

## *Annex A: Analysis of ISO 28007 against the ICoCA Certification Assessment Framework*

This document sets out the ICoCA Board of Directors' analysis of ISO 28007-1 (2015) ("ISO 28007") against the ICoCA Certification Assessment Framework. This analysis has informed the Board's view on the extent to which ISO 28007 is consistent with the ICoC. It has further been used to help identify the additional information that Board believes is necessary to require from a company certified to ISO 28007, by a properly accredited certification body, in order for that company to be certified by the ICoCA. Such additional information is described in Annex B to the Recognition Statement.

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<sup>1</sup> Comments highlighted in yellow are linked to additional information contained in Annex B.

Comments highlighted in green are technical differences between the standard and the Code, which do not trigger additional information requirements.

Requirement Category	System/Policy Category	Objective Questions	ICoC Ref	ISO 28000 (2007)	ISO 28007 (2015)	Comments re Standard/ICoC alignment
<b>1. Governance / Oversight Framework</b>			3, 6, 17, 44			
	<b>1.1 Risk Assessment Program(s)<sup>2</sup></b>		3, 6	4.3		
		Does the standard require the company have a program to conduct risk assessments?		4.3.1; 4.1	4.2.2	The Standard consider broad risk assessment as an important part of a Security Management System.
		Does the standard require sufficient participation in the required risk assessment program by senior operational and field management personnel?		4.2; 4.3	4.1.7; 4.2.1	The Standard requires top management “to define and document its commitment to a risk management approach”, but the participation of senior operational and field management personnel in the risk assessment program is not explicitly required.
		Does the standard require that the company’s risk assessment program cover human rights and humanitarian law related risks?		4.3.2 a), b)	4.1.2; 3.6	There is no explicit requirement in the Standard to include human rights in the company’s risk assessment program.
		Does the standard require a program to conduct impact assessments of ongoing operations, including HRs and IHL?	6 d	---	4.2.2; 4.1.2	Although the Standard requires an impact assessment, it does not specify the inclusion of human rights and IHL impacts in that assessment.
	<b>1.2 Compliance Program</b>					
		Does the standard require that all applicable policies be applied to	16	4.2	4.1.10	The Standard requires PMSCs to have a “legal enforceable agreement covering such arrangements including: a) commitment by a subcontracted

<sup>2</sup> The requirement to conduct risk assessments, though not stated explicitly in the Code, can be derived both from the endorsement of the “Respect, Protect, Remedy” framework (ICoC paragraph 3) and from the commitment to operate “in accordance with relevant corporate standards of business conduct” (ICoC paragraph 6(b)).

		Contractors and Suppliers providing security services?			entity to abide by the same legal and regulatory obligations and equivalent Code of Ethics as the organizations, including those under this International Standard”
		Does the standard require a company to have a process to consider the potential impact of UN Security Council Sanctions on contracts with governments and their agents and to abide by any prohibitions?	22, 57	---	4.2.4 The Standard requires the Company to identify and incorporate “all legal and regulatory requirements [...] [including] applicable and relevant international and national legal, regulatory and other requirements [...]. However, since the ICoCA specifically refers to UN Security Council Resolutions, companies certifying under the standard are requested to provide additional information showing that they incorporate UN Security Council Resolutions among the applicable international legal requirements.
		Does the standard require a company to have a process to evaluate and prohibit the practices described in ICoC Paragraph 22?	22	---	4.2.4 The Standard requires the Company to “identify and incorporate into the security management system all legal and regulatory requirements, as well as any applicable Codes and Conventions” and to “identify relevant and applicable international and national laws and agreements, [including] [...] employment law and human rights obligations [...].” The Standard does not require PMSCs to have a process to evaluate and prohibit the specific practices described in paragraph 22 of the ICoC. Companies certifying to the standard are therefore requested to demonstrate that they include a specific prohibition of the practices described in ICoC Paragraph 22.
		Does the standard require that a company maintains awareness of all reporting requirements?	22, 24, 28, 63	4.4.2	4.5 The Standard requires PMSC to “ensure that personnel doing work under the organization’s control should be aware of the organization security management policy, culture and Code of Ethics.” Reporting requirements are part of the Management System in the Standard in Section 5.5 of the Standard, analysed below in Section 1.3 of this document.
		Does the standard require a company to have a process to ensure it has all licenses (if any) required for the sale of goods or services?	25	---	4.2.4 a), b) 5) a) The Standard requires PMSC to “establish, implement and maintain procedures to: a) identify applicable and relevant international and national legal, regulatory and other requirements related to its activities and those of any subcontractors, functions, clients, contracts and areas of operations.” And: “(...)appropriate prior approval and any licence necessary for the carriage, transit and brokering of firearms and other controlled goods ;”
		Does the standard require a company to have an anti-corruption policy or	26	---	4.2.4 The Standard requires PMSC to “identify and incorporate into the security management system relevant and applicable international and national

		program?				laws and agreements (...) relating to bribery, corruption and graft". While incorporation of relevant and applicable international laws and agreements into the security management system, as required in the Standard, is a positive step, the Code also requires PMSCs to have their own anti-corruption policy or programme.
		Does the standard require that the company have all required authorizations and licenses to use and maintain weapons and ammunition, and hazardous materials?	56, 43(c)	---	4.2.5 a), f); 4.2.4 b) 3); 4.2.4 5) a)-e)	<p>The Standard requires companies to “establish, implement and maintain procedures to (...) identify relevant and applicable international and national laws and agreements which include but are not limited to the (...)applicable national laws relating to the procurement, carriage including export and import licensing, storage, use and disposal of firearms and security related equipment”</p> <p>The Standard also requires PMSC, in section 4.2.5, to “acquire and maintain legal authorisations for the possession, export and transshipment of firearms and ammunition required by applicable national and international law; and to comply with any home or flag state or local requirements in respect of identifying and licensing individuals who will use such firearms, including “end user certificates” where national laws apply.”</p>
		Does the standard require the company to ensure that all vehicles discharging contractual responsibilities are registered and licensed with relevant national authorities?	43(b)	---	---	<p><b>The Standard does not include such requirement for PMSCs.</b></p> <p>The requirement may be inapplicable to PMSCs in some instances, but should be complied with to the extent that PMSCs operate vehicle (including small boats, transportation vehicles, etc.) in complex environments.</p>
		Does the standard require that all vehicles be individually identifiable while on duty?	43(b)	---	---	<p><b>The Standard does not include such requirement for PMSCs.</b></p> <p>See above</p>
		Does the standard require that all personnel be individually identifiable while on duty?	43(a)	---	5.2.2	The Standard requires PMSCs to “use, at all times, uniforms and markings to identify their role as private security personnel; such identification should be distinguishable from all others on board the ship.”
		Does the standard require the company to ensure that all weapons transfers are conducted in accordance with applicable laws and	57	---	4.2.4 b); 4.2.5	The Standard, in section 4.2.4 b) 3), requires PMSCs to “establish, implement and maintain procedures to (...) identify applicable national laws relating to the procurement, carriage including export and import licensing, storage, use and disposal of firearms and security related equipment” and

		UN Security Council requirements, including sanctions?				<p>incorporate them into the security management system.</p> <p>PMSC should also, according to section 4.2.5, “establish and document its processes for compliance with home state, coastal and flag state laws as regards the procurement, licensing and transshipment of firearms for each transit.”</p> <p><b>The ICoCA specifically refers to UN Security Council Resolutions.</b> While the Standard could be read to include these in its reference to “applicable national laws,” “home state, coastal, and flag state laws,” or other international legal requirements, companies should demonstrate that they specifically consider UNSCR in connection with the legality of weapons transfers</p>
		Does the standard require a policy concerning the prohibition of possession and use of illegal weapons and ammunition under any applicable law?	57	---	4.2.5 a), b), d), i), k), l), n)	The Standard requires PMSCs to have a policy concerning the prohibition of illegal weapons.
		Does the standard require a company to have a program to ensure that their hiring policies and the terms and conditions of work comply with all applicable labour and employment laws?	52	---	4.2.4 b); 5); 4.3.2	<p>The Standard, in section 4.2.4 b) 5), requires PMSCs to “establish, implement and maintain procedures to identify relevant and applicable international and national laws and agreements which include (...) employment law and human rights obligations.”</p> <p>Section 4.3.2 requires PMSC to follow the requirements of the ILO Conventions 182 and 138 regarding the use of child labour.</p>
	<b>1.3 Reporting Procedures</b>		24, 28, 63			
		Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be reported to the client?		4.5.2; 4.2.4	5.5; 5.3	<p>Section 5.5 of the Standard requires PMSCs to “establish and maintain procedures for incident monitoring and reporting [...]”, and to submit a “standard incident report to be agreed and annexed to the contract”, where appropriate, to the client.</p> <p>However:</p>

					<p>1. The scope of the obligation regarding the issuing of an ‘incident’ report is reduced to: (1) where there has been any attack and response to an attack, (2) where personnel have used a firearm, (3) where there has been damage or injury to personnel or equipment or (4) any other “significant event” which should be reported. It is important, therefore, that PMSCs demonstrate that national and international crimes are specifically included in reporting programmes.</p> <p>2. Companies should demonstrate that the language in Section 5.5 in the Standard is read as requiring PMSCs to always report the described incidents to the client.</p> <p>Note also that section 5.3 g) requires PMSCs to provide clients with a report with details of <u>any attack or use of force</u>.</p>
		Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be reported to a Competent Authority?	4.5.2	5.5	<p>Section 5.5 of the Standard requires PMSCs to establish and maintain procedures for incident monitoring and reporting. The Standard provides that “The organization should use a standard incident report to be agreed and annexed to the contract, both for its own internal use and to submit, where appropriate, to international liaison as a joint report with the Master as well as to the client and to the authorities of the flag state.”</p> <p>Companies should demonstrate that the language in 5.5 in the Standard is read as requiring PMSCs to always report the described incidents to the Competent Authority.</p>
		Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be reported to either the country of nationality of the victim, country of nationality of the perpetrator, or country where the act took place?	4.5.2	5.5; 5.9	<p>As noted above, the standard refers to international liaison or the authorities of the flag state.</p> <p>It should be noted that, under the Standard’s grievance mechanism, detailed in section 5.9, PMSCs are required to put in place procedures to document and report improper or illegal conduct either internally or by third parties to competent authorities.</p>
		Does the required reporting program include each of the practices or	---	5.5; 4.2.4	The scope of the obligation regarding the issuing of an incident report includes “any other significant event which should be reported.”

		behaviours described in paragraph 22 of the ICoC.			Deriving from the requirements in 4.2.4, PMSCs should include international crimes in their reporting programmes.
		Does the required reporting program include a requirement to report violations of the Code?	---	---	The ICoC is not considered in the reporting obligations described in the Standard.
		Does the standard ensure that company requires a written incident report in response to any of the types of incidents described in paragraph 63 of the ICoC?	---	5.5	<p>The Standard limits the requirement to where there has been any attack and response to an attack, where personnel have used a firearm, where there has been damage or injury to personnel or equipment or any other significant event which should be reported.</p> <p>The incidents addressed in paragraph 63 of the Code (e.g., criminal acts, incidents involving other security forces, etc.), should be considered as a "significant event that should be reported"</p>
		Does the standard require a company to have a process to conduct an internal inquiry regarding incidents described in paragraph 63 of the ICoC?	---	4.1.6; 4.6.2; 5.5; 5.9	<p>Section 5.5 requires procedures for incident monitoring and reporting, as well as "follow-up investigation and protection of evidence...", and specifies that these procedures should apply "where there has been any attack and response to an attack, where personnel have used a firearm, where there has been damage or injury to personnel or equipment or any other significant event which should be reported."</p> <p>Section 4.1.6 requires PMSCs to have a process for post incident actions to support internal evaluation of performance as part of the continual improvement process.</p> <p>Section 4.6.2 requires PMSCs to keep records of incident investigations and their outcomes.</p> <p>Section 5.9 requires that if an incident is reported through a grievance procedure, "the organization should establish and document procedures as follows: [...] an efficient investigative process of the grievance which includes means of regular communication with the complainant, and procedures to cooperate with any official external investigation..."</p>

		Does the standard require an incident report to include each of the following: <ul style="list-style-type: none"> <li>• time and location</li> <li>• identity and nationality of persons involved (including address and contact details)</li> <li>• injuries and damages sustained</li> <li>• circumstances leading up to the incident; and</li> <li>• measures taken by the company in response.</li> </ul>		---	5.5; 4.1.6 g)	The Standard requires PMSCs to produce a record of incidents detailing the identity of personnel involved; to identify lessons and prevent reoccurrence and to have a process of post incident actions in order support internal evaluation and continual improvement; detail the time and location of the incident; injuries and damages sustained and circumstances leading up to the incident.  However, some elements of the ICoC are not covered, including the nationality and addresses or contact details of persons involved in the incident.
	<b><u>1.4 Contracting Policies / Programs</u></b>		16-20, 22, 23			
		Does the standard ensure that the company requires Code compliance in its contracts with all contractors or subcontractors?		---	4.1.10	The Standard requires PMSCs to “have a legal enforceable agreement” covering activities outsourced to another entity including a commitment by the subcontracted entity to abide by the same legal and regulatory obligations and equivalent Code of Ethics including the obligations of the Standard.  The Standard refers to “an equivalent Code of Ethics,” but does not mention the ICoC.
		Does the standard require the company to have a process to review and ensure that performance in existing contracts/new contracts does not/would not directly and materially conflict with <ul style="list-style-type: none"> <li>• the Code;</li> <li>• applicable national or international law;</li> <li>• applicable local, regional and</li> </ul>		---	4.2.4	The Standard requires PMSCs to consider all legal and regulatory requirements, including any applicable Codes and Conventions, during the contract negotiations with a client. Taking into account differing jurisdictions and statutory requirements as between home, flag, coastal and port states.  The Standard does not require a process to review contracts for potential conflict with the ICoC.



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		international human rights law.				
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<b>2. Personnel Management Policies and Procedures</b>					
	<b>2.1 Hiring and Selection of Personnel</b>		45, 48, 49, 50-54		
		Does the standard require the company to have a verifiable vetting program for all Personnel?		---	4.3.2 The Standard requires PMSCs “to establish and maintain procedures for background screening and vetting of all security related persons working on its behalf to ensure they are fit and proper and qualified for the tasks they will carry out.”
		Does the standard require that the vetting process applies to both new hires and promotions to new positions?		---	4.3.2 The Standard refers to “all security related persons working [on the organisation’s behalf].”
		Does the standard require that all personnel be checked to ensure that they are qualified as defined by <ul style="list-style-type: none"> <li>• the contract;</li> <li>• applicable national law;</li> <li>• industry standards; and</li> <li>• the principles of the ICoC?</li> </ul>		---	4.3.2 The Standard requires PMSCs to carry out background screening in compliance with all relevant and applicable legal requirements. However, neither industry standards nor the principles of the ICoC are specifically mentioned.
		Does the standard require that the company refrain from hiring personnel under the age of 18 to perform Security Services?		---	4.3.2.1 4.2.4 The Standard, in section 4.3.2, requires PMSCs to consider that minimum age requirements “may” be set by local, home or flag state law.  In the same provision, it requires a commitment not to employ child labour as defined by ILO Conventions 182 (worst forms of child labour) and 138 (minimum age).  The Standard indicates that, in no circumstances, should any person younger than 21 years of age be employed in duties that might require the use of a firearm.  Though recognising the reference in 4.2.4 in the Standard to applicable international law and, indirectly, maritime law, not all possibilities of employment of persons under 18 for Security Services (as defined in the Code) are covered by the Standard, leaving open the possibility that persons under the age of 18 may be employed in unarmed Security Services.

		Does the standard mandate that the company require the applicant or prospective employee to authorize access to all personnel, government and employment records?	---	4.3.2	<p>The Standard requires that a company review employment history, criminal records and security and law enforcement service checks of personnel. However, such review is required to be done “where possible under individual privacy and data protection law.”</p> <p>The Standard does not specifically require PMSCs to require authorization from candidates to access records.</p>
		Does the standard require that company personnel agree to participate in internal and external investigations and disciplinary procedures?	---	4.1.6	<p>The Standard requires a process to support state authority investigations/prosecutions should a formal investigation be required.</p> <p>The Standard does not include an explicit requirement for the company to require its personnel to participate in internal and external investigations.</p>
	42	Does the standard require that the company’s anti-discrimination policy apply to race, colour, sex, religion, social origin, social status, indigenous status, disability, or sexual orientation when hiring personnel and selecting personnel on the basis of inherent requirements of the contract?	---	4.2.4 5)	<p>The Standard refers to legal, statutory and other regulatory requirements, specifically 5) points to employment law and human rights obligations and any other commitments to which the organization may subscribe.</p> <p>However, the Standard does not mention discrimination explicitly in any provision.</p>
	48	<p>Does the standard require that a company ensure personnel who carry weapons are checked to ensure that they have not:</p> <ul style="list-style-type: none"> <li>• been convicted of a crime that would indicate lack of character and fitness to perform Security Services in a manner consistent with the ICoC;</li> <li>• been dishonourably discharged;</li> <li>• had other employment terminated for documented violations of any of the principles</li> </ul>	---	4.3.2	<p>The Standard requires PMSCs in section 4.3.2 to establish procedures for background screening and vetting of all security related persons working on its behalf to ensure they are fit and proper and qualified for the tasks they will carry out. This provision covers the requirements of paragraph 48 of the ICoC.</p>

		of the ICoC; or <ul style="list-style-type: none"> <li>• had other history of conduct that (according to an objectively reasonable standard) brings into question their fitness to carry a weapon.</li> </ul>				
	<b><u>2.2</u></b> <b><u>Performance Review Process</u></b>		47			
		Does the standard require that the company have an ongoing personnel performance review process to ensure that personnel meet appropriate physical and mental fitness standards?			4.3.2; 6	The Standard requires “ongoing vetting to establish continued suitability for security operations in high risk areas...,” this provision, together with section 6 of the Standard should be read as requiring PMSCs to have a performance review process to ensure that personnel meet appropriate physical and mental fitness standards.
		Does the standard require that a company’s performance review process assess the ability of personnel to perform duties in accordance with principles of the Code?		---	4.3.2; 6	See above. The performance review process should also assess the ability of personnel to perform duties in accordance with principles of the Code.
	<b><u>2.3</u></b> <b><u>Subcontractor Hiring</u></b>		50-51			
		Does the standard require the company to provide the ICoC to all subcontractors and other personnel providing security services, and to require that they operate in accordance both with the Code and with the standard?		---	4.3.3	The Standard, in requires PMSCs to establish procedures for selection, background screening and vetting of subcontractors, including: the organisation’s policies and those required by the standard, including health, safety and environment policies and procedures, and its Code of Ethics.  However, the Standard does not refer to the ICoC.

		Does the standard require the company to ensure either (a) that the selection, vetting and training procedures required by the ICoC and the standard are conducted by all subcontractors or (b) that, if subcontractors cannot perform the selection, vetting and training procedures required by the ICoC and the standard, the company will ensure that those procedures are conducted in accordance with the ICoC?		---	4.3.3 a); 4.4.2; 4.4.3 o)	The Standard requires PMSCs to ensure that subcontractors comply with the Standard regarding vetting and screening, training and, more widely, the organization's policy.  However, the Standard does not require PMSCs to ensure that vetting or training is conducted in accordance with the ICoC, nor does it address what procedures will be applied if the subcontractor cannot perform those activities.
	<b><u>2.4 Employment Practices / Terms and Conditions of Work</u></b>		52-54			
		Does the standard require a company to have a program to ensure that the terms and conditions of work comply with all applicable labour and employment laws?		---	4.2.4 b) 5; 4.3.2	The Standard, in section 4.2.4 b) 5, requires PMSCs to "establish, implement and maintain procedures to (...) identify relevant and applicable international and national laws, (...) including: 5) employment law and human rights obligations and any other commitments to which the organization may subscribe."  Section 4.3.2 refers to the prohibition of the worst forms of child labour.
		Does the standard require that relevant employment reference materials, such as employment contracts, incorporate the Code and applicable labour law?		---	4.5.2 b)	The Standard requires PMSCs to "determine the need for internal and external communications relevant to the PMSC management system including communicating throughout the organization the importance of: (...) b) meeting legal and regulatory requirements." It does not, however, refer explicitly to the ICoC or labour law, or to the need to communicate through the language of employment contracts.

		Does the contract require that all terms and conditions of employment are available to personnel in writing, in a language they can understand?	---	---	The Standard does not include a requirement in this regard.
		Does the standard require that employment records and reports be kept for all personnel during and for at least 7 years after employment?	---	4.3.2 2)	The Standard requires PMSCs to keep records of the screening process, where legally permissible, on personnel files under strict controls to keep them secure for at least seven years (or as required by local statute).  The Standard refers only to the “screening process” and not to “employment records.”
		Does the standard require that the company make employment records accessible to ICoCA or a Competent Authority, except where prohibited by law?	---	---	The Standard does not include a requirement in this regard.
		Does the standard require that the company hold passports, travel documents, and other identification materials only for such time as is reasonably necessary for administrative processing?	---	---	The Standard does not include a requirement in this regard.

<b>3. Rules for the Use of Force</b>			29-32			
		Does the standard require that a company have guidance or general policies covering Rules for the Use of Force?		---	5.3	The Standard requires PMSCs to agree with the client and the Master in advance defined and documented procedures for the Use of Force in accordance with international and flag state law.
		Does the standard require that company guidance regarding the use of force is checked for consistency with applicable law?		---	5.3	The Standard requires agreed (with the Master) procedures for the Use of Force “in accordance with international and flag state law,” and that these be annexed to the contract.
		Does the standard require that a company’s RUF and guidance incorporate concepts of necessity, proportionality and appropriateness?		---	5.3; 4.1.6	<p>The Standard requires a “detailed and documented response plan which provides for</p> <ul style="list-style-type: none"> <li>a) reasonable steps to avoid and deter use of force;</li> <li>b) a graduated deterrent approach to protect personnel;</li> <li>c) use of force reasonable and necessary to deter threats and appropriate to the situation consistent with applicable law...;</li> <li>d) a Use of Force continuum to resolve threats with minimum necessary force;</li> <li>e) ...that Use of Force can only happen in self-defence and defence of others if there is an imminent threat of death or serious bodily harm...”</li> </ul> <p>The concepts of necessity and appropriateness are incorporated into the Standard. Requirements for a “graduated deterrent,” and that threats should be resolved with minimum necessary force are also part of the Standard. However, the principle of proportionality is not specifically mentioned.</p>
		Does the standard require RUF stipulations for the use of firearms only in self-defence or defence of others with the threat of death or serious injury is imminent?		---	5.3 e)	See above.

4. Management of Weapons and Materials of War			56-62			
		Does the standard require the company to have policies that cover the possession, use and storage of weapons, ammunition, and materials of war?		---	4.2.5; 4.2.4	<p>The Standard requires PMSCs, in section 4.2.5, to establish and document... processes for compliance with home state, coastal and flag state laws as regards the procurement, licensing and transshipment of firearms for each transit.</p> <p>Section 4.2.4 requires PMSCs to have procedures in place in line with applicable national laws relating to the procurement, carriage including export and import licensing, storage, use and disposal of firearms and security related equipment.</p>
		Does the standard require that a company have all required authorizations for possession and use of weapons, ammunition, and material of war?	56, 60	---	4.2.4; 4.2.5	Section 4.2.4 b) 5) b) requires appropriate prior approval and any licence necessary for the carriage, transit and brokering of firearms and other controlled goods; and d) appropriate prior approval and licences for the transport, carriage, storage of firearms and security related equipment from, into or through a state.
		Does the standard require that a company ensure there is no unauthorized or altered, illegal weapons or material of war?	57, 61	---	4.2.5 b), n)	The Standard requires PMSCs to ensure that their personnel only use licensed firearms and ammunition as stipulated in the contract;
		Does the standard require that a company ensure all weapons and materials of war transfers and transactions are in accordance with applicable law and UN Security Council requirements and sanctions?	57, 61	---	4.2.5 a) 4.2.4	<p>The Standard requires PMSCs to “acquire and maintain legal authorisations for the possession, export and transshipment of firearms and ammunition required by applicable national and international law”</p> <p>However, while the Code specifically refers to UNSCR, the Standard does not. PMSCs should therefore demonstrate that they incorporate UNSCR into their understanding of the international legal requirements in 4.2.4.</p>



	<p>Does the standard require policies for management of weapons and ammunition that include:</p> <ul style="list-style-type: none"> <li>• secure storage</li> <li>• controls over their issue</li> <li>• records regarding to whom and when weapons are issued</li> <li>• identification and accounting for all ammunition</li> <li>• verifiable and proper disposal.</li> </ul>	58,62	---	4.2.5 d) e) k)	<p>The Standard covers the requirements of the Code:</p> <ul style="list-style-type: none"> <li>• 4.2.5 e) requires safe and secure storage arrangements</li> <li>• 4.2.5 d), k) to have a central record of all firearms and ammunition held, by type, serial number and location</li> <li>• detailing movement, issue, receipt, maintenance, modification, usage and disposal history;</li> <li>• 4.2.5 d) Ammunition</li> <li>• Disposal: verifiable 4.2.5 d) and proper (4.2.4 b) 3) in accordance with applicable law)</li> </ul>
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5. Grievance Mechanism			66,67			
		Does the standard require a company to have a grievance program that facilitates claims of violations of Code brought both by company personnel and by third parties?		---	5.9	<p>The Standards establishes that “the organization should establish and maintain accessible procedures to document and address complaints or grievances received from internal or external interested parties and stakeholders.”</p> <p><b>However, the Standard does not include violations of the Code.</b></p>
		Does the standard require the company grievance procedure that facilitates reporting of improper or illegal conduct, both internally and, where appropriate, to Competent Authorities?		---	5.9	<p>The Standard requires “procedures to document and report improper or illegal conduct either internally or by third parties to competent authorities.”</p> <p><b>However, the Standard does not include violations of the Code.</b></p>
		Does the standard require that a company’s grievance mechanism be fair, accessible, and offer effective remedies, including recommendations for the prevention of recurrences?		---	5.9. e) and chapeau	<p>Section 5.9 e) requires PMSCs to establish procedures for “corrective and preventative actions, including disciplinary action where infractions are found, commensurate with the fault which should be documented and retained.”</p> <p>The principle of accessibility is present in section 5.9, in its chapeau.</p> <p><b>The Standard does not mention the principle of “fairness.”</b></p>
		Is the process published on a publically accessible website?		---	---	<p><b>The Standard does not require the company’s grievance process to be publicly available or published on a website.</b></p>
		Does the procedure allow for investigations, and are the investigations prompt, impartial, and taken with consideration to confidentiality?		---	5.9 c), d), f), h)	<p>The Standard, in section 5.9 d), states that the procedure should establish “expeditious address of complaints ideally within three months of initial notification” <b>The Standard does not otherwise address issues of promptness, impartiality and confidentiality.</b></p>
		Does the standard require that records be kept of allegations, findings and disciplinary measures?		---	5.9	<p>The Standard requires recording of reception of complaints and grievances, as well as reporting of improper and illegal conduct to competent authorities.</p>

					That Standard does not, however, require that records of allegations, findings and disciplinary measures be kept.
		Does the standard require cooperation with offices conducting investigations, and that grievance records be available to Competent Authorities (except as provided by applicable law)?	---	5.9 c)	The Standard requires PMSCs to have in place an efficient investigative process of the grievance which includes means of regular communication with the complainant, and procedures to cooperate with any official external investigation.
		Does the standard require that the grievance procedure prevent impeding of witnesses, testimony, or investigations to grievances?	---	5.9 f), h)	The Standard requires PMSCs to ensure the “protection of any whistle-blower within the organisation for making a report [and] procedures to protect complaints from retribution,” but does not address ensuring protections from impeding witnesses, testimonies or investigations.
		Does the standard require that the grievance procedure provide for disciplinary measures, including termination of contracts?	---	5.9 e)	The Standard requires the use of corrective and preventative actions, including disciplinary action where infractions are found, commensurate with the fault which should be documented and retained;
		Does the standard require that a company have a process to provide protection against retaliation for personnel who report wrongdoings in good faith?	---	5.9 f), h)	The Standard provides protection for whistle-blowers, requiring “protection of any whistle-blower within the organisation for making a report’;” and “procedures to protect complaints from retribution.”

6. HSE Program			64			
		Does the standard require that a company endeavour to provide a healthy and safe working environment?		---	5.8 4.1.6	<p>The Standard requires PMSCs to “have a documented, robust and auditable health, safety and environmental policy.”</p> <p>The Standard also recognises that HSE is an obligation of the Master of the vessel, and requires a PSC’s personnel to “conform to the ship’s procedures for health, safety and environmental risks.” The PMSC itself is, however, expected to provide certain HSE-related training and equipment to its personnel as detailed below. <b>However, the Standard does not address or provide instruction on the obligation(s) of the PMSC in the event the Master of the vessel does not provide a healthy and safe working environment.</b></p>
		Does the standard require that a company provide precautions to protect staff in high-risk or life threatening operations?		---	5.8	<p>The Standard requires a PMSC to provide for its personnel:</p> <ol style="list-style-type: none"> <li>1) hostile environment training;</li> <li>2) appropriate personal protective equipment;</li> </ol>
		<p>Does the standard require that a company assess and/or address each of the following:</p> <ul style="list-style-type: none"> <li>• Assessing risk of injury to personnel;</li> <li>• Risk of injury to local populations;</li> <li>• Hostile Environment threats ;</li> <li>• Appropriate PPE ;</li> <li>• Appropriate weapons and ammunition ;</li> <li>• Medical support ;</li> <li>• Psychological health ;</li> <li>• Deterrence of workplace violence ;</li> <li>• Misconduct ; and</li> <li>• alcohol or drug abuse.</li> </ul>		---	4.1.11; 5.8 1); 5.8 2); 5.8 3); 5.8.4)	<p>The Standard covers risk of injury to personnel in section 4.1.11. Then, as health section points out the other elements: - risk of injury to local populations: could be part of the “human rights abuse or other practices contrary to human rights obligations” in 5.8 4)</p> <ul style="list-style-type: none"> <li>▪ Hostile Environment threats : 5.8 1)</li> <li>▪ Appropriate PPE : 5.8 2)</li> <li>▪ Appropriate weapons and ammunition: not explicitly, but could possibly be part of the PPE?</li> <li>▪ Medical support : 5.8 3)</li> <li>▪ Psychological health: 5.8 3)</li> <li>▪ Deterrence of workplace violence : 5.8 4)</li> <li>▪ Misconduct; and</li> <li>▪ Alcohol or drug abuse: 5.8 4)</li> </ul>

<b>7. Insurance /Liability Coverage</b>			69			
		Does the standard require evidence of sufficient coverage of financial capacity to meet commercial liabilities?		---	4.1.11	The Standard requires a PMSC to “demonstrate that it has sufficient insurance to cover risks and associated liabilities arising from its operations and activities, consistent with contractual requirements. When outsourcing or subcontracting services, activities or functions, or operations, the organization should ensure the subcontracted or outsourced entity has appropriate insurance cover for those activities.”

Requirement Category	System/ Policy Category	Objective Questions	ICoC Ref	ISO 28000	ISO 28007	Comments re ICoC alignment
<b>Training Programs and Curriculum</b>	<b>Training Requirements</b>		16, 27, 55, 59			
		Does the standard require a training program that applies to all personnel (including contractors and subcontractors)?	16, 55	4.4.2 4.5.3	4.4.2	The Standard requires a PMSC to ensure that training requirements apply to all personnel and sub-contractors:  “The organization should ensure that all persons performing tasks on its behalf, both including employees and, subcontractors, and outsource partners, have received adequate and appropriate individual and collective training to demonstrate competence in their allocated tasks and activities, to cover the full scope of the certification.”
		Is the training program documented, and does it require that the company keep all records of attendance and results, including practical exercises?	55	4.4.2	4.4.2, 4.4.3	The Standard speaks of “comprehensive, detailed and auditable records” and 4.4.3 of “verifiable training”
		Does the standard require that a company have a training program that provides both initial and recurrent training?	55, 59	---	4.4.2	The Standard requires both “initial and refresher continuation training.”
	<b><u>Mandatory Subjects for Training:</u></b>					
		Does the standard require the company conduct training on each of the following				
		1. the ICoC?	27, 55	---	---	The Standard does not require training on the ICoC.

	2. religious, gender, and cultural issues with respect to the individuals they come into contact with as a result of their activities?	4	---	---	The Standard does not require training on religious, gender, or cultural issues as detailed in the Code.
	3. Rules for the Use of Force, including: <ul style="list-style-type: none"> <li>• legal restrictions</li> <li>• proportionality</li> <li>• appropriateness</li> <li>• use only in self-defense or defense of others?</li> </ul>	29-31,59	---	4.4.3 c); 5.3	The Standard requires training on the UoF in section 4.4.3 c), and further provides guidance on Rules for the Use of Force in section 5.3. However, as indicated above in Section 3, the Standard, as it relates to Use of Force, does not specifically refer to the principle of proportionality.
	4. Reporting Obligations	24, 28, 34, 37, 38, 39, 63	---	4.4.2 d) 4.4.2 c	The Standard speaks of procedures to reduce the likelihood and/or consequences of a disruptive or undesirable event, including procedures to respond to and report “incidents.”  It should be read, from 4.4.2 c) in the Standard, that training should be given to personnel on their reporting obligations, including with respect to: reasonable suspicion of commission of national and international crimes as described in Paragraph 22 of the Code; breaches of the ICoC; apprehension of persons; sexual exploitation or abuse, gender-based violence; human trafficking, slavery, debt bondage; use of weapons.
	5. Awareness of Specific Human Rights/ Prohibited Practices described in paragraph 22 of the ICoC	22-23	---	---	The Standard does not address training to make personnel aware of the prohibited practices described in paragraphs 22 and 23 of the ICoC.
	6. Anticorruption	26	---	4.2.4 b) 4)	The Standard requires the inclusion of “conventions and laws relating to bribery, corruption and graft” in the security management system. Companies should demonstrate, however, that anti-corruption is explicitly included in the training curriculum.
	7. Applicable law		---	4.4.2 c)	The Standard requires that “all training received should be in accordance with the requirements of the home and flag state laws, where applicable.”
	8. Type and model of weapon carried – regular, verified, and recurrent	59	---	4.4.3 f); 4.4.4 c)	The Standard requires “verifiable training that demonstrates competence with the specific firearms, ammunition and other related security equipment that will or may be used in undertaking their assigned duties.”

						Additionally, “those authorized to carry firearms should undergo refresher training at least once per year on the specific firearms authorized.”
		9. Hostile Environment Training			5.8 1)	The Standard requires hostile environment training;
		10. <b>If</b> contract covers law enforcement duties or support to national law enforcement: <ul style="list-style-type: none"> <li>• Laws applicable to enforcement of that state</li> <li>• UN Basic Principles on Use of Force and Firearms by Law Enforcement Officials.</li> </ul>	32	---	---	This situation is not included in the Standard.
		11. <b>If</b> contract involves detention duties: <ul style="list-style-type: none"> <li>• Applicable national and international laws;</li> <li>• Prohibition on torture and other cruel and inhumane or degrading treatment.</li> </ul>		---	---	The PMSC should train its personnel on how to conduct detention in situations where detention is unavoidable.
		12. <b>When</b> Apprehension is required in the course of protecting persons or property: <ul style="list-style-type: none"> <li>• When apprehension is permitted;</li> <li>• How and when persons should be transmitted to competent authorities;</li> <li>• Rules for incidental detention;</li> <li>• Applicable national and international law;</li> <li>• The requirement and a process for reporting to clients; and</li> <li>• The requirement for humane treatment.</li> </ul>		---	---	The PMSC should train its personnel on how to conduct apprehension in situations where apprehension is unavoidable.