

ASI Auditor Competence and Assessment Procedure

Version 1 – 18 September 2018

1. PURPOSE

This procedure describes the requirements set by ASI, and the associated processes carried out by the ASI Secretariat, to ensure competent implementation of the ASI assurance system by Accredited Auditor personnel.

2. SCOPE AND APPLICATION

This procedure applies to the ASI Secretariat and ASI Accredited Auditors. It aims to ensure that:

- ASI's auditor personnel competency requirements are clear
- Processes to build competence are relevant and appropriate
- Competency evaluation processes address both the desired learning outcomes and key risks
- Issues with auditor competence identified through oversight processes are addressed
- Processes for auditor calibration are timely and effective

The procedure is designed and operated to align with the principles in the <u>ISEAL Code of Good Practice for</u> <u>Assuring Compliance with Social and Environmental Standards.</u> Relevant clauses in the Code include:

- 5.4.6 regarding setting auditor personnel competence requirements
- 5.5.1 regarding personnel competencies
- 5.5.2 regarding building competence
- 5.5.3 regarding auditor calibration
- 5.5.4 regarding evaluation of competency

3. **DEFINITIONS**

Term	Definition
Accreditation Body	Organisations that accredit Conformity Assessment Bodies to ISO/IEC 17021, and/or ISO/IEC 17065 and/or other technical equivalent standard accreditation for conducting certification audits. Accreditation activities are conducted in accordance with ISO/IEC 17011.
ASI Accreditation	Recognition by ASI of a CAB's competence to carry out audits and evaluate conformance against an ASI Standard.
ASI Accredited Auditor	A Conformity Assessment Body and its Individual Auditors (employees and contractors) accredited by ASI to conduct ASI Certification Audits.
ASI Standards	ASI Performance Standard and ASI Chain of Custody Standard.
Audit	Assessment carried out by an independent third party ASI Accredited Auditor for the purposes of confirming conformance of an ASI Member with the ASI Standard/s. Audit types include Certification Audits, Surveillance Audits and Re-Certification Audits.
Audit Report	Report on the Audit generated by the Auditor and submitted to the Member and to ASI via the ASI Assurance Platform, <i>elementAl</i> . Note in cases where <i>elementAl</i> is unavailable, separate documents can be provided but these



Term	Definition
	must meet the requirements outlined in sections 8.16, 8.17 and 8.18 of the Assurance Manual.
Board	ASI Board as defined in the ASI Constitution.
Certification	An attestation issued by ASI, based on the results of a Certification Audit by an ASI Accredited Auditor, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.
Certification Audit	 A Certification Audit comprises the following: A preliminary desktop review of a Member's Self Assessment and other related information; Development of an Audit Plan to identify the relevant Facilities and Business Activities to visit and assess; Verification of conformance through implementing the Audit Plan; Preparation of an Audit Report for the Member and ASI.
Certification Scope	 The Certification Scope is defined by the Member and sets out what parts of a business, Facilities and/or Business Activities are covered by an ASI Certification. There are three possible approaches to Certification Scope: Business Level: covers a whole Member company, a subsidiary of a Member or a business unit of a Member. Facility Level: covers a single Facility or group of Facilities which are a subset of a Member's total operations. Program Level: covers a single identifiable Program or group of Programs.
Conformity Assessment Body (CAB)	Independent third party organisations accredited to carry out Certification Audits.
Individual Auditor	 Auditors attributed to a CAB (as employees or contractors) accredited to conduct ASI Certification Audits with defined: Geographic Scope Aluminium Supply Chain Sectors Discipline Knowledge in specific fields pertaining to the aluminium supply chain Lead Auditor status.
Member	 An entity or group of entities that is a current member of one of ASI's six membership classes: Production and Transformation (eligible for ASI Certification) Industrial Users (eligible for ASI Certification) Civil Society Downstream Supporters Associations General Supporters
Oversight (ASI Oversight)	Assessment of a CAB's and its auditor's demonstration of competence to carry out certification audits. Note: <i>ASI Oversight</i> is the assessment of ASI Accredited Auditors demonstration of competence to carry out ASI Certification Audits by meeting the relevant mandatory requirements specified in <i>Schedule 2 ASI</i> <i>Accreditation Requirements for Conformity Assessment Bodies</i> and <i>Schedule</i>



Definition

3 Competency Requirements for Auditors Conducting ASI Audits, as it applies to the awarded ASI Accreditation Scope.

4. **REFERENCES**

Term

- ASI Assurance Manual
- ASI Auditor Accreditation Procedure
- ASI Oversight Mechanism
- ASI Monitoring & Evaluation Plan
- ASI Complaints Mechanism
- ASI Certification Audit Report Oversight Assessment Procedure
- ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards
- ISO 19011:2011 Guidelines for auditing management systems

5. PROCEDURE

5.1. Process Overview

1. The core components of the ASI Auditor Competence and Assessment procedure are illustrated in Figure 1 below.



Figure 1 – Core components of ensuring competent implementation of the ASI assurance model



5.2. Roles and Responsibilities

5.2.1. Director of Standards and Assurance

- 2. The ASI Director of Standards and Assurance (or a delegate appointed by the CEO) is responsible for:
 - Setting competence requirements of auditors in the ASI Auditor Accreditation Procedure
 - Implementing the ASI Oversight Mechanism, which includes oversight of competence of auditors
 - Contributing to the other components in Figure 1 as required.

5.2.2. Director of Learning

- 3. The ASI Director of Learning (or a delegate appointed by the CEO) is responsible for:
 - Developing approaches and material for **building competence** of auditors
 - Developing approaches and material to **evaluating competence** of auditors
 - Developing and reviewing calibration processes and supporting material
 - Contributing to the other components in Figure 1 as required.

5.2.3.CEO

- 4. The ASI CEO (or a delegate appointed by the CEO) is responsible for:
 - Reporting any material issues or significant improvement opportunities to the Board
 - Contributing to all the components in Figure 1 as required.

5.2.4. Administration Manager

- 5. The ASI Administration Manager (or a delegate appointed by the CEO) is responsible for:
 - Supporting the administrative processes associated with this procedure
 - Supporting the maintenance of ASI records associated with this procedure
 - Other related duties as required.

5.3. Competence requirements

- 6. The ASI Auditor Accreditation Procedure includes the minimum competency requirements for ASI Individual Auditors and support personnel. The Procedure shall be published on the ASI website.
- 7. The competency requirements shall be designed to ensure that Individual Auditors:
 - Are suitably qualified
 - Are required to be ASI Accredited and trained
 - Have knowledge of practices, processes and risks typical of the Member's business
 - Perform in accordance with the following principles as identified by ISO 19011:
 - 1. Integrity: the foundation of professionalism.
 - 2. Fair presentation: the obligation to report truthfully and accurately.
 - 3. Due professional care: the application of diligence and judgement in Audits.
 - 4. Confidentiality: security of information
 - 5. Independence: the basis for the impartiality of the Audit and objectivity of its conclusions.
 - 6. Evidence based approach: the rational method for reaching reliable and reproducible conclusions through a systematic process.
- 8. Fluency in English (written, spoken, comprehension) is a competency requirement because ASI's official language is English. Fluency in other languages is strongly encouraged, to reflect the global nature of the aluminium value chain.

9. The ASI Secretariat shall at the time of application, and on an annual basis, confirm information about Individual Auditors with the ASI Accredited Auditor, and seek verifiable evidence that the Individual Auditor continues to meet the minimum competency requirements specified in the ASI Auditor Accreditation Procedure and this Procedure.

5.4. Building competence

- 10. It is not expected or necessary that each Auditor has the same competencies, experience and skill set. Certification Assessment Bodies (CABs) shall assemble Audit Teams as appropriate to ensure that the overall competence, experience and skill set is sufficient to achieve the audit objectives.
- 11. To build the necessary competence, all ASI Accredited Auditors shall be required to undergo mandatory initial and refresher training offered by ASI that covers an overview of (but not limited to):
 - ASI Standards and their intent
 - Critical components of the ASI Assurance Model
 - Risks and sector specific issues, including critical sustainability issues, for the aluminium supply chain.
- 12. Initial training must be complete prior to an Auditor participating in an ASI audit.
- 13. A completion date for ongoing training will be specified.
- 14. Auditor training shall address the following minimum learning objectives:
 - Understanding the roles and expectations of ASI Accredited Auditors
 - Understanding the goals and applying the principles of the ASI Certification program
 - Understanding the ASI guidance, tools and resources available to support this process
- 15. To ensure the integrity of the training content and approach, ASI shall be responsible for overall training development and delivery.
 - ASI auditor training shall form part of ASI's broader educationAl program structure.
 - ASI Secretariat shall schedule an appropriate number of in-person auditor training sessions in a range of locations each year, taking into account demand, regional needs, available ASI resources and opportunities to align with other events.
 - In-person training shall include a strong focus on collaborative group exercises, to foster learning through discussion and application. Dialogue and active participation shall be encouraged.
 - Where possible, in-person training shall be located to enable a site visit to a facility that is part of the aluminium value chain, to provide additional learning opportunities.
 - ASI's normative documents and training slides shall be made available to in-person training participants in advance, to support participants' preparation for the sessions. This may include an exercise that should be completed in advance.
 - The ASI Secretariat shall also make on-line training delivery options available for situations where inperson attendance is not possible due to timing or resource constraints. Alternatives to group exercises from the in-person sessions will be considered, where possible.
 - Auditors viewing pre-recorded online training shall be required to formally attest that they have viewed the material, providing times and dates for ASI's records. The Director of Learning shall schedule a follow-up discussion with participant/s to provide the opportunity for reflection on learning, questions and feedback.
 - o Copies of the training slides and normative documents will also be provided.

Aluminium Stewardship



- Where training delivery in languages other than English is appropriate, ASI will adopt a 'train the trainer' approach where possible.
- 16. The ASI Secretariat shall regularly seek feedback from training participants on the training content and experience, to identify opportunities for improvement. The ASI Secretariat shall also identify issues and improvement opportunities that arise through competence evaluations (section 5.5), the Oversight Mechanism, the Complaints Mechanism, the elementAl Help Desk, the Monitoring and Evaluation (M&E) program and other fora, which could be addressed through auditor training.
- 17. The ASI Secretariat will regularly (and at least annually) review and update training modules to enhance relevance and better support the overall learning objectives.
- 18. The ASI Accredited Auditor's support personnel are encouraged to participate in the ASI Auditor training modules but completion of the ASI Auditor training is not mandatory for support personnel.

5.5. Evaluating competence

- 19. Individual Auditors undergoing ASI training modules will need to demonstrate understanding of the learning objectives in each module through formal assessment or by other means as determined by the ASI Secretariat.
 - Assessments will include a written exam that includes both multiple choice and written answer questions, designed to test whether the learning objectives have been achieved.
 - Witness audits described in the ASI Oversight Mechanism will also be used as a means to verify auditor competence.
- 20. A confirmed passing grade of 75% must be achieved on the written exam prior to an Auditor participating in an ASI audit.
- 21. ASI recognises the risks of collaboration or cheating in exam situations. Mitigation measures will include:
 - Requiring photo identification to be presented to confirm the identity of the individual taking the exam.
 - A clear statement of the serious consequences of collaborating or cheating on the exam, included in training slides introducing the exam process and on the front page of the exam paper itself.
 - Regularly changing the content and order of exam questions for any given exam session.
 - Wherever possible, running in-person sessions over more than one day to enable additional time for individual exam preparations and reduce the pressure participants may feel, leading them to think that recourse to collaboration or cheating is needed to pass.
 - For in-person training, having the ASI Secretariat representative performing an invigilation role during the exam process.
 - For on-line training, using an external proctoring service to oversee the exam process. Costs for this service may be charged to Accredited Auditors at the ASI Secretariat's discretion in accordance with the ASI Auditor Accreditation Procedure.
- 22. Where a potential situation of collaboration or cheating on an exam is identified, the ASI Secretariat shall undertake the following steps:
 - Internal review and report
 - External third-party review
 - Discussion with the CAB
 - Decision on applicable sanctions
 - Notification of the ASI Board
 - Implementation of applicable sanctions



- Any other necessary actions
- 23. Applicable sanctions may include one or more of:
 - Stand-down periods before the exam may be re-sat. Costs associated with the re-sit, such as the external proctoring service, will be charged to the Accredited Audit Firm.
 - Stand-down periods before the Individual Auditor/s may carry out ASI Audits
 - Stand-down periods before the Individual Auditor/s may act in the role of a Lead Auditor
 - De-accreditation of the Accredited Auditor CAB
 - Notification of other accreditation organizations

5.6. Calibration processes

- 24. ASI auditor calibration processes shall be developed to ensure consistent understanding and application of the ASI Certification program, including:
 - Requirements in the ASI Standards
 - Processes in the ASI Assurance Manual and the ASI Oversight Mechanism, and sub-ordinate documents.
- 25. Processes for the calibration of ASI Accredited Auditors start with the initial mandatory training described in section 5.4.
- 26. ASI calibration processes also include the need for ASI Accredited Auditors to undergo periodic refresher training offered by ASI that covers an overview of (but not limited to):
 - Reinforcing the competency requirements for ASI Individual Auditors (as per section 5.3 and 5.4)
 - Changes introduced to the training modules in the preceding period
 - Any other relevant issues or improvement opportunities identified by the ASI Secretariat through competence evaluations (section 5.5), Certification Audit Report Oversight Assessments, the Oversight Mechanism, the Complaints Mechanism, the elementAl Help Desk, the Monitoring and Evaluation (M&E) program and other fora.
- 27. Refresher training modules will be conducted at least annually, or more frequently as determined by the ASI Secretariat. Refresher training will address calibration needs, and the frequency will take taking account of particular circumstances such as outcomes form the annual management review (See the Oversight mechanism) or investigations arising from formal complaints (see the Complaints Mechanism), where these circumstances relate to the competence and performance or ASI Accredited Auditors.
- 28. Section 5.5 on Evaluating Competence may also apply to Calibration Processes, particularly in relation to training.
- 29. The implementation of the ASI Certification Audit Report Oversight Assessment Procedure shall also be used to identify and action opportunities for individual auditor calibration on a case by case basis.
- 30. The elementAl platform Help Desk and FAQs in the Auditor Dashboard shall be used to respond to, and make general information available on, calibration matters as appropriate.
- 31. The ASI Secretariat shall prepare and distribute regular newsletters to Accredited Auditors that address calibration needs, including addressing questions and key topics, and advising of upcoming training, oversight and/or calibration activities.
- 32. ASI Accredited Auditor newsletters shall be distributed to Individual Auditors and support personnel who have a current association with an ASI Accredited Audit Firm. For the avoidance of doubt:
 - This includes individuals who have not yet completed applicable training.
 - This includes individuals who do not directly carry out audit activities, but have a managerial, administrative or other role with an ASI Accredited Firm.



- This includes individuals who have been temporarily suspended from carrying out ASI audits.
- This does **not** include individuals who belong to a CAB that has not yet been ASI Accredited, or organisation not related to an ASI Accredited Audit Firm, irrespective of ASI training undertaken.
- Individuals that cease to be associated with an ASI Accredited Audit Firm shall be **removed** from the distribution list.
- 33. ASI Accredited Auditors shall also be required to implement an ongoing programme for the calibration of their auditor and assurance personnel calibration, in accordance with the ASI Auditor Accreditation Procedure.
- 34. Additional processes to ensure the calibration of Individual Auditors may be developed, offered or required by ASI on a needs basis.

5.7. Oversight of competence

- 35. ASI shall continue to oversee the competence of Individual Auditors through the processes set out in the *ASI Oversight Mechanism* and supporting procedures, as well as the Monitoring and Evaluation (M&E Plan). Relevant activities include:
 - Certification Audit Report Oversight Assessments by the ASI Secretariat
 - Evaluations of the effectiveness of training, including refresher training
 - Implementation of the ASI Monitoring and Evaluation (M&E) Plan
 - Annual management review (ASI Oversight Mechanism)
 - Processes of the Independent Accreditation Review Panel
 - Witness audits
 - Processes through the ASI Complaints Mechanism

6. RECORDS

- 36. The ASI Secretariat shall maintain up-to-date records in ASI's Insightly CRM database (and/or elementAl) of ASI Accredited Audit Firms, individual auditors and other assurance and support personnel to track:
 - Accreditation status
 - Training received
 - Eligibility to receive ASI communications
 - Other matters as identified
- 37. Records associated with the Auditor Competence and Assessment processes described in the Procedure will be securely maintained in Insightly, elementAl and Box by the ASI Secretariat for at least 10 years from the date the records were generated.

7. DOCUMENT CONTROL

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Please refer to the ASI Box Folder > Assurance Model > Auditor competence for the latest version of this procedure.