Impartiality Policy

The Cradle to Cradle Products Innovation Institute

Cradle to Cradle Certified™ Products Program

Version 1.1

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Impartiality Policy Statement

The Cradle to Cradle Products Innovation Institute (C2CPII) understands the importance of impartiality and potential conflicts of interests in carrying out its management systems certification activities.

C2CPII ensures impartiality through adherence to its Impartiality Policy (http://www.c2ccertified.org/resources/detail/cradle-to-cradle-certified-impartiality-policy). This policy is guided by the principles contained in ISO 17065, A.2.

C2CPII conducts annual impartiality risk assessments, which are reviewed by the Impartiality Committee. This committee is independent, and comprised of individuals qualified to conduct, evaluate and report its findings to top management for appropriate action.

Conflict of interest and objectivity are further covered through training sessions and contractually binding agreements to ensure all management system certification activities are conducted in an independent and impartial manner.
1 General

1.1 Purpose

The purpose of this policy is to provide guidance and requirements for ensuring impartiality in conducting C2C CPP certification activities.

1.2 Applicability

This policy applies to the C2C CPP when it is conducting certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities. This policy applies to any actions of persons, bodies, and organizations external to the C2C CPP that may pose a risk to impartiality.

2 Normative references

ISO/IEC 17065-2012: Conformity assessment – Requirements for bodies certifying products, processes, and services

3 Definitions and acronyms

Certification Body (CB): An entity accredited by the C2CPII to perform conformity audits, render certification decisions, and issue certificates based on the Cradle to Cradle Certified Product Standard in accordance with the principles of ISO 17065.

Certification Scheme Owner (Scheme Owner): The Cradle to Cradle Products Innovation Institute (C2CPII).

Client: An entity seeking or holding Cradle to Cradle certification for its product(s).

Cradle to Cradle Certified Product Standard (the 'standard'): The governing standard that serves as the basis for all Cradle to Cradle product certifications.

Certification Standards Board (CSB): The independent body of stakeholders responsible for the maintenance, interpretation, and revision of the standard in accordance with the By-laws, polices and procedures of the C2CPII.
Cradle to Cradle Products Innovation Institute (C2CPII): The 501(c)(3) organization based in San Francisco, California that is responsible for promulgating the adoption of Cradle to Cradle® principles; and administering and maintaining the *Cradle to Cradle Certified Product Standard*.

Cradle to Cradle Certified Products Program (CPP): The program operating within the C2CPII that oversees and conducts certification activities in accordance with ISO 17065.

Cradle to Cradle Certified Products Program Staff (CPP staff): The individuals on the C2CPII staff responsible for administering and maintaining the standard.

Impartiality: actual and perceived presence of objectivity

Stakeholder: Any individual or entity with a valid cause for engagement with the Cradle to Cradle Certified Products Program.
4 Structure

The C2C CPP is guaranteed independence of certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities from other C2CPII operations and activities.

4.1 C2CPII organizational chart
5 Resources for ensuring impartiality

5.1 Management commitment

5.1.1 Top management of the C2CPII is committed to allocating resources necessary to ensure impartiality of the C2C CPP when it conducts certification activities or *Cradle to Cradle Certified Product Standard* maintenance and revision activities.

5.1.2 C2C CPP management shall ensure C2CPII top management is aware of, and provides sufficient resources to ensure impartiality when it conducts certification activities or *Cradle to Cradle Certified Product Standard* maintenance and revision activities.

5.2 Documentation

5.2.1 This impartiality policy

5.2.2 A legally binding conflict of interest (COI) agreement and disclosure form shall be executed between the C2CPII and all C2C CPP personnel engaging in certification activities or *Cradle to Cradle Certified Product Standard* maintenance and revision activities.

   a) The agreement shall include provisions delineating conflict of interest.

   b) The agreement shall include provisions for updating and maintaining accuracy of disclosures of conflict of interest.

5.2.3 Records

   a) Records shall be kept regarding the identification of any threat to impartiality.

   b) Records shall be kept regarding corrective action taken to address any threat to impartiality.

   c) Records shall be maintained and retained in accordance with the C2C CPP QMS.

6 Process for ensuring impartiality
6.1 Identification of threats to impartiality

6.1.1 CPP personnel shall maintain vigilance to identify threats to impartiality.

a) Internal threats to impartiality posed by CPP staff or contractor actions shall be identified.

b) Threats to impartiality posed by persons, organizations, or bodies external to the CPP shall be identified.

6.1.2 External sources may identify threats to impartiality.

a) Any stakeholder may identify and report a perceived threat to impartiality.

6.1.3 Identified threats to impartiality shall be communicated immediately to CPP management. If deemed necessary for appropriate disposition, C2CPII top management shall also be informed.

6.1.4 CPP management or C2CPII top management shall evaluate the reported threat to determine its validity.

6.1.5 If deemed valid by management, a course of corrective action shall be developed and implemented.

6.2 Corrective action

6.2.1 Corrective action shall be sufficient to eliminate the threat.

6.2.2 Corrective action shall be implemented as quickly as possible by assigned qualified personnel or external person(s), as deemed appropriate by CPP or C2CPII management.

6.2.3 If corrective action requires additional training, such training shall take place as soon as possible.

6.2.4 If corrective action requires modification of a certification, any such modifications shall be implemented immediately and reflected in all certification documentation.

6.3 Annual impartiality risk assessment

The CPP shall conduct an annual risk assessment regarding threats to impartiality.

6.3.1 The annual risk assessment shall be conducted by qualified person(s) designated by CPP management or C2CPII top management.
a) Qualified CPP personnel approved by C2CPII top management may conduct the risk assessment, or

b) C2CPII top management and/or a qualified external person(s) or organization(s) may conduct the risk assessment.

c) As determined by C2CPII top management, qualified external person(s) or organization(s) may be engaged to conduct the risk assessment individually or in conjunction with CPP staff.

d) If deemed necessary to ensure the integrity of the risk assessment by CPP management or C2CPII top management, the risk assessment may be conducted entirely by a designated qualified external person(s) or organizations.

6.3.2 The risk assessment shall be conducted in a thorough and rigorous manner to identify threats regarding, but not limited to:

- Self-interest risks: when a person or an entity acts based on own interest and/or in order to benefit itself
- Self-review risks: when a person or an entity evaluates the results of services it has itself already provided or been closely associated with
- Over-familiarity risks: when a person or an entity is conducting conformity assessments based on trust and previous track records instead of verified evidence
- Relationship risk: when a person or an entity maintains a relationship which could compromise impartiality due to e.g. ownership, governance, management, personnel, shared resources, finances, contracts, marketing or referral of new clients
- Intimidation risks: when a person or an entity fails to act objectively due to fear of reprisals from a client or another stakeholder

6.3.3 Findings of the risk assessment shall be recorded with records maintained in accordance with the C2C CPP QMS.

6.3.4 Corrective action indicated by the risk assessment shall be implemented in accordance with 6.2

7 Mechanism for safeguarding impartiality
The certification scheme owner shall appoint a committee to safeguard impartiality.

7.1 Impartiality committee composition

The C2CPII shall appoint a committee with balanced representation to be the mechanism for safeguarding impartiality, comprised of

7.1.1 Secretary: Individual with knowledge of C2CPII operations and ISO 17065 requirements

7.1.2 At least one external member with appropriate ISO standard and impartiality risk assessment expertise

7.1.3 At least one member with certification, governance, or risk assessment expertise

7.1.4 Additional members shall be added at the discretion of C2CPII top management for the purpose of

  a) Providing additional expertise

  b) Providing additional stakeholder input

  c) Addressing specific issues, or other needs identified by C2CPII top management or this impartiality committee

7.2 Impartiality committee meetings

7.2.1 Meeting frequency

The committee shall meet annually, or at a greater frequency if deemed necessary to effectively perform its activities. Meetings may take place in person, or by electronic conference.

7.2.2 Meeting requirements

  a) The committee shall be granted access to all the information necessary to enable it to fulfill all its functions.

  b) Attendance comprising a quorum of 2/3 of the committee membership shall be required before the committee may provide any input to the CB.
7.2.2 The committee meeting shall address the issues identified in ISO 17065, A2 and provide input on the following:

a) Policies and principles relating to impartiality of the CPP’s certification activities

b) Any tendency on the part of the CB to allow commercial or other considerations to prevent the consistent impartial provision of certification activities

c) Matters affecting impartiality and confidence in certification, including openness

d) All other impartiality risks discovered in the course of the committee’s activities

7.3 Implementation

7.3.1 Input from the committee shall be presented to C2CPII top management for evaluation and development of a corrective action plan. The corrective action plan shall be approved by the committee prior to implementation.

a) The CB may not implement any corrective action that conflicts with its QMS, mandatory requirements, accreditation requirements, or regulations. Reasons shall be provided for not implementing such input.

b) Corrective actions shall be implemented by C2CPII top management within 15 days of receipt of the committee’s report. Extensions of corrective action implementation may be granted by the committee if adequate documented rationale is provided, and such rationale can be demonstrated to not compromise the integrity of the certification program.

c) The committee shall have the right to take independent action if the CB does not implement its input by informing stakeholders, accreditation bodies, or other authorities. Any such informing shall comply with the confidentiality requirements established by the parties involved (client, CB, AB, suppliers, etc.)

7.4 Documentation

7.4.1 Minutes shall be kept.

a) Meetings to determine composition of the impartiality committee

b) Impartiality committee meetings

7.4.2 Records of committee input shall be maintained.

7.4.3 Records of input implementation shall be maintained
7.4.4 Impartiality Committee reports and corrective action records may be made public in summary, or in whole at the sole discretion of C2CPII top management.