



WRAS Approvals & Certification Scheme Impartiality Policy

Abstract: This policy describes the measures that WRAS and its employees, contractors, contributors, committees and Impartiality Committee undertake to manage any conflict of interest to ensure the objectivity and impartiality of our management system certification activities.

This document is the property of WRAS and must not be reproduced, in whole or part, or otherwise disclosed without prior written consent.

The official, controlled copy of this document is the electronic version held within our network server and visible to all authorised users.

All printed copies, and electronic copies and versions, except the ones described above, are considered uncontrolled copies which should be used for reference only. It is the user's responsibility to ensure that any copies used are true duplicates of the current version

1. INTRODUCTION	3
2. CONTEXT	3
3. RESPONSIBILITY	4
4. IDENTIFICATION OF POTENTIAL CONFLICTS OF INTEREST	5
5. ELIMINATING & MINIMISING POTENTIAL THREATS TO IMPARTIALITY	5
6. COMMITTEE FOR SAFEGUARDING IMPARTIALITY	6
7. RULES FOR OPERATION OF THE IMPARTIALITY COMMITTEE	6
APPENDIX A: CONFLICT OF INTEREST	8
APPENDIX B – WRAS EMPLOYEE DECLARATION	10
APPENDIX C: IMPARTIALITY COMMITTEE MEMBERS’ COMPETENCIES	11
APPENDIX D: IMPARTIALITY COMMITTEE TERMS OF REFERENCE.....	12
APPENDIX E: EXAMPLE AGENDA FOR IMPARTIALITY COMMITTEE MEETINGS (WRAS.ADMIN-103F1).....	14
APPENDIX F: MANAGEMENT OF IMPARTIALITY (SECTION 4.2 OF BS EN ISO/IEC 17065: 2012).....	15
APPENDIX G: EXAMPLE OF THE WRAS IMPARTIALITY COMMITTEE CONFIDENTIALITY DECLARATION.....	16

1. Introduction

- 1 This policy describes the measures that the Water Regulations Approval Scheme Limited and its employees, contractors, contributors, committees and Impartiality Committee undertake to manage any conflict of interest to ensure the objectivity and impartiality of the management system certification activities.
- 2 WRAS provides a certification service to support the enforcement of the Water Supply (Water Fittings) Regulations 1999. WRAS services are available to all applicants whose products or materials could be sold and installed within the UK and is not conditional on organisation size or association membership.
- 3 Impartiality is defined by the International Organization for Standardization (ISO) as “the presence of objectivity, which is understood to mean that conflicts of interests do not exist or are resolved as not to adversely influence the activities of the certification body.” Other terms useful in conveying impartiality are: independence, freedom from bias, prejudice and conflict of interest, fairness, neutrality, open-mindedness, detachment and balance. Examples of the types of occurrences or behaviour that may be considered to be a conflict of interest are described in Appendix A.
- 4 WRAS does not manufacture or trade in any products or systems certified under the Scheme. On occasion, WRAS will be involved in providing advisory services in its area of competence. Such activities will be performed according to specific policies and procedures clearly distinguished from the product certification. The Certification Body does not give prescriptive advice or consultancy as part of an ongoing certification.
- 5 It is the WRAS policy that any approval activity for a client is undertaken by employees or contractors who:
- Understand the concept of impartiality and agrees to the WRAS Code of Conduct
 - Have signed a WRAS Confidentiality and Code of Ethics declaration (WRAS.Admin-103F1 – see Appendix B)
 - Have not provided product development consulting or internal management system auditing services to the client organisation within the last 2 years
 - Have no personal interest in the client organisation
 - Have no undisclosed benefits that relates to the audit findings or success of the client.
- 6 It is WRAS policy that any approval/certification issued by WRAS:
- Is signed off by the Certification Authority
 - Represents a fair and unbiased assessment of the client’s product or service
- 7 The WRAS Managing Director will appoint an Impartiality Committee as a mechanism for safeguarding the impartiality of the WRAS Service and the decisions of the Certification managers.

2. Context

- 8 This policy applies to all staff employed by, or contracted to, the Water Regulations Approval Scheme Ltd (WRAS).

- 9 WRAS has adopted principles, policies and procedures (systems) designed to maintain separation between the administration and assessment activities of the Certification Schemes.
- 10 There shall be a strict separation between the assessment practices and the provision of other services provided by WRAS.
- 11 To ensure that the activities of related bodies do not affect the confidentiality, objectivity or impartiality of certification, WRAS shall not provide, or offer to provide, any services it certifies others to perform.
- 12 Under no circumstances will WRAS provide consulting services to obtain or maintain certification.
- 13 Any development that WRAS may undergo resulting in the provision of other products and services, (such as services to design, implement or maintain quality systems) shall only be pursued if the confidentiality, objectivity or impartiality of the existing WRAS program is not compromised.

3. Responsibility

- 14 The Board of Directors and Managing Director are responsible for WRAS's business performance. The Managing Director will oversee the Impartiality Committee charter.
- 15 The Managing Director will provide reports to the Impartiality Committee on an annual basis or more frequently if required.
- 16 The appointed Chair of the Impartiality Committee will develop a mechanism to review and support of this policy. The Managing Director, or authorised delegate, will develop business systems in support of this policy.
- 17 All employees are responsible for their conduct at work. This policy and its related procedures apply to all employees, managers, committee members and directors of WRAS.
- 18 WRAS is committed to:
- Taking action to respond to any threats to impartiality that may arise from the actions of other persons, bodies or organisations
 - Offering Accreditation Body representatives all appropriate access, cooperation, and courtesy to enable monitoring of our compliance with the Accreditation Criteria
 - Not allowing commercial, financial or other pressures to compromise impartiality
 - Reporting any situation that may present employees or WRAS with a conflict of interests
 - Disclosing any potential or actual conflict of interest before accepting or commencing any work
 - Not using employees/contractors for certification services unless they demonstrate that they have no conflict of interests
 - Recording any actual or potential conflicts of interest
 - Evaluating our finances and sources of income and demonstrate to the Impartiality Committee and Board of Directors that commercial and financial matters do not compromise impartiality
 - Understanding how this policy effects our work environment
- 19 Reporting on any violations of this policy

4. Identification of Potential Conflicts of Interest

- 20 WRAS personnel are committed to the avoidance of potential situations regarding any conflict of interest. This effort covers all potential sources of any conflict of interests, whether they arise from within WRAS or from the activities of other persons, bodies or organisations, such as external resources (e.g. Test Laboratories).
- 21 Threats to impartiality can be based on ownership, governance, management, personnel, shared resources, finances, contracts and marketing or other inducement for the referral of new clients.
- 22 An Impartiality Risk Register will be created and maintained detailing potential conflicts of interest and the mechanisms utilised to mitigate them. This will be presented to the Impartiality Committee for review. The report demonstrates to the Committee that WRAS's impartiality processes are sound and that there are no commercial, financial or other pressures that may compromise its impartiality.
- 23 The Impartiality Committee shall understand its role in the financial review and their responsibility for questioning aspects of the report that may compromise impartiality.
- 24 Measures taken by WRAS to prevent situations concerning any conflict of interest include:
- Training to ensure that all certification personnel are aware of the potential for conflicts of interest
 - Development of procedures to reduce situations that may result in potential conflicts of interest
 - Specific checks made in the certification team recruitment & selection process
 - Investigation into the details of any situation that may be perceived as a potential conflict of interest.

5. Eliminating & Minimising Potential threats to impartiality

- 25 Prior to employment, all prospective members of the certification teams will provide details of previous employment including references to any situations which may present a conflict of interest with WRAS services.
- 26 In general, members of the Approvals team will not be used to review or make a certification decision for a product that they have provided consultancy for or worked with in the past two years. When new members join the team, such conflicts and the period of control will be reviewed and declared on the impartiality declaration. The specific conflict identified will also be recorded in the impartiality risk register.
- 27 If outside contractors are to be used, a review of their application shall determine if any conflict might exist, and what actions are to be taken in the event potential conflicts exist.
- 28 All WRAS employees and contractors shall sign a Confidentiality Agreement and Code of Ethics when initially employed or contracted.
- 29 The Managing Director will review the activities of the organisation annually and verify that no conflicts exist due to any business relationships. This review will be documented during the annual management review.
- 30 The Impartiality Committee will undertake a review of the impartiality of WRAS operations including the conflict avoidance processes undertaken.

- 31 WRAS will take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organisations.
- 32 Employees may be subject to disciplinary actions, up to and including termination if impartiality requirements are contravened.
- 33 Contractors and external resources will be subject to actions up to and including cancellation of contracts and termination of all relationships with WRAS, if the impartiality requirements are not met.
- 34 Other persons, bodies, and organisation's not previously covered may be subject to appropriate action, including legal action, in order to assure termination of any activity determined to compromise the integrity and impartiality of WRAS's certification program.
- 35 Employees agree to follow the WRAS Anti-bribery policy regarding the acceptance of gifts, gratuities or payments (other than token) offered by any clients, or potential clients.

6. Committee for Safeguarding Impartiality

- 36 An Impartiality Committee has been established as a mechanism for safeguarding impartiality and to provide an independent review and oversight of the quality management certification activities.
- 37 The Impartiality Committee shall be comprised of a balanced representation of interested parties such that no single interest predominates. This may include representatives of the Regulators, Enforcers, trade associations, ISO 17025 Laboratories and the Scheme Owner. WRAS employees and paid contractors are considered as a single interest and may not predominate the Impartiality Committee.
- 38 The role of the Impartiality Committee is to verify that certification activities are performed in an impartial manner without undue influences that might negatively impact the impartiality of services rendered.
- 39 The principle responsibilities of the Impartiality Committee are to:
- Provide input in developing the policies relating to impartiality of its certification activities
 - Counteract any tendency on the part of the WRAS Quality Systems to prevent the consistent objective provision of certification activities,
 - Provide advice on matters affecting the confidence in certification, including views on openness and public perception,
 - Conduct a review of the impartiality of the certification and decision-making processes of WRAS.
- 40 Other tasks or duties may be assigned to the Impartiality Committee provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

7. Rules for Operation of the Impartiality Committee

- 41 The Composition, Terms of Reference and Agenda for the Impartiality Committee will be authorised by the WRAS Managing Director.

- 42 The Impartiality Committee will be given access to all the information necessary to enable it to fulfil its functions. The meeting will include review of the impartiality of the audit, certification and decision-making processes of WRAS.
- 43 The scope of the review will include:
- A review of the WRAS policies on Impartiality
 - Review of any complaints received by WRAS relating to the impartiality of the scheme.
 - Impartiality Risk Register
 - Report of financial evaluation.
- 44 The Committee will meet annually, with a WRAS representative acting as chair for the meeting. The Quorum for this meeting will consist of a minimum of three committee members, which must include a WRAS representative who will be available to provide any information required by the committee.
- 45 The committee is authorised to review the overall operations of WRAS relative to impartiality.
- 46 The minutes and recommendations of the meeting will be documented and distributed to the committee members, the WRAS Managing Director and the WRAS Audit and Risk Committee (a formal sub-committee of the WRAS Board of Directors).
- 47 The persons comprising the committee will all be highly skilled individuals from different organisations, each having a proven record in their field and are considered competent to perform reviews and offer advice. The competency characteristics of Impartiality Committee members are described in Appendix C of this procedure.
- 48 Specific Terms of Reference for the Impartiality Committee is described in Appendix D of this procedure.
- 49 As a part of its activities, the Impartiality Committee will be made aware that if WRAS Audit and Risk Committee does not respect its advice, the Committee has the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking independent action, the committee shall respect the confidentiality requirements of clients and WRAS.
- 50 Records generated from the Impartiality Committee shall be retained by the Secretary of the Committee for a minimum retention period of 10 years.

Appendix A: Conflict of Interest

There are many types of conflicts of interest in the workplace and a conflict of interest is an ethical violation, particularly when an employee knowingly acts in a way that is contrary to the interests of their employer. Some of the broad categories of conflicts of interest include:

- **Nepotism:** which is the hiring or otherwise displaying favouritism toward relatives or friends in business dealings.
- **Financial interests:** Financial conflicts of interest occur when an employee stands to profit from a business decision outside of the interests of the organisation they are representing, such as owning shares of a company with which the employee's organisation is conducting business or receiving gifts or payments from the outside organisation in exchange for a contract.
- **Self-dealing:** This is a general term describing the behaviour of an officer of the company acting in their own interests as opposed to those of the organisation they represent.
- **Consultancy** is the provision of independent expert advice on a specialist subject. Providing advice regarding the design or engineering of a product to a water fittings manufacturer would be considered consultancy. Providing such advice by WRAS employees would open the organisation to a number of risks:
 - Accusations of impartiality from other manufacturers as advice may be seen to offer a competitive advantage.
 - Individual's interpretation may differ from an official WRAS view
 - Manufacturers may expect to receive approval if such advice is followed.

This differs from providing information regarding the operation of, and gaining approval from the certification scheme. Official WRAS guidance on a particular interpretation would be published publicly to be available to all interested parties.

- **Romantic relationships:** Employees who engage in personal or romantic relationships in the workplace may be involved in a conflict of interest, especially if one is higher up in the same chain of command and can make decisions that affect the other, such as promotions, bonuses, and firings. Dating business clients may also present a concern.

Examples of a Conflict of Interest

Examples of conflicts of interest that may occur and be considered to be a risk to impartiality:

Nepotism

- An employee hiring a sibling or close friend as a contractor for the organisation.

Financial Interest

- An Approvals Assessor accepting gifts or payments from a manufacturer, which sways their opinion or evaluation regarding an application for approval.
- An employee or outsourced contractor involved in the assessment process having financial stakes in a company whose product is submitted for approval.
- An employee of WRAS revealing secrets or unpublished information to a third party or competitor.
- A WRAS employee providing advice and consultancy to a competing business.
- A WRAS employee providing design advice to a product manufacturer that may, or be interpreted to, provide a competitive advantage over other applicants or approval holders.

- A WRAS employee sharing unpublished information obtained by WRAS with another organisation in exchange for payment or the promise of work.

Self Interest

- An employee providing paid services to a client they know through the work undertaken at WRAS as a side role.
- A current or former employee using information and knowledge learned at WRAS to start a competing business that offers similar services or products.
- A worker moaning about WRAS on Social Media

Appendix B – WRAS Employee declaration



WRAS Impartiality, Confidentiality and Code of Ethics Declaration

The Water Regulations Approval Scheme Limited (WRAS) approvals schemes for Water fittings and Materials operate under the conditions detailed in the ISO/EN 17065 standard for the Conformity Assessments of Certification Bodies. This places great importance on the management of impartiality within the scheme and as such requires (in section 6.1.3) that all personnel and practitioners involved in the certification process sign a statement to commit themselves to the following:

- Comply with all the rules and policies defined by WRAS, including those relating to the confidentiality of information and independence from commercial and other professional interests.
- Have read, understood and comply with the WRAS Approvals & Certification Scheme Impartiality Policy (WRAS.Admin-103).
- Declare any prior and/or present association with a supplier or designer of materials or water fittings that may be or may become involved in the WRAS Product or Materials Approvals Scheme.
- Reveal any association with any developer, operator or provider of services or processes that may be utilised by WRAS in the course of their role for the Approvals Scheme.

Declaration:

As a member of the WRAS team, I recognise the importance of these requirements in ensuring the proper conduct of my role within the WRAS Products and Materials Approvals Schemes, and I agree to abide by its terms.

I confirm that I have reviewed and understood the above, and will reveal to WRAS Management any situation which arises that may present myself, or WRAS with a conflict of interest.

Signature _____

Name _____

Date _____

Appendix C: Impartiality Committee Members' Competencies

Area of competence	Personal attributes, knowledge and skills	Evaluation criteria
Personal attributes: ethical, open-minded, diplomatic, observant, perceptive	Ability to counteract any tendency on the part of WRAS to allow considerations preventing consistent, objective provision of certification activities	Employment biography or personal recommendation
Management system and reference documents	Knowledge of applicable WRAS procedures and practices	Completion of the WRAS Induction Program
Participation in committee activities	Attendance and involvement in committee business	Attendance and participation
Applicable laws, regulations and other requirements	Ability to identify and understand the application of the relevant laws and standards related to the process	Employment history or personal recommendation

Appendix D: Impartiality Committee Terms of Reference

Aims of the Impartiality Committee:

The formation of the Impartiality Committee is a requirement under the general provisions of the Certification Scheme Standard, ISO 17065 against which WRAS will be assessed by the United Kingdom Accreditation Service (UKAS) as a body operating a product approval system.

The key responsibilities of the Impartiality Committee will be to monitor the WRAS certification processes and ensure they are operated in line with the scope identified in the Product Certification Scheme

The Impartiality Committee is independent of all other committees and activities of WRAS.

The Committee will support the certification schemes by assessing and monitoring the impartiality of the certification process and provide regular reports to the WRAS Board.

Chairmanship:

The Impartiality Committee Chair shall be a representative of WRAS as the Certification Scheme Owner and will be appointed by the WRAS Managing Director. This may be the MD themselves or an alternative WRAS representative.

Secretary:

The Secretary of the Impartiality Committee shall be the WRAS Quality Manager or an alternative authority designated by WRAS. The Secretary shall be responsible for issuing calling notices, circulating meeting papers and taking and distributing minutes.

Membership and Attendance:

There shall be a maximum of six members in the Impartiality Committee. Members will be comprised of a Committee Chairman, and up to five independent members with relevant knowledge, competency and experience.

Members shall be appointed for a period of three years and may be reappointed to serve a maximum of three terms unless extended by the Chairman, for a maximum of 2 years at any one time.

To establish the committee, members shall be appointed by the Managing Director over the course of two years.

Voting:

If voting is required each Committee member shall be entitled to vote. Where voting is required it shall take place on a simple majority basis, with each vote being equal. The Secretary shall have no voting rights.

Quorum:

A quorum will be declared if three members are present. In circumstances where the Chairman is not present, the remaining members of the Committee can vote a temporary Chair for part of or, if necessary, the entire meeting.

Frequency of Meetings:

The Impartiality Committee will meet at least annually, either in face to face meetings or using alternative conferencing methods. The Impartiality Committee may meet on other occasions at the discretion of the Chairman.

Reporting:

Minutes and reports of Impartiality Committee activity shall be distributed to Committee members and WRAS Board Directors and others at the discretion of the Chairman. Minutes shall be made available to UKAS in accordance with the general requirements for bodies operating certification systems.

Business of the Impartiality Committee:

The Impartiality Committee will consider all matters relating to the maintenance of scheme objectivity including, but not limited to:

- Monitoring the certification process of the WRAS in line with the Scope of the Product Certification Scheme as it applies at the time
- Ensuring the requirements of ISO17065 regarding the Management of Impartiality are met, (see Appendix F).
- Reporting on issues relating to internal and external auditing of specific regulations that apply to WRAS's certification process
- Testing of WRAS's structural and operational impartiality and reporting any matter material to the progress of UKAS accreditation to the WRAS Board of Directors.
- Support and monitor the maintenance of UKAS accreditation of the WRAS Approvals Schemes.

Appendix E: Example Agenda for Impartiality Committee Meetings (WRAS.Admin-103F1)

WRAS Approvals & Certification Scheme Impartiality Policy 

Agenda for Impartiality Committee Meetings

Objectives:

Impartiality Committee meetings will be chaired by a WRAS member who will provide all required information. The committee may make recommendations to develop new and existing policies to ensure compliance relating to the objectivity of the Certification schemes.

Each review will be fully recorded, and the official minutes will be distributed to the Committee members and the WRAS Board of Directors following the meeting. Review findings will be presented to the Board of Directors.

Attendees:

At least three members of the Committee, in addition to the secretary (or deputy) are required for a quorate meeting, and others as requested.

Impartiality Committee Agenda

- 1 Welcome
- 2 Approval of Minutes and actions from previous meeting
- 3 Review of impartiality matters arising from WRAS certification and decision-making processes. Input from Customer feedback, Audit Programme & Management Review and financial evaluation.
- 4 Review of the WRAS Impartiality Policy.
- 5 Review of the Impartiality Risk Register.
- 6 Review of the log of applications prioritised on receipt
- 7 Review of the impact on Impartiality of any organisational or governance changes at WRAS.
- 8 Review commercial activities or other considerations affecting impartiality in providing certification services.
- 9 Members opportunity to raise any impartiality concerns or potential risks. For example, any personal observations from news items or matters raised with them that may affect the confidence in certification, including openness and public perception.

Output

Output from the committee shall include the minutes and actions arising from the meeting. All actions shall be assigned, together with deadlines for completion, to named individuals who must be informed of their responsibility. Ultimate responsibility for overseeing that actions are dealt with effectively and appropriately and in a timely manner sits with the WRAS Managing Director.

WRAS.Admin-103F1 Version 3.0 Issued on: 01/04/20 Page 1 of 2

Appendix F: Management of Impartiality (Section 4.2 of BS EN ISO/IEC 17065: 2012)

4.2 Management of impartiality

4.2.1 Certification activities shall be undertaken impartially.

4.2.2 The certification body shall be responsible for the impartiality of its certification activities and shall not allow commercial, financial or other pressures to compromise impartiality.

4.2.3 The certification body shall identify risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel (see 4.2.12). However, such relationships may not necessarily present a certification body with a risk to impartiality.

NOTE 1 A relationship presenting a risk to impartiality of the certification body can be based on ownership, governance management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.

NOTE 2 Identifying risks does not imply risk assessments as stated in ISO 31000.

4.2.4 If a risk to impartiality is identified, the certification body shall be able to demonstrate how it eliminates or minimizes such risk. This information shall be made available to the Impartiality Committee.

4.2.5 The certification body shall have top management commitment to impartiality.

4.2.6 The certification body and any part of the same legal entity and entities under its organizational control shall not:

- be the designer, manufacturer, installer, distributor or maintainer of the certified product;
- be the designer, implementer, operator or maintainer of the certified process;
- be the designer, implementer, provider or maintainer of the certified service;
- offer or provide consultancy to its clients;
- offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.

NOTE 1 This does not preclude the following:

- the possibility of exchange of information (e.g. explanations of findings or clarifying requirements) between the certification body and its clients;
- the use, installing and maintaining of certified products which are necessary for the operations of the certification body.

NOTE 2 "Management system consultancy" is defined in ISO/IEC 17021:2011, definition 3.3.

4.2.7 The certification body shall ensure that activities of separate legal entities, with which the certification body or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its certification activities.

NOTE See 4.2.3, Note 1.

4.2.8 When the separate legal entity in 4.2.7 offers or produces the certified product (including products to be certified) or offers or provides consultancy, the certification body's management personnel and personnel in the review and certification decision-making process shall not be involved in the activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the certification body, the review, or the certification decision.

NOTE For the evaluation personnel, impartiality requirements are stipulated in Clause 6 and additional requirements are given in the other relevant International Standards cited in 6.2.1 and 6.2.2.1.

4.2.9 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy (see 3.2). A certification body shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

4.2.10 Within a period specified by the certification body, personnel shall not be used to review or make a certification decision for a product for which they have provided consultancy (see 3.2).

NOTE 1 The period can be specified in the certification scheme or, if specified by the certification body, it reflects a period that is long enough to ensure that the review or decision does not compromise impartiality. A specified period of two years is often used.

NOTE 2 For the evaluation personnel, impartiality requirements are stipulated in Clause 6 and additional requirements are given in the other relevant International Standards cited in 6.2.1 and 6.2.2.1.

4.2.11 The certification body shall take action to respond to any risks to its impartiality, arising from the actions of other persons, bodies or organizations, of which it becomes aware.

4.2.12 All certification body personnel (either internal or external) or committees who could influence the certification activities shall act impartially.

Appendix G: Example of the WRAS Impartiality Committee Confidentiality Declaration



WRAS IMPARTIALITY AND CONFIDENTIALITY DECLARATION

The WRAS Approvals Schemes for Water fittings and Materials operate under the conditions detailed in the ISO/EN 17065 standard for the Conformity Assessments of Certification Bodies. This places great importance on the management of impartiality and confidentiality within the operation of the scheme.

In order that you can effectively carry out the duties of the committee, we may need to disclose to you confidential information as defined below and in respect of which we require that you enter into confidentiality obligations to protect the legitimate business interests of Water Regulations Approval Scheme Limited (WRAS) and of the applicants to which the Confidential Information relates.

Meaning of Confidential Information

"Confidential Information" means all information in whatever form disclosed or made available to you by or on behalf of WRAS or its employees, officers or representatives in the course of your observation of the Group.

Confidentiality Obligations

In consideration of WRAS providing you with Confidential Information required in order for you to carry out the duties of the committee, you hereby agree as follows:

- (1) You agree not to use, employ or exploit the Confidential Information (whether for yourself or on behalf of any third party) otherwise than for the purposes of carrying out the Duties.
(2) You will treat the Confidential Information disclosed to you as confidential and will not disclose the Confidential Information to any third party or use it in any way other than for the purpose of carrying out your Duties. You will at all times preserve the secrecy and confidentiality of the Confidential Information.
(3) You will not reproduce the Confidential Information in any form, including electronically readable or hard copy form, unless this is absolutely necessary to carrying out your duties and you have obtained our prior written consent. All physical documents, records and materials containing the Confidential Information, or any part of it delivered to you or created by you will remain the property of WRAS and you will, on request, deliver them to us together with any copies.
(4) The restrictions in paragraphs 1, 2 and 3 of this letter ("the Restrictions") do not apply in any case where you are required to disclose any of the Confidential Information by law (save where you have voluntarily accepted such obligation to disclose) nor to the extent that any of the Confidential Information becomes public knowledge through no fault of your own.

Impartiality and your obligations where there is a conflict of interest

Water Regulations Approval Scheme Ltd, Unit 13, Willow Road, Pines y Fan Industrial Estate, Crumlin, Gwent, NP11 4EG, Tel: +44 (0) 1495 244 866, Email: info@wrasapprovals.co.uk, Registered in England No. 10822384, Registered Office: 10 Woodrow Close, Hazel Grove, Stockport, Cheshire, SK7 9LQ, Website www.wrasapprovals.co.uk



We also require you to have read, understood and comply with the WRAS Approvals & Certification Scheme Impartiality Policy (WRAS.Admin-103) and declare any association with any organisation that provides services or processes that may be utilised by WRAS in the course of their role for the Approvals Scheme.

Should you become aware at any time that your duties and obligations as part of the Committee are in conflict or may possibly be in conflict with your interests outside of the Committee, or with any commercial interests of your employer or any associate, then you shall immediately suspend your Duties and raise the matter immediately with the Chairman of the Committee. If the Chairman concludes that a conflict exists, you shall withdraw from that part of the business of the Group which gives rise to the conflict of interest. The decision of the Chairman as to whether a conflict exists and which parts of the business of the Committee you shall withdraw from shall be final.

Please confirm your agreement to the above by signing a copy of this letter and returning it to us.

Declaration:

I confirm that I have reviewed and understood the above, and will reveal to WRAS Management any situation which arises that may present myself, or WRAS with a conflict of interest.

Signature: _____

Name: _____

Date: _____