

ASI Assurance – Public System Report

November 2020

Background

This Public System Report is designed to provide a simplified overview of the key aspects of our assurance system to stakeholders. If you have any questions, please contact us at: info@aluminium-stewardship.org.

Assurance System Structure

- ASI's assurance system assesses two Standards: the ASI Performance Standard (V2, 2017) and the ASI Chain of Custody Standard (V1, 2017). The ASI Certification program was launched in December 2017, and as at November 2020 more than 50 ASI Members have one or more certificates issued against the Performance Standard and 22 ASI Members have an ASI Chain of Custody Certification.
- Only ASI Accredited Auditors are eligible to carry out assurance for the purposes of ASI Certification. ASI Accredited Auditors must:
 - Fulfil the nominated and relevant requirements of ISO/IEC 17021 for management system certification schemes, ISO/IEC 17065 for product certification systems or a technical equivalent standard for independent certification auditing recognised in the **ASI Auditor Accreditation Procedure**, or as approved by ASI on a case by case basis.
 - Fulfil the relevant requirements of ISO 19011:2011 as it relates to the skills and experience of the CAB's auditors.
 - A list of ASI Accredited Auditors is maintained on the ASI website [here](#).
- ASI aims to drive quality and ongoing improvements in the assurance system through the mechanisms and workflows set out in the figure from ASI's **Oversight Mechanism** below:



Figure 1 – The 5 main components of the ASI Oversight Mechanism

- The ASI Board oversees assurance system risks at an organisational level in its Risk Assessment and Management Plan, which is reviewed and updated regularly.
- Stakeholders engage in the ASI assurance process via interviews during the audit process, for both certification audits and surveillance audits. The publication of the Public Audit Summary Reports is also a means for feedback from stakeholders about Member certification audits, which can be raised informally directly to the ASI Secretariat or more formally via the **ASI Complaints Mechanism**.
- ASI also engages with stakeholders, including the ASI Indigenous Peoples Advisory Forum (IPAF) as well as civil society organisations in the ASI Standards Committee, to provide input into auditor training on issues such as Indigenous rights and Free Prior and Informed Consent (FPIC), and labour and human rights.

Personnel Competence

- ASI Accredited Auditors are **assessed against published criteria** at both the firm and individual auditor level. Individual auditors are required to meet competence criteria in the areas of:
 - Qualifications (including recognised auditor training that is competency based and delivered by a registered and qualified training organisation for auditor training)
 - Experience (general and auditing)
 - Impartiality
 - Discipline knowledge in the areas of the ASI Standards
 - Sector knowledge
- ASI provides mandatory auditor training about the ASI Standards and assurance model, which includes initial on-boarding modules and ongoing calibration modules. Individual auditors must successfully undertake this training in the required timeframe, which includes a written exam component, before any ASI audits are undertaken.
 - Training modules cover learning objectives for (but not limited to):
 - ASI Standards
 - ASI Assurance Model
 - Risks and sector specific issues for the relevant aluminium supply chain sectors.
 - Individual Auditors undergoing ASI training modules need to demonstrate understanding of the learning objectives in each module through formal assessment.
 - ASI Accredited Auditors are required to notify the ASI Secretariat of any changes to their external accreditation scope, and key findings from periodic audits conducted by the CAB's Accreditation Body/ies.
- Support personnel in ASI Accredited Audit Firms are also encouraged to participate in the Auditor training modules.
- Additional oversight activities for Auditor competence include Witness Assessments and Audit Report Oversight, as well as investigations associated with incidents or complaints of about the Audit Firm and/or its Individual Auditors (if required).
- ASI issues a monthly Auditor Update newsletter to advise Auditors of new training materials, updates to elementAI (ASI's online assurance platform), answer emerging questions, and seek input into future training needs.
- ASI Accreditation may be suspended or revoked if the actions by the ASI Accredited Auditor or Firm:
 - Materially affect the integrity of the ASI Assurance Model detailed in the ASI Assurance Manual
 - Show there is proven misconduct, particularly where this contravenes the basic principles identified in ISO 19011 regarding:
 - Integrity and ethical conduct

- Fair presentation
- Due professional care
- Confidentiality
- Independence
- Evidence based approach to audits.

Assessment

- The **ASI Assurance Manual** sets out the certification process and is publicly available.
- In summary, the assurance process consists of:
 - Audits carried out by independent 3rd parties (ASI Accredited Auditors).
 - On-site audits are required for certification audits. In some cases, desktop audits can be conducted for surveillance audits during the Certification Period where the auditor deems this feasible and commensurate with the risk and maturity profile of the certified company. In 2020, a [Covid-19 policy](#) was introduced setting the parameters for remote auditing.
 - The Certification Period is usually for 3 years, though a 1 year Provisional Certification may be awarded in some circumstances with agreed corrective actions. Surveillance audits are usually required every 12 or 18 months through the three-year Certification period, (or within 6 months for a Provisional Certification) though if the auditor determines that risk of future non-conformance is low and maturity of controls are high, surveillance audits may not be required in successive certifications.
- Audits may be carried out by one qualified individual or a team, with one acting as a Lead Auditor. An Audit Team must include people with the skills and competency necessary to cover the objectives of the Audit. The size and composition of the team is determined by the audit firm and will be influenced by a number of factors, including:
 - Audit Scope
 - Availability of qualified auditors within timeframe for Member's audit
 - Geographical location of the Member's Certification Scope
 - Requirement for specialist knowledge, which could include technical experts or Registered Specialists working under the direction of a Lead Auditor
 - Language considerations
 - Cultural considerations (such as country or regional familiarity, religion, gender, Indigenous Peoples etc.).
- Based on their experience, Auditors may also offer recommendations to a Member about how to correct Non-Conformances, or offer Suggested Business Improvements about practices which conform to ASI Standards but could be conducted differently or more efficiently. However it is ultimately the responsibility of the Member to establish and implement Corrective Actions.
 - Recommendations and Suggested Business Improvements are provided by Auditors purely for informative purposes only and must be offered without prejudice. The Member is under no obligation to accept recommendations or Suggested Business Improvements, and their implementation by the Member is not mandatory. Subsequent Audits shall not judge performance based on the degree or lack of implementation of these.
- Auditors determine conformance levels for individual criteria (Conformance, Minor Non-Conformance, Major Non-Conformance, Not Applicable), and then determine overall conformance for Certification, documenting these in an Audit Report to the company and ASI. The overall conformance finding in turn sets the applicable Certification Period, or in the case of some Major Non-Conformances may trigger a Critical Breach process. All Non-Conformances require corrective action.
 - More information is contained in section 6 on Rating Conformance and Developing Corrective Actions.

Oversight

- ASI's Oversight Mechanism has five components, as illustrated on page 1. These are listed with their supporting procedures below:
 - Proxy accreditation of audit firms – via Auditor Accreditation Procedure and supporting application tools
 - Individual accreditation of auditors – via Auditor Accreditation Procedure and Registered Specialists Procedure
 - Competence building and evaluation – via Auditor Competence and Assessment Procedure; Registered Specialist Competence and Assessment Procedure; and the Assurance Manual
 - Audit report oversight assessments – via Audit Report Oversight Assessment Procedure and publication of Summary Audit Reports
 - Internal and external reviews – via Witness Assessments Procedure; Impartiality Reviews Procedure; Management Reviews Procedure; and Independent Evaluations against the ISEAL Code and other reviews.
- On receipt of each Audit Report from an Auditor, the ASI Secretariat undertakes a review process as part of its oversight model before issuing ASI Certification. The [Audit Report Oversight](#) process is managed through elementAI and includes the following seven steps for quality and consistency of ASI assurance:
 - Review the Audit Team
 - Review the Audit Scope
 - Review the Audit Execution
 - Review the Audit Findings
 - Review the Publishable Information
 - Check documentation and records are all in order, and note any system improvement opportunities
 - Approve the release of ASI Certification

Ongoing Scrutiny

- ASI continues to develop and implement its monitoring and evaluation program, which includes insights for improvements in the assurance model.
- Any stakeholder which has a concern or complaint about ASI's program or processes, including fraudulent behaviour on the part of members or auditors, is encouraged to let us know. The [ASI Complaints Mechanism](#) aims to ensure the fair, timely and objective resolution of complaints relating to ASI's standards setting processes, certification program, auditor conduct and ASI policies and procedures. It serves as an important part of the overall ASI governance model, allowing stakeholders to raise issues of concern and have these investigated and addressed as appropriate. The complaints procedure does not replace or limit access to judicial remedies.

Review and Revision process

- The ordinary revision timetable for ASI Standards is 5 years, or earlier as required. The ASI Board agreed to bring forward the next revision cycle by one year and as such the revision for ASI's 2017 Standards, Guidance, Assurance Manual and Claims Guide commenced in 2020 and is scheduled for completion in early 2022.
- We welcome suggestions, feedback and comments on our assurance model at any time from any interested stakeholder, as well as participation in ongoing Working Groups. Please contact us at info@aluminium-stewardship.org.