

CMSI Consultation Response

Respondent Details

NAME

Nada Bessassi

COUNTRY

Switzerland

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Other: Multi-stakeholder Initiative

ORGANISATION

ICoCA

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

QUESTION 1

The governance principles that guided the development of the governance model are inclusive, effective, credible, impact-driven, pragmatic and efficient. From your perspective, does the proposed governance model meet expectations for consistency with these principles?

Response: 3: Meets expectations

QUESTION 2

Does the proposed governance model ensure no single group is able to unduly influence decisions?

Response: yes

Document:
Assurance

QUESTION 1

From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 3: Meets expectations

Document:
Standard

Performance Area 11: Security Management

SECTION: 11.1 Security Management, Foundational Practice

COMMENT:

Add new element:

Encourage private security providers to join the Responsible Security Association (ICoCA), and/or publicly commit to implementing the International Code of Conduct for Private Security Providers.

Reasoning:

ICoCA conducts human rights due diligence of its member and affiliate companies, both upon joining and continually. All such companies are subject to ongoing ICoCA monitoring and ICoCA's complaints mechanism.

SECTION: 11.1 Security Management, Good Practice, 7

COMMENT:

Modify 7. Currently:

Encourage private security providers to implement the International Code of Conduct for Private Security Providers

Change to:

Require private security providers to join the Responsible Security Association (ICoCA).

Reasoning:

Implementing the International Code of Conduct for Private Security Providers requires no external verification, and does not ensure third party monitoring.

The CMSI draft references UNGPs and subsequent regulations, e.g. EU CSDDD, which require demonstration of human rights due diligence. Self-reporting implementation does not satisfy due diligence requirements.

As highlighted in Annex 1, numbers 1 & 2, of the EU CSDDD, as referenced on page 10 in the CMSI draft, private security is highlighted as a particular risk.

ICoCA conducts human rights due diligence of its member and affiliate companies, both upon joining and continually. All such companies are subject to ongoing ICoCA monitoring and ICoCA's complaints mechanism.

SECTION: 11.1 Security Management, Leading Practice, 4

COMMENT:

Modify 4. Currently:

Require private security providers to implement the International Code of Conduct for Private Security Providers

Change to:

Require private security providers to become certified members of the Responsible Security Association (ICoCA).

Reasoning:

Implementing the International Code of Conduct for Private Security Providers requires no external verification, and does not ensure third party monitoring.

The CMSI draft references UNGPs and subsequent regulations, e.g. EU CSDDD, which require demonstration of human rights due diligence. Self-reporting implementation does not satisfy due diligence requirements.

As highlighted in Annex 1, numbers 1 & 2, of the EU CSDDD, as referenced on page 10 in the CMSI draft, private security is highlighted as a particular risk.

ICoCA conducts human rights due diligence of its member and affiliate companies, both upon joining and continually. All such companies are subject to ongoing ICoCA monitoring and ICoCA's complaints mechanism.

QUESTION 1

Does the scope, content, and narrative style of the consolidated standard meet your individual expectations and the collective industry expectation for responsible production practices?

Response: 3: Meets expectations

QUESTION 2

Do the requirements meet your expectations for being sufficiently clear to support consistent and practical implementation and to achieve necessary performance improvement?

Response: 3: Meets expectations

QUESTION 3

From your perspective, does the three-level performance structure (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an effective on ramp and clear articulation of good practice and effective path to continuous improvement?

Response: 3: Meets expectations

Document:
Claims

QUESTION 1

We would value perspectives on a few additional questions related to threshold of performance associated with achievement claims. Please click here/ see page 11 of Reporting and Claims Policy.

Response: No Response