

Quality Management System

Management Policy

MP-15, Management of Impartiality

Issued By:	Philip Moseley	Authorised by:	Alison Kelly
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Section 1.1 Purpose

The purpose of this procedure is to define the processes, responsibilities and ownership required for the undertaking of safeguarding the impartiality of the organisation.

Section 1.2 Scope

This procedure applies to all areas of Iso Comply including general business and certification body related processes.

Section 1.3 Sequencing

Impartiality Committee reviews are required to take place on a 6-monthly basis. The management of impartiality, including threats, is ongoing. Additional ad-hoc meetings / conference calls can be added as and when required to respond to changing circumstances.

2.1 Impartiality Committee Review Agenda

The Interim Chief Executive, the Client Manager, Group Compliance General Manager where appointed and relevant and a minimum of two external independent individuals with relevant and current experience comprise the Impartiality Committee.

Generally, during the year, the Impartiality Committee should address the following agenda items under which the Impartiality Committee meetings should be recorded:

1. Present
2. Apologies for absence
3. In attendance
4. Confirmation of the minutes of the previous meeting
5. Matters arising (not otherwise on the agenda)
6. Training
 - a. Presentation on the Impartiality requirements of BS EN ISO/IEC 17020/21, and the responsibility and authority of this Committee. (Inaugural and thereafter as required)
7. Consideration of threats to impartiality
 - a. Review of client income to ensure no client has over 25% of total annual income
 - b. Current identified threats and how these are addressed
 - c. Newly identified threats and how these may be addressed
 - d. Recommendations and agreements
8. Complaints against the Inspection/Certification Body
 - a. To receive and consider report from the Technical Manager
 - b. Recommendations and agreements
9. Consideration of management systems certification processes
 - a. Review of sample of current certifications and surveillance audits
 - i. (Chosen by the committee and/or chairperson from representative list)
 - b. Recommendations and agreements
10. Consideration of Audits carried out on the Certification Body
 - a. External audit reports on the Certification Body
 - b. Internal audit reports
 - c. Recommendations and agreements
11. Consideration of Board Minutes

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12. Review and Approval of Policies and Procedures for Impartiality
13. Consideration of any other relevant Committee
14. Any other business
15. Date, time and place of next meeting

2.2 Impartiality Review Scheduling

Impartiality Reviews shall be scheduled on the Internal Audit Programme and will be held annually.

Minutes will provide feedback to be included at the next Management Review Meeting.

Where additional Impartiality Committee ad-hoc meetings / conference calls are called, to respond to changing circumstances, records of these discussions will also be made available to the next Management Review Meeting.

2.3 Impartiality Review Outputs

The Office Manager is responsible for Impartiality Committee outputs provided for the Management Review Meetings, including

- Improvements relating to the effectiveness of the management system and its processes
- Improvement of the certification services
- Matters relating to impartiality

Any improvement actions resulting from the Impartiality Committee's input will be raised and managed as required.

2.4 Objectives For Impartiality

To evaluate possible threats to impartiality involved with the certification body processes.

Possible threats to impartiality include:

- Self-interest threats from a person or body acting in their own self-interest including financial interest
- Self-review threats. Person or body reviewing their own work or a consultant auditing his own work at a client of the certification body.
- Trust / familiarity threat. A person or body being too familiar and trusting of a process rather than seeking objective evidence.
- Intimidation threats. Person or body having a perception of being coerced by certification body staff, clients or consultants.

All perceived threats will be evaluated, analysed and documented with risk levels being awarded as per the reference documentation mentioned at the end of this procedure.

2.5 Management Of Impartiality

It is essential that Iso Comply Limited has top level management commitment to the management of impartiality.

A publicly available statement of impartiality has been produced and authorised by the Interim Chief Executive and accepted by the Impartiality Committee members. The statement confirms management commitment to manage and minimise any possible threats to impartiality relating to the certification process

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2.6 Methodology For Impartiality

The company has a process to identify, analyse and document the possibilities of conflict of interest arising from its relationships. This process includes evaluating possible threats to impartiality based on:

- Management / staff / sub-contractors / experts
- internal processes (procedures, hardcopy and electronic)

Iso Comply Limited does not carry out consultancy work. Any auditor who has been involved with a client in a consultancy capacity will not be allowed to audit that client for at least two years after the relationship has ended.

Iso Comply Limited will not certify another certification body and:

- does not outsource audits to management consultancy organisations.
- will not market its activities or be linked alongside management consultancy organisations, and will monitor consultants web pages to counteract inappropriate claims that may suggest that certification would be easier or less expensive if the client used Iso Comply Ltd.
- does not specify that certificates would be easier or less expensive if a particular consultant were used.
- will respond and take action to any threat to its impartiality from the action of other persons or organisations. See reference forms.

All inspection and certification personnel shall be impartial. Internal staff, external staff and committee members. They shall not be influenced by financial or other pressures.

2.7 Liability And Financing

Iso Comply Limited shall evaluate the risks arising from its certification activities and will ensure adequate resources / insurance to cover liabilities arising from its operations and shall not compromise its impartiality for financial gain. The certification body's sources of income shall be evaluated to demonstrate to the impartiality committee that any financial pressures shall not compromise its impartiality (no client has over 25% of total annual income).

2.8 Composition, Terms of Reference, Duties and Authority of the Impartiality Committee

Iso Comply Limited has set up a committee to safeguard the impartiality of the certification process. The committee meets to:

- Assist in developing policies relating to impartiality of the certification process.
- Counteract the tendency for the certification body to allow any commercial or other interests to detract from its impartial certification process.
- To advise on matters affecting confidence of certification including openness and public perception and to conduct a review at least annually of the impartiality of the full certification process including audit and certification decision making process.
- Agree, review and authorise the policies, impartiality declaration system, impartiality audits, client file audits and risk assessment audits to confirm that impartiality threats have been considered and managed.

The committee is structured and composed to ensure:

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- No single interest shall predominate and a balance of interests will be provided
- The committee will have access to all relevant information
- That if top management does not respect the advice of the committee, then they have the right to take any independent actions that they see fit i.e. they may inform authorities, accreditation bodies, stakeholders. Client confidentiality will be upheld.
- The committee is composed of senior management representatives together with non-Iso Comply Limited personnel. They may be selected from clients, representatives of trade associations, representatives of government or non-governmental bodies or consumer associations etc.

All members of the Impartiality Committee must sign CA04, Impartiality Committee Member Agreement.

2.9 Response To Threats Of Impartiality

Where a situation exists that has the potential to threaten impartiality, the Interim Chief Executive shall be immediately informed, who shall then be responsible for evaluation the nature of the threat and defining appropriate control mitigation measures where practical.

Any such assessments and actions taken, together with records of action, shall be recorded and made fully available to the Impartiality Committee.

When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of the certification body requesting certification from its parent), then certification shall not be provided.

CF-11 Impartiality Committee Meeting Minutes

The Group Compliance General Manager has overall responsibility for the execution of this procedure, with the direct assistance from the Office Manager.

Alison Kelly

Interim Chief Executive

01 March 2024