

SCS Code of Practice for the SCS 9001 Certification Process Release 1.0

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Section 1: Introduction

This document is intended for organizations, Certification Bodies and Accreditation Bodies. It contains information designed to improve the contents and consistency of the audit process, including oversight.

Definitions

- **Correction** – action to eliminate a detected nonconformity (ISO 9001)
- **Corrective action** – action to eliminate the cause of a detected nonconformity or other undesirable situation (See ISO 9001 definition)
- **Findings include** –
 1. Major Nonconformity
 2. Minor Nonconformity
 3. Opportunities for Improvement
- **Nonconformity** –
 1. Per ISO/IEC 17021-1 3.11 “Non-fulfillment of a requirement”.
 2. A nonconformity requires a written corrective action which has to be satisfactorily implemented and verified in order for the nonconformity to be closed.
- **Nonconformity, Major** –
 1. Nonconformity that affects the capability of the management system to achieve the intended results. Note: Nonconformities could be classified as major in the following circumstances:
 - If there is a significant doubt that effective process control is in place; or that products or services will meet specified requirements; - a number of minor nonconformities associated with the same requirement or issue could demonstrate a systematic failure and thus constitute a major.*
 2. In addition a major nonconformity can be one or more of the following:
 - a. The absence of, or the failure to implement and maintain, all aspects of one or more requirements for SCS 9001 certification/registration; or
 - b. A minor nonconformity that was previously issued and not addressed effectively.
- **Nonconformity, Minor** – Nonconformity that does not affect the capability of the management system to achieve the intended results.*

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- **Opportunities for Improvement** – Documented statements that may identify areas for potential improvement in the organization’s system, but shall not include specific recommendations nor require action by the organization. Nonconformities shall not be recorded as opportunities for improvement.

Acronyms

AB	Accreditation Body
CAP	Corrective Action Plan
SCS CB	Certification Body
Pre-Audit SCS CB Information Package	Information provided by the Org to the SCS CB prior to its scheduled certification, surveillance or recertification audit.
QMS	Quality Management System

Associated References

- ISO/IEC 27006:2015 IT Security Techniques-Requirements for Bodies Providing Audit and certification of Information Security Systems
- ISO/IEC 17011:2017 Conformity Assessment-Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies
- ISO/IEC 17021-1:2015 Conformity Assessment-Requirements for Bodies Providing Audit and Certification of Management Systems Part 1: Requirements
- SCS Certification Suspension Processes
- Management of Registration Profiles
- SCS 9001 Auditor Time Chart
- Competence and Experience Requirements for SCS 9001 Certification Body Auditors
- SCS 9001 Accreditation Body Implementation Requirements
- SCS Certification Body Quarterly Data Submission

Associated (Optional) Documents:

- ISO 9001 Quality Management Systems – Fundamentals and Vocabulary

Section 2: General SCS CB Requirements

The SCS CB must be accredited by a body recognized by the TIA QF. The SCS CB's scope of accreditation shall cover the activity being registered. Recognized Accreditation Bodies are listed on the 9001 TIA QF website (<http://tl9001.org>).

For each three-year interval, 100% of the entire scope of the organization being registered and all applicable SCS 9001 requirements and measurements shall be audited. The Audit Report shall clearly document the portions of the SCS management system that were audited.

The SCS CB audit team shall provide documented findings at the end of each audit. A written report shall be provided to the organization within 30 days of the conclusion of each audit, or within 30 days of the conclusion of a multi-site audit. The report will include the documented findings, overall audit conclusions, significant audit trails and recommendations.

SCS CBs, or bodies related to a SCS CB, that have provided management system consulting services and/or paid private training to a particular client may not conduct certification services for that client, nor may they supply auditors for a period of two years after the services were provided.

Auditors who fulfill the requirements of the Qualification and Experience Requirements for SCS 9001 Certification Body Auditors must perform the audit of any portion of an organization within the SCS 9001 scope.

The review of the audit report package (Ref. ISO/IEC 17021-1:2015 Section 9.5.2) and confirmation of the assessment team's recommendation for certification shall be performed by a qualified SCS 9001 Lead Auditor who was not a member of the assessment team. The final certification decision shall be made by the SCS CB organization. The SCS 9001 Lead Auditor requirements are defined in SCS *Qualification and Experience Requirements for SCS 9001 Certification Body Auditors*.

Quality management system consultants to the organization, if present during the audit, are limited to the role of observer.

All major nonconformities shall be resolved prior to the issuance of the SCS 9001 certificate. All nonconformities are handled in accordance with the SCS CB's standard operating procedure(s).

SCS CBs are authorized to cite conformance to SCS 9001 on ISO 9001 certificates, when they: a) contract with an organization to follow this Code of Practice, and b) are accredited by a TIA QF-recognized Accreditation Body to issue SCS 9001 certificates.

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The SCS CB must have a process to settle disputes over interpretations of the SCS 9001 standard.

All SCS CBs shall submit quarterly audit data to TIA QF per SCS CB Quarterly Data Submission document. Failure to do so will result in SCS CB suspension as detailed in the SCS CB Quarterly Data Submission document.

Section 3: Classification of Audit Findings and Resolution

Nonconformity Process

SCS CBs shall have a documented process to close major and minor nonconformities identified in a SCS 9001 audit.

The process for closing nonconformities shall include:

1. A Corrective Action Plan (CAP) for each nonconformity shall be received by the SCS CB within 30 days following the Organization's receipt of the audit report. This CAP shall include containment/correction, root cause analysis, and an implementation due date. SCS CBs are required to respond to the proposed CAP in a timely manner. Resolution by the organization of a major nonconformity requires acceptable evidence of implementation of the CAP within the SCS CB's specified timeframe, not to exceed 90 days from the Organization's receipt of the audit report. Resolution by the organization of a minor nonconformity requires acceptable evidence of implementation of the CAP no later than the next scheduled audit. Exceptions to these resolution timeframes shall be approved by the SCS CB, fully justified by the organization and documented. A follow-up within the 90-day timeframe will be required for major nonconformities to verify effective implementation of the corrective action unless otherwise justified and documented.
2. A SCS 9001 certification shall not be issued until: (a) all major nonconformities are fully resolved; and (b) minor nonconformities are fully resolved or corrective action plans are defined consistent with the above timing requirements.
3. A certified organization shall not receive re-certification if there are overdue minor nonconformities from the previous audit or any unresolved major nonconformities at the time the certificate expires. Failure to meet the deadline for closing a major nonconformity after a surveillance audit shall lead to the withdrawal of the SCS 9001 certificate. The certificate may be reinstated on resolution of the nonconformity.

SCS CBs shall have a documented process to ensure that findings raised during audits are being recorded in accordance with the findings definition listed in Section 1. This process shall include an evaluation of the quantity and type of audit findings raised: majors, minors, and opportunities for improvements. The process shall include investigation and, where necessary, performance improvement of individual auditors who consistently misclassify audit findings.

Examples of Major and Minor Nonconformities:

Major Nonconformities:

- The omission of all aspects of a specific requirement of the SCS 9001 Requirements Handbook.
- Systemic failure of the organization to implement and maintain effective internal audit and management review processes.
- Failure to achieve the intent of a SCS requirement or control.
- Failure to follow legal/statutory requirements applicable to the product or service.
- Multiple minor non-conformities within the same element of the standard, process, or part of the system which when combined represent a breakdown of the organization's systems.
- Where judgment and experience can reasonably demonstrate the likelihood of breaches of confidentiality, integrity, and availability of information and assets resulting from the inability to effectively implement SCS 9001 requirements, controls, or processes.
- Failure to correct minor nonconformities previously raised by the SCS CB unless evidence is in place showing progress and tracking to an established implementation due date.

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–If SCS 9001 Annex B Measurements are used, repeated submission of data inconsistent with the counting rules in the SCS Measurements or conscious lack of resubmitting previous data when it is known to be inaccurate.

Minor Nonconformities:

- An observed lapse in following a process, procedure, or the management system where judgment and experience can demonstrate there is minimal risk to the product and/or service being supplied.
- Any failure of the audited system to satisfy the effective implementation of a requirement of the SCS 9001 Requirements and if optional Measurements are used that is not considered to be a major nonconformity.

Section 4: Consistent Audit Approach Definition & Criteria for SCS CB & Organization

There are three areas requiring consistency by the SCS CB and Organization. Each section below describes the requirements.

Pre-Audit Information

The SCS CB is required to obtain the following information and data from the Organization a minimum of six weeks (or within an agreed timeframe) prior to scheduled audit:

1. List number of Core and Support people within the registration scope.
2. Advise whether the organization is reporting the Annex B Measurements.
3. Any requirement exclusion/s with justification of the exclusion/s.
4. The SCS 9001 CB is required to confirm the exclusion/s per SCS 9001 Section 4.3.3 *Declaration of requirement applicability* to ensure they do not violate SCS 9001 Section 4.3.1 *Determine the scope of the supply chain security management system* requirements. (Also see SCS 9001 Section 1.10 *Applicability*).
4. List processes (for example, support processes, development, technical assistance center, manufacturing, training, or repair) and applicable requirement elements executed within the scope of registration. For multi-site organizations, list the processes executed at the site. Note: An example applicability matrix is available on the TIA SCS [website](#).
5. List all major outsourced entities.
6. Provide information on significant organizational changes, acquisitions, outsourcing or significant changes that have occurred since the last audit or registration contract approval.
7. The organization may re-use the last Pre-Audit SCS CB Information Package, but shall clearly highlight what has changed.

The SCS CB is required to undertake the following Pre-Audit Requirements:

1. Obtain the required Pre-Audit SCS CB Information Package within required timeframe.
2. Use the Pre-Audit SCS CB Information Package provided by the Organization in planning the subsequent audit.
3. Pre-Audit SCS CB Information Package is a required record.

NOTE: Organizations who plan their surveillance and recertification audits close to the surveillance and recertification audit deadline are at risk of having their certificates suspended if Pre-Audit SCS CB information package requirements are not met. It is recommended that surveillance and recertification audits be planned well in advance of deadlines.

Audit Requirements

The SCS CB is required to:

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1. Comply with most current version of ISO/IEC 17021-1 Conformity Assessment-Requirements for Bodies for Providing Audit and Certification of Management Systems and applicable IAF Mandatory Documents.
2. Confirm Pre-Audit SCS CB information Package data is still current.
3. Review effectiveness of the corrective action system processes to include sampling of corrective actions that are overdue and corrective actions not considered overdue but are still open after nine months.
4. When reviewing documentation requirements ensure that current practice is reflected in the documented procedure and aligns with the applicable SCS 9001 release.
5. Review a sampling of customer SCS 9001 audit findings and customer satisfaction results since the last SCS CB audit.
6. Follow-up on progress of any relevant formal complaints registered with the SCS CB against the organization.
7. Review root cause of security incidents to identify processes for additional focus within the audit.
8. If optional SCS Measurements are reported to RMS, a process audit approach for SCS 9001 Measurements to include collection, validation, and submittal in accordance with Section 6 below would be used.
9. For those processes audited, the process review shall include an assessment of the effectiveness of that process.

Post-Audit Requirements

SCS CB is required to monitor audit reports to ensure conformance with ISO/IEC 17021-1 auditing requirements and include evidence that items in the SCS Code of Practice are addressed and documented in the audit report even if the item is not applicable.

Section 5: AB Oversight Requirements

AB is required, during any SCS 9001 SCS CB oversight audit, to verify that this Code of Practice for SCS 9001 Certification Process is followed.

ABs are required to verify compliance to the listed documents in the **Associated References** section of the Code of Practice for SCS 9001 Certification Process.

For SCS CB withdrawals or suspensions, the AB shall make the required changes to the RMS.

Section 6: Responsibilities for Measurement Audits if reported to RMS

If the optional Measurements are reported by the organization, during the audit each SCS CB has responsibility to verify that all measurement processes are in place and effective to ensure the validity of SCS 9001 measurements, including definitions and requirements. The information below can be used to help clarify the expectations of the SCS CB Auditor. This guidance is not intended to identify any additional requirements - only clarifications to those that exist in the SCS 9001 handbook. As these are only clarifications, they are not expected to result in a need for additional audit days.

The following SCS CB auditor responsibilities shall be clearly defined:

1. The SCS CBs shall verify that the organization has a documented system in place that covers:
 - a. Measurements collection and reporting: SCS Measurement Submission History can be verified prior to the audit.
 - b. Measurements validation shall audited to the depth necessary to assure effective implementation of SCS 9001 requirements.
2. Ensure the SCS 9001 measurements are used internally by the organization. This includes reviews by management, strategic objective setting for continual improvement, result/trend

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reviews, and corrective action plans for any performance deviating from the organization’s defined strategic objectives.

3. The SCS CB auditor shall verify that necessary information is being shared by the organization with its suppliers.
4. The SCS CB auditor shall verify that reported measurements to SCS 9001 Administrator [UTD] include a review of the Data Submission Receipts for:
 - a. “Passed” designation
 - b. Any notes or advisories on the Data Submission Receipts and
 - c. Probations
 - d. The Organization’s data submission history since the last audit.
5. If current performance shows an undesirable deviation from the organization’s defined strategic objectives for SCS 9001 measurements, the SCS CB auditor shall verify that corrective action has/is being taken, is documented, and progress is being tracked.
6. SCS CB auditors shall review the actual data submissions, verifying proper implementation of the counting rules for required measurements. This check is to review data consistency covering a minimum one-year period except when the organization has been certified for less than one year in which case the data shall be reviewed for at least as long as the organization has been certified.

For the initial registration audit, pre-certification data submissions require verification.

7. When an Organization upgrades its registration to a new version of the Handbook as part of its Surveillance or Re-certification Audit, at least the most recent quarterly data submission shall use the new version of handbook. SCS CB auditors will verify that all relevant counting rule changes have been properly implemented for the required measurements.
8. While the sample size for the above requirement is left to the SCS CB, it is expected that the depth of assessment for the sampled measurements assures accurate and comprehensive calculation, counting rules, reporting mechanisms, and validation of the measurements. The actual time spent auditing the measurements shall be documented and shall be verified.
9. SCS CB auditors shall confirm that the registration information (for example, scope, , and locations) contained in the Registration Management System (“RMS”) is current and accurate during each assessment.

Section 7: Document Change History

Version	Change	Date	Effective
0.1	Initial Draft Release for Pilots	Sept 17, 2021	TBD
1.0	<ol style="list-style-type: none"> 1. Added new requirements to Section 4 Pre-Audit Information: Any requirement exclusion/s with justification of the exclusion/s. 2. The SCS CB is required to confirm the exclusion/s per SCS 9001 Section 4.3.3 <i>Declaration of requirement applicability</i> to ensure they do not violate SCS 9001 Section 4.3.1 <i>Determine the scope of the supply chain security management system</i> requirements. (Also see SCS 9001 Section 1.10 <i>Applicability</i>). Also minor grammatical and formatting clean-up. Address audit requirements for optional use of SCS measurements. Removed “On-Site” wording for an audit.	November 16, 2023	November 16, 2023