IGS-C Conflict-of-Interest Policy

Document type: Governance / ethics policy
Edition: 1.3 – Nov 2025
Status: Published
Audience: IGS-C officers, committee members, assessors, trainers, accredited organisations, regional bodies

---

1. Purpose

This policy defines how **conflicts of interest** are identified, disclosed and managed within IGS-C and its ecosystem.

Objectives:

- Protect the **independence and credibility** of IGS-C standards, assessments and certifications;

- Prevent vendor, regional or political **capture**;

- Give regulators, clients and the public **transparent rules** they can test and question.

This policy applies to:

- Members of governance bodies (General Assembly, Steering Committee, Technical Committees, Conformance Board);

- Accredited assessors, trainers and certification bodies;

- Regional profile editors (e.g. PASC for OSPCRM);

- Staff and contractors who support IGS-C operations.

---

2. Definition of conflict of interest

A **conflict of interest** arises when an individual's or organisation's **personal, financial or institutional interests** could reasonably be seen to:

- Influence their judgement or actions in IGS-C activities; or

- Undermine trust in the impartiality of IGS-C decisions or assessments.

Conflicts can be:

- **Actual:** the interest is currently influencing behaviour;

- **Potential:** the interest might influence future behaviour in reasonably foreseeable circumstances;

- **Perceived:** an external observer could reasonably believe there is influence, even if none exists in fact.

IGS-C treats **perceived conflicts** seriously, because trust in the system depends on perception as much as on intent.

---

3. Typical situations

Non-exhaustive examples include:

1. **Vendor and product interests**

   - A committee member is an employee, shareholder or advisor to a vendor whose solution is under evaluation for IGS-C compatibility or certification.

   - An assessor's firm sells consulting or technology services competing with those being evaluated.

2. **Commercial relationships with assessed entities**

   - An accredited assessor or certification body receives significant revenue from the organisation it is assessing.

   - An assessor is involved in designing or implementing the very controls and architectures they are now being asked to certify (beyond acceptable "design–assess separation").

3. **Regional or political pressure**

   - A representative is under pressure from a specific government, regional bloc or political actor to favour or obstruct a profile, standard or certification decision.

- ○ A member is part of a lobbying group that has a direct stake in the outcome of IGS-C work (e.g. cloud providers, large banks).

4. **Personal relationships**

- ○ Close family, romantic or long-standing business relationships with key decision-makers in assessed entities or vendors.

- ○ Situations where personal loyalties may be reasonably expected to bias decisions.

---

4. Disclosure obligations

4.1 Who must disclose

All individuals in the following roles must **proactively disclose** relevant interests:

- Members of the Steering Committee, Technical Committees and Conformance Board;

- Accredited assessors, trainers and certification bodies;

- Regional editors of profiles (e.g. PASC for OSPCRM);

- Any staff or contractor materially involved in assessment or certification decisions.

4.2 What must be disclosed

Examples of interests that should be declared:

- Employment, board memberships, advisory roles;

- Equity holdings above a defined threshold (e.g. >1% or material to personal wealth);

- Significant commercial relationships (e.g. major client or supplier status);

- Ongoing or recent (last 24 months) consulting assignments for entities likely to be assessed;

- Any other circumstances that a reasonable observer might view as compromising impartiality.

Disclosures are recorded in a **confidential register** maintained by the secretariat, with a **public summary** where appropriate (e.g. "X is an employee of Y vendor").

---

5. Management of conflicts

5.1 Proportionality

Not all conflicts require the same response. IGS-C applies **proportionate measures**, which may include:

- **Disclosure only** – where the risk is low and transparency is sufficient;

- **Partial recusal** – the individual may participate in discussions but not in final decisions;

- **Full recusal** – the individual withdraws from both discussion and decision;

- **Exclusion from specific roles** – in severe or repeated cases.

5.2 Committee decisions

Chairs of committees are responsible for:

- Ensuring that conflicts are disclosed at the start of relevant discussions;

- Proposing an appropriate management measure (disclosure, recusal, etc.);

- Recording the decision in the minutes.

In case of disagreement or ambiguity, the matter may be escalated to the **Steering Committee** or the **Conformance Board** for a binding decision.

5.3 Assessments and certifications

For assessments and certifications:

- An assessor or certification body must **not** lead or participate in a certification engagement where they:

  - designed the architecture under review; or

  - stand to receive substantial commercial benefit from a positive outcome, beyond normal professional fees.

- Where complete independence is not practicable (e.g. in small markets), IGS-C may allow **controlled internal use** of GCR-M/OSPCRM (e.g. internal audits) but not public use of phrases such as "IGS-C Level 3 certified" unless an independent body is involved.

---

6. Enforcement and consequences

6.1 Investigation

Alleged breaches of this policy may be reported to:

- The relevant committee chair;

- The IGS-C secretariat; or

- A dedicated ethics contact (if established).

Reports can be made **confidentially** and, where permitted by law, anonymously. The secretariat (or an appointed sub-group) will:

- Acknowledge receipt;

- Investigate facts;

- Give the implicated person an opportunity to respond.

6.2 Possible outcomes

Depending on severity and frequency, outcomes may include:

- No action (if no conflict or breach is found);

- Reminder or formal warning;

- Temporary or permanent **removal from committees**;

- Suspension or revocation of **accreditation** (assessor, trainer, certification body);

- Public clarification to correct misleading perceptions;

- In extreme cases, legal action if fraud or serious misrepresentation is involved.

6.3 Registry notes

Where a breach leads to suspension or revocation of accreditation or certification:

- A note is added to the **public registry** indicating the status change (e.g. "Suspended – conflict-of-interest breach, under review");

- Specific details are included only where legally and ethically appropriate, balancing transparency and privacy.

---

7. Anticipated questions and concerns

7.1 "Is this designed to exclude vendors or auditors from participating?"

By design, no. Vendors, auditors and consultants are **essential** to IGS-C's work. The policy:

- Allows their participation;

- Requires transparency about where interests lie;

- Ensures those interests are managed, not ignored.

7.2 "Won't this make it impossible in small markets to find 'independent' assessors?"

The policy recognises constraints in **smaller or emerging markets**:

- It允许 (allows) internal or semi-independent assessments for internal use;

- For **public certifications**, a minimum level of independence is non-negotiable;

- Regional cooperation and cross-border assessor pools are encouraged to mitigate local concentration.

7.3 "Can regulators still participate if they supervise entities in scope?"

Yes. Regulators are encouraged to participate:

- Their statutory role is understood and **not treated as a conflict**;

- However, if a regulator is directly involved in supervising a specific entity and also sits on a decision about that entity's IGS-C certification, they may be asked to **abstain**

from the final vote to avoid perception of undue pressure.

7.4 "Is this policy biased against Global South vendors or institutions?"

The policy is **neutral with respect to geography**. Its aim is to:

- Protect users and regulators from hidden interests;

- Prevent both Global North and Global South actors from capturing the process;

- Ensure that African, Latin American, Asian and other regional bodies can trust that standards are not controlled by a single bloc.

End of Conflict-of-Interest Policy.