



SOLAR RATING
& CERTIFICATION
CORPORATION*



SMALL WIND
CERTIFICATION
COUNCIL*

3060 Saturn Street, Suite 100
Brea, CA 92821
t: 888.ICC.SAFE (422.7233)
t: 562.699.0543
f: 562.695.4694

ICC-SRCC™ IMPARTIALITY POLICY

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1. INTRODUCTION

The *ICC-SRCC Impartiality Policy* (“Policy”) is based on the fundamentals set forth in *ISO/PAS 17001:2005, Conformity assessment – Impartiality – Principles and requirements*: objectivity, independence, adherence to conflict of interest issues (identify, avoid, mitigate, and manage perceived and actual conflicts of interest), disclosure, neutrality, detachment, and balance.

2. PURPOSE

The purpose of this policy is to identify, minimize and eliminate risks to ICC-SRCC’s impartiality as regards its product evaluation and certification activities.

3. REFERENCES

ISO/IEC 17065-2012 Conformity assessment - Requirements for bodies certifying products, processes and services

ISO/PAS 17001-2005 Conformity assessment - Impartiality - Principles and requirements.

ICC-SRCC Bylaws

ICC-SRCC Impartiality Committee Operating Rules

ICC-SRCC Organization Chart

Confidentiality Policy

Conflict of Interest Evaluation Form

4. GENERAL

ICC-SRCC shall conduct all certification-related activities based on: independence, freedom from conflicts of interest, freedom from bias, freedom from prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment and balance. All certification body personnel (either internal or external) or committees who could influence the certification activities shall act impartially.

4.1 Commitment to Impartiality.

All regular and contract employees shall sign a declaration that includes a commitment to maintain impartiality when it comes to product evaluations.

4.2 Organization

ICC-SRCC shall ensure that certification activities are undertaken impartially. The certifier shall operate in an impartial, responsible, and well-organized fashion to carry out its work, according to the policies and procedures described in this manual and its related documents. The ICC-SRCC organization and functions shall be conducive to

providing an impartial certification process as indicated in the *ICC-SRCC Organization Chart*.

4.3 Influences compromising impartiality (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.

5. ORGANIZATIONAL CONTROL RELATED TO RISK (4.2.3, 4.2.6)

The impartiality of all accredited ICC-SRCC certification programs processes and procedures shall be safeguarded against any activities or relationships of the certification body or personnel engaged in certification processes. This includes members of committees tasked with certification program related functions. ICC-SRCC and any part of the same legal entity and entities under its organizational control shall not:

- a) be the designer, manufacturer, installer, distributor or maintainer of the certified product;
- b) be the designer, implementer, operator or maintainer of the certified process;
- c) be the designer, implementer, provider or maintainer of the certified service;
- d) offer or provide consultancy to its clients;
- e) 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.

The certification body's organizational control shall not preclude the following:

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

5.1 Evaluation Personnel Providing Consultancy (4.2.10, 3.2)

Internal or external personnel shall not be used to review or make a certification decision for any ICC-SRCC certification program for a product for which they have provided consultancy within the last 24 months. ICC-SRCC shall retain and annually update the *Conflict of Interest Questionnaire* for all employees involved in certification activities to identify potential risks to impartiality.

5.2 External Personnel Involved in Certification Activities (4.2, 6.2.2.3, 6.1.3)

ICC-SRCC shall have a legally binding contract with any party that provides the outsourced service related to certification activities. The agreement shall include provisions requiring compliance with all confidentiality and conflict of interest policies of the certification body. The agreement shall require the contractor to reveal any situation known to them that may present them or ICC-SRCC with a conflict of interest.

5.3 Relationships with Separate Entities (4.2.7)

ICC-SRCC shall ensure that activities of separate legal entities, with which it or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its certification activities. The Committee shall review the influence that separate entities could have in regards to risk to impartiality and safeguarding against risk to impartiality during the risk evaluation process in regards to subcontracting and outsourcing.

5.4 Activities of Separate Legal Entities (4.2.8)

The Impartiality Committee shall review periodically ICC-SRCC activities as a certification body and relationships to other legal entities.

- a) When the separate legal entity offers or produces a product certified under an ICC-SRCC program 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.
- b) The personnel of the separate legal entity shall not be involved in the management of the certification body or involved the review or the decision-making process of the certification programs.

5.5 Marketing and Offerings Related to Certification Programs (4.2.9, 3.2)

ICC-SRCC's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy. ICC-SRCC shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used.

6. MANAGEMENT OF IMPARTIALITY (4.2.2.1, 4.2.12 & 4.3)

6.1 Ongoing Risk Evaluation

ICC-SRCC 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. ICC-SRCC shall review relationships that may 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 as part of ongoing risk assessment efforts.

ICC-SRCC shall conduct assessments of risks to impartiality in an ongoing fashion by means of the following:

- a) Annual completion of *Analysis of Risks to Impartiality Form* and review during Management Review and Committee meetings.
- b) Peer reviews of evaluation processes
- c) Renewal of subcontractor agreements prior to or upon expiration
- d) Annual renewal of agreements with approved testing laboratories and inspection providers.
- e) Internal and external audits.

The results of these assessments shall be provided to the Committee.

7. MECHANISMS TO SAFEGUARD IMPARTIALITY (5.2)

The ICC-SRCC Impartiality Committee shall formally investigate risks to the impartiality of ICC-SRCC annually. The investigation shall use a risk-assessment method, such as FMEA (failure modes and effects analysis), and shall be documented. Risks assessed during the investigation shall include:

- Risks arising from ICC-SRCC's policies, programs, and procedures,
- Risks associated with business decisions, marketing strategies, and financial considerations,
- Risks arising from ICC-SRCC's relationship with its parent company, the International Code Council (ICC) and subsidiaries including but not limited to ICC Evaluation Service (ICC-ES) and the International Accreditation Service (IAS),
- Risks to impartiality from the activities or interests of ICC-SRCC committee members,
- Risks associated with the work of subcontractors and partners, and
- Potential bias in the work of individual employees.

All complaints relating to impartiality or conflict of interest for ICC-SRCC's certification programs shall be provided to the ICC-SRCC Impartiality Committee for review and resolution in accordance with the *Complaint Policy*.

7.1 Risk Evaluations

Risk evaluations shall be conducted on a periodic basis by the ICC-SRCC Impartiality Committee as governed by the *ICC-SRCC Impartiality Committee Operating Rules*.

7.1.1 Identification and mitigation of risks to impartiality (4.2.4)

Any risk to impartiality identified by the ICC-SRCC Impartiality Committee any identified shall be recorded. The Committee shall identify actions for risk mitigation or elimination along with steps and timelines for the implementation. The results of Committee risk evaluations shall be provided to ICC-SRCC management and staff, and shall serve as inputs to the Management Review process.

7.1.2 Reporting

Evaluations and proceedings of the Committee shall be recorded as required in the *ICC-SRCC Impartiality Committee Operating Rules*.

8. RESPONSE TO RISKS TO IMPARTIALITY (4.2.11)

Anytime a risk to impartiality is identified, whether they arise from within ICC-SRCC or from the actions of other persons, bodies or organizations, ICC-SRCC management must take action to eliminate the risk or to minimize it. The identified risk and resulting actions must be documented and the information made available to the ICC-SRCC Impartiality Committee.