PUBLISHED STATEMENT · SOURCE: PY-03 + QP-22

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PY-03 + QP-22

Impartiality Policy.

SOURCE DOCUMENTS	PY-03 + QP-22	DOCUMENT OWNER	QSI CERTIFICATION MANAGEMENT
ISSUE + REVISION	STATED ON THE CONTROLLED ISSUE	APPROVED COPY	FROM QSI ON REQUEST

THIS PAGE IS THE PUBLISHED STATEMENT OF PY-03, IMPARTIALITY POLICY, AND QP-22, IMPARTIALITY AND CONFLICT OF INTEREST, CURRENT REVISIONS.

CL. 01 Purpose and commitment

QSI Cert is the legal entity responsible for certification activities. Its directors, managers, staff and subcontractors understand that the value of every certificate rests on impartiality. In all dealings with clients and potential clients, everyone involved in certification is required to be, and to remain, impartial.

QSI recognises that the source of revenue for a certification body is the client paying for certification, and that this is in itself a potential threat to impartiality. QSI is therefore a self-financed independent organisation operating the controls described in this document to ensure that impartiality is retained.

Certification decisions are based on objective evidence of conformity or nonconformity. They are not influenced by other interests or by other parties. Every certificate is issued only after review by an authorised, competent member of the management team who was not involved in the audit, so that no single interest can predominate.

CL. 02 Services QSI does not provide

Certain services are incompatible with independent certification. QSI does not offer them and has never offered them.

- QSI does not provide management system consultancy of any kind, to companies or to individuals.
- QSI does not provide internal audit services to its certified clients.
- QSI does not own or hold any interest, financial or otherwise, in any other company offering certification or management system consultancy.
- QSI does not outsource audits or certification decisions to management system consultancy organisations.
- QSI does not link its marketing to the activities of any management system consultancy, and takes action if any such link is identified.
- QSI does not provide company-specific training in implementing a particular standard. Training offered by QSI is general in nature and open to any company or individual.
- QSI staff and subcontractors must never suggest or imply that certification would be simpler, easier or less expensive if particular consultancy or training services were used.

CL. 03 Threats to impartiality

Every identified conflict of interest, whether actual, potential or perceived, is assessed against five recognised threat types and rated low, medium or high before work is assigned.

- Self-interest: a person or body acting in its own interest, including any financial or personal stake in a favourable audit outcome.
- Self-review: a person reviewing or auditing work they performed or influenced themselves.
- Familiarity: a person becoming too familiar with or too trusting of a client, instead of seeking audit evidence.
- Intimidation: a person acting under open or hidden pressure, including a perceived threat of being replaced or reported.
- Advocacy: a person promoting a client’s interests rather than assessing them objectively.

CL. 04 Eliminate or mitigate

High-risk conflicts are eliminated: the person is removed from the audit, the decision, or the assignment entirely. Lower-risk conflicts may be managed through documented safeguards, applied in a defined hierarchy from strongest to weakest: complete segregation within the organisational structure, independent dual review, enhanced monitoring and documentation, and disclosed transparency measures.

Elimination and the stronger safeguards require Impartiality Committee approval. Every identified conflict, its risk rating, the decision taken and the follow-up are recorded in the impartiality risk register, which is reviewed quarterly by the committee and is available to accreditation body assessors.

CL. 05 The Impartiality Committee

An independent Impartiality Committee oversees conflicts of interest across the certification process. Its decisions on conflicts of interest are final and cannot be overridden by management.

- The committee comprises a minimum of three independent members with no employment relationship with QSI, no financial interest in certification outcomes and no family relationship with QSI decision makers or auditors.
- Members bring senior certification body experience and working knowledge of the certified standards. They serve fixed terms and cannot be removed because of decisions or recommendations they make.
- Only independent members vote. The Managing Director may attend but has no vote, and management cannot impose agenda items or direct decisions.
- The committee has unrestricted access to personnel files, audit records, certification decisions and complaints and appeals.
- It conducts a comprehensive annual review of impartiality performance, covering conflicts identified, the effectiveness of safeguards, auditor rotation and tenure, confidential personnel feedback and any client complaints touching impartiality.
- Any proposed relationship between QSI and another organisation is risk assessed by the committee before it is formalised, and existing relationships are reassessed regularly.

CL. 06 Conflict of interest rules for personnel

Everyone involved in certification, including subcontracted auditors, sector specialists and committee members, is bound by declared and enforced conflict of interest rules, backed by signed confidentiality and non-disclosure agreements and annual training.

- Conflict of interest declarations are mandatory at recruitment, before every audit assignment, before every certification decision, and annually for all personnel.
- Personnel must document current and past relationships with client organisations. QSI does not assign anyone to an audit where a past relationship existed within the previous two years.
- Audit and certification staff who have assisted an organisation through consultancy or training, or who hold any financial or commercial interest in it, are barred from its audit and certification for a minimum of two years.
- No auditor may audit an organisation where a family member or close relative holds a decision-making position.
- No auditor may market QSI services to a client and also audit that client.
- No auditor may carry out financial transactions with clients or consultants, or accept gifts from them above a nominal value of SAR 100.
- Subcontracted staff cannot offer consultancy or training to a QSI client they have been assigned to audit, during or after the assignment.
- Auditors and others involved in the certification process are never placed under pressure, and are never influenced, to reach a particular audit conclusion.

CL. 07 Separation of audit and decision

The certification decision is structurally separated from the audit. Decisions to grant, maintain, renew, extend, reduce, suspend or withdraw certification are made and signed by a competent decision maker who was not responsible for the audit and was not a member of the audit team.

The Managing Director does not serve as the certification decision maker for clients. Where a designated decision maker has a disclosed conflict in a specific case, an independent person is appointed to decide instead. Technical review of audit findings is likewise performed by a person independent of the audit team.

QSI retains full control of all decision making regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification. No certification decision is outsourced.

CL. 08 Referral fees and commercial controls

QSI does not pay referral fees to consultancy organisations. A referral commission of any other kind is permitted only where its terms are clearly established, a risk assessment confirms it poses no unacceptable threat to impartiality, and the payment is documented, recorded and traceable. A commission never affects the outcome of an audit, and no auditor is assigned to audit a client they were involved in referring.

CL. 09 If impartiality is compromised

A suspected breach of impartiality, including an undisclosed conflict, a deviation from agreed safeguards or inappropriate pressure, triggers a defined response with the Impartiality Committee as the final authority.

IMMEDIATE ACTION	**AFFECTED AUDIT HELD, WITHIN 24 HOURS**
INVESTIGATION	**COMMITTEE LED, WITHIN 5 WORKING DAYS**
REMEDIATION	**RE-AUDIT OR RE-DECISION AS DIRECTED**
CLIENT NOTIFIED	**ON COMPLETION OF INVESTIGATION**
ACCREDITATION BODY	**NOTIFIED WITHIN 10 WORKING DAYS**

Where audit independence was compromised, the audit is repeated by an independent team. Where a certification decision was compromised, the certificate is suspended or withdrawn pending a fresh decision by an independent decision maker. The affected client is notified openly, and root cause analysis follows every closure.

END OF STATEMENT · SOURCE **PY-03 + QP-22**

This page is the published statement of PY-03 + QP-22, current revision, provided for clients and certificate users. The approved issue held in the QSI document control system carries the effective date, revision record and approval details, and governs any specific certificate, complaint, appeal or use-of-mark decision.