

## INFORMATION SYSTEMS SECURITY ASSOCIATION (ISSA) POLICIES AND PROCEDURES

### Ethics Complaint Review Process

#### Intent

As an association of information security professionals, ISSA encourages its members to act in an ethical fashion for the benefit of the profession, the companies to whom we provide professional services, and the public, as outlined in the [Association Code of Ethics](#). The defined process provides a mechanism for confidentially and fairly reviewing situations in which members are accused of failing to uphold this standard.

#### Policy

It is the responsibility of the ISSA Ethics Committee to review and act upon complaints of ethics violations on the part of its members when they cannot be resolved at the local chapter level. We recommend members reach out to chapter leadership before submitting an ethics complaint to see if the matter can be resolved amicably. The Ethics Committee does not investigate complaints, it reviews and makes recommendations to the ISSA International Board. Legal matters should be directed to the appropriate authorities.

#### Independence

ISSA Ethics Committee and International Board members are not permitted to be a part of any ethics complaint where there may be a conflict of interest.

- Ethics Committee and Board members will recuse themselves from the review process if there is any appearance of or actual conflict of interest.
- No Ethics Committee member or Board member should participate in handling an alleged ethics complaint in any way prior to the formal receipt of such a complaint.

#### Ethics Disclaimer

The Ethics Committee only handles ethics issues within its jurisdiction as defined by the association's bylaws and the Ethics Committee Charter. If a member has a chapter issue outside of the Ethics Committee purview, they should get in touch with the relevant legal and government agencies. The association is not responsible for handling or providing advice on such matters beyond the scope of its defined responsibilities.

Prior to ethics submissions, members will be responsible for reviewing a disclaimer that will inform them to review and acknowledge ISSA Ethics Policy and the ISSA Ethics Complaint Guidelines before submitting a complaint. This brief disclaimer will also outline our commitment to ethical conduct and the expectations for transparency, respect, honesty, and privacy in the process, emphasizing that violations may result in submission rejection.

## **Complaint Submission**

Any current ISSA member may submit an Ethics complaint about another ISSA member via the electronic submission process on the ISSA website. The complaint must include the following:

1. Acceptance of the Disclaimer
2. A description of the circumstances around the complaint
3. The section(s) of the ISSA Code of Ethics that was violated
4. Any supporting information or evidence
5. Names and contact information of those involved and those familiar with the incident

The complaint will be assigned to an Ethics Review Board as outlined below. Once a completed form has been received and acknowledged, the complaint will be handled expeditiously.

The ISSA Ethics Committee does not condone retaliation by a member involved in a complaint against another member. Retaliation to a good faith ethics complaint constitutes a violation of the ISSA Code of Ethics.

## **Notice and Opportunity to Reply**

If the information supporting the complaint is deemed to be sufficient for formal review, the parties will be informed electronically, which shall generally be in the form of Appendix B. The subject of the complaint (Subject) will be given 30-days to reply to the complaint and to submit all evidence and pertinent information they have in support of their position.

If no reply is received, the committee will understand that the complaint is valid, and the Subject member has waived all objections to the proceedings and action. The Ethics Committee will move to determine if and what actions are appropriate. The Subject party shall be notified in the Notice of Formal Review of the consequences of failing to reply and to participate in the Hearing, if any. If a reply is received, a hearing will be scheduled involving an Ethics Review Board and the parties to the complaint.

## **Mediator**

The Ethics Committee may request that a Mediator invite the Subject and complainant to alternatively resolve the issue. The Mediator will be a neutral member selected from the ISSA International Board.

## **Review**

At its next monthly meeting, the Ethics Committee will review the complaint. Any committee member who is involved in or has ties to those involved in the complaint will recuse themselves from the discussion.

If the committee determines that additional information or evidence is required from either the complainant or the Subject member, the parties involved will be informed.

If the complaint is deemed worthy of review, the parties will be notified. The Subject member will be given 30 days to reply in writing to the complaint.

If no reply is received, the committee will assume that the complaint is valid and will move to recommend appropriate action.

If a reply is received, a hearing will be scheduled involving an Ethics Review Board and the parties to the complaint.

### **Hearing**

An Ethics Review Board will be impaneled consisting of:

- Four (4) members of the Ethics Committee (Voting members); one of which will serve as review lead.
- One (1) ISSA International Board member (Voting member)
- The Association legal resource (non-voting member) if needed

Both the subject and the complainant will be required to attend a conference call with the Review Board to discuss the complaint. Both sides will be permitted to express their views of the situation.

### **Decision**

At the close of discussion, the parties to the dispute will be asked to drop off the conference call. The Review Board members will then discuss the situation and attempt to reach a decision. A majority (3/5 – 3 members) affirmative vote is required within the Review Board to find a member guilty of an ethics violation.

If the member is found in violation of the code of ethics, the Review Board will advise the International Board that an ethics violation occurred. The Review Board will formally notify the International Board of its recommendation of action through a report giving a summary of known facts, the findings. The International Board will determine the appropriate action up to and including probation and or expulsion from a chapter or membership in ISSA International. The parties will be notified by ISSA International.

### **Confidentiality**

Decisions involving membership and ethics violations are private matters between the Association and the members involved. No details of the decision will be communicated to any third party by any member involved. Any member not adhering to this restriction could be found in violation of the Association's Code of Ethics.

A summary of all ethics complaints will be prepared without specific names for the Director of Operations to present at the next ISSA International Board Meeting. A finding will be communicated to the ISSA International Board in detail along with recommended action.

### **Appeal**

The subject member, if found in violation, may file an appeal to the International Board within 30 days of the notice of decision. Failure to appeal will indicate consent to the decision. Such an appeal may question only whether the proper procedures were followed, and if the action was suitable for the offense. The International Board will review the materials provided by the Review Board and will determine if the proper guidelines and procedures have been followed. The Board will notify the parties involved.

### **Recording the Decision**

The Executive Director is responsible for recording the decision and taking any steps required to implement the decision.

### **Review of Membership Applications**

New and renewing membership applications will be reviewed by the Executive Director to ensure that those previously found in violation of offenses are not readmitted.

### **Periodic Policy Review**

The Committee will periodically review the ethics review guidelines, and the decisions handed down to ensure the process is appropriate and fair.

## Appendix A Sample Notification Letter/Email

[DATE]

To: [Accuser / Accuse]:

The Information Systems Security Association, Inc. (ISSA) Ethics Committee has received [your complaint or a complaint against you] (copy attached) concerning activities that area alleged to have violated the Association Code of Ethics.

The ISSA Ethics Committee is committed to enforcing the ISSA Code of Ethics and Review procedures as contained in the ISSA Operations Manual. As a member of the Association, you agreed to abide by the Association Code of Ethics when you joined. The Code of Ethics is online (<https://www.issa.org/issa-code-of-ethics/>) for your review. It states the following:

*The primary goal of the Information Systems Security Association, Inc. (ISSA) is to promote practices that will ensure the confidentiality, integrity, and availability of organizational information resources. To achieve this goal, members of the Association must reflect on the highest standards of ethical conduct. Therefore, ISSA has established the following Code of Ethics and requires its observance as a prerequisite for continued membership and affiliation with the Association.*

*As an applicant for membership and as a member of ISSA, I have in the past and will in the future:*

- Perform all professional activities and duties in accordance with all applicable laws and the highest ethical principles;*
- Promote generally accepted information security current best practices and standards;*
- Maintain appropriate confidentiality of proprietary or otherwise sensitive information encountered during professional activities;*
- Discharge professional responsibilities with diligence and honesty;*
- Refrain from any activities which might constitute a conflict of interest or otherwise damage the reputation of employers, the information security profession, or the Association; and*
- Not intentionally injure or impugn the professional reputation or practice of colleagues, clients, or employers.*

The ISSA Ethics Review Board will convene to consider the complaint, its allegations, and pertinent information concerning this potential violation of the ISSA Code of Ethics. The board will report a finding with a recommendation to the ISSA International Board at the review's end. You will be informed of the next steps by the ISSA International Board. An appeal may be made in writing to the ISSA International Board within 30 days.

Please read the following page to understand the process and actions requested from you.

ISSA International, Inc.

Please direct questions or concerns about this process to [Ethics@ISSA.org](mailto:Ethics@ISSA.org) no later than **[14 days from date letter]**

The Ethics Review Board members have been called upon to participate in this hearing. This board is constituted from the standing ISSA Ethics Committee. The names of these board members will be sent to you in a separate communication. They will be reviewing the complaint and all information presented.

If you feel any of these members may be unable to fairly and objectively review and take action with respect to this matter, please forward in writing and identification of such individual(s) with a written explanation as to why the individual(s) is or are in your opinion unsuited to review this matter. Such objections should be received by no later than 5:00 PM ET, **[Date 21 days prior to date of hearing below]**

We request you share your perspective, answer questions, and provide additional information via a written statement with additional supporting material to aid the hearing to [Ethics@ISSA.org](mailto:Ethics@ISSA.org). In addition, any statements made by their parties should be submitted not later than **[Date 7 days prior to hearing date below]**

We have scheduled a hearing time on **[Date of Review]** based on current scheduling availability. Your presence is requested.

If (a) you choose not to appear or to present evidence regarding the complaint and information contained in the file, or (b) you choose not to appeal to the ISSA International Board, it will be understood that you agree with and waive any and all objections to these proceedings and any action that may be taken.

This process should be treated with utmost confidentiality. Please be advised that disclosure of the information contained in this letter and process to those uninvolved will be considered an ethics violation.

Respectfully,

Ethics Review Board  
Information Systems Security Association

**This is an internal form that will be the way members submitted ethics complaints online.**

**ISSA Ethics Complaint**

**This form needs to be created online via a form**

**SUBMITTED BY:**

Name: \_\_\_\_\_  
 Email Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**ACCUSED:**

Name: \_\_\_\_\_  
 Email Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**[+Add another to person]** This should be a button to add more

**Detailed Description of Alleged Violation**

\_\_\_\_\_  
 \_\_\_\_\_

**Section of ISSA Code of Ethics Violated**

\_\_\_\_\_  
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**Sources of Information (and corresponding contact information)**

\_\_\_\_\_

ISSA



Operations Manual

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