

Certification Additional Information Requirement for ISO 18788

1. Provide your current certificate, including annexes and appendices, to the Board-recognised standard and details of any conditions, limitations, or reservations applied to the certification.

Why?

The Association needs this information to confirm that you have been certified to a Board recognised standard, and that such certification has been conducted by a Certifying Body (CB) accredited by a national accreditation body that is itself a member of the IAF and MLA. In addition, the Board needs to understand the scope of the audit conducted and of the certification awarded.

What will the ICoCA do with this information?

The Association will confirm that the CB who conducted the certification is an independent, 3rd party certification body that is accredited by a national accreditation service which is a member of the International Accreditation Forum (IAF) and its Multilateral Agreement (MLA).

2. Provide the full audit report, and most recent surveillance reports if applicable, subject to any redactions of particularly sensitive information. The audit report should include all detailed areas for concern and non-conformities detected throughout the process. Your company must articulate a specific justification for each redaction explaining why the information is particularly sensitive.

Why?

The Association will require the full audit report, and most recent surveillance reports if applicable, for an interim period as it assesses what additional information it needs to determine compliance with the Code.

3. Provide your Corrective Action Plan.

Why?

The Association needs this information to be able to understand how the company is proposing to rectify any non-conformities to the Code and within what timeline. The Association may engage with the company to assist in improving the Nonconformance Report in a means consistent with the Code and in its implementation.

4. Provide your Human Rights Risk Assessment (HRRA) or Human Rights Impact Assessment model and/or process.

Why?

The Association needs this information to be able to assess whether the company has complied with the requirements of ICoC paragraphs 6(d) (which requires that a company deter, monitor, report, and effectively address adverse impacts to human rights) and 21 (which requires that a company exercises due diligence to ensure compliance with the law and the principles contained in the Code).

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What will the ICoCA do with this information?

The Association will review Member companies' Human Rights Risk Assessment processes in order to ensure that the essential elements of the Code are incorporated, and that the results of the process inform relevant systems, processes, and operations. In an effort to guide that inquiry, the ICoCA has developed the attached matrix, which includes the essential elements and attributes that the Secretariat will look for in reviewing HRRAs processes.

These attributes were developed in consultation with existing HRRAs processes (including those in use within the PSC industry) and further utilizing expertise and experience within the Board¹. Members should note, however, that the matrix is not intended to prescribe any particular format for company HRRAs. Indeed, the Association is aware that company HRRAs will differ, and are intended to reflect and work within existing company management structures and systems. The attached matrix, therefore, should be used as a guide to the substantive content that should be addressed within an HRRAs process, and as an indicator of the key attributes and issues that the Secretariat will look for when it reviews and assesses HRRAs processes. It is likely that this matrix and the Association's guidance for HRRAs content will evolve as the industry gains experience in developing and working with HRRAs processes.

5. Describe, or provide appropriate documents or records to reflect, the following:

a) Regarding your employment policies:

- I. The manner in which you ensure relevant employment reference materials incorporate the Code and applicable labour law;
- II. The manner in which you ensure, consistent with application national law, that personnel agree to participate in internal and external investigations and disciplinary procedures as well as in any public investigations conducted by competent authorities, except where prohibited by law;
- III. The manner in which you ensure that employment records be made accessible to ICoCA or a Competent Authority, except where prohibited by law;

b) The manner in which you provide training to your personnel on the ICoC and its fundamental principles;

c) The manner in which you make sure that the activities to be carried out as part of a contract are not contrary to UN Security Council Resolutions;

d) The manner by which you will report, and will require your personnel to report, known or reasonable suspicion of the commission of any national and international crimes to one or more of the following Competent Authorities: in the country where the act took place, the country of nationality of the victim, or the country of nationality of the perpetrator;

Why?

In determining that ISO 18788 meets the requirements of Article 11 of the Articles of Association, the ICoCA carried out an evaluation of the Standard designed to identify any concerns regarding recognition of the standard, any clarifications needed regarding ambiguities in the language of the standard, and any inconsistencies between the standard and the ICoCA Certification framework. Based on this evaluation, the Association identified these questions designed to obtain additional information relevant to the human rights and humanitarian

¹ The requirement for a HRRAs is found in paragraphs 6(d) and 21 ICoC; the specific HRRAs content is required by the Board in accordance with Article 11.2.1 of the AoA.

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impact of operations that is, consistent with Article 11 of the Articles of Association, necessary for assessing whether a company's systems and policies meet the requirements of the Code and its readiness to participate in the Association.

- e) **The manner in which, when formally authorized to assist in the exercise of a state's law enforcement authority, you ensure that your use of force or weapons complies with all national and international obligations applicable to regular law enforcement officials of that state and, as a minimum, with the United Nations Principles on the Use of Force and Firearms by Law Enforcement Officials (1990).**

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ICoCA Human Rights Risk Assessment Guidance

The ICoCA needs to assess whether the Company has established and maintains a human rights risk assessment methodology in place as a necessary condition for the Company to be able to deter, monitor, report, and effectively address adverse impacts to human rights; and to exercise due diligence to ensure compliance with the law and the principles contained in the ICoC.

This is a Human Rights Risk Assessment Guidance that ICoCA Members can use. In order to be certified by the ICoCA, companies must have a written risk assessment process that includes, at a minimum, the following human rights-specific components, as specified in the ICoC.

For information purposes only. TO BE FILLED BY THE ICOCA SECRETARIAT. This is the criteria and methodology that the ICoCA Secretariat will use to assess the applicant's human rights risk assessment model and/or process.

	Yes	No	Reference in attached Company policy	Reference in ICoC or other guidance
1. Process questions:				
1.1. Frequency of HRRRA				
HRRRA is conducted anytime the company does an overall enterprise risk assessment?				Guiding Principles on Business and Human Rights. Principle 17, 18 and commentaries.
HRRRA is conducted each time the company takes on a new contract or project, or enters into a new operational environment?				Guiding Principles on Business and Human Rights. Principle 17, 18 and commentary
1.2. Involvement by relevant internal and external stakeholders:				
Senior operational managers are involved in the HRRRA, consistent with the operational level of the assessment?				Guiding Principles on Business and Human Rights. Principle 16, 19 and commentaries.
Relevant specialist personnel, such as Health, Safety and Environment; HR, legal/compliance, procurement, etc. are involved in the HRRRA?				Guiding Principles on Business and Human Rights. Principle 16, 19 and commentaries.
External advisers are involved in HRRRA?				Guiding Principles on Business and Human Rights. Principle 18 and commentary.
External stakeholders are involved in HRRRA?				Guiding Principles on Business and Human Rights. Principle 18 and commentary.
Where security tasks are subcontracted, is subcontractor management consulted or involved in HRRRA?				Guiding Principles on Business and Human Rights. Principle 17 and commentary.
HRRRA process involves checking whether all necessary personnel and inputs are involved?				Guiding Principles on Business and Human Rights. Principle 19 and commentary.
1.3. Follow-up after HRRRA				
Results of HRRRA are considered in company determinations on entering into new contract or operating environment?				Guiding Principles on Business and Human Rights. Principle 17, 19 and commentaries.
Results of HRRRA inform operations, training, and HR/recruiting?				Guiding Principles on Business and Human Rights. Principle 16, 17, 20 and commentaries.

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2. Substantive questions relating to internal controls and policies				
2.1. Use of Force				
HRRRA evaluates the risks related to the escalation of force and the excessive use of force in the context of operations?				29
HRRRA evaluates the risk that Rules for the Use of Force do not comply with applicable law, ICoC commitments, and client requirements?				29
HRRRA evaluates the risk that the Rules for the Use of Force are not adequately understood by all personnel (company and subcontractors)?				30
HRRRA considers the risk of use of force or firearms by personnel beyond self-defence or defence of others?				31
2.2. Apprehension and Detention				
HRRRA evaluates the risk of employees needing to detain persons?				33
HRRRA evaluates the risk of employees needing to apprehend persons?				34
If operations include guarding, transporting or questioning detainees as contracted for by a State, HRRRA considers the risks of abusive practices in violation of applicable national and international laws?				33
2.3. Identification & Registration				
HRRRA evaluates potential that operations will take place without proper identification and/or registration of personnel and equipment, and considers potential resulting negative impacts?				43
2.4. Weapons				
HRRRA considers risks associated with the presence of illicit weapons and ammunition around your operations?				56, 57, 58
HRRRA considers risks of personnel using or storing weapons or ammunition in a manner not compliant with international principles?				59-62
2.5. Personnel Suitability				
HRRRA evaluates potential that inappropriately-screened and trained personnel will have access to weapons or other means of deadly force?				45-49
2.6. Grievance Mechanisms				
HRRRA evaluates potential that grievance mechanism will not function in an accessible, fair, transparent manner?				67
3. Substantive Questions relating to prohibitions contained in ICoC				
3.1. Torture or Other Cruel, Inhuman or Degrading Treatment or Punishment				
HRRRA considers the risk that personnel will engage in torture and other cruel, inhumane, or degrading treatment or punishment and evaluates the adequacy of company's measures to prevent involvement of personnel, under any circumstances, in such situations?				35, 36
HRRRA considers the risk that personnel will witness or otherwise become aware of torture and other cruel, inhumane, or degrading treatment or punishment, but fail to report it?				37

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3.2. Sexual Exploitation and Gender-based Violence				
HRRRA considers risks associated with the presence of sexual exploitation and gender-based violence in the operating environment and evaluates the adequacy of measures to prevent the involvement by personnel in such situations?				38
3.3. Human Trafficking				
HRRRA considers whether there is a risk of recruiting any personnel victims of human trafficking and evaluates the adequacy of measures to prevent the involvement by personnel in such situations?				39
HRRRA considers risks related to human trafficking in the operating environment?				39
3.4. Prohibition of Slavery and Forced Labour				
HRRRA evaluates the risk of existence of slavery or forced labour in the context of your operations and the adequacy of measures to prevent recruiting any personnel which is victim of forced labour?				40
3.5. Child Labour				
HRRRA considers the risk of engagement of the company in child labour?				41
HRRRA considers the adequacy of measures to prevent personnel, under any circumstances, from involvement in incidents of child labour, prostitution, or other illicit activities?				
HRRRA considers the risk that personnel will witness or otherwise become aware of incidents of child labour, prostitution, or other illicit activities, but fail to report on it?				41
3.6. Discrimination				
HRRRA evaluates the risk of discrimination playing a role in influencing recruitment or other aspects of your operational environment, and evaluates the adequacy of measures to prevent the involvement by personnel in such practices?				42