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Confidentiality Policy

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Approval Signature	

Confidentiality Policy

EnviroSense Futures Limited treats all information obtained or created during its validation and verification activities as private and confidential. This policy sets out how we meet that commitment and how it satisfies the confidentiality requirements of ISO/IEC 17029:2019 as the validation/verification body's own management-system policy on confidentiality.

1. Purpose and Scope

This policy implements ISO/IEC 17029:2019 Clause 4.3.3 (Confidentiality, one of the core principles for validation/verification bodies) and Clause 10.4 (Confidentiality, the detailed information requirement). It applies to all information obtained or created during EnviroSense's validation and verification activities, and to everyone who may access it: employees, directors, Impartiality Committee members (OP-008), contractors, and any body or individual to which activities are outsourced or subcontracted.

2. Our Commitments

2.1 Confidentiality as a core principle (Clause 4.3.3)

Confidential information obtained or created during our validation/verification activities is safeguarded and is not inappropriately disclosed. This principle applies throughout every stage of an engagement, from initial enquiry (OP-001) through to post-issuance (OP-005), and to the operation of the management system as a whole (OP-007).

2.2 What we treat as confidential (Clause 10.4.3)

Except for information that a client makes publicly available itself, or information we and the client have specifically agreed may be shared, all information obtained or created in the course of an engagement is treated as the client's proprietary and confidential information by default. No separate confidentiality request from the client is required for this default to apply.

2.3 Legally enforceable confidentiality undertakings (Clause 10.4.1)

EnviroSense is responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of validation/verification activities. This includes the engagement acceptance documentation completed under OP-001 and the personnel and subcontractor undertakings described in Sections 2.7 and 2.8 below.

2.4 Advance notice before anything enters the public domain (Clause 10.4.2)

Where EnviroSense intends to place any information relating to a client or an engagement into the public domain, the client is informed of exactly what is intended to be disclosed in advance of that disclosure taking place.

2.5 Disclosure required by law (Clause 10.4.4)

We will not share confidential information with external parties without the client's consent, unless the client has already made that information publicly available. Where EnviroSense is required by law, or authorised by contractual arrangement, to release confidential information, the client (or the individual concerned) will be notified of the information released, unless we are prohibited by law from doing so.

2.6 Information about a client from other sources (Clause 10.4.5)

Information about a client that we obtain from a source other than the client itself — for example a complainant, a regulator, or another interested party — is kept confidential between that source and EnviroSense. The identity of the source is not shared with the client unless the source has agreed to this. This applies in particular to information handled under our complaints and appeals process (OP-007 §8; OPD-007.5).

2.7 Personnel, committee members, contractors and subcontracted bodies (Clauses 7.2.6 and 7.4)

All personnel — including any committee members (such as the OP-008 Impartiality Committee), contractors, personnel of external bodies, or any individual acting on EnviroSense's behalf — must keep confidential all information obtained or created during the performance of validation/verification activities. This undertaking is captured as part of personnel authorisation under OP-006 and its competence records (OPD-006.1). Where validation/verification activities are outsourced or subcontracted, the agreement with the outsourced body must itself include confidentiality requirements, and EnviroSense confirms that the receiving body's own arrangements meet an equivalent standard before relying on them.

2.8 Secure handling, storage and transmission of records (Clauses 9.11.2 and 11.6.1(b))

Validation/verification records are maintained securely and confidentially, including during their transport, transmission or transfer between personnel, EnviroSense systems, or a client. Documented information generally is adequately protected from loss of confidentiality, improper use, or loss of integrity, in line with the document and record controls set out in OP-007 (e.g. the Evidence Register and file-review records at OPD-007.13).

3. Implementation and Accountability

Our team is responsible for ensuring the implementation and enforcement of this Confidentiality Policy. The policy is reviewed annually as part of management review (OP-007 §10), or sooner if a confidentiality breach or near-miss is identified. Any suspected breach of confidentiality is raised and tracked as a nonconformity under OP-007's Internal Management System NCP Register (OPD-007.07) and, where it involves a threat to impartiality, is also assessed under OP-008.

4. Related Documents

- D.DMS-002 — ISO 17029 Management System Manual
- OP-001 — Enquiry to Workbook Completion Procedure (engagement acceptance documentation)
- OP-006 / OPD-006.1 — Competence & Authorisation Procedure and Competency & Experience Matrix (personnel undertakings)
- OP-007 §8 / OPD-007.5 — Complaints & Appeals Register
- OP-007 §9 / OPD-007.07 — Internal Management System NCP Register (breach handling)
- OP-007 §11 / OPD-007.13 — Verification Engagement File Review (secure record-keeping)
- OP-008 — Impartiality Procedure

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5. ISO/IEC 17029:2019 Clause Cross-Reference

This section provides the explicit clause citations for the commitments set out above.

Clause	Requirement	Addressed in
4.3.3	Confidentiality (principle)	Section 2.1
10.4.1	Legally enforceable confidentiality agreements	Section 2.3
10.4.2	Advance notice before public disclosure	Section 2.4
10.4.3	Proprietary/confidential information (default treatment)	Section 2.2
10.4.4	Legally required disclosure, with notification	Section 2.5
10.4.5	Confidentiality of third-party-sourced client information	Section 2.6
7.2.6	Personnel confidentiality undertaking	Section 2.7
7.4 (c)(d)	Confidentiality in outsourcing/subcontracting agreements	Section 2.7
9.11.2	Secure and confidential handling of records	Section 2.8
11.6.1 (b)	Documented information protected from loss of confidentiality	Section 2.8

Version 2 (16 08 2026): expanded from a two-paragraph policy to explicitly address ISO/IEC 17029:2019 Clauses 4.3.3, 7.2.6, 7.4(c)(d), 9.11.2, 10.4.1–10.4.5 and 11.6.1(b), and added an explicit clause cross-reference. The original version 1 text (client-consent disclosure and legally-required-disclosure notification) is retained in Section 2.5 above.