



IRAP conflict of interest policy

1. IRAP assessors are often entrusted to sensitive information. Additionally, they may be responsible for contributing toward the information security of a Government entity. It is therefore critical that ASD is aware of any potential conflicts of interest to maintain a high level of confidence and trust in IRAP assessors.
2. The following requirements exist in relation to declaring potential conflicts of interest:
 - a) Upon engagement, IRAP assessors must submit an IRAP Assessment Record and attached conflict of interest declaration in the Partner Portal – at least 7 days before undertaking each IRAP assessment, and update during the assessment as soon as any conflict becomes apparent.
 - b) An IRAP assessment may not proceed if a related conflict of interest is under review by ASD.
3. ASD will manage all conflict of interest declaration submissions and if required, will send notification that further review and/or information is required relating to a declared conflict, or notify that mitigations are unsatisfactory and the assessment needs to be handed over to an alternate assessor.
4. Conflicts of interest can be edited at any time during an assessment so long as the record is 'open'.
5. Conflict of interest circumstances are those which affect an IRAP assessor's ability to perform their work or fulfil their responsibilities with impartiality. Circumstances that might influence the IRAP assessor's provision of services includes:
 - a) personal relationships
 - b) interests, or
 - c) corporate affiliations.
6. It is also considered a conflict of interest, should an IRAP assessment be performed on a system where the IRAP assessor, or another party (with a personal relationship, interest or corporate affiliation to the IRAP assessor) has direct influence over the system. This influence includes but is not limited to the development, ownership or update of system components, documentation, mitigation advice, or implementation guidance they may have taken upon the system. This applies even if the work was completed through a separate reporting structure, difference in physical locations, or point in time in which those activities were undertaken.
7. This includes situations involving two parties that are related by corporate mergers, takeovers, subsidiaries or any other affiliation where they are ultimately owned by the same

parent organisation, or where staff are employed by both parties. Customers should consider potential conflicts of interest before engaging an IRAP assessor, particularly if they will be assessing a system that has been outsourced or shaped by an external party.

8. ASD takes any real, potential or apparent conflicts of interest seriously and will handle all declarations with sensitivity. ASD will review a sample of declarations to provide assurance that conflicts of interest are being managed appropriately, ethically and that the independence of the program is being maintained. No further action may be undertaken by the IRAP Assessor until the conflict of interest has been discussed and resolved with ASD.
9. The non-declaration of a conflict of interest reflects a poor compliance culture and is a breach of the conditions of IRAP membership, and may result in removal from the program. Conflicts of interest must also be declared by any secondary assessors involved with an IRAP assessment.

Definitions:

(a) Real – where a direct conflict exists between current IRAP duties and existing personal interests;

(b) Potential – where personal interests do not, but could, come into direct conflict with IRAP duties; and

(c) Apparent – where a third party could reasonably perceive that an IRAP assessor's personal interest may influence the performance of their IRAP duties, now or in the future. This can occur whether there is a conflict or not.

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