

Response submitted via email
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Dear UKAS Technical and Quality Team,

Please find below our consultation response on the suggested amendments to the usual protocols for accreditation renewal during the Covid-19 pandemic.

Consultation: 'UKAS Policy on Accreditation and Conformity Assessment During the Coronavirus Outbreak'

EAUC – The Alliance for Sustainability Leadership in Education:

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £25 billion, responsible for educating over 2 million students supported by half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

Response to the consultation:

Thank-you for asking for input on this consultation. Our members are predominantly sustainability professionals, and are responsible for the maintenance of various environmental certificates through UKAS. We think it is valiant to provide alternative guidelines that take the current pandemic into account, but we are concerned by several elements.

The approach to this, which is outlined as following on from 'UKAS Technical Policy Statement -TPS 62 - which sets out CB obligations when dealing with extraordinary situations such as pandemics', very much treats the pandemic we are dealing with like an event with a start and finish date. The advice here should be renewed again under a scope of uncertainty. Institutions have skeleton staff on site at the moment, and those carrying out CAB functions are predominantly working from home, or may even be furloughed.

While there are assurances of flexibility in section 3, these are then undermined in other sections. For example, section 4.4 states: "For initial certifications, at least part of the Stage 2 audit shall normally be completed on site, unless the CB can clearly demonstrate to UKAS that all of the objectives and necessary activities can be robustly completed remotely, taking into account specific scheme requirements." In the context of the coronavirus – this is simply not feasible. It is not a choice between being on site, or being able to robustly complete remotely – there will be institutions that cannot do either. So this wording needs more thought. Section 6 is also not in line with the wording in section 4 on remote auditing, it says: "Where the advice restricts or forbids the possibility of undertaking assessments on-site then UKAS shall employ alternative mechanisms to ensure the technical validity of the services it accredits is maintained." This does not mention requirements of demonstrable robustness like section 4 does.

Section 4.5 goes some way in acknowledging we are in unprecedented times, and normal timeframe protocols might not work. But then undermines this by stating: "UKAS policy for this outbreak is that the decision on recertification must be made within 3 months of the lifting of travel restrictions that were preventing the on-site audit taking place. However, if this timeframe exceeds 12 months then the certificate should be suspended, and a new initial audit will be required." For some institutions, the economic implications of the pandemic will have huge ramifications, some might not even come back from it. Requiring recertification within 3 months is not flexible enough, nor is requiring a full new audit if the timeframe exceeds 12 months. We simply do not know how long this pandemic is going to last. That needs to be better reflected here.

Furthermore, the wording of section 6.2 is problematic. It states: "However, if a CAB that is able to accept a remote assessment (in full or part) but refuses to do so within an acceptable timeframe from its usual profile date, then UKAS will need to consider whether a sanction should be imposed." There is no guidance on how a CAB is determined as 'able' to accept a remote assessment, or what grounds for refusal might be. To discuss sanctions at a time like this, requires more detail here, and assurances that this will be determined in a fair and flexible way.

A final point – while we appreciate time is of the essence, giving only 1 week to consult on this change is not enough and fails to sufficiently understand the scale of impact it will have on stretched staff.

Yours sincerely,



Iain Patton, CEO, EAUC