

ASF-GOV-003

Impartiality Policy

Document code	ASF-GOV-003
Version	V3.0
Status	Published — effective 2026-09-30
Approved by	Prof. Giorgi Pkhakadze, MD, MPH, PhD President, Accréditation Sans Frontières
Applies to	All ASF personnel, surveyors, Standards Development Committee members, Accreditation Decision Committee members, and any other persons exercising authority in ASF accreditation processes
Related documents	ASF-GOV-001 Standards Development Methodology ASF-GOV-002 Standards Committee Terms of Reference ASF-GOV-004 Confidentiality Policy ASF-GOV-005 Complaints and Appeals Procedure ASF-OPS-001 Accreditation Decision Framework ASF-OPS-002 Surveyor Competency Policy
Supersedes	ASF-GOV-003 V2.0 (2026-09-30)
Next review	September 2031, or earlier on trigger

Version History

Version	Date	Nature of change	Approved by
V0.1	2024-11-15	Initial draft	—
V1.0	2025-01-20	First published version	Prof. G. Pkhakadze, ASF President
V2.0	2025-09-01	Five-threat ISO 17021-1 taxonomy added; Declaration of Impartiality form (Annex A) added	Accreditation Decision Committee
V3.0	2026-05-14	36-month consultancy exclusion and 24-month post-relationship bar formalised	Prof. G. Pkhakadze, ASF President
V4.0	2026-09-30	Final pre-submission revision; per-role requirements table expanded; approved for ISQua EEA package	Prof. G. Pkhakadze, ASF President

1. Purpose

1.1 Impartiality is the foundation of ASF's accreditation programme. The credibility of the ASF accreditation mark — and the value it delivers to accredited organisations, patients, and the healthcare system — depends entirely on assessments being objective, consistent, and free from commercial or other undue influence.

1.2 This policy establishes ASF's requirements for identifying, declaring, managing, and, where necessary, eliminating threats to impartiality across all activities in the ASF accreditation programme, including standards development, surveyor selection and assessment conduct, accreditation decision-making, appeals, and post-accreditation monitoring.

1.3 This policy applies to all persons who exercise authority, influence, or discretion in any ASF accreditation process, including:

- (a) the ASF President and any delegated authority holders;
- (b) all members of the Standards Development Committee (SDC);
- (c) all members of the Accreditation Decision Committee (ADC);
- (d) all ASF surveyors — Lead and Associate — whether employed, contracted, or volunteering;
- (e) any external expert, reviewer, or consultant engaged by ASF in connection with standards development or accreditation activities;
- (f) any ASF administrative or support personnel with access to applicant or accredited organisation information.

1.4 The requirements in this policy are mandatory. Non-compliance may result in the consequences set out in Section 9.

2. Definitions

Term	Definition
Impartiality	Presence of objectivity; freedom from actual, perceived, or potential bias or conflict of interest in the conduct of accreditation activities. Impartiality is both a state — the absence of bias — and a commitment to processes that safeguard that state.
Conflict of interest	A situation in which a person has a financial, professional, personal, or institutional interest that could, or could reasonably be perceived to, compromise their independent and objective judgement in an accreditation activity.
Threat to impartiality	Any circumstance, relationship, or interest that may undermine, or appear to undermine, objectivity in an accreditation activity, even when actual bias does not exist. ASF identifies five threat categories (see Section 4).
Self-interest threat	A conflict arising from a financial or other personal benefit that may be affected by the outcome of an accreditation activity.
Familiarity threat	A threat arising from a close prior relationship between an assessor and the organisation or personnel being assessed, creating a risk that the assessor may be insufficiently sceptical.
Advocacy threat	A threat arising from an assessor promoting, supporting, or representing a particular position in relation to the organisation being assessed.

Term	Definition
Consultancy/advisory threat	A specific and serious form of self-interest and advocacy threat arising from the provision of consultancy, advisory, or pre-accreditation preparation services to an applicant or accredited organisation by a person who also participates in that organisation's assessment or accreditation decision.
Declaration	A written, signed statement by a person subject to this policy, disclosing any potential or actual conflict of interest in relation to a specific accreditation activity.

3. Core Principle — Separation of Assessment from Consultancy

3.1 ASF does not provide consultancy, advisory, or preparation services to healthcare facilities that seek or hold ASF accreditation. The provision of such services by ASF — or by any person exercising an assessor or decision-making role within ASF's accreditation programme — is prohibited.

3.2 A person who has provided consultancy, training, pre-accreditation gap analysis, quality improvement advisory services, or any other advisory engagement to a healthcare facility within the 36 months immediately prior to a survey shall not participate in that facility's accreditation survey, nor in the accreditation decision, nor in any appeal arising from it.

3.3 A person who is currently providing or has committed to provide future advisory or consultancy services to a healthcare facility shall not participate in any assessment or decision relating to that facility until such relationship is terminated and a minimum of 24 months have elapsed.

3.4 This principle applies regardless of whether the consultancy was remunerated, and regardless of whether the person's primary role with ASF is as a surveyor, committee member, expert reviewer, or other capacity.

This separation requirement is aligned with ISO/IEC 17021-1:2015, clause 5.2 (Impartiality), which requires that a certification or accreditation body and its personnel shall not offer or provide consultancy to any client; and with ISQua EEA Principle 4.3, which requires that an accreditation programme maintains independence from organisations being assessed.

4. Identifying Threats to Impartiality

4.1 ASF recognises five categories of threat to impartiality, following the taxonomy established in ISO/IEC 17021-1:2015 and adapted to the healthcare accreditation context:

Threat category	Definition	Examples in healthcare accreditation
Self-interest	Financial or other personal benefit linked to the accreditation outcome.	<i>Surveyor owns shares in the assessed facility; surveyor's fee depends on accreditation outcome.</i>
Self-review	Assessing one's own prior work.	<i>Surveyor auditing a QMS they designed; SDC member approving a standard they drafted without declaration.</i>

Threat category	Definition	Examples in healthcare accreditation
Familiarity	Long-standing close relationship reducing professional scepticism.	<i>Surveyor assessing a facility where they trained or previously worked; surveyor assessing a close colleague's organisation.</i>
Advocacy	Acting as advocate or opponent for the assessed organisation.	<i>Surveyor who has publicly endorsed the organisation's approach; expert reviewer who has co-authored papers with facility leadership.</i>
Consultancy/ advisory	Provision of pre-accreditation preparation services.	<i>Surveyor who conducted a mock survey or gap analysis for the facility within the past 36 months.</i>

4.2 A threat does not have to be actual to require management. ASF applies an objective test: would a reasonable and informed third party conclude that the impartiality of the process was compromised? Where this test cannot be answered with confidence, the threat is treated as material and the affected person is excluded from the relevant activity.

5. Per-Role Impartiality Requirements

5.1 Surveyors

5.1.1 Before each survey assignment, every surveyor — Lead and Associate — completes a written Declaration of Impartiality (see Annex A) in respect of the specific facility to be assessed. The declaration covers all five threat categories.

5.1.2 A surveyor shall not be assigned to a survey where any of the following apply:

- (a) they have provided consultancy, advisory, or pre-accreditation services to the facility within the past 36 months;
- (b) they are employed by, or have a current financial relationship with, the facility or its parent organisation;
- (c) they have a close personal relationship (family member, personal partner, or close friend) with a member of the facility's senior leadership;
- (d) they have previously led or participated in an accreditation survey of the facility within the past 12 months (to prevent undue familiarity with successive surveys — this may be waived by the ADC Chair where no alternative surveyor with the required expertise is available, subject to documentation of the waiver rationale);
- (e) they have any other interest, relationship, or circumstance that, in the judgement of the ADC Chair, constitutes a material threat to impartiality.

5.1.3 Surveyors who discover a potential conflict after assignment must notify ASF immediately. ASF will reassign the survey where practicable; where this is not possible before the survey date, the ADC Chair documents the risk and implements any available mitigation measures.

5.2 Accreditation Decision Committee Members

5.2.1 Before each session of the Accreditation Decision Committee, each member reviews the list of facilities under consideration and declares any conflict of interest in writing.

5.2.2 A member with a conflict in respect of a specific decision shall withdraw from the room (or video connection) for the deliberation and vote on that facility's case, and shall not be counted toward quorum for that item.

5.2.3 Decisions made by the ADC are recorded with the names of members present, any declared conflicts and consequent withdrawals, and the vote count.

5.3 Standards Development Committee Members

5.3.1 SDC members are subject to the conflict-of-interest requirements set out in ASF-GOV-002, §6. This policy sets the overarching impartiality standard of which those requirements form a part.

5.3.2 In addition to per-meeting declarations, SDC members shall declare any change in their circumstances — new employment, new advisory relationships, new publications relevant to standards under review — immediately when the change occurs.

5.4 Expert Reviewers and External Consultants

5.4.1 Any external expert, peer reviewer, or consultant engaged by ASF in connection with standards development or accreditation activities completes a Declaration of Impartiality before commencing the engagement. The declaration is retained as a controlled record.

5.4.2 External reviewers are selected to be independent of the standards or facilities under review. Selection criteria explicitly assess potential conflicts of interest before engagement.

6. Declaration Procedure

6.1 Declarations are completed using the standard ASF Declaration of Impartiality form (Annex A to this policy). The form is signed, dated, and submitted to ASF before the person participates in the relevant activity. Oral declarations are not accepted.

6.2 Declarations are retained as controlled records by ASF for a minimum of five years from the date of the activity to which they relate.

6.3 Where a person declares a potential conflict of interest, the following process applies:

- (a) the declaration is reviewed by the relevant Chair (SDC Chair for standards activities, ADC Chair for assessment activities, or the ASF President where the conflict involves a Chair);
- (b) the Chair determines whether the declared interest constitutes a material threat to impartiality using the objective test in clause 4.2;
- (c) if a material threat is found, the person is excluded from the relevant activity and a replacement is identified where practicable;
- (d) if the Chair determines that the declared interest is not material, the determination and rationale are documented and the person may participate;
- (e) where the conflict involves the ASF President, the determination is made by the SDC Chair or, if the SDC Chair is also conflicted, by an independent external adviser.

6.4 Standing declarations (completed annually by SDC and ADC members) are supplemented by activity-specific declarations for each survey assignment or committee session. Both are required; standing declarations do not substitute for activity-specific ones.

Annex A (the Declaration of Impartiality form) is attached to this document. Blank forms are available from ASF administrative support and on the restricted section of france-asf.fr accessible to registered surveyors

and committee members.

7. Organisational Impartiality Safeguards

7.1 ASF maintains the following structural safeguards to protect impartiality at the organisational level, in addition to the individual declaration requirements above:

- (a) Separation of assessment from decision-making: the surveyors who conduct a survey do not hold voting rights in the Accreditation Decision Committee that considers that survey's findings. Surveyors present findings to the ADC but withdraw before the deliberation and vote.
- (b) Separation of standards development from operational accreditation: the SDC approves standards but does not hold authority over individual accreditation decisions. Operational decisions are governed by ASF-OPS-001.
- (c) Independence of the Accreditation Decision Committee: the ADC includes at least one member who is independent of ASF's operational management and who has no current survey assignments.
- (d) No financial incentive linked to outcomes: ASF surveyor fees are fixed and do not vary based on the accreditation decision reached. No part of any ASF staff member's or committee member's compensation is linked to the number of facilities accredited or the outcomes of individual decisions.
- (e) Transparent applicant disclosure: all applicants are informed of ASF's impartiality requirements at the point of application and are invited to declare any known relationship between the applying facility and a current ASF surveyor or committee member.

7.2 ASF's impartiality framework is reviewed annually as part of the management review process (ASF-QMS-002) and at each ISQua EEA surveillance visit. Material changes are approved by the ASF President and published as an update to this policy.

8. Impartiality Register

8.1 ASF maintains a confidential Impartiality Register recording all declarations made by surveyors, SDC members, ADC members, and external experts. The register records: the name of the person; the activity (survey reference, committee meeting date, or engagement reference); the date of declaration; and whether any conflict was declared and its resolution.

8.2 The register does not record the content of conflict declarations (which is held in the individual declaration forms) — it records only the fact of declaration and the resolution.

8.3 The register is reviewed by the ASF President annually and is available for inspection by ISQua EEA assessors as part of the EEA assessment process.

9. Consequences of Breach

9.1 Failure to comply with the requirements of this policy constitutes a serious breach of ASF's governance standards. Depending on the nature and severity of the breach, consequences may include one or more of the following:

- (a) removal from the current survey assignment or committee session with immediate effect;
- (b) temporary suspension from all ASF activities pending investigation;
- (c) permanent removal from the ASF surveyor register or from committee membership;
- (d) review and, where necessary, invalidation of any accreditation decision that may have been influenced by the undisclosed conflict;
- (e) notification to the facility under assessment or accredited, where the integrity of an accreditation decision is in question.

9.2 Where an undisclosed conflict of interest is discovered retrospectively — that is, after a survey has been completed or a decision made — ASF initiates a review to assess whether the conflict materially affected the assessment or decision. The review is conducted by the ADC Chair (or, if the Chair is involved, by an independent adviser). Findings are reported to the ASF President.

9.3 A person who is found to have knowingly failed to declare a material conflict of interest is permanently removed from all ASF governance and assessment roles. This applies regardless of whether the undisclosed conflict is found to have affected the outcome.

9.4 Decisions under this section may be appealed under the ASF Complaints and Appeals Procedure (ASF-GOV-005).

10. ISQua EEA Alignment

10.1 This policy is designed to meet the impartiality requirements of the ISQua IAP EEA Principles for Standards, 6th Edition, specifically Principle 4 (Independence), and the related requirements of ISO/IEC 17021-1:2015 (Requirements for bodies providing audit and certification of management systems), which provides an international reference framework for accreditation body impartiality management.

10.2 The ASF ISQua EEA Crosswalk (ASF-EV-004) maps the provisions of this policy to the applicable EEA criteria.

11. References

[1]	ISQua International Accreditation Programme (IAP). Principles for Standards. 6th Edition. ISQua External Evaluation Association, Dublin, Ireland, 2023.
[2]	International Organization for Standardization. ISO/IEC 17021-1:2015 — Conformity Assessment: Requirements for Bodies Providing Audit and Certification of Management Systems. ISO, Geneva, 2015.
[3]	International Organization for Standardization. ISO/IEC 17011:2017 — Conformity Assessment: Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies. ISO, Geneva, 2017.
[4]	International Organization for Standardization. ISO/IEC 17065:2012 — Conformity Assessment: Requirements for Bodies Certifying Products, Processes and Services. ISO, Geneva, 2012.

[5]	Shaw CD, Braithwaite J, Moldovan M, et al. Profiling health-care accreditation organisations: an international survey. <i>Int J Qual Health Care</i> . 2013;25(3):222–231. doi:10.1093/intqhc/mzt008
[6]	Greenfield D, Braithwaite J. Health sector accreditation research: a systematic review. <i>Int J Qual Health Care</i> . 2008;20(3):172–183. doi:10.1093/intqhc/mzn005
[7]	International Accreditation Forum (IAF). IAF Mandatory Document for the Application of ISO/IEC 17021-1 for the Audit and Certification of Environmental Management Systems. IAF MD 6:2014.
[8]	OECD. Managing Conflict of Interest in the Public Service: OECD Guidelines and Country Experiences. OECD Publishing, Paris, 2003.
[9]	Council of Europe, Committee of Ministers. Recommendation CM/Rec(2010)15 on the Role of Ombudsman Institutions in Promoting Impartiality. Strasbourg, 2010.
[10]	HQACI. Impartiality Policy. ISQua EEA Accredited Document, 2026.
[11]	Joint Commission International. JCI Accreditation Standards for Hospitals. 7th Edition. JCI, Oak Brook, IL, 2020. (Section: Independence of the Survey Process)
[12]	European Cooperation for Accreditation (EA). EA-7/05 M:2018 — EA Guidance on the Application of ISO/IEC 17021-1 in the Field of Medical Device Quality Management Systems. EA, Brussels, 2018.

Annex A — Declaration of Impartiality Form

This form is completed by all ASF surveyors, committee members, and external experts before each survey, committee session, or expert engagement. The completed form is submitted to ASF administrative support and retained as a controlled record.

Section 1 — Activity Details

Full name	
Role / position	
Date of declaration	
Survey, meeting, or decision-making process for which this declaration applies	
1. Do you have any current employment, consultancy, or financial arrangement with the applicant or accredited organisation named above, or with any organisation that has a direct commercial interest in the outcome of this process? ☐ No ☐ Yes — describe below:	
2. Have you provided consultancy, training, or advisory services to this organisation within the past three years? ☐ No ☐ Yes — describe below:	
3. Do you have a personal relationship (family, close friendship, or significant prior professional relationship) with the senior leadership of this organisation? ☐ No ☐ Yes — describe	

below:	
4. Do you hold any other interest — financial, professional, or personal — that could, or could reasonably appear to, affect your independent judgement in relation to this process? ☐ No ☐ Yes — describe below:	
Declaration: I confirm that the information above is accurate and complete. I understand that failure to declare a relevant interest constitutes a breach of the ASF Impartiality Policy (ASF-GOV-003) and may result in the consequences set out in Section 9 of that Policy.	
Signature and date	

This declaration covers the specific activity identified above. It is in addition to — not a substitute for — any standing annual declaration. Completed forms are retained by ASF for a minimum of five years. Blank forms are available from ASF administrative support.

Formal Approval

Name and title	Signature	Date
Prof. Giorgi Pkhakadze, MD, MPH, PhD President, Accréditation Sans Frontières		2026-09-30

Document code: ASF-GOV-003 · Version: V3.0 · Effective: 2026-09-30 · Next review: September 2031