



International  
Code of Conduct  
Association

## ICoCA COMPLAINTS FORM

### INSTRUCTIONS

The International Code of Conduct Association (ICoCA) receives and processes complaints of alleged violations of the International Code of Conduct for Private Security Service Providers ('the Code') by its Member companies. [The Code](#) includes a wide range of standards and principles for the responsible provision of private security services which can be broadly summarized in two categories: first, principles regarding the conduct of Member company personnel based on international human rights and humanitarian law standards including rules on the use of force, sexual violence, human trafficking and child labour; and second, principles regarding the management and governance of Member companies including the selection, vetting and proper training of personnel.

Where a Complainant seeks support, the ICoCA facilitates access to fair and accessible grievance procedures that may offer an effective remedy, including through providing the Complainant with access to ICoCA's own Good Offices. For Member companies, the Association provides guidance on establishing and maintaining fair and accessible grievance procedures in compliance with the Code.

Two types of complaints may be reported to the Association:

**(1) Complaints from an individual or his or her representative alleging harm caused by an alleged Code violation by an ICoCA Member company:**

If you are a Complainant and you are filing a complaint for harm resulting from the activities of an ICoCA Member company, or are the representative of an individual or group harmed by the activities of an ICoCA Member company, all of the following criteria must be met for the ICoCA to receive the complaint:

- The complaint involves an ICoCA Member company;
- The complaint contains specific allegations of conduct that, if true, would constitute a violation of the Code; and
- The Complainant or his or her representative alleges harm as a result of the ICoCA Member company's activities.

**(2) Complaints by an individual or group with credible evidence of an alleged Code violation by an ICoCA Member company:**

If you are a Complainant and you are filing a complaint because you have credible evidence of or have observed an alleged Code violation by an ICoCA Member company, all of the following criteria

must be met for the ICoCA to receive the complaint:

- The complaint involves an ICoCA Member company; and
- The complaint contains specific allegations of conduct that, if true, would constitute a violation of the Code.

Complaints that do not meet these criteria, for example purely contractual or personnel disputes, will not be considered.

If your complaint meets these conditions, we kindly ask you to fill in the following complaints form or contact us directly.

Please choose from the following options:

- Send it via mail to:  
International Code of Conduct for Private Security Service Providers' Association  
7bis, avenue de la Paix  
CH-1202  
Geneva Switzerland
- Contact us by e-mail: [secretariat@icoca.ch](mailto:secretariat@icoca.ch)
- Call us via phone, Viber, WhatsApp or Skype (We speak English, French, Spanish and German. If you do not speak any of these languages please write us a message in the language you prefer):
  - +41 79 440 34 14
  - Skype contact: [secretariat@icoca.ch](mailto:secretariat@icoca.ch)
- Write a message via WhatsApp or Viber:
  - +41 79 440 34 14

Please note that contacting the ICoCA does not prevent Complainants from pursuing alternative proceedings or mechanisms for resolving the complaint.

Unless specified in writing otherwise, all information provided shall be treated as **confidential**.

**Complaints may be submitted anonymously.** Please indicate this in the complaints form and, explain the reasons why. In this case the Secretariat will handle the complaint with special care, and take all reasonable steps to protect the identity of the Complainant.

### Next Steps

The process is guided by either or both the Article 12 and Article 13 Procedures depending on the nature of the complaint and the parties involved. The process includes the following steps:

- The ICoCA will review the complaint received to ensure the criteria listed above has been met and the information is complete.

- If the complaints form is incomplete or missing necessary information, where possible, the ICoCA will return the complaint to the Complainant. The Complainant may correct the form and re-submit the complaint.
- Unfounded or frivolous complaints, complaints of contractual or personnel disputes, and complaints not meeting the criteria above will not be accepted by the ICoCA. Complainants will be notified as to why the complaint cannot be considered.
- If the complaint involves allegations of criminal activity, the Association may report that violation to one or more Competent Authorities with jurisdiction to investigate and prosecute the crime. In order to avoid serious prejudice to any such investigations or proceedings or party thereto, the Association may suspend or limit the complaints process until the conclusion of the investigation or proceedings.
- For all remaining claims, the ICoCA will review the complaint to determine the nature of the complaint:
  - (1) Complaints seeking a remedy for an alleged Code violation will be accepted for processing along with an explanation of applicable confidentiality rules, processing and timeline. This also includes further explanation as to the role of the ICoCA in facilitating access to a fair and accessible grievance procedure that may offer an effective remedy such as the Member company's grievance mechanism, ICoCA's Good Offices, mediation or alternative grievance procedures.

#### **Processing Timeline**

Within 30 days<sup>1</sup> of receiving a complaint accepted for processing, the ICoCA will inform the Complainant whether or not the ICoCA Member company's mechanism is assessed to be viable, of options to pursue the claim and the next steps.

#### **Transparency**

Once a complaint alleging harm is accepted for processing, the ICoCA publishes summary information on its website without naming the parties. This information includes when a complaint was filed, the status of the complaint and the general nature of the alleged Code violations. While the complaint is being processed the parties involved are kept informed, but details of the case are not made public. At the conclusion of the case, ICoCA will make the results of the process available in a public report or statement including the name of the affected Member company.

- (2) Complaints with credible evidence of an alleged Code violation by an ICoCA Member company will be addressed with the Member company consistent with the Article 12 Procedures for Reporting, Monitoring and Assessing Performance and Compliance.

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<sup>1</sup> This time may be extended, as required, where the Complainant or his/her representative fails, for good reason, to timely respond to requests from the Secretariat for additional information.

## Information about the Complainant

### 1. Are you submitting this form:

1.1. As an identified Complainant?

1.2. On behalf of one or more identified Complainant(s)?

1.2.1. If you are submitting the complaint on behalf of one or more identified Complainant(s), please explain your relationship to the Complainant(s).

1.2.2. If you are submitting the complaint on behalf of one or more identified Complainant(s), please provide sufficient information for the Association to understand the relationship of the Complainant to the subject of the complaint (e.g. "local landowner" or "former employee").

1.3. Anonymously?

1.3.1. If you are submitting this complaint anonymously, please explain the reasons why.

1.3.2. Please provide sufficient information for the Association to understand the relationship of the Complainant to the subject of the complaint (e.g. “local landowner” or “former employee”).

**2. Your details:**

Family name: \_\_\_\_\_

First name: \_\_\_\_\_

How can we contact you (phone, e-mail or other)?

### Information about the Company

**3. Name of the Member Company that is accused of harming the Complainant.** If the name of the Company is not known, please provide other identifying information that will allow the Association to attempt to identify the Company and determine whether it is a Member of the Association. Other identifying information might include photographs, vehicle markings, logo, or other symbols.

Name/Description of the Member Company:

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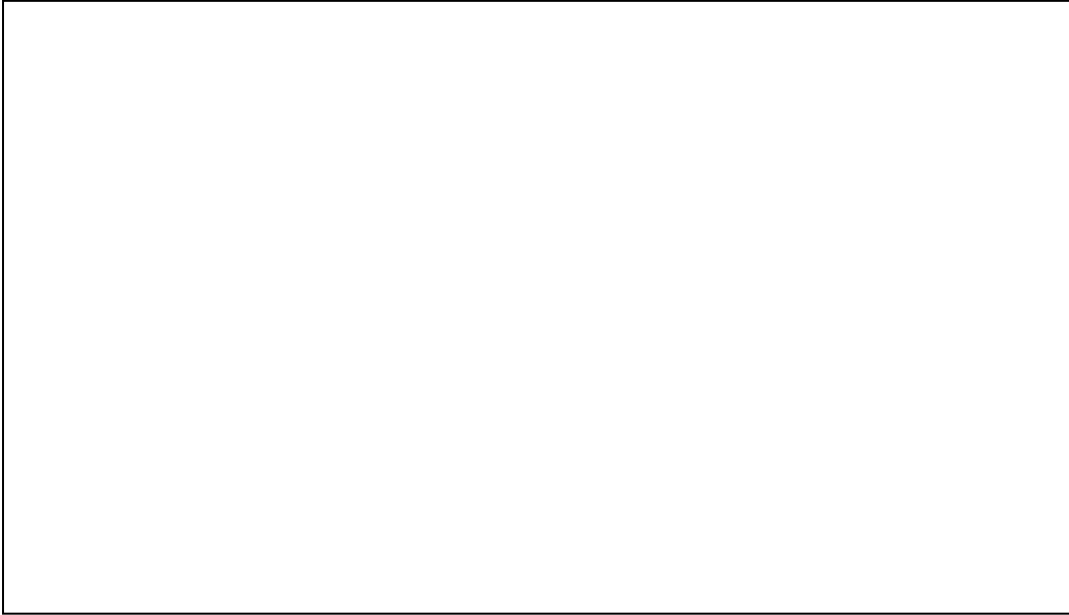
## Information about incident(s)

### 4. Please tell us what happened

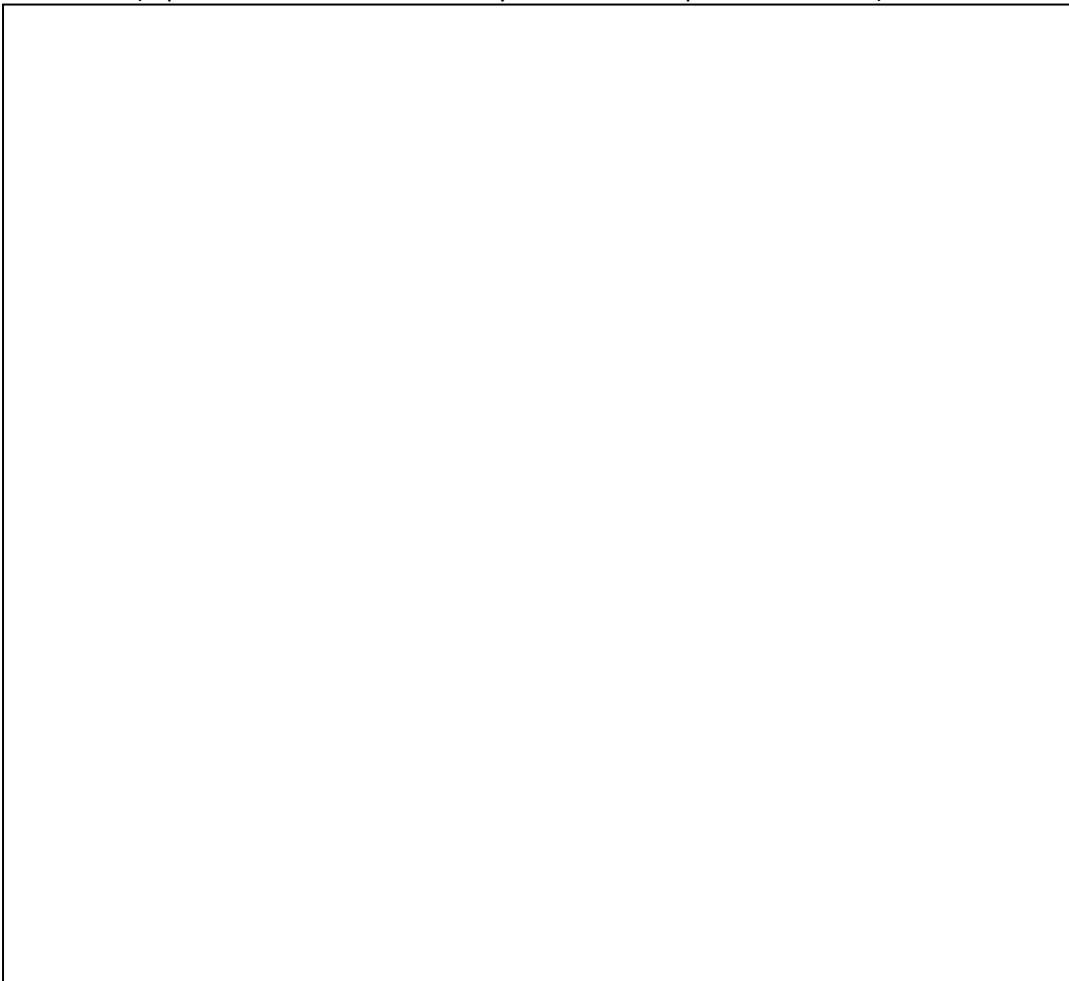
- **What** happened (please include an explanation of the alleged Code violation)?

- **When** (Date/Time)?

- **Where** (Place)?



- **Witnesses** (If possible indicate name and your relationship to the witness)





### Your confirmation

I hereby declare that I have reviewed the complaint and that all of the information provided in this form is true and accurate in all respects and for all the persons concerned.

Please tick this box if you agree: