



CERTIFICATION BODY PROTOCOL



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1. Background

Scottish Quality Cereals (SQC) Limited owns the SQC Scheme for Scottish cereal producers which covers the production of crops. The Scheme has a set of documented Standards which are used as product certification standards.

Members of the Scheme are required to prove compliance to the Scheme Standards through a programme of regular surveillance assessments, which may also include additional unannounced spot checks. The assessments are delivered by a third-party Certification Body accredited to ISO 17065, which is licensed by SQC to use the Standards and provide certification.

2. Confidentiality

This Protocol must be kept confidential between the Certification Body and SQC and must not be shared without the express permission of SQC.

3. The Aim of the Protocol

The Protocol is used in conjunction with the Contract between SQC and the Certification Body and is intended to provide clear guidance on the expectation for the operation of the Scheme.

4. Accreditation & Independent Internal Monitoring

The Certification Body is required to achieve and maintain accreditation through the United Kingdom Accreditation Service (UKAS) to ISO 17065 in relation to the certification activities of the Scheme.

In addition to ISO 17065, the Certification Body will adhere to the requirements of ISO 19011 when selecting and appointing the assessment team.

The Certification Body must notify SQC immediately of any information affecting the UKAS accreditation status (i.e. suspension of accreditation).

SQC reserves the right to undertake its own independent monitoring of the Certification Body and its premises and records (such as assessment reports relating directly to the Scheme) in order to satisfy itself that assessment and certification process is being correctly applied. The independent inspection will be agreed between SQC and the appropriate senior manager of the certification body.

SQC will monitor:

- That assessments are carried out consistently in terms of quality
- That assessments are delivered on time and in a professional manner
- That the certification body operates a robust and efficient certification and management process
- The integrity/accuracy of data provided to SQC and that it is provided in a timely manner
- That the certification body provides regular feedback to SQC on any issues experienced with applying the Standards or opportunities for improvement

SQC will undertake specific internal monitoring annually including:

Time spent on audit

Internal monitoring to assess the level of risk of the economic operators

Summary and sample audits reports

As part of the monitoring process Lloyds Register ensure availability of all audit reports to SQC

In the event that relevant information on potential non-conformities has been brought to the attention of SQC by third parties this will be reported to SQC.

SQC also reserves the right for relevant Authorities of Member States to request oversight of relevant processes and information relating to the Scheme, for example but not limited to, The recast RED/Directive (EU) 2018/2001.

5. Certification Body Management Accountabilities

The Certification Body must have a nominated manager with overall accountability for the delivery of the SQC Scheme. This person(s) must be identified to the SQC Executive Officer.

The nominated person will:

- Communicate key and strategic decisions that affect the Contract (i.e. key personnel changes)
- Ensure the requirements of the SQC Scheme are met
- Ensure suitable IT solutions are in place to meet data requirements (i.e. data capture, certification status of the membership etc)
- Attend regular operational meetings providing an update on Scheme performance
- Respond to consultation reviews on Standards (including the collation of reviews from the certification body's appointed technical staff and assessors)
- Receive and respond to SQC management information/key performance indicators (KPI) reports
- Ensure communications from the Scheme Owner are effectively communicated to the relevant staff within the certification body
- Ensure that measures and procedures are in place to prevent bribery and corruption at all levels of its organisation

The Certification Body must have in place senior staff accountable for the day-to-day running/delivery of the Scheme.

Responsibilities will include but not be limited to:

- Technical liaison with the SQC Board and scheme members
- Ensuring assessments are conducted by suitably qualified and trained assessors to ensure consistency and professionalism thus ensuring robust assessments are delivered and the integrity of the Scheme is not compromised
- Ensuring accuracy of data (i.e. certified status of members)
- Provision of regular feedback on the efficacy of Standards and/or opportunities for improvement

- Attending regular meetings with the SQC Board

The Certification Body will employ sufficient resource (see also section 7) to enable it to properly manage the Scheme including providing or having access to suitable Technical Advisory Services.

The Certification Body will provide secretarial services and support in respect of any Technical meetings relating to Scheme Operation.

6. Scheme Documentation & Membership Communications

The Certification Body will, at its' cost, ensure that sufficient quantities of Scheme documentation are provided by hard/or soft copy, as agreed with SQC, to ensure the proper administration of the Scheme.

The Certification Body is responsible for despatching Scheme documentation as soon as reasonably possible following a request thereof.

The Certification Body is responsible for maintaining and developing Scheme Standards under the guidance and control of the SQC Board. SQC will authorise the Certification Body to make any necessary changes to the Scheme Standards as proposed by the SQC Board and approved by the Certification Body Council.

7. Certification Officers, Assessors, Assessment Planners and Administrators

The Certification Body will appoint sufficient competent personnel to carry out the work required. They will ensure all staff employed or sub-contracted to properly manage the Scheme are trained to an appropriate standard.

Employees and personnel subcontracted by the Certification Body to deliver the Scheme requirements must adhere to a Code of Conduct which includes:

- Ensure that actions or activities do not bring the Scheme into disrepute
- Operate in a professional manner to ensure the integrity and robustness of the Scheme is not compromised
- Embrace and promote the concept of farm assurance and its position within the supply chain
- Ensure that activities and public statements do not bring the Scheme or its members into disrepute
- Ensure that employees and assessors do not use the assessment to promote other business opportunities or consultancy work to members
- Ensure that there are no conflicts of interest that could impact on the outcome of an assessment/certification decision

The above Code does not preclude or restrict the Certification Body from promoting its activities to a third party or from seeking clarification from the relevant authorities on issue of concern.



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Issues of concern should be raised privately and without publicity to avoid harming public perception. However, the obligation to provide information to a relevant authority in the course of legal proceedings will not be restricted.

Certification Officer – Role

The role of the Certification Officer (CO) is to independently review completed assessment reports to ensure that the assessor has recorded suitable objective evidence within the report, to support their findings on the member's conformance against the Scheme Standards in order to allow a certification decision to be reached.

Where no non-conformances have been raised and the CO is satisfied with the technical content of the assessment, the CO will grant certification.

Where non-conformances have been raised, the CO will commence an initial evaluation of the completed report and once corrective evidence has been received from the applicant or member, complete the evaluation based upon the evidence received and make a recommendation for certification or suspension as appropriate.

If the corrective evidence submitted is deemed insufficient and the rectification timescale allows, the CO will request further information from the applicant or member and indicate the timescale for submission in order to allow the certification process to continue.

Where the due by date for submission has passed, the CO will evaluate the information that has been received and make a certification recommendation.

A second CO, who has not been involved in the initial evaluation will make the final certification decision.

Certification Officer – Conflict of Interest

CO are required to complete confidentiality and declarations of conflict of interest in relation to any applicants or members with whom they have a commercial interest. Where a conflict of interest has been identified the CO may not participate in any certification decisions relating to the applicant/member.



Certification Officer - Competency

Qualifications/Experience	<ul style="list-style-type: none"> - Degree/HND/SVQ Level 3 or equivalent in an agricultural or related discipline - Two years technical experience in the UK Agriculture sector. Experience at operating an agricultural business is desirable but not essential - Or three years' experience of combinable crop evaluation/certification
Skills: Technical Knowledge	<ul style="list-style-type: none"> - Ability to stay up to date with knowledge of relevant legislation, regulations and Scheme Standards - An understanding and interpretation of Scheme Standards
Conduct/Manner	<ul style="list-style-type: none"> - Professional, including confidentiality - Confident, firm and fair but not confrontational - Confident in use of electronic/information technology equipment
Organisational	<ul style="list-style-type: none"> - Preparation, including relevant documentation and equipment - Ability to meet deadlines
Communication	<ul style="list-style-type: none"> - Interaction with client/team – rapport - Questioning skills – use of open and relevant questions - Listening skills – understanding and interpretation - Clarification of points raised
Verification	<ul style="list-style-type: none"> - Evaluation of assessment reports/ability to verify compliance with Scheme Standards - Understanding and interpretation of written material
Reporting	<ul style="list-style-type: none"> - Reports/decisions – factual, logical, concise and well presented

Assessor - Role

The role of the assessor is to undertake an independent assessment of the applicant/member's site to evaluate and complete an assessment report which records evidence to support their findings of site conformance with the Scheme Standards.



The assessor will be technically competent for the scope of the assessment that they are undertaking.

The assessor is responsible for liaising with the applicant/member to agree a mutually convenient appointment for an assessment.

Following completion of the assessment the assessor will complete a Visit Record/Non-conformance Report which will be signed by both the assessor and the applicant/member. The assessor will explain the certification process to the applicant/member and prior to leaving the site will leave a copy of the Visit Record with the member.

The assessor is required to upload the completed assessment report and a copy of the signed Visit Record to the Certification Body within 2 working days of the assessment.

Assessors – Competency

Qualifications/Experience	<ul style="list-style-type: none"> - Degree/HND/SVQ Level 3 or equivalent in an agricultural or related discipline - Or two years recent experience of general combinable crops production - Or three years' experience of combinable crop evaluation/certification - NPTC Certificate of Competency – PA1 Certificate or suitable equivalent qualification
Skills: Technical Knowledge	<ul style="list-style-type: none"> - Ability to stay up to date with knowledge of relevant legislation, regulations and Scheme Standards - An understanding and interpretation of Scheme Standards
Conduct/Manner	<ul style="list-style-type: none"> - Professional, including confidentiality - Confident, firm and fair but not confrontational - Confident in use of electronic/information technology equipment
Organisational	<ul style="list-style-type: none"> - Preparation, including relevant documentation and equipment - Ability to meet deadlines
Communication	<ul style="list-style-type: none"> - Interaction with client/team – rapport - Questioning skills – use of open and relevant questions - Listening skills – understanding and interpretation - Clarification of points raised
Verification	<ul style="list-style-type: none"> - Ability to verify compliance with Scheme Standards - Understanding and interpretation of written material
Reporting	<ul style="list-style-type: none"> - Reports/decisions – factual, logical, concise and well presented



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Assessor Training

The Certification Body is responsible for the appointment and training of assessors. The training will include an understanding of the ISO 17065 requirements and impact on the work that assessors undertake.

Assessors will be required to attend a minimum of two shadow assessments (where they will attend an assessment being delivered by an approved assessor. Where possible it is recommended that the trainee assessor shadows more than one qualified assessor).

The assessor will be required to conduct a minimum of one assessment which will be witnessed by an approved witness assessor. The Witness Assessor will submit a report relating to the performance of the trainee assessor which will be reviewed and approved by the Crops & Fresh Produce Technical Manager and if deemed the trainee assessor has achieved the required level they will become an approved assessor.

Thereafter assessors will be required to be witnessed assessed in accordance with the Certification Body's Witness Assessment Programme and maintain ongoing compliance.

Assessors are required to submit records of continuing professional development (CPD) at least annually.

All records and evidence in relation to witness assessments, training and CPD must be retained by the Certification Body.

SQC reserves the right to review and have input into the required qualifications, experience and competencies of assessors.

Assessment Planner (Planner) – Role

The Planner is responsible for assigning assessments to approved assessors who have the relevant technical competency, expertise and training to deliver assessments against the Scheme Standards. All SQC assessments are carried out annually as defined in the SQC Scheme Manual.

A list of approved assessors, including evidence of witnessed assessments and regular reviews must be maintained by the Certification Body.

The Planner must also ensure that recorded conflicts of interest are adhered to and not assign assessments to an assessor where a conflict has been registered.

In the interest of integrity and robustness of the assessment process, rotation of assessors must be undertaken.



8. Assessment and Certification Process

The Certification Body will have in place a Quality Management System (including documented Quality Procedures (QP's) in relation to all aspects of the delivery of the Scheme. The QP's will include but not be limited to:

Assessment and Certification Process

- Application
- Renewal
- Assessment
- Assessment reports
- Submission of corrective evidence/closing non-conformances
- Certification decisions
- Spot checks
- Suspension of certificate
- Withdrawal of certificate
- Internal Audits

SQC reserves the right to inspect the QPs during the independent monitoring process.

9. Accuracy of Information

The Certification Body must have procedures in place in relation to material changes notified to them by members of the Scheme.

10. Appeals & Complaints and Information Received or Requested from Third Parties

Appeals

The Certification Body must have documented procedures in place in relation to appeals against certification decisions and complaints that arise in relation to Scheme Memberships.

All appeals and complaints must be recorded, acknowledged and fully investigated by persons independent from the assessor or certifier. The record must be available to SQC upon request.

Complaints – General

A formal complaint (such as a formal expression of dissatisfaction about SQC standards, decisions, contractors or the services of the Certification Body (CB)), can be raised by supplying details of the complaint and evidence supporting it, to the SQC Board using the form on the SQC website <https://www.sqcrops.co.uk/find-sqc/> by letter to SQC c/o Lloyd's Register, 6 Redheughs Rigg, South Gyle, Edinburgh, EH12 9DQ or Telephone 0131 619 2100

SQC as the Scheme Owner allows the Standards to be used by a CB who then has the right and responsibility to make the certification decisions.

Complaints relating to the operation of the SQC certification scheme and decisions undertaken by the CB must be raised with in the first instance with the CB and will be dealt with according to the relevant Complaints Procedure QP7

Complaints from Third Parties

Information supplied by third parties, outside of normal assessment situations that suggest significant breaches of Scheme Rules will be investigated in the first instance by the CB (as per the procedures in QP7). These third-party complaints may include, but are not limited to, information from a trade customer, a competitor etc. The 'complaint' may be in the form of information about a pending or completed prosecution of the business in regard to regulations relevant to the scope of the Scheme.

Complaints Process

- Any complaints, not involving certification, will be investigated upon receipt by the Certification Body on behalf of SQC and upon completion of the investigation the complainant will be notified in writing of the outcome within 7 working days
- Any complaints regarding certification made direct to SQC will be recorded and immediately passed on to the Certification Body.
- The Certification Body will inform the SQC Executive Director of any significant complaints at the initial complaint stage (unless the complaint has come via SQC) and the course of action to be followed at evaluation stage.
- Any potential conflict of interest within SQC or the Certification Body must be declared/identified at the outset and any person(s)/interests associated must not have any involvement in the process.
- The Certification Body must liaise with the SQC Executive Director whenever necessary during the investigation procedure to discuss points of judgement and course of action, which may include increased frequency of surveillance assessments, rectification within a specified time period and certificate suspension/withdrawal etc.
- The Certification Body must consult with SQC before making any final decision at subsequent stages in the procedure.
- Certification could be withdrawn for a defined period irrespective of rectification. If the producer wishes to re-join the Scheme at the end of this period, they must be subject to an initial assessment as a new applicant and will normally be subject to surveillance at a higher than normal frequency for a defined period and/or until a pattern of good conformance is established. The member will pay the costs of extraordinary assessments.
- If action to terminate membership for a breach of the Scheme Rules is considered, then the primary decision making will shift from the CB to the SQC.
- Any decision to terminate will be communicated in the form of a 'minded to' notice that invites the member to indicate (within 14 days) why membership should not be terminated. Any response will be considered SQC and the CB and communicated within 7 days.



- Appeals against the result of a complaint investigation must be received within 14 days of notification of the decision and any response will be considered by the SQC and the CB (if appropriate). The Appeal against this decision will be decided by the Chair of SQC who might consult other Directors, and whose decision will be final and binding.

Records

SQC will log/register any complaints made directly and the action taken and also the CB will maintain a Complaints Register (see QP7). The register relevant to complaints will be made available for internal audit and also to authorised Third Parties through an agreed reporting process.

Information requested from Third Parties

- SQC will respond directly, and in accordance with any specified format and timeline to any requests from Third Parties including competent authorities within the UK/EU and the European Commission for information on the standards and scheme procedures including enquiries relating to sustainability and greenhouse gas emissions saving criteria etc. SQC will also require the CB to allow relevant authorities in Member States to supervise the operation of certification and to ensure relevant data is made available upon request such as audit reports.

Requests for information on the certification status of scheme participants must be directed to the CB.
Email: sqc-ca@lr.org

11. Business Continuity

The Certification Body must have the necessary procedures, systems and infrastructure to maintain the operation of the Scheme at all times.

12. Crisis and Incident Management

The Certification Body must have in place a documented crisis and incident management system.