

Stroma Building Control Ltd

Impartiality Policy

1.0 Introduction

This document details the specific actions undertaken by Stroma Building Control Ltd to ensure the impartiality of all Building Control related activities as an Approved Inspector.

Regulation 9 of the Approved Inspector Regulations, entitled 'Independence of Approved Inspectors', addresses the need for safeguarding impartiality, stating that Approved Inspectors shall have no professional or financial interest in the work they supervise unless it is minor work.

Regulation 9 of the Approved Inspector regulations 2010 allows surveyors to carry out minor work as detailed below:

- (5) For the purposes of this regulation "minor work" means-
- (a) the material alteration or extension of a dwelling-house which before the work is carried out has two storeys or fewer and which afterwards has no more than three storeys;
 - (b) the provision, extension or material alteration of a controlled service or fitting in or in connection with any building; or
 - (c) work consisting of the underpinning of a building;
- and for the purposes of this paragraph a basement is not to be regarded as a storey.

A copy of The Building (Approved Inspectors etc.) Regulations 2010 can be found here <https://www.legislation.gov.uk/ukxi/2010/2215/contents/made>.

The Building Control Alliance (BCA) released guidance safeguarding impartiality based on Regulation 9 in the following document: 'Safeguarding Impartiality of Building Control Bodies', recognising that 'this Regulation was intended to address the potential for conflict of interest occurring during the building control approval process' and states the BCA's view that similar principles should apply to public sector Building Control Bodies.

2.0 Commitment to Impartiality

Stroma Building Control Ltd has a top management commitment to the implementation of impartiality in our Building Control related activities. This Impartiality Policy outlines the importance of impartiality in conducting our Building Control activities and the management of conflicts of interest which will ensure the objectivity of these activities. Stroma Building Control's top management will review and manage any residual risk identified to ensure a high level of impartiality is maintained.

Stroma Building Control is able to demonstrate impartiality through the following undertakings:

- Stroma Building Control Ltd is a separate legal entity.
- An independent Senior Management Team is in place, with common Directors avoided where possible.
- A clear and documented Whistleblowing Policy is in place.
- No financial incentives are given to the AI on a specific project to 'cross-sell'.
- Building Control services are not 'bundled' into a broader service offering with discounts on the AI service.
- Testing and Environmental services are generally marketed separately from Building Control services.
- The service delivery of Stroma Building Control is run as a separate operation from other Stroma Group services.
- People delivering the Building Control services are independent of the other Stroma Group service operations.
- The Complaints Policy allows for clients to escalate potential breaches of impartiality.
- This Impartiality Policy is communicated to all employees and is available on the Stroma Building Control website. Senior Management ensures that this is reviewed on at least an annual basis.

The following procedures in our policy will ensure impartial and competent Building Control activities are undertaken.

2.1 Audits

To ensure that Stroma Building Control Ltd operates impartially, internal audits are conducted, as well as external audits being carried out under our ISO 9001:2015 Quality Management System certification.

The outcome of internal audits is reported to Stroma Building Control's Senior Management and discussed with external bodies such as CICAIR, BMTRADA and other industry stakeholders.

2.2 Conflicts of Interest

Building Control Inspectors must declare any potential conflict of interest when carrying out Building Control work, as documented in Stroma Building Control's Conflict of Interest Policy. Examples of conflicts of interest include but are not limited to being involved with private work.

Any conflicts of interest, for example where the surveyor has been involved in undertaking private work for the same project, this will be raised with the Inspector's Line Manager and discussed to reach a reasonable solution.

2.3 Complaints

A complaint can be made where the impartiality of Building Control activities is not being maintained. Please refer to the Stroma Building Control website on how to make a complaint <https://www.stroma.com/building-control/company/complaints>.

2.4 Whistleblowing

Stroma Building Control provides an internal Whistleblowing Policy for any employee who feels like they're being pressured to not act impartially or in an appropriate manner. This is communicated as part of an employee's induction and is available for all employees to read on the Stroma Staff Intranet.

3.0 Stroma Building Control Ltd and other Stroma Divisions

To ensure that Stroma Building Control operates fairly and impartially in carrying out Building Control activities, the following measures are implemented to ensure impartiality between Stroma Building Control and other Stroma Divisions:

- Stroma Building Control Ltd operates as an independent company in its own right, separate from all other Stroma Divisions.
- Stroma Building Control Ltd maintains independent financial status from all other Stroma Divisions.
- Stroma Building Control Ltd maintains separate staff records and an independent recruitment process.
- Stroma Building Control Ltd maintains the independence of its own policies and procedures through its Quality Management System. All policies and procedures under which Stroma Building Control Ltd operates, are administered in a non-discriminatory manner.
- Stroma Building Control Ltd operates mainly in independent offices, separate from all other divisions.
- Stroma Building Control Ltd maintains independence and security of information by ensuring that all electronic data and records for Stroma Building Control Ltd are stored on a secure separate server. This information can only be accessed by authorised personnel of Stroma Building Control Ltd. Hardcopies held in secure Stroma offices or off-site storage facilities are controlled with restricted access in
- The Stroma Head of IT Services holds direct responsibility for connecting authorised personnel to the server.

4.0 Stroma Building Control Ltd and Phenna Group

Stroma Building Control is also part of the Phenna Group. Phenna Group has several other organisations within its portfolio and therefore impartiality and independence must be a priority

To ensure clear lines of impartiality and independence are in place between Stroma Building Control and Phenna Group interested parties relating to building control activities, the following controls are in place:

- Stroma Building Control Ltd operates as an independent company in its own right, separate from the Phenna Group and their other interested parties.
- Phenna Groups CEO and CFO may attend Stroma Building Control Board Meetings.
- Phenna Group will support Stroma Building Control where any changes are recommended to ensure ongoing compliance, including any changes in the CICAIR Code of Conduct of the Building Control Performance Standards. Stroma Building Control Ltd's existing management structure remains in place and will otherwise continue to make all operational/day-to-day decisions.
- The Phenna Groups CEO and CFO are not permitted to discuss or share any confidential information relating to Stroma Building Control Ltd with any of their other parties unless required by regulation, law or for reporting requirements.
- Stroma Building Control Ltd maintains independent financial status from Phenna Group and their interested parties. Financial performance will be discussed with their CEO and CFO.
- Stroma Building Control Ltd maintains separate staff records and an independent recruitment process.
- Stroma Building Control Ltd maintains the independence and security of its information by ensuring that all electronic data and records for Stroma Building Control Ltd are stored on a secure separate server.
- Phenna Group CEO and CFO will be given access to information they require to understand the business's performance only, this will not include detailed information concerning specific projects or clients that is not relevant to performance reporting. Any detailed information shall only be shared under authorisation from the Stroma Building Control Ltd Managing Director.
- No access will be given to the Phenna Group and their interested parties to the Stroma Building Control CRM database or any other IT platforms unless authorised by the Stroma Building Control Managing Director.

The relationship between Stroma Building Control Ltd, Phenna Group and their interested parties will be kept under review and assessed no less than annually. Any new threats to impartiality and/ or independence are to be declared and discussed during monthly Board Meetings. Where any issues of impartiality or independence are identified, the appropriate remedial action will be undertaken and where policy notes are revised these shall be shared with CICAIR.

4.1 Phenna Group Other Businesses

Within this section, Stroma Building Control has undertaken a level of analysis to measure and rate the level of risk to the business when comparing our scope of work to those of other Phenna Groups interested parties. The following risk rating and profile explanation has been awarded against each of the Phenna Groups interested parties:

Risk Rating	Risk Explanation and Treatment Plan
High	The business operates in construction within England and Wales either as a direct competitor or a company with a material level of design responsibility. There is a threat to Stroma Building Controls' impartiality in dealing with the Phenna Group based on their other interest party. Senior Management will need to be satisfied that all risks are being managed and appropriate controls are in place, e.g. confidentiality policy, awareness of the Stroma Building Control Impartiality Policy etc. Discussions will be held during Board Meetings to address any concerns held by the management team and/ or Phenna Group. Stroma Building Control will notify CICAIR of any high-risk threats to impartiality.
Medium	The business operates in construction within England and Wales and may have a direct interest in some of Stroma Building Control's projects but does not operate with a material level of design responsibility. No immediate action will be required; however, management will need to ensure there are no conflicts or risks to impartiality. This will be discussed during management review meetings and any remedial actions agreed upon.

Low	The business either does not operate in a construction-related sector or where they do, they do not operate any services which are directly linked to Stroma Building Control's work as an approved inspector. No further action is required and this will be kept under review and amended should the business change its scope of work.
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Phenna Group Portfolio Organisation	Level of Risk
Hansen Aerospace Based in Boston, Massachusetts Hansen is a globally recognized leader in non-destructive testing.	
First Scottish Group First Scottish is Scotland's leading independent firm of professional searchers also providing intelligent documents management solutions.	
Professional Soils Laboratory UKAS accredited Geotechnical Soil Testing laboratory.	
Building Envelope Technologies Ireland's leading airtightness, building performance & compliance specialists.	
Group Management Electrical Surveys Provides Electrical Inspection, Test and Documentation services to many of the UK's leading Companies.	
ACS Group Provide a seamless all-in-one service for Geotechnical and Chemical laboratory testing, Site Investigation and Geotechnical Contaminated Land assessment.	
Austest Laboratories An independent testing and certification company based in Australia that assists manufacturers, importers, and exporters in gaining access to local and international markets.	
Buildcheck Certification UKAS and BFRC accredited specialists, providing both on-site and lab-based building testing and certification services to the construction and fenestration industries.	
Code a Weld A Fully accredited weld surveillance, inspection, and certification business.	
Elmhurst Energy Is the UK's largest accreditation scheme for energy assessors.	
GEO Site & Testing Services A UKAS certified GEO Technical Site and Labs Testing Services company based in Wales.	
ASM Group Offers a full range of health safety services.	
Corporate Access The leading automated fixed fee law searching firm in Ireland.	
Bolton NDT & Inspection Provides a comprehensive range of non – destructive testing services.	
Facit Testing Provides an extensive range of specialist electrical services such as fixed installation testing and remedial services.	
MATtest Southern Civil engineering materials testing, offering the most up-to-date methods for site and laboratory testing of asphalt, soils, and concrete.	
Thomas Bell-Wright International Consultants A Dubai-based, multi-accredited engineering firm providing independent Testing, Inspection and Certification (TIC) services primarily for the building construction sector.	

<p>Ecology Solutions A leading ecology consultancy practice.</p>	
<p>Safety Services Professional Occupational Health and Safety Consultants providing a complete health and safety service to the Construction industry & others.</p>	
<p>IASME Helps certify organisations of all sizes in both cyber security and counter fraud.</p>	
<p>Industrial Safety Inspections A leading independent engineering inspection organisation, helping commercial and industrial customers across the UK to meet their statutory obligations and protect their staff, plant, and assets.</p>	
<p>James Fisher Testing Services A leading provider of specialist testing services in structural investigation and materials testing in the UK and Ireland.</p>	
<p>Stroma Built Environment (incorporating Specialist Access) A leading provider of compliance and sustainability testing and assessment within UK construction. Key services include airtightness testing acoustic testing and inspections for rail, highways and buildings.</p>	
<p>Stroma Specialist Access A leading provider of inspection, maintenance and examination services for rail, highways, and buildings.</p>	
<p>Stroma Certification One of the UK's leading energy assessor accreditation schemes.</p>	
<p>JHAI A large, approved inspector operating across England and Wales.</p>	
<p>A-Star Testing and Inspection An international health and safety company that works with Global UTM, NDT and third-party testing and inspection services.</p>	
<p>PTS Pavement Testing Services Specialises in asphalt testing and mixture development; and certifies product acceptances.</p>	
<p>NAPIT Accreditation of competent persons in electrical, heating, plumbing, ventilation, microgeneration and building fabric trades in the UK. Their members may be responsible for third-party work completed on a project where a competent certificate is provided for completion.</p>	
<p>Celtest Tests soils, water, bituminous materials, concrete, and hydraulically bound mixtures in laboratories and in-situ for construction, civil engineering infrastructure, or quarrying projects.</p>	
<p>Complete Laboratory Solutions (CLS) A provider of sampling, analysis and on-contract analysts to the food, environmental, pharmaceutical and medical device industries.</p>	
<p>XAIS Asset Management They offer a range of complementary services to support and maximise value from existing assets with services to cover all aspects of Highways and Asset Management.</p>	
<p>Xtra Tec Ltd They provide laboratory and site testing within the construction industry.</p>	
<p>Simtec They provide testing services to the civil engineering industry.</p>	
<p>Mauric Johnson & Partners Fire Safety Engineering & Access Consultants</p>	
<p>Zeta Analytical Health science services.</p>	

4.2 Ongoing Review

The relationship between Stroma Building Control Ltd, Phenna Group and their interested parties will be kept under review and assessed no less than annually. Any new threats to impartiality and/ or independence are to be declared and discussed during Management Meetings.

Where any issues of impartiality or independence are identified, the appropriate remedial action will be undertaken and where policy notes are revised these shall be shared with CICAIR. The level of risk identified above will then be reviewed and amended where required, as well as any changes to the Phenna Groups interested parties and their scope of works.

5.0 Building Control Companies within the Phenna Group

In 2022 Phenna Group also acquired JHAI which is also licenced to operate as an approved inspector in England and Wales by CICAIR. It is considered by Stroma Building Control management that the controls listed under section 4.0 of this policy note are sufficiently robust for such an organisation.

In addition to these controls, management has also agreed that any transactions between the two companies such as sub-contracted site inspections shall be conducted on an "arm's length" basis under an appropriate memorandum of understanding.

Approval

This Impartiality Policy has been endorsed and approved by:

A handwritten signature in black ink, appearing to read "I O'Connor", is written over a light blue horizontal line.

Mr Ian O'Connor
Managing Director
Stroma Building Control Ltd
Dated: 16th December 2022