

Accreditation of third-party service providers – radiation competency assessment



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Disclaimer

This publication is a guide only and does not necessarily provide adequate information in relation to every situation. This publication seeks to explain your possible obligations in a helpful and accessible way. In doing so, however, some detail may not be captured. It is important, therefore, that you seek information from the EPA itself regarding your possible obligations and, where appropriate, that you seek your own legal advice.

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Summary

In South Australia individuals and organisations can apply to be accredited as certifiers of the competency of applicants seeking an EPA licence. This policy sets out how the Environment Protection Authority (EPA) will implement the system for accrediting third-party certifiers. It is aimed at staff making determinations on accreditation and applicants seeking to be accredited to issue certificates of competency.

The authority to accredit third-party service providers requires assessment that an applicant for accreditation has appropriate skills, qualifications, knowledge or experience. To provide assurance that third-party service providers meet the requirements for accreditation, the EPA has developed this accreditation policy based on the Australia/New Zealand Standard AS/NZS ISO/IEC 17024:2013 *Conformity assessment – General requirements for bodies operating certification of persons*.

The policy specifies the requirements necessary to ensure that persons operating certification schemes operate in a consistent, comparable and reliable manner. By setting and maintaining standards, accreditation provides assurance that applicants for an authorisation have appropriate knowledge of the principles and practices of radiation protection

1 Introduction

The Environment Protection Authority (EPA) administers the [Radiation Protection and Control Act 1982](#) (RPC Act) which provides for the accreditation of third-party service providers by the Minister. This includes accreditation to issue certificates of competency in relation to matters regulated under the RPC Act, such as authorisation to use or handle radioactive material or to operate radiation apparatus.

The RPC Act requires the Minister to be satisfied that an applicant for accreditation has appropriate skills, qualifications, knowledge or experience to properly carry out the activities authorised by the accreditation. This policy provides the basis for making that assessment. It explains the criteria against which an applicant for accreditation will be assessed, the information required to be submitted in support of an application, and the process to be followed in making decisions.

Figure 1 illustrates the roles and responsibilities of the EPA, certifiers and licensees.

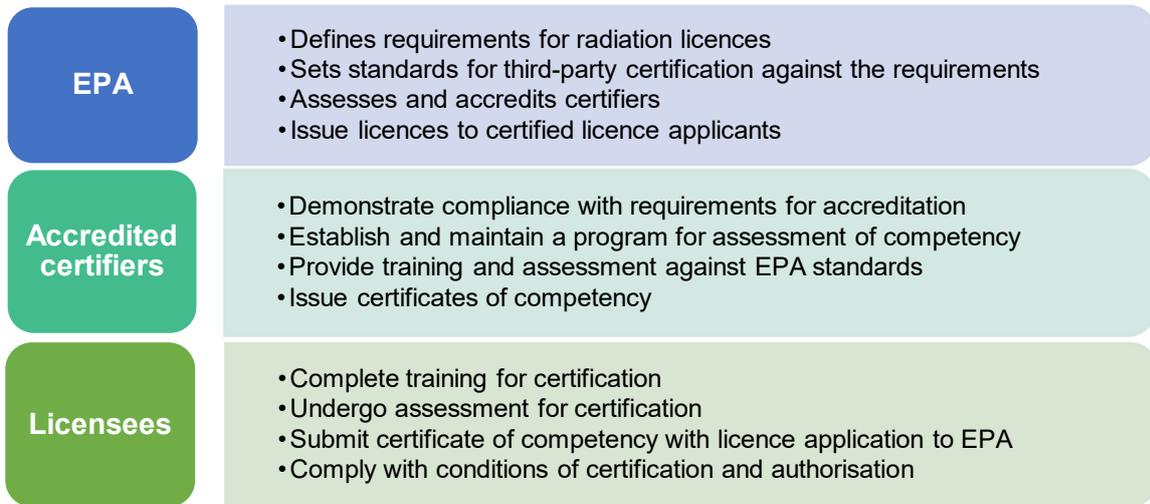


Figure 1 Overview of roles and responsibilities

The objective of the policy is to introduce a system of third-party certification of competence that will provide assurance that persons who receive certification have the knowledge, skills, and professional capabilities necessary to safely and competently undertake the activity to which the certification relates.

The intent is to ensure that the approach to the assessment of applicants for accreditation and decision to grant accreditation are administered in a consistent, accurate, impartial and fair manner. To this end, the EPA has based this policy on the *Australia/New Zealand Standard AS/NZS ISO/IEC 17024:2013 Conformity assessment – General requirements for bodies operating certification of persons*.



2 Principles

2.1 General principles

- **Safe and competent use of radiation**

The overarching guiding principle for the accreditation scheme is the safe and competent use of radiation. For this, the EPA will rely on demonstrated compliance with nationally and internationally accepted standards and practices in line with the radiation protection principle in the National Directory for Radiation Protection (NDRP).

The EPA will assure that certification by an accredited person is adequate to ensure that an applicant for an EPA licence is competent to carry out the activities authorised by the licence in a safe manner.

- **National consistency**

Harmonisation of radiation protection in Australia is a priority of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and all the States and Territories. This includes the aim of establishing common competency requirements and their consistent application across jurisdictions over time.

- **An efficient scheme**

The EPA is seeking a scheme that is effective and efficient, and adopts a graded approach where the stringency of the control measures is commensurate, with the level of risk and impact.

2.2 Policy specific principles

This policy does not give specific requirements for every eventuality. These principles should be applied as guidance for decisions in case of unanticipated situations:

- The overall purpose of certification of persons is to recognise an individual's competence to operate, use or handle the radiation source required to perform a particular task or job.
- The accredited certifier has a responsibility to ensure that only those persons who demonstrate competence are awarded certification.
- Certification of persons provides value through public confidence and trust based on a reliable assessment of competence.
- The accredited certifier should act in a responsible manner to provide confidence to interested parties in its competence, impartiality and integrity.
- Certification should be based on objective evidence through a fair, valid and reliable assessment.
- The accredited certifier should be impartial and competent to give confidence in their certification activities and outcomes.
- Managing the balance between confidentiality and openness affects stakeholders' trust and their value in the certification process.
- The effective resolution of complaints and appeals is an important means of protecting parties against errors, omissions and unreasonable behaviour.
- The accredited certifier has the responsibility to obtain sufficient objective evidence upon which to base a certification decision.

3 Eligibility

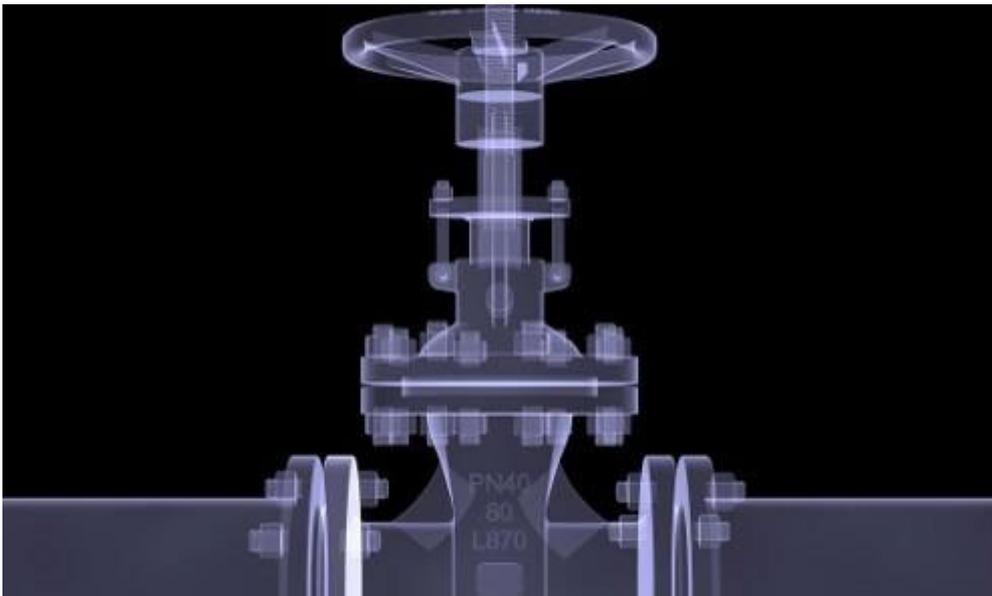
The RPC Act requires that an applicant for accreditation must have appropriate skills, qualifications, knowledge or experience to properly carry out the activities authorised by the accreditation. A person who applies for accreditation must demonstrate that they have adequate experience and expertise in relation to the proposed competencies to be issued certification.

To be eligible for accreditation, an applicant must hold an appropriate qualification in a relevant discipline or have appropriate skills, knowledge or experience in the relevant area of radiation practice to the satisfaction of the Minister or his delegate. This includes knowledge and understanding of the provisions of the RPC Act and regulations, and of codes of practice, standards and guidelines that apply to the relevant area of accreditation. Where relevant, the applicant must also have demonstrated competence in training delivery and assessment.

The applicant must demonstrate the ability to put the knowledge and understanding relating to the particular area of radiation into practice to a satisfactory degree.

An applicant may be required to undergo an identity check and/or a security background check.

In the case of an applicant who is a natural person, the applicant must be a fit and proper person to hold an accreditation of the kind applied for. In the case of an applicant that is a body corporate, every member of the governing body that holds the accreditation must be a fit and proper person.



4 Process

Invitations for accreditation will be open once or twice a year, depending on the level of interest. The EPA will give notice in advance about the commencement of each assessment process and potential candidates will be required to register their interest by a specified date to ensure adequate planning and assignment of resources for the assessment process.

Figure 2 demonstrates the authorisation process of each application.

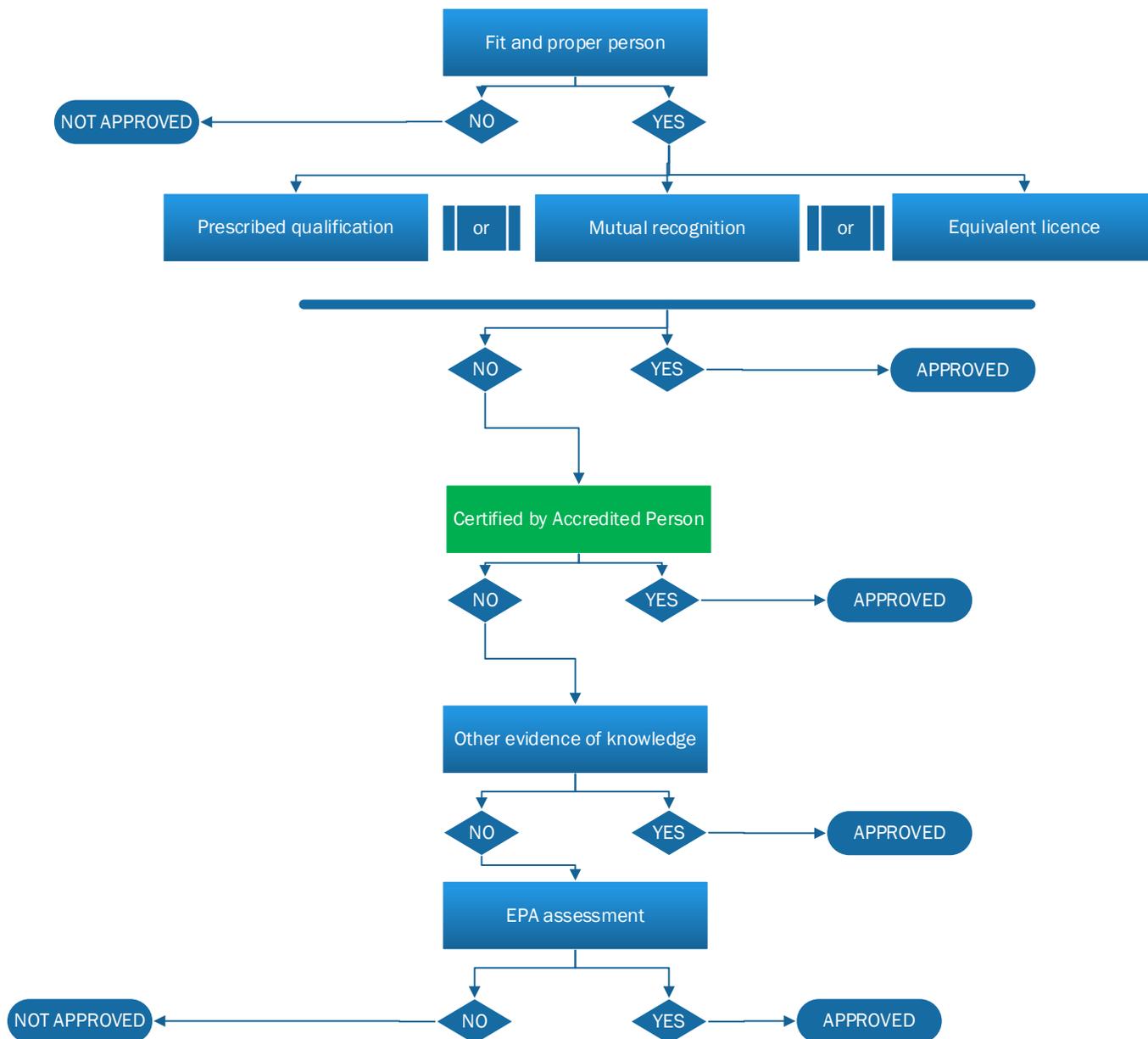


Figure 2 Role of third-party certification in the authorisation process

4.1 Application stage

Before an application is submitted, applicants may request to attend an information session where the EPA will explain the formal requirements, application process, eligibility criteria and expected timeframes. The information session will also allow for clarification of any questions on the part of candidates.

The application for an accreditation must be made in the prescribed form, and before determining an application, the Minister or his/her delegate may require the applicant to furnish further information, documents or other material, and to comply with any other requirements prescribed by regulations.

An applicant is expected to demonstrate the following broad range of professional capabilities as part of their application:

- Act in a professional manner and demonstrate a high level of independence, integrity and impartiality.
- Competently identify and apply risk assessment methods and approaches related to radiation risks to human health and the environment, consistent with best practice.
- Consistently demonstrate a deep and broad knowledge and understanding of matters related to field of radiation safety.
- Critically, logically and objectively discuss and evaluate factual and technical information related to radiation safety.
- Use their knowledge and understanding to perceptively and logically describe and explain legislation and codes/standards/guidance relevant to the field of radiation safety as well as the risks and implications for human health and the environment of non-compliance.
- Demonstrate a range of skills to coherently and effectively communicate information and demonstrate their knowledge and understanding.
- Where the applicant is also a training provider, demonstrate competence in training delivery and assessment
- Demonstrate adherence to high ethical and professional standards which may be reasonably expected of experts who are performing duties authorised by the RPC Act.

4.2 Initial screening

Applications for accreditation will be lodged online, reviewed for completeness and assigned to an authorised officer. This includes confirmation that the correct application form(s), supporting documentation and prescribed fees have been received.

4.3 EPA technical review

The authorised officer reviews the application to determine whether applicants have met the prescribed application requirements and provided satisfactory evidence of the following in their application:

- Academic qualifications
- Relevant professional experience
- Demonstrated knowledge and understanding of the legislation
- Demonstrated knowledge and understanding of the relevant codes, standards and guidelines
- Demonstrated knowledge and understanding of the field of radiation safety
- Demonstrated technical competencies
- Example of reports, assessments
- Individual registrations, memberships and certifications
- Continued professional development

The authorised officer may request further information from the applicant. Incomplete applications and delays in providing adequate information may result in candidates having to wait for the next round of applications before being considered for accreditation.

4.4 Radiation Protection Committee

One of the functions of the Radiation Protection Committee is to investigate and report upon any matters relevant to the administration of the RPC Act. For purposes of this policy, the Committee will investigate applications for accreditation and report thereon to the Minister or his delegate.

The EPA submits the results of the technical review to the Radiation Protection Committee or a subcommittee established for this purpose. The Committee assesses the application and the authorised officer's report and may interview the applicant. The purpose of the assessment and interview will be verification of an applicant's competence in the following:

- Experience, knowledge, understanding and abilities as presented in the written application
- Ability to critically and objectively examine and interpret the competence of others
- Ability to identify key risks posed to human health and the environment by radiation sources and their use/management
- Ability to logically and coherently describe, explain and communicate their knowledge and understanding of requirements related to radiation protection.

The committee may also request that the applicant sits a written exam before making a final recommendation to the Minister or his delegate for a decision.

4.5 Minister or delegate decision

The Minister or the delegate may approve or refuse the application. If approved, the decision will include the conditions of accreditation and the matters to be covered by the accreditation. It will also include the period for which the accreditation will apply, and the circumstances under which the accreditation may be suspended or cancelled.

The Minister may refuse to grant an accreditation if:

- the applicant has been found guilty of an offence against the RPC Act, or a corresponding law
- the applicant has been found guilty of an offence involving dishonesty or violence
- the applicant has been found guilty of an offence against a prescribed Act or an offence of a prescribed kind
- the applicant has held an accreditation that has been cancelled or suspended under the RPC Act, a prescribed Act or a corresponding law
- the applicant is or has been the director of a body corporate that has contravened the RPC Act, a prescribed Act or a corresponding law, or has held an accreditation that has been cancelled or suspended under the RPC Act, a prescribed Act or a corresponding law
- the applicant has failed to pass an identity check or a security background check
- other prescribed grounds exist for the refusal.

The Minister may also review and amend conditions of accreditation in accordance with the provisions of the RP Act.

4.6 Review

If refused, the decision will include the reasons for refusal and information on the process for seeking a review of the decision.

4.7 Monitoring

The EPA will institute a program to monitor compliance with the accreditation and the need to adjust the conditions of accreditation. It will also undertake a review of the effectiveness of the policy after it has been in operation for two years.

4.8 Variation of scope

Where an accredited certifier seeks to vary the activities against which they are authorised to certify, a reassessment of the certification system and processes would not be required, and a simpler process would apply that considers the suitability of the accredited certifier to certify against the new activities. This will be treated as a variation of an existing accreditation.



5 Standard requirements

Below is a selection of the key requirements of AS/NZS ISO/IEC 17024:2013 to be addressed in an application for accreditation.

5.1 General requirements

The accredited certifier shall:

- be a legal entity
- be responsible for its decisions relating to certification
- document its structures, policies and procedures
- act fair and impartially in relation to its applicants
- identify, document and eliminate or minimise any potential conflicts of interest
- have the financial resources necessary for the operation of the certification process and have adequate arrangements to cover associated liabilities.

5.2 Structural requirements

- The accredited certifier shall document its organisational structure, describing the duties, responsibilities and authorities of management, certification personnel and any committee.
- Where completion of specified training is a requirement of the certification, an accredited certifier offering training must ensure that the certification process is objective. This includes not giving the impression that the use of both services (training and assessment) would supply any advantage to the applicant, and not require the candidates complete the accredited certifier's own training as a prerequisite.

5.3 Resource requirements

- The accredited certifier shall document the duties and responsibilities of personnel involved in the assessment and certification process.
- The accredited certifier shall keep records of personnel qualifications, training, experience and professional affiliations, competence and any known conflicts of interest.
- Examiners shall have a good understanding of the certification scheme, have competence in the field to be examined, are fluent in English, and have named any known conflicts of interest.
- The accredited certifier shall use adequate premises including examination sites, equipment and resources to carry out its certification activities.

5.4 Records and information requirements

- The accredited certifier shall keep records to show that the certification process has been effectively fulfilled, particularly relating to application forms, assessment reports, training completed, and other documents relating to issuing of certificates of competency.
- The accredited certifier shall make publicly available information about the scope of the certification scheme and the prerequisites for certification.
- The accredited certifier shall develop and document policies and procedures to ensure security of assessment materials throughout the certification process and to prevent fraudulent practices.
- The accredited certifier shall make available all documents required by the EPA to verify compliance with this policy and any conditions of accreditation.

5.5 Certification requirements

A certification scheme shall include the following elements:

- Scope of certification (linked to defined authorised activity)
- Job and task description
- Required competencies
- Professional abilities
- Prerequisite qualifications
- Code of conduct
- Criteria for certification
- Assessment method and process
- Verification to ensure each assessment is fair and valid
- Provision for candidates with special needs
- Consistent examination administration
- Documented criteria for conditions for administering examinations
- Criteria for suspending and withdrawing certification
- Criteria for changing the scope or level of certification (if applicable)
- Appropriate method and procedures for verification of fairness, validity, reliability and general performance of each examination, and for correction of deficiencies
- Sufficient information gathered to determine if requirements have been met and in case of an appeal or complaint
- The certificate shall include the name of the certified person, a unique identifier, the name of the accredited certifier, a reference to the applicable certification scheme, the scope of the certification including any conditions/limitations, and effective and expiry dates.
- The accredited certifier shall have a policy and documented procedure for suspension, withdrawal, amendment and rectification of certification.
- The accredited certifier shall document the conditions for use of any certification mark or logo and enter into an agreement with certified persons about its use, including measures in the case of misuse.
- The accredited certifier shall have a documented process to receive, evaluate and make decisions on appeals and complaints, including reporting complaints to the EPA.

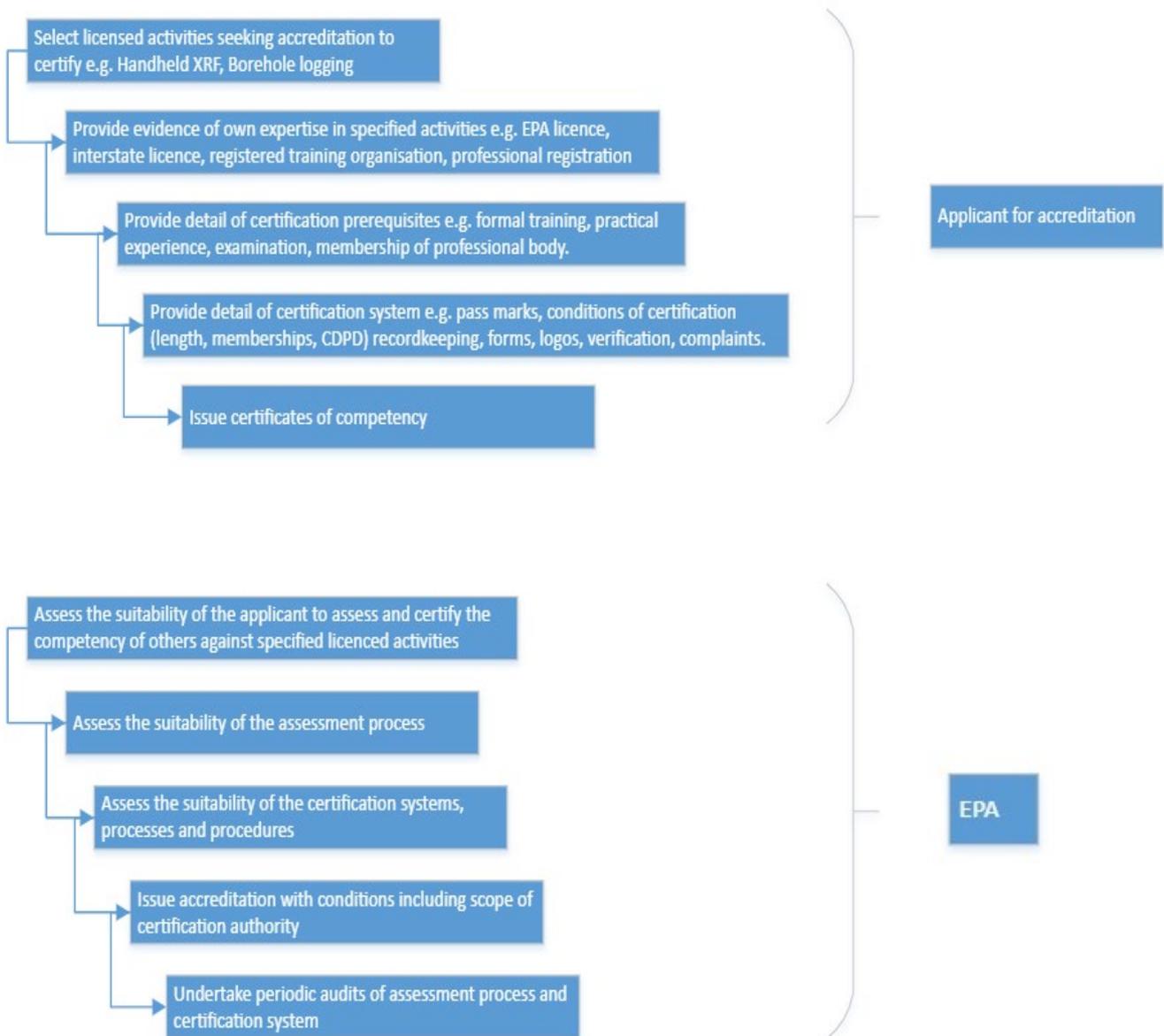
5.6 Management system requirements

- The accredited certifier will set up:
 - a management system that can support and prove consistent achievement of the requirements of this policy.
 - procedures to review its management system at planned intervals to ensure its continued suitability, adequacy and effectiveness.
 - procedures to verify that it fulfils the requirements of the policy, to show and rectify nonconformities, and to eliminate the causes of potential non-conformities.

6 Glossary

Accreditation	Formal recognition that a product or service meets specified quality assurance requirements. For the purposes of this project, accreditation refers to recognition that a person has appropriate skills, qualifications, knowledge, or experience to issue certificates of competency in relation to applicants for a licence under the <i>Radiation Protection and Control Act 1982</i> .
Qualification	Result of completing an approved program of learning that leads to formal certification which a person has achieved specified learning outcomes.
Experience	Demonstrated and verifiable application of knowledge and skills in a specified context and in terms of autonomy, responsibility, and accountability.
Certification	Verification and authentication that a person has the knowledge and skills to competently undertake specified activities
Competency	Consistent application of knowledge and skill to the standard of performance required in the workplace. It embodies the ability to transfer and apply skills and knowledge to new situations and environments.
Standard	Australia/New Zealand Standard AS/NZS ISO/IEC 17024:2013 Conformity assessment – General requirements for bodies operating certification of persons.

Checklist 1 Roles and responsibilities



Checklist 2 The process

1 The applicant to be third-party certifier

Qualifications	
Adherence to high ethical and professional standards which may be reasonably expected of experts who are performing duties authorised by the RPC Act	
Independence, integrity and impartiality	
Knowledge and understanding of the legislation, codes, standards and guidelines	
Knowledge and understanding of the relevant codes, standards and guidelines	
Knowledge and understanding of the relevant field of radiation safety	
Technical competencies	
Demonstrated abilities ¹	
Example reports, assessments	
Individual registrations, memberships, certifications	
Continued professional development	
Identity check	
Security background check	
Fit and proper person ²	

¹ Demonstrated abilities include:

- To identify key risks posed to human health and the environment by radiation sources and the requirements for their safe use.
- To critically and objectively discuss and evaluate factual and technical information related to radiation safety.
- To logically and coherently describe, explain and communicate their knowledge and understanding of the risks and requirements related to radiation safety.
- To critically and objectively examine and interpret the competence of others to safely use or handle radioactive material and radiation apparatus.

² Fit and proper person check includes:

- Found guilty of an offence against the RPC Act, or a corresponding law.
- Found guilty of an offence involving dishonesty or violence.
- Found guilty of an offence against a prescribed Act or an offence of a prescribed kind.
- Licence or an accreditation that has been cancelled or suspended under the RPC Act, a prescribed Act or a corresponding law.
- Been the director of a body corporate that has contravened the RPC Act, a prescribed Act or a corresponding law, or has held a licence or an accreditation that has been cancelled or suspended under the RPC Act, a prescribed Act or a corresponding law.
- Failed to pass an identity check or a security background check.
- Prescribed grounds exist for the refusal.

2 The assessment process

Public summary of certification process	
Defined scope of certification linked to specified EPA-licensed activities	
Defined competencies for each specified licensed activity	
Prerequisites for assessment – specified training, demonstrated experience, etc.	
Code of conduct for applicants	
Criteria for certification	
Assessment method and process	
Measures to verify fairness, validity, reliability, security, integrity and fraud protection	
Provision for candidates with special needs	
Criteria for suspending and withdrawing certification	
Template certificate – name, date, unique identifier, logo, scope, use, etc	
Appeals and complaints management process	

3 The certification system

Documented management system, policies and procedures, including policy on how impartiality will be maintained.	
Documented organisational structure, roles and responsibilities	
Financial and other resources for operation of certification process, including insurance	
Record-keeping of: <ul style="list-style-type: none"> • personnel qualifications, training, experience, professional affiliations, competence and any known conflicts of interest • application forms, assessment reports, and other documents related to certification • anything specified as condition of accreditation. 	
Premises, including training and examination sites, equipment and resources	