

POL.010 Conflict of Interest, Impartiality

1. Purpose and Scope

This procedure defines the system used by the DAA Group for the management of perceived or actual conflicts of interest to ensure impartiality.

2. Conflict of Interest

- 2.1 Being impartial, or being perceived to be impartial, is necessary for the DAA Group to deliver certification that provides confidence.
- 2.2 To obtain and maintain confidence, it is essential that the DAA Group's decisions be based on objective evidence of conformity (or non-conformity) obtained by the DAA Group, and that its decisions are not influenced by other interests or by other parties.
- 2.3 The DAA Group Directors understand the importance of and are committed to impartiality in our certification activities.
- 2.4 The DAA Group directors have strong values that are required to be met by all contractors and employees. These values include professionalism, passion, partnership, integrity, innovation and independence.
- 2.5 Conflicts of interest are a threat to impartiality¹. If a relationship creates a threat to impartiality, the DAA Group shall document and be able to demonstrate how we eliminate or minimize such a threat. This information shall be made available to the DAA Group Impartiality Committee.²
- 2.6 Where a relationship poses a threat to impartiality, then certification shall not be provided.
- 2.7 The DAA Group shall not provide management systems consultancy, internal audits, or outsourced internal audits.
- 2.8 Auditors or others employed or contracted by the DAA Group who have provided management systems consultancy shall not be used by the DAA Group to take part in an audit or any other certification activity if they have been involved in management system consultancy towards the client within two years following the end of consultancy.
- 2.9 Auditors or other employees shall reveal any situation known to them that may present them or the DAA Group with any conflict of interest. This information shall be recorded in BORIS. A Declaration of Interest shall be signed by each auditor prior to each and every event. This shall be filed in the client file.

3. Impartiality Committee

- 3.1 The DAA Group has formed an Impartiality Committee to oversee practice and act in an unbiased manner related to any issues emerging. Refer to the committee Term of Reference (TOR.001).

¹ Having relationships does not necessarily present the certification body with a conflict of interest. However, if any relationship creates a threat to impartiality a conflict of interest may then exist. (ISO/IEC 17021:2006)

² A relationship that threatens the impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients etc (ibid)

- 3.2 Prior to each Impartiality Committee meeting the following information shall be provided to committee members:
 - 3.2.1 A summary of the Conflict of Interest Register (BORIS conflicts report) with any suggested updates
 - 3.2.2 A summary of audits completed since the last meeting with confirmation that conflict of interest forms have been completed.
 - 3.2.3 A summary of certifications awarded by the DAA Group Ltd
 - 3.2.4 Any appeals received
 - 3.2.5 Any other relevant matters
- 3.3 The Conflict of Interest Register (BORIS conflict report) has been established. This is updated when issues related to conflict of interest are identified and brought to the attention of either Client Manager.
- 3.4 The Impartiality Committee has responsibility for oversight of this register.