



# THE INTERNATIONAL CODE OF CONDUCT FOR PRIVATE SECURITY SERVICE PROVIDERS' ASSOCIATION (ICoCA)

## 2020-2021 ANNUAL REPORT



With travel restrictions still in place in many regions, over the past twelve months, ICoCA embraced the opportunity to develop new modes of operation, prioritizing objectives offering greatest impact. As a result, and despite the challenges of working in a virtual environment, the Association has made important progress in many key areas of the 2019-2023 Strategic Plan, with maximum efficiency that comes with a long-lasting tail.

This year, thanks to the generous support of the UK Foreign and Commonwealth Development Office (UK FCDO), along with core support provided by the governments of Switzerland, Sweden and the United States, ICoCA has developed and launched its first online learning course on the Prevention of Sexual Exploitation and Abuse. The course has been well-received by ICoCA's Member and Affiliate companies, becoming a mandatory requirement for personnel in a number of contexts. ICoCA has secured further funding from the UK FCDO to translate the course into multiple languages and to develop a second online course which will provide an overview of Section F of the Code, concerning the conduct of personnel.

The Association also launched its guidance document for private security providers on performing Human Rights Impact Assessments (HRIAs). Through our activities and thought leadership, ICoCA continues to strengthen its reputation as a sector-specific mechanism for the implementation of the UN Guiding Principles on Business and Human Rights which recently marked their tenth Anniversary.

Throughout the reporting period, ICoCA has remained focused on raising awareness about the Association and responsible security with users of private security. The Association has engaged in many different industry forums over the last twelve months, to underscore that responsible security begins with responsible procurement of private security services. It is only when clients of private security companies mandate Membership or Affiliation in ICoCA that they can be assured the human rights due diligence on their security providers is being conducted with the rigour required to minimize risks. The newly updated website highlights this focus of ICoCA's work, and a newly developed client Procurement Guide will be published and promoted in the months ahead.

The Association's partnership with the Global Interagency Security Forum (GISF) has deepened, allowing for a more targeted engagement with the humanitarian sector, as clients of private security in many contexts. ICoCA's recently released policy brief acts as a wake-up call to humanitarian agencies and their donors in this regard, reminding them of their duty of care when contracting private security providers.

ICoCA's monitoring missions are a cornerstone of ICoCA's work in ensuring that its Members and Affiliates are operating in compliance with the Code. With certain travel restrictions having been lifted, ICoCA was able to carry out a mission to South Sudan in November 2021. Looking ahead, it is hoped that, subject to the evolution of the COVID-19 pandemic, the Association will be able to resume in earnest more missions during 2022.

We hope you enjoy reading the highlights from this past year, and we look forward to continue working with you all in raising standards across the private security sector in the year ahead.

Yours,

A handwritten signature in black ink, appearing to read 'J.A. Williamson'.

Jamie Williamson  
Executive Director

A handwritten signature in blue ink, appearing to read 'F. Chenais'.

Frédéric Chenais  
Chairman of the Board of Directors

# 2020-2021 Annual Report

The Board of Directors of the International Code of Conduct for Private Security Service Providers' Association ("ICoCA"), in accordance with Article 8.1.2 of the Articles of Association of the ICoCA ("Articles of Association"), submits the following Annual Report to the Association General Assembly covering the time period from November 1, 2020 to October 31, 2021.

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## **1. Objectives of the Association**

The purpose of the Association is to promote, govern and oversee implementation of the International Code of Conduct for Private Security Service Providers (the “Code”) and to promote the responsible provision of private security services and respect for human rights and national and international law in accordance with the Code.

## **2. Governance**

### **2.1 Legal Status and Organisation of ICoCA**

ICoCA is an international multi-stakeholder not for profit initiative established under Swiss Association Law and headquartered in Geneva. ICoCA’s membership is made up of three pillars: government, industry and civil society. In addition to the Members and Affiliates, ICoCA can also grant non-voting observer status to parties which have demonstrated support for the principles of the Code and the Association. The Federal Council of Switzerland approved an agreement on the privileges and immunities accorded to the Association on July 3, 2019. Pursuant to this agreement, the confidentiality of ICoCA documents and information are protected, which strengthens ICoCA’s independence.

### **2.2 ICoCA Board of Directors**

The ICoCA Board of Directors is composed of 12 Members who equally represent the three pillars of the Association. The composition of the ICoCA Board of Directors at the end of the covered period was as follows (pillar affiliation and term expiration date indicated for each):

<b>Name</b>	<b>Seat Representing</b>	<b>Pillar</b>	<b>Term expiry</b>
Frédéric Chenais	Switzerland	Government	2022
Clifton Johnson	US	Government	2021
Annie McGee	UK	Government	2023
Vacant	Vacant	Government	
Michelle Quinn	The Americas	Industry	2023
Charlie Mayne	Rest of the World	Industry	2022
David Hornus	UK/Europe	Industry	2022
Jo Anthoine	At large	Industry	2023

Joel Bisina	Civil Society	Civil Society	2023
Carmen Rosa de Léon-Escribano	Civil Society	Civil Society	2023
Caleb Wanga	Civil Society	Civil Society	2022
Beatrice Godefroy	Civil Society	Civil Society	2021

### 2.3 Board Committees and Working Groups

During the 2020-2021-year, five committees were charged with managing and making recommendations to the Board in different areas of activity.

Committee	Members
<b>Executive and Finance</b>	<ul style="list-style-type: none"> <li>• Frédéric Chénais</li> <li>• Charlie Mayne</li> <li>• Beatrice Godefroy</li> </ul>
<b>Operations</b>	<ul style="list-style-type: none"> <li>• Frédéric Chénais</li> <li>• Beatrice Godefroy</li> <li>• David Hornus</li> <li>• Charlie Mayne</li> </ul>
<b>Complaints</b>	<ul style="list-style-type: none"> <li>• Joan Fontaine (on behalf of Annie McGee)</li> <li>• Clifton Johnson</li> <li>• Michelle Quinn</li> <li>• Caleb Wanga</li> </ul>
<b>Fundraising</b>	<ul style="list-style-type: none"> <li>• Jo Anthoine</li> <li>• Frédéric Chénais</li> <li>• Beatrice Godefroy</li> <li>• Michelle Quinn</li> </ul>
<b>Membership</b>	<ul style="list-style-type: none"> <li>• Clifton Johnson</li> <li>• Annie McGee</li> <li>• Michelle Quinn</li> <li>• Caleb Wanga</li> </ul>

### 2.4 Secretariat

The Secretariat, headed by the Executive Director, Jamie Williamson, is responsible for the development and implementation of the core functions of the Association as detailed in the Articles of Association, namely: certification; reporting, monitoring and assessing performance; and the complaints process.

On August 31, 2021, the Association signed a new Memorandum of Understanding (MoU) with the Geneva Centre for Security Sector Governance (DCAF) in effect until August 31, 2022. The MoU sets out three main areas on which DCAF and ICoCA agree to cooperate: government outreach through joint activities to promote the Code and the Association and to encourage greater government

involvement and commitment; building thematic capacities of key stakeholders on private security governance, including oversight capacities of civil society organisations, in-country working groups and the responsible procurement of private security services by clients; communication and awareness raising, by developing joint communication products and carrying out joint events.

## **2.5 Members and Affiliates**

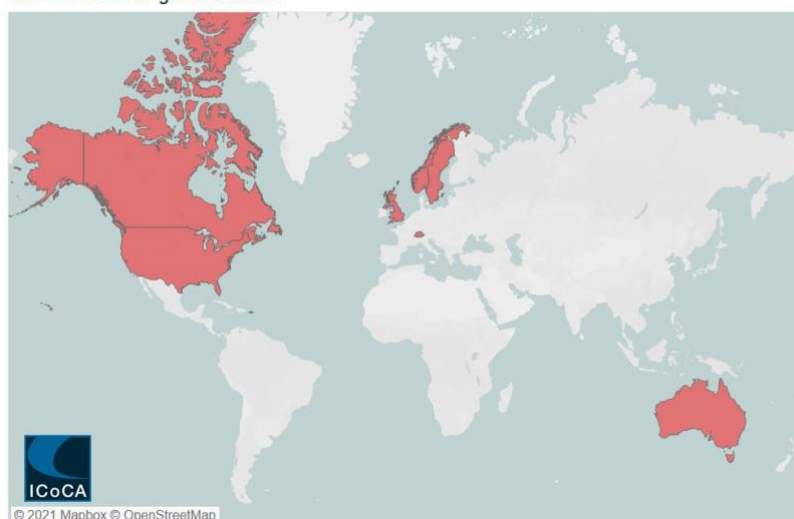
ICoCA is a membership driven and supported organisation. During the reporting period, 18 new Members joined the Association (3 CSOs and 15 Industry Members and Affiliates). A current list of Members and Affiliates can be found on the ICoCA website.<sup>1</sup>

# **3. Membership**

## **3.1 Government Membership**

Seven governments are presently members of the Association: Australia, Canada, Norway, Sweden, Switzerland, the United Kingdom and the United States. As members, and also as clients, regulators and donors, these Governments have enabled ICoCA to increase its sphere of influence globally to raise security standards and strengthen implementation of the Code in fragile and high-risk environments. ICoCA is particularly grateful to the United States, the United Kingdom, Switzerland and Sweden for their financial contributions to the Association during this reporting period. The Association welcomes the efforts of Member Governments to encourage ICoCA's membership and recognition, in particular with those countries which are members of the Montreux Document Forum (MDF). The Association looks forward to continuing to work with Members and other governments to help support and promote the role of ICoCA worldwide.

ICoCA member governments



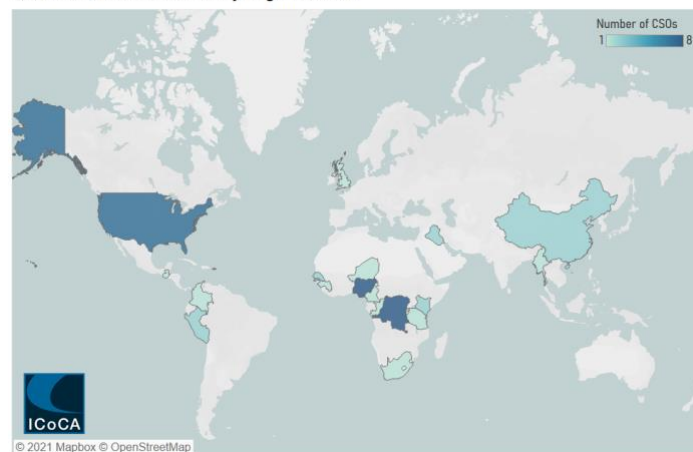
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<sup>1</sup> [www.icoca.ch](http://www.icoca.ch)

### 3.2 Civil Society Organisation Membership

Forty-four civil society organisations (CSO) were members of ICoCA as at the end of the reporting period, with three CSOs from three different countries (DRC, Guinea, Kenya, Senegal, and the United States) joining during the year. The 43 CSO Members represent 19 countries and operate in five main languages (Arabic, Chinese, English, French, and Spanish). A number of CSO Members also participate in other related initiatives, such as the Private Security Governance Observatory established by DCAF and/or the Voluntary Principles Initiative (VPI). The Association continues to support the role of CSOs in the promotion of the provision of responsible private security services, and works towards expanding the involvement of both regional and international civil society organisations in the Association.

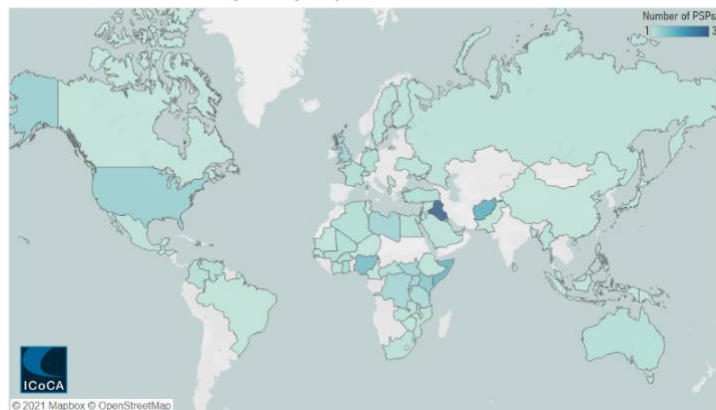
ICoCA Member Civil Society Organisations



### 3.3 Industry Membership

By the end of the reporting period, 101 companies made up the Industry pillar, 45 Certified Members, 22 Transitional Members and 34 Affiliates. Fifteen companies joined during the year including nine Affiliates. The Secretariat continues receiving applications for membership and affiliation on a regular basis, from an increasingly diverse and global reach. Industry Members and Affiliates have operations in 76 countries and 11 maritime locations. The 15 companies which joined during the last year come from five different countries (DRC, Iraq, Malaysia, Nigeria, and the UK). ICoCA Member and Affiliate companies range from small family owned local companies to large international companies with transnational operations, providing land as well as maritime security services and consultancy.

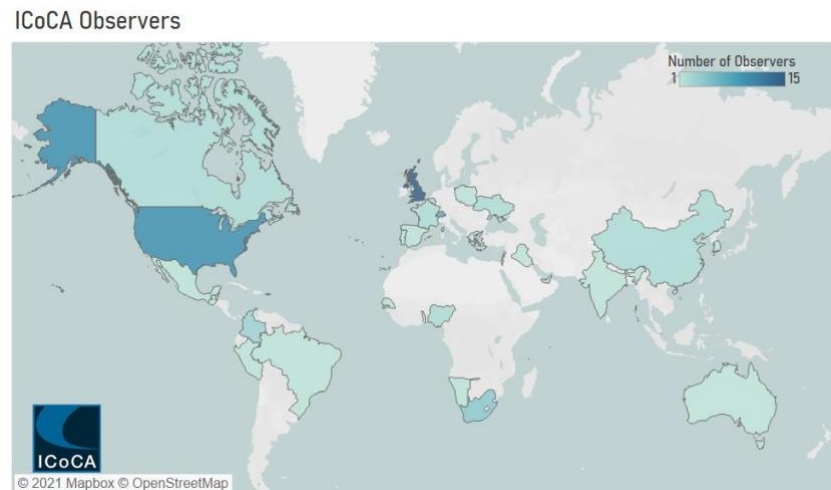
ICoCA members & affiliates, by country of operations





### 3.4 Observers

The Association also benefits from the engagement of 59 Observers, representing a diverse range of organisations and perspectives. Observers include clients of security companies, accredited certification bodies, consultancies, academic institutions, industry associations, non-governmental organisations and individual experts, which brings unique expertise and valuable insights to ICoCA's work. Fifteen observers joined ICoCA during the reporting period, and the Secretariat continues receiving applications on a regular basis.



## 4. Impact of COVID-19

As reported at the 2020 AGA, the COVID-19 pandemic demonstrated that adapting to an ever-changing operating environment cannot be an after-thought but must be at the forefront of the Association's planning. In 2020, the COVID-19 pandemic pushed for a certain re-evaluation of the security model and the manner in which private security can be delivered in accordance with the principles contained in the Code.

The prevailing state of uncertainty caused by COVID-19 continued to have an impact on the core activities of the Association during 2021. This has required operational realignments and adapted approaches to enable the Association to credibly achieve its mandate in line with the 2019-2023 Strategic Plan. The growing reliance on technological tools and platforms to carry out business, meetings, and communications, with less in-person physical interaction has catalysed a rethink of ICoCA's own operating model, especially related to capacity building. ICoCA is now fully embracing the possibilities offered by virtual online learning, including its potential to reach a far wider audience than in-person formats could ever offer.

Given the international nature of the Association, the impact of COVID-19 on the activities of ICoCA is difficult to fully quantify as it is dependent on the evolution of the pandemic and its management by the national authorities in the many countries where actual or potential ICoCA affiliates, members and observers operate. The economic downturn in many regions has financially impacted ICoCA Affiliates and Members across all three pillars, along with observers. This has put pressure on security companies in contexts where the 'race to the bottom' and cost margins are market drivers; on civil society organisations and their funding streams; on governments as donors; and on clients having to address possible cut backs along their supply chains.

On the upside, it seems that the pandemic is stimulating a re-think and bringing more attention to human rights and environmental issues, as a challenge to the existing economic models. Increasing calls for a 'Just Transition', highlighted during recent negotiations at COP 26, have the potential to position ICoCA and its Members and Affiliates at the heart of these debates. Given the rapidly rising demand for rare earth minerals, whose deposits are found in various complex environments around the world, now is the time to raise awareness and advocate that extractive companies and their clients require responsible security provision.

ICoCA is happy to report that with the easing of travel restrictions in many regions of the world, the Association resumed planning for in-person monitoring missions during the period. Planning for the first mission to South Sudan began in earnest during the summer, with the trip itself taking place outside of the reporting period in November 2021. If travel restrictions continue to ease, this will allow ICoCA to conduct more monitoring missions during 2022, subject to funding.

Nevertheless, given the unpredictability of global travel restrictions and ongoing COVID-19 related constraints, the 2021 Annual General Assembly is once again being held on line. All Board meetings were similarly conducted virtually throughout the year, though the hope is for in-person meetings to resume early 2022.

ICoCA has so far successfully delivered on the sustainability strategy developed to adapt to the challenges COVID-19 presented to ICoCA and its Members and Affiliates:

- **Objective 1:** to ensure that the Association is able to navigate the various phases of the COVID-19 pandemic.
- **Objective 2:** to ensure that the Association can adapt and build the required level of resilience to sustain its operations beyond the initial phases of the pandemic.
- **Objective 3:** to ensure that the Association remains relevant and credible during the COVID-19 pandemic and that it contributes to the debates regarding the security implications of the management of the crisis.
- **Objective 4:** to ensure that the Association is able to continue raising private security standards and contributing to policy debates regarding the provision of responsible private security in complex environments during and beyond the COVID-19 pandemic.
- **Objective 5:** identifying and securing funding opportunities for the Association in 2021 and 2022 in a globally negative economic environment and outlook.

## **5. Report Back on Implementation of the Strategic Plan 2019-2023**

The Strategic Plan 2019-2023 was adopted by the Board of Directors in May 2019. As outlined in the plan, the level of implementation of the respective objectives will be reviewed and reported annually. This Annual Report therefore includes the third report back on the Strategic Plan 2019- 2023. As highlighted in the previous section, the COVID-19 pandemic has required the Association to adapt its plans to the new operating environment brought on by travel restrictions, lockdowns and the need to safeguard staff.

## Goal 1

Build the capacity of private security companies to implement the Code of Conduct and become certified members of ICoCA

# OBJECTIVE 1.A

Develop training, guidance and development tools for ICoCA Member Companies to integrate provisions of the International Code of Conduct in their policies and practices

Produce guidance and training materials for 1-3 Code provisions annually

Make available training resources to Member Companies on issues specifically related to the content of and compliance with the Code

Design and establish mechanisms and platforms to enable the exchange of best practices and cooperation between PSC ICoCA Members

## 5.1 PSEA Online Training

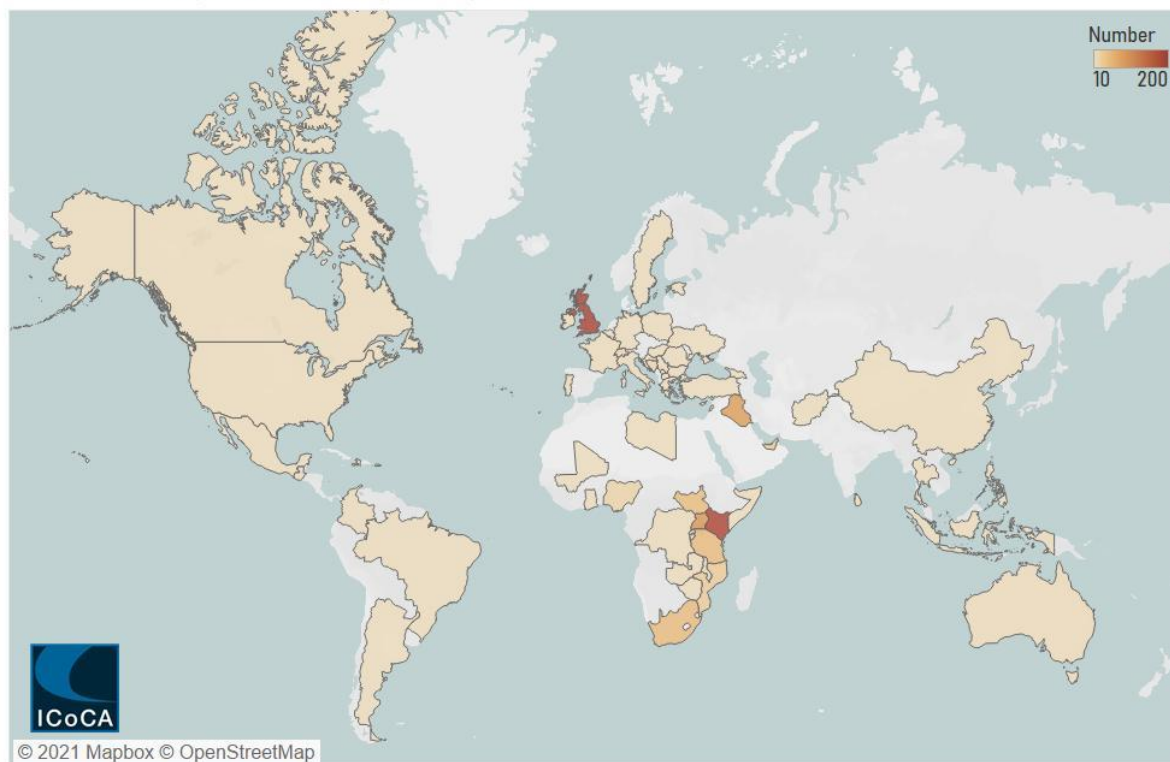
Funding from the UK Foreign and Commonwealth Development Office (UK FCDO) enabled ICoCA to develop its first online training course on the Prevention of Sexual Exploitation and Abuse (PSEA) in the first quarter of 2021. This four-module course is based on the ICoCA PSEA Guidelines that were published in 2019. The course was developed to be used as both a train the trainer programme as well as to be taken directly by security personnel with access to the internet. It is freely available to all Member and Affiliate companies and their personnel.

Developed through a consultative process with Member and Affiliate companies, the course was launched in May 2021 preceded by two workshops for Member and Affiliate companies and a public webinar convened to tackle some of the issues in delivering effective training. With over 180 people registering for the public event, interest has been high.

Feedback to-date from Member and Affiliate companies has been very positive and uptake so far impressive with almost 1,000 participants across 63 countries. GardaWorld has mandated the course for all corporate, management and administrative staff across the Security Services Middle East and Africa business, who must all complete the course as part of their training programme. The company is also using the ICoCA training as a basis for the classroom-based PSEA training which is delivered to the security officers within the East Africa business and the local staff and Gurkha Guard Force across the Middle East business. While their training is delivered face to face, the course is being adapted from the ICoCA online version with the company making sure content is maintained to ensure a consistent and comprehensive approach to the subject. Al Hurea are also planning to make the course mandatory for all personnel, and Landmark Security now require all management, middle level and

supervisors to take the course. We encourage similar policies to be adopted by other Member and Affiliate companies. Certificates are now available for all personnel who successfully complete the course.

### PSEA training, location of participants



*Almost 1,000 participants enrolled to date in 63 countries*

The UK FCDO subsequently provided funding for the PSEA course to be translated into Arabic, Chinese, French and Spanish. This work has been ongoing during the period, and should be available by the end of 2021. This will significantly increase the reach and impact of the course in different regions of the world, and with many more non-English speaking companies. ICoCA is eager to continue to translate the course into more languages so that it becomes even more accessible, and welcomes interest from any potential funders in this endeavour. Given clear impact the PSEA course is having in a very short period of time, the UK FCDO has generously provided funding for the development of a second online training course, which will provide an overview of Section F of the Code, on the Conduct of Personnel. Work has been ongoing to develop this course during the period, and it is anticipated that the course will be launched in the first half of 2022.

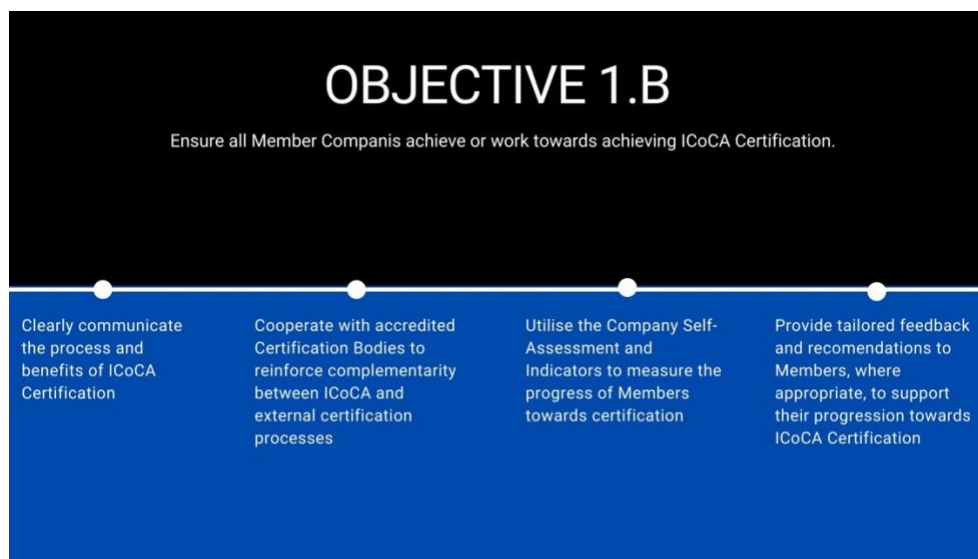
### 5.2 HRIA Guidance

The UK FCDO also supported the development of a Human Rights Impact Assessment (HRIA) Guidance for private security providers during the period. The purpose of the Guidance is to help private security companies implement the first step in human rights due diligence by assessing whether delivery of a contracted service might negatively impact the enjoyment of human rights and, for those operating in conflict-affected contexts, also possibly breach international humanitarian law. The Guidance provides an overview of human rights due diligence, separates out the elements of human rights impact assessments, and offers a number of recommendations based on best practice.

An English version of the HRIA Guidance was published online on June 15, 2021 and a webinar was convened to launch the guide and mark the 10<sup>th</sup> Anniversary of the UN Guiding Principles on Business and Human Rights. Approximately 220 registered, again indicating significant interest in this particular topic. The Guidance document is now also available in Arabic, Chinese, French and Spanish.

### 5.3 Continual Improvement

ICoCA Observer MSS Global partnered on making available a comprehensive suite of education resources developed by MSS Global 'Recognised Progression Education Resource Suite' freely available to all ICoCA Member and Affiliate companies. This self-help education resource supports companies to build their own strong, ethical governance structures, providing a guiderail to achieving ICoCA recognized standards: ISO 18788, ISO 28007 and PSC.1.



*Growth In Accepted Certification Bodies*

The overall objective of the ICoCA Certification procedure is to ensure that private security companies meet their obligations under the Code and engage with the Association in a constructive and transparent manner. To address the bottleneck caused by the small number of Certification Bodies accredited to the recognised standards of PSC.1, ISO 18788 and ISO 28007, in countries where specific accreditation to these standards is not available from IAF/MLA members, ICoCA now accepts evidence of certification to these standards from ISO 17021 accredited Certification Bodies that meet ICoCA competency requirements. ICoCA has conducted reviews of six ISO 17021 accredited Certification Bodies during the period, and now accepts accreditation to the recognised standards by a further four Certification Bodies.

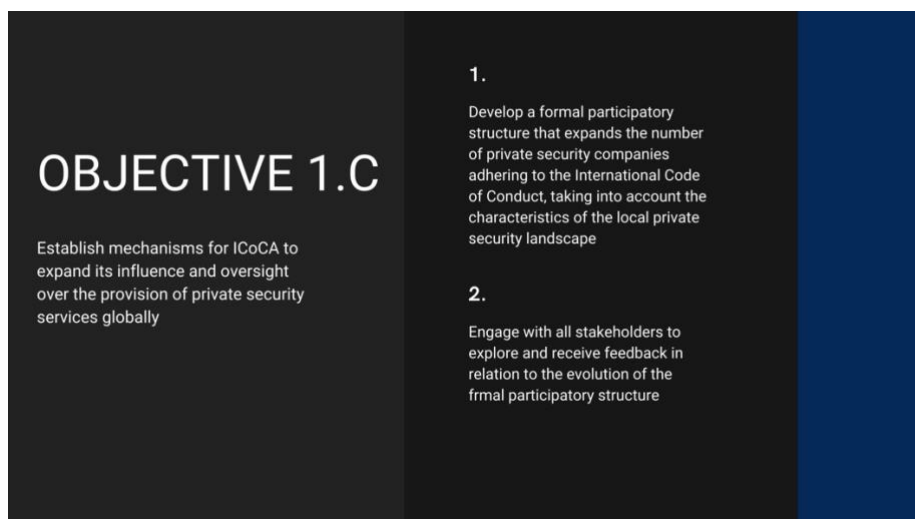
During the last year, 23 companies achieved ICoCA Certification for the first time, the most in any single year to date, including three companies that attained Certification from Affiliate status. A total of five companies also obtained ICoCA recertification. At the end of the reporting period, there were a total of 47 ICoCA Certified companies, representing the largest grouping of corporate Member or Affiliate companies.



*ICoCA Certified Member Companies*

ICoCA is formally participating in the Technical Committee for the 10 years' review of ANSI/ASIS PSC.1-2012, with meetings commenced in September 2021.





#### **5.4 SME Working Group**

The number of small, local companies joining ICoCA through Affiliate category status is steadily increasing, with currently 32 Affiliate companies, making this the second largest grouping of corporate companies that have joined the Association.

To recognise the different needs of this grouping, in March 2021, a Small and Medium Sized Enterprises (SME) working group was formed. This working group is piloting a mentorship scheme, to help guide companies along the path to responsible security provision. The Association continues to encourage Affiliates to strive for certification.

#### **5.5 Insurance**

ICoCA has also been working with insurance providers, to raise awareness amongst ICoCA Member and Affiliate companies and their clients about appropriate and responsible insurance coverage. A guidance document outlining insurance requirements for Certified Members was published on the ICoCA website on 18 June 2021, courtesy of ICoCA Observer, Chesterfield Group. ICoCA also invited the Hostile Environment Liability Programme (HELP) to present during a webinar in March 2021. The HELP programme offers reduced premiums to clients who contract ICoCA Member and Affiliate companies, recognising the reduced risk profile of these companies thanks to their responsible private security contracting practices, as well as offering financial support to go towards the cost of ICoCA Membership and Certification to private security providers that obtain their insurance through the HELP programme. Working with the insurance industry, ICoCA is raising awareness amongst clients and private security companies alike of the benefits of ICoCA Membership and Affiliation.

## Goal 2

Build upon and continue to develop effective systems for evaluating compliance with the Code of Conduct and addressing non-compliance.

### OBJECTIVE 2.A

Build an evidence-based system that supports routine monitoring and evaluation of Code compliance for all ICoCA Member Companies and a system to identify and address non-compliance question

1. Continue to strengthen the Association's oversight and accountability functions through in-person and remote dialogue with Member Companies; company self-assessments; field-based reviews and exchanges with other relevant stakeholders
2. Continue to develop and enhance company self-assessments to reflect the evolving security environment and any revisions in the Association's implementation guidance
3. Conduct field-based reviews and other periodic in-country evaluation missions of Member Companies' operations.
4. Solicit information from civil society organisations, open-source media, security experts and others pertaining to the particular characteristics of each operating environment, and potential factors that could increase the risk of abuses.

## 5.6 Field Missions

COVID-19 related travel restrictions throughout the world during the first half of 2021 continued to curtail plans for any field missions and in-person on-site monitoring during the period. However, as travel restrictions began to ease before and during the summer months, planning for the first post-lockdown field mission to South Sudan began in earnest during the summer. The field mission took place outside of the reporting period in the second week of November, 2021, when an ICoCA delegation travelled to South Sudan to meet with private security companies, clients and civil society organisations. A more detailed report on the trip will be forthcoming, and elements of this included in next year's Annual Report, however planning for the trip had the following objectives in mind:

1. To meet with ICoCA Member and Affiliate companies to discuss their efforts to implement the Code and the associated challenges, the impact of Covid-19 on company operations, and the evolution of the private security market in South Sudan;
2. To meet with prospective ICoCA Member and Affiliate companies to discuss their interest in the Association and its added value for private security companies (PSCs);
3. To meet with clients of PSCs and raise awareness on their due diligence responsibilities to ensure that contracted providers meet relevant standards, potentially by referencing ICoCA Membership or Affiliation in tenders and procurement policies;



4. To meet with a local civil society organisation engaged in a study on private security in South Sudan supported by ICoCA and discuss its preliminary findings; and

## 5.7 Weapons and Ammunition Management

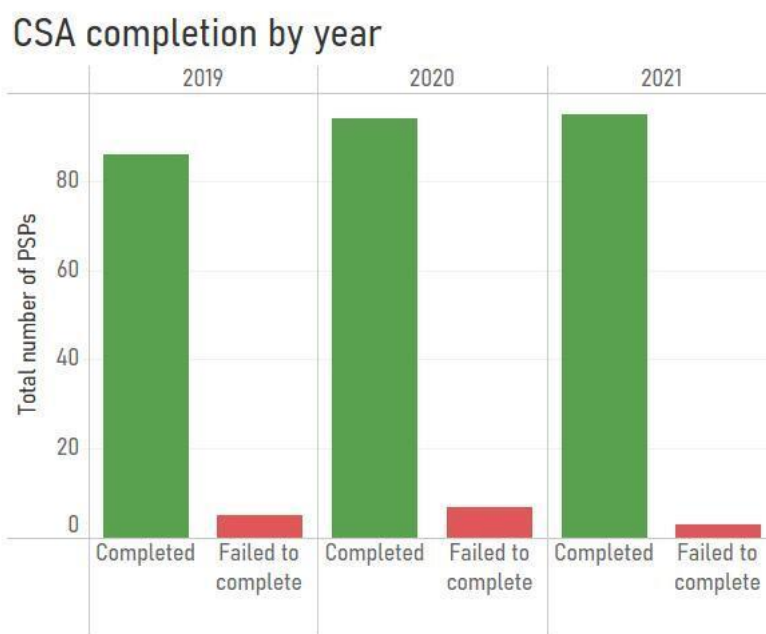
In its efforts to continue developing expertise and guidance on specific Code provisions, ICoCA has been collaborating with the Small Arms Survey (SAS) on a project to examine and improve understanding of the challenges that PSCs face in adhering to weapons and ammunition management (WAM) provisions in Articles 56-63 of the Code. The project will eventually provide examples of practical WAM policies and practices for PSCs to use in their efforts to adhere to these provisions. The project, which goes until end of January 2022, has already led to the inclusion of a new section on Weapons and Ammunition Management (WAM) in the 2021 Company Self-Assessment.

## 5.8 Company Self-Assessment

During the reporting period, and in line with the re-orientation of activities due to the COVID-19 pandemic, the Association has invested greater capacity in virtual, bi-lateral engagement with Member and Affiliate companies, which has included more intensive dialogue with companies during the 2021 Company Self-Assessment (CSA).

The 2021 CSA was shared with 98 ICoCA Member and Affiliate Companies (65 Member companies & 33 Affiliates) on 1 July 2021, with a deadline to submit by 29 September 2021. Eight companies asked for an extension. A total of 94 companies submitted the 2021 Company Self-Assessment. Three companies were terminated because of non-submission of their CSA.

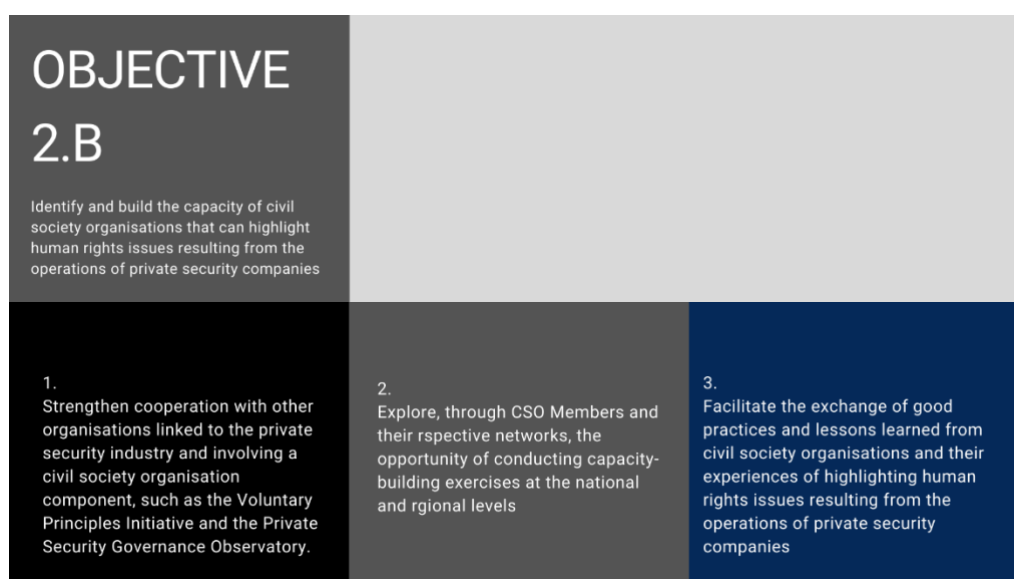
New indicators have been established focusing on HRIAs and, thanks to a collaboration with SAS, on WAM, which were included in the 2021 CSA.



*CSA Completion Rates From 2019-2021*

As seen above, the response rate has once again been high, with only four companies not submitting. Eight companies were granted submission extensions. The consequence for non-submission of the CSA remains termination from the Association.

The Secretariat is providing tailored feedback to each company that submitted its 2021 CSA. The majority of companies have received feedback to date and it is hoped that this process will be completed by the end of 2021. Main areas of feedback generally include: how companies communicate their human rights commitment internally and externally, how they identify human rights risks, how they monitor the performance of their grievance mechanism, accessibility of their grievance mechanism and how they provide training on the Code and PSEA. Company feedback on the CSA process points to an improvement in the CSA in terms of thematic focus, structure, length and clarity.



## 5.9 CSO Support

With the support of the UK through the Security and Human Rights Implementation Mechanism (SHRIM), ICoCA has continued working together with DCAF and developed a practical guidance tool for civil society organisations on supporting the implementation of the Code by private security companies. The tool development has been based on extensive stakeholder consultations in the Democratic Republic of the Congo (DRC) with the support of CSO Member the Observatory for the Study and Development of Social and Environmental Responsibility (OEARSE). Five workshops were held in DRC this year with support of selected CSOs. As a result of that, over 75 civil society organisations and 10 representatives of local regulatory authorities based in five provinces were introduced to, and provided feedback on, the practical guide. A virtual event was held in May to launch the practical guide for CSOs, with 140 registrations. The event held in French.

Discussions are underway with the VPI Secretariat to identify points of collaboration with Voluntary Principles in-country Working Groups and strengthen cooperation on CSO engagement. Further ongoing work on conducting CSO studies on private security trends will continue.

## 5.10 Complaints

During the past year, no Member Companies reported registering complaints or incidents. Four companies reported that they had compliance concerns regarding misconduct of personnel. Three

companies had membership terminated due to non-submission of the annual Company Self-Assessment, with another one potentially forthcoming.

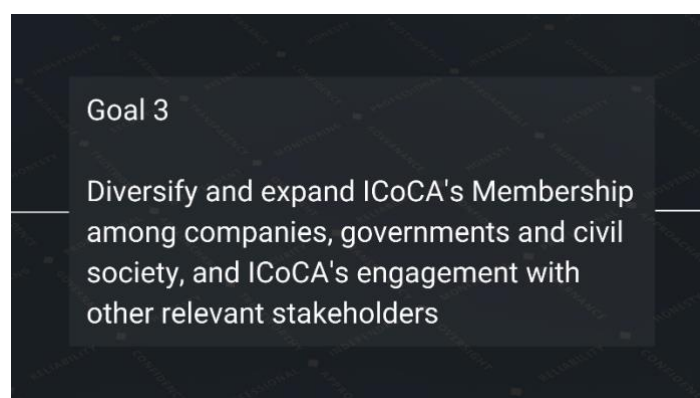
Active Compliance Concerns at the end of November 2021			Status
Personnel Misconduct	Management and Governance	Other	Active
1	3	1	

Compliance concerns since ICoCA is operational (closed and active)			Status
Personnel Misconduct	Management and Governance	Other	8 closed; 5 active (above)
3	7	3	

Complaints Received in 2021			Status
Total	Alleging a Violation of the Code	Against Member Companies	3 Active, 3 closed
6	2	1	

Complaints Received since ICoCA is operational (closed and active)			Status
Total	Alleging a Violation of the Code	Against Member Companies	3 Active
35	0	7	

Terminations of Company Membership or Affiliate status in 2021		
Total	Non-Submission of Annual Company Self-Assessment	Cooperation in Bad Faith
12	3	2



## OBJECTIVE 3.A

Increase awareness and buy-in of ICoCA by governments in different regions and intergovernmental organisations

Participate in meetings of the Montreux Document Forum and engage with relevant UN Working Groups and other international and regional bodies to increase awareness of ICoCA as a key actor to raise standards in the private security industry.

Broaden outreach to non-member governments and intergovernmental organisations to improve their understanding of the role and purpose of ICoCA and encourage participation in the activities of the Association, where appropriate.

Encourage the development and implementation of regulations or policies by governments and intergovernmental organisations related to the private security industry, including procurement regulations, which refer to ICoCA.

Encourage governments to integrate ICoCA into National Action Plans on business and human rights.

ICoCA has actively engaged through remote meetings and international forums, including the Montreux Document Forum (MDF) and the UN Working Group on Mercenaries. In June 2021, David Hornus, ICoCA Board Director, presented at an MDF Forum meeting. A further presentation at the MDF forum in September focused on Human Rights Due Diligence.

Particular focus has been placed on engagement through CSOs in Nigeria during the last twelve months. This included: a presentation in May on a webinar in partnership with the New Nigeria Foundation on 'Mainstreaming the Private Security Sector in Nigeria's Security Architecture'; a presentation at the ICoCA Observer, MSS Global, Africa Conference in June; and a presentation at a meeting convened by CSO Member AfriLaw in October to representatives of the Nigerian government, including the Interior Ministry, Ministry of Foreign Affairs and the Ministry of Defence, to advocate for the Nigerian government joining the MDF and ICoCA, which resulted in the formation of a 'Nigeria MDF/ICoCA Membership Working Group'.

## OBJECTIVE 3.B

Increase the number of private security company clients encouraging or requiring ICoCA membership in contracting for security services.

Engage with clients to increase their awareness of ICoCA and encourage them to reference it in relevant procurement language and policies.

Provide advice on clients' procurement policies and generate model clauses in relation to private security standards and compliance with the Code of Conduct.

Engage with other entities that have a vested interest in the mitigation of risks by clients, e.g. investors, insurers, banks and trade associations.

### **5.11 Client Engagement**

In the first quarter of 2021, the UK FCDO funded the development and rollout of an online marketing campaign targeting clients of private security companies, to raise awareness about ICoCA and to encourage them to contract ICoCA Member and Affiliate companies. The campaign culminated in a webinar held at the end of March that showcased the collaboration between ICoCA and Philip Morris International (PMI), including how ICoCA have been guiding PMI on responsible security provision, and the HELP insurance programme and its benefits to clients. Approximately 330 people registered for the event, including representatives from multi-national corporations with whom ICoCA has had no previous engagement, such as Starbucks and Unilever. The campaign significantly contributed to raising awareness amongst clients about the benefits of contracting ICoCA Member and Affiliate companies.

ICoCA has engaged bi-laterally with a number of multi-national corporations throughout the year, to raise awareness about the Association and to advocate for the introduction of ICoCA Membership requirements in procurement policies throughout their private security supply chains. The Association has continued to seek out opportunities to engage in other industry forums to raise awareness about its work and to shine a spotlight on the human rights risks in contracting private security providers. Other notable webinars include:

- UN Global Compact Switzerland & Lichtenstein convened a webinar in June , with ICoCA both moderating and presenting along with Glencore and Syngenta.
- Co-convened a webinar with the Voluntary Principles on Security and Human Rights in April as part of the OECD Forum on Responsible Mineral Supply Chains. Around 230 registered for the event, including representatives not only from many extractive companies who contract private security but also responsible sourcing executives from downstream companies such as Apple.
- Presentation at Copper & Human Rights Roundtable organised by Institute for Human Rights and Business (IHRB) in May.
- Presentation at Swiss FDFA & SECO organised workshop: 'Respecting Human Rights in Energy Trading' also in May.
- Presentation at the Entreprises pour les Droits de l'Homme (EDH), Paris.

### **5.12 Humanitarian Sector**

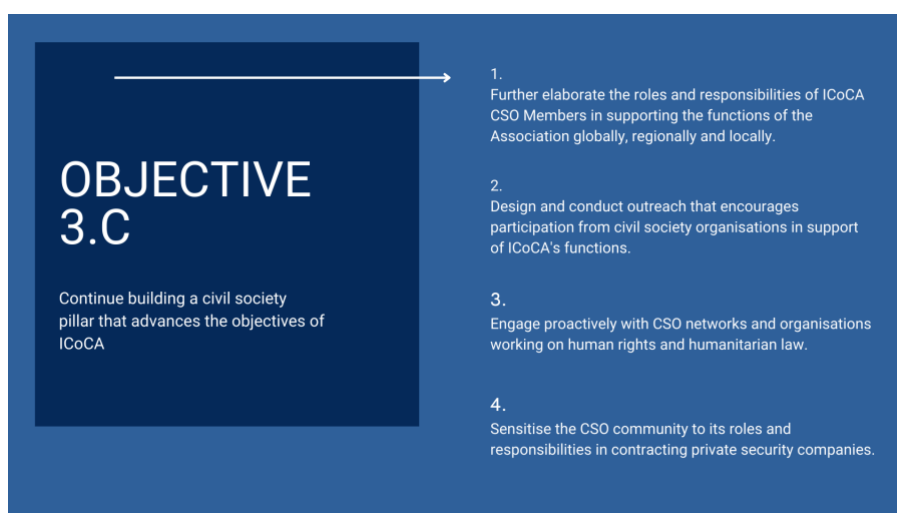
ICoCA deepened its collaboration with the Global Interagency Security Forum (GISF) during the year, with the objective of furthering its engagement with clients in the humanitarian sector. Responding to a call for support for a Young Professional Fund, GISF agreed to co-fund, with ICoCA, an internship position to build on module 14 of GISF's 'Security To Go' toolkit, which ICoCA and GISF co-developed in 2020 on the procurement of responsible private security companies for humanitarian agencies. An intern was recruited to conduct outreach, research and build out a new training course based on the module. Findings from the research, which included a survey of GISF's 125 members, were compiled into a policy brief, which was launched during a webinar in October. The full research report was released in November 2021. ICoCA also presented at the USAID PLSO forum for South Sudan the week before the webinar launch, at which in country security managers for USAID implementing partners attended.

### 5.13 Procurement Guide

ICoCA has developed a Private Security Provider Procurement Guide, which will be hosted on ICoCA's website. ICoCA is once again grateful for the support received from UK FCDO who are funding the roll-out of the guide through a campaign which will run up until March 2022. The objective of the campaign will be to promote the guide to clients of private security companies across all sectors.

As part of the development of the guide, ICoCA took part in a one-day workshop organised by AfriLaw in association with DCAF, which brought together members of the VPI Nigeria working group, along with other clients of private security companies based in Nigeria. Elements of the guide were presented to the group, and feedback solicited to help strengthen the impact of the guide. Discussions are also underway with the VPI secretariat about engaging the VPI Members HQ representatives on the guide.

Discussions are continuing with a number of investor groups about raising the profile of private security contracting risk in their investment portfolios.



The critical role CSOs play in the Association has continued to be more important than ever, especially considering the impact COVID-19 has continued to play on the Secretariat's ability to travel. CSOs, such as AfriLaw and New Nigeria Foundation in Nigeria, Iraqi Al-Amal Association in Iraq, Usalama Reforms in Kenya, and OEARSE in DRC have worked tirelessly in continuing to focus attention on the issues of responsible security with key-stakeholder groups, including the private security sector, clients of private security companies, regulators and the media. In October, for example, ICoCA participated in a one-day workshop convened by AfriLaw which brought together senior executives from Nigerian owned private security companies to raise awareness about the Association, and to discuss issues of governance and management of responsible private security companies, as well as how to conduct HRIAs. For ICoCA to be able to participate in these hybrid sessions, presenting virtually to people who have come together in person, has enabled the Secretariat to maintain and increase its level of in-country engagement at minimal cost.

In Q3 2021, ICoCA also initiated regional studies on private security trends in partnership with its CSO Members. The objective of these studies is to provide a knowledge basis for both CSOs and ICoCA so to identify priority areas where further work is needed to address human rights challenges as well as key actors who might play a leading role in raising private security standards in their respective environments. Studies are currently being conducted in East and West Africa and the Middle East, supported by ICoCA and led by CSO Members.



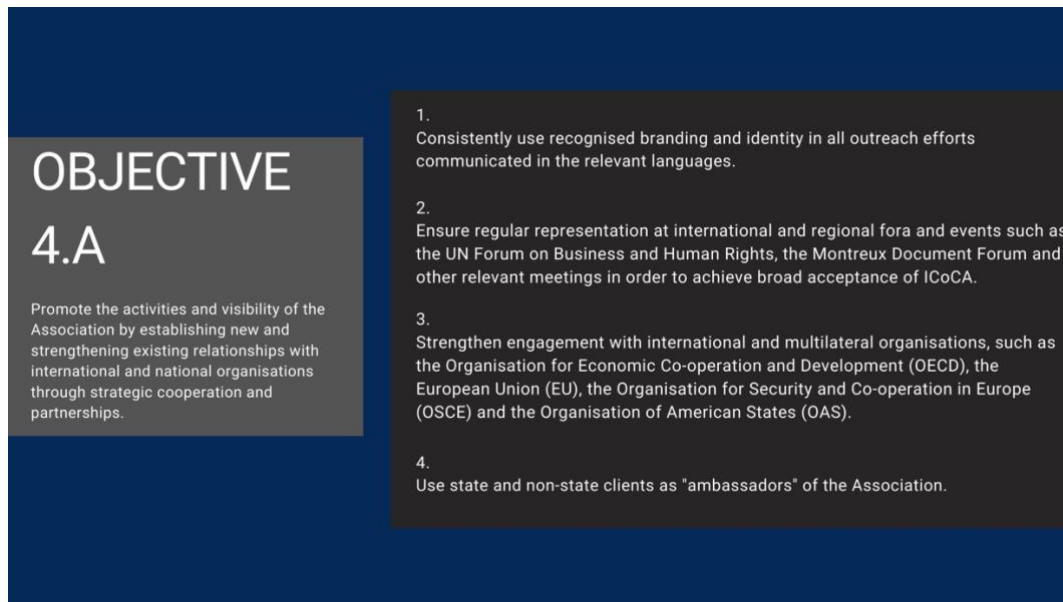
A number of CSOs have joined the Association during the year, including New America from the USA, the Centre du Commerce International pour le Développement (CECIDE) from Guinea, the Syndicat National des Convoyeurs de Fonds et Agents de Sécurité (SY.NA.CO.FAS) from Senegal, Kijiji Yeeu from Kenya, and Securitas Congo from DRC.



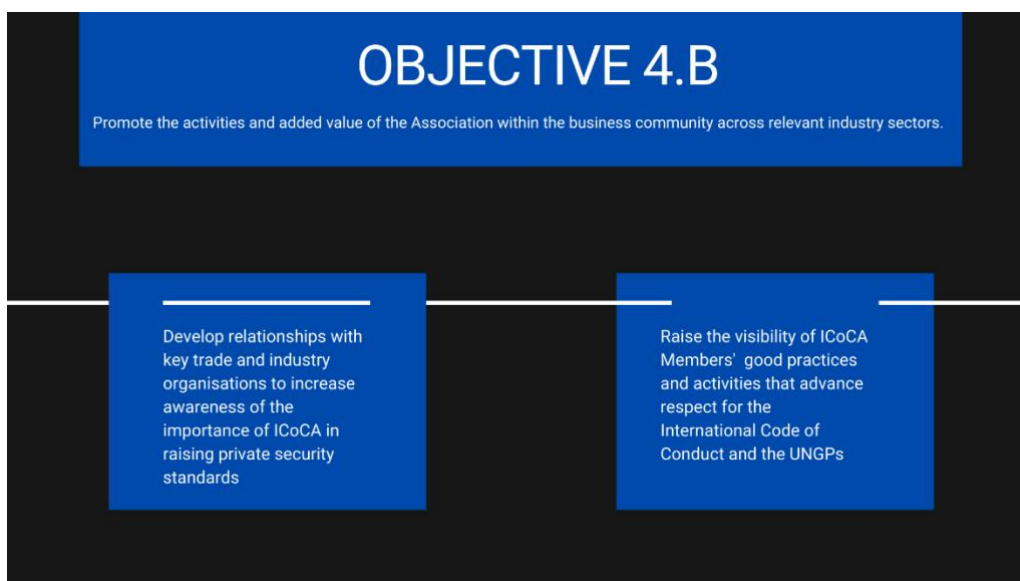
*Attendees at a 'One Day Training Workshop for Review and Development of Internal Documents of Private Security Companies' convened by AfriLaw in collaboration with DCAF & ICoCA*

#### Goal 4

Develop and protect a distinct and credible worldwide brand reflecting ICoCA's leadership role



As mentioned under 3.A, ICoCA has actively engaged through remote meetings and international forums, including the Montreux Document Forum (MDF) and the UN Working Group on Mercenaries. In June 2021, David Hornus, ICoCA Board Director, presented at an MDF Forum meeting with a further presentation at the MDF forum in September focused on Human Rights Due Diligence. As also mentioned, ICoCA marked the ten-year anniversary of the UN Guiding Principles on Business and Human Rights by convening an event that also featured Anita Ramasastry, Chair of the UN Working Group on Business and Human Rights, who recognised in her remarks how ICoCA is playing a leading role for other business sectors to follow as a sector-specific example of UNGPs implementation. Finally, as also mentioned, ICoCA co-hosted an event with the VPI as part of the OECD Forum on Responsible Mineral Supply Chains. ICoCA presented to the Dirección General de Servicios de Seguridad Privada (DIGESSP, Guatemala) in cooperation with the UK and Swiss embassies, DCAF and ICoCA CSO Member IEPADES in June.





During the period, ICoCA presented at the Copper & Human Rights Roundtable organised by the IHRB, as well as a presentation at Swiss FDFA & SECO organised workshop, 'Respecting Human Rights in Energy Trading'. In June, ICoCA attended a DCAF South Asia Security Forum. In September, an online presentation providing an overview of ICoCA was given to a Namibian private security industry association. Jamie Williamson, Executive Director of ICoCA, attended and presented at ISOA's annual meeting in Washington DC in October 2021. ICoCA also presented at a meeting of the Responsible Mining Foundation held in October 2021, contact was established between Entreprises pour les Droits de l'Homme and ICoCA during a presentation to EDH members. EDH is a business Association focused on business and human rights bringing together 22 of the largest multi-national French companies across all sectors. ESG research was conducted and a white paper has been drafted with the intention for future engagement of the finance investment community.

All of ICoCA's public online meetings are recorded, made available and promoted through ICoCA's website and social media channels. To date, ICoCA has published 44 videos on its YouTube channel, which now has over 100 subscribers, these videos have received over 6,600 views. ICoCA also continues to produce Podcasts in its 'Future Security Trends' series, which now has 14 episodes and over 1,400 downloads. ICoCA has over 2,000 followers on LinkedIn, and continues to focus on growing this group.

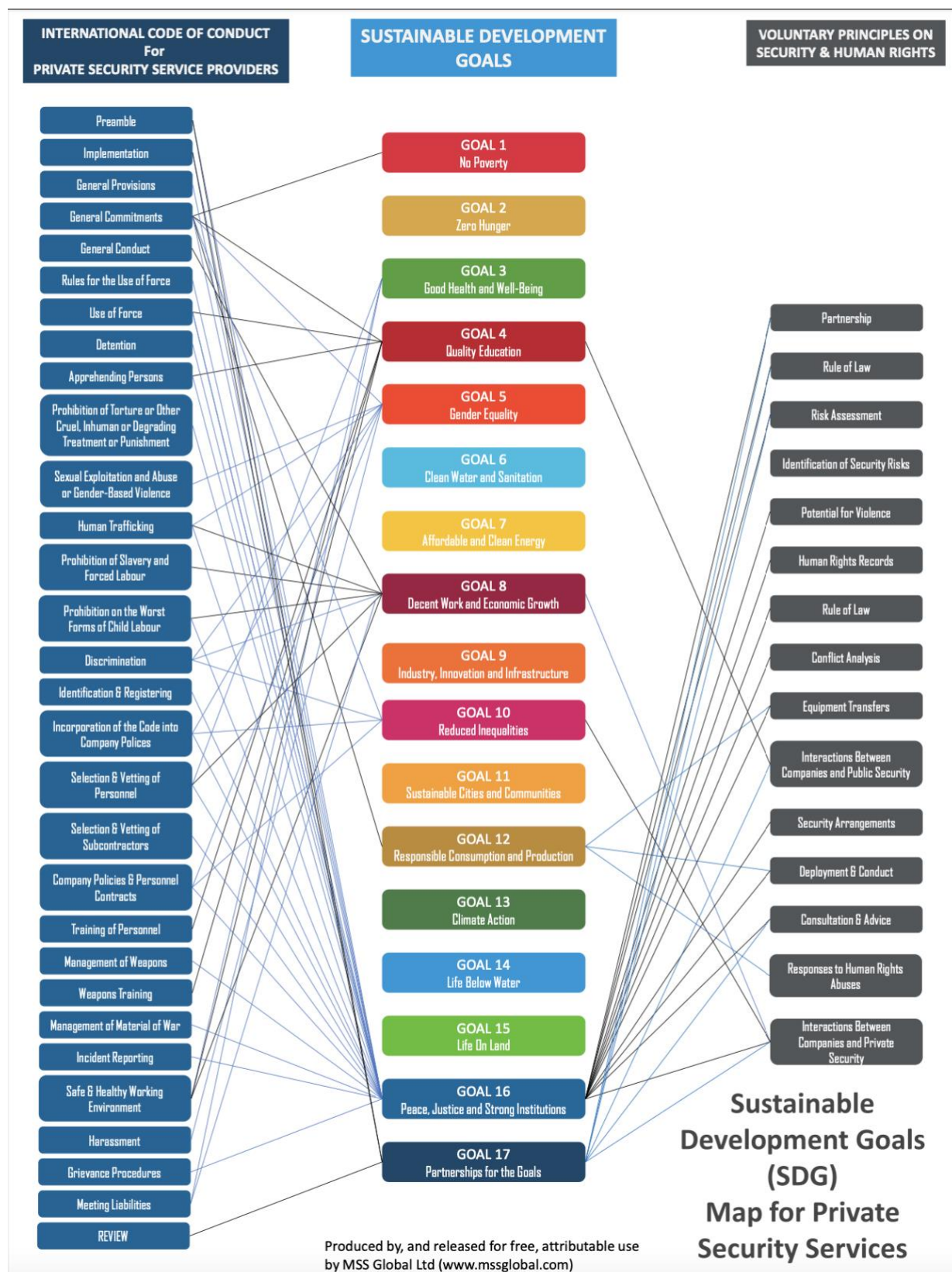
<h2 style="margin: 0;">OBJECTIVE 4.C</h2> <p style="margin: 10px 0 0 20px;">Strengthen the role of Observers in contributing to the realisation of ICoCA's mission.</p>	<ol style="list-style-type: none"> <li style="margin-bottom: 20px;"> <p><b>1.</b></p> <p>Continue to develop partnerships with Observers and potential Observers in order to increase awareness of the importance of ICoCA in raising private security standards and to address their needs and expectations.</p> </li> <li> <p><b>2.</b></p> <p>Increase the opportunities for the Observer Advisory Group to provide advice and guidance to the Association in the implementation of its strategic directions and the accomplishment of its mission.</p> </li> </ol>
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ICoCA developed a number of bi-lateral collaborations with various Observers throughout the period. These collaborations include:

- Partnership with GISF outlined under 3.B to raise awareness on responsible private security contracting in the humanitarian sector;
- Partnership with MSS Global included making their Recognised Progression Suite freely available to Member and Affiliate companies and contributing to the development of MSS Global's mapping of the Sustainable Development Goals with ICoCA and the VPIs (see below);
- Development of insurance guidelines for private security companies by Chesterfield Group;

- Continued collaboration with Philip Morris International including vetting of potential security providers bidding for their global contracts;
- Development of close working relationship with International SOS, which included providing a presentation on ICoCA to their global staff;
- Continuing collaboration with the VPI, including participating in a number of online events throughout the year;
- Continued engagement in China with Dr. Zhanggui Zhou, most recently including on the translation of the PSEA training course into Chinese;
- Collaboration on outreach with International Foundation for Protection Officers, including the launch event for the online training course on Preventing Sexual Exploitation and Abuse;
- Input on the client procurement guide from Henri Knorst;
- Engagement with Small Arms Survey, including input from Echelon International on the Weapons and Ammunition Management project.

We are grateful to all our Observers for their continued engagement, support and willingness to volunteer their advice and expertise to furthering the mission of the Association in raising private security standards.

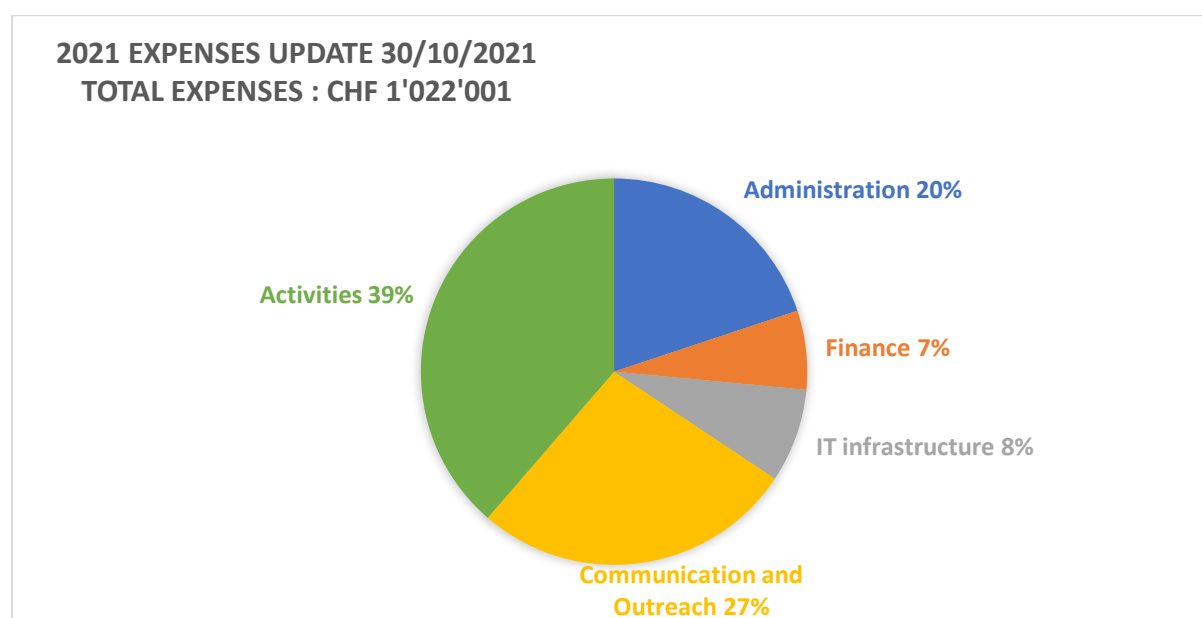


ICoCA Observer MSS Global's SDG Mapping

## 6. Financials

**6.1 Income by source** - During the reporting period, the Association received its financial support from three principal sources: contributions from Member Governments, annual Membership Dues from Industry Members and Affiliates, and one-time joining fees from candidates applying for Industry membership and affiliation. Additional modest revenue has come from Observers' annual fees. As in 2020, the main objective for 2021 was to strengthen the Association's financial structure by diversifying its sources of revenue. Several meetings have been organised with different stakeholders. With the continuation of the COVID-19 pandemic, the Association has had to adapt and reallocate some funds to sustain remote ICoCA activities, and ICoCA visibility. In particular, ICoCA has invested more into its IT infrastructure and website, for example by developing an online training

### 6.2 Expenditures by category -



**6.3 2021 Audited and financial statements** - In accordance with Article 8.1.6 of the Articles of Association, and the applicable Swiss Association Law, ICoCA's finances for the period from January 1, 2020 until December 31, 2020 were audited in March 2021. Berney Associés Audit SA were appointed to perform the audit. A copy of the audit letter and the audited financials is attached as Annex A. The final budget for 2020 was CHF 1'242'845 and the approved budget for 2021 was CHF 1'368'574.

**6.4 2021 and 2022 Budgets** - The ICoCA Board of Directors approved the core budget for 2021 at its Q2 Virtual Meeting in June 2021. The Board of Directors then reviewed the Association's performance against the approved budget on a quarterly basis, and adjusted it as required to navigate the consequences of the COVID-19 pandemic and its impact on the Association's priorities and activities. 2021 updated budget amounts to CHF 1'428'164.

The Board will consider an operating budget for 2022. The 2022 budget is based on projected membership dues revenues as well as target contributions and grants from Member governments and

other funding sources. The 2022 budget has been prepared based on the market conditions created by the current COVID-19 pandemic, its impact on private security companies, and ICoCA ambitions in terms of developing new partnerships and training courses, and resuming field visits.

## **7. Closing Remarks**

This report was submitted for approval to Members of the Association at the Eight Annual General Assembly, on December 6, 2021.