

Required Documentation for ISO 37301:2021

NOTE *The requirements for documented information in italics (in the table below) relate to those that are stipulated in the ISO Annex SL Harmonised Structure (HS) [previously the High Level Structure (HLS)] core text. These requirements are therefore present, in similar forms, in all ISO management system standards based upon the HLS.*

Clause	Title	(Shall) Requirement	Notes
4.3	<i>Determining the scope of the compliance management system</i>	<i>The scope shall be available as documented information.</i>	<i>Periodically (typically annually) reviewed statement of the scope of the management system.</i> <i>This can be on the same document as the policy.</i>
4.5	Compliance obligations	The organization shall maintain documented information of its compliance obligations.	Refer to the following. https://www.parola.co.uk/MS/Cross_Reference_of_ISO_37301_Compliance_Obligations_and_Evaluation.pdf
4.6	Compliance risk assessment	The organization shall retain documented information on the compliance risk assessment and on the actions to address its compliance risks.	
5.2	<i>Compliance policy</i>	<i>The compliance policy shall: – be available as documented information.</i>	<i>Periodically (typically annually) reviewed statement of the policy of the management system.</i>
6.2	<i>Compliance objectives and planning to achieve them</i>	<i>The compliance objectives shall (g) be available as documented information.</i>	<i>Periodically reviewed statement of the objectives of the management system and records of their attainment.</i> <i>The statement of the objectives can be on the same document as the policy.</i>
7.2	Competence		<i>Training needs analysis, Records of training delivered/received Tests of effectiveness of training. See 7.2.3 below.</i>
7.2.1	General	<i>Appropriate documented information shall be available as evidence of competence</i>	
7.2.3	Training	Training records shall be retained as documented information.	See 7.2.1 above.
7.4	Communication	The organization shall: – retain documented information as evidence of its communication, as appropriate.	
8.1	<i>Operational planning and control</i>	<i>Documented information shall be available to the extent necessary to have confidence that the processes have been carried out as planned.</i>	

Clause	Title	(Shall) Requirement	Notes
8.4	Investigation process	The organization shall retain documented information on the investigation.	
9	<i>Performance evaluation</i>		<i>Monitoring, and appropriate metrics to evaluate the operation of processes of the Compliance management system and attainment of (policy) objectives. See 9.1.5 below.</i>
9.1	<i>Monitoring, measurement, analysis and evaluation</i>		<i>Refer to the following.</i> https://www.parola.co.uk/MS/Cross_Reference_of_ISO_37301_Compliance_Obligations_and_Evaluati on.pdf
9.1.1	<i>General</i>	<i>Documented information shall be available as evidence of the results.</i>	
9.1.2	Sources of feedback on compliance performance		Clauses 9.1.2, 9.1.3 and 9.1.4 stipulate requirements that clearly require documentation but the three clauses do not explicitly require documentation.
9.1.3	Development of indicators		
9.1.4	Compliance reporting		
9.1.5	Record keeping	Accurate up-to-date records of the organization's compliance activities shall be retained to assist in the monitoring and review process and demonstrate conformity with the compliance management system.	Clause 9.1.5 consists of the one sentence to the left and by inference requires appropriate records to be maintained pertaining to Clauses 9.1.2, 9.1.3 and 9.1.4. See 9.1.1. above.
9.2.2	<i>Internal audit programme</i>	<i>Documented information shall be available as evidence of the implementation of the audit programme(s) and the audit results.</i>	<i>Records of internal audits, including any nonconformities, potential nonconformities, opportunities for improvement etcetera and consequential actions (see 10.2 below.)</i>
9.3.3	<i>Management review results</i>	<i>Documented information shall be available as evidence of the results of management reviews.</i>	<i>Typically minutes of meetings, but management review could consist of other mechanisms, in addition to, or even instead of, meetings.</i>
10.2	<i>Nonconformity and corrective action</i>	<i>Documented information shall be available as evidence of:</i> <i>– the nature of the nonconformities or noncompliances, or both, and any subsequent actions taken;</i> <i>– the results of any corrective action.</i>	<i>Records of nonconformities and consequential corrective actions, both arising from audits (see 9.2.2 above) and unrelated to audits.</i>