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Non-destructive testing — Interpretation of EN ISO/IEC 17024 for NDT personnel certification application

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National foreword

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Essais non destructifs - Interprétation de l'EN ISO/CEI
17024 pour l'application de la certification du personnel
END

Zerstörungsfreie Prüfung - Interpretation von EN ISO/IEC
17024 für ZfP-Personal zertifizierungsanwendungen

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Foreword

This document (CEN/TR 16332:2012) has been prepared by Technical Committee CEN/TC 138 “Non-destructive testing”, the secretariat of which is held by AFNOR.

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. CEN [and/or CENELEC] shall not be held responsible for identifying any or all such patent rights.

In this document the words “EN 473” are used to designate EN 473 itself or 3rd party international standards or national sector specific 3rd party NDT-standards/schemes in line with EN 473. The present document, which incorporates much of the general guidance from IAF Guide 24, was prepared by a Task Group of CEN/TC 138 to provide guidance to accreditation bodies assessing personnel certification bodies for compliance with EN ISO/IEC 17024 whilst implementing EN 473.

Introduction

Accreditation in Europe is voluntary, but assessment and approval by government appointed agencies, which may also be accreditation bodies, may become mandatory in regulatory sectors such as Pressure Equipment (Pressure Equipment Directive 97/23/EC).

In Europe, personnel requiring to hold independent (3rd party) certification of competence to carry out non-destructive testing (NDT) are qualified and certificated in accordance with the provisions of EN 473. EN 473 becomes the normative document referred to in IAF Guide 24:2003, clause 4.2.27 "The certification body is allowed to explain its findings and/or clarify the requirements of the normative documents ...".

It is intended that this technical report be used in place of IAF Guide 24, since the latter is general by nature and, in places, could conflict with the normative criteria of EN 473, which is specific to the qualification and certification of personnel for non-destructive testing.

1 Scope

This European Standard is a CEN Technical Report (CEN/TR) on the application of EN ISO/IEC 17024 specifically for the implementation of EN 473.

The guidance provided is in sequence with the criteria of EN ISO/IEC 17024:2003, and makes direct reference to EN 473 where no guidance is considered necessary because EN 473 provides the necessary detail.

It is important to note that the guidance provided herein is specifically for certification bodies implementing EN 473, and not for employers implementing EN 4179:2009 which includes, in Clause 2, a normative reference to EN ISO/IEC 17024:2003.

2 Normative references

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

EN 473:2008, *Non-destructive testing — Qualification and certification of NDT personnel — General principles*

EN ISO/IEC 17024:2003, *Conformity assessment — General requirements for bodies operating certification of persons (ISO/IEC 17024:2003)*

3 Terms and definitions

For the purposes of this document, the following term and definition applies

3.1

accreditation

procedure by which an authoritative body gives formal recognition that a body is competent to carry out certification according to EN 473

4 Requirements for certification bodies

4.1 Certification body

Due to the general character of the requirements in EN ISO/IEC 17024 and the specificities of the NDT personnel certification scheme in EN 473, differing interpretation of requirements may occur, resulting in conflicts between the accreditation and the certification body. It is recommended that such conflicts be dealt with under the general principles of appeal mechanisms, i.e. ruled by an arbitration body composed of a representative of both parties and an independent organization agreed by both parties.

4.2 Organizational structure

4.2.1 Refer to EN 473. Accreditation shall only be granted to a body which is a legal entity as referenced in EN ISO/IEC 17024:2003, clause 4.2.1 d) and will be confined to declared scopes, activities and locations. If the certification activities are carried out by a legal entity which is part of a larger organization, the links with other parts of the larger organization shall be clearly defined and should demonstrate that no conflict of interest exists. Relevant information on activities performed by the other parts of the larger organization shall be given by the certification body to the accreditation body and shall be maintained up-to-date.

Demonstration that a certification body is a legal entity, as required under EN ISO/IEC 17024:2003, 4.2.1 d) means that if an applicant certification body is not itself a legal entity but is part of a larger legal entity, accreditation shall only be granted to the entire legal entity. In such a situation, the structure of the entire legal entity may be subject to audit by the accreditation body in order to pursue specific audit trails and/or review records relating to the certification body. The part of the legal entity that forms the actual certification body may trade under a distinctive name, which together with the name of the legal entity should also appear on the accreditation certificate.

For the purposes of EN ISO/IEC 17024:2003, 4.2.1 d) certification bodies which are part of government, or are government departments, will be deemed to be legal entities on the basis of their governmental status. Such bodies' status and structure shall be formally documented and the bodies shall comply with all the requirements of EN ISO/IEC 17024. If the decision to issue, withhold or withdraw certification in accordance with EN ISO/IEC 17024:2003, 4.2.1.c) 3) is taken by a committee comprising, among others, representatives with a vested interest in the person subject for decision, the operational procedures of the certification body should ensure that these representatives declare a conflict of interest and do not participate in the certification decision.

Impartiality and independence of the certification body should be established at all levels including:

- structure of the organization;
- policies and procedures;
- evaluation;
- decisions and appeals on certification.

A certification body should not certify a person it employs unless no appropriate accredited third party exists in its own country or is available in practice to undertake the certification. Where such cases could arise, a certification body shall demonstrate to the accreditation body the procedures it has adopted in order to maintain independence and impartiality in such circumstances. These could include:

- maintaining the same standards of evaluation and confidentiality towards all candidates;
- the use of independent examiners;
- independent monitoring of the certification process.

The certification body shall require examiners to declare any information that may reveal a conflict of interest regarding the impartiality of the candidate's examination. The certification body has the responsibility to identify and evaluate such situations and to assign responsibilities and tasks so as to ensure that impartiality is not compromised.

The responsible management, staff and/or personnel mentioned in EN ISO/IEC 17024:2003, 4.2.7 need not be exclusively engaged by the certification body, but their other employment shall not be such as to compromise their impartiality.

4.2.2 Refer to EN 473:2008, 5.1.2. The certification body shall not engage in activities that could compromise its impartiality.

EN ISO/IEC 17024:2003, 4.2.2 provides that the certification body should not allow commercial or other considerations to influence the confidentiality, objectivity or impartiality of the certification process. Conformity with this clause is particularly relevant when the financial resources to set up a certification body have been provided by a particular interest that predominates in the shareholding and/or the board of directors.

EN ISO/IEC 17024:2003, 4.2.2 requires that the documented structure of the certification body has built into it provision for the participation of all the significantly concerned parties in the different sectors in which it operates, including the consideration of public interest. This should normally be through some kind of committee. This structure shall be formally established at the highest level within the organization either in the documentation that establishes the certification body's legal status or by some other means that prevents it being changed in a manner that compromises the safeguarding of impartiality. Any change in this structure should take into account advice from the committee, or equivalent, referred to in EN ISO/IEC 17024:2003, 4.2.2.

Application of EN ISO/IEC 17024:2003, 4.2.2 requires judgement on whether all parties significantly concerned in the system are able to participate. What is essential is that all identifiable major interests should be given the opportunity to participate, and that a balance of interests, where no single interest predominates, is achieved. For practical reasons there may be a need to restrict the number of members.

On request of the committee or equivalent referred to in EN ISO/IEC 17024:2003, 4.2.2 the management responsible for the various functions described in EN ISO/IEC 17024:2003, 4.2.1 c) should provide to that committee or equivalent all the necessary information. This includes the reasons for all significant decisions, actions, and the selection of persons responsible for particular activities, in respect of certification, to enable the certification body to ensure proper and impartial certification. If the advice of this committee or equivalent is not respected in these matters by the management, the committee or equivalent shall take appropriate measures, which may include informing the accreditation body.

The committee or equivalent referred to in EN ISO/IEC 17024:2003, 4.2.2 may also be the scheme committee provided it has the required technical competence to also act as a scheme committee for one or more schemes as appropriate.

4.2.3 The certification body shall form a scheme committee to define procedures or requirements and rules necessary for the reliable execution of all tasks of the certification body which are not covered by the documents cited in Clause 2. This includes at least:

- professional ethical rules;
- requirements for examiners;
- control of test equipment and material;
- maintenance of examination questions and test specimen;
- examination rules;
- complaint procedures;
- rules for confidentiality/data security;

For special tasks, the scheme committee may form subcommittees. When discussing examination related tasks, the relevant subcommittee should be predominantly composed of NDT individuals certified to level 3.

4.2.4 The requirement for financial resources referred to in EN ISO/IEC 17024:2003, 4.2.4 a) requires the certification body to demonstrate that it has a reasonable expectation of being able to continue to provide the accredited service in accordance with its contractual obligations. Certification bodies are responsible for providing the accreditation body with sufficient evidence to demonstrate viability, e.g. management reports or minutes, annual reports, financial audit reports, or financial plans. Accreditation bodies should not attempt any direct audit of the financial accounts of certification bodies.

A related body is one which is linked to the certification body by common ownership in whole or part and has common members of the board of directors, contractual arrangements, common names, common staff, informal understanding or other means such that the related body has a vested interest in any certification decision or has a potential ability to influence the process. Although there is no specific restriction on the services or activities that a related body may provide, the certification body should analyze and document their relationship to determine the possibilities for any known conflicts of interest with provision of certification. The certification body should identify those bodies and their activities that could, if not subject to appropriate controls, affect confidentiality, objectivity or impartiality.

Certification bodies shall demonstrate how they manage their certification business and any other activities so as to eliminate actual conflict of interest and minimize any identified risk to impartiality. The demonstration shall cover all potential sources of conflict of interest, whether they arise from within the certification body or from the activities of related bodies. Accreditation bodies will expect certification bodies to open these processes for audit. This may include, to the extent practicable and justified, pursuit of audit trails, to review records of both the certification body and its related body for the activity under consideration. In considering the extent of such audit trails, account should be taken of the certification body's history of impartial certification. If evidence of failure to maintain impartiality is found, there may be a need to extend the audit trail back into related bodies to provide assurance that control over potential conflicts of interest.

4.2.5 The requirements of EN ISO/IEC 17024:2003, 4.2.5 and 5.1.2 mean that personnel should not be allowed to conduct an evaluation as part of the certification process if they have been involved in related training activities associated with the evaluation of the candidate in question, within the last two years.

The certification body should require all evaluation subcontractors or external examiners to give assurances regarding the marketing and provision of any activities under EN ISO/IEC 17024:2003, 4.2.4 c).

Information regarding education and training may be provided in literature by the certification body if they are used as pre-requisites for being eligible for certification or part of an examination preparation booklet. All known education and training prerequisites related to the certification scheme should be listed and publicly available. However, nothing should be said or indicated by a certification body that would suggest that certification would be simpler, easier or less expensive if any specified education/training services were used.

Where the certification body provides certification and education/training services, it shall ensure that no impression is given that the use of both services would bring any advantage to the applicant, so that the certification process remains, and is seen to remain, impartial.

The certification body is allowed to explain its findings and/or clarify the requirements of the normative documents but shall not give prescriptive advice or training as part of an evaluation. This does not preclude normal exchange of information with the applicant or candidate and other interested parties.

4.2.6 EN ISO/IEC 17024:2003, 4.2.1 b) requires the certification body to be responsible for certification decisions. Any appeal procedure, see EN ISO/IEC 17024:2003, 4.2.6 should therefore be within the control of the certification body, but any appeal panel or committee shall be independent in their recommendations except as required by international or national law.

The policies and procedures referred to in EN ISO/IEC 17024:2003, 4.2.6 should ensure that all appeals and complaints are dealt with in a constructive and timely manner. Where operation of such procedures has not resulted in the acceptable resolution of the matter, or where the proposed procedure is unacceptable to the complainant or other parties involved, the certification body's procedures shall provide for an appeals process. The appeals procedure should include provision for the following:

- the opportunity for the appellant to formally present its case;
- provision of an independent element or other means to ensure the impartiality of the appeals process;
- provision to the appellant of a written statement of the appeal findings including the reasons for the decisions reached;
- clear definition of the time limit for the appeal process. The certification body shall ensure that all interested parties are made aware, as and when appropriate, of the existence of the appeals process and the procedures to be followed.

Personnel, including those acting in a managerial capacity, should not be allowed to decide on any appeal or complaint if they have been involved in the certification process for that applicant or candidate, or in training or education activities towards the applicant or candidate within the last two years, or had any previous involvement in any activities leading to the appeal or complaint in question.

Appeals and complaints represent a source of information as to possible nonconformity. On receipt of a complaint the certification body shall establish, and, where appropriate, take action on the cause of any nonconformity found.

The certification body should use such investigations to perform correction and/or corrective action, which should include measures for:

- minimizing the consequences of any nonconformity;
- restoring conformity with certification requirements as quickly as practicable;
- preventing recurrence of the nonconformity;
- assessing the effectiveness of the correction or corrective measures adopted.

4.2.7 The term "personnel" can include individual persons who work for the certification body on a contract basis, or other external resources. The certification body shall be in a position to manage, control and be responsible for the performance of all its resources and maintain comprehensive records controlling the suitability of all the staff it uses in particular areas, whether they are employees, employed on contract or provided by external bodies.

The certification body should be responsible for ensuring that neither related bodies, nor sub-contractors, nor external examiners operate in breach of the undertakings that they have given. It should also be responsible for implementing appropriate corrective action in the event that such a breach is identified.

4.3 Development and maintenance of a certification scheme

4.3.1 EN 473 defines entirely the methods and mechanisms for evaluation of the candidates. Continued maintenance is ensured through the process of periodical review of EN 473 under CEN regulations.

4.3.2 Scheme validation, as described in EN ISO/IEC 17024, may include one or more of the following activities:

- Review and approval of each multi-choice answer examination question, assigning a 'level of difficulty' to each question;
- Compilation of examination scripts, choice of questions in such a way that a median 'level of difficulty' (within a defined range) is achieved for each examination paper, and independent review of compiled papers prior to authorisation for use;
- Conduct of written 'pilot' examinations; review of the examination pass rates for each individual examination question and for each compiled paper used in pilot examinations; amendment or adjustment of the questions to achieve the desired level of difficulty;
- Open and/or blind trials on practical examination specimens, with interviews of testing personnel following the test;
- Random review candidate reports of tests on examination specimens, adjustment of master reports in the light of experience.

Process audits covering:

- review of applications,
- allocation of examination resources,
- setting up and conducting examinations,
- marking examinations;
- issuing of results and certificates, and
- raising, storage maintenance and retrieval of records.

4.3.3 Any change to the certification scheme shall comply with the minimum requirements in EN 473, but it may introduce supplementary requirements over and above the minimum criteria of the standard with the informed consent of the scheme committee.

Changes in the requirements for certification shall be announced in an appropriate publication which shall state the intended date for implementation, which should not be sooner than three calendar months after the public announcement.

The certification body shall verify that each certified person complies with the changed requirements at the next renewal or recertification as defined by the scheme committee.

4.3.4 Refer to EN 473 for evaluation criteria.

4.3.5 Membership of an appropriate professional society may be recognized when constructing criteria for renewal or recertification (see EN 473:2008, Annex C). Refer also to EN 473:2008, 6.2 relative to the training.

4.3.6 Data should be collected and analysed to maintain an overview of the relative examination pass rates in order to detect significant changes.

4.4 Management system

Continual improvement, in the sense of EN 473, is achieved through the use of quality objectives, audit results, analysis of data, corrective and preventive actions and management review.

4.5 Subcontracting

4.5.1 In EN 473, the only permitted case of subcontracting is through qualification bodies and examination centres; rules and responsibilities are defined in EN 473.

4.5.2 In the event that examinations are subcontracted to a training provider, special care should be taken regarding separation of training and examination as part of the certification process (EN ISO/IEC 17024:2003, 4.2.5). Where joint assessment of a subcontractor is undertaken by two or more certification bodies, each certification body shall satisfy itself that the whole of the assessment has been satisfactorily undertaken.

4.6 Records

Refer to EN 473. Records should be:

- maintained in such a manner that ensures retrievability;
- stored in a manner that prevents damage and deterioration;
- uniquely identified.

4.7 Confidentiality

The requirement regarding confidentiality includes anyone who might gain access to information within the certification body. Subcontracted personnel shall also be required to maintain all such confidential information, particularly from fellow employees and from their other employers.

Policies and procedures and/or regulatory requirements for the maintenance and release of information shall be maintained.

Certification body staff should be required to give a written undertaking to respect the confidentiality of information available to them in the course of their association with the certification body. This requirement also applies to committee members and, in this case, the completed form shall be signed and returned to the certification body manager prior to attendance at any committee meeting by the individual concerned. Signed undertakings shall be retained as records.

4.8 Security

The certification body should determine measures necessary to ensure security throughout the certification system, including arrangements for the transport and handling of examination material.

Security measures may include:

- secure storage of the examination bank;
- protection of electronic data.

The certification body should exercise special care if it subcontracts examinations to training providers as it has inherent risk of compromising impartiality and/or security. Special care may include e.g. procedures for separation between examination materials and training materials.

5 Requirements for persons employed or contracted by a certification body

5.1 General

5.1.1 Examiners shall have a valid EN 473 Level 3 certificate in the method concerned.

A certification body shall have personnel competent to:

- review applications;
- authorize and select examiners;
- prepare, administer, monitor, grade and evaluate examinations;
- assess subcontractors, e.g. examination centres;
- handle nonconformities, appeals and complaints;
- decide on certification;
- implement and maintain a management system.

The management of the certification body shall have the resources and procedures to determine whether its individuals are competent for the tasks they are required to perform within the scope of certification in which they are operating. The competence of individuals may be established by verified background experience, specific training or briefing. The certification body should be able to communicate effectively with all those whose services it uses.

5.1.2 See Annex B for a model paper.

5.1.3 All certification body technical and managerial staff, and all scheme committee members, should be required to submit a copy of their CV in order to show that they are appropriately qualified for their assigned role. CVs are held as records, and should be reviewed periodically.

All certification body staff should be trained for their specific responsibilities, which should be documented in terms of reference for each certification body staff position. Further training needs should be identified periodically, and all training provided should be recorded.

It is essential that certification body staff remain familiar with all quality documentation affecting their work. To achieve this, staff should signify familiarity with each newly issued or revised document circulated by the certification body Manager to all certification body staff, who should read the document and sign as having done so. Signed circulation slips are retained as records.

5.2 Requirements for examiners

EN 473 ensures compliance with these requirements.

6 Certification process

6.1 Application

6.1.1 EN 473 ensures compliance with these requirements and need not be reproduced in Scheme documentation, which may merely make reference to the applicable standard(s) in its Scheme document. Details of the Scheme operations not covered in EN 473 (such as fees, applicant's rights, procedures for suspension/withdrawal of certificates etc.), should be provided. EFNDT provides a Code of Practice for

certification bodies registered under its MRA, and guidance on an NDT code of ethics for candidates and certificated personnel.

6.1.2 The application form developed for this purpose should ensure that the candidate provides all of the information and data required by EN 473.

6.2 Evaluation

6.2.1 Refer to EN 473. Policies and procedures for determining reasonable accommodations (e.g. assistance with reading, extended length of time for examination, large print examination questions) shall be documented and available to all interested parties and meet any governmental requirements. The certification body should ensure that it is able to provide examination of individuals with special needs unless the applicant's disability would prohibit certification under the scheme for the certified person.

6.2.2 EN 473 ensures compliance with these requirements.

6.2.3 The NDT qualification examination structure is described in EN 473.

6.2.4 The NDT qualification examinations defined in EN 473 contain separate general and specific written examinations, and a practical examination, each of which is marked separately against criteria defined in EN 473, and the results notified to the candidate.

6.3 Decision on certification

6.3.1 A Certification Body procedure should define the criteria on which a decision to certificate or withdraw certification is based. The procedure should be approved by the Scheme Committee. In addition, the certification body shall nominate the person(s) making the decision on certification, among others on the basis of suitable knowledge and experience of NDT, and of the evaluation process. Being certificated to EN 473 is not a requirement.

6.3.2 The certificate should include a statement concerning ownership.

6.3.3 Refer to EN 473.

6.4 Surveillance

EN 473 provides surveillance in the form of Renewal criteria.

6.5 Recertification

EN 473 provides a detailed process for recertification.

6.6 Use of certificates and logos/marks

6.6.1 The certification body should avoid using the same mark to indicate different conformity assessment systems, and should avoid confusion between the meaning of its marks if there is more than one. This does not exclude the use of the same corporate logo in different marks for different systems of conformity.

The certification body should have documented procedures for the use of its mark, and for the procedures it is to follow in case of misuse, including false claims as to certification and false use of its marks.

If a certification body incorrectly claims accredited status for certificates issued before appropriate accreditation has been granted, the accreditation body shall require it subsequently to withdraw them.

A certification body should have procedures to ensure that its certified persons do not use its mark in a way that may be likely to confuse employers or other parties.

Where the certification body makes use of a mark, which it has been assigned by another body, e.g. the owner of the mark, its agreement with that body shall ensure conformity with the intent of all sections of this clause.

6.6.2 The application for examination should include a section for signature by the candidate in which he or she undertakes to abide by a code of ethics, which addresses all of the requirements of EN ISO/IEC 17024:2003 6.6.2, as well as the additional requirements of the applicable standard(s) and the Scheme Committee.

The published Scheme documentation should include a statement that certificate holders are not permitted to make inappropriate references to the certification, or use marks or logos in publications, catalogues, etc. in a misleading manner.

6.6.3 No guidance needed.

Annex A (informative)

Development and maintenance of a certification scheme for persons

Not applicable in the case of NDT personnel certification according to methods defined in EN 473.

For NDT personnel certification, any certification scheme related to a new method shall apply the same principles as defined in EN 473 and shall as a minimum contain requirements on the same criteria than EN 473 (physical capability, training, experience, examination).

Annex B
(informative)

Model for engagement of the personnel involved in the certification process of NDT personnel according to EN 473 or ISO 9712

Name of the Certification Body	ANNEX 1 Model for engagement of the personnel involved in the certification process of NDT personnel according to EN 473:2008 or ISO 9712 :2005	Réf.
Title :		Page
<p>In undersigning the present document, the personnel involved in the certification process of NDT personnel according to EN 473 or ISO 9712 engages himself to respect following rules: -all technical or other nature information that they could receive during a testing or certification operation shall be treated confidentially. It is strictly forbidden to communicate those information about the documents used for examinations which are not of public access (specific questionnaires, practical examinations...) and to communicate to other people than those of the concerned body the discussions and decisions of the examination jury and the examination results. It is necessary to know and apply the current rules for qualification and certification and to promote the certification system. It is forbidden to get involved or associated into any misdemeanour concerning the rules for certification and it is necessary to act with impartiality and equity -carry out rigorously and impartially all certification operations and particularly the relationship with the candidates Signature of the person involved in the certification process. This document shall be undersigned before starting to work in the certification process</p>		
Date	Name	Signature

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- [1] IAF Guide 24:2003, *Guidance on the implementation of EN ISO/IEC 17024:2003 by accreditation bodies*
- [2] EN 4179:2009, *Aerospace series — Qualification and approval of personnel for non-destructive testing*
- [3] Directive 97/23/EC of the European Parliament and of the Council of 29 May 1997 on the approximation of the laws of the Member States concerning pressure equipment
- [4] ISO 9712:2005, *Non-destructive testing — Qualification and certification of personnel*

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