

Comments on the Draft ICoCA Recognition Statement for ISO 18788:2015 (November 2016)

According to the [ICoCA Certification Procedure](#), approved by the General Assembly in 2015, the Board can assess and recognize standards that are consistent with the Code. In this context, the Board has undertaken to review the standard ISO 18788:2015 with a view to recognize it. The Board has analyzed the gaps between the standard and the Code (reflected in Annex A of the Draft Recognition Statement) and identified additional information (reflected in Annex B of the Draft Recognition Statement). The Draft Recognition Statement was subsequently circulated to all observers and members on November 1st, 2016.

Members and observers had the opportunity to comment the Draft Recognition Statement until November 20th, 2016. The Secretariat has now compiled all comments received and will review them with the Board, who will give them full consideration and will vote on whether or not to accept the standard and publish a Recognition Statement for ISO 18788. A guidance for companies seeking ICoCA Certification will be subsequently issued.

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Dr. Rebecca DeWinter-Schmitt, Senior Managing Director, Human Analytics (16 November 2016)

Could you please clarify point 3 in Annex B which states: "Provide your Nonconformance Report and Client/Auditee Action Plan." The terminology is confusing. Isn't the Nonconformance Report issued by the Certification Body, so how can the company "improve" that with the assistance of the Association? Also is the Client/Auditee Action Plan, the corrective action plan that the company is supposed to develop in response to non-conformances?

Mr. Sakari Wallinmaa, Strategic Advisor, Frontline Responses Finland (18 November 2016)

I looked into the relevant Annex B of the ISO 18788 ICoCA Recognition Statement: could you please clarify what is a Client/Auditee Action Plan (Point 3), which is mentioned in connection with a Nonconformance Report?

Mr. Tony Chattin, Director, MSS Global (18 November 2016)

The overarching observation is that in general we would expect any competent auditor to explore and look for the evidence as a normal part of the audit already, prompted by the main conformance requirements of 18788. So certification to 18788, by an IAF MLA accredited CB should be sufficient to remove concern for the majority of these 'gaps'.

Annex A:

- In 1.2 *"Does the standard require a company to have a process to consider the potential impact of UN Security Council Sanctions on contracts with governments and their agents?"*
 - *"The requirement for the Company to consider the potential impact of UN Sanctions on contracts with governments and their agents could therefore be stronger."*
 - Also in Clause A.8.2.2.j) "Identity verification should include verification of the validity of personal history and minimum age of the prospective employee.

Personal history, validated by personal history searches when available, should consider.... j) government and industry sanctions lists (...)"

- In 1.3 *"Does the standard require a reporting program whereby known or reasonably suspected national or international crimes must be reported to either the country of nationality of the victim, country of nationality of the perpetrator, or country where the act took place?"*
 - Clauses 8.1.4 & 8.8.3 should also be taken into account: each specifically includes "violations of international, national and local laws or human rights" and "(f) communications with appropriate authorities."
- In 1.4 *"Does the standard require the company to have a process to ensure that it does not enter into contracts where performance would directly and materially conflict with the Code; applicable national or international law; applicable local, regional and international human rights law."*
 - *"(...) the Standard mentions that the Company's management systems, operations and objectives should be consistent with the Code, applicable national or international law, as well as applicable local, regional and international human rights law. However, the Standard does not contain a specific prohibition against entering a contract where performance would conflict with the Code or any applicable law."*
 - Clause 4.4 states that "the SOMS shall implement the principles and commitments of the ICoC." The use of the word 'shall' is a directed task; a PSC cannot use discretion to ignore. It is therefore intrinsic that they cannot enter a contract where performance would conflict with the Code. Suggest removing this 'GREEN'.
- In 1.4 *"Does the standard require a process to review contracts and ensure there is no conflict with the Code?"*
 - *"However, it does not specifically require a process to review contracts and ensure there is no conflict with the Code."*
 - Please see clause 4.2 "Top management shall ensure that internal and external stakeholder interests are identified, evaluated and documented, in order to achieve the objectives of its contracts and minimize risks." The Code and Association are key external stakeholders. Sub clauses c) & d) state: "When identifying internal and external stakeholder needs and requirements, the organization shall consider its: c) legal and regulatory requirements and voluntary commitments; d) human rights responsibilities and impacts relevant to the services provided." Meeting these requirements is considered to provide appropriate process control.
- In 2.1 *"Does the standard require that the vetting process applies to both to new hires and promotions to new positions?"*
 - *"However, the Standard does not speak about the frequency with which background vetting and screening processes and performance review should be carried out, nor to specific occasions necessitating them (...)."*
 - We would suggest that maintaining qualifications, annual performance reviews etc. and pre-employment screening should be a high enough bar. Even in US Government contracting, where US government security clearances are required, background screening is only done once every 5-7 years. An employer can always conduct enhanced screening "for cause," but monitoring performance "on the job" is a reasonable standard. Screening is risk based, hence the caveat in 8.6.2.2 "Personnel shall be required to notify the organization of any change of circumstances that might lead to a review of their screening status." This is therefore the trigger sought by the author of the GA. This is then married to A.8.6.2.2 "The organization should

establish, document, implement and maintain procedures that screen out personnel who do not meet minimum qualifications established for positions,” which provides the ongoing management control, in concert with “The screening and vetting process should be based on the nature of the job for which the candidate is being considered, the person’s level of authority and the area of specialization.” It is then verified through 7.5.2.2(c) – Records.

- In 2.1 *“Does the standard require that company personnel agree to participate in internal and external investigations and disciplinary procedures?”*
 - *“However, the Standard does not require an explicit agreement from the Company’s personnel to participate in internal and external investigations.”*
 - Does this not risk someone being directed to support an investigation which could potentially lead to them implicating themselves? It could be written into an employment contract as long as it was supported with the caveat that an employee always has the right to seek counsel. Actions the company can take if an individual does not cooperate will normally be governed by national employment law.
- In 2.1 *“Does the standard require that the company’s anti-discrimination policy apply to race, colour, sex, religion, social origin, social status, indigenous status, disability, or sexual orientation when hiring personnel and selecting personnel on the basis of inherent requirements of the contract?”*
 - *“However, the Standard does not contain explicit requirements with regards to anti-discrimination policies, in particular when hiring and selecting personnel on the basis of inherent requirements of the contract.”*
 - Please see A.8.2 “The Code of Ethics should ensure that all persons working on behalf of the organization understand their responsibilities to abide by human rights, local, national and international law, and to prevent and report any abuses of human rights including (...) f) unlawful discrimination.” This therefore encompasses the approach to hiring at policy level, and is then supported through the procedures in, for example A.8.6.2.1 (as acknowledged).
Note that in many cases, contracts discriminate. For example, most USG contracts specify either male or female guard positions. This is done for operational reasons and these policies have stood up in court.
- In 2.2 *“Does the standard require that the company have an ongoing personnel performance review process to ensure that personnel meet appropriate physical and mental fitness standards?”*
 - *“However, performance review of personnel is not explicitly nor specifically addressed. In particular, it does not require the Company to check and ensure that personnel meet appropriate physical and mental fitness standards.”*
 - A.7.2.1.d) “It is the organization’s responsibility that all persons working on behalf of the organization are sufficiently trained, both prior to any deployment and on an ongoing basis, in the performance of their functions”
A.8.6.2.2 “The organization should establish, document, implement and maintain procedures that screen out personnel who do not meet minimum qualifications established for positions, and select appropriately qualified personnel based on their knowledge, skills, abilities and other attributes.”
It then goes on to say “The organization should also establish clearly defined criteria for the screening and vetting of individuals based on: b) physical and mental fitness for activities;” These two extracts are in the same section, therefore maintenance of competence is implicitly connected to ongoing

physical and mental standards. This is then verified through 7.5.2.2(c) – Records.

- In 2.2 *“Does the standard require that a company’s performance review process assess the ability of personnel to perform duties in accordance with principles of the Code?”*
 - *“However, the Standard does not explicitly mention personnel performance review.”*
 - See above – screening for a role against competence criteria is a performance review.
- In 2.3 *“Does the standard require the company to provide the ICoC to all subcontractors and other personnel providing security services, and to require that they operate in accordance both with the Code and with the standard?”*
 - *“The Standard does not clearly mention that the Company needs to provide the ICoC to its personnel and subcontractor.”*
 - Many at the tactical level may not be able to read. Understanding of the principles and commitments is far more important than having a copy of the code itself.
- In 2.4 *“Does the standard require that relevant employment reference materials, such as employment contracts, incorporate the Code and applicable labour law?”*
 - *“However, the Standard does not require that relevant personnel reference material, such as employment contracts, specifically incorporate the Code.”*
 - Code clause 52 states ‘appropriate incorporation’, which does not require specific incorporation. See clause 7.1.2.4 “The organization shall have a documented agreement covering subcontracted or outsourced arrangements including: a) commitment by subcontractors to abide by the same legal, ethical and human rights commitments and obligations as held by the organization and as described in this International Standard (...).”
- In 2.4 *“Does the standard require that the company make employment records accessible to ICoCA or a Competent Authority, except where prohibited by law?”*
 - *“However, the Standard does not explicitly address or require accessibility of employment records by the ICoCA or a Competent Authority.”*
 - This is covered in the confidentiality element of the agreement between the third party certification body and its client. As the Code clause 53 states ‘will be made available to any compliance mechanism established pursuant to this Code’. By demanding IAF/MLA accredited certification, the ICoCA is directly requiring that a company makes available to that CB (as the compliance mechanism) its records. For example in our standard T&Cs we have “The Client shall ensure that MSS Global is provided with all up to date, accurate and relevant information and accepts that the certification will be immediately withdrawn and/or terminated should MSS Global become aware of any incorrect, out of date or misleading information being provided to MSS Global in relation to the Services (...) and (...) the Client shall ensure that all product samples, access, assistance, information, records, documentation and facilities are made available to MSS Global when required by MSS Global, including the assistance of properly qualified, briefed and authorised personnel of the Client.”
Suggest there is no need for this ‘yellow’ as it’s already covered by a CB.
- On Training, *“Does the standard require the company to conduct training on (...) 1.the ICoC?”*
 - *“The Standard does not specifically require training on the ICoC, although it requires the Company to conduct training for all persons working on its behalf, and that most of the topics mentioned to be incorporated in the training are addressed in the Code.”*

- On Training, *“Does the standard require the company to conduct training on (...) 11.If contract involves detention duties: Applicable national and international laws; Prohibition on torture and other cruel and inhumane or degrading treatment.”*
 - *“While the Standard does not specifically deal with detention, 7.2.2 requires training in all applicable local and international laws, as well as training regarding prohibition on torture or other cruel, inhuman, or degrading treatment.”*
 - As a company is required to demonstrate its competence to undertake the tasks, it will be required to ensure these requirements are captured as part of conformance to clause 7.2.1 and 7.2.2.d “applicable local and international laws, including criminal, human rights and international humanitarian laws (...).”

Mr. Saiyed Mozaffer ul Hasan Zaidi, Director Group Communications, on behalf of Security and Management Services (Pvt) Ltd, Wackenhut Pakistan (Pvt) Ltd and Facility Specialist & Management Services (Pvt) Ltd (19 November 2016)

Comments on behalf of Security and Management Services (Pvt) Ltd, Wackenhut Pakistan (Pvt) Ltd and Facility Specialist & Management Services (Pvt) Ltd are attached for favor of kind consideration as desired please:

Annex A:

The analysis of ISO 18788 does not appropriately consider how a management system standard works, but appears to make the false assumption that a standard is written in the same format as a legal draft for legislation or regulation. It also appears to assume linear implementation of a management system standard, which is not consistent with the way a standard is implemented.

1. The conclusion, made several times in the analysis, that the ISO18788 does not “explicitly” require conformance to the ICoC is false.
 - Clause 2 “Normative references” explicitly lists: a) Montreux Document On Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict (09/2008); b) International Code of Conduct for Private Security Service Providers (ICoC) (11/2010); c) Guiding Principles on Business and Human Rights; Implementing the United Nations “Protect, Respect and Remedy” Framework 2011; and d) ISO 31000:2009, Risk management – Principles and guidelines. By definition a normative reference is indispensable to the application of the standard. Without it, the subject technical standard cannot be fully and properly utilized. Overriding ISO Central Secretariat’s objections, the ISO/PC284 deliberately make these three documents required for implementation. If an organization does not use these documents in building the management system, they cannot be in conformance.
 - 4.4 Security operations management system explicitly states: “The SOMS shall implement the principles and commitments of the ICoC.” This clause is all-inclusive and must be applied to every requirement and guidance in the standard. In standards writing, a blanket clause such as this does not need to be repeated it is an explicit requirement for conformance. However, reference is redundantly made 21 more times in the standard.
 - Anything that is contained in the ICoC is explicitly required for conformance the way the standard is written.
2. The statement *“However, the involvement of “top management” does not explicitly refer to the participation of senior operational and field management personnel in the risk assessment*

program” is purely semantic since these specific titles would be considered “top management” or would be encompassed by Clause 6.1.2 Internal and External Risk Communication and Consultation which is more inclusive than just “senior operational and field management” (terminology that is more restrictive so not used in standards).

3. The statement *“The requirement for the Company to consider the potential impact of UN Sanctions on contracts with governments and their agents could therefore be stronger”* is purely semantic since it is clearly required for conformance by Clause 2 “Normative references”, Clause 4.4 Security operations management system; and Clause 6.1.1 Legal and Other Requirements. There are redundant references to compliance with legal and regulatory requirements, so violation of UN sanctions by the organization, its subcontractors, outsource partners and supply chain partners, would automatically be excluded from being in conformance. Furthermore, if an organization even took a contract with a client that was in violation of UN Sanction, the organization would not be in conformance since a client is a supply chain partner (by definition).
4. The statement *“However, the Standard does not specifically mention registration and licensing of vehicles”* is incorrect since 6.1.1 Legal and Other Requirements explicitly references licensing. Clause 6.1.1 allies to every clause of the standard and therefore does not need to be repeated within every clause.
5. The statement *“However, the Standard only refers to “appropriate authorities” and does not require reporting to the specific authorities listed in paragraph 22 of the ICoC”* is purely semantic since it is clearly required for conformance by Clause 2 “Normative references”, Clause 4.4 Security operations management system; and Clause 6.1.1 Legal and Other Requirements. Besides no “reporting” or “authorities” are mentioned in paragraph 22 of the ICoC.
6. The statement *“However, the Standard does not contain a specific prohibition against entering a contract where performance would conflict with the Code or any applicable law”* is curious since it is clearly required for conformance by Clause 2 “Normative references”, Clause 4.4 Security operations management system; and Clause 6.1.1 Legal and Other Requirements. There are redundant references to compliance with legal and regulatory requirements which apply to its subcontractors, outsource partners and supply chain partners (including clients). Any violation of the Code or law would mean the organization would automatically be excluded from being in conformance. Furthermore, if an organization even took a contract with a client that was in violation of the Code, law or UN sanctions, the organization would not be in conformance since a client is a supply chain partner (by definition).
7. These statements are contradictory because you can’t do the first without doing the second: the Standard mentions review of policies and programs consistent with the Code and applicable contractual requirements. However, it does not specifically require a process to review contracts and ensure there is no conflict with the Code (GREEN).
8. The statement *“However, the Standard does not speak about the frequency with which background vetting and screening processes and performance review should be carried out, nor to specific occasions necessitating them (Even though personnel are asked to notify any change of situation, it does not trigger further background screening in the framework of this Standard)”* is purely semantic since it is clearly required for conformance by Clause 2 “Normative references”, Clause 4.4 Security operations management system; and Clause 6.1.1 Legal and

Other Requirements. It is further and redundantly reinforced by Clause 8.6.1.1 Selection, Background Screening, and Vetting of Personnel which states “Screening and selection measures shall be consistent with legal and contractual requirements, as well as consistent with the normative references of this International Standard.”

9. The statement “*However, the Standard does not require an explicit agreement from the Company’s personnel to participate in internal and external investigations*” is clearly required, within legal boundaries, for conformance by Clause 2 “Normative references”, Clause 4.4 Security operations management system; and Clause 6.1.1 Legal and Other Requirements. It is further reinforced by Clause 8.8.2 Internal and External Complaint and Grievance Procedures. In most countries you cannot force Personnel to agree to participate in internal investigations and disciplinary procedures, therefore this paragraph should be revised in the ICoC.
10. The text preceding the statement “*However, the Standard does not contain explicit requirements with regards to anti-discrimination policies, in particular when hiring and selecting personnel on the basis of inherent requirements of the contract*” clearly explains that the standard is consistent with the ICoC. Furthermore, the ICoC does not require a company have an “anti-discrimination policy”, so having “having procedures “preventing unlawful discrimination in employment” would be equivalent.
11. The statement “*However, performance review of personnel is not explicitly nor specifically addressed. In particular, it does not require the Company to check and ensure that personnel meet appropriate physical and mental fitness standards*” and “*However, the Standard does not explicitly mention personnel performance review*” ignore the fact that in a management system standard performance review must review all clauses of the standard, therefore, this would be covered.
12. The statement “*The Standard does not clearly mention that the Company needs to provide the ICoC to its personnel and subcontractor*” and “*The Standard does not specifically require training on the ICoC, although it requires the Company to conduct training for all persons working on its behalf, and that most of the topics mentioned to be incorporated in the training are addressed in the Code*” are puzzling and seems to illustrate a significant misunderstanding of the level of education and training needed to be in conformance with the ICoC. The ICoC was written for and by highly educated individuals with a human rights and legal background. It was not written for guards and other laypersons who need to know how to implement the concepts, not read a legalese document that is written in a fashion that will intimidate them and potentially harm their self-esteem. The standard specifically states the ICoC principles must be taught at an appropriate level for the individuals being taught.
13. The statement “*However, the Standard does not require that relevant personnel reference material, such as employment contracts, specifically incorporate the Code*” is false given this is hard-wired in Clause 2 “Normative references” and Clause 4.4 Security operations management system.
14. The ICoCA is a private corporate providing a service for a fee. It is explicitly forbidden in the standards world, particularly ISO, (and in some anti-trust laws) to require in a standard to require the services of third-party charging for a service. This is something that ICoCA can require for membership and pay-for-fee services but cannot be required by a standard or law. Therefore, the statement “*However, the Standard does not explicitly address or require*

accessibility of employment records by the ICoCA or a Competent Authority” would be a breach of ethics in the standards world.

15. All the comments in “*Mandatory Subjects for Training*” are addressed by the first comments given above.

Annex B:

General comments

1. It is very hard to see the value added by the additional burden placed on companies of a redundant certification process. In essence, after being audited on-site by professional management system standard auditors, who have demonstrated competence in auditing, the ICoCA is requesting a remote re-audit of selected documents by individuals in Geneva who have no professional credentials as auditors and no experience with management system standards.
2. The HRRR checklist is not a risk assessment it is a checklist questionnaire that provides little value added for companies conducting guarding and security operations services. By encouraging a check the box HRRR exercise, ICoCA is promoting bad risk management practice. If this is the level of understanding of risk management at the ICoCA, then it is hard to see how the ICoCA will use this information to prevent human rights abuses.
3. This costly process, rather than promote human rights, detracts from human rights. The bulk of human rights violations are due to poor training, poor work conditions, poor remuneration of personnel, and poor human resource management. The HRRR misses these issues and focuses on extremely rare activities rather than the day-to-day disrespect for human dignity. The double certification process proposed by the ICoCA will drain critical resources from security companies who work on small margins, particularly security companies in developing countries. The double certification process should be eliminated to allow those resources to be invested in better training and remuneration of guards in-country.
4. ICoCA should be promoting prevention of abuses of human rights. A double reporting and redundant certification process does the opposite. From our own experience as a wholly owned local company operating in a high risk developing country, the key to improved performance is understanding how to incorporate the PSC.1/18788/ICoC into the day-to-day activities of our personnel in a fashion that they can understand. It is making them aware that they are the risk managers and it is their behavior which determines success. To accomplish this requires appropriate education and training (not instruction in the ICoC document to damage their self-esteem). It also is accomplished by integrating risk assessment and management into every operational practice and operating procedure. Finally, it requires top management commitment and leadership. The redundant certification process and HRRR miss this target.
5. The approach the ICoCA is proposing seems to be targeting large wealthy Western companies providing security services in support of their countries military operations. Years ago, this may have been the case, but today the bulk of in-country security operations are provided for a range of activities by local developing country companies. This process is too burdensome and will only discourage local developing country

companies from improving their businesses as success is beyond their resource capabilities.

Specific comments

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

There is already confusion in the marketplace about who is a Certifying Body (CB) accredited by a national accreditation body that is itself a member of the IAF and MLA. Non-accredited CBs are already marketing their services.

Therefore, the role for ICoCA should be to maintain a database of CBs they recognize as accredited by a national accreditation body that is itself a member of the IAF and MLA. The requirement for recognition of certification should be by one of these pre-approved CBs.

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

The only role for ICoCA should be to request with the membership application:

- A copy of the third-party certification certificate from a Certifying Body (CB) accredited by a national accreditation body that is itself a member of the IAF and MLA.
 - A copy of the audit report (this includes scope of the audit, findings and conclusion of the audit, non-conformances and resolution plans, and schedule for surveillance audits.
 - Since conformance to the ICoC is a requirement of the ISO18788 and non-conformances would have to be identified in the audit report along with the action plan, no further information is required.
3. *“Provide your Non-conformance Report and Client/Auditee Action Plan.”*
 - Since conformance to the ICoC is a requirement of the ISO18788 and non-conformances would have to be identified in the audit report along with the action plan, no further information is required.
 4. *“Provide your Human Rights Risk Assessment (HRRR) or Human Rights Impact Assessment model and/or process.”*
 - This is a requirement of the standard. The standard recommends the use of the ISO31000 which is considered risk assessment best practice by the international risk management community. The ICoCA proposes an ineffective checklist questionnaire which is poor risk management practice. Is the ICoCA going to base its evaluation on something that is considered bad industry practice?
 - This is a redundant activity and should be eliminated.
 - The appropriate assumption of most of the issues listed in the ICoCA checklist questionnaire is that likelihood is low but consequences are high, so the risk should be treated. Therefore, the ICoCA checklist questionnaire is irrelevant. What is relevant is that the company assume all these risks could manifest themselves and develop policies and procedures to prevent their occurrence.

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

- This is a redundant activity and should be eliminated.
- This is the most egregious example of redundancy in the proposed process which greatly increases expense while not adding any value to the company or the pursuit of respect for human rights.
- While many large Western companies maintain all their documents and records in electronic databases this is not the case in many developing countries which maintain paper documents and records. This would be cost prohibitive and discriminate against companies in developing countries.
- ICoCA is proposing that they examine records, from Geneva, using untrained auditors after a Certifying Body (CB) accredited by a national accreditation body that is itself a member of the IAF and MLA using trained professional auditors have reviewed these documents in the field. Furthermore, the professional auditor would have conducted a Stage One Audit to make sure “on paper” and from a system of management perspective all these requirements have been adhered to. Then the professional auditor would do a Stage Two audit interviewing personnel, clients and other stakeholder to find evidence that the findings of the Stage One audit are indeed to appropriately implemented in the field. Therefore, the proposed redundant document review by untrained ICoCA auditors adds no value and no further assurances. It is also an expense that discriminates against security companies in developing countries and drains precious resources from training and guards’ remuneration.

Conclusions

- The approach the ICoCA is proposing is redundant and cost/time prohibitive.
- It is particularly discriminatory against security companies in developing countries that have little resources to spare on a redundant process, and would likely drain resources from training and remuneration of personnel.
- Rather than promote human rights it detracts from resources that could be better used.
- The ICoCA needs to go back to the drawing board and develop a system that makes business sense.
- The ICoCA is developing a complex and redundant system when they could play a simple cost-effective role. Currently, there are less than a handful of Certifying Bodies (CB) accredited by a national accreditation body that is itself a member of the IAF and MLA. Given the tiny size of the security market that would engage in this program there is little likelihood that the number of CBs will significantly increase. If it does, what ICoCA is proposing becomes even more untenable. The only role for the ICoCA should be what is suggested Specific Comment #1 coupled with witnessed audits of Certifying Bodies (CB) while they are conducting Stage One and Two audits of security companies. The ICoCA could then maintain an approved lists of Certifying Bodies (CB) and require submission of certificates and audit reports with yearly membership fees. This avoids redundancies, would increase the quality of services provided by CBS, and give a greater level of assurance of adherence to the PSC.1/18788/ICoC.

Mr. Caleb Wanga, Safety Coordinator, Usalama Reforms Forum (20 November 2016)

Some of the comments if captured in the bigger document can be ignored:

1. The standard document with the assistance of the secretariat can help in developing universal training curriculum that can be used in different countries for the security industry.
2. In matters of internal discipline, and in line with Montreux document, the standards show clearly incorporate participation of staff representative in these panels to minimize situations where people's rights can be violated.
3. The standard document should be compartmentalized so that it can be understood easily by the companies.
4. In order to help growth of smaller security companies, there is need to prescribe incremental growth strategies in the document e.g. local capacity building through country level chapters on management and human rights. Case in Kenya where there are a lot of small companies managed by people with absolutely low skills.
5. Create clusters for annual awards to encourage members e.g. most promising company of the year or most stable company in terms of revenue streams.
6. Simplify the Montreux Document and the standards document.