40](#_Toc50744393)

[7.6.2 [KCB] Decision basis 40](#_Toc50744394)

[7.6.3 [KCB] Decision impartiality 41](#_Toc50744395)

[7.6.4 [KCB] CB’s control 41](#_Toc50744396)

[7.6.5 [KCB] Requirement fulfillment 41](#_Toc50744397)

[7.6.6 [KCB] Notification of decision 41](#_Toc50744398)

[7.7 Audit Reports & Certification Documentation 41](#_Toc50744399)

[7.7.1 [KCB] Certification documentation 41](#_Toc50744400)

[7.7.2 [KCB] Certification moniker 42](#_Toc50744401)

[7.7.3 [KCB] Release of certification 42](#_Toc50744402)

[7.8 Directory of Certified Services 42](#_Toc50744403)

[7.9 Surveillance 43](#_Toc50744404)

[7.9.1 [KCB] Surveillance requirement 43](#_Toc50744405)

[7.9.2 [KCB] Surveillance frequency 43](#_Toc50744406)

[7.9.3 [KCB] Product marking 44](#_Toc50744407)

[7.9.4 [KCB] Ongoing surveillance 44](#_Toc50744408)

[7.10 Changes Affecting Certification 44](#_Toc50744409)

[7.10.1 [KCB] Managing scheme changes 44](#_Toc50744410)

[7.10.2 [KCB] Managing changes 44](#_Toc50744411)

[7.10.3 [KCB] Notifying required changes 45](#_Toc50744412)

[7.11 Termination, Reduction, Suspension or Withdrawal of Certification 45](#_Toc50744413)

[7.11.1 [KCB] Addressing non-conformities 45](#_Toc50744414)

[7.11.2 [KCB] Resolving non-conformities 45](#_Toc50744415)

[7.11.3 [KCB] Recording certification status changes 46](#_Toc50744416)

[7.11.4 [KCB] Communicating certification status changes 46](#_Toc50744417)

[7.11.5 [KCB] Suspension resolution 46](#_Toc50744418)

[7.11.6 [KCB] Reinstating certification 46](#_Toc50744419)

[7.12 Records 47](#_Toc50744420)

[7.12.1 [KCB] Create records 47](#_Toc50744421)

[7.12.2 [KCB] Classify and protect records 47](#_Toc50744422)

[7.12.3 [KCB] Retain records 47](#_Toc50744423)

[7.13 Complaints and Appeals 48](#_Toc50744424)

[7.13.1 [KCB] Processes 48](#_Toc50744425)

[7.13.2 [KCB] Process steps 48](#_Toc50744426)

[7.13.3 – 7.13.9 inc. [KCB] Complaints & appeals 49](#_Toc50744427)

[8 MANAGEMENT SYSTEM REQUIREMENTS 50](#_Toc50744428)

[8.1 General 50](#_Toc50744429)

[8.1.1 [KCB] Establish a Management System 50](#_Toc50744430)

[8.1.2 Management System Requirements 50](#_Toc50744431)

[8.1.3 [KCB] Optional IS9001 50](#_Toc50744432)

[8.2 Documentation 50](#_Toc50744433)

[8.2.1 [KCB] Fulfillment of IS17065 50](#_Toc50744434)

[8.2.2 [KCB] KCMC’s commiment 50](#_Toc50744435)

[8.2.3 [KCB] Management System administration 50](#_Toc50744436)

[8.2.4 [KCB] Link MS and IS17065 51](#_Toc50744437)

[8.2.5 [KCB] Access to MS information 51](#_Toc50744438)

[8.3 Required Documentation 51](#_Toc50744439)

[8.3.1 [KCB] Document control 51](#_Toc50744440)

[8.3.2 [KCB] Document control measures 51](#_Toc50744441)

[8.4 Control of Records 52](#_Toc50744442)

[8.4.1 [KCB] Record storage 52](#_Toc50744443)

[8.4.2 [KCB] Record retention and access 52](#_Toc50744444)

[8.5 Management Review 52](#_Toc50744445)

[8.5.1 General 52](#_Toc50744446)

[8.5.2 Review inputs 53](#_Toc50744447)

[8.5.3 Review outputs 53](#_Toc50744448)

[8.6 Internal Audits 54](#_Toc50744449)

[8.6.1 [KCB] Internal audit procedures 54](#_Toc50744450)

[8.6.2 [KCB] Internal audit programme 54](#_Toc50744451)

[8.6.3 [KCB] Internal audit frequency 54](#_Toc50744452)

[8.6.4 [KCB] Internal audit conduct 54](#_Toc50744453)

[8.7 Corrective Actions 55](#_Toc50744454)

[8.7.1 [KCB] Correcting non-conformities 55](#_Toc50744455)

[8.7.2 [KCB] Eliminating non-conformities 55](#_Toc50744456)

[8.7.3 [KCB] Corrective action proportionality 55](#_Toc50744457)

[8.7.4 [KCB] Corrective action procedures 55](#_Toc50744458)

[8.8 Preventive Actions 55](#_Toc50744459)

[8.8.1 [KCB] Preventing non-conformities 55](#_Toc50744460)

[8.8.2 [KCB] Preventive action proportionality 56](#_Toc50744461)

[8.8.3 [KCB] Preventive action procedures 56](#_Toc50744462)

[9 REVISION HISTORY 57](#_Toc50744463)

[10 ANNEX I - DERIVED POLICY - IDENTITY ASSURANCE CERTIFICATION SCHEME 58](#_Toc50744464)

# INTRODUCTION

## Scope

This document sets out the Kantara Certification Body’s (KCB) Policy & Practices for the competent, consistent and impartial operation of those Certification Schemes recognized under this Policy (see §7.1.1).

## Authority

Authority for the KCB to be formed and for the Kantara Certification Management Committee (KCMC), as the applicable ‘top management’, to document and ensure the application of the obligations in this Policy arises from a Kantara Initiative Board of Directors (KIBoD) Charter, “KCB Charter”, at its latest issued version.

IS17065: §7.6.4

The KCMC SHALL be responsible for the establishment, documentation, maintenance and fulfilment of this Policy iaw IS17065 and SHALL ensure its objectives are acknowledged and implemented across all elements of the KCB.

IS17065: §8.2.1

The KCMC’s Chairperson SHALL be appointed in accordance with the authority granted by the “**KCB Charter**”.

The KCB Management & Operations Manual, §x, defines the role and responsibilities of the KCMC Chairperson.

## Interested Parties

This document is required reading for:

1. all KCMC Members and Kantara Initiative staff/employees/ contractors associated with fulfilment of this Policy’s objectives; and
2. applicant and approved Auditors and applicant and certified Credential Service Providers.

It will also be of interest to those wishing to gain a detailed knowledge of how the KCB approaches the operation of the certification schemes which are recognized herein (see §7.1.1), and to the KCB’s Accreditors and Internal Auditors.

IS17065: ‘Introduction’, §5.2, §8.5.2

## Key words

The modal verbs "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", and "MAY", when used in capitals within this Specification, are to be interpreted as described hereafter.

1. SHALL This means that the statement is an absolute requirement of this specification;
2. SHALL NOT This means that the statement is an absolute prohibition of this specification;
3. SHOULD This means that there may exist valid reasons in particular circumstances to ignore a particular item, but the full implications must be understood and carefully weighed before choosing a different course;
4. SHOULD NOT This means that there may exist valid reasons in particular circumstances when the particular behavior is acceptable or even useful, but the full implications must be understood and the case carefully weighed before implementing any behavior described with this label;
5. MAY This means that an item is truly optional. One party may choose to include the item for a particular reason while another party may omit the same item. An implementation which does not include a particular option SHALL be prepared to interoperate with another implementation which does include the option, though perhaps with reduced functionality. In the same vein an implementation which does include a particular option SHALL be prepared to interoperate with another implementation which does not include the option (except, of course, the feature for which the option provides).

## Effectiveness

This document MAY be applied immediately upon its publication.

It SHALL become fully effective from the first day of the fourth month following the month of its publication (notionally a minimum 90-day period), whereupon application of this document SHALL be mandatory and any preceding versions SHALL be withdrawn from public access unless clearly marked as being ‘WITHDRAWN” if left available in the public domain, e.g. for reference purposes.

## Review and Approval

The KCMC SHALL review this document as a whole:

1. whenever it is revised to accommodate any material changes which are determined to be necessary;
2. at least annually, by the end of the month of publication of any version resulting from material changes; and
3. whenever the KCMC becomes aware of any circumstances which may require modification of its service assessment operational practices, including at the request of its Accreditation Body.

Following its review of this document, and subsequent to a formalized vote, the KCMC SHALL approve this document, stating an effective date from which it SHALL be conformed-with.

IS17065: §5.1.3 a)

## Changes in this revision

None – this is the first release.

## Document structure

Policy directives, and Practice applied to fulfill those policy directives, are both set out in a manner which distinguishes clearly between them, with the intention to ensure the applicable directives are met in a competent, consistent and impartial manner

Demonstration of conformity to [IS17065] for the purposes of facilitating the KCB’s accreditation against [IS17065] is accomplished primarily by adopting the structure of that international standard in clauses §4 to §8 inclusive of this Policy.

Clauses 4 to 8 inclusive follow the structure and employ the same or minimally-modified headings as those found in [IS17065]. Where additional headings are used in this document, these are clearly identified as being specific to this document by the heading title (if one is used) being preceded by ‘[KCB]’. The inclusion of additional headings does not perturb the sequencing of headings and clause numbering, hence alignment to IS17065 is ensured. Similarly, if a clause is determined not to apply it bears the phrase ‘[no stipulation]’ with a justification, so as to retain that alignment.

Policy directives are expressed in the paragraph style employed by this present paragraph.

Practice statements are expressed in the paragraph style employed by this present paragraph.

Cross-references to applicable [IS17065} clauses are expressed in the following style: IS17065: §«clause ref(s).»

Where there are variants in the choice of English spelling, this Policy and all derived documents SHALL utilize with consistent rigour the usage applied to ISO/JTC 1/SC 27 publications.

# REFERENCES

The following referenced documents are normative and therefore indispensable in the context of this document*.*

ISO/IEC 17020:2012, Conformity assessment — Requirements for the operation of various types of bodies performing inspection

ISO/IEC 17065:2012, Conformity assessment — Requirements for bodies certifying products, processes and services

IdA-01-010, Identity Assurance Certification Scheme – Policy & Practices Handbook

The following referenced documents are informative in the context of this document*.* For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO/IEC 17000:2020, Conformity assessment — Vocabulary and general principles

ISO/IEC 17067:2013, Conformity assessment — Fundamentals of product certification and guidelines for product[*i.e. service*] certification schemes

# TERMINOLOGY

## Kantara-wide terms

Excepting those terms defined in §3.2 below, all other special terms and abbreviations used in this document are defined either in the applicable ISO publications or in the KCB Glossary & Overview. Additional terms may be defined in glossaries specific to any certification schemes recognized under this policy.

Although IS17065 uses both ‘evaluation’ and ‘audit’, apparently synonymously, this policy uses only the term ‘audit’.

## Terms defined for this document

### iaw

‘in accordance with’, i.e. to perform the described function according to the policy, rules or required actions of the referenced clause (of this document) or of another referenced document.

### Recognized Certification Scheme

One of the certification schemes recognized in §7.1.1 as being a scheme under which the KCB is accredited for the provision of certification services.

## Implicit usage

### ‘The KCB’

Normative references to the Kantara Certification Body as ‘the KCB’ within this policy and derived practice documents SHALL refer to qualities and functions of the KCB as an organizational entity which may have persons and entities other than its Management Committee representing it or actually fulfilling obligations on its behalf. However, the normative obligation to see that such policy intentions are fulfilled falls upon the KCB’s top management, i.e. the KCMC.

### ‘The KCMC’

Normative references to the Kantara Certification Management Committee as ‘the KCMC’ within this policy and derived practice documents SHALL, by implication, assign the normative obligation directly upon the KCMC and no other body or person, such that the KCMC, whilst being free to delegate its responsibilities, retains the ultimate responsibility at all times, unless that responsibility is specifically re-assigned by this Policy (exclusively, and not by any derived documents, practices, etc.). Clauses referring to the KCMC SHALL, at a minimum, correspond to those in which the requirements of IS17065 explicitly refer to ‘top management’ or to the ‘management’ of the certification body, i.e. the management of the KCB.

# GENERAL

## Legal and contractual matters

### Legal responsibility

Kantara Initiative Incorporated (KI) SHALL be the legal entity under which the KCB is operated.

The Kantara Certification Body shall be given standing as a self-governing organizational entity within KI under the terms of a Charter granted by the KIBoD.

So, the Charter must give its mandate to the KCB, establish the initial KCMC and require that thereafter the KCMC be operated under the terms of its Charter and of a Policy which the KCMC shall develop, maintain and operate iaw the requirements of IS17065, so as to attain and maintain accreditation against that standard.,

The “KCB Charter”, dated 2020-mm-dd, gives standing to the KCB and to the KCMC and requires that the KCMC administers the KCB in accordance with the terms of its Charter and this Policy, which the KCMC shall own.

IS17065: §7.6.4

### Certification agreement

#### [KCB] Enforceable agreement

The KCB SHALL establish with each certification applicant a legally enforceable agreement governing the provision of its certification services. This agreement SHALL take into account the responsibilities of the KCB, the certification applicant and any other pertinent parties, and SHALL account for any specifics of the applicable **Recognized Certification Schemes** (see §7.1.1).

IS17065: §4.1.2.1

Prior to being accepted for a certification audit the applicant CSP is required to agree to the terms of the **Certification and License Agreement (CLA)** – see the **Service Certification Handbook (SCH)** - which is applicable during the period of their application and whilst undergoing audit, for the duration of their certification, and (to the extent that certain applicable clauses continue to apply), following the termination of their Certification.

#### [KCB] Compliance requirements

The CSP agreement SHALL require the CSP’s compliance with at least the following items, as a condition of establishing and/or maintaining their certification under the applicable certification scheme(s):

1. fulfillment of the certification requirements, including implementing appropriate changes when they are communicated by the KCMC, be that of the KCMC’s determination or as a result of changes to the certification scheme requirements;
2. the ongoing fulfillment of the certified service’s policy and service definition;
3. provision of all necessary arrangements for service:
   1. the conduct of the audit (initial and surveillance), including provision for the auditor’s examination of documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and CSP's subcontractors;
   2. investigation of complaints;
   3. the participation of observers, which the KCB may itself from time to time require or be required to include, in order to ensure the integrity of certification services and the KCB’s own accreditation;
4. the CSP’s claims regarding certification be consistent with the scope of its service’s certification;
5. the CSP does not use its service certification in such a manner as to bring the KCB into disrepute and does not make any statement regarding its service certification that the KCB may consider misleading or unauthorized;
6. upon suspension, withdrawal, or termination of certification, the CSP discontinues its use of all advertising matter that contains any reference thereto and takes action as required by the certification scheme (e.g. the return of certification documents) and takes any other required measure, such that;
7. if the CSP provides copies of the certification documents to others, the documents shall be reproduced in their entirety or as specified in the certification scheme;
8. in making reference to its service certification in communication media such as documents, brochures or advertising, the CSP complies with the requirements of the KCB or as specified by the certification scheme;
9. the CSP complies with any requirements that may be prescribed in the certification scheme relating to the use of marks of conformity, and on information related to the service;
10. the CSP keeps a record of all complaints made known to it relating to compliance with certification requirements or those specified for the applicable certification scheme and makes these records available to the KCB when requested, and:
    1. takes appropriate action with respect to such complaints and any deficiencies found in services that affect compliance with the requirements for certification;
    2. documents the actions taken;
11. the CSP informs the KCB, without delay, of changes that may affect its ability to conform with the certification requirements.

IS17065: §4.1.2.2

The terms of the **CLA** address each of the above items a) to k) inclusive in §9999.

### Use of license, certificates and marks of conformity

#### [KCB] Control of marks

The KCB SHALL exercise control over use and display of certificates, and marks and claims of service conformity which indicate that a service is certified, as required by this Policy, including those controls required by the recognized certification schemes identified in §7.1.1.

IS17065: §4.1.3.1

The terms of the **CLA** address how a CSP SHALL be permitted to use, display and claim matters relating to its certification (§9999).

#### [KCB] Protection of marks

The KCB SHALL document and apply suitable action in the event that incorrect references to the certification scheme, or misleading use of certificates or claims of service conformity, are found in the CSP’s documentation or other materials, as necessary to protect the value and assurances granted under by the KCB.

The terms of the **CLA** address how the KCB SHALL handle imcorrect/improper use of certification marks etc. (§9999).

IS17065: §4.1.3.2

## Management of impartiality

### [KCB] Impartiality

The KCB SHALL act with complete impartiality in the performance of its certification activities.

This is inherently established in the [KCB Mngt&Ops] §4.2 through the specific processes required.

IS17065: §4.2.1

### [KCB] Risks to impartiality

The KCB SHALL be responsible for identifying potential risks to its impartiality, taking into consideration such factors as commercial, financial or other pressures, from its relationships, or from the relationships of its personnel, when considering what steps it should take to ensure that its impartiality is not compromised.

This is accomplished in the risk identification process described in the [KCB Mngt&Ops] §4.2, which defines specific process stages at which risks to impartiality should be considered and includes steps to be taken with a formalized impartiality risk assessment and record pro forma.

IS17065: §4.2.2

### [KCB] Review of risks to impartiality

The KCB SHALL review the potential risks to its impartiality on an ongoing basis. This shall include, *inter alia*, those risks that arise from its activities, from its relationships, or from the relationships of its personnel (see §4.2.12).

This is accomplished in the risk identification process described in the [KCB Mngt&Ops] §4.2, which defines specific process stages at which risks to impartiality should be considered and identifies a comprehensive but not exhaustive set of potential soure of risks to impartiality.

IS17065: §4.2.3  
 IS17020: §4.1.3

### [KCB] Mitigating risks to impartiality

If the KCB identifies an actual risk to its impartiality it SHALL demonstrate and record how it mitigates the risk. Records of its risk identification and remediation SHALL be made available to the KIBoD, in its function as defined in §5.2.1 and §5.2.3.

This is accomplished in the risk identification process described in the [KCB Mngt&Ops] §4.2, which defines specific process stages at which risks to impartiality should be considered and identifies a comprehensive but not exhaustive set of potential mitigation measures to reduce the likelihood or impact of risks to impartiality.

IS17065: §4.2.4  
 IS17020: §4.1.4

### [KCB] Committment to impartiality

Each KCMC Member, and all other personnel having a role in the management and conduct of certification services, shall express their commitment to acting in a fully impartial manner.

IS17065: §4.2.5

This is accomplished through the requirement for all contracts of employment to address the need for impartiality and the contractual requirement for a commitment to impartiality. In the specific case of the KCMC this is addressed in §«tbd» of the **KCB Member Agreement**, which requires the signatory to indicate their commitment to complete impartiality (and confidentiality) throughout the life-cycle of the certification process. The [KCB Mngt&Ops] §4.2 describes required practices which demonstrate how this commitment is to be achieved.

### [KCB] Prohibited services

Neither the KCB (when providing certification services) nor its Approved Auditors (when providing audit services under the scope of the KCB) SHALL:

1. [no stipulation] [*IS17065 clause inapplicable*];
2. [no stipulation] [*IS17065 clause inapplicable*];
3. design, implement, supply or maintain any element of the subject service;
4. offer or provide any form of consultancy or internal audit to the CSP owning or operating the subject service or any material constituent of that service, other than:
5. to explain the applicability of certification criteria or their origin references; or
6. to provide pre-assessment guidance as to whether specific certification criteria can be met by a proposed solution, which SHALL extend only so far as to indicate the points of any failure to fufill requirements but SHALL NOT propose how the failure may be remedied;
7. [no stipulation] [*IS17065 clause addressed by the above*].

IS17065: §4.2.6

The **KCB Charter** strictly limits the nature of services which the KCB may offer so as to exclude those stated.

These are also reflected in the [KCB Mngt&Ops] §4.2 which also states which types of services ARE permitted. Furthermore the **Approved Auditor Agreement (A3)** expressly limits the nature of services which the Auditor may offer to CSPs seeking its services as their Certification Auditor, so as to exclude those services stated above but equally to permit those services stated in [KCB Mngt&Ops] §4.2.

### [KCB] Preservation of impartiality

All contracts or agreements, etc., established with third parties SHALL impose upon them the same impartiality requirements as are borne through this policy by the KCB.

IS17065: §4.2.7  
IS17020: §4.2 et seq.

The **Approved Auditor Agreement (A3)** expressly imposes impartiality requirements upon the auditors which sign-up to it.

The [KCB Mngt&Ops] §4.2 also makes provision for ensuring that contracted parties are both assessed for any risk to impartiality as well as being obligated to committing to preserve the KCB’s impartiality when undertaking work on its behalf or which may have an impact on such work

### [KCB] Segregation of responsibilities

The KCMC SHALL have no involvement in any activities performed by Approved Auditors.

Likewise, Approved Auditors SHALL have no authority in the management determinations of the KCB, nor in any of its activities, with particular reference to the KCMC’s responsibility for review of certification matters and its decision-making activities.

IS17065: §4.2.8

The **Approved Auditor Agreement (A3)** expresses such limitations on the extent of activities in which the KCMC and Approved Auditors may have any involvement in the other party’s activities.

### [KCB] Non-affiliation of services

The KCB SHALL NOT offer consultancy services itself, nor promote, market or otherwise endorse or recommend any consulting services of another organization.

The [KCB Mngt&Ops] §4.2, expressly limits the extent of the KCB’s activities and these are similarly limited by ...

IS17065: §4.2.9

### [KCB] Prohibited services

Neither KCMC Members nor Approved Auditor personnel may act in any certification or auditing roles if, in the preceding two years they have provided any consultancy or like services to any organization which is receiving certification services.

IS17065: §4.2.10

Both the **KCMC** Members Agreement and the A3 include a provision (§xxx and §yyy, respectively) prohibiting such practices for two years prior to acting in their respective roles and which also invalidate such individuals’ participation if provision of such practices is undertaken in any manner which compromises their continued impartial participation.

### [KCB] Review of impartiality risks

The KCMC SHALL perform its own review of risks to impartiality of any organizations and personnel involved in certification activities which it manages and SHALL take action to mitigate the risks identified.

There SHALL also be a mechanism by which interested parties can bring such risks to the KCMC’s attention.

IS17065: §4.2.11

Both the **AAH** and **SCH** have steps in the process of evaluating applicant auditors and service providers respectively which ensure that an impartiality assessment is undertaken prior to reviewing each application for acceptability. See clauses §xxx and §yyy, respectively.

### [KCB] Committment to impartiality

See §4.2.5.

IS17065: §4.2.12

## Liability and Financing

### [KCB] Liability protection

The KCMC SHALL make arrangements for the provision and maintainance of such protection as is necessary to protect its liabilities in proportion to the extent of certification services rendered and the committee’s perceived exposure.

IS17065: §4.3.1

The **KIBoD** maintains in place General Liability and Errors & Omissions insurance cover with a $5,000,000 limit which includes the operation of the KCB. The KIBoD’s CFO is responsible for having in place and keeping record of these covers.

### [KCB] Financial stability

The KCMC SHALL maintain a budgetary plan and working reserves such that it is able to continue to operate its certification services.

IS17065: §4.3.2

The **KCMC** maintains operational accounts and executes budgetary controls to ensure that the provision of certification services and management of certification records is maintained. The KCB’s Treasurer has responsibility for retention and management of fiduciary records.

### [KCB] Managing termination of services

In the event that the KCB is unable to continue to provide and maintain its certification services the KCMC SHALL make arrangements with other interested parties, including its chosen Accreditation Body, to manage the termination of then-existing certifications.

This is an entirely elective statement (though I’d recommend it as a revision to the IS, since it strikes me as being eminently sensible) – but how to realize it? Perhaps only to have a clause in the KCB Op Manual which requires certain steps, tbd at the time, but defining the considerations to be taken?

## Non-discriminatory Conditions

Access to the KCB’s certification services SHALL be open to organizations of any size or type, or to individuals, which meet the requirements of the Recognized Certification Schemes (see §7.1.1). Access to certification services SHALL NOT be subject to any impediments or limitations to access other than those necessarily imposed by the applicable certification scheme requirements.

IS17065: §4.4 et seq.

Requirements upon applicants seeking to become either approved auditors of or holders of certifications under any of Recognized Certification Scheme operated by the KCB are subject only to such limitations as may be technically-imposed by the recognized schemes. The **AAH** and **SCH** respectively define these processes and make reference to the related application pro formae. Certain of these obligations are carried-through via the **A3** so as to not to permit Approved Auditors to apply any such limitations.

## Confidentiality

### [KCB] Confidential information

The KCMC SHALL document and apply in any agreement with a third party associated with the provision or consumption of its certification services a comprehensive Mutual Non-Disclosure (and Confidentiality) Agreement (MNDA), prior to any material exchange of information with the third party.

The **KCB MNDA** is a comprehensive set of terms which meet this requirement and which provide comprehensive protection for both the KCB and the party with which it is entering into an agreement. This MNDA is a prerequisite to any material exchange of information between the parties to the agreement and is cited in each of the **KCMC Members’ Agreement**, **A3** and **CLA**.

This MNDA SHALL be applied consistently to all qualifying third parties except where the KCMC is unavoidably obliged to adopt another party’s documented terms, in which case the KCMC SHALL ensure that the other party’s MNDA provides at least for the same terms as the KCB’s own agreement.

Its application is invoked by both the **AAH** and the **SCH**, in addition to which the **KCB** **Management & Operations Manual** addresses any instance where the third party has a preferred set of terms to which the KCMC is inclined to grant acceptance, subject to coverage of all of the provisions of its own MNDA.

If the KCMC seeks any information from the third party with the intention of publishing that information in any manner beyond itself and the subject third party the KCMC SHALL give the third party such notice at the time of collection of the information in question but MAY offer the third party an option to prohibit such publication, where such a prohibition does not conflict with any other provisions of this policy.

IS17065: §4.5.1  
IS17020: $4.2.1

Where information is gathered from third parties, the intention to use this for wider publication is clearly stated – this is stated in the **KCB** **Management & Operations Manual**. See also **AAH** §xxx and **S3A** §yyy.

### [KCB] Release of confidential information

The KCMC SHALL ensure that the terms of its MNDA allow it to cooperate with law-enforcement, regulatory and like bodies where compelled to do so with the proviso that, unless prohibited by such bodies from doing so, it gives the third party reasonable notice such that it may launch an appeal, should it so choose.

IS17065: §4.5.2  
IS17020: $4.2.2

The **KCB MNDA** includes such a provision (see §4.5) and this is reinforced by the **KCB** **Management & Operations Manual**.

### [KCB] Confidentiality of sources

The KCMC SHALL treat any information received about the third party from other sources as being subject to the provisions of the MNDA, except that the identity of the source shall also be held in confidence.

IS17065: §4.5.3  
IS17020: $4.2.3

The **KCB MNDA** includes such a provision – see §4.5.

## Publicly Available Information

The KCMC SHALL maintain and make available through readily-accessible means the following information:

1. for each Recognized Certification Scheme (see §7.1.1), a comprehensive general description of the scheme including references to where further information can be found concerning application, audit, management of certification under the applicable scheme and where a handbook describing or further referencing all applicable procedures/process can be accessed;

Information on all recognized schemes is provided via the KCB’s home page («https://kantarainitiative.org/KCB/») and also on this specific landing page: «https://kantarainitiative.org/KCB/certification\_schemes». Management of these pages is covered in the **KCB Management & Operations Manual.**

1. applicable fees and other information concerning the KCB’s funding mechanisms;

Information on the KCB’s general funding mechanisms is provided via the KCB’s home page («https://kantarainitiative.org/KCB/») and fees concerning certification schemes is provided on the scheme-specific landing page: «https://kantarainitiative.org/KCB/fiscal». Management of these pages is covered in the **KCB Management & Operations Manual.**

1. terms of use relating to approvals and certifications associated with the KCB and its certification schemes;

General information on usage of marks associated with the recognized certification schemes is provided via the KCB’s home page («https://kantarainitiative.org/KCB/») and full terms are provided in both the **A3** and the **CLA**. Management of these pages is covered in the **KCB Management & Operations Manual.**

1. a complaints/appeals procedure.

Information on the complaints/appeals procedure is provided via the KCB’s home page («https://kantarainitiative.org/KCB/») forms / submission portal can be found on the specific landing page: «https://kantarainitiative.org/KCB/complaints&appeals». Management of these pages is covered in the **KCB Management & Operations Manual.**

Process for handling appeals is provided in each of the **AAH** and **SCH**, and is supplemented in the **KCB Management & Operations Manual**, §7.13.

IS17065: §4.2.4

# STRUCTURAL REQUIREMENTS

## Organization of structure and top management

### [KCB] Safeguard impartiality

Management of all certification activities SHALL be conducted so as to safeguard impartiality, in accordance with the provisions of §4.2.

IS17065: §5.1.1  
IS17020: $4.1.5

The practices described in §4.2 describe how this requirement is fulfilled.

### [KCB] Organizational hierarchy

The KCMC SHALL document its organizational and management hierarchy, indicating all material duties, responsibilities and authorities of all parties associated with its certification services, including with other entities not directly under its authority or control.

the **KCB Management & Operations Manual** describes the structure of the KCB, its relationship to other entities, both within and without Kantara Initiative, and also the key roles with the Body – see §x.y.z.

IS17065: §5.1.2

### [KCB] Assigned responsibilities

Overall authority and responsibility for the following functions SHALL be vested in the KCMC which SHALL be responsible for:

1. at least an annual review, approval and publication of the KCB’s operating policy (this document);

This is mandated by §1.6 of this document and the document itself will record its history of revisions and approvals (see §9), which can also be found in records of the KCB’s meetings which are maintained by the Secretariat.

IS17065: §5.1.3 a)

1. supervision of the implementation of this policy’s provisions and associated processes and procedures;

Adherence to documented practices such as the **KCB Management & Operations Manual**, **AAH**, **SCH**, and others cited elsewhere in this document show the KCB’s direct participation in these practices, or in its oversight of those to whom responsibilities and authorities are delegated. This is also shown in the establishment of agreements with third parties before material transactions are conducted (e.g., **MNDA**, **A3**, **CLA**).

IS17065: §5.1.3 b)

1. supervision of the KCB’s finances;

This is conducted by the KCB’s Treasurer iaw the **KCB Management & Operations Manual**.

IS17065: §5.1.3 c)

1. development and operation of the Certification System;

the **KCB Management & Operations Manual** determines the process by which the KCMC determines that it would be in the KCB’s interests to grant recognition to a specific certification scheme, how approval to do so is sought from the KIBoD and how, if approved by the KIBoD, to then incorporate it into the KCB’s certification services. The **AAH** and **SCH** document the procedures which must be observed in the operation of those services and records of the KCMC’s meetings, and of its certification audit review processes will demonstrate the implementation of these measures. See also practices described in §, 0, 7.4.8, 7.6 per items f), g), h) (below).

IS17065: §5.1.3 d)

1. liaison with the owners of Recognized Certification Schemes (see §7.1.1) who SHALL be considered as the final authorities concerning the development and publication of their respective certification scheme requirements;

IS17065: §5.1.3 e)

[check this paragraph with prior versions – should it be part of e) or is it an f??]This is addressed in the **KCB Management & Operations Manual** for KCB participants and in the specific scheme requirements regarding auditors for the respective Recognized Certification Schemes (see §7.1.1).

.IS17065: §5.1.3 e)

1. operation of audit services iaw the requirements of §7.4;

The practices described in §7.4 describe how this requirement is fulfilled.

IS17065: §5.1.3 f)

1. review of audits and associated certification recommendations iaw the requirements of §7.5;

The practices described in §7.5 describe how this requirement is fulfilled.

IS17065: §5.1.3 g)

1. review of certification decisions iaw the requirements of §7.6;

The practices described in §7.6 describe how this requirement is fulfilled.

IS17065: §5.1.3 h)

1. delegation of authority to committees or personnel for specific purposes, which shall be of limited duration and subject to periodic review;

The **KCB Management & Operations Manual** describes how ad hoc

committees and working groups should be established and operated in §xxx.

IS17065: §5.1.3 i)

1. establishment of contracts and agreements with KCB Members, Auditors, organizations subject to certification audits and certification scheme owners;

The following documents fulfill these needs: **KCMC Members’ Agreement**, **A3**, **CLA**.

IS17065: §5.1.3 j)

1. availability of adequate KCB resources, and their appropriate assignment;

Editing team’s note: - who’s problem is this? Should it be in the KCB Management & Operations Manual? Not sure about this – one option could be included in a Job Description for an assigned KCB Member.

IS17065: §5.1.3 k)

1. responding to complaints and appeals, as initiated using the published mechanisms (see §7.13);

The practices described in §4.6 d) describe how this requirement is fulfilled.

IS17065: §5.1.3 l)

1. ensuring the competence of personnel involved within the KCB and in its auditors;

This is addressed in the **KCB Management & Operations Manual** for KCB participants and in the specific scheme requirements regarding auditors for the respective Recognized Certification Schemes (see §7.1.1).

IS17065: §5.1.3 m)

1. oversight and operation of the KCB’s management system in accordance with the requirements of §8.

The practices described in §8 describe how this requirement is fulfilled.

IS17065: §5.1.3 n)

### [KCB] Rules

#### [KCB] Member election

The KCMC SHALL establish rules by which members are:

1. appointed and released;
2. recused, as circumstances require;
3. identified and invited to participate in order to ensure a balanced representation, such that no single interest predominates.

the **KCB Management & Operations Manual** describes the procedures to be followed when electing a Chairman of the KCMC and when appointing members of the Committee. It also described procedures for recusal of members when the impartiality of process needs to be ensured, and for the release of members, whether by requested or voluntary resignation or expiration of term of office.

IS17065: §5.1.4

#### [KCB] Voting rights

Each Member of the KCMC shall have one vote which SHALL be used according to the following voting rules in all KCMC formal functions (i.e., regular and extraordinary meetings, review of auditor approval and service certification applications, etc.)

1. For the approval of auditors and certification of services the KCMC shall require a Super Majority (75%) of all non-recused voting members;
2. For all other decisions, the KCMC shall use Simple Majority quorum rules (i.e. more than 50% of non-recused voting members).

#### [KCB] Committees And Working Groups

When the KCMC creates and assigns persons to any *ad hoc* committees and working groups it shall do so using a procedure which:

1. follows a documented process;
2. assigns a leader for the body in question;
3. requires the creation of a formal scope, terms of operation;
4. ensures that persons assigned to the body in question act with impartiality and without external influences at all times;
5. ensures that persons assigned to the body in question are subject to a confidentiality agreement.

The applicable procedure SHALL ensure that at all times the KCMC retains authority over who serves on any short-term committees and working groups and SHALL also have the authority to modify or terminate the body in question.

IS17065: §5.1.4

The process for establishing, operating and having oversight over any working groups or sub-committees which are required, including provisions for recusal of Members, is addressed in the **KCB Management & Operations Manual** in §5.1.3.1 h) and §5.1.4.3.

IS17065: §5.1.4

#### [KCB] Specialist Support

The KCMC may invite specialists to support as needs dictate but shall ensure that the role of such specialists is well-defined, limited in scope and duration, and does not create any conflict of interest for the Committee. Such supporting specialists shall have no voting rights and all decisions based on the specialist’s inputs shall be determined solely by the Committee.

The process for inviting specialists to provide guidance, expert witness or other specialist input to the KCMC, or such working groups or sub-committees as it sees fit to authorize, is addressed in the **KCB Management & Operations Manual** in §xxx.

IS17065: §5.1.4

## Mechanism for safeguarding impartiality

### [KCB] Impartiality adherence

The KCMC SHALL adhere to the provisions of the KCB Charter regarding its obligations towards the KIBoD to safeguard the KCB’s impartiality.

IS17065: §5.2.1

The processes by which the KCB inter-acts with the KIBoD in its capacity as the ‘impartiality mechanism’ is described in the **KCB Management & Operations Manual** in §xxx, in conformity with the KCB Charter.

### [KCB] Documented mechanism

[no stipulation - *§5.2.1 addresses this*].

IS17065: §5.2.2

### [KCB] KIBoD authority

The KCMC SHALL implement all steps and measures which are required by the KIBoD to ensure the impartiality of the KCB’s operations, and SHALL report their completion to the KIBoD.

Should such actions be in conflict with the KCB’s policies, operating practices or other obligations to which it is subject, the KCMC SHALL advise the KIBoD of the nature and circumstance of the conflict and its inability to comply with the KIBoD’s requirements.

Note – thus, this policy returns the problem to the KIBoD which should have its own process for resolving the conflict and further advising the KCMC.

IS17065: §5.2.3

The processes by which the KCMC inter-acts with the KIBoD in its capacity as the ‘impartiality mechanism’ is described in the **KCB Management & Operations Manual** in §xxx.

### [KCB] Interested parties

[no stipulation]. Editor’s note: This appears to be a flawed requirement, since the CB could ‘colour’ the constitution of the mechanism which is empowered to over-rule and report against it. Doesn’t this IS17065 clause itself create a conflict of interest? Write it into the Charter, i.e. have the KIBoD give itself that authority?

IS17065: §5.2.4

# RESOURCE REQUIREMENTS

## Certification Body Personnel

### General

#### [KCB] Personnel resources

The KCB SHALL define the responsibilities it requires to manage and operate each of the Recognized Certification Schemes (see §7.1.1) and arrange for sufficient personnel to fill them.

IS17065: §6.1.1.1

The **KCB Management & Operations Manual** describes the process by which the roles within the KCB itself are defined, filled, and the terms and conditions affecting those roles. It also describes the prcesses by which auditors are evaluated and approved. The AAH describes processes by which auditor organizations and their audit personnel are evaluated.

#### [KCB] Personnel competences

The KCB shall define the knowledge, skills and competences for each of the roles it requires, where necessary accounting for any specific requirements of each of the Recognized Certification Schemes (see §7.1.1).

IS17065: §6.1.1.2

The **KCB Management & Operations Manual** describes the roles and competences required within the KCB itself. The IACS-RAKS describes the knowledge and skill requirements for auditor organizations and their audit personnel.

#### [KCB] Maintain confidentiality

[no stipulation - superseded by §4.5].

IS17065: §6.1.1.3

### Management of Certification Process Personnel Competence

#### [KCB] Management of competences

The KCB SHALL document the process by which it manages the competences of those personnel involved with the provision of certification services. This process SHALL:

1. determine the competences required of the personnel and how to determine fulfilment of those requirements;
2. identify any specific training or experience necessary and where such training may be available to a standard recognized by the KCB;
3. establish that personnel possess the defined competencies;
4. monitor the performance of the personnel over time.

IS17065: §6.1.2.1

The MOM, **C** and the AAH document these processes.

#### [KCB] Record personnel

The KCB SHALL maintain records of each approved audit organization and its audit-qualified personnel.

The following information SHALL be recorded and maintained for each approved audit organization:

1. organizational name and address, with name of a primary and secondary point of contact;
2. contact details for the personnel identified in b);
3. date on which this information was last reviewed and confirmed as correct.

The following information SHALL be recorded and maintained for each auditor which the approved audit organization provides to perform audits:

1. individual name and address, with contact details;
2. position held in the audit organization;
3. educational qualification and professional status;
4. experience and training;
5. evidence of the individual’s competence;
6. results of performance monitoring and audit;
7. audit authorizations granted by the KCB;
8. date on which this information was last reviewed and confirmed as correct.

IS17065: §6.1.2.2

The **KCB Management & Operations Manual** describes the process by which the roles within the KCB itself are defined, filled, and the terms and conditions affecting those roles. It also describes the prcesses by which auditors are evaluated and approved. The AAH describes processes by which auditor organizations and their audit personnel are evaluateddescribes how records are kept, what infprmation those records hold and which elelemnts of the records are confidential between the KCB and the aApproved audit organizations and which elements my be made public (e.g. through the KCB’s TLS).

### Contracts with Certification Personnel

#### [KCB] Binding agreement

Each member of the KCMC, whether directly involved in the review of certification applications or acting in a supporting role, SHALL sign a binding agreement by which they commit themselves to:

1. comply with all requirements of this policy and the derived processes and procedures;
2. declare any prior or existing association with any certification applicant ;
3. declare any circumstance which might present a conflict of interest or otherwise impair their impartiality and objectivity towards the execution of their duties as a member of the KCMC.

IS17065: §6.1.3, §7.6.5

This is required by the KCB Charter, stated as process in the KCB Management & Operations Manual and effected through the KCMC Members’ Agreement.

#### [KCB] Risks to impartiality

The KCB SHALL use information provided under §6.1.3.1 when identifying risks to impartiality in the provision of its certification services. In particular, when forming a panel to review an application for auditor approval or service certification the KCB members shall each review any risk to tjheir impartiality in the the context of the specific applicant, and shall recuse themselves when identified risks cannot be reasonable mitigated. the review panel SHALL be formed by the remaining non-recused KCMC Members.

IS17065: §6.1.3

This is required by the KCB Charter, stated as process in the KCB Management & Operations Manual and effected through the KCMC MNDA and the KCMC Members’ Agreement.

## Audit resources

### Internal Resources

The KCB SHALL be responsible for the overall planning of audits, in accordance with §7.4. All audit resources SHALL be externally sourced in accordance with §6.2.2.

IS17065: §6.2.1

The practices implemented for the overall planning of audits are those described in §7.4.x.

### External Resources (Outsourcing)

#### [KCB] Meeting IS17020

The KCB SHALL establish a process for assessing applicants (organizations and individuals) for the role of auditors which ensures that the applicants meet the applicable requirements of ISO/IEC 17020, including the impartiality requirements of that International Standard.

IS17065: §6.2.2.1

The **AAH** defines the process for assessing potential auditors which addresses some of the requirements of IS17020. The **A3** also includes provisions for ensuring conformity to IS17020 or passes-on such an obligation to the applicant auditor. The A3 includes annotations which demonstrate the conformance with IS17020 clauses.

Explanatory note for the record, until such time as it becomes redundant: iaw email from David Musselwhite, Product Mgr / Dep Quality Mgr, IAS, 2019-12-13 “If your scheme does not require and [sic] accredited inspection agency, then ISO/IEC 17065 only requires that the entity doing the inspection (internal or external) “…**shall** meet the applicable requirements of ISO/IEC 17020”.”

#### [KCB] Non-independent bodies

[no stipulation - no outsourcing to non-independent bodies takes place].

IS17065: §6. 2.2.2

#### [KCB] auditor contract

The KCB SHALL have a legally-binding contract with its auditors, including provisions for confidentiality and conflict of interest as specified in 6.1.3.1 c).

IS17065: §6. 2.2.3

The **A3** fulfills this requirement.

#### [KCB] auditor oversight

The KCB SHALL:

1. accept full responsibility for the activities which it contracts to its approved auditors;
2. ensure that at all times the provisions for impartiality and confidentiality are not compromised;
3. document all applicable policies and procedures relating to the assessment and ongoing monitoring of its approved auditors and retain records of such activities;
4. maintain and publish a list of approved auditors;
5. have a documented process for handling any breaches of the contract required by §6.2.2.3 or of any other requirements in §6.2.2.

IS17065: §6. 2.2.4

The **KCB Management & Operations Manual** and the **AAH** fulfill this requirement, with the additional satisfaction of item d) being through the publication of the TSL (see «<https://kantarainitiative.org/KCB/trust_status_list/>»).

# PROCESS REQUIREMENTS

## General

### [KCB] Recognized Certification Schemes

The KCB SHALL only recognize and offer certification services under the following adopted Certification Schemes:

1. Identity Assurance Certification Scheme – ref [IACS-PPH]: see Annex I.

*IS17065*: §7.1.1

The KCB maintains a statement on its public web site as to which schemes are recognized at any given time, with such additional information as seems appropriate, available at «<https://kantarainitiative.org/KCB/certification_schemes/>».

Prior to offering certification services against any particular certification scheme the KCMC SHALL:

1. ensure that it has in place all the competences and capabilities required to do so, including its ability to assess applicants for the role of auditors, and
2. receive documented approval from the KIBoD to proceed with the provision of the specified services.

IS17065: §7.3.1 e)

The [MOM] describes the process for determining the viability of adopting Certification Schemes.  
The KCB Secretariat maintains a register of communications between the KCMC and the KIBoD in which such presentation to and approvals (or other relevant communications) from the Board are retained.

### [KCB] Convey scheme requirements

In the provision of certification services under any of the Recognizd Certification Schemes (see §7.1.1), the KCB SHALL itself meet and SHALL convey to the subject CSPs all requirements of the applicable recognized certification scheme(s).

IS17065: §7.1.2, §8.4.2

The MOM defines the general principles and these are further developed in the SCH. The terms of the **CLA** address the requirements for Certification across all Recognized Certification Schemes though each Certified Service is subject to a discrete CLA which states the CSP’s choice of applicable scheme.

### [KCB] Preparation for scheme services

The KCB SHALL prepare such materials as it deems necessary to ensure that all parties involved with certification services offered against any of the Recognized Certification Schemes (see §7.1.1) are fully informed and have the tools needed to effectively execute their role within the overall certification process for the specified scheme.

IS17065: §7.1.3

With regard to the Identity Assurance Certification Scheme: the processes involved are described in the **AAH** and the **SCH (Service Certification Handbook)**. These reference further documents from the ICAS which define the required auditor knowledge and skills and the audit criteria. The KCB’s **A3** and **CLA** bind the participants to the processes and requirements.

### [KCB] Provision of scheme services

The provision of certification services offered against any of the Recognized Certification Schemes (see §7.1.1) SHALL follow the processes and apply the stated criteria for each applicable scheme, including for the provision of scheme auditors. In the event that any certification scheme fails to provide explicit requirements in terms of application of and assessment under the scheme, the KCB SHALL define its own practices necessary to ensure fulfilment of its obligations under this policy and derived processes and procedures.

IS17065: §7.1.3

The general processes involved are described in the **KCB Management & Operations Manual** which also addresses (in Annexes) the specific application of those processes for each Recognized Certification Scheme.

## Application

The KCMC SHALL ensure that it obtains from each certification applicant the information required to be able to operate and deliver the certification services in accordance with the requirements of each Recognized Certification Scheme (see §7.1.1).

IS17065: §7.2

With regard to the Identity Assurance Certification Scheme: the processes involved are described in the **AAH** and the **SCH** and these in turn refer to pro formæ used for collecting information required from Auditors and CSPs.

The Recognized Certification Schemes identified in §7.1.1 of this Policy are listed at «https://kantarainitiative.org/KCB/certification\_schemes».

## Application Review

### [KCB] Required application information

The KCMC SHALL ensure that the information obtained through meeting §7.2:

1. is sufficient for the provision of the certification service;
2. is consistent with the manner of operation of the certification scheme;
3. has a clear and concise description of the scope of the specific certification.

IS17065: §7.3.1 a) – c)

With regard to the Identity Assurance Certification Scheme: the **SCH** describes the process by which this information is gathered from CSPs and reviewed. Applications for certification services, the S3A and the SoC comprehensibly address the provision of the information necessary for the performance of a certification audit.

The KCMC SHALL further ensure that, for the services being sought, it has available the required resources. After allowing for the potential recusal of KCMC Members (see §6.1.3.2) the KCB SHALL ensure that it has a minimum number of Members able to form a Review Team. In the event that this minimum cannot be achieved the KCMC Chairperson SHALL be empowered to co-opt a sufficient number of additional personal as Members of the KCMC so long as:

1. they are engaged under the same terms as are all other Members of the KCMC; and
2. their tenure is strictly limited in scope and duration only to prosecute the review for which they have been co-opted.

IS17065: §7.3.1 d)

The [KCB MOM] states what the minimum With regard to the Identity Assurance Certification Scheme: the KCB will be aware of the forthcoming certification from the initial application and subsequently as surveillance and renewal audits are required and can schedule its own resources accordingly. CSPs are required to independently contract with an Approved Auditor.

### [KCB] Verify requested certification

The KCMC SHALL ensure that the scope of certification being sought falls within one of its Recognized Certification Scheme (see §7.1.1) and that there are auditors available and qualified to perform the required audit(s).

IS17065: §7.3.2

The MOM describes the broad principles to be followed, though these may differ according to scheme. With regard to the Identity Assurance Certification Scheme: the process of approving Auditors determines their competence at the time of assessment. Changes to the scheme will be brought to the KCB’s attention prior to any formal change to a scheme’s requirements and the A3 also requires the Approved Auditor to declare any elements within the scope which are to be included in the assessment but are not part of the defined scheme. It is not anticipated that this would arise to any significant degree, given the nature of this scheme and how it is owned/managed.

### [KCB] Justify certification service

[no stipulation - superseded – see §7.1.1, §7.3.2].

IS17065: §7.3.3

### [KCB] Deny requested certification

In the event that a CSP seeks a certification wherein the scope is beyond that of their designated certification scheme and the KCB cannot see an acceptable means to fulfil the application the KCB SHALL decline to undertake the certification as requested.

IS17065: §7.3.4

With regard to the Identity Assurance Certification Scheme: such is written into the operating procedure *defined in the SCH.*

### [KCB] Allowed omissions

The KCMC SHALL only allow the omission of any activity in the course of providing a certification service if the applicant claims that:

1. it relies on certifications which the KCMC has already granted, either to the applicant for the applicable certification service, or has already granted to another applicant, on whose certification the existing applicant is reliant; or
2. there is a reasoned argument for a non-applicability which is in accordance with the specific scope of the audit, while also remaining within the broad scope and entitlements granted by the applicable scheme.

In the latter case, the KCMC and/or its auditor SHALL find the argument for the non-applicability to be acceptable under the terms described in b).

IS17065: §7.3.5

With regard to the Identity Assurance Certification Scheme: such is written into the operating procedures defined in the AAH and SCH.

## Audit

*Note – Though IS17065 uses the terms ‘Evaluation’ and ‘Audit’ apparently synonymously, this Policy document uses ‘audit’ exclusively throughout, hence this clause’s title, versus the title ‘Evaluation’ given in IS17065.*

### [KCB] Certification management plan

The KCMC SHALL publish a plan with which to manage its certification activities.

IS17065: §7.4.1

An overall plan is established in the MOM and is further developed according to the Recognized Certification Schemes being operated at any given time. With regard to the Identity Assurance Certification Scheme, this is effectively the operating procedure defined in the **Service Certification Handbook (SCH)**.

### [KCB] Certification personnel

The KCMC SHALL assign those KCB Members and support staff necessary to provide its certification services.

IS17065: §7.4.2

An overall plan is established in the MOM and is further developed according to the Recognized SCertification Schemes being operated at any given time. With regard to the Identity Assurance Certification Scheme, this is effectively the operating procedure defined in the **Service Certification Handbook (SCH)**.

### [KCB] Certification resources

The KCMC SHALL ensure that its assignees are provided with all necessary procedures, documentation, certification-specific information &c. to allow them to perform their certification service responsibilities.

IS17065: §7.4.3

The MOM provides this at the higher level. With regard to the Identity Assurance Certification Scheme: the process for this is described in the **KCB Management & Operations Manual**.

### [KCB] Certification performance

The KCMC SHALL perform its assigned responsibilities, including oversight of its approved auditors, in accordance with the requirements of the applicable certification scheme and its own internal processes &c. to support the applicable scheme.

IS17065: §7.4.4

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **KCB Management & Operations Manual** and the **SCH**.

### [KCB] Acceptable Other Assessment Results

The KCMC SHALL only accept audit reports having findings based on reliance on prior certifications if that certification was:

1. granted by the KCB in accordance with this policy, subject to the prior certification remaining current; or
2. granted by a body accredited under an ISO-defined accreditation process recognized by the KCB; or
3. granted by any other body or schema recognized by the KCB;
4. in accordance with such furthher limitations as the KCM may see fit to apply according to any particular Recognized certification Scheme.

IS17065: §7.4.5

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **KCB Management & Operations Manual** and the **SCH**.

### [KCB] Notification of non-conformities

The KCB SHALL establish processes which ensure that any non-conformities identified during the course of an audit are notified to the certification applicant.

IS17065: §7.4.6

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **AAH**.

### [KCB] Degree of non-conformity

The KCB SHALL define what degree of non-conformity SHALL be considered to be of such a severity as to render the outcome of the certification process to be a certain denial of a grant of certification. The KCB SHALL qualify this general statement for each of its Recognized Certification Schemes (see §7.1.1), as necessary.

In instances such as that above, the Auditor SHALL notify the applicant in clear terms as to which are the specific Recognized Certification Scheme requirements which they must address in order to eradicate or to mitigate to an acceptable level the non-conformity.

IS17065: §7.4.7

The default scope of Minor and Major non-conformities is described in the **SCH, §3.4.2**.

### [KCB] Application withdrawal

The KCB SHALL consider an application for certification to be voided/withdrawn if the applicant elects not to, or is unable to, eradicate or mitigate any identified non-conformities. In the case of eradication or mitigation, such sub-clauses of this §7.4 as may need to be reapplied SHALL be so applied until there are no longer any remaining severe non-conformities.

IS17065: §7.4.8

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **SCH**. (But see Editing Team’s note above) Note that in the case of IACS services, the determination of severity is delegated largely to the auditor, although the KCB shall have to accept a final disposition prior to making its decision as to whether or not to grant certification.

### [KCB] Application records

At the conclusion of an audit there SHALL be produced a documented record of all pertinent information regarding the conduct and the outcome of the audit.

IS17065: §7.4.9

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **MOM**, which requires that an Approved Auditor’s Report be produced.

## Review

### [KCB] Review team

The KCB SHALL form a Review Team for the purposes of reviewing an applicant’s submitted audit reports and other information pertinent to the audit and for making a determination as to whether or not to grant Certification. The members of the Review Team SHALL be formed by Members of the KCB and SHALL NOT have been participants in the audit.

IS17065: §7.5.1, §7.6.3

Pricncipally in the MOM. With regard to the Identity Assurance Certification Scheme: the process for this is described in the **SCH**, which has specific clauses (ref. them) for selecting team members and for members’ recusal where necessary. The decision as to certification is addressed in §7.6.

### [KCB] Documented recommendation

The KCB’s review team shall determine whether or not to recommend certification and their recommendation shall be documented.

§9 a) of the **KCB Charter** requires a Super-majority for all certification decisions, and this is underpinned by the KCB MOM.

IS17065: §7.5.2

## Certification Decision

### [KCB] Decision responsibility

The KCMC SHALL bear full responsibility for its decision as to whether or not to grant Certification (see §7.5.1) and SHALL communicate this decision to the applicant without undue delay.

IS17065: §7.6.1

The process for this is described in the **MOM**, in §999, which requires that the provisions of any specific scheme be taken into consideration on the execution of this process..

### [KCB] Decision basis

In arriving at its certification decision, the KCMC SHALL take into account all information related to the audit, the KCB Review Team’s recommendation, and any other relevant information.

IS17065: §7.6.1, ’.2

The process for this is described in the **MOM**, in §999, which requires that the provisions of any specific scheme be taken into consideration on the execution of this process. Moreover, §9 a) of the **KCB Charter** requires a Super-majority for all certification decisions.

### [KCB] Decision impartiality

The KCMC SHALL at all times fulfil the requirements of §5.1.4 and §7.4 of this policy.

IS17065: §7.6.3

The applicable practices are described in §5.1.4 and §7.4.

### [KCB] CB’s control

[no stipulation - superseded by §1.2].

IS17065: §7.6.4

### [KCB] Requirement fulfillment

[no stipulation - superseded by §6.1.3.1 a)].

IS17065: §7.6.5

### [KCB] Notification of decision

When notifying a certification applicant of a certification decision the KCB SHALL identify, and justify as necessary, its decision.

IS17065: §7.6.6

With regard to the Identity Assurance Certification Scheme: the process for this is described in the **SCH**, in §999.

## Audit Reports & Certification Documentation

7.7.0 [KCB] Audit Reports

The KCB SHALL require Audit Reports to convey, at a minimum:

1. sufficient information to allow its Review Team to make a decision as to whether or not to grant Certification; and
2. sufficient information to allow the KCB to prepare its formal certification documentation.

The AAH describes auditor practices and the requirements upon them for furnishing the KCMC with audit findings in its Kantara Assessor’s Report and supporting material.

### [KCB] Certification documentation

The KCB SHALL provide formal certification documentation which conveys, at a minimum, the following information:

1. the KCB’s full name and postal address;
2. the date on which certification is granted;
3. the certification applicant’s full name and postal address;
4. the scope of the certification:
5. the scope of service for which the certification is granted;
6. the applicable certification scheme; and
7. the standard(s) and other normative document(s), including their version or date of publication, to which it is judged that the service conforms.
8. the date on which the certification being granted will terminate;
9. any qualifications and/or conditions which must be maintained or fulfilled to ensure the validity of the certification until its stated date of termination (see above);
10. the specific certification scheme under which the certification is granted (see §7.1.1).

IS17065: §7.7.1

The **KCB Management & Operations Manual** describes the preparation, communication and publication (through the publication of the TSL - see «<https://kantarainitiative.org/KCB/trust-status-list/>») of certification information.

### [KCB] Certification moniker

Formal certification documentation SHALL be signed by the KCB Chairperson or their designee, should the Chairperson be recused..

IS17065: §7.7.2

The **KCB Management & Operations Manual** requires same and describes the process for formalizing and publishing certification.

### [KCB] Release of certification

Formal certification documentation SHALL not be issued until:

1. a positive certification decision has been recorded; and
2. the certification applicant has signed the Certification Agreement required under §4.1.2.

IS17065: §7.7.3

The **KCB Management & Operations Manual** defines steps leading to formal signature and transmission to the certification applicant. Certification services are not offered unless the CLA has been signed and no certificate will be issued unless there has been a positive outcome from the certification decision process (per **SCH**). Unsuccessful certification decisions are communicated to the applicant but not through any form of certification.

## Directory of Certified Services

The KCB SHALL, as a minimum, publish the following information concerning each certification it has granted:

1. the identification of the certified service;
2. the identity of the organization which operates the certified service;
3. the certification applicant’s full name and postal address;
4. the applicable certification scheme under which the audit was performed (see §7.1.1).;
5. the scope of the certification:
6. the scope of service for which the certification is granted;
7. the applicable certification scheme; and
8. the standard(s) and other normative document(s), including their version or date of publication, to which it is judged that the service conforms.
9. the date on which certification is granted;
10. the date on which the certification being granted will terminate, or has been terminated, once that date has lapsed without renewal;
11. any other information required to be published according to the applicable certification scheme (see d), above).

IS17065: §7.8

The **KCB Management & Operations Manual** defines the information that has to be collated for publication and the means of publication, This includes the generic information (items a) to g) inclusive and also any items which are specifically required by the applicable certification scheme. item (h). This information is published openly through the TSL (see «<https://kantarainitiative.org/KCB/trust-status-list/>»).

## Surveillance

### [KCB] Surveillance requirement

Surveillance SHALL be conducted as required by the applicable certification scheme (see §7.1.1.).

IS17065: §7.9.1

The MOM defines required general practices which SHALL also accommodate scheme-specific requirements.

### [KCB] Scheme surveillance requirements

When a specific certification scheme requires audit, review or certification decision such activities all SHALL be performed in accordance with the applicable requirements of §7.4, §7.5 and §7.6 respectively.

IS17065: §7.9.2

With regard to the Identity Assurance Certification Scheme: the ACR process is effectively a small-scale normal certification audit and hence all those stages are observed.

### [KCB] Product marking

[no stipulation - this policy does not address the certification of products]

### [KCB] Ongoing service surveillance

Certified services shall be subject to surveillance at least annually to ensure the provider’s ongoing fulfillment of adherence and conformance to the KCB’s requirements and those which are specific to the applicable Recognized Certification Scheme (see 7.9.1, ’.2).

IS17065: §7.9.2, ’9.4

The MOM describes the process for handling Annual Conformity Reviews, which SHALL take into consideration of requirements which are scheme-specific.

## Changes Affecting Certification

### [KCB] Managing scheme changes

Changes to any applicable certification schemes SHALL be assessed and commensurate changes made to how the KCB performs certification against the subject scheme. Where these changes have an effect upon certification applicants or those organizations currently holding certifications, such changes SHALL be communicated to those organizations.

In communicating such changes, the KCB SHALL advise organizations holding certifications what actions are required of them in response to the changes and how the KCB will verify implementation of such changes.

IS17065: §7.10.1

The **KCB Management & Operations Manual** describes how liaison with Recognized Certification Schemes (see §7.1.1.) shall be maintained and how changes within those schemes are assessed and responsive actions are determined. The **SCH** describes how changes are to be accommodated within the normal triennial cycle of full and surveillance assessments.

### [KCB] Managing changes

#### [KCB] Managing certified service changes

The KCB SHALL ensure that organizations holding certifications are obligated to notify the KCB of any changes to their services which might affect the validity of their certifications.

IS17065: §7.10.2

Such requirements are included in the **SCA**.

#### [KCB] Managing other changes

The KCB SHALL, at least annually, consider other factors which may affect its certification services and act accordingly to account for such factors and communicate them as necessary.

IS17065: §7.10.2

Such a requirement is included in the **KCB Management & Operations Manual**.

### [KCB] Notifying required changes

All actions required of organizations holding certifications SHALL be communicated and conducted in accordance with the preceding requirements of this Section (§7), to the extent necessary to maintain the integrity of process and assurances delivered through the KCB’s certification services.

IS17065: §7.10.3

The **KCB Management & Operations Manual** provides process to manage such actions, including the revision of other documents, such as Handbooks, should that be necessary.

With regard to the Identity Assurance Certification Scheme: the SCH describes processes for un-scheduled assessments, where needs demand it, and for the inclusion of changes as may be dictated by the certification scheme itself.

## Termination, Reduction, Suspension or Withdrawal of Certification

### [KCB] Addressing non-conformities

When the KCB becomes aware of a non-conformity with a certification it SHALL, accounting for the requirements of the applicable certification scheme, determine the appropriate action, from:

1. continuation of certification, subject to specified conditions;
2. [no stipulation];
3. suspension of certification, pending completion of remedial actions by the certified organization;
4. withdrawal (revocation) of certification, including if the certified organization declines to fulfill the KCB’s required actions in any other instance.

IS17065: §7.11.1

With regard to the Identity Assurance Certification Scheme: the **SCH** describes processes for handling such situations, see §xxx.

### [KCB] Resolving non-conformities

All remedial actions determined as a consequence of §7.11.1, above, SHALL be conducted in accordance with the preceding requirements of this Section (§7), to the extent necessary to maintain the integrity of process and assurances delivered through the KCB’s certification services.

IS17065: §7.11.2, ’11.5, ’11.6

With regard to the Identity Assurance Certification Scheme, The **SCH** describes processes for handling such situations, see §xxx.

### [KCB] Recording certification status changes

Whenever there is a change to the certification status of any granted certification, irrespective of the reason or nature of the change, the KCB SHALL ensure that all records, certification documentation and published information is promptly updated, in accordance with the requirements of the applicable certification scheme.

IS17065: §7.11.3

The **SCH** describes processes for handling such situations, see §xxx. The **SCH** also refers to the circumstances under which changes to certification status may be amended, but does not provide a descriptive process.

### [KCB] Communicating certification status changes

Whenever a change to certification status requires the certified organization [*Editor’s note: is ‘certification holder’ a better term?]* to take actions determined by the KCB, the KCB SHALL communicate all such actions to the certification holder, in accordance with the requirements of the applicable certification scheme.

IS17065: §7.11.4

The **SCH** refers to the circumstances under which changes to certification status may be amended, and providex a descriptive process for handling them.

### [KCB] Suspension resolution

[no stipulation - superseded by §7.11.2].

### [KCB] Reinstating certification

[no stipulation - superseded by §7.11.3].

## Records

### [KCB] Create records

The KCB SHALL retain such records as are necessary to show that its obligations under this policy, including *inter alia* those of any Recognized Certification Schemes (see §7.1.1), have been fulfilled.

IS17065: §7.12.1

The MOM prescribes the capture of such records, identifying which specific data pojts are to be captured, and the Information Retention Schedule defines the necessary retention periods according to information/record type.

### [KCB] Classify and protect records

The KCB SHALL ensure that records are classified according to their sensitivity and are stored, transmitted and processed/accessed accordingly.

IS17065: §7.12.2

Information Classification is defined in the **KCB Management & Operations Manual**, §xxx.

### [KCB] Retain records

Records SHALL be retained for a defined minimum period, determined as being the longest of:

1. for records which are embedded into the TSL, in perpetuity (effectively for the duration of the existence of the KCB as an Accredited Certification Body);
2. the duration of a full triennial cycle plus a further 36 months, where the records specifically relate to auditor approval or service certification;
3. any further requirement of any of the Recognized Certification Schemes (see §7.1.1);
4. any other legal, contractual or policy obligations;
5. otherwise eighteen months from the date of their creation.

In each of the above cases a further ‘buffer’ period of six months SHALL be allowed unless there is any explicit provision requiring immediate destruction of the records in question.

IS17065: §7.12.3

The Information Retention Schedule defines a minimum retention period of six months greater than the policy or certification scheme (to allow for any reasonable need within that period after a formal minimum period) and its provisions are reviewed whenever a certification scheme is adopted, revised or terminated to ensure that data are held for the minimum period commensurate with policy, certification scheme requirements and best practice[Note – at this stage there is no awareness of any legal or regulatory obligations having direct relevance to the KCB, though this will be reviewed on an ongoing basis. It is possible that legal or regulatory requirements may impinge upon the KCB through specific certification scheme requirements, e.g. where such apply to the scheme on account of sector or jurisdiction.

## Complaints and Appeals

### [KCB] Processes

The KCB SHALL establish and maintain documented processes for the receipt and processing of complaints and appeals concerning any aspects of its certification services and decisions related thereto.

IS17065: §7.13.1

The KCB’s Complaints & Appeals Procedure is defined in the KCB Management & Operations Manual, §xxx. Complaints and Appeals can be initiated through the KCB’s web site at «<https://kantarainitiative.org/KCB/whinge_here/>».

### [KCB] Process steps

The KCB processes for handling complaints and appeals concerning any aspects of its certification services SHALL include the following actions:

IS17065: §7.13.2

1. provision of a prompt acknowledgement to the complainant/appellant;

IS17065: §7.13.3

1. collation and verification, to the fullest extent practical, of all pertinent information concerning the complaint/appeal;

IS17065: §7.13.4

1. establishing a team to review the complaint/appeal which was not involved in the processes leading to the circumstances which gave rise to the complaint/appeal;

IS17065: §7.13.5

1. ensure that no member of the review team has any conflict of interest with any of the parties involved, nor that they have, within the two years preceding the date of the complaint/appeal, acted in any consultancy, contractor or employee capacity with any of the parties involved;

IS17065: §7.13.6

1. give formal notice of the outcome of the process and any follow-up action to the complainant/appellant;

IS17065: §7.13.7, ’13.8

1. take whatever additional actions are required to ensure that the complaint/appeal is resolved and closed.

IS17065: §7.13.9

The KCB’s Complaints & Appeals Procedure is defined in the KCB Management & Operations Manual, §xxx.

### – 7.13.9 inc. [KCB] Complaints & appeals

[no stipulation - superseded by §7.13.20.]

# MANAGEMENT SYSTEM REQUIREMENTS

## General

### [KCB] Establish a Management System

[no stipulation - the remainder of this §8 fulfills IS17065 Option A].

### Management System Requirements

The KCB SHALL establish, document and maintain a management system which serves to ensure the fulfilment of the obligations set out in this Policy. This management system SHALL, as a minimum, include the provisions cited in §8.2 to §8.8 inclusive and in the provisions cited in §7.13.

IS17065: §8.1.1  
IS17020: §8.1.2

The KCB Management & Operations Manual, §8, documents the Management System procedures etc.

### [KCB] Optional IS9001

[no stipulation - the requirements of this IS17065 section are addressed in the following clauses of this §8].

## Documentation

### [KCB] Fulfillment of IS17065

[no stipulation - superseded by §1.2].

### [KCB] KCMC’s commitment

[no stipulation - superseded by §8.5.1.1].

### [KCB] Management System administration

The KCMC’s Chairperson SHALL appoint a member of the KCMC who SHALL have both responsibility and authority to:

1. ensure that the practices necessary to fulfill the objectives of this Policy and the required Management System (MS) are established, implemented and maintained; and
2. report to the KCMC’s Chairperson on the performance of the management system and any need for improvement.

IS17065: §8.2.3

The KCB Management & Operations Manual, §8, describes the management review process, including the description and periodic assignation of these responsibilities.

### [KCB] Link MS and IS17065

All practices deployed to achieve fulfilment of this Policy’s requirements SHALL be fully inclusive of and inter-linked to the practices to be employed in its fulfilment of this Management System. Such records as are necessary to demonstrate accomplishment of this goal SHALL be retained. See also §1.2.

IS17065: §8.2.4

The KCB Management & Operations Manual is the principle source of practices employed to meet the requirements of this Policy, in full, and references other documents and practices as appropriate. Certain of those other documents are also referenced directly from the Practice statements in this P&PH.

The KCB Management & Operations Manual also identifies the activities for which records must be retained, who is responsible for their capture and who for their secure retention.

### [KCB] Access to MS information

This Policy and related Practices SHALL be available in full to all interested parties (see §1.3) notwithstanding the obligations herein for confidentiality and privacy over certain matters and information.

IS17065: §8.2.5

This Policy and Practices Handbook and the referenced KCB Management & Operations Manual, SCH, AAH are all publicly available documents. Information received or generated by the KCB which is considered to be confidential shall be handled with those restrictions in mind, in accordance with Policy and Practices.

## Required Documentation

### [KCB] Document control

The KCB SHALL establish procedures to control the documents (internal and external) that relate to the fulfilment of this International Standard.

IS17065: §8.3.1

KCB Management & Operations Manual holds the Document Control Procedures (§xxx).

### [KCB] Document control measures

The Document Control procedures SHALL ensure that documents:

1. are reviewed for fitness-for-purpose prior to being approved for application;
2. include a provision for their review and update either as circumstances demand or otherwise at least annually;
3. include a summary of changes and a unique version/revision status, including a record of each revision and the associated approval dates;
4. are available in their latest approved state to all interested parties;
5. are assigned a unique identifier and meaningful title;
6. of external origin are suitably identified and their distribution controlled when necessary;
7. are archived once superseded or withdrawn from use such that only latest (current) versions are available for general access.

The Document Control Procedures (§xxx) in the KCB Management & Operations Manual apply all these requirements and additionally describe pro forma document styles etc.

IS17065: §8.3.2

## Control of Records

### [KCB] Record storage

The KCB SHALL maintain a protected information storage capability which protects all material documents (including records) from deliberate or inadvertent change or unauthorized access. This storage capability SHALL be separate from any repository from which publicly-accessible documents are held. Information SHALL be protected when in transit according to its classification. Information SHALL be disposed of at the end of its useful life in accordance with a published Information Retention Schedule (see §7.12).

IS17065: §8.4.1

The Information Management Procedures (§xxx) in the KCB Management & Operations Manual address how information is handled at all stages during its life-cycle.

### [KCB] Record retention and access

[no stipulation - superseded by §7.12].

## Management Review

### General

#### [KCB] Review of MS

The KCMC SHALL, at least annually, hold reviews of the operation of the management system in its oversight of the certification services which it offers and SHALL retain record of these reviews. These reviews SHALL gauge the adequacy and effectiveness of practices employed to fulfil this Policy and SHALL determine and effect remediations where these are necessary.

The KCMC SHALL, in its review, ensure that the KCB continues to fulfill the requirements of IS17065, at its applicable publication date, such that continued Accreditation of the KCB is assured.

IS17065: §8.2.2, §8.5.1.1, ’5.1.2

The **KCB Management & Operations Manual**, §8, describes the management review process and the methodology for determining the adequacy and effectiveness of practices employed.

#### [KCB] MS review frequency

[no stipulation - superseded by §8.5.1.1].

### Review inputs

Inputs to the Management Reviews required by §8.5.1.1 SHALL include:

1. results of internal and external audits;
2. feedback from clients and interested parties related to the certification services which the KCB offers;
3. feedback from the KIBoD regarding its role towards safeguarding impartiality;
4. the status of preventive and corrective actions;
5. follow-up actions from previous management reviews;
6. the fulfilment of this Policy’s objectives;
7. changes that could affect the Management System;
8. status of any ongoing appeals and complaints, and of those resolved;
9. results of monitoring for any non-conformities identified in the operation of the KCB’s certification services.

IS17065: §8.5.2

The **KCB Management & Operations Manual** (KCB MOM), §8, describes the management review process and defines a pro forma agenda.

### Review outputs

Outputs from the Management Reviews required by §8.5.1.1 SHALL include:

1. actions to improve the effectiveness of the management system and its processes;
2. actions to the KCB’s practices to improve the effectiveness of achieving the requirements of this Policy, including any non-conformities identified (see §8.5.2 i));
3. resourcing needs.

IS17065: §8.5.3

The **KCB Management & Operations Manual**, §8, describes the management review process and defines a pro forma agenda.

## Internal Audits

Editing Team’s note – speak with IAS. We should investigate implementing, as our practice, an agreement with IAS that their annual surveillance audit fulfills this need, possibly at the expense of paying a bit more for it to cover a greater proportion of, perhaps the whole, operation, not just a 'surveillance' proportion of it. Practice statements in the KCB: MOM pending outcome of discussion to confirm this approach.

### [KCB] Internal audit procedures

The KCB SHALL ensure that an Internal Audit is performed at least annually, so as to verify that the requirements of [IS17065] are fulfilled and that the management system (see §8 overall) is effectively implemented and maintained.

IS17065: §8.6.1, ’6.3

The **KCB Management & Operations Manual**, §8.6, describes the management system internal audit programme.

### [KCB] Internal audit programme

Internal Audits SHALL account for results of previous audits, and changes in operations or the operating environment which merit particular focus. Application of audit resources SHALL be proportional to the significance of the importance of specific areas subject to audit.

IS17065: §8.6.2

The **KCB Management & Operations Manual**, §8.6, describes the management system internal audit programme.

### [KCB] Internal audit frequency

[no stipulation - superseded by §8.6.1].

### [KCB] Internal audit conduct

The KCB SHALL ensure that its Internal Audits:

1. are conducted by personnel knowledgeable in certification, auditing and the requirements of [IS17065];
2. are not conducted by personnel who would be auditing their own work;

The KCB SHALL further ensure that:

1. those responsible for operations in areas audited are informed of the outcome of the internal audit;
2. actions arising from Internal Audits are conducted in a timely and appropriate manner;
3. opportunities for improvement are identified and actioned but not so as to conflict with b), above.

IS17065: §8.6.4

The **KCB Management & Operations Manual**, §8.6, describes the management system internal audit programme, including responding to findings.

## Corrective Actions

### [KCB] Addressing non-conformities

The KCB SHALL establish a set of procedures to identify, manage, resolve and, where appropriate, eliminate the cause of non-conformities so as to prevent their recurrence.

IS17065: §8.7.1, ’7.2, ’8.1

The **KCB Management & Operations Manual**, describes these procedures in §8.7.

### [KCB] Eliminating non-conformities

[no stipulation - superseded by §8.7.1].

### [KCB] Corrective action proportionality

In determining corrective actions, such actions SHALL be appropriate to the impact of the non-conformity which has been identified.

IS17065: §8.7.3

The **KCB Management & Operations Manual**, includes in its §8.7 (see below) a means to ensure that corrective actions are proportional to the scale of non-conformities they are intended to resolve.

### [KCB] Corrective action procedures

The procedures referred-to in §8.7.1 SHALL account for:

1. the identification of non-conformities;
2. the determination of the root causes of non-conformities;
3. appropriate actions required to correct non-conformities;
4. where appropriate, actions required to prevent recurrence of non-conformities;
5. determining the urgency and hence timescale, of effecting remedial actions;
6. recording the results of corrective and preventive actions taken;
7. reviewing the effectiveness of corrective and preventive actions taken.

IS17065: §8.7.4, ’8.2, ’8.3

The KCB Management & Operations Manual, describes these procedures in §8.7.

## Preventive Actions

### [KCB] Preventing non-conformities

[no stipulation - superseded by §8.7.1].

### [KCB] Preventive action proportionality

[no stipulation - superseded by §8.7.4].

### [KCB] Preventive action procedures

[no stipulation - superseded by §8.7.4].

IS17065: §7.10.3, §7.12 (all of this SCH $6)

# REVISION HISTORY

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Vn. | Date | Status | Notes | Approved |
| 0.1.0 | 2019-11-16 | Draft | Initial draft – proof of concept | Editor |
| 0.2.0 | 2019-11-25 | Drafting revision | Following review by CW & RP | Editor |
| 0.3.0 | 2019-12-03 | Drafting revision | Amendments to reflect IS17020 | Editor |
| 0.4.0 | 2020-01-26 | Drafting revision | For ARB (proto KCB) review | Editor |
| 0.5.0 | 2020-08-04 | Drafting revision | For ARB (proto KCB) review | Editor |
| 0.6.0 | 2020-09-11 | Drafting revision | For ARB (proto KCB) review | Editor |
| 0.7.0 | 2021-03-09 | Drafting revision | For ARB (proto KCB) review | Editor |
| 0.7.1 | 2021-03-16 | Drafting revision | For ARB (proto KCB) review | Editor |

IS17065: §7.10.3

# ANNEX I - DERIVED POLICY - IDENTITY ASSURANCE CERTIFICATION SCHEME

The following clauses are established so as to ensure that the KCB’s certification operations regarding the Identity Assurance Certification Scheme (IACS) are conformant to the scheme-specific policy requirements.

The Identity Assurance Certification Scheme has its own web pages, for which the landing page is «https://kantarainitiative.org/IACS».

to be continued, pending completion of the IACS P&PH …