Implementation and support
6 Implementing and supporting the assurance system

6.1 Assurance functions of the HS Secretariat

The HS Secretariat carries out a number of processes designed to monitor and support the integrity and credibility of HS Assurance System. These are addressed in the following sections, and include but are not limited to:

- Ensuring procedures and implementing processes for Assessor accreditation, licensing, and renewals, and coordinating and delivering workshops and processes to ensure consistency in approaches;
- Managing records throughout all aspects of the Assurance System, including version control and accessibility to appropriate parties;
- Ensuring appropriate steps are followed during the Project Certification process, in line with the Assurance System;
- Ensuring appropriate management of all relevant fees;
- Maintaining public information on certification status via the HS website; and
- Informing and consulting with the HS Governance Committee, and implementing any decisions related to the HS Assurance System;
- Providing training and support.

Further requirements are described in following main sections, specifically: Commercial Arrangements and Data Confidentiality (Section 7); Complaints, Appeals and Disciplinary Proceedings (Section 8); and Monitoring and Evaluation (Section 10).

The HS Secretariat is responsible for having the appropriate resources to competently carry out its functions.

6.2 Assessor accreditation, licensing and renewals

6.2.1 Accreditation process

The Accreditation process is overseen and managed by the HS Secretariat on behalf of the HS Council. Accreditation is subject to completion of a programme of training (Accredited Assessor training) which has been authorised by the HS Council, the issuance of a licence agreement and ongoing compliance with all the terms of that licence, including adherence to the code of ethics and continuous professional development through participation in focal area workshops and in updates to accreditation training.

As there is a strong reliance on Accredited Assessors’ own checks and quality control processes, the HS Secretariat only accredits individuals that:

- Have at least six years of relevant work experience;
- Have appropriate auditing qualification in line with ISO 19011; and
- Completed 40 hours of training in Environmental Management Systems, health and safety or social auditing.

Individuals who meet all eligibility requirements and successfully complete the Accredited Assessor training become Provisionally Accredited Assessors. Provisionally Accredited Assessors are not eligible to conduct Assessments against the HS Standard. For full accreditation, Provisionally Accredited Assessors are required to participate in at least one Assessment and receive a positive appraisal from the Accredited Assessors involved in the Assessments. Once the appraisal is received, the HS Secretariat will update the status of the Assessor and their Licence Agreement. Individual Accredited Assessor performance is monitored over time and any breach to the provisions detailed in the License Agreement may result in a temporary or permanent withdrawal of Accredited Assessor status. Accreditation is valid for 5 years, from the signature of the Licence Agreement.
The three levels of accreditation, including the accreditation process and the requirements to maintain accreditation, are summarised below:

**Provisionally Accredited Assessor (PAA):** An assessor that has passed a recognised training course organised by the HS Council but who has yet to fulfil, in a satisfactory manner, the practical training involved with becoming an Accredited Assessor. A Provisionally Accredited Assessor can make contractual arrangements with a client but needs to work with at least one Accredited Assessor. Their eligibility for full accreditation is subject to participating in at least one Assessment at which a positive appraisal is submitted by the Accredited Assessors involved in the Assessments, through an evaluation form to the HS Secretariat for approval.

**Accredited Assessor (AA):** An assessor that holds a current accreditation for the use of the HS Standard. To maintain the status of a fully Accredited Assessor, the Assessor should conduct one Assessment per year (each annual period from the date of accreditation).

**Accredited Lead Assessor (ALA):** An Accredited Assessor who has demonstrated the requisite skills and experience to conduct Assessments on a range of topics in a range of assessment scenarios. Accredited Lead Assessors make up a reference advisory group to the HS Council for technical queries on Assessments, HS Standard performance requirements and other practical matters. The process for an Accredited Assessor to qualify as an Accredited Lead Assessor includes the following steps:

- The AA has done a minimum of six Assessments, including at least two HSAP or Standard Assessments, in a team led by an ALA.
- The AA applies to the HS Secretariat to be formally mentored and assessed for the ALA accreditation level. The ALA mentoring and assessment of an AA must be done by an ALA who has held ALA accreditation for more than two years, and who has done at least six Assessments (certification, HESG or HSAP) in the lead role.
- The AA does two ALA-training Assessments and to be recommended by the ALA(s) for awarding of the ALA accreditation level. It is possible to have the same ALA for both training assessments, or separate ALAs on each Assessment (in which case the second ALA must recommend the readiness of the AA, but based on discussion with the first ALA).
- The AA is awarded the ALA accreditation level subject to positive appraisal from the existing body of Accredited Lead Assessors, submitted through an evaluation form to the HS Secretariat for approval.

### 6.2.2 Loss of accreditation and renewal process

Accredited Assessor status may be suspended or revoked for the following reasons:

- If action or inaction by the Accredited Assessors materially affects the integrity of HS Certification Scheme as set out in the HS Assurance System
- If there is proven or suspected misconduct, particularly where this contravenes the basic principles of the HS Code of Ethics.
- Lack of continuous professional development with regard to the HS Certification Scheme.

To maintain full accreditation, the Assessor should participate in at least one assessment per year. In cases where there is shortfall of Assessment activity, the HS Secretariat will organise periodic workshops to ensure the continuous professional development of HS Accredited Assessor with regard to the HS Certification Scheme, or devise other mechanisms which will provide assurance that competencies are current.
All complaints against Accredited Assessors are recorded in the HS Complaints and Appeals Mechanism and associated disciplinary proceedings described in Section 8.

Where an Accredited Assessor or Accredited Lead Assessor has lost accreditation and wishes to renew accreditation, the Accredited Assessor or Accredited Lead Assessor must complete one further trainee assessment within 18 months of the loss of accreditation, signed off by mentors as satisfactory. In such instances, the accreditation will be restored to the status prior to loss of the accreditation.

Where the loss of accreditation falls outside the time provisions of the paragraph above, any decision to become re-accredited will be subject to the normal processes for accreditation. Nothing in this clause shall prevent the HS Council from refusing to allow an Accredited Assessor or Accredited Lead Assessor to become re-accredited in circumstances where the loss of accreditation relates to material breach of the agreement or actions contrary to the Code of Ethics that resulted in loss of accreditation.

Exceptions to the above processes can be applied for by the AA or ALA to the HS Governance Committee, and would require any alternative process to be approved by the HS Governance Committee.

6.2.3 Observer audits

Accredited Assessors may be subject to impromptu observer audits and reviews by independent peers assigned by the HS Secretariat as part of its assurance system. In addition, as described in Section 10.4, public review and revision process for the Assurance System takes place at least every five years to ensure that integrity and impartiality of the process is not compromised.

The findings of these reviews may prompt the need for refresher training and/or the implementation of other controls designed to maintain the credibility of HS Certification. In some cases, it may result in sanctions and disciplinary proceedings against Projects or Assessors triggered by actions or omissions that affect the integrity of HS Certification. Sanctions include revoking an Assessor’s Accreditation status or a Project’s Certification, as described in Section 8.

6.2.4 Conflicts of interest

As a third-party certification program, the HS Secretariat does not conduct Assessments; instead, it sets the Assessment procedures that independent Assessors must apply. Although this is regarded as the best way to ensure Assessments are unbiased, it is important to make sure there are no conflicts of interest within the Assessment process.

A conflict of interest arises when a person or entity has separate affiliations or relationships regarding a Project that may consciously or sub-consciously influence knowledge, actions and decisions. Perception of conflict of interest is as important to manage as actual conflict of interest, so that Assessments can carry the utmost credibility. Examples of potential conflicts of interest that may arise with Assessors, and should be avoided, include:

- An Assessor has a monetary relationship (as a contractor or employee) with the Project Proponent or a Company acting as a major contractor, sub-contractor, service provider or supplier to the Project (the Assessor should not be assessing the work of their own Company).
- The Assessor has worked previously on the Project (the Assessor should not be assessing their own work).

In the case where an Accredited Assessor has a potential or actual conflict of interest in participating in an Assessment, the Assessor must inform the Project Proponent, and any other Assessors involved, and the HS Secretariat and Client if they are involved in establishing an Assessment, as soon as they become aware of this conflict of interest, and remove themself from the Assessment. As part of its risk management system, HS Secretariat has in place a conflict of interest and impartiality management procedure that:

- Ensures that HS Accredited Assessors contracted for an Assessment and the HS Council’s Governance Committee making certification decisions complete a declaration stating any potential or existing conflicts of interests including property, financial, work and family ties with project proponent and assessment client. This declaration is updated at least annually and whenever a potential conflict arises.
- When there is a conflict-of-interest risk involving HS Accredited Assessors and Governance Committee members, the respective individuals will not be involved in the related Assessment or Certification decision processes.
- Ensures that Accredited Assessors do not assess the same Project Proponent where they conducted technical assistance activities or having worked or provide any consultancy in the last two years for an operation, one of its subsidiaries or a company of the same parent group.
• Ensures that HS Governance Committee making certificate decisions do not make decisions about the same Project Proponents in which they participated in the assessment or where they conducted technical assistance activities or provide consultancy or having worked in the last two years for a company, one of its subsidiaries or a company of the same parent group.

• Ensures that an Accredited Assessor does not assess the same Assessment Client for more than two consecutive Assessments (excluding Re-Assessments).

• Ensures that the Code of Ethics is applied by Accredited Assessors. The Code of Ethics and HS Charter prohibits Assessors and HS Governance Committee from accepting any money, gift, gratuity, or item of value from the Project Proponent. The Code of Ethics and Charter needs to have measures to be taken in case of bribery or coercion. When bribery or coercion of an Accredited Assessor or a member of the HS Governance Committee is suspected, it is reported to the HS Secretariat and dealt with appropriately.

6.3 Facilitating the project certification process

Assurance activities of the HS Secretariat relating to steps of the Certification process are outlined below.

Step 1: Assessment

• Confirm the competence of the Assessor and validity of the licence against the Accredited Assessor register;

• Ensure the Accredited Assessor is using the appropriate versions and templates.

Step 2: Publication for comments and finalisation of report

• Review the Preliminary Assessment Report and confirm that the Assessment process and findings are consistent with the instructions to Assessors in the Assurance System and Assessor Manuals;

• Ensure publication of the report, and appropriate processes for local communities, in keeping with the processes for submission of public comment;

• Accept the public comment responses and any updates to the Final Assessment Report.

Step 3: Application

• Confirm receipt of the HS Certification Application form submission

• Confirm the methodology used to determine a Certification status for the project.

Step 4: Certification

• Upon confirmation that all process steps have been adhered to, notify the HS Council, through its elected Governance Committee, of the intention to certify the project;

• Document the Certification scope and relevant details about the Project, the date Certification becomes effective and expires, and when re-assessment is due, and the HS Standard (including issue number and/or revision) used as the criteria for the Assessment;

• If no concerns are raised by the Governance Committee upon their consideration of the notification, then issue formal documentation and information to the Project, including a unique Certification number and adherence to the claims policy.

• If concerns are raised, organise responses as guided by the Governance Committee chair (e.g. discussions with the ALA), and issue formal documentation as above once the concerns have been addressed;

• Record the Project’s Certification status on the HS website including the Project’s final Assessment report.

The HS Secretariat may initiate additional assurance activities as indicated are required in any given Certification process based on comments or concerns raised. Discussions with the ALA, observer audits and/or peer reviews are examples of mechanisms that the HS Secretariat can activate as part of the HS Certification process.

6.4 Records management

All HS Certification Scheme documents are dated and given a unique version number. Previous versions of documents are maintained on the HS Secretariat database and can be made available upon request.

The HS Secretariat provides standardised processes and terminology to Project Proponents and Accredited Assessors for carrying out Assessments. These processes and references documents are provided and documented
through the HS website and internal communication platforms for confidential items.

HS Secretariat will maintain records of the following:

- Assessment reports and Certification documents for all projects, including projects that submitted applications and projects with suspended or withdrawn certification.

- Certification decisions.

- Applications for Accredited Assessors, licence agreements, CVs, evaluation forms and supporting information of the competence of assessors.

- Translations of technical and governance documents.

- Complaints and appeals, and any subsequent correction or corrective actions.

- HS Council and Governance Committee meeting minutes and decisions.

Records and documents are maintained for minimum 10 years.

6.5 Public information management

Each HS Certification or Re-Certification has a different Certification number to enable tracking of successive Certification status. The history of all HS Assessments and Certification numbers for each Project is maintained on the HS website.

Key HS governance documents are reviewed periodically and the latest versions are made publicly available on the HS website. They provide additional supporting information to assist with implementing the HS Assurance System to ensure credible and reliable assurance of the HS Certification Scheme. These include:

- HS Council Charter
- HS Chamber Modus Operandi
- HS Standard Terms and Conditions of Use
- HS Accredited Assessor Licence Agreement
- HS Accredited Assessor Code of Ethics

General records and confidential data management are described in Section 6.4 and Section 7, respectively.

6.6 Fees management

Fees are published on the HS website for transparency and accountability. As uptake of the HS Certification Scheme is dependent on the affordability of the Assessment and Certification processes, fees are subject to periodic review to ensure they are up to date with market rates.

The cost of HS Certification to a Project Proponent, and the portions that go to the HS Secretariat as fees, comprise:

- **Assessment cost**: The cost of an Assessment will be greatly influenced by the complexity, size and location of the project. 10% of the Assessment cost (professional fees of Assessors, only, excluding travel and expenses) will be the Assessment Fee attributed to the HS Secretariat for management and administration.

- **Re-Assessment cost**: The exact cost of a Re-Assessment depends on the number and complexity of changes to the project. 10% of the Re-Assessment cost (professional fees of Assessors, only, excluding travel and expenses) will be the Re-Assessment Fee attributed to the HS Secretariat for management and administration.

- **Application cost**: The cost of application, i.e. the Application Fee, is fixed at £2,500 per application.

- **Certification cost**: The cost of certification, i.e. the Certification Fee, is fixed at £7,500 per certification.

- **Re-Certification cost**: The cost of Re-Certification, i.e. the Re-Certification Fee, is fixed at £5,000 per re-certification. The Re-Certification cost does not include the cost of the new Assessment required as part of the Re-Certification process.

6.7 Training and support

The HS Secretariat facilitates web-based delivery of information resources and training to all relevant stakeholders, including Project Proponents and Accredited Assessors. Additional face-to-face information sessions and workshops may also be organised to provide guidance on the HS Certification Scheme.

The HS Secretariat works to develop best practice case studies and other forms of peer support. These may be supported by the HS Council and/or other organisations, and may include workshops, seminars, emailed briefs, technical support and additional online resources.