



# Auriga Research Pvt. Ltd. (Certification Division)

Author: Quality Manager	Doc No: ARPL-QP-11	Issue no.01, Revision no.01
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## 1. Purposes

This procedure establishes the process for protecting confidentiality and safeguarding potential conflict of interest during certification activities.

## 2. Scope

This procedure is applicable to all management system certifications.

## 3. References

ARPL-QM-1.3 ARPL Quality Manual  
ARPL-QM-2.0 FSMS Manual

## 4. Responsibility

Quality Manager is responsible for executing this procedure.

## 5. Description

### Confidentiality

All personnel, auditors (payroll or contractual), experts, witness auditors, observers, office staff, management, and impartiality committee or any other committee constituted by ARPL (Certification Division), who carryout ARPL (Certification Division) activities will maintain information which they become acquainted with as a result of their contact with the applicant or client, in strict confidence and secure, except where required by law or where such information is required to be disclosed in published directories or where records access is required by accreditation bodies.

Information considered confidential about a particular product or client, shall not be disclosed to a third party without written consent by the client. Where confidential information is required by law to be disclosed to a third party, the client shall be informed of the information provided, as permitted by law.

Information about the client from sources other than the client (e.g. complainant, regulators) shall be treated as confidential.

If any information of client is provided to any service provider; e.g. client status of certification to website developer etc.; then he/she also abide to our confidentiality policy & have to sign our confidentiality form.

ARPL (Certification Division) is responsible and have a legally enforceable agreement to safeguard the management of all the information obtained or created during the performance of certification activities at all levels of its structure, including committees and external bodies or individuals acting on its behalf. For the same confidentiality form from the employees (both permanent & contractual) & any person who can enter into information-sharing agreements and/or arrangements, also, certification agreement with every new applicant is maintained.

ARPL (Certification Division), through certification agreement, informs the client, in advance, of the information it intends to place in the public domain. All other information, except for information that is made publicly accessible by the client, is considered confidential.

ARPL (Certification Division) has processes and where applicable equipment and facilities to ensure the secure handling of confidential information. All the records and documents of client (including reports, checklists records, supporting evidences etc.) are stored at certification division office only. They are kept in almirah which can be assessed only through staff members. In any case; no-one is



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allowed to take the clients files or any other records of ARPL (Certification Division) or its client out of the office premises, without prior permission of the Managing Director/VP Corporate. These records are stored either in the hard copy or in soft copy. Their confidentiality is retained as no one can assess them without the permission of Managing Director/VP Corporate & before signing confidentiality form. Computers & laptops provided to staff are all password protected.

ARPL (Certification Division) will keep the records on applicants and clients secure to ensure that the information is kept confidential. Records will be transported, transmitted or transferred in a way that ensures that confidentiality is maintained.

All employees of ARPL (Certification Division) are abide by the confidentiality agreement, thus if anyone found to misuse any information or disobeying/on breach of confidentiality agreement legal action will be taken against that person.

**Conflict of Interest**

Conflict of interest do not exist or are resolved so as not to adversely influence subsequent activities of the certification body. Source of potential bias that may compromise, or reasonably be expected to compromise the unbiased conclusions. This could be due to previous employment, close relatives in decision making, consultation and ownership etc. ARPL (Certification Division) has a process to identify, analyses, evaluate, treat, monitor, and to document the risks related to conflict of interests arising from provision of certification including any conflicts arising from its relationships on an ongoing basis.

All employees and auditors shall be free from any interest that might cause actions in other than an impartial or non-discriminatory manner.

Any person, including those acting in a managerial activity, with conflicts of interest must be excluded from work, discussions, and decisions in all stages of the certification process and the monitoring of the operational activities of FSMS certification scheme and IndiaGHP & IndiaHACCP certification scheme, for all entities in which such person has held a commercial interest, including an immediate family interest, or has provided consulting services for management system certification (FSMS) and IndiaGHP & IndiaHACCP certification scheme and/or hazard analysis consultancy towards the client in question within two years following the end of the consultancy from the date of receiving application.

Also, any person involved in auditing & reviewing activities must follow the Personal attributes of an auditor, reviewer or technical experts as described in Job description competence & responsibility. Auditors and experts (including payroll or contractual) have obligation to declare any conflict of interest situation related to the site, for which they are allocated as auditors or experts, to ARPL (Certification Division) office immediately. Audit plan has to be sent to the auditee site in advance with the details of the audit team members and site has the right and responsibility to communicate to the ARPL (Certification Division) office if they have any conflict of interest situation with any of the audit team members.

ARPL (Certification Division) will refer a certified operation to a different accredited certifying agent for recertification and reimburse the operation for the cost of the recertification when it is determined that ARPL (Certification Division) or a responsibly connected person had a conflict of interest involving the applicant at the time of application.



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Any certifying agent or responsibly connected party has a conflict of interest if he/she holds or has held within 24 months prior to certification, a commercial interest (including immediate family interest) in the applicant's operation or has provided consulting services to the applicant. Indirect conflicts of interest will be avoided by having that operation's file handled and reviewed by ARPL (Certification Division) staff members who do not have any conflicts of interest with that operation.

Confidentiality agreement shall be signed by all ARPL (Certification Division) personnel including all auditors (on roll/empaneled) and technical experts, any committee members and individuals acting on behalf. Empaneled Auditors shall also sign confidentiality agreement before taking up an assignment for ARPL (Certification Division).

Agreement/contract with client indicates ARPL (Certification Division) can disclose confidential information to some other bodies like accreditation body and agreement group of a peer assessment purpose.

## 6. Records

<b>Record Name</b>	<b>Responsibility</b>	<b>Record Location</b>	<b>Period</b>
Annex A10 Non-Disclosure and Confidentiality Agreement	Quality Manager	ARPL (Certification Division)	03 Years
Annex A11 Non-Disclosure and Confidentiality Agreement for Observers and Witnesses	Quality Manager	ARPL (Certification Division)	03 Years
Annex A02.1 Code of Conduct	Quality Manager	ARPL (Certification Division)	03 Years