

INTERNATIONAL RECRUITMENT INTEGRITY SYSTEM (IRIS)  
VOLUNTARY MULTI-STAKEHOLDER CERTIFICATION SCHEME  
FOR LABOUR RECRUITERS

IRIS CERTIFICATION SCHEME MANUAL  
  
GENERAL REQUIREMENTS DOCUMENT

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## 1. INTRODUCTION AND GENERAL REQUIREMENTS

### 1.1. Introduction

The International Recruitment Integrity System (IRIS) is a voluntary multi-stakeholder standard system for Labour Recruiters, part of IRIS: Ethical Recruitment Initiative ( [www.iris.iom.int](http://www.iris.iom.int)). The IRIS Certification Scheme (the Scheme) focuses on international recruitment of migrant workers within labour migration corridors and labour supply chains. The Scheme is global and not limited to any country or sector.

The Scheme uses the IRIS Standard to verify Labour Recruiters' conformity to ethical recruitment principles.

The IRIS Standard has been developed through extensive consultations with stakeholders, experts and practitioners, and is based on international human rights instruments and labour standards such as UN Guiding Principles on Business and Human Rights, ILO Conventions and standards, ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs, Dhaka Principles for Migration with Dignity, World Employment Confederation Code of Conduct, as well as best practices of corporate social responsibility code of conducts and best practices from government regulators and the recruitment industry.

### 1.2. Scheme Overview

The IRIS Standard forms the “technical standard” against which Labour Recruiters are assessed in the IRIS Certification scheme. The scheme aims to provide confidence that an IRIS-certified Labour Recruiter's processes and performance meet defined expectations in those areas that it can control and over which it may be expected to have an influence.

IRIS Certification is based on periodic, independent third-party audits. Scheme-accredited independent Audit Companies evaluate the Labour Recruiter's management controls (policies, procedures, training, communication, monitoring, and governance) and demonstrable performance (control points indicators, information, data and records) to evaluate overall adherence to the IRIS Standard, applicable legislation in countries where the Labour Recruiter operates, and the Labour Recruiter's own declarations.

### 1.3. Terms and Definitions

*Note: The terms and definitions below are derived from the current version of ISO 19011 “Guidelines for auditing management systems” and “IOM, Glossary on Migration, International Migration Law Series No. 25, 2011”. Definitions below are also specific for the purpose of the scheme. These terms apply throughout all IRIS Certification Scheme documentation.*

#### **Industry and Scheme Related Definitions**

- 1.3.1. IRIS** – International Recruitment Integrity System.
- 1.3.2. Scheme** – The IRIS Certification Scheme (or aspects thereof).
- 1.3.3. Scheme Owner (IRIS Secretariat)** – Has overall responsibility for IRIS Standard and Certification Scheme design, governance, credibility, performance and ongoing improvement.
- 1.3.4. Scheme Manager** – Independent organization appointed by Scheme Owner to develop, maintain and implement IRIS Conformity Monitoring and Integrity Program in accordance

with the requirements of these General Requirements and the requirement of normative documents invoked therein.

- 1.3.5. Labour Recruiter** – for the purpose of IRIS Scheme, in this document the term Labour Recruiter applies to private recruitment agencies that offer labour recruitment services. Labour Recruiters can take many forms, whether for profit or non-profit, operating within legal and regulatory frameworks. Labour Recruiter is the subject of IRIS Certification (may be prospective Applicant, an Applicant, or a certified Labour Recruiter).
- 1.3.6. Applicant** – Labour Recruiter that has applied for, but not yet been granted, IRIS Certification.
- 1.3.7. (IRIS) Certified Labour Recruiter** – Labour Recruiter that has been granted IRIS Certification.
- 1.3.8. IRIS Certification Manager** – Competent individual appointed and authorized by Labour Recruiter’s Senior Management to make decisions regarding the organization’s certification activities, and to be the primary point-of-contact (both internally and externally) for IRIS-Related issues.
- 1.3.9. Business Partner** – collective term for various types of individual or entity with which Labour Recruiter formally collaborates in order to provide recruitment services.

**Notes:**

- *This definition includes any individual or entity with which a labour recruiter has a standing relationship. In this sense ‘employer’ also falls within the definition of ‘business partner’, but, because additional requirements apply, ‘employer’ is usually singled-out as its own special category .*
- *The following entities typically fit the definition of ‘business partner’: secondary recruitment/employment agency, medical facility, visa processing facility, pre-departure orientation service provider, hotel/dormitory, ticketing office, vocational training/skills verification/certification entity, transport company. This list is not exhaustive and other entities may be included, depending how the recruitment operation of a labour recruiter is organized.*
- *It is recognized that a labour recruiter may occasionally collaborate with an individual or entity that does not strictly fall strictly within the above definition of ‘business partner’, but whose products or services are critical to the quality or integrity of labour recruitment services. Under such circumstances the labour recruiter is, nonetheless, expected to exercise an appropriate level of due diligence and risk control over that individual or entity.*
- *It is further recognized that, for objective reasons, a labour recruiter may not have the necessary level of influence or control over some business partners (for example, embassies, consulates or other government-related entities) to fulfil all ‘business partner’ implications of the IRIS Standard. Under such circumstances the labour recruiter is, nonetheless, expected to demonstrate dialogue and collaboration with such business partners to the extent required to ensure that IRIS principles are not breached.*

- 1.3.10. Labour Recruiter Client** – Collective terms which refers to employer and migrant workers for whom labour recruiter provides recruitment services.
- 1.3.11. Employment Agency** – Agency in destination country which places migrant worker into place of employment.
- 1.3.12. Subcontractor** – A person or business (operating as a registered entity) which has a contract (as an “independent contractor and not an employee”) with a contractor (labour

recruiter) to provide some portion of the work or services on a project which the contractor has agreed to perform. The subcontractor is paid by the contractor for the services provided.

- 1.3.13. Sub-Agent** – Both formal and informal intermediary who may participate in recruitment of the migrant worker from country of origin.
- 1.3.14. Employer** – a person or an entity that engages employees or workers, either directly or indirectly.
- 1.3.15. Migrant Worker (Worker)** – a person who intends to migrate, migrates, or has migrated to a country of which he or she is not a national with a view to being employed otherwise than on his or her own account.
- 1.3.16. Recruitment** – Advertising, information dissemination, selection, transport, placement into employment and return to the country of origin.
- 1.3.17. Country of Origin** – The country that is a source of migratory flows.
- 1.3.18. Country of destination** – The country to which migrant workers are recruited and in which they are employed.
- 1.3.19. Critical Criterion (within IRIS Standard)** – An IRIS audit criterion deemed to be continuously critical for a Labour Recruiter to meet in order to demonstrate commitment to IRIS principles.
- 1.3.20. Non-Critical Criterion (within IRIS Standard)** – An IRIS audit criterion deemed to be not continuously critical for a Labour Recruiter to meet in order to demonstrate commitment to IRIS principles.

#### ***Audit & Certification Related Definitions***

- 1.3.21. Audit Company** – Organization that is accredited (or undergoing accreditation) by the Scheme Manager to manage and conduct audit and certification activities. Accountable to Scheme Manager (and thereby also to Scheme Owner) for meeting certification scheme requirements.
- 1.3.22. Audit** – Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which IRIS Scheme requirements are fulfilled.
- 1.3.23. Audit Team** – one or more persons conducting an audit, supported if needed by technical experts.
- 1.3.24. Audit Team Leader** – Qualified Individual that is appointed by the Audit Company to manage and conduct audit activities. Within this and other IRIS Scheme documents, any activity assigned to the Audit Team Leader may be delegated to other Audit Team Members, however, the Audit Team Leader retains full responsibility for the audit and all related activities.  
*Note: Refer to “IRIS Certification and Audit Protocols” document for full qualification details.*
- 1.3.25. Auditor** – Qualified Individual that is approved by the Audit Company to conduct audit activities supporting an Audit Team Leader.  
*Note: Refer to “IRIS Certification and Audit Protocols” document for full qualification details.*
- 1.3.26. Technical Expert** – Member of audit team assigned to conduct specific interviews and/or review specific audit evidence utilizing his/her specialized skills. Specialized skills may include investigative skills, accounting skills, labour relations skills, labour law skills,

community relations skills, specific safety/health skills, etc. A Technical Expert need not be qualified as an auditor.

- 1.3.27. Audit Program** – totality of activities required to demonstrate that the Labour Recruiter’s management system fulfils the requirements for certification to the IRIS Standard over the certification cycle.
- 1.3.28. Initial Certification Audit** – full-scope management system audit carried out in two stages by an Audit Company independent of the Labour Recruiter and the parties that rely on certification, for the purpose of certifying the Labour Recruiter’s management system.
- 1.3.29. Recertification Audit** – full-scope management system audit conducted by the Audit Company for the purpose of recertifying the Labour Recruiter’s management system. The recertification audit is conducted in manner equivalent to the Initial Certification audit except that the stage 1 and stage 2 evaluation components may be combined into a single on-premises audit process and report.
- 1.3.30. Surveillance Audit** – limited scope management system audit conducted by the Audit Company to evaluate selected elements of the Labour Recruiter’s management system. Surveillance visits may be either announced, or unannounced.
- 1.3.31. Validation sub-audit** – Audit or element of an audit conducted to evaluate evidence of the effectiveness of the Labour Recruiter’s management system gathered from individuals and/or organizations external to the Labour Recruiter organization (workers, employers, employment agencies, Business Partners, sub-agents, etc.). Validation sub-audits may be conducted at the Labour Recruiter’s premises, at premises in the country of origin or receiving country, or remotely via electronic means. Validation sub-audit activities occur during certification, recertification and surveillance audits and may be either announced, or unannounced.
- 1.3.32. IRIS Certification Scope, Profile, and Management Systems Declaration – CSPMS**  
 Documented profile (produced by the Labour Recruiter) documenting Labour Recruiter’s current business activities, relationships, and processes for applying management systems control and monitoring/oversight to promote and assure adherence to IRIS requirements among the organization’s Business Partners.  
 The IRIS Certification Scheme requires the following of the Labour Recruiter with respect to its IRIS Certification Scope, Profile, and Management Systems Declaration:
- Shall be maintained up-to-date at all times, (particularly following changes to the Labour Recruiter’s scope, structure, complexity or geography of its operations, or changes to its management system processes).
  - Shall be made available in its entirety to representatives of the Scheme Manager and Audit Company.
- 1.3.33. IRIS Certification Program Plan** – Documented arrangements (produced by the Audit Company) defining audit and related activities needed to provide adequate assurance of the Labour Recruiter’s management system conformity to the IRIS Standard throughout the certification period.  
 The IRIS Certification Scheme requires the following of the Audit Company with respect to each IRIS Certification Program Plan:
- Shall be maintained up-to-date at all times, (particularly following changes to the Labour Recruiter’s IRIS Certification Scope, Profile, and Management Systems Declaration and, as appropriate, in response to grievances/complaints from interested parties)

- Shall be made available in its entirety to representatives the Scheme Owner, Scheme Manager and Labour Recruiter

**1.3.34. Nonconformity (NC)** – The non-fulfilment of a requirement.

*Note: Nonconformity against a requirement may be determined through the review of available evidence; or through the lack of adequate evidence; or through the absence of evidence, or through some combination of the above. Refer to “Identifying and Recording Audit Findings” in section 4.3 below for details of the various types of nonconformity that may be raised during an IRIS audit.*

**1.3.35. Oversight Audit** – Audit undertaken by, or behalf of, Scheme Manager in support of the IRIS Conformity Monitoring and Integrity Program

**1.4. IRIS Scheme Owner, Normative and Guidance Documents Referenced**

These IRIS General Requirements are designed and developed to adopt and integrate with contemporary global management system certification and audit practices. In particular, unless alternative requirements are specified in these IRIS General Requirements, the following normative and guidance-only reference documents shall be adopted and applied by participants in the IRIS Certification Scheme:

**1.4.1. IRIS Scheme Owner Documents**

- IRIS Standard its consultation and revisions (<https://iris.iom.int/iris-standard>)
- IRIS Logo, Certification Mark & Claims Guide

**1.4.2. Normative Documents**

- ISO/IEC 17021-1:2015 – Conformity assessment -- Requirements for bodies providing audit and certification of management systems -- Part 1: Requirements. (Audit Company)
- ISO/IEC 17011:2017 - Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies (Scheme Manager)
- ILO Definition of Recruitment Fees and Costs ([Link to ILO PDF Page](#))

**1.4.3. Guidance Documents**

- ISO/IEC 17021-3:2017 – Conformity assessment -- Requirements for bodies providing audit and certification of management systems -- Part 3: Competence requirements for auditing and certification of quality management systems.
- ISEAL Assurance Code Requirements – Version 2: 2018
- ISO 19011:2018 – Guidelines for auditing management systems.

*Note1: While the IRIS program largely follows the models outlined in the above documents, deliberate variations, as described in this document, are intentional. Any interested party identifying an unintentional variance between IRIS operational requirements and the normative documents referenced above is requested to bring such details to the attention of the Scheme Manager in writing.*

*Note 2: In some cases, the standard terms used within the international norms and standards listed above may vary from those defined in section 1.3 and used in these General Requirements. The following equivalent terms for organizations participating in the IRIS Scheme should be particularly noted:*



*(17011/General) "Scheme Owner" = "(IRIS) Scheme Owner"*  
*(17011/3.2) "Accreditation Body" = "Scheme Manager"*  
*(17011/3.4) "Conformity Assessment Body" = "Audit Company"*  
*(17021/General) "Certification Body" = "Audit Company"*  
*(17021/3.1) "Certified Client" = "Labour Recruiter" (Certified)*  
*(17021/3.5) "Client" = "Labour Recruiter" (Undergoing an audit)*

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## 2. GOVERNANCE

### 2.1. General

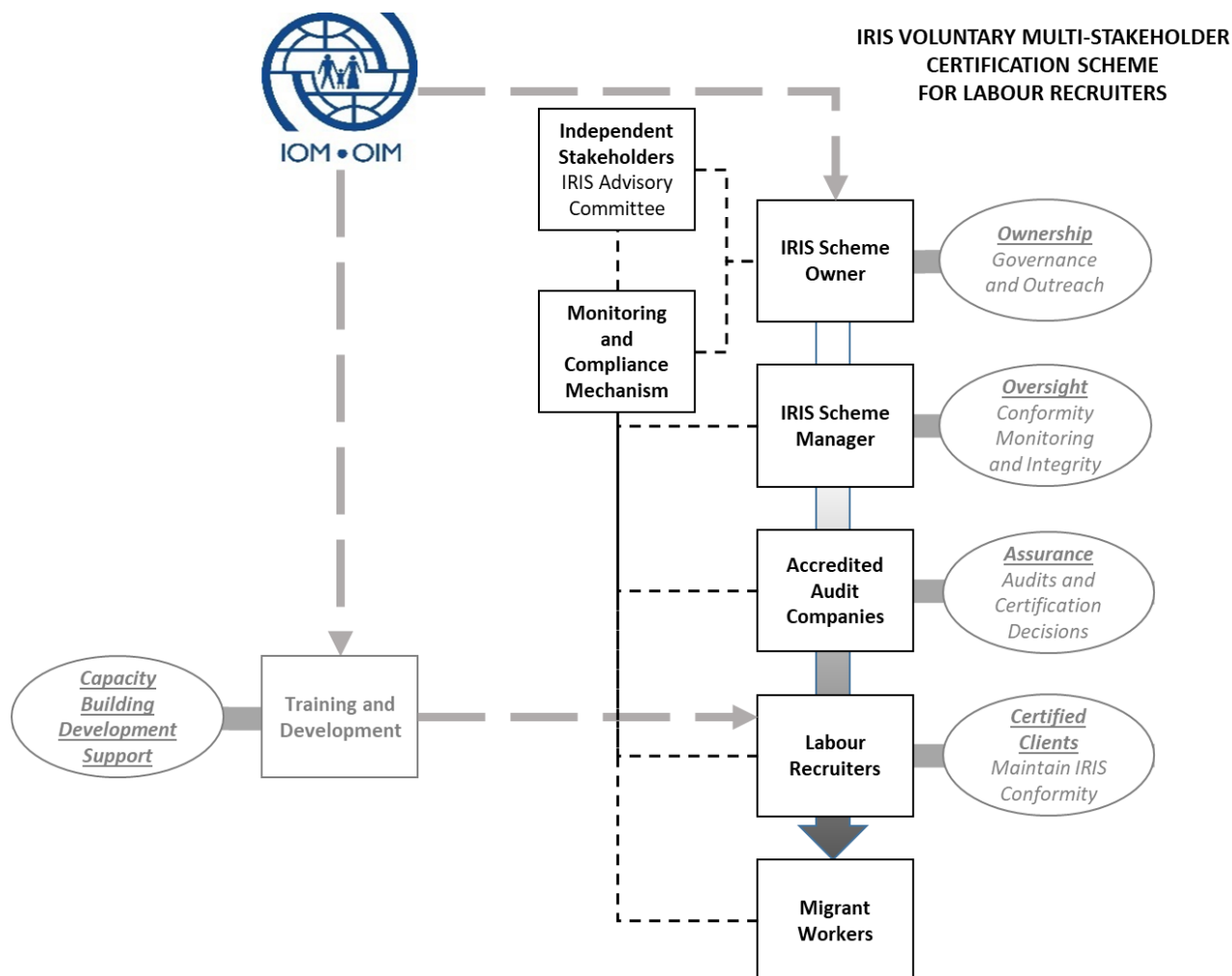
The Scheme Owner is IOM's International Recruitment Integrity System (IRIS) secretariat. As such it is responsible for technical development of the IRIS Standard and overall administration of the IRIS Scheme.

Social Accountability Accreditation Services (SAAS) is appointed as the IRIS Scheme Manager, Registrar and Administrator (Scheme Manager) at the launch of the program.

IRIS Certification is delivered by Audit Companies accredited by the Scheme Manager.

At the discretion of the Scheme Owner and Scheme Manager, IRIS Scheme requirements are continuously reviewed and updated as operational issues demand. Scheme requirements are also formally reviewed and updated in coordination with updates to the IRIS Standard (at least every 5 years).

**Diagram 2.1 IRIS Certification Scheme Governance Structure**



## 2.2. Roles and responsibilities

### 2.2.1. IRIS Scheme Owner:

- Is responsible for development and maintenance of IRIS Scheme Owner Documents (see 1.4, above):
- Is responsible for building of, and revisions to, the certification scheme requirements (jointly with the Scheme Manager)
- Appoints the IRIS Scheme Manager
- Builds Scheme Manager's capacity on IRIS
- Defines, develops, maintains and delivers (jointly with the Scheme Manager) requirements for training of IRIS auditors and others, as required
- Coordinates capacity building activities for Labour Recruiters
- Is responsible for stakeholder engagement and advocacy work

### 2.2.2. IRIS Scheme Manager:

The Scheme Manager is the organization appointed by the Scheme Owner to perform the following functions:

- Defines, develops, publishes, maintains and oversees IRIS Certification Scheme Management and Assurance requirements (in accordance with Scheme Owner expectations)
- Defines, develops, publishes and maintains training and qualification criteria for IRIS auditors and others, as required. (IRIS Certification and Audit Protocols)
- Administers the IRIS Certification Conformity Monitoring and Integrity Program to assure scheme integrity and credibility. This includes monitoring of accredited Audit Companies' processes and outcomes (audits, auditors and certification).
- Maintains records of
  - Accredited Audit Companies
  - Qualified Auditors
  - Certified Labour Recruiters
  - Other Scheme Management processes and results

### 2.2.3. IRIS Scheme Advisory Committee:

IRIS Advisory Committee is created to provide the strategic guidance on implementation, review and directions of the IRISIRIS Standard system, including the IRIS Certification scheme and its rules and standards. The Committee is multi-stakeholder, made up of experts on recruitment and labour migration representatives of private and public sector, civil society as well as representatives of Scheme Owner, Scheme Manager, Audit Companies and social conformity experts. The Committee is governed by the Group Terms of Reference.

### 2.2.4. IRIS Audit Companies:

IRIS Audit Companies are accredited by the Scheme Manager to perform the following functions in accordance with Requirements established by the Scheme Manager:

- Maintain and continuously improve a management system to assure audit and certification quality, integrity, and consistency
- Appoint, manage and evaluate qualified staff and auditors to plan and perform audit and certification of Labour Recruiters (as agreed with the Scheme Manager)
- Review audit reports and make certification decisions

- Submit audit reports and other requested data to the Scheme Manager
- Monitor certified Labour Recruiters' continued performance
- Respond to grievances and complaints from interested parties, as appropriate

#### **2.2.5. Labour Recruiters:**

Labour Recruiters are designated subject of IRIS Certification and in this capacity they

- Prepare for entry into the IRIS scheme by understanding, and committing to, scheme requirements
- Apply to the Scheme Manager to gain recognition within the IRIS scheme
- Contact/ Select an Audit Company to perform audits and certification
- Cooperate with Scheme Manager, Audit Company and Appointed Auditors to plan and conduct certification activities
- Receive IRIS Certification (when conformity is demonstrated)
- Participate in targeted capacity building activities for better improved conformity

### **2.3. Language**

English is the reference language for all Scheme documents. Translations into other languages of Scheme documents may be undertaken at the discretion of the Scheme Management in order for the translation to become official documents. These translations remain the intellectual property of the Scheme.

### **2.4. Scheme documents**

Applicants and certified Labour Recruiters are expected to be aware of the obligations as defined within these General Requirements and have responsibility for ensuring that they are using the most up to date versions of the Scheme documentation. The Scheme Manager maintains these General Requirements and other related scheme documents of the [IRIS Scheme Manager](#) web site. The Audit Company provides information to Applicants and certified Labour Recruiters concerning its processes for audit and certification.

*Note: See Annex 1 for information about publicly available and private documents.*

### **2.5. Confidentiality and Data Protection**

Except as provided for under these General Requirements and associated IRIS scheme documentation, information relating to the Applicant/certified Labour Recruiter, including details of products, services and processes, evaluation reports and associated documentation are treated as confidential (unless otherwise required by law). No confidential information shall be released to third parties without the prior consent of the Labour Recruiter (Applicant or Certificate Holder).

The Scheme Owner shall require conformity by its authorised agents with the requirements of data protection legislation in countries where the Scheme is used and any relevant updates affecting any information held or stored concerning the Scheme members and their activities.

As required to maintain effective system oversight and interested party accountability, the Scheme Owner and Scheme Manager reserve the right to use accumulated data derived from certificate holders and other sources, to produce statistical composite reports for trend analysis.

*Note: See Annex 1 for information about publicly available and private data and information*

### **2.6. IRIS Logo, Certification Mark & Claims**

**(ISO/IEC 17011:2017 Paragraph 4.3 applies)**

- The use of the Scheme Logo and Claims is governed by “IRIS Logo, Certification Mark & Claims Guide”. *(Not yet published 2/2019)*.

There are two IRIS logos: IRIS Scheme Logo and IRIS Certified seal logo.

The use of the IRIS Certified Logo is restricted to current IRIS certified Labour Recruiters who achieve and maintain certification in accordance with these requirements. In such cases the Scheme Logo may be used for business communications. The IRIS Scheme Logo and Claims can also be used by other participants/beneficiaries of the Scheme as defined in the “IRIS Logo, Certification Mark & Claims Guide”. *(Not yet published 2/2019)*

Usage of the IRIS Certified Logo is not transferable to third parties by the certified Labour Recruiter. Usage of IRIS Scheme Logo is also not transferable to third parties by designated user participant/beneficiary.

Failure to comply with the obligations of Scheme Logo usage, shall lead to a temporary suspension, or permanent withdrawal of the IRIS Certificate and thereby the right of use of the Scheme Logo.

The IRIS Certified Logo and the IRIS Scheme Logo are trademarked, shall not be altered in any way and remains the property of the IRIS.

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### **3. APPLICATION FOR CERTIFICATION PROCESS REQUIREMENTS**

**(ISO/IEC 17021-1:2015 Section 8, and Sections 9.1-9.2 Apply)**

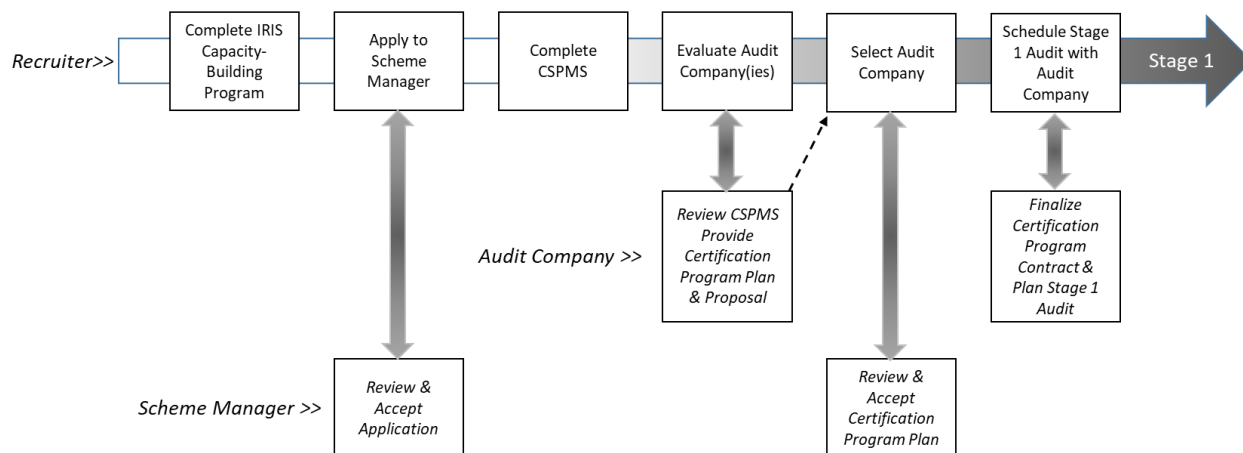
#### **3.1. General**

This section outlines expectations for Labour Recruiter applicants to follow, and requirements for Audit Companies to meet, when processing IRIS Certification applications (and overall Certification Program Planning). Each Audit Company shall adhere to the audit process requirements of ISO/IEC 17021-1:2015 except as otherwise specified below.

In addition to the broad requirements outlined below, Audit Company personnel must refer to the supplemental document, “IRIS Certification and Audit Protocols” to fully understand and meet detailed IRIS scheme requirements.

#### ***Diagram 3.1 – IRIS Certification Application Process Outline***

### IRIS Certification Application Process Outline



## 3.2. Self-Assessment and Preparation

In order to pursue IRIS Certification, it is essential that the Labour Recruiter’s management fully understands its (demonstrable technical and management systems performance) obligations under the scheme. Before proceeding with an application, the Labour Recruiter shall have successfully completed an approved IRIS Capacity Building Program. When the Labour Recruiter is deemed ready by the IRIS Scheme Owner, it may apply for IRIS Certification. An ‘IRIS Toolkit’ and details of IRIS-approved training and Capacity Building may be accessed via the [IRIS web site](#).

## 3.3. Eligibility, Scope and Application

### 3.3.1. Eligibility

To be eligible for IRIS Certification a Labour Recruiter must be a private (nongovernmental) entity possessing a valid licence (or other valid authorisation) to perform labour recruitment activities issued by, and in good standing with, the appropriate legal authority[ies] (i.e. no suspensions, withdrawals). The Labour Recruiter must also abide by the scheme’s certification scope requirements.

### 3.3.2. Certification Scope Requirements

In all cases, the scope of certification shall refer to a single\* legal entity, which has

- overarching management control to implement and oversee a common, harmonized management system across the entire reach of its operations (including the collection and analysis of data),
- the authority and ability to implement organisational change within the organisation and influence process improvements across the entire reach of its operations

The entirety of the labour recruitment operations of the single legal entity must be included within the scope of certification (i.e. limitation of certification scope in any way – such as the exclusion of a country of origin, or receiving country, category of worker or business partner) is not permitted:

- The scope of certification must cover all personnel associated with the Labour Recruiter whose work may impact conformity to the IRIS Standard.
- Although verification of Labour Recruiter's management and oversight of Business Partners, agents, clients (migrant workers and employer organisations) is required during the IRIS Certification process, these entities are not considered to be part of the certification and shall make no IRIS Certification-related claims.

The IRIS scheme recognizes that the scope of each Labour Recruiter's operations is different and is subject to variations throughout the certification period. In general, however, the scope of a Labour Recruiter's operations will consist of:

- One or number of Labour Recruiter's sites;
- One or number of Employer sites
- One or number of Business Partners sites
- One or number of migrant workers' sites

*\*Note: Wholly owned affiliate company (offices) under the central control of one legal entity may be considered and addressed under the proposed scope of certification.*

### **3.3.3. Application Process**

The Labour Recruiter seeking IRIS Certification obtains application information from the [IRIS Scheme Manager](#) web site. The application starts with submitting the "IRIS Certification – Initial Application for Recruiters" workbook to the Scheme Manager together with the applicable application fee. This application is non-binding and a Labour Recruiter may subsequently choose to withdraw from the process.

The application requires submission of Labour Recruiter organisational details (including details of the scale of its business and countries of operation). By registering for certification, the Labour Recruiter Applicant confirms it has accessed, understood and agrees to comply with the Scheme General Requirements and that employers, agents and other Business Partners will be consulted and will be required to cooperate and participate in the certification process as requested.

Following review and acceptance of the application, the Labour Recruiter becomes an Applicant. The Scheme Manager:

- confirms acceptance of application
- issues the Applicant a Labour Recruiter Number (LRN)
- publishes Applicant information on the [IRIS Scheme Manager](#) web site.

Unless the Labour Recruiter completes the initial certification process within 18 months of acceptance of the application, the application and LRN becomes invalid, (requiring a resubmission of application data, self-assessment results and fees).

### **3.4. Audit Company Selection**

Audit Companies accredited by the Scheme Manager are listed on the [IRIS Scheme Manager](#) web site indicating that the organisation has the technical capability and quality systems infrastructure required to undertake audits and certification in a professional and independent manner for a defined geographical scope of operation.

The Applicant shares initial application details with and selects one (or more than one) suitably accredited Audit Company to provide a proposed Certification Program Plan and associated budget.

### **3.5. Certification Program Planning**

The purpose of the certification program planning stage is for the Applicant and the Audit Company to define and agree the proposed arrangements for an audit program through the certification period.

#### **3.5.1. IRIS Certification Scope, Profile, and Management Systems Declaration\* (CSPMS)**

The Applicant is required to complete an IRIS Certification Scope, Profile, and Management Systems Declaration\* (CSPMS) and submit this by electronic means to the Audit Company prior to Certification Program Planning discussions.

*\*Note: The Labour Recruiter is subsequently required to maintain this document up-to-date throughout the application and certification period.*

#### **3.5.2. Certification Program Planning Details**

The Audit Company shall base audit program planning and routine surveillance monitoring through the certification period in accordance with the outline below:

- Audit company receives fully completed details of operations (“IRIS Certification Scope, Profile, and Management Systems” - CSPMS and “Labour Recruiter Self-Declaration” - Self-declaration tool)
- Initial (two-stage) Certification Audit process and follow-up\*
- IRIS Certification granted when all requirements met (see section below)
- First Surveillance audit six months after the granting of IRIS Certification (+/-1 month)
- Second Surveillance audit 12 months after the granting of IRIS Certification (+/-1 month)
- Recertification (two stage) audit within 24 months of the granting of IRIS Certification

Thereafter

- One Surveillance occurs per certification period on a 12 month cycle (+/-1 month)
- Recertification audits occur within consecutive 24 month cycles

The audit approach and effort required varies depending on nature of each Labour Recruiter’s operations. In accordance with requirements and guidance provided in the [IRIS Certification and Audit Protocols](#) document, the certification plan, any subsequent adjustments shall consider **risks and controls related to** the size of the Labour Recruiter, the scope, structure, complexity, and geography of its operations; **its management system processes and their demonstrated level of effectiveness including**, where appropriate, the results of any previous audits.

*\* Note: The stage 2 audit shall not be planned until such time as any issues relating to incomplete, out-of-date, inconsistent, ambiguous or otherwise misleading information have been resolved.*

#### **3.5.3. Application Review and Certification Program Plan**

Following acceptance and evaluation of the IRIS Certification Scope, Profile, and Management Systems (CSPMS) declaration and any necessary follow-up with the Labour Recruiter, a



“Registered IRIS Audit Team Leader”\* shall (develop and) approve an IRIS Certification Program Plan on behalf of the Audit Company. Based upon information provided by the Applicant in the CSPMS Declaration and the nature of the risks envisioned, the Audit Team Leader develops an IRIS Certification Program Plan to define the proposed audit program in accordance with scheme requirements above and the [IRIS Certification and Audit Protocols](#) document, (i.e. determining the overall number and type of sites to visit and other audit information gathering activities to be conducted throughout the two year certification period). The proposed plan shall address all anticipated work to be undertaken by the Audit Company, including, pre-audit planning and post-audit follow-up (including arrangements for the follow-up, evaluation and closure of nonconformities at each stage of the certification cycle) and shall be adequate to ensure audit work can be reasonably completed to acceptable standards within the time allowed.

The proposed IRIS Certification Program Plan shall address the following issues (as a minimum):

- Confirmation that Audit Company has reviewed, discussed and accepted the adequacy of the IRIS Certification Scope, Profile, and Management Systems Declaration (updated and amended by the Labour Recruiter, as necessary) and that the information was sufficient for the Audit Company to prepare an IRIS Certification Program Plan and budget (including costs breakdown)
- Confirmation of the number of recruiter’s, employers’, Business Partners’ sites and workers for the Audit Company to visit and/or evaluate is defined and work effort calculated in accordance with the sampling protocol and other scheme requirements in the **“IRIS Certification and Audit Protocols” document.**
- **Outline for and** confirmation of preliminary\*\* planned arrangements for all Audit Company activities – **including off-site and VSA sampling/activities** (see sections below) throughout the certification cycle.
- **Outline for and** confirmation of arrangements for additional contingency work effort which **is anticipated** through the certification period, including:
  - Follow-up of audit nonconformities
  - Changes to the Labour Recruiter scope of operations
  - Management and investigation of incidents/ grievances/ concerns/ complaints received from any source concerning the Labour Recruiter’s operations (including upstream and downstream operations)
- **Outline for, and confirmation of, the existing and anticipated human resource needs (Auditors, specialists, translators and others) anticipated at each stage of the certification cycle.**
- Confirmation that the Labour Recruiter has declared that its employer clients, agents and other Business Partners have been informed about its application for IRIS Certification.\*\*\*
- **Any assumptions/limitations made and incorporated.**

At this stage, the Audit Company also provides a budget estimate of costs for the certification period to the Labour Recruiter.

*\* Note: Refer to the current version of “IRIS Certification and Audit Protocols” document for the current definition of “Registered IRIS Audit Team Leader”.*

*\*\*Note: It is anticipated that throughout the certification cycle, changes to the Labour Recruiter's scope of business will result in ongoing modifications to the IRIS Certification Scope, Profile, and Management Systems Declaration and, as a result, ongoing modifications to the IRIS Certification Program Plan.*

*\*\*\*Note: No Business Partner may be deliberately excluded from the Labour Recruiter's IRIS-compliant management system controls. The Audit Company and Labour Recruiter are expected to work cooperatively to develop representative and credible Business Partner sampling arrangements to provide the required level of assurance. If (during subsequently planned audits or monitoring activities) Audit Company or Scheme Manager personnel are denied prompt and reasonable access to Business Partner's premises, personnel or records needed to verify IRIS conformity, additional fees may be applied and/or the Labour Recruiter's certification may be withheld, or suspended.*

### **3.5.4. Certification Program Plan Approval**

The Labour Recruiter reviews IRIS Certification Program Plan (and associated estimate of certification costs) from Audit Company(ies)\*. The Labour Recruiter selects a single plan and submits this together with its current IRIS Certification Scope, Profile, and Management Systems (CSPMS) declaration to the Scheme Manager for review and acceptance. Taking into account the Labour Recruiter's IRIS Certification Scope, Profile, and Management Systems Declaration, the Scheme Manager reviews the proposed IRIS Certification Program Plan against scheme requirements and electronically notifies Labour Recruiter and the Audit Company of acceptance or rejection of the plan within ten working days of receipt. If rejected\*, the Scheme Manager shall outline the reasons for rejection, requiring a revised submission from the Labour Recruiter (and its chosen Audit Company).

*\* Note: Should the first plan be rejected by the Scheme Manager, or should Labour Recruiter choose to work with more than one Audit Company, additional application fees shall be due to the Scheme Manager (in advance) for each IRIS Certification Program Plan(s) to be reviewed.*

## **3.6. Certification Contract**

Upon confirmation of the Scheme Manager's acceptance of the IRIS Certification Program Plan, the Audit Company and Labour Recruiter shall establish a written contractual arrangement (including associated commercial fees) based upon that plan. Certification contracts shall include the following provisions:

### **3.6.1. Business Partner Commitment**

In a section outlining the representations and warranties of the Labour Recruiter:

- "Labour Recruiter has engaged appropriately with employers, agents and other Business Partners regarding their possible involvement with the certification process. Notified Business Partners are aware of IRIS requirements and the possibility of involvement in verification sub-audit activities. Upon selection by audit team, Labour Recruiter will coordinate with identified Business Partners regarding sub-audit activities and expectations."

### **3.6.2. Sharing of Data**

In a section outlining the representations and warranties of the Labour Recruiter:

- “Labour Recruiter agrees to share data with AC, Scheme Owner, and Scheme Manager in accordance with IRIS scheme requirements. It is understood that limited or aggregated data may be made public or shared with third parties as outlined in Section 2.5 and Annex 1 of the IRIS Scheme General Requirements.”
- “Labor Recruiter agrees to maintain its IRIS Certification Scope, Profile, and Management Systems Declaration (CSPMS) up-to-date and to provide AC, Scheme Owner, or Scheme Manager an up-to-date version within 72 hours of any written request.”

#### **3.6.3. Maintenance of Legal Status**

In a section outlining the representations and warranties of the Labour Recruiter:

- “Labour Recruiter agrees to notify *[Audit Company]* within 24 hours in the event of loss of operating license or legal proceeding related to unethical recruitment practice. (IRIS Standard Criterion A.1 refers)”.

#### **3.6.4. Right of Access**

In a section outlining the representations and warranties of the Labour Recruiter:

- “Labour Recruiter agrees to provide and/or facilitate *[Audit Company]*, IRIS Scheme Manager, IRIS Scheme Owner, and their authorized appointees reasonable in-person and/or electronic access to all evidence required for the purposes of initial IRIS Certification, surveillance, recertification, resolution of complaints, and other IRIS scheme related activities.”

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## **4. AUDIT PROCESS REQUIREMENTS**

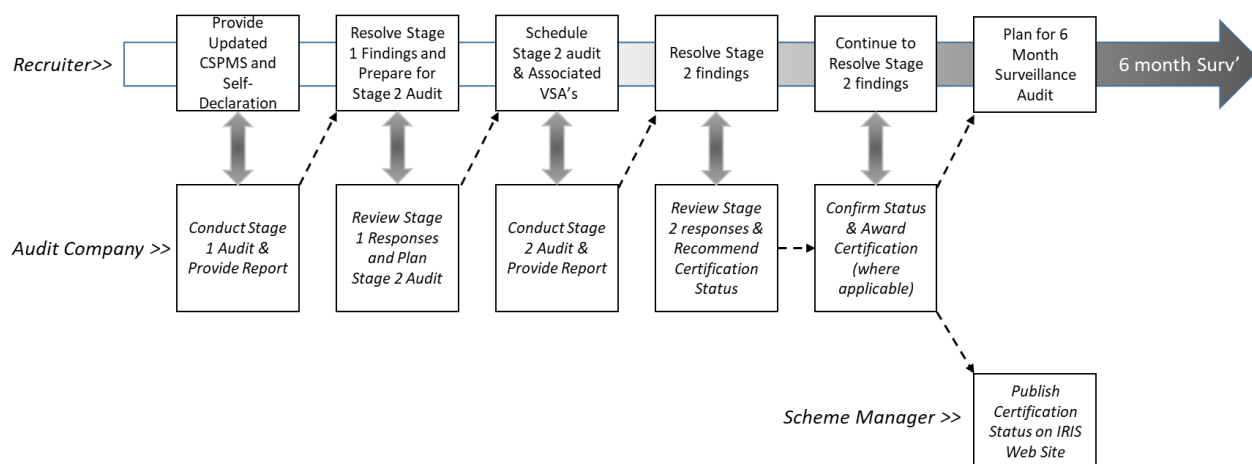
**(ISO/IEC 17021-1:2015 Sections 9.2, 9.3, 9.4 Apply)**

This section outlines the process requirements for the various types of audit undertaken by Audit Companies. Both general requirements and audit type-specific requirements are addressed. Each Audit Company shall adhere to the audit process requirements of ISO/IEC 17021-1:2015 except as otherwise specified below.

In addition to the broad requirements outlined below, Audit Company personnel must refer to the supplemental document, “IRIS Certification and Audit Protocols” to fully understand and meet detailed IRIS scheme requirements.

**Diagram 4.1 – IRIS Initial Certification Audit Process Outline**

*IRIS Initial Certification Audit Process Outline*



#### 4.1. Initial Certification Audit – General Requirements

Each Audit Company shall adhere to the audit process requirements of ISO/IEC 17021-1:2015 section 9.3, except as otherwise specified below.

##### 4.1.1. Initial Certification Audit

##### (ISO/IEC 17021-1:2015 sections 9.2 & 9.3.1 apply)

The initial certification audit shall follow the protocol defined in these General Requirements (and associated documentation) and shall be conducted in two stages: stage 1 and stage 2. Validation sub-audits (see below) shall be a part of every stage 2 Certification Audit.

##### 4.1.1.1. Stage 1 (ISO/IEC 17021-1:2015 section 9.3.1.2 applies)

The broad purpose of the stage 1 audit is for the Audit Company to determine the Applicant's readiness to undergo, and to provide a planning focus for, the stage 2 audit by reviewing the applicant's organisational structure, policies, procedures practices and documentation relating to all topics in scope.

Subject to the mutual agreement of the Audit Company and the Applicant (and in accordance with the agreed IRIS Certification Program Plan) the stage 1 audit may be conducted at the Applicant's premises, or remotely.

The selected Audit Company provides Applicant information concerning the Stage 1 process and assigns a suitably competent and qualified Audit Team Leader. When the stage 1 audit is to be conducted on-site, Audit Company shall also provide Applicant with an audit plan detailing the planned activities for the visit.

Applicant completes the IRIS Audit Tool's "Labour Recruiter Self-Declaration" section by listing the various policies, operating procedures and other management system controls applied to address each requirement of the IRIS Standard. On completion, applicant submits the following documentation to the selected Audit Company to form the basis for the stage 1 audit evaluation:

- IRIS Audit Tool (with completed “Labour Recruiter Self-Declaration” section)
- Up-to-date IRIS Certification Scope, Profile, and Management Systems Declaration\* (CSPMS)
- Principal Applicant policies, operating procedures and other documentation (as referenced in Audit Tool, above)
- Additional documentation as may be required by the Audit Company’s requirements

Following receipt, Audit Company’s designated Audit Team Leader reviews and evaluates submitted documentation for completeness in accordance with current IRIS audit criteria (as specified herein, in the “IRIS Certification and Audit Protocols” document, and as specified within Audit Company’s requirements).

Stage 1 Audit findings shall be provided to the Applicant management both verbally (via electronic means, if necessary) and in the form of a stage 1 audit report. To allow adequate time for responses and further evaluation which may be needed, the stage 2 audit dates and arrangements shall not be established until such time as the stage 1 audit has been completed and outstanding issues resolved to the satisfaction of the assigned Audit Team Leader, (including verification that all CSPMS and self-declaration details have been provided and evaluated for credibility).

Should the required period between stage 1 and stage 2 audits exceed 120 days, the audit company shall repeat the stage 1 audit to ensure up-to-date information is available and the stage 2 audit team is fully briefed. (Additional charges may apply.)

#### **4.1.1.2. Stage 2 Audit (ISO/IEC 17021-1:2015 section 9.2 & 9.3.1.3 apply)**

The broad purpose of the stage 2 audit is for the Audit Company to evaluate the implementation, including effectiveness, of the Applicant’s management system. The stage 2 audit shall be conducted at the Applicant’s premises, supported as needed by the evaluation of audit evidence collected through validation sub-audits and remote evaluation activities in accordance with the IRIS Certification Program Plan.

The selected Audit Company provides Applicant with information concerning the Stage 2 process. During the stage 2 audit, the Audit Company evaluates the demonstrable effectiveness of the entirety of the Applicant’s management system in achieving conformity to the IRIS Standard, including related statutory, regulatory, contractual and other requirements.

The Audit Team Leader evaluates all information and audit evidence gathered to determine audit findings and conclusions, which are provided to the Applicant during a closing meeting, and in the form of a stage 2 audit report. The stage 2 audit report also contains the Audit Team Leader certification recommendations to the Audit Company’s certification decision-making process. Resolution of nonconformity issues through effective corrective action (see section below), may occur. Following acceptance of corrective actions, the Audit Team Leader may amend his/her certification recommendation.

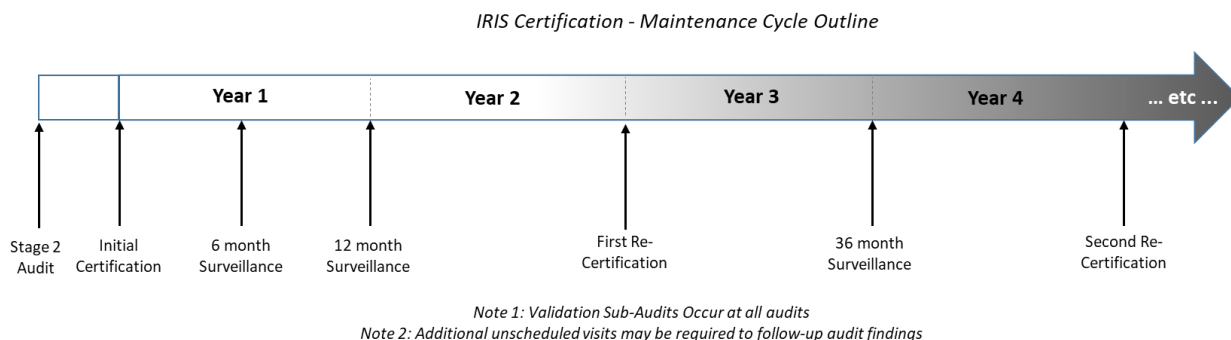
## **4.2. Maintaining Certification – General Requirements**

**(ISO/IEC 17021-1:2015 sections 9.2 & 9.6 apply)**

Audit Company shall maintain certification based on continuing demonstration that Labour Recruiter continues to satisfy the requirements of the IRIS Standard.

The Audit Company shall adhere to the audit process requirements of ISO/IEC 17021-1:2015 except as otherwise specified below.

**Diagram 4.2a – IRIS Certification – Maintenance Cycle Outline**



**4.2.1. Surveillance Activities**

**(ISO/IEC 17021-1:2015 sections 9.2 & 9.6.2 apply)**

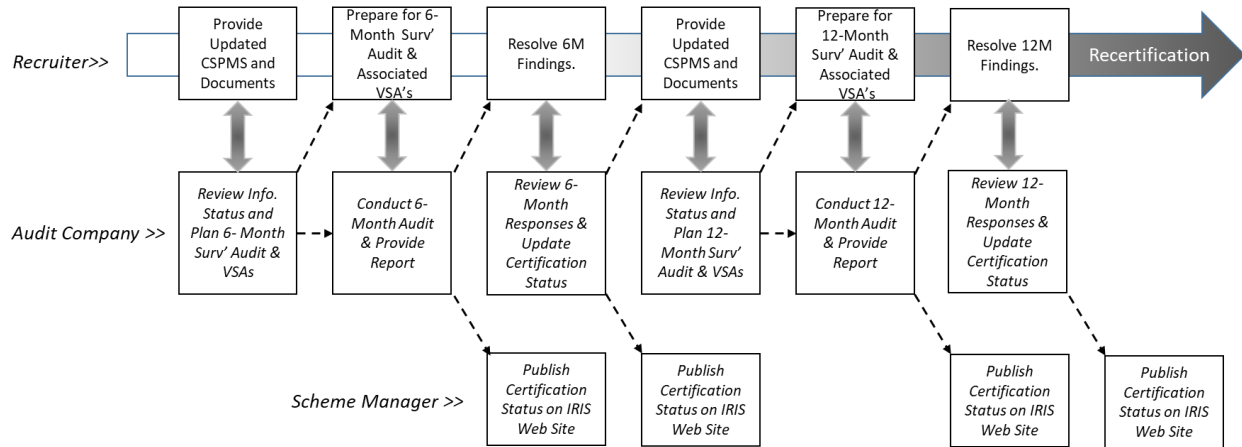
Surveillance Activities shall follow ISO/IEC 17021-1: 2015 section 9.6.2. The purpose of a surveillance audit is to maintain confidence that the client's certified management system continues to fulfil requirements between recertification audits. Surveillance audit visits to the Labour Recruiter's premises shall occur once during each two-year IRIS Certification period within one month of the one-year anniversary of certification/recertification. An additional surveillance audit is conducted six months after initial certification only.

In addition to the mandatory requirements of ISO/IEC 17021-1: 2015 section 9.6.2, the following shall be a part of every IRIS Surveillance Audit

- Research of stakeholder (e.g. NGOs and CSOs) and other information to identify regional and/or company-specific issues requiring particular attention
- Validation sub-audits (see below).

**Diagram 4.2b – IRIS Surveillance Process Outline**

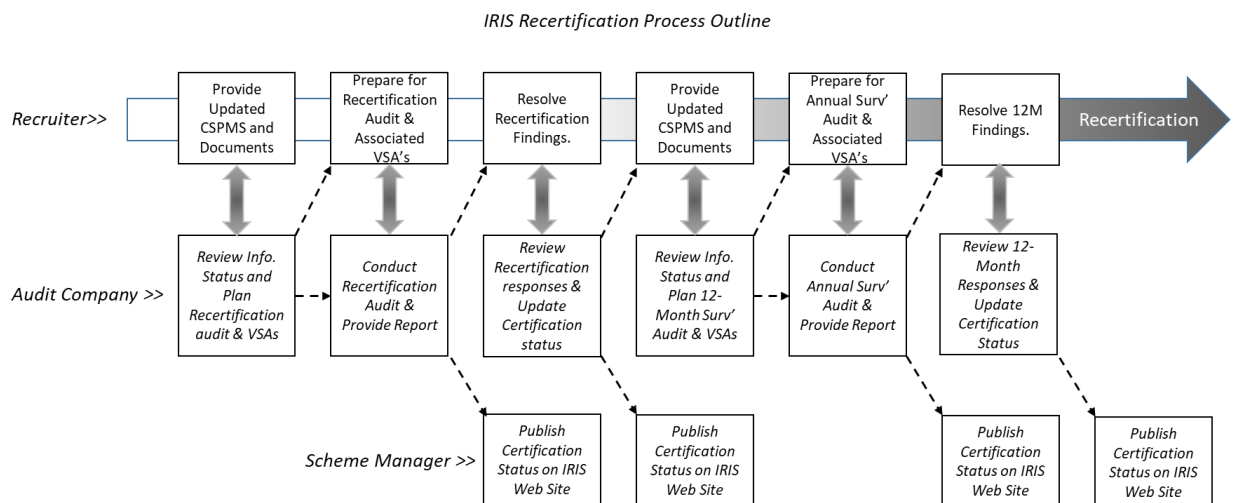
IRIS Surveillance Audit Process Outline (1<sup>st</sup> Certification Cycle)



#### 4.2.2. Recertification Audit (ISO/IEC 17021-1:2015 sections 9.2 & 9.6.3 apply)

The recertification audit shall follow the protocol defined in these General Requirements (and associated documentation) and shall be conducted in two stages: stage 1 and stage 2 in sufficient time to allow for any corrective actions to be completed prior to the recertification date twenty-four months after granting of prior certification/ recertification. Both stages shall follow process requirements equivalent to those applicable for the Initial Certification Audit (see above), except that (unless circumstances demand a different approach) both stages are typically conducted contiguously as a single site visit to the Labour Recruiter's premises. Validation sub-audits (see below) shall be a part of every Recertification Audit.

Diagram 4.2c – IRIS Recertification Process Outline



#### 4.2.3. Special Audits

**(ISO/IEC 17021-1:2015 sections 9.6.4 applies)**

The Audit Company may, from time to time, undertake special audits in response to

- changes to a Labour Recruiter's scope of operations; or
- a complaint/concern from an interested party regarding a certified Labour Recruiter; or
- a request from the IRIS Scheme Manager

The Audit Company shall adhere to its own protocols and the requirements of ISO/IEC 17021-1:2015 when undertaking special audits.

**4.3. Audit Processes – All Audit Types****(ISO/IEC 17021-1:2015 section 9.4 applies)**

The Audit Company performs IRIS audits in a sequence and manner equivalent to any other management system audit:

- Audit Planning and Preparation
- Audit Conduct
  - Opening Meeting (Typically conducted at the Labour Recruiter's Premises, but may be conducted remotely, where appropriate)
  - Audit conduct (obtaining and verifying information, including review of management systems at the Labour Recruiter's premises and validation sub-audit activities as specified in the current version of the IRIS Certification Program Plan)
  - Identifying and Recording Audit Findings
  - Preparing Audit Conclusions
  - Closing Meeting
- Audit Reporting and Reporting Considerations
- Review of Nonconformities, Corrections and Corrective actions

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply to Initial Certification Stage 2 Audits, Surveillance Audits and Recertification Audits (Unless otherwise stated):

**4.3.1. Audit Planning and Performance****4.3.1.1. General and Planning**

This document in general, and the following paragraphs in particular, use the general term 'audit team leader'. An audit team leader may be either a "Registered IRIS Audit Team Leader"\* or a "Registered IRIS Auditor" under the training and direct supervision of a Registered IRIS Audit Team Leader. Audit Company shall ensure that assigned audit team leader is changed/rotated after four consecutive audits as team leader.

*\* Note: Refer to the current version of "IRIS Certification and Audit Protocols" document for the current definition of "Registered IRIS Audit Team Leader" and "Registered IRIS Auditor".*

Each scheduled IRIS audit comprises not only audits at the Labour Recruiter's premises, but also various validation sub-audits and related verification activities, which may not take place at the Labour Recruiter's premises.



In preparation for each audit, Audit Team Leader shall access information regarding Labour Recruiter's Practices from available sources, including, but not limited to:

- Prior audit reports nonconformity responses, etc.
- Complaint information (Audit Company and IRIS Scheme Sources including IRIS Monitoring and Compliance Mechanism MCM).
- [RecruitmentAdvisor.org](https://RecruitmentAdvisor.org).
- Labour Recruiter Website, recruitment association website(s), employer websites
- Other relevant and readily identifiable web resources

Audit Team Leader shall also solicit relevant information from local NGO's, CSO's, Trade Union's etc. in countries of origin and countries of destination.

In addition to the above, planning for each audit shall consider the risks and current operations of the Labour Recruiter and shall conform to the requirements and guidance contained within the "IRIS Certification and Audit Protocols" document.

In addition to ISO/IEC 17021-1 requirements, each audit shall comprise, as a minimum:

#### **4.3.1.2. Opening Meeting**

In addition to ISO/IEC 17021-1 requirements, Audit Team Leader shall:

- Confirm that the audit team has the current version of the IRIS Certification Scope, Profile, and Management Systems Declaration
- Confirm the IRIS Certification Program Plan is up to date and that labour recruitment representatives have access to the current version
- Confirm that the audit team and the labour recruiter representatives have current version of Audit Tool with most updated Labour Recruiter Self-Declaration section which is based on the most recent version of the IRIS Standard and indicators
- Confirm when and how validation sub-audit activities are to take place
  - Who, what how, when, where? (per IRIS Certification Program Plan, and IRIS Certification Scope, Profile, and Management Systems Declaration, as updated)
  - Individual employer and site Labour Recruiter representatives [if any] to be contacted. Dates and times for validation sub-audit activities (if not unannounced).
  - Where logistical arrangements allow, the exact date and time of the validation sub-audit activities should not be divulged to auditees until shortly before the activities are to occur.
- Confirm worker interview arrangements and details:
  - the broad nature of the worker interview process and the worker selection process
  - that interviews are confidential
- Review, confirm and record any adjustments that may be needed to the IRIS Certification Scope, Profile, and Management Systems Declaration and/or the IRIS Certification Program Plan in respect of both current and future audit activities.
- Obtain Labour Recruiter's documented authorization to conduct agreed validation sub-audit activities (in a format that can be shared with and clearly understood by personnel to be contacted)

- Confirm communication lines and messaging with employers and Business Partners related to validation sub audits
- Confirm arrangements for the closing meeting

#### **4.3.1.3. Audit Conduct (Obtaining and verifying information, and communications)**

In addition to meeting ISO/IEC 17021-1 paragraph 9.4.4 requirements, the assigned Audit Team evaluates the Labour Recruiter's management system using the IRIS Audit Tool to determine the extent to which the Labour Recruiter is able to demonstrate conformity to indicators mapped to the IRIS Standard.

##### **4.3.1.3.1. Validation Sub-Audit Arrangements (Business partner evidence evaluations)**

The Audit Team conducts validation sub-audit activities in accordance with the IRIS Certification Program Plan (as updated).

- Validation sub-audit activities include interviews with Labour Recruiter clients (employers and migrant workers deployed by the Labour Recruiter), and business partners (as appropriate to the situation and in accordance with the Certification Program Plan).
- The purpose of validation sub-audit activities with Labour Recruiter's partners and clients is to prepare for, or validate, elements the Labour Recruiter's on-site audit through triangulation of audit evidence.
- Validation sub-audit activities are conducted based on a defined sample and can be conducted remotely or on-site and may be conducted before or after an audit visit to the Labour Recruiter's premises.

After gathering evidence from validation sub-audit activities, the Audit Team shall (as necessary) conduct face-to-face or electronic dialogue with the Labour Recruiter to:

- Cross-check points raised through the validation sub-audit activities and interviews
- Access and review any information that required specific permission from workers
- Question a potential nonconformity
- Further access and review evidence at the Labour Recruiter Head Office or other locations.

*Note: Validation sub-audit requirements are further detailed in the "IRIS Certification and Audit Protocols" document.*

#### **4.3.1.4. Identifying and Recording Audit Findings**

In addition to ISO/IEC 17021-1 paragraph 9.4.6 requirements, audit findings are determined and recorded using weighting algorithms embedded within the IRIS Audit Tool.

Audit Team Leader evaluates the Labour Recruiter's demonstrated level of conformity with the IRIS Standard using the IRIS (control point) indicators and related sub-indicators

specified within the IRIS Audit Tool. All required (pale yellow) fields in all 'Principle' data collection sheets must be completed during initial certification and recertification audits. The audit company's certification plan may permit auditors to omit certain indicators during surveillance audits (recording those indicators omitted by using the "Included This Audit?" pull-down option). All indicators of Principle B1 are applicable on every audit.

**4.3.1.4.1. Audit Findings for 'Performance' Principles/Criteria A, B2, B3, and 1-5**  
Depending on the evidence demonstrated, the Audit Team Leader awards a Conformity Status ('Yes', 'No', or 'Partially',) to each individual performance sub-indicator. Using embedded algorithms, the audit tool compiles the audit team's sub-indicator responses into a Conformity Result for each indicator (shown on the Audit Tool's 'Results Summary' page as well as on the applicable 'Principle' page.

Each rating of 'No', or 'Partially' shall be the subject of a nonconformity finding. Taking into consideration that each indicator has been assigned a weighting (embedded within the Audit Tool) as follows ...

- Critical
- Non-Critical (Normal)

... the Audit Team Leader raises a nonconformity (one of three types) as follows:

- Major
- Minor

(see also rating criteria for different 'Nonconformity' categories - below)

**4.3.1.4.2. Audit Findings for 'Management System' Principle/Criteria B1**  
Depending on the evidence demonstrated, the Audit Team Leader awards a Management System Maturity Rating (0-3 – refer to 'MS Rating System Structure' tab within the Audit Tool for guidance) to each management system sub-indicator. Using embedded algorithms, the audit tool compiles the auditor team's sub-indicator responses into an overall performance rating for each Principle B.1 indicator (shown on the Audit Tool's 'Results Summary' page as well as on the applicable 'Principle' page.

Each indicator-level management system maturity rating of 0 shall be the subject of a **Major Nonconformity** finding (see also Nonconformity criteria below).

Each indicator-level management system maturity rating of 1 shall be the subject of a Management System Improvement Opportunity (MSIO) finding (see also MSIO criteria below).

The percentage aggregate Management System Maturity score (of B.1.1 – B.1.9) is also used to determine the Labour Recruiter's eligibility for achieve or maintain certification (See table 4.3.1 below for further details).

**4.3.1.4.3. ALERT Nonconformity Findings**

Raised only in the case of evidence of grievous breach of IRIS principles, ethical standards, or scheme requirements including but not limited to:

- misrepresentation of the Labour Recruiter's certification status, operational scale, scope, or contractual relationships.

- lack of notification of relevant past and pending legal actions involving the Labour Recruiter or its services.
- absence of commitment to, or systemic failure of, Labour Recruiter to facilitate adequate access to Business Partner evidence for the purpose of validation sub-audits.
- absence of understanding of, or absence of commitment to, applicable laws, regulations, or other applicable operational commitments (e.g. bilateral or contractual agreements).
- deliberate falsification of documents and/or withholding/misrepresentation of information to Audit Company, Scheme Manager, or other authority.
- bribery, threats or coercion (any sort, any party), or other actions that may be deemed to significantly impact the credibility of the Labour Recruiter's certification status.
- grievous and intentional violations of workers' rights.

When the audit team identifies an "Alert" situation, the Audit Team Leader shall immediately:

- raise a nonconformity upon observing the violation.
- report the matter to Labour Recruiter senior management.
- notify the Audit Company's IRIS Certification Manager and the Scheme Manager
- contact Audit Company's IRIS Certification Manager to seek advice as to whether the audit should be aborted or continued. (Loss of audit revenue shall not be a valid reason to abort or not abort an audit).

#### **4.3.1.4.4. MAJOR Nonconformity Findings**

Raised in the case of:

- Failure of the Labour Recruiter to effectively demonstrate (wholly, or partially) conformity to the requirements any critical criterion; or
- The absence or total breakdown of a system/controls required to meet any non-critical criterion.
- A Management System Maturity Rating of '0' for any B.1 indicator
- A minor nonconformity that has not been addressed, or for which no significant improvement has been made by the time of a follow-up evaluation.

#### **4.3.1.4.5. MINOR Nonconformity Findings**

Raised when audit evidence (or lack of evidence) does not meet the above thresholds for an alert nonconformity, or a major nonconformity. A MINOR nonconformity records:

- Failure of the Labour Recruiter to effectively demonstrate (wholly, or partially) conformity to the requirements of any non-critical criterion. (Typically, an Individual, isolated, lapse/failure in operations that does not affect the Labour Recruiter's overall capability or performance in meeting any non-critical criterion).
- Inappropriate use of the IRIS name or scheme mark that does not constitute 'misrepresentation' (see 'ALERT Nonconformity Findings' above).

#### 4.3.1.4.6. Management System Improvement Opportunity (MSIO) Findings (Applicable for IRIS Standard Section B.1 ONLY)

Raised when audit results assign a consolidated ‘management system maturity score’ of 1 against any Management System (IRIS Standard Section B.1) Indicator. (i.e. audit evidence indicates that the Labour Recruiter’s management system performance may be substantially improved in a particular area).

*Note/Further Explanation: MSIOs are used to record identified management system (B.1) weaknesses which, if left unaddressed, could lead to deterioration of IRIS performance in other areas. MSIOs themselves are not considered by an audit team in determining whether to recommend a Labour Recruiter for certification (or continuation of certification). No specific action is required of the Labour Recruiter to address an MSIO, however, during future audits, AC auditors will evaluate the Labour Recruiter’s response to the MSIOs to determine the extent to which the Labour Recruiter demonstrates commitment to continual improvement (IRIS Criterion B1.8).*

#### 4.3.1.5. Nonconformities not under the direct control of the Labour Recruiter

Nonconformities, or aspects of nonconformities, that are not under the direct control of the Labour Recruiter, but relate to responsibilities of the employer or other Business Partner (for example, health and safety compliance in the workplace or pay rates dictated by the employer) shall be recorded as a part of a management system nonconformity raised against the Labour Recruiter (and the requirements of the IRIS Standard) – i.e. discrete evidence gathered from a Business Partner shall be used to illustrate the Labour Recruiter’s non-fulfilment of an IRIS management system requirement, rather than being recorded as a discrete failure of the Business Partner to meet any specific requirement (e.g. a legal obligation).

#### 4.3.1.6. Audit Conclusions

In addition to ISO/IEC 17021-1 paragraph 9.4.6 requirements, under the leadership of the Audit Team Leader and prior to the closing meeting, the Audit Team shall:

- Evaluate audit findings in the context of the IRIS Certification Scope, Profile, and Management Systems Declaration (CSPMS) and agree audit conclusions accordingly
- Determine adjustments needed (if any) to the IRIS Certification Program Plan to ensure that it remains appropriate to the true scope, structure, complexity and geography of its Labour Recruiter’s operations and management system processes.

Depending on the Conformity Status, or Management System Maturity Rating, awarded for each individual indicator(per the Results Summary Page of the Audit Tool), the Audit Team Leader categorises the Labour Recruiter’s demonstrated audit outcome into one of the following certification statuses:

**Table 4.3.1 – Certification Status**

<b>Certification Status</b>	<b>Audit Performance Criteria Required to Meet Certification Status Level (refer to Paragraph 4.3.1 above for further detail)</b>
<b>Certified Leading</b>	No Major nonconformities (critical criterion or MS nonconformities) <b>AND</b> Fewer than 5 Minor non-conformities raised (non-critical <u>criterion</u> nonconformities) <b>AND</b> Overall (B.1) Management System Maturity Rating >70%
<b>Certified Performing</b>	No Major nonconformities (critical criterion or MS nonconformities) <b>AND</b> 5-15 Minor nonconformities raised (non-critical nonconformities) <b>AND</b> For Initial Certification Audit only <ul style="list-style-type: none"> <li>Overall (B.1) Management System Maturity Rating &gt;40%</li> </ul> For First Surveillance and all Subsequent Audits <ul style="list-style-type: none"> <li>Overall (B.1) Management System Maturity Rating &gt;50%</li> </ul>
<b>Developing</b>	No more than one Major nonconformity (critical criterion or MS nonconformity finding) <b>AND/OR</b> 15-20 Minor nonconformities raised <b>AND/OR</b> For Initial Certification Audit only <ul style="list-style-type: none"> <li>Overall (B.1) Management System Maturity Rating &lt;40%</li> </ul> For First Surveillance and all Subsequent Audits <ul style="list-style-type: none"> <li>Overall (B.1) Management System Maturity Rating &lt;50%</li> </ul>
<b>No Rating</b>	Not meeting the criteria for 'Developing' level (and No 'Alert' issues)
<b>Alert</b>	Evidence of substantial breach of ethical standards, or scheme requirements. (Note: 'Alert' status also results in immediate suspension of any existing certification – See below) (See above section: "Identifying and Recording Audit Findings")
<b>Applicant</b>	Application in progress (certification audit not yet completed)
<b>Application Expired</b>	Application no longer valid (either certification audit not completed within one year of application date <u>or</u> no progress from "Developing" status one year after completion of initial certification audit)
<b>Suspended</b>	A limited-time status applied when Labour Recruiter has failed to adhere to, or respond to IRIS Scheme and/or Audit Company requirements.
<b>Withdrawn</b>	Certification no longer valid (terminated or voluntary)

Except as stated, the above table applies not only to initial certification audit conclusions, but to audit conclusions at all stages of certification. In order to gain and maintain 'IRIS Certified' recognition within the system, the Labour Recruiter must meet the specified performance criteria of 'Certified Leading' or 'Certified Performing'.

At each stage of the certification cycle, based on the results of the most recent visit, the Audit Company evaluates the Labour Recruiter's audit performance criteria for the purpose of awarding or maintaining certification status. This occurs based on the adequacy of Labour Recruiter's nonconformity responses within prescribed timelines (see below). The Audit Company subsequently adjusts the Labour Recruiter's certification status.

A Labour Recruiter's failure to adequately address a minor nonconformity in the time specified shall result the raising of a major nonconformity (and an associated downward revision to certification status). Failure to adequately address a major nonconformity in the time specified shall result a recommendation for suspension (and associated revision to a 'Suspended' certification status).

#### **4.3.1.7. Closing Meeting**

In addition to ISO/IEC 17021-1 paragraph 9.4.7 requirements, Audit Team Leader shall:

- Review, confirm and record any adjustments needed to the IRIS Certification Scope, Profile, and Management Systems Declaration, the Audit Tool and/or the IRIS Certification Program Plan in respect of both current and future audit activities
- Review validation sub-audit activities and results.
- Explain and acquire Labour Recruiter's acceptance of non-conformities raised
- Explain MSIOs (Management System Improvement Opportunities) and their consequences
- Agree initial projected time required to address non-conformities raised, (including time needed for the Labour Recruiter to undertake root cause analysis and corrective actions).

#### **4.3.2. Audit Reporting and Reporting Considerations**

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply to Initial Certification Stage 2 Audits, Surveillance Audits and Recertification Audits (Unless otherwise stated):

- Employer names must not be stated on Audit Reports and references should be made in such a way that the employer is not readily identifiable. A code should be used e.g. 'Employer A'. The Labour Recruiter should be aware of the sites to which this applies but each employer organization should only be aware of its own site.
- Audit reports shall detail the scope of the Labour Recruiter business to which the Scheme certification application applies and clearly identify the version of the Labour Recruiter's IRIS Certification Scope, Profile, and Management Systems Declaration used during the audit.
- Audit reports shall detail and justify any and all deviations from the IRIS Certification Program Plan
- Audit reports shall detail any adjustments needed to the IRIS Certification Scope, Profile, and Management Systems Declaration and/or the IRIS Certification Program Plan in respect of future audit activities

Audit Reports and data are shared subject to the following conditions

- Audit reports are issued to the Labour Recruiter's IRIS Certification Manager (as named in the IRIS Certification Scope, Profile, and Management Systems Declaration) and become the property of the Labour Recruiter



- Audit Reports, completed Audit Tools and associated information are also provided by the Audit Company to the Scheme Manager
- Scheme Manager may share such audit data/information with the Scheme Owner, upon request
- Audit reports may only be shared with other parties with the express written permission of the Labour Recruiter
- Anonymized audit data (extracted from the audit report and associated information) may be published by Audit Company, Scheme Manager, or Scheme Owner

#### **4.3.2.1. Audit Team Conclusions (Report, Nonconformities and MSIOs)**

Audit Reports (incorporating a summary of related validation sub-audit activities) shall be delivered to the Labour Recruiter by electronic means within 10 working days (other than under exceptional circumstances) after the audit closing meeting.

Audit Reports shall refer to, and be sent with:

- **IRIS Nonconformity forms, or equivalent**, (one for each nonconformity\* finding raised by the audit team)
- Applicable Management System Improvement Opportunity (MSIO)\* findings.

*\* At this stage, Nonconformity forms and MSIOs define the audit team's findings with respect to elements of the Labour Recruiter's operations that do not fully meet the requirements of the IRIS Standard. In accordance with standard auditing practice, auditors are not permitted to specify (verbally or in writing) what actions the Labour Recruiter should take to address nonconformities.*

#### **4.3.2.2. Initial Certification Audit Report Response**

Within 20 working days (other than under exceptional circumstances) after the audit closing meeting, the Applicant (after due consideration of the audit report and related findings) respond to the Audit Team Leader authorizing certification audit response actions as follows:

- Submit Initial Certification Audit Report unchanged and unabridged to Audit Company's Certification decision-making process
- Defer submission of report. This allows the applicant Labour Recruiter up to 90 days from the closing meeting to investigate causes of nonconformities, take actions (see 'Review of Nonconformities, Corrections Corrective actions, and MSIOs' paragraph below), have its corrective actions evaluated by the Audit Team Leader, and authorize submission of a 'Updated Initial Certification Audit Report' to Audit Company's Certification decision-making process\*
- Deny Submission of Report. In this case, the Applicant has decided not to continue with the certification process. Applicant shall promptly notify the Audit Company and Scheme Manager of such decision. Should the Labour Recruiter decide to seek IRIS Certification again at some future time, the entire IRIS process shall be repeated (starting with a new application to the Scheme Manager).

*\*Note: Additional Audit Company fees may apply*



#### **4.3.2.3. Surveillance and Recertification Audit Report Response**

Other than to address any nonconformities raised (see 4.3.3, below), no Surveillance and Recertification audit report response actions are required of the Labour Recruiter. Audit reports shall be routinely processed by the Audit Company and the Scheme Manager.

*Note: The Labour Recruiter may decide not to continue with the certification process at any time. Under these circumstances, the Labour Recruiter shall promptly notify the Audit Company and Scheme Manager of such decision. Should the Labour Recruiter decide to seek IRIS Certification again at some future time, the entire IRIS process shall be repeated (starting with a new application to the Scheme Manager).*

#### **4.3.3. Labour Recruiter Review of Nonconformities and Response**

In addition to ISO/IEC 17021-1 paragraph 9.4.9 and 9.4.10 generic management system requirements, the following scheme-specific IRIS requirements apply to Initial Certification Stage 2 Audits, Surveillance Audits and Recertification Audits (unless otherwise stated):

##### **4.3.3.1. Containment Actions, Root-Cause Analysis, and Corrective Actions**

Following receipt of the Audit Report and associated Nonconformity forms, the Labour Recruiter is expected to:

- take containment actions to eliminate or mitigate the impact of any nonconformities identified (if appropriate)
- perform a 'root cause analysis' to identify probable/possible causes of nonconformities (and/or MSIOs)
- define (within a defined period) the corrective action(s) it chooses to take to address (actual or potential) 'systemic' root cause(s) or nonconformity.
- Implement (within a defined period) corrective actions needed to rectify/improve IRIS-related management system processes, thereby eliminating or minimizing the risk of recurrence of nonconformity. (i.e. Systemic actions to address management system shortcomings rather than rectification of identified symptoms).

In order to create an adequate record of the actions defined above, the Labour Recruiter completes the [IRIS Nonconformity Form](#), or equivalent, (and attaches supporting documentary evidence). In accordance with instructions provided by the Audit Company the Labour Recruiter submits evidence of systemic corrective actions undertaken, or planned to be undertaken, to the Audit Team Leader.

For aspects of nonconformities that are not under the direct control of the Labour Recruiter, the Labour Recruiter shall alert the employer or Business Partner in writing regarding aspects of nonconformities for which employer/business partner is accountable and request appropriate actions and responses. In such cases, the Labour Recruiter shall (as a minimum) provide the Audit Team Leader with sufficient evidence to:

- immediately demonstrate commitment to IRIS principles
- provide confidence that total conformity to IRIS principles will be achieved in the medium-long-term
- demonstrate continuous progress toward total conformity

Where appropriate, evidence provided shall include demonstrable actions undertaken by employer or Business Partner, (for example an email exchange, photographic evidence, updated records, interview evidence, etc.).

#### **4.3.3.2. Labour Recruiter Response to MSIOs (Management System Improvement Opportunities)**

The IRIS system does not treat MSIOs as nonconformities, (and does not, therefore, require immediate specific corrective actions within a closely defined timeline), however, the Labour Recruiter is expected to consider and improve its management system performance in those areas identified within MSIOs.

*Note: During subsequent audits, AC auditors evaluate the Labour Recruiter's response to MSIOs to determine the extent to which the Labour Recruiter demonstrates commitment to continual improvement (IRIS Criterion B1.8). Failure to adequately address MSIOs could lead to a reduced management system maturity score and thereby threaten continuing certification.*

#### **4.3.3.3. Audit Company Review of Corrective Actions Undertaken by Labour Recruiter**

In accordance with its IRIS Certification Program Plan, the Audit Team Leader reviews submitted IRIS Nonconformity forms to determine their adequacy/inadequacy. Where found to be inadequate, the Audit Team Leader may request further evidence of analysis or actions undertaken and resubmission of the IRIS Nonconformity form(s).

Dependent upon the nature of the nonconformity and the reliance that may be placed on documentary evidence, the Audit Team Leader advises Labour Recruiter whether corrective actions:

- are accepted and closed based on documentary evidence submitted
- are conditionally accepted subject to follow-up during the next scheduled audit visit
- cannot be accepted until a Corrective Action follow-up visit occurs to access, review and verify additional evidence of effective implementation of corrective actions undertaken

On completion of evaluation, the Audit Team Leader informs the Labour Recruiter of the outcome by sending an [IRIS Corrective Action Follow-Up form](#), or equivalent.

If the review of corrective actions is undertaken in response to Applicant's report deferment request (following an initial certification audit only - see above), Audit Team Leader shall submit an Updated Initial Certification Audit Report to Audit Company's Certification decision-making process.

The table below outlines the consequences if nonconformities are raised and not effectively addressed.

**Table 4.3.2 Nonconformity and Suspension Consequences**

Nonconformity and Suspension Consequences				
Nonconformity action point	Type >>>	Alert Nonconformity	Major Nonconformity	Minor Nonconformity
Upon raising a nonconformity	Action >>>	Immediate suspension – Terms of suspension agreed with Audit Company (Up to a maximum 180 days)	Closure timeline agreed with Audit Company (Up to a maximum 90 Days)	Closure timeline agreed with Audit Company (Up to a maximum 90 Days)
	Immediate IRIS Status Change >>>	Changed to 'Alert'	None	None
If nonconformity is not effectively addressed and closed by agreed date	Action >>>	Not applicable – Suspension Process Prevails	Certification Suspended – Terms of suspension agreed with Audit Company (Up to a maximum 180 days)	Becomes a Major Nonconformity  Closure timeline agreed with Audit Company (Up to a maximum 90 Days)
	Immediate IRIS Status Change >>>	Not applicable – Suspension Process Prevails	Changed to 'Suspended'	None
If nonconformity is effectively addressed and closed by agreed date	Action >>>	Not applicable – Suspension Process Prevails	Nonconformity Closed. (Certification decision-making may progress where appropriate)	Nonconformity Closed. (Certification decision-making may progress where appropriate)
	Immediate IRIS Status Change >>>	Not applicable – Suspension Process Prevails	None	None
If terms of suspension are not met	Action >>>	Labour Recruiter & Scheme Manager notified of certificate withdrawal		
	Immediate IRIS Status Change >>>	Changed to 'Withdrawn'		
If terms of suspension are met	Action >>>	Labour Recruiter & Scheme manager notified of lifted suspension		
	Immediate IRIS Status Change >>>	Changed to 'Certified Performing' or 'Certified Leading' (as appropriate)		

Should the Labour Recruiter believe that Audit Company decision-making (as outlined above) has not been applied reasonably and equitably (in accordance with the principles of the IRIS Standard and the requirements of this document) it may raise an appeal (See section 6.4, below).

## 5. CERTIFICATION DECISION PROCESS REQUIREMENTS

### 5.1. Certification Processes

#### (ISO/IEC 17021-1:2015 section 9.5 applies)

This section outlines certification requirements for Audit companies. Each Audit Company undertakes and assures IRIS Certification decision-making processes in a sequence and manner equivalent to any other management system decision-making processes:

- Defined decision making structure and authority (assuring impartiality)
- Actions prior to making a decision
- Information for granting initial certification
- Information for granting recertification
- Publication of Certification Information

In addition to the broad requirements outlined below, Audit Company personnel must refer to the supplemental document, “IRIS Certification and Audit Protocols” to fully understand and meet detailed IRIS scheme requirements.

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply as stated:

#### 5.1.1. Defined decision making structure and authority

Persons or committees undertaking certification decision-making on behalf of the Audit Company shall be different and independent from those who carried out the audit(s), and shall be able to demonstrate familiarity with, and understanding of, IRIS scheme requirements, including the requirements of the IRIS Standard and these General Requirements.\*

*\* Note: In future, technical review by a “Registered IRIS Audit Team Leader” will be required as part of the certification decision-making process. Refer to the current version of “IRIS Certification and Audit Protocols” document for current requirements.*

#### 5.1.2. Actions prior to making a decision

Under the IRIS scheme, certification may be granted at the appropriate level in accordance with table 4.3, above.

#### 5.1.3. Information for Granting Initial Certification

In addition to other information required, certification decisions shall be made taking into consideration:

- the applicable version of the Labour Recruiter’s IRIS Certification Scope, Profile, and Management Systems Declaration (CSPMS)
- the IRIS Certification Audit Plan
- IRIS audit report

While not considered ‘certified’, applicants not initially granted “Leading” or “Performing” certification status are recognized in the program under “Developing” status. Applicant may remain at “Developing” status for up to one year following the final day of the initial certification stage 2 audit, following which status shall be listed as “Application Expired” and the Scheme Manager shall be informed. “Expired” status requires the Labour Recruiter to repeat

and successfully complete stage 1 and stage 2 initial certification audits and achieve a certification status of “Leading” or “Performing” before the “Application Expired” status can be replaced.

#### **5.1.4. Information for Maintaining Certification**

Provided review of the surveillance audit conclusions received by the Audit Company do not indicate the need for suspension or withdrawal of certification, continuity of certification is assumed, (i.e. no certification decision-making is needed following a planned surveillance audit.).

#### **5.1.5. Information for Granting Recertification**

In addition to other information required, recertification decisions shall be made taking into consideration:

- the applicable version of the Labour Recruiter’s IRIS Certification Scope, Profile, and Management Systems Declaration
- the IRIS Certification Audit Plan
- IRIS audit report

#### **5.1.6. Certification (and Re-Certification) by the Audit Company**

Within ten working days following the certification or recertification decision, the Audit Company publishes and sends an IRIS Certificate to the Labour Recruiter. Certificates (as PDFs) are issued only to those IRIS certified Labour Recruiters who have achieved the Performing or Leading level. These shall clearly state that they are valid only at the date of printing and that certification must be confirmed by checking the status on the [IRIS Scheme Manager](#) web site. The Certificate as a minimum shall include:

- The IRIS Certification Mark
- The Scheme Manager’s IRIS Audit Company Accreditation Symbol
- A Unique IRIS Certification Reference Number
- Name and address of the Labour Recruiter
- Name and address of the Audit Company
- Date of the Corrective Action Rectification Verification visit, if/when applicable
- Date of Certification
- Date of Certification expiry
- Name and Title of the Audit Company Responsible Person (Auditor Scheme Manager)
- Scope of Labour Recruiter activity
- Statement that the certificate remains the property of the Audit Company

#### **5.1.7. Scheme Manager Notification**

At the time of each and every change to the certification status of a Labour Recruiter, the Audit Company sends an “IRIS Certification Update” (along with copies of the following documents in electronic form) to the IRIS Scheme Manager:

- A copy of the IRIS Certificate (if issued)
- The applicable versions of Labour Recruiter’s IRIS Certification Scope, Profile, and Management Systems Declaration
- The IRIS Certification Audit Plan
- The IRIS Certification (or recertification) Audit Report (updated, if appropriate)
- Related IRIS Nonconformity forms (updated as appropriate)

#### **5.1.8. Publication of Certification Status on IRIS Web Site**

Within 10 working days of receipt of the certification/recertification documentation package from the Audit Company, the Scheme Manager shall update Labour Recruiter certification status and associated data on the [IRIS Scheme Manager](#) web site.

If certification has not yet been granted, but the Labour Recruiter remains within the IRIS Certification program, the status is changed from “Applicant” to “Developing”. Labour Recruiters may:

- Remain at “Developing” status for up to one year following the final day of the initial certification audit, following which their status is listed as “Application Expired”.
- Request Audit Company to undertake review and closure of remaining nonconformities and subsequently advise Scheme Manager of a new certification decision (via an “Updated Initial Certification Audit Report”).

Once certified, a Labour Recruiter is referred to as IRIS Certified Labour Recruiter. The Labour Recruiter’s certification status is made publicly viewable on the [IRIS Scheme Manager](#) web site with the following information:

- The name of the Certified Labour Recruiter
- Principal address of the Certified Labour Recruiter
- Date of validity and date of expiry of each certificate
- Labour Recruiter licence number(s), or other valid authorisation(s) to perform labour recruitment activities, issued by the appropriate legal authority[ies]”
- Certificate number
- Certification status: “Certified - Performing” or “Certified - Leading”, as appropriate.
- The name of the Audit Company granting certification

*Note: While the IRIS Scheme Manager handles audit and certification information provided by the Audit Company, it not responsible for reviewing the completeness, quality, or validity of information provided, (i.e. responsibility for certification decision-making rests solely with the Audit Company).*

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## **6. CERTIFICATION COMPLAINTS; TRANSFERS; SUSPENSIONS / WITHDRAWALS / SCOPE REDUCTIONS; AND APPEALS PROCESS REQUIREMENTS**

This section outlines requirements for handling the various types of complaints an Audit Company may encounter, together with the requirements for the handling of certification, transfers, suspensions, withdrawals and scope reductions and appeals. Each Audit Company shall ensure the following requirements are met.

### **6.1. Complaints Processes (ISO/IEC 17021-1:2015 section 9.8 applies)**

The Audit Company handles IRIS Certification complaints in a sequence and manner equivalent to any other management system complaints processes.

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

#### **6.1.1. Complaints Escalation within the IRIS Program**

- Should an interested party wish to complain about the performance of a Labour Recruiter, or the integrity of the audit and/or certification processes, in the first instance, the complaints process of the Audit Company must be followed.
- After the audit company complaint process is exhausted, should an interested party wish to make a comment or complaint concerning the application of the Scheme rules by the Audit Company, then this may be raised in writing to the Scheme Manager. The complainant shall be directed to the complaints process of the Scheme Manager at this time.
- In addition to effectively handling and resolving complaints it receives directly, the Audit Company shall cooperate (promptly and as requested) with the investigation and resolution certification-related complaints originating from other sources (for example: via the scheme Manager Complaint process, or the overarching IRIS Monitoring and Compliance Mechanism MCM).

#### **6.2. Transfer of Certification**

##### **(ISO/IEC 17021-1:2015 section 9.5.3.3 applies)**

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

##### **6.2.1. Conditions for Certificate Transfer**

Certified Labour Recruiter may transfer its certification to an alternative accredited Audit Company at any time, however, it is usual for this to occur at the end of a certification cycle.

When certified Labour Recruiter transfers certification relinquishing Audit Company shall:

- Provide the Scheme Manager with advance notification (in writing) of the details of the proposed transfer (Including the name and contact details for alternative accredited Audit Company to undertake the new certification).
- Release IRIS Scheme data and information (refer 2.5 above) for at least one full certification cycle to another accredited IRIS Audit Company.

When certified Labour Recruiter transfers certification, the Labour Recruiter and prospective new Audit Company shall:

- Follow the processes for application, audit and certification (sections 3 and 4, above) in their entirety.

*Note: The new application form and associated fee must be received by Scheme Manager at least 60 days before the existing certification is due to expire.*

#### **6.3. Suspending, Withdrawing or Reducing the Scope of Certification**

##### **(ISO/IEC 17021-1:2015 section 9.6.5 applies)**

The Audit Company undertakes IRIS Certification suspension, withdrawal and scope reduction processes in a sequence and manner equivalent to any other management system suspension, withdrawal and scope reduction processes.

In addition to ISO/IEC 17021-1 paragraph 9.6.5 generic management system requirements, the following scheme-specific IRIS requirements apply:

#### **6.3.1. Reasons for Changes to Certification Status**

The Audit Company reserves the right to refuse applications or renewals and suspend or terminate certification to prevent the Scheme being brought into disrepute. Certification may be denied, suspended, or rescinded by the reasonable decision of the Audit Company for reasons including the following non-exhaustive criteria:

- Bankruptcy (or equivalent) of the Labour Recruiter
- Non-payment for an audit (or related work) performed in accordance with the certification contractual agreement
- 'Alert' situations (as defined above in "Audit Performance" section, above)

#### **6.3.2. Conditions for Changes to Certification Status**

The Audit Company (in consultation with the Scheme Manager, where appropriate) reserves the right to specify conditions for lifting of suspension, certificate withdrawal, or certificate reinstatement.

### **6.4. Appeals**

#### **(ISO/IEC 17021-1:2015 section 9.7 applies)**

The Audit Company undertakes the IRIS Certification appeals process in a sequence and manner equivalent to any other management system certification appeals process.

In addition to ISO/IEC 17021-1 paragraph 9.7 generic management system requirements, the following scheme-specific IRIS requirements apply:

#### **6.4.1. Support of Interpretive Decision-Making**

Although Audit Company remains solely responsible for all decisions at all levels of the appeals-handling process (ISO/IEC 17021-1:2015 section 9.7.2 refers), where doubt exists regarding technical interpretation of the IRIS Standard, Audit Company shall seek the counsel of the IRIS Scheme Owner. Such requests shall be made in writing to IRIS Scheme Owner, with copy to IRIS Scheme Manager.

#### **6.4.2. Escalation**

After the appeal process is exhausted, should an interested party wish to make a comment or complaint concerning the application of the Scheme rules by the Audit Company, then this may be raised in writing to the Scheme Manager. The complainant shall be directed to the complaints process of the Scheme Manager at this time.



## **7. AUDIT COMPANY MANAGEMENT PROCESS REQUIREMENTS**

### **7.1. Audit Company – Principles**

**(ISO/IEC 17021-1:2015 section 4.1 applies)**

This section outlines requirements to assure the competence, consistent operation and impartiality of Audit Companies.

In order to participate in the IRIS Certification Scheme, Audit Company shall:

- be accredited by IRIS Scheme Manager in accordance with the IRIS Scheme General Requirements Document
- be in good standing with IRIS Scheme Manager (no suspensions)
- undergo continuous evaluation and accreditation against these IRIS Scheme General Requirements in accordance with IRIS Scheme Manager's oversight/assurance program (including, but not limited to both shadow audits and office audits by competent IRIS Scheme Manager audit staff)
- demonstrate geographical scope capability

On behalf of the Scheme Owner and subject to the accreditation and oversight of the Scheme Manager, Audit Companies are responsible for conducting audit and certification activities within the IRIS Conformity Monitoring and Integrity Program (see section 1.3, above for a full definition). Each Audit Company is required to establish and conduct its affairs in a manner equivalent to any other management system audit scheme and in a manner which gives confidence to interested parties that Labour Recruiters' management systems fulfil IRIS specified requirements. In doing so, the Audit Company shall demonstrate adherence to the following principles (in addition to ISO/IEC 17021-1 generic principles):

#### **7.1.1. Impartiality (ISO/IEC 17021-1:2015 4.2 applies)**

For all personnel whose activities may impact IRIS Certification (including individuals acting upon behalf of the organization), the Audit Company shall:

- establish and promote a conflicts-of-interest, anti-bribery and anti-corruption policy (or policies) appropriate to identified operational risks within its IRIS program
- ensure separation of any and all activities of the organization that may cause a conflict-of-interest with IRIS Certification;
- specify consequences for individuals who deviate from impartiality principles;
- Implement timely and appropriate actions to remedy the consequences and prevent recurrence where deviations to impartiality principles have been identified.
- Ensure affected personnel are familiar with, and understand, the conflicts-of-interest, anti-bribery and anti-corruption policy, including requirements that all affected personnel:
  - operate with professional integrity;
  - are free from commercial, financial or other pressures that might affect their judgement;
  - are prohibited from promoting any goods or services during evaluation activities;

- are specifically required to avoid any inference that the actions, influence, or relationships of a Labour Recruiter, or other influential party, may directly or indirectly impact audit and/or certification decision-making processes.
- Fully understand the consequences of failure to adhere the policy.

Any breach of IRIS-scheme-related integrity by any individual representing the Audit Company at any level, shall result in the immediate suspension of the Audit Company's accreditation status (or the suspension of the accreditation process in the case of Audit Company accreditation applicants).

*Note: See also sections 7.1.7 and 7.2 below for further specific impartiality requirements.*

#### **7.1.2. Competence (ISO/IEC 17021-1:2015 4.3 applies)**

Audit Company shall:

- Have processes to ensure that personnel possess appropriate knowledge and skills relevant to IRIS Certification in the geographic areas in which it operates. See sections 7.1.7 and 7.4 below, for further specific competence requirements.
- Qualify and register all proposed IRIS Scheme auditors and personnel involved with certification decision-making (refer to "IRIS Certification and Audit Protocols " document for full qualification details.)

#### **7.1.3. Responsibility (ISO/IEC 17021-1:2015 4.4 applies)**

Audit Company shall:

- Be responsible for maintaining auditing, reporting, certification, and information sharing processes that meet the expectations of interested parties by ensuring that sufficient, credible evidence is sampled, gathered, evaluated, recorded and communicated in support of IRIS Certification decision-making, (in accordance with scheme requirements - see also 7.5).

#### **7.1.4. Openness (ISO/IEC 17021-1:2015 4.5 applies)**

In accordance with IRIS Scheme information requirements (see also 7.5) and applicable data protection laws, Audit Company shall:

- contractually require its Labour Recruiter certification clients to grant it the right to share non-confidential data gathered during the IRIS audit and certification processes.
- provide Scheme Manager access to its IRIS-related audit and certification processes, data and records.
- provide public access to, IRIS-related, audit and certification processes, and defined certification data.

*Note: See "Confidentiality and Data Protection" section (2.5, above) for further details*

#### **7.1.5. Confidentiality (ISO/IEC 17021-1:2015 4.6 applies)**

Audit Company shall:

- comply with IRIS scheme Confidentiality and Data Protection confidentiality requirements (as described in section 2, above).

- contractually advise and assure its Labour Recruiter applicant and certification clients of the types of information to remain confidential and the types of information to be shared with various parties (in accordance with scheme requirements - See also 7.5).

*Note: See “Confidentiality and Data Protection” section (2.5, above) for further details*

#### **7.1.6. Responsiveness to Complaints (ISO/IEC 17021-1:2015 4.7 applies)**

Audit Company shall:

- respond effectively and appropriately to grievances and complaints made against Audit Company’s IRIS audit and certification operations and its Certified Labour Recruiter operations. (See section 6, above for details).

#### **7.1.7. Risk-based Approach (ISO/IEC 17021-1:2015 4.8 applies)**

Audit Company shall maintain and implement a documented risk management plan (or plans) which specifically identifies and assesses risks specific to its IRIS audit and certification processes including risks and control measures specifically associated with:

- Independence, impartiality and integrity of all personnel supporting the Audit Company’s IRIS-related audit and certification processes.
- Capability and competency of personnel to manage, plan and deliver IRIS audit and certification services in specific geographic locations.
- IRIS validation sub-audit methodology and sample selection which provides sufficient framework for the Audit Company to be able to consistently and effectively select and apply validation sub-audit methodologies and sampling levels to provide a credible level confidence in its IRIS Certification.
- Audit Company consideration of individual Labour Recruiter risks (at the time of entering into a certification agreement (See Section 3, above, for details) and periodically throughout the certification lifecycle. (See ‘IRIS Certification & Audit Protocols’ for additional details and guidance).

### **7.2. Audit Company – General Requirements and Organizational Structure (ISO/IEC 17021-1:2015 sections 5 and 6 apply)**

Audit Company shall be accredited by Scheme Manager prior to conducting IRIS Certification audits. Each audit Company is accredited by the Scheme Manager to provide IRIS Certification services for a defined geographic scope, based upon its demonstrated ability to meet geographical/ technical/ governance/ management systems/ infrastructure requirements to perform audit and certification services in a professional and independent manner in accordance with the requirements of these General Requirements and (except as explicitly excluded within this document) in accordance with ISO/IEC 17021-1: 2015.

The general requirements and organizational structure obligations for an Audit Company operating under the IRIS Scheme are equivalent to those under other ISO/IEC 17021-based certification schemes.

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

#### **7.2.1. Legal, Contractual, Liability, and Financing Responsibilities**

**(ISO/IEC 17021-1 section 5.1 and 5.3, apply)**

Audit Company's management shall be able to readily demonstrate that its legal, contractual, liability, and financing arrangements adequately address the scope of IRIS audit and certification services in accordance with the requirements of ISO/IEC 17021-1 section 5.1 and 5.3.

**7.2.2. Impartiality****(ISO/IEC 17021-1 section 5.2 and paragraph 7.1, above, apply)**

Audit Company shall explicitly identify potential risks of conflict-of-interest associated with its delivery of IRIS audit and certification services and shall be able to clearly demonstrate steps taken to minimize or eliminate and monitor such risks within its IRIS Certification program.

**7.2.3. IRIS Certification Manager**

Audit Company shall appoint an IRIS Certification Manager, who (irrespective of other duties and responsibilities) shall have overall responsibility for ensuring that Audit Company's audit and certification processes meet IRIS requirements. Additionally, the appointed individual shall meet the following requirements:

- a. Be able to communicate clearly in English (written and spoken)
- b. Have a management role with documented key accountability for the IRIS Scheme
- c. Be responsible for, and respond to, IRIS Scheme operational enquiries and complaints
- d. Be responsible for promulgating IRIS requirements within the Audit Company
- e. Be the nominated point of contact for the Scheme Manager
- f. Be committed to assisting the Scheme Manager in implementing any changes to the IRIS Scheme within the Audit Company as and when changes occur
- g. Be authorised to sign and return communications requiring written receipt to the Scheme Manager
- h. Be responsible for communicating and overseeing the effective implementation of expectations of Scheme Owner and Scheme Manager to all personnel whose work may impact the quality or integrity of the IRIS Certification Scheme
- i. Attend IRIS Scheme meetings, as appropriate

**7.3. Audit Company – Management System****(ISO/IEC 17021-1:2015 section 10 applies)**

The Audit Company shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of IRIS scheme requirements as defined within these General Requirements and (unless explicitly excluded within this document) in accordance with ISO/IEC 17021-1: 2015. The Audit Company's management system shall comprise appropriate documentation (policies and procedures), implementation (operations and practices) and evidence of implementation (data and records) to provide assurance that its IRIS audit and certification processes are planned and are effective in meeting IRIS Scheme Owner and interested party expectations.

The Audit Company's management systems obligations under the IRIS Scheme are equivalent to management system requirements applicable to other ISO/IEC 17021-based certification schemes. In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

**7.3.1. Management System Structure**

#### **7.3.1.1. Integrated and Standalone Management Systems**

Audit Company's management system shall address and meet IRIS-specific requirements (as detailed in these General Requirements and associated documentation) irrespective of whether Audit Company maintains:

- a standalone management system to fulfil only IRIS scheme requirements, or
- an integrated management system to fulfil requirements of multiple certification schemes
- a combination integrated and standalone system

#### **7.3.2. Management System Content**

In addition to the requirements of ISO/IEC 17021-1:2015 10.2 'General Management System Requirements' and ISO/IEC 17021-1:2015 9.9 'Client Records', the Audit Company's management system shall include:

**7.3.2.1.** A document (or documents) indexing clause-by-clause the entirety of the Audit Company's documented management system against the requirements of ISO/IEC 17021-1:2015 and the requirements of these IRIS General Requirements.

**7.3.2.2.** Documented processes and record requirements for the effective implementation of:

- A document (or documents) indexing clause-by-clause the entirety of the Audit Company's documented management system against the requirements of ISO/IEC 17021-1:2015 and the requirements of these IRIS General Requirements.
- IRIS application processes (General Requirements section 3, above)
- IRIS audit processes (General Requirements section 4, above)
- IRIS Certification decision processes (Section 5, above)
- IRIS Certification complaints; transfers; suspensions / withdrawals / scope reductions; and appeals processes (Section 6, above)
- IRIS personnel competency development, review, approval and ongoing calibration/training processes (Section 7, below)
- IRIS-related data-sharing/data privacy, and confidentiality processes (Section 2, above)
- IRIS-related anti-bribery and anti-corruption processes (appropriate to Audit Company's identified operational risks and the mitigation thereof) (Section 7, above)

#### **7.4. Audit Company – Personnel Resources and Competency (ISO/IEC 17021-1:2015 section 7 applies)**

Audit Company shall assure the knowledge and skills of all personnel involved with IRIS audit and certification processes in a manner equivalent to other ISO/IEC 17021-based certification schemes. Development and assurance of competence for the various Audit Company roles shall include:

- determination of needs
- initial and ongoing evaluation of competence
- demonstration that evaluation methods are effective.

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

**7.4.1.** Only personnel who meet the mandatory qualifications, sector experience and technical knowledge specified by the IRIS Scheme Manager in the document “IRIS Certification and Audit Protocols ” shall perform duties which may affect the quality or integrity of IRIS Certification.

**7.4.2.** All personnel performing duties which may affect the quality or integrity of IRIS Certification shall be able to demonstrate their understanding of audit and certification principles (see 7.1 above), including the requirements of the Audit Company’s integrity policy (or policies) and adherence to related control measures.

**7.4.3.** In addition to the general requirements outlined here, Audit Company shall adhere to Personnel Competency/Qualification requirements detailed within the “IRIS Certification and Audit Protocols” document.

**7.4.4.** Outsourcing of IRIS Certification program activities to another body, is not permitted under the IRIS Scheme.

*Note: “Outsourcing” in this context does not include Audit Company contracting with qualified individual auditors, or other specialists, who individually meet the requirements of section 7.4, above (as addressed by ISO/IEC 17021-1:2015 paragraph 7.5.4 Note 1).*

## **7.5. Audit Company – Scheme Information Requirements (ISO/IEC 17021-1:2015 section 8 applies)**

The Audit Company’s obligations and arrangements for publication of information about its audit and certification processes, certification details, rules for the use of its marks, and communications to and from its certification clients under the IRIS Scheme are equivalent to those under other ISO/IEC 17021-based certification schemes.

In addition to ISO/IEC 17021-1 generic management system requirements, the following scheme-specific IRIS requirements apply:

### **7.5.1. IRIS Certification Mark**

In promoting IRIS Certification, Audit Company and its clients shall adhere to the IRIS Publication “IRIS Logo, Certification Mark & Claims Guide”. *(To be published Q1/2023)*

### **7.5.2. Certification Information and Related Data**

Audit Company and its clients shall adhere to the requirements of section 2.5 above and annex 1.

The IRIS Scheme aims to communicate in near-real-time:

- Certificate holder certification status (including status history)
- Certificate holder scope of certification (including the nature and type of Labour Recruiter’s upstream and downstream Business Partners, oversight methodologies and geographical scope)

- Certificate holder audit and conformity details (including performance level achieved versus individual indicators within the IRIS Standard)

### **7.5.3. Communications with Scheme Manager**

#### **7.5.3.1. In Preparation for Oversight Audits**

In preparation for initial accreditation and maintenance audits, Audit Company shall have processes in place and be prepared to provide Scheme Manager with:

- Facilitation of access and arrangements for Scheme Manager representatives to
  - conduct office audits
  - conduct witness audits (shadow audits of Audit Company auditing Labour Recruiter processes)
  - conduct audits at a certificate holder or employer premises (often at short notice, and in some cases unannounced)
- Management system documentation and records, as requested
  - Including, in advance of any announced oversight witness audit, outputs from Audit Company's audit planning and preparation processes (see sections 3 & 4, above)

#### **7.5.3.2. Subsequent to Oversight Audits**

Audit Company communication with the Scheme Manager shall be by appropriate timely and confidential electronic transfer and shall ensure:

- Audit Reports and related certification related data are communicated within the specified timelines in coordination with the Labour Recruiter.
- Non-conformities, sanctions and other post certification information/data are communicated promptly in writing so that reflected changes can be made to the certificate holder's 'Certification Status' on the [IRIS Scheme Manager](#) web site.
- The status of all certificate holders is up to date on the [IRIS Scheme Manager](#) web site.
- Audit and certification process details and outcomes are readily accessible.

### **7.5.4. Communications with Certification Clients**

Audit Company shall ensure that Labour Recruiter certificate holders are aware that:

- Significant changes within the organization (e.g. ownership, management, countries of origin) must be reported to the Audit Company and that these shall then be reported to the Scheme Manager.
- Any prosecutions that are pending or likely to be brought against them with respect to labour conformity must be reported to the Audit Company and that these shall then be reported to the Scheme Manager.
- Audit information is released to the Scheme Manager.
- Participation in the Conformity Monitoring and Integrity Program is required including:
  - Cooperation with reasonable requests from Scheme Manager or Scheme Owner.
  - Providing reasonable access to Scheme Manager for the purpose of conducting scheme oversight audits (e.g. independent verification, or shadow audits).
- Appointed Audit Team Leader must be changed/rotated at least once in each certification cycle.





## **8. IRIS SCHEME MANAGER PROCESS REQUIREMENTS**

### **8.1. Scheme Manager – General Requirements**

#### **(ISO/IEC 17011:2017 section 4 applies)**

This section outlines requirements to assure the competence, consistent operation and impartiality of The IRIS Scheme Manager. On behalf of the IRIS Scheme Owner, the Scheme Manager is responsible for maintaining and overseeing the IRIS Conformity Monitoring and Integrity Program (see section 1.3, above for a full definition). The program's focus is upon conformity and integrity of certification, ensuring accredited Audit Companies are meeting the required ongoing audit and certification criteria, thereby providing assurance that certificate holders are upholding the requisite level of conformity to the IRIS Standard.

In addition to ISO/IEC 17011:2017 generic requirements stated above, the Scheme Manager shall adhere to the following scheme-specific IRIS requirements.

#### **8.1.1. Legal Entity, Financing and Liability**

##### **(ISO/IEC 17011:2017 sections 4.1 and 4.5 apply)**

No additional requirements apply.

#### **8.1.2. Independence & Impartiality**

##### **(ISO/IEC 17011:2017 section 4.4 applies)**

In addition meeting the requirements of ISO/IEC 17011:2017 paragraph 4.4.2, 4.4.9 and 4.4.11-4.4.13, the Scheme Manager shall be free from any perceived conflict-of-interest related to its relationship(s) with entity(ies) or individual(s) which has (or may have), a business interest in the outcome of IRIS Audit Company accreditation activities, or IRIS Certification activities.

*Note: This includes freedom from commercial relationship(s) with any entity which certifies, or may certify (to any standard, company code, or other normative document) Labour Recruiter organization(s), or organization(s) having commercial relationship with Labour Recruiter (including organizations in the worker provisioning chain, upstream or downstream of a Labour Recruiter).*

In meeting the requirements of ISO/IEC 17011:2017 paragraph 4.4.10, the Scheme Manager shall fulfil the market-based requirements of the Scheme Owner with respect to any limitations for Audit Company accreditations within specific geographic markets.

#### **8.1.3. Establishing and Maintaining the IRIS Conformity Monitoring and Integrity Program**

##### **(ISO/IEC 17011:2017 section 4.6 applies)**

In addition to meeting the requirements of ISO/IEC 17011:2017 paragraph 4.6, the Scheme Manager shall fulfil the requirements of the Scheme Owner without unreasonably contradicting or excluding any of the requirements included in ISO/IEC 17011:2017 or ISO/IEC 17021-1:2015.

#### **8.1.4. Audit Company Agreement**

##### **(ISO/IEC 17011:2017 section 4.2 applies)**

In addition to meeting the requirements of ISO/IEC 17011:2017 paragraph 4.2, the Scheme Manager shall have legally enforceable arrangements that require each Audit Company to:

- maintain a legally enforceable arrangement with their Labour Recruiter clients that commits them to

- provide Audit Company and Scheme Manager with accompanied access to premises, personnel, workers and records for the purposes of assuring adherence to IRIS requirements .  
*Note: The timing of access may be announced, unannounced, or semi-announced ('window-of-time')*
- share operational data, as demanded by the IRIS scheme. (See sections 2.5 and 3.6, above)
- record, report and share requested IRIS audit and certification data in the manner prescribed from time to time by the Scheme Manager.

#### **8.1.5. Use of IRIS Marks**

##### **(ISO/IEC 17011:2017 section 4.3 applies)**

In meeting the requirements of ISO/IEC 17011:2017 paragraph 4.3, Scheme Manager shall administer and oversee adherence to the requirements of the following document:

- “IRIS Logo, Certification Mark & Claims”. *(Not yet published 2/2019)*

#### **8.2. Scheme Manager – Organizational Structure**

##### **(ISO/IEC 17011:2017 section 5 applies)**

No additional requirements apply.

#### **8.3. Scheme Manager – Resources**

##### **(ISO/IEC 17011:2017 section 6 applies)**

In addition to ISO/IEC 17011:2017 generic requirements stated above, the Scheme Manager shall adhere to the following scheme-specific IRIS requirements.

##### **8.3.1. Scheme Manager – Personnel Competence**

###### **(ISO/IEC 17011:2017 section 6.1 – 6.3 applies)**

In addition to meeting the requirements of ISO/IEC 17011:2017 paragraph 6.1 - 6.3, the Scheme Manager shall ensure that its personnel demonstrate:

- Familiarity with, and competency to fulfil ISO/IEC 17011:2017 requirements as they pertain to IRIS Certification Scheme and these General Requirements.
- Familiarity with, and competency to oversee Audit Companies' adherence to ISO/IEC 17021-1:2015 requirements as they pertain to IRIS Certification Scheme and these General Requirements.

##### **8.3.2. Scheme Manager – Outsourcing**

###### **(ISO/IEC 17011:2017 section 6.4 applies)**

Outsourcing of IRIS Conformity Monitoring and Integrity Program activities to another body, is not permitted under the IRIS Scheme.

*Note: “Outsourcing” in this context does not include Scheme Manager contracting with qualified individual auditors, or other specialists, who individually meet the requirements of section 8.3.1, oversight/monitoring activities to provide scheme oversight/monitoring activities.*

#### **8.4. Scheme Manager – Management Controls and Processes**

**(ISO/IEC 17011:2017 section 9 applies)**

The Scheme Manager shall establish, document, implement and maintain a management system that is capable of supporting and demonstrating the consistent achievement of IRIS scheme requirements as defined within these General Requirements and (unless explicitly excluded within this document) in accordance with ISO/IEC 17011: 2017.

In addition to ISO/IEC 17011:2017 generic requirements stated above, the Scheme Manager shall adhere to the following scheme-specific IRIS requirements.

**8.4.1. General**

(ISO/IEC 17011:2017 sections 9.1 – 9.2 apply)

The management system shall comprise appropriate documentation (policies and procedures), implementation (operations and practices) and evidence of implementation (data and records) to provide assurance that the Scheme Manager's IRIS Conformity Monitoring and Integrity Program processes are planned and are effective in meeting IRIS Scheme Owner and interested party expectations.

**8.4.1.1. ISO/IEC 17011 Conformity**

The Scheme Manager shall maintain a management system that adheres to the requirements of ISO/IEC 17011-1:2017 section 9.1.4 "Option A" – A standalone ISO/IEC 17011-based management system. (i.e. "Option B" – ISO 9001-based system is NOT an acceptable option for provision of IRIS Scheme Manager services.).

**8.4.1.2. Integrated and Standalone Management Systems**

Irrespective of whether Scheme Manager maintains:

- a standalone management system to fulfil only IRIS scheme requirements, or
- an integrated management system to fulfil requirements of multiple oversight schemes;
- a combination integrated and standalone system;

.. the management system shall address and meet IRIS-specific requirements (as detailed in these General Requirements and associated documentation).

**8.4.2. Scheme Manager – Management System  
(ISO/IEC 17011:2017 section 9.2 applies)**

In addition to ISO/IEC 17021-1 generic management system requirements, the Scheme Manager's management system shall include:

**8.4.2.1.** A document (or documents) indexing clause-by-clause the entirety of the Scheme Manager's documented management system against the requirements of ISO/IEC 17011:2017 and the requirements of these IRIS General Requirements.

**8.4.2.2.** Documented processes and record requirements for the effective implementation of:

- IRIS Audit Company application processes
- IRIS Audit Company oversight/monitoring processes
- IRIS Audit Company accreditation decision processes
- IRIS Audit Company accreditation extension processes

- IRIS Audit Company complaint processes
- IRIS Audit Company appeals, suspension, scope-of-accreditation reduction and accreditation withdrawal processes
- IRIS accreditation oversight personnel competency development, review, approval and ongoing calibration/training processes
- IRIS-related data-sharing/data privacy, and confidentiality processes (Section 2, above)
- IRIS-related anti-bribery and anti-corruption processes (appropriate to identified operational risks and the mitigation thereof) (8.1, above refers)

#### **8.4.3. Scheme Manager – Document & Records Control (ISO/IEC 17011:2017 section 9.3 & 9.4 apply)**

No additional requirements apply.

#### **8.4.4. Scheme Manager – Nonconformities, Corrective Actions & Improvement (ISO/IEC 17011:2017 section 9.5 & 9.6 apply)**

No additional requirements apply.

#### **8.4.5. Scheme Manager – Internal Audits & Management Reviews (ISO/IEC 17011:2017 section 9.7 & 9.8 apply)**

Outputs from the IRIS scheme management review shall be shared with the IRIS Scheme Owner and used to assist with the prioritization of IRIS scheme improvements.

### **8.5. Scheme Manager – Processes for Accreditation and Oversight of IRIS Audit Companies (ISO/IEC 17011:2017 section 7 Applies)**

In addition to ISO/IEC 17011:2017 generic requirements stated above, the Scheme Manager shall adhere to the following scheme-specific IRIS requirements.

#### **8.5.1. Audit Company - Accreditation Requirements (ISO/IEC 17011:2017 section 7.1 applies)**

In order to be eligible for accreditation within the IRIS Scheme, an Audit Company shall

- Comply with these General Requirements, in particular section 7, above;
- Participate fully and cooperatively in the IRIS Conformity Monitoring and Integrity Program;
- Release IRIS Scheme data and information to the Scheme Manager as required within these General Requirements, or as may be requested from time to time (refer to 2.5 above);
- Promptly pay all relevant fees for Audit Company accreditation and personnel registration.

#### **8.5.2. Audit Company - Application for Accreditation (ISO/IEC 17011:2017 section 7.2 applies)**

An Audit Company reviews availability of opportunities on the [IRIS Scheme Manager](#) web site and, if it considers itself potentially capable, submits an application the Scheme Manager.

Applicant Audit Company is required to demonstrate effective management and control of processes potentially impacting IRIS scheme integrity and quality. This is achieved by demonstrating conformity to these General Requirements, initially by submission of requisite documentation for review and subsequently other oversight by the Scheme Manager, including monitoring visits in the designated geographical region(s).

Scheme Manager reviews application and responds to Audit Company within 10 business days indicating whether AC is eligible to pursue accreditation.

**8.5.3. Resource Review**  
**(ISO/IEC 17011:2017 section 7.3 applies).**

No additional requirements apply.

**8.5.4. Preparation for Accreditation Audit**  
**(ISO/IEC 17011:2017 section 7.4 applies)**

When an Audit Company seeks accreditation for a geographic scope that is new to the IRIS scheme, (and in other situations, as deemed necessary by the Scheme Owner, Scheme Manager, or assigned Lead Auditor), Scheme Manager shall consult with Scheme Owner (and, where necessary, other interested parties) to gain a better knowledge and understanding of the specific risk characteristics of the Labour Recruitment industry within that geographic scope. Scheme Manager shall plan and prepare for subsequent oversight audits in accordance with the information provided.

**8.5.5. Review of Documented Information**  
**(ISO/IEC 17011:2017 section 7.5 applies)**

Scheme Manager shall ensure that Audit Company's documented information provides confidence that Audit Company understands, and demonstrates commitment to, IRIS Scheme requirements (including specific variances from other similar ISO/IEC 17021-based schemes) in accordance with these General Requirements and other associated documents.

Scheme Manager shall provide Audit Company results of the documentation review within 30 days of confirmation of satisfactory receipt of all requested information.

**8.5.6. Preliminary Oversight Audits**  
**(ISO/IEC 17011:2017 section 7.6 applies)**

Following a completion of a satisfactory documentation review (above – including Audit Company's responses, where required), Scheme Manager shall perform a preliminary assessment of Audit Company's conformity to IRIS Scheme Requirements by conducting office and witness audit(s) reflecting the Audit Company's requested scope of application and its associated risks.

- 8.5.6.1.** Scheme Manager shall provide Audit Company results of the preliminary oversight audits within 30 days of confirmation of satisfactory receipt of all requested information (including the receipt of Audit Company audit reports and/or other information requested of Audit Company subsequent to the oversight audit activities)

#### **8.5.7. Accreditation Decision-Making (ISO/IEC 17011:2017 section 7.7 applies)**

In addition to the requirements of ISO/IEC 17011:2017 section 7.7, when decision-making is related to initial accreditation, re-accreditation, or extension-to-scope accreditation, information provided for consideration shall include a description of the Audit Company's processes for audit program planning (including development of IRIS Certification Program Plans - section 3.4, above refers).

- 8.5.7.1.** Unacceptable performance and/or serious infringements of IRIS Standard and/or serious infringements of these General Requirements shall result in deferment of any accreditation and/or may lead to suspension of the Audit Company's prior accreditation. Unacceptable performance and/or serious infringements include, but are not limited to:
- Fraudulent behaviour of any sort
  - Systemic or negligent disregard of the IRIS General Requirements
  - Failure to provide reliable and up-to-date audit and certification results and data in a timely manner
  - Failure to communicate and/or invoke in a timely manner IRIS scheme requirements (including changes) to its certified and applicant clients
  - Misleading or false communication and/or claims with respect to IRIS Certification, including misuse of logos and marks
  - Inadequate internal commitment, management control or impartiality, including failure to respond in an appropriate and timely manner to Scheme Manager and/or Scheme Owner requests
  - Failure to adequately address one or more serious technical failures (including inadequate complaint response; use of non-qualified auditors; etc.).
  - Failure to adequately address a number of minor technical failures
  - Failure to promptly pay fees
  - Activities that potentially bring the scheme, Scheme Manager, or Scheme Owner into disrepute

- 8.5.7.2.** Scheme Manager shall provide Audit Company the outcome of the accreditation decision-making process within 60 days of providing Audit Company with the results of the preliminary oversight audits.

#### **8.5.8. Accredited Audit Company Information (ISO/IEC 17011:2017 section 7.8 applies)**

When the Audit Company has met all defined requirements, the Scheme Manager confirms accreditation of the Audit Company and publishes related information on the [IRIS Scheme Manager](#) web site.

- 8.5.8.1.** In addition to information required by ISO/IEC 17011:2017 paragraph 7.8.3a, Scheme Manager publishes the following:
- Geographic scope of accreditation granted for performing IRIS Certification activities

#### **8.5.9. Audit Company - Accreditation Cycle and Oversight Methodology (ISO/IEC 17011:2017 section 7.9 applies)**

The accreditation cycle for IRIS Audit companies shall be **five years**. During this period, the Scheme Manager applies the IRIS Conformity Monitoring and Integrity Program to oversee the activities and performance of accredited Audit Companies. The type and degree of oversight undertaken by the Scheme Manager shall be dependent upon the demonstrated degree of conformity and competence demonstrated by the Audit Company; the number of IRIS certificates issued; the geographic scope of operation; and other risk factors that may be identified from time to time.

**8.5.9.1.** As a minimum, on an annual basis, the Scheme Manager shall conduct oversight audits as follows:

- At the location(s) from where Audit Company manages its audit processes and certification decision-making to verify conformity of and effectiveness of overall management system controls (Certification Head Office Audit);
- At a representative sample of any secondary office that provide local IRIS-related services to verify conformity of services provided (Regional Office Audits);
- At a representative sample of IRIS audits being undertaken by the Audit Company at its Labour Recruiter client's premises to verify conformity of audit practices (Witness Audits).

**8.5.9.2.** Additional monitoring, investigation and evaluation shall be conducted in the case of:

- alleged or confirmed fraud
- repeated, poor performance during routinely scheduled audits
- poor timeliness in demonstrating conformity to scheme requirements
- outstanding payment of invoices
- any pertinent complaints or other external allegations of poor performance
- complaints received regarding practice of IRIS certified Labour Recruiters which imply poor Audit Company quality or integrity
- other issues that may impact the quality or integrity of the IRIS scheme

**8.5.9.3.** In addition to the routinely occurring oversight audits above, the Scheme Manager may also from time to time (as appropriate, and at its sole discretion), conduct any the following Audit Company oversight activities:

- Report Evaluations of Audit Company audit report and records
  - routine non-technical evaluations of AC reports to determine completeness and adherence to general process expectations
- Desk Top Reviews of Audit Company audit report and records
  - in-depth technical reviews to determine process conformity and adherence to specific technical expectations
- Duplicate Audit of a registered certificate holder (on-site where the Audit Company's audit process has been completed)
  - to verify that the conclusions of an Audit Company's audit report conclusions are accurate
- Investigation of complaints – Initiation and monitoring of appropriate actions



- to ensure that grievances received from all sources regarding IRIS audit and certification processes are investigated and addressed in a timely and effective manner
- Specialized Investigative Visit and/or Market Surveillance Monitoring
  - to determine the existence or prevalence of issues occurring (usually in response to broad geographical or industry sector grievances or concerns)

#### **8.5.10. Extending Scope of Accreditation (ISO/IEC 17011:2017 section 7.10 applies)**

Scheme Manager shall respond in a timely manner to an Audit Company's request for an extension-of-scope-of-accreditation to provide IRIS Certification services in a new geographical location. Extension-to-scope-of-accreditation techniques applied by the Scheme Manager shall be commensurate with the risks involved with locations or activities to be covered, but shall include, as a minimum, review of the qualifications and competence of individuals who are to undertake Audit Company audit and certification activities potentially impacted by the revised scope and Audit Company processes which may be impacted.

#### **8.5.11. Audit Company Sanctions, Suspension, Scope Reduction and Withdrawal (ISO/IEC 17011:2017 section 7.11 applies)**

Sanctions may be invoked at any time as a result of the outcome of the IRIS Conformity Monitoring and Integrity Program, complaint investigation, whistleblowing etc. Unacceptable performance and/or serious infringements that may lead to sanctions are the same as those defined above in section 8.5.7. "Accreditation Decision-Making".

The Scheme Manager shall be notified of all occurrences and shall determine the appropriate course of action and severity of sanctions on a case-by-case basis. Sanctions may include any of, or any escalation of, the following:

- Intensified Conformity Monitoring and Integrity Program activity and/or oversight;
- Suspension (partial or global);
- Reduction of scope of accreditation;
- Withdrawal of accreditation.

Terms of a suspension and terms for the lifting of suspension shall be determined by the Scheme Manager and communicated in writing to the Audit Company. In determining appropriate actions, the Scheme Manager considers the reason for suspension to determine whether the validity of existing certificates issued by the Audit Company may be affected.

Typically, when an Audit Company is suspended, it is forbidden from conducting any new audit or certification activity. In order to lift suspension, the Audit Company shall provide Scheme Manager with an action plan, and subsequently provide evidence of effective implementation of the elements of that plan within a specified period. Any costs associated with sanctions shall be borne by the Audit Company.

Scheme Manager shall notify Scheme Owner, and make public, any Audit Company suspension (partial or global), reduction of scope of accreditation, or withdrawal of accreditation.

#### **8.5.12. Audit Company Complaints**



**(ISO/IEC 17011:2017 section 7.12 applies)**

In addition to meeting the requirements of ISO/IEC 17011:2017 section 7.12, the Scheme Manager shall ensure that handling of complaints it receives regarding the quality or integrity of Audit Company accreditation, or Labour Recruiter certification, additionally meets the requirements of the overarching IRIS Monitoring and Compliance Mechanism MCM.

**8.5.13. Audit Company Appeals****(ISO/IEC 17011:2017 section 7.13 applies)**

Appeals against sanctions issued by the Scheme Manager must be received in writing to the Scheme Manager within 5 working days after the receipt of a sanction notification. The Scheme Manager shall evaluate the appeals within 30 days of receipt.

Scheme Manager shall notify Scheme Owner of any appeal.

**8.5.14. Records on Audit Companies****(ISO/IEC 17011:2017 section 7.14 applies)**

No additional requirements apply.

**8.6. Scheme Manager – Processes for Information Management****(ISO/IEC 17011:2017 section 8 Applies)**

In addition to ISO/IEC 17011:2017 generic requirements stated above, the Scheme Manager shall adhere to the following scheme-specific IRIS requirements.

**8.6.1. Confidential information****(ISO/IEC 17011:2017 section 8.1 Applies)**

Except as provided for under 2.5, above, all specific Audit Company, Audit and Certification information shall be maintained in confidence, and may only be made available to the Scheme Manager, Scheme Owner and (on a need-to-know-basis only) to the overarching IRIS Monitoring and Compliance Mechanism MCM. Anonymized information obtained may be published in the public domain from time to time.

**8.6.2. Publicly Available Information****(ISO/IEC 17011:2017 section 8.2 Applies)**

No additional requirements apply.

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## 9. DOCUMENT CHANGE RECORD

Revision Status	Changes introduced	Date of Change
Issue 1.0	IRIS Scheme Soft Launch	December 4, 2018
Issue 2.0	Removed. See prior version for full change record.	October 1, 2019
Issue 2.1	Removed. See prior version for full change record.	January 8, 2021
Issue 3.0	<p>Removed the concept of 'Management System Nonconformity'. Instead:</p> <ul style="list-style-type: none"> <li>a) Consideration of Management System performance when making certification decisions is now based on a 'management system maturity rating' scale (driven by the indicators and scoring algorithms embedded within the IRIS Audit Tool)</li> <li>b) The concept of Management System Improvement Opportunities is introduced to drive continual improvement in lieu of management system nonconformities.</li> <li>c) Clarified nonconformity differentiation ('partial')</li> <li>d) Modifications to the number of acceptable/unacceptable 'Minor' nonconformities in table 4.3.1</li> </ul> <p>The above changes are reflected in the following paragraphs: 4.3.1.4.2, 4.3.1.4.2, 4.3.3.2, Table 4.3.1, Table 4.3.2.</p>	October 21, 2021
Issue 4.0	<p>Amended Certification Thresholds to define Scheme Owner's revised certification expectations – as reflected in the revised IRIS Audit tool. (Table 4.3.1 – Certification Status)</p> <p>Amended criteria to reflect 'management system' rating protocols embedded within the latest IRIS Audit Tool. (Table 4.3.1 – Certification Status)</p> <p>Disallow 'outsourcing' (subcontracting) of IRIS Certification activities (7.4.4 d added)</p> <p>CSPMS now referred to (more accurately) as IRIS 'Certification Scope, <u>Profile</u>, and Management Systems' (document) (Throughout)</p> <p>Other minor clarification and changes to terminology to reflected latest IRIS Audit Tool and IRIS Certification and Audit Protocols requirements.</p>	January 16, 2022
Issue 4.1	<p>Added immediate AC suspension for integrity breaches (7.1.1)</p> <p>Clarified and added explanatory notes to 'Business Partner' definition (1.3.9).</p> <p>Added 'misuse of marks' to MINOR Nonconformity Findings (4.3.1.4.5)</p> <p>Clarification of issues to be addressed in the Certification Program Plan (3.5.3)</p>	January 17, 2023

	<p>Added 'CSPMS' maintenance and availability commitment to AC-LR Contract (Note: this requirement will not apply retroactively before the date of this publication)</p> <p>Audit Findings for 'Management System' Principle/Criteria B1 typographical error fixed to show 'Major' Nonconformity (Was 'Minor' Nonconformity) for management system maturity rating of '0'. (4.3.1.4.2).</p> <p>New clause added: 4.2.3.Special Audits (ISO/IEC 17021-1:2015 sections 9.6.4 applies)</p> <p>Hyperlinks to document library inserted for newly issued</p> <ul style="list-style-type: none"> <li>• IRIS Nonconformity Form (4.3.2.1 &amp; 4.3.3.1)</li> <li>• IRIS Corrective Action Follow-up Form (4.3.3.3)</li> </ul> <p>Clarified 7.1.7 (Risk Based Approach) to specifically include individual 'Labour Recruiter risks'</p> <p>Amended paragraph 8.5.9 (Scheme Manager Requirements - Audit Company - Accreditation Cycle and Oversight Methodology Accreditation cycle for IRIS Audit companies shall be <b>five</b> years. (was three years).</p> <p>Other minor clarifications and typographical changes</p>	
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## ANNEX 1: AVAILABILITY OF IRIS DOCUMENTATION, DATA, AND INFORMATION

Key: F = Full access; A = Access for Audit/Review Purposes Only; P = Publicly Available

Scheme Process & Data					
Accessible to:	Labour Recruiter	Audit Company	Scheme Manager & Scheme Owner	Public	Further Information
Labour Recruiter IRIS Profile – Outline	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site</a> .
Labour Recruiter IRIS Profile – Details (CSPMS)	F	F	A		
Labour Recruiter Operational Processes	F	A	A		
Labour Recruiter Complaint Processes	P	A	A		
Labour Recruiter Certification Information & Data – Outline	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site</a> .
Labour Recruiter Certification Information & Data – Details	F	F	A		
Labour Recruiter Business & Transactional Information & Data	F	A	A		
Audit Company IRIS Profile	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site</a> .
Audit Company Audit and Certification Operational Processes – Outline	P	P	P	P	Publicly Available via Audit Company web site, or upon request.
Audit Company Audit and Certification Operational Processes – Details		F	A		
Audit Company Complaint Processes	P	P	P	P	Publicly Available via Audit Company web site, or upon request.
Audit Company Accreditation Information & Data – Outline	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site</a> .
Audit Company Accreditation Information & Data – Details		F	F		
Audit Company Business & Transactional Information & Data		F	A		
Scheme Manager IRIS Profile	P	P	P	P	Publicly Available via IRIS Scheme Manager web site

Scheme Manager Operational Processes - Outline	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site.</a>
Scheme Manager Operational Processes – Details			F		
Scheme Manager Complaint Processes	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site.</a>
Scheme Manager Business & Transactional Information & Data			F		
Scheme Owner Operational Processes – Outline	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Owner web site.</a>
Scheme Owner Operational Processes – Details			F		
Scheme Owner Monitoring and Compliance Mechanism MCM Processes	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Owner web site.</a>
Scheme Owner Business & Transactional Information & Data			F		
Scheme Owner Monitoring and Compliance Mechanism MCM Information & Data	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Owner web site.</a>
Scheme General Requirements	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site.</a>
Scheme Detailed Operational Requirements	F	F	F		
Scheme Overall results, data and trends	P	P	P	P	Publicly Available via <a href="#">IRIS Scheme Manager web site.</a>