



MP 17 - 02

NiNAS RISK PROCEDURE

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Date of Approval	01/04/2023
Date of Implementation	01/04/2023



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1. Purpose/Scope

This procedure describes the measures taken by NiNAS to identify risks to impartiality arising from accreditation activities and the process of dealing with such risks. The procedure will also assist NiNAS in determining potential risks associated with the activities of conformity assessment bodies. This procedure was developed to fulfill the requirements of clause 4.4.2 and clause 7.4.6 of ISO/IEC 17011:2017.

The risk identification, evaluation and treatment will be considered in two parts namely:

- i. Risks arising from the activities of NiNAS; and
- ii. Risks arising from the activities of conformity assessment bodies.

2. References/Definitions

- i. ISO/IEC 17011:2017 (Conformity assessment - General requirements for accreditation bodies accrediting conformity assessment bodies)
- ii. IAF/ILAC-A5 - IAF/ILAC Multi-Lateral Mutual Recognition Arrangements: Application of ISO/IEC 17011:2004-4.3 Impartiality
- iii. NiNAS Code of Conduct for Personnel
 - iii. NiNAS Impartiality Policy
 - iv. EA-2/19 INF List of risks for accreditation processes and operation of national accreditation bodies

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.

Impartiality: presence of objectivity, i.e. to be fair and unbiased, making decisions based on objective criteria.

Note 1: objectivity is understood to mean conflicts of interest do not exist or are resolved so as not to adversely influence the activities of the body.



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

Objectivity: means being true even outside of one’s biases, interpretations, feelings, and imaginings by relying on verifiable data.

Transparency: implies openness, communication, and accountability.

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All definitions are taken from the ISO/IEC 17000

3. General

3.1 NiNAS Impartiality Policy (PL 002-02)

The management of NiNAS is responsible for the impartiality of its accreditation activities through the implementation of policies and procedures in fulfillment of clause 4.4.2 of ISO/IEC 17011:2017. The Director General/Chief Executive Officer (DG/CEO) of NiNAS is solely responsible for granting of accreditation. However, the DG/CEO, NiNAS exercises this responsibility in consultation with the Accreditation Advisory Committee (AAC). NiNAS has issued an impartiality policy statement in line with the provisions of Clause 4.4.3 of ISO/IEC 17011:2017 to provide accreditation services in an impartial manner. The impartiality policy is publicly available on the NiNAS website.

By making a public declaration of the impartiality of its accreditation processes, NiNAS undertakes to determine risks to its impartiality on an on-going basis. The risk assessment process will be conducted on an on-going basis through:

- Annual meeting of the Board of Directors
- Accreditation Advisory Committee (AAC) meetings
- Routine monthly staff meeting
- Management Review meetings

The structure of NiNAS ensures that personnel (permanent, temporary, contract or part time) who conduct the assessments of CABs are different from those who make accreditation decisions.



3.2 Sources of Risks to Impartiality

The management of NiNAS has identified the following sources of risks to the impartiality of its accreditation activities:

- a) NiNAS management and ownership
- b) NiNAS personnel
- c) Contracts with CABs and other stakeholders
- d) Assessors
- e) Committee members
- f) NiNAS Services
- g) Sources of finance

3.2.1 Management and Ownership

NiNAS is a company limited by guarantee and governed by a Board of Directors whose membership is drawn from major stakeholders in the accreditation business. The constitution of the Board is such as to ensure that no particular interest group dominates in line with its commitment to impartiality.

Some of the Board members represent stakeholders that offer conformity assessment services. NiNAS policies and procedures are developed and implemented to ensure that they do not exert any undue influence on the accreditation process. The accreditation offered by NiNAS is not conditional upon the membership of this board. Although the DG/CEO reports to the Board, the decision to award accreditation solely lies with the DG/CEO who relies on the recommendations of the independent Accreditation Advisory Committee (AAC).

3.2.2 Personnel and Assessors

ISO/IEC 17011:2017, 4.4.4 - Accreditation Body Personnel and Related Committee shall be free from undue commercial, financial and other pressures.

NiNAS personnel and assessors are directly involved in the accreditation process. The impartiality of the accreditation process is ensured by making sure that NiNAS personnel have signed a contract to abide by the Code of Conduct that commits them to impartiality, confidentiality and declaration of any conflict of interest in the discharge of their responsibilities.



Personnel need the approval of NiNAS in order to conduct any work outside the normal NiNAS business. Assessors under contract with NiNAS are made to sign an undertaking at the point of their engagement, to abide by the NiNAS Code of Conduct with regard to impartiality and confidentiality.

In selecting the assessment team members, the Director of Accreditation shall ensure that each team member is free from any interest that might cause them to act in an impartial manner. Assessors selected to conduct an assessment of a conformity assessment body (CAB) are made to declare any previous or present conflict of interest that they may have in the CAB. This is in addition to signing the impartiality and confidentiality declaration forms. Assessors acting on behalf of NiNAS are not required to accept gifts from the CABs.

3.2.3 Committee Members

Members of the Accreditation Advisory Committee (AAC) are independent professionals representing different stakeholders in the accreditation business. They undergo trainings where the need for impartiality and confidentiality are emphasized. AAC members are also made to sign a contract committing them to impartiality, confidentiality and independence.

The final selection of the AAC members depends on their understanding of NiNAS policies and procedures, and the demonstration of their ability to remain objective, independent and impartial in the accreditation decision-making process.

The members of the Accreditation Advisory Committee (AAC) have the additional responsibility of assessing the risks to impartiality of the NiNAS accreditation activities.

NiNAS also applies the impartiality policy in the selection of the members of the Technical Committee (TC) for its accreditation activities.

3.2.4 NiNAS Services

NiNAS organises orientation, educational and training programmes on conformity assessment activities and quality infrastructure. NiNAS personnel participate as lecturers in these courses but are restricted to the provision of generic information that is freely available in the public domain. The training courses offered by NiNAS are not a pre-condition for accreditation.



When NiNAS provides a training course on ISO and/or IEC standard to a conformity assessment body, it ensures strict compliance to the provisions of clauses 4.4.11 and 4.4.13 of ISO/IEC 17011:2017 respectively. In the event that a CAB that requests for training and subsequently applies for accreditation, NiNAS shall take all necessary measures to ensure that the requirements of ISO/IEC 17011 with respect to impartiality are met. In this regard, NiNAS shall ensure that personnel who participate in such training courses will not be part of the assessment team.

The management of NiNAS ensures it does not offer consultancy either during assessment or during the provision of training courses. NiNAS recognises that assessors offer consultancy to CABs in their individual or personal capacities. However, an assessor shall not offer consultancy to an organisation where they have acted as an assessor until all nonconformities have been cleared and a decision made by the Accreditation Advisory Committee.

NiNAS provides advisory services to other accreditation bodies in the development of their accreditation programmes. NiNAS will also cooperate with relevant stakeholders in the development of accreditation schemes.

NiNAS does not offer any conformity assessment activities offered by the organisations that it accredits.

3.2.5 Contracts with CABs and other Organisations

NiNAS enters into contracts with both applicant and accredited organisations. NiNAS emphasises impartiality, confidentiality and independence of its accreditation services while entering into contracts with a CAB. The respective obligations of the parties are clearly specified in ISO/IEC 17011:2017 and amplified in the Accreditation Agreement. The Accreditation Agreement defines the obligations of the parties such that conflicts of interest are eliminated.

3.2.6 Memorandum of Understanding (MOU)

NiNAS enters into partnership with different private and public organisations through the signing of Memorandum of Understanding (MOU). These organisations include accreditation scheme owners. The MOUs vary in obligation from involvement in accreditation committees to sharing information on conformity assessment accreditation. Through its policies and procedures, NiNAS ensures that MOUs entered into with groups and organisations do not pose a risk to the impartiality of its accreditation services.



3.2.7 Sources of Financing and Support

The primary sources of funding for NiNAS' accreditation activities include the fees charged for the provision of accreditation services and organising training courses. However, NiNAS may accept financial support from donor agencies and NGOs as long as doing so will not pose a risk to the impartiality of its accreditation process.

NiNAS shall also accept payment from a third party for the provision of accreditation services to a CAB, subject to the analysis of risks to impartiality. NiNAS will not proceed with the provision of such accreditation service if it discovers that doing so will affect its impartiality and independence.

3.3 ISO/IEC 17011:2017, 4.4.6 - Risks to Impartiality

NiNAS' process for risk management is specified below in this document as Annex A. NiNAS has put in place a risk to impartiality process to identify, analyse, evaluate, treat, monitor and document on an ongoing basis the risks to impartiality arising from its activities. Risks to impartiality process relating to the sources identified above are treated by an appropriate risk management process discussed below.

3.3.1 Risk Assessment

The process of identifying and treating risks to impartiality of NiNAS accreditation activities will be managed by the Quality Manager and one or two other technical staff. Any issues arising from this process will be discussed at the staff meeting (management meeting). The risk assessment will focus on the NiNAS accreditation process; competence of assessors, experts and staff members.

The following steps are taken in the risk assessment process:

- a) Identification of the risk to impartiality
- b) Evaluation of the impact
- c) Risk ranking to demonstrate the seriousness of the impact
- d) Mitigation actions required to reduce risk to an acceptable level
- e) Actions implemented
- f) Follow-up evidence to ensure effectiveness of the of the actions identified



3.3.2 Risk Analysis and Grading

Risks to impartiality associated with the accreditation process are identified and graded in terms of the likelihood of the risks occurring and their likely impact on impartiality. Other risks associated with NiNAS’ activities are also identified and graded accordingly.

The 3x3 Risk Matrix below is used to grade risks to impartiality of the NiNAS accreditation process.

Pr ob abi lity	Impact			
		LOW	MEDIUM	HIGH
	LOW	N	D	C
	MEDIUM	D	C	B
	HIGH	C	B	A

Recommended actions for grades of risks	
Grade	Risk Mitigation
A	Mitigation actions, to reduce the likelihood (probability) and seriousness (impact), to be identified and implemented as soon as possible.
B	Mitigation actions, to reduce the likelihood and seriousness, to be identified and appropriate actions implemented during process implementation.
C	Mitigation actions, to reduce the likelihood and seriousness, to be identified and costed for possible action if resources permit.
D	To be noted - no action is needed unless grading increases over time.
N	To be noted - no action is needed unless grading increases over time.



3.3.3 Risk Management

For any identified risk, personnel or a relevant committee will treat the risk and prevent it from recurring and manage any adverse impacts when it occurs. Any risks found during the risk assessment will be rated and managed. The DG/CEO, Committee Members, assessment team members and NiNAS personnel are responsible for maintaining potential risks to impartiality. They are to ensure that the accreditation procedure is adequately followed, and resources are well managed. All personnel are obliged to report any potential or actual risks to impartiality of the NiNAS accreditation process.

3.3.4 Monitoring and Reviewing Risks

The Quality Manager in conjunction with the management shall ensure the review of the risk management plan on an annual basis; especially during Management Review meetings or at any other time that may be decided. The review will focus on the management of the risks, the effectiveness of the mitigation mechanisms and if there are new identified risks. A report containing any recommendations will be submitted to the DG/CEO annually for onward transmission to the Board of Directors.

4.0 Risk Evaluation of a CAB

When performing a risk evaluation of a CAB, NiNAS shall take an educated and informed decision on the risk profile of the CAB, the outcome of which may be that NiNAS will vary its assessment approach. As such, NiNAS should always consider the primary purposes of accreditation (those being that accreditation provides confidence that the CAB is producing valid outcomes to its conformity assessment activities, is competent and operates with independence and impartiality) and be aware of its responsibility to provide confidence in the CAB to the CAB's wider stakeholder community. To this end, NiNAS shall consider the impact of the CAB conducting an invalid conformity assessment activity as part of its risk evaluation.

Appendix C provides a list of some examples of risks related to the operation of a CAB that NiNAS may consider when evaluating the risk profile of the CAB. It is recognized that for several of the risks identified, NiNAS may not be able to perform a risk evaluation for that particular risk when the CAB is new. NiNAS shall make best endeavours and perform the evaluation on the information it knows or can easily determine.



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Risk identification and evaluation of a CAB will be performed before the on-site assessment and the result recorded on F-17-002 *Risks Relating to the Operations of a CAB*.

5.0 Conclusion

NiNAS implements an ISO/IEC 17011:2017 compliant management system and associated policies and procedures. The management system, through regular internal audit and peer assessments (where applicable), continues to provide a mechanism for identification, documentation and mitigation of potential and perceived conflicts of interest that may impact the impartiality of NiNAS' accreditation services. Mitigation actions have been taken to address all identified threats to the impartiality of NiNAS accreditation activities.

Analysis of threats to the impartiality of NiNAS accreditation activities will be reviewed on an annual basis in conjunction with the Management Review process.

NiNAS also considers risks related to the operation of CABs when planning assessments, assessment programmes and scope extensions, as referred to in ISO/IEC 17011:2017 clause 7.4.6, 7.9.3 and 7.10.1.

6. Forms

Form Number	Title
F-17-001	Impartiality Risk Analysis Form
F-17-002	Risks Relating to the Operations of a CAB



7. Document History

Modification No/Date	Proposed by	Page No.	Summary of Modification
01/04/2023	Quality Manager	All	General review

Annex A: Impartiality Risk Assessment

The template contained in this Annex is to be used to record the compliance with MP 17 (NiNAS Risk Procedure)

A.1 Risk Identification

A.1.1 What is the risk?

Potential Threats to NiNAS Accreditation Impartiality

A.1.2 When was it identified? By whom?

Ongoing analysis required by ISO/IEC 17011:2017, 4.4.6, and updated on a regular basis.

A.2 Risk Analysis and Evaluation



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A.2.1 What are the potential effects of the risk?

See preceding identification and analysis.

A.2.2 Does the risk present a threat or an opportunity?

Primarily risks

A.2.3 What is the likelihood (probability) of the risk(s)?

- a. Low
- b. Medium
- c. High

A.2.4 What is the impact of the risk(s)?

- a. Low
- b. Medium
- c. High

A.2.5 Based on the matrix in section 3.3.2 of NiNAS MP 015, what is the priority of the risk?

- a. Low
- b. Medium
- c. High
- d. Critical

A.3 Risk Treatment

Describe the plan to mitigate the threat or maximize the opportunity, including pertinent activities or milestones, deadlines, and the assigned Risk Owner.

See preceding identification and analysis.

A.4 Risk Monitoring

A.4.1 Describe the effectiveness of implementation of the Risk Treatment plan.

A.4.2 Did the implementation effectively treat the risk? (yes/no)



Yes

A.4.3 If the implementation did not effectively treat the risk, was a new treatment plan created? (yes/no)

N/A

(If yes, please complete this section of the form again, adding a description of the effectiveness of the new plan.)

A.4.4 Is there any residual risk? (yes/no) (If yes, please describe.)

See preceding identification and analysis.

A.4.5 In the view of top management, is the residual risk in the level of acceptable risk? (yes/no)

Yes

(If no, please consider the residual risk a newly identified risk.)

Annex B: Impartiality Risk Analysis

Areas/Source	Risks	Likelihood	Impact	Controls
Funding sources/ Finance	a. Financial loss due to less request for accreditation and training; b. Non-payment of annual accreditation fee by accredited CABs; c. Commercial and other pressures from donor organisations and individuals; d. Non-compliance with financial regulations.			



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Personnel/ Assessors/ Committee Members	<p>a. Assessors and personnel having limited knowledge of the accreditation process;</p> <p>b. Personnel and contract assessors acting impartially during documentation review and assessments;</p>			
Training	<p>a. Providing consultancy during training;</p> <p>b. Giving preferential treatment to CABs that received training from NiNAS;</p> <p>c. Training perceived as a pre-condition for accreditation</p>			
Contracts with CABs/ MOUs	<p>a. Misinterpreting the provisions of the contract and MOUs.</p>			

Annex C: Risks Related to the Operation of a CAB

Risk area	Risks to the fulfillment of the accreditation requirements by the CAB
Activities	<ul style="list-style-type: none"> ● Complexity of the scope of accreditation (e.g. number of different competencies required by NiNAS to cover the scope); ● Organization of CAB (e.g. the number of sites, geographical distribution, foreign sites, multiple management system for different departments/standards); ● Complexity and criticality of external (legal) requirements and rules (national and regional) for specific sector (e.g. diversity of regulatory texts and requirements);
Personnel	<ul style="list-style-type: none"> ● Competence and experience of CAB’s personnel; ● Turnover of CAB’s personnel (in comparison to industry norms); ● Resource capacity and capability to provide CAAs in timely and competent manner;



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Locations	<ul style="list-style-type: none">• Level of control and monitoring demonstrated by the CAB for any satellite location;• Criticality of activities performed at satellite locations (e.g. process development and approval, contract review, decision making, competence approval and monitoring of personnel);• Type of location - permanent, temporary, mobile;
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