

ASI Impartiality Reviews Procedure

Version 1, June 2020

1. PURPOSE

This procedure describes ASI’s requirements for the conduct of annual Impartiality Reviews, which form part of the ASI Oversight Mechanism. The purpose of the Impartiality Reviews is to assess decision-making processes relating to ASI assurance and identify any risks to impartiality which should be mitigated or avoided.

Drawing from the ISEAL Assurance Code¹, the relevant desired outcomes of the broader ASI Oversight Mechanism are that:

- **The ASI assurance system results in accurate assessments of compliance:**
 - The assurance system is implemented impartially
 - The assurance system is implemented consistently
- **Effectiveness and efficiency of the ASI assurance system are improved over time:**
 - Risks to the integrity of the assurance system are managed
 - The scheme owner is responsible for and makes improvements to the assurance system

2. SCOPE AND APPLICATION

ASI recognises that it carries overall responsibility for the effective functioning and ongoing improvement of the ASI assurance system. ASI retains the authority to define and oversee implementation of this procedure by the ASI Secretariat and other parties, including independent reviewers, ASI Accredited Auditing Firms, and ASI Accredited Auditors.

ASI Accredited Auditing Firms must provide all reasonable assistance to ASI, and procure that their ASI Accredited Auditors also provide all reasonable assistance to ASI, whenever requested by ASI to assist ASI to ensure the effective functioning and ongoing improvement of the ASI assurance system.

3. DEFINITIONS

Term	Definition
ASI Accreditation	A recognition by ASI of the necessary competence to carry out ASI Audits.
ASI Accredited Auditing Firm	A Conformity Assessment Body meeting ASI’s objective selection criteria and accredited to carry out ASI Audits.
ASI Accredited Auditor	A qualified person individually accredited by ASI who conducts ASI Audits on behalf of and under the responsibility of an ASI Accredited Auditing Firm.
ASI Accreditation Scope	The ASI Accreditation Scope is the extent to which an ASI Accredited Auditing Firm and/or ASI Accredited Auditor can conduct ASI Audits, defined by: <ul style="list-style-type: none"> • ASI Standards • Geographic Scope • Aluminium Supply Chain Activities • Relevant Knowledge

¹ [ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards](#)
Relevant ISEAL Assurance Code clauses are 5.5.4 Evaluation of competency and 5.6.2 Auditor impartiality.

Term	Definition
	<ul style="list-style-type: none"> Lead Auditor status
ASI Audit	Systematic, independent and documented process for obtaining and assessing objective evidence to determine the extent to which the requirements for ASI Certification are fulfilled by an ASI Member. Audit types include Certification Audits, Surveillance Audits and Re-Certification Audits. <i>See the ASI Assurance Manual for more information.</i>
ASI Certification	An attestation issued by ASI, based on the results of an ASI Audit by an ASI Accredited Auditing Firm, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.
ASI Secretariat	Individuals employed or contracted by ASI to carry out Secretariat functions for the organisation. This includes responsibility for implementation of the ASI assurance system, including the Oversight Mechanism as noted.
Board	ASI Board as defined in the ASI Constitution.
Impartiality	Presence of objectivity. Other terms that are useful in conveying the element of impartiality include “independence”, “freedom from conflict of interests”, “freedom from bias”, “lack of prejudice”, “neutrality”, “fairness”, “open-mindedness”, “even-handedness”, “detachment” and “balance”. <i>(adapted from ISO/IEC 17011:2017)</i>
Member	An entity or group of entities that is a current member of one of ASI’s six membership classes: <ul style="list-style-type: none"> Production and Transformation (eligible for ASI Certification) Industrial Users (eligible for ASI Certification) Civil Society Downstream Supporters Associations General Supporters
Oversight	Assessment of an assurance provider’s demonstration of competence to carry out specific assurance tasks. <i>(adapted from ISO 17000, sourced from ISEAL Assurance Code V2.0)</i>
Reviewer	An individual or entity that carries out a review process under this Impartiality Review Procedure.

4. REFERENCES

- ASI Assurance Manual
- ASI Oversight Mechanism
- ASI Auditor Accreditation Procedure
- ASI Auditor Competence and Assessment Procedure
- ASI Complaints Mechanism
- ASI Certification Audit Report Oversight Assessment Procedure
- ASI Management Review Procedure
- ASI Monitoring and Evaluation Plan
- ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards
- ISO/IEC 17011:2017 *Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies.*

5. PROCEDURE

5.1. Process Overview

1. Impartiality Reviews form part of the ASI Oversight Mechanism, and are conducted by an independent Reviewer to address the following objectives:
 - *directly* evaluate impartiality of decision-making by the ASI Secretariat for ASI Accreditation (through application reviews and competence evaluations)
 - *indirectly* evaluate impartiality of decision-making by ASI Accredited Auditing Firms for ASI Certification (through ASI Audit Report Oversight Assessments)
 - identify risks to the ASI assurance system
 - identify improvement opportunities for the ASI assurance system.
2. An Impartiality Review will be conducted annually for ASI from 2020.
 - The first review will assess decision-making activities undertaken during 2020.
 - Subsequent annual reviews will assess decision-making activities in the period of the previous calendar year.
3. Impartiality Reviews consist of five main stages, illustrated in Figure 1.

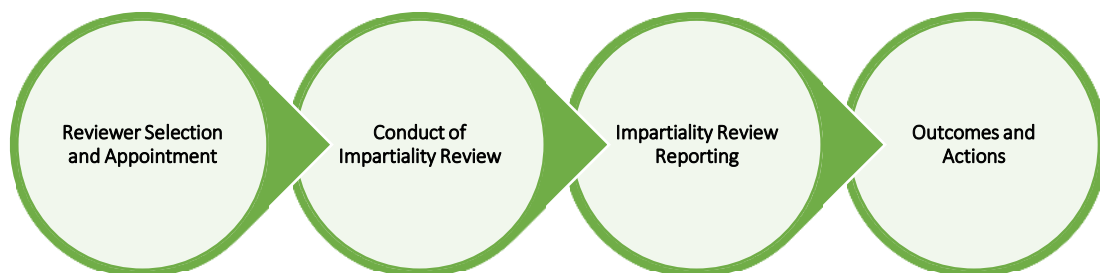


Figure 1 – ASI Impartiality Reviews processes

5.2. Stage 1 – Reviewer Selection and Appointment

4. Desired competencies and attributes of Reviewers include:
 - Experience with assurance, certification and/or accreditation systems
 - Experience with independent reviews or similar Oversight processes
 - Independence from ASI, ASI Accredited Auditing Firms and ASI Members
 - Language competency in English
 - Successful completion of required ASI training and assessment, the components of which will be set by the ASI Secretariat.
5. Potential candidates will be identified through a search process undertaken by the ASI Secretariat. Supporting documentation such as resumés and training records will be maintained on file.
6. The ASI Secretariat will select a Reviewer based on their relevant experience and the objectives of the Impartiality Review.

7. An ASI contract with the selected Reviewer will be agreed and executed to formalise an appointment, and will cover:
 - Objectives, activities and outcomes of the Impartiality Review
 - Remuneration and coverage of reasonable expenses properly incurred
 - Confidentiality of ASI, Auditor and Member information
 - Other terms and conditions.

5.3. Stage 2 – Conduct of Impartiality Reviews

8. The scope of an Impartiality Review covers decision-making activities relating to ASI Accreditation and ASI Certification during a nominated period under review.
 - The ASI Secretariat will provide the Reviewer with access to a list of accreditation and certification decisions for that period.
9. The Reviewer will propose an appropriate methodology to meet the overall review objectives identified in clause 1 of this procedure. The methodology would normally involve sampling of accreditation and certification decisions based on an overall representative sample.
 - The ASI Secretariat may also nominate a particular focus for sampling in a given year, based on ASI Management Reviews or other processes. For example, this could seek a deeper review of recent system improvements, a supply chain activity, region, Audit Firm or Auditor, or a detailed aspect of the ASI Accreditation or Oversight process.
10. Once the Reviewer has nominated the sample of accreditation and certification decisions for the Impartiality Review, the ASI Secretariat will provide the Reviewer access to relevant documentation relating to the nominated sample, including:
 - For certification decisions, relevant audit reports and oversight assessments (through elementAI)
 - For accreditation decisions, accreditation application reviews and witness assessments (through Box links)
 - ASI policies and procedures including the ASI Oversight Mechanism and its supporting procedures and the ASI Assurance Manual.
11. The Reviewer will proceed to review the documentary records provided, and may gather additional information from interviews with the ASI Secretariat and other parties as appropriate.

5.4. Stage 3 – Impartiality Review Reporting

12. The Reviewer shall prepare an Impartiality Review Report for submission to the ASI Secretariat.
 - This should normally be prepared within an 8 week period following receipt of the relevant documentation for review.
13. This Impartiality Review Report shall summarise:
 - Scope of the review
 - The methodology and approach
 - Findings with supporting evidence
 - Identified risks or issues, with supporting evidence
 - Suggested improvement opportunities
 - Final remarks and conclusions.
14. The ASI Secretariat shall review the Impartiality Review Report and liaise with the Reviewer on any matters for clarification.

5.5. Stage 4 – Outcomes and Actions

15. The ASI Secretariat will table the Impartiality Review Report for discussion with the ASI Standards Committee.
 - Sections may be anonymised, where necessary, with due regard for commercial confidentiality and privacy of personal information.
16. Identification of any major issues, minor lapses or other recommendations will be duly considered, as will other actions that may be determined to be relevant. Actions that the ASI Secretariat may undertake include:
 - Communication of the outcomes of the Review to stakeholders
 - Improvements to ASI training
 - Improvements to other ASI processes
 - Follow-up investigations, including Witness Assessments
 - Review of ASI Accreditation or Certification decisions
 - Processes in accordance with the ASI Complaints Mechanism.
17. Appeals and objections by any party may be submitted in accordance with the ASI Complaints Mechanism.
18. Impartiality Reviews form part of the ASI Oversight Mechanism, and will thus be further inputs to:
 - ASI’s Management Review processes
 - ASI’s Monitoring and Evaluation program
 - ASI’s Standards Revision processes.

5.6. Roles and Responsibilities – ASI Secretariat

19. The table below sets out key roles and responsibilities within the ASI Secretariat for Impartiality Reviews:

Role	Responsibilities
Director of Assurance	<ul style="list-style-type: none"> • Overall management of Impartiality Reviews. • Identifying and actioning opportunities to improve ASI’s systems.
elementAI Manager	<ul style="list-style-type: none"> • Providing information for Impartiality Reviews as appropriate. • Actioning identified improvement opportunities through <i>elementAI</i> as appropriate.
Learning Manager	<ul style="list-style-type: none"> • Providing information for Impartiality Reviews as appropriate. • Actioning identified improvement opportunities through <i>educationAI</i> as appropriate.
CEO	<ul style="list-style-type: none"> • Approving new or updated procedures. • Approving the appointment of Reviewers. • Providing appropriate resources for Impartiality Reviews to be carried out efficiently and effectively. • Reporting any material issues or significant improvement opportunities to the Board.

6. RECORDS

20. Records of Impartiality Reviews and supporting information will be securely maintained by the ASI Secretariat for at least 10 years from the date the records were generated.

7. DOCUMENT CONTROL

Document Name	ASI Impartiality Reviews Procedure
Document ID	ASI-PRO-13
Revision	Version 1
Publication Date	June 2020
Approved By	CEO
Next Review Date	3 years or as required

Please refer to the *ASI Box Folder > Assurance Model > Oversight > Impartiality Reviews* for the latest version of this procedure.