Remote Assessment Procedures

Purpose

IHCA Certification is committed to safeguarding the integrity of our assessment and third-party quality certification activities.

This document details IHCA Certification's approach to conducting assessments using remote assessment techniques and technology.

Application

This document applies to employees of IHCA Group and assessors contracted to conduct third-party quality activities on behalf of IHCA Certification.

When the need to apply remote assessment techniques arises, IHCA Certification will adopt a risk-based approach that is consistent with the intent of all accreditation and scheme requirements.

IHCA Certification is accredited by JASANZ to IAF MD 4. As such, all use of Information and Communication Technology (ICT) for remote assessment purposes will be in accordance with that mandatory document, ensuring the integrity, confidentiality and security of all assessment records and information.

In unforeseen emergent situations such as natural disasters. options available to client organisations to maintain certification include:

- If mid-cycle, explore the possibility of postponement for no more than three months or conducting the mid-cycle assessment remotely, increasing the on-site duration at the next scheduled assessment if the assessment report indicates this necessary. If the client organisation has been shut down completely for a limited period of time (less than 6 months) the assessment may be postponed until operations have resumed.
- For recertification, if the client organisation has temporarily ceased operations or is otherwise unable to reasonably participate in the assessment, the recertification may be postponed no more than 6 months beyond the original expiry date. If this is not possible, an initial certification assessment process must be performed.
- New clients seeking initial certification may be postponed as necessary, with relevant information provided to the Scheme Owner.
- However, if agreement of all relevant parties (client organisation, scheme owner, assessor, technical expert, IHCA Certification) has been reached the initial certification may proceed through the application of remote assessment techniques.

IHCA Certification's risk-based approach

Overview

The following summarises IHCA Certification's approach to planning and completing an assessment that includes the use of remote assessment techniques:

- At initial assessment planning phase, the Assessment Coordinator is to complete the relevant risk rating template (3031 or 5019 for NDIS).
- If remote assessment is being applied, the audit plan is to identify and document the risks and opportunities that may impact audit effectiveness.
- During audit planning, IHCA staff are to document (email to be saved to audit file) their verification of ICT infrastructure with the client organisation and audit team.
- Audit reports are to document the impact of ICT used on audit outcomes.

Initial assessments

In instances where initial assessments cannot be conducted onsite, IHCA Certification may undertake a remote assessment in accordance with IAF MD 4. Remote assessment of the standard must also be in accordance with the position of the scheme and standard owner.

The planning and execution of the assessment is to demonstrate how the remote assessment has safeguarded the integrity and robustness of the assessment outcome.

The assessment is to include (where necessary and appropriate) interviews with staff and service users. Providing all of the relevant scheme and standard requirements have been satisfied, IHCA Certification may issue a certificate or recommendation.

Recertification assessments

Where recertification assessments are to occur using remote assessment techniques, IHCA Certification is to document the planning and execution of the assessment and demonstrate how the remote assessment has safeguarded the integrity and robustness of the assessment outcome.

Surveillance / mid-cycle assessments

On-site surveillance assessments may be replaced by remote assessment techniques.

Verification of corrective actions

- Alternate assessment techniques may be used to certify and close nonconformances, provided the effectiveness of the procedures selected can be ensured.
- Where an open nonconformity cannot be effectively evaluated by remote assessment techniques, IHCA Certification will evaluate the risks to continuing the client's certification and act accordingly. This may lead to escalating the non-conformity to suspension of certification, or extending the time to enable evaluation of the nonconformity (e.g. site assessment when possible).
- Where an open nonconformity is evaluated and it cannot be closed, the normal processes for suspension and withdrawal of certification should be followed.

Responsibilities

- The Assessment Coordinator is responsible for
    - completing the risk rating
    - ensuring that assessment plans detail the ICT to be used in completing the assessment, and liaising with the client to verify the effectiveness and availability of the ICT to be used during the assessment
- Assessors are responsible for undertaking remote assessments in a manner that complies with IAF MD 4 and ensures the integrity of the assessment outcome
- The General Manager Operations is responsible for reviewing risk assessments where necessary and ensuring that all assessment plans and reports comply with the stated requirements

Reporting

All reports of assessments that have been conducted using remote assessment techniques must record the ICT used in the assessment process and how this has safeguarded the integrity of the assessment outcome.

Risk Framework for Remote Assessment

Purpose

It is recognised that remote assessments are not appropriate or possible in every circumstance. Due to the need to use remote assessment techniques to evaluate ongoing compliance of certified clients in certain circumstances, the following is a framework for managing risks associated with use of remote assessment techniques.

Objectives

The objectives for this risk management approach to the use of Remote Assessment Techniques are:

1. To adequately manage the risks in maintaining certification of organisations assessed remotely.
2. To ensure all staff and contractors are aware of this approach and associated processes and understand how this applies to their role.
3. To appropriately assess and analyse the risk associated with the client organisation and determine the level of threat in maintaining certification.
4. To determine or decide on a course of action to address the risk and monitor the implementation of actions to mitigate identified risks.
5. To monitor and review on a regular basis the risk management process.

Criteria

Due to the number of factors impacting the level of risk associated with a remote assessment, two documents have been developed to assess the risk criteria: 3031 and 5019. These documents are used to assess the resultant Risk Ranking which determines the appropriate response to the risk.

Once analysed each assessment will be reviewed to determine whether there is an acceptable level of risk.

Reasons why a risk may be acceptable:
- The level of the risk is so low that specific treatment is not appropriate within available resources.
- The risk is such that there is no treatment available. For example, where conducting an onsite assessment would not address the risk associated with the remote assessment.

Reasons why a risk may be unacceptable:
- Where an assessment conducted remotely threatens the safeguards, integrity and robustness of the assessment outcome.

Unacceptable risks are those which will require treatment.

Risk Treatment

Treating, or managing risks involves identifying and assessing options and determining risk controls. More than one treatment may be determined to manage a risk.

When assessing options for treatment, one of several decision points may be chosen. These include:
- A follow up onsite assessment will be conducted within 12 months of recommendation of certification or ongoing certification.
- Requesting an extension from the Scheme Owner to allow for conduct of the assessment onsite where there is no/reduced level of risk
- A follow up remote assessment may be conducted where Corrective Action Plans are unable to be addressed via this method.

Determining which risk treatment is the most appropriate depends on the circumstances of the individual client.

Where an assessment is not low risk, the General Manager Operations will determine whether the Risk Treatment adequately addresses the risk.

Where the treatment does not adequately address risk, the assessment will be postponed, to be conducted onsite as soon as safely possible. The client and scheme owner should be made aware of potential consequences of this action.

Documentation and monitoring

Where an assessment is undertaken using remote assessment techniques, IHCA Certification documents the planning and execution of the assessment through the assessment plan and the assessment report.

IHCA Certification demonstrates how it has safeguarded the integrity and robustness of the outcome of a remotely conducted assessment. This is documented through a statement from the Assessor on the assessment report.

All assessment reports will contain a statement from the Assessor on the level of risk associated with the remote assessment. This will include:
- A statement on any areas of that were not able to be assessed effectively due to not being on site.
    - Any risks associated with not being able to review these areas
- The level of risk associated with remotely undertaking a remote assessment of the service, taking into consideration the nature of the services (high risk services, and working with highly vulnerable groups), number of clients, number of sites, maturity of quality management systems, and findings of the assessment.

Use of ICT

Use of Information and Communication Technology (ICT) is to be used in accordance with IAF MD 4.

This includes ensuring the integrity, confidentiality and security of all assessment records and information.

In conducting a remote assessment, the same evidence is required as for an onsite assessment. This involves site inspection/s, management, staff and client interviews (as per the Standard Requirements), access to client files (as per the Standard Requirements), policies, and other relevant documents and records.

Remote assessing requires a visual inspection of the site using Microsoft Teams, Skype, Zoom or another video teleconferencing platform. The Assessment Coordinator will ensure this is arranged before the assessment commences, and the choice of ICT will be detailed on the assessment plan. Should a remote assessment not occur due to ICT issues, the Assessment Coordinator responsible for the assessment will need to be advised as soon as possible to enable alternate arrangements to be made.

Assessors are to consider appropriate communication methods with the organisation around providing electronic and paper-based information with a view to ensuring the security and confidentiality of information. IHCA Certification's preference is that documents are viewed through the provision of temporary access to the client's system or through Citrix Sharefile.

Additionally, the ICT practices used to conduct the remote assessment are to be clearly detailed in the assessment report.

Process flow chart