

Procedure for Legal Responsibility

1. Purpose To establish and maintain a systematic procedure by which GCQ Certifications India LLP demonstrates and documents its legal entity status and assumes legal responsibility for all Hygiene Rating audit activities, in strict alignment with the sub-clauses of Clause 3.1 of the QCI Requirements for Recognition of Hygiene Rating Audit Agencies.

2. Scope Applies to all departments, personnel, and defined audit units of GCQ Certifications India LLP involved in Hygiene Rating Scheme audit activities.

3. Definitions

- **Legal Entity:** As per 3.1.1, an organisation or part thereof that can be held legally responsible for audit activities.
- **Government Body:** Entities deemed legal under governmental status per 3.1.2.
- **Designated Audit Unit:** The internal division or branch formally tasked with audit execution, satisfying the “defined part of a legal entity” requirement of 3.1.1 and 3.1.3.

4. Responsibilities

Role	Responsibility	Related Sub-clause
Managing Partner	Overall accountability for legal status; approves legal documentation pack.	3.1.1, 3.1.3
Compliance Manager	Collects, maintains, and submits legal evidence; tracks changes.	3.1.1, 3.1.2
Legal Counsel	Reviews entity documents; validates government-status documentation if applicable.	3.1.2
Operation Manager	Ensures audit teams operate within the legally defined audit unit.	3.1.3

5. Detailed Procedure

5.1 Demonstrating Legal Entity Status (3.1.1)

1. Document Collection

- Obtain and file: Certificate of Incorporation/LLP Registration, LLP Agreement, PAN, GST certificates.

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2. Legal Review

- Legal Counsel verifies the entity is registered under the LLP Act, 2008, confirming legal personhood.

3. Annual Verification

- Compliance Manager re-validates documentation annually or upon renewal.

5.2 Applicability of Government-Body Equivalence (3.1.2) GCQ Certifications India LLP is structured as a private Limited Liability Partnership and is not a government body or government department; therefore, sub-clause 3.1.2 does not apply. Compliance Manager shall retain a statement in the legal evidence pack affirming the agency's private-entity status and continue to comply with all other applicable requirements of this document.

5.3 Defined Part of a Legal Entity (3.1.1 & 3.1.3)

1. Organisational Chart

- Create and maintained (**ref doc GCQ-FRM-HRA-01**) a chart showing GCQ's structure, highlighting the audit unit.

2. Responsibility Matrix

- Document roles linking the audit unit to GCQ's legal entity, demonstrating the unit is a "defined part" legally accountable.

3. Internal Acknowledgement

- Operation Manager circulates the chart and matrix to all personnel annually.

5.4 Submission for QCI Recognition

1. Evidence Pack Preparation

- Compile documents: all from 5.1, organisational chart, responsibility matrix (**ref doc GCQ-FRM-HRA-02**).

2. Application Submission

- Compliance Manager submits the pack with the Recognition application.

3. Retention and Acknowledgement

- Store certified copies; log QCI acknowledgement and reference number.

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5.5 Public Declaration of Legal Status

1. Website Publication

- Under “About Us”, state:
 - Entity: GCQ Certifications India LLP
 - Registered Office
 - Registration No. & Date
- Include a footnote: “HRAA recognition granted to GCQ Certifications India LLP, a legal entity under LLP Act, 2008.”

2. Audit Report Footer

- Embed entity details on every audit report and certificate.

5.6 Change Management & Notifications

1. **Trigger Events:** Amendments to LLP Agreement, address change, name change.
2. **Immediate Actions** (within 30 days):
 - Compliance Manager updates documents.
 - Legal Counsel reviews and approves.
 - Notify QCI with amending documents.
 - Update website declaration, organisational chart, responsibility matrix.

6. Records & Retention

- Legal Evidence Pack (hard/soft) – retained 5 years.
- Organisational Chart **(GCQ-FRM-HRA-01)**
- Responsibility Matrix **(GCQ-FRM-HRA-02)**
- Website archival snapshots of “About Us” pages.

7. Review & Audit of Procedure Annexures

- Annual internal review by Operation Manager& Compliance Manager.
- Any revisions approved by Managing Partner, logged in Document Amendment Log.

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