

ASI Witness Assessments Procedure

Version 1, June 2020

1. PURPOSE

This procedure describes ASI’s requirements for the conduct of Witness Assessments, which form part of the ASI Oversight Mechanism. The purpose of Witness Assessments is to ensure that ASI Accredited Auditing Firms use appropriate assessment methodologies, competent personnel, and impartially perform ASI Audits under their ASI Accreditation.

Drawing from the ISEAL Assurance Code¹, the relevant desired outcomes of the broader ASI Oversight Mechanism are that:

- **The ASI assurance system results in accurate assessments of compliance:**
 - The assurance system is implemented consistently
 - The assurance system is implemented competently
 - The assurance system is implemented impartially
- **Effectiveness and efficiency of the ASI assurance system are improved over time:**
 - Risks to the integrity of the assurance system are managed
 - The scheme owner is responsible for and makes improvements to the assurance system

2. SCOPE AND APPLICATION

ASI recognises that it carries overall responsibility for the effective functioning and ongoing improvement of the ASI assurance system. ASI retains the authority to define and oversee implementation of this procedure by the ASI Secretariat and other parties, including Witness Assessors, ASI Accredited Auditing Firms, ASI Accredited Auditors, ASI Members and other parties to Witness Assessments.

ASI Accredited Auditing Firms must provide all reasonable assistance to ASI, and procure that their ASI Accredited Auditors also provide all reasonable assistance to ASI, whenever requested by ASI to assist ASI to ensure the effective functioning and ongoing improvement of the ASI assurance system.

3. DEFINITIONS

Term	Definition
ASI Accreditation	A recognition by ASI of the necessary competence to carry out ASI Audits.
ASI Accredited Auditing Firm	A Conformity Assessment Body meeting ASI’s objective selection criteria and accredited to carry out ASI Audits.
ASI Accredited Auditor	A qualified person individually accredited by ASI who conducts ASI Audits on behalf of and under the responsibility of an ASI Accredited Auditing Firm.
ASI Accreditation Scope	The ASI Accreditation Scope is the extent to which an ASI Accredited Auditing Firm and/or ASI Accredited Auditor can conduct ASI Audits, defined by: <ul style="list-style-type: none"> • ASI Standards • Geographic Scope

¹ [ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards](#)
Relevant ISEAL Assurance Code clauses are 5.5.4 Evaluation of competency and 5.6.2 Auditor impartiality.

Term	Definition
	<ul style="list-style-type: none"> Aluminium Supply Chain Activities Relevant Knowledge Lead Auditor status
ASI Audit	Systematic, independent and documented process for obtaining and assessing objective evidence to determine the extent to which the requirements for ASI Certification are fulfilled by an ASI Member. Audit types include Certification Audits, Surveillance Audits and Re-Certification Audits. <i>See the ASI Assurance Manual for more information.</i>
ASI Certification	An attestation issued by ASI, based on the results of an ASI Audit by an ASI Accredited Auditing Firm, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.
ASI Secretariat	Individuals employed or contracted by ASI to carry out Secretariat functions for the organisation. This includes responsibility for implementation of the ASI assurance system, including the Oversight Mechanism as noted.
Board	ASI Board as defined in the ASI Constitution.
Member	An entity or group of entities that is a current member of one of ASI's six membership classes: <ul style="list-style-type: none"> Production and Transformation (eligible for ASI Certification) Industrial Users (eligible for ASI Certification) Civil Society Downstream Supporters Associations General Supporters
Oversight	Assessment of an assurance provider's demonstration of competence to carry out specific assurance tasks. <i>(adapted from ISO 17000, sourced from ISEAL Assurance Code V2.0)</i>
Witness Assessments	Observation conducted or arranged by ASI of an ASI Accredited Auditing Firm carrying out an ASI Audit within its ASI Accreditation Scope. <i>(adapted from ISO 17011: 2017 definition of 'witnessing')</i>
Witness Assessor	Person assigned by ASI to perform, alone or as part of an assessment team, a Witness Assessment of an ASI Accredited Auditing Firm. <i>(adapted from ISO 17011: 2017 definition of 'assessor')</i>

4. REFERENCES

- ASI Assurance Manual
- ASI Oversight Mechanism
- ASI Auditor Accreditation Procedure
- ASI Auditor Competence and Assessment Procedure
- ASI Complaints Mechanism
- ASI Audit Report Oversight Assessment Procedure
- ASI Management Review Procedure
- ASI Monitoring and Evaluation Plan
- ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards

- ISO/IEC 17011: 2017 *Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies.*

5. PROCEDURE

5.1. Process Overview

1. ASI Witness Assessments form part of the ASI Oversight Mechanism. They enable observation of the conduct of ASI Audits by ASI Accredited Auditing Firms to:
 - evaluate consistency with the requirements of the ASI Assurance Manual
 - evaluate competency and impartiality of the ASI Accredited Auditors
 - identify risks to the ASI assurance system
 - identify improvement opportunities for the ASI assurance system.
2. ASI Witness Assessment processes consists of five main stages, illustrated in Figure 1.

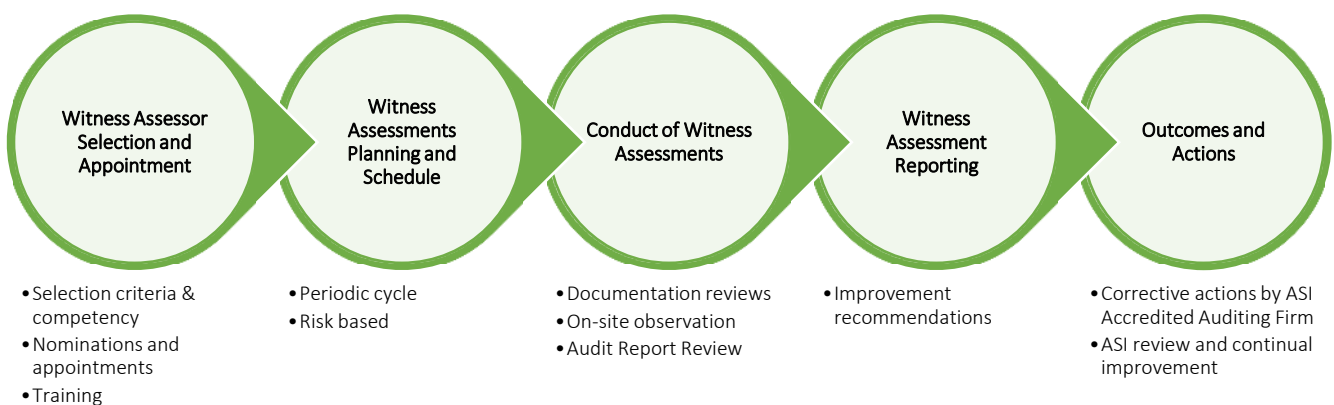


Figure 1 – ASI Witness Assessment processes

5.2. Stage 1 – Witness Assessor Selection and Appointment

3. Desired competencies and attributes of Witness Assessors include:
 - Experience with assurance, certification and/or accreditation systems
 - Experience with witness assessments or similar Oversight processes
 - Independence from ASI Accredited Auditing Firms and ASI Members that are to be subject to Witness Assessments
 - Knowledge of key topics relevant to the ASI Standards, such as those related to governance, environment and social issues, and/or chain of custody
 - Language competency in English and, where different, ideally the working language/s of the ASI Audit to be witnessed (or otherwise translation support)
 - Successful completion of required ASI training and assessment, the components of which will be set by the ASI Secretariat.

It is acknowledged that not every Witness Assessor will have each competency and attribute listed.

4. Potential candidates will be identified through a search process carried out by the ASI Secretariat. Supporting records such as resumés will be maintained on file.
 - Input will be periodically sought from the Indigenous Peoples Advisory Forum (IPAF) on potential candidates who are Indigenous or have relevant knowledge and experience working with Indigenous Peoples.
 - Members of the ASI Secretariat who meet the desired competencies and attributes in Section 3 are also eligible to be a Witness Assessor.
5. The ASI Secretariat will select a Witness Assessor/s for an individual Witness Assessment/s based on their relevant experience and the objectives of the Witness Assessment/s.
6. An ASI contract with a selected external Witness Assessor/s (where not a member of the ASI Secretariat) will be agreed and executed to formalise an appointment, and will cover:
 - Objectives, activities and outcomes of the Witness Assessment/s
 - Remuneration and coverage of reasonable expenses properly incurred
 - Confidentiality of ASI, Auditor and Member information
 - Other terms and conditions.

5.3. Stage 2 – Witness Assessments Planning and Scheduling

7. ASI aims to conduct a Witness Assessment of each ASI Accredited Auditing Firm every 3 years, or as required.
 - ASI Accredited Auditing Firms are expected to co-operate with ASI to support timely scheduling of Witness Assessments.
 - ASI will decide the priority of Witness Assessments on a risk-basis, which may be identified through ASI Oversight and other processes, including the ASI Complaints Mechanism.
 - Where an ASI Accredited Auditing Firm has no ASI Audits scheduled within the target timeframe, or other force majeure situations are in effect, it is acknowledged that a longer period between Witness Assessments will need to apply.
 - Planning for an ongoing program for Witness Assessments under this Procedure will commence in mid-2020.
8. The ASI Secretariat may set specific objectives for a Witness Assessment, which could include to assess one or more of:
 - Audit planning and conduct by an ASI Accredited Auditing Firm, against the requirements the ASI Assurance Manual
 - Competence and impartiality of ASI Accredited Auditors during the audit process, against the requirements of the ASI Auditor Accreditation Procedure
 - Quality of engagement with site personnel and key stakeholders during the audit process, including Indigenous Peoples where applicable
 - Alignment of Audit reporting with the on-site audit process and findings
 - Other objectives that may be identified.
9. The ASI Secretariat will nominate or appoint one or more individuals as part of a Witness Assessment team, which may include:
 - Witness Assessor/s
 - Technical expert/s, where relevant
 - Translator/s, where relevant

- ASI Secretariat, where relevant and not designated as a Witness Assessor/s
 - Other observer/s, where appropriate.
10. Planning and scheduling will be managed by the ASI Director of Assurance and ASI *elementAI* Manager, drawing on information about Self Assessments and ASI Audits in the audit pipeline as identified through *elementAI*. Variables of the ASI Audit that will be considered when scheduling include:
- ASI Standard (Performance Standard, Chain of Custody)
 - Audit Type (Certification, Surveillance, Scope Change, Re-Certification)
 - Supply chain activities
 - Location
 - Language
 - Timing.
11. The ASI Secretariat will liaise with the relevant ASI Member, ASI Accredited Auditing Firm and Witness Assessor/s (once appointed) to arrange the process and logistics for a Witness Assessment to be carried out alongside a scheduled ASI Audit.
- A ‘Witness Assessment Fact Sheet’ will be shared with all parties to provide an overview of the purpose and process.
 - ASI Members will be requested to support the Witness Assessment process as a means to enhance the integrity of the ASI assurance system.
 - While the aim will generally be to provide sufficient notice to all parties on timing, short notice of a proposed Witness Assessment may be necessary in some circumstances. ASI appreciates the co-operation of all parties to schedule a mutually suitable timeframe for a Witness Assessment to be conducted.
 - Confidentiality requirements will be included in the contract between ASI and the Witness Assessor/s. Additional non-disclosure agreements may also be developed among the parties, including any technical experts, translators or other observers.
 - All parties are able to raise concerns to the ASI Secretariat about existing or potential conflicts of interest among the Witness Assessment team, or other factors that may compromise the integrity of a Witness Assessment. These will be duly considered, and reasonable steps taken to mitigate these as appropriate. Where valid concerns are raised, changes to the scope, timing, logistics or participants may be considered.

5.4. Stage 3 – Conduct of Witness Assessments

12. To prepare for the Witness Assessment, the Witness Assessor/s may request access to the following background information:
- ASI Accredited Auditing Firm: the audit plan for the ASI Audit to be witnessed; internal procedures for ASI Audits; any associated internal or external reviews; previous witness assessments; information about the competencies and experience of ASI Accredited Auditors.
 - ASI Member: general information about the site/s to be visited, PPE requirements, site induction plans.
 - ASI Secretariat: access to publicly available information on the ASI Certification program, such as ASI Standards documentation, previous ASI Certifications for the ASI Member/ASI Accredited Auditing Firm etc.

13. The ASI Secretariat may also provide the Witness Assessor/s access to *elementAI*, ASI's online assurance platform, via a secure dashboard for, and during the period of, the Witness Assessment:
 - To preview the ASI Member's Self Assessment, where permission is granted by the ASI Member.
 - Following completion of the ASI Audit, to review the ASI Accredited Auditing Firm's ASI Audit Report, once permission is granted by the ASI Accredited Auditing Firm.
14. While on site, the following activities would normally be carried out by the Witness Assessor/s:
 - Organise a pre-meeting and introductions between the Witness Assessment team and the ASI Accredited Auditors.
 - Request time to explain the purpose and process of the Witness Assessment to the ASI Member during the opening meeting for the ASI Audit.
 - Maintain an objective 'witness' role in the ASI Audit process, which means that Witness Assessor/s or any other Witness Assessment team members should not lead, direct, evaluate findings, assign conformance ratings, or in any other way actively intervene in or interfere with the conduct of the ASI Audit by the ASI Accredited Auditors.
 - In instances where a significant problem of omission or commission is deemed to be occurring, the Witness Assessor may discuss options with ASI for appropriate intervention.
 - Gather relevant objective evidence through observation, review of documentation and discussion:
 - When an appropriate opportunity arises, request information from the ASI Accredited Auditors to clarify or confirm understanding of their activities and support the objectives of the Witness Assessment.
 - If appropriate to the scope of the Witness Assessment, request information or feedback from other stakeholders to the ASI Audit.
 - Record relevant information that will be used to prepare a Witness Assessment Report. This may include identifying any minor lapses of processes and procedures, or any major issues such as misconduct, systemic breaches of processes and procedures, or lack of competence or impartiality during the conduct of the ASI Audit.
 - Observe the closing meeting for the ASI Audit with the ASI Member.
 - Organise a separate closing meeting with the ASI Accredited Auditors to discuss any final matters and share any initial findings or observations from the Witness Assessment. While the Witness Assessment Report will contain the final findings, effort should be made to share any significant concerns during this closing meeting.
15. Following conclusion of the on-site ASI Audit activities, the Witness Assessor/s will review the ASI Audit Report, once submitted through *elementAI* by the ASI Accredited Auditing Firm to the ASI Secretariat for the Oversight Assessment, to inform the preparation of the Witness Assessment Report.
16. If a member of the ASI Secretariat is involved in a Witness Assessment, they cannot also carry out the ASI Oversight Assessment for the ASI Audit Report associated with that Witness Assessment.

5.5. Stage 4 – Witness Assessment Reporting

17. The Witness Assessor/s shall prepare a Witness Assessment Report for submission to the ASI Secretariat and the ASI Accredited Auditing Firm.

- This should normally be prepared within 2 weeks of review of the ASI Audit Report related to the Witness Assessment.
18. This Witness Assessment Report shall summarise:
- What was assessed: ASI Accredited Auditing Firm and individual auditors, and ASI Audit details (ASI Standard, ASI Member, ASI Audit type, Supply Chain Activities).
 - How it was assessed: Objectives, assessment plan, activities, participants in the Witness Assessment.
 - Findings: any major issues, minor lapses, noteworthy achievements or general comments. Areas of concern should consider the actual or potential impact to the integrity of the ASI assurance system.
 - Recommendations: where relevant, include recommendations for further investigation, follow-up or actions by the ASI Accredited Auditing Firm and/or ASI Secretariat, or improvement opportunities that can be considered.
 - Conflicts or limitations: Any unresolved conflicts, disputes or disagreements encountered during the Witness Assessment, or any limitations that affected the ability to complete it as planned.
19. The ASI Secretariat will acknowledge receipt of the Witness Assessment Report and allow 2 weeks for comment or clarification from the ASI Accredited Auditing Firm.
20. Once this period has concluded, plus any additional correspondence time necessary to support accuracy and validation, the Witness Assessment Report will be considered final by the ASI Secretariat.

5.6. Stage 5 – Outcomes and Actions

21. Where the Witness Assessment Report identifies any major issues or minor lapses as part of its findings, the ASI Accredited Auditing Firm must establish a corrective action plan to address these and prevent a recurrence.
- The plan must be submitted to the ASI Secretariat within 2 weeks of the finalisation of the Witness Assessment Report.
 - Timelines to address all findings must be within 6 months.
 - Confirmation of the closure of the actions must be submitted to the ASI Secretariat at the conclusion of the 2 month period.
22. Recommendations to the ASI Secretariat and/or ASI Accredited Auditing Firm will be duly considered in the context of the above, as will other actions that may be determined to be relevant. Actions that the ASI Secretariat may undertake include:
- Improvements to ASI training
 - Improvements to other ASI processes
 - Follow-up investigations, including additional Witness Assessments
 - Review of ASI Accreditation or Certification decisions
 - Processes in accordance with the ASI Complaints Mechanism.
23. The ASI Secretariat reserves the right to apply appropriate sanctions as a result of the Witness Assessment Report or follow up activities. ASI Accreditation of the ASI Accredited Auditing Firm and/or Accredited Auditor/s may be suspended or revoked if:
- There is evidence of serious misconduct
 - The corrective actions are not satisfactorily completed

- There is evidence of actual or potential impact on the credibility or integrity of the ASI assurance system.

24. Appeals and objections by any party may be submitted in accordance with the ASI Complaints Mechanism.

25. Witness Assessments form part of the ASI Oversight Mechanism, and will thus be further inputs to:

- ASI’s Management Review processes
- ASI’s Monitoring and Evaluation program
- ASI’s Standards Revision processes.

5.7. Roles and Responsibilities – ASI Secretariat

26. The table below sets out key roles and responsibilities within the ASI Secretariat for Witness Assessments:

Role	Responsibilities
Director of Assurance	<ul style="list-style-type: none"> • Overall management of ASI Witness Assessment processes. • Identifying and actioning opportunities to improve ASI’s systems.
elementAI Manager	<ul style="list-style-type: none"> • Liaising with ASI Accredited Auditing Firms and ASI Members to support Witness Assessment planning. • Actioning identified improvement opportunities through <i>elementAI</i> as appropriate.
Learning Manager	<ul style="list-style-type: none"> • Co-ordinating relevant training for Witness Assessors. • Actioning identified improvement opportunities through <i>educationAI</i> as appropriate.
CEO	<ul style="list-style-type: none"> • Approving new or updated procedures. • Approving the appointment of ASI Witness Assessors. • Providing appropriate resources for Witness Assessments to be carried out efficiently and effectively. • Reporting any material issues or significant improvement opportunities to the Board.

6. RECORDS

27. Records of Witness Assessments and supporting information will be securely maintained by the ASI Secretariat for at least 10 years from the date the records were generated.

7. DOCUMENT CONTROL

Document Name	ASI Witness Assessments Procedure
Document ID	ASI-PRO-12
Revision	Version 1
Publication Date	June 2020
Approved By	CEO
Next Review Date	3 years or as required

Please refer to the *ASI Box Folder > Assurance Model > Oversight > Witness Assessments* for the latest version of this procedure.