

QPA Accreditation & Certification Impartiality Policy

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1. Purpose / scope: policy statement

This policy describes the measures that QPA and its employees, contractors, committees and Impartiality and Audit Committee undertake to manage conflict of interest to ensure the objectivity and impartiality of our management system certification activities.

It is our policy that any certification activity for a client is undertaken by employees or contractors who:

1. Understand the concept of impartiality and agrees to the QPA Code of Conduct
2. Have signed a QPA Confidentiality Statement and Code of Ethics declaration
3. Have not provided management system consulting or internal management system auditing services to the client organisation within the last 2 years
4. Have no personal interest in the client organisation;
5. Have no undisclosed benefits that relates to the audit findings or success of the client.

It is our policy that any certification issued by QPA:

1. Is signed off by the Certification Authority
2. Represents a fair and unbiased assessment of the client's management system

The Board of Directors will use its best endeavors to appoint an Impartiality and Audit Committee to oversee the impartiality of our business, our auditor and the findings, and the decisions of certification managers.

2. Applicability / context

This policy applies to all staff employed or contracted by QPA and the Board of Directors.

QPA has adopted principles, policies and procedures (systems) designed to maintain the separation between the administration and assessment activities of QPA.

These systems ensure that the decision surrounding accreditation is made independently of the management and administration of QPA.

While the QPA Board of Directors takes full responsibility for the decisions relating to the granting, maintaining and withdrawing of certification, decisions regarding accreditation of practices are made independently of the management of QPA.

There shall be a strict separation from assessment and accreditation of practices through QPA and the provision of other services by QPA and by other related bodies.

To ensure that the activities of related bodies do not affect the confidentiality, objectivity or impartiality of certification, QPA shall not provide, or offer to provide, those services it accredits others to perform.

Under no circumstances will QPA provide consulting services to obtain or maintain general practice accreditation. Any development that QPA may undergo resulting in the provision of other products and services, such as services to design, implement or maintain quality systems shall only be pursued if the confidentiality, objectivity or impartiality of the QPA program is not compromised.

3. Responsibility

The Board of Directors and Managing Director are responsible for QPA's business performance.

The Managing Director will oversee the Impartiality and Audit Committee charter.

The Managing Director will report to the Impartiality and Audit Committee on an annual basis or more frequently if required.

The Impartiality and Audit Committee's authorized representative will develop an audit plan in support of this policy and the Managing Director, or his authorized delegate, will develop business systems in support of this policy.

All employees are responsible for their conduct at work. This policy and its related procedures apply to all employees, managers, committee members and directors of QPA.

QPA is committed to:

1. Taking action to respond to any threats to our impartiality arising from the actions of other persons, bodies or organisations
2. Offering our accreditation body representatives such reasonable access, cooperation and courtesy, without harassment, to enable monitoring of our compliance with the Accreditation Criteria
3. Not allowing commercial, financial or other pressures to compromise impartiality
4. Reporting any situation that may present employees or QPA with a conflict of interests
5. Disclosing any potential or actual conflict of interest before accepting or commencing any work
6. Not using employees/contractors for accreditation visits unless they demonstrate that they have no conflict of interests
7. Recording any actual or potential conflicts of interest
8. Evaluating our finances and sources of income and demonstrating to the Impartiality and Audit Committee and Board of Directors that commercial and financial matters do not compromise impartiality
9. Understanding how this policy effects our work environment
10. Reporting on any violations of this policy

4. Procedures

4.1 Identification of potential conflicts of interest

4.1.1 QPA and certification personnel are committed to the avoidance of potential situations regarding conflict of interest. This effort covers all potential sources of conflict of interests that are identified, whether they arise from within QPA or from the activities of other persons, bodies or organisations, such as contractors.

4.1.2 Threats to impartiality can be based on ownership, governance, management, personnel, shared resources, finances, contracts and marketing or other inducement for the referral of new clients.

4.1.3 Impartiality of finances and sources of income: QPA performs annual evaluations of its finances and sources of income. Financial risk analyses are conducted by independent third party

accounting firms, resulting in a Financial Risk Analysis Report.

- 4.1.4** The annual Financial Risk Analysis report is presented to the Impartiality and Audit Committee. The report must demonstrate to the Committee that QPA's finances are sound and that there are no commercial, financial or other pressures that may compromise its impartiality.
- 4.1.5** The Financial Risk Analysis report presented to the Impartiality and Audit Committee includes information regarding sales by customer, revenue by customer and general information about profitability and cash flow.
- 4.1.6** As with other aspects of impartiality, the Impartiality and Audit Committee understands its role in the financial review and their responsibility for questioning aspects of the report that may compromise impartiality.
- 4.1.7** Measures taken by QPA in preventing situations concerning conflict of interest include:
- Through training and notifications, ensuring that all certification personnel are aware of the potential of conflict of interest
 - Executing avoidance measures in procedures, training, and operating functions
 - Specific checks made in the surveyor team selection process
 - Investigation into the details of any situation that may be perceived as a potential conflict

4.2 Elimination or minimizing potential threats

- 4.2.1** Each existing employee or contractor, or new employee or contractor (at the time of employment), provides references in relation to their participation in outside consulting.
- 4.2.1.1** If outside consults have occurred, the review of the application determines what, if any, conflict might exist, and what actions are to be taken in the event potential conflicts exist.
- 4.2.2** All QPA employees and contractors sign a Confidentiality Statement and Code of Ethics when initially employed or contracted.
- 4.2.2.1** The Managing Director reviews the activities of the organisation and verifies that no conflicts exist due to any business relationships. This review is documented during the annual management review.
- 4.2.2.2** The Impartiality and Audit Committee includes within its activities a review of conflict avoidance and the impartiality of QPA operations.
- 4.2.3** QPA takes action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organisations.
- 4.2.4** Employees may be subject to disciplinary actions up to and including termination if impartiality requirements are not met.
- 4.2.5** Contractors are subject to actions up to and including cancellation of contracts and termination of all relationships with QPA if impartiality requirements are not met.
- 4.2.6** Other persons, bodies, and organisations not previously covered may be subject to appropriate

action, including legal action, in order to assure termination of any activity determined to compromise the integrity and impartiality of QPA's certification program.

4.2.7 Employees agree to decline any gifts, gratuities or payments (other than token) offered by any practice.

4.3 Committee for safeguarding impartiality

4.3.1 An Impartiality and Audit Committee has been established to provide independent review and oversight of quality management certification activities.

4.3.2 The role of the Impartiality and Audit Committee is to verify that certification activities are performed in an impartial manner without undue influences that might negatively impact the impartiality of services rendered.

4.3.3 The principle responsibilities of the Impartiality and Audit Committee include:

- Assistance in developing the policies relating to impartiality of its certification activities
- Counteract any tendency on the part of the Quality Systems to prevent the consistent objective provision of certification activities,
- Provide advice on matters affecting confidence in certification, including openness and public perception,
- Conduct a review, as least annually, of the impartiality of the audit, certification and decision making processes of QPA.

4.3.4 Other tasks or duties may be assigned to the Impartiality and Audit Committee provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

4.3.5 The Impartiality and Audit Committee includes representation of a balance of interests such that no single interest predominates. QPA employees and paid contractors are considered as a single interest and may not predominate the Impartiality and Audit Committee.

4.3.6 The Impartiality and Audit Committee will be made aware, as a part of its activities, that if QPA Board of Directors does not respect its advice; the Committee has the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders).

4.3.7 In taking independent action, the Committee shall respect the confidentiality requirements of clients and QPA.

4.3.8 Although the Committee cannot represent every interest, QPA will identify and invite key interests to consider committee membership. Such interests may include:

- QPA clients
- Customers whose management systems are certified
- Representatives of governmental regulatory bodies or other governmental agencies
- Representatives of non-governmental organisations, including consumer organisations.

4.4 Formal Rules for Operation

4.4.1 During its annual meeting, the Impartiality and Audit Committee will have access to all the information necessary to enable it to fulfill its functions. The meeting will include review of the impartiality of the audit, certification and decision making processes of QPA.

4.4.2 A QPA representative will act as chair for the meeting.

4.5 Impartiality and Audit Committee composition, terms of reference, duties, authorities, and competence

4.5.1 The composition, terms of reference, duties, authorities, competence of members and responsibilities of this committee are documented and authorized by the Managing Director.

4.5.2 The Committee will consist of a minimum of three members, including a representative from QPA available to provide any information requested by the committee in their performance of their duties and responsibilities.

4.5.3 The Committee discharges their responsibility by attending and participating in the committee meetings.

4.5.4 The Committee is authorised to review the overall operations of QPA relative to impartiality.

4.5.5 Competency characteristics of Impartiality and Audit Committee members are described in Table 1 of this procedure.

4.5.6 Specific Terms of Reference for the Impartiality and Audit Committee is described in Appendix E of this procedure.

Table 1 – Impartiality Committee Members’ Competencies

<i>Area of competence</i>	<i>Knowledge and skills</i>	<i>Evaluation criteria</i>	<i>Evaluation methods</i>
Personal attributes: ethical, open-minded, diplomatic, observant, perceptive	Ability to counteract any tendency on the part of QPA to allow considerations preventing consistent, objective provision of certification activities	Employment history	Interview Review of committee activities Feedback from committee members
Management system and reference documents	Knowledge of best practice policies, processes and procedures	Completion of the QPA Orientation Program Training	Interview Record of review
Participation in committee activities	Experience and involvement in other relevant businesses and committees	Attendance and participation	Review of committee activities
Applicable laws, regulations and other requirements	Ability to identify and understand the application of the relevant laws and standards related to the process	Employment history	Interview Record of board activities Feedback from board members

Appendix

Appendix A

QPA Certification Authority Guidelines for Awarding Certification

Appendix B

Confidentiality Statement and Code of Ethics

Appendix C

QPA Accreditation & Certification Impartiality Policy

Appendix D

QPA Statement of Ethical Principles

Appendix E

QPA Impartiality and Audit Committee Terms of Reference