

# EDS / Management Of Impartiality

Version No.01

Version Date: March 27, 2026

## 1. Purpose

- 1.1. This document describes the management of impartiality for certification.
- 1.2. The purpose of this procedure is to acknowledge that impartiality is important to the clients and other stakeholders and to conform to the requirements of CSUAS. This procedure provides the necessary steps for identifying, assessing, and minimizing risks to impartiality.

## 2. Scope

- 2.1. This document covers requirements for management of impartiality during certification process.

## 3. Responsibility

- 3.1. **Top Management** is responsible for providing the resources and training to implement this procedure. To provide model as an example of impartiality and communicate its importance to Auditors and company employees as well as empaneled as an ongoing basis.
- 3.2. **Decision maker** is responsible for maintaining this procedure and ensures that it is appropriately followed. ARAI Manager maintains record, as evidence that this procedure is being followed in day to day work.
- 3.3. **Auditors and company employees as well as empaneled** are responsible to follow this procedure and request for assistance if needed to maintain impartiality.

## 4. Procedure

### 4.1. Mechanism to safeguard impartiality

- 4.1.1. Decision maker will ensure impartiality by:
  - 4.1.1.1. Conducting checks on risks to the impartiality;
  - 4.1.1.2. Completing annual impartiality assurance reviews;
  - 4.1.1.3. Responding to claims of conflicts of interest;
  - 4.1.1.4. Implementing recommended actions to ensure ongoing impartiality.

### 4.2. Periodic impartiality assurance meeting

- 4.2.1. **Annual** meeting of impartiality committee is conducted to assure ongoing impartiality.
- 4.2.2. During the meeting the following issues affect the impartiality of the management system certification activities are discussed;
  - 4.2.2.1. Commercial, financial or other pressures to Auditors and company employees as well as empanelled,
  - 4.2.2.2. Over pressure related to audit carried–out by Auditors and company employees as well as empanelled,
  - 4.2.2.3. Relationship with the client, suppliers, employees etc.
  - 4.2.2.4. Shared resources
  - 4.2.2.5. Finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients.

### 4.3. Identification of threats to the impartiality

- 4.3.1. Threats are identified during the discussion during the management system certification activities.

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- 4.3.2. Following threats are identified and concluded at the end of meeting;
- 4.3.2.1. **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.
- 4.3.2.2. **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 ARAI or the personnel it employs would be a self-review threat.
- 4.3.2.3. **Familiarity threats:** Threats that arise from a person being familiar with or trusting of another person, e.g. top management or Auditors and company employees as well as empaneled developing a relationship with a client that affects the ability to reach an objective judgment;
- 4.3.2.4. **Intimidation threats:** Threats that prevent an organization or its Auditors and company employees as well as empaneled from acting objectively due to fear of a client or other interested stakeholder;
- 4.3.2.5. **Financial threats:** The source of revenue for an organization can be a threat to impartiality.
- 4.3.3. These threats to identified, documented, analyzed and mitigated in risk analysis document.

## **4.4. Corrective action**

- 4.4.1. Corrective action will be implemented as quickly as possible by assigned qualified Auditors and company employees as well as empaneled or external person(s), as deemed appropriate by the management. Corrective actions shall be recorded using the corrective action procedure and recorded using the corrective action report.
- 4.4.2. It is ensured that the corrective action is sufficient to eliminate the threat and recurrence of similar types of threats
- 4.4.3. If it is identified to provide additional training as a part of corrective action, training is planned as per the procedure for training and is provided. Records of training provided and its evaluation are maintained.
- 4.4.4. Modification in the audit report or modification of an interpretation of audit and/or assessment report, identified as a part of corrective action, will be done and implemented immediately, and the concerned stakeholders will be informed accordingly.
- 4.5. Annual confidentiality and impartiality declarations are done and recorded once we have clients, or they will be done as necessary if a need arises.
- 4.6. The ARAI personnel involved in the certification process to sign declaration (Annexure A) by which they commit themselves to declare any prior and/or present association on their own part, or on the part of their employer.

## **5. Responsibilities of ARAI for ensuring impartiality**

- 5.1. The top management's commitment to impartiality shall be demonstrated through:
  - 5.1.1. Documenting the ARAI's policy on safeguarding impartiality and ensuring that it is understood at all levels of the organization. Implementing good practices like establishing "Code of Conduct" and requiring internal and external personnel to abide by it.
  - 5.1.2. Having a defined institutional structure and impartiality policy and procedures, appropriate implementation of these policy and procedures and operation and conduct of its activities and personnel.
  - 5.1.3. Having a system that ensures appropriate management of conflict of interest for ensuring objectivity of its certification functions.
  - 5.1.4. Taking action to respond to any threats to its impartiality arising from the actions of other parts of the organization, persons outside of the organization, subcontractors, related bodies or other bodies or organizations.
  - 5.1.5. Maintaining a professional environment and culture in the organization that supports a behavior of all personnel that is consistent with impartiality.
  - 5.1.6. Making available to the public through its website, its policy on impartiality.

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- 5.2. The ARAI shall establish and implement a documented procedure for analyzing threats against impartiality of the ARAI. The analysis shall cover all existing potential sources of conflict of interests, arising ARAI'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). The ARAI shall ensure that a conflict of interest analysis is carried out at least once annually and whenever a significant change occurs in the ARAI'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.
- Note 1: A relationship that threatens the impartiality of the ARAI 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.
- Note 2: While carrying out the conflict of interest analysis the following risks, but not limited to them, shall be considered:
- 5.2.1. 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.
- 5.2.2. 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 ARAI or the personnel it employs would be a self-review threat.
- 5.2.3. 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.
- 5.2.4. 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.
- 5.3. 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.
- 5.4. Further, where risks to impartiality have been identified as a result of risk analysis (clause 3.3), ARAI shall establish and implement a documented procedure for mitigation of threats against impartiality. These shall be through any of the following mitigation means:
- 5.4.1. Not provide certification, since the situation poses unacceptable threat to impartiality – prohibition;
- 5.4.2. Carry out the certification in a restricted manner based on disclosures;
- 5.4.3. 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.
- 5.4.4. The ARAI shall require personnel involved in the certification process to sign a contract or other document by which they commit themselves to declare any prior and/or present association on their own part, or on the part of their employer.
- 5.4.5. The ARAI and any part of the same legal entity and entities under its organizational control shall not: i. be the designer, manufacturer, installer, distributor or maintainer of the certified product/process/services; ii. offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.
- 5.5. 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;
- 5.5.1. providing specific support/advise on elements of the design. The manufacturer should have a design process that takes into account the following:
- 5.5.1.1. Customers' requirement
- 5.5.1.2. All applicable regulatory requirements
- 5.5.1.3. Functional /performance requirements
- 5.5.1.4. Electrical safety requirements

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- 5.5.1.5. Applicable EMC requirements
- 5.5.1.6. Hazardous chemicals requirements
- 5.5.1.7. Software validation requirements
- 5.5.1.8. Packaging requirements
  
- 5.5.2. Preparing or producing manual, handbooks or procedures;
- 5.5.3. Involvement in the supplier's monitoring, review and decision-making process applicable to the product;
  
- 5.6. In addition to the requirement specified in ISO 17065 clause 4.2.6, the following shall also apply:
  - 5.6.1. The ARAI shall not have any relationship with the client except third party conformity assessment. There shall be a minimum separation of 2 years before application can be entertained, in case the ARAI has had relationship which is generic (not UAS Certification Scheme) in nature, for example, internal audit training, etc. then the ARAI shall carry out impartiality risk analysis before entertaining the application. The purpose of risk analysis shall be to ascertain if, longer separation than two years is required from the last date of end of relationship as stated above or that the risk is of such unacceptable level so as to prohibit certification by the ARAI. Based on the risk analysis appropriate decisions shall be taken and the justification for the same shall be recorded.
  - 5.6.2. In case the related body is engaged in any of the activities as specified in clause 4.2.6 of ISO 17065:2012 or activities like management system consultancy, internal auditing or training, then certification shall not be provided to the relevant client to whom these services may have been provided by the related body. There shall be a minimum separation of 2 years, in case the related body has had a relationship which is generic (not UAS Certification Scheme) in nature, for example, internal audit training, etc. then the ARAI shall carry out impartiality risk analysis before entertaining the application. Purpose of risk analysis shall be to ascertain if, longer separation than two years is required from the last date of end of relationship as stated above or that the risk is of such unacceptable level so as to prohibit certification by the ARAI. Based on the risk analysis appropriate decisions shall be taken and the justification for the same shall be recorded.
  - 5.6.3. If the ARAI and its client are both part of the government, the two bodies shall not directly report to a person or group having operational responsibility for both. The ARAI shall, in view of the impartiality requirement, be able to demonstrate how it deals with a case where both itself and its client are part of the government. The ARAI shall demonstrate that the applicant receives no advantage and that impartiality is assured.
  - 5.6.4. The ARAI shall not certify a product on which a client has received consultancy or internal evaluations, where the relationship between the consultancy organization and the ARAI poses an unacceptable threat to the impartiality of the ARAI. Allowing a minimum period of two years to elapse following the end of the product consultancy is one way of reducing the threat to impartiality to an acceptable level.
  - 5.6.5. The ARAI shall not outsource/subcontract any part of the certification work, evaluation, etc. to a legal entity that is engaged in designing, manufacture, installation, distribution or maintenance of the certified/to be certified, product, process and service. It shall also not be outsourced to organizations who are likely to provide consultancy / internal auditing services to clients /prospective clients of the ARAI.
  - 5.6.6. The ARAI shall not use external assessors /auditors for the purpose of assessment of any client, if they, or the organization that employs them, have been engaged in any other activities as stated above.
  - 5.6.7. The ARAI shall not use personnel who have been involved in, or have had relationships with the product certification client in any way within the last two years as a minimum, to take part in assessment /auditing. The period of separation shall be determined by the nature of association. In case the individual concerned has worked for the organization concerned or provided any manufacturing unit related consultancy on product then the ARAI shall not use such person at all.
  
- 5.7. The ARAI's activities shall not be marketed or offered as linked with the activities of an organization that provides product, manufacturing related consultancy. The ARAI shall take action to correct inappropriate claims by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if the ARAI were used. A ARAI shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.
  
- 5.8. The ARAI's personnel involved in certification activities shall be bound by the ARAI's impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions

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for each evaluation activity.

- 5.9. The ARAI shall also have a system for self-disclosure and documentation of the types of activities carried out by its internal and external personnel and subcontractors and the organizations that employ them, in general and in particular regarding the designing of relevant product/ process /service, consultation, internal assessment/auditing, training, etc. (to be included in application detail form)
- 5.10. The ARAI shall also take an undertaking with respect to freedom from conflict of interest for every evaluation assignment allotted to the individuals. Based on the revelations made, if any, the ARAI shall use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and shall not use such personnel, internal or external, unless any potential conflict of interests has been addressed and the measures taken to address these potential conflicts have been documented and implemented.
- 5.11. The ARAI shall require its personnel, internal and external, to report any situation of influence or pressure from the client that may threaten their independence in the course of certification activities. Based on such a report, the ARAI shall take appropriate actions to ensure its independence in its certification work.
- 5.12. The ARAI's personnel involved in certification activities shall not provide, while carrying out Assessment /audit, any advice, consultancy or recommendation to the client on how to address any deficiencies that may be identified during the assessment/audit.
- 5.13. The ARAI should be responsible for ensuring that neither related bodies, nor sub-contractors, nor external assessors/auditors operate in breach of the undertakings that they have given. It should also be responsible for implementing appropriate corrective action in the event that such a breach is identified

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## Annexure A

### DECLARATION FORM FOR IMPARTIALITY

I hereby declare that, I shall not:

- I. be the designer, manufacturer, installer, distributor, or maintainer of the certified product;
- II. offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.
- III. engage in any activities that may conflict with impartiality

I declare that I do/don't have any prior and/or present association with \_\_\_\_\_ . In case there is any association with client mention below:

- 1.
- 2.
- 3.
- 4.

Name of the employee:

P. No.:

Signature:

Date: