

Analysis of ISO 9001:2015 against the ICoCA Certification Assessment Framework

As detailed in the ICoCA Certification Procedure, the Board of Directors assesses and recognizes standards for potential recognition as a pathway towards ICoCA Certification. The purpose for the assessment is to determine the extent to which a standard is consistent with the Code, and to define the additional information relative to the human rights and humanitarian law impact of PSC operations that the Board needs to assess whether a company's systems and policies meet the requirements of the Code.

On 11 September 2015, the Board of Directors received a request from an ICoCA member that the Association evaluate the standard ISO 9001:2015 (hereafter "ISO 9001"), coupled with a "Human Rights Due Diligence Process and a Human Rights Impact Assessment," for potential recognition pursuant to the ICoCA's Certification Procedure. In accordance with the ICoCA Certification Procedure, the Secretariat has conducted a preliminary analysis of ISO 9001 using the analytical matrix referred to in the Certification Procedure.

The following document sets out the ICoCA Board of Directors' analysis of ISO 9001, using the matrix published with the Certification Procedure. It shows the differences between the coverage of that standard and the Code. The new version of ISO 9001 represents a significant advance over prior versions in that it incorporates specific risk-management processes. However, a significant gap remains between the coverage of the standard and the Code, particularly with respect to the human rights and humanitarian law-specific provisions of the Code.

Accordingly, the Board has decided that further assessment and administration of the additional information that would be required for ISO 9001 to be recognized would be impractical at this time.

Preliminary Analysis of ISO 9001:2015 against the ICoCA Certification Assessment Framework

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Comments highlighted in yellow are linked to additional information requirements

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

Requirement Category	System/Policy Category	Objective Questions	ICoC Ref	ISO 9000/9001 (2015)	Comments re Standard/ICoC alignment
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<u>1. Governance / Oversight Framework</u>			3, 6, 17, 44		
	<u>1.1 Risk Assessment Program(s)¹</u>		3, 6		
		Does the standard require the company have a program to conduct risk assessments?		ISO 9000/2.2.2 ISO 9001/0.3.1; 0.3.2; 0.3.3; 4.4.1.f; 6.1	ISO 9001 0.3.3 states that “ <u>risk-based thinking is essential for achieving an effective quality management system. The concept of risk-based thinking (...) includ[es], for example, carrying out preventive action to eliminate potential nonconformities, analysing any nonconformities that do occur, and taking action to prevent recurrence that is appropriate for the effects of the nonconformity. [...], an organization needs to plan and implement actions to address risks and opportunities. Addressing both risks and opportunities establishes a basis for increasing the effectiveness of the quality management system, achieving improved results and preventing negative effects.</u> ” ISO 9001 specifies requirements for the organization to <u>understand its context</u> (see 4.1) and <u>determine risks as a basis for planning</u> , as described in 6.1, where it is stated that the organisation shall determine the risks and opportunities that need to be addressed to: a) give assurance that the quality management system can achieve its

¹ 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)).

- intended result(s);
- b) enhance desirable effects;
- c) prevent, or reduce, undesired effects;
- d) achieve improvement.

6.2 States that the organization shall plan:

- a) actions to address these risks and opportunities;
- b) how to:
 - 1) integrate and implement the actions into its quality management system processes (see 4.4);
 - 2) evaluate the effectiveness of these actions.

Actions taken to address risks and opportunities shall be proportionate to the potential impact on the conformity of products and services.

Annex A.4 states that, “although 6.1 specifies that the organization shall plan actions to address risks, there is no requirement for formal methods for risk management or a documented risk management process. Organizations can decide whether or not to develop a more extensive risk management methodology than is required by this International Standard, e.g. through the application of other guidance or standards.”

ISO 9000 2.2.2 states that the purpose of the standard is to help companies implement a quality management system (QMS), “provides the means to identify actions to address intended and unintended consequences in providing products and services”.

The implementation of a QMS inherently includes the use of a risk assessment logic that feeds the managements processes although the standard does not require an extensive risk assessment programs methodology.

ISO 9000 2.2.2 defines QMS as “activities by which the organization identifies its objectives, determines the processes and resources to

				<p>achieved desired results”. <u>“A QMS provides the means to identify actions to address intended and unintended consequences in providing products and services”.</u></p> <p>ISO 9001 0.3.1 states that “the process approach involves the systematic definition and management of processes, and their interactions, so as to achieve the intended results in accordance with the quality policy and strategic direction of the organization. Management of the processes (“process approach”) and the system as a whole can be achieved using the PDCA –plan-do-check-act- cycle (see 0.3.2) with <u>an overall focus on risk-based thinking (see 0.3.3) aimed at taking advantage of opportunities and preventing undesirable results”.</u></p>
		Does the standard require sufficient participation in the required risk assessment program by senior operational and field management personnel?	<p>ISO 9000/ 3.1.1; 2.3.2.1</p> <p>ISO 9001/ 5.1; 5.3</p>	<p>The standard requires the “leadership/top management” to demonstrate a leading role and commitment in implementing the QMS, “top management” being defined as “person or group of people who directs and controls the organization at the highest level” (ISO 9000/3.1.1).</p> <p>However, the involvement of “top management” does not explicitly refer to the participation of senior operational and field management personnel in the risk assessment program.</p> <p>ISO 9000/2.3.2.1 states that “leaders at all levels establish unity of purpose and direction and create conditions in which people are engaged in achieving the organization’s quality objectives”.</p> <p>5.1 requires that the top management “demonstrates leadership and commitment with respect to the quality management system” by, in particular, “promoting the use of the process approach and risk-based thinking” and by “ensuring that the resources needed for the quality management system are available”.</p> <p>5.3 requires that top management “assigns responsibility and authority for ensuring that the QMS conforms to the requirements of the standard, ensuring that the processes are delivering their intended outputs, and</p>

				reporting on opportunities for improvement (...)"
		Does the standard require that the company's risk assessment program cover human rights and humanitarian law related risks?		<p>8.3.3.e; 8.4.2.c; 8.5.5.b</p> <p>The standard requires the organization to consider potential undesired consequences related to their products and services, and to ensure that external processes do not affect the organization's compliance with customer demands and law requirements.</p> <p>However, there is no explicit requirement in the standard to include human rights and humanitarian law related risks neither in the company's risk assessment program nor in the "process approach".</p> <p>8.3.3.e) requires the organization to "consider the potential consequences of failure due to the nature of the products and services".</p> <p>8.4.2 requires the organization to "take into consideration the potential impact of the externally provided processes, products and services on the organization's ability to consistently meet customer and applicable statutory and regulatory requirements" and to ensure that they do not affect the "organization's ability to consistently deliver conforming products and services to its customers".</p> <p>8.5.5.b) requires the organization to consider, as part of its post delivery activities; "the potential undesired consequences associated with its products and services".</p>
		Does the standard require a program to conduct impact assessments of ongoing operations, including HRs and IHL?	6 d	<p>8.1; 8.3.3.e; 8.4.2.b; 8.5.5.b; 9.1.3</p> <p>The standard requires the organization to consider potential undesired consequences related to products and services, to act upon planned and unintended changes, and to periodically measure the performance of the organization and the effectiveness of the quality management system</p> <p>However, the standard does not explicitly require conducting an "impact assessment" of ongoing operations, and does not mention human rights and IHL.</p> <p>8.1 requires the organization to "control planned changes and review the</p>

				<p>consequences of unintended changes, taking action to mitigate any adverse effects, as necessary”.</p> <p>8.3.3.e) requires the organization to consider “potential consequences of failure due to the nature of the products and services”.</p> <p>8.4.2.c) requires the organization to take into consideration “the potential impact of the externally provided processes, products and services on the organization’s ability to consistently meet customer and applicable statutory and regulatory requirements”.</p> <p>8.5.5.b) requires the organization to consider, in determining the extent of post-delivery activities, “the potential undesired consequences associated with its products and services”.</p> <p>9.1.3 requires the organization to “analyze and evaluate appropriate data and information arising from monitoring and measurement”, including “conformity of products and services; the degree of customer satisfaction; the performance and effectiveness of the quality management system; if planning has been implemented effectively; the effectiveness of actions taken to address risks and opportunities; the performance of external providers; the need for improvements to the quality management system”.</p>	
	<u>1.2 Compliance Program</u>				
		Does the standard require that all applicable policies be applied to Contractors and Suppliers providing security services?	16	<p>ISO 9000/3.4.6</p> <p>ISO 9001/A.8; 8.1; 8.4.1; 8.4.2.d</p>	<p>The standard requires companies to control their outsourced processes and that all “externally provided processes” conform to “requirements”.</p> <p>However, the standard does not mention that all applicable policies be applied to contractors and suppliers providing “security services”, to which the standard does not make a reference.</p> <p>ISO 9000/3.4.6 defines “outsource” as making “an arrangement where an external organization performs part of an organization’s function or process”.</p>

				<p>A.8 defines the forms of “externally provided processes, products and services”, whether being “purchasing from a supplier; an arrangement with an associate company; outsourcing processes to an external provider”.</p> <p>8.1 requires the organization to “ensure that outsourced processes are controlled”.</p> <p>8.4.1 requires the organization to “ensure that externally provided processes, products and services conform to requirements” and criteria that are determined and applied by the organization itself.</p> <p>8.4.2.d) requires the organization to “determine the verification, or other activities, necessary to ensure that the externally provided processes, products and services meet requirements”.</p>
		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?	22, 57	The Standard does not refer to UN Security Council Resolutions.
		Does the standard require a company to have a process to evaluate and prohibit the practices described in ICoC Paragraph 22?	22	<p>8.4.2.b; 8.5.1; 8.7.1</p> <p>The standard requires “controlled conditions” in the provision of products and services and envisages the identification and correction of non conformity, which can be understood as an evaluation and prohibition of practices that go against requirements.</p> <p>However, the standard does not make any reference to the Code and does not require PMSCs to have a process to evaluate and prohibit the practices described in paragraph 22 of the ICoC.</p> <p>8.4.2.b) requires the organization to “define the controls that it intends to apply to (...) the resulting outputs”.</p> <p>8.5.1 requires the organization to implement production and service provision under controlled conditions.</p>

				8.7.1 requires that the “outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery”. The organization shall then take appropriate action, including through correction.
		Does the standard require that a company maintains awareness of all reporting requirements?	22, 24, 28, 63	<p>7.3; 7.5.1; 8.2.1; 8.5.3; 8.7.2</p> <p>The standard requires the organization to report in the case where the property of a customer or external provider is lost or damaged. The standard also requires the company to retain “documented information” in case of non-conformity of a product or service, and to ensure customer communication, including by getting feedbacks.</p> <p>However, the standard does not require systematic incident or non conformance reporting, and in particular does not introduce ICoC or human rights requirements.</p> <p>7.3 requires the organization to “ensure that persons doing work under its control are aware of the quality policy; the relevant quality objectives;” and the importance of improvement, which reporting can be a part.</p> <p>7.5.1 requires the organization QMS to include documented information, which can be understood as records.</p> <p>8.2.1 defines customer communication, in particular by determining that it includes “providing information related to products and services, (...) and obtaining customer feedbacks”.</p> <p>8.5.3 states that “when the property of a customer or external provider is lost, damaged or otherwise found to be unsuitable for use, the organization shall report this to the customer or external provider and retain documented information on what has occurred”.</p> <p>8.7.2 requires the organization, in case of non conformity of a product or service, to “retain documented information that describes the nonconformity (non confirming outputs); describes the actions taken;</p>

				describes any concessions obtained; identifies the authority deciding the action in respect of the nonconformity”.
		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	<p>5.1.2; 8.2.2; 8.2.3; 8.3.3</p> <p>The standard does not specifically mention licenses, but does require that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” and consistently meet them.</p> <p>5.1.2 requires that the company’s top management “demonstrate leadership and commitment (...) by ensuring that customer and applicable statutory and regulatory requirements are determined, understood and consistently met”.</p> <p>8.2.2 and 8.2.3 require the organization to “ensure that the requirements for the products and services to be offered to customers are defined, including any applicable statutory and regulatory requirements” and the organization has the ability to meet those requirements.</p> <p>8.3.3 requires the organization to “determine the requirements essential for the specific types of products and services to be designed and developed”, including statutory and regulatory requirements.</p>
		Does the standard require a company to have a process to ensure that the goods and services they provide are not derived from HR or IHL violations?	25	<p>5.1.2; 8.5.1; 8.5.2; 8.5.5;</p> <p>The standard requires that the company provides products and services under “controlled conditions”, to identify and trace products and services to ensure their conformity to requirements to prevent their unintended use or provision.</p> <p>However, the Standard does not include any provision requiring a company ensuring that its products and services are not derived from HR and IHL violations.</p> <p>5.1.2 requires that top management ensures that (...) “applicable statutory and regulatory requirements are determined, understood and consistently met”.</p> <p>8.5.1 requires the organization to “implement production and service</p>

				<p>provision under controlled conditions”, detailing the controlled conditions that are included.</p> <p>8.5.2 requires the organization to “use suitable means to identify outputs when it is necessary to ensure the conformity of products and services”, controlling the “unique identification of the outputs when traceability is a requirement” and “retaining the necessary documented information to enable traceability”.</p> <p>8.5.5 identifies post-delivery activities’ requirements associated with the products and services, in particular: “statutory and regulatory requirements and the potential undesired consequences associated with its products and services”.</p> <p>8.7.1 requires the organization to “ensure that outputs that do not conform to their requirements are identified and controlled to prevent their unintended use or delivery” and to “take appropriate action based on the nature of the nonconformity and its effect on the conformity of products and services”.</p>
		Does the standard require a company to have an anti-corruption policy or program?	26	<p>8.1</p> <p>The standard requires that the organization implements processes needed to meet the requirements, which can include programs and policy such as anti-corruption policy.</p> <p>However, the Standard does not explicitly require a company to have an anti-corruption policy or program.</p> <p>8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services.</p>
		Does the standard require that the company have all required authorizations and licenses to use and maintain weapons and	56, 43(c)	<p>8.2.2; 8.2.3; 8.3.3</p> <p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services”.</p> <p>However, the Standard does not include any explicit provision regarding</p>

		ammunition, and hazardous materials?			<p>licensing, storage, possession, use, maintenance and disposal of weapons, ammunitions and/or hazardous materials.</p> <p>8.2.2 and 8.2.3 require the organization to “ensure that the requirements for the products and services to be offered to customers are defined, including any applicable statutory and regulatory requirements” and the organization has the ability to meet those requirements.</p> <p>8.3.3 requires the organization to “determine the requirements essential for the specific types of products and services to be designed and developed”, including statutory and regulatory requirements.</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)	8.2.2; 8.2.3; 8.3.3	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” (8.2.2, 8.2.3, 8.3.3 see question above).</p> <p>However, the Standard does not include any explicit provision regarding vehicles, registration, licensing or security of vehicles.</p>
		Does the standard require that all vehicles be individually identifiable while on duty?	43(b)	8.2.2; 8.2.3; 8.3.3	<p>The standard requires that the organization define “any applicable (...) requirements applicable to products and services” (8.2.2, 8.2.3, 8.3.3 see question above).</p> <p>However, the Standard does not include any explicit provision regarding vehicles, registration, licensing or security of vehicles (see question above).</p>
		Does the standard require that all personnel be individually identifiable while on duty?	43(a)	8.2.2; 8.2.3; 8.3.3	<p>The standard requires that the organization define “any applicable (...) requirements applicable to products and services” (8.2.2, 8.2.3, 8.3.3 see question above).</p> <p>However, the standard does not explicitly refer to identification of personnel while on duty.</p>
		Does the standard require the company to ensure that all weapons transfers are conducted in accordance with applicable laws and UN Security Council requirements,	57	8.2.2; 8.2.3; 8.3.3	<p>The standard requires that the organization define “any applicable statutory and regulatory requirements applicable to products and services” (8.2.2, 8.2.3, 8.3.3 see question above).</p> <p>However, the Standard does not include any explicit provision in this</p>

		including sanctions?			regard, in particular does not refer to the UNSC requirements or sanctions.
		Does the standard require a policy concerning the prohibition of possession and use of illegal weapons and ammunition under any applicable law?	57	8.2.2; 8.2.3; 8.3.3	The standard requires that the organization define “any applicable (...) requirements applicable to products and services” (8.2.2, 8.2.3, 8.3.3 see question above). However, the Standard does not include any explicit provision regarding the prohibition of the possession and use of illegal weapons and ammunitions.
		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 and the ICoC?	52	7.2; 8.1	The standard requires that the organization implements processes necessary to meet the requirements, which can include programs and policy such as hiring policies. However, the standard does not explicitly refer to hiring policies, conditions of work, labour law or the conditions set by the ICoC. The standard’s only requirement is competence. 7.2 requires the organization to “determine the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the quality management system; ensure that these persons are competent on the basis of appropriate education, training, or experience; and where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken”. 8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services.
	<u>1.3 Reporting Procedures</u>				
		Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be	24,28, 63	8.2.1; 8.7.2	The standard requires the company to retain “documented information” in case of non-conformity of a product or service, and to ensure customer communication, including by providing information to the customer.

		reported to the client?		<p>However, the standard does not include any explicit provision regarding reporting to the client whereby known or reasonably suspected national or international crimes.</p> <p>8.2.1 defines customer communication, in particular by determining that it includes “providing information related to products and services, (...) and obtaining customer feedbacks”.</p> <p>8.7.2 requires the organization, in case of non conformity of a product or service, to “retain documented information that describes the nonconformity (non confirming outputs); describes the actions taken; describes any concessions obtained; identifies the authority deciding the action in respect of the nonconformity”.</p>
		Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be reported to a Competent Authority?	8.7.2	<p>The standard requires to “retain documented information that identifies the authority deciding the action in respect of the nonconformity” of a product or service (8.7.2).</p> <p>However, the standard does not include any explicit provision regarding reporting to a Competent Authority whereby known or reasonably suspected national or international crimes.</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?		<p>The standard does not include any provision regarding reporting to the country of nationality of the victim or the perpetrator or country where the act took place whereby known or reasonably suspected national or international crimes.</p>
		Does the required reporting program include each of the practices or behaviours described in paragraph 22 of the ICoC.	8.7.1	<p>The standard requires taking appropriate action when a product or service is not conforming to requirements.</p> <p>However, the standard does not include any explicit provision regarding reporting on any of the practices or behaviours described in paragraph 22 of the ICoC.</p>

				8.7.1 requires the organization to take appropriate action based on the nature of the non conformity of products and services, including during and after the provision of services.
		Does the required reporting program include a requirement to report violations of the Code?		The standard does not include any provision regarding reporting violations of the ICoC.
		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?	8.7.2	<p>The standard requires the company to retain “documented information” in case of non-conformity of a product or service.</p> <p>However, the standard does not ensure systematic incident reporting in any of the cases of incidents described in paragraph 63 of the ICoC.</p> <p>8.7.2 requires the organization, in case of non conformity of a product or service, to “retain documented information that describes the nonconformity (non confirming outputs); describes the actions taken; describes any concessions obtained; identifies the authority deciding the action in respect of the nonconformity”.</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?	8.5.2; 9.2	<p>The standard mentions the provision for companies to conduct internal audits to support internal evaluations of performance in relation with the quality management system of the company (9.2). Also, the standard requires the organization to use suitable means to ensure conformity of outputs (8.5.2).</p> <p>However, the standard does not require a company to process an internal inquiry in case of incidents described in paragraph 63 of the Code.</p>
		Does the standard require an incident report to include each of the following: <ul style="list-style-type: none"> • time and location • identity and nationality of persons involved (including address and contact details) 	8.7.2	<p>The standard requires the organization to retain documentation in case of non conformity of a product or service, where only the category “measures taken by the company in response” is addressed. However, the standard does not explicitly require incident reporting.</p> <p>8.7.2 requires the organization to “retain documented information that describes the nonconformity; describes the actions taken; describes any</p>

		<ul style="list-style-type: none"> • injuries and damages sustained • circumstances leading up to the incident; and • measures taken by the company in response. 			concessions obtained; identifies the authority deciding the action in respect of the nonconformity”.
	<u>1.4 Contracting Policies/Programs</u>		16-20, 22, 23		
		Does the standard ensure that the company requires Code compliance in its contracts with all contractors or subcontractors?		8.1; 8.4.1; 8.4.2.d	<p>The standard tends to find ways to “achieve conformity” in the provision of products and services, for example by requiring a company to control their outsourced processes and that all “externally provided processes” conform to “requirements”.</p> <p>However, the standard does not include any explicit provision regarding compliance with the Code forming part of the company’s relationship with contractors and subcontractors.</p> <p>8.1 requires the organization to “ensure that outsourced processes are controlled”.</p> <p>8.4.1 requires the organization to “ensure that externally provided processes, products and services conform to requirements”.</p> <p>8.4.2.d) requires the organization to “determine the verification, or other activities, necessary to ensure that the externally provided processes, products and services meet requirements”.</p>
		Does the standard require the company to have a process to ensure that it does not enter into contracts where performance would directly and materially conflict with <ul style="list-style-type: none"> • the Code; • applicable national or international 			The standard does not include any provision in this regard. (see question above).

		<p>law;</p> <ul style="list-style-type: none"> • applicable local, regional and international human rights law. 			
		<p>Does the standard require a process to review contracts and ensure there is no conflict with the Code?</p>			<p>The standard requires the company to ensure conformity of externally provided processes, which can also be understood as including outputs like contracts with external processes.</p> <p>However, the standard does not include any explicit provision regarding review of contracts to ensure that they are not in conflict with the Code.</p> <p>8.4.2.d) requires the organization to “determine the verification, or other activities, necessary to ensure that the externally provided processes, products and services meet requirements”.</p>

<p>2. Personnel Management Policies and Procedures</p>				
	<p>2.1 Hiring and Selection of Personnel</p>		<p>45, 48, 49, 50-54</p>	
		<p>Does the standard require the company to have a verifiable vetting program for all Personnel?</p>		<p>7.2; 8.4.3</p> <p>The standard requires the company to ensure that the personnel are competent, competences being defined by the company itself.</p> <p>However, the standard does not explicitly require the company to have a verifiable vetting program for all personnel.</p> <p>7.2 requires the company to “determine the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the quality management system, and ensure that these persons are competent on the basis of appropriate education, training, or experience”.</p> <p>8.4.3 requires the organization to communicate its requirements to external providers regarding competence, including any required qualification of persons.</p>
		<p>Does the standard require that the vetting process applies to both to new hires and promotions to new positions?</p>		<p>The standard does not include any explicit requirement regarding the frequency of vetting processes.</p>
		<p>Does the standard require that all personnel be checked to ensure that they are qualified as defined by</p> <ul style="list-style-type: none"> • the contract; • applicable national law; • industry standards; and • the principles of the ICoC? 	<p>5.1.2; 7.2; 8.3.3</p>	<p>The standard requires the company to determine the necessary competence of personnel doing work under its control, and ensure that this personnel is competent (7.2, see question above).</p> <p>But the standard does not include any provision regarding qualifications defined by the contract, applicable national law, industry standards and/or the principles of the Code.</p> <p>5.1.2 requires that top management ensures that (...) “applicable statutory and regulatory requirements are determined, understood and consistently met”.</p> <p>8.3.3 requires the organization to “determine the requirements</p>

					essential for the specific types of products and services to be designed and developed”, including statutory and regulatory requirements.
		Does the standard require that the company refrain from hiring personnel under the age of 18 to perform Security Services?		5.1.2; 8.3.3	The standard requires that the company provides products and services under “controlled conditions” (5.1.2 and 8.3.3 see question above). However, the standard does not introduce any explicit requirements regarding hiring of personnel. Therefore, there is no provision regarding minimal age.
		Does the standard require the company to obtain authorization to access all personnel, government and employment records?		5.1.2; 7.2; 7.5.3.2	The standard requires companies to “retain appropriate documented information as evidence of competence” of persons (7.2), which can be interpreted as employment records or other relevant records. The company has to decide the provisions regarding distribution, access, retrieval and use of this documented information (7.5.3.2) and to ensure that applicable requirements are met (5.1.2). However, the standard does not include any requirement regarding vetting processes, in particular regarding the possibility for the company to access prior employment and service records, as appropriate.
		Does the standard require that company personnel agree to participate in internal and external investigations and disciplinary procedures?			The standard does not include any explicit provision regarding personnel agreeing to participate in internal or external investigations.
		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?	42	8.1	The standard requires that the organization implements processes necessary to meet the requirements, which can include programs and policy such as the policies mentioned, including hiring policies. However, the standard does not introduce any explicit requirements regarding hiring of personnel. Therefore, there is no provision regarding anti-discrimination policy.

				8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services.
		Does the standard require that a company ensure personnel who carry weapons are checked to ensure that they have not: <ul style="list-style-type: none"> • been convicted of a crime that would indicate lack of character and fitness to perform Security Services in a manner consistent with the ICoC; • been dishonourably discharged; • had other employment terminated for documented violations of any of the principles of the ICoC; or • had other history of conduct that (according to an objectively reasonable standard) brings into question their fitness to carry a weapon. 	48	8.4.2.b; 8.5.1 The standard requires “controlled conditions” in the provision of products and services. However, the standard does not include any explicit requirements regarding screening procedures of personnel. 8.4.2.b) requires the organization to “define the controls that it intends to apply to (...) the resulting outputs”. 8.5.1 requires the organization to implement production and service provision under controlled conditions.
	2.2 Performance Review Process		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?		5.3; 9 The standard is about helping the company to develop and achieve a quality management system that will allow the company to improve its performance. However it does not specifically address personnel performance reviews or personnel management. 5.3 requires the top management to “assign the responsibility and authority for reporting on the performance of the quality management system and on opportunities for improvement”.

					9. is entirely dedicated to performance evaluation of the quality management system, detailing in particular the scope and process, provisions regarding customer satisfaction, analysis and evaluation, internal audit and management review.
		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?		9	The Standard requires conducting performance evaluation (9). However it does not refer to the principles of the ICoC, physical and mental fitness standards or even to specific personal performance requirements.
	2.3 Subcontractor Hiring		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?		7.3	The standard requires the organization to ensure awareness about the QMS and the consequences of non conformity (7.3). However, the standard does not explicitly require the company to provide the ICoC to all personnel and subcontractors providing security services and to require that they act accordingly.
		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?		8.1; 8.4.1; 8.4.2.d	The standard requires the organization to ensure that outsourced processes are controlled and conform to requirements. However, the standard does not explicitly require the company to ensure that selection; vetting and training procedures are conducted in accordance with the Code, either by the subcontractor or by the company when the subcontractor cannot conduct it. 8.1 requires the organization to "ensure that outsourced processes are controlled". 8.4.1 requires the organization to "ensure that externally provided processes, products and services conform to requirements". 8.4.2.d) requires the organization to "determine the verification, or

					other activities, necessary to ensure that the externally provided processes, products and services meet requirements”.
	2.4 Employment Practices/Terms and Conditions of Work		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?		7.2; 8.1	<p>The standard requires that the organization implements processes necessary to meet the requirements, which can include programs and policy such as the policies mentioned. The only explicit requirement the standard requires is competence.</p> <p>However, the standard does not explicitly refer to hiring policies, conditions of work, labour law or the conditions set by the ICoC.</p> <p>7.2 requires the organization to “determine the necessary competence of person(s) doing work under its control that affects the performance and effectiveness of the quality management system; ensure that these persons are competent on the basis of appropriate education, training, or experience; and where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken”.</p> <p>8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services.</p>
		Does the standard require that relevant employment reference materials, such as employment contracts, incorporate the Code and applicable labour law?		8.3.3	<p>The standard requires defining and meeting requirements. However, the Standard does not explicitly require the incorporation of the ICoC or applicable labour law in relevant employment reference materials.</p> <p>8.3.3 requires the organization to “determine the requirements essential for the specific types of products and services to be designed and developed”, including statutory and regulatory requirements.</p>

		Does the contract require that all terms and conditions of employment are available to personnel in writing, in a language they can understand?	4.1; 8.3.3	<p>The standard requires understanding “the context of the organization for it to be relevant to its purpose and strategic direction”, specifying that “understanding the external context can be facilitated by considering issues arising from legal, technological, competitive, market, cultural, social and economic environments, whether international, national, regional or local” (4.1). Also, it requires defining and meeting requirements (8.3.3).</p> <p>The standard does not explicitly require that all terms and conditions of employment be available in writing, in a language they understand.</p>
		Does the standard require that employment records and reports be kept for all personnel during and for at least 7 years after employment?	7.2	<p>The standard requires “retain appropriate documented information as evidence of competence” of persons (7.2), which can be interpreted as employment records or other relevant records.</p> <p>However, the standard does not explicitly require that employment records, reports and/or documented information be kept for at least 7 years after employment.</p>
		Does the standard require that the company make employment records accessible to ICoCA or a Competent Authority, except where prohibited by law?		<p>The standard does not include any provision in this regard.</p>
		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?	8.3.3	<p>The standard requires defining and meeting requirements (8.3.3). However, the standard does not explicitly any provision regarding administrative processing.</p>

3. Rules for the Use of Force			29-32	
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		Does the standard require that a company have guidance or general policies covering Rules for the Use of Force?	8.1; 8.3.3	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes.</p> <p>However, the standard does not make explicit reference to security services, and in particular does not make reference to requirements related to the Rules for the Use of Force (RUF).</p> <p>8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services.</p> <p>8.3.3 requires the organization to “determine the requirements essential for the specific types of products and services to be designed and developed”, including statutory and regulatory requirements.</p>
		Does the standard require that company guidance regarding the use of force is checked for consistency with applicable law?	8.1; 8.3.3	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above). However, the standard does not include any explicit provision regarding the use of force.</p>
		Does the standard require that a company’s RUF and guidance incorporate concepts of necessity, proportionality and appropriateness?	8.1; 8.3.3	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above).</p> <p>However, the standard does not include any explicit provision regarding the use of force, in particular regarding proportionality and appropriateness.</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?	8.1; 8.3.3	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above).</p> <p>However, the standard does not include any explicit provision</p>

					regarding the use of force, in particular regarding the use of firearms.
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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?		8.1; 8.3.3	The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above). However, the Standard does not include any explicit provision regarding procurement of, storage, possession, use, maintenance and disposal of weapons, ammunitions and/or materials of war.
		Does the standard require that a company have all required authorizations for possession and use of weapons, ammunition, and material of war?	56,60	8.1; 8.3.3	The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above). However, the Standard does not include any explicit provision regarding licensing, storage, possession, use, maintenance and disposal of weapons, ammunitions and/or materials of war.
		Does the standard require that a company ensure there is no unauthorized or altered, illegal weapons or material of war?	57,61	8.1; 8.3.3	The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above). However, the Standard does not include any explicit provision regarding the possession and use of illegal weapons, ammunitions and/or materials of war.
		Does the standard require that a company ensure all weapons and materials of war transfers and transactions in are in accordance with	57,61	8.1; 8.3.3	The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above).

		applicable law and UN Security Council and sanctions?			However, the Standard does not include any explicit provision transfers and transactions of weapons and materials of war in accordance with UNSC requirements or sanctions.
		Does the standard require policies for management of weapons and ammunition that include: <ul style="list-style-type: none"> • secure storage • controls over their issue • records regarding to whom and when weapons are issued • identification and accounting for all ammunition • verifiable and proper disposal. 	58,62	8.1; 8.3.3	The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1 and 8.3.3 see question above). However, the Standard does not include any explicit provision regarding identification, storage, recording, possession, use and disposal of weapons, ammunitions and/or materials of war.

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?		8.1; 8.2.1	The standard requires customer feedback and to definition of processes that allow to meet the requirements. However, the standard does not explicitly require a company to have a complaint or grievance mechanism for personnel and third parties to report violations of the Code or violations of human rights. 8.1 requires the organization to plan, implement and control the processes needed to meet the requirements for the provision of products and services”, and to implement the planning of the QMS by determining the requirements for the products and services. 8.2.1 requires “communication with customers, including by obtaining feedback relating to products and services, including customer complaints”; but it does not apply to personnel or third parties.

		Does the standard require the company to have a grievance procedure that facilitates reporting of improper or illegal conduct, both internally and, where appropriate, to Competent Authorities?	8.1	<p>The standard requires that the organization defines “any applicable statutory and regulatory requirements applicable to products and services” as well as processes (8.1).</p> <p>The standard does not include any requirement for the company to have procedures to document and report improper or illegal conduct that could be filed internally or to a Competent Authority.</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?	0.3.3; 10	<p>The standard includes provisions regarding avoiding recurrence of non conformity. However, the standard does not require a company to have a fair and accessible complaint or grievance mechanism.</p> <p>0.3.3 states that risk-based thinking, which is essential for achieving an effective quality management system, can include “carrying out preventive action to eliminate potential nonconformities (...) and taking action to prevent recurrence that is appropriate for the effects of the nonconformity”.</p> <p>10 requires improvement, including “through correction and corrective action (...)” without undue delay.</p>
		Is the process published on a publically accessible website?		The standard does not require a company to have a complaint or grievance mechanism that is publically accessible on a website.
		Does the procedure allow for investigations, and are the investigations prompt, impartial, and taken with consideration to confidentiality?	8.5.2	<p>The standard requires that the company provides products and services under “controlled conditions”, to identify and trace products and services to ensure their conformity to requirements to prevent their unintended use or provision.</p> <p>However, the standard does not ensure that investigations are impartial and confidential concerning grievance mechanism.</p> <p>8.5.2 requires the organization to “use suitable means to identify outputs when it is necessary to ensure the conformity of products and services”, controlling the “unique identification of the outputs when traceability is a requirement” and “retaining the necessary documented information to enable traceability”.</p>

		Does the standard require that records be kept of allegations, findings and disciplinary measures?	8.7.2	<p>The standard requires the company to “retain documented information that describes the nonconformity; describes the actions taken; describes any concessions obtained; identifies the authority deciding the action in respect of the nonconformity” (8.7.2).</p> <p>However, the standard does not explicitly require the company to keep records of allegations, findings and disciplinary measures. However, it does require retaining “documented information” about nonconformity.</p>
		Does the standard require cooperation with offices conducting investigations, and that grievance records be available to Competent Authorities (except as provided by applicable law)?	7.4; 8.7.2	<p>The standard requires to identify the appropriate authorities with whom to communicate (7.4) and to “retain documented information that identifies the authority deciding the action in respect of the nonconformity” of a product or service (8.7.2).</p> <p>However, the standard does not explicitly require neither cooperation with offices that conduct investigations nor accessibility of the records to Competent Authorities.</p>
		Does the standard require that the grievance procedure prevent impeding of witnesses, testimony, or investigations to grievances?		<p>The standard does not include any requirement on preventing the intimidation of witnesses or the inhibition of the gathering of evidence.</p>
		Does the standard require that the grievance procedure provide for disciplinary measures, including termination of contracts?	0.3.3; 10	<p>The standard includes provisions regarding avoiding recurrence of non conformity. However, the standard does not explicitly require a company to have a complaint or grievance mechanism that provide disciplinary measures.</p> <p>0.3.3 states that risk-based thinking, which is essential for achieving an effective quality management system, can include “carrying out preventive action to eliminate potential nonconformities (...) and taking action to prevent recurrence that is appropriate for the effects of the nonconformity”.</p> <p>10 requires improvement, including “through correction and corrective action (...)” without undue delay.</p>

		Does the standard require that a company have a process to provide protection against retaliation for personnel who report wrongdoings in good faith?			The standard does not include any requirements in this regard.
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6. HSE Program			64		
		Does the standard require that a company endeavour to provide a healthy and safe working environment?			The standard does not include requirements related to HSE, in particular on conditions of work, as stated in the introduction (0.4) "This International Standard does not include requirements specific to other management systems, such as those for environmental management, occupational health and safety management, or financial management".
		Does the standard require that a company provide precautions to protect staff in high-risk or life threatening operations?			The standard does not include requirements related to HSE, in particular on conditions of work.
		Does the standard require that a company assess and/or address each of the following: <ul style="list-style-type: none"> • Assessing risk of injury to personnel; • Risk of injury to local populations; • Hostile Environment threats ; • Appropriate PPE ; • Appropriate weapons and ammunition ; • Medical support ; • Psychological health ; • Deterrence of workplace violence ; • Misconduct ; and • alcohol or drug abuse. 			The standard does not include requirements related to HSE, in particular on incident reporting.

7. Insurance /Liability Coverage			69		
		Does the standard require evidence of sufficient coverage of financial capacity to meet commercial liabilities?		5.1.2	<p>The standard requires the organization’s top management to ensure conformity with customer and applicable requirements.</p> <p>However, the standard does not explicitly include requirements regarding insurance coverage and related financial liabilities.</p> <p>5.1.2 requires that the company’s top management “demonstrate leadership and commitment (...) by ensuring that customer and applicable statutory and regulatory requirements are determined, understood and consistently met”.</p>

Requirement Category	System/Policy Category	Objective Questions	ICoC Ref	ISO 9001 (2015)	Comments re ICoC alignment
Training Programs and Curriculum	Training Requirements		16, 27, 55, 59		
		Does the standard require a training program that applies to all personnel (including contractors and subcontractors)?	16, 55	7.2; 7.3	<p>The standard does not require the company to have a training program that applies to all personnel, including contractors and subcontractors. In particular, the standard does not refer to HRL, IHL, the Code or applicable local and international law.</p> <p>The standard does refer to training in a “note” of 7.2 as an example of actions that can be taken, as applicable, to allow personnel to acquire the necessary competence.</p> <p>Also, 7.3 requires the organization to “ensure that persons doing work under the organization’s control are aware of the quality policy; relevant quality objectives; their contribution to the effectiveness of the quality management system, including the benefits of improved</p>

					performance; the implications of not conforming with the quality management system requirements”.
		Is the training program documented, and does it require that the company keep all records of attendance and results, including practical exercises?	55	7.5.1	The standard does not require the company to document all training programs, including regarding their attendance, results and practical exercises. However, 7.5.1 requires that the organization’s quality management system include “documented information determined by the organization as being necessary for the effectiveness of the quality management system”.
		Does the standard require that a company have a training program that provides both initial and recurrent training?	55, 59		The standard does not include any provision in this regard.
	<u>Mandatory Subjects for Training:</u>				
		Does the standard require the company conduct training on each of the following			
		1. the ICoC?	27,55		The standard does not include any provision in this regard.
		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 include any provision in this regard.
		3. Rules for the Use of Force, including: <ul style="list-style-type: none"> • legal restrictions • proportionality • appropriateness • use only in self-defense or defense 	29-31,59		The standard does not include any provision in this regard.

		of others?		
		4. Reporting Obligations	24, 28, 34, 37, 38, 39, 63	The standard does not include any provision in this regard.
		5. Awareness of Specific Human Rights/ Prohibited Practices described in paragraphs 22 and 23 of the ICoC	22-23	The standard does not include any provision in this regard.
		6. Anticorruption	26	The standard does not include any provision in this regard.
		7. Applicable law		The standard does not include any provision in this regard.
		8. Type and model of weapon carried – regular, verified, and recurrent	59	The standard does not include any provision in this regard.
		9. Hostile Environment Training		The standard does not include any provision in this regard.
		10. If contract covers law enforcement duties or support to national law enforcement: <ul style="list-style-type: none"> • Laws applicable to enforcement of that state • UN Basic Principles on Use of Force and Firearms by Law Enforcement Officials. 	32	The standard does not include any provision in this regard.
		11. If contract involves detention duties: <ul style="list-style-type: none"> • Applicable national and international laws; • Prohibition on torture and other cruel and inhumane or degrading treatment. 		The standard does not include any provision in this regard.
		12. When Apprehension is required in the course of protecting persons or property: <ul style="list-style-type: none"> • When apprehension is permitted; 		The standard does not include any provision in this regard.

	<ul style="list-style-type: none">• How and when persons should be transmitted to competent authorities;• Rules for incidental detention;• Applicable national and international law;• The requirement and a process for reporting to clients; and• The requirement for humane treatment.		
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