**DP SM 4.6-03-2021**

**(ILAC-P15:05/2020, IDT)**

**Application of GOST ISO/IEC 17020:2013 for accreditation of inspection bodies**

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**1 APPLICATION AREA**

**1.1**  This documented procedure (hereinafter referred to as the procedure) is a document of the management system of the Republican Unitary Enterprise "Belarusian State Accreditation Center" (hereinafter referred to as BSCA), developed in development of section 4.6 of the RK CM
taking into account the requirements of the document ILAC P15, clause 4.6 of GOST ISO/IEC 17011 and establishes provisions for the implementation of GOST ISO/IEC 17020.

**1.2** The requirements of this procedure are mandatory for BSCA personnel, applicants for accreditation and accredited entities.

**2 REFERENCES**

In this procedure, reference is made to the following documents:

[Law of the Republic of Belarus dated 24.10.2016 No. 437-З "](file:///C%3A%5CUsers%5Cmorozova%5CAppData%5CRoaming%5CMicrosoft%5CWord%5C%D0%97%D0%B0%D0%BA%D0%BE%D0%BD%20%D0%BE%D0%B1%20%D0%BE%D1%86%D0%B5%D0%BD%D0%BA%D0%B5%20%D1%81%D0%BE%D0%BE%D1%82%D0%B2%D0%B5%D1%82%D1%81%D1%82%D0%B2%D0%B8%D1%8F.docx)On Conformity Assessment of Technical Requirements and Accreditation of Conformity Assessment Bodies" (hereinafter referred to as the Law No. 437-З);

Resolution of the State Committee for Standardization of the Republic of Belarus of May 31, 2011 No. 27 "On Approval of Accreditation Rules" (hereinafter referred to as the Accreditation Rules);

STB ISO 9001 (IDT) Quality Management Systems. Requirements;

GOST ISO/IEC 17011 (ISO/IEC 17011, IDT) Conformity assessment. Requirements for accreditation bodies accrediting conformity assessment bodies;

GOST ISO/IEC 17000 (ISO/IEC 17000, IDT) Conformity assessment. Vocabulary and general principles;

GOST ISO/IEC 17007 (ISO/IEC 17007, IDT) Conformity assessment. Guidelines for the development of regulatory documents intended for use in conformity assessment;

GOST ISO/IEC 17020 (ISO/IEC 17020, IDT) Conformity assessment. Requirements for the work of different types of inspection bodies;

ILAC G27:07 Guidelines for measurements performed during the inspection process;

ILAC P8:03 ILAC Mutual Recognition Agreement (Agreement): Additional Requirements for the Use of Accreditation Marks and References to Accreditation Status by Accredited Conformity Assessment Bodies;

ILAC P10:07 ILAC Policy on Metrological Traceability of Measurement Results;

ILAC P15:07 Application of ISO/IEC 17020:2012 for accreditation of inspection bodies;

Quality Manual of the State Enterprise "BSCA".

*Note - Current versions of reference documents should be used when using this procedure. If the reference documents are replaced (modified), then the replaced (modified) documents should be used in this procedure. If reference documents are deleted without replacement, the provisions of the procedure in which references are made to them shall apply to the extent that those references are not affected.*

**3 TERMS AND DEFINITIONS**

In this procedure, terms are used in accordance with GOST ISO/IEC 17000 and GOST ISO/IEC 17020, as well as the following terms and definitions:

**3.1 installation:** A set of components combined to achieve a single goal that cannot be achieved when these components are used separately.

**4 NOTATIONS AND ABBREVIATIONS**

The following symbols and abbreviations are used in this procedure**:**

|  |  |
| --- | --- |
| BSCA, Accreditation Body | - Republican Unitary Enterprise "Belarusian State Accreditation Center"; |
| RK  | – Quality Manual; |
| MS | – Management system; |
| IAF MLA | – IAF Multilateral Recognition Arrangement; |
| ILAC | – International Laboratory Accreditation Cooperation; |
| IDT | – Designation of identical degree of compliance with the international standard (identity in technical content and structure). |

**5 GENERAL PROVISIONS**

**5.1** This document contains information on the application of GOST ISO/IEC 17020 in the accreditation of inspection bodies. The document is intended for use by accreditation bodies that evaluate inspection bodies for the purpose of accreditation, as well as for use by inspection bodies focused on carrying out their activities in accordance with accreditation requirements.

**5.2**  For ease of search, each comment is indicated by the corresponding paragraph of the GOST ISO/IEC 17020 standard with the addition of a letter designation, for example, comment 4.1.4 k1 will be the first in relation to paragraph 4.1.4 of GOST ISO/IEC 17020.

**5.3** The term "should" is used in this procedure to refer to those provisions that reflect the requirements of GOST ISO/IEC 17020, or, in some cases, the requirements for the activities of the accreditation body set out in GOST ISO/IEC 17011, and which are mandatory.

The term "should" is used in this policy to refer to those provisions that, while not mandatory, are recognized by ILAC as a means of complying with the requirements.

The term "may" is used to indicate what is permitted.

The term "be able" is used to indicate a capability or ability.

**5.4** Individual inspection schemes may establish additional accreditation requirements. It is not the purpose of this document to define what these requirements might be or how to implement them.

**5.5** This version of the document provides guidance on advanced technologies that are not addressed in ISO/IEC 17020:2012 and takes into account that inspection activities may be part of a larger process involving testing and certification.

**6 GENERAL REQUIREMENTS**

**6.1 Impartiality and independence**

**6.1.1** GOST ISO/IEC 17020 attaches paramount importance to the prevention of undue influence of inspection activities. Paragraph 4.1.2 requires that commercial, financial and other pressures do not call into question impartiality. The standard recognizes that staff and organizational relationships (4.1.3) have the potential to call into question impartiality and controls may be required to maintain impartiality (4.1.4). Finally, Independence is considered and the organs are classified according to the requirements of types A, B and C to signal the nature of the relationship between the inspection body and the facilities being inspected. Annex 2 contains additional recommendations.

**6.1.2** (4.1.3 k1) "On an ongoing basis" means that the inspection body identifies a risk whenever occurring that may affect the impartiality of the inspection body.

**6.1.3 (4.1.3 k2) The inspection body should describe any of its relationships or those of its personnel which may affect their impartiality to any extent, using organizational charts or other means.**

**6.1.4 (4.1.3 k3) Annex 1 provides an example of a possible format for an impartiality risk analysis.**

**6.1.5** (4.1.4 k1) Threats and incentives directed at inspectors or other personnel of inspection bodies may pose a serious risk to impartiality. Threats and incentives may come from the inspection body itself or from outside and may occur at any time. The inspection body shall record the perceived and apparent risks to the impartiality of the inspections. All personnel working on behalf of the inspection body Must be aware of the responsibility for impartial actions, be appropriately involved in the impartiality of the inspection body and have appropriate access to provide notes when questions arise. The inspection body's analysis of impartiality risks should include details of the inspection body's actions in the event that such risks arise.

**6.1.6 (4.1.5 k1) The inspection body should develop documents to demonstrate impartiality in the conduct of inspection activities, in the management of conflicts of interest and in ensuring the objectivity of inspection activities. The actions of top management should not contradict these documents.**

**6.1.7** (4.1.5 k2) The only way for senior management to demonstrate the implementation of impartiality is to make relevant documents and policies publicly available.

**6.1.8 (4.1.6** k1) An inspection body may have different types of independence (type A, B or C) for different inspection activities included in the scope of accreditation. However, an inspection body may not offer different types of independence for the same inspection activity.

 6.1.9 (4.1.6 k2) Compliance with Type A Independence Requirements A.1b and A.1.c is binary (yes or no), i.e., partial compliance with Type A independence requirements is not possible. It also means that the risk analysis that results from controls to minimize the risks of impartiality in a situation where these Type A requirements are not met. Therefore, it is only possible to eliminate the situation, which does not meet the requirements of Type A.

**6.2 Administrative requirements**

**6.2.1** (5.1.3 k1) The inspection body should describe its activities by defining the general scope and scope of the inspection (e.g. categories/subcategories of products, processes, services or installations) as well as the level of inspection (see note to paragraph 1 of the standard) and, where applicable, specify the rules, standards or specifications containing the requirements under which the inspection will be carried out. ILAC G28 provides recommendations on the formation of accreditation areas for inspection bodies.

**6.2.2** (5.1.4 k1) The level of provisions should be compared with the level and nature of the obligations that may arise as a result of the activities of the inspection body.

**6.2.3** (5.1.4 k2) The assessment of "adequacy" may be based on evidence of agreement between the parties to the contract and consideration of any relevant legal requirements or established rules. The inspection body should be able to demonstrate what factors have been taken into account in determining what constitutes "sufficient financial resources". The accreditation body should not approve the financial resources belonging to the inspection body.

**6.3 Organization and management**

**6.3.1** (5.2.2 k1) The size, structure, composition and management of the inspection body as a whole should ensure the competent performance of activities within the scope of accreditation of the inspection body.

**6.3.2** (5.2.2 k2) "To ensure the performance of the functions of the inspection body" means that the inspection body shall take measures to maintain an adequate level of awareness of the current technical scheme and/or legislative developments in its field of activity.

**6.3.3** (5.2.2 k3) The inspection body should maintain the qualifications and competence to carry out inspections at long intervals (usually at intervals of more than one year). An inspection body may demonstrate qualification and competence for an infrequently conducted inspection by means of "mock inspections" and/or through the inspection of similar goods.

**6.3.4** (5.2.3 k1) The inspection body should keep up to date the organizational chart or documents clearly defining the functions and responsibilities of the personnel of the inspection body. The position of the technical manager(s) and management members referred to in paragraph 8.2.3 shall be clearly indicated in the chart or documents.

**6.3.5** (5.2.4 k1) It may be necessary to provide information on personnel carrying out activities, both to the inspection body and to other offices and departments, in order to take into account their participation and the influence they may have on inspection activities.

**6.3.6** (5.2.5 k1) In order for a specialist to be "at the disposal" of the inspection body, he or she must be employed either as a staff member or under a contract.

**6.3.7** (5.2.5 k2) In order to ensure compliance with the requirements of GOST ISO/IEC 17020 during the inspection, the technical manager(s) and deputy(s) should have the technical competence to understand all relevant technical decisions related to the inspection.

**6.3.8** (5.2.6 k1) In an organization where the absence of a key person results in disruption, the requirement to appoint substitutes does not apply.

**6.3.9** (5.2.7 k1) The categories of personnel involved in inspection activities include inspectors and other professionals who may influence the management, conduct of the inspection, and the compilation of inspection records or reports.

**6.3.10** (5.2.7 k2) Job descriptions or other documentation should detail the duties, responsibilities and powers for each category referred to in 5.2.7 k1.

**7 RESOURCE REQUIREMENTS**

**7.1 Personnel**

 7.1.1 (6.1.1 k1) Where appropriate, the inspection body shall establish and document the competence requirements for each inspection activity as described in 5.1.3 k1. Some aspects of the competency requirements may already be defined by regulators, scheme owners or customers. In this case, the inspection body should include/refer to these requirements in its definitions of general competence. The inspection body is responsible for correctness of competence definitions and their compliance with the requirements of GOST ISO/IEC 17020.

**7.1.2** (6.1.1 k2) For "personnel involved in the inspection", see 5.2.7 k1.

**7.1.3** (6.1.1 k3) The requirements for competence should include knowledge of the management system of the inspection body and the ability to implement administrative as well as technical procedures applicable in the course of the activities carried out.

**7.1.4 (**6.1.1 k4) In establishing the requirements for competence, consideration should be given to the professional judgment used for the purpose of determining conformity.

**7.1.5 (**6.1.2 k1) All the requirements of GOST ISO/IEC 17020 apply equally to full-time employees and contract employees.

**7.1.6 (6.1.5** k1) In accordance with the procedure formally authorizing inspectors, the documents should include relevant information, such as the inspection activity authorized, the commencement of the permit, the identity of the person establishing the authorization and, where appropriate, the date of expiry of the permit.

**7.1.7 (6.1.6** k1) The "working period under the supervision of experienced inspectors" referred to in paragraph (b) should include participation in inspections at the sites where these inspections are carried out.

**7.1.8 (6.1.7 k1) The need for training of employees should be examined regularly. The frequency of training should be established in order to meet the requirements of paragraph 6.1.6c. The results of the training analysis, such as the need for further training or lack thereof, should be documented.**

**7.1.9 (**6.1.8 k1) The main purpose of monitoring is to provide the inspection body with a tool to ensure the stability and reliability of the inspection results, including professional judgement on the general criteria. Monitoring may identify the need for individual training or an analysis of the inspection body's management system.

**7.1.10 (**6.1.8 k2) For "other personnel involved in the inspection", see 5.2.7 k1.

**7.1.11 (**6.1.9 k1) Evidence of the competent work of the inspector shall be considered sufficient if it is supported by the following information:

- satisfactory exam results;

- a positive result of monitoring (see note to clause 6.1.8), a positive result of individual assessments in order to confirm the result of the inspection (allowed and considered appropriate during the inspection of construction documentation);

- Positive results of activities carried out under the supervision of experienced inspectors;

- absence of substantiated complaints or appeals;

- A satisfactory result of the supervision by the competent authority, e.g. a personnel certification body.

**7.1.12 (**6.1.9 k2) An effective on-site monitoring programme for inspectors can meet the requirements of paragraphs 5.2.2 and 6.1.3. The programme should be designed taking into account:

- risks and complexity of the inspection;

- results of previous monitoring;

- Technical, procedural or legislative changes in relation to inspection.

The frequency of on-site observations depends on the questions listed above, but should be carried out at least once during the entire accreditation cycle (see application note 6.1.9 k1). In the event that the degree of risk or complexity, as well as the results of previous observations, require otherwise, or, if there are technical, procedural or legislative changes, it is necessary to increase the number of observations. Depending on the scope, type and scope of the inspection provided for by the inspector's authorization, it is permissible to carry out more than one observation of the inspector's activities, which will allow for a greater coverage of the entire scope of his competence. In addition, the need for more frequent on-site observations may arise in the absence of evidence to support the satisfactory performance of the inspector.

**7.1.13 (**6.1.9 k3) This requirement applies even if the inspection body has only one technically competent person.

**7.1.14 (**6.1.10 k1) The record of the permit shall contain the basis for the authorization (e.g. on-site observation of the inspection).

**7.1.15 (**6.1.12 k1) Policies and procedures should assist the personnel of the inspection body in identifying and addressing issues relating to commercial, financial and other risks or benefits that may affect their impartiality, whether they arise within or outside the body. These procedures should clarify how conflicts of interest identified by inspection body personnel are reflected in reports and records. However, despite the fact that While the requirements for inspectors may be set out in policies and procedures, the existence of such documents does not guarantee the professional integrity and impartiality of the inspectors provided for in this paragraph.

**7.2 Support Equipment and Equipment**

**7.2.1** (6.2.3 k1) If it is necessary to check the environmental conditions, e.g. for the correct conduct of the inspection, the inspection body will carry this out and record the result. If the conditions are beyond the permissible level to permit an inspection, the inspection body shall record what measures have been taken. See See also clause 8.7.4.

**7.2.2 (6.2.3 k2) Continued suitability can be determined by visual inspection, functional verification and/or recalibration. This requirement is particularly relevant for equipment that is not subject to direct inspection by the inspection body.**

**7.2.3** (6.2.4 k1) Inspection bodies should document and maintain the rationale for decisions on the significance of the impact of equipment on inspection results, as these decisions are the basis for subsequent calibration and traceability decisions.

**7.2.4 (6.2.4 k2) In order to be able to control the replacement of equipment, it is advisable to assign an individual identification mark to each object, even if only one piece of equipment is available.**

**7.2.5** (6.2.4 k3) Where it is necessary to inspect environmental conditions, the equipment used for this purpose shall be regarded as having a significant impact on the outcome of the inspection.

**7.2.6 (6.2.6 k1) Justification for the presence of equipment which is not subject to calibration and which has a significant impact on the result of the inspection (see § 6.2.4) should be provided in the form of records.**

**7.2.7 (6.2.6 k2) Guidance on the determination of calibration intervals is provided in ILAC G24.**

**7.2.8** (6.2.6 k3) Where appropriate (for equipment referred to in § 6.2.6), the identification shall include the specified accuracy and measurement limits.

**7.2.9 (6.2.7 K1) In accordance with ILAC P10, internal calibration of the equipment used for measurements is permitted. The requirement to develop a policy to ensure that internal calibrations are carried out in accordance with the metrological traceability requirements in GOST ISO/IEC 17025 applies to accreditation bodies.**

**7.2.10 (6.2.7 k2) It is advisable for inspection bodies that seek to calibrate equipment through external organizations to act in accordance with ILAC P10.**

**7.2.11** (6.2.9 k1) In the event that equipment is inspected during operation between regular calibrations, the nature of such inspections, the frequency of inspections and the criteria for suitability of the equipment shall be determined.

**7.2.12 (6.2.10 k1) The information provided in 6.2.7 k1, 6.2.7 k2 and 6.2.9 k1 for equipment calibration programmes also applies to reference material calibration programmes.**

**7.2.13 (6.2.11 k1) In the event that the inspection body engages suppliers to perform work that does not include part of the inspection but that is relevant to the results of the inspection, such as recording orders, archiving, providing ancillary services during the inspection, editing inspection reports or providing calibration services, such work shall be referred to as "services" as used in this paragraph.**

**7.2.14 (6.2.11 k2) The inspection procedure shall ensure that the goods and services received are used only after they have been verified to conform to specification.**

**7.3 Conclusion of the subcontracting agreement**

 7.3.1 (6.3.1 k1) By definition (GOST ISO/IEC 17011, paragraph 3.1), accreditation refers to conformity assessment activities for which the inspection body has demonstrated its competence to carry out independently. Thus, accreditation cannot be granted for the activities described in subparagraph 4 of note 1 if the inspection body does not have the necessary competence and/or resources. However, the task of evaluating and interpreting the results is Such compliance activities may be included in the scope of accreditation if appropriate competence for this purpose has been demonstrated.

**7.3.2** (6.3.3 k1) Note 2 to the definition of "inspection" in paragraph 3.1 states that in some cases inspection can only be an analysis, without a subsequent determination of conformity. In such cases, paragraph 6.3.3 does not apply, as there is no definition of conformity.

**7.3.3 (6.3.4 k1) Accreditation is the preferred means of demonstrating the competence of a subcontractor, but in justified situations (based on qualified assessment/professional judgment) results from non-accredited bodies may be accepted.**

**7.3.4 (6.3.4 k2) In the event that the assessment of the subcontractor's competence is based in part or wholly on its accreditation, the inspection body shall ensure that the scope of the subcontractor's accreditation covers the activities performed under the subcontract.**

**8 PROCESS REQUIREMENTS**

**8.1 Inspection Methods and Procedures**

 **8.1.1**  (7.1.1 k1) If the inspection includes measurements, ILAC G27 provides guidance on determining the actual requirements.

**8.1.2** (7.1.1 k2) Recommendations from GOST ISO/IEC 17007 can be used to develop specific inspection methods and procedures.

**8.1.3** (7.1.1 k3) Many methods use the human eye to perform visual inspections. Increasingly, new technologies (e.g. drones, cameras, special glasses, IT, artificial intelligence, etc.) are being introduced during inspections. They can be a (partial) replacement of an existing inspection method (such as the human eye) or a new inspection method.

**8.1.4** (7.1.3 k2) Aspects that require attention in connection with the introduction of new technologies:

- Validation of a new or modified inspection method using new technologies. In the case of a (partial) replacement of an existing inspection method, it should be ascertained whether the inspection result is as (or more) reliable as the result of the existing method;

- applicable legal and security requirements (such as permits), legal restrictions and legal conditions;

- Current restrictions and conditions for the inspection method when using new technologies;

- whether the use of new technologies should be mentioned in the inspection report;

- whether mention should be made of the use of new technologies in the field of inspection and/or accreditation.

**8.1.5 (7.1.5 k1) Where necessary, the contract or work order control system should also ensure:**

- negotiation of the terms of contracts;

- Availability of appropriate competence of personnel;

- Definition of all statutory requirements;

- Definition of safety requirements

- Determining the scope of subcontracting agreements. For current or recurring work requests, the analysis may consist of time and resources. An acceptable record in such cases is the acceptance of a contract signed by a duly authorized person.

**8.1.6** (7.1.5 k2) In cases where verbal orders for work are permitted, the inspection body shall keep a record of all requests and instructions received orally. If necessary, the date of the order and the details of the customer's representative should be recorded.

**8.1.7 (7.1.5 k3) A system for monitoring contracts or work orders should ensure that the inspection body and its client have a clear and obvious understanding of the scope of work carried out by the inspection body.**

**8.1.8 (7.1.6 k1) The information referred to in this paragraph is not provided by the subcontractor but by another party, such as a regulatory authority or a client of the inspection body. The information may be for reference purposes for inspection activities, but does not include the results of the inspection.**

**8.2 Inspection Records**

**8.2.1** (7.3.1 k1) The records should indicate the specific piece of equipment used in the inspection activities and which has a significant impact on the outcome of the inspection.

**8.3 Inspection Reports and Certificates**

**8.3.1** (7.4.2 k1) ILAC P8 contains requirements for the use of accreditation symbols and applications for accreditation status.

**9 MANAGEMENT SYSTEM REQUIREMENTS**

**9.1 Variants**

**9.1.1 (8.1.3 k1) The expression "this International Standard" refers to** GOST ISO/IEC 17020.

**9.1.2** (8.1.3 k2) Option B does not require certification of the inspection body's management system for compliance with the requirements of ISO 9001. However, in determining the required degree of assessment, the accreditation body shall take into account whether the inspection body has been certified for compliance with ISO 9001 by a certification body, which in turn is accredited by an accreditation body that is a signatory to the IAF MLA Recognition Agreement. or a regional Recognition Agreement in the field of certification of management systems.

**9.2 Management System Documentation (Option A)**

**9.2.1 (8.2.1 k1**) Policies and objectives should take into account the competence, impartiality and consistency of the inspection body.

**9.2.2 (8.2.4 k1) For ease of reference, it is recommended that the inspection body indicate where the requirements of GOST ISO/IEC 17020 are mentioned, e.g. by compiling a table of cross-references.**

**9.3 Management System Requirements. Records Management (Option A)**

**9.3.1** (8.4.1 k1) This requirement means that the inspection body shall keep and keep all records necessary to demonstrate compliance with the requirements of the standard.

**9.3.2** (8.4.1 k1) Where an electronic signature or electronic authorization is used for the purpose of endorsement, access to electronic means of information or the seal should be secure and controlled.

**9.4 Management System Requirements. Management review (Option A)**

**9.4.1** (8.5.2 k1) An analysis of the impartiality risk identification process and conclusions (paragraphs 4.1.3/4.1.4) should be included in the management's annual report.

**9.4.2** (8.5.2 k2) The management review should take into account the availability of the necessary personnel and equipment, the projected workloads and the need for training for both existing and new staff.

**9.4.3** (8.5.2 k3) Management review should include an analysis of the performance of systems designed to ensure adequate competence of staff.

**9.5 Management System Requirements. Internal Audits (Option A)**

**9.5.1** (8.6.4 k1) The inspection body should ensure that the internal audit programme covers all the requirements of GOST ISO/IEC 17020 as part of the accreditation cycle. These requirements should apply to all areas of the inspection and to all premises in which inspection activities are organized and carried out. The inspection body should justify the established frequency of the audit with respect to the different types of requirements, the scope of the survey and the premises in the conduct of the audit planning.

The rationale may take into account the following factors:

-responsibility

- level of development,

- previous activities,

- organizational changes,

- procedural changes,

- Effective exchange of experience between representatives of different places of activity and fields of activity.

**9.5.2** (8.6.4 k2) Internal audit is an important tool that should be used by the inspection body with sufficient frequency to monitor its ability to consistently comply with the requirements of GOST ISO/IEC 17020. When the inspection body detects problems that affect the implementation of any requirement of GOST ISO/IEC 17020 (e.g., an increase in the number of complaints and appeals, unsatisfactory results of external audits, comments on qualifications It should consider increasing the frequency and depth of internal audits and/or broadening their scope to include other locations and areas of inspection.

**9.5.3** (8.6.5 to1) Internal audits may be conducted by competent, contracted personnel.

**9.6 Management System Requirements. Preventive Actions (Option A)**

**9.6.1 (**8.8.1 k1) Preventive actions shall be taken at the preliminary stage of identifying potential nonconformities and identifying opportunities for improvement, but not in response to identified nonconformities, problems or complaints.

**9.7 Annex A: Independence Requirement for Inspection Bodies**

**9.7.1**  (A k1) of Annexes A.1 and A.2 of GOST ISO/IEC 17020 refer to the phrase "objects to be inspected" in relation to type A and type B inspection bodies (paragraph 4.1.6 k1 clarifies cases where an inspection body may have different types of independence).

Annex A.1b states: "In particular, they shall not be involved in the design, production, supply, introduction, acquisition, possession, use (operation) of the facilities inspected."

Annex A.2c states: "In particular, they shall not be involved in the design, manufacture, supply, introduction, use (application, operation) or maintenance of the facilities they inspect." The reference to "they" in the above proposals refers to the inspection body and its personnel. Objects in this case are those specified in the accreditation certificate/annex for the accredited area of the inspection body (e.g. pressure vessels).

**9.7.2** (A k2) The provision of consulting services in the design, production, supply, implementation, acquisition, application or maintenance of inspected facilities is also considered to be a contradictory activity.

**9.7.3** (A k3) "Regulated requirement" means that an exemption has been formalized by law and/or when the regulatory authority provides publicly available guidance stating that the exemption is permissible when it is carried out as part of a regulated inspection activity.

**Annex 1**

**Possible Format for Impartiality Risk Analysis (Reference)**

Paragraph 4.1.3 requires the inspection body to continuously identify impartiality risks, and paragraph 4.1.4 requires the inspection body to demonstrate how it eliminates or minimizes such risks. In fact, the combination of these two points points points to the need for an "analysis of the risk of impartiality". Although this term "impartiality risk analysis" is not mentioned in GOST ISO/IEC 17020, it is used in this application note as a common term by which the inspection body may consider the requirements of paragraphs 4.1.3 and 4.1.4.

The actions by which the inspection body shows how it eliminates or minimizes identified impartiality risks in practice are often referred to as "control measures". This term is also not mentioned in GOST ISO/IEC 17020.

A possible format for an impartiality risk analysis is shown in Table 1.

Table 1

|  |  |  |  |
| --- | --- | --- | --- |
| **Situation** | **Risk impartiality** | **Control measure and its monitoring** | **Where is the control measure (procedure, instruction, form, application) embedded in the management system?** |
| **1. Activities of the Inspection Body** |
| -  |  |  |  |
| -  |  |  |  |
| -  |  |  |  |
| - |  |  |  |
| **2. Relationship of the Inspection Body** |
| -  |  |  |  |
| -  |  |  |  |
| -  |  |  |  |
| - |  |  |  |
| **3. Staff Relations** |
| -  |  |  |  |
| -  |  |  |  |
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**Annex 2**

**Relationship between impartiality and Type A independence requirements (reference)**

- Impartiality (defined as the presence of objectivity) is a basic requirement;

- the impartiality of the inspector is realized when the inspector necessarily demonstrates objectivity in his judgment;

**1. Risks to be mitigated by meeting** the Type A independence requirements - Compliance with the Type A independence requirements eliminates the impartiality risks associated with engaging in activities that may conflict with independence of judgment and credibility regarding the inspection activity; - Type A independence requirements provide for increased confidence in impartiality and exclude only certain impartiality risks. This means that data compliance does not exclude all risks of impartiality; - other impartiality risks must be identified (clause 4.1.3) and minimized or eliminated (clause 4.1.4);

**2. Impartiality Risk Analysis and Control Measures**

- in fact, the identification of potential impartiality risks is often referred to as an "impartiality risk analysis**", and the minimization or elimination of impartiality risks under clause 4.1.4 is often referred to in practice as** "control measures";

- Impartiality risk analysis is required for all three types of independence (Type A, Type B and Type C);

- A.1b and A.1.c are binary (yes or no), i.e. partial compliance with Type A independence requirements is not possible. It also means that the risk analysis that results from controls to minimize the risks of impartiality in a situation where these Type A requirements are not met, is not possible. Therefore**, it is only possible to remedy a situation that does not meet the requirements of type A**;

- Type A A.1d independence requirements can be met through control measures as a result of a risk analysis; - Assessing whether an inspection body complies with the requirements of type AA.1b and A.1c independence may be difficult in some individual situations (depending on the facilities being inspected and the characteristics of the market), but the result should be in the form of "yes or no";

**3. Inspected Objects**

- the term "inspected facilities" is mentioned in Annex A of the GOST ISO/IEC 17020 standard (clause A.1b/c) and is specified in this document ILAC-P15 in paragraph A k1;

- this clarification in ILAC-P15 was dictated by the need to prevent possible market influence or possible influence from the market, which also does not allow commercial/financial pressure on the inspection body and/or its personnel (e.g. inspectors);

- Inspection bodies can work in markets with different features in terms of the number of suppliers/manufacturers:

• Markets with a limited number of suppliers/manufacturers, e.g. elevators, automobiles, pressure equipment;

• Markets with a large number of suppliers/producers, e.g. in the agri-food sector.

This type of divergence in the market situation does not affect the interpretation of paragraph A to 1 ILACP15. Inspection bodies and their inspectors should not work with inspected facilities as specified in the scope of accreditation, but should not be limited to specific/unique/individual facilities that are subject to inspection by the inspection body.

**4. Type A/Type C**

In some sectors of economic activity, where potential external inspectors are in most cases working with the facilities being inspected, it may be difficult to meet the A.1b and A.1c independence requirements; It should be noted that the impartiality and competence requirements for Type A and Type C are the same, only the independence requirements differ.

**Change Logging Sheet**

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| Change Sequence Number | No. of the Order on Approval/Enactment  | Date of approval/implementation | Item of Changed Position | Signature of the person who made the change | Deciphering the signature of the person who made the change |
| 1 | 2 | 3 | 4 | 5 | 6 |
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