

DIGITAL GOVERNANCE COUNCIL

Validation and Verification Quality Manual and Directives

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CONSEIL DE
GOUVERNANCE
NUMÉRIQUE



DIGITAL
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1. Scope

The Digital Governance Council (DGC) Validation and Verification Quality Manual specify the principles and requirements for the competence, consistent operation and impartiality of performing validation and verification as conformity assessment activities.

2. Definitions

For the purposes of this Manual, the following terms and definitions apply, including those given in ISO/IEC 17029, Conformity assessment — General principles and requirements for validation and verification bodies.

3. Referenced Publications and Documents

The following referenced documents are indispensable for the application of the DGC Validation and Verification Quality Manual. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document applies.

- Digital Governance Council Charter and Terms of Reference
- Organization Chart and Committee Governance
- ISO/IEC 17029, Conformity assessment — General principles and requirements for validation and verification bodies.
- PRO 1, Impartiality Assurance Committee – Constitution, Roles and Responsibilities
- POL 1, Impartiality Policy
- Procedure for effective control of validation and verification activities delivered by entities under its operational control
- Procedure for personnel and training
- Procedure for managing competence of personnel
- Procedure for procurement of externally products and services
- Procedure for review of request for validation and verification
- Procedure for planning of validation and verification
- Procedure for execution of validation and verification activities
- Procedure for review and reporting
- Procedure to receive, evaluate and make decisions on appeals
- Procedure to receive, evaluate and resolve complaints
- Procedure for use of marks by client
- Procedure for management review
- Procedure for internal audit

- Procedure for identification and management of nonconformities and corrective action
- Procedure for risk assessment
- Procedure for document and data control
- Procedure for control of records
- Documentation structure and codification system
- Impartiality policy
- Confidentiality policy
- Operational control plan
- Competence requirements
- Impartiality and confidentiality agreement
- Impartiality check report
- Control report
- Training Calendar
- Training Report
- Induction Training Report
- Job Description and Specification
- Skill Matrix
- Training Effectiveness check report
- Interview report
- Employee competence report
- Competence assessment report
- Purchase Order
- Indent (Purchase requisition)
- Supplier registration form
- Approved External Providers List (Approved Vendor List)
- Supplier Evaluation Report
- Inspection Report

- Sub-contractors and External service provider's agreement
- Validation and Verification request
- Planning register
- Client feedback
- Validation and Verification agreement
- Validation and verification plan
- Validation and verification execution report
- Calibration status of equipment
- Equipment History Card
- Validation and verification review and decision report
- Validation and verification statement
- Appeal report
- Appeal register

4. Principles

4.1 General

The principles specified in Section 4.2 of this Manual provide the basis for the requirements specified in this Manual. These principles are applied as guidance for decisions that sometimes need to be made for unanticipated situations.

The overall aim of validation and verification is to give confidence to all parties that a validated or verified claim fulfils the specified requirements. The value of validation and verification is the confidence that is established by an impartial evaluation by the Digital Governance Council as a validation and verification body.

The interested parties of validation and verification include, but are not limited to:

- a. Our clients
- b. Program owners
- c. Users of the validated and verified claims
- d. Regulatory authorities.

4.2 Principles for DGC and the validation and verification process

This Quality Manual establishes a validation and verification process for DGC that ensure the following principles:

- a. An **evidence-based approach** to decision making for reaching reliable and reproducible validation and verification conclusions and be based on sufficient and appropriate objective evidence. The validation

and verification statement shall be based on evidence collected through an objective validation and verification of the claim.

- b. **documentation** establishing the basis for the conclusion and decision regarding conformity of the claim with the specified requirements.
- c. **Fair presentation** of validation and verification activities, findings, conclusions and statements, including significant obstacles encountered during the process, as well as unresolved, diverging views between DGC and the client are truthfully and accurately reflected.
- d. DGC decisions are based on objective evidence obtained through the validation and verification process and are not influenced by other interests or parties to maintain **impartiality** of the process. Threats to impartiality include the following:
 - Self-interest: Threats that arise from a person or body acting in their own interest. A concern related to validation and verification, as a threat to impartiality, is financial self-interest.
 - Self-review: Threats that arise from a person or body reviewing the work done by themselves.
 - Familiarity (or trust): threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for validation / verification.
 - Intimidation: Threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.
- e. Personnel of DGC have the necessary competence, knowledge, skills, experience, training, supporting infrastructure and capacity to effectively perform validation and verification activities.
- f. Confidential information obtained or created during validation and verification activities are safeguarded and not inappropriately disclosed to preserve **confidentiality**.
- g. DGC **openness** provides public access to, or disclosure of, appropriate information about validation and verification processes followed and services provided.
- h. DGC clients, and not DGC, are responsible for the claim and its conformity with the applicable specified requirements. DGC has **responsibility** to base a validation and verification statement upon sufficient and appropriate objective evidence.
- i. Parties that have an interest in validation and verification can make complaints. These complaints are appropriately managed and resolved. DGC **responsiveness to complaints** is necessary to demonstrate integrity and credibility to all users of validation and verification outcomes.
- j. DGC's **risk-based approach** takes into account the risks associated with providing competent, consistent and impartial validation and verification. Risks related to validation and verification activities are identified and addressed through appropriate mitigation. Risks can include, but are not limited to, those associated with:
 - the objectives of the validation and verification and the program requirements
 - competence, consistency and real as well as perceived impartiality
 - legal, regulatory and liability issues
 - the client organization, where validation and verification is being carried out, and its management system, operating environment, geographic location, etc.

- the susceptibility of any parameter included in the claim to generate a material misstatement, even if there is a control system implemented
- the level of assurance to be achieved and the corresponding evidence-gathering used in the validation and verification process
- perception of interested parties
- misleading claims or misuse of marks by the client
- risk control and opportunities for improvement

5. General Requirements

5.1 Legal entity

The Digital Governance Council is a Canadian not-for-profit member-led organization that works to provide Canadians with confidence in the responsible design, architecture and management of digital technologies through four streams of activity:

- a. Convening an executive forum for members to share best practices, identify digital governance gaps and prioritize collective action.
- b. Partnering to prove out new technologies and deliver proofs of concept and common building blocks to manage risks and opportunities associated with the use of digital technologies.
- c. Establishing the Council's Digital Governance Standards Institute, independent of the Council, to develop technology governance standards.
- d. Conducting validation and verification conformity assessment activities against digital governance standards.

5.2 Responsibility for validation and verification statements

The DGC CEO is responsible and retains authority for DGC validation and verification statements.

5.3 Management of impartiality

DGC shall undertake validation and verification activities impartially and is responsible for the impartiality of its validation and verification activities. DGC shall not allow commercial, financial or other pressures to compromise impartiality. DGC CEO is responsible to monitor DGC validation and verification activities and its relationships to identify threats to its impartiality, including relationship of its personnel.

NOTE: Relationships are based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding). However, such relationships do not necessarily present DGC with a threat to impartiality.

Threats to impartiality shall be identified and shared with the DGC CEO. The identification of threats to impartiality includes balanced consultation by the DGC CEO with appropriate interested parties, with no single interest predominating, to advise on matters affecting impartiality including openness and public perception. Consultations with appropriate interested parties are held to advise on matters affecting impartiality. A committee is hereby established, known as the Impartiality Assurance Committee to safeguard the independence of the validation and verification process in accordance with ISO/IEC 17029.

If a threat to impartiality is identified, its effect shall be either eliminated or minimized in consultation with the Impartiality Assurance Committee so that impartiality is not compromised.

DGC top management is committed to impartiality and its CEO shall maintain a publicly available impartiality policy outlining its commitment and understanding of the importance of impartiality in carrying out its validation and verification activities, managing conflicts of interest and ensuring objectivity.

Review and decisions shall be made by personnel different from those who carried out the validation and verification execution in accordance with Section 9.1 d) of this Manual.

When providing both validation and verification to the same client, DGC CEO shall consider the potential threat to impartiality (e.g., self-review and familiarity) and manage this risk accordingly.

DGC shall not provide any consultancy services. Where the relationship between DGC and another body that provides consultancy poses an unacceptable threat to DGC impartiality, DGC shall not provide validation and verification activities to clients who have received consultancy relating to the same claim, including potential clients with which DGC is pre-engaged. DGC shall request from the client details of consultancy organizations used for such activities.

DGC activities shall not be marketed or offered as linked with the activities of any organization that provides consultancy. DGC CEO shall act when it is made aware (e.g., via a complaint) of inappropriate links with or announcements by any consultancy organization stating or implying that validation and verification would be simpler, easier, faster or less expensive if DGC were used. Also, DGC shall not state or imply that validation and verification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

DGC CEO shall act to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations, including the actions of those bodies to which validation and verification activities have been outsourced.

5.4 Liability

DGC CEO shall evaluate the risks arising from its validation and verification activities in accordance with Section 11.5 of this Manual, including having adequate insurance to cover liabilities arising from its activities in each validation and verification programs and the geographic areas it operates.

6. Structural Requirements

6.1 Organizational structure and top management

A branch is hereby established, known as the Validation and Verification Conformity Assessment Branch, to maintain the capability to perform its validation and verification activities while safeguarding impartiality. The Validation and Verification Conformity Assessment Branch is a separate, independent organizational unit of the Digital Governance Council, with no authorities nor direct responsibilities in the Council's standards development activities through the Digital Governance Standards Institute.

DGC, including its employees, contractors, and subcontractors, shall not engaged in any activities that may conflict with their independence of judgment, integrity and safeguard in relation to the validation and verification activities.

DGC CEO is responsible to document DGC's organizational structure, duties, responsibilities and authorities of management and other personnel involved in the validation and verification activities, and any committees.

DGC CEO is the overall authority and person responsible for each of the following:

- a. development of policies and establishment of processes relating to its operations;
- b. supervision of the implementation of the policies and processes;
- c. ensuring impartiality;
- d. supervision of its finances;

- e. development of validation and verification activities and requirements
- f. performance of validation and verification activities;
- g. decisions and issue of validation and verification statements;
- h. delegation of authority to committees or individuals, as required, to undertake defined activities on its behalf;
- i. contractual arrangements;
- j. personnel competence requirements;
- k. responsiveness to complaints and appeals;
- l. management system of the validation/verification body;
- m. provision of adequate resources for validation/verification activities.

6.2 Operational control

In considering risk that validation and verification activities pose to the competence, consistency and impartiality of DGC, all validation and verification activities conducted by entities under the DGC's operational control, including its offices, partnerships, agents, franchisees, etc., irrespective of their legal status, relationship, or geographical location, shall comply with the requirements of this Manual. The CEO or CEO designated representative shall have the authority to enforce compliance to the requirements of this Manual and to take necessary actions to address any concerns or deficiencies identified in validation and verification activities.

NOTE: The DGC CEO has discretion in consultation with the Impartiality Assurance Committee, as required in accordance with this Manual, on its processes, sectors of validation and verification activities, competence of personnel, lines of management control, reporting and remote access to operations, and records.

7. Resource Requirements

7.1 General

DGC CEO shall maintain access to adequate numbers of personnel, facilities, equipment, systems and support services that are necessary to perform its validation and verification activities.

7.2 Personnel

The DGC CEO shall require all personnel involved in validation and verification activities to enter into a legally enforceable agreement by which the personnel commit themselves to:

- a. comply with the processes and instructions of DGC, including those relating to impartiality and confidentiality
- b. declare any prior and/or present association on their own part, or on the part of another person or organization with which they have a relationship (e.g., a family member or their employer), with a client of DGC
- c. reveal any situation known to them that can present them or DGC with a perceived or actual conflict of interest.

NOTE: Personnel include those persons that are employees, directors and committee members of the body, and any contracted persons that are used by the body to undertake validation / verification activities.

The DGC CEO shall use this information as input into identifying threats to impartiality raised by the activities of such personnel, or by the persons or organizations related to them.

All personnel of DGC, either internal or external, that could influence the validation and verification activities, shall act impartially and this provision shall be reflected in the legally enforceable agreement.

Personnel who have provided consultancy on the claim to be the object of validation and verification shall not perform validation and verification activities in relation to their previous involvement.

Personnel, including any committee members, contractors, personnel of external bodies, or individuals acting on the behalf of DGC, shall keep all information obtained or created during the performance of validation and verification activities of DGC confidential. This provision shall be reflected in the legally enforceable agreement.

DGC CEO shall be responsible for communicating to personnel their duties, responsibilities and authorities.

7.3 Management process for the competence of personnel

The DGC CEO is responsible for managing competence of its personnel involved in the validation and verification activities. The DGC CEO shall:

- a. Determine the criteria for the competence of personnel for each function in the validation and verification process. The criteria include the following:
 - i. the ability to apply generic validation and verification concepts (e.g., evidence gathering, risk, misstatements, level of assurance, materiality)
 - ii. knowledge about the type and typical content of the client's claim
 - iii. knowledge of the program requirements (e.g., competence required for specific validation and verification process)
- b. Identify training needs and provide, as necessary, training on validation and verification processes, requirements, methodologies, activities and other relevant validation and verification program requirements.
- c. Demonstrate that the personnel have the required competence for the duties and responsibilities they undertake.
- d. Formally authorize personnel for functions in the validation and verification process.
- e. Monitor the performance of the personnel.

The DGC CEO shall maintain documented information demonstrating competence of its personnel involved in the validation and verification activities, including relevant education, training, experience, performance monitoring, affiliations, and professional status.

7.4 Outsourcing

In the absence of applicable program prohibitions on outsourcing, DGC may outsource validation and activities in accordance with the following criteria:

- a. DGC shall retain full responsibility for the validation and verification activities performed by subcontractors.
- b. DGC shall not outsource the engagement activities [described in Section 9.1 b) of this Manual] nor the decision on the confirmation of the claim and the issue of the statement [described in Section 9.1 f) of this Manual].
- c. DGC shall have a legally enforceable agreement, including confidentiality and management of impartiality requirements, with each organization that provides outsourced activities.
- d. DGC shall ensure that the organization that provides outsourced activities conforms with the applicable requirements of ISO/IEC 17029, including competence, impartiality and confidentiality and to any applicable program requirements.
- e. DGC shall obtain consent from the client to use the person or organization that provides the outsourced activities.

NOTE: Where DGC engages individuals or employees of other organizations to provide additional resources or expertise, these individuals or employees do not constitute outsourcing provided they are individually contracted to operate under the validation and verification body's management system.

8. Validation and Verification Program

DGC validation and verification program(s) shall be consistent with, and in accordance with the requirements of this Manual.

Each validation and verification program shall contain, as a minimum, the following elements:

- a. Scope of validation and verification
- b. Specific competence criteria for the validation and verification team and DGC
- c. Process for validation and verification
- d. Evidence gathering activities of validation and verification
- e. Reporting of validation and verification

In addition, DGC shall be responsible for defining the level of details of any additional elements included in a validation and verification program beyond the minimum requirements above. DGC may specify the following in accordance with Section 9.1 of this Manual:

- a. Type of claims to be the object of validation and verification, including the requirements against which the claim is to be assessed
- b. The criteria for competence of personnel for the validation and verification team
- c. The process steps to be undertaken as a minimum in conducting the validation and verification
- d. Activities (as per section 9.1 of this Manual) to achieve the intended results
- e. The level of assurance, if required, and the materiality
- f. The evidence gathering activities of validation and verification
- g. The reporting requirements
- h. The review activities including the confirmation that all activities have been completed in accordance with the program requirements
- i. The way in which the results of the validation and verification are to be interpreted and what the consequences are of the results, including that it should be laid down which findings prevent the issuance of a validation and verification statement
- j. The wording used for validation and verification statements, because sector specific terminology is used
- k. Requirements regarding what records DGC should retain as evidence of conducting validation and verification
- l. The validation and verification statement issued based on the evaluation of the claim to be in accordance with the validation and verification carried out

The following may form DGC considerations when developing a program:

- a. The necessity of an impartial monitoring function.
- b. The training needs for personnel on validation and verification processes, requirements, methodologies, activities and other relevant validation / verification program requirements and training provided.
- c. Requirements for monitoring of personnel.
- d. Requirements on personnel, facilities, equipment, systems and support services.
- e. If, and under which conditions, DGC may outsource validation and verification activities.
- f. Additional parameters for the pre-engagement phase, including but not limited to sampling, materiality criteria, quality parameters, timeframes, fees.
- g. Requirements for the validation and verification agreement.
- h. The planning and preparation activities that DGC undertakes before commencing the actual validation and verification activity.
- i. Arrangements to be made if there are facts discovered after issue of the validation and verification statement that could materially affect the validation and verification statement.
- j. Specific confidentiality requirements.
- k. Rules governing any reference to validation and verification, including the use of marks by the validation and verification body or its clients.

- I. Rules governing the responsibility for acceptance of inputs considered as part of validation and verification activities, e.g., conformity assessment results which are generated prior to the engagement or are provided by the client.

9. Process Requirements

9.1 Validation and verification process

DGC validation and verification activities shall follow the following process:

- a. Pre-engagement;
 - i. DGC shall require the client to submit at least the following information to carry out a pre-engagement review:
 - Client name and the proposed claim to be validated or verified
 - Locations where the client's activities are undertaken
 - The validation and verification program and associated specified requirements for the validation and verification
 - The objectives and scope of the validation and verification
 - Reports, data and any other relevant information
 - Where known at this stage and where applicable, the materiality and the level of assurance
 - Any other information as required by the validation and verification program.
 - ii. DGC shall conduct a pre-engagement review of the information received from the client to ensure that:
 - an applicable program exists or a program is to be established
 - the claim is understood (e.g., context, content and complexity)
 - the objectives and scope of the validation and verification have been agreed with the client
 - the specified requirements against which the claim will be validated/verified have been identified and are suitable.
 - where applicable, the materiality and level of assurance have been agreed
 - the process for validation and verification activities, such as evidence gathering activities and evaluation of gathered evidence can be achieved
 - the duration of validation and verification can be estimated
 - DGC has identified and has access to the resources and competences that are required to undertake the validation and verification
 - the time frame for the planned validation and verification can be proposed.
 - iii. Following the pre-engagement review of the submitted information by the client, DGC shall either accept or decline to perform validation and verification. Validation and verification requests shall be recorded for pre-engagement review.
- b. Engagement
 - i. DGC shall supply an agreement with each client for the provision of validation and verification activities in accordance with the relevant requirements of ISO/IEC 17029 and the requirements specified in the applicable validation and verification program:
 - for second- and third-party validation and verification activities, a legally enforceable agreement (e.g., a contract);
 - for first party validation / verification activities, an internal agreement such as service level agreement, internal contract, statement of work, or other enforceable internal agreement.
 - ii. The agreement between DGC and the client shall require that the client complies at least with the following:
 - validation or verification requirements

- making all necessary arrangements to conduct the validation or verification, including provisions for examining documentation and access to all relevant processes, areas, records, and personnel
 - where applicable, making provisions to accommodate observers;
 - complying with the rules of DGC for reference to validation and verification or use of marks.
 - iii. The agreement shall confirm that the client engages DGC to undertake validation or verification activities, including the specification of:
 - the items listed in 9.1 a) ii)
 - the specific requirements for the validation or verification activity, including any additional relevant requirements set by a program or standard.
 - iv. DGC shall take responsibility for any inputs that it accepts to take into account as part of its validation and verification activities, including those that have been generated by the client or other external parties.
- c. Planning
- i. DGC shall undertake the following planning activities taking into account the requirements specified in the applicable validation and verification program before undertaking the validation/verification activities:
 - assign competent resources to undertake the activities
 - determine the validation or verification activities based on the understanding of the claim
 - assess the risk of a material misstatement regarding the claim
 - confirm the timing and access arrangements with the client
 - determine evidence-gathering activities needed to complete the validation or verification in accordance with the specified requirements and consistent with the results of determining the validation or verification activities based on the understanding of the claim and assessment of the risk of a material misstatement regarding the claim.
 - prepare an evidence-gathering plan, taking into account confirmation of the timing and access arrangements with the client and any measures that the client has in place to control sources of potential errors, omissions and misrepresentations
 - prepare a validation or verification plan considering the evidence-gathering plan as an input. The validation or verification plan shall describe the activities and schedules, and shall include the following:
 - objectives and scope of validation or verification
 - identification of the validation or verification team members and their roles and responsibilities in the team (e.g. team leader, observer)
 - time frame and duration of validation or verification activities
 - specified requirements
 - ii. DGC shall inform the client of the names and roles of the team members with sufficient notice for any objection to the appointment of a team member to be made.
 - iii. DGC shall communicate to the client the validation or verification plan.
- d. Validation and verification execution
- i. DGC shall perform the validation and verification execution activities in accordance with a validation or verification plan.

- ii. The validation or verification plan shall be revised as necessary during the validation or verification execution activities. Any revisions to the validation or verification plan shall be internally documented, including the reasons, and communicated to the client.
 - iii. DGC shall undertake the following activities:
 - collection of sufficient objective evidence on original data and information, ensuring its traceability
 - through the data and information management process, any further analysis and calculation
 - identification of misstatements and consideration of their materiality
 - assessment of conformity with specified requirements, taking into account the validation and verification program.
 - iv. DGC shall prepare the following:
 - a conclusion on the outcome of the activities 9.1 d) iii)
 - a draft validation or verification statement
 - a report, if applicable. The report may be a separate document or can be included in a document containing the draft validation or verification statement.
- e. Review
 - i. DGC shall undertake review activities. The review shall be carried out by persons who have not been involved in the validation and verification execution. The review shall confirm:
 - that all validation or verification activities have been completed in accordance with the agreement and the program.
 - sufficiency and appropriateness of evidence to support the decision.
 - whether significant findings have been identified, resolved, and documented.
 - ii. The reviewer shall communicate with the validation or verification team when the need for clarification arises. The validation or verification team shall address concerns raised by the reviewer.
 - iii. The review shall have available all records of the validation or verification activities as specified in Section 9.1 i).
- f. Decision and issue of the validation / verification statement
 - i. Upon completion of the validation or verification review, DGC shall make the decision on whether to confirm the claim. The decision shall be made by persons who have not been involved in the validation or verification execution. Based on this decision, a validation or verification statement shall be issued or not according to the program requirements.
 - ii. When DGC is not issuing a validation or verification statement, DGC shall inform the client.
 - iii. When DGC issues a validation or verification statement, the statement shall:
 - state the client's name
 - identify whether it is a validation statement or a verification statement.
 - refer to the claim, including date or period which the claim covers
 - include the type of the validation or verification body in relation to the statement in question (i.e. first party, second party or third party)
 - include the name and address of DGC (if symbols, e.g. accreditation symbol, are included, they shall not be misleading or ambiguous)
 - describe the objectives and scope of the validation or verification
 - describe whether the data and information supporting the claim were hypothetical, projected and/or historical in nature
 - include a reference to the validation or verification program and associated specified requirements
 - include the decision made about the claim, including the fulfilment of any program related requirements (e.g. materiality or level of assurance)
 - indicate the date and the unique identification of the statement

- include any findings, that have not been addressed prior to the issue of the validation or verification statement, if required by the program.
- g. Facts discovered after the issue of the validation or verification statement
 - i. If new facts or information that could materially affect the validation or verification statement are discovered after the issue date, DGC shall:
 - communicate the matter as soon as practicable to the client, and, if required, the program owner
 - takes appropriate action, including the following:
 - discusses the matter with the client
 - considers if the validation or verification statement requires revision or withdrawal. If the validation or verification statement requires revision, DGC shall implement processes to issue a new statement, including specification of the reasons for the revision. Relevant steps of the validation or verification process may be repeated in the process to issue new statement. DGC shall communicate to other interested parties the fact that reliance of the original statement can now be compromised given the new facts or information.
- h. Handling of complaints and appeals
 - i. The following establishes the process for receiving, evaluating and making decisions on complaints and appeals. Any stakeholder may submit a complaint in writing to Digital Governance Council by emailing info@dgc-cgn.org. Complaints shall be handled giving respect to matters of confidentiality, conflict of interest and impartiality as specified in this Manual. Each complaint is assigned to the Digital Governance Council CEO. The CEO is responsible for gathering evidence, conducting a thorough review to substantiate claims and deciding on what actions are to be taken in response. The CEO may appoint a review panel, including relevant stakeholders, to evaluate findings and to ensure decisions are fair and transparent. Upon upholding a complaint or appeal, an action plan shall be developed by the DGC CEO, detailing responsibilities and timelines for implementation. Progress is monitored by the CEO and all actions and communications documented in accordance with this Manual. The DGC CEO shall ensure:
 - all necessary information is gathered to determine whether the complaint and appeal is substantiated.
 - Acknowledgement of receipt of the complaints and appeal and that the complainant and appellant are provided with the outcome and, if applicable, progress reports.
 - A description of the process for handling complaints and appeals to any interested party is made available
 - DGC is responsible for all decisions during the process for handling complaints and appeals.
 - DGC does not take any discriminatory actions as a result of investigation and decision on complaints and appeals.
 - The decision on the complaint or appeal be made by, or reviewed and approved by, the DGC Impartiality Committee, who is not involved in the decision which is the subject of the complaint or appeal in question.
- i. Records.
 - i. DGC shall maintain and manages records of validation and verification activities including:
 - information submitted during pre-engagement and scopes of validation and verification
 - justification for how validation and verification duration is determined

- any revisions to the validation and verification planning activities
 - demonstration that the validation and verification activities have been carried out in accordance with ISO 17029 requirements and the validation and verification program, including findings and information on material or non-material misstatements
 - evaluation, selection and monitoring of performance of bodies providing outsourced activities
 - evidence to support conclusions and the decisions
 - validation and verification statements
 - complaints and appeals, and any subsequent correction or corrective actions.
- ii. DGC shall ensure that all validation and verification records are maintained securely and confidentially, including during their transport, transmission, or transfer.
 - iii. DGC shall retain validation and verification records for in perpetuity.

10. Information Requirements

10.1 Publicly available information

DGC shall make publicly available:

- a. information about the validation and verification process
- b. commitment to impartiality
- c. list of validation and verification activities, including reference to applicable programs, such as services covered under a scope of accreditation
- d. complaints and appeals process

10.2 Other information to be available

DGC shall maintain and, upon request, provide clear, traceable, and accurate information about its activities and sectors in which it operates.

Unless otherwise specified in the validation or verification program, DGC shall provide, upon request, the status of a given validation and verification statement.

DGC shall provide information and update clients on the following:

- a. The applicable validation and verification programs and any changes
- b. The fees for the validation and verification activity
- c. DGC requirements for the client to:
 - i. comply with the validation and verification program
 - ii. make all necessary arrangements for the conduct of the validation and verification activities
 - iii. make provisions, where applicable, to accommodate the presence of observers (e.g., accreditation assessors or trainee validator/verifier)
- d. Its policy governing any statement that the client is authorized to use when making reference to its validation and verification statement in communication of any kind in line with the requirements in 10.3.

10.3 Reference to validation, verification and use of marks

DGC shall establish rules and procedure for governing any reference to validation and verification or use of its marks that it authorizes its clients to use. These rules shall ensure, among other things, traceability back to DGC and to the validation and verification statement issued. This reference or mark shall be used only in relation to the claim for which has been validated and verified and shall not mislead with regards to product certification.

10.4 Confidentiality

DGC shall be responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of validation and verification activities.

DGC shall inform the client, in advance, of the information it intends to place in the public domain. Except for information that the client makes publicly available, or when agreed between DGC and the client, all other information shall be considered proprietary information and regarded as confidential.

When DGC is required by law or authorized by contractual arrangements to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information released by DGC.

Information about the client obtained from sources other than the client (e.g., complainant, regulatory authority) shall be kept confidential between the client and DGC. DGC shall keep the provider (source) of this information confidential and shall not share it with the client, unless agreed by the source.

11. Management System Requirements

11.1 General

This Manual establishes and documents DGC's management system to support and consistently meet ISO/IEC 17029 requirements. Within this Manual, our policies and responsibilities are clearly articulated, outlining the roles and obligations of each stakeholder. It details the procedures for management review, internal audits (Section 11.3), corrective actions (Section 11.4), proactive management of risks and opportunities (Section 11.5), and documented information (Section 11.6). This Manual serves as a reference point for all personnel and shall be reviewed, at minimum, annually by the DGC CEO for improvement.

11.2 Management review

DGC CEO shall review the management system at least once in a year concurrent with the internal audit to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfilment of ISO/IEC 17029.

The inputs to management review shall be recorded and reviewed by the DGC CEO. Inputs shall include information related to the following:

- a. Changes in internal and external issues that are relevant to DGC
- b. Fulfilment of objectives
- c. Suitability of policies and procedures
- d. Status of actions from previous management reviews
- e. Outcome of recent internal audits
- f. Corrective actions
- g. Assessments by external bodies
- h. Changes in the volume and type of the work or in the range of validation / verification body's activities
- i. Client and personnel feedback
- j. Complaints and appeals
- k. Effectiveness of any implemented improvements
- l. Adequacy of resources
- m. Results of risk analysis
- n. Other relevant factors, such as monitoring activities and training.

The DGC CEO shall record the outputs from the management review, including all decisions and actions related to the following:

- a. The effectiveness of the management system and its processes
- b. Improvement of DGC activities related to the fulfilment of ISO/IEC 17029 requirements
- c. Provision of required resources

- d. Any need for change.

11.3 Internal audits

DGC shall conduct internal audits at least once per year to provide information on whether the management system:

- a. conforms to DGC requirements for its management system, including the validation and verification activities; as well as the requirements of ISO/IEC 17029
- b. is effectively implemented and maintained.

The following establishes the audit program designed to ensure the organization's compliance with ISO/IEC 17029 requirements and internal directives, while also evaluating operational efficiency and identifying areas for improvement. Conducted annually by the Digital Governance Standards Institute, the DGSi Executive Director shall employ the following methods to thoroughly assess all requirements specified in this Manual and to complete their audit over the period of one fiscal quarter:

- a. Document reviews: Examination of policies, procedures, and records.
- b. Interviews: Discussion with key personnel to understand processes and identify potential issues.
- c. Sampling: Selection of a representative sample of validation and verification activities for detailed examination.
- d. Observation: Direct observation of operations to assess conformity with requirements specified in this Manual.

The DGSi Executive Director shall report findings and the results of the audits to the DGC CEO and other relevant personnel with consideration to the importance of activities, changes affecting the organization, and results of previous audits to ensure its effectiveness in driving compliance and continuous improvement.

The DGC CEO shall initiate implementation of appropriate correction and corrective actions immediately following the receipt of report findings and results of the audits

The DGC CEO shall retain records as evidence of the implementation of the audit program and the audit results.

DGC's audit program by design ensures the internal auditor does not audit their own work.

11.4 Corrective action

The following establishes the process for identification and management of nonconformities in DGC validation and verification activities.

A nonconformity may be identified during any stage of validation and verification process by personnel and shall be brought to the attention of the DGC CEO. The DGC CEO shall determine the cause of the nonconformity using root cause analysis techniques and initiate prompt corrective actions outlining specific steps and assigning responsibilities to ensure timely resolution. Corrective actions shall be taken appropriate to the impact of the problems encountered. The DGC CEO shall monitor progress closely to evaluate the need for any additional actions to ensure that the nonconformity does not recur and to record the results of actions taken. Post-implementation and during the next internal audit, the DGC CEO shall review the effectiveness of corrective actions.

11.5 Actions to address risks and opportunities

The DGC CEO shall consider the risks and opportunities associated with the validation and verification activities on an annual basis as part of the Management review (Section 11.3), in order to:

- a. give assurance that the management system achieves its intended results
- b. enhance opportunities to achieve the program and objectives of DGC
- c. prevent, or reduce, undesired impacts and potential failures in DGC activities

- d. achieve improvement

The DGC CEO shall plan:

- a. actions to address these risks and opportunities
- b. how to integrate and implement these actions into its management system
- c. how to evaluate the effectiveness of these actions

Actions taken by the DGC CEO to address risks and opportunities shall remain proportional to the potential impact on the validation and verification statement.

11.6 Documented information

DGC shall control documented information required by its management system as specifying in this Manual to ensure that documented information is:

- a. available and suitable for use, where and when it is needed, and
- b. adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

The control of documented information shall be overseen by the DGC CEO for continuing suitability, adequacy and effectiveness and reviewed on an annual basis as part of the Management review (Section 11.2).

All documented information of DGC validation and verification activities shall be kept in electronic format, stored in the corporate cloud, and restricted to safeguard confidentiality.

Document authors serve as the primary controllers for documents they author and shall be responsible for the creation, review, update, version control, distribution and use of the documented information.

The DGC CEO shall authorize and provision personnel access to documented information in accordance with this Manual. The DGC CEO shall ensure the preservation of documents, including legibility and that documented information retained as evidence of conformity is protected from unintended alterations, through secure storage systems and regular backups.

All documented information of DGC validation and verification activities shall be kept in electronic format, stored in the corporate cloud, and are restricted to safeguard confidentiality. If required, documented information shall be made available to the accreditation body or their representative for evaluation for an agreed period as a part of contract or agreement.

All employees shall sign a confidentiality agreement with DGC for not disclosing any validation and verification activity matters to unauthorized persons.

All documented information received by external origin for the planning and operation of the management system shall be identified and shared with the DGC CEO and controlled.