

OneCert Procedure Manual

OP-01

Management of Impartiality

Purpose: To determine all threats to impartiality at all level of certification process.

Scope: To control/ prevent the threats to impartiality at all level of certification process.

Responsibility: Impartiality committee, relevant staff

Procedure:

A. COMMITTEE:

1. Impartiality committee consists experts from various interests that consists followings:
 - a. Chief Executive Officer, OneCert International
 - b. Managing Director/ Alternate Director OneCert International
 - c. Education Sector
 - d. A legal expert.
 - e. Regulatory body/ may be a retired person.
 - f. Production sector (Food Manufacturing company/Agriculture sector)
 - g. OneCert International Certified Client

Person responsible for the provision of adequate resources for certification activities:

1. *Chief Executive Officer, OneCert International (primary)*
2. *Director (secondary)*

2. **Impartiality Committee Minutes of Meeting (MOM):**
 - a. **Agenda/Inputs for Minutes of Meeting (MOM) covers:**
 - Reviewing the policies & their effectiveness relating to the impartiality of its certification activities
 - Results of risk analysis for impartiality & their mitigation measures
 - Review of finances and sources of income; to evaluate that on an ongoing basis, commercial, financial, or other pressures do not compromise its impartiality
 - Review of matters affecting confidence in certification, including openness and public perception
 - Review of the impartiality of the audit, certification, and decision-making processes of OneCert International
 - Follow-up actions of previous MOM's

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- Changes affecting the Management of Impartiality

A record of each meeting will be kept by a designated note-taker. Note taking will revolve to each member of the committee/group.

- b. **Frequency:** Once in a year

- c. **Rights & duties of the Impartiality Committee:**

- To access all information necessary to enable it to fulfill its function; for this purpose, regular information on impartiality & related issues (like financial status, details of complaints/appeals & complaint/ appeal handling etc.) is provided to committee members.
- If OneCert International does not respect the advice of this committee, the committee can take an independent action, e.g., informing authorities, accreditation bodies, stakeholders etc. in taking independent action, committees must respect the confidentiality requirements relating to OneCert International & its applicant/ certified operator.
- Monitoring appeals and Complaints, if required.

- d. **Quorum of Impartiality committee:**

At least 4 members from the impartiality committee shall be present (video conferencing is also considered as presence) while minutes of the meeting for impartiality in order to review & take important decisions on impartiality policy, procedures & their implementation.

(Here Chief Executive Officer and Director of OneCert International are considered as a single identity)

- e. **Consent by Impartiality committees:**

Based on the number of voting, votes of at least two-thirds of the members present will be taken as consent.

B. To ensure that impartiality is both maintained and can be demonstrated:

MANAGEMENT OF IMPARTIALITY:

1. OneCert International considers following threats to impartiality:

- a. Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
- b. Self-review threats: threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of an applicant to whom the certification body provided management systems consultancy would be a self-review threat.
- c. Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.
- d. Intimidation threats: Threats that arises from a person or body having a perception of being coerced openly or secretively, such as a threat to be replaced or reported to a supervisor.

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Following principals are maintained:

- a. OneCert International Certificates are only issued after review by an independent authorized and competent member of the management team to ensure that no interest shall predominate
- b. OneCert International does not offer (and has never offered) any internal audit service to companies or individuals.
- c. OneCert International does not offer (and has never offered) management system consultancy or any other form of consultancy, including ORGANIC, NPOP, or any other equivalent management system, to companies or individuals.
- d. OneCert International services have not any interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system consultancy. If it is known that any organization had linked its activities with OneCert International services, action will be taken to rectify the same.
- e. OneCert International does not have (and will not form) any relationships with companies who offer consultancy, internal audit services or other services that can be construed as having an impact on the certification services provided by OneCert International. Any proposed relationship between OneCert International and any other company will undergo a risk assessment by the Committee for Impartiality prior to that relationship being formalized.
- f. Any current relationships with companies, organizations and individuals will be risk assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the certification process. The risk assessment will be undertaken by the Committee for Impartiality.
- g. Individuals employed by or otherwise contracted to OneCert International are required to document and record their current and past relationships with all companies. Any situation past or present which may present a potential conflict of interest is required by OneCert International to be declared. OneCert International will use the information to identify any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest. The risk assessment will be undertaken by the Committee for Impartiality.
- h. Where any past relationship has existed, OneCert International will not allocate a member of staff or sub-contractor to a management system audit. Exceptionally and at the discretion of the Directors or Chief Executive Officer an individual or sub-contractor may be allocated to a management system audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- i. The risk assessment will be reviewed by the Committee for Impartiality.
- j. OneCert International services have not any interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system consultancy. If it is known that any person or organization is making inappropriate claims stating or implying that certification would be simpler, easier, faster, or less expensive, than that person or organization will be warned for not doing so & if required, legal action will be taken.

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- k. All employees will be reviewed at least annually to ensure that they remain impartial when conducting audits.
- l. Auditors and others involved in the certification process are not and will not be put under any pressure (e.g. targets to increase clientele, any financial pressure etc.) and will not be influenced in any way to come to a particular conclusion regarding the result of an audit.
- m. OneCert International retains authority of certification decisions.
- n. If auditor has delivered any Management System training, including Organic, NPOP, etc., or any other training to an organization, he or she cannot be involved in certification process of that organization for next six months from the date of training.
- o. To avoid familiarity threat, auditors are reshuffled at regular time frames, i.e. an auditor cannot audit same organization for more than 2 years or two audits.
- p. OneCert International does not pay any commissions or does not give any targets to anybody, for example any staff, applicant/ certified operator, marketing agencies, consultants etc.

2. OneCert International requires personnel; internal and external; to reveal any situation known to them that may present them or the certification body with a conflict of interests. This is done as follows:

- a. Policy is made known to them while appointment
- b. If required, investigation is done by our contacts in industries.
- c. While recruitment, details regarding the organizations that employ them or any projects in which they have involve previously will be taken in a prescribed format for resume or log sheets.
- d. Before audit, auditor, reviewer, technical expert or any external expert (including auditor, reviewer or technical expert) will have to give details about non conflict of interest & make a commitment for it by signing conflict of interest form.
- e. Before audit, audit team members are selected & appointed as per the procedure
- f. After audit, the auditor feedback form is taken by auditee.
- g. Verbal feedback from Co-auditors (audit team members) is also taken

Apart from above requirements, all employees of OneCert International, permanent or empanelled, have to sign OneCert conflict of interest declaration (OCI-112,) Confidentiality form (OCI-113), Annual Information Form (OCI-114) while appointment & annually.

OneCert International use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and does not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interests.

3. Also, OneCert International has identified, analyzed & documented the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationship in the risk analysis chart.

Note: All certification activities are completed in a planned manner the complete procedure is provided in 'audit procedure' & 'certification procedure'.