

Document 6 - Tech Skills International Impartiality Policy

Document Control		
Version	Date	Status
V1.0	5/11/2024	Initial Draft
V1.2	28/10/2025	Issued

Table of Content

1	Conflict of Interest	1
2	Conformity Assurance, e.g. Certification	1
3	Risk Analysis Procedures.....	3
4	Procedures to Address Conflict of Interest	4
5	Parties involved in Impartiality Committee	4
5.1	TSI Management.....	4
5.2	Third Party	4

1 Conflict of Interest

Tech Skills International (TSI) ensures independence, impartiality and transparency in all its activities. TSI strives to avoid situations where the risk of impartiality may arise, or a potential conflict of interest could exist, or be seen to exist.

TSI defines conflict of interest (COI) at the individual level as being when a person has a certain interest or close arrangement or affiliation with a specific organisation. In TSI, all such cases are disclosed by individuals and recorded in TSI database. An Impartiality Management Committee exists at the organisational level when the whole organisation is involved, irrespective of individual interests.

A conflict of interest occurs when an individual or organisation has multiple interests, one of which could possibly corrupt the motivation for an act in another. TSI structure and policies have been designed to avoid any potential or actual conflict of interest, at both individual and institutional levels. The following principles are applicable to the entire TSI to assure the impartiality and reduce the risk derived from conflict of interest:

1. Any individual engaged with a TSI project or certification activities or involved in other advisory or decision-making processes, including Board members and Impartiality Committee members, shall declare and sign a conflict of interest statement, and disclose any actual or potential conflicts of interest. Such disclosures shall be analysed, and appropriate risk mitigation measures undertaken;
2. TSI identifies, documents, analyses and mitigates risks of impartiality via, but not limited to, staff feedback and candidate feedback on an ongoing basis;
3. Oversight of TSI impartiality is through the TSI Review Group meeting on a regularly basis, but not longer than 6 months;
4. Dispute resolution is conducted by staff who are not involved in the subject of a dispute.

The basic principles of impartiality and avoidance of conflict of interest are described Section 2.

2 Conformity Assurance, e.g. Certification

To avoid conflict of interest, no certification-related consultancy will be given to an organisation which will be the subject of certification, unless consultancy is required or allowed by the certification/verification scheme. Certification-related consultancy is defined as participation in an active, creative manner to give specific advice to the company or institution being subjected to the certification issuance; with such advice relating to the development and implementation of management systems covered by the scope of the certification.

The following are considered by TSI not to be certification-related consultancy activities:

1. planning and organising generic information meetings, workshops, courses, conferences regarding certification, natural resource management, and other issues within the scope of TSI activities;
2. providing generic tools and guidance for applicants and organisations preparing for certification which are not specific or targeted towards the specific company in any way;
3. arranging and participating as a lecturer in the above-mentioned events with presentations that are confined to the provision of generic information which is freely available in the public domain, while not providing any company-specific advice;
4. making available or publishing on request, information relating to the interpretation of any relevant normative requirements;

5. running activities prior to certification aimed solely at determining readiness for assessment, where these activities do not result in the provision of recommendations or advice (e.g. pre-assessment, gap analyses);
6. adding value during assessments and surveillance visits, by identifying opportunities for improvement as they become evident during the audit;
7. applying for and running projects related to any topic within TSI scope of activities, where these projects are confined to tasks that do not have a direct relationship to the applicants or organization being assessed for certification.
8. any other activities that are not considered as participation in an active, creative manner in giving specific advice – within the scope of the certification activities – to the company or institution that is the subject of eventual certification.

The activities mentioned above may be implemented as projects financed by clients. TSI may be involved as part of a consortium with the task of implementing activities as part of such projects.

TSI certification officer conducts a review of each applicant to identify if the client was previously involved in project activities managed by TSI. The appropriate risk mitigation measures are undertaken once such cases are identified. In situations where TSI has been involved with the organisation in project activities, a case-by-case analysis is undertaken to evaluate whether a perceived or actual conflict of interest may exist. In complex cases, the advice of TSI Impartiality Committee may be sought.

TSI does not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organisation were used. Specifically, TSI shall not have any agreements with nor engage in any financial or contractual arrangements with a consultancy organisation or consulting company ('consultants') in which:

- TSI remunerates the consultant if the consultant recommends a client to TSI;
- conversely, the consultant pays TSI for a recommendation of the consultant to the client;

In cases where TSI may provide names of consultants to companies preparing for certification, details of at least two consultants will be provided, with this information provided free of charge; and TSI shall not engage any consultants to act as sales agents for TSI.

Auditors, certification decision-makers and dispute resolution staff shall not be assigned relevant client-related tasks if they worked with or provided consultancy to the client within the previous two years. However, if there has been a past relationship, this will be evaluated on a case-by-case basis and even if two years have passed, the person may not be assigned to these tasks if the potential still exists for conflict of interest.

3 Risk Analysis Procedures

TSI has a risk analysis procedure in place. TSI Review Group shall analyse threads to minimize the potential conflict of interest arising from certification activities. The table below lists the potential threats and the procedures to minimize the risks. Should any conflict of interest be not covered by the table below, the same procedures shall be implemented to minimize the risks.

Potential threats to impartiality	Risk Level (Level 1, 2,3 and level 3 has the highest risk)	Preventive Actions
Vested interest company, e.g. consultancy conducted by TSI	Level 3 (High)	TSI shall not provide IECEx 03 certification related services to Service facility Applicant
Commercial, financial pressure	Level 2	TSI has solid business in Australia by providing nationally recognized certification services in Australia. TSI also have comprehensive insurance covering all the services.
Related body	Level 1	TSI shall appoint an auditor who is independent of the Service Facility Applicant.
Misleading information	Level 2	TSI shall ensure all the information provided to the public is accurate. The information shall be verified before publishing to the website.
Internal conflict of interest	Level 1 (low)	TSI has monthly meeting to discuss the internal conflict of interest if any. The procedures in Document 15 – Preventive Actions shall be followed to address the internal conflict of interest.
External conflict of interest	Level 2	- Follow the tendering process - Strictly follow the Certification policies and procedures - Governed by Impartiality Management Committee
Auditor and certification officer	Level 3 (High)	- Sign confidential policies and procedures - Shall not provide IECEx 03 Scheme related services - Follow the policies and procedures for certification process
Note: TSI shall continuously monitor the potential conflict of interests arising from its certification activities. All the matters shall be documented, and the corresponding measures shall be taken to eliminate the issue.		

4 Procedures to Address Conflict of Interest

If there is a conflict-of-interest issue raised, the following procedures shall be applied to resolve it.

Steps	Procedures	Responsible Employee
Step 1	Risk analysis on the issue raised by following previous procedures	CEO, Certification Officer, Auditor, Administrator
Step 2	Identify what is the cause of the conflict of interest	
Step 3	Apply measure to eliminate the cause of the conflict of interest	
Step 4	Record all the above process	
Step 5	Continuous improvement	

5 Parties involved in Impartiality Committee

5.1 TSI Management

The following TSI staff will be involved:

1. Lei Cai (CEO/Auditor)
2. Santosh Pillay (Director)
3. Ryno Fourie (Auditor)

5.2 Third Party

The following Third-party members are involved with Impartiality Committee

1. Zeno Zhang – University of Western Australia
2. Safety office - Employsure
3. Quentin Longman – Industrial representative – Fortescue Future Industry (FMG)

Annually, an impartiality meeting will be held by TSI the following document 6.1 – Impartiality Meeting Template shall be applied and recorded.