



الوكالة الوطنية للأمن السيبراني
National Cyber Security Agency

National Information Security Compliance Framework (NISCF) – General Appeals and Complaints Policy

[NCSA-NISCF-GACP]

Policy

National Cyber Security Agency (NCSA)

September 25, 2023

V1.0

Public



Document Control

Document Details	
Document ID	NCSA-NISCF-GACP
Version External	V1.0
Classification & Type	Currently Confidential to be made Public after approval
Abstract	This document is the policy for high-level direction and governing rules for the appeals and complaints related to the National Information Security Compliance Framework (NISCF) Services.



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National Cyber Security Agency

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National Cyber Security Agency (NCSA) has designed and created this publication, titled "NISCF Appeals and Complaints Policy" - V1.0 - Public, in order to set the high-level direction and governing rules for the appeals and complaints related to the National Information Security Compliance Framework (NISCF) Services.

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LEGAL MANDATE(S)

Based on Emiri Decree No 1 of year 2021, National Cyber Security Agency (NCSA) – National Cyber Governance and Cyber Assurance Affairs (NCGAA) is the entity responsible for issuing certificates for Technology and Information Security service providers and Certificates of Compliance with National Information Security standards and policies.

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1. Introduction

The National Information Security Compliance Framework (NISCF) allow the right for organizations applying for NISCF Services and Certified or Accredited organizations to appeal decisions related to their applications, Certification or Accreditation. It also has a complaint mechanism that allow any organization or individual to complaint about Certified Organizations, Accredited Service Providers, Cyber Assurance Department or organizations that misuse the NISCF Services symbol, title, credential or any other demarcation.

In effort to improve the NISCF Services, NCSA developed this document, titled "National Information Security Compliance Framework (NISCF) – General Appeals and Complaints Policy" - V1.0 - Public, to set the high-level direction and governing rules for the appeals and complaints related to the National Information Security Compliance Framework (NISCF) Services.



2. Purpose and Scope

2.1. Purpose

The purpose of this document is to set the high-level direction and governing rules for the appeals and complaints related to the National Information Security Compliance Framework (NISCF) Services.

2.2. Scope

This policy applies to all NISCF Services.



3. Key Definitions

Appeal	Request by an individual or an organization that is directly impacted by an NISCF Service decision made by NCSA to reconsider the decision that was made regarding its request for NISCF Service or its awarded certificate, title, credential or other demarcation.
Appellant	Individual or organization that lodged an appeal.
Authority	Person, organization or part of an organization that have the administrative power and control necessary to exercise certain actions.
Causality	A relationship that describes the cause of something (effect).
Certificate	A document attesting a fact and evidence something.
Closure	A process to end something.
Complainant	Individual or organization that lodged a complaint.
Complaint	Expression of dissatisfaction, other than appeal, by a third-party to NCSA relating to NISCF Services.
Decision	Conclusion, based on results of review, that fulfilment of specified requirements has or has not been demonstrated.
Discriminatory treatment	Different treatment that is unfair or prejudicial based on characteristics or actions that shall not have resulted in a different treatment.



Legally enforceable agreement

Contract that hold its signatories legally accountable and / or responsible for the duties in defined the contract in a specified jurisdiction.

National Information Security Compliance Framework

Is the umbrella under which all compliance initiatives, owned by the National Cyber Security Agency (NCSA) or other government or non-government entities, directly or indirectly, that have for primary goal to provide cyber security assurance and can have a material impact on national Qatar cyber security ecosystem, will be developed and maintained.

Operation

Activities performed in relation to NISCF by NCSA and / or third-parties on behalf of NCSA to be able to take decision related to NISCF Services.

Override

Prevail or take precedence over something.

Overrule

Determine that something that occurred previously is invalid and its effects shall be cancelled.

Policy

A formal statement of a principle (an organizational decision) that should be followed by its intended audience to achieve the stated objectives of the organization.

Principle

A fundamental idea or rule that provide direction and guidance on how to operate.

Procedure

Defines the established and / or mandatory way of performing the steps or actions defined in a process.

Process

Defines the series of steps or actions (including the inputs, outputs, and processing) that needs to be taken in order to achieve a particular objective.



Request	Formal written demand made by an individual or an organization related to a NISCF Service through specified means toward an authority.
Rule	A written statement that specific stakeholders shall conform to and comply with.
Spirit	The aim or purpose of something.
Stakeholders	A person, group of persons or moral entity(ies) having clear interest and / or responsibility in the NISCF Services.
Standard	Defines the requirements that needs to be met in application of policies.
Sustain	Determine that something that occurred previously is valid and its effects shall continue.
Title	Denomination used to identify a person, an organization, group of persons or organizations in relation to the NISCF Services.
Valid	Something that is genuine a considered as authentic and accepted.
Value	Standard and principle of expected behavior.



4. Policy Statement(s)

4.1. NISCF's Appeals and Complaints Authority

- 4.1.1.1.1. Director of National Cyber Governance and Assurance Affairs (NCGAA) of National Cyber Security Agency (NCSA) has been empowered with the authority over the appeal and complaints related to NISCF Service and shall be responsible for all decisions related to appeals and complaints.
- 4.1.1.1.2. National Cyber Security Agency (NCSA) shall collect and review all necessary information to confirm the validity of an appeal or a complaint.
- 4.1.1.1.3. The reviews and decisions related to appeals and complaints, shall be performed and taken by individual(s) that were not implicated in the non-conformance to NISCF Services rule(s), breaches of principle(s) and value(s) of the NISCF Services subject of the complaint, or the NISCF Services decisions subject of the appeal and the related reviews that contributed to forming the decisions.
- 4.1.1.1.4. The Director of NCGAA decisions shall not override NISCF's Services decisions subject of an appeal or a complaint.
- 4.1.1.1.5. The act of lodging complaints related to NISCF's operation and appeals of NISCF Services decisions, and their reviews and resulting decisions, shall not give rise to discriminatory treatment against the appellant or complainant.

4.2. Complaints

4.2.1. Complaints types

4.2.1.1. Complaints against NISCF's operation authorities

- 4.2.1.1.1. Complaints against NISCF's operation authorities shall only be lodged if:
- 🕒 The activities performed by against NISCF's operation authorities in relation to NISCF's operation do not conform to NISCF Services rule(s) (i.e., set in NISCF Services policy, standards, processes, procedures, legally enforceable agreements, terms and conditions...);
 - 🕒 NISCF's operation authorities breaches the principle(s) and value(s) of the NISCF Services and / or the spirit of the NISCF Services rule(s); or



- ⦿ NISCF Services rule(s) violate(s) the NISCF Services principle(s) and value(s).

4.2.1.1.2. Complaints against NISCF's operation authorities shall not be lodged to provide general point of views, feedbacks or improvements of the NISCF Services rule(s).

4.2.1.2. *Complaints against an organization or an individual holding NISCF Services symbol, title, credential or any other demarcation*

4.2.1.2.1. Complaints against an organization or an individual holding NISCF Services symbol, title, credential or any other demarcation shall only be lodged if:

- ⦿ An organization or an individual holding NISCF Services symbol, title, credential or any other demarcation does not conform to NISCF Services rule(s) (i.e., set in NISCF Services policy, standards, processes, procedures, legally enforceable agreements, terms and conditions...); or
- ⦿ An organization or an individual holding NISCF Services symbol, title, credential or any other demarcation breaches the principle(s) and value(s) of the NISCF Services and / or the spirit of the NISCF Services rule(s).

4.2.1.3. *Other types of complaints*

4.2.1.3.1. Complaints against an organization or an individual other than, an organization or an individual holding NISCF Services symbol, title, credential or any other demarcation or NISCF's operation authorities, shall only be lodged if:

- ⦿ The organization or individual against which the complaint is lodged, falsely stated or claimed that it holds or held an NISCF Services symbol, title, credential or any other demarcation; or
- ⦿ The organization or individual against which the complaint is lodged, brought into dispute, NCSA, NCGAA or NISCF Services.

4.2.2. *Complaints lodging*

4.2.2.1.1. Stakeholders to NISCF Services shall lodge a complaint using official communication channels and through means dedicated by the NCGAA for NISCF's complaints, in conformance with the relevant NISCF processes and



procedures for lodging related complaints, reviewing and responding to them by the appropriate NISCF's complaints authority, as defined in section [4.1](#).

4.2.2.1.2. A complaint shall not be lodged with a subject for which the complainant has already lodged a previous complaint, under review (see section [4.2.3](#)) or closed (see statement [4.2.4.1.4](#)).

4.2.3. *Complaints review*

4.2.3.1.1. NCGAA shall review a lodged complaint and determine if it relates to a NISCF Service.

4.2.3.1.2. If the complaint shall not be reviewed, because it was not lodged in conformance with statement [4.2.2.1.1](#), or does not fall under the complaints types referred to in section [4.2.1](#), the complaint shall not be accepted and justification provided to the complainant.

4.2.3.1.3. NCGAA shall acknowledge receipt of a valid complaint.

4.2.3.1.4. NCGAA shall review the complaint in order to allow the Director of NCGAA to make an informed decision and determine the necessary actions to be taken by NCGAA and / or the organization or individual against which the complaint is lodged.

4.2.3.1.5. The Director of NCGAA may request further information, if judged to be necessary, NISCF's operation authorities, the complainant, and / or organization or individual against which the complaint is lodged to complete its review.

4.2.4. *Complaints effects*

4.2.4.1.1. When a complaint is lodged against an organization or an individual holding NISCF Services symbol, title, credential or any other demarcation as defined in section [4.2.1.2](#), NCGAA shall determine the impact on the awarded certificate, title, credential or other demarcation.

4.2.4.1.2. When a complaint is lodged against an organization or an individual holding NISCF Services symbol, title, credential or any other demarcation as defined in section [4.2.1.2](#), NCGAA shall inform the organization or the individual subject of the complaint, if the notification does not risk to jeopardize the review of the complaint.



4.2.4.1.3. NCGAA shall update the complainant on the progress made on a lodged complaint when requested by the complainant.

4.2.4.1.4. NCGAA shall, within sixty (60) working days¹ from the complaint acknowledgement, inform the complainant of the completion of the review of a complaint, the outcome (e.g., actions taken or to be taken by NISCF's operation authorities and / or the organization or individual subject of the complaint...) and the closure of the complaint.

4.2.4.1.5. Decisions related to NISCF's Services complaints are final and shall not be appealed.

4.3. Appeals

4.3.1. Appeals lodging

4.3.1.1.1. Appeals shall only be lodged against a specific NISCF Service decision, made by NCGAA in relation to an NISCF Service, by the individual or organization that is directly impacted by that decision, in relation to its request for NISCF Service or its awarded certificate, title, credential or other demarcation.

4.3.1.1.2. Appeals shall be lodged within thirty (30) calendar days from the date of communication to the appellant of the decision subject of the appeal.

4.3.1.1.3. An appeal shall only be lodged if:

- It fulfils the statement [4.3.1.1.1](#);
- It clearly specifies the NISCF Services rule(s) (i.e., set in NISCF Services policy, standards, processes, procedures, legally enforceable agreements, terms and conditions...) that NISCF's operation authorities did not conform to, in relation to the appellant's request for NISCF Service or its awarded certificate, title, credential or other demarcation; and
- It provides clear causality between the non-conformance referred to in the second indentation of this statement (reference [4.3.1.1.3](#)) and specific decision made by NISCF's operation authorities subject of the appeal.

¹ Excluding National Holidays as declared by Emiri Diwan



- 4.3.1.1.4. Appellant shall lodge an appeal using official communication channels and through means dedicated by the NCGAA for NISCF's appeals, in conformance with the relevant NISCF processes and procedures for lodging related appeals, reviewing and responding to them by the appropriate NISCF's appeals authority, as defined in section [4.1](#).
- 4.3.1.1.5. An appeal shall not be lodged against a specific decision, made by NISCF's operation authorities in relation to an NISCF Service, for which the appellant has already lodged a previous appeal, under review (see section [4.3.2](#)) or closed (see statement [4.2.4.1.4](#)).
- 4.3.1.1.6. Information shared during an appeal lodging and review shall not include:
- 🕒 New information or evidence that has been created or communicated to NISCF's operation authorities after that the decision subject of the appeal has been taken;
 - 🕒 New information or evidence that has been created before that the decision subject of the appeal has been taken but has not been previously communicated to NISCF's operation authorities; and
 - 🕒 Existing information or evidence that has been communicated to NISCF's operation authorities before that the decision subject of the appeal has been taken, in a communication that was not in conformance with the NISCF Services rule(s) (i.e., set in NISCF Services policy, standards, processes, procedures, legally enforceable agreements, terms and conditions...) related to the appellant's request for NISCF Service or its awarded certificate, title, credential or other demarcation.

4.3.2. Appeals review

- 4.3.2.1.1. NCGAA shall review a lodged appeal and determine if it relates to a NISCF Service.
- 4.3.2.1.2. If the appeal was not lodged in conformance with statements defined in section [4.3.1](#), the appeal shall not be accepted and justification provided to the appellant.
- 4.3.2.1.3. NCGAA shall acknowledge receipt of a valid appeal to acknowledge the receipt of the appeal.



4.3.2.1.4. NGCAA shall review the appeal in order to form an informed decision.

4.3.2.1.5. The Director of NGCAA may request further information, if judged to be necessary, from the appellant, and / or NISCF's operation authorities to complete its review.

4.3.3. Appeals effects

4.3.3.1.1. For each valid appeal lodged, the Director of NGCAA decision shall be limited to determine if the decision subject of the appeal shall be sustained or overruled.

4.3.3.1.2. NGCAA shall update the appellant on the progress made on a lodged appeal when requested by the appellant.

4.3.3.1.3. NGCAA shall, within sixty (60) working days² from the appeal acknowledgement, inform the appellant and the authority that took the NISCF Service decision subject of the appeal, of the outcome and the closure of the appeal.

4.3.3.1.4. Decision related to NISCF's Services appeals are final and shall not be appealed.

4.3.3.1.5. When the Director of NGCAA decides to overrule the NISCF Service decision subject of the appeal, the course of actions that shall be taken shall be determined by the appropriate authority that took the NISCF Service decision subject of the appeal.

² Excluding National Holidays as declared by Emiri Diwan



5. Compliance and Enforcement

5.1. Compliance Process

All stakeholders to the NISCF Services shall conform with the statements defined in this policy.

5.2. Roles and Responsibilities

National Cyber Governance and Assurance Affairs (NCGAA) is responsible for enforcing and monitoring conformance to this policy.

5.3. Transitioning and effective date

5.3.1. *Effective date*

This policy is effective from the date of publishing.

5.3.2. *Transition period*

This policy takes effect immediately following its publication. Appeals and complaints related to NISCF Services activities subject of an appeal or a complaint (e.g., decision, non-conformity or breach...) shall be processed in conformance with this policy.

5.4. Exceptions and deviations

5.4.1. *Exceptions to Policy Statements*

Exceptions to this policy shall only be defined by the National Cyber Security Agency (NCSA) through another policy and / or any NCSA's organizational structure that has been given the authority over the NCGAA or NISCF Services.

5.4.2. *Deviation process from Policy Statements*

Deviation from policy statements shall be formally authorized in written by the National Cyber Security Agency (NCSA).

5.4.3. *Sanctions*

National Cyber Security Agency (NCSA) reserves the right to not accept NISCF Services appeals and complaints from stakeholders that do not conform with the statements defined in this policy.



6. Annexes

6.1. Acronyms

NCGAA	National Cyber Governance and Assurance Affairs.
NCSA	National Cyber Security Agency.
NISCF	National Information Security Compliance Framework.

6.2. Reference

Emiri Decree No 1 of year 2021.



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