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A009

Control of records

Modifications: complete revision

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A. Access to records

OLAS maintains a system for identifying, assembling, indexing, accessing, classifying, storing, safeguarding and disposing of documents that allows full documentation and traceability of all accreditation files and all actions relating to its own management system.

Any handwritten addition or modification by OLAS on a record (e.g. assessor registration form, accreditation application form,...) is annotated with the date, the reason for modification and the visa of the person who made the modification.

Records are treated according to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

Given the size of OLAS all staff members have access to all records to guarantee the service continuity.

The access to OLAS offices is restricted to the staff of the administration having a entrance badge. Any person external to OLAS is accompanied while in the office. During nights the building is under the surveillance of a security service.

Every computer issued to an OLAS collaborator is fitted with an encrypted hard disk and can only be decrypted using a passphrase that is only known by the collaborator. When OLAS collaborators work from outside the office, they can only access documents stored on the central server via a VPN tunnel.

On the server and on the assessment management software, only OLAS staff has access to OLAS documents.

All file servers to which OLAS has access and uses for its daily work, are included in the general user and group policies enforced the administrator at ILNAS level. This ensures that only personnel with the correct access rights may read and write to the OLAS folders. As per general IT administration practice, administrators have access to some parts of the file servers, which they need to be able to fulfil their duties. As all personnel with such privileges are also civil servants, either from ILNAS or CTIE, OLAS does not identify any confidentiality risk regarding its administrators.

In order to educate the civil servants about IT security, the CTIE has published a Charta which everyone has to adhere to. This includes everything from the rights of the user to his duties when using material which was made available to him by the CTIE. This reduces the risk of errors and manipulations during the daily work of OLAS.

B. Storage of records

Documents related to CABs are stored in the OLAS office cabinets. As of November 2022, CAB documents are stored exclusively in electronic format.



OLAS relies on an IT infrastructure which is managed by the CTIE (“Centre de technologie et d’informations de l’Etat”) which is the central IT management department of the government of Luxembourg. Most of the software, allowed to be run by state servants and state employees, is managed centrally by the CTIE.

On the premise, ILNAS has designated a civil servant responsible for the local distribution of hardware to all ILNAS collaborators. For special software needs, the same person is responsible at ILNAS. With this arrangement, OLAS has a guaranteed supply of all hardware that it needs for its daily business (computers, monitors, peripherals, ...), as well as all needed software.

The CTIE ensures that all records which OLAS produces are stored on central servers which are backed up regularly (scheduled twice daily, weekly and monthly). OLAS has access to all these backups via usual operating system tools integrated in Windows).

The documents relating to CABs are stored for at least 10 years. The records concerning the management system documents are stored at least 5 years.

After the period of storage, documents may be destroyed by a company specialized in the destruction of documents or by using a paper shredder.

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C. Identification and classification of records

OLAS distinguishes between four categories of records:

Category 1: Records relating to the OLAS quality system

The quality manager and his deputy are in charge of updating this category of records and of the internal communication relating to them.

A. The following records are filed in jackets highlighted in **yellow**:

1. An **"OLAS Staff"** file containing

- A curriculum vitae,
- The copies of diplomas and training certificates,
- The Ethics Code document, duly signed by each person external to the Ministry of the Economy,
- The OLAS organizational chart.

A description of the position of each staff member as well as that person's responsibilities and authorizations can be found in the annexes A018 and A018bis.

2. An **"Accreditation Committee – CV and trainings of members and experts"** file containing:

- A curriculum vitae,
- The copies of diploma and trainings,
- The ethical and deontological code duly signed by each member of the Accreditation Committee.
- An annual overview of competences related to accreditation

3. An **"Accreditation Committee"** file containing:

- Agenda and minutes of approval meetings for accreditation applications signed by the president or vice-president in case of absence,
- Minutes of the academic quarter of the Accreditation Committee.

4. A **"Training"** file containing:

- Agenda of the trainings proposed by OLAS,
- Attendance sheets.

5. A **"Day of the Accreditation Community"** file containing:

- The agenda for the "Day of the Accreditation Community",
- Attendance sheets.

6. A **"Questionnaire – Assessors and experts"** file containing:

- Training questionnaires of assessors and experts,
- Personalized correction.

7. A **"Technical Committee"** file containing:



- Attendance sheets of technical committees organized,
- Validation tables of the concerned assessors and experts.

8. the **"F029"** file which contains:

- the F029 forms signed at the time of approval of the documents before their distribution.

B. The following records are saved, updates, etc. on the server in specific **"ILNAS_OLAS"** directories :

1. A **"Standards and guides"** file containing:

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- Standards and guides.
2. A "**Improvements / Defects / Derogations / Objections / Complaints**" file containing:
 - F007 – Fiche MLP
 - F008 – Derogation report
 - Correspondence received or sent relating to complaints or appeals is attached to respective forms.
 3. the "**Management Reviews**" folder which contains:
 - Preparatory documents and reports of management reviews.
 4. the "**Internal audits**" folder, which contains:
 - Internal audit reports by external auditors.

Category 2: Documents relating to the accreditation system of the Conformity Assessment Bodies (CAB)

All the electronic documents concerning the management of accreditation files are filed under the heading "**Accreditation Files**". These files are classified according to the type of accreditation: certification, inspection and laboratories. The architecture of the electronic documents stored on the network follows the following structure:

- The "**Applications**" section contains : (initial/renewal and extension assessment only)
 - The application F001A, B ou C et ses documents annexes
 - Form F001D
 - Check-list(s) F004A, F004F and/or F004G
 - A copy of the registration notification with the file number
- The "**Review of resources**" section contains:
 - The cost estimate for the assessment
 - The acceptance of the cost estimate
 - The assessors' mission order
 - The acceptance of the mission order by the assessors
- The "**Assessment**" section contains:
 - The assessment plan F003S
 - The assessment report(s) F003B, C, D, F, H, J, K, L, N and/or Q
 - The short assessment report F003P (or F003R if applicable)
 - The assessment follow-up form F003M
 - Check-list F004B, C, D or E
- The "**Decision**" section contains:
 - The opinion of the Accreditation Committee
 - The accreditation certificater
 - The notification to the CAB of the decision of the head of OLAS
 - Form F035
- The "**Evaluation of assessors**" section contains:
 - The assessment report evaluation form F009
 - The customer satisfaction form F010
 - The evaluation form(s) for the services of a quality, junior or technical assessor F011A et B
- The "**Mail**" section contains :
 - Important correspondence exchanged with representatives of an accredited organization or candidate for an accreditation and with the members of the assessment team or the initial accreditation body.
- The "**Invoices**" section contains:
 - invoices and supporting documents sent by the assessors
- The "**Inter-laboratory comparisons**" section contains:
 - Form F023 – Inter laboratory comparisons program

Within each client folder, a directory « Technical appendix » contains the technical appendix(es) of the CAB.

A folder “F021” contains forms F021A or B used for planning and monitoring the technical areas assessed over an accreditation cycle.

A folder called "Analyses and minutes of meetings and telephone calls" contains the relevant documents related to the file.

The customer database embedded in the assessment management software provides information including the exact address of the organisation, the names of executives and contact persons. Files are maintained and updated by each case manager or by the administrative agent.

The “assessment” part stored in the software allows to describe the background information of the accreditation file. Its structure is based on the procedures P001, P002 and P003 that describe respectively the management of the application, the assessment and the decision-making process. This part allows faster access to the documents issued from the accreditation process and makes the follow-up of the file easier.

For each CAB to be accredited, the assessments are numbered as follows:

- O for granting
- Px, x beginning with 1 for reassessment
- Sx, x from 1 to 4 for the four years of surveillance following granting
- Ex, x beginning with 1 for extension of scope
- Rx, x beginning with 1 for reduction in scope
- A for cancellation of accreditation
- R for withdrawal of accreditation
- S for suspension
- Cx, x beginning with 1 additional assessment

The file number is set up as follows:

N°200X/Y/ZZZ

200X = year certificate issued, Y = accreditation code / ZZZ = file number beginning with 001.

OLAS manages an annual list of new files/CABs based on the form F050 - List of files available on the server.

The certificate number is structured as follows:



N°Y/WWW

WWW = file number beginning with 001

OLAS issues a certificate by accreditation standard applied for relating to a very specific area of activity. Certificate numbers do not change when accreditation is extended.

Accreditation Code “Y”	
1	Testing laboratories and bio-medical laboratories
2	Calibration laboratories
3	Inspection organizations
4	Quality and environment system certification organizations
5	Products and services certification organizations
6	Personnel certification organizations

OLAS manages a list of all certificates based on the form F062 - List of accreditation certificates available on the server.

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For CABs the appendices to accreditation certificates are identified by a version number:

Version 0x, x beginning with 1

Numbering of appendices to a certificate resumes with 01 after certificate extensions are awarded.

The accreditation manager updates the file as the accreditation process progresses until it is completed.

Records with a handwritten signature relating to the decision (opinion of the Accreditation Committee, copy of the notification of the decision, copy of the certificate and accreditation scope) and incoming mails with a handwritten signature relating to the organisation of assessments are filed chronologically in **blue** files.

Category 3: Documents relating to assessors

The records relating to the invoicing of the audit costs and the annual fee are filed in **red files**: The invoicing manager prepares and dispatches the invoices and manages the accounts payable system in accordance with OLAS INT002 work instruction.

Category 4: Documents relating to assessors



These records are filed in hanging files and stored in the Quality Manager's office. They include the following items:

1. A copy of the confirmation of registration, renewal or withdrawal of registration sent to the assessors.
2. A request for registration in the "National Registry of Quality and Technical Assessors", forms *F002A* and/or *B*, a signed copy of the ethics code, the Curriculum Vitae,
3. Copies of diplomas of university education and eventually copies of certificates of complementary training programs,
4. If appropriate, a copy of a training certificate in the assessor's name that is recognized by OLAS,
5. A list of the realized accreditation assessments,
6. Form « F026 - Qualification des auditeurs et des experts » filled up and signed and if appropriate, recognition as a quality or technical assessor by another accreditation organization that is an EA member,
7. Correspondence
8. Obsolete documents

The assessor database is maintained and updated by the "assessors and training" manager. A window exists for each assessor containing exact address, basic qualifications, skill levels and key accreditation fields in which the assessors work. Rapid searches are done by area of accreditation and by key or skill level to ensure that OLAS can meet accreditation process goals rapidly and in due course. Assessors' information is contained in forms *F002A* and/or *B* provided by the assessors, which serve both for registering an assessor in the Registry of Assessors and for updating personal data.

Assessors are graded on a basis of 1 to 5 following each assessment completed, with quality assessors using form *F009* for the quality assessors, using form *F010* and *F011A* and *B* for the entire assessment team (quality, technical and junior). Annually and as described in procedure *P004 – Authorizing of assessors and technical experts and monitoring of their competences and performances*, the notification of the appreciations to the assessors and the experts is managed on a case by case basis in function of the results of evaluations and the number of yearly assessments realized for OLAS.

The evaluation of assessors following assessments is noted on forms *F009* for quality assessors, *F010* and *F011A*, *B* and *C* for the entire assessment team (quality, technical and junior). On an annual basis and as described in the procedure *P004 – Authorizing of assessors and technical experts and monitoring of their competences and performances*, the notification of evaluations to assessors and experts is managed on a case-by-case basis according to the results of the evaluations and the number of annual assessments performed for OLAS. The completed forms are saved on the server. The results are recorded in the OLAS software by the "assessors and training" manager.

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If applicable, at the beginning of each year, the “assessors and training” manager sends a skill assessment report to each assessor to inform him/her of the results obtained.