	National Test House (NR) Ghaziabad Procedure for safeguarding impartiality	Document no.	NTH(NR)/UAS/CB/SOP/09
		Issue no.	1
		Date	02.06.2023
		Amend. No.	01
		Amend. date	28.07.2023
		Prepared by	QM, NTH(NR)
		Approved by	SIC, NTH(NR)

Procedure for safeguarding impartiality

IMPARTIALITY POLICY:

Top Management of NTH (NR) understands the importance of impartiality in carrying out its Product certification activities, manages conflict of interest and ensures the objectivity of the certification activities.

Product Certification Division personnel are prohibited from participating in the Audit of any organization to which they have given assistance, by testing of products, consultancy or training (other than professionally registered auditor training), or where they have any financial or commercial interest for a minimum period of 2 years prior to the date of application of the organization for certification.

When assigned to a particular contract, NTH (NR) audit officers shall not disclose or discuss any detail; before or after the Audit; to any member other than their direct Management or other members of the team.


All internal & external personnel working for Product certification shall sign PCD Personnel agreement and Confidentiality agreement.

NTH (NR) officers, Auditors (external/Internal), Experts are prohibited from engaging in consultancy activities or any other form which may harm impartiality issue.

THREATS AGAINST IMPARTIALITY:

In accordance with its policy on safeguarding impartiality, the NTH (NR) has established the following procedure for analyzing threats against impartiality of the NTH (NR). The analysis shall cover all existing potential sources of conflict of interests, arising NTH (NR)'s activities (its own activities, activities of the related bodies and activities of personnel it employs) and from its relationships (organizational as well as individual's).

1. A conflict of interest analysis is carried out at least once annually and whenever a significant change occurs in the NTH (NR)'s activities, such as changes in the organizational structure and business activities or of the legal status and mergers with, or acquisitions of other organizations.


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2. A relationship that threatens the impartiality of the NTH (NR) can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients, etc.

3. While carrying out the conflict of interest analysis the following risks, but not limited to them, shall be considered:
 - a. Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
 - b. Self-review threats: threats that arise from a person or body reviewing the work done by themselves. The certification of a client, whose product was designed or who was provided service regarding internal evaluation by the NTH (NR) or the personnel it employs would be a self-review threat.
 - c. Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evaluation evidence. Repeat evaluation of a client by the same evaluator/auditor, over and over again may also present a familiarity threat.
 - d. Intimidation threats: threats that arise from a person or body having a perception of being coerced openly or secretly, such a threat to be replaced or reported to a supervisor.

4. When a relationship poses an unacceptable threat to impartiality then certification shall not be provided. Some of these situations requiring prohibitions as mitigation measures have been described vide clause 4.2.6 of ISO 17065:2012. These shall be implemented together with the additional ones provided in this document.

5. Further, where risks to impartiality have been identified as a result of the above mentioned risk analysis, the NTH (NR) shall :
 - a. Not provide certification, since the situation poses unacceptable threat to


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impartiality – prohibition;

- b. Carry out the certification in a restricted manner based on disclosures;
 - c. Minimize the risks on the basis of clearly defined control points to ensure mitigation. The impartiality risk analysis together with mitigation strategies should be documented.
6. In addition to those prescribed in clause 4.2.6 of ISO 17065 the other type of product related consultancy services that shall be considered are barriers to certification would be participation in an active creative manner in the ongoing development and monitoring/improvement of the product, process, or service, for example;
- i. providing specific support/advise on elements of the design. The manufacturer should have a design process that takes into account the following:
 - a. Customers’ requirement
 - b. All applicable regulatory requirements
 - c. Functional /performance requirements
 - d. Electrical safety requirements
 - e. Applicable EMC requirements
 - f. Hazardous chemicals requirements
 - g. Software validation requirements
 - h. Packaging requirements
 - ii. preparing or producing manual, handbooks or procedures;
 - iii. involvement in the supplier’s monitoring, review and decision-making process applicable to the product;

MECHANISM FOR SAFEGUARDING IMPARTIALITY:

NTH (NR) has formed a committee consisting of one representative from Drone Federation of India as Chairman of the committee, Head of Product Certification Division of NTH (NR) and

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one representative from any UAS manufacturers as members for safeguarding its impartiality. The mechanism provides input on the following:

- a) the policies and principles relating to the impartiality of its certification activities;
- b) any tendency on the part of a NTH (NR) to allow commercial or other considerations to prevent the consistent impartial provision of certification activities;
- c) matters affecting impartiality and confidence in certification, including openness.

Head of the Product Certification division shall inform the findings of the impartiality committee to the Director/Scientist I/c of NTH (NR). If the top management of the NTH (NR) does not follow the input of the impartiality mechanism, the mechanism shall have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking appropriate action, the confidentiality requirements relating to the client and NTH (NR) shall be respected. The Head of PC division is responsible for implementing the outcome of the impartiality committee accepted by the top management of NTH (NR) in certification process for UAS.

Advice/input of the above mechanism that is in conflict with the operating procedures of the certification body or other mandatory requirements should not be followed. The reason behind the decision to not follow input shall be documented and maintained for review by appropriate personnel.