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KQ Certification Ltd.

Impartiality Policy

1.0 Purpose

The purpose of this policy is to set the parameters for the KQ Certification Limited (KQ Certification) Certification Body to manage its impartiality effectively and convey confidence to stakeholders that rely on the safety of its Certifications for their interests.

2.0 Scope

The scope of this policy applies to KQ Certification Ltd, its employees, contracted third parties, subcontractors (if used), clients and stakeholders. All are required ¹ and expected to abide by the provisions of this policy that are reasonably applicable to them.

¹ Non contracted Stakeholders are encouraged to abide by the provisions of this policy.

3.0 Responsibility and authority

Responsibility	
Director	The Director has ultimate authority for approval of the Certification Body’s Impartiality Policy and decisions related to it.
General Manager	The General Manager has responsibility for the definition of the Certification Body’s Impartiality policy, processes, and controls. In addition, the General Manager has responsibility for coordinating the implementation of the Certification Body’s Impartiality policy, processes, and controls.
Employees	Employees are each individually responsible, relative to their role, for the implementation of the Certification Body’s Impartiality policy, processes, and controls.
Contractors	Individual Contractors are each individually responsible, relative to their role, for the implementation of the Certification Body’s Impartiality policy, processes, and controls.
Sub-contractors	Subcontracting organisation, if used, are responsible, relative to their role, for the implementation of the Certification Body’s Impartiality policy, processes, and controls.
Clients	All clients are responsible for alerting the Certification Body to any potential impartiality or conflict of interest issue that they become aware of.
All Stakeholders	Stakeholders that are contracted to the Certification Body are responsible for the implementation of the Certification Body’s impartiality policy, processes, and controls, in accordance with their contract. Stakeholders that are not contracted to the Certification Body are encouraged to alert the Certification Body’s General Manager to any potential impartiality or conflict of interest issue that they become aware of.
Impartiality Committee	The Impartiality Committee has responsibility to meet, review matters of impartiality and make recommendations related to impartiality under its agreed Terms of Reference.
Authority	
Director	The Director has ultimate authority for the implementation of processes and controls that reflect the organisation’s Impartiality Policy (this document). This authority may be delegated to the General Manager as required.
General Manager	The General Manager, under the authority of the Director, has operational authority for the implementation of processes and controls that reflect the organisation’s Impartiality Policy (this document).
Impartiality Committee	The Impartiality Committee has authority for reviewing matters of impartiality and making recommendations to the Management Board of the Certification Body. Where the management has referred a matter of impartiality to the Impartiality Committee for decision the Impartiality Committee’s decision will be implemented by the Management Board of the Certification Body.

4.0 Reference documents

ISO 17021-1:2015: Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements

5.0 Policy

5.1 Introduction

KQ Certification Ltd., as the Certification Body, recognise that the aim of Certification is to provide confidence to all interested parties that a management system fulfils the specified requirements of the Standard(s) it is Certified to. This Policy is supported the Impartiality process (SP503).

5.2 Interested parties.

Parties that can have an interest in Certification, include:

- Employees and contractors of a Certified organisation
- Employee Groups (including unions and cooperatives)
- Subcontractors to a Certified organisation
- Suppliers to a Certified organisation
- Owners and Shareholders of the organisation
- Clients of Certification bodies
- Customers of Certified organisations
- Society (including the local neighbourhood), visitors to the organisation, workers families.
- Government, legal and regulatory authorities
- Consumers and society
- Active society groups (e.g. Environmental)
- Professionals interacting with the organisation (e.g. including Academics, Occupational Health and Safety, Healthcare and Medical).
- Non-Governmental Organisations (NGOs), industry Groups and Associations.

5.3 Employee and contractor responsibility

All employees of KQ Certification, and contractors to KQ Certification are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner, recognizing their responsibility to multiple stakeholders.

They must also ensure that they avoid or eliminate any actual conflict of interest or situation that could be perceived as a conflict of interest and immediately report it to their Line Manager.

Each of our employees and associates has responsibility for complying with this policy, our processes, procedures, guidelines and agreements with regard to impartiality.

Failure to comply may result in disciplinary action, up to and including termination of employment, or termination of contract for contractors.

5.4 Objective and fair assessment

KQ Certification provide an objective and fair assessment through their and certification process. Impartiality is a core value of the organisation.

KQ Certification uses relevant processes, procedures, and controls to safeguard the impartiality of its activities. We strive to deliver assessments and certification, where objectively justified, that provide confidence to the market and our stakeholders.

5.5 Impartiality Committee

To provide independent assessment of the Certification Body's operation, controls for impartiality and impartiality situations the organisation maintains an Impartiality Committee, with defined terms of reference. The Impartiality Committee operation in accordance with Impartiality Committee process (SP503-1).

The independent Impartiality Committee seeks to ensure sufficient weight and importance is attached to maintaining objectivity and impartiality in the strategy and operations of the Certification body. The Committee has been appointed by the Directors of the organisation with the remit to monitor all aspects of business activity.

Members of the impartiality committee are appointed to represent the interests of the parties that they represent or bring specialist skills (such as risk assessment, accreditation, or certification expertise) to the committee for the benefit of the organisation and its stakeholders.

5.6 Threats to Impartiality

In operating as a Certification Body, we recognise that there are threats to our impartiality. Whilst it is impossible to anticipate all the potential threats the following threats are highlighted:

- **Self-interest** – Where a threat arises from an individual, group of individuals or body acting in their own interest, limiting objectivity.
- **Non independent review** – Where a non-independent review is conducted of work completed, potentially limiting the objectivity of the review.
- **Familiarity** – Where threats that arise from an individual, group of individuals or body being overly familiar with, or basing their compliance or effectiveness conclusions on prior knowledge or supposition as opposed to a review of objective evidence to support conclusions made.
- **Influence** – Where a threat arises from a person, group of individuals, or body directly, indirectly or can be perceived as seeking to influence Certification assessment conclusions or Certification through pressure on those acting for the Certification Body.

The threats to impartiality are identified, analysed, actioned, and captured under the Impartiality risk assessment process (SP503-3).

5.7 Conflicts of Interest

A conflict of interest occurs when an individual's personal interests or relationships interfere with their professional obligations or judgment. In Certification terms this may be in the form of an individual or Group of individuals performing assessment activity, including Certification decision making, for an entity they have a close business or personal relationship with.

The processes, procedures and controls that KQ Certification employ to uphold impartiality are designed to recognise and eliminate actual or potential conflicts of interest. The following scenarios are recognised as a conflict of interest:

- Auditing an organisation where the auditor or decision maker has provided consultancy support or other services.
- Auditing an organisation where the auditor or decision maker has been employed or contracted to the organisation.
- Auditing an organisation where the auditor, a family member or friend has an interest.
- Making a Certification decision where the auditor, family member or friend has an interest.
- Accepting, directly or indirectly, any kind of personal advantage offered by the organisation or individual to be audited.
- Making a representation for the client organisation
- Giving preferential treatment to any supplier or other person doing business with KQ Certification to serve their personal interest.
- Use their position or contacts from KQ Certification to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship.

Although this policy details certain behaviors that may lead to a conflict of interest or the perception of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be reported.

5.8 Impartiality commitments and obligations

KQ Certification makes the following unambiguous commitments as part of its policy to ensure impartiality in the provision of its certification services:

- Committing employees and contractors to conduct their work in accordance with the organisation's Code of Ethics
- Having full authority and taking full responsibility for all its Certification decisions
- Ensuring that its assessment and support staff act impartially and are perceived to be impartial.
- Require all personnel to register any conflicts of interest as defined by this policy.
- Ensuring its relationships with other individuals and bodies does not compromise impartiality.

- Ensuring that activities are not marketed or offered as linked with the activities of a management system consultancy.
- Always responding to threats to its impartiality with appropriate action to eliminate or mitigate the risk.

KQ Certification equally shall not:

- Offer or provide management systems consultancy.
- Install, distribute, or maintain a product, process, or service, which is produced under a management system that it has certified.
- Offer or provide internal audits to its certified clients or those seeking its Certification.
- Outsource Certification audits to a management system consultancy.
- Use a member of staff, to assess an organisation, who has been active for the client organisation within the last two years from the date of the first day of the assessment.
- Certify the quality management system of another management systems certification body.

6.0 Reporting an actual or potential threat to impartiality.

Staff and contracted individuals are contractually obligated to report any potential or actual threat to impartiality to their Line Manager or the General Manager, as defined by their contract with KQ Certification Limited.

Where a non-contracted stakeholder identifies a potential or actual threat to impartiality, they are encouraged to report the situation to the KQ Certification General Manager or their deputy.

7.0 Records

Records in relation to the management of impartiality are maintained for a minimum of seven years, in accordance with the Records Management Policy P005.

Revision log		
Revision	Description of Change	Release Date
0.1	Initial draft	22 nd March 2024
1.0	Initial issue	28 th March 2024
1.1	Updated for readability	9 th May 2024