Conflict of Interest and Recusal Policy

Reference: GCSB-POL-003
Version: 1.5
Issuing authority: Global Converged Security Board
Effective: 13 October 2026

1. Scope

This Policy applies to every GCSB office holder, board, committee and panel member, External Examiner, Journal editor and peer reviewer.

2. What counts as a conflict

A conflict exists where a person's private, professional, financial, family or close personal interest could influence - or could reasonably be seen to influence - a decision they take for GCSB. This includes:

- deciding on a candidate, partner, appeal or paper connected to themselves;
- deciding on the appointment or work of a family member or close personal contact;
- any involvement in delivering a programme they assess;
- ownership, control, employment or commercial involvement in a provider whose recognition, licence, assessment or award is being considered.

3. Declarations

1. Every person declares their interests on appointment.
2. Declarations are renewed every year.
3. A new interest is declared as soon as it arises, and before any related decision.
4. Peer reviewers declare that they have no conflict before each review.

4. Recusal

A person with a conflict takes no part in the discussion, the decision or the vote on that matter. The recusal is recorded.

The conflicted person does not select independent decision-makers for the affected matter. Final assessment, credential, Trustmark Award and appeal decisions remain with eligible independent GCSB bodies. Where independent capacity is unavailable, the affected decision is deferred and recorded, not overridden by founder or corporate authority. Related-party arrangements also follow GCSB-POL-007.

5. Connected persons

Where a candidate for any role has a family or close personal connection to a GCSB office holder:

1. the connected office holder takes no part in the appointment;
2. the appointment must be approved by an independent reviewer;
3. the connection is publicly declared;
4. the appointee does not review or vote on the connected person's work;

5. the appointee cannot be dismissed or penalised without independent review;
6. the appointee renews the declaration every year, including any limits arising from other employment.

6. Journal-specific rules

Authors may not act as editor or reviewer of their own papers. Editors do not review papers they handle. These rules are enforced by the Journal portal and cannot be overridden.

7. Organisational Trustmark step-aside rule

1. Who must step aside. Any GCSB office holder, Assessment Board member or reviewer who owns, leads, works for, teaches for or has a commercial link with a training, advisory or other provider (including Converged Security Institute) must step aside from any Organisational Trustmark matter concerning an organisation that the provider has trained, advised or contracted with in the previous 36 months.
2. Disclosure first. Applicants must declare any such relationship on the application form. Office holders must declare it as soon as they become aware of it.
3. What stepping aside means. The person takes no part in the review, scoring, tier decision, award-fee request, appeal or certificate issue, receives no assessment papers for that matter, and does not choose who decides instead.
4. Who decides instead. The Assessment Board decides through its independent members. If fewer than two independent members are available, the matter is deferred and recorded until independent capacity exists; it is never decided by founder or corporate authority.
5. Certificates. Where the President & Chair has stepped aside, the certificate is still issued in the approved design, and the register record notes that the decision was taken by independent members.
6. Record. Every step-aside is recorded with the date, the person, the reason and who decided instead. The record is kept privately and is available to the Governing Council.
7. No benefit. No provider may state or imply that its training or advice leads to, speeds up or improves an Organisational Trustmark outcome.

8. Registered External Auditors

1. Every GCSB-Registered External Auditor (GCSB-EA) signs a declaration of independence and interests on registration and renews it every year with their registration.
2. Before each engagement, the auditor signs an independence agreement with the client organisation confirming they hold no GCSB office and have no link with GCSB, Converged Security Institute or any accredited provider that could affect the engagement.
3. Independence window. An auditor takes no part in reviewing an organisation where the auditor, or a provider they are linked with, has trained, advised, implemented for, employed or contracted with that organisation or its Implementation Partner in the 36 months before the review. The auditor must not take on any such work with that organisation or its Implementation Partner for 24 months after the review.
4. Never implement. An auditor may never act as Implementation Partner for an organisation they examine.

5. Recommend only. The auditor sends a signed evidence report and recommendation to the Board within 15 business days of the closing meeting. The auditor never awards, never states an outcome to the client and never decides a tier; the Board decides.
6. No inducements. An auditor accepts no gifts, success fees or rewards linked to any outcome.
7. An auditor who cannot act independently on an engagement must decline it and record the decline with GCSB.
8. A breach of this section, including an undeclared conflict, voids the affected review and is grounds for suspension or withdrawal of registration, decided by independent Assessment Board members.

9. Breaches

A failure to declare or recuse is referred to the Ethics, Conduct & Appeals Committee. Decisions affected by an undeclared conflict may be re-taken.

10. Document control

Policy authority: Governing Council. Effective date: 13 October 2026. Version 1.1 adds connected-provider screening, independent decisions and deferral safeguards. Version 1.3 adds the Organisational Trustmark step-aside rule. Version 1.4 adds the Registered External Auditor independence rules. Version 1.5 adds the 24-month post-review restriction and the never-implement, recommend-only, reporting and no-inducement duties for Registered External Auditors, aligned with the Organisational Trustmark party bundles. Review at least annually and whenever governance arrangements change.

11. Policy control

- Approval authority: Governing Council.
- Revision history: version 1.0 (13 October 2026) first issue; version 1.1 added connected-provider screening, independent decisions and deferral safeguards; version 1.2 added the Policy control section; version 1.3 (15 October 2026) adds the Organisational Trustmark step-aside rule, approved by Prof. Dr. Vladimir Bunic; version 1.4 (15 October 2026) adds the Registered External Auditor independence rules, approved by Prof. Dr. Vladimir Bunic.
- Review date: reviewed at least once a year; next review no later than 13 October 2027, and whenever governance arrangements change.
- Precedence: subordinate to the Governance Charter (GCSB-POL-001). Related-party matters are also governed by GCSB-POL-007; where the two overlap, the stricter safeguard applies.

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