

	<p style="text-align: center;"><b>IMPARTIALITY MANAGEMENT PROCESS</b></p>	<p style="text-align: center;">CARBON CHECK MANAGEMENT SYSTEM – CMS</p>
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**POLICY**

As a DOE (under UNFCCC CDM accreditation) and Verification body Carbon Check is committed to assess projects based only on the compliance to the requirements articulated by the decisions of the UNFCCC;, methodologies, tools and guidelines stipulated by the CDM EB, as well as those required by ARB; ISO 14065.

Towards that end the pricing policy of Carbon Check will take into account the following factors:

- a) Type of project- technology measure employed, single/bundled/PoA
- b) Number of sites
- c) Size of the project – small scale/large scale
- d) Geographical location of sites
- e) Tools & methodologies rates of our assessors which are in vogue from time to time

The time required to complete a validation/verification will depend on:

- a) Our available resources (FM7.7)
- b) Work in hand
- c) Complexity of project
- d) Availability of information/documents/evidence required to validate/verify any project.

Factors such as consultancy organisation used or financial organisation used for a project function will not play any role in matters of time, price, simplicity/complexity of validation/verification.

**1. PURPOSE**

To ensure that impartiality is managed with respect to all validations and verifications carried out by Carbon Check. The role of the Impartiality panel in the process is to provide independent oversight. The management of CCL is responsible for implementing the impartiality process.

**2. SCOPE**

Impartiality management relates to two levels:

- A. Organisational impartiality management (i.e those impartiality threats that apply to Carbon Check as an organisation) – where this procedure and FM6.1 are utilized.
- B. Project specific impartiality management – (i.e those impartiality threats that are specific to projects) - where this procedure and FM4.2 are utilized, in conjunction with the application review process, Proc 3.0.

This process applies to all validation and verification assessments and to all risks to impartiality which might include the following:

- a) Source of revenue: risks from a client paying for the validation or verification of greenhouse gas (GHG) assertions;
- b) Self-interest: risks from a person or body acting in their own interest, for example financial self-interest;
- c) Self-review: risks from a person or body reviewing their own work; assessing validation or verification activities of a client to whom the validation body or verification body provided consultancy would be a self review risk;
- d) Familiarity (or trust): a risk from a person or body being too familiar or trusting of another person instead of seeking validation or verification evidence is a familiarity risk;
- e) Intimidation: risks from a person or body having a perception of being coerced openly or secretly, such as a risk to be replaced or reported to a supervisor.

**3. PROCESS OWNER / OVERALL RESPONSIBILITY AND AUTHORITY**

The Executive director has overall responsibility and authority for ensuring that this procedure is implemented.

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#### 4. PROCESS / PROCEDURE

##### 4.1 Process Inputs

Inputs	Source	Acceptance Criteria
Application forms	Application and Planning Process Proc 3.0	Application form reviewed as per Proc 3.0
Impartiality threats	As above	Refer to FM 6.1 for guidance on risk acceptability

##### 4.2 Process Flow

Not currently applicable to this procedure - refer to section 4.4 for the process/procedure steps.

##### 4.3 Process Outputs

Outputs	Destination/s	Acceptance Criteria
Impartiality risk assessment	Carbon Check Management and public domain	Impartiality risk assessment completed in full
Managed impartiality threats	Client, UNFCCC and ANSI /ARB	Impartiality threats either removed or managed. If not possible - work not carried out by Carbon Check.

##### 4.4 Process/Procedure Steps

Step	Activity	Responsibility & Authority
1	<p><b>Commitment to impartiality</b></p> <ul style="list-style-type: none"> <li>- Include the top management commitment to impartiality in the Carbon Check quality policy.</li> <li>- Communicate this and ensure it remains publically available ie on the Carbon Check website.</li> <li>- Ensure the impartiality requirements are included in contracts (internal and external assessors and validation or verification role players, as per FM 7.4a and 7.4b. Refer to Proc 7.0)</li> </ul> <p>While carrying out the conflict of interest analysis the following risks, but not limited to them, shall be included:</p> <ul style="list-style-type: none"> <li>(a) <b>Source of revenue:</b> risks from a client paying for the validation or verification/certification work. This risk is significant when CCL has numerous contracts with the same client;</li> <li>(b) <b>Self-interest:</b> risks from a person or an organization acting in its own interest, for example financial self-interest;</li> <li>(c) <b>Self-review:</b> risks from a person or an organization reviewing its own work; assessing the CDM and ISO 14065 validation or verification/certification activities of a client to whom the CCL or its related bodies provided consultancy would be a self-review risk;</li> <li>(d) <b>Familiarity (or trust):</b> risks from a person or an organization being too familiar or trusting of another person instead of seeking validation or verification/certification evidence is a familiarity risk; and</li> <li>(e) <b>Intimidation:</b> risks from a person or an organization having a perception of being coerced openly or secretly, such as a risk to be replaced or reported to a supervisor</li> </ul>	Top Management

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Step	Activity	Responsibility & Authority
	<ul style="list-style-type: none"> <li>- While carrying out the conflict of interest analysis, Carbon Check shall:               <ul style="list-style-type: none"> <li>- Evaluate sources of income and assess whether financial or other commercial factors do not compromise impartiality;</li> <li>- Identify and document its actual/proposed involvement in CDM and ISO 14065 and ARB activities other than validation and/or verification/certification and carry out and document analysis of actual and potential risk to impartiality;</li> <li>- Identify and document all related bodies and identify actual/potential risks to impartiality, including potential conflicts arising from any such relationships;</li> <li>- Disclose and document, in a transparent and comprehensive manner the following information, as a minimum: the types of activities carried out by Carbon Check, its parent organization, entities belonging to the same group, related bodies, personnel and subcontractors in general and in particular regarding the CDM PA, including development, financing, consultation and training; and</li> <li>- Clearly define the functions of its related bodies and their relationships with the Carbon Check when describing its organizational structure. This should cover all relationships, such as:                   <ul style="list-style-type: none"> <li>(i) Relationships based on common ownership and governance, personnel;</li> <li>(ii) Shared resources, finances, and contracts; and</li> <li>(iii) Marketing and payment of commission or other inducement for bringing in business or the referral of new clients, etc.</li> </ul> </li> </ul> </li> </ul>	
2	<p><b>Constitute Impartiality Panel / Oversight of impartiality</b></p> <ul style="list-style-type: none"> <li>- Ensure that an Impartiality Panel is maintained for managing Impartiality.</li> <li>- Compile a Terms of Reference for the Panel that includes the role and authorities.</li> <li>- Refer to FM 6.2 Impartiality Panel Terms of Reference and Procedures.</li> <li>- Retain records of the panel members’ acceptance of nomination, using FM6.3, signed non-disclosure circumvention agreements, FM7.6, copies of CVs and that the members represent the stakeholders as identified in FM6.2.</li> <li>- Ensure that the Impartiality Panel functions in accordance with the Terms of Reference FM 6.2 Impartiality Panel Terms of Reference and Procedures.</li> <li>- Ensure that the recommendations regarding impartiality management are either implemented, or reviewed in accordance with the Terms of Reference FM 6.2.</li> <li>- Ensure records of Impartiality Panel meetings are retained.</li> </ul>	Executive director
3	<p><b>Determine the risks to impartiality and associated mitigation measures- Organizational</b></p> <ul style="list-style-type: none"> <li>- Use the Risk Assessment form FM 6.1 to determine the risks and mitigation measures.</li> <li>- Conduct at least one risk/impartiality review for the whole organization per year, or more often, at any time if there are concerns or threats noted.</li> <li>- Ensure the Impartiality Panel reviews and ratifies the risk assessment, FM6.1.</li> </ul> <p>The mitigation actions may be through, inter alia:</p> <ul style="list-style-type: none"> <li>(a) Prohibitions – Certain defined activities should not be carried out;</li> <li>(b) Restrictions – Certain defined activities should be carried out in a restricted manner with clearly defined control points to ensure mitigation; and</li> <li>(c) Disclosures.</li> </ul> <p>The mitigation strategies and actions whenever a change in the conflict of interest analysis has occurred.</p>	CEO, Compliance Officer, with reference to Impartiality Panel
4	<p><b>Determine the risks to impartiality - Project Specific</b></p> <ul style="list-style-type: none"> <li>- Use the same principles, but conduct the risk assessment as part of the Application and</li> </ul>	Executive director

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	<p>Planning process Proc 3.0, and log the outcomes using FM 4.2. All risks to impartiality shall be categorised as either high or medium or low.</p> <ul style="list-style-type: none"> <li>- If any risks are identified that require mitigatory measures, a mitigation plan shall be defined as per the procedure and associative form. Identified risks are to be referred to the Impartiality Panel for review at the next meeting, or if urgent, distribute to the Panel members for electronic decision; or call an emergency meeting.</li> <li>- Determination of Impartiality risk and mitigation measures shall be conducted prior to the commencement of any verification or validation services. In order to avoid risk to impartiality after the commencement of verification/validation services, non-conflict of interest shall be continually assessed throughout the life time of the project and up to one year after completion.</li> </ul> <p><b>Specific to ARB project activities:</b>            After commencement of offset verification services, Carbon Check will monitor and immediately make full disclosure, in writing, to ARB or the Offset Project Registry regarding any potential for a conflict of interest situation that arises for an offset project using a Compliance Offset Protocol. This disclosure will include a description of actions that the verification body has taken or proposes to take to avoid, neutralize, or mitigate the potential for a conflict of interest.</p> <ul style="list-style-type: none"> <li>- Carbon Check continue to monitor arrangements or relationships that may be present for a period of one year after the completion of offset verification services for an offset project using a Compliance Offset Protocol. During that period, within 30 days of the verification body or any verification team member entering into any contract with the Offset Project Operator or Authorized Project Designee for which the verification body has provided offset verification services, Carbon Check shall notify ARB or the Offset Project Registry of the contract and the nature of the work to be performed.</li> </ul>	
5	<p><b>Implement Safeguards to impartiality</b></p> <ul style="list-style-type: none"> <li>- As per the mitigation measures identified during the risk assessments –               <ul style="list-style-type: none"> <li>- organisational – FM6.1 and</li> <li>- project specific – FM4.2 respectively.</li> </ul> </li> <li>- Make provision for any anticipated validation/verification needs.</li> </ul>	<p>CEO with assistance from the Compliance Officer and Quality Manager</p>
6	<p><b>Avoidance of conflict of interest</b>            Carbon Check <i>shall not</i></p> <ol style="list-style-type: none"> <li>a) use personnel with an actual or potential conflict of interest;</li> <li>b) validate and verify greenhouse gas (GHG) assertions from the same GHG project unless allowed by the applicable GHG programme;</li> <li>c) provide any consultancy services to the responsible party that support the GHG assertion;</li> <li>d) validate or verify a GHG assertion where a relationship with those who provided GHG consultancy services to the responsible party that support the GHG assertion poses an unacceptable risk to impartiality.</li> </ol> <p>NOTE 1 A relationship such as that described in d) could 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.</p> <ol style="list-style-type: none"> <li>e) validate or verify a GHG assertion using personnel who were engaged by those who</li> </ol>	<p>Executive director</p>

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	<p>provided GHG consultancy services to the responsible party in support of the GHG assertion;</p> <p>f) outsource the review and issuance of the validation or verification statement;</p> <p>g) offer products or services that pose an unacceptable risk to impartiality;</p> <p>h) state or imply that validation or verification of a GHG assertion would be simpler, easier, faster or less expensive if a specified GHG consultancy service were used. NOTE 2 Arranging training and participating as a trainer is not considered a GHG consultancy service, provided that (where the training relates to GHG quantification, GHG data monitoring or recording, GHG information system or internal auditing services) it is confined to the provision of generic information that is freely available in the public domain (i.e. the trainer should not provide organization-specific or project-specific advice or solutions).</p> <p>i) CCL is committed to the following</p> <ul style="list-style-type: none"> <li>- CCL shall not have any direct relationship with its client other than validation and/or verification/certification work and third party conformity assessment;</li> <li>- CCL shall not undertake validation and/or verification/certification of a CDM or ISO 14065 project activity if CCL or any external assessor has been engaged in any function that has been identified as a threat to impartiality, such as any of the following relating to the CDM or ISO 14065 project activity:               <ul style="list-style-type: none"> <li>(a) Identification, development and/or financing of CDM PA or ISO 14065 project activities;</li> <li>(b) Consultancy related to CDM PA or ISO 14065 project activities;</li> <li>(c) Providing of training on CDM PA or ISO 14065 project activities and other related topics;</li> <li>(d) Marketing and tie-up promotion with CDM or ISO 14065 consultancy/financing organizations;</li> <li>(e) Offering/payment of commissions or other inducements for promotion or new business;</li> <li>(f) Use of personnel for validation and/or verification/certification of a CDM or ISO 14065 or ARB project activity who were previously associated with the client in their personal capacity or otherwise for any activity such as development, consultancy, training, etc.; and</li> <li>(g) Other organizational considerations such as performance targets in financial terms or in terms of a specific number of CDM PA or ISO 14065 project activities or ARB offset project to be validated and/or verified/certified during a period of time.</li> <li>(h) The conditions in CCL contracts with client shall not link CCL payments to the final outcome of the validation or verification/certification activities;</li> <li>(i) CCL personnel involved in validation and/or verification/certification activities shall be bound by CCL impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions for each validation and/or verification/certification activity; and</li> <li>(j) CCL personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding a CDM or ISO 14065 project activity, any advice, consultancy or recommendation to</li> </ul> </li> </ul>	

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Step	Activity	Responsibility & Authority
	<p>client on how to address any deficiencies that may be identified in the validation or verification/certification.</p> <ul style="list-style-type: none"> <li>- CCL shall not subcontract validation and/or verification/certification work to a legal entity that is engaged in the development, consultancy or financing of CDM PA or ISO 14065 activity or ARB offset project;</li> <li>- CCL shall not use external validators, verifiers or technical experts in a CDM or ISO 14065 project activity if they, or the organization that employs them, have been engaged in the development, consultancy or financing of this CDM or ISO 14065 project activity or ARB offset project;</li> <li>- CCL’s activities shall not be marketed or offered as linked with the activities of an organization that provides services in respect of development, financial assistance and consultancy for CDM PA or ISO 14065 or ARB offset project.</li> <li>- CCL shall not state or imply that validation and/or verification/certification regarding a CDM or ISO 14065 project activity or ARB offset project would be simpler, easier, faster or less expensive if a specified consultancy/financing organization is used;</li> <li>- CCL shall not use personnel who have been involved in, or have had relationships with the client of, a CDM or ISO 14065 project activity or ARB offset project under validation and/or verification/certification in any way within the last two years, to take part in validation and/or verification/certification work for the CDM or ISO 14065 project activity or ARB offset project. If the person in question was involved in the development of a CDM or ISO 14065 project activity or ARB offset project under validation and/or verification/certification, then CCL shall not use such person at all. Such CCL shall require its personnel, internal and external, to reveal any potential conflict of interest known to them.</li> <li>- CCL shall 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 shall not use such personnel, internal or external, unless any potential conflict of interests has been addressed and the measures taken to address these potential conflicts have been documented and implemented. If during the course of validation and/or verification/certification, such instances are known, the concerned personnel shall be removed from those functions immediately;</li> <li>- CCL shall require its personnel, internal and external, to report any situation of influence or pressure from client that may threaten their independence in the course of validation and/or verification/certification of CDM PA or ISO 14065 or ARB offset project. Based on such report, CCL shall take appropriate actions to ensure its independence in its validation and/or verification/certification work;</li> <li>- The conditions in the CCL’s contracts with client shall not link the CCL’s payments to the final outcome of the validation or verification/certification activities;</li> <li>- The CCL’s personnel involved in validation and/or verification/certification activities shall be bound by CCL’s impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions for each validation and/or verification/certification activity; and</li> <li>- CCL’s personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding</li> </ul>	

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Step	Activity	Responsibility & Authority
	a CDM or ISO 14065 project activity or ARB offset project, any advice, consultancy or recommendation to client on how to address any deficiencies that may be identified in the validation or verification/certification	
7	<p><b>Problems/complaints regarding impartiality</b></p> <ul style="list-style-type: none"> <li>- Log all problems/complaints as per the Action/problem management process, Proc 1.1</li> <li>- Report problems to the UNFCCC or ANSI or ARB where applicable</li> </ul>	CEO with Compliance Officer
8	<p><b>Management Review</b></p> <ul style="list-style-type: none"> <li>- Include any impartiality problems/complaints in the Management Review, Proc 1.6.</li> <li>- Management shall review the effectiveness of impartiality management including:               <ul style="list-style-type: none"> <li>- CCL shall analyse and review, at least once a year, all data and information relevant to impartiality, such as the conflict of interest analysis, the mitigation strategies and actions undertaken, any non-conformities (NCs) raised with regard to impartiality and the corrective actions implemented to correct the NCs.</li> <li>- Based on the data/information referred to above, CCL shall carry out, once a year, an analysis of the process to safeguard impartiality and a review of its effectiveness.</li> <li>- The recommendations of actions resulting from the review of the process of safeguarding impartiality shall be reported to CCL's top management. CCL shall keep record of this review – management review minutes and any associated updates to FM6.1.</li> </ul> </li> </ul>	Executive director
9	<p><b>Carbon Check shall ensure impartiality in their operations by, <i>inter alia</i>, through:</b></p> <ul style="list-style-type: none"> <li>- Having the top management's commitment to impartiality in validation and/or verification/certification functions as evidenced through defined policies and procedures, and operation and conduct of its activities (FM 7.5 and FM 7.6);</li> <li>- Make publicly available a statement that describes its understanding of the importance of impartiality in validation and/or verification/certification functions, how it manages conflict of interest and how it ensures the objectivity of validation and/or verification/certification functions;</li> <li>- Evaluate sources of income and demonstrate that financial or other commercial factors do not compromise impartiality;</li> <li>- Take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations;</li> <li>- Require personnel, internal and external, to reveal any potential conflict of interest known to them. Carbon Check should 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 shall not use such personnel, internal or external, unless any potential conflict of interests has been addressed and the measures taken to address these potential conflicts have been documented and implemented; and</li> <li>- Maintain a professional environment and culture in Carbon Check that supports behaviour of all personnel that is consistent with impartiality.</li> </ul>	Executive director

**5. PROCESS METRICS**

Measure	Responsibility	Frequency	Use of the data	Target
Nature of any impartiality problems/	Executive director	On receipt	To review whether the impartiality management process needs to be	Take action within 1 week

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Measure	Responsibility	Frequency	Use of the data	Target
complaints			modified. To manage the specific problem or complaint	
Number of justified impartiality problems/ complaints	Executive director and Compliance Officer	Annual	To review the effectiveness of the impartiality management	Zero justified impartiality complaints per year

**6. REFERENCES & ASSOCIATED DOCUMENTS/SOFTWARE**

**6.1 Documentation References**

Procedure:	Management and Financial Reviews	Proc 1.6
Procedure:	Application and Planning Process	Proc 3.0
Procedure:	Human Resources & Competence Management	Proc 7.0
Procedure:	Complaints, Appeals and Disputes	Proc 8.0
Form	Client Application Review & Planning/ Team Impartiality and Risk Review form	FM 4.2
Form	Impartiality Risk Assessment form	FM 6.1
Form	Impartiality Panel Terms of Reference and Procedures	FM 6.2
Form	Response to invitation to become member of impartiality panel	FM 6.3
Form	Employee agreement	FM 7.4
Form	Code of Conduct	FM 7.5
Form	Non-disclosure non-circumvention agreements	FM 7.6

**7. Records Table**

Record type/group	Responsibility	Access control/ Confidentiality	Minimum retention period	Disposal method
Impartiality risk assessment records – including FM6.1	Compliance Officer	Not confidential	1 Year	Discretionary
Impartiality Panel records, including minutes of meeting, acceptance of appointments	Technical Admin	Confidential	1 Year	Discretionary
Records of project impartiality review – FM4.2	As per Proc3.0			
Problems/complaints regarding impartiality	As per Proc 1.1			

**8. Revision History**

Rev Date	Rev. No.	Brief Details of Changes
Aug 2009	0	New document
Jan 2010	1	Added reference to as per FM 7.4 and 7.5 to Step 1 Added Step 9, to clarify Carbon Check's intention with regard to impartiality management Amended 5. Process Metric to reflect target of zero justified imparity complaints.

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		<p>Added cross references to Proc 8.0</p> <p>Clarified the frequency of impartiality reviews</p> <p>Added reference to new procedure, Proc 1.6</p> <p>Step 2: Added reference to FM 4.2 for project impartiality review recording</p>
October 2010	2	<p>Created and included reference to a separate Impartiality Panel Terms of Reference and Procedures, FM 6.2 (previously part of FM1.11).</p> <p>Removed references to FM 1.11</p> <p>Added explanation of the two levels of impartiality management to the Scope.</p> <p>Added detail to step 2, 3, 4 and 5.</p> <p>Updated Records Table.</p>
Oct 2011	3	Added para 166 of the CDM Accreditation Std version 3 under point 6
March 2012	4	<p>Added types of risks – step 1.</p> <p>Added records of signed non-disclosure circumvention agreements, FM7.6, copies of CVs to step 2</p> <p>Clarified mitigatory measure options in step 3.</p> <p>Added detail of review of effectiveness of impartiality mitigations to step 8.</p> <p>Added forms FM7.8 and FM6.3 under References (6.2)</p>
June 2012	5	Procedure aligned to Accreditation Standard Version 4
July 2012	6	Updating of authorisation and responsibility
Sept 2012	7	Updating responsibility from CEO to Executive director
May 2013	8	Inclusions for ISO 14065 and ARB requirements

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