

INFORMATION FOR EXTERNAL PROVIDERS
Interpretation *bugs* in ISO 9001:2015 standard
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The ISO 9001 standard, in its revision of 2015, presents some content items that have been the subject of different interpretations by some parties involved in the application of the standard. One of the subjects that has caused some interpretive divergence is "8.4.3 Information for external providers", item "e".

In its text, the standard determines (the full transcript of paragraph 8.4.3 is done to contextualize the argument of item "e"):

"8.4.3 Information for external providers

The organization shall ensure the adequacy of requirements prior to their communication to the external provider.

The organization shall communicate to external providers its requirements for:

a) the processes, products and services to be provided;

b) the approval of:

1) products e services;

2) methods, processes and equipment;

3) the release of products and services;

c) competence, including any required qualification of persons;

d) the external providers' interactions with the organization;

e) control and monitoring of external providers' performance to be applied by the organization;

f) verification or validation activities that the organization, or its customers, intends to perform at the external providers' premises."

APCER (Portuguese certification entity) refers, in its interpretation guide of the standard, referring to the mention item "e", that the information to be communicated must include *"the control and monitoring of the performance of the external provider that the organization will apply"*.

APCER claims that the demonstration of conformity in this respect is made as follows:

"The organization demonstrates the communication with the external providers regarding the processes, P&S they provide, ensuring the communication of the requirements determined in this section, to the extent applicable.

Where relevant this communication is supported on documented information. Examples: orders, contracts, tender documents, trades, e-mails, meeting minutes with providers and any type of documented information communicated to the provider regarding the method to be implemented in evaluating their performance. "

I should note that it mentions various types of documented information to be used *"regarding the method to be implemented in evaluating its (external providers) performance"*.

ISO / TS 9002 - First edition 2016-11-01 defines the following as a form of compliance with item "e":

"The performance of external providers needs to be monitored. The type and frequency of the monitoring that the organization will use should be included in the information. This could specify the level of performance that the external provider has to meet, or provide information

relating to how the results of the organization's performance evaluations will be communicated".

This standard goes even further in referring how organizations must comply with the requirement, arguing that the organization can specify the level of performance that the external vendor must achieve or provide information on how the results of the organization's performance evaluation will be communicated.

Thus, we have an interpretative convergence in both interpretative documents in the sense that, apparently, organizations should communicate to their external providers their "evaluation method" to be applied and the "expected performance levels" of the providers, as well as their consequent "results obtained in the evaluation".

However, those two lines of interpretation may be questionable if we put the content of item "e" in a different, more direct and objective form.

Let us make the strictly necessary dialectical synthesis of the content, in order to understand the semantic meaning of the standard narrative.

Let's start with the text of the standard:

*"The organization shall communicate to external providers its requirements for:
e) control and monitoring of external providers' performance to be applied by the organization; "*

Synthesizing, we can say that what the organization must communicate to its external providers boils down to its "requirements for control and monitoring of performance to be applied"

The "requirements for control and monitoring" do not appear to be coincident with the elements focused in the previous interpretations - "evaluation method", "expected performance levels" or "results obtained in the evaluation".

In view of this finding, we may question whether is the standard that does not clearly specify the requirement or there is an abusive interpretation by some of the parties about what the true spirit of the standard is.

The first hypothesis does not seem real to me, just because the text of the standard is very specific regarding its semantic meaning.

Taking that in consideration, it is clear that the standard defines the need for the organization to communicate its own requirements to its external providers, regarding the control and monitoring of their performance. In other words, in order for the organization to control and monitor its external providers, it has to communicate what it will require from them for such purpose.

An organization wishing to control and monitor an external provider hired to perform night surveillance at its premises may demand, as a requirement, that the external provider's surveillance staff have to register in its electronic equipment in the different buildings or divisions whenever they walk through.

An organization wishing to control and monitor an external contractor hired to construct a reinforced concrete building may demand, as a requirement, that the construction company has to inform in advance when the concrete is going to be pored, in order to do an inspection of the reinforcing structure.

An organization wishing to control and monitor an external provider hired to develop specific software may demand, as a requirement, having at any time free access to the computers of the dedicated programmers.

We also have a future sense given to the need to communicate the requirements for control and monitoring to support the above logic. When the standard establishes that the organization must communicate "*its requirements for control and monitoring of external providers' performance to be applied by the organization*", it gives a future perspective to the control and monitoring action, that is, the organization must communicate in advance what it will require from the external provider in order to control and monitor the performance of the last. This temporal perspective contradicts the interpretative meaning of communicating the "results obtained in the evaluation".

This temporal need of the organization to communicate to external providers its requirements for the control and monitoring of their performance means that the same communication has to be carried out during the negotiation or contracting phases of the purchase, since it is not after that the organization can present (new) requirements to the external providers. Moreover, this seems to be the main reasoning that the standard intends to bring to organizations. The organization must communicate to external providers, before establishing purchasing agreements with them, what it will need from them, in order to be able to control and monitor them.

Finally, it seems clear that "the requirements for control and monitoring", as set out in the standard, do not coincide with interpretations related to "evaluation method", "expected performance levels" or "results obtained in the evaluation". Control and monitoring may be carried out without any formal evaluation, any particular method of assessment, or any consequent determination of results.

This white paper reflects my interpretation of the requirement of the standard under consideration, in the light of different interpretations by parties involved in the application process of the standard that seem to detract from the spirit of the standard, which does not invalidate a deeper discussion of the topic.

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