General Accreditation Criteria

ISO/IEC 17020 Standard Application Document

Issued: May 2021

Effective: June 2021

Table of Contents

Purpose

This document provides interpretative criteria and recommendations for the application of ISO/IEC 17020 covering all types of inspection activities for both applicant and accredited facilities.

Facilities must comply with all documents in the *NATA Accreditation Criteria* (NAC) package for inspection (refer to *NATA Procedures for Accreditation)*.

The clause numbers in this document follow those of ISO/IEC 17020, however, as not all clauses require interpretation the numbering may not be consecutive.

As a signatory to the International Laboratory Accreditation Cooperation (ILAC), Mutual Recognition Arrangement (MRA), NATA is required to adopt ILAC Policy documents. Accordingly, inspection bodies seeking accreditation with NATA must comply with ILAC P15: *Application of ISO/IEC 17020:2012 for the Accreditation of Inspection Bodies.* A copy of this policy can be obtained from the ILAC website (https://ilac.org/publications-and-resources/ilac-policy-series/) and forms part of the NAC.

4 General Requirements

4.1 Impartiality and independence

4.1.1 The requirements relating to impartiality are also applicable to subcontractors (see clause 6.1.12).

4.1.6 Assignment of independence Type, as per Annex A of ISO/IEC 17020, will be confirmed during the assessment process.

The assigned independence Type can be amended at anytime if the inspection body's independence arrangements change, provided the inspection body formally notifies NATA and can demonstrate that it meets the criteria of the different inspection body Type.

5 Structural Requirements

5.1 Administrative requirements

5.1.1 Where the inspection body is part of a larger legal entity, the structure of the entire legal entity may be subject to assessment to determine the relationships and any effect on independence or impartiality.

5.1.3 Facility documentation must include or reference the scope of accreditation and the policy on the use of the NATA endorsement.

6 Resource requirements

6.1 Personnel

6.1.1 The competence of inspectors is understood to encompass both theoretical knowledge and practical ability. Depending on the industry, competence may require familiarity with relevant regulations, standards, codes, materials, products, technologies, processes and practices.

The competence requirements also apply to external personnel (e.g. subcontracted staff) who may influence the inspection activities performed.

Where there is a regulatory framework, a Deed of Agreement, Memorandum of Understanding or other binding agreement with a third party, NATA will formally acknowledge individuals in the report on assessment who have been nominated and authorised by the inspection body to release results.

6.1.4 The duties, responsibilities and authorities for each position (which could have an effect on the management, performance, recording or reporting of inspections), may be documented in job descriptions or other documentation.

6.1.9 The frequency of observing each inspector on-site must be at least once during the accreditation cycle (i.e. every three years).

6.2 Facilities and equipment

6.2.7 Refer to NATA's *General Accreditation Criteria: Metrological traceability policy.*

In-house calibration

A facility performing its own calibrations will also be subject to technical assessment of these calibrations against ISO/IEC 17025. The assessment team will determine if the in-house calibrations are fit for the purpose for which they are being used and that a reasonable estimate of the associated measurement uncertainty has been made. Fees will be charged where significant additional assessment effort is required (i.e. time or additional assessors). Specialist calibration assessors may be used when either the calibration is outside the area of expertise of the technical assessor(s) who would normally conduct the assessment, or if a non-standardised calibration method is adopted, or if it would be more time or cost effective.

A facility performing its own calibrations may also be subject to proficiency testing or measurement audits where non-standard calibration methods are used.

For addition information, refer to NATA's *General Accreditation Criteria: Equipment assurance, in-house calibration and equipment verification*.

6.2.8 Refer to NATA's *General Accreditation Criteria: Metrological traceability policy.*

6.2.9 Guidance on the frequency of in-service checks on common equipment is provided in NATA's *General Accreditation Guidance: General equipment table*.

6.2.10 Refer to NATA's *General Accreditation Criteria: Metrological traceability policy.*

6.2.13 Procedures for protecting the integrity and security of data held electronically should include, but not be limited to, effective backup practices, virus protection and password protection. This includes information issued electronically (reports, etc) as well as records held by the inspection body.

6.3 Subcontracting

6.3.4 A competent external provider is for example, but not limited to, an accredited NATA facility or a facility accredited by a signatory to a Mutual Recognition Arrangement.

The accreditation status of external providers should be regularly reviewed to ensure currency.

Note: Information on accreditation status and scope of accreditation may be found at NATA's website or by contacting one of NATA's offices.

7 Process Requirements

7.1 Inspection methods and procedures

7.1.1 Where standard methods are used, the current version must be adopted. In such cases, the date of publication is not included in the scope of accreditation.

Where a superseded or withdrawn version of a standard method is used due to regulatory or scheme requirements, the year of issue will be included in the scope of accreditation.

Inspection bodies accredited to standard methods must maintain records of all interpretive decisions which they may make as a response to ambiguities in the methods or specifications contained in standards.

Proficiency testing

ILAC P9: *Policy for Participation in Proficiency Testing Activities* notes that proficiency testing (PT) may be used in some types of inspection where available and justified by the inclusion of testing activities that directly affect and determine the inspection result, or when required by law or by regulators. It is, however, recognised that proficiency testing is not a usual and expected element in the accreditation of most types of inspections.

Where proficiency testing is available and relevant for the testing activities that affect and/or determine inspection results and as detailed in NATA's *General Accreditation Criteria: Proficiency testing policy*, participation in PT must be at least once every two years.

Note: Measurement audits are considered a form of PT activity.

Where formal PT programs are not available for any activities or do not provide sufficient coverage, inspection bodies must investigate other means of assuring the quality and performance of testing activities.

7.1.2 Inspection bodies may perform sampling activities as part of their services, either as a standalone activity or as part of a wider inspection activity.

Where relevant, the procedures covering sampling require the development of job-specific sampling plans.

While it is the practice in some industries to base an evaluation upon limited sample sizes, inspection bodies should refer to appropriate standards where these exist and are reminded of the risks associated with extending results from a sample to a wider population of items. Where assumptions of homogeneity have been made, these must be brought to the attention of the customer.

7.1.3 Non-standard methods and procedures which may be used must be appropriately validated to ensure they satisfy the intended purpose of the inspection activity.

7.1.4 Where acceptance/rejection criteria are nominated in contracts or specification documents, the criteria must be included, as appropriate, in the worksheets and/or checklists used by the inspection body.

7.1.7 Where manipulation of electronic records occurs to enhance inspection practices or reporting, a record of the original data must be retained. Further, a record of the process(es) used for the enhancement of the original data must be kept. The record must allow another individual to be able to validate the enhancement process(es) applied to the original data.

7.3   Inspection records

7.3.1 Records include, but are not limited to the following:

- customer requests for inspection services;

- work instructions (with all verbal instructions from the customer included);

- location, date and time of the inspection activity;

- all original observations (including photographs), notes and calculations made during an inspection;

- the identity of the staff undertaking part(s) or the whole of the inspection;

  Note: It is recognised that a number of staff may be involved in activities. It is the inspection body's responsibility to identify the critical steps(s) and that the identities of the staff concerned are recorded.

- computer data files and/or software programs;

- results of sampling, testing and/or measurements, including copies of reports on sub-contracted work, which form part of the inspection process;

- records relating to equipment which have a significant influence on the result of the inspection activity;

- the inspection report;

- records of all discussions with customers during or after the inspection relevant to the preparation of the inspection report.

As far as practicable, all records must be indelible / permanent and data or observations recorded in such a manner that prevents amendment or loss of the original. Where corrections are necessary, the date this occurs and the responsible person must be traceable and the original data must not be lost.

7.4   Inspection reports and inspection certificates

7.4.1 For use of the NATA endorsement refer to the *General Accreditation Criteria: Use of the NATA emblem, NATA endorsement and references to accreditation.*

All inspection results must be authorised prior to the report or certificate being released.

Reports may be electronically issued (including from a site other than the accredited facility) provided that the reports have been appropriately authorised for release.

The inspection body must be able to demonstrate appropriate controls over the electronic generation, access, storage and back-up of results and reports and

program controls such as password protection. If the report is to be accessed from a web site by the customer there must be appropriate controls in place to ensure the report can only be accessed and downloaded in a protected format.

Any information normally included in a hardcopy report must be included on the electronically transmitted version and appear in any hardcopy printed by the recipient. Flexible pagination to accommodate formatting changes when printed by the recipient may also be required.

It must be ensured that any handwritten comments included on issued reports are also included in the copy of the reports retained by the facility.

7.4.2 Reporting professional judgement, including inspector's notes and calculations based upon published formulae applied in reporting the current status of an inspected item, is considered normal inspection reporting practice.

Regulatory authorities or customers may place additional requirements on the reporting of inspection results. Where a customer form is used for reporting, the inspection body issuing the completed form (report) must be clearly identified. Where such a form does not require the information covered by clause 7.4.2, the inspection body must retain appropriate records to provide that information if requested. A record to the effect that the customer specified the use of its form must be retained.

Progress reports issued over an extended period in relation to fabrication, installation, commissioning and/or any other time-dependant inspection activity, must each comply with the reporting requirements.

7.4.5 A procedure must be available covering the withdrawal and re-issue of inspection reports.

8   Management system requirements

8.1   Options

8.1.1   General

Unless otherwise prescribed by legislation or contractual obligation, retention times for records shall not be less than 4 years or, in the case of equipment records, the maximum recalibration interval of equipment (whichever is the longer period).

The internal audit schedule must cover all the requirements of ISO/IEC 17020 ideally within a twelve-month period.

The effectiveness of the management system shall be reviewed by management at least once per year. It is recognised that inspection bodies have different organisational structures. Accordingly, various items covered by management review may be considered at different times and at different organisational meetings.

8.1.3   Option B

Certified ISO 9001 management system

A facility seeking accreditation to ISO/IEC 17020 may exercise Option B (i.e. establish an ISO 9001 management system). In such a case, the system may not be assessed in full by NATA subject to:

- the management system being certified by a certification body accredited by JAS-ANZ, or by another signatory to the International Accreditation Forum (IAF) Multilateral Recognition Agreement (MLA). The certification body must be accredited to certify management system schemes to ISO 9001. NATA may request the facility to provide evidence of the certification body's scope of accreditation; and

- copies of the most recent certification audit reports being made available to NATA for review, including confirmation from the certification body of the close out of any non-conformities raised; and

- the management system allows the fulfillment of the requirements of clauses 4 to 7 of ISO/IEC 17020 for the activities covered by the facility's NATA scope of accreditation.

The required extent of assessment will depend on the evidence provided.

Where nonconformities are identified, these will be reported against clause 8.1.3.

The facility shall notify NATA within 14 days when a change occurs in its ISO 9001 certification status.

Non-certified ISO 9001 management system

NATA will assess the management system in full against the requirements of Option A when the facility has adopted an ISO 9001 system which has not be independently certified by a certification body recognised under the IAF MLA.

Annex A
Independence requirements for inspection bodies

Requirements for inspection bodies (Type A)

An inspection body may have links to other legal entities, for example, common owners and common owners' appointees on boards or equivalent. These are only considered acceptable if such persons do not have the possibility to influence the outcome of the inspection body's services.

There exists a possibility to affect the outcome of an inspection activity if a person has the ability to, for example:

- influence the selection of inspectors for specific assignments or customers; or
- influence decisions on conformity in specific inspection assignments; or
- influence remuneration for individual inspectors; or
- influence remuneration for specific assignments or customers; or
- initiate the use of alternative work practices for specific assignments.

Requirements for inspection bodies (Type B)

A Type B inspection body may form part of a user organisation or a supplier organisation.

Requirements for inspection bodies (Type C)

'Explicitly' is understood to mean 'clearly'. Often Australian regulations do not identify independence requirements for inspection activities. In situations where the same person may inspect and be asked to put right, make safe or oversee the rectification of any deficiencies that are identified, the client should be advised of and accept the proposed arrangements. The safeguards the inspection body should consider to protect against possible future claims of bias or over-servicing could include photographic records, client acceptance of findings, retention of replaced items etc.

References

This section lists publications referenced in this document. The year of publication is not included as it is expected that only current versions of the references shall be used.

Standards

ISO 9001   *Quality management systems - Requirements*

ISO/IEC 17020   *Conformity assessment – Requirements for the operation of various types of bodies performing inspection*

ILAC Documents

ILAC P15   *Application of ISO/IEC 17020:2012 for the Accreditation of Inspection Bodies*

NATA Documents

NATA Rules

General Accreditation Criteria   *Metrological traceability policy*

General Accreditation Criteria   *Equipment assurance, in-house calibration and equipment verification*

General Accreditation Criteria   *Use of the NATA emblem, NATA endorsement and references to accreditation*

General Accreditation Criteria   *Proficiency testing policy*

General Accreditation Guidance   *General equipment table*

Amendment table

The table below provides a summary of changes made to the document with this issue.

Section or clause	Amendment
Whole document	This document has been editorially revised with previous prescriptive criteria having been removed. The ILAC P15 criteria previously included have also been removed. The main reason for this is that P15 needs to be read in its entirety and not just the extracts which were included in the previous issue of the Standard Application Document. Inspection bodies must obtain a copy of ILAC P15 as described on page 4 of this Standard Application Document.
5.1.3	As per all other NATA accreditation programs, a criteria has been added that documentation must be available that includes or references the inspection body's scope of accreditation and the policy on the use of the NATA endorsement.
6.1.1	As per all other NATA accreditation programs, a criteria has been added that where a formal agreement exists, staff who are authorised to release results, will be listed in the report on assessment.
6.2.13	Relevance to information issued electronically made explicit.
6.2.7	NATA's processes for assessing in-house calibrations have been added.
6.3.4	Guidance provided about competent subcontractors.
7.1.1	Clarification provided regarding use of standard methods and how these are defined in the scope of accreditation. Proficiency Testing criteria as applicable to inspection, and as required by ILAC, have been added.
7.3.1	Note added.