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# INDEPENDENT, IMPARTIALITY INTEGRITY AND CONFIDENTIALITY PROCEDURE

	Title	Signature	Date
<b>Prepared By:</b>	<b>Quality Manager</b>		01.06.2024
<b>Reviewed By:</b>	<b>Management Representative</b>		01.06.2024
<b>Approved By:</b>	<b>Managing Director</b>		01.06.2024

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### REVISION/REVIEW RECORD

Revision No.	Revision/Reviewed	Change Made by	Description of Changes	Affected Pages
00	New Establish on 10/05/2016	QM	Newly established in accordance to Quality Management System Requirements based on ISO 17020 standard.	None
00	N/A 10.06.2017	QM	Reviewed with New No Changes	None
00	N/A 10.06.2018	QM	Reviewed with New No Changes	None
00	N/A 10.08.2019	QM	Reviewed with New No Changes	None
00	N/A 10.10.2020	QM	Reviewed with New No Changes	None
00	N/A 22.08.2021	QM	Reviewed with New No Changes	None
00	N/A 20.10.2022	QM	Reviewed with New No Changes	None
01	Revised on 10.08.2023	QM	Top Management Commitment added	Page 7

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01	N/A 01.06.2024	QM	Reviewed with No Changes	None
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## 1 PURPOSE

To define the responsibilities and procedure for effective implementation and follow up of Impartiality and Independence in inspection and testing services and maintaining Confidentiality of data in accordance with International requirements

## 2 SCOPE

This document describes the criteria for the impartiality & independence of QUALITY INTERNATIONAL personnel involved in inspection and testing activities and it describes the system for ensuring the confidentiality of information exchanged between QUALITY INTERNATIONAL and its customer during the process of Inspection and testing. The scope covers Organization impartiality management threats that apply to inspection and management activities and In-Site specific impartiality management – (i.e Impartiality threats that are specific toleration between the QUALITY INTERNATIONAL and the client). Risks like financial remuneration, payment of sales commission, personnel, ownership, governance, management, contracts, marketing and other inducement for the referral of new clients have been found out and below procedure shows the ways of eliminating or minimizing the risks.

## 3 REFERENCE

BS EN ISO/IEC 17020:2012 REF – CLAUSE 4.1 & 4.2


## 4 RESPONSIBILITIES

The General Manager & Technical Manager shall be responsible for the implementation and maintenance of the system. Each personnel performing jobs shall be obliged to follow the independence & impartiality during its services and ultimately responsible for keeping the information confidential, which are not to be disclosed.

Top Management(Managing Director/General Manager) shall take strict actions against any impartiality/Confidentiality breach identified

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## 5 PROCEDURES

### IMPARTIALITY & INDEPENDENCE

- 5.1 QUALITY INTERNATIONAL identifies the risks to the impartiality on an ongoing basis. QUALITY INTERNATIONAL demonstrate, by means of procedures and enforceable agreements how it deals with the pressures and other factors that can compromise or can reasonably be expected to compromise objectivity and which may arise from a wide variety of activities, relationships, and other circumstances as well as from various personal qualities and characteristics of inspectors and employees that may be sources of bias.
- 5.2 Through the identification and analysis of conflict of interests, QUALITY INTERNATIONAL determines following relationships might pose threats to impartiality.
- Related organizations, investors, stockholders, organizations under the operations and management.
  - Inspection Bodies: other certification/Inspection Bodies other than QUALITY INTERNATIONAL.
  - Individual's: auditors, technical experts, decision makers, members of advisory boards, persons who develop new clients, other persons who might influence the inspection activities.
  - Quotations.
  - Finance, donation, loan, finance index.
  - Contracts
  - Activities, management consultancy, suspected consultancy activities, (pre audit, internal etc.).
- 5.3 Other type of threats includes
- **Self-interest threats:** Risks from a person or body acting in their own interest, for example financial self-interest source of revenue: Risks from a client paying for the Inspection /training work. This risk is significant when QUALITY INTERNATIONAL has numerous contracts with the same client.

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- **Self-review threats:** Threats that arise from reviewing the work done by themselves or by their colleagues. A self-review threat may arise when reviewing judgements and decisions they, or others in their organization, have made. (i.e. changing result of an inspection done because of opinion has been issued by any employee.)
- **Familiarity (or trust) threats:** Risk from an employee being too familiar or trusting of another person instead of seeking certification evidence is a familiarity risk. (i.e. inspection done by the same inspector to same client and same equipment
- **Intimidation threats:** Risks from a person or employee having a perception of being coerced openly or secretly, such as a risk to be replaced or reported to a supervisor or to an interested party.
- **Advocacy threats:** e.g. a body or its personnel acting in support of, or in opposition to, a given organization which is at the same time have a relation with.
- **Competition threats:** QUALITY INTERNATIONAL or any employee may be concerned about risking the inspection, training or consultancy contract.
- **Owning Up to Mistakes:** An inspector might make inadvertent errors or mistakes of judgment during inspection due to burden or due to work being monotonous or in competency.

- 5.4 The top management (Managing Director / General Manager) is committed to the development and Implementation of Impartiality & Independence and its effectiveness in achieving consistent fulfilment of ISO 17020 Standard. Top Management shall take strict action when there is a breach in the Impartiality/Confidentiality.
- 5.5 All QUALITY INTERNATIONAL Employees will be required to sign the Conflict of interest Disclosure agreement which will make provision for impartial, independence, confidentiality, objective and accountable conduct.
- 5.6 QUALITY INTERNATIONAL make sure that all its personnel know all threats that compromise impartiality.
- 5.7 QUALITY INTERNATIONAL have in place safeguards that mitigate or eliminate threats to impartiality. Safeguards may include prohibitions, restrictions, disclosures, policies, procedures, practices, standards, rules and environmental conditions. And risks to impartiality will be identified ongoing basis at least once in a year. They are regularly reviewed to ensure their continuing applicability.
- 5.8 Maintaining a culture in QUALITY INTERNATIONAL that stresses the expectation that staff will act in the wider interest and the importance of impartiality

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- 5.9 Maintaining a professional environment and culture in QUALITY INTERNATIONAL that supports behavior of all personnel that is consistent with impartiality
- 5.10 Management systems that include policies, procedures, and practices that are directly related to maintaining impartiality in personnel hiring, training, promotion, retention, and reward policies.
- 5.11 Prohibitions / Controls against certain employment relationships between the staff.
- 5.12 A disciplinary mechanism to promote compliance with policies and procedures
- 5.13 Technical manager will make unannounced visit to inspection site any time. Reports will be reviewed by the technical manager.
- 5.14 Monitoring of each employee by his manager / Senior engineer and Inspection engineers are not allowed to accept valuable gifts, money or any donation, neither attend any entertainment activities arranged by the clients.
- 5.15 QUALITY INTERNATIONAL strictly follow the pricing policies defined by the government and accreditation bodies & local Authorities.
- 5.16 The competent Inspection Engineers who perform the inspection/ testing are full time employees of QUALITY INTERNATIONAL. The remuneration is fixed for each employee against his or her labor contract.
- 5.17 The personnel performing their respective Inspection / Testing jobs shall be informed about technical scope of activity only. Under no circumstances they shall be involved in any commercial / financial matters.
- 5.18 The personnel involved in Inspection / Testing shall follow relevant standards and respective local order to perform their jobs. The personnel shall not consider the relationship based on ownership, governance, management, personnel, contracts, marketing and other inducement for the referral of new clients.
- 5.19 They shall be responsible for conducting their jobs in professional and safe manner, in order to reach a judgment, whether the equipment they have inspected/ tested are suitable for its continuing usage.
- 5.20 Under no circumstances the results of their judgment / assessment shall be influenced by any internal or external factors to the inspection body.
- 5.21 Conflict of Interest Disclosure Form (QUALITY INTERNATIONAL-QP01-F01) is followed to ensure independence, impartiality and integrity of all personnel. All personnel shall sign this form to ensure their commitment towards impartiality.

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5.22 The identified risks to Impartiality, independence & Confidentiality and their mitigation plans are explained in the Risk Assessment procedure

**CONFIDENTIALITY**

5.23 Confidentiality agreement shall be made with all the inspection and other key personnel upon their employment, prior to execution of jobs through Conflict of Interest Disclosure Form (QUALITY INTERNATIONAL-QP-001-F01).

5.24 Confidentiality agreement shall include the following clauses but shall not be limited to QUALITY INTERNATIONAL agrees not to disclose any information relating to the client’s business or affairs except information which is

- In the possession of QUALITY INTERNATIONAL certification before the date of agreement
- In the public domain
- Required to be disclosed by any competent legal authority,
- Disclosed with the client’s authority.
- if required by law or authorized by contractual commitments to release confidential which will be intimated to the clients during contract review.


5.25 The prevailing laws of UAE shall govern this agreement.

5.26 **IMPARTIALITY, INDEPENDENCE & CONFIDENTIALITY RISK ASSESSMENT**

- QUALITY INTERNATIONAL identifies the risks to the impartiality on an ongoing basis. It demonstrate, by means of procedures and enforceable agreements how it deals with the pressures and other factors that can compromise or can reasonably be expected to compromise objectivity and which may arise from a wide variety of activities, relationships, and other circumstances as well as from various personal qualities and characteristics of inspectors and employees that may be sources of bias.
- Risks are identified from the below factors such as
  - related organizations, investors, stockholders, organizations under the operations and management.
  - inspection bodies: other certification/inspection bodies other than QUALITY INTERNATIONAL.

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- individual's: auditors, technical experts, decision makers, members of advisory boards, persons who develop new clients, other persons who might influence the inspection activities.
  - quotations.
  - finance, donation, loan, finance index.
  - contracts
  - activities, management consultancy, suspected consultancy activities, (pre audit, internal etc.).
  - Self-Interest Threats
  - Self-Review Threats
  - Familiarity (or trust) threats
  - Intimidation threats
- The Risks are evaluated based on the combination of the **Consequence & Likelihood** of the happening of the risks.

RISK FACTOR (RF)					
Probability (P)	Consequence (C)				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Rare (1)	1	2	3	4	5
Possible (2)	2	4	6	8	10
Likely (3)	3	6	9	12	15
Often (4)	4	8	12	16	20
Frequent (5)	5	10	15	20	25


Low Risk	Moderate Risk	High Risk	Extreme Risk
1-3	4-6	8-12	15-25
No action required, unless escalation of risk is possible	Activity can operate subject to management and/or modification	Activity should be modified with remedial planning, action and further EHS assessment	Activity should not proceed in current form

**CRITICALITY = CONSEQUENCE RATING \* LIKELIHOOD RATING**

- Based on the Risk matrix, the Criticality of the risks are categorized as **“Low Risk (L), Moderate Risk (M), High Risk (H)”**
- The Mitigation plan / Actions for the risks taken are implemented with planned & actual implementation date.
- Final residual risk after implementation of actions shall be done to check whether the risks are as low as possible. The residual risks must be kept always as low as possible and if not, adequate actions has to be taken to reduce the risks

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**6 RELATED FORMS AND RECORDS**

Sl. No	Document Name	Document No	Retention Period
01	Employee Impartiality & Confidentiality Agreement	QUALITY INTERNATIONAL-ANNEXURE 05	3 years
02	Impartiality & Confidentiality - Risk Assessment	QUALITY INTERNATIONAL-QI-RA-II01	3 years

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