



Cyber Certified Experts (CCE)[®] Program

Ethics Complaint Review Process



**CYBER CERTIFIED
EXPERTS PROGRAM**

© Lunarline, Inc. All rights reserved.

All printed copies, and all electronic copies and versions except the one accessible on the School of Cybersecurity website are considered uncontrolled copies used for reference only.

Table of Contents

| | | |
|------|---|---|
| 1.0 | Overview | 3 |
| 2.0 | Independence | 3 |
| 3.0 | Complaint Submission | 3 |
| 3.1. | Notice and Opportunity to Reply | 4 |
| 3.2. | Mediator | 4 |
| 3.3. | Review | 4 |
| 3.4. | Decision | 4 |
| 4.0 | Confidentiality | 5 |
| 5.0 | Appeal | 5 |
| 6.0 | Recording | 5 |
| 7.0 | Review of Applicants | 5 |
| 8.0 | Periodic Review | 5 |
| | Appendix A – Ethics Complaint Form | 6 |
| | Appendix B – Sample Notification Letter | 7 |
| | Revision History Table | 9 |

1.0 Overview

The Cyber Certified Experts (CCE) Program's **Code of Ethics** is designed to represent a commitment to our cyber industry and to each other, a group of unique cyber security professionals with skills and desire to serve in protecting cyberspace and a higher posture of professionalism. To achieve this goal, the following Code of Ethics is required as a prerequisite for continued affiliation with the CCE Program.

- 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 in the course of 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 or is detrimental to employers, the information security profession, or the CCE Program; and
- Not intentionally injure or impugn the professional reputation or practice of colleagues, clients, or employers.

All CCE Program committee members, volunteers, certification applicants, candidates and certificants must comply with the Code.

2.0 Independence

The certification body's Ethics Committee members are not permitted to be a part of any ethics violation incident they will be responsible for reviewing. Any member who is so involved will recuse him/herself from the review process. No Committee member should participate in an alleged incident **in any way** prior to the receipt of a formal complaint.

Investigation and decision on appeals will not result in any discriminatory actions.

3.0 Complaint Submission

Any person may submit a complaint to the certification body about a committee member, volunteer, applicant, or certificate holder online at <https://www.jotform.com/CCEProgram/file-new-ethics-complaint> (preferred) or via email at CB@lunarline.com. When emailing, the complaint must include the following at a minimum and follow the format of the **Ethics Complaint Form** (Attachment A):

1. The section of the ethical code that was violated
2. A narrative description of the circumstances around the complaint
3. Names and contact information of those involved and those familiar with the incident
4. Any supporting information or evidence

The complaint will be forwarded to an assigned Ethics Committee member for review. Once a completed form has been received and acknowledged, the complaint will be placed on the Ethics Committee Agenda within thirty 30 days. In case of sensitive timing concerns, an Emergency Meeting may be convened.

3.1. Notice and Opportunity to Reply

If the information supporting the complaint is deemed to be sufficient for formal review, the parties will be informed via email or registered mail, which notice shall be generally in the form of **Appendix B - Sample Notification Letter**. The charged member will be given 30 days to reply in writing to cb@lunarline.com to the complaint and to submit in writing any and all evidence and information he/she may have in support of their position. Effort will be made to obtain objective written or tangible evidence for inclusion in the record and to obtain additional pertinent information concerning the complaint.

If no reply is received, the committee will understand that the charges are valid, and the charged member has waived all objection to the proceedings and action. The Ethics Committee will move to determine if and what sanction is appropriate. The charged party shall be notified of the consequences of failing to reply. If a reply is received, a hearing will be scheduled involving an Ethics Committee and the parties to the complaint.

3.2. Mediator

The Ethics Committee may request that a Mediator invites the charged individual and complainant to alternatively resolve the issue. The Mediator will be a neutral member selected from the Ethics Committee.

3.3. Review

Within 30 days or receipt, the Ethics Committee will discuss the complaint. Any committee member who is involved in or has ties to those involved in the complaint will absent himself or herself from the discussion.

If the committee determines that additional information or evidence is required from either the complainant or the charged member, the involved parties will be informed. If the complaint is deemed to be without merit, the charges will be denied, and the parties involved will be so informed.

If the complaint is deemed to be worthy of review, the parties will be notified. In a case where timing is crucial, parties will be informed via email. The charged member will be given 30 days to reply in writing to the complaint. If no reply is received, the committee will assume that the charges are valid, and will move to implement an appropriate penalty.

If a reply is received, a hearing will be scheduled involving an Ethics Committee and the parties to the complaint. Both the charged individual and the complainant will be required to attend a conference call with the Ethics Committee to discuss the charges. Both sides will be permitted to express their views of the situation.

3.4. Decision

At the close of discussion, the parties to the dispute will be asked to drop from the conference call. The Ethics Committee will then discuss the situation and attempt to reach a decision. If the Certificant is found guilty of an ethics violation, the Ethics Committee will consider an appropriate penalty based upon the severity of the offense.

Penalties may include:

- Written reprimand
- 1-year probation

- Reduction of certification to Associate -level
- Expulsion from CCE Program

The parties will be notified by registered mail of the decision.

4.0 Confidentiality

Decisions involving membership and ethics violations are private matters between Lunarline and the members involved. No details of the decision will be communicated to any third party by any member involved in the decision. Any member violating this restriction will be charged for violating the Code of Ethics.

5.0 Appeal

The charged member, if found guilty, may file an appeal within 60 days of the notice of decision. Failure to appeal will indicate consent to the decision. Such appeal may question only whether the proper procedures were followed, and if the penalty was suitable to the offense. Members of the Ethics Committee that are different than those who were involved in the decision will review the materials provided and will determine if the proper guidelines and procedures have been followed. The Board will notify the parties involved within 30 days or receipt.

6.0 Recording

The Director of Certifications is responsible to ensure the decision is recorded, and with performing any steps required to implement the decision.

7.0 Review of Applicants

The Certification Board reviews new and renewing individuals against the filed records to ensure that those previously convicted of offenses are handled correctly.

8.0 Periodic Review

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

Appendix A – Ethics Complaint Form

Date

SUBMITTED BY

Name

Company

Email

Phone

External Mailing Address

ACCUSED

Name

Company

Email

Phone

External Mailing Address

Section of CCE Program Code of Ethics Violated

Sources of Information (and corresponding contact information)

Detailed Description of Complaint (use as much space as needed)

Please attach all supporting evidence and email to CB@lunarline.com.

Appendix B – Sample Notification Letter

[Date]

Dear [Certificant]:

The Lunarline Cyber Certified Experts (CCE)® Program’s certification body is committed to enforcing the CCE® Program’s Code of Ethics and Review procedures as contained in the Certification Holder Policies and Guidelines. As a certification holder, you agree to abide by the Code of Ethics, as noted below and online for your review.

*The Cyber Certified Experts (CCE) Program’s **Code of Ethics** is designed to represent a commitment to our cyber industry and to each other, a group of unique cyber security professionals with skills and desire to serve in protecting cyberspace and a higher posture of professionalism. To achieve this goal, the following Code of Ethics is required as a prerequisite for continued affiliation with the CCE Program.*

- *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 in the course of 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 or is detrimental to employers, the information security profession, or the CCE Program; and*
- *Not intentionally injure or impugn the professional reputation or practice of colleagues, clients, or employers.*

The certification body has received a written complaint concerning activities on your part that are alleged to have violated the Code of Ethics. Additional information concerning this alleged violation has also been placed in a file with Lunarline. Attached is a copy of that complaint and information contained in the file.

The certification body’s Ethics Committee will convene to consider the complaint, its allegations and pertinent information concerning this potential violation of the Code of Ethics by teleconference on (date). The Ethics Committee will serve as a fact-finding and decision-making body to determine if there is evidence of a violation of the Code of Ethics and to determine if action should be taken. You will be informed of the decision.

An appeal of the Ethics Committee finding and recommendation, allowing for procedural corrections only, for the record and not a rehearing, may be made in writing within 60 days of the date of a report from the Ethics Committee being mailed to you. At the end of that 60-day period the Ethics Committee will review the report and any appeal which may be filed.

If you or a representative would like to present evidence by teleconference or otherwise as may be scheduled by the Ethics Committee, you must send written notice of this fact and identification of who will attend or participate to the Certification Board at CB@lunarline.com no later than 5 p.m. ET, (date). If by representative, please identify this representative by name, title and contact information (either home or business address and email address). You will be assigned a scheduled hearing time on (date)

based on current scheduling availability. If you or a representative will not be attending or participating in person and would like to submit written evidence or a written statement only, it must be submitted and received by 5 p.m. ET, **(date)**.

Attached please also find **a listing of Ethics Committee members** and others who may be called upon to participate. The members will be selected from this list of persons. They will be reviewing the complaint and all information in the file. If there are members of the Ethics Committee or others who may participate who you feel may be unable to fairly and objectively review and take action with respect to this matter, please forward in writing an identification of such individual(s) and a complete 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 the Certification Board at CB@lunarline.com no later than 5 p.m. ET, **(date)**.

If (a) you choose not to appear or to present evidence contrary to the complaint and information contained in the file, or (b) you choose not to appeal a decision and recommendation of the Ethics Committee, it will be understood that you agree with and waive any and all objections to these proceedings and any action that may be taken.

Regards,

(Name)

(Title)

Revision History Table

| Revision | Approval Date | Description of Change |
|----------|---------------|---|
| 1.0 | 12/30/2016 | Original release |
| 1.1 | 01/03/2018 | Update to branding; update to consistently reference Ethics Committee, verse Ethics Review or Review Committee |
| 1.2 | 1/23/2018 | Logo update, cover page branding |
| 1.3 | 4/30/2018 | Branding updates, minor updates |
| 1.4 | 10/31/2018 | Adjust appeals process to clarify that the decision-making personnel engaged in the appeals-handling process in the certification body are different from those who were involved in the decision being appealed. |
| 1.5 | 3/11/2019 | Add timeline for appeal response. |
| 1.6 | 3/14/2019 | Addition of online form instructions. |

**Director of Certifications provides final approval for all revisions.*