



The
Responsible
Security
Association



GUIDANCE FOR PRIVATE SECURITY COMPANIES ON THE MANAGEMENT OF WEAPONS AND MATERIEL OF WAR

International Code of Conduct for Private Security Service Providers *(2010, as amended 2021)*

Management of Weapons

56. *Member and Affiliate Companies will acquire and maintain authorizations for the possession and use of any weapons and ammunition required by applicable law.*

57. *Member and Affiliate Companies will neither, and will require that their Personnel do not, possess nor use weapons or ammunition which are illegal under any applicable law. Member and Affiliate Companies will not, and will require that their Personnel not, engage in any illegal weapons transfers and will conduct any weapons transactions in accordance with applicable laws and UN Security Council requirements, including sanctions. Weapons and ammunition will not be altered in any way that contravenes applicable national or international law.*

58. *Member and Affiliate Company policies or procedures for management of weapons and ammunitions should include:*

- a)** *secure storage;*
- b)** *controls over their issue;*
- c)** *records regarding to whom and when weapons are issued;*
- d)** *identification and accounting of all ammunition; and*
- e)** *verifiable and proper disposal.*

Management of Materiel of War

60. *Member and Affiliate Companies will, and will require that their Personnel to, acquire and maintain all authorizations for the possession and use of any materiel of war, e.g. hazardous materials and munitions, as required by applicable law.*

61. *Member and Affiliate Companies will neither, and will require that their Personnel will neither, possess nor use any materiel of war, e.g. hazardous materials and munitions, which are illegal under any applicable law. Member and Affiliate Companies will not, and will require that their Personnel not engage in any illegal material transfers and will conduct any materiel of war transactions in accordance with applicable laws and UN Security Council requirements, including sanctions.*

62. *Member and Affiliate Company policies or procedures for management of materiel of war, e.g. hazardous materials and munitions, should include:*

- a)** *secure storage;*
- b)** *controls over their issue;*
- c)** *records regarding to whom and when materials are issued; and*
- d)** *proper disposal procedures.*

GUIDANCE FOR PRIVATE SECURITY COMPANIES ON THE MANAGEMENT OF WEAPONS AND MATERIEL OF WAR

CONTENTS

| | |
|---|-----------|
| BACKGROUND AND GUIDANCE | 6 |
| DEFINITIONS | 8 |
| LEGAL COMPLIANCE | 10 |
| SECURITY | 12 |
| PERSONNEL | 14 |
| EQUIPMENT SERVICEABILITY | 16 |
| SAFETY | 18 |
| INCIDENT REPORTING AND INVESTIGATION | 20 |
| CONCLUSION | 22 |
| ACKNOWLEDGEMENTS | 23 |
| ANNEX A | 24 |

The International Code of Conduct Association (ICoCA)

ICoCA, the Responsible Security Association, is the leading international organisation committed to improving human rights standards in the private security industry. ICoCA's mission is to promote responsible, transparent and accountable private security practices worldwide that respect human rights, international humanitarian law and the rule of law, safeguarding communities through robust oversight, collaboration and capacity building.

The Association serves as the governance and oversight body for the International Code of Conduct for Private Security Service Providers (the "Code"), which articulates the responsibilities of private security companies to raise private security standards, particularly in complex environments. ICoCA's work is grounded in international frameworks, including the UN Guiding Principles on Business and Human Rights, international humanitarian law and the Montreux Document. It supports the 2030 Sustainable Development Goals, particularly Goal 16 (peace, justice and strong institutions) and Goals 5, 8 and 10 (human rights and labour standards).

With a global and diverse membership of governments, civil society organisations, private security providers and their clients, ICoCA mitigates risks associated with poor security practices in global supply chains and environments where abuses may occur.

The Small Arms Survey

The Small Arms Survey is a centre for applied knowledge dedicated to preventing and reducing illicit small arms proliferation and armed violence. The Survey informs policy and practice through a combination of data, evidence-based knowledge, authoritative resources and tools, and tailored expert advice and training, and by bringing together practitioners and policymakers.

The Survey is an associated programme of the Geneva Graduate Institute, located in Switzerland, and has an international staff with expertise in security studies, political science, law, economics, development studies, sociology, criminology, and database and programme management. It collaborates with a network of researchers, practitioners, partner institutions, non-governmental organisations, and governments in more than 50 countries.

The Survey's activities and outputs are made possible through core support as well as project funding. A full list of current donors and projects can be accessed via the Small Arms Survey website: www.smallarmssurvey.org

BACKGROUND AND GUIDANCE

This guidance document, produced by the International Code of Conduct Association (ICoCA) in cooperation with the Small Arms Survey, has been written to support private security companies (PSCs) in the management of their weapons and materiel of war. It applies to items in operational use, awaiting repair or disposal, and those that have been recovered.

The primary purpose of this guidance is to support PSCs in preventing the *diversion*¹ of weapons and materiel of war caused by theft, loss, corruption, misuse and poor accounting. Not only does such diversion risk destabilising the local and national operating environments, but it can also damage the reputations, operational performance and profitability of PSCs. It is therefore in PSCs' own interests to address potential causes of diversion, and within an overall framework of support to the rule of law and respect for human rights.

This guidance is based on the relevant articles in the International Code of Conduct (i.e. [56-58](#); [59](#); [60-62](#)) and expands on the existing management indicators for weapons and materiel of war available on the ICoCA website.² A major component is the aspects related to security, given the inextricable link with diversion. However, other areas, such as legal compliance, safety and equipment serviceability also feature prominently, recognising that they too are key constituents of a comprehensive, rules-based approach to the management of weapons and materiel of war.

The document is intended primarily for the management-level of PSCs, with the focus on how weapons and materiel of war are managed rather than how they are *used*.³ This document will also be of interest to the operator level and to others who are wanting to enhance their own skills and competencies in weapons and materiel of war management. This guidance document also helps private and public sector clients of PSCs to know what aspects of

the management of weapons and materiel of war to focus on before, during and after contract implementation.

As this document is aimed primarily at managerial level staff, it leaves the more technical detail to various authoritative publications like MOSAIC and the IATGs. The MOSAIC⁴ compendium provides granular information on managing small arms, while the IATGs⁵ offer guidance on conventional ammunition, including more hazardous materials of war that certain PSCs may have in their inventories. This guidance should therefore be read in conjunction with the technical publications listed with other resource material at Annex A.

The recommended practices in this guidance document are equally applicable to hazardous and non-hazardous equipment, and to all weapons categories. In the case of some items, of comparatively lower lethality and hazard (e.g. batons, pepper spray, helmets and vests), there might be scope for PSCs to moderate some of the practices described herein. Much will depend though on the prevailing circumstances and compliance with the rule of law and human rights.

A collaborative and respectful management style and work culture can be an important contributor to the effective implementation of this guidance. It helps by leveraging all available skills, talents and abilities to address the challenges associated with weapons and materiel of war management. Hence it is an important thread that runs throughout this document.

1. According to the Small Arms Survey, diversion and loss can be used interchangeably. This document will use the term 'diversion' throughout to refer to the unauthorised change in possession or end use of legally held or transferred weapons, ammunition, parts, or accessories. The term does not implicitly infer culpability or illegality. See: Berman, Eric G., Mihaela Racovita and Matt Schroeder. *Making A Tough Job More Difficult: Loss of Arms and Ammunition in Peace Operations*. (Geneva: Small Arms Survey, 2017), p. 13.

2. <https://icoca.ch/2022/03/30/indicators-on-management-of-weapons-and-ammunition-available/>

3. The latter is an entirely different subject. The use of force by PSCs, including risks and mitigation measures (as in the case of negligent discharges) is outside the scope of this guidance.

4. <https://disarmament.unoda.org/convarms/mosaic/>

5. <https://unsafeguard.org/un-safeguard/guide-lines>



DEFINITIONS

This section provides definitions of the key terms used in this guidance document. Understanding these terms is crucial for application of the practices discussed below. They are consistent with what is mentioned in the related ICoCA indicators, and are mostly derived from existing, definitive publications such as MOSAIC.

Weapons

The term 'weapon' can have many meanings, some of which are extremely broad and imprecise. For the purposes of this document, weapons are defined as:

Portable or vehicle mounted instruments and devices intended to deter and, in extremis, neutralise physical threats to personnel and property.

The types of weapons held by PSCs can range from those with an inherent lethal capability (such as rifles and pistols) to those that have less (although unlikely to be zero) potential of causing fatal injury (such as batons, tasers and pepper spray).⁶

Materiel of war

For the purposes of this document, materiel of war is defined as:

All equipment and supplies, hazardous and non-hazardous, needed for operational activities associated with the actual or potential use of force.

Examples of materiel of war range from small arms ammunition and pyrotechnics, like flares and smoke cannisters, to protective equipment such as body armour, vests and helmets. In theory, weapons could also be included in this term. For this guidance document, the weapons category (including weapons-related equipment⁷) is treated separately to materiel of war.

Management of weapons and materiel of war

For this guidance document, the management of weapons and materiel of war is defined as:

A system of work and an accompanying set of legally compliant practices and procedures to ensure that all weapons and materiel of war held by a PSC are secure, safe and serviceable.⁸

Good Practice

This term is defined as:

Widely accepted, optimal methods and techniques that have been proven through experience and research to consistently achieve desired results. They serve as benchmarks for excellence and efficiency, guiding individuals and organisations to perform tasks effectively and efficiently.

6. Commonly referred to as 'less lethal' weapons.

7. Items directly associated with weapons, including those that may not themselves have a lethal capability but still constitute a critical or vital part of a weapon system. Some examples are magazines; ammunition belts; optics; aiming devices; guidance components; platforms; mounts; pods; muzzle attachments; spare parts (electrical and/or mechanical).

8. This definition has been adapted from the ICoCA Indicators on Management of War, available at www.icoca.ch.





LEGAL COMPLIANCE

Rationale

Most PSCs operate in countries where there is domestic legislation governing the nature and extent of the services they are permitted to provide. National permits and/or licenses are normally required for the carrying of arms and for the possession and storage of certain items of materiel of war. Security and training standards for PSCs and staff are also embedded within the laws and regulations of many countries. Similar restrictions can apply to weapons transfers and transactions.

These provisions often reflect international legal commitments (such as the [Arms Trade Treaty](#), the [Firearms Protocol](#), and UN sanctions regimes) or political commitments (such as the UN [Programme of Action on small arms and light weapons](#) and the UN Global Framework for [Through-life Conventional Ammunition management](#)). Such instruments, many

of which are complemented by regional frameworks, seek to prevent: illicit trafficking; diversion to illicit end-users; violations of international humanitarian or human rights law—all of which can put at risk the staff, clients and operations of PSCs. Much of this is enshrined within the International Code of Conduct.

Awareness and implementation of the relevant, applicable national laws and international instruments is the responsibility of individual PSCs. Failure to do so can have significant legal and financial implications. In practice, this means that PSCs need to inform themselves of the local and national legislation and procedures for possessing, storing, handling and transferring weapons and materiel of war. They also need to be aware of any legal responsibilities they have for the actions of their suppliers and sub-contractors.



Challenges

Remaining abreast and compliant with the latest developments and changes in local and national legislation can be resource intensive. Arguably this is becoming even more so because of the pace of technological change and the corresponding need to create or adjust regulations, and the trend towards increasingly elaborate statutory obligations on weapons and materiel of war management. At the local and national level, there is the challenge for some PSCs of navigating complex or uncertain authorisation processes. Obtaining and renewing permits and licenses can often be both arduous and time-consuming.

Responses

It is important for PSCs, regardless of size, to remain aligned to local and national laws and regulations as they evolve. PSCs need to pay particular attention to the rules governing the acquisition of weapons and materiel

of war, their transfer, and their disposal. Attention also needs to be paid to the legal and regulatory requirements that authorise staff to possess and handle weapons and materiel of war in their work. To assist PSCs in this task, the following good practices should be considered:

- Conduct periodic reviews to ensure compliance with all relevant local and national laws and regulations. Consider whether these are likely to change due to recent or proposed changes in regional and international instruments.
- Provide ongoing training for staff on legal and ethical requirements as well as good practices for managing weapons and materiel of war.
- Keep a detailed log of permits and licenses to ensure that all are up-to-date and renewed on time.
- Maintain open lines of communication with local and national authorities to stay informed about any changes in legal requirements, national and international standards and good practices.

SECURITY

Rationale

There is a clear, unequivocal obligation on the part of PSCs to ensure that the weapons and materiel of war that are in their possession and/or ownership are kept secure at all times. Failure to do this can lead to these items falling into the wrong hands, with untold consequences for the maintenance of law and order and stability. For PSCs, this carries the added risks of reputational damage, the potential loss of contracts, litigation and a haemorrhaging in staff morale and numbers.

The International Code of Conduct stresses that member and affiliate PSCs should ensure that weapons and ammunition are securely stored⁹ and that there are controls over their issue including records on when and to whom these items are issued.¹⁰

Challenges

Ensuring that weapons and materiel of war are secure at all times, regardless of the situation and circumstance, is a significant challenge and one that cannot be underestimated by PSCs and clients. At storage sites, there are many issues and problems that can arise, from unforeseen staff absences, power cuts, loss of keys, severe storms and equipment malfunction. At the individual level, there are risks of non-compliance with the company's procedures, including the potential for disciplinary issues or even corruption. At the company level, the requirement for robust, 24/7 security can be problematic when there are competing pressures on time and resources, and where management's situational awareness is lacking. This can be especially problematic when there are layers of management between those who secure and service the equipment and those who make decisions on allocating resources.

Responses

Only by placing security at the front and centre of their priorities can PSCs create and maintain an operating environment which is conducive with preventing diversion of weapons and materiel of war. PSCs need to allocate

sufficient funds to the full spectrum of measures from staff training to robust storage facilities. They also need to implement rigorous monitoring systems and to develop across the workforce a culture of 'continuous improvement'. Some specific good practices are listed below:

Inventory Management

- Limit holdings to the necessary quantities to prevent excess and the increased risk of diversion.
- For ease of accounting, keep unused ammunition sealed in its parent packaging and store spare weapons in sealed logistical storage boxes.
- Create standardised documentation for all weapons and materiel of war transactions and transfers.
- Keep detailed ledgers with all relevant information (e.g. weapon and ammunition holdings, country of manufacture, supplier details, serial or lot/batch number, calibre, type, quantity, storage location). Avoid having duplicate ledgers.
- Keep detailed, up-to-date records on weapons and materiel of war issued to PSC staff.
- Where possible, introduce digitised processes for maintaining accurate inventory records and traceability.
- Perform regular checks and audits at all locations:
 - **Daily:** cross-check all weapons in-store and issued against those listed in the overall ledger.
 - **Weekly:**
 - 100% physical stock check of weapons, by quantity, type, serial and butt number.
 - 100% physical stock check of ammunition, by quantity, type, serial/batch/lot number. (Note: sealed consignments need not be opened but the quantities should be noted, and the markings checked along with the integrity of the packaging).

⁹ Secure storage refers to the methods and practices employed to ensure that weapons and materiel of war are kept safe from unauthorised access and diversion caused by theft, loss, corruption, misuse and poor accounting. Key elements include, physical security, access control, inventory management, and legal compliance.

¹⁰ International Code of Conduct, para. 58(a), (b) and (c), 62 (a), (b) and (c).

- **Three-monthly:** apply the weekly check procedure, plus a 100% stock check of all materiel of war items. This should be conducted by senior managers/supervisors with no direct responsibility for weapons and ammunition management.
- **Following changes of armourer/key holder:** apply the three-monthly check procedure.
- Record the date and name of the person conducting each check and keep this for at least 10 years.
- Enforce strict sanctions if record-keeping and the weapons and materiel of war supervision does not adhere to company policies.

Oversight

- Ensure each storage site has two-layers of security. For example, weapons should be kept in a secure armoury or office which, in turn, is equipped with lockable racks or boxes.
- All locks and padlocks used in securing weapons and ammunition should be of an internationally recognised grade.
- Confirm the existence at each storage site of a robust system for secure custody of access keys.
- Always verify deliveries with proper receipts, and with checks conducted by at least two individuals.
- Conduct inspections of storage sites and records by qualified staff with no direct responsibility for those sites or procedures.

Responsibilities

- Ensure that job descriptions specify the tasks required of each individual staff member with regard to the security of weapons and materiel of war. This should include senior managers and directors.
- Provide targeted training so that staff at each level understand actual and potential diversion risks, and what their role is in the mitigation. This training should emphasise the need to always retain rather than share personal weapons once they have been issued, and to avoid storing them and rounds of ammunition at home.
- Establish comprehensive protocols for the handover of responsibilities and holdings between armourers/ other weapons technicians, avoiding frequent changes and absence of signatures.

Losses and Recoveries

- Ensure that all staff (but especially managers) are trained in, and have access to, standard operating procedures (SOPs) on what to do in the case of loss of weapons and materiel of war.
- Foster a culture where losses are reported promptly.
- Consider implementing an 'amnesty system' to allow employees to return unaccounted-for material without fear of sanction.
- Establish a systematic process covering the handling of all items that are recovered, including reception arrangements, documentation, transfer and storage.
- Serialise all hazardous recovered items and treat them as sensitive equipment.¹¹



¹¹ The term 'sensitive equipment' refers to individual assets that are controlled inventory items requiring special management and handling due to potential security issues if lost, stolen or misused. (Each asset is assigned a unique identification number, enabling precise tracking to enhance visibility, financial accountability, and to support safe, secure and serviceable management throughout the lifecycle).

PERSONNEL

Rationale

The International Code of Conduct considers personnel as any “persons working for a PSC, whether as employees or under a contract, including its staff, managers and directors”, which includes independent contractors, temporary workers and paid or unpaid interns.¹² As is the case with most businesses, the success of a PSC depends on its personnel. If they are well selected, trained, developed and managed, there is a good chance that the company will perform to, and even exceed expectations. This is even more the case for those staff like armourers and Information Technology/Information Management (IT/IM) experts directly involved in the management of weapons and materiel of war. Their work is vital to the safe and effective operation of the organisation. Investing in them, from providing the necessary equipment, resources and training to creating a working environment conducive to attracting and retaining quality personnel, is a key determinant of commercial success.

Challenges

Some PSCs encounter major difficulties in hiring and retaining staff, particularly specialists like weapons technicians and IT/IM experts. In highly competitive job markets, the salary expectations for specialists can exceed what many PSCs are willing to offer. In addition, qualified individuals can come from diverse backgrounds and may reject PSCs that do not have policies in place to prevent discrimination, support work-life balance (including for parents), and foster an inclusive work culture.

As a result, many PSCs resort to double-hatting, whereby existing staff are asked to take on additional roles as armourers, or the same IT staff manage multiple data bases, ledgers and records. The major problem with this arrangement, however, is that these are becoming increasingly complex and time-consuming tasks, requiring the full-time attention of qualified experts.

Responses

A good way of overcoming staff shortages is for PSCs to invest heavily in upskilling their staff. This can be through training, taking advantage of an increasing

number of on-line training packages. It can also be through career development, offering opportunities for career advancement in specialist fields like weapons and ammunition management, and IT/IM. Accompanying this should be efforts to widen the recruiting base by offering employment packages that appeal to talented individuals from diverse personal and professional backgrounds. Likewise, incentives that speak to the needs and interests of staff members, like flexible working conditions, would help to retain existing personnel. Whilst these initiatives can be costly, the outlay would soon be recuperated through the greater retention of a more qualified work force.

Mentioned below are some specific ways in which PSCs can develop and grow their own pool of suitable weapons and materiel of war specialists – and other parts of the workforce:

Recruitment

- Ensure that recruitment processes encourage candidates from a wide variety of personal and professional backgrounds to apply.
- Use diverse recruitment panels (e.g. including both women and men), implement measures such as anonymous written tests to eliminate bias, and ensure that staff are recruited based on their competency, suitability and potential to do the job.
- Implement a thorough vetting process, undertaken by qualified individuals to ensure personnel are suitable for access to weapons and materiel of war. This can include:¹³
 - Only hiring individuals with the requisite qualifications.
 - Not hiring anyone under the age of 18 years for security-related duties.
 - Checking that applicants have not been:
 - Convicted of a crime¹⁴ that would indicate that the individual lacks the character and fitness for the specified role;

¹² International Code of Conduct, B. Definitions, 'Personnel'.

¹³ Drawn from paragraphs 45-49 of the International Code of Conduct.

¹⁴ e.g. battery, murder, arson, fraud, rape, sexual abuse, organized crime, bribery, corruption, perjury, torture, kidnapping, drug trafficking or trafficking in persons; see paragraph 48 of the International Code of Conduct.

- Dishonourably discharged from the armed forces;
 - Dismissed by a previous employer/contractor for actions incompatible with the principles of the International Code of Conduct;
 - Involved in other forms of conduct that, according to an objectively reasonable standard, brings into question a person's fitness to carry a weapon.
- Take full advantage of the increasing range and number of on-line training courses.
 - Use briefings to enhance knowledge and understanding, and use practical, hands-on exercises to develop skills.
 - Introduce a mechanism for feedback from course students and use incentives to promote an interest in training and education.

- Regularly evaluating employees to ensure that they meet appropriate physical and mental fitness standards to perform their contracted duties.

- Ensure that the findings of each vetting process are fully recorded, and the documents are secured and retained for at least seven years.¹⁵
- Perform due diligence checks¹⁶ on the selection of sub-contractors, including any history of weapons and ammunition losses. Maintain oversight of their performance and consider formal compliance agreements to ensure delivery in accordance with the International Code of Conduct.

Training and Personal Development

- Develop career progression frameworks for the competencies of weapons and materiel of war management and for IT/IM managers.
- Use train-the-trainer programmes to establish a cadre of qualified instructors in weapons and materiel of war management, and in IT/IM.
- Establish an annual training calendar to include initial training, refresher training and upgrading/promotion courses.
- Create and regularly inspect individuals' training records.
- Train armourers and others responsible for managing weapons and materiel of war on the interpreting, recording and checking of weapons and ammunition identification markings.¹⁷

Retention

- Ensure that managers understand the contribution that staff working in weapons and materiel of war management make to the PSC's core business.
- Implement staff satisfaction surveys and implement measures to encourage specialised staff working in technical roles to stay with the company by providing them with a rewarding and inclusive working environment.
- Include questions on discrimination and gender equality in staff satisfaction surveys to assess whether all staff perceive that they have equal opportunities, including to work in specialised technical roles.
- Explore ways to provide flexible working conditions, particularly for those with trades and skills that are hard to replace.
- Implement company policies to protect mental health that include awareness raising and training on how to identify signs of conditions such as substance abuse, excessive alcohol use and PTSD.
- Provide awareness and intervention training together with robust grievance, whistleblowing and related reporting procedures to address claims of failure to adhere to the principles of the International Code of Conduct.¹⁸

¹⁵. Paragraph 53 of the International Code of Conduct.

¹⁶. See paragraphs 50 & 51 of the International Code of Conduct.

¹⁷. Staff with responsibility for ammunition storage must be aware of the meaning of the six explosive hazard classification signs.

¹⁸. See the International Code of Conduct, paragraphs 66-68.



EQUIPMENT SERVICEABILITY

Rationale

It is essential that a PSC's weapons and materiel of war are fit for purpose. Failure to perform as required can impact on individual and collective safety, security and the achievement of assigned tasks. A comprehensive system of monitoring, maintenance and repair helps ensure that these items are available as and when needed and function appropriately.

Financially, it is also in the interest of PSCs to prolong the life of their equipment by avoiding wastage through inadequate maintenance and unsatisfactory storage arrangements. In addition, the timely, efficient and effective disposal of items at the end of their shelf life mitigates the hazards to staff and prevents rejected items from falling into unauthorised hands. Appropriate disposal¹⁹ procedures minimise corporate liability risks and demonstrate a PSC's commitment to environmental protection. As stated in the International Code of Conduct, there is a need for "verifiable and proper disposal"²⁰.

Challenges

Ensuring the serviceability of weapons and materiel of war can present a variety of challenges. Beyond regular wear-and-tear and the fact that weapons and materiel of war have a limited shelf-life, environmental factors like climate and terrain can accelerate deterioration and damage. This is especially the case where funding for proper storage arrangements is inadequate. A lack of knowledge on surveillance and maintenance techniques can compound these problems.

Responses

Responding to these challenges is best done through PSCs having a proper system for caring and checking on their weapons and materiel of war. Inculcating into the minds of staff the importance of equipment care can go a long way to minimising waste and avoiding malfunction. This of course needs to be complemented with the allocation of sufficient resources for proper storage facilities and for systematic monitoring and maintenance by trained personnel.

¹⁹ For PSCs, the disposal of weapons and hazardous materiel of war (including ammunition) can involve their transfer to national authorities; their sale in line with extant local and national laws and aligned to international good practices; their destruction or neutralisation. Destruction refers to the complete and irreversible elimination of an item, making it unusable and irreparable, while neutralisation is rendering it harmless or inert without complete destruction, and must be done in line with good practices to avoid safety issues or the risk of reactivation. Disposal by destruction or neutralisation must comply with all applicable local and national laws and regulations to ensure safety and legality.

²⁰ See the International Code of Conduct, paragraph 58e.

What follows are some suggested ways in which PSCs can maximise the serviceability of their weapons and materiel of war:

In-use

- Establish a comprehensive system for the proper storage, maintenance and repair of weapons and materiel of war, staffed with appropriately trained personnel and supported by adequate budgets.
- Encourage all staff to report faults and damage.
- Keep a controlled ledger for at least 20 years for weapons and 10 years for ammunition, that is regularly reviewed by senior management. It should detail:
 - All maintenance checks, repairs, alterations and modifications.
 - Any faults or damage reported by users.
- Limit in-house repairs of weapons to minor armourer tasks, such as part replacements, while prohibiting in-house repair and/or refurbishment of hazardous materiel of war.
- Control any alterations or modifications to ensure that they comply with legal and safety standards.²¹
- Monitor the recommendations issued by relevant manufacturers and suppliers of the company's weapons and materiel of war and ensure and record compliance.
- Ensure that the system includes procedures for returning weapons and materiel of war in need of significant repair to the manufacturer or earmark them for destruction if beyond repair.
- Ensure that all weapons and materiel of war awaiting repair or disposal are appropriately marked, recorded and stored in a segregated area to prevent mix-up with serviceable items.



Disposal and Destruction

- Develop and implement comprehensive disposal procedures, tailored to legal and regulatory requirements, and enforce their implementation.
- When ammunition is obsolete or no longer needed, rapidly identify the most appropriate disposal option. This can be: transferring the items to the national authorities; sale; destruction; neutralisation.
- Work closely with the national authorities to ensure all disposal procedures are lawful (e.g. the proposed deactivation of weapons or ammunition neutralisation is permitted and in line with current laws and regulations).
- Only choose destruction methods²² that guarantee the complete and irreversible elimination of an item, making it unusable and irreparable. Securely dispose of any scrap.
- Maintain accurate records, including photographs of before, during and after the items have been destroyed, capturing all markings.
- Update applicable ledgers and retain the records for at least 20 years for weapons and 10 years for ammunition.

²¹. This includes physical changes to ammunition that modify or remove lot, batch, serial numbers, or any other markings intended to facilitate tracing. It also refers to alterations to the serial number, calibre, timing, and shooting mode of weapons or any effort to convert blank firing weapons to fire any type of live ammunition as well as the reactivation of deactivated weapons.

²². Potential methods for weapon destruction include burning; cementing; crushing; cutting by bandsaw, hydraulic shears, hydro-abrasive technology, rotating disc, oxy-acetylene or plasma torch; detonation; shredding; smelting. For ammunition, the following can be considered (although less environmentally damaging options are preferable): open-burning, controlled detonation.



SAFETY

Although safety has been referred to on several occasions in this document, this section elaborates further on some important aspects such as safety practices for ammunition.

Rationale

In addition to any contractual and legal requirements, PSCs always have a moral responsibility to provide a safe working environment, with the risks to staff reduced to the greatest extent possible. The International Code of Conduct refers to the need to provide a safe and healthy working environment.²³ Safety considerations need to feature prominently in PSCs' thinking and planning, particularly given the hazardous nature of some of the work. Unsafe ammunition presents a threat to own staff and to everyone (including the civilian population) within the danger zone.

Inadequate mitigation measures can result in legal action by authorities and individuals, leading to financial penalties imposed on PSCs and even the loss of operating

licences and contracts. It is therefore in PSCs' best interests to devote sufficient time and effort to this aspect of the operation.

Challenges

PSCs that work with hazardous material require staff with detailed, technical knowledge of items' performance characteristics, the prevailing risks and safe handling procedures. These staff need to be provided with regular training by qualified experts, particularly as safety rules and techniques are constantly being reviewed.

Establishing and maintaining this in-house safety capability and awareness can be a challenge for some PSCs due to staff turnover, the specialist nature of the training material and the associated costs.

²³. International Code of Conduct, paragraph 64.

Responses

Adopting a 'safety first' approach to the conduct of business, particularly the management of weapons and materiel of war, is the best way for a PSC to protect the interests of its staff, local communities and those of the company. The following are illustrations of how a safety-first approach, particularly in the munitions area, can be created:

- Use ammunition types that are the least hazardous and avoid ordering more than is operationally essential.
- Implement stock rotation, expending older stocks before moving onto newer supplies.
- Weapons and ammunition not in ready use should be stored separately.
- Store detonators in a separate place to other munitions. Likewise, keep damaged items, pyrotechnics, propellants and high explosives in segregated areas.
- To prevent mix-ups, store blank and live ammunition separately, and clearly label them as such.
- Ammunition should be kept in clean, dry areas and out of the sun.
- In hot, humid conditions ensure there is adequate ventilation.
- Where possible, site any hazardous material away from population centres and not in close proximity to radio transmitters.
- Devise and regularly test all fire-fighting/fire-prevention drills and SOPs and ensure a sufficiency of serviceable fire-fighting equipment. (Importantly, ensure a supply of local water at each storage site.)
- Ensure staff are trained in first-aid drills to deal with any weapons and ammunition incident.
- Prohibit smoking within proximity to hazardous material and remove all combustible items like empty wooden boxes from those areas.





INCIDENT REPORTING AND INVESTIGATION

Rationale

Incident reporting and investigation forms a critical component of a functioning and effective weapons and materiel of war management system.²⁴ Without it, issues such as faulty equipment and user errors, as well as failures in processes, procedures, and practices, may go unnoticed and uncorrected. In the case of PSCs, this can then lead to reduced safety, efficiency and profitability. In some situations, it can pose a risk to regulatory compliance—and even to life. The importance of incident reporting is stressed in paragraph 63 of the International Code of Conduct.

Companies can demonstrate their professionalism by adopting rigorous, formal systems for incident reporting and investigation, which can help to instil trust and confidence from the authorities and clients.

Challenges

Implementing and maintaining a formal system of incident reporting and investigation involves the training of staff, creating SOPs, maintaining records, conducting interviews, producing the findings and confirming whether the recommended corrective action has been taken. While this is resource intensive, informal and less costly approaches run the risk of similar incidents repeating themselves, which can impact the company's reputation, client base and authorisation to operate.

Moreover, as in all professions, staff are sometimes hesitant to report incidents due to potential negative consequences for themselves and their colleagues. This issue takes time and energy to overcome.

²⁴ Examples of incidents with a weapons/materiel of war connection are: loss; theft; unplanned initiations; breech explosions; occurrence of fatalities/injuries/major damage; (major equipment damage; environmental contamination.



Responses

Treating incident reporting and investigations as a 'whole of business' activity, rather than the work of a few, offers a route to overcoming some of the inherent challenges. Wider participation spreads the workload. It also provides for greater transparency, more diverse perspectives and greater buy-in from staff. This can encourage them to report future incidents.

The following are key points to incorporate in a formalised system of incident reporting and investigation:

- Set-up and publicise confidential communication channels for the reporting of incident-related information by staff at all levels and affected communities.
- Ensure a timely response to all incidents so that vital evidence is not lost.
- Initial reporting should be clear and concise and should be geared to informing decisions on the need, or not, for a formal investigation by the company or by national authorities.
- Produce SOPs on the processes, procedures and staff tasks for reporting and investigating weapons/materiel of war-related incidents.
- Provide regular training for staff on these SOPs, including on the safe handling and preservation of evidence.
- The person heading the formal investigation should be of sufficient seniority and have had no prior involvement in the incident.
- Ensure that diverse teams conduct the investigations (i.e. in terms of gender, expertise and, if appropriate, a balance of national and international staff) to fully understand the impacts and root causes of incidents.
- A report should be produced in writing for the company's use and shared with the client and, where applicable, with national and local competent authorities. It should cover:²⁵
 - The time and location of the incident.
 - Identities and nationalities of persons involved, including their addresses and other contact details.
 - Injuries or damage sustained.
 - Circumstances leading up to the incident.
 - Any measures taken by the Company in response to the incident.
- Include provisions for the follow-up by senior management on the findings of the investigation to ensure that all recommendations have been implemented.

²⁵. See paragraph 63 of the International Code of Conduct.



CONCLUSION

This guidance provides PSCs with the necessary information to establish and retain proficiency in the management of weapons and materiel of war. It will also be of benefit to the clients of PSCs in their supervision of contracts. Whilst the contents are judged sufficient for the needs of most PSCs, the accompanying resources annex will help guide those seeking additional information.

ICoCA welcomes feedback on this document, with a view to incorporating relevant aspects in the next iteration.

Acknowledgments

ICoCA and the Small Arms Survey wish to express their sincere thanks to the United Kingdom's Foreign, Commonwealth and Development Office for its generous support in funding the writing and production of this guidance document. They also wish to convey their thanks to the various PSCs who kindly gave up their time to review the draft document. Their constructive comments were extremely useful in finalising this guidance.

ANNEX A

Resources

General

- **The International Code of Conduct for Private Security Service Providers, the Code - ICoCA - International Code of Conduct Association December 2021:** ICoCA requirements on management of weapons, weapons training, management of materiel of war and incident reporting. <https://icoca.ch/the-code/>
- **ANSI/ASIS PSC1 Management System for Quality of PSC Operations:** information on selection, background screening and vetting of personnel and sub-contractors; competence, training and awareness; performance; incident management, monitoring, reporting and investigation; procurement and management of weapons, hazardous materials and munitions. https://www.acq.osd.mil/asds/log/docs/policy/ANSI-ASIS_PSC.1-2022_Standard%20Feb_2023.pdf
- **ISO 18788 Management System for Private Security Operations:** information on weapons authorisations; procurement and management of weapons, hazardous materials and munitions; incident monitoring, reporting and investigations. <https://www.iso.org/standard/63380.html>
- **The Arms Trade Treaty (ATT):** information on arms export and export assessment, import, transit or transshipment, brokering, diversion and record keeping. <https://thearmstradetreaty.org/>
- **ITI (International Instrument to enable States to Identify and Trace, in a timely and reliable manner, Illicit Small Arms and Light Weapons):** information on the marking, recording and tracing of weapons. <https://front.un-arm.org/wp-content/uploads/2021/03/International-Tracing-Instrument-six-official-languages.pdf>
- **Firearms Protocol (Protocol against the illicit manufacturing of and trafficking in firearms, their parts and components and ammunition, supplementing the United Nations convention against transnational organized crime):** information on criminalisation; confiscation, seizure and disposal; record-keeping; marking of firearms; deactivation of firearms; requirements for export, import and transit licensing or authorisation systems; security and preventative measures; brokers and brokering. https://treaties.un.org/doc/source/RecentTexts/18-12_c_E.pdf
- **A Guide to the UN Small Arms Process: 2016 Update | Small Arms Survey:** concise manual to assist and inform policymakers new to small arms on the international agenda. Covers definitions and terminology, a brief history of the small arms process, summaries of key issues, instruments and measures; and an overview of the roles of various institutions. <https://www.smallarmssurvey.org/sites/default/files/resources/UNSAF%20TEXT%20WEB.pdf>
- **The Montreux Document and the International Code of Conduct – Understanding the relationship between international initiatives to regulate the global private security industry:** paper produced by DCAF in 2016 providing a detailed comparison between good practices contained in the Montreux Document and the principles of the Code, examining to what extent states may build on the Code and its Association in order to regulate the provision of private security services effectively and thereby implement good practices identified in the Montreux Document. <https://www.dcaf.ch/montreux-document-and-international-code-conduct-understanding-relationship-between-international>

Munitions Management and Safety

- **IATGs (International Ammunition Technical Guidelines):** covering ammunition management principles, risk management, accounting, storage facilities, infrastructure, equipment and operations, surveillance, transport, security, destruction, accident reporting and investigations. <https://unsafeguard.org/>
- **A Practical Guide to Life-cycle Management of Ammunition | Small Arms Survey:** introduction to the Small Arms Survey's LCMA model describing the role of national ownership in creating an enabling environment in which states can establish and maintain this system. <https://www.smallarmssurvey.org/resource/practical-guide-life-cycle-management-ammunition>

Weapons Management and Safety

- **MOSAIC (Modular Small Arms Implementation Compendium):** information on SALW international transfer, end-use and end-user controls; civilian access to SALW (MOSAIC 03.30:2015 Section 13 – regulating PSC); stockpile management: weapons; marking and recording; destruction. <https://disarmament.unoda.org/convarms/mosaic/>

Gender Perspectives

- **Gender and Private Security Regulation Policy Brief:** DCAF Policy Brief – Gender and Private Security Regulation. <https://www.dcaf.ch/gender-and-private-security-regulation>
- **A Critical Intersection: Private Security Companies, Gender-based Violence, and the Arms Trade:** Small Arms Survey blog on the role of private security companies in preventing gender-based violence. <https://www.smallarmssurvey.org/resource/critical-intersection-private-security-companies-gender-based-violence-and-arms-trade>

Counter Diversion

- **Diversion - Certificate (smallarmssurvey.org):** Infographic series on possible measures to prevent and address diversion: supporting effective ATT implementation. <https://www.smallarmssurvey.org/sites/default/files/2021-09/Diversion%20infographic.pdf>

Training

- **Instructional Designer's Handbook – Simple Book Publishing (Penn State):** compilation of presentations, readings, research and good practices to assist in designing a course of instruction. <https://psu.pb.unizin.org/idhandbook/front-matter/introduction/>
- **UNODC Systematic Approach to Training:** nine-page overview from UNODC on the systematic approach to training models. https://www.unodc.org/pdf/india/publications/guide_for_Trainers/03_systematicapproachtotraining.pdf





The
Responsible
Security
Association

**International Code of
Conduct Association**

Geneva, Switzerland
secretariat@icoca.ch
www.icoca.ch