

## ICoCA Certification Process for “ISO 28007” certified companies

### APPLICATION FORM & GUIDANCE

Company Name: \_\_\_\_\_

Primary Point of Contact: \_\_\_\_\_

Backup Point of Contact: \_\_\_\_\_

Date Form Completed: \_\_\_\_\_

This Guidance provides directions and clarifications for companies certified to “ISO 28000/28007-1:2015 Ships and marine technology — Guidelines for Private Maritime Security Companies providing privately contracted armed security personnel on board ships” (“[ISO 28007](#)”) applying for [ICoCA Certification](#).

We invite applicants to follow the structure of this document to understand and complete the process to achieve ICoCA Certification.

## Part 1 – KEY ELEMENTS

### Overview of the ICoCA Certification Process

The Association processes ICoCA Certification applications in accordance with the principles established in the [Articles of Association](#) and the [ICoCA Certification Procedure](#). The following questions and answers will guide you step-by-step through the ICoCA Certification Process:

#### 1. What is ICoCA Certification?

- ICoCA Certification is the procedure used to certify that your systems and policies meet the Code’s principles and standards as part of your commitment to operate in accordance with the [Code](#) (“ICoC” or “International Code of Conduct”).
- ICoCA Certification requires external certification to one of the **national and international standards** that are recognised by the Board as consistent with the Code: **ISO 28007**, but also PSC.1 and ISO 18788.
- For each Board-recognised standard, the ICoCA defined **additional information** relative to human rights and humanitarian law which is needed to assess whether your systems and policies meet the requirements of the Code.<sup>1</sup>

<sup>1</sup> The ICoCA has carried out a comparative analysis of ISO 28007 and the ICoC in order to assess of the extent to which certification to ISO 28007 covers all the provisions and principles of the Code, and to identify additional information requirements to be requested by the Board. These requests for information cover the existing gap between the Code and ISO 28007 and are called “additional information”. The results of the comparative analysis are available in the [Recognition Statement for ISO 28007](#) and its corresponding annexes [A](#) and [B](#).

## 2. Are you eligible for ICoCA Certification?

In order to apply for ICoCA Certification, Member Companies need to fulfil the following conditions:

- **Be certified to ISO 28007.**<sup>2</sup>
- Having obtained the certification from an independent accredited Certification Body (CB).<sup>3</sup>
  - To ensure that the certification issued is valid, you can either ask the Certification Body about their certificate of accreditation from UKAS or ANAB to ISO 28007, or ask the Secretariat for additional information.
  - There is **no charge for ICoCA Certification** in addition to regular annual Membership dues. However, please keep in mind that Member Companies need to cover their **own costs related to their external certification** to ISO 28007 by an accredited independent Certification Body.

## 3. What information and documentation do you need to submit when applying for ICoCA Certification?

- Please **consult the form** in [Part 2](#) of this document to receive **guidance** on the information and documentation that you must provide to demonstrate that your company meets the requirements of the Code.
  - The table will help you understand the additional information requirements requested and also provides examples of documentation that your company could potentially provide to satisfy them (the list of examples is non-exhaustive and for illustrative purposes only).
- Afterwards, please **fill in the form**, also in [Part 2](#), to complete your ICoCA Certification application.
  - The ICoCA Secretariat wants to understand **how your company implements and integrates the principles of the Code into your operations, systems and procedures.**
  - You do not need to provide many documents, just the ones that reflect how your company implements the specific requirement. It is possible that several requirements will be answered by the same document or policy.

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<sup>2</sup> If you are certified to another Board-recognised standard (PSC.1 or ISO 18788), please consult and fill the corresponding form which is available [on the ICoCA website](#).

<sup>3</sup> The current list of the independent accredited Certification Bodies that are certifying to Board-recognised standards is available on the [ICoCA website](#) (Currently only [LRQA](#) and [MSS Global](#) issue independent accredited certification to ISO 28007).

- The ICoCA will analyse the information provided to assess if your systems and policies meet the requirements of the Code and the readiness of your company to fully participate in the activities of the Association.
- If your company is externally certified to **more than one** Board-recognised standard (PSC.1, ISO 18788 and/or ISO 28007), you **do not need** to fill in several application forms to apply for ICoCA Certification.

#### 4. How can you submit your ICoCA Certification application?

**Please note that the Secretariat does not send confidential or sensitive information via email.**

In order to ensure the security of all data submitted to the ICoCA Secretariat, and until a secured online platform is created, the requested information must be sent in paper form and/or copied on to a USB stick/flashdrive or CD ROM, enclosed in a sealed envelope marked “Confidential, Certification Material,” and sent via DHL, FedEx, or other courier service to:

ICoCA Secretariat, WMO Building  
Case Postale 2300, 7 Bis, avenue de la Paix  
CH-1211 Genève 2, Switzerland

**Those sending confidential or sensitive information via email to the ICoCA Secretariat do so at their own risk.**

#### 5. After submission of the ICoCA Certification application form, what is the review process?

- a) Once your completed application is received, the Secretariat will confirm reception;
  - b) The Secretariat then reviews your application and the documents provided;
  - c) Once the application has been reviewed, the Secretariat may request further clarification or documentation;
  - d) Once the Secretariat has determined that the application is complete, their recommendation with a summary of the application (excluding any confidential information) will be shared with the ICoCA Board of Directors;
  - e) The ICoCA Board of Directors may request further details, and then vote to approve or reject the application for ICoCA Certification.
  - f) Once the Board has granted your company “ICoCA Certification”, you will become an **ICoCA Certified Member**.
- Provided that you answer in a timely manner to the request for additional information or clarification, the Secretariat anticipates that the entire process may take up to **one or two months** until a final decision is taken.

**Part 2 – APPLICATION FORM**  
**ICoCA Certification for “ISO 28007” certified companies**

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in the requested information</u> in the space below &amp; <u>attach</u> the corresponding documentation</b>
1	<ul style="list-style-type: none"> <li>• <b>Company’s proof of ISO 28007 Certification;</b></li> <li>• <b>including annexes and appendices to the Certificate, if applicable.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Provide ISO 28007 certificate;</li> <li>• Provide Annexes and Appendices to the Certificate, if applicable.</li> </ul>	<p>⚠ If the company has <b>subsidiaries</b>, please <b>specify whether they are included in the scope</b> of the ISO 28007 certification.<sup>4</sup></p>	
2	<ul style="list-style-type: none"> <li>• <b>Full initial audit report (Stage 1 and Stage 2);</b></li> <li>• <b>Most recent surveillance reports, if applicable - subject to any redactions of particularly sensitive information; and</b></li> <li>• <b>Corresponding Corrective Action Plan(s).</b></li> </ul>	<ul style="list-style-type: none"> <li>• Provide the initial, and most recent audit reports if applicable;</li> <li>• Provide responses by your company and/or the Corrective Action Plan prepared by your company that relate to areas of concern or non-conformities identified by the Certification Body.</li> </ul>	<ul style="list-style-type: none"> <li>• The audit report should include all detailed areas of concern and non-conformities identified throughout the process. Your company must articulate a specific justification for each redaction explaining why the information is particularly sensitive.</li> <li>• The ICoCA attempts to fully understand the steps taken by a company to ensure that areas of concern or non-conformities (which might reflect gaps in compliance with the requirements of the ICoC) identified by the CB have been remedied (to the extent such areas of concern or non-conformities reflect topics relevant to the ICoC).</li> </ul>	

<sup>4</sup> Companies are invited to add areas to the scope of ICoCA Certification at any time, by providing evidence of the appropriate inclusion of those areas into the scope of their external certification to a given Board-recognised standard (i.e. audit reports, annexes to the certificate, certification plans, etc.) to the Secretariat.

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in the requested information</u> in the space below &amp; <u>attach</u> the corresponding documentation</b>
3	<b>Company's Human Rights Risk and Impact Assessment (HRRIA) model and/or process.</b>	Provide your company's written HRRIA model/template/process; or an example of an existing HRRIA for one of the company's operations.	Companies are expected to provide a template, an existing HRRIA process or examples that reflect: <ul style="list-style-type: none"> <li>The methodology used by your company when developing the human rights risks assessment process (including personnel involved, operational focus, circumstances and frequency of HRRIA, risk mitigation measures and subsequent revisions, etc.),</li> <li>The due diligence applied to ensure compliance with the law and the principles contained in the ICoC (which principles and/or rights are assessed?).</li> </ul>	
4	<b>Employment documentation which includes the following specific requirements:</b>		Please provide one or more documents to reflect the requirements below:	
	<b>a) How your company includes anti-discrimination in its selection and hiring policies.</b>	Provide, for instance, one or more of the following: your anti-discrimination policy; or other internal policies which describe the company's anti-discrimination process and/or commitment.	Anti-discrimination standards include anti-discrimination on race, sex, religion, colour, social origin, social status, indigenous status, disability, or sexual orientation.	
	<b>b) How your company ensures that:</b> <ul style="list-style-type: none"> <li><b>relevant employment reference materials incorporate the ICoC and applicable labour law; and</b></li> </ul>	Provide, for instance, one or more of the following: employment contracts; written job descriptions; terms and conditions of employment; or other written reference documents describing the conduct of personnel, in a language	<ul style="list-style-type: none"> <li>The document(s) shall reflect how your company includes references to the ICoC and its principles into employment materials that are references for personnel for their expected conduct when working for the company and during operations.</li> </ul>	

Information requested	Examples of relevant documentation To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	Specific requirements	Please <u>fill in the requested information</u> in the space below & <u>attach</u> the corresponding documentation
<ul style="list-style-type: none"> <li>▪ <b>that all all terms and conditions of employment are available to personnel in writing, in a language they can understand.</b></li> </ul>	understandable by them.	<ul style="list-style-type: none"> <li>• The reference document(s) shall be in a language that operational personnel can understand.</li> </ul>	
<p><b>c) How the company conducts ongoing personnel performance reviews – in particular how the company assesses:</b></p> <ul style="list-style-type: none"> <li>▪ <b>that personnel meet appropriate physical and mental fitness standards; and</b></li> <li>▪ <b>their ability to perform duties in accordance with the ICoC.</b></li> </ul>	Provide, for instance, one or more of the following: a description of a personnel performance review process; a policy/procedure describing this process; records of a personnel competency review process; or anonymised forms and checklists filled by interviewers during the process.	<p>The document(s) shall reflect how the company assesses, as part of a performance review, if its personnel:</p> <ul style="list-style-type: none"> <li>• meet appropriate physical and mental fitness standards, <i>and</i></li> <li>• operate in accordance with the principles of the ICoC.</li> </ul>	
<p><b>d) How the company’s policies ensure that no one under the age of 18 is employed to carry out security services.</b></p>	Provide, for instance, one of more of the following: a screening and vetting policy; or an employment checklist.	The document(s) shall clearly indicate that no person under the age of 18 should be employed by the company to carry out security services.	
<p><b>e) How the company requests its personnel to authorise access to references and other documentation related to prior employment and background screenings.</b></p>	Provide, for instance, one or more of the following: a model application form; an employment contract; the terms and conditions of employment; or other internal policies as part of the vetting procedures.	The document(s) shall reflect how the company, as part of the hiring process, requests the consent of the applicant/employee in order to be able to access references and other documentation relating to prior employment and other available background screenings’ content.	

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in</u> the requested information in the space below &amp; <u>attach</u> the corresponding documentation</b>
	<p><b>f) How the company ensures:</b></p> <ul style="list-style-type: none"> <li>▪ <b>that employment records are kept during and for at least seven (7) years after employment; and</b></li> <li>▪ <b>that they are accessible to a Competent Authority or the ICoCA, except where prohibited by law.</b></li> </ul>	<p>Provide, for instance, one or more of the following: an employment process and/or policy; employment contracts; terms and conditions of employment; other reference documents describing the expected conduct of personnel; or a record-keeping policy, process or records.</p>	<p>The document(s) shall reflect how the company ensures that employment records (not just screening records, but also records from during employment) are:</p> <ul style="list-style-type: none"> <li>• kept for a period of at least 7 years; <i>and</i></li> <li>• are made available to a <a href="#">Competent Authority</a> or the ICoCA - where necessary (for example for the purpose of an investigation), except where prohibited by law and while taking into consideration confidentiality and data protection requirements.</li> </ul>	
	<p><b>g) How your company ensures that passports, travel documents, and other personnel identification materials are held only for such time as is reasonably necessary for administrative processing.</b></p>	<p>Provide, for instance, one or more of the following: employment contracts; the terms and conditions of employment; an employment process and/or policy; a data protection policy or requirements; or other internal policies as part of the vetting procedures.</p>	<p>The document(s) shall reflect:</p> <ul style="list-style-type: none"> <li>• how your company manages and uses employees' identification documents, and protects their personal information, <i>and</i></li> <li>• that they are held only for such time as is reasonably necessary for administrative processing.</li> </ul>	
	<p><b>h) How your company ensures that its personnel agree to participate in company's internal and external investigations, disciplinary procedures and any public investigations conducted by Competent Authorities, except where prohibited by law.</b></p>	<p>Provide, for instance, one or more of the following: a model application form; an example of an employment contract; a consent form; an attestation form; terms and conditions of employment; or the company's grievance procedure.</p>	<p>The document(s) shall reflect how your company ensures that applicants/employees are made aware of, and agree to, their participation in company's internal and external investigations; disciplinary procedures; and/or public investigations conducted by <a href="#">Competent Authorities</a> - if necessary, consistent with national law and except where prohibited by law.</p>	

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in the requested information</u> in the space below &amp; <u>attach</u> the corresponding documentation</b>
5	<p><b>Reporting documentation which includes the following specific requirements:</b></p> <ul style="list-style-type: none"> <li>▪ <b>How your company integrates the relevant international human rights and humanitarian law into its reporting requirements, including known or reasonably suspected commissions of national and international crimes;</b></li> <li>▪ <b>How your company reports incidents related, but not limited to, international crimes, use of weapons, use of force, criminal acts, traffic accidents or incidents involving other security forces; and</b></li> <li>▪ <b>How your company ensures that incident reports are issued to the client and to <a href="#">Competent Authorities</a>, when required by law.</b></li> </ul>	<p>Provide, for instance, one or more of the following: the reporting policies or procedures; protocols that are followed to report on incidents; incident reporting guidelines; incident reports templates; or a model contract with a company's client.</p>	<p>The document(s) shall reflect how your company reports, and requires its personnel to report, known or reasonably suspected commissions of national and international crimes.</p> <p>National or international crimes to be <a href="#">reported include, but are not limited to</a>, to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary execution.</p> <p>According to <a href="#">paragraph 63 of the ICoC</a>, incident reports should include and determine:</p> <ul style="list-style-type: none"> <li>a) time and location of the incident;</li> <li>b) identity and nationality of any persons involved including their addresses and other contact details;</li> <li>c) injuries/damage sustained;</li> <li>d) circumstances leading up to the incident; <i>and</i></li> <li>e) any measures taken by your company in response to it.</li> </ul>	
6	<p><b>How your company's Rules of Use of Force incorporate the principle of proportionality.</b></p>	<p>Provide the Company's Rules of Use of Force.</p>	<p>The document(s) shall reflect how your company ensures that the principle of proportionality is included in its Rules on the Use of Force.</p>	



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7	<p><b>Training documentation which includes the following specific requirements on how your company provides training to its personnel on:</b></p> <ul style="list-style-type: none"> <li>▪ <b>The ICoC and its fundamental principles;</b> and</li> <li>▪ <b>How to use company’s mechanisms to report known or reasonable suspicion of any national or international crimes.</b></li> </ul>	<p>Provide, for instance, one or more of the following: the training policy; a list of training courses and description of the programmes; training and competency registers; training record forms; or training materials (PPT, memos, etc.).</p>	<p>The document(s) shall reflect how your company provides initial and recurrent training to its personnel on the fundamental principles of the ICoC, and as most relevant in the operating context(s).</p> <p>National or international crimes to be <a href="#">reported include, but are not limited to</a>, to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary execution.</p>	
8	<p><b>a) Your company’s grievance mechanism, which includes:</b></p> <ul style="list-style-type: none"> <li>▪ <b>violations of the ICoC and human rights -including within the company- as part of its scope;</b></li> <li>▪ <b>How records of allegations, findings, violations of the ICoC and/or disciplinary measures are kept;</b></li> <li>▪ <b>The principle of ‘fairness’;</b></li> <li>▪ <b>How allegations are investigated promptly;</b></li> <li>▪ <b>How your company ensures protection against retaliation for personnel reporting</b></li> </ul>	<p>Provide your company’s grievance, whistleblowing and/or complaints policies.</p>	<p>As a Member of the ICoCA, your company commits to establishing fair and accessible grievance mechanisms that offer effective remedies. Therefore, your company grievance mechanism shall reflect the requirements of <a href="#">paragraphs 66 and 67 of the ICoC</a>.</p> <p>In order to assist Member Companies to fulfil their commitments under the ICoC, the ICoCA drafted <a href="#">guidance</a> on how to establish an effective Company Grievance Mechanism: the <a href="#">Manual</a> explains how to use the Guidance and offers a checklist; and the <a href="#">Interpretative Guidance</a> provides further information and explanation, including more details and good practices.</p>	

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in</u> the requested <u>information</u> in the space below &amp; <u>attach</u> the corresponding documentation</b>
	<b>wrongdoings in good faith.</b>			
	<b>b) How your company's grievance process is published on a publicly accessible website.</b>	Provide a link towards the relevant page on your company's website.	Your company grievance mechanism, and a relevant description of the mechanism, shall be easily accessible to all employees and third parties on your company's website.	
	<b>c) How your company coordinates the reception and management of grievances by third parties with its client.</b>	Provide a document that shows the relationships and commitments between your company and its client regarding reception, management and reporting of grievances, such as a model contract with the client.		
<b>9</b>	<b>How your company ensures a healthy and safe environment, in absence of such a policy by the Master.</b>	Provide, for instance, your company's health and safety policy.	The document(s) shall reflect how your company ensures the application of a health and safety policy in the absence of one enforced by the Master.	
<b>10</b>	<b>How your company integrated anti-corruption and bribery standards into a policy.</b>	Provide your company's anti-corruption and bribery programme/policy, or a description on how anti-corruption and bribery standards are included in the company's systems and procedures.		
<b>11</b>	<b>How your company ensures that its subcontractors that provide security functions:</b>  • <b>apply the same (or substantial equivalent) personnel</b>	<ul style="list-style-type: none"> <li>Provide, for instance, the policy or model contract your company uses to require subcontractors to carry out vetting and screening in a manner that is consistent with the ICoC and to</li> </ul>	<p>A "subcontractor" shall be understood as "any external company that provides security services on behalf of another PSC."</p> <p>The document(s) shall reflect, if the subcontractors providing security functions</p>	

	<b>Information requested</b>	<b>Examples of relevant documentation</b> To be provided to cover the requested information. List is <b>non-exhaustive</b> , for <b>illustrative purposes</b> only.	<b>Specific requirements</b>	<b>Please <u>fill in the requested information</u> in the space below &amp; <u>attach</u> the corresponding documentation</b>
	<p><b>screening and vetting requirements in selecting and vetting their own personnel; and</b></p> <ul style="list-style-type: none"> <li>• <b>be bound by the principles of the ICoC.</b></li> </ul>	<p>follow the provisions and principles in the Code while operating; <i>and</i></p> <ul style="list-style-type: none"> <li>• An explanation of how your company monitors compliance with this requirement.</li> </ul>	<p>cannot perform the selection, vetting and training procedures required by the ICoC, your company ensures that those procedures are conducted in accordance with the ICoC.</p>	
12	<p><b>How your company makes sure that:</b></p> <ul style="list-style-type: none"> <li>▪ <b>performance in existing contracts/new contracts does not/would not directly and materially conflict with the ICoC; including that</b></li> <li>▪ <b>the activities to be carried out as part of a contract are not contrary to United Nations Security Council Sanctions.</b></li> </ul>	<p>Provide, for instance, one or more of the following: a risk management policy; a general or commercial risk assessment; a HRRIA associated with given projects that show how your company assesses whether the execution of a contract could conflict with UN Security Council sanctions; the description of a performance review for a given project that would show how your company assesses if the execution of a contract conflicts with the ICoC; or a procurement policy and procedures.</p>	<p>The document(s) shall reflect how your company ensures that its operations, clients, partners, procurement practices -and any other aspects related to its activities in a certain country- are not violating United Nations Security (UNSC) sanctions (for example, how your company ensures it does not violate an arms embargo or that it does not contract with a sanctioned individual).</p> <p>The list of UNSC sanctions is available <a href="#">here</a> for information.</p>	
13	<p><b>How your company ensures that all vehicles or vessels used while fulfilling its contractual responsibilities are:</b></p> <ul style="list-style-type: none"> <li>▪ <b>registered and licensed with relevant national authorities; and</b></li> <li>▪ <b>are individually identifiable while on duty.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Provide, for instance, one or more of the following: the relevant licensing system, a related policy or procedure, or a proof of appropriate licensing.</li> </ul>	<p>The document(s) shall reflect how your company ensures that the vehicles or vessels used during the operational activities (including vehicles to transfer or transport personnel and vehicles used to conduct security operations) are:</p> <ul style="list-style-type: none"> <li>• registered and licensed as appropriate with national authorities, <i>and</i></li> <li>• individually identifiable when carrying out those activities.</li> </ul>	