



NAJMA CONSULTANCY

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PROCEDURE FOR IMPARTIALITY & CONFIDENTIALITY

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SIGNATORIES	NAME	DESIGNATION	DATE	SIGNATURE
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Approved By	Rohitashwa Mishra	CEO	01-Sep-2021	

النجمة لاستشارات القوى البشرية
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Revision History:

REV.	DATE	NAME OF CHANGES	APPROVED BY
00	01-Sep-2021	Initial Issue	CEO



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1 PURPOSE

- 1.1 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.
- 1.2 While the organizational structure of Najma Human Resources Consultancy (NHRC) assures independence of inspection decision making, the procedures of Najma Human Resources Consultancy (NHRC) seek to confirm how the primary requirements of impartiality are fulfilled.
- 1.3 To give confidence to all parties involved that impartiality can be achieved whilst carrying out inspections & tests.
- 1.4 This procedure considers the possible threats and safeguards against those threats to independence and impartiality of decision making within Najma Human Resources Consultancy (NHRC).

2 SCOPE

- 2.1 This document describes the criteria for the Impartiality & Independence of Najma Human Resources Consultancy (NHRC) personnel involved in inspection and testing activities and it describes the system for ensuring the confidentiality of information exchanged between Najma Human Resources Consultancy (NHRC) 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 Najma Human Resources Consultancy (NHRC) 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

- 3.1 BS EN ISO/IEC 17020:2012 Ref – Clause 4.1 & 4.2

4 RESPONSIBILITIES

- 4.1 The CEO, Technical Manager and Management Representative 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.

5 PROCEDURES

5.1 IMPARTIALITY & INDEPENDENCE

- 5.1.1 Najma Human Resources Consultancy (NHRC) identifies the risks to the impartiality on an ongoing basis. Najma Human Resources Consultancy (NHRC) 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.
- 5.1.2 Through the identification and analysis of conflict of interests, Najma Human Resources Consultancy (NHRC) 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 Najma Human Resources Consultancy (NHRC).
 - Individual's: auditors, technical experts, decision makers, members of advisory boards, persons who develop new clients, other persons who might influence the inspection activities.

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- Quotations.
- Finance, donation, loan, finance index.
- Contracts
- Activities, management consultancy, suspected consultancy activities, (pre audit, internal etc.)

5.1.3 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 Najma Human Resources Consultancy (NHRC) has numerous contracts with the same client.
- **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:**
Najma Human Resources Consultancy (NHRC) 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.

5.1.4 The top management (CEO / Managing Director) is committed to the development and Implementation of Impartiality & Independence and its effectiveness in achieving consistent fulfillment of ISO 17020 Standard. Top Management shall take strict action when there is a breach in the Impartiality/Confidentiality.

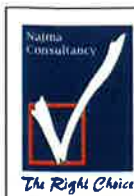
5.1.5 NHRC ensures that its inspection activities are free from any commercial, financial and any other pressures that might affect their inspection judgment.

5.1.6 All Najma Human Resources Consultancy (NHRC) Employees will be required to sign the Conflict of Interest Disclosure Agreement which will make provision for impartial, independence, confidentiality, objective and accountable conduct.

5.1.7 Najma Human Resources Consultancy (NHRC) makes sure that all its personnel know all threats that compromise impartiality.

5.1.8 Najma Human Resources Consultancy (NHRC) 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.

5.1.9 Maintaining a culture in Najma Human Resources Consultancy (NHRC) that stresses the expectation that staff will act in the wider interest and the importance of impartiality



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- 5.1.10 Maintaining a professional environment and culture in Najma Human Resources Consultancy (NHRC) that supports behavior of all personnel that is consistent with impartiality
- 5.1.11 Management systems that include policies, procedures, and practices that are directly related to maintaining impartiality in personnel hiring, training, promotion, retention, and reward policies.
- 5.1.12 Prohibitions / Controls against certain employment relationships between the staff.
- 5.1.13 A disciplinary mechanism to promote compliance with policies and procedures
- 5.1.14 Technical Manager will make unannounced visit to inspection site any time. Reports will be reviewed by the technical manager.
- 5.1.15 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.
- 5.1.16 Najma Human Resources Consultancy (NHRC) strictly follow the pricing policies defined by the government and accreditation bodies & local Authorities.
- 5.1.17 The competent Inspection Engineers who perform the inspection/ testing are full time employees of Najma Human Resources Consultancy (NHRC). The remuneration is fixed for each employee against his or her labor contract.
- 5.1.18 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.
- 5.1.19 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.
- 5.1.20 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.
- 5.1.21 Under no circumstances the results of their judgment / assessment shall be influenced by any internal or external factors to the inspection body.
- 5.1.22 Conflict of Interest Disclosure Form (NHRC-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.
- 5.1.23 The identified risks to Impartiality, independence & Confidentiality and their mitigation plans are explained in the Risk Assessment procedure

5.2 CONFIDENTIALITY

- 5.2.1 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 (NHRC-QP01-F01).
- 5.2.2 Confidentiality agreement shall include the following clauses but shall not be limited to Najma Human Resources Consultancy (NHRC) agrees not to disclose any information relating to the client's business or affairs except information which are; and stated in the contractual agreement.
- In the possession of Najma Human Resources Consultancy (NHRC) certification before the date of agreement
 - In the public domain
 - Required to be disclosed by any competent legal authority,

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- 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.

5.2.3 The prevailing laws of UAE shall govern this agreement

5.3 IMPARTIALITY, INDEPENDENCE & CONFIDENTIALITY RISK ASSESSMENT

5.3.1 Najma Human Resources Consultancy (NHRC) 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.

5.3.2 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 Najma Human Resources Consultancy (NHRC).
- Individual's: auditors, technical experts, decision makers, members of advisory boards, persons who develop new clients, other persons who might influence the inspection activities.
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- Self-Interest Threats
- Self-Review Threats
- Familiarity (or trust) threats
- Intimidation threats



5.3.3 The Risks are evaluated based on the combination of the Consequence & Likelihood of the happening of the risks.

CRITICALITY = CONSEQUENCE RATING * LIKELIHOOD RATING

RISK MATRIX							
LIKELIHOOD/IMPACT			Impact Consequences				
			Negligible	Minor	Moderate	Significant	Critical
			1	2	3	4	5
Likelihood	Extremely Likely	5	5	10	15	20	25
	Highly likely	4	4	8	12	16	20
	Very Likely	3	3	6	9	12	15
	Likely	2	2	4	6	8	10
	Unlikely	1	1	2	3	4	5

5.3.4 Based on the Risk matrix, the Criticality of the risks are categorized as "Low Risk (L), Moderate Risk (M), High Risk (H)"

CRITICALITY	16-25	High Risk (H)	Unacceptably high Activity or procedure should be modified to including remedial planning and action be subject to detailed HSE assessment
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	6-15	Moderate Risk (M)	Acceptable, but must be managed at "As Low as Reasonably Practicable" (ALARP) Activity or procedure can operate subject to management and / or modification
	1-5	Low Risk (L)	Acceptable without further action No action required unless escalation of risk is possible

- 5.3.5 The Mitigation plan / Actions for the risks taken are implemented with planned & actual implementation date.
- 5.3.6 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

6 RELATED FORMS AND RECORDS

Sl. No	Document Name	Document No	Retention Period
01	Employee Impartiality & Confidentiality Agreement	NHRC-QP01-F01	3 years
02	Impartiality & Confidentiality - Risk Assessment	NHRC-QP01-F02	3 years

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