

# 2020 Company Self-Assessment

## Executive Summary

### Progress towards meeting the requirements of the Code

The 2020 Company Self-Assessment (CSA) assessed performance of Member and Affiliate companies (in total 105) towards full compliance with the requirements of the Code. To be in line with the Code, ICoCA Member and Affiliate companies are required to:

1. Incorporate the main principles of the Code into their company policies (Human Rights Commitment).
2. Develop appropriate due diligence measures to adequately identify, prevent and mitigate potential human rights risks and impacts (Human Rights Due Diligence).
3. Continuously monitor and report on human rights risks and impacts and, where such impacts occur, provide effective remedy (Grievance Mechanism and Incident Reporting).
4. Provide adequate initial and recurrent training to personnel to raise awareness of the Code requirements and familiarise them with their human rights and humanitarian law responsibilities (Training).

The CSA responses received demonstrated that, overall, companies have policies and processes in place which cover the main aspects of the Code, such as selection and vetting, use of force, apprehension, anti-corruption, health and safety, grievance procedures and codes of conduct for employees. It is very positive to note that a majority of companies show commitment to improve and to “do it right”. A minority of companies seemed not to be entirely familiar with human rights (e.g. by indicating examples for human rights risks which were not related to human rights), or the Code (e.g. by mentioning the Code in their company Codes of Conduct without reflecting any principles of the Code) or ICoCA Membership (e.g. by indicating they are ICoCA Certified even though they are not).

Based on the analysis of the 2020 CSAs, ICoCA recommends that Member and Affiliate companies continue enforcing the following elements, adapted to their level of progress and membership with ICoCA (Affiliate, Transitional Member, Certified Member):

1. **Further integrate the Code into management systems by:**
  - a. reflecting the Code’s principles in their company values and operations;
  - b. ensuring full understanding of the Code and commitment at the management level;
  - c. having a clear commitment to respect human rights in their Codes of conduct or human rights policies; and
  - d. communicating externally (on company websites) and internally (to employees) about their commitment to respect human rights.

2. **Strengthen company human rights due diligence by:**
  - a. adopting processes/methodologies which help to systematically identify and assess how operations might impact or have impacted the human rights of employees, local communities and other stakeholders;
  - b. clearly analysing in their risk registers the identified human rights risks, their probability and impact severity, the associated mitigation measures and the person or department responsible for their implementation within established timeframes; and
  - c. developing and maintaining a record of effective and continuous engagement with rights-holders, which constitute an essential element of human rights due diligence.
3. **Provide simple and understandable human rights training by:**
  - a. providing human rights training which explains the expected behaviour to employees in practical and understandable format, adapted to the operating context and to the nature of the services provided; and
  - b. ensuring that company management fully understands company human rights responsibilities and the associated Code requirements, how these apply to company operations and that those who are responsible for human rights risk and impact assessments are adequately trained.
4. **Ensure accessibility of company grievance mechanisms by:**
  - a. developing and referencing indicators and other measures to enable effective monitoring of the performance of their company grievance mechanisms; and
  - b. making sure that the mechanisms are accessible to all parties, including local communities or other third parties, through adequate communication and disclosure of information.

## Challenges

The Secretariat noted the following challenges with regard to the 2020 CSA:

- **Languages:** Some company personnel who are not native English speakers can face challenges in fully understanding the questions posed in the CSA and the related Code requirements. Translation into at least French and Spanish would make the CSA more helpful and effective for companies. For the Secretariat, it was sometimes challenging to analyse the CSAs submitted and to provide feedback to companies as policies and other documents provided were in Arabic, Ukrainian, or Chinese, which are languages not currently spoken by Secretariat staff.
- **Overlap between third-party certification and CSA:** Some companies found parts of the CSA to be duplicative of ISO 18788 certification requirements and did not seem to understand the difference between ensuring an effective quality management and integrating the Code's principles into the company's culture.
- **Limited understanding of the Code and ICoCA Membership:** Some companies did not seem to fully understand the content of the Code and the differences with other international frameworks such as the Voluntary Principles on Security and Human Rights or the Montreux Document. Also, there still seems to be significant confusion about the difference between signatory status and ICoCA Membership as well as between the Code and the Association itself. Some companies communicate their signatory status through their websites but do not mention their membership with ICoCA.
- **Limited understanding and relevance of certification:** A number of companies indicated in their CSA that they do not see any particular advantage in becoming third-party or ICoCA Certified (mostly

because of lack of client recognition), and that industry certification standards, as currently structured, do not reflect their operational realities (especially for those companies that do not provide traditional security services such as kidnapping negotiations or risk management advice).

- **Differing understanding or lack of understanding of Code requirements:** The 2020 CSA includes for every section a short description of the Code requirements in order to provide companies with an explanation of what is expected from them. Based on some of the answers generated by companies, there remains a range of understanding and expectations regarding the specific requirement of Code principles. The 2020 CSA underlines the need for ICoCA to provide regular and detailed training on the different Code requirements, the Code as a whole and how it should be incorporated into a company's culture. This was also confirmed by the feedback received from some companies that indicated that they wished to learn more about topics such as Human Rights Risk and Impact Assessments, PSEA, modern slavery, grievance mechanisms and other topics. One company also suggested to open the CSA up for companies to fill it in throughout the year guided by ICoCA training sessions. The development of a dedicated training platform for ICoCA Member and Affiliates might prove useful to this purpose.
- **Personnel turnover:** In few cases, company personnel seemed to be newly hired as ICoCA focal points and as such were not necessarily fully briefed as to the purpose of the CSA and the Code's requirements. In one case, the quality of the CSA was worse this year than last year (assumingly because the ICoCA focal point had changed in the company).
- **Length of the CSA:** A majority of companies welcomed the new format of the CSA and found it more helpful than the 2019 CSA, though approximately 39% of companies felt the length could be shorted.

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## Company Progress

### Human Rights Commitment

ICoCA Member and Affiliate companies are expected to communicate their commitment to respect human rights to the public and their personnel. This commitment should be reflected in a Code of Ethics, Code of Conduct, Employee Handbook or a Human Rights Policy.

97% of all companies that submitted their CSA indicated to have a declared commitment to respect human rights in their policies and on their websites, and 89% also reported that they mention the International Code of Conduct. When verifying this requirement, the Secretariat noted that the International Code of Conduct was often mentioned as one of the frameworks the company adhered to. However, in many cases companies had yet to take the additional step of systematically integrating the Code's principles into their internal policies. There was also a certain confusion regarding the following elements:

- **The Voluntary Principles on Security and Human Rights<sup>1</sup>:** In most cases, companies (including companies providing maritime services) stated that they adhere to the Voluntary Principles, often mentioning these and the Universal Declaration of Human Rights as the only frameworks guiding their human rights commitment. This seems to be partially due to the fact that clients require companies to refer to the Voluntary Principles in their internal policies without being aware of the Code or ICoCA. However, based on answers received from companies, there seems to be a lack of understanding regarding the exact nature and purpose of the Voluntary Principles and to whom these are addressed.
- **Montreux Document<sup>2</sup>:** Less than the Voluntary Principles but still surprisingly often, companies state that they adhere to the Montreux Document, a set of good practices addressing States, or confused the Montreux Document with the Code.
- **Signatory status:** In many cases, companies referred in their codes of conduct to their signatory status of the International Code of Conduct, without mentioning their Membership with ICoCA. There seems to be a lack of understanding regarding the fact that the signatory status is no longer recognised by the Association and that it was replaced by membership in ICoCA following its establishment in 2013.

Encouragingly, 94% of all responses indicated that company codes of conduct are also applicable to subcontractors and other business partners. Assumingly, this also includes those companies that do not use subcontractors as the question did not offer a “not applicable” option. It is interesting to note, though, that a smaller number (88%) also explains the company's expectations regarding the conduct of their subcontractors (see Figure 1).

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<sup>1</sup> The Voluntary Principles on Security and Human Rights available here: <http://www.voluntaryprinciples.org/wp-content/uploads/2019/12/TheVoluntaryPrinciples.pdf>

<sup>2</sup> The Montreux Document on pertinent international legal obligations and good practices for States related to operations of private military and security companies during armed conflict available here: [https://www.eda.admin.ch/dam/eda/en/documents/aussenpolitik/voelkerrecht/20192511-montreux-document\\_EN.pdf](https://www.eda.admin.ch/dam/eda/en/documents/aussenpolitik/voelkerrecht/20192511-montreux-document_EN.pdf)

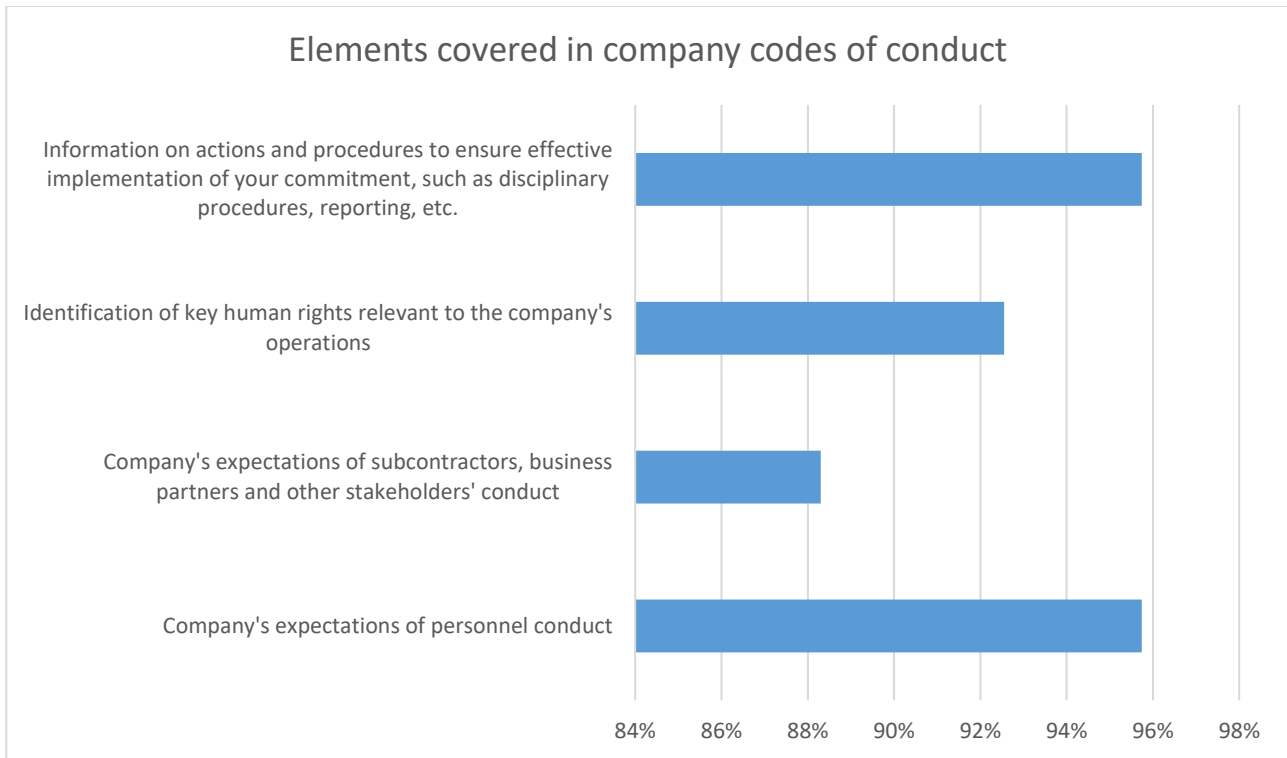


Figure 1: Elements covered in company codes of conduct

Figure 2 shows a summary of the human rights companies reported to take into consideration in their codes of conduct or human rights policies. To note that those selecting “none of the above” (3%) did not seem to consider the question appropriately and ticked all the options.

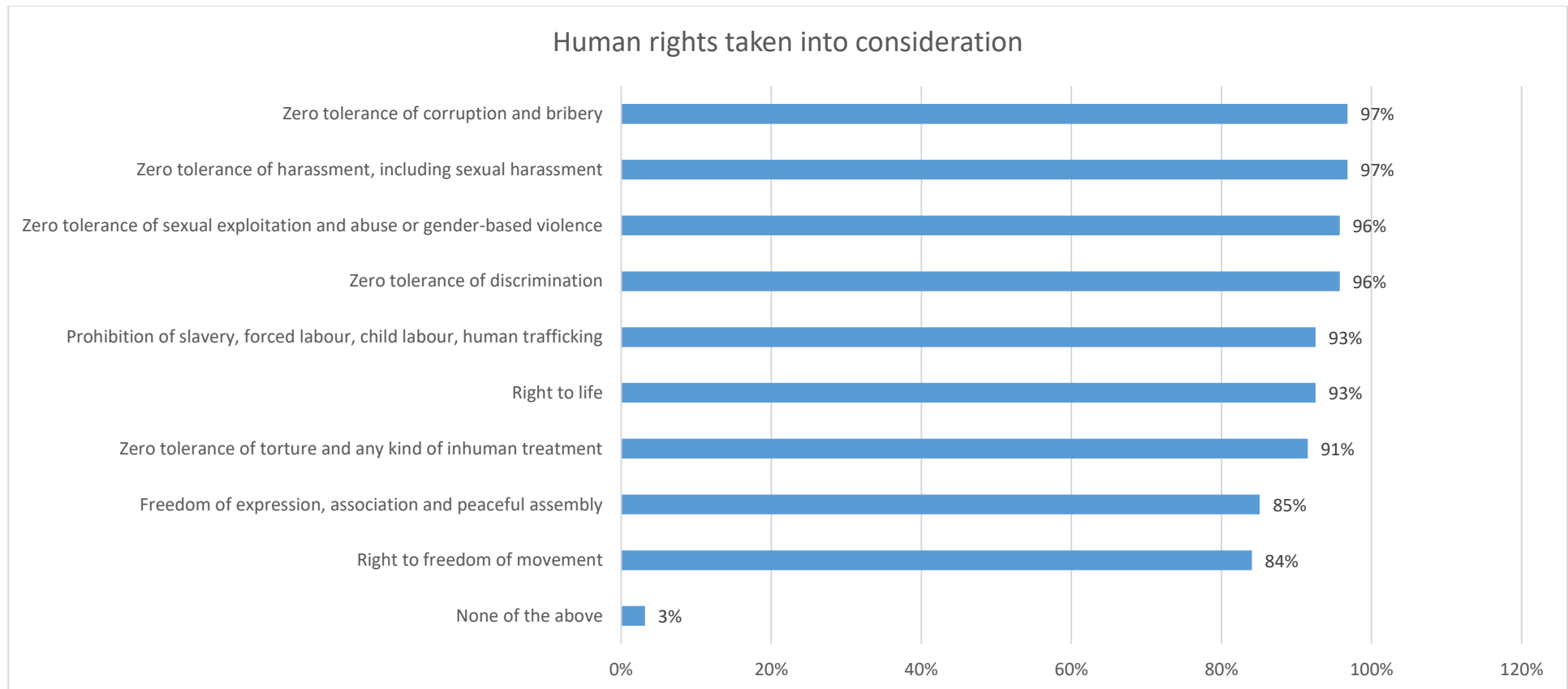


Figure 2: Human rights taken into consideration in company codes of conduct

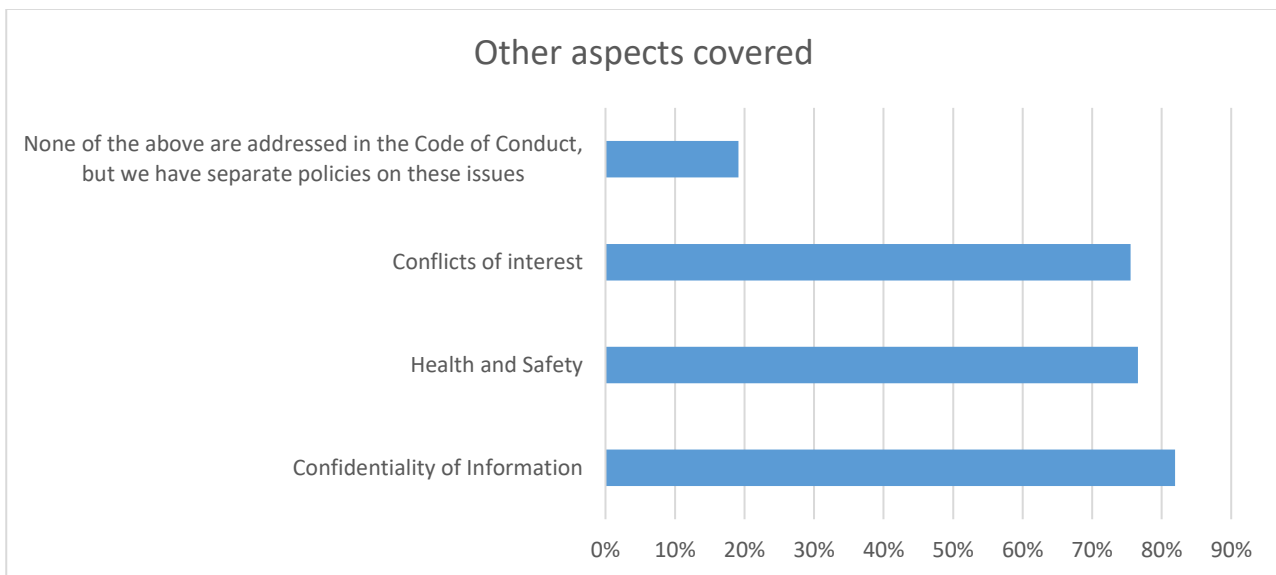


Figure 3: Other aspects covered in company codes of conduct

54% of companies that submitted the CSA (see Figure 4) indicated that they do not make their human rights commitment or codes of conduct publicly available. Upon verification of this requirement, a range of practices were noted. Many companies just mention the Universal Declaration of Human Rights or signatory status or the Code itself on their website without providing further information. Only a few publicly describe their commitment and offer the possibility to download their human rights policy or code of conduct from the website.

To note that Membership with ICoCA is not marketed and often companies do not refer to ICoCA and their membership on their website, e.g. do not display the ICoCA logo or their membership status (Affiliate, Member, Certified Member logo).

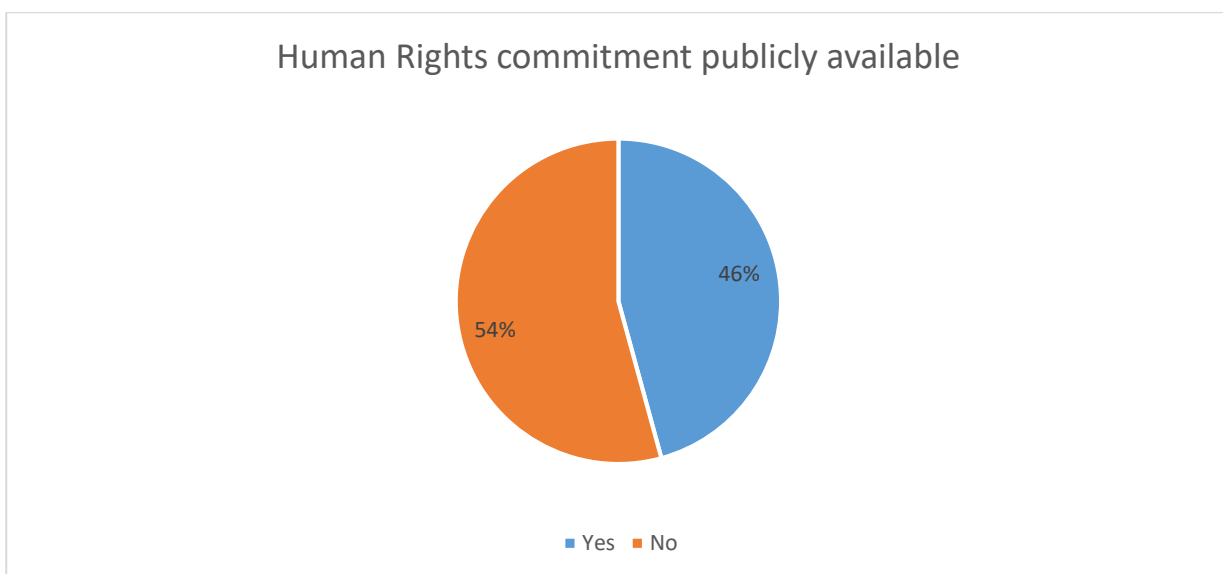


Figure 4: Publication of company human rights commitment.



## Human Rights Risk and Impact Assessment

To uphold their commitment to respect the Code principles, ICoCA Member and Affiliate companies are expected to have processes in place which document where companies see their operations potentially impacting the human rights of others (personnel and public), how likely they see these impacts taking place and what could be their severity, how companies plan to avoid such impacts (including risk owner and implementation timeframe), and how regularly they update their assessment.

Companies reported the following to the question of what they have in place in terms of human rights risk and impact assessment:

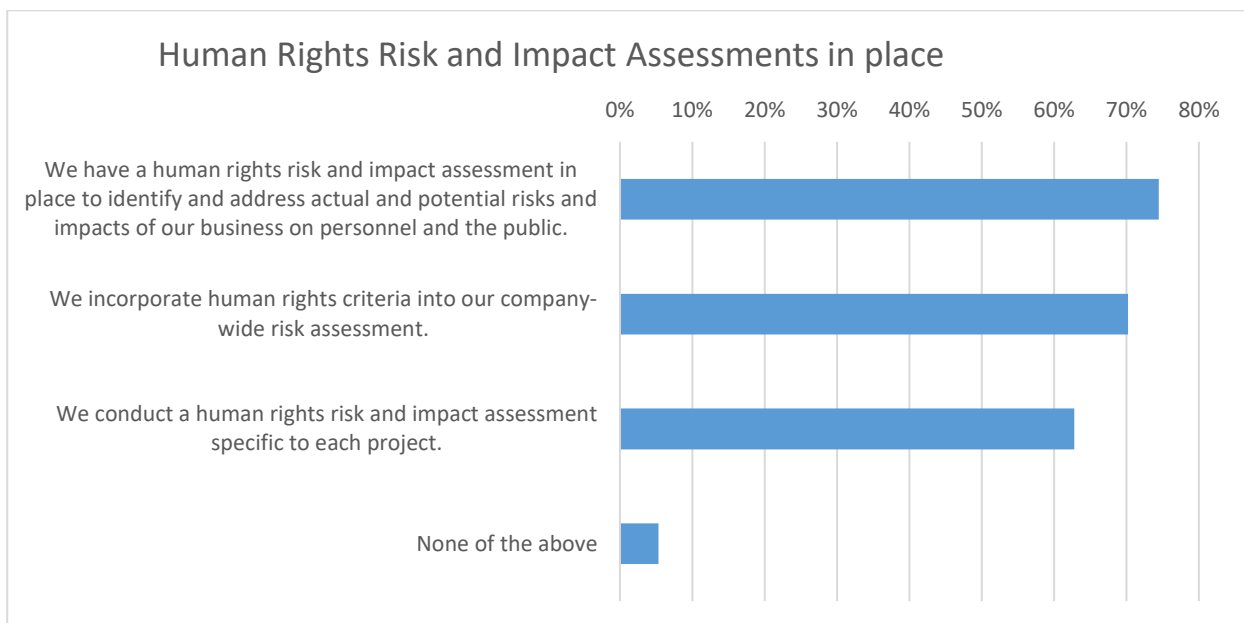


Figure 5: Human Rights Risk and Impact Assessments in place

With regard to the elements on which company human rights risk and impact assessments are built (see Figure 6), it seems that companies are strongest in their prevention and mitigation measures (79%). Defining staff responsibilities was lower, at 59%. The answers in Figure 6 should be taken with some caution as more work is required by companies to clearly define/understand specific human rights risks. This became clear upon verification of the human rights risk examples provided or, in some cases, during the Secretariat review of the ICoCA Certification applications submitted.

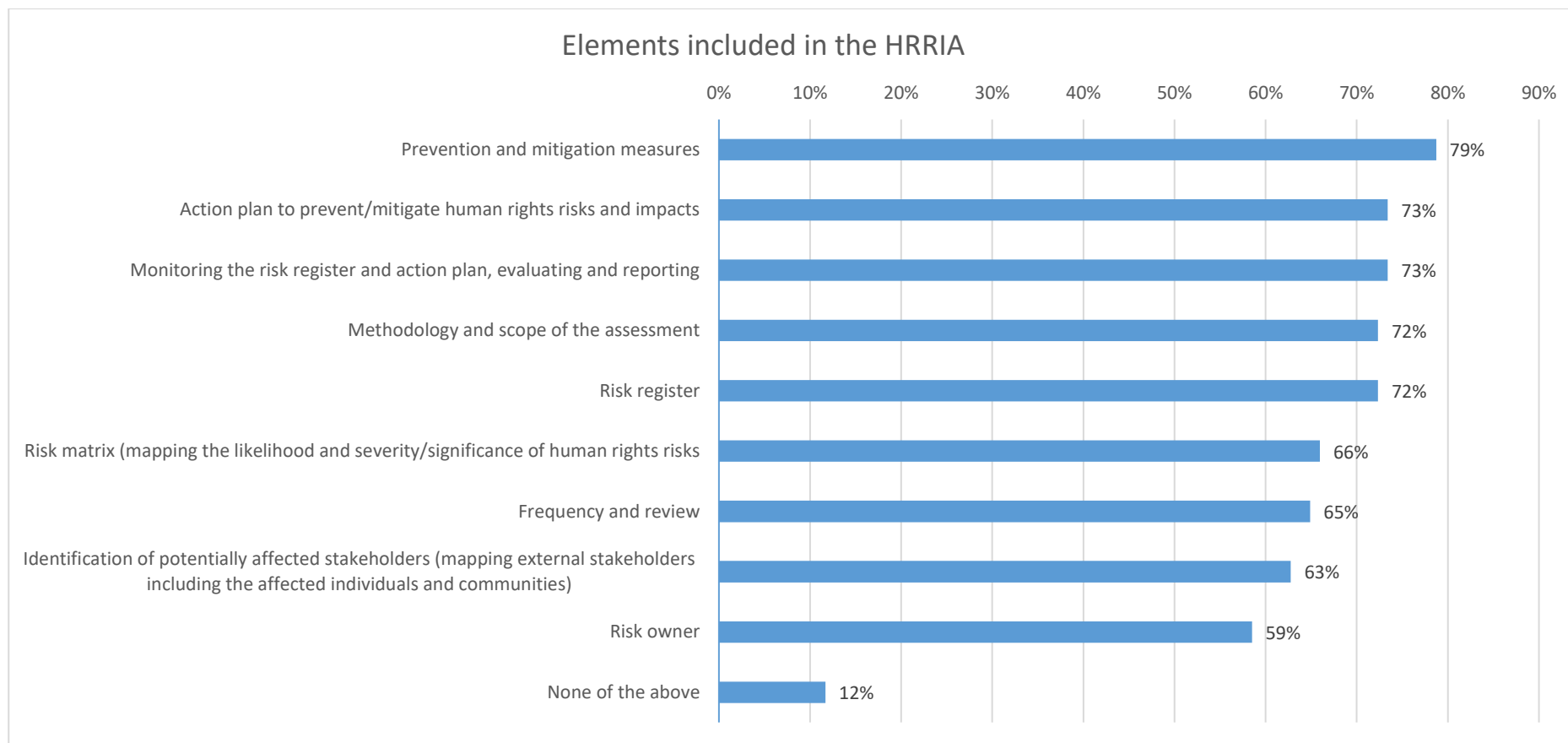


Figure 6: Elements included in company Human Rights Risk and Impact Assessments

When asked to provide three examples of the most relevant human rights risks identified in their latest assessment, few companies provided specific human rights risks. Instead, companies cited other risks and mitigation measures:

- **General risks to the company:** For example, the COVID-19 pandemic, teams not being able to return home, remote vehicles breakdowns, guard fatigue, national security deterioration, generic reference to violation of human rights without specifying the connection with company activities or business relationships;
- **Mitigation measures:** For example, Rules for the Use of Force, fair hiring processes;
- **Other:** For example, not respecting lunch hours, travel documents not provided in a timely manner, impact on canines, personal injury, kidnap.

When identifying potentially affected stakeholders by company operations as part of their human rights due diligence process, 45% of companies indicated that this would include employees, subcontractors and clients. The public or local communities often seemed not to be taken into adequate consideration.

Few companies identified engagement with stakeholders (and rights-holders in particular) as part of their human rights impact assessment and provided concrete examples. Systematic engagement between companies and stakeholders, which is an essential element of human rights impact assessments and due diligence, is an area needing improvement.

## Impact areas

### Selection and vetting of personnel and subcontractors

The Code requires Member and Affiliate companies to exercise due diligence in the recruitment and ongoing performance review of personnel. Articles 45 to 54 of the Code underscore the company's responsibilities in selecting and vetting personnel and subcontractors.

At a minimum, Members and Affiliates are required to verify the following information in the selection of personnel:

- The candidate's identity.
- The age of the candidate to ensure that the company is not hiring an individual below the age of 18.
- The candidate's education history.
- References and the employment history of the candidate.
- That the candidate has no criminal history indicating that (s)he is not able to perform security services pursuant to the Code's principles.
- That the candidate has no history of human rights abuse.
- That the candidate has sufficient physical and mental fitness to perform the assigned duties.

90% of companies reported that they have a selection and vetting procedure in place which would in 64% of the cases also be applicable to subcontractors. 15% responded that their selection and vetting process is not applicable to subcontractors, and 14% do not use subcontractors.

A majority of companies reported recruiting their personnel directly, while 19% indicated that they use recruitment agencies.

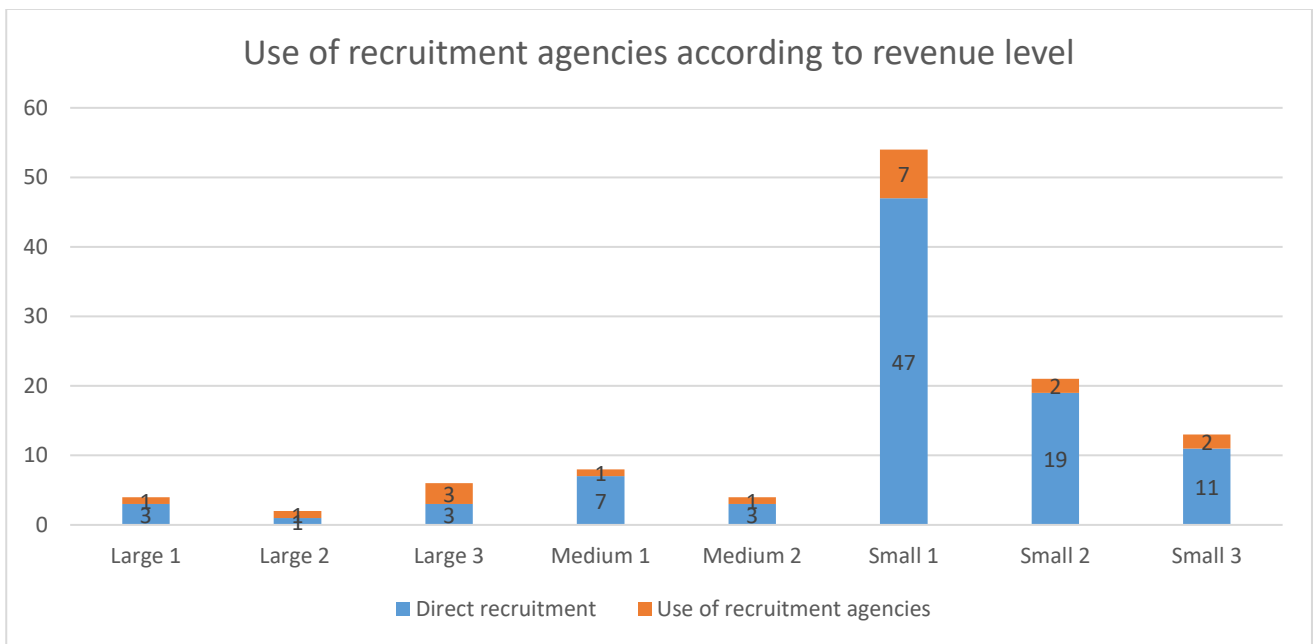


Figure 7: Use of recruitment agencies according to revenue level

It is interesting to note that recruitment agencies are not necessarily only used by larger companies. 10% to 20% of small companies indicated that they use recruitment agencies and not all medium to large companies seem to recruit staff through them.

89% of those companies that reported to use recruitment agencies indicated a variety of approaches to ensure to prevent any risk of human trafficking. A majority indicated that they sign agreements with recruitment agencies and conduct interviews with personnel. Some companies also check that these agencies are licensed and audit them from time to time. Other companies pay salaries directly to employees instead of channelling them through recruitment agencies, or rely on the monitoring and enforcement of government agencies. In case preventive measures prove not to be effective, some companies indicated that personnel can raise issues via the company grievance mechanism.

### Personnel performance review

The Code requires companies to regularly evaluate their personnel in order to ensure that they are mentally and physically capable to carry out their assigned duties. Companies indicated that their employees' performance review processes cover the following elements:

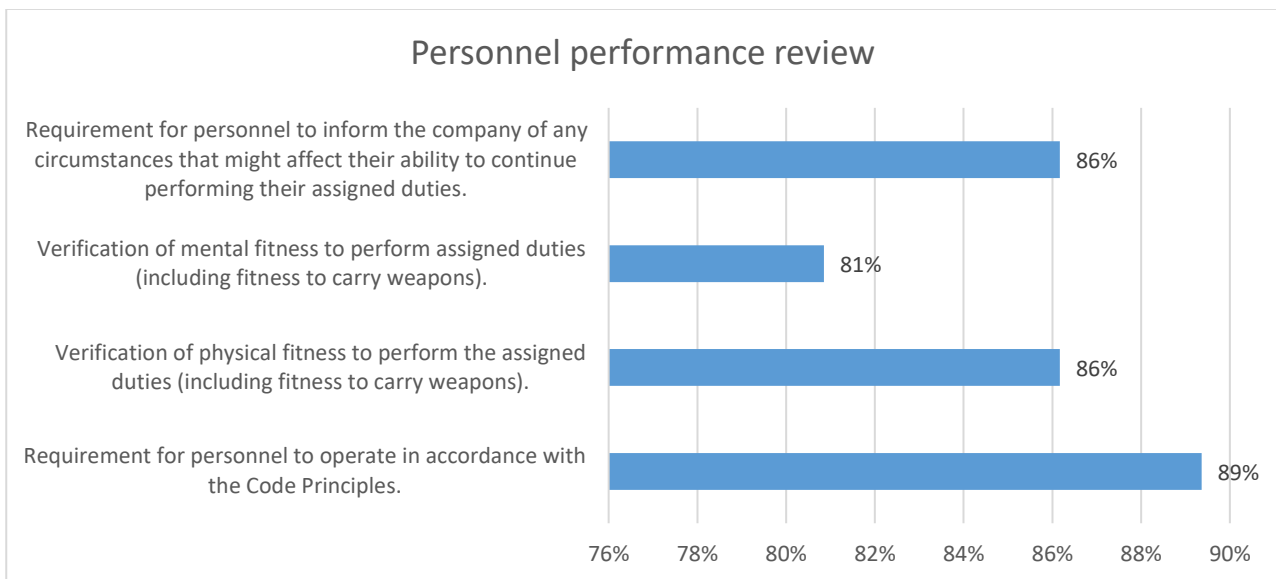


Figure 8: Personnel performance review

From the responses received (see Figure 8), it seems that companies are more meticulous in reviewing physical fitness of their personnel than their mental fitness.

In terms of frequency, a majority of the companies are reviewing the performance of their personnel on an annual basis (49%). This is a general indication and should be taken with caution. In many cases, the frequency of performance reviews depends on client requirements, the commencement of new projects, or the specific criterion being assessed (physical fitness, mental health, human rights, use of force, etc.). Weapons training is usually carried out more often than general performance reviews.

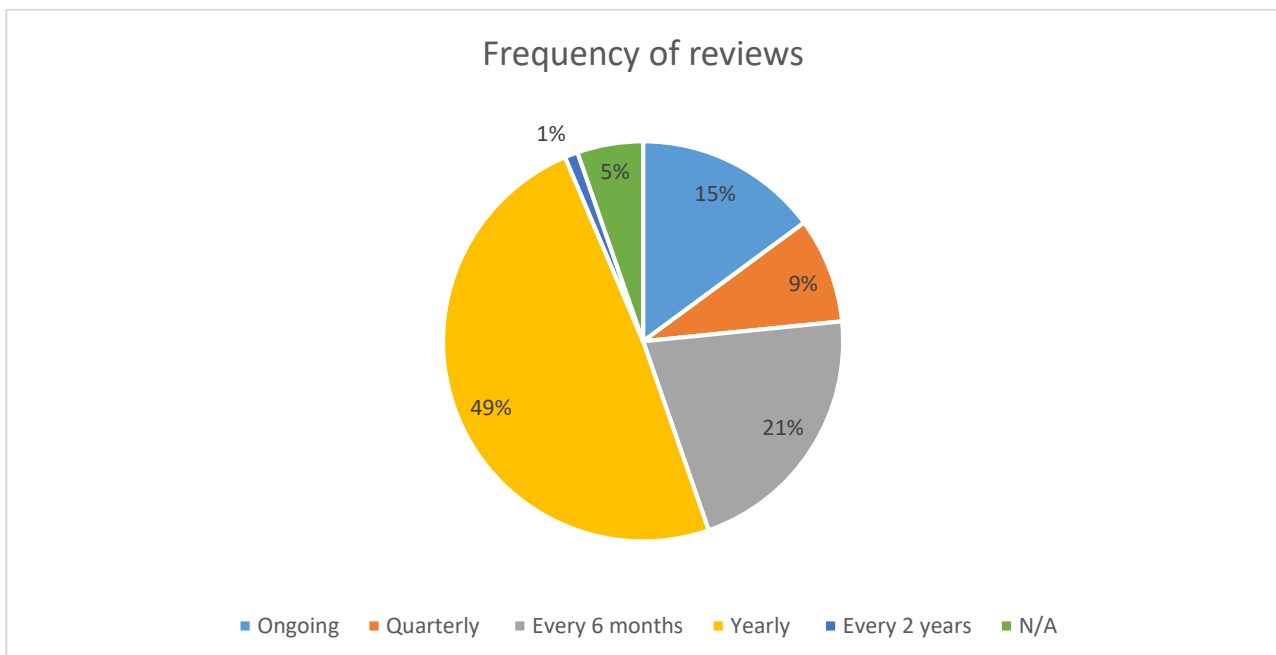


Figure 9: Frequency of performance reviews

## Modern slavery

Member and Affiliate companies must not engage in human trafficking, slavery, forced labour, child labour and abuse. Articles 39, 40 and 41 of the Code require them and their personnel to remain vigilant to all such instances, and where discovered, report them to competent authorities.

61% of the companies that submitted the CSA reported that they embed modern slavery considerations into already existing policies, while 28% have stand-alone policies in place.

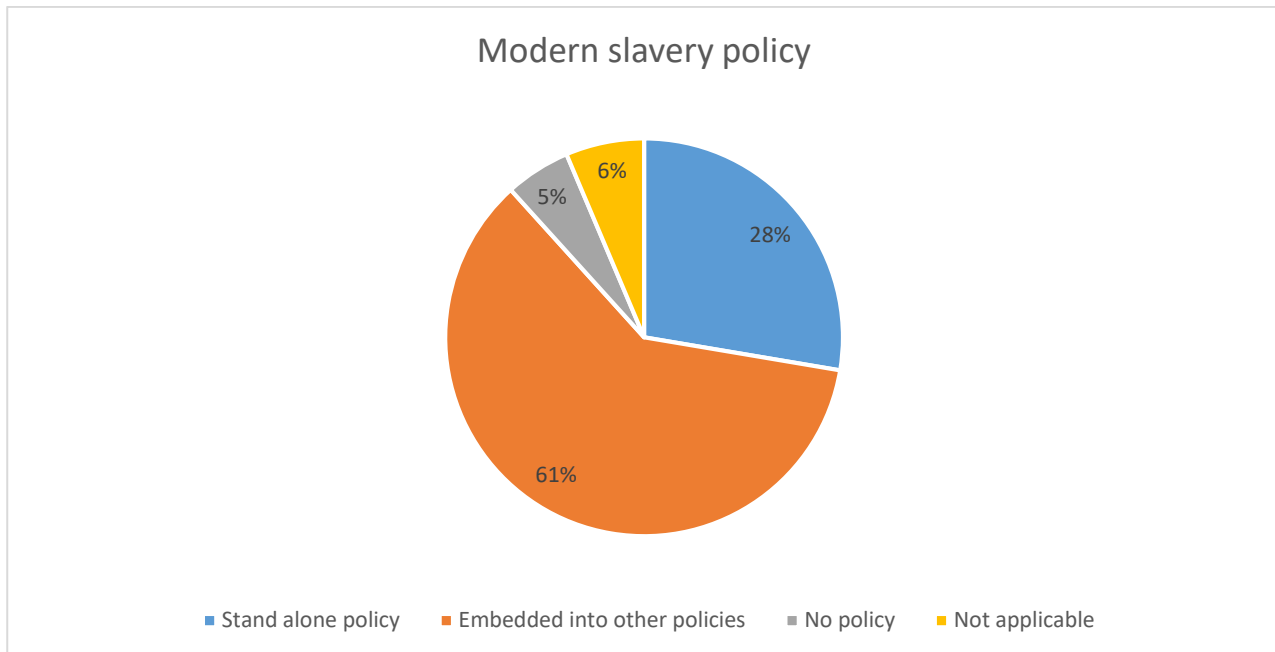


Figure 10: Modern slavery policy

Over 80% of respondents indicated that they identify risks of human trafficking, forced labour and child labour in their human rights risk and impact assessments. However, upon verification of this requirement, some companies indicated that they do not systematically identify and evaluate these risks. Some comments received from companies (see after Figure 11) underline this view.

From some of these responses it seems that companies are not fully familiar with what human trafficking, forced labour or child labour mean in practice, nor do they seem to evaluate the probability of these risks (with few exceptions). There seems to be a general assumption among companies that they do not seem to be concerned by these issues, without having fully evaluated the risks. As part of the feedback provided, the Secretariat pointed out that companies might risk being indirectly involved in human trafficking (e.g. by contracting a cleaning company employing underage personnel or other examples) and that it is advisable to look into this more thoroughly.



*Figure 11: Identification of modern slavery risks in company Human rights risk and impact assessments specifically for their recruitment processes or in the provision of the services offered*

The following comments received from some companies offer an insight into how some companies approach modern slavery:

- “This is akin to having a policy not to commit murder. Do not mis-read our comments as dismissive. These tenets are in the myriad of policies we have adopted. Furthermore, these activities are illegal and as such we are legally compliant at all times in the performance of our services. If identified we escalate to the lawful authorities.”
- “Although we don’t have a specific written policy, any staff member would obviously report any suspicion of such activity.”
- “Our employees are security guards, former military personnel who are free to leave their positions at any time, we pay for their flights to and from their home countries. They are not children, have full freedom of movement between assignments, and are aware that they can cease work at any time, under our HSE arrangements. We have full whistleblower arrangements.”
- “It should not be necessary, since it is law.”

Two companies reported that they have ongoing investigations related to debt bondage, otherwise none of the respondents indicated that they have received any substantiated complaints nor recorded any incidents related to modern slavery.

### **Use of Force**

The Code requires Member and Affiliate companies to take all reasonable steps to avoid the use of force. Articles 29 to 32 of the Code require:

- That the Company adopts written Rules for the Use of Force;

- That the use of force is restricted to only when strictly necessary, and that it is proportionate to the threat and appropriate to the situation.
- That personnel do not use firearms against persons except in self-defence or defence of others against the imminent threat of death or serious injury, or to prevent the perpetration of a particularly serious crime involving grave threat to life.

83% of ICoCA’s Member and Affiliate companies indicated that they offer services which may require the use of force. The other 17% provide unarmed services such as training or security risk assessments and evaluations, or are prohibited from being armed by host state regulations. Nearly all companies have Rules for the Use of Force in place, with one exception of a company that is required to use the national navy for all services which may involve the use of force.

Companies reported that they include the following Code principles into their Rules for the Use of Force.

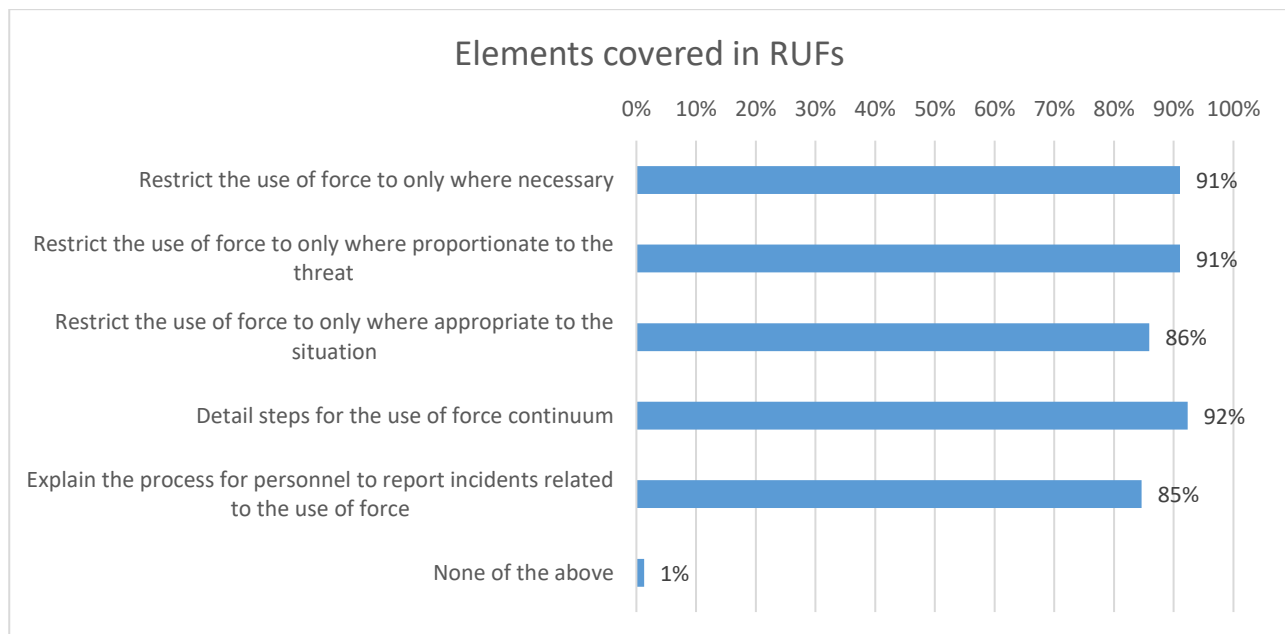


Figure 12: Elements covered in company Rules for the Use of Force

Most of the companies also indicated that the use of firearms is restricted to the circumstances described in the Code (Figure 13). Those that reported that this would not be applicable to them explained that for armed services, they have to resort to the national navy or that they are unarmed/not licensed to carry firearms.



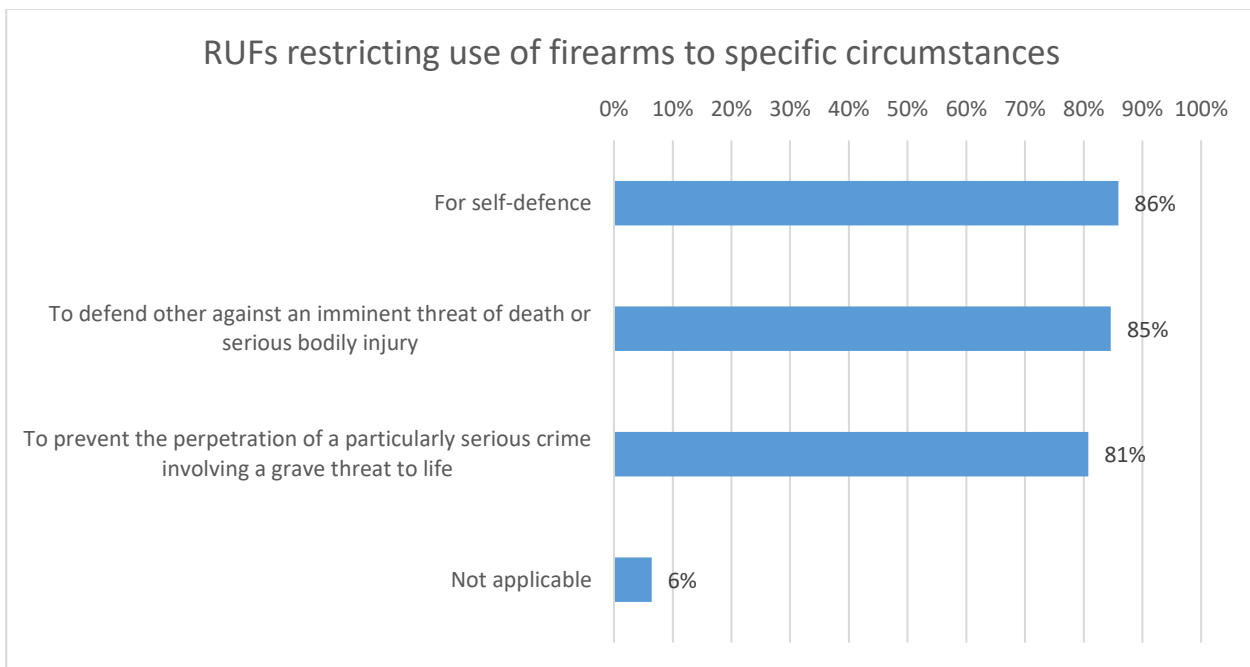


Figure 13: Company RUF restrict use of firearms to the following circumstances

### Apprehending persons

The Code requires Member and Affiliate companies to have procedures in place that restrict apprehension of persons and outline the requirements for personnel. Article 34 of the Code requires that apprehending persons is limited to cases where the company personnel need "to defend themselves or others against an imminent threat of violence, or following an attack or crime committed by such persons against Company Personnel, or against clients or property under their protection, pending the handover of such detained persons to the Competent Authority at the earliest opportunity."

63% of ICoCA's Member and Affiliate companies indicated that they offer services which may require the apprehension of persons. 18 (31%) reported that there have been cases of apprehension during the past reporting year. When asked if for each apprehended person they considered the Code principles, companies provided an inconsistent picture. Companies answered that they both apprehend persons upon imminent threat of violence against company personnel or others (12) and due to an attack or crime against company personnel, client or property under their protection (21).

Similar results can be observed when asked how companies treated apprehended persons (see Figure 14).

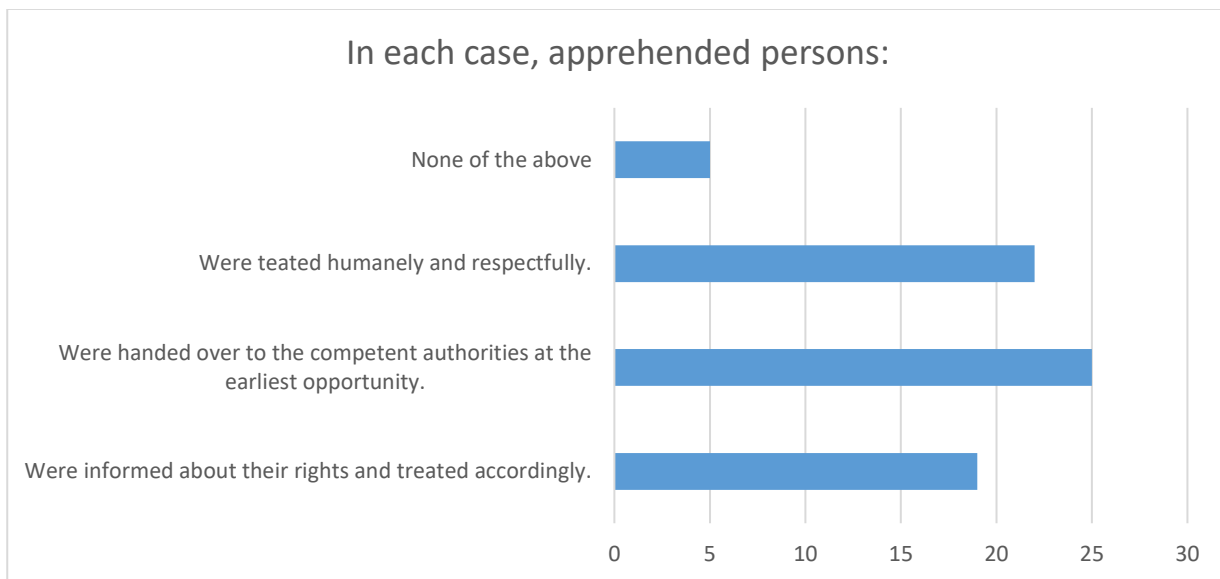


Figure 14: Handling of apprehended persons in line with the Code.

None of the companies indicated that they have received complaints related to the apprehension of persons.

### **Prevention of Sexual Exploitation and Abuse (PSEA) and Gender-Based Violence (GBV)**

To prevent and address SEA and GBV, Member and Affiliate companies are expected to define requirements and processes outlining employees' responsibilities. In particular, Member and Affiliate companies must:

- Not benefit from SEA or GBV;
- Not allow their personnel to engage in or benefit from SEA or GBV;
- Require their personnel to remain vigilant for all instances of sexual or gender-based violence;
- Report instances of sexual or gender-based violence to competent authorities.

85% of companies reported that they have a stand-alone PSEA policy in place or that they had embedded the Code principles into an already existing company policy (see Figure 15).

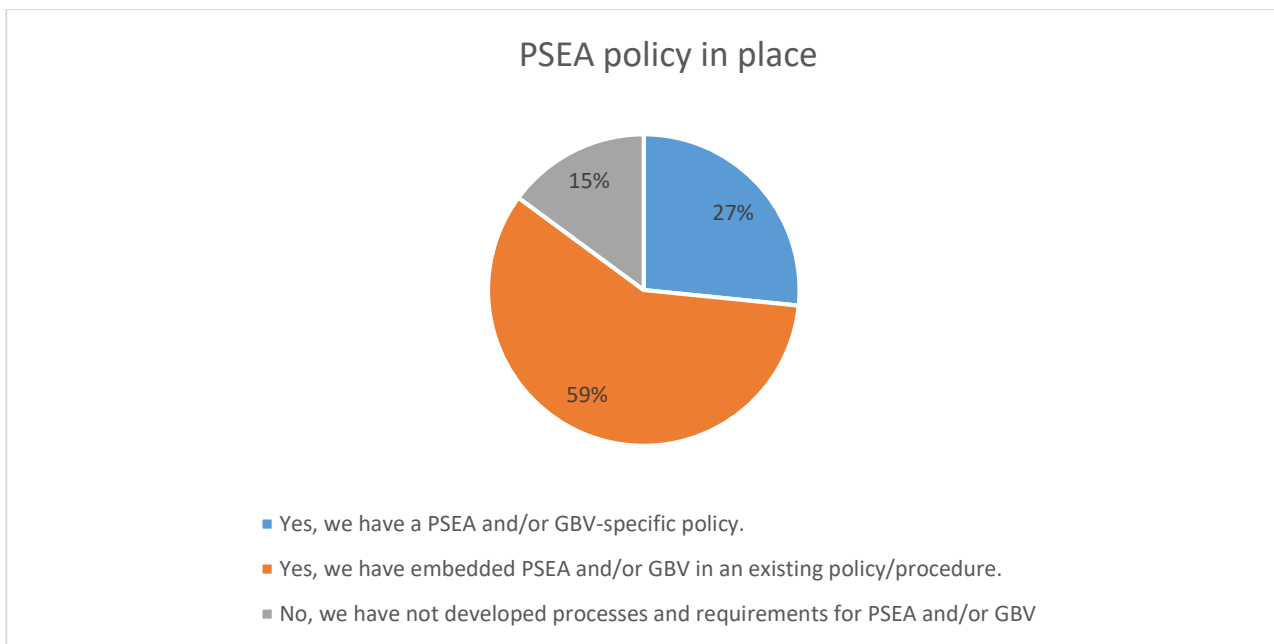


Figure 15: PSEA policy in place

76% of companies responded that they take a survivor-centred approach in dealing with SEA and GBV complaints and in the potential provision of assistance to survivors. The Secretariat followed up in many cases to ask companies for any good practices that they might be able to share. Some companies explained that they have trauma risk management trained staff available, or that they are ready to provide any necessary medical and psychological support, access to the legal team as well as any other complete transparent assistance to ensure timely reporting to competent authorities. Other companies indicated that they are working on strengthening their processes and support to survivors. In the majority of responses, any focus on third parties, i.e. community members, was absent. One company explained during a follow-up call that it would be difficult for them to support third parties in such cases due to the cultural challenges and complex environments where they operate.

Two companies reported that they have received complaints related to sexual harassment.

## Health and Safety

Member and Affiliate companies are expected to ensure the health and safety of their employees, contractors and local communities by identifying and addressing health and safety risks both at the workplace and in their operations. Article 64 of the Code particularly asks Member Companies to:

- Assess risks of injury to personnel as well as the risks to the local population generated by the activities of the company and/or personnel;
- Provide hostile environment training;
- Provide adequate protective equipment, appropriate weapons and ammunition, and medical support;
- Adopt policies which support a safe and healthy working environment within the company, such as policies which address psychological health, deter workplace violence, misconduct, alcohol and drug abuse, sexual harassment and other improper behaviour.

83% of companies reported that they have a health and safety management system in place. Figure 16 illustrates which aspects companies reported that they would include in their health and management systems. It seems to be common for companies to identify health and safety risks (95%) while a lower number of companies seem to measure the performance of their systems (82%).

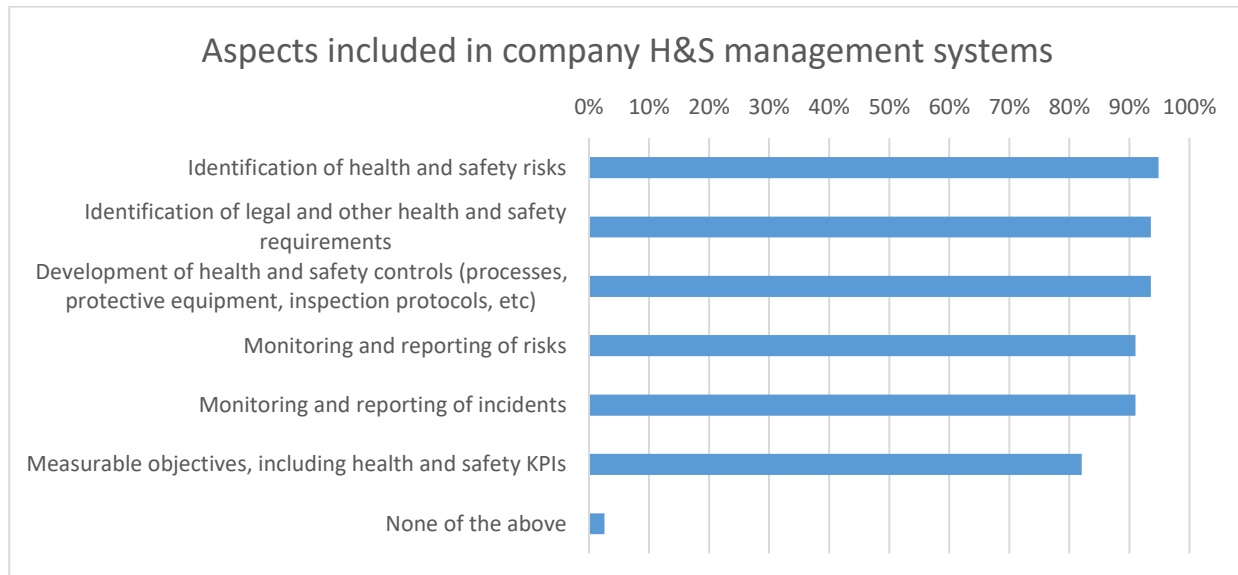


Figure 16: Aspects included in company Health and Safety Management systems

Most of the 83% of companies that indicated to have a health and safety management system in place verify it through internal audit. Only a few (17%) do not verify or audit their systems.

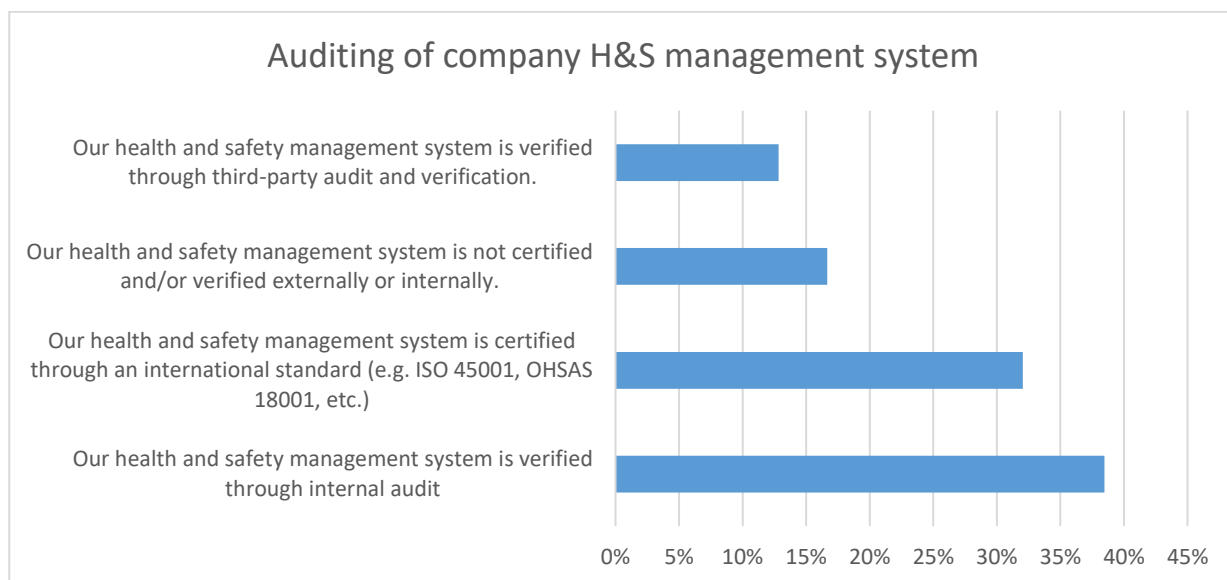


Figure 17: Auditing of company Health and Safety Management system

Those companies that indicated that they measure the performance of their health and safety management system with key performance indicators (KPIs) showed a diverse range of approaches and methodologies. A few use the KPIs determined by their clients which would differ from project to project. Others indicated that

they aim to become certified to an international health and safety management standard in the future. Some do reports on health and safety and share them with the company management on a weekly or monthly basis, and others share it with their board of directors on a quarterly basis.

The use of KPIs seems to be particularly prevalent in the oil and gas industry as well as with some governments. Those companies that do not work for such clients seemed to be less familiar with KPIs. In total, 31 companies reported that they use KPIs to measure the performance of their health and safety management system.

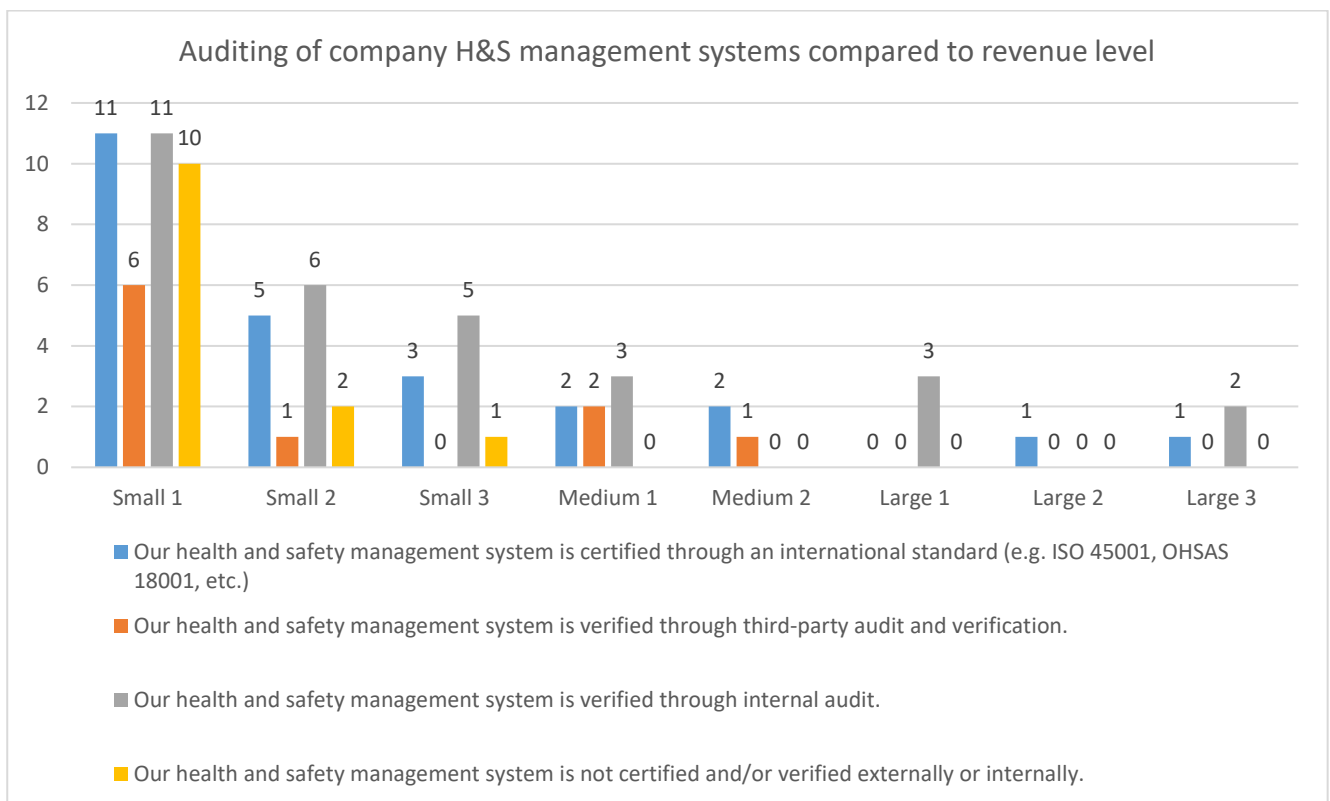


Figure 18: Auditing of company Health and Safety management systems compared to revenue level

## Grievance Mechanism and Incident Reporting

Member and Affiliate companies are expected to establish a grievance mechanism which at a minimum is able to address complaints alleging that the company did not respect the Code's principles. These mechanisms need to be fair, accessible to both company personnel and the public and offer effective remedies.

81% of companies responded that they have their grievance mechanism or grievance procedure displayed on their website. Those that have not published it indicated that their websites are currently being updated, that the contact form may be used or that the mechanism would be run by the parent company. Some also explained that they have an open-door policy and as such would not need to display any information on the website. Others indicated that it would form part of personnel induction processes or that information about the mechanism is displayed in public areas of the company's offices. Some companies consider only clients as third parties and indicated that they run client surveys to make sure that they are aware of potential complaints.

When looking at the main elements which should be covered in a company grievance procedure according to the Code (see Figure 19), most companies describe how complaints can be submitted to the company (95%). A lower number of companies seem to include a process to ensure independent oversight (74%) and an appeal process (71%) in case a complainant is not satisfied with the resolution offered. When following up regarding the independent oversight, some companies explained that they were unsure about what exactly this meant, i.e. an external ethics committee or ensuring that investigations are independent.

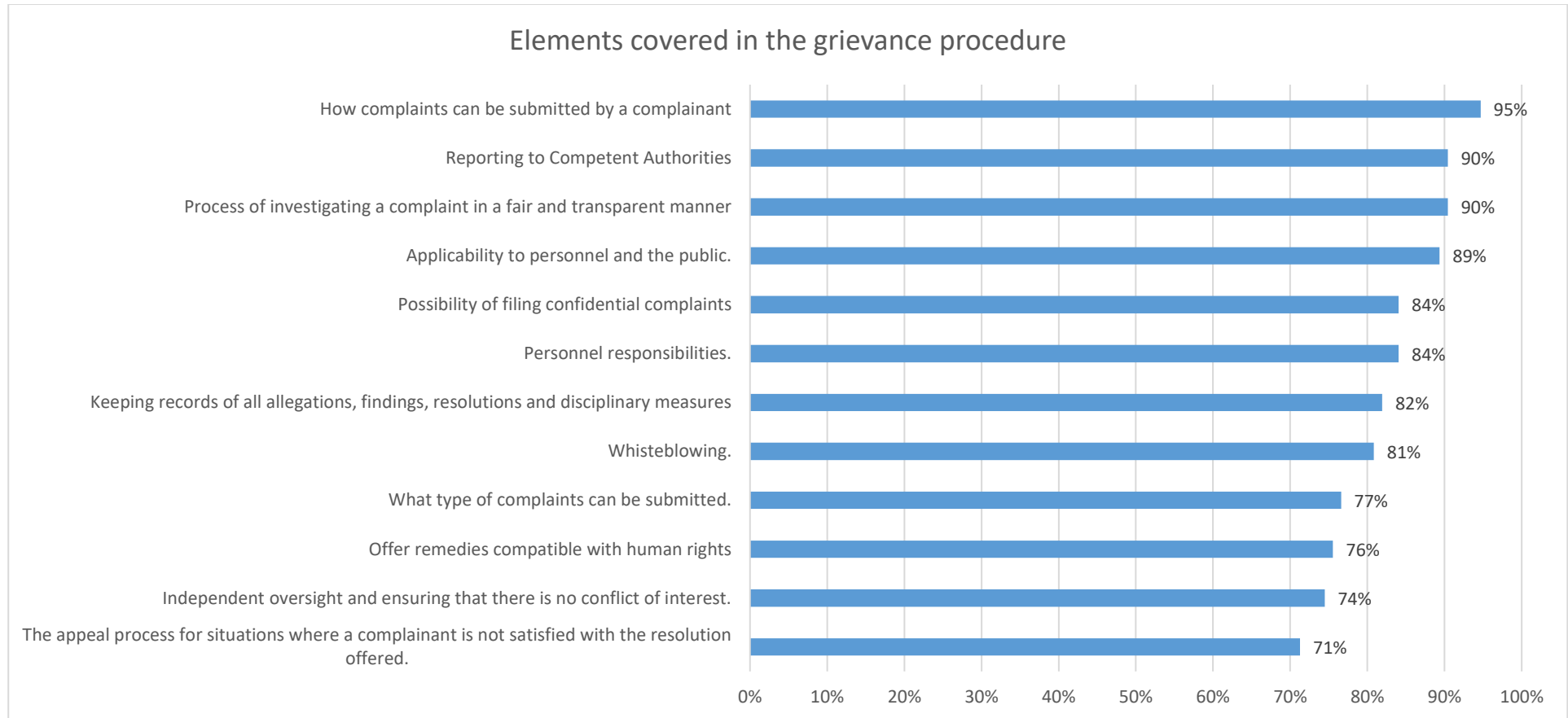


Figure 19: Elements covered in company grievance procedures

76% of the companies indicated that their grievance procedure also applies to subcontractors (see Figure 20).

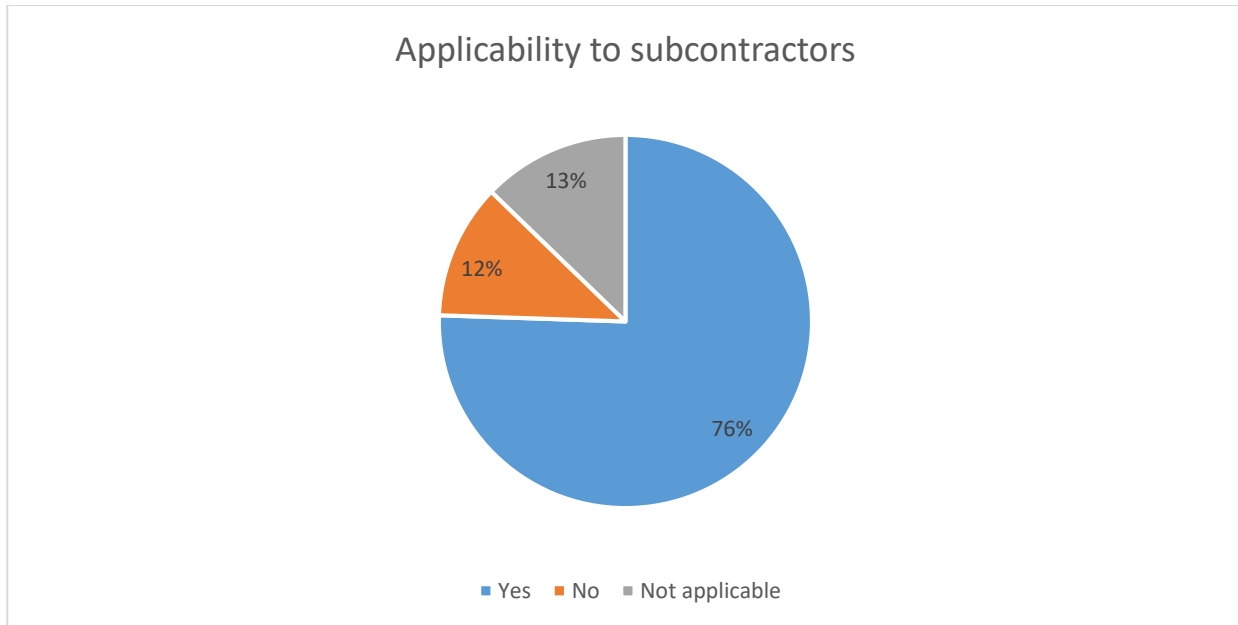


Figure 20: Applicability of grievance procedure to subcontractors

The majority of those 13% which responded “not applicable” indicated that they were not using subcontractors. Some explained that they were currently reviewing the subcontracting processes or that at this stage the grievance procedure is not applicable to their subcontractors.

In terms of complaints received, 11% of the companies that submitted the CSA reported that they received complaints in the past year. All of them received complaints submitted by personnel. Only 20% of the companies that indicated that they received complaints stated that they also received complaints from third parties. The complaints received covered issues such as nepotism and favouritism, with managers not necessarily following the company recruitment policy for promotions or a group leader offering a female guard favourable working conditions (e.g. stopping shift early) and other guards having to cover for that, (sexual) harassment, human resources/contracts, traffic accidents, senior management members failing to comply with company standards, allegations of bonded labour in relation to third-country nationals employed by subcontractor, discrimination, conflicts of interest or allegations of unfair treatment.

Most of these complaints were received via e-mail or through the company website (see Figure 21).



### Channels used to submit a complaint

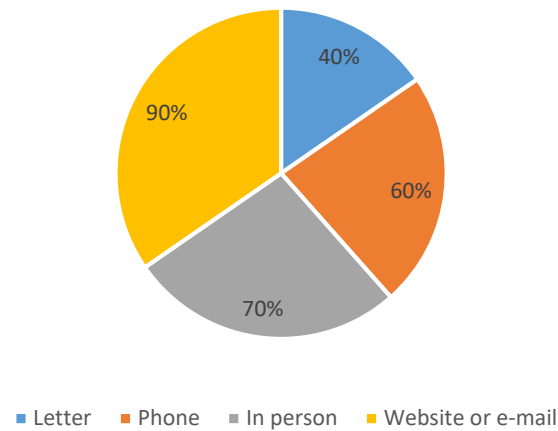


Figure 21: Channels used to submit a complaint to a company

43% indicated that they monitor the performance of their grievance mechanism, but only communicate the results internally. 35% reported that they also communicate the results externally. When following up with these companies, not all fully understood what was meant by “external” reporting.

This area seems to be an area where companies would need further guidance.

### Monitoring of the company grievance mechanism performance

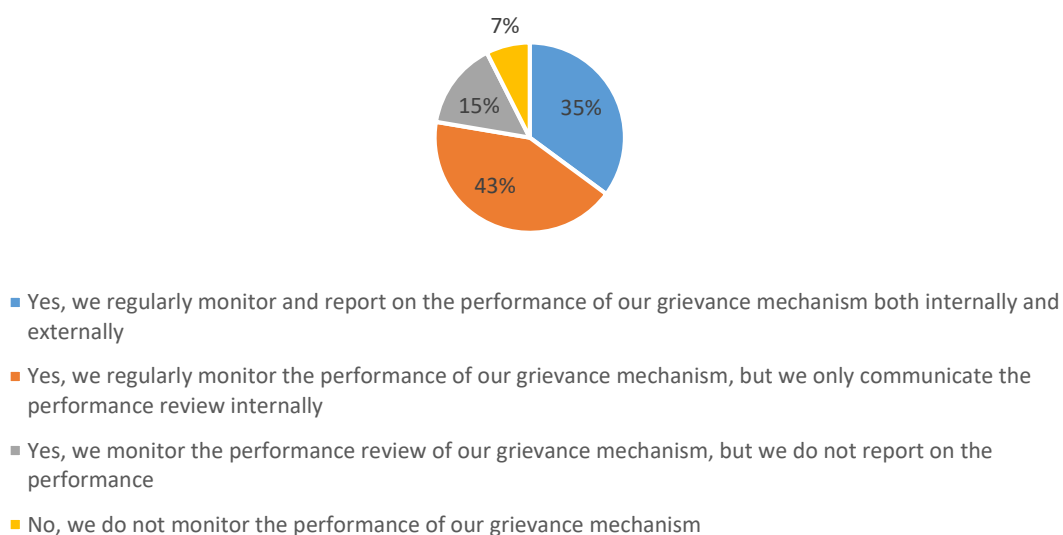


Figure 22: Monitoring of the company grievance mechanism performance

When looking at incident reporting, companies seem to be very familiar with incident reporting processes. 93% reported that they have a process in place. A few of those indicating that they do not have a process in

place explained that they are currently developing one as part of their preparation to obtain certification to one of the ICoCA’s recognised standards.

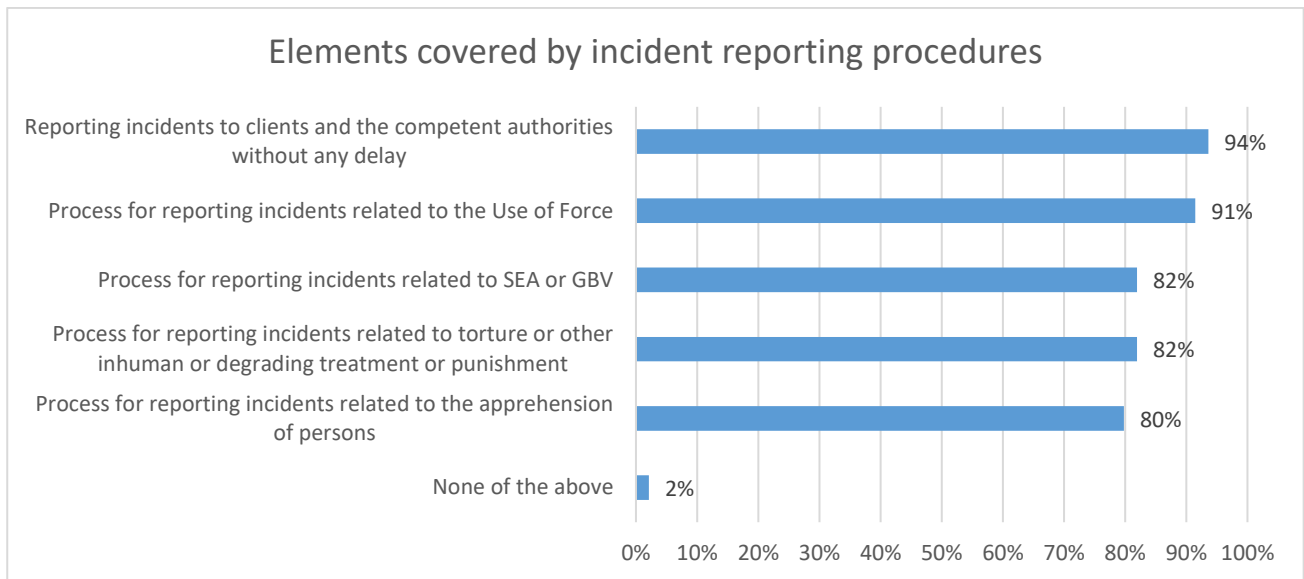


Figure 23: Elements covered by incident reporting procedures

A few companies reported that their incident reporting covers none of the elements stated in the CSA. When following up with them, they indicated that they have generic incident reports in place which are not specifically focused on these elements.

## Training

This section focused on how companies train their personnel and how the Code standards are included in the company's training curriculum. The Code requires Member and Affiliate companies to ensure that personnel performing security services receive initial and recurrent professional training including on the Code and applicable law. All such practical and theoretical training should be recorded and documented.

A majority of companies (96%) indicated that they train their personnel on the company’s Code of Conduct, incident reporting process and disciplinary procedures (see Figure 24). 87% of companies reported that they train personnel on the principles of the Code.

Based on company comments received and the slightly lower rate, there seems to be room for further guidance on what ICoCA expects from companies in practice with regard to training on the principles of the Code.

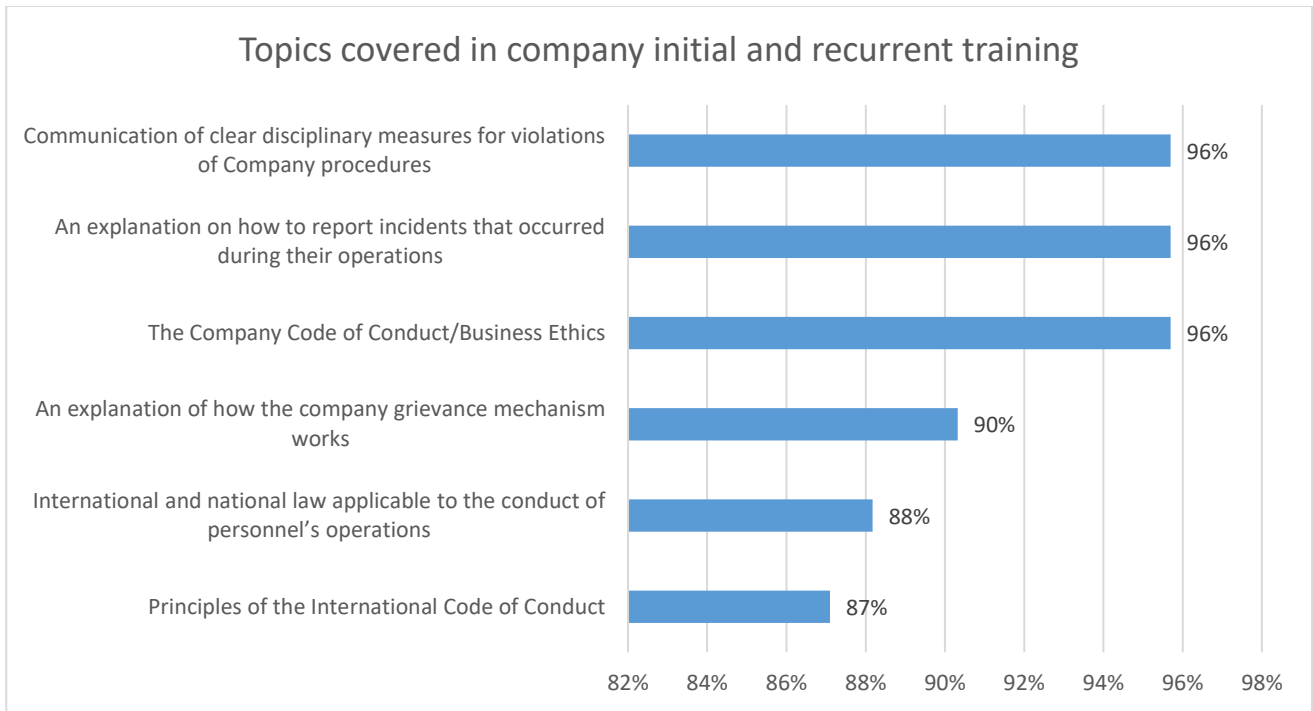


Figure 24: Topics covered by company initial and recurrent training

With regard to the frequency of the training provided, all companies provide induction and recurrent training. Most common seems to be recurrent training on an annual basis (see Figure 25).

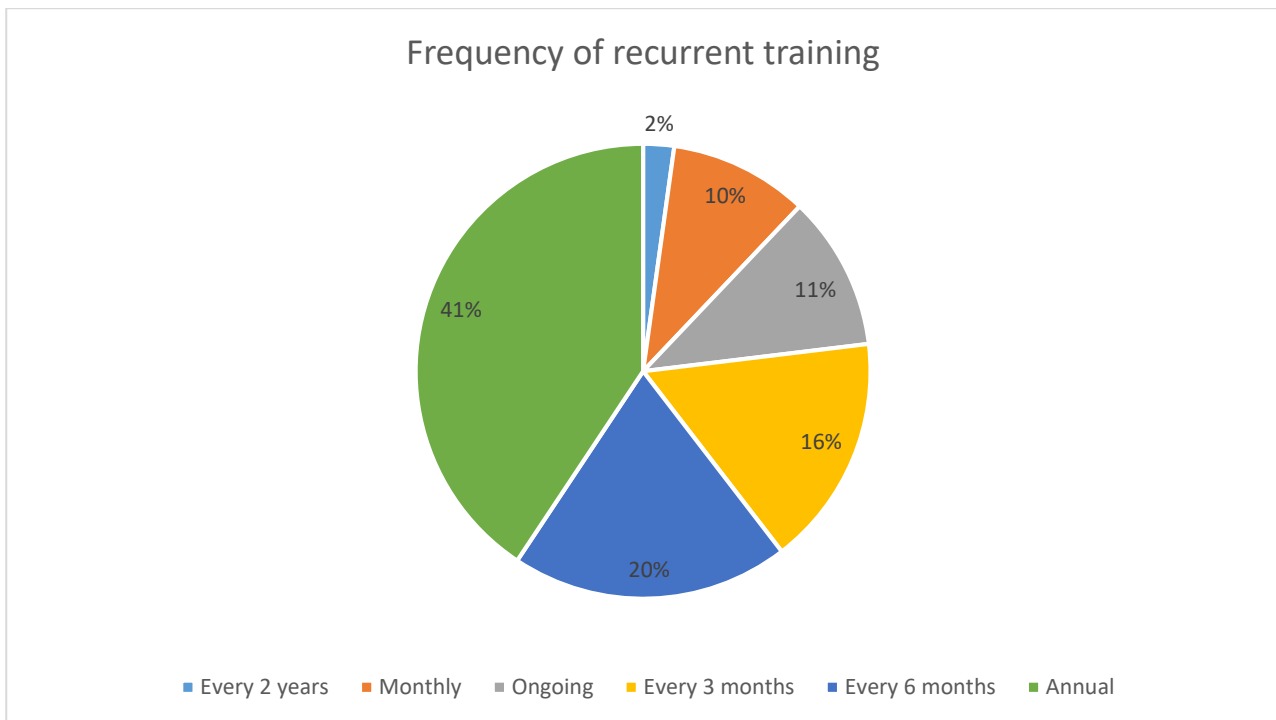


Figure 25: Frequency of recurrent training

Company responses regarding the frequency of training should be interpreted with care as, according to many comments received, it is not possible to generalise. The training package often is a combination of several types of training which require different frequencies. For example, human rights training is delivered less often than weapons training.

A comment received illustrates this well: weapons training would be delivered monthly, and then there would be a variety of trainings on a quarterly, bi-annual and yearly basis as well as every 3 years. Other companies explained that they would complement their training with intermittent “Toolbox Talks” or ensure that supervisors observe how personnel perform on a continuous basis. In terms of content for “practical training”, companies explained that this would include for example driving training, weapons handling, standing orders, discussing dos and don’ts, reviewing legal obligations, confirming client alignment, and ensuring that what companies are asked to do is not breaching their own standards. Some also adapt practical training to client or contract requirements.

97% indicated that they maintain records of all personnel that received initial and recurrent training.

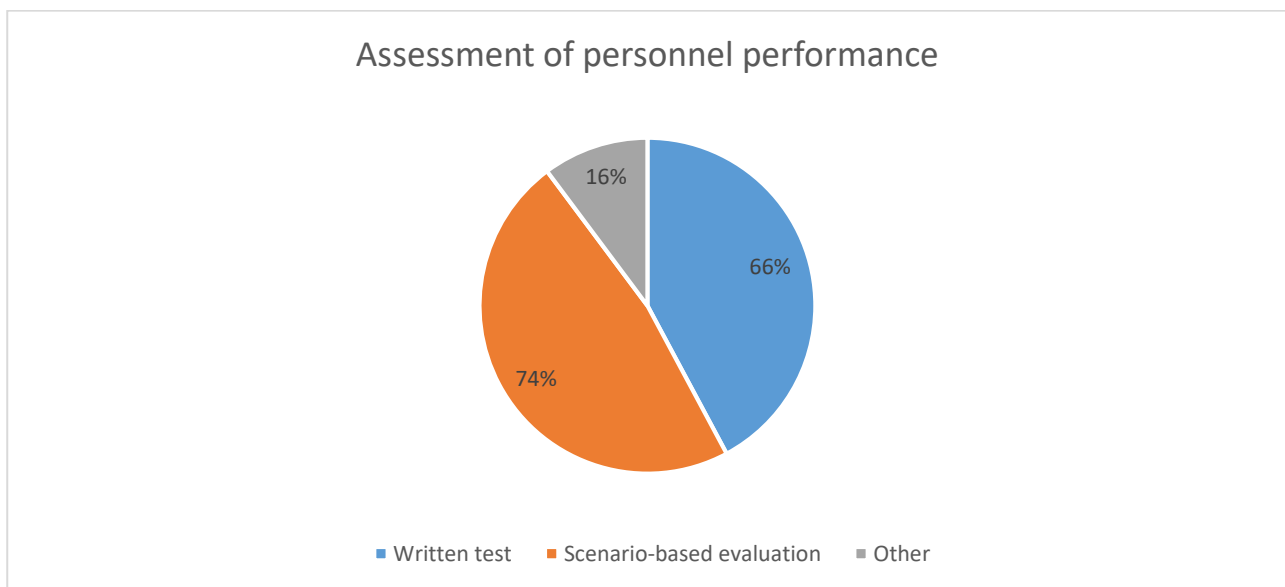


Figure 26: Assessment of personnel performance

Most of the companies (51%) reported that they review their training programmes on a yearly basis or as needed (see Figure 27), e.g. after incidents or if non-conformances are highlighted. They also indicated that training modules are reviewed when legislation changes, at the outset of a contract, and/or in line with contract deliverables if specified.

Some companies subcontract the provision of training to another provider. However, it is unclear if they ensure that the curricula of the subcontracted entity are reviewed and regularly updated.

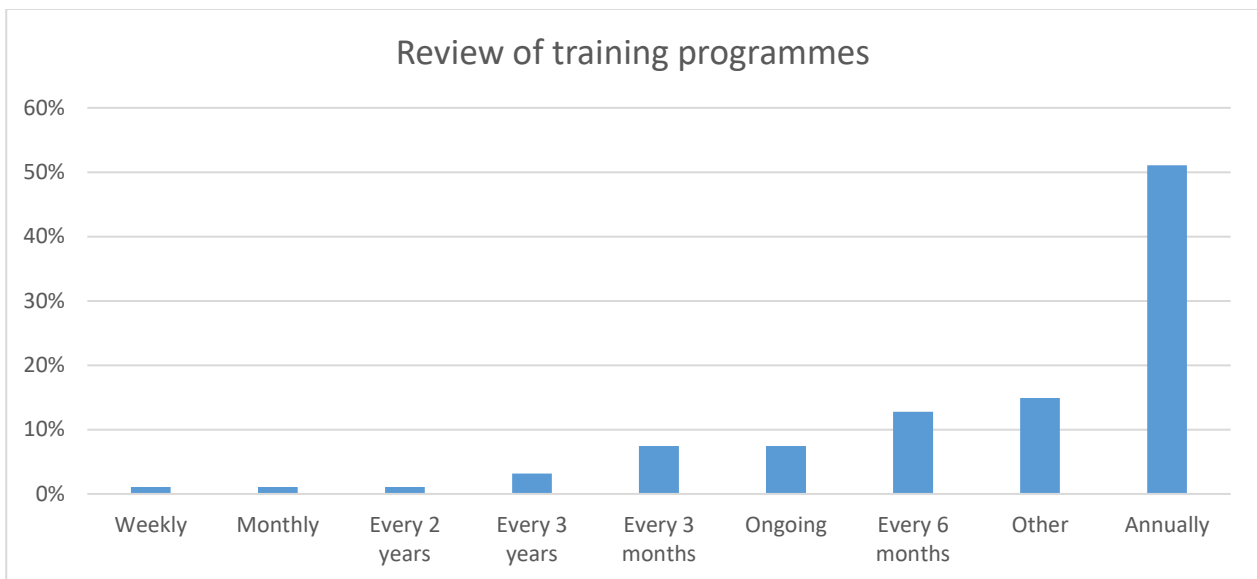


Figure 27: Review of training programmes and materials

96% of those 78 companies that offer services which may require the use of force indicated that they offer training on the use of force. 65% provide use of force cards to all personnel providing security services, whether they are armed or unarmed.

86% reported that they provide type and model specific weapon training for those who are to carry weapons while on duty.

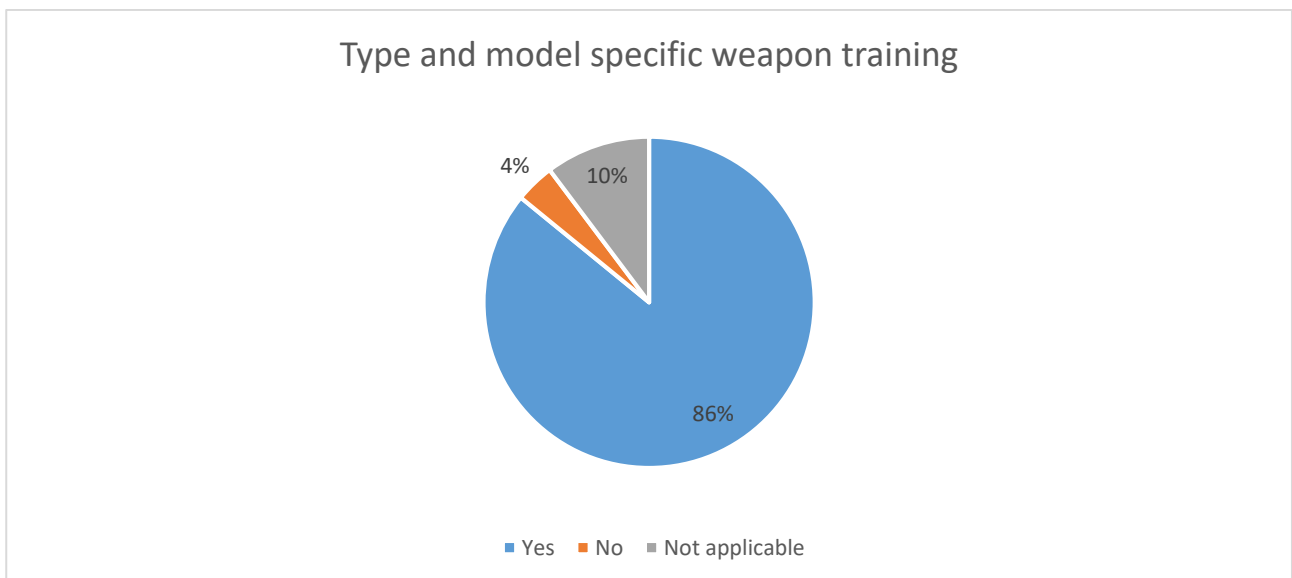


Figure 28: Type- and model-specific weapon training for personnel providing armed security services

Those companies that answered the question with “no” or “not applicable” explained that they are legally not allowed to train their own staff carrying weapons, or that they need to resort to the state’s armed forces or would not provide services which may involve the use of weapons. In the first case, armed personnel need to

use their personal weapon licences and are mandated to attend regular training sessions organised by the state’s authorities.

From these answers, there seem to be different views regarding what use of force encompasses. While some seem to only include the use of weapons, others interpret it in a broader sense.

Between 83% and 86% of companies indicated that they train their personnel in live firing, safe weapon handling and scenario-based training.

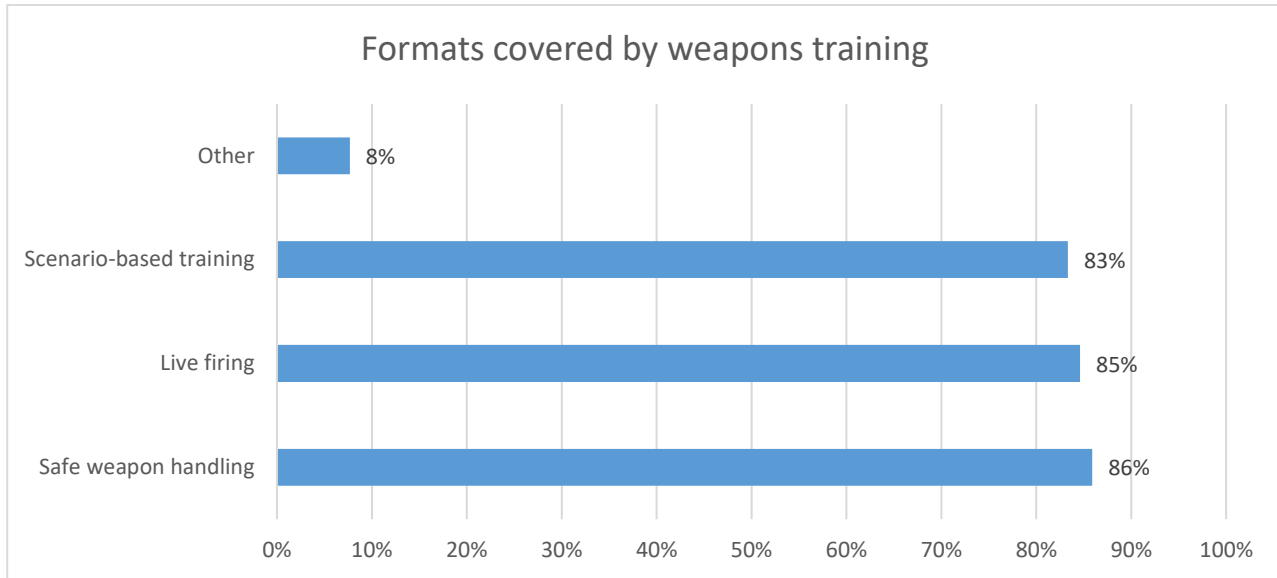


Figure 29: Formats covered by weapons training

One company specified that every month they provide the full suite of lessons for AK-47 and variants, taught through continuation training to all armed staff with Weapon Handling Assessments (WHA) at the end of each training session. Expatriate security staffs would also carry out AK-47 as well as Glock Pistol training and WHA monthly. In another case, all employees need to take weapon handling tests to ensure that they remain competent with their drills and can handle a weapon safely. Live firing practice is performed every 12 months.

Those that reported “other” explained that their weapon training also includes weapon cleaning, loading bay training, chamber flag training, contact drills and training on the rules for the use of force and rules of engagement. It is unclear why reference was made to the Rules of Engagement, a framework for military forces and not private security personnel operating as civilians. One comment also explained that the company would conduct administrative and license checks on the laws of the country in which they intend to be armed.

36% of those 78 companies that reported to provide services which may require the use of force indicated that they face challenges in accessing firing ranges in the environments where they operate, in particular in Iraq, Somalia, Afghanistan, Tanzania and Libya. There are only a limited number of ranges available, often controlled by public security forces and not accessible to private security personnel. If accessible, then there are restrictions in the form of limiting the amount of ammunition available for training or making it difficult to find available training slots. As an alternative, some companies resorted to the use of commercial ranges. These, however are in some cases challenging to access as they are located far away from where the company operates.

In other areas, the security situation is prohibitive for company personnel to access the training ranges.

A few companies indicated that they own their own firing ranges. And some indicated that the costs are prohibitive, as ammunition and trainers are expensive. In some environments it extremely difficult to purchase ammunition from the government which has the monopoly on weapons.

Lastly, challenges also depend on the type of clients and contracts, e.g. companies that provide services to governments do not face any challenges in accessing firing ranges.

To note that COVID-19 and the associated containment measures being adopted seem to have made it even more challenging for companies to train personnel in firing ranges due to the closing of some of these facilities and the restrictions in the number of personnel allowed to access them.

In terms of frequency of weapon training, companies reported a variety of approaches which often included a combination of different trainings. For example, live firing is provided less often than safe weapon handling training, one reason being difficulties in accessing firing ranges (see above).

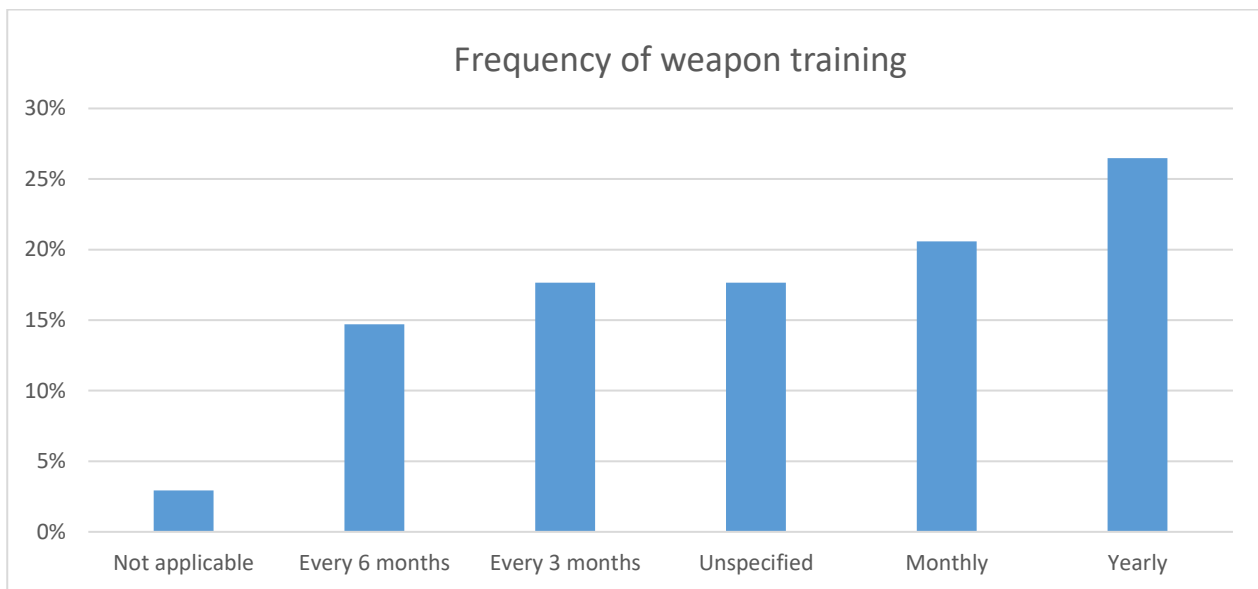


Figure 30: Frequency of weapon training

## Gender balance

This year, companies were also required to indicate the number of female and male personnel employed. Nearly all companies are male dominated with around 10% of female personnel employed overall. No statistics were recorded with regard to the specific roles of female personnel, although the comments received in bilateral engagements indicate that women are mostly employed in administrative positions.

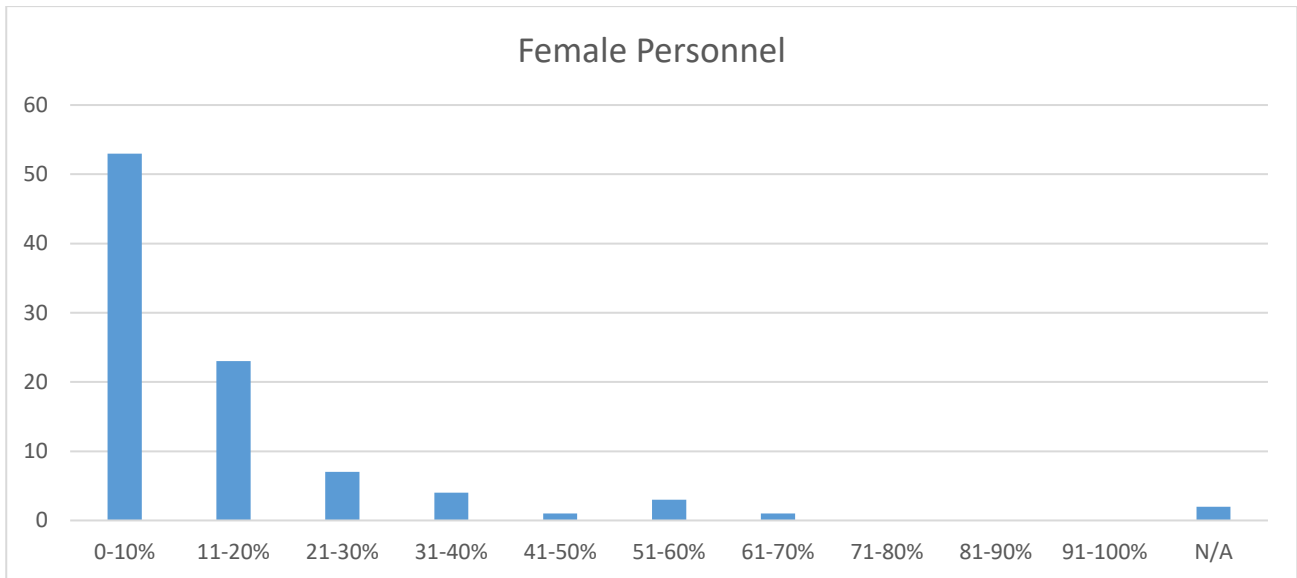


Figure 31: Percentage of female personnel in companies



## Certification

Confusion about third-party and ICoCA Certification persists within Members. 41 companies reported to be ICoCA Certified, while de facto only 29 of them had obtained ICoCA Certification at the time of their CSA submission. This indicates that 12 companies confused ICoCA Membership with ICoCA Certification, and mistakenly assumed that the granting of Membership in the Association equated to ICoCA Certification.

In addition, it should be noted that the continued perceived limited relevance to many companies of third-party certification to industry standards and ICoCA Certification, with a number of companies lamenting insignificant commercial benefits due to a lack of recognition by clients. Certification standards, as currently structured, are not particularly relevant for a number of companies as they do not reflect their operational realities, in particular for those companies that do not provide traditional security services such as kidnapping negotiations or risk management advice.

45% reported that they have not yet obtained third-party certification.

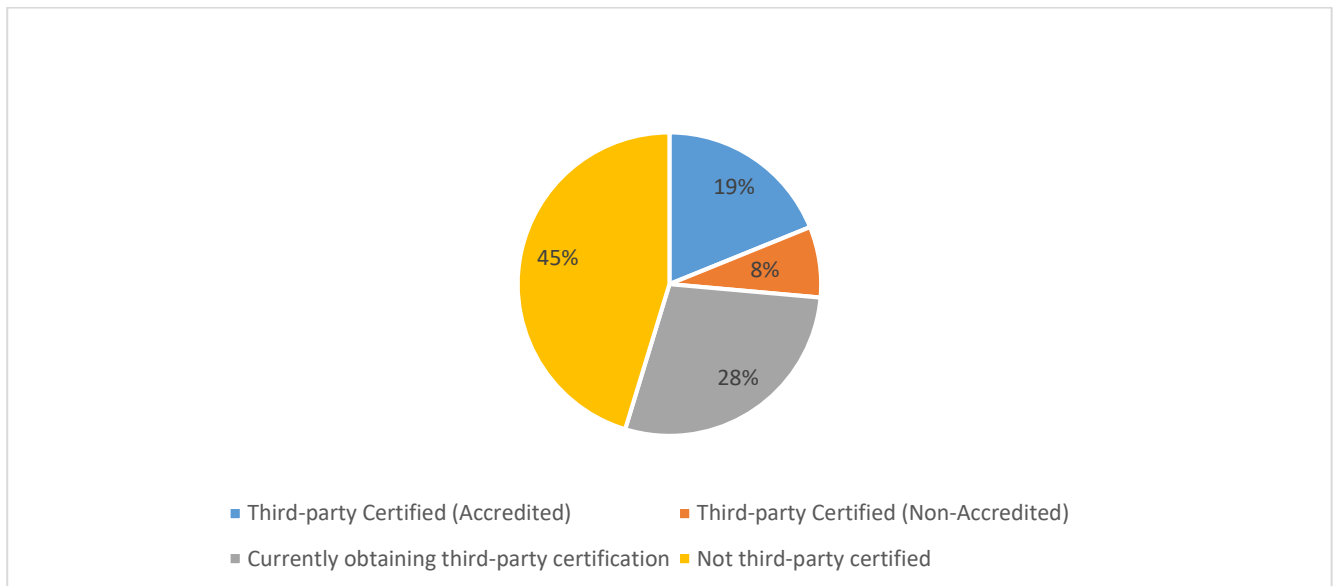


Figure 32: Third party certification status of non ICoCA certified companies

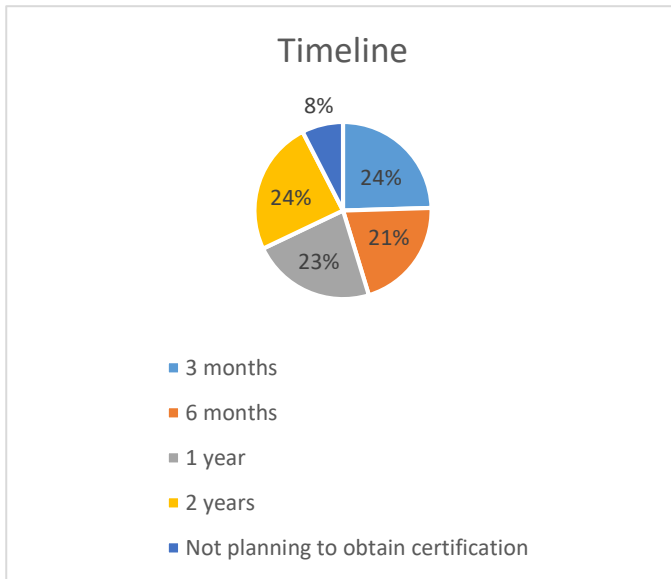


Figure 34: Estimated timeline to obtain ICoCA Certification

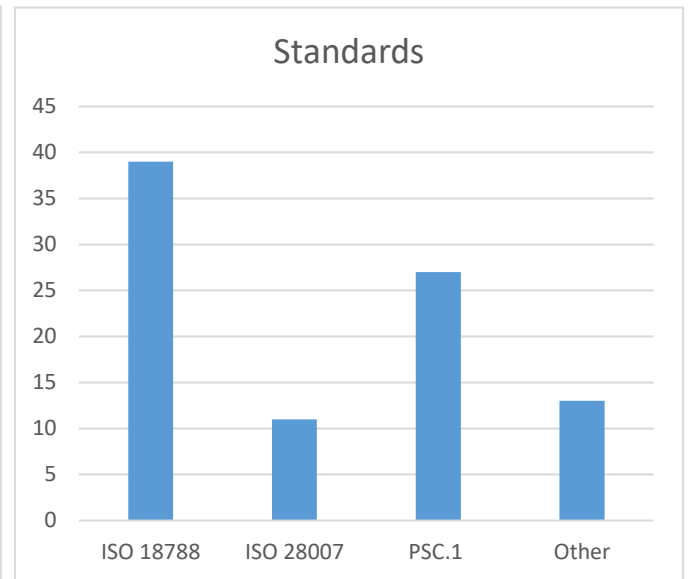


Figure 33: Third party certification obtained to standards

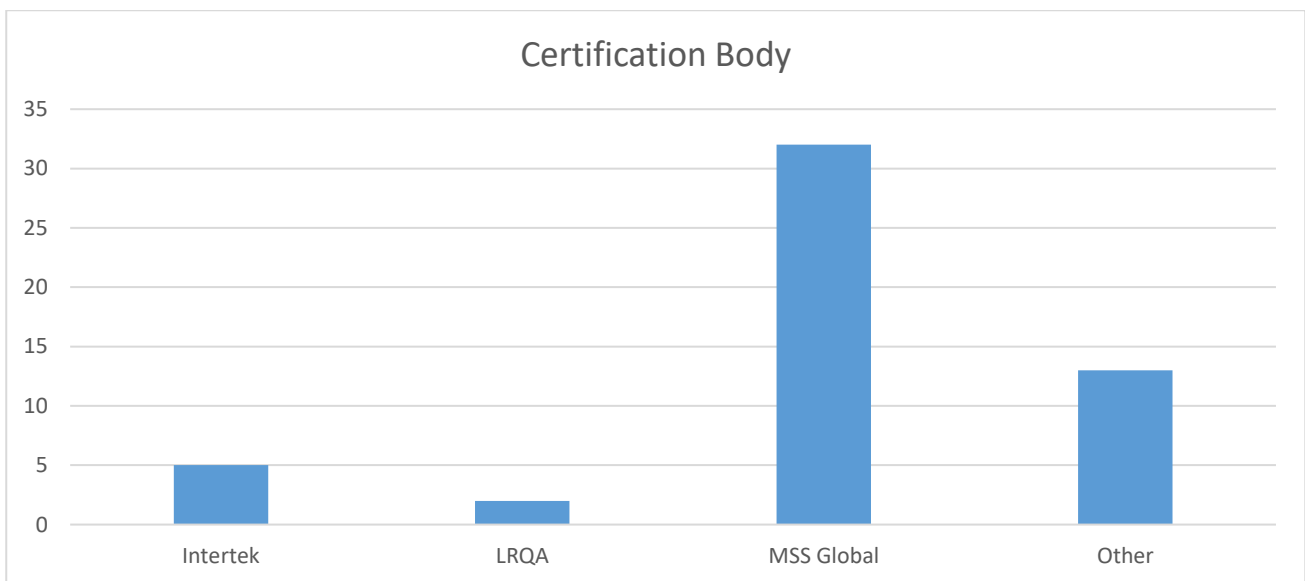


Figure 35: Certification Bodies used/planned to be used

Under “other”, companies specified that they use Certification bodies such as DNV GL - Business Assurance, APAVE, Gabriel Registrar Accredited by United Accreditation Foundation (UAF), Eurocert, ICONTEC or just “a local certification body”.

To note are the following comments received from companies regarding ICoCA Certification:

- “We continue to assess this and may seek in the next two years. Frankly however ICoCA certification is yet to be proved to us to hold commercial merit. We are not a guns and trucks company; we do

consulting which has crossover themes but evidently is not in full alignment with ICoCA members; we have lost bids with govts who are signatories of ICoC and who gave zero credit for our membership to ICoCA. This is frustrating. Our CEO has worked ethically for 23 years in the private security sector and has always sought to be held to moral and responsible conduct which is why we signed ICoC. So far as consultants we do not see the merit in spending for certification which is not a good fit. We are already heavily regulated by the law and international legal compliance.”

- “We believe that the accreditation we have stands for the ideas of ICoCA under 18788. The accreditation body we have is the one recognised in [our country] and the one we have used for years. I do not need other certification body besides the one I currently have. We hope that ICoCA expands its horizons regarding certification.”
- “Do not understand it, would be helpful if you could explain. Are we automatically approved for certification if we are ISO 28007 approved by MSS Global?”

## CSA submission

### Number of submissions and time

Of 105 Member Companies and Affiliates that were requested to submit the CSA, 94 (90%) did so. The majority of Member Companies submitted their CSA in September, with 35 companies submitting in the last 4 days before the deadline of 23 September 2020. 23 companies asked for an extension and submitted by 6 October. The condensed submission rates had implications on how quickly feedback was provided by the Secretariat, which nonetheless provided individualised feedback and followed-up with all companies in advance of the 2020 Annual General Assembly (AGA). Those that submitted around the deadline or later had to wait up to a month for their feedback.

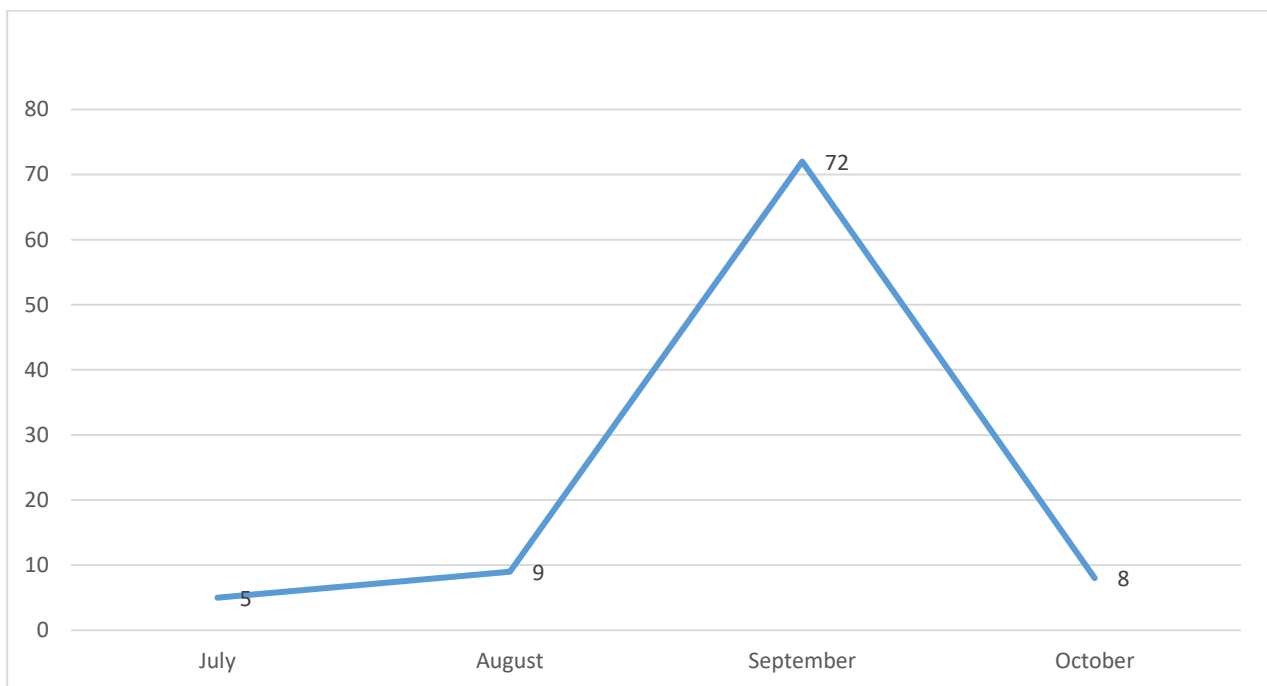


Figure 36: Month of CSA submission

## Feedback received

The final part of the Company Self-Assessment asked companies to provide feedback.

When asked in which areas they would appreciate further guidance, some companies expressed their satisfaction with the current level of support provided by ICoCA. Others pointed out that, in their opinion, the CSA overlaps considerably with the already existing standards.

Other companies, finally, sought ICoCA's assistance on the following subjects:

- Health and Safety: developing KPIs to measure the performance of the company's health and safety procedure.
- Human Rights Impact Assessments: How to build and conduct Human Rights Impact Assessments.
- Incident reporting mechanisms.
- Gender-based violence alignment with sexual harassment training.
- Training on the Code and human rights.
- Guidance on issues with third-country nationals and bonded labour.
- Rules for the Use of Force / Management of Weapons / Weapons Training.
- Applicability of some of the mentioned elements to maritime security.
- Information about ICoCA Certification. Create a pathway to simplified certification that is not prohibitive to small businesses.
- The provision of a consolidated list of clients requiring ICoCA Membership.
- Newsletters and webinars were thought as being useful in particular with regard to international developments with regard to human rights and guidance.

Some companies generally expressed their interest for further support, as the following comment illustrates: "We are in the process of implementing the ICoCA requirements hence putting up capabilities for the organization to do this in the right manner. We will appreciate support from you."

Companies reported that questions in the CSA linked to training of personnel (62%), Rules for the Use of Force (61%) and Human Rights Risk and Impact Assessments (56%) were most relevant for their operations. PSEA (38%) and modern slavery (35%) were considered as least relevant. It is unclear if this is because companies are less familiar with these topics and therefore do not know how these could be relevant for them, or if they have thoroughly evaluated these areas and concluded that the risk and impact would be low. The following comments might be illustrative:

- "In our operations we face very low probability of human trafficking and/or child labour".
- "Being certified to ISO18788 standard has meant that the ticked items have become an embedded part of the Company's culture - just the way we do things. Thankfully we have not experienced human trafficking or sexual exploitation directly although one is aware that it occurs in the countries in which we operate."

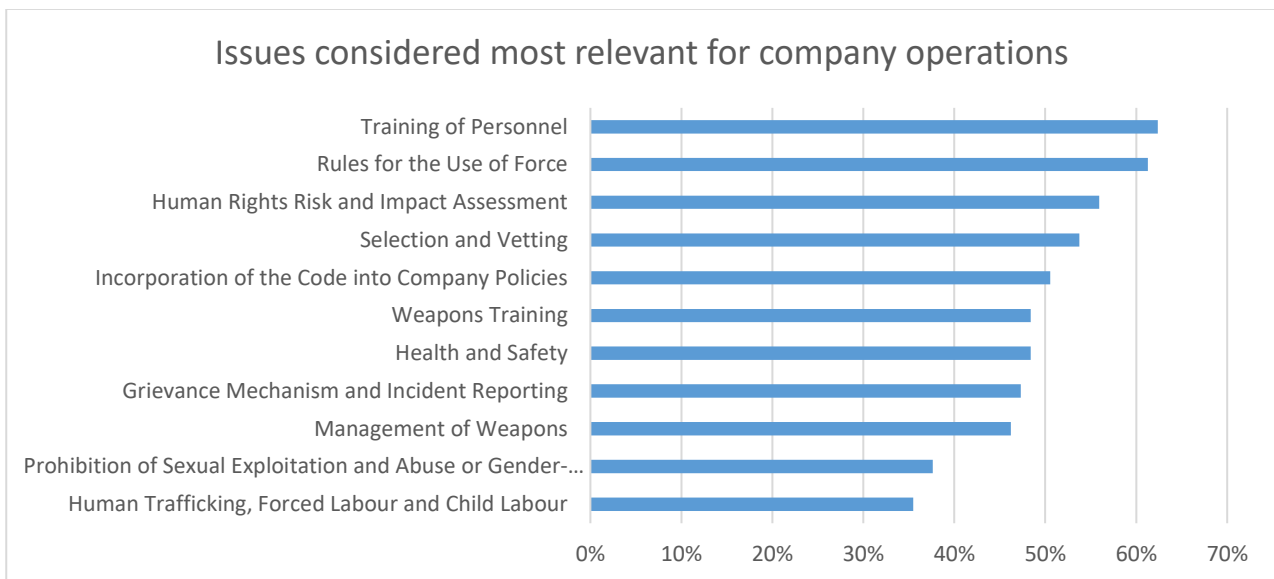


Figure 37: Issues considered most relevant for company operations

Many positive comments and suggestions were received from companies. Here is a selection:

- “The 2020 CSA is very easy to follow and makes it simple to address the requirements of the ICoCA CSA. This has been a very useful process for us and we have benefitted greatly from this year’s assessment. The structure is logical and easy to follow and clarity is clear and concise, with nothing overly complicated or unnecessary.”
- “The questions in this CSA are quite clear and a great self-assessment tool.”
- “I think it could potentially be less intensive for companies that have joined recently or may not be far through the process. Although it was relatively straightforward from our perspective an associate would probably have found it mind boggling. Of course, it may be different for new members or associates. Robustness is very important but it is worth considering how we can encourage companies to complete it as they go through the year. A suggestion could be that we tie it to short webinars where we look at each section in an informative way and then use nudges to encourage companies to complete in sections throughout the year.”
- “Generally, the assessment and its structure are clear; we find that still needs to be more focused into maritime security for companies whose service is only related to maritime areas.”
- “Please avoid using acronyms without defining them first in the section. One such incident was KPI in the Health and Safety section. It should be defined once typically in this style Health and Safety Key Performance Indicators (KPIs). It may have been done in the section instruction, but it would be good to have it on the page defined. I would also reduce the number of changes year-over-year which required new information that was not tracked in previous years. With a consistent company self-assessment similar to an audit, we should know what will be tracked and the changes expected for the following year so that preparation can be built into our surveillance and reporting programs. I would have also liked to see some data retention. Manually keying information that could have been retained and verified would have sped up some sections especially the Company Information Section.”
- “I was impressed with the level of detail and understanding that went into the questionnaire.”

- “As we have recently joined the association, this is the first year we participate the CSA, it is amazing how comprehensive yet compact is the process. It is self-explanatory, easy to follow and user-friendly.”
- “Because our operations are largely US and unarmed, much of the ICoCA fundamentals do not explicitly apply to our operations.”
- “Excellent, a very efficient and effective document.”
- “This is our second assessment and have realised an improvement. Most of the requirements have been integrated into our existing systems. Human rights training now incorporated for all levels but further guidance required.”