



PSA

Subject: Conduct of the Mechanism to Safeguard Impartiality

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ISO 31010

ISO 19476

ISO 31000

ISO guide 73

PSA Impartiality Philosophy

Managing impartiality effectively is critical to delivering high quality certification services that our clients, regulators and the community can rely on. Impartiality is the “presence of objectivity”.

If we do not act impartially, we cannot provide confidence in the certification process to our clients. We must understand and manage threats to impartiality to support our success as a business.

At PSA we will ensure that:

Impartiality is integral to all aspects of the certification process

Commercial, financial or other pressures do not influence certification decisions

Threats to impartiality are identified and managed

We consult with appropriate interested parties regarding matters affecting impartiality.

Impartiality Principles

Impartiality threats can arise from a number of sources:

Certification is a fee for service product therefore undue influence could be exerted by a client

Providing consultancy services to clients that then require certification services

Trust and familiarity in person(s) within the certification process

Intimidation, bribery or other behavior by clients (real or perceived) designed to influence a certification decision.

To this end PSA is committed to ensuring that:

Risks to impartiality are identified and managed

Audit reports are subjected to an independent review



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Employees sign a confidentially agreement

There is a minimum of a two-year gap between the provision of any consulting work and certification work with a client

There is a minimum of a two year gap between an auditor providing consulting work to a client and performing certification audits for that client

Personnel report all threats, offers of bribery or potential conflicts of interest to management

Internal audits of a certified client’s management systems are not undertaken, unless 2 years gap is between performing internal audits and certification audits

Audits will not be outsourced to a management system consultancy organization

Auditors are rotated to ensure they do not audit the same client for 4 consecutive years, if specific scheme require this rotation

Services will be accessible to all applicants whose activities fall within the scope of our operations. Access will not be conditional upon the size of the client or membership of any association or group, nor will it be conditional upon the number of certifications already issued.

No commercial or financial pressures will be allowed

Roles and Responsibilities (in terms of impartiality)

PSA applies the Three Lines of Defense accountability framework for management of impartiality (Figure 1).



Figure 1– Three Lines of Defense Model

Board

The Board is responsible for deciding on the nature and extent of risks that PSA is prepared to take to meet its



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objectives, and this is articulated in the Statement.

The Board is also responsible for overseeing the effectiveness of risk management in PSA. The Board has established a impartiality Committee to assist it in discharging these responsibilities.

Steering Committee

The role of the **Steering** Committee is set out in its page in our website. Key responsibilities in relation Impartiality threats include:

Review the outputs from the impartiality committee meetings

Review and determine the effectiveness of existing controls in managing impartiality threats

Determine the suitability of the management system to effectively manage impartiality risks

Approving changes to the impartiality policy and framework

Impartiality Committee

The role of the Impartiality Committee is set out in its page in our website. Key responsibilities include:

Reviewing the effectiveness of the controls to manage threats to impartiality

Recommending improvements in how to manage threats to impartiality

Reporting incidents of threats to impartiality

Developing and maintaining a framework for managing threats to impartiality, including policies, processes and tools

Supporting business areas undertake effective management of impartiality threats through advice, education, training and technical support

Coordinating and presenting reports on threats to impartiality for CEO

Assessing the effectiveness of controls to manage threats to impartiality and developing plans to continuously improve.

Approving material changes to the framework for risk management, including policies, processes and controls

Reviewing the Statement at least annually and recommending changes to the Board for approval, and

Reviewing reports from CEO in order to understand the key risks faced by PSA and how they are being managed.

Internal Audit

PM is responsible for independently assessing the effectiveness of the overall risk management framework as part of the risk based audit plan. This includes assessing the design and operation of controls to manage risks in business areas and functions.



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Internal audits are also performed to review compliance to accreditation rules; these are overseen by the Scheme Owners Policy.

CEO

The CEO are responsible for:

Implementing the framework for risk management in their business area and considering risk in every business decision and every business process

Operating within the Risk Appetite Statement set by the Board and taking actions where this is not the case

Monitoring the leading PSA Risks and the leading risks in their business area

Establishing appropriate policies, procedures and controls to manage specific risks for which they have accountability and monitoring their effectiveness.

Management are responsible for:

Applying the identified controls for managing threats to impartiality in their business areas

Monitoring the correct functioning and applicability of controls

Participating in the threats to impartiality reporting process.

Employees

Every PSA employee is responsible for:

Complying with policies and procedures established by PSA to manage threats to impartiality risks

Identifying and reporting impartiality risks

Reporting incidents involving risks to impartiality.

Administration of this Policy

This policy will be reviewed annually by board

The Risk Committee is responsible for approving this policy.

Related Documents

[PSA Privacy Policies](#)

[PSA Impartiality Policy](#)

[CONFLICT OF INTEREST DISCLOSURE FORM](#)



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The certification body and any part of the same legal entity and entities under its organizational control (see 7.6.4) shall not:

- a) be the designer, manufacturer, installer, distributor or maintainer of the certified product;
- b) be the designer, implementer, operator or maintainer of the certified process;
- c) be the designer, implementer, provider or maintainer of the certified service;
- d) offer or provide consultancy to its clients;
- e) offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.

NOTE 1 This does not preclude the following:

the possibility of exchange of information (e.g. explanations of findings or clarifying requirements) between the certification body and its clients;

the use, installing and maintaining of certified products which are necessary for the operations of the certification body.

NOTE 2 "Management system consultancy" is defined in ISO/IEC definition