

Stroma Certification Ltd

Impartiality Policy

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1.0 Introduction

This document details the specific actions undertaken by Stroma Certification to ensure impartiality of practice across the various certification schemes. This document is freely available to all certified members, EPBR member states, UKAS, industry stakeholders and members of the public.

1.1 Commitment

Stroma Certification has a top management commitment to the implementation of impartiality in our management system certification activities. This IPY1 - Impartiality Policy outlines the importance of impartiality in conducting our management system certification activities across our various certification schemes, and the management of conflicts of interest which will ensure the objectivity of these activities. Stroma Certifications top management will review and manage any residual risk identified to ensure a high level of impartiality is maintained.

The following procedures in our policy will ensure an impartial and competent certification process is undertaken for all applicants and members.

2.0 Strategy & Policy Development

All certified members will receive exactly the same terms of engagement and applicable fee structure, to ensure equality for all members.

3.0 Training, Invigilation & Examination

3.1 Training

To ensure that all training is delivered in a fair and impartial manner the following practices are undertaken:

- All training is delivered by persons who are occupationally competent in the area of certification being delivered. Trainers must be appropriately qualified and/or have relevant experience in that particular field.
- Where a conflict of interest occurs between a trainer and a candidate(s), the trainer must immediately inform Stroma Certification. All actions undertaken by Stroma Certification to ensure that impartiality is maintained must be recorded.
- Where examinations are undertaken by a third party training organisation, Stroma Certification requires proof that the organisation has a similar policy in place with procedures to deal with the above points appropriately.

3.2 Examination

To ensure that all examinations produced by Stroma Certification are fair and impartial, the following practices are undertaken:

- The examination format is such that at a minimum of 3 individual examination papers are available for random selection by an impartial party.
- All examinations and accompanying documents are printed by an impartial person who has no involvement in the candidates training or the invigilation of the examination.
- The examination papers and supporting documents are sealed in an envelope for secure transfer to the location of the examination.
- The examination will be audited every three months to ensure the validity of the process. (For specific details see Section 7.0 Audits Quality Checks).

3.3 Invigilation

To ensure that the invigilation of examinations is undertaken in a fair and impartial manner, the following practices are undertaken:

- Where a conflict of interest is identified between an invigilator and a candidate(s), the invigilator must immediately inform Stroma Certification of the issue. All actions taken by Stroma Certification with regard to potential/actual conflicts of interest must be recorded.
- All perceived non-conformities, including late arrivals, misconduct, or emergency situations must be recorded by the invigilation staff, and submitted with the examination documentation to Stroma Certification for review. All actions taken by Stroma Certification to address issues of non-conformity must be recorded.

- Where examinations are undertaken by a third party organisation, Stroma Certification requires proof that the organisation has a policy in place to ensure that the above points are dealt with appropriately.

3.4 Examination Marking

To ensure that all examinations are marked in a fair and impartial manner the following practices are undertaken:

- All examinations are marked by an impartial person, i.e. the examiner has had no involvement in the candidates training, or the invigilation of the examination.
- Examination papers are marked in the order in which they are received.
- Where a conflict of interest is identified between the examiner and a candidate(s), the examiner must immediately inform Stroma Certification of the issue, who will risk assess the situation. All actions taken by Stroma Certification with regard to potential/actual conflicts of interest must be recorded.
- Where examinations are undertaken by a third party training organisation, Stroma Certification requires proof that the organisation has a policy in place to ensure that the above safeguards are implemented.

4.0 APEL Assessments (EPBD only)

To ensure that candidates applying for certification under the APEL process are assessed in an impartial manner, the following practices are undertaken:

- APEL applications and assessments are marked in the order in which they are received.
- Where a conflict of interest occurs between an APEL assessor and a candidate(s), the APEL assessor must immediately inform the technical manager who will risk assess the situation. All actions taken by Stroma Certification with regard to potential/actual conflicts of interest must be recorded.

5.0 Portfolio Assessment and Verification (EPBD only)

To ensure that all candidates applying for certification (who are required to submit a portfolio as part of the examination process) are assessed in an impartial manner, the following practices are undertaken:

- All assessment and verification of portfolios is undertaken by an impartial person. The assessor of the portfolio (at all levels of assessment and verification) will have had no involvement in the candidates training, or invigilation of the examination.
- All portfolios are assessed in the order in which they are received.
- Where a conflict of interest is identified between a portfolio assessor/verifier and a candidate(s), the assessor/verifier is obliged to immediately inform the Qualification Assessment Quality Manager who will risk assess the situation. All actions taken by Stroma Certification with regard to potential/actual conflicts of interest must be recorded.

6.0 Certification of an Applicant

To ensure that candidates applying for certification are treated in an impartial manner, the following practices are undertaken:

- All decisions on certification are undertaken by an appropriately impartial person who has no involvement in the candidates training, examination invigilation, or the marking of portfolios or examinations, or other conformity assessments.
- Certification is not conditional upon the number of lodgements certificates or installation that may be, or have already been issued or undertaken by the applicant under different certification schemes.
- Certification is not conditional upon any financial or other limiting condition, such as membership of an association or group;
- Where an application is rejected, procedures set out within the Escalation Policy will be followed.
- Applications for certification will be processed in the order in which they are received.
- In line with ISO/ IEC 17065:2012 no senior executive or other member of staff is to succumb to any pressure, whether commercial, financial or other, which might influence the results of the certification process.
- Passing the CSH exam is not conditional upon undertaking any specific service providers training.
- Undertaking a combination of training and examination for CSH from a single service provider should not lead to certification being considered simpler, easier or less expensive or result in the same.

7.0 Internal Audits

To ensure that Stroma Certification operates in an impartial manner, internal quarterly audits are conducted a member of the Quality Management (QM) team.

The outcome of internal audits will be reported to Stroma Certifications senior management and discussed with external bodies such as UKAS, DCLG, Environment Agency and other industry stakeholders.

8.0 QA Assessors Guidance

8.1 Conflicts of Interest

QA assessors must declare any potential conflict of interest when carrying out a QA check. It may be necessary to pass the QA check onto another Stroma Certification QA assessor without the same conflict of interest.

A conflict of interest would be deemed as a situation where the QA assessor might be reasonably expected to materially influence their judgement of an assessment or installation based on the relationship the QA assessor has with the scheme member.

A QA assessor should consider the following circumstances as a conflict of interest. When providing QA for an assessment / installation produced by:

- Themselves
- Family member
- A colleague or associate

QA assessors must adhere to the guidance provided by individual schemes. The guidelines are available to all QA assessors in *N:\Approved Documents*. All QA assessors must sign the 'Conflict of Interest Declaration Form', by which confirming they will adhere to the conflict of interest requirements. A copy of this form can be located in the Stroma Certification QMS.

8.2 Prior Warning to Assessors

QA assessors must not give prior warning to individual scheme member or their employer, whether directly or indirectly, to alert them of the intent to audit an assessment or Installation, enabling the scheme member to amend the assessment or installation respectively prior to the QA.

If a QA assessor has evidence that a scheme member they have audited is involved in activities believed to be fraudulent, they must declare it to the relevant Scheme Manager.

If a QA assessor feels under pressure from a scheme to pass a QA Audit, or to certify an individual or organisation to a scheme that they do not believe to be competent, they should contact a senior member of staff.

9.0 Complaints

For more information on maintaining the impartiality of complaints procedures, please review the following documentation available online in the 'Members Pack' and in the QMS:

- Complaints and Appeals Policy.

10.0 Stroma Certification and other Stroma Divisions

To ensure that Stroma Certification operates in a fair and impartial manner to all scheme members, the following measures are implemented to ensure impartiality between Stroma Certification and other Divisions of Stroma:

- Stroma Certification operates as an independent company in its own right, separate from all other Stroma Divisions.
- Risk Analysis Reports are conducted on the relationship between Stroma Certification and all other Stroma Divisions by way of Related Body Analysis in order to identify and mitigate any potential risks.

GSD:

[N:\1. Stroma Certification QMS\1. QMS - QA Manual\QMS - Current\Section 1 - General Scheme Documents\8 - QMS Records\8. Risk Analysis](#)

Code:

[N:\1. Stroma Certification QMS\1. QMS - QA Manual\QMS - Current\Section 4 - CSH - 170247 - Scheme Records\1. Risk Analysis Reports](#)

- Stroma Certification maintains independent financial status from all other Stroma Divisions.
- Stroma Certification maintains impartiality and equity of membership by ensuring that all scheme members (including those of other Stroma divisions) are subject to the exact same treatment and support as outlined in all organisational policies and procedures, without exception
- Stroma Certification maintains separate staff records and an independent recruitment process.
- Stroma Certification operates in independent office areas, separate from all other divisions.
- Stroma Certification ensures that all scheme members (including other Stroma divisions) are entitled to the same level of technical support as detailed in the Support Policy.
- Stroma Certification maintains independence and security of information by ensuring that all electronic data and records for Stroma Certification are stored on a secure separate server; the 'N' drive. This information can only be accessed by authorised personnel of Stroma Certification.
- The IT manager of Stroma Certification holds direct responsibility for connecting authorised personnel to the server. Permission for access can only be gained via the Quality Manager.

11.0 General Notes

Stroma Certification will act in an independent and impartial manner towards all scheme members, clients and interested parties as follows:

1. All policies and procedures under which Stroma Certification operate are administered in a non-discriminatory manner. Procedures are not used to impede or inhibit access by certified members.
2. Applications are processed in the order that they are received.
3. Where a candidate or member of the public has a complaint regarding the impartiality of Stroma Certification, they may formally issue a complaint in accordance with the following documentation (as mentioned above in *Section 9.0*):
 - Complaints Procedure
4. All services offered by Stroma Certification are accessible to all applicants/assessors. Access is not conditional upon the size of company or membership status.
5. It is not a requirement or an exclusive pre-requisite for candidates to complete the Stroma Certification training programme in order to become a member of the scheme. However, competence must be proven to be of an equal standard to that provided by the Stroma Certification Training Programme.
6. Stroma Certification personnel will not serve as an examiner of a specific candidate they have trained for a period of 2 years from the date of the conclusion of the training activities.