Stroma Certification Ltd

Impartiality Policy

Table of Contents

1   Introduction

This document details the specific actions undertaken by Stroma Certification to ensure impartiality of practice across all the certification schemes operated by Stroma Certification. This document also applies to ensuring impartiality of practise across training and examinations provided. This document is freely available to all certified members, examination and training candidates, the central government of the United Kingdom, and it's devolved administrations in Wales, Scotland and Northern Ireland, 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 personnel, product and management system certification activities. This IPY1 - Impartiality Policy outlines the importance of impartiality in conducting our personnel, product and 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 Certification's 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   Strategy & Policy Development

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

3   Training, Invigilation & Examination

3.1   Training

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

1. 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.
2. 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.
3. 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:

1. The examination format is such that at a minimum of 3 individual examination papers are available for random selection in an impartial manner, e.g., random selection.
2. All examinations and accompanying documents are printed by an impartial person who is not involved in the candidates training or the invigilation of the examination.
3. Where hard copy examination papers and supporting documents are provided, these will be sealed in an envelope for secure transfer to the location of the examination.
4. The examination will be audited every quarter to ensure the validity of the process. The specific OPI document for the certification scheme should the consulted for specific requirements.
5. Where a Stroma Certification employee undertakes an examination written by the company, a risk assessment will be undertaken to ensure the impartiality of the outcome of the examination.

3.3   Invigilation

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

1. 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 regards to potential/ actual conflicts of interest must be recorded.

2. 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.
3. 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:

1. All examinations are marked by an impartial person, i.e., the examiner was not involved in the candidates training, or the invigilation of the examination.
2. Examination papers are marked in the order in which they are received.
3. 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 undertake a risk assessment for the situation. All actions taken by Stroma Certification with regard to potential/ actual conflicts of interest must be recorded.
4. 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.
5. Where a Stroma Certification employee undertakes an examination written by the company, a risk assessment will be undertaken to ensure the impartiality off the outcome of the examination.

4 Portfolio Assessment and Verification

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:

1. 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 (as applicable).
2. All portfolios are assessed in the order in which they are received.
3. 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 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.

5 Certification of an Applicant

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

1. All decisions on certification are undertaken by an appropriately impartial person who was not involved in the candidates training, examination, invigilation, the marking of portfolios, examinations, or other conformity assessments.
2. Certification is not conditional upon the number of lodgements certificates that may be or have already been issued or undertaken by the applicant under different certification schemes.
3. Certification is not conditional upon any financial or other limiting condition, such as membership of an association or group.
4. Where an application is rejected, procedures set out within the CAP1 - Complaints and Appeals Policy will be followed.
5. Applications for certification will be processed in the order in which they are received.
6. 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.
7. Passing the CSH exam is not conditional upon undertaking any specific service providers training.
8. 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.

6   Internal Audits

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

The outcome of internal audits will be reported to Stroma Certification's senior management and discussed with external parties such as the appropriate representatives of central government of the United Kingdom, and it's devolved administrations in Wales, Scotland and Northern Ireland, UKAS and other industry stakeholders.

7   QA Assessors Guidance

7.1   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:

- N:\1. Stroma Certification QMS\Section 9 - External Documents

All QA assessors must sign the CID1 - Conflict of Interest Declaration, 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.

7.2   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, enabling the scheme member to amend the assessment 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.

8   Complaints

For more information on maintaining the impartiality of complaints procedures, please review the following noted document, available for all stakeholders on the Stroma Certification website, under the 'Members' section, in the relevant scheme 'Members Pack' for all Scheme Members and in the QMS for internal members of staff:

1. CAP1 - Complaints and Appeals Policy.

9   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:

1. Stroma Certification operates as an independent order company in its own right, separate from all other Stroma Divisions.
2. Risk Analysis Reports are conducted on the relationship between Stroma Certification and all other Stroma Divisions by way of Related Body Analysis to identify and mitigate any potential risks:
3. Stroma Certification maintains independent financial status from all other Stroma Divisions.
4. 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.
5. Stroma Certification maintains separate staff records and an independent recruitment process.
6. Stroma Certification operates in independent office areas, separate from all other divisions.
7. Stroma Certification ensures that all scheme members (including other Stroma divisions) are entitled to the same level of technical support as detailed in the SUP1 - Support Policy.
8. 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 and the 'N' drive. This information can only be accessed by authorised personnel of Stroma Certification.
9. The Stroma Head of IT Services holds direct responsibility for connecting authorised personnel to the server. Permission for access can only be gained via the Managing Director, Technical Manager or Quality Manager.

10   Stroma Certification Ltd and Phenna Group

Stroma Certification Ltd is part of the Phenna Group. Phenna Group has several other organisations within its portfolio and therefore impartiality and independence must be a priority.

To ensure clear lines of impartiality and independence are in place between Stroma Certification and Phenna Group interested parties relating to certification activities, the following controls are in place:

1. Stroma Certification operates as an independent company in its own right, separate from the Phenna Group and their other interested parties.
   a.   See Section 10.1 for ongoing development of this status.
2. Phenna Groups CEO and CFO may attend Stroma Certification Board Meetings.
3. Stroma Certification's existing management structure remains in place and will otherwise continue to make all operational/day-to-day decisions.
4. The Phenna Groups CEO and CFO are not permitted to discuss or share any confidential information relating to Stroma Certification Ltd with any of their other parties unless required by regulation, law or for reporting requirements.
5. Stroma Certification maintains independent financial status from Phenna Group and their interested parties. Financial performance will be discussed with their CEO and CFO.
6. Stroma Certification maintains separate staff records and an independent recruitment process.
7. Stroma Certification maintains the independence and security of its information by ensuring that all electronic data and records for Stroma Certification Ltd are stored on a secure separate server.
8. Phenna Group CEO and CFO will be given access to information they require to understand the business's performance only, this will not include detailed information concerning specific projects or clients that is not relevant to performance reporting. Any detailed information shall only be shared under authorisation from the Stroma Certification's Managing Director.
9. No access will be given to the Phenna Group and their interested parties to the Stroma Certification CRM database or any other IT platforms unless authorised by the Stroma Certification Managing Director.

The relationship between Stroma Certification Ltd, Phenna Group and their interested parties will be kept under review and assessed no less than annually though the Risk Assessment procedures. Any new threats to impartiality and/ or independence are to be declared and discussed during monthly Board Meetings. Where any issues of impartiality or independence are identified, the appropriate remedial action will be undertaken and where policy notes are revised these shall be shared with relevant external bodies.

10.1   Merger with Elmhurst Energy

On the 6th September 2022, Phenna Group announced the merger of Stroma Certification and Elmhurst Energy. The two companies operate within the same certification industry and are owed by the Phenna Group. This decision will result in the largest certification company operating in this sector, under the Elmhurst Energy brand name.

Items 1-9 listed above will remain valid in relation to Phenna Group and the companies they own with the exception of Elmhurst Energy whom require access as they merger with Stroma Certification. Members will remain under the policies and procedures held by Stroma Certification until such time as the specific departments transfer under the Elmhurst Brand, at which point they will transfer to the Elmhurst policies and procedures.

Should a Member have reason to lodge a complaint or appeal against any practise undertaken during the merger, this can be actioned through either company's complaints and appeals procedures.

The merger will be kept under review and assessed no less than annually though the Risk Assessment procedures. Any new threats to impartiality and/ or independence are to be declared and discussed during monthly Board Meetings. Where any issues of impartiality or independence are identified, the appropriate remedial action will be undertaken and where policy notes are revised these shall be shared with relevant external bodies.

11   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:

   • CAP1 - Complaints and Appeals Policy

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 activates.