

1. General

It is the policy of Pavement testing Services to operate its certification/ assessment services in a non-discriminatory manner. PTS shall not use procedures / processes to impede or inhibit access by applicants. Requirements as specified by BS EN ISO/IEC 17021-1 / Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020 / BS EN ISO 17065 / W15 PTS Product Acceptance Scheme (PTSPAS) in accordance with MCHW SHW Volume 1 Clause 104.15 and 104.16 are followed for all certification / assessment services and shall be accessible to all applicants whose activities fall within PTS scope of operations.

Access to the certification / assessment process is not conditional upon the size of the client or membership of any association or group, nor is certification conditional upon the number of certifications already issued.

PTS shall confine its requirements, evaluation, review, decision and surveillance in line with its policy, procedures and processes as required by its scope of certification.

The requirements against which the products of a client are evaluated shall be those contained in specified standards and other normative documents.

If explanations are required as to the application of the above documents for a specific certification scheme they shall be formulated by relevant and impartial persons or committees processing the necessary technical competence and shall be made available on request by PTS.

2. Application

PTS requires an authorised representative of the applicant organisation to provide necessary information to enable PTS to establish:

- The desired scope of certification
- The product(s) / system to be certified / assessed
- Relevant details of the applicant organisation as required by the specific certification scheme, including its name and the address(es) of its site(s), its processes and operations, human and technical resources, functions, relationships and any relevant obligations.
- Identification of outsourced processes used by the organisation that will affect conformity to requirements
- The standards or other requirements for which the applicant organisation is seeking certification
- Whether consultancy relating to the management system to be certified has been provided, and if so by whom.
- Information regarding outsourced processes used by the client that will affect conformity requirements, if the client has identified a legal entity/entities for producing the certified product(s) that is different from the client – to allow PTS to establish appropriate contractual controls – to be established prior to providing formal certification documentation
- Information concerning any issue of consultancy relating to the management system
- Other information needed in accordance with relevant certification requirements such as initial evaluation and surveillance activities

PTS shall require an authorised representative of the applicant, by completing the Application Form (W6F) to provide the necessary information/detail for certification or the client for a European assessment shall complete the European Assessment Document Form (T3F) to PTS Certification Management Representative.

3. Application Review

PTS shall conduct a review of the application and supplementary information by using form M4F/ M4F1 as applicable to ensure that

- The Information about the applicant organisation and its management system / product is sufficient for the conduct of the certification process
- Any known difference in understanding between PTS and the applicant organisation is resolved, including agreement regarding standards or other normative documents
- PTS has the competence and ability to perform all evaluation activities including competence and capability of certification personnel as M4 procedure (Contract Review)
- The scope of certification is defined
- The means are available to perform all evaluation activities
- PTS has the competence and capability to perform the certification activity

PTS shall have a process to identify when the applicant requests for certification includes

- A type of product or
- A normative document or
- A certification scheme

With which PTS has no prior experience.

In the above cases PTS shall ensure it has the competence and capability for all the certification activities it is required to undertake, and it shall maintain a record of the justification to undertake certification. PTS shall decline to undertake a specific certification if it lacks any competence or capability for the proposed certification activities.

Following review of the application PTS shall either accept or decline an application for certification. If the application is declined the reasons shall be documented on form M4F / M4F1 and the reasons made clear to the client.

If PTS relies on certifications, it has already granted to the client, or has already granted to other clients, to omit any activities, then PTS shall reference the existing certification(s) in its records. If requested by the applicant/client, PTS shall provide justification for omission of activities.

4. Evaluation

PTS shall have a plan for the necessary evaluation activities to be managed.

PTS shall assign and manage personnel to perform each evaluation task that it undertakes in line with W1 and W2 process.

PTS shall ensure all necessary information and/or documentation is made available for performing the evaluation tasks.

The products shall be evaluated against the requirements covered by the scope of certification and other requirements specified in the certification scheme.

PTS shall inform the client of all nonconformities. If one or more nonconformities have arisen, and if the client expresses interest in continuing the certification process, the PTS shall provide information regarding the additional evaluation tasks needed to verify that nonconformities have been corrected. If the client agrees to completion of the additional evaluation tasks, the process shall be repeated to complete the additional evaluation tasks.

The results of all evaluation activities shall be documented.

5. Certification Process

5.1 Audit Planning

Once the certification audit / assessment contract is received, the Certification Manager plans and programmes the audit / assessment (using V4 Audit Plan and V5 Audit Programme / T3 EAD and W15 PTS PAS) on the basis on audit / assessment time allocation and audit / assessment assignment, for

audits, which is defined as below and raise the audit plan, which states the requirements of the relevant management system standard, scheme document; size and complexity, name, address and scope of the client, date of audit and the audit team. It shall be sent to the auditors at the earliest opportunity (at least giving fourteen working days notice.) On receiving acknowledgement from the lead auditor / auditors, the audit assignment register will be completed, and the statement of confidentiality and no conflict of interest will be obtained. The Audit programme shall be sent to the client there after.

The Certification Manager shall confirm the date(s) for the auditor & technical expert detail with the client. If the assessment/audit is to be subcontracted, agreement in writing shall be gained from the client.

For European assessments, the process shall follow all steps as required in Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020 and PTS internal T procedures.

For PTS Product Acceptance Scheme refer to W15 PTS Product Acceptance Scheme (PTSPAS) in accordance with MCHW SHW Volume 1 Clause 104.15 and 104.16. The assessment and certification shall follow all steps as required in process W15

5.2 Audit Information

The audit programme shall be sent to the client at least ten working days prior to the audit. Confirmation of receipt and acceptance of the date(s) shall be attached to the office copy of audit programme.

5.3 Audits

The audit programme shall follow procedure V5 (Audit Programme)

5.3.1 Stage 1 Audit Planning

Planning shall ensure that the objectives of stage 1 can be met, and the client shall be informed of any "on site" activities during stage 1.

The stage one audit is performed by lead auditor at client's premises, to audit the client's management system documentation and to evaluate the client's location and site-specific conditions and to undertake discussions with the client's personnel to determine the preparedness for the stage 2 audit.

The lead auditor shall ensure the following objectives of stage 1 are to:

- Review the clients management system documented information.
- Evaluate the clients site specific conditions and undertake discussions with the clients personnel to determine the preparedness for stage 2
- To review the clients status and understanding regarding the objectives of the standard, in particular with respect to the identification of key performance or significant aspects, processes, objectives and operation of the management system
 - To obtain necessary information regarding the scope of the management system,
 - The clients site
 - including:
 - Processes and equipment used
 - Levels of control established (particularly in the case of multisite clients)
 - Applicable statutory and regulatory requirements
- Review the allocation of resources for stage 2 and agree the details of stage 2 with the client
- Provide a focus for planning stage 2 by gaining a sufficient understanding of the clients management system and site operations in context of the management system standards or other normative document

- Evaluate if the internal audits and management reviews are being planned and performed, and that the level of implementation of the management system substantiates that the client is ready for stage 2

At least part of the stage 1 audit shall be conducted at the clients premises, this can help to achieve the objectives, as above

5.3.2 Stage 1 Review

In determining the interval between stage 1 and stage 2, consideration shall be given to the needs of the client to resolve areas of concern identified during stage 1. PTS may also need to revise its arrangements for stage 2. If any significant changes which would impact on the management system occur, PTS shall consider the need to repeat all or part of stage 1. The client shall be informed that the results of stage 1 may lead to the postponement or cancellation of stage 2.

The interval between stage 1 and stage 2 audits shall be determined and consideration shall be given to the needs of the client to resolve areas of concern identified during the stage 1 audit. PTS shall also consider any revisions to its arrangements for stage 2 audit.

5.3.3 Stage-1 Audit Conclusions

Stage 1 does not require a formal audit plan/report, documented conclusions with regard to the fulfilment of the stage 1 objectives and the readiness for stage 2 shall be communicated to the client, including identification of any areas of concern that could be classed as a nonconformity at stage 2

5.4 Stage-2 Audits

Stage two audit is to evaluate the implementation, including effectiveness of the clients management system.

The stage 2 audit shall take place at the site(s) of the client. It shall include at least the following -

- Information and evidence about conformity to all the objectives of the applicable management system standard or other normative document
- Performance monitoring, measuring reporting and reviewing against key performance objectives and targets (consistent with the expectations in the applicable management system standard or other normative reference.
- The clients management system ability and its performance regarding the meeting of applicable statutory, regulatory and contractual requirements*

*In addition for Environmental Audits to EN ISO 14001, the meeting of applicable statutory, regulatory and contractual requirements shall be evaluated and confirmed that the client has a demonstrably effective EMS to ensure applicable statutory, regulatory and contractual requirements are met through its

- 1) public environmental policy commitment to meeting of applicable statutory, regulatory and contractual requirements (4.2);
 - 2) identification and having access to applicable legal requirements and other requirements related to its environmental aspects (4.3.2a);
 - 3) how those legal requirements apply to the organisation's environmental aspects (4.3.2b);
 - 4) objectives/targets/programs (4.3.3)
 - 5) how legal obligations are routinely managed and monitored (4.4.6 and 4.5.1);
 - 6) evaluation of legal compliance (4.5.2);
 - 7) corrective and preventive actions where necessary (4.5.3);
- Operational control of the clients processes in line with relevant standard(s) / CoP / Guidelines / etc. Particular attention for PTS Product Acceptance Scheme (PTSPAS) in accordance with MCHW SHW Volume 1 Clause 104.15 and 104.16 requirements shall include Section 8.3 of BS EN ISO 9001:2015 -

- Design and development planning (8.3.2)
 - Design and development inputs (8.3.3)
 - Design and development controls (8.3.4)
 - Design and development outputs (8.3.5)
 - Design and development changes (8.3.6)
 - Product suppliers shall hold BS EN ISO 9001 / FPC requirement
 - Installers shall hold BS EN ISO 9001 / NHSS
- Internal auditing and management review
- Management responsibility for the clients policies

Any links between normative requirements, policy, performance objectives and targets, legal requirements, responsibilities, competence of personnel, operations, procedures, performance data and internal audit findings and conclusions

The client shall be informed of all non-conformities. The client shall be provided with information regarding the additional evaluation tasks needed to verify that the non-conformities have been corrected

5.4.1 Stage-2 Audit Report

After the stage two audit the auditor shall submit their finding & advise by written report.

5.5 Review

The audit team shall analyse all the information / evidence gathered at both stage 1 and stage 2 audits to review and agree audit conclusion.

All the information provided by the audit team shall be forwarded to PTS Certification Management team to enable decision to be made, by the decision committee, information shall include audit reports, comments and non-conformities and where applicable the correction and corrective actions taken by the client, confirmation of the information provided as used in the application review and a recommendation whether or not to grant certification together with any conditions or observations.

PTS shall assign at least one person to review all information and results. The review shall be carried out by person(s) who have not been involved in the evaluation process.

Recommendations for a certification decision based on the review shall be documented, unless the review any the certification decision are competed concurrently by the same person.

For the required stages of PTS PAS refer to W15 PTS Product Acceptance Scheme refer to W15 PTS Product Acceptance Scheme (PTSPAS) in accordance with MCHW SHW Volume 1 Clause 104.15 and 104.16.

5.6 Maintenance / Surveillance audits

Maintenance of assessment and certification activities include on-site auditing of the client's system. Surveillance audits are on site audits, but are not necessarily full system audits, and shall be planned together with the other surveillance activities so PTS can maintain confidence that the clients certified management system continues to fulfil requirements between recertification audits. Certification is maintained provided that the client complies with the conditions of certification:

- The name and address of the client is that which appears on the certificate
- The certificate is not assigned to another organisation
- The certificate has not been lost or altered without the authorisation of PTS Ltd
- The client shall use the certification mark in accordance with PTS Logo use and Terms of Business
- The client is not promoting certification for products or services other than those covered by the certificate
- The client is not claiming compliance with other standards using the certificate or audit report other than that appearing on the certificate

- Certificates or promotional materials associated with them are not promoting erroneous or misleading information
- The client must permit ongoing surveillance and access to documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and client's subcontractors.
- The client must investigate complaints associated with the certified products or services. Records of such complaints, and actions taken, must be kept by the client, and made available to PTS Ltd when requested.
- The client must allow participation of observers during surveillance audits when requested.
- For any major nonconformity or other situation that may lead to suspension or withdrawal of certification, one of PTS Ltd Certification Managers will determine whether certification can be maintained.

Surveillance audits will be conducted at least once a calendar year except in recertification years. The date of the first surveillance audit following initial certification shall not be more than 12 months from the certification decision date. Adjustments to frequency of surveillance audits to accommodate seasons or management system certifications of a limited duration may be made. Details to be documented within visit report.

These audits shall include at least (depending on Management system audited):

- internal audits and management review
- a review of actions taken on nonconformities identified during previous audit
- complaints handling
- effectiveness of the management system with regard to achieving the certified clients objectives and the intended results of the respective management system(s)
- progress of planned activities aimed at continual improvement continual operational control
- review of any changes
- use of marks and/or any other reference to certification
- Factory Production Control
- Type Testing.
- The clients management system and performance regarding legal compliance

For Multi Site organisations refer to W7 Process.

For Environmental Audits to BS EN ISO 14001:2015 - All subsequent surveillance and reassessment audits shall be consistent in line with Stage 2 requirements as section 4.4 above, to enable verification of the management of legal compliance based on demonstrated implementation of the system

The date of the first surveillance audit following initial certification shall not be more than 6 months from the last day of the stage 2 audit.

Surveillance audits shall cover representative areas and functions covered by the scope of the clients management system on a regular basis as above with a 3 year re-certification whereby all areas of the scope shall be audited as W3 process (On Site Audit). Other surveillance activities may include

- Enquiries from PTS to the client on aspects of certification
- Reviewing any clients statements with respect to its operations (eg promotional material, website)
- Requests to the client to provide documents and records and
- Other means of monitoring their performance (eg clients KPI performance on its contracts, customer complaints against the client)

Should a client hold other granted certification and has audits performed by another PTS, PTS shall obtain and retain sufficient evidence, such as reports and documentation on corrective actions, to any nonconformity. (V5 Audit programme)

6. Granting Certificate

The Certification Management Team is appointed from the auditors and experts working with PTS to consider specific recommendations made in relation to granting, maintaining, extending, reducing, suspending and withdrawing certification. Members of the impartial Technical Panel will be independent from the auditing activity. Technical requirements will be arranged as necessary, where technical expertise will cover the certification scope being considered. The technical expertise is impartial & free from commercial or financial pressure.

7. Appeal, Complaints and Disputes

Any appeals, complaints and disputes shall be dealt with in accordance with Certification Management Process W5 (Appeals and Disputes Process) and W10 (Complaints Process).

8. Actions Prior to Making A Decision

PTS shall conduct an effective review prior to making a decision for granting certification, expanding or reducing the scope of certification, renewing, suspending or restoring, or withdrawing of certification, including that:

That the information provided by the audit team is sufficient with respect to the certification requirements and the scope for certification

- For any major non-conformities, it has reviewed, accepted and verified the correction and corrective actions
- For any minor non-conformities, it has reviewed and accepted the clients plan for correction and corrective action

Failure to fulfil one or more requirements of the management system standard or a finding/situation causes significant doubt about the ability of the client's management system to achieve its intended inputs and it has reviewed and accepted the clients planned correction and corrective action for any other nonconformities

9. Information for granting initial certification

The information provided by the audit team to PTS for the certification decision shall include as a minimum:

- The audit report
- Comments on the non-conformities, and where applicable, the corrective actions taken by the client
- Confirmation of the information provided to PTS used in the application review
- Confirmation that the audit objectives have been achieved
- A recommendation whether or not to grant certification, together with any conditions or observations

If PTS is not able to verify the implementation of corrections and corrective actions of any major non-conformity within 6 months of the last day of stage of 2, PTS shall conduct another stage 2 prior to recommending certification.

When a transfer of certification is envisaged from another PTS to PTS, sufficient information shall be obtained through this process in order to take a decision on certification

10. Information for granting recertification

PTS shall make decisions on renewing certification based on the results of the recertification audit, as well as the results of the review system over the period of certification and complaints received from users of certification.

11. Certification Decision

PTS shall be responsible for, and shall retain authority for, its decisions relating to certification. PTS shall assign at least one person to make the certification decision based on all information relating to the evaluation, its review, and any other relevant information. The certification decision shall be carried out by a person or group of persons that has not been involved in the process for evaluation.

PTS shall ensure that persons or committees that make decisions for granting or refusing certification, expanding or reducing the scope of certification, suspending or restoring certification, withdrawing certification or renewing certification are different from those who carried out the audits. The individual(s) appointed to conduct the certification decision shall have appropriate competence in line with W1 process.

The person(s) excluding members of committees assigned by PTS to make a certification decision shall be employed by or be under a legally enforceable arrangements with either PTS or an entity under PTS control.

PTS's organisation control shall be either:

- a. whole or majority ownership of another entity by PTS
- b. majority participation by PTS on the board of directors of another entity
- c. a documented authority by PTS over another entity in a network of legal entities, linked by ownership or board of director control

All persons employed by, or under contract with, entities under organisational control shall comply with all PTS policies, procedures and processes as PTS personnel or under contract with PTS.

All certification decisions shall be recorded including any additional information or clarification sought from the audit team or other sources. (W9F form). PTS shall notify the client of a decision not to grant certification and shall identify the reasons for the decision.

12. Certification Documents

PTS shall provide certification documents to the client by any means they choose. No certification documents shall be provided/issued prior to the effective date of the certification decision.

The certification documents shall at least contain:

- The name and address and geographic location of the client whose management system is certified
- The dates of granting, extending or renewing certification
- The expiry date or recertification due date consistent with the recertification cycle
- A unique identification code
- The standard and/or other normative document, including issue number and/or revision, used for audit of the certified client
- The scope of certification with respect to product/service, process etc as applicable at each site
- PTS name address and certification mark / other marks (accreditation symbol) ensure they are not misleading or ambiguous
- Any other information required by the standard and/or other normative document used for certification
- A means to distinguish any revision of the certification documents from any prior obsolete documents
- The certificate shall be signed by the Managing Director as the defined authorised signatory for certificate issue

Formal certification documentation shall only be issued after, or concurrent with, the following;

- The decision to grant or extend the certification extend the scope of certification has been made
- Certification requirements have been fulfilled
- The certification agreement has been completed / signed

12.1 Certification Documents for Multi Site Organisation

PTS shall provide certification documents to the client by any means they choose. No certification documents shall be provided/issued prior to the effective date of the certification decision, refer to W7

process.

The certification document shall reflect the scope of certification and the sites and / legal entities (where applicable) covered by the multi site certification.

The certification documents shall contain:

- The name and address of all the sites,
- the scope or other reference on these documents shall make it clear that the certified activities are performed by the sites on the list. If a site's activities only include a subset of the organisations scope, the certification document shall include the site's sub-scope. When temporary sites are shown on the certification documents, such sites shall be identified as temporary

Where certification documents for one site are issued, they shall include;

- That it is the management system of the whole organisation which is certified
- The activities performed for that specific site / legal entity which are covered by this certification
- Traceability to the main certificate eg identification code
- A statement saying "the validity of this certificate depends on the validity of the main certificate"

Under No circumstances, can this certification document be issued to the name of the site / legal entity or suggest that this site / legal entity is certified, nor shall it include a declaration of conformity of the site processes / activities to the normative document.

The certification document will be withdrawn in its entirety if any of the sites does not fulfil the necessary provisions for the maintenance of the certification.

13. Directory of Certification

PTS shall maintain a directory of information on certified products and clients. The directory shall contain at least-

- Identification of the product
- The standard(s) and other normative document(s) to which conformity has been certified
- Identification of the client

The parts of the above information that need to be published or made available on request in a directory are stipulated by the relevant schemes. As a minimum PTS shall make available / provide information, upon request, about the validity of a given certification.

14. Maintaining Certification

PTS shall maintain a client's certification based on the demonstration that the client continues to satisfy the requirements of the management / product system standard.

If surveillance is required by the certification scheme, PTS shall initiate surveillance of the system / products in accordance with the certification scheme.

Surveillance may take the form of the periodic surveillance of marked products to ensure ongoing validity or ongoing surveillance of processes or services.

PTS may maintain a clients certification based on a positive conclusion by the audit team leader without further independent review and decision provided that:

- For any major non-conformity or other situation that may lead to suspension or withdrawal of certification, PTS has a system which requires the audit team leader to report the need to initiate a review by competent personnel, different from those who carried out the audit, to determine whether certification can be maintained
- Competent personnel of PTS monitor surveillance activities, including monitoring the reporting by its auditors, to confirm that the certification activity is operating effectively.

15. Changes Affecting Certification

All new or revised changes to requirements for certification activities that affect the client shall, following full consideration of effective date of changes and review shall be notified to all clients. PTS shall check that each certified client makes necessary adjustments within the reasonable specified time frame.

PTS shall verify the client complies with the new requirements. PTS shall also consider other changes affecting certification, including changes initiated by the client and decide upon the appropriate action necessary.

Certified clients are required to notify PTS without delay of matters that may affect the capability of the management system ie legal or commercial organisation status or ownership, contact address and sites, management and organisation, scope, major changes to the management system and processes, etc.

PTS shall also be informed of any intended modification in the product, production process or quality system which may affect product conformity, the client agrees that product shall not be released until PTS has been notified and PTS has determined if investigation is required.

Actions to implement changes affecting certification shall include, if required an evaluation, review and a decision on the changes.

Revised formal certification documentation to either extend or reduce the scope of certification shall be issued, along with issuance of formal certification documentation of revised surveillance activities to either extend or reduce the scope of certification shall be issued.

Records shall be maintained and shall also include the rationale for excluding any activities.

16. Recertification

A re-certification / renewal audit is required every three / five years (dependent on system / CE mark). This takes place prior to the expiry date of the certificate. Recertification may/will involve additional/extra audit days/time.

To confirm the continued conformity and effectiveness of the management system the recertification audit shall be planned and conducted to evaluate the continued fulfilment of all the requirements of the management system or other normative document. Recertification requirements shall be planned and conducted to enable for timely renewal before the certificate expiry date.

Recertification activities shall include the review of previous surveillance audit reports and consideration of the performance of the management system over the most recent certification cycle.

For Multi-Site organisations refer to W7 Process.

Consideration shall be given to the Recertification audit activities if there have been significant changes to the management system, the organization, or the context in which the management system is operating (e.g. changes to legislation).

The recertification audit shall include an on-site audit that addresses the following:

- a) the effectiveness of the management system in its entirety in the light of internal and external changes and its continued relevance and applicability to the scope of certification;
- b) demonstrated commitment to maintain the effectiveness and improvement of the management system in order to enhance overall performance;
- c) the effectiveness of the management system with regard to achieving the certified client's objectives and the intended results of the respective management system (s).

For any major nonconformity, PTS shall define time limits for correction and corrective actions. These

actions shall be implemented and verified prior to the expiration of certification.

When recertification activities are successfully completed prior to the expiry date of the existing certification, the expiry date of the new certification can be based on the expiry date of the existing certification. The issue date on a new certificate shall be on or after the recertification decision.

If PTS has not completed the recertification audit or PTS is unable to verify the implementation of corrections and corrective actions for any major nonconformity prior to the expiry date of the certification, then recertification shall not be recommended and the validity of the certification shall not be extended. The client shall be informed and the consequences shall be explained.

Following expiration of certification, PTS can restore certification within 6 months provided that the outstanding recertification activities are completed, otherwise at least a stage 2 shall be conducted. The effective date on the certificate shall be on or after the recertification decision and the expiry date shall be based on prior certification cycle.

17. Extension or Changes to The Scope or Details of Registration

When certification scheme introduces new or revised requirements that affect the client, PTS shall ensure these changes are communicated. PTS shall verify the implementation of the changes by its clients and shall take actions required by the scheme.

Changes shall be considered that affect certification, including changes initiated by the client, ie changes to the scope of registration, changes in performance, change of name or address, additional standards / products / processes or other changes required, these shall be reviewed and decided upon for the appropriate action by PTS.

A desk top review will be conducted, and decision for changes to be implemented shall include as necessary an evaluation, a review and decision and any other requirements ie additional audit may be required to verify the changes or additions. Issuance of revised certification documentation to extend or reduce the scope.

The client shall be informed of any required changes to the surveillance activities.

PTS shall, in response to an application for expanding the scope of a certification already granted, undertake the review as above. The client shall give notification of changes prior to any planned surveillance activities.

All details shall be recorded and include the rationale for excluding any of above activities (eg: when a certification requirement that is not a product requirement changes, and no evaluation, review or decision activities are required).

It may be necessary for PTS to conduct audits of certified clients at short notice or unannounced to investigate complaints, or in response to changes, or as follow up on suspended clients.

In such cases:

- a) PTS shall describe and make known in advance to the certified clients the conditions under which such audits will be conducted;
- b) PTS shall exercise additional care in the assignment of the audit team because of the lack of opportunity for the client to object to audit team members.

18 . Records

PTS shall retain records to demonstrate that all certification process requirements have been effectively fulfilled. All records shall be kept as confidential. Records shall be transported, transmitted and transferred in a way that ensures confidentiality is maintained. If the certification scheme involves complete re-evaluation of the product(s) within a determined cycle, records shall be retained at least for the current and the previous cycle. Otherwise, records shall be retained in accordance with M2 procedure.