

	TECHNICAL DEPARTMENT	Issued Date: July 2024
	Impartiality & Confidentiality Policy	Issue: 1.0

ICCV is the legal entity responsible for certification activities; reference to ICCV in this Policy and Public Statement refers to this legal entity.

ICCV its Directors, Management, Staff and Subcontractors fully understand the importance of impartiality in undertaking its Certification Activities. ICCV will therefore ensure that in all its dealings with clients or potential clients all employees and/or sub-contractors are and will remain impartial. To ensure that impartiality is maintained both and can be demonstrated the following principles have been established.

- ICCV Certificates are only issued following a review by an independent authorised and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate
- ICCV does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- ICCV does not offer (and has never offered) an internal audit service to its certified clients.
- ICCV does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- ICCV 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 certification services provided by ICCV. Any proposed relationship between ICCV and any other company will undergo a risk assessment by the Impartiality Committee prior to that relationship being formalised. Any current relationships with companies, organisations and individuals will be risk assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the certification process.
- Individuals employed by or otherwise contracted to ICCV are required to document and record their current and past relationships with all companies. Any situation, past or present which may present a potential conflict of interest is required by ICCV to be declared. ICCV will use the information to identify any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest.
- ICCV will not allocate a member of staff or subcontractor to a certification audit where any past relationship has existed. Exceptionally and at the discretion of the Operations Manager an individual or subcontractor may be allocated to a certification audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- ICCV 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 an audit.
 2. A risk assessment (to establish the potential for an unacceptable threat to impartiality) has been carried out on the process through which any such payment is made to an individual or organisation (normally a consultant) requesting the commission for referrals.
 3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
 4. ICCV does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by ICCV is general in nature and available to all companies or

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individuals that it certifies or who is interested in engaging its services.

5. ICCV will ensure that it is not linked or marketed in any way which links it with the activities of a management system consultancy and will take appropriate action should any such link be identified.
6. Auditors and others involved in the certification process are not and will not be put under any pressure and will not be influenced in any way to come to a particular conclusion regarding the result of an audit.

ICCV's Impartiality Principles include the following:

- No outsourcing of Certification Audits to Consultancy Organisations.
- No Referral Fees to be paid to Consultancy Organisations.
- Facts based communication to Clients/ Consultancy Organisations.
- Adherence to all Accreditation and other ICCV Policies.
- ICCV shall not carry out any other conflicting services other than its core business of Certification.
- ICCV shall not employ any professional with conflicting ethical policies.
- ICCV shall not allow any of its certification auditors to market the services and conduct the audits for the same client.
- ICCV shall not allow any of its certification auditors to carry out financial transactions with clients / consultants.
- ICCV shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of ICCV shall disclose any situation impairing the business ethics.
- ICCV shall not allow any of the auditors to carry out audits for the client for a period of at least 2 years from the date of terminating their services for the client.
- ICCV shall not allow any certification auditor to compromise on the audit timing as required by ICCV's policies and procedures.
- ICCV shall not allow any certification auditor to conduct the audit for the client for which it has not been approved for.
- ICCV shall maintain transparency with regard to all information.
- No certification auditor shall divulge any confidential information of the client to any third party without written consent from the client and approval by the Operations Manager
- No certification auditor shall carry any client information with them after the usage period. All client information shall be returned after usage.
- Utmost care/ verification to be taken to ensure the correct scope of the certification audit.
- Any unethical practice observed should be notified to the Operations Manager or a member of the Executive Committee at the earliest possible time.
- ICCV shall not allow any of its auditors to accept any gifts from client / consultant of a value greater than A\$20.
- ICCV shall not allow any certification auditor to conduct audit of an organisation where any of the auditor's family members/ close relatives are involved in an ownership or in a decision-making capacity.



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- Disciplinary actions for non-adherence to impartiality policies shall be taken by the Executive Committee in consultation with the Impartiality Committee.
- To supplement in-house resources ICCV employs sub-contract auditors. At no stage does ICCV outsource its certification audits, outsource its certification decisions, or link its marketing activities with consultancy. ICCV retains full control of all decision making processes regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification.
- ICCV continues to evaluate the risks associated with its operations in the domestic and overseas markets to ensure it can meet liabilities associated with its certification activities. A risk analysis is maintained and reviewed annually (or in response to any increase in impartiality risk concerns) by means of the completion of an impartiality risk assessment by management for review by the Impartiality Committee. This will be done using the Impartiality Risk Assessment template.
- Conflict of Interest and objectivity is further covered through annual training sessions and contractually binding agreements, to ensure all certification activities are conducted in an independent and impartial manner.
- Certification Audit staff are prohibited from participating in the Audit / certification of any organisation to which they have given assistance, by consultancy or training (other than professionally registered auditor training), or where they have any financial or commercial interest for a minimum period of 2 years prior to the date of application of the organisation for registration.
- When allocated to a particular contract, Audit / certification staff shall not disclose or discuss any details; before or after the Audit / certification; to any member of staff other than their direct Management or other members of the ICCV team, as required by the Annual Confidentiality and Impartiality Risk Assessment signed on commencement of employment and then annually thereafter.
- All subcontracted Audit / certification staff or sector specialists used to support permanent staff of ICCV shall sign a Subcontractor Agreement and the Annual Confidentiality and Impartiality Risk Assessment with any disclosures considered for noting as part of the annual impartiality risk assessment.
- All directly employed Management and Staff are required to declare all financial interests or business activities on commencement and annually during the period of their employment.
- ICCV staff or subcontractors shall not suggest or imply that certification would be simpler, easier or less expensive if consultancy or training services were used. In addition, subcontract staff cannot offer consultancy or training services to ICCV's clients that they have been assigned to audit, during or after the assigned task has been completed.
- Overall the certification of companies who supply a service to ICCV is not deemed to be an unacceptable threat to conflict of interest. However, certification of a company in partnership with whom ICCV provides a direct service is deemed to be an unacceptable Impartiality Policy.
- ICCV recognise that the source of revenue for a certification body is the client paying for certification, and that this is a potential threat to impartiality. Therefore, ICCV is a self-financed independent organisation, with a number of controls to ensure that impartiality is retained. To obtain and maintain confidence, it is essential that ICCV's certification decisions are based on objective evidence of conformity or nonconformity, and that any decisions made are not influenced by other interests or by other parties. Certification decisions are made and signed for by a competent Certification Manager who was not responsible for the audit and was not a member of the audit team. ICCV recognises that threats to impartiality 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.



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- Familiarity (or trust) threats arising from a person becoming too familiar with or too trusting of another, instead of seeking audit evidence.
- Intimidation threats arising from a person having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

Staff and Subcontractor Requirements

All information received by or available to ICCV staff, sub-contractors or committee members (in whatever format) received in conducting audit activities, or during other certification activities, or during any dealings with an organisation for any other reason shall be regarded as strictly confidential and shall not be divulged to any 3rd party (unless specified in ICCV's agreements or procedures) without the express permission of the organisation or individual concerned. The requirement to keep confidential any information will also include any organisation that has a legitimate right to audit or inspect ICCV.

Where ICCV is required by law to release confidential information to a third party the client or individual concerned shall, unless regulated by law, be notified in advance of the information provided

However, where the organisation is seen to be operating contrary to legal requirements or has operating practices which pose a danger to staff, customers or the environment ICCV reserves the right to immediately report any such incident to the relevant authority. Any such reporting will only be undertaken with the permission of a director.

Access to Records

All records will be retained in a secure manner, only accessible to authorised staff via either paper records or electronic records. Sub-contractors will be limited to accessing information produced by them in conducting an audit. Records will only be made available to organisations who can demonstrate a legitimate (and legal) right to view those records and specifically to Accreditation Bodies.

Confidentiality Declarations

All staff, Subcontractors, Directors and Committee Members will be required to agree to ICCV confidentiality policy and sign a confidentiality agreement. Sub-contractors will also sign an agreement which also contains the responsibility to maintain confidentiality.

Public Statement (as it appears on ICCV's website)

ICCV, its Directors, Managers, Staff and others involved in the Halal Certification of Organisations fully understand the importance of impartiality in undertaking its Certification Activities.

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

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

This is ratified and signed upon by the ICCV Management Team as follows:

ICCV Chairman

Operations Manager at ICCV

