

An aerial photograph of a makeshift settlement, likely a refugee camp. The ground is dirt and littered with debris. In the foreground, two people are walking away from the camera. One is wearing a black and white checkered shirt, and the other is wearing a light blue shirt and a pink hat. In the background, there are several makeshift structures made of wood and plastic sheeting. A large blue rectangular box is overlaid on the image, containing the title and date. The entire image is framed by a white border.

# POLICY ON IMPARTIALITY

MAY 2022

**Safe/Care**

HEALTHCARE STANDARDS



<b>Document title</b>	<i>Policy on Impartiality</i>		
<b>Documents number</b>	<i>QA-GEN-008</i>	<b>Effective date</b>	<i>05-05-2022</i>
<b>Document type</b>	<i>Policy</i>	<b>Version</b>	<b>2.0</b>
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**1. Purpose**

The purpose of this policy on impartiality is to ensure that all SafeCare Certification and Accreditation processes meet the highest ethical and legal standards within the industry.

**2. Scope**

The scope of this impartiality statement includes conflicts of interest, business ethics and transparency as it relates to all certification and accreditation activities (hereafter referred to as “SafeCare activities”) and processes, and all associated individuals and committees.

**3. Responsibilities**

- 3.1** SafeCare Foundation is the legal entity owning the SafeCare Healthcare Standards and ultimately responsible for certification and accreditation activities performed for and on its behalf; reference to SafeCare in this Policy and Public Statement refers to this legal entity.
- 3.2** PharmAccess Foundation, affiliate of SafeCare Foundation, is entrusted with the rights to manage and use the SafeCare brand, standard, tools and methodology for both SafeCare Certification and Accreditation activities.
- 3.3** SafeCare and PharmAccess management staff, country program directors, other staff, committees, (licensed) partners and subcontractors are responsible and fully understand the importance of impartiality in undertaking any SafeCare program activities.
- 3.4** SafeCare and PharmAccess will therefore ensure that in all its dealings with clients, or potential clients, all employees or other personnel are responsible and will remain impartial.
- 3.5** The implementation and monitoring, including disciplinary actions, will be the responsibility of the senior SafeCare management staff.

**4. Activities and related accountabilities**

**4.1. Corporate level activities and accountabilities**

The overall integrity of the SafeCare programs is the responsibility of SafeCare management. This includes ensuring that the policies and procedures are in place for all activities that may place impartiality at risk. This is particularly true for certification and accreditation decisions and maintaining external relationships.



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- SafeCare certificates are only issued following a review by an independent, authorised, and experienced member(s) of the certification committee (who has not been involved in the assessment) to ensure impartiality.
- SafeCare accreditation award decisions are made by an independent accreditation committee appointed by senior management. Committee members declare at each scheduled meeting if they have any conflicts of interest for any meeting agenda item and affirm, they have not been involved in any way in the accreditation process for which they are making a decision. To ensure impartiality, committee members with declared conflicts do not participate in the discussions or decision making related to the organization for which they have a conflict, by exiting the meeting room.
- SafeCare does not own or have any interest (financial or otherwise) in any other company that offers certification or accreditation or related consultancy services.
- SafeCare shall not carry out any other conflicting services other than its core businesses of Certification and Accreditation.
- Disciplinary actions for non-adhering to impartiality policies shall be taken by the SafeCare Management.
- SafeCare retains full control of all decision-making processes regarding granting, maintaining, renewing, extending, reducing, suspending, or withdrawing certification or accreditation.
- SafeCare recognizes that its source of revenue is client payment and licensing fees, and that this is a potential threat to impartiality.

#### **4.2. Surveyor and assessor activities and accountabilities**

- SafeCare will not assign a certification assessor or an accreditation surveyor to an assessment or survey of an organization where any past relationship has existed between the individual and that organization. Exceptions may be granted by the program director when there has been no relationship for a minimum of 2 years.
- SafeCare programs shall not allow any certification assessor or accreditation surveyor to provide services for an organization where any of the assessor or surveyor's family members / close relatives are involved at a decision-making level.
- SafeCare programs shall not allow any certification assessor or accreditation surveyor to conduct an assessment or survey for a client for which they have not been approved.



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- Assessors, surveyors, and others involved in the certification or accreditation process are not and will not be put under any pressure and will not be influenced in any way to predict or surmise the result of a certification assessment or accreditation survey prior to the formal decision.
- Assessors and surveyors, adhere to all SafeCare program policies.
- SafeCare shall not employ any professional conflicting its ethical policies.
- SafeCare shall not allow any of its assessors or surveyors to market their services and conduct own certification assessment or accreditation survey for the same client.
- SafeCare shall not allow any of its certification or accreditation staff to carry out financial transactions with clients.
- SafeCare programs shall not allow any certification assessor or accreditation surveyor to compromise on the assessment or survey timing as required per the SafeCare program norms.
- SafeCare programs shall maintain transparency regarding all information.
- No certification assessor or accreditation surveyor shall divulge any confidential information of the client to any third party without written consent from the client and approval by SafeCare Director.
- No certification assessor or accreditation surveyor shall remove or retain any client information without the express permission of the client.
- SafeCare shall not allow any of its certification assessors or accreditation surveyors to accept any gifts from a client; appropriate hospitality of a value lower than USD 25 is allowed.
- When allocated to a particular SafeCare activity, SafeCare and PharmAccess staff shall not disclose or discuss any detail before or after the assessment or survey to any member of staff other than their direct management or team members on a need-to-know basis, as required by their Secrecy obligations as laid out in their employment agreement.
- All assessors, surveyors, program personnel or sector specialists not considered permanent staff of SafeCare programs shall sign an Agreement for their services containing a Secrecy & Non-Disclosure Clause.



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#### **4.3. Activities related to outside agencies**

- SafeCare does not have (and will not form) any relationships with companies who offer consultancy or other services that can be construed as having an impact on the objectivity of the certification or accreditation services provided by SafeCare program.
- SafeCare does not and will not offer any commission, (finders fees or other inducements) to any individual or company in respect of referrals of clients unless:
  1. The terms and conditions of any such referral are clearly established and can be demonstrated and it can also be demonstrated that the fee is for a referral and the fact that a commission has been paid will in no way affect the outcome of a certification assessment or accreditation survey.
  2. A risk assessment (to establish the probability for an unacceptable threat to impartiality) has been carried out on the process.
  3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.

#### **4.4. Consultation and education activities and accountabilities**

- SafeCare may provide consultative and education services to its current or potential clients. These services are separated by an organizational firewall for accreditation services and no individual may provide both consultation and survey services to any current or future client within a period of two years.
- SafeCare does not offer company specific training in respect of implementing SafeCare standards. Any training offered by SafeCare is general in nature and available to all companies or individuals who wish to attend.
- SafeCare program staff or subcontractors shall not suggest or imply that certification or accreditation would be simpler, easier, or less expensive if consultancy or education services were used. In addition, subcontract staff cannot offer consultancy or training services to SafeCare program clients.

#### **4.5. The management of conflicts of interest and unethical practice or behavior**

- Individuals employed by SafeCare or otherwise contracted to SafeCare activities are required to document and record their current and past



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relationships with all companies. Any situation past or present which may present a potential conflict of interest is required to be declared.

SafeCare will use the information to identify any threats to impartiality and will not assign those individuals in any capacity unless they can demonstrate that there is no conflict of interest.

- All employees working on SafeCare programs shall disclose any situation impairing their business ethics.
- Any unethical practice observed by employees should be notified to the management at the earliest.
- Conflict of interest and objectivity is further covered through refresher annual training sessions and contractually binding agreements, to ensure all certification and accreditation activities are conducted in an independent and impartial manner.
- All directly employed Management and Staff are required to declare all financial interests or business activities that they have in other organizations and that could jeopardize their objectivity on commencement and during the period of employment if a change occurs.

## 5. Objectivity

- To obtain and maintain confidence, it is essential that the certification and accreditation decision related to SafeCare programs are based on objective evidence of standards compliance, and that any decisions made are not influenced by other interests or by other parties.
- SafeCare program decisions are made and signed for by a competent manager who was not responsible for the evaluation and was not a member of the certification assessment or accreditation survey team.
- SafeCare recognizes that threats to impartiality could include the following:
  - Self-interest threats arising from a person or body acting in their own interest.
  - Self-review threats arising from a person reviewing the work that they have conducted themselves.
  - Familiarity (or trust) threats arising from a person becoming too familiar with or too trusting of another, instead of seeking documented evidence.
  - Intimidation threats arising from a person being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.



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## 6 Public Statement (as it appears on the SafeCare website)

SafeCare, its Directors, Managers, Staff, and others involved in the Certification or Accreditation of Organizations fully understand the importance of impartiality in undertaking their activities.

SafeCare will therefore ensure that in its dealings with clients or potential clients, all employees or other personnel involved in SafeCare activities are, and will remain, impartial.

To ensure that impartiality is both maintained and can be demonstrated, SafeCare has identified, and assessed the risks related to all relationships which may result in a conflict of interest or pose a threat to impartiality.