

## Sub-contract inspection process for inspection bodies

### Introduction

We hope this document will help to explain how we initiate agreements with inspection bodies, so that they can undertake Soil Association inspections on our behalf. Some organic operators, outside the UK and around the world, wish to have their products directly certified by Soil Association Certification Ltd (SA Certification). Frequently this is to gain use of the SA symbol and improve their UK market access. This guide explains the service we offer operators which, with the cooperation of other certifiers, delivers the same quality certification but can reduce the costs of inspecting.

We can offer subcontracted inspection (SCI) to these operators by entering into an SCI agreement with an appropriate inspection body. This agreement provides a framework by which the inspection body makes the inspection visit to the operator, providing us with the information necessary to make our certification decision. Costs for the operator are reduced, the process of inspection and certification is quicker, and our service to our operators is maintained. Please note that in the first year the operator applies for Soil Association certification we directly inspect, although we are very happy to use this visit as an opportunity to show how we operate our audits, and would welcome your inspector shadowing ours at the application inspection.

The benefits to you, as a party to this process, include increased income, recognition for inspecting to SA Certification standards and increasing the range of services you offer to your customers. This guide details the steps we go through to approve you as an inspection body. Annex 2 outlines the process we use to sub-contract an inspection on behalf of our operators.

### Approving inspection bodies for sub-contract inspections

After reading this document, if you are interested in undertaking inspections on behalf of SA Certification, please send the necessary information to:

Helen Davies                      hdavies@soilassociation.org                      Tel: +44 (0) 117 987 4609    or  
Andrew Bayliss                      abayliss@soilassociation.org                      Tel: +44 (0) 117 987 4597

### What you need to provide

- The information listed in Annex 1 and 2 of this document.
- Details of your contact person who will communicate with us, in English, to arrange subcontract inspections.

### What we provide to you

- A copy of the contract SA Certification signs with its operators.
- Online access to the Soil Association standards (please let us know if you need a paper copy).
- Soil Association inspection templates. When you carry out inspections for us you can complete them alongside your own annual inspections. Our standards and processor inspection templates are also on our website. We will need to send you a separate template for producer inspections.
- Once we receive your information we review it against our set criteria, and let you know if it is sufficient, or detail any extra information we need.
- We will also send you an agreement to sign. We will email the agreement to you, but if you prefer us to post it please let us know. Please print two copies and sign and send us both. We will then countersign them and return a copy to you.
- Once we have received your signed agreement you will be added to our list of approved sub-contract inspection bodies. This list is available on our website.

### Updates

After signing the agreement you will need to keep us updated with any changes within your organisation that may affect this agreement. We will keep in touch with you to ensure we have the latest information about your work, accreditation and inspectors. Similarly, if changes occur within SA Certification, we will keep you updated.

## Annex 1 – Information to provide

The three sections in Annex 1 detail the information required from inspection bodies, depending on their existing accreditations and approvals:

- For IFOAM-accredited certification bodies, certification bodies accredited to EN45011 (ISO 65) or inspection bodies accredited to EN45004 (ISO 17020).
- For EU certification bodies and certification bodies recognised by Defra
- For other certification/inspection bodies

### a) IFOAM, ISO 65 (EN45011) or ISO 17020 (EN45004) accredited certification or inspection bodies

Information required	Please tick if submitted
<p><b>Inspector profiles</b></p> <p>We do not need CV information but we do wish to build a profile of inspectors who have the qualifications and experience we require. Please complete and submit the inspector profile document (ref. I611Fm).</p>	<input type="checkbox"/>
<p><b>Inspection fees</b></p> <p>If you already inspect a certain operator, we would prefer to subcontract their inspection to you, where possible. This allows both your inspection and the Soil Association inspection to be carried out in the same visit, and saves the operator additional costs. In the event that the two inspections can be combined we would like details from you of the typical 'combined' inspection charges which you would make to SA Certification.</p> <p>Inspection fee information enclosed.</p>	<input type="checkbox"/>

**b) EU certification bodies/certification bodies recognised by Defra**

<b>Information required</b>	<b>Please tick if submitted</b>
General information (name, address, phone numbers and legal status).	<input type="checkbox"/>
Description of the inspection body's areas of activity and competence.	<input type="checkbox"/>
Relevant job descriptions (inspectors and their managers).	<input type="checkbox"/>
Policy statement on qualifications and training of inspection personnel.	<input type="checkbox"/>
Procedures and programmes for inspector training and witness inspections. To include specific training on sub-contracted inspections for SA Certification.	<input type="checkbox"/>
Policy on conflict of interests. Please include details on how you are informed of these and the action taken when any are raised.	<input type="checkbox"/>
<p><b>Inspector profiles</b></p> <p>We do not need C.V information, but we do wish to build a profile of inspectors who have the qualifications and experience we require.</p> <p>Please complete and submit the inspector profile document (ref. I611Fm).</p>	<input type="checkbox"/>
<p><b>Inspection fees</b></p> <p>If you already inspect a certain operator we would prefer to subcontract their inspection to you, where possible. This allows both your inspection and the Soil Association inspection to be carried out in the same visit, and saves the operator additional costs. In the event that the two inspections can be combined we would like details from you of the typical 'combined' inspection charges which you would make to SA Certification.</p> <p>Inspection fee information enclosed.</p>	<input type="checkbox"/>

### c) Other certification/inspection bodies

Where the inspection body is not accredited to either IFOAM, EN45011 or EN45004 the following **must** be submitted. You may have this information available in one document (e.g. Quality Manual), in which case please submit that document and indicate below where in that document this information can be found:

<b>Information required</b>	<b>Please tick if submitted</b>
Details of liability insurance.	<input type="checkbox"/>
General information (name, address, phone numbers and legal status).	<input type="checkbox"/>
Management statement assigning the person responsible for quality who has access to top management.	<input type="checkbox"/>
Description of the inspection body's areas of activity and competence.	<input type="checkbox"/>
Information of the inspection body's relationship to its parent or associated organisations (where applicable).	<input type="checkbox"/>
Organisational charts.	<input type="checkbox"/>
Relevant job descriptions (inspectors and their managers).	<input type="checkbox"/>
Policy statement on qualifications and training of personnel.	<input type="checkbox"/>
Procedures and programmes for inspector training and witness inspections. To include specific training provided to carry out inspection on behalf of SA Certification.	<input type="checkbox"/>
<b>Please send CVs and</b>	<input type="checkbox"/>
Completed inspector profiles document (ref. I611Fm) detailing qualifications and relevant and recent experience.	<input type="checkbox"/>
Procedures for the control of documents.	<input type="checkbox"/>
Procedure/ policy for the retention of records (including which records are retained and for how long).	<input type="checkbox"/>
Procedures and programme for internal audits.	<input type="checkbox"/>
Procedures for feedback and corrective action of internal audits or witness inspections.	<input type="checkbox"/>
Procedures for management review of the quality system.	<input type="checkbox"/>
Policy/procedure on conflict of interests. Please include details on how you are informed of these and the action taken when any are raised.	<input type="checkbox"/>
Policy/procedure on confidentiality.	<input type="checkbox"/>
Procedure for allocation of inspections.	<input type="checkbox"/>
Procedure for frequency of inspections.	<input type="checkbox"/>
Procedure for complaints and appeals (records must also be kept of these).	<input type="checkbox"/>
Distribution list of the quality manual.	<input type="checkbox"/>
<b>Inspection fees</b>	
If you already inspect a certain operator we would prefer to subcontract their inspection to you, where possible. This allows both your inspection and the Soil Association inspection to be carried out in the same visit, and saves the operator additional costs. In the event that the two inspections can be combined we would like details from you of the typical 'combined' inspection charges which you would make to SA Certification.	<input type="checkbox"/>
Inspection fee information enclosed.	

## Annex 2 – Guidance

### The first year

The operator contacts SA Certification and obtains an application pack. They complete the application form and product specification sheets and apply to us for certification, noting their current inspection body and listing the products they have licensed.

If the operator indicates that they are happy for you to carry out their Soil Association inspection, we contact you to see if you are interested in signing a sub-contract inspection contract with us.

In the meantime we start arranging our first inspection of the applicant. SA Certification maintains a direct relationship with all its operators, so we generally send our own inspectors to complete the first Soil Association inspection. Where possible, you will be invited to witness this application inspection. We have found that this experience is often very helpful in terms of mutual understanding and future communication between all parties, and also allows an opportunity for the operator and yourselves to clarify aspects of the Soil Association requirements.

### The process

In the second year, if all parties wish it, we will approach you to carry out the Soil Association inspection. If you normally carry out the operator's annual inspection for local legal requirements it should usually be possible to carry out the Soil Association's inspection at the same visit. For processing operators, our systems normally allocate the same inspection month to an operator from year to year (for example, in February every year). We aim to contact you several months before the Soil Association inspection is due, to discuss arrangements for the inspection. However, we are aware that many inspection bodies vary the inspection month of their operators. If we have not contacted you by the time you start making plans for the operator's annual domestic inspection, please get in touch with us to let us know when you are likely to be inspecting.

Before carrying out each Soil Association inspection, please ensure we have confirmed to you that we want you to do this particular inspection. Every few years we like to send our own inspectors so we can maintain our direct relationship with the operator. The operator, as part of the contract we sign with them, has the right to request a Soil Association direct inspection. Also, before an inspection goes ahead, we will need to agree: your estimate of inspection costs; approve the inspector; and send you our current details on the operator and our inspection requirements.

### Timings

- 1 Once we have contacted you to ask if you will do our inspection, please respond with the details we need, including an estimate of costs, the inspector profile and an indication of when you would aim to inspect.  
**Inspection body response time: within 10 days of our request**
- 2 We will confirm with the operator that they are prepared to pay this amount for their Soil Association inspection (we usually invoice them in advance of the inspection). Once we have the details you sent, we ask you to go ahead and arrange the Soil Association inspection. We inform the operator that you will be contacting them.  
**SA Certification response time: within 10 days of receiving your information**
- 3 You make inspection arrangements with the operator, and let us know the agreed date.  
**Inspection body response time: within 10 days of receiving SA Certification confirmation**
- 4 We will send you the information you need to do this inspection for us.  
**SA Certification response time: where possible, 15 working days prior to inspection date**
- 5 You carry out the inspection, complete our inspection report (in English) and return it to us. You also invoice us directly for your invoice inspection costs.  
**Inspection body response time: 21 working days following inspection**
- 6 We check your inspection report meets our quality requirements. If so, we authorise your invoice for payment  
**SA Certification response time: 10 working days**
- 7 We complete our normal certification decision process, and then issue a licence to the operator for products they wish to market with the Soil Association symbol.

## Key inspection checks

The report you complete for us must include sufficient information and objective evidence to enable our certification department to verify Soil Association standards have been met and to make an independent certification decision. Inspectors must respond to all questions. We need the report completed in this way so that our certification department gets a full picture of the operation. We provide guidance to inspectors on completing our report. This is available on our website, together with our standards, an example of the how our inspection reports need to be completed, and other information.

Vital points inspectors must address at inspection include:

- checking that the Soil Association symbol is only applied to products licensed by Soil Association Certification Ltd. Products we certify are listed on the 'information schedule' that we send you as part of your information pack, in advance of the inspection;
- verifying that the details on the information schedule are correct, and confirming this in the report. For producers, this means checking the fields, holdings and enterprises; for processors, the product and enterprise information;
- writing a detailed 'input/output balance audit' and traceability audit report for products audited;
- for processors, reviewing the organic sales records for SA-certified products and confirming they match the previous certified sales declaration figure (we send you this in advance).

## Level of service/feedback

To ensure that consumer trust in the Soil Association symbol is maintained and as part of EN45011 accreditation and quality systems compliance, we need to ensure that the inspection reports we receive from sub-contract inspection bodies are of a similar quality to those completed by our own inspectors.

Therefore, subcontracted inspection reports we receive will be reviewed based on risk assessment by our inspection manager, who will complete an inspection report review form for reports where feedback is required. We will send you a copy, indicating where the report does and does not meet our requirements. Where required, you must respond with any corrective actions and send the review form, along with any corrective action evidence to us within a specified timescale. If we identify any serious deficiencies with the report, we will either request further information from you, or request a revised report which is more adequately completed. If a report cannot be used you may need to undertake the inspection again at your expense. When this is not possible we will undertake the inspection ourselves. In the majority of cases, when the report review confirms that your report is satisfactory, we will authorise payment of your invoice.

We hope that this process works well for you; however we are always looking to improve our systems and always appreciate any comments.