



ISAB Guidance on: The Witnessing of CAB Audits by an Accreditation Body

Document Reference	Issue Date
ISAB-AAPG Witnessing Audits	23 July 2026

1. Introduction

The witnessing of Conformity Assessment Body (CAB) audits on their clients by Accreditation Bodies (ABs) is valuable for:

- verifying, on site, the effectiveness of a CAB's programmes and procedures (and especially with regard to their assignment of competent audit teams).
- observing the CAB's auditors, as they perform a registration/ certification, a re-certification, or a surveillance audit, to evaluate if they:
 - comply with the CAB's procedures,
 - adequately address the requirements of: Certification Criteria, ISO/IEC17021, Relevant ISAB Mandatory and Informative documents, and, as applicable, any relevant sector specific requirements.

This will enable an AB to determine whether the CAB is effective in controlling its decision making and certification processes, and thus to assess the CAB's capability to perform accredited certification.

2. Pre-audit preparations

In order to be able to witness audits, an AB will need to have formal arrangements in place with its accredited CABs, and with those CABs that are in the process of applying for accreditation. These arrangements should ensure that the AB has the right to witness CAB audits, as it sees necessary, and that the CABs have arrangements in place with their clients to permit such witnessing to be conducted.

These arrangements may need to address issues such as confidentiality, between the AB and the CAB, and between the AB and the CAB's clients.



INTERNATIONAL STANDARDS & ACCREDITATION BOARD

When deciding if a CAB needs to have an audit witnessed, the AB should take into account factors such as:

- the CAB's overall performance,
- the risks associated with the industry and service sectors that the CAB operates in,
- feedback from interested parties,
- the results of the CAB's internal audits, etc.

The AB should also ensure that their presence at the audit is cost effective and try to minimise impact on the CAB and its client.

When planning to witness an audit, the AB should ensure that it has relevant information concerning the CAB. This should include, as appropriate, details of:

- the organizational structure of the CAB,
- its quality management system,
- its operating procedures,
- the results of previous audits on the CAB,
- complaints brought to the attention of the CAB, and to the AB itself.

Additionally, in relation to witnessing a specific audit (on a specific CAB and a specific client of the CAB), the AB should also ensure that it has details of:

- the CAB's audit plan,
- background information on the CAB's audit team,
- the history of the CAB's client, and the client's quality management system,
- logistical information for the audit (e.g. the date and location of the audit).

An AB should have a formal process for the selection and appointment of its own auditors. An AB should only assign a competent auditor, or auditors, to witness CAB audits. The AB auditor(s) should have:

- an appropriate knowledge of the CAB's client's type of business, processes and products,
- a general understanding of the kinds of regulations the client's products have to comply with, and
- the ability to witness an audit and to collect any necessary information.

In advance of witnessing an audit, the AB should inform the CAB of:

- its objectives for witnessing the audit,
- its assessment process,
- its feedback and reporting processes.

The AB should also agree with the CAB the role that its auditor(s) will play during the audit, and on how this will be presented to the client.

It should be made clear to all interested parties that the AB's auditors, when witnessing the CABs' audits, are not directly auditing the CAB client's quality management system, as this is



INTERNATIONAL STANDARDS & ACCREDITATION BOARD

the sole duty and responsibility of the CAB.

3. During the audit

During their witnessing of CAB audits, AB auditors should limit their participation in the audits to that of an observer; they should not interfere in a CAB's conduct of its audit on a client. In addition, they should ensure that they do not influence the outcome of a CAB audit, in any manner.

However, this should not prevent the AB assessors from being pro-actively involved in the process, by arranging intermediate briefings, or by asking for clarification and additional information, etc. Clarifications, exchange of information, briefings etc. should preferably take place during planned breaks or separate meetings; however it may also be necessary to conduct them during ad hoc breaks or meetings. They should be conducted away from the presence of the CAB's client, to preserve AB to CAB confidentiality.

Note: any information collected during the witnessing of an audit is confidential and has to be treated by the ABs' auditors and staff accordingly.

AB auditors should avoid providing any opinions to the CAB, or to its client, while the audit is being conducted.

To be of maximum value, the AB auditors should attempt to cover the CAB's full client audit process at site.

AB auditors should try to ensure that their presence and witnessing activity is not perceived as interference by clients, and is instead viewed positively.

4. Feedback and reporting of results

Feedback on the CAB's performance should only be given to the CAB audit team when the audit is completed. Where possible, this should be planned to occur at the end of the audit, at the client's premises (away from the presence of the client).

The AB's auditors should produce a report on the witnessing of the audit only after receipt and review of the CAB's own audit report.

The report on the witnessing of the audit should avoid repeating details of the performance of the client's QMS and on the findings raised by the CAB audit team, as these should already be included in the CAB's report.

However, there may be situations where observations are made during the witnessing process, and which are not reported by the CAB's audit team, (e.g. that regulatory requirements are being contravened by the client or are not properly addressed by the client's QMS); the AB's



INTERNATIONAL STANDARDS & ACCREDITATION BOARD

auditors should inform the CAB's audit team about such observations during the post-audit feedback session, and should also record them as nonconformities in their report on the witnessing of the audit.

Where an AB's report includes nonconformities, it should require that action is taken by the management of the CAB to address the issues raised.

Similarly, if the observations clearly indicate that the auditing of the client's QMS shows such major deficiencies as to doubt the validity of the CAB's certification process (particularly during surveillance or re-certification audits), this should be properly recorded in the AB's report and duly addressed to the management of the CAB; additionally it should be submitted for further consideration and action within the AB.