



MANAGEMENT OF IMPARTIALITY

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1. PURPOSE AND SCOPE

This document defines how QTAWA will ensure that the impartiality and objectivity of its operations are safeguarded.

The document is applicable throughout QTAWA operations and to all staff members, assessors, technical experts, related bodies and interested parties.

2. DEFINITIONS AND ABBREVIATIONS

2.1. Definitions

2.1.1. Impartiality means presence of objectivity.

2.1.2. Conflict of Interest means a situation that has the potential to undermine the impartiality of a person because of the possibility of a clash between the person's self-interest and professional interest or public interest.

2.1.3. Independence means freedom from the control, influence, support, aid, or the like, of others.

2.1.4. Interested Party is a person or organization with a direct or indirect interest in accreditation and can include conformity assessment bodies, their associations and their clients, industry services, trade associations, scheme owners, governmental regulatory bodies or other governmental services or non-governmental organizations including consumer organizations.

2.1.5. Objectivity means that conflicts of interest do not exist, or are resolved so as not to adversely influence subsequent activities of QTAWA.

2.1.6. Transparency implies openness, communication, and accountability. It means operating in such a way that it is easy for others to see what actions are performed.

2.1.7. Related Body is a separate legal entity that is linked by common ownership or contractual arrangements to QTAWA. Any structures or associations are also considered to be related bodies.

3. GENERAL

Impartiality is one of the core values of QTAWA and the cornerstone of any accreditation service. QTAWA understands the importance of impartiality in carrying out its services and manages conflict of interest and any potential conflict of interest in order to safeguard objectivity and impartiality of accreditation services rendered. QTAWA adheres with the impartiality requirements as specified in ISO/IEC 17011:2017: Conformity assessment – requirements for accreditation bodies accrediting conformity assessment bodies and OIC/SMIIC 2:2019. QTAWA has documented its impartiality policy statement to demonstrate the Top Management’s commitment for safeguarding impartiality in accreditation service delivery. The impartiality policy statement is posted on the QTAWA website www.alhalal.org

4. RESPONSIBILITY

- 4.1. All QTAWA personnel, assessors/technical experts, Board and all other Committees shall act objectively and be free from undue commercial, financial and other pressures that could compromise impartiality.
- 4.2. The Quality Management Committee is responsible for the identification through the various processes, risks to impartiality which are listed in the QTAWAQTAWA risk profiles. This is done during management reviews which are undertaken at least annually.
- 4.3. Because risk management is an essential element of good governance, the QTAWA Board of Directors which oversees the running of QTAWA and is accountable to the General Assembly, oversees the implementation of the risk management policy and reviewing the QTAWA risk profiles which contains the risk control measures and also considers any residual risks. The Board review shall be undertaken at least once a year.

5. PROCEDURES

- 5.1. Impartiality and objectivity in QTAWA’s activities are assured at the organizational and personal level.

5.2. QTAWA recognizes the possibilities for conflicts of interests arising from relationships with persons, organizations and related bodies having an interface with QTAWA. Risks arise from QTAWA activities, relations or from relations of its personnel. The sources of risks are therefore identified as follows:

- Accreditation Approvals Committee members
- Members of the Board of Directors
- All QTAWA staff involved in the accreditation process
- Other staff of QTAWA
- Assessors/Technical Experts
- Advisory Committee members

5.3. Risk assessment is an ongoing process which involves interested parties through:

- Quality Management Committee's Management review;
- Finance Risk and Audit Committee review;
- Board of Directors review; and
- Participation of interested parties in QTAWA Advisory Committees.

5.4. There are many categories of business risks and QTAWA has considered the following categories of risks and identified the threats:

5.4.1. Strategic risks

- Corporate governance – The threat arising from non-recognition and non-acceptance of HALAL has set up to meet accreditation needs of Member States with the help of national accreditation bodies.
- Reputational risk – The threat arising from losing international recognition and the risk of not being registered with local authorities as relevant, for training activities.
- Change management risk -The threat presented when QTAWA fails to achieve transitions to revised/new key accreditation standards.

5.4.2. Financial risks

- Going concern risk - The threat presented when member States do not pay their contributions towards QTAWA sustainability on time.
- Capital availability/financial sustainability – The threat arising from QTAWA not being able to fund its business.

5.4.3. Operational risks

- Risk to impartiality such as:
 - Self-interest threats: Those arising from a person or organization acting in his/her own interest to benefit oneself;
 - Subjectivity threats: Those arising when personal bias overrules objective evidence;

- Familiarity Threats: Those arising from a person being familiar with or trusting of another person, e.g. an assessor or staff member developing a relationship with an applicant / accredited organization or trainee assessor that affects the ability to reach an objective judgement);
 - Intimation threats: Those that prevent person(s) from acting objectively due to fear of a person / organization / interested party; or
 - Financial threats: Such as the source of revenue for QTAWA/its personnel/assessors.
- Failure to meet service accreditation targets – The threat presented when QTAWA fails to meet operational targets.

5.4.4. Human resources risks

- Adequate and competent staff – The threats presented due to a thin staff establishment and recruitment of incompetent staff;
- Adequate and competent Assessors – The threats arising from inadequate pool of competent assessors to meet areas of demand or anticipated demand; and
- Talent management – The threats arising from failure to identify/retain talent and lack of succession planning.

5.5. Risk Assessment Process

5.5.1. QTAWA accreditation activities should not be harmed due to the possible threats that have been identified. This can be achieved by assessing the realistic frequency of occurrences and its severity of impacts.

- a) QTAWA shall evaluate and rank the risks.
- b) QTAWA shall determine the degree of assurance of how to eliminate or minimize such threats and determine the acceptable residual risk.
- c) QTAWA shall determine whether the risk is acceptable or otherwise accreditation shall not be provided.

5.5.2. Criteria

The following criteria shall be considered:

- Frequency of occurrences (FOC)
 - Those that occur at least once a year shall be scored High with a score of 3.
 - Those that occur once every 5 years shall be scored Medium with a score of 2.
 - Those that occur once every 10 years shall be scored Low with a score of 1.

- Severity of Impact (SOI)
 - Those that result in High impact shall be scored as 3.
 - Those that result in Medium impact shall be scored as 2.
 - Those that result in Low impact shall be scored as 1.

5.5.3. Measure of risk

Calculate the measure of risk by multiplying the FOC score to the SOI score.

Measure of risk matrix

		Frequency of Occurrence (FOC)		
		3	2	1
Severity of Impact (SOI)	3	9	6	3
	2	6	4	2
	1	3	2	1

5.5.4. Risk classification

<input type="checkbox"/> Serious	Frequency of occurrence is high
	Effect is high
	Measure of risk = 6 to 9
<input type="checkbox"/> Significant	Frequency of occurrence is high/medium
	Effect is medium or frequency low but effect is high
	Measure of risk = 3 to 4
<input type="checkbox"/> Insignificant	Frequency of occurrence is low
	Effect is low
	Measure of risk = 1 to 2

5.5.5. Risk treatment

Once analysed and measured appropriate risk treatment shall be effected as described below:

- Serious : To take action to reduce risk with highest priority,
- Significant : To take action as appropriate to reduce risk, and to monitor and inform management.
- Insignificant : Acceptable no risk

6. SAFEGUARDING IMPARTIALITY

6.1. QTAWA Policies and Procedures

QTAWA shall maintain up to date policies and procedures and ensure that they support impartiality. The QTAWA Board of Directors shall ensure that QTAWA Company values are addressed in policies whilst the QTAWA, CEO shall ensure that company values are addressed in procedures and upheld in operations and service delivery.

6.2. HALAL Services

QTAWA offers accreditation services and training in accreditation associated matters.

QTAWA services are made accessible to all applicants whose request for accreditation falling within QTAWA' scope of activities, regardless of the size, geographical diversity, language diversity, number of conformity assessment bodies already accredited, or membership of any association or group. English and Indonesian languages will be preferred.

QTAWA provides external training services in accreditation associated activities. In order not to compromise its impartiality and status in training service delivery, QTAWA offers generic training courses and does not give specific advice for the development of an organization's operations. Furthermore, the training courses delivered or facilitated by QTAWA are not a precondition of accreditation neither do they guarantee accreditation by QTAWA.

6.3. Consultancy

QTAWA does not provide consultancy services to any organization that it offers accreditation. QTAWA does not offer or provide any conformity assessment services that conformity assessment bodies perform.

It is recognized that some contracted assessors consult in their private or personal capacities, however, an assessor shall not consult to an organization where he/she acted as an assessor until all nonconformities have been cleared and a decision has been made by the Accreditation Approvals Committee for unconditional accreditation to be granted or maintained, or accreditation to be withdrawn.

An assessor that has provided consultancy services to an organization shall not be used to assess or make a decision as member for that organization for a period of 2 years after their consultancy services have ceased.

The following are not considered as consultancy, as the information provided is generic and does not include specific and customized advisory activities, services and information:

- Assessor conclaves;
- Providing generic tools and guidance for applicant conformity assessment bodies;
- QTAWA training courses and workshops;
- Sharing information relating to the interpretation of accreditation standards/ guides/ requirements
- Pre-assessments aimed at gathering information, discussing documents and findings, and evaluating readiness for the initial assessment;
- Adding value during accreditation assessments, e.g. by identifying opportunities for improvement and without recommending specific solutions;
- Any other activities which are not considered as participation in an active creative manner in giving specific advice for the organization in obtaining and maintaining QTAWA accreditation.

QTAWA may provide assistance to other national, multi economy accreditation bodies, as needed, to assist them in obtaining their recognition with WAF. Such assistance is not considered as being in conflict with QTAWA services.

6.4. Governance

QTAWA is governed by a General Assembly which comprises of:

Subscribers to the Memorandum and Articles of Association;
Members of the Board of Directors;

Individuals or organizations who apply for admission as members of QTAWA.

Drawn out of the General Assembly is the Board of Directors which provides strategic direction, oversees the running of QTAWA and fulfills any function that the QTAWA General Assembly may delegate to it. The Board of Directors is responsible for the conduct of business and in their overriding duty act in the best interest of the Company and to avoid conflict of interest between themselves and the Company. All Board members share the responsibility for its decisions. The Board of Directors represent independent experts in their field of business administration and technical sciences from the private and public sectors.

The goals and nature of QTAWA operations require that the Board of Directors possess specific skills and expertise as well as attributes as outlined in QT-BP-07: Part 1 to lead and direct the Company so as to so as to effectively take decisions and monitor QTAWA performance thus ensure that QTAWA Strategic goals are achieved.

The QTAWA Board of Directors meets at least 4 times during the year and are attended by the CEO, the Finance and Administration Manager with the Technical Manager being invited as necessary. The Board oversees and regularly evaluates all aspects of QTAWA business activities to ensure its operations are carried out responsibly, openly, independently and objectively and that all

applicants for accreditation are treated alike. This guarantees that QTAWA maintains its credibility and integrity.

Upon appointment, and at every Board meeting, the Board of Directors are required to disclose any direct or indirect personal or private business interest that that member may have in any matter brought before the Board. QT-F-45

6.5. QTAWA Permanent Staff

QTAWA permanent staff are required to sign a contract with QTAWA (QT-F-50) that specifies their agreement to impartiality and non-conflict of interest. In addition, HALAL permanent staff are required to declare any potential conflict of interest be it commercial, financial, political or other pressures that could influence the accreditation process at the time that the conflict or possibility of conflict becomes evident [F-45-C].

QTAWA staff have also committed to devote his/her entire productive time, ability and attention to the business of the Organization and to perform all duties in a professional, ethical and business-like manner. They have committed not to, during the term of this Agreement, directly or indirectly engage in any other business, either as an employee or employer, consultant, principal, officer, director, advisor or in any other capacity with or without compensation, without the prior consent of the QTAWA.

QTAWA personnel are required to declare in QT-F-27 any gifts or donations received, as this can be seen as a possible bribe. The CEO shall decide on the declared gift. Any gift, donation or sponsorship where the donor expects QTAWA or an employee to alter its business in any manner shall not be accepted.

6.6. Assessors/Technical Experts

QTAWA assessors/technical experts are required to sign a contract with QTAWA (QT-F-49) that specifies their agreement to impartiality and non-conflict of interest. When selecting assessment teams, the Scheme Coordinator is responsible to ensure that each team member is free from any interest that might cause them to act in other than an impartial and non-discriminatory manner [F-45-a]. Prior to the assessment, the assessment team members are obliged to disclose any existing, former or envisaged link between themselves and the organization to be assessed. Assessment team members shall not have been engaged in such activities in the two years prior to the allocated assessment.

QTAWA requires its assessors / experts to conduct assessments in a manner that allows them to obtain and assess objective evidence fairly and remain true to a conclusion despite any pressures to change that is not based on objective evidence.

As a general principle, no gifts shall be accepted from QTAWA clients. The acceptance of dining invitations can be an area of concern. The provision of lunch by the conformity assessment body is an acceptable time and cost-effective business practice. Any dining invitation or gifts offered while participating in an assessment should be viewed as a hospitality token. However, they are

not an obligation of the accreditation assessment process. Under no circumstance should gifts and meals ever be suggested to or expected of an organization. Occasionally company souvenirs are given e.g. corporate mugs, caps, etc. and when travelling locally or out of the country evening meals may be offered. If provided and they are not excessive in value, these are acceptable. Small gifts may be given at the conclusion of an assessment as a token of appreciation for your time and effort. Often CAB staff will offer to take assessment team/members for evening meals or on local guided tours in spare time as a measure of hospitality and to allow you to experience more fully the richness of the local culture. Once again, provided these are not excessive in value they are in keeping with local business practices and thus acceptable.

It is up to individuals to make appropriate judgement when accepting or declining any gifts or dining invitations. Common sense and awareness of usual business practice within the culture is the best guide. If an assessment team member is in any way uncomfortable, they shall discuss it with the QTAWA Technical Manager/Scheme Coordinator or gracefully decline. Any monetary gifts may not be accepted. The receipt of all gifts must be disclosed to QTAWA.

6.7. Committee Members

QTAWA Advisory Committees advise QTAWA on technical matters within a specific field of expertise. The credibility of QTAWA accreditation processes hinges on the technical knowledge of the Advisory Committees. Advisory Committees only advise and make recommendations. All decision-making lies solely with QTAWA. (QT-AP-11).

The Advisory Committee composition and membership is the responsibility of QTAWA who ensures that not only appropriate technical expertise is available but also an appropriate balance of interests is maintained, as far as possible, for each of its Advisory Committees and that there is no conflict of interests and that their recommendations are not self-serving.

Upon appointment, members sign a nondisclosure and confidentiality form. Although information discussed at Advisory Committees would normally be already in the public domain, at every meeting, members are required to disclose any direct or indirect personal or private business interest that that member may have in any matter brought before the Advisory Committee QT-F-45-d.

QTAWA does not remunerate members for attendance to meetings, participation in working groups or the generation of Technical Documents. QTAWA may, from time to time, reimburse members for incidental costs such as travel costs, accommodation and subsistence allowance. Such incidental expenses must be approved by the CEO.

6.8. Decision-making

At the organizational level, impartiality and objectivity in decision-making are safeguarded through the induction training, approval and monitoring the performance of the Accreditation Approvals Committee (AAC) in line with QT-AP-14. The AAC members are approved by the CEO on the basis of their induction training in decision making procedures, and the demonstration

of their ability to remain objective in the decision- making process. The performance of AAC members is monitored at least once in every 3 years.

Accreditation Approvals Committee (AAC) members shall not evaluate an assessment pack of which the member was part of the assessment team or where he/she may have any other conflict of interest with the matter under review. Such declaration shall be made on F-75/F-77.

6.9. Related Bodies

QTAWA maintains a list of related bodies whose relations are analyzed and reviewed annually by the Quality Management Committee, Finance Risk and Audit Committee and then the Board of Directors to determine the potential for conflict of interest. (QT-BP-09).

7. MONITORING ACTIVITIES

QTAWA identifies, analyses, evaluates, threats and monitors potential risks to impartiality on an ongoing basis through:

- Internal audits;
- Management reviews;
- External financial audits;
- Customer satisfaction surveys; and
- QTAWA also operates an impartial complaints and appeals procedure which is open to all stakeholders.

7.1. Internal Audits are arranged at least annually to confirm continued compliance to all the requirements of the QTAWA Quality Management System, ISO/IEC 17011 and the mandatory requirements of ILAC/WAF /OIC/SMIIC, and to ensure an effective and efficient implementation of our policies and procedures;

7.2. External Auditors provide an independent, objective and reasonable assurance on whether the financial statements comply with relevant accounting standards and present fairly the financial position and performance of QTAWA. The directors are responsible for preparation of the financial statements in accordance with the International Financial Reporting Standards (IFRS).

The annual evaluation of the internal control measures and risk profile.

7.3. Customer surveys with QTAWA's clients conducted on an ongoing basis at service provision. (F-51 and F-99).

7.4. Impartial complaints and appeals procedure (QT-AP-08 and BP-05). For the complaints system independent and competent investigators are appointed to investigate vaulted complaints. Appeals against QTAWA decisions are submitted investigated by an Appeals Committee set up by the QTAWA Board of Directors.

8. RECORDS

QTAWA keeps records of its risk assessments. (BP -09 and BP-06).

9. REFERENCES

<input type="checkbox"/> PM-01	:	QTAWA Policy Manual
<input type="checkbox"/> AP-08	:	Customer Feedback Handling Procedure
<input type="checkbox"/> AP-11	:	Terms of Reference, Registration and Responsibilities of Advisory Committees
<input type="checkbox"/> AP-14	:	Accreditation Decision Making Process
<input type="checkbox"/> BP-05	:	Terms of Reference Appeals Committee
<input type="checkbox"/> BP-06	:	QTAWA Risk Profile
<input type="checkbox"/> BP-07: Part 1	:	QTAWA Board of Directors Skills and Expertise Requirements
<input type="checkbox"/> BP 09	:	QTAWA Related Bodies Risk Profile
<input type="checkbox"/> ISO/IEC 17011: 2017	:	Conformity Assessment – Requirements for Accreditation bodies accrediting conformity assessment bodies
<input type="checkbox"/> F-27	:	Gift Register
<input type="checkbox"/> F-45-a	:	Nondisclosure/Confidentiality Statement – Assessors / Technical Experts
<input type="checkbox"/> F-45-c	:	Nondisclosure/Confidentiality Statement – QTAWA Staff members
<input type="checkbox"/> F-45-d	:	Nondisclosure/Confidentiality Statement – QTAWA Board/ Committee members
<input type="checkbox"/> F-49	:	Independent Contractor Agreement Between QTAWA and Assessor / Technical expert
<input type="checkbox"/> F-50	:	Employment Contract
<input type="checkbox"/> F-51	:	Training Services Evaluation Form
<input type="checkbox"/> F-75	:	Accreditation Approvals Committee Evaluation of Assessment Packs - Initial Assessments, Reassessments and Extensions to New Scopes
<input type="checkbox"/> F-77	:	AAC Member’s Review of Assessment Packs – Periodic On- site Assessments, Extension and Reduction of Existing Scopes and Additional Signatories to Existing Accredited Facilities
<input type="checkbox"/> F-99	:	Customer Satisfaction Survey – Accreditation Services



APPENDIX – AMENDMENT RECORD

Revision Status	Change			Approved by	2020-04-25
	Page	Clause/ Subclause	Description of Change		
Issue 1	-	-	-	QTAWA Board of Directors	2020-04-25