



GENERAL POLICY AND MEANS FOR THE IMPLEMENTATION OF THE ISO/IEC 17011:2017 REQUIREMENTS ON THE IDENTIFICATION AND MANAGEMENT OF RISKS RELATED TO ITS OPERATION

The only valid versions of the documents of the BELAC management system are those available from the BELAC website (www.belac.be).

English translation for information only.

French and Dutch version remain the authoritative documents.

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HISTORY OF THE DOCUMENT

Revision and date of approval	Reason for revision	Type of revision
0 CC 16.09.2010		
1 CC 12.05.2011	Extension of the concept of related bodies having administrative link with BELAC to all conformity assessment bodies placed under the legal responsibility of the Belgian State. Specific provisions with respect to the accreditation of related bodies.	Point 4.1 Point 4.2
2 CC 16.05.2013	Accreditation of inspection activities of FAPETRO (General Direction Energy)	Point 4.2
3 CC 27.10.2016	Periodic update of the document <ul style="list-style-type: none"> - Incompatible activities - Accreditation by BELAC of conformity assessment bodies operated by the FPS Economy 	Point 4.1 Points 4.2 and 4.3
4 CC 19.04.2018	Regular update of the document Update with respect to the requirements of ISO/IEC 17011:2017	
5 CC 07.11.2019	Update of the content of the document in order to comply with the ISO/IEC 17011:2017 requirements on the identification and management of risks related to the operation of BELAC	Full revision
6 CC 29.06.2020	Regular update of the document	Full revision
7 CC 02.12.2021	Regular update of the document - taking into account EA 2/19	Full revision
8 CC 01.12.2022	Analysis of the impact of taking up the position of Director General of the Directorate General Quality and Safety by the Chairman of the Accreditation Board	Full revision
9 CC 29.09.2023	Update and analysis of impact following change in structure E6 and appointment of a new head of department as manager of BELAC	Full revision but no significant changes were made

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GENERAL POLICY AND MEANS FOR THE IMPLEMENTATION OF THE ISO/IEC 17011:2017 REQUIREMENTS ON THE IDENTIFICATION AND MANAGEMENT OF RISKS RELATED TO ITS OPERATION

1 OBJECTIVES AND NORMATIVE REFERENCES

This document aims to define the general policy and means implemented by BELAC to comply with ISO/IEC 17011:2017 requirements on the identification and management of risks related to its operation. Document EA 2/19 was taken into account for this purpose.

This document refers to and complies with the relevant sections of the legal stipulations that determine the operation of BELAC.

2 RECIPIENTS

- Coordination Commission
- Accreditation Board
- Secretariat

3 INTRODUCTION

The standard ISO/IEC 17011:2017 requires each accreditation body to develop and implement a risk-based approach for all the processes governing its operation.

The standard ISO/IEC 17011:2017 explicitly focuses on the risks that may impact

- the maintenance of the impartiality of the accreditation body at all levels of its operation including its decision-making processes (ISO/IEC 17011:2017 clause 4.4);
- the reliability of the services performed by the accredited bodies, due to a lack of control of the performance and the harmonization of the accreditation processes (ISO/IEC 17011:2017 clauses 9.6 and 9.8);
- the efficiency of the accreditation body organizational processes and of the implemented management system (ISO/IEC 17011:2017 clauses 9.6 and 9.8).

As a consequence, each accreditation body is required :

- a) to identify the sources, the impact and the level of severeness of all potential risks ;
- b) to document and implement appropriate mechanisms in order to eliminate or control the identified risks; these mechanisms shall be approved by the committee/structure responsible to supervise the operation of the accreditation body (i.e. for BELAC, the Co-ordination Commission where all parties with interest in the accreditation are represented) ;
- c) to review at regular intervals whether the results of the risks analysis and the mechanisms set up for their control are still relevant, considering the evolution of the activities and of the operational structure.

The present document covers the points a and b , considering the obligation for the accreditation body

- to ensure the impartiality of its operation (see point 4 of the present document);
- to guarantee the competence of the accredited bodies for all concerned activities through the implementation of appropriate assessment plans and programs (see point 5 of the present document);
- to set into force an efficient management system aiming to continuous improvement (see point 6 of the present document).

The tables under points 4, 5 and 6 present the details of the analysis. Based on the working experience, a level is assigned for each identified risk (major - high - medium - low - not significant) as well as the existence of a potential residual risk.

The present document is reconsidered or updated each time an evolution of BELAC or specific circumstances make it necessary and at least as part of each management

review. Where possible, data aiming to provide objective evidence with respect to the declared level of risk have been added.

4 RESULTS OF THE IDENTIFICATION OF RISKS IN TERMS OF IMPARTIALITY

Government accreditation bodies - including BELAC - present specific risks since they are generally placed under the final responsibility of the State and inserted into a wider administrative structure with its own management requirements and which may also include conformity assessment bodies such as laboratories, inspection or certification bodies and even notified bodies.

Considering the environment in which BELAC is operating and the potential impact on impartiality, the following elements are to be taken into account in the identification of potential risks :

- the provision of services by the larger administrative structure which are incompatible with the accreditation activities (consultancy, conformity assessment activities such as those can be offered by bodies accredited by BELAC);
- the existence of conformity assessment bodies within the larger administrative structure to which BELAC also belongs and whose activities can create conflicts of interest;
- the possibility for BELAC to grant accreditation to related conformity assessment bodies that are part of the larger administrative structure;
- the role of the administration (Federal public Service Economy) in the management of BELAC;
- the external influences on the decision-making mechanisms;
- the nature of the accredited activities;
- pressures of financial type;
- the methods of recruitment and assignment of the BELAC permanent secretariat staff;
- the methods of recruitment and appointment of accreditation assessors and experts;
- the handling of appeals;
- the recourse to sub-contracting or to externalised services;
- discrimination in the handling of applications for accreditation.

Source of risk	Description and impact of the identified risk	Level of risk	Measures aiming to eliminate or minimize the risk	Residual risk	Situation as of 01.04.2023
1. Performance of consultancy activities	This may cover consultancy activities for the benefit of accredited/applicant bodies, performed by BELAC or its external assessors.	Medium	Apart from general training sessions dealing with accreditation and the applicable BELAC requirements and procedures, the BELAC staff and the external assessors commit themselves to refrain from any form of advice or service that might compromise the objectivity of the decision-making process. <i>(References : BELAC 1-01, BELAC 3-05, BELAC 3-08, BELAC 3-11)</i>	Low	
	Conducting a pre-assessment is not considered to be a consultancy activity insofar as the BELAC assessors identify possible shortcomings within the organization, but refrain from any form of advice. The concept of pre-assessment (preliminary visit) is in fact integrated in the standard ISO/IEC 17011 (clause 7.5.1)	Medium	BELAC has documented the obligation for the persons involved in the accreditation process to refrain from any type of consultancy. This is an attention point during the on-site monitoring of assessors (form BELAC 6-207), the review of assessment reports and the decision-making processes. In case the deontological rules are not complied with, the co-operation with the concerned person is stopped. <i>(References BELAC 3-05, BELAC 3-09, BELAC 3-1, BELAC 6-207)</i>	Low	A feedback has been sent to different assessors following request of the Accreditation Board

<p>2. Performance by BELAC of conformity assessment activities, such as those offered by BELAC accredited bodies</p>	<p>This may cover conformity assessment activities and in particular the organization of interlaboratory comparisons</p>	<p>Not significant</p>	<p>BELAC refrains from performing any type of conformity assessment activity and in particular from organizing or contributing to the organization of interlaboratory comparisons in sectors where publicly or privately organized programs of interlaboratory comparisons are available. BELAC may however integrate a specific exercise (measurement audit) in an assessment program. <i>(References: BELAC 1-03, BELAC 2-106)</i></p>	<p>Not significant</p>	<p>No example until now</p>
<p>3. Pressures due to the existence of CAB's with administrative link to BELAC.</p>	<p>Considering that BELAC is placed under the responsibility of the Belgian State and has no specific legal identity, all entities of the Belgian administration have formally to be considered as related bodies especially if they perform conformity assessment activities.</p>	<p>Not significant</p>	<p>The functional separation between the activities and responsibilities of the FPS Economy and the other administrative entities is effective based on the relevant legislation.</p>	<p>Not significant</p>	
	<p>BELAC cooperates with conformity assessment bodies operated by administrations at the federal and regional level. This cooperation may in particular involve the provision of assessors/experts and/or the drafting of interpretative documents in order to facilitate the implementation of accreditation standards in specific sectors. The risk for a conflict of interest with conformity assessment bodies operated by federal or regional</p>	<p>Not significant</p>	<p>The federal and regional competent authorities are represented in the BELAC management committees and BELAC benefits from their particular expertise; however, their representatives do not have any special status and are not able to block a decision. <i>(References: BELAC 0-05, BELAC 3-08, BELAC 3-09)</i></p>	<p>Not significant</p>	<p>No case of pressure by an authority registered until now</p>

	administrations is minimum to non-existent.				
	<p>The following conformity assessment bodies currently operate within the FPS Economy:</p> <ul style="list-style-type: none"> - the Directorate General Economic Inspections and the Directorate General Energy perform inspection activities; - the Directorate General Quality and Safety (to whom BELAC belongs) includes: <ul style="list-style-type: none"> - the National Standards service that performs calibration activities. - several testing and inspection services within the framework of legal metrology and product safety. 	Not significant	<p>BELAC belongs to the Directorate General Quality and Safety and the different Directorates General within the FPS Economy are managed in a completely independent manner.</p> <p>The National Standards service carries out only occasionally calibration services for third parties. These services generate only a limited fraction of the operational budget.</p> <p>No tests or inspections are carried out on request of third parties. The activities concerned fall directly under the responsibility of the regulatory authority within the framework of market surveillance.</p> <p>The conformity assessment activities performed by the services of the Directorate General Quality and Safety do not compete with those performed by accredited bodies and cannot cast any doubt on the impartiality of BELAC.</p>	Not significant	
4. Accreditation of administratively related conformity assessment bodies.	BELAC grants accreditation to conformity assessment bodies depending on federal administrations other than the FPS Economy or depending on regional administrations.	Not significant	The functional separation between the activities and responsibilities of the FPS Economy and the other administrative entities is effective based on the relevant legislation. In case of accreditation, provisions	Not significant	No case of pressure by an authority registered until now

			complementary to those defined by the general accreditation procedure are not necessary.		
	<p>Within FPS Economy, the following activities are accredited by BELAC:</p> <ul style="list-style-type: none"> - the calibration activities of the National Standards service and inspection activities within the framework of market surveillance (Directorate General Quality and Safety; - the inspection activities of FAPETRO (Directorate General Energy). <p>This relation may endanger the impartiality of the decision-making process.</p>	Low	<p>BELAC takes the view that the general provisions for accreditation ensure an impartial and independent decision-making even in case of accreditation of bodies belonging to the FPS Economy.</p> <p>However, in order to reinforce the safeguard mechanisms that are already in place, the following specific provisions have been implemented :</p> <ul style="list-style-type: none"> - recourse to foreign assessors for the evaluation of the technical aspects is preferred; - the members of the Accreditation Board who represent the FPS Economy are not allowed to attend the discussions and deliberations and have no voting right in the case of accreditations of the FPS Economy. <p>Since both the chairman and the vice-chairman of the Accreditation Board belong to the FPS Economy, discussions about these files are led by a member of the Accreditation Board who does not belong to the FPS Economy.</p>	Not significant	<p>Recourse to foreign assessors may be difficult to respect in case of inspection according to Belgian legislation</p> <p>Strictly respected (see file BELAC 425, B-490 and minutes of the Accreditation Board</p>
5. Role of the administration of the Federal public Service Economy in	In accordance with the legal stipulations, the FPS Economy has the final responsibility for the operation of the Belgian	Low	The administration is represented in the BELAC decision-making bodies (Coordination Commission and Accreditation Board) by only a limited	Not significant	

<p>the management of BELAC</p>	<p>Accreditation Body. The legal stipulations guarantee the autonomy of BELAC decisions and the role of the administration of the FPS Economy in the BELAC daily management is limited to the provision of human and material resources.</p>		<p>number of representatives; they do not have any special status and are not able to block a decision. (References : BELAC 0-05, BELAC 1-01) See points 7 and 8 for further details</p>		
<p>6. Possible influence on the decision-making mechanisms.</p> <p>(With regard to the role of the FPS Economy : see under points 5 and 6)</p>	<p>Role of the groups of interest : By groups of interest are meant in particular the regulatory authorities which call upon accredited organisations for agreements and notifications and the accredited bodies themselves.</p>	<p>Low</p>	<p>Representation of the groups of interest : The representation of the groups of interest in the National Council, the Coordination Commission and the Accreditation Board is fixed by Royal Decree. The candidates are required to comply with documented criteria of competence and to commit themselves with rules on impartiality and confidentiality. (References : BELAC 0-05)</p>	<p>Low</p>	
			<p>Decisions on the operation rules of BELAC: The decisions are generally made by consensus or, if necessary, by vote with simple majority. Specific measures are in place to avoid that a group of interest can force a decision unilaterally. (References : BELAC 3-08)</p>	<p>Low</p>	<p>Records available in the minutes of the Coordination Commission for each specific case</p>
			<p>Decision on the accreditation files : The methods of examination of the files and the rules for decision making are identical for all the files and are the subject of detailed records. The members of the Accreditation Board who took part in an assessment as assessor or expert are excluded from</p>	<p>Low</p>	<p>Records available in the minutes of the Accreditation Board for each specific case</p>

			<p>the deliberations and have no voting rights.</p> <p>Members of the Bureau who have a direct personal interest or are associated with a file cannot attend the discussions and the deliberations and have no voting rights.</p> <p><i>(References : BELAC 3-09)</i></p>		
	<p>Sanctions</p> <p>There are numerous activities in the regulated sectors for which accreditation is a mandatory prerequisite. The refusal, the withdrawal or the suspension of an accreditation can thus have particularly detrimental consequences for the accredited body. Giving consideration to such situations could endanger the impartiality of the accreditation decisions</p>	Medium	<p>BELAC is conscious of the damage that a refusal, a withdrawal or a suspension of accreditation can cause to any CAB. These sanctions are thus taken after detailed examination and the body has the possibility of putting forward its arguments. Sanctions always imply a decision by the Accreditation Board. In the case of the regulated sectors, a dialog takes place with the regulatory authority but this one does not have any prerogative at the time of decision making.</p> <p>The current provisions make it possible for BELAC to take the decision to impose sanctions as soon as facts are identified which call in question the compliance with the accreditation requirements.</p> <p><i>(References : BELAC 3-11)</i></p>	Low	No example of pressure having resulted in not deciding for a sanction
7. Nature of accredited activities	BELAC may accept any application for accreditation, even when covering very specific activities with possibly only one candidate to the accreditation and for which the	Low	Even if such applications do not constitute an extension of the scope of application of BELAC in a strict sense, they are the subject of a documented review of feasibility and, if necessary, the opinion of the	Not significant	

	BELAC competence may not be easy to guarantee.		Accreditation Board and/or of the Coordination Commission are required.		
	BELAC accredits bodies with a reference status at Belgian level (primarily in the laboratories sector), which imposes specific provisions to ensure competence and independence during the assessment.	Not significant	So as to ensure competence and guarantee independence during the assessment, it is normally called upon foreign assessors and experts coming from organizations with an equivalent level of competence.	Not significant	This provision is actually implemented
8. Financial pressure	<p>In accordance with the provisions of the law on accreditation, the financing of BELAC rests on:</p> <ul style="list-style-type: none"> - The contribution of the FPS Economy via various articles of its ordinary budget <p>Are covered:</p> <ul style="list-style-type: none"> - the provision of office buildings and equipment, including IT services (via the general budget of the Directorate of Quality and Safety); - the provision of personnel to ensure the daily management of BELAC . <p>A potential limitation of the budget allowed to BELAC may endanger the efficiency and the continuity of activities but without direct impact on the impartiality of its operation.</p>	Medium	<p>The financial provisions governing BELAC are such as to ensure the continuity of the activities without generating profit.</p> <p>The legal provisions on the operation of BELAC allow for, if felt necessary to meet the financial needs, a revision of the accreditation costs in order to reinforce the resources of the Accreditation Fund.</p>	Low	
	<ul style="list-style-type: none"> - The contributions of the accredited bodies. <p>The balance between the income and outcome of the Accreditation Fund does not depend on the number of accredited bodies , which contributes</p>	Low	The assessment costs are fixed by Royal Decree. They are calculated on a case-by-case basis, according to the complexity of the assessment audit to be performed.	Not significant	The results of the Fund is a systematic item of each management review. Equilibrium of the Fund is reached.

	<p>to protect the objectivity of the accreditation decisions.</p> <p>The existence of bodies being accredited for a wide range of conformity assessment activities may represent a risk as they are contributing for a relatively high amount to the BELAC financial resources.</p>		<p>The contributions of the accredited bodies are managed through the Accreditation Fund, which guarantees their exclusive assignment for the profit of the operation of BELAC.</p> <p>The collected amounts automatically cover the remuneration of the members of the assessment teams and the surpluses are used for recruiting contractual personnel to reinforce the BELAC secretariat and to perform various other actions (financing of the international obligations and of the promotion actions).</p> <p>The Coordination Commission and the National Council are responsible for the supervision of the management of the Fund as part of the management review.</p> <p>No individual contribution represents such an amount as to significantly impact the BELAC financial budget.</p>		
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	<p>- The remuneration of the personnel involved in the accreditation process</p> <p>The existence of financial incentives related to the type and volume of activities has to be considered</p>	Low	<p>The provisions for remuneration are fixed by the legal stipulations and do not include any possibility for supplements:</p> <p>The members of the BELAC permanent staff are civil servants and are remunerated according to the relevant legal provisions</p> <p>The assessors and experts are remunerated based on an hourly rate : the duration of each assessment is fixed and validated by the BELAC permanent staff.</p> <p>The function of member of the Accreditation Board or of the Coordination Commission is not remunerated</p>	Not significant	
<p>9. Recruitment and assignment of the BELAC secretariat internal staff</p>	<p>The BELAC secretariat internal staff is composed of :</p> <ul style="list-style-type: none"> - civil servants depending on the FPS Economy and made available to BELAC by the Directorate general Quality and Safety - staff engaged on basis of the Accreditation Fund; they are subject to the same obligations as the civil servants. <p>The independence, impartiality and objectivity but also the competence of the BELAC secretariat internal staff need to be ensured.</p>	Not significant	<p>The following provisions make it possible to guarantee the independence, the impartiality and the objectivity but also the competence of the internal staff of the BELAC secretariat (statutory and contractual):</p> <ul style="list-style-type: none"> - The personnel is held to respect the ethical obligations of the civil servants; - The general procedure of recruiting applicable to the civil servants is complied with in all the cases (definition of a function profile and minimum level of competence, selection exams with classification and appointment according to the order of classification). The 	Not significant	

			<p>specificities of the function profiles are fixed by BELAC according to the needs and BELAC takes an active part in the selection exams. The same criteria are used in the event of transfer to BELAC of a civil servant already appointed in another service of the administration.</p> <ul style="list-style-type: none"> - The direction of BELAC is ensured by a civil servant who has the administrative rank of Head of Department and is appointed by the administration. The function profile is defined at the administrative level and supplemented by specific requirements documented in the management system of BELAC; these elements are taken into account for any appointment. - The direction is responsible for the allocation of the tasks and responsibilities between the various BELAC staff members; annual performance objectives are laid down for each collaborator. 		
10. Recruitment and appointment of assessors and experts	The existence of conflicts of interest in case of recruitment and appointment of assessors and experts needs to be considered.	Medium	The BELAC secretariat has the full responsibility for the selection, training (initial and continued), and the formal qualification of the assessors and experts.	Low	

			<p>The BELAC secretariat is sole responsible for the assignment of assessment teams.</p> <p>Several measures are in place to ensure the impartiality:</p> <ul style="list-style-type: none"> - documentation of the general ethical obligations for assessors and experts ; - the possibility of challenge of any assignment by the body to be evaluated; - assessors and experts are required to fill in a written commitment - each assessor or expert is reminded of the obligation to declare any conflict of interest; - regular change of the members of an assessment team in order to avoid undesirable familiarity relation. <p>On its own initiative, BELAC may call for expertise by the regulatory authorities but keeps the final responsibility for the selection of assessors and experts. (References : BELAC 3-05, BELAC 3-11)</p>		
11. Handling of appeals	The handling of appeals must ensure independence from the decision-making process which motivates the lodging of the appeal	Low	<p>A Board of Appeal independent of the decision-making process is responsible for the handling of appeals.</p> <p>The provisions for the operation of the Board of Appeals (composition,</p>	Low	<p>Lodged appeals have been handled according to the procedure.</p> <p>The criteria for the selection of the</p>

			competence and impartiality criteria for the members, timing ...) have been defined as to ensure a full separation with the decision-making process which motivates the lodging of the appeal and an impartial handling of the files. (References : BELAC 0-05, BELAC 3-04)		members ensure their competence and impartiality.
12. Subcontracting	The existence of conflicts of interest, of confusion in the assignment of the responsibilities or of lack of competence of the subcontractor needs to be considered.	Not significant	BELAC does not subcontract any accreditation activity except in case of partnership with another accreditation body for assessments to be performed outside Belgium in compliance with the cross-frontier policy. By recursing only to accreditation bodies signatories of the EA-MLA, BELAC ensures the independence, impartiality and competence of the subcontractor. (References : BELAC 1-01)	Not significant	The documented provisions applicable in case of subcontracting to foreign accreditation bodies are strictly respected.
13. Acceptance of accreditation applications	No discriminatory condition can be used to refuse an accreditation application.	Not significant	The conditions to accept an application for accreditation do not include discriminatory clauses. (References : BELAC 1-01)	Not significant	

5 RESULTS OF THE IDENTIFICATION OF RISKS IN TERMS OF THE IMPLEMENTATION OF THE ACCREDITATION PROCESS

BELAC commits itself to take into account the risks at all levels of the performance of the accreditation process.

The following processes may negatively impact the level of performance and the reliability of the accreditation decisions and are given specific attention : the review of the applications for accreditation, the composition of the assessment teams, the duration of

	accreditation service in a specific regulated sector ;		recourse to accreditation for their regulatory tasks (References : BELAC 1-03, BELAC 3-07)		
	- the limited availability of Belgian assessors and experts in specific sectors considering that the level of technical competence and impartiality required by BELAC is high;	Medium	Whenever necessary, BELAC calls on foreign assessors/experts, which implies specific supervision (including providing information on national reglementary requirements) as well as management of the use of languages ; this may result in an increase of the accreditation costs. . (References : BELAC 3-05)	Medium	In 2021-2022-2023, training on ISO IEC 17065 and ISO IEC 17021-1 is provided with a view to training new assessors
	- the obligation for BELAC to comply with the rules applicable to all public services for the recruitment of permanent staff.	High	Despite the involvement of the BELAC management, recruiting cannot always be carried out in time to ensure an optimal operation of BELAC .	Medium	As of 01.04.2023, BELAC has 32 employees and a number of recruitments are still on the agenda

<p>2. Review of the applications for accreditation, composition of teams and duration of assessments</p>	<p>The composition of the teams and the duration of assessments shall make it possible to conduct each evaluation with the level necessary to demonstrate the organization's compliance with the accreditation requirements and its competence for the performance of the accredited activities</p> <p>The specific risks related to the organization and the work environment of the body are essential elements that shall be identified and taken into account. A proportionate approach is however necessary.</p>	<p>Medium</p>	<p>BELAC has defined guidelines for determining the skills to be included in an assessment team, the average assessment durations and the assessment techniques to be used. The objectives of the various types of assessment are taken into account as well as the factors of influence specific to each file: nature, complexity and volume of activities - location of the activity site (s) - results of previous assessments. Each determination of team composition and duration of the assessment is subject to a reasoned decision, recorded and subject to control.</p> <p>If it appears after the assessment that the team composition and / or the assessment duration did not allow the objectives of the assessment to be achieved, the Accreditation Board decides on the need to organize additional assessment or to strengthen the following assessment. (References : BELAC 5-02)</p>	<p>Low</p>	<p>Records are available</p> <p>Examples are documented and a specific mention is included in the decision letters</p>
<p>3. Assessment program</p>	<p>The program of assessments to be performed during an accreditation cycle is expected to cover a representative sampling of the accredited activities.</p> <p><i>Linked to the assessment plannings (see point 5 below).</i></p>	<p>Medium to high depending on the type of case</p>	<p>An accreditation program is prepared after each initial or renewal assessment ; the program may need to be updated in function of the evolution of the file. The accredited activities are defined according to the fields and sub-fields in order to facilitate and harmonize the sampling of activities to be assessed during each assessment. The specific</p>	<p>Low</p>	<p>The assessment programs are well defined.</p>

			requirements of regulations, EA/ILAC/IAF and of the conformity assessment schemes are taken into account. (References: BELAC 5-02, BELAC 6-017, BELAC 2-405 xxx)		
4. Extension of accreditation	Applications for extension of the accreditation have to be handled in such a way as to satisfy the expectations of the accredited bodies and the market (especially with respect to delivery time) without jeopardizing the reliability of the accreditations.	Medium	<p>BELAC considers the following processes for the extension of the accreditation scope :</p> <ul style="list-style-type: none"> - an administrative extension process when the applied extension falls within the general competence of the accredited body; - an extension with assessment (documentary or with on-site assessment) and a simplified or full decision-making process depending on the impact of the request for extension on the competence of the body. <p>Specific provisions in case of urgent requests due to extraordinary circumstances; these requests are given high priority. (References : BELAC 3-11)</p>	Low	<p>All decisions for significant requests for extension of accreditation are taken by the Board. In case of urgency, a decision-making process is organized by written correspondence. (see minutes of the Board)</p> <p>See cases related to recent crisis situations: (FIPRONIL, COVID-19)</p>
5. Respect of assessment plans	Performing the surveillance and renewal assessments according to the planning fixed in the accreditation decision is an essential element to ensure that compliance with the accreditation requirements is maintained. <i>Linked to the assessment programs(see point 3 above).</i>	Medium to high depending on the type of case.	The assessments planning is fixed per accreditation cycle with each initial or renewal accreditation decision. The planning may need to be updated at each moment of the cycle depending on the situation. All data related to the assessments plannings are traceable	Low to medium depending on the type of case	The assessment planning for complex cases (multi-standards, multi-sites, multi-activities) is not always sufficiently respected. The three factors that play a role in this are the availability of the assessors, capacity at

					the BELAC secretariat and the rigid attitude of the accredited bodies.
6. Implementation of the accreditation process in case of extraordinary events	Extraordinary events outside of the control of BELAC or of the accredited bodies may result in BELAC no longer being able to implement the accreditation process according to the documented provisions. A lack of control of the accredited bodies may endanger the reliability of the accreditations.	Rare but high risk when such situations are encountered.	BELAC considers any event that prevents the organization of assessments and in particular political events, natural or climate disasters and sanitary crises affecting one or more accredited bodies and / or BELAC services as an exceptional event In the case of an exceptional event, BELAC takes the necessary measures to control the situation (e.g. COVID-19 crisis). A general policy has been developed in this regard	Low	During the COVID-19 crisis, BELAC has carried out the organization of assessments in alternative ways (e.g. remote, more extensive use of document/file review). A further digitization of file management was implemented.
	The use of IT tools to perform remote assessments can be hindered by unstable connections or can be disrupted by the inadequacy of the tools. It must also be possible to guarantee the security of the data exchange.	Medium	A policy for conducting remote assessments has been introduced within BELAC. Guidelines are currently being developed at European and international level.	Low	BELAC restricted the use of IT tools and tried to split up the assessments. More documents were also requested in advance.

6 RESULTS OF THE IDENTIFICATION OF RISKS IN TERMS OF THE IMPLEMENTATION OF THE ORGANISATIONAL PROCESSES

Complementary to the issues related to the obligation for BELAC to operate with the necessary level of impartiality and to control the accreditation process, **the BELAC operational processes and their implementation through a documented management system may generate sources of risks and impact the general level of performance and the expectations with respect to accreditation.**

In this respect, specific attention has to be paid to the following issues :

Source of risk	Description and impact of the identified risk	Level of risk	Measures aiming to eliminate or minimize the risk	Residual risk	Situation as of 01.04.2023
1. Structure	Risk of confusion in the definition of tasks and responsibilities with respect to the management of BELAC and of the accreditation processes.	Not significant	The legislation governing the operation of BELAC together with the documented provisions of the management system specify the tasks and responsibilities of the involved functions. These provisions are strictly implemented. <i>(References : BELAC 0-05, BELAC 1-01)</i>	Not significant	
2. Resources	Insufficient resources in competent personnel for all functions involved in the accreditation process : see table 5 point 1 Lack in appropriate material resources (premises, equipment, IT tools) Financial resources : see table 1 point 8	Medium	IT tools are made available to BELAC by the FPS Economy. Improvements are however necessary to ensure an optimal management of the accreditation files and an effective communication between BELAC, its assessors and its accredited bodies.	Medium	The development of a new IT tool has been started.

3. Processes	Potential risks are related to shortcomings in terms of process documentation and/or harmonization in their implementation; Inadequate procedures for processing particularly complex accreditation files.	Low	The policies, procedures and instructions intended to support the functioning of BELAC are documented and regularly reviewed; control mechanisms to facilitate their implementation and check their adequacy in relation to the requirements applicable to an accreditation body are in place. Derogations made necessary by the processing of complex files must be documented and validated. <i>(References: all management system documents)</i>	Not significant	The document BELAC 6-001 (see dates of revision of the documents) demonstrates that the management system is living, with proper attention paid to the integration of the international requirements as well as for the development of BELAC specific documents.
4. Information and archiving	Risk of shortcomings in terms of : - protection of data with confidential character; - communication with concerned parties; - publication of relevant information on the operation of BELAC, accreditation requirements and data on accredited bodies.	Low	The policies, procedures and instructions intended to support the information and communication actions of BELAC are documented and regularly reviewed; control mechanisms to facilitate their implementation and check their adequacy in relation to the requirements applicable to an accreditation body are in place. Respect for confidentiality obligations is taken into account. BELAC only uses internal support services provided by the FPS Economy (IT management, maintenance of premises). <i>(References: all management system documents)</i>	Not significant	

	A systematic recourse to digital archiving may result in an increased risk with respect to the maintenance of data.	Low	A SLA with the responsible IT department of the FPS Economy is in place.	Not significant	
5. Management system	Risks of shortcomings in terms of conception, documentation and implementation of the management system.	Low	The management system is constantly evolving to respond to situations encountered in daily practice. Its development and the monitoring of its implementation are placed under the supervision of the Coordination Commission where all the parties concerned are represented. The conclusions and proposals for action to improve the efficiency of the system and the level of services provided by BELAC are presented during the management review.	Not significant	All decisions of the Coordination Commission are traceable (see minutes of the meetings) See also under point 3
	Risk of confusion between the ISO 9001 management system in force in E6 (Directorate general of Quality and Safety) on which BELAC administratively depends and the BELAC Management system in compliance with the requirements ISO/IEC 17011:2017	Not significant	The management system of E6 does not include the BELAC activities. The BELAC management system is fully separated with respect to the definition of the principles and policies, the development of the documents and their approval, as well as the supervision mechanisms.	Not significant	