

Final report: Evaluation of DCAF's project 'The ICoCA Implementation Support and Promotion'

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List of abbreviations

DCAF	Geneva Centre for the Democratic Control of Armed Forces
EQ	Evaluation Question
FDFA	Federal Department of Foreign Affairs of the Swiss Confederation
ICoCA	International Code of Conduct Association
ICoC	International Code of Conduct
MoU	Memorandum of Understanding
NGO	Non-Government Organisation
OECD	Organisation for Economic Co-operation and Development
PSC	Private Security Company
CSO	Civil Society Organisation
UN	United Nations

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Executive Summary

Introduction

The Federal Department of Foreign Affairs of the Swiss Confederation acting through its Human Security Division (FDFA) contracted Blomeyer & Sanz on 1 October 2017 to conduct the independent evaluation of the Geneva Centre for the Democratic Control of Armed Forces' (DCAF) project 'The International Code of Conduct Association (ICoCA) Implementation Support and Promotion' (the project). The evaluation covered the period 1 October 2015 to 30 June 2017.

The evaluation focused on the project's relevance, effectiveness, impact, efficiency and sustainability, and was conducted on the basis of desk research and some 34 semi-structured interviews with relevant stakeholders.

The evaluation was somewhat constrained by the absence of an explicit logical framework for the project and related qualitative / quantitative indicators and corresponding monitoring data and the stakeholders' difficulties to differentiate between the project and other related ICoCA and DCAF activity.

Findings

- **Relevance:** The project was found to be of strong relevance to the Swiss Initiative (focus on 'operationalising' the Swiss Initiative) and to stakeholder needs. DCAF's involvement represents strong added value (experience, expertise, neutrality, flexibility, presence on the ground, network etc.), both within and outside the project. A series of emerging needs were identified (scopes of application of the Montreux Document and ICoC/A; types, location and size of PSCs etc.), and DCAF is well positioned to address these needs in future support.
- **Effectiveness:** Stakeholders agreed on the project having contributed in a very substantial way to the achievement of immediate objectives, i.e. the development of ICoCA organisational functions (e.g. human resources, procurement/financial management etc.) and the core functions of certification, monitoring and complaints. Indeed, during the project period (2015-2017), the necessary documentation and processes, most notably for certification, were put in place and started operating. DCAF's support with this proved essential, with project support operationalised via the functions of the Project Officer / Coordinator and the Interim Director.

- **Impact:** It is still early to assess impact, i.e. achievement of medium term objectives in terms of ICoCA actually delivering its different core functions. Stakeholders pointed to a series of questions that can be addressed under future support, e.g. who provides certification? the role of governments and private sector clients in incentivising certification? the need for stronger CSO and PSC capacities? etc.
- **Efficiency:** Stakeholder feedback on efficiency (project structures and processes) was largely positive, with DCAF having responded well to challenges such as the unexpected departure of ICoCA's first Executive Director. Whilst access to project information was considered good, there is room for improving project reporting. Positive feedback was also collected on the governance arrangements, noting the positive features of the multi-stakeholder approach.
- **Sustainability:** Whilst it is still early to assess sustainability, at this stage stakeholders considered ICoCA to remain strongly dependant on DCAF 'technical' support and FDFA financial support. Models on future sustainability are currently under development.

Recommendations

Drawing on the evaluation findings, the evaluation makes 16 recommendations: (1) Monitor project performance; (2) Strengthen project visibility; (3) Communicate the Swiss Initiative; (4) Intensify the dialogue between the Montreux Document and ICoCA; (5) Assess potential to benefit from the experience of the Voluntary Principles; (6) Develop CSO monitoring and complaints capacities; (7) Strengthen CSO membership; (8) Joint ICoCA/DCAF programming of outreach; (9) Assess the language barrier for certification; (10) Incentivise ICoCA membership; (11) Develop PSC capacities; (12) Support CSO communication; (13) Enhance project reporting; (14) Strengthen 'internal' communication; (15) Promote in-kind support; and (16) Research on funding models.

1.Introduction

This section introduces the evaluation report by briefly commenting on Evaluation scope and objectives(section 1.1), Methodology (1.2), and Report structure (1.3).

1.1. Evaluation scope and objectives

1.1.1.Evaluation scope

The evaluation focused on the DCAF project 'The International Code of Conduct Association (ICoCA) Implementation Support and Promotion' (in the remaining text referred to as 'the project'), as implemented between 1 October 2015 and 30 June 2017.¹

The project constituted the fifth phase of DCAF support for the International Code of Conduct (ICoC) and the Association. Earlier support covered: '*Phase I constituted of identifying standards and good practices for PMSCs and effective accountability mechanisms through multiple workshops, Phase II entailed the release of first draft for public consultation, various multi-stakeholder workshops and consultations, and Phase III developed the framework for the ICoC oversight mechanism.*'² Phase IV focused on the launching of ICoCA (in 2013).

The project budget originally amounted to CHF 592,834 with the FDFA contributing CHF 488,200 (around 82%) and DCAF CHF 104,634 (around 18%).³ This was amended in the summer of 2017 with the project budget increasing to CHF 764,048 with the FDFA contributing CHF 527,975 (around 69%) and DCAF CHF 236,073 (around 31%).⁴

Exhibit 1 presents an outline of the project, based on the Memorandum of Understanding (MoU) between DCAF and ICoCA (2015).⁵

¹ Note that this is not to be confused with an evaluation of the ICoC or the ICoCA.

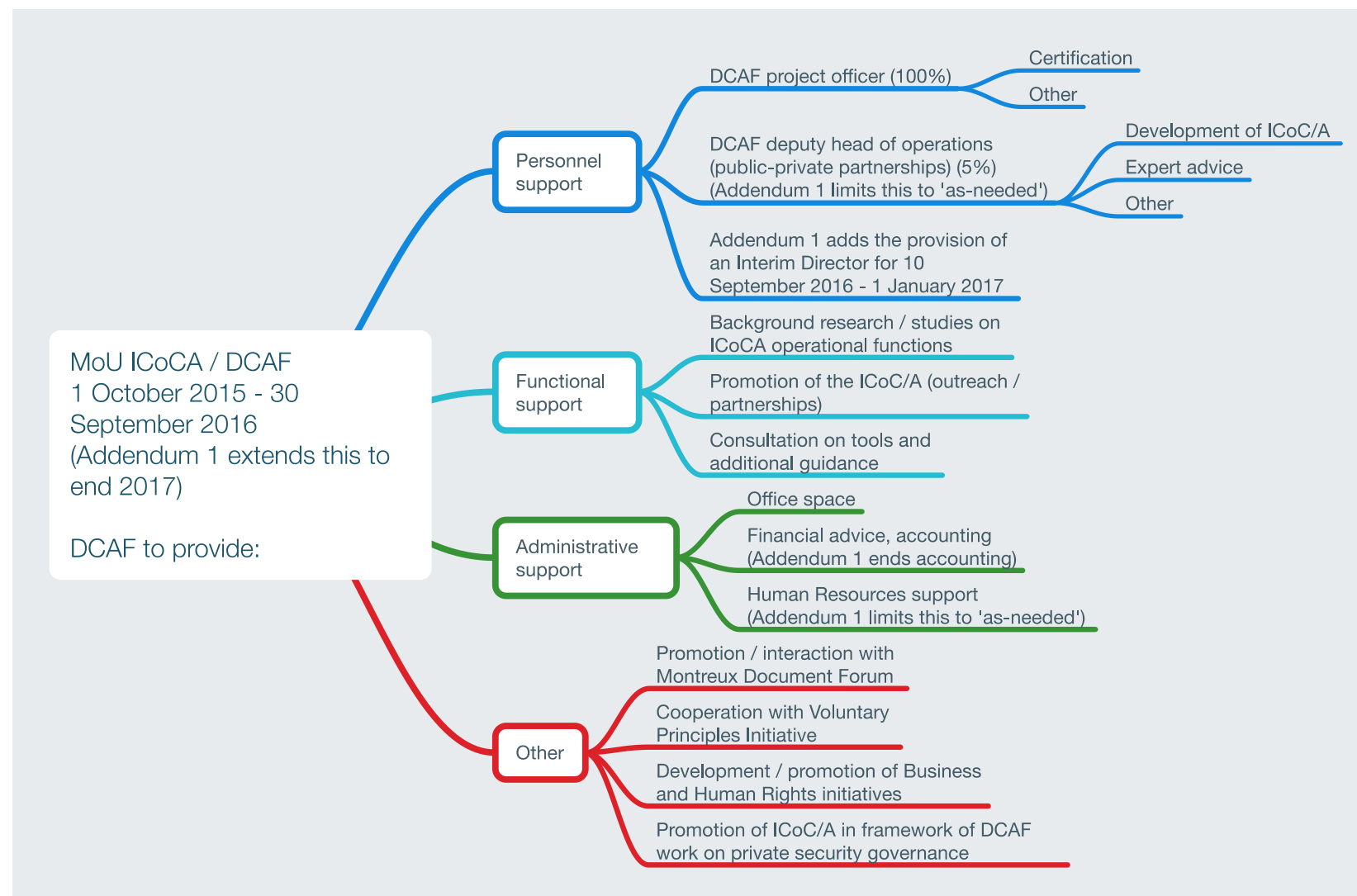
² DCAF, The International Code of Conduct Association, Implementation Support and Promotion, Draft Discussion Paper – Phase V, not dated. Note that DCAF facilitated documentation on earlier related activities, covering the years 2009 to 2015, and referenced as documentation corresponding to phases I to IV of the project

³ Demande de Cr dit Division S curit  humaine, 18 September 2015

⁴ Contract amendment, 25 July 2017

⁵ Memorandum of Understanding between The International Code of Conduct for Private Security Service Providers' Association (ICoCA) and The Geneva Centre for the Democratic Control of Armed Forces (DCAF), 14 October 2015

Exhibit 1 – MoU between DCAF and ICoCA



1.1.2. Evaluation objectives

The Terms of Reference (ToR) defined the overall evaluation purpose as follows: *'Assess the contribution of DCAF support to the ICoCA and implementation of the ICoC, and identify key priorities and avenues of DCAF support in an eventual next phase'*. The evaluation of the DCAF project was to be both 'summative' and 'formative':

- Summative evaluation: This assesses the performance of the DCAF project. The focus is on understanding what has been achieved and why, and comprising an element of accountability to FDFA, DCAF and ICoCA stakeholders.
- Formative evaluation: This aims to enhance performance with a view to the future, most notably the design and delivery of future potential actions to consolidate ICoC/A. Here, the focus is on developing pragmatic recommendations to help the decision-makers to improve the design and implementation of future support.

1.2. Methodology

The evaluation was operationalised with the help of a set of evaluation questions (EQ), focusing on the evaluation criteria of relevance, effectiveness, impact, efficiency and sustainability, drawing on the approach adopted by the Organisation for Economic Co-operation and Development (OECD).⁶ The evaluation was conducted on the basis of desk research and some 34 semi-structured interviews with relevant stakeholders (by telephone / Skype) and during a mission to Bern and Geneva (30-31 October 2017).⁷

⁶ <http://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm>. Note that the FDFA's auto-evaluation report of 8 January 2016, and covering the period 1 January 2013 to 30 September 2015 (Project phase IV) was also conducted on the basis of the OECD approach.

⁷ On 7 and 8 November, the evaluators send interview requests to nine certified PSCs, and all CSO and government members of ICoCA, as well as all ICoCA Executive Board members and other stakeholders (e.g. relevant FDFA departments, UN bodies).

Annex 2 - Consultations' shows the stakeholder consultations.

Interviews were structured around the EQ. The ToR included a set of EQ, that the evaluator revised during the inception period, e.g. to address overlaps / conflation between different evaluation criteria, to organise EQ according to importance etc. The EQ derive from the project's theory of change. Indeed, the Credit Application (2015) includes a theory of change.⁸ On this basis, the evaluators understood that:

- DCAF personnel, functional, administrative and other support contributes to ICoCA's enhanced institutional structures and human capacities, in terms of ICoCA's certification, monitoring, complaints and other activity (immediate objective, corresponding to the evaluation criterion of effectiveness).⁹
- This helps ICoCA improve its performance in terms of actually delivering certification, monitoring, complaints and other activity (medium-term objective, corresponding to the evaluation criterion of impact).
- ICoCA's improved performance is in turn expected to help ICoCA achieve its wider objectives as set out in its Articles of Association (Article 2.2): *'to promote, govern and oversee implementation of the International Code of Conduct for Private Security Service Providers (...) and to promote the responsible provision of security services and respect for human rights and national and international law in accordance with the Code'*. In more general terms, this relates to ICoCA's mission statement: *'to ensure protection and provide remedy to victims of abuse by private security providers (...) to prevent excessive use of force; to prevent torture and other degrading treatments or punishments; to prevent sexual exploitation and abuse, and gender-based violence; to prevent human trafficking, slavery and forced labour; to protect the rights of children; and to prevent discrimination'*.¹⁰ Note that the evaluation does not cover a review of the extent of possible achievement of this wider objective.

Finally, it is worth noting that evaluations build on pre-defined theories of change (as outlined above), but also on logical frameworks, including baselines (the situation at the outset of the intervention), targets to be achieved by the end of the project, and quantitative and qualitative indicators to allow for a measurement of the extent to which operational objectives (outputs / efficiency), immediate objectives (outcomes / effectiveness), and to a lesser extent, medium term objectives (impact) are being achieved. The project documentation shared with the

⁸ Demande de Crédit Division Sécurité humaine, 18 September 2015

⁹ This relates to outcomes: 'des modifications vérifiables en rapport avec les personnes, organisations et institutions concernées par le projet'. The auto-evaluation of the project's Phase IV confirmed the following outcomes: 'Établissement du secrétariat de l'ICoCA en tant que plateforme d'action pour le succès de l'initiative. Mise en place d'une relation de travail avec les clients étatiques et commerciaux des entreprises de sécurité privées. Renforcement des standards internationaux. L'ICoC est reconnu en tant que modèle d'initiative multipartite dans le domaine entreprises et droits de l'homme'. FDFA (2016) Auto-évaluation au sein de la Division Sécurité humaine.

¹⁰ <https://icoca.ch/en/icoc-association>

evaluator did not include an explicit logical framework, and the evaluator did not come across references to any efforts to collect and document monitoring data. The existing project reports (there is one for the project's Phase V) present lists of activities, however, there was no qualitative or quantitative monitoring data allowing for an assessment of the extent to which objectives were being achieved (see Recommendation 1: '**Monitor performance**').¹¹ The meetings with FDFA, DCAF and ICoCA on 30 and 31 October 2017 allowed addressing this issue. It was noted that the project constituted the 5th phase of a broader initiative to promote governance and respect of human rights by PSCs, involving different stakeholder groups, with, at times, different needs and interests. This required a flexible approach, allowing to align support to changing needs and priorities, and stakeholders therefore refrained from defining baselines, measurable targets for the achievement of objectives and the corresponding (quantitative and qualitative) indicators.

The evaluators addressed this gap by conducting a large number of interviews. Notwithstanding, several stakeholders flagged their (very) limited involvement in activities relating to 'the project' and pointed to their limited knowledge about 'the project' (what DCAF did within the framework of the project and what it did in other capacities) (see Recommendation 2: '**Strengthen visibility**'). As a result, they either declined the invitation or were reluctant to participate. Explaining the aim of the interview (to also collect the views of organisations only peripherally involved) and stressing an interest in partial answers to the questionnaire sent to them with the invitation, a total of 34 stakeholders agreed to the consultations.

'Annex 3 – Evaluation questions' presents the EQ as revised in discussion with FDFA, DCAF and ICoCA during the initial briefing of 30 and 31 October 2017.

1.3. Report structure

The evaluation report is organised in three main sections, namely:

- this Introduction (section 1), including detail on the evaluation scope and objectives, methodology and report structure;
- the Findings (2), presenting findings per evaluation criterion, i.e. relevance, effectiveness, impact, efficiency, and sustainability;
- and Recommendations (3), organised per evaluation criterion, and noting the target audience for the recommendation.

¹¹ DCAF, Project: The International Code of Conduct Association – Implementation Support and Promotion (1 October 2015 – 30 September 2016) Project Number (Swiss FDFA): 632243, Operational Report A, 30 November 2016

2. Findings

This section presents the evaluation findings, organised by evaluation criterion, i.e. Relevance (section 2.1), Effectiveness (2.2), Impact (2.3),

Efficiency (2.4), and Sustainability (2.5). This section mainly responds to the evaluation's summative perspective, i.e. the question as to what has been achieved and why.

Please note that some findings are shown in underlined text. This refers to findings that will be further developed in the section 'Recommendations' (3).

2.1. Relevance

External coherence: How does the project support the overall goals of the so-called 'Swiss Initiative'?

There is no explicit overarching strategy framework

Stakeholders noted that the Swiss Initiative is not supported by any dedicated (government or other) strategy document, i.e. a strategy document specifically dealing with the Swiss Initiative, setting out the objectives of and relationships between the Montreux Document, the Voluntary Principles and ICoC/A, and addressed to all stakeholders including governments, CSOs and PSCs (see Recommendation 3: '**Communicate the Swiss Initiative**').¹² ICoC/A stems from the Montreux Document, was initially supported by the FDFA's Directorate of International Law, with the human rights perspective progressively assuming prominence. The process is characterised by 'path dependence' with the ICoC triggering step-by-step operationalisation via the establishment of ICoCA and development of its different functions. Synergies between relevant FDFA departments are facilitated by exchanges in the context of ICoCA events, i.e. the General Assembly.

The relationship between the Montreux Document and ICoC/A

The Montreux Document is considered the 'chapeau', referring to States' responsibilities regarding Private Military and Security Companies', but not directly providing for a practical mechanism for their involvement. ICoC/A allows integrating the voice of industry. Whilst the Montreux Document primarily speaks to governments, ICoC/A speaks to PSCs, and some stakeholders considered ICoCA to be the leading implementation mechanism of the Montreux Document, in terms of its three core functions, but also in terms of providing a forum for dialogue between PSCs and governments.

¹² FDFA feedback notes that 'the ICoCA is for example included in the Swiss National Action Plan to implement the UN Guiding Principles on Business and Human Rights and the Federal Council's message on the continuation of peace and human rights promotion activities 2012-2016, as well as the message on cooperation 2017-2020'. See <https://www.news.admin.ch/newsd/message/attachments/48579.pdf> and <https://www.admin.ch/opc/fr/federal-gazette/2016/2179.pdf>

Stakeholders pointed to some degree of subject-matter conflation since the Montreux Document covers military and security activities, whilst ICoCA focuses on 'non-military' security. However, some PSCs provide both, non-military and services comparable to military services.

Under the Montreux Document Forum, an ICoCA Working Group was established according to Art. 12 Working Practices of the Montreux Document Forum in order to provide advice to ICoCA, which in turn mentions the ICoCA Working Group in Art. 10 of its Articles of Association. The dialogue between the two allows collecting advice from Montreux Document Participants on national and international policy and regulatory matters. Stakeholders noted that the Working Group also allowed for the exchange on different points of view (e.g. it was noted that there were different points of view among Montreux Document Participants with regard to giving PSC a voice). The Working Group, comprising some 20 members, has been led by two ICoCA members (Sweden until 2016, and the United States since 2017). The Working Group has been meeting twice a year, however, with ICoCA now fully operational there might be room to intensify the Working Group's engagement with ICoCA, e.g. via more frequent meetings. In this context, it was also noted that the Working Group has experienced a prominent role of ICoCA member governments (see Recommendation 4: '**Intensify the dialogue between the Montreux Document and ICoCA**'). Giving the Working Group access to relevant documentation in advance to the ICoCA General Assembly was considered a good practice; this allowed the Working Group to provide comments.

Voluntary Principles on Security and Human Rights

Stakeholders saw a clear link between the Voluntary Principles and ICoC/A at the policy level, but less so in terms of implementation where ICoC/A and the Voluntary Principles were considered to move in somewhat different directions. This relates to ICoCA having attracted mainly the larger PSCs, whilst the Voluntary Principles are a multi-stakeholder initiative for the extractive industry, which doesn't include a strong oversight mechanism to verify compliance. Whilst the Voluntary Principles do not differentiate between large and small PSCs, some stakeholders considered the Voluntary Principles to have taken a stronger interest in smaller PSCs. DCAF was considered to have acted as a bridge, e.g. by engaging with PSCs, but also with companies from the extractive industries that might contract PSCs. There might be room for ICoCA to benefit from the experience that the Voluntary Principles have gathered over the years in terms of engaging with the private sector, or in terms of engaging with the Voluntary Principles as a 'door opener' to engage with extracting companies (see Recommendation 5: '**Assess potential to benefit from the experience of the Voluntary Principles**').

Unaddressed needs under the Swiss Initiative

The interviewees highlighted various issues pertaining to the Swiss Initiative where it was considered that more work needed to be done. This related to perceived

gaps left even if the Montreux Document and ICoC are considered together (mainly resulting from the organic development of both instruments) in terms of scopes of application (e.g. with regard to PSC operating environments), remedies / accountability, wider and non-Western membership). The interviewees acknowledged that DCAF had undertaken work in these areas and that now a certain prioritising of activities might be necessary.

Internal coherence: Are the MoU's 'personnel support' and 'administrative support' activities relevant to the project's immediate objectives? Are the MoU's 'functional support' and 'other' activities relevant to project medium-term objectives?

Stakeholders commented very positively on progress made by ICoCA since 2015, noting the considerably enhanced operationalisation of the different core functions to support their positive views. The few stakeholders with critical views on ICoC/A (e.g. some PSCs considered CSOs to enjoy too prominent a role), nonetheless acknowledged the progress made in the course of the last two years. However, whilst overall feedback was largely positive, most stakeholders considered that they lacked sufficient knowledge of the project and the respective roles of ICoCA and DCAF, and what had been undertaken by DCAF within the project and outside the project.

Added value

Stakeholders considered DCAF to add substantial value within the project. Different aspects of DCAF added value were noted:

- DCAF's nature (expert NGO, non-partisan, not a stakeholder) was considered to make it an ideal actor to support the Swiss Initiative and ICoCA, specifically considering the nature of the initiative with its multi-stakeholder aspect;
- DCAF's approach (availability and flexibility) ensured ICoCA's continuity;
- One of DCAF's main contribution was considered to consist in operationalising the normative framework set up by the Swiss Initiative (the Montreux Document and ICoC), thus adding an aspect of 'practicality' and translating international law into practice;
- Moreover, stakeholders considered DCAF's capacity to monitor and follow emerging developments in the private security sector, assess its impact for the normative framework and share and inform about these insights as crucial.

Stakeholders also considered DCAF to add substantial value outside the project (see Exhibit 6 in 'Annex 5 – Data collection on relevance'). Most notably, DCAF outside the project made a substantial contribution to the MoU sub-categories 'Promotion of the ICoC/A (outreach / partnerships)', 'Promotion / interaction on the

Montreux Document Forum', 'Promotion of ICoC/A in framework of DCAF work on private security governance' and 'Consultation on tools and additional guidance'.

Stakeholders perceived DCAF as 'politically neutral' (e.g. DCAF's Foundation Council counts 62 member states) and well resourced actor (capacities / networks). It was therefore considered that DCAF can approach governments more easily than ICoCA with a view to working with governments, e.g. to adopt certification requirements.

Moreover, several stakeholders pointed to the 'think tank' nature of DCAF, with its in-house research capacities considered at 'academic' level; examples included the research on best practices in the area of contracting PSCs, or the research inspiring the guidelines on PSCs handling complaints.

DCAF was also considered to add value via its contacts and networks; and in this context, it was also noted that DCAF had capacities on the ground that can be mobilised to support ICoCA (e.g. regional offices in Brussels, Beirut, Ljubljana, Tunis and Ramallah). Finally, DCAF was considered to add value with its organisational experience, i.e. supporting ICoCA on human resource, finance and other organisational issues.

Relevance: Did DCAF's support to the ICoCA address specific and important needs during the period and is it likely its support will help meet needs of the Association in the future?

Stakeholders strongly agreed on the project addressing needs (see detail below), specifically emphasising the need of operationalising the 'spirit' of the Montreux Document, the Voluntary Principles and the ICoC. CSO feedback stressed the importance of achieving genuine accountability with a focus on binding and enforceable commitments of PSCs via the development of ICoCA's three core functions.

Moreover, stakeholders noted a series of emerging needs, agreeing that future project support, involving DCAF, would be well positioned to address these needs. In general terms, DCAF was considered very receptive to new ideas with responsive follow-up with relevant stakeholders, e.g. on procurement research or the complaints function.

Further emerging needs include:

- A remaining question is related to possible overlapping or distinct scopes of application of the Montreux Document and ICoC (leaving a gap) resulting from the fact of addressing different actors (military and/or security providers) and situations (conduct of hostilities, complex environments, etc.). Most notably, the concept of 'complex environment' i.e. whether ICoCA's focus should be exclusively on high risk areas was questioned, considering that the same governance / human rights issues might also be

of relevance for PSCs operating in 'problematic' (urban) areas in general terms;

- The need for an enlarged, non-Western membership within ICoCA;
- The issue of new clients (especially: humanitarian sector), new types of security services (especially: cyber security services), new objects to be protected (especially: hospitals, refugee/asylum seeker infrastructure, ships), 'new' horizontal issues such as gender;
- Focus on smaller companies; related to this: tension between localisation and certification (local and smaller companies shall be given priority but face difficulties to access certification by accredited third parties, i.e. certifying bodies who can provide certification on ICoCA recognised standards such as PSC1, ISO 18788 and ISO PAS 28007);
- The issue of arming of private contractors (small arms, non-lethal arms);
- The need for a more integrated discussion of the various initiatives (MD, ICoC, Voluntary Principles).

Overall, DCAF was considered, currently, to be in a better position than ICoCA to address the above noted emerging needs, notably because of its nature (impartiality) and resources (experience, expertise, information, vast network), with a future gradual transfer of responsibilities to ICoCA staff members.

Finally, one stakeholder considered that in the future it would be desirable for DCAF to act as an observer to the Intergovernmental Working Group tasked with the possible elaboration of a voluntary regulatory framework on PSCs;¹³ DCAF is considered a respected interlocutor and would represent a valuable resource for stakeholders.

2.2. Effectiveness

Has the project achieved its immediate objectives (strengthened ICoCA capacities)?

Government stakeholders strongly agreed on the project having delivered on its immediate objectives, i.e. the project was considered to have been of key importance in operationalising ICoCA. CSO stakeholders also noted substantial progress in terms of the operationalisation of the different ICoCA functions, comparing the situation at the project start in 2015 with the current situation, and emphasising the development of standards. Finally, PSCs agreed on the progress

¹³ 'Open-ended intergovernmental working group to consider the possibility of elaborating an international regulatory framework on the regulation, monitoring and oversight of the activities of private military and security companies'

<http://www.ohchr.org/EN/HRBodies/HRC/WGMilitary/Pages/OEIWGMilitaryIndex.aspx>

made since the start of the project, however, they were, generally, somewhat more critical in terms of ICoCA efficiency.

Data facilitated by DCAF (see Exhibit 7 in Annex 6) confirms the project's substantial contribution to both, organisational and functional aspects of ICoCA.

Looking first at the **organisational aspects**, the project proved key to transforming ICoCA into a fully operational organisation:

- Whilst some of the elements relating to ICoCA's governance were already in place prior to the project (e.g. the forms for ICoCA membership or observer applications were all operational in 2014), two important aspects became operational in 2015/2016 (facilitated by the Programme Officer), namely the Policy for Observer Fees and the Industry Membership Dues Invoicing Policy and Procedure.
- The project also contributed to the development of other organisational aspects, mostly facilitated by the Interim Director, e.g.:
 - there was progress with the development of ICoCA's human resource policy with adoption in the last quarter of 2017;
 - the project also contributed to IT and data protection (adopted in 2015, amended in 2016);
 - the project initiated work on key performance indicators, starting with the development of an employment performance framework in 2017 following the Results Based Management approach;
 - the project prepared guidelines on procurement, and these were included in Article 13 of the Financial Regulations which were adopted by the Board in summer 2017;
 - Finally, the project also made an important contribution to ICoCA financial management and reporting (i.e. the 2014-2015, 2015-2016 and 2016-2017 Annual Reports).

Turning now to the **functional aspects**, i.e. ICoCA's core functions of certification, monitoring and complaints, again the project can be credited with important contributions.

- With regard to the certification function, the project period saw the finalisation / operationalisation, mostly facilitated by the Project Officer and Project Coordinator, of a series of elements, including:
 - In 2015: the 'Article 11 Procedure – Certification' and the 'Recognition Statement for ANSI/ASIS PSC.1-2012';
 - In 2016: the 'Comments on Draft ICoCA Recognition Statement for ISO 28007-1', the 'Recognition Statement for ISO 28007', the 'Draft

Recognition Statement for ISO 18788', the 'Recognition Statement for ISO 18788', the 'Application Form & Guidance - ICoCA Certification Process for PSC.1 certified companies', the 'Application Form & Guidance - ICoCA Certification Process for ISO 18788 certified companies' and the 'Application Form & Guidance - ICoCA Certification Process for ISO 28007 certified companies'.

- Concerning the monitoring function, project support provided via the Programme Officer allowed for the adoption, in 2016, of the 'Article 12 Procedure – Reporting, monitoring and assessing performance and compliance'.
- With regard to the complaints function, project support provided by the Interim Director and Project Coordinator allowed for the adoption, in 2016, of the 'Article 13 Procedure – Receiving and processing complaints', and in 2017, of the 'ICoCA Complaints Form', whilst the 'ICoCA Guidance for companies on grievance procedures' was further developed.

Finally, in the context of discussing effectiveness, stakeholder feedback suggested substantial difficulties in terms of differentiating between the project and other ICoCA and / or DCAF activity. This was not reported to have any negative implications for the project. However, with a view to future support for the project it might be worth considering more visible 'branding' of the project. Donors tend to have an interest in visibility, and being able to clearly identify the project with FDFA support might also attract other donors to commit to funding. A clear identification of the project might also imply benefits in terms of accountability (see Recommendation 3: 'Communicate the Swiss Initiative').

ICoCA core functions

The Secretariat was considered to have become more efficient in terms of dealing with certification, e.g. it takes less time for the Secretariat to proceed with a certification, however, feedback did not allow to differentiate clearly between the respective roles of DCAF and ICoCA in this. Notwithstanding, stakeholders suggested that there was room for improvement, emphasising the need for certification to become more responsive. It was also recommended to further investigate into the PSC's time requirements for certification.

Stakeholders considered the monitoring and complaints functions to require a stronger involvement of CSOs, and DCAF was considered well positioned to promote this, drawing on its networks; stakeholders also considered that in this context, DCAF could provide capacity development for CSOs, e.g. to enhance the understanding of the complaints function (see Recommendation 6: 'Develop CSO monitoring and complaints capacities').

One stakeholder commented positively on the 'piloting' approach to monitoring, developing this function in an iterative way. Finally, stakeholders noted their hope for the Private Security Governance Observatory to complement ICoCA monitoring.

Outreach

With regard to outreach, it appears that there was no joint ICoCA / DCAF planning document or work programme detailing scheduled activities. Whilst this was viewed in terms of 'positive overlap', a more structured approach might help ensuring that all opportunities for outreach are seized. The very fluid communication between ICoCA and DCAF already contributed to this during the course of the project; and ICoCA is now envisaging a more structured approach to cooperation (e.g. taking the form of quarterly strategy meetings and regular working meetings) (see Recommendation 8: '**Joint programming of outreach**').

In the context of discussing outreach, several stakeholders raised the issue of CSO membership. ICoCA's current 22 CSO members are from the United States, Nigeria (both with five CSOs); Congo, Peru (both with two CSOs); and the United Kingdom, Colombia, Senegal, Niger, South Africa, Rwanda, Kenya, China (all with one CSO). Stakeholders considered CSO members from the United States to play a prominent role, with some difficulties to attract members from conflict regions; the Private Security Governance Observatory is hoped to mitigate this.

Generally, the need for a stronger CSO engagement was noted; the number of 22 CSOs considered small in the face of the challenges posed by the monitoring and complaints functions; it was noted that efforts are underway to promote the engagement of CSOs from the Nordic countries. However, more important than the number, some CSO stakeholders considered that there is a need for a better definition and development of their role in ICoCA (see Recommendation 7: '**Strengthen CSO membership**').

2.3. Impact

Has the project achieved its medium-term objectives (enhanced ICoCA performance in terms of certification, monitoring and complaints)?

First an introductory comment: Feedback at inception and draft reporting stage suggested doubts over the 'legitimacy' of questions on impact. Following standard OECD evaluation methodology, this evaluation has defined:

- Evaluation questions on the project's immediate effects, as related to the evaluation criterion of effectiveness; here the question is whether the project has led to any immediate change in terms of ICoCA's enhanced organisational capacities, englobing organisational and functional activities (the latter relating to the preparation / operationalisation of the certification, monitoring and complaints functions);

- Evaluation questions on the project's medium term effects, as related to the evaluation criterion of impact; here the question is whether any changes can be observed in terms of the actual delivery of ICoCA's functional activities of certification, monitoring and complaints.

Certification

Looking first at the current situation with certification, at the end of October 2017 there are 101 member PSCs; 30 new PSCs have applied for membership and 20 have been accepted. About 10% of the current PSC members has completed certification. The October 2017 Annual General Assembly adopted a 'transitional membership status' considering it impossible to certify all members, as initially planned, by September 2018; as of April 2018, all ICoCA members will have two years to complete certification.

In general terms, it is still early to 'judge' impact; the monitoring and complaints functions have only been adopted recently with limited practical experience concerning ICoCA's performance with the delivery of these functions. CSO stakeholders noted that the conditions for impact were now in place (in terms of documents and processes), however, it still remained to be seen to what extent ICoCA will be able to deliver the three functions in line with expectations. Stakeholders expected that first insights will be available as soon as the monitoring and complaints functions become fully operational.

With regard to certification, stakeholders considered a key question to be who can provide certification. It was noted that some certifiers claim that accrediting other third party certifying bodies might negatively affect standards. On the other hand, allowing more actors to provide certification might make it easier to contract local PSCs. Indeed, one stakeholder pointed to the following dilemma: if extracting companies are doing business abroad and consider hiring a security company, they may face the dilemma between contracting local companies, which are regularly not certified, and contracting (mostly Western) certified companies. Hence, there is a tension between localisation and certification.

It was also noted that PSCs from French- and Spanish-speaking countries challenge the requirement for translation of documentation into English; PSCs in some regions have limited access to certifiers or fear the cost of certification, and this might be a valid claim. However, stakeholders also noted that there were examples of PSCs with limited resources successfully obtaining certification, e.g. PSCs from Iraq or Pakistan. Other stakeholders asked how many PSCs were actually affected by the 'language barrier', considering that the key issue might not be language, but rather the missing incentive to certify. Some stakeholders principally supported a 'bi-lingual approach', noting at the same time the lack of concrete evidence suggesting a language barrier. It was considered that DCAF might be well positioned to engage with certifying bodies in French- and Spanish speaking regions to promote accreditation (see Recommendation 9: 'Assess the language

barrier'), however, it was also considered that this might stretch the mandate of DCAF. Other stakeholders saw a possible risk in ICoCA engaging in accreditation of certifiers (due to capacity constraints).

One CSO stakeholder recommended the translation of relevant ICoCA documentation into Chinese and offered to support this process.¹⁴

Finally, the question was raised as to whether ICoCA is not trying to do too much by providing certification; perhaps more could be achieved by working in partnership with certifiers.

Stakeholders unanimously stressed that governments (and most notably the ICoCA government members) have an important role in terms of motivating PSC certification; suggesting that this could be achieved by procurement and other legislation, or 'soft-law' initiatives (see Recommendation 10: '**Incentivise ICoCA membership**').

Examples include:

- Swiss Federal Act on Private Security Services provided Abroad requiring for Swiss-based PSC operating abroad to become signatory to the ICoC and to declare accession to the ICoC to the competent authority;
- United States Department of State / Department of Defense requirements;
- Canadian procurement practices allocating extra points for tenderers with ICoCA membership; in this context, it was noted that legislation would constrain procurement since some regions where services are procured have only few ICoCA members;
- Sweden requires ICoCA membership in the context of international contracts for PSC services to protect missions in high risk countries; there are ongoing considerations to gradually extend requirements to local companies, e.g. first alerting local companies to ICoC standards and later requiring membership in ICoCA;
- Australia does not require the PSCs it contracts to be ICoCA members, however, compliance with the ICoC is required.
- Finally, a European Parliament resolution of summer 2017 reportedly also promotes compliance with standards.

Some government stakeholders agreed on the necessity of governments requiring certification, however, there were also hesitations, to some extent of a legal nature,

¹⁴ Note that the ICoC is available in eight languages, including Arabic, Chinese, Dari, English, French, German, Russian and Spanish.

i.e. would it be legally valid to require ICoCA membership to participate in procurement, effectively increasing the cost of participating in procurement.

Stakeholders voiced the view that governments in countries 'receiving PSCs' (e.g. Iraq, Afghanistan, Nigeria) should engage more strongly with ICoCA in terms of introducing requirements for ICoCA certification. Notwithstanding, some PSC feedback suggested some level of 'consciousness' of standards in countries receiving PSCs, e.g. it was noted that it was difficult to operate in Iraq outside existing standards. In this context, the important role of DCAF in terms of motivating countries to require certification was recognised (see Recommendation 10: '**Incentivise ICoCA membership**').

Finally, PSC feedback supported the argument that without governments requiring certification, there would be no strong incentive to join ICoCA; in this context it was noted that PSCs are well aware of government procurement requirements (see recommendations). CSOs note the expectation for more countries to join ICoCA, following prior adherence to the Montreux Document and Voluntary Principles.

Along similar lines as for governments requiring ICoCA membership, stakeholders also considered that private sector clients, e.g. insurance or financial sector companies should play a more important role in terms of requiring certification. For example, Phillip Morris requires ICoCA membership in the context of its contracting requirements (see Recommendation 10: '**Incentivise ICoCA membership**').

Whilst ICoCA was considered to have achieved outcomes with regard to certification, stakeholders considered that more was required in terms of engaging with PSCs to build their capacities, noting doubts as to whether certification was really having a genuine impact on the ground (see Recommendation 11: '**Develop PSC capacities**'). Stakeholders considered that ICoCA might lack the resources to engage in capacity development, however, this could be promoted in partnership, including with DCAF; for example, the UK is supporting DCAF via a Trust Fund to build CSO capacities in Africa.

Monitoring and Complaints

CSO stakeholders emphasised the importance of the monitoring and complaints functions, as these were expected to demonstrate the genuine achievement of enhanced PSC standards in terms of respect of human rights and governance. In this context, it was noted that, in the future, the monitoring function was likely to require substantial resources in the light of the increasing number of certified companies, and it was questioned whether ICoCA was sufficiently prepared for this. CSOs also noted their role in terms of contributing to effective monitoring, e.g. by contributing with methodological support (a specific example included monitoring sensitive of multi-ethnic societies) and by pointing the monitors to specific areas and regions affected by higher risks of compliance issues (see Recommendation 6: '**Develop CSO monitoring and complaints capacities**'). it was also noted that, in the future, monitoring could be conducted exclusively by local NGOs.

Some of the PSC feedback suggested a critical perception of the monitoring (and complaints) function; to some extent this might be explained by limited understanding of the monitoring function, e.g. one PSC considered the monitoring to constitute a duplication of the certification function.

Unexpected outcomes

One stakeholder noted that an Intergovernmental Group (hosted by the UNHCR) had been debating for five years the possible introduction of a binding instrument on PSCs; only the reference to the work of ICoCA unblocked the discussions allowing for a shift (in 2017) from the idea of preparing a treaty to elaborating a voluntary regulatory framework on PSC; convincing 'sceptics' of ICoCA from countries where PSCs operate. Notwithstanding, one stakeholder saw a risk; whilst condoning the ICoCA-related work done by DCAF under the auspices of the Swiss Initiative, a comprehensive non-binding set of rules may complicate the enactment of binding rules, considering that some states take a contrary position: that the combination of Montreux and ICoC/ICoCA obviate the need for binding international regulation. While the FDFA's promotion of these processes was welcome, there was also concern that their success could be used as a smokescreen against the need for regulation. For this reason, what may be seen as success in the promotion of Montreux and ICoC/ICoCA, may, in fact, be counterproductive to the ultimate goal of protecting human rights.

Stakeholders also noted an unexpected outcome in terms of CSO capacity development. Indeed, the Annual General Assembly allowed for separate meetings for each of the three stakeholder pillars, and in this context, CSOs were able to exchange experiences. Similarly, it was reported that exchanges between CSOs now take place locally; and that CSOs have developed their understanding of international standards. Finally, CSO stakeholders considered that there was potential for further developing communication between CSOs, and also between CSOs and PSCs; a CSO communication platform and the ICoCA newsletter could facilitate this, and so could the establishment of local CSO working groups (see Recommendation 12: 'Support CSO communication'), addressing the perceived distance between Geneva and some of the locations with higher numbers of ICoCA members. Moreover, CSO stakeholders considered the project to develop trust between the different stakeholder pillars, most notably between the CSO and PSC pillars; this was facilitated by the opportunities for exchanges in the context of the Annual General Assembly.

One CSO stakeholder pointed to the unexpected positive outcome of ICoCA enhancing conceptual clarity in terms of the difference between PSCs and public sector security providers, noting that the difference was not always clear in Nigeria where community-based security outfits collaborate informally with police.

2.4. Efficiency

Are project structure and processes suitable to implement project activities?

In general terms, DCAF's highly efficient support in terms of facilitating ICoCA activity was acknowledged, however, it was also noted that it was not always clear whether support was provided in the context of the project. CSO and PSC stakeholders commented positively on structures and processes, however, due to the stakeholders' limited understanding of the difference between the project, DCAF and ICoCA, it is difficult to attribute the feedback specifically to the project.

Response to unexpected departure of first Executive Director

The response to the unexpected departure of ICoCA's first Executive Director was considered efficient – i.e. taking the form of DCAF's flexibility and very quick mobilisation of an interim director. In this context, the good handover between the Interim Director and the recently appointed new Executive Director, starting on 1 October 2017, was noted. The departure of the first Executive Director did cause a difficult transition with the need for the ICoCA Board of Directors to assume different functions, e.g. human resources, including recruitment.

Project reporting / access to ICoCA information

Stakeholders commented very positively on the easy access to information via ICoCA and / or DCAF. However, it was also considered that project reporting could be further improved by including a stronger focus on objectives and progress made towards achieving objectives. Indeed, as already noted in the introduction the existing project reports present lists of activities, however, this fails to include any qualitative or quantitative monitoring data allowing for an assessment of the extent to which objectives are being achieved (see Recommendation 13: 'Enhance project reporting').¹⁵

Governance arrangements

The multi-stakeholder approach was considered a success; whilst there are conflicts between the representatives of the three different pillars, when consensus is reached this was considered to be of a particularly solid nature. Whilst CSOs and governments did not question the multi-stakeholder approach, some PSCs did, questioning the value added of CSOs, considering that the presence of CSOs negatively affected efficiency, and that they have too strong a voice in the decision-making.

Stakeholders recommended considering more structured exchanges between ICoCA, DCAF and board members; this could take the form of regular

¹⁵ DCAF, Project: The International Code of Conduct Association – Implementation Support and Promotion (1 October 2015 – 30 September 2016) Project Number (Swiss FDFA): 632243, Operational Report A, 30 November 2016

'brainstorming' meetings (see Recommendation 14: '**Strengthen 'internal' communication'**).

One CSO stakeholder recommended organising the board in thematic groups, emphasising the need to address issues such as humanitarian response and early warning.

2.5. Sustainability

To what extent has ICoCA developed resilience vis-à-vis a discontinuation of DCAF support?

Government stakeholders voiced very strong support for a continuation of project activities, however, generally, failing to differentiate between the 'source' of support (the project, DCAF, ICoCA); most stakeholders noted the hope of DCAF involvement to continue; and for the FDFA to maintain funding. Some stakeholders considered that ICoCA might now be able to 'stand on its own feet', however, not in terms of impact, where the 'partnership' with DCAF was considered vital, not least because of the perception of DCAF as a neutral actor. Stakeholders also considered that a continuation of government funding would ensure that governments have leverage in ICoCA, though it was recognised that in the medium-term, most funding should be provided by PSCs. In this context, one stakeholder noted in-kind support to ICoCA in terms of facilitating some of ICoCA's outreach activity as an alternative to financial contributions (Canada is providing this type of support) (see Recommendation 15: '**Promote in-kind support'**).

CSO stakeholders clearly perceived a need for the continuation of DCAF support for ICoCA, and this also suggests that CSO stakeholders are well familiar with DCAF; CSO and PSC stakeholders also referred to the desirability of a continuation of FDFA funding.

Finally, stakeholders noted that one possibility for sustainability would be to move to covering ICoCA operating costs to 100% with membership fees; with government funding to kick-start new initiatives, packaged as specific projects, e.g. to address new needs. In this context, it was noted that a medium-term strategy for financial sustainability was required, and the new Executive Director had been tasked to develop this (see Recommendation 16: '**Research on funding models'**). PSC stakeholders considered that the key to long-term sustainability related to governments requiring ICoCA membership.

3.Recommendations

Drawing on the evaluation findings, this section presents the recommendations. This section responds to the evaluation's formative perspective, i.e. enhancing performance with a view to the future.

Exhibit 2 – Recommendations

Evaluation criterion	Finding	Recommendation (the target audience for the recommendation is noted in brackets)
Horizontal	Evaluations build on pre-defined theories of change, logical frameworks, including baselines, targets, and quantitative and qualitative indicators to allow for a measurement of the extent to which operational objectives, immediate objectives, and to a lesser extent, medium term objectives are being achieved. The project did not operate an explicit logical framework, and there was no collection and documentation of monitoring data. The existing project reports present lists of activities, however, there was no qualitative or quantitative monitoring data allowing for an assessment of the extent to which objectives were being achieved.	1) Monitor performance: On the basis of the existing theory of change, develop a logical framework, including baselines and targets and define qualitative and quantitative indicators. With regard to ICoCA organisational aspects, this can draw on the extensive literature on, and experience with 'Key Performance Indicators'. Moreover, ICoCA could consider the regular conduct of customer satisfaction / stakeholder engagement surveys (DCAF and ICoCA).
	Several stakeholders noted their limited knowledge about 'the project', and were not able to differentiate between activities supported by the project and other related ICoCA and / or DCAF activities.	2) Strengthen visibility: With a view to future project phases it might be worth considering a more visible 'branding' of the project. Donors tend to have an interest in visibility, and being able to clearly identify the project with FDFA support might also attract other donors to commit to funding. A clear identification of the project might also imply benefits in terms of accountability (DCAF and ICoCA).
Relevance	Stakeholders noted that the Swiss Initiative is not supported by any dedicated (government or other) strategy document, i.e. a strategy document specifically dealing with the Swiss Initiative, setting out the objectives of and relationships between the Montreux Document, the Voluntary Principles and ICoC/A, and addressed to all stakeholders including governments, CSOs and PSCs. Most notably CSOs and PSCs struggled to situate ICoC/A in its wider policy context.	3) Communicate the Swiss Initiative: Consider the development of a strategy document outlining the objectives of different initiatives (Montreux Document, Voluntary Principles, ICoC/A) and their relationships between each other, ideally in a language accessible to all stakeholders, including governments, CSOs and PSCs (FDFA).

Evaluation criterion	Finding	Recommendation (the target audience for the recommendation is noted in brackets)
	Under the Montreux Document Forum, the ICoCA Working Group has been meeting twice a year. The Working Group has experienced a prominent role of ICoCA member governments.	4) Intensify the dialogue between the Montreux Document and ICoCA: With ICoCA now fully operational there might be room to intensify the Working Group's engagement with ICoCA, e.g. via more frequent meetings. Consider attracting non-ICoCA members to assume a more prominent role in leading the Working Group to promote the engagement of Montreux Document members (not already members of ICoCA) (FDFA).
	There might be room for ICoCA to benefit from the experience that the Voluntary Principles have gathered over the years in terms of engaging with the private sector.	5) Assess potential to benefit from the experience of the Voluntary Principles: Consider establishing a structured exchange with OHCHR and UNLIREC to review experiences of engaging with private sector stakeholders (DCAF and ICoCA).
Effectiveness	In the future, the monitoring and complaints functions are likely to require substantial resources in the light of the increasing number of certified companies. CSOs noted their role in terms of contributing to effective monitoring, e.g. by contributing with methodological support and by pointing the monitors to specific areas and regions affected by higher risks of compliance issues. DCAF was considered well positioned to promote CSO involvement, drawing on its networks; stakeholders also considered that in this context, DCAF could provide capacity development for CSOs, e.g. to enhance the understanding of the complaints function.	6) Develop CSO monitoring and complaints capacities: Consider the possibility of future project support for the capacity development of CSOs, ideally in cooperation between ICoCA, DCAF and CSOs experienced in the provision of capacity development for other CSOs (FDFA, DCAF and ICoCA).
	Generally, the need for a stronger CSO engagement was noted; the number of 22 CSOs was considered small in the face of the challenges posed by the monitoring and complaints functions; more important than the number, some CSO stakeholders	7) Strengthen CSO membership: Consider addressing the issue of CSO membership and role by directly engaging in a structured dialogue with leading CSOs in regions witnessing the operation of PSCs. The dialogue could take the form of a

Evaluation criterion	Finding	Recommendation (the target audience for the recommendation is noted in brackets)
	<p>considered that there is a need for a better definition and development of their role in ICoCA.</p> <p>With regard to outreach, it appears that there was no joint ICoCA / DCAF planning document or work programme detailing scheduled activities.</p>	<p>working group of CSO representatives (including ICoCA members and non-members). The project could support this by conducting research on the role of CSOs in other multi-stakeholder initiatives (e.g. some of the European Union Agencies include governance arrangements involving CSOs) (DCAF and ICoCA).</p> <p>8) Joint programming of outreach: A more structured approach might help ensuring that all opportunities for outreach are seized. The very fluid communication between ICoCA and DCAF already contributed to this during the course of the project; and ICoCA is now envisaging a more structured approach to cooperation (e.g. taking the form of quarterly strategy meetings, regular working meetings) (DCAF and ICoCA).</p>
Impact	<p>Stakeholders noted that PSCs from French- and Spanish-speaking countries challenged the requirement for translation of documentation into English, noting additional costs. However, stakeholders also noted limited evidence regarding the 'language barrier'.</p> <p>Stakeholders stressed that governments have an important role in terms of motivating PSC certification, suggesting that this could be achieved by procurement and other legislation, or 'soft-law' initiatives. Similarly, stakeholders also considered that private sector clients, e.g. insurance or financial sector companies should play a more important role in terms of requiring certification.</p>	<p>9) Assess the language barrier: Consider tasking DCAF with engaging with certifying bodies in French- and Spanish speaking regions to collect evidence on the scope of the language barrier. On the basis of the findings, initiate a discussion on the use of French / Spanish in certification (DCAF).</p> <p>10) Incentivise ICoCA membership: Consider tasking DCAF with the preparation of background research on the different government and private sector client initiatives to incentivise certification (including research on the effectiveness of these initiatives); engage in a dialogue with governments and private sector clients for the dissemination and promotion of identified 'good practices' (DCAF).</p>
	Stakeholders suggested that some PSCs might benefit of capacity	11) Develop PSC capacities: Further to ICoCA monitoring

Evaluation criterion	Finding	Recommendation (the target audience for the recommendation is noted in brackets)
	development to ensure the genuine application of the ICoC on the ground.	efforts, consider the development of ongoing capacity development opportunities for certified PSCs (DCAF and ICoCA).
	Stakeholders noted an unexpected outcome in terms of CSO capacity development. The Annual General Assembly allowed for separate meetings for each of the three stakeholder pillars, and in this context, CSOs were able to exchange experiences. Similarly, it was reported that exchanges between CSOs now take place locally; and that CSOs have developed their understanding of international standards. Finally, CSO stakeholders considered that there was potential for further developing communication between CSOs, and also between CSOs and PSCs;	12) Support CSO communication: A CSO communication platform and the ICoCA newsletter could facilitate exchanges between CSOs, and so could the establishment of local CSO working groups, addressing the perceived distance between Geneva and some of the locations with higher numbers of ICoCA members. DCAF would be well positioned to engage in an exchange with leading CSOs in regions experiencing the deployment of PSCs to promote communication (DCAF and ICoCA).
Efficiency	Stakeholders considered that project reporting could be further improved.	13) Enhance project reporting: Project reporting to include a stronger focus on objectives and progress made towards achieving objectives. Indeed, the existing project reports present lists of activities, however, this fails to include any qualitative or quantitative monitoring data allowing for an assessment of the extent to which objectives are being achieved (DCAF and ICoCA).
	Stakeholders recommended considering more structured exchanges involving ICoCA (Secretariat and board members) and DCAF.	14) Strengthen 'internal' communication: Consider the organisation of regular 'brainstorming' meetings to discuss specific topics, e.g. emerging needs (FDFA, DCAF and ICoCA).
Sustainability	Stakeholders considered that a continuation of government funding would ensure that governments have leverage in ICoCA, though it was recognised that in the medium-term, most funding should be provided by PSCs. In this context, one stakeholder noted in-kind support to ICoCA in terms of facilitating some of ICoCA's outreach activity as an alternative to financial	15) Promote in-kind support: Consider reviewing the experience with in-kind support and engage with government members to promote the provision of in-kind support when financial support is not feasible (FDFA).

Evaluation criterion	Finding	Recommendation (the target audience for the recommendation is noted in brackets)
	<p>contributions.</p> <p>It was noted that a medium-term strategy for financial sustainability was required, and that the new Executive Director had been tasked to develop this.</p>	<p>16) Research on funding models: Consider tasking DCAF with the preparation of background research on funding arrangements for similar multi-stakeholder initiatives (DCAF).</p>

Annex 1 - Documentation

The following documentation was consulted for the preparation of this report:¹⁶

ICoCA, Articles of Association, February 2013

DCAF, Towards an International Code of Conduct for Private Security Providers: A View from Inside a Multistakeholder Process, 2015

Memorandum of Understanding between The International Code of Conduct for Private Security Service Providers' Association (ICoCA) and The Geneva Center for the Democratic Control of Armed Forces (DCAF), 14 October 2015

FDFA, Demande de Crédit, 18 September 2015

FDFA, RAPPORT D'AUTO-ÉVALUATION DSH, 8 January 2016

Addendum 1 to the Memorandum of Understanding between The International Code of Conduct for Private Security Service Providers' Association (ICoCA) and The Geneva Centre for the Democratic Control of Armed Forces (DCAF), 26 September 2016

DCAF, Project: The International Code of Conduct Association – Implementation Support and Promotion (1 October 2015 – 30 September 2016) Project Number (Swiss FDFA): 632243, Operational Report A, 30 November 2016

ICoCA, Back to office report, Voluntary Principles on Security and Human Rights, March 2017

DCAF, European Inter-Agency Security Forum, Mission Report, March 2017

ICoCA, Q1 2017 Board Meeting Geneva, Switzerland 28 & 29 March 2017 Minutes

DCAF, Security and Human Rights in Complex Environments Workshop, Mission Report, May 2017

ICoCA, Back to office report, Meeting with Board Members of the International Security Managers Association, June 2017

Contract amendment, 25 July 2017

¹⁶ FDFA facilitated documentation on 10 and 11 October, and DCAF on 13 October 2017. The evaluator also reviewed information available on the ICoCA website (<https://icoca.ch/en>).

DCAF, DCAF support to the implementation of the International Code of Conduct (ICoC) and to the ICoC Association in Latin American and the Caribbean, dated October 2017

DCAF, The International Code of Conduct Association, Implementation Support and Promotion, Draft Discussion Paper – Phase V, not dated

DCAF, DCAF PPP activity in SEE, not dated

Annex 2 - Consultations

Exhibit 3 lists the stakeholders consulted.

Exhibit 3 – Stakeholder consultations

Name	Organisation
Mr Rémy Friedmann	Senior Advisor, Desk Human Security and Business Human Security Division, Deputy Head, Human Rights Policy Section, FDFA
Mr Jonathan Cuénoud	International Public Law Directorate, FDFA
Ms Martina Gasser	Private Security Section, FDFA
Mr Alan Bryden	Assistant Director and Head of Public-Private Partnerships Division, DCAF
Ms Anne-Marie Buzatu	Deputy Head, Public-Private Partnerships Division, DCAF
Ms Nelleke van Amstel	Project Coordinator, Public-Private Partnerships Division, DCAF
Ms Anna Marie Burzdy	Montreux Document Forum (DCAF)
Ms Lena Wendland	UN Forum on Business and Human Rights, OHCHR
Mr Gabor Rona	UN Working Group on the Use of Mercenaries
Mr Claude Voillat	International Committee of the Red Cross
Ms Melanie Régimbal	UNLIREC
Mr Jorge Perez-Lopez	Fair Labour Association
Mr Jamie Williamson	Executive Director, ICoCA
Ms Katherine Gorove	US (ICoCA member / Board of Directors)
Ms Joanna Vallat	UK (ICoCA member / Board of Directors)
Ms Lorraine Anderson	CA (ICoCA member)
Mr Jonas Westerlund	SE (ICoCA member / Board of Directors)
Mr Hugh Watson	AU (ICoCA member)
Mr Scott Ramsay	Al Hurea Security Services (ICoCA certified)
Mr Andrew Farqhar	Garda World (ICoCA member)
Mr Chris Sanderson	Control Risks (ICoCA member)

Mr Graham Kerr	Hart Security Limited (ICoCA member)
Ms Sylvia White	Aegis Defence Services Limited (ICoCA member)
Mr Michael Posner	NYU's Stern School of Business (ICoCA Board of Directors)
Ms Josephine Alabi	Keen and Care Initiative (ICoCA member)
Mr Zanggui Zhou	Institute for Overseas Safety and Security (ICoCA member)
Mr Carlos Salazar Couto	Socios Péru: Centro de Colaboración Cívica (ICoCA member)
Mr Amol Mehra	International Corporate Accountability Roundtable (ICoCA Board of Directors)
Ms Aly Marie Sagne	Lumière Synergie Développement (ICoCA member)
Mr Caleb Wanga	Usalama Reforms Forum (ICoCA member)
Mr Saviour Akpan Esq	Community Policing Partners for Justice, Security and Democratic Reforms (ICoCA member)
Mr Olayide Adesanya	New Nigeria Foundation (ICoCA member)
Mr Joshua Loots	Centre for Human Rights (ICoCA member / Board of Directors)
	African Law Foundation (ICoCA member)

Annex 3 – Evaluation questions

Annex 3 presents the evaluation questions as revised in discussion with FDFA, DCAF and ICoCA during the initial briefing of 30 and 31 October 2017.

Exhibit 4 – Evaluation questions

Evaluation criterion	Evaluation question (EQ)	Comments	Evaluation Tool ¹⁷
Relevance, coherence (external and internal) and added value	<p>1) <i>External coherence: How does the project support the overall goals of the so-called ‘Swiss Initiative’?</i></p> <p>(In the context of analysing the findings for EQ1, we will also address the original ToR question: ‘How did the research on related topics, and outreach activities help to establish and facilitate synergies with related initiatives and stakeholders, such as the Montreux Document Forum and the Voluntary Principles on Security and Human Rights?’)</p>	<ul style="list-style-type: none"> EQ1 will look at how different activities under the wider framework of the Swiss Initiative relate and reinforce each other, aiming to identify the specific role of the project. For example, the project can be considered to relate to the Montreux Document by promoting the certification of PSCs.¹⁸ 	DR, I(w)
	<p>2) <i>Internal coherence: Are the MoU’s ‘personnel support’ and ‘administrative support’ activities relevant to the project’s immediate objectives?</i></p>	<ul style="list-style-type: none"> EQ2 will assess how the MoU’s ‘personnel support’ and ‘administrative support’ activities relate to the project immediate objectives of strengthening ICoCA organisational capacities. 	DR, I(n)
	<p>3) <i>Internal coherence: Are the MoU’s ‘functional support’ and ‘other’ activities relevant to project medium-term objectives?</i></p> <p>(In the context of analysing the findings for EQ 2 and 3, we will also address the original ToR</p>	<ul style="list-style-type: none"> EQ3 will assess how the MoU’s ‘functional support’ and ‘other’ activities relate to the project’s medium-term objectives of strengthening ICoCA core functions (certification, monitoring, complaints). See exhibit 4 for a first stock-taking of project activities. ICoCA membership could be a proxy indicator for the relevance of outreach activities;¹⁹ in this context it will be interesting 	DR, I(n)

¹⁷ DR: desk research, I(n): interviews (narrow: FDFA, DCAF, ICoCA), I(w): interviews (wide: all stakeholders identified in exhibit 2).

¹⁸ DCAF, Towards an International Code of Conduct for Private Security Providers: A View from Inside a Multistakeholder Process, 2015, p. 27.

¹⁹ 58 PSCs signed ICoC in 2010; by 2013, 708 PSCs had signed; as of 2013, PSCs are encouraged to join ICoCA. On 19 September, ICoCA counts 7 governments (6 joined in 2013, 1 in 2016), 101 PSCs (37 in 2013, 36 in 2015, 14 in 2016, 14 in 2017; out of which 9 ICoCA certified), 22 CSOs (12 joined in 2013, 1 in 2015, 5 in 2016, 4 in 2017).

Evaluation criterion	Evaluation question (EQ)	Comments	Evaluation Tool ¹⁷
	<i>question: 'Could the resources have been used in a more effective way to strengthen the ICoCA?')</i>	to assess the extent to which outreach has addressed a perceived North-South divide and attracted G77 members, ²⁰ and reached out to non-state clients. ²¹	
	<p>4)Added value: How do DCAF activities (that are not funded by the project) add value to the project?</p> <p><i>(In the context of analysing the findings for EQ 4, we will also address the original ToR question: 'In what way have DCAF's wider projects contributed to improved decision-making in the ICoCA?')</i></p>	<ul style="list-style-type: none"> EQ4 will review how DCAF activities (not covered by the project budget) contributed to promoting the achievement of medium-term objectives. This addresses the stakeholders' emphasis on the fact that a wide range of DCAF activities contribute to ICoCA's objectives.²² See exhibit 5 for a first stock-taking of relevant DCAF activities. 	I(n)
	<p>5)Relevance: Did DCAF's support to the ICoCA address specific and important needs during the period and is it likely its support will help meet needs of the Association in the future?</p> <p><i>(In the context of analysing the findings for EQ 5, we will also address the original ToR question: 'Has the project responded appropriately to the needs that arose out of the previous Executive Director's departure?')</i></p>	<ul style="list-style-type: none"> EQ5 reviews the alignment between ICoCA specific needs during 2015-2017 and the project response, specifically considering the changing nature of needs since the establishment of ICoCA, and expected future challenges, and with a specific focus on the needs caused by the departure of ICoCA's first Executive Director. 	I(w)
Effectiveness	<p>6)Has the project achieved its immediate objectives (strengthened ICoCA capacities)?</p> <p><i>(In the context of analysing the findings for EQ</i></p>	<ul style="list-style-type: none"> EQ6 will 'reconstruct' the baseline of ICoCA capacities as on 1 October 2015, and will compare this with capacities by 30 June 2017. The review will differentiate between two categories of capacities: (a) organisational capacities, such as human resources, 	DR

²⁰ DCAF, Towards an International Code of Conduct for Private Security Providers: A View from Inside a Multistakeholder Process, 2015, p. 30

²¹ DCAF, Towards an International Code of Conduct for Private Security Providers: A View from Inside a Multistakeholder Process, 2015, p. 54

²² Particular attention should be given to wider DCAF activities including mapping studies of the private security sectors in the Western Balkans and in Francophone Africa, strengthening oversight and promoting small arms control for the private security sector in the Latin American-Caribbean region, and providing tools and guidance to support to non-state clients of private security companies.

Evaluation criterion	Evaluation question (EQ)	Comments	Evaluation Tool ¹⁷
	6, we will also address the original ToR questions: 'How did DCAF's support allow ICoCA to operationalise the certification procedure and contribute to developing the monitoring and other functions of the oversight mechanism?', 'Has DCAF's high-level strategic support to the ICoCA helped to assist its Executive Director and Board of Directors to discharge their duties?' and 'How important to the continued viability of the Association was the secondment of a member of DCAF's senior management staff to serve as the Interim Executive Director after the Executive Director's departure?')	finance, IT and data protection, conflicts of interest, monitoring etc.; and (b) functional capacities, i.e. certification, monitoring and complaints. Exhibit 6 shows the template for this assessment.	
Impact	7)Has the project achieved its medium-term objectives (enhanced ICoCA performance in terms of certification, monitoring and complaints)? (This question addresses the original ToR question: 'How far did the support allow ICoCA to operationalize its members' certification procedure, contribute to developing its monitoring function, and support the development of the complaints procedure of the oversight mechanism?'. In the context of analysing the findings for EQ 7, we will also address the original ToR questions: 'Has DCAF support achieved its wider goals as described in the project proposal and discussion paper?' and 'Can you identify additional results that this project has achieved?')	<ul style="list-style-type: none"> • EQ7 will review ICoCA performance with regard to the three functional capacities, i.e. certification, monitoring and complaints. Looking specifically at the certification function, possible proxy indicators include: number of applications for ICoCA certification processed, duration of certification process, applicant feedback on the certification process (quality of documentation, ICoCA Secretariat guidance). 	DR, I(w)
Efficiency	8)Are project structure and processes suitable to implement project activities?	<ul style="list-style-type: none"> • EQ8 takes an interest in the project structure and processes (of cooperation between stakeholders). EQ8 will be answered on the basis of stakeholder feedback on satisfaction with / adequacy of 	DR, I(n)

Evaluation criterion	Evaluation question (EQ)	Comments	Evaluation Tool ¹⁷
	<p><i>This question addresses the original ToR questions of 'Is the structure of the project suitable to implement its activities?', 'How effective has cooperation mechanisms been to steer DCAF support and identify new cooperation opportunities (if they have proven to be ineffective, what were the reasons and what was done to address them)?', 'How was DCAF's offer of support requested, received, and used, by the ICoCA Executive Director, its Secretariat, and its Board?', 'Does it allow for the necessary flexibility?' and 'Should the structure be adapted for a possible new phase of the project beyond 2017?'</i></p>	<p>project structure and processes. Proxy indicators for adequacy of structures and processes include delivery of activities on schedule and in line with budget provisions.</p>	
Sustainability	<p>9) <i>To what extent has ICoCA developed resilience vis-à-vis a discontinuation of DCAF support?</i></p> <p><i>This question addresses the original ToR questions of 'How has DCAF support helped ICoCA to become an established and operational organization?' and 'Has the project laid the groundwork for a long-term implementation of the ICoC at regional, national and international levels?'</i></p>	<ul style="list-style-type: none"> • EQ9 will be answered on the basis of stakeholder feedback on ICoCA's resilience vis-à-vis a reduction or ending of DCAF support 	I(n)

Annex 4 – Interview guide

The following pages present the interview guide. Questions in normal font will only be addressed to FDFA, DCAF and ICoCA; questions highlighted in yellow will be addressed to all stakeholders.

Relevance

1) External coherence: How does the project support the overall goals of the so-called 'Swiss initiative'?

What do you consider the project's main contribution to the 'Swiss initiative'?

How does the project relate to the Montreux Document? Which specific project activities contribute to this?

How does the project relate to the Voluntary Principles on Security and Human Rights? Which specific project activities contribute to this?

Can you identify any elements of the 'Swiss initiative' that the project fails to address? Why?

2) Internal coherence: Are the MoU's 'personnel support' and 'administrative support' activities relevant to the project's immediate objectives?

To what extent do the 'personnel support' activities address ICoCA's needs in terms of organisational capacities? (DCAF project officer, 100%; DCAF deputy head of operations, 5%; Interim Director during September 2016 – September 2017)

To what extent do the 'administrative support' activities address ICoCA's needs in terms of organisational capacities? (office space; financial advice / accounting; human resources support)

Has the project failed to address any needs related to 'personnel support' and / or 'administrative support'?

3) Internal coherence: Are the MoU's 'functional support' and 'other' activities relevant to project medium-term objectives?

To what extent do the 'functional support' activities address ICoCA's needs in terms of certification? (background research / studies on ICoCA operational functions; promotion of ICoC/A (outreach / partnerships); consultation on tools and additional guidance)

To what extent do the 'functional support' activities address ICoCA's needs in terms of monitoring? (background research / studies on ICoCA operational functions; promotion of ICoC/A (outreach / partnerships); consultation on tools and additional guidance)

To what extent do the 'functional support' activities address ICoCA's needs in terms of complaints? (background research / studies on ICoCA operational functions; promotion of ICoC/A (outreach / partnerships); consultation on tools and additional guidance)

To what extent do the 'other' activities address ICoCA's needs in terms of certification? (promotion / interaction on Montreux Document Forum; Cooperation with Voluntary Principles Initiative; Development / promotion of Business and Human Rights initiatives; promotion of ICoC/A in framework of DCAF work on private security governance)

To what extent do the 'other' activities address ICoCA's needs in terms of monitoring? (promotion / interaction on Montreux Document Forum; Cooperation with Voluntary Principles Initiative; Development / promotion of Business and Human Rights initiatives; promotion of ICoC/A in framework of DCAF work on private security governance)

To what extent do the 'other' activities address ICoCA's needs in terms of complaints? (promotion / interaction on Montreux Document Forum; Cooperation with Voluntary Principles Initiative; Development / promotion of Business and Human Rights initiatives; promotion of ICoC/A in framework of DCAF work on private security governance)

Has the project failed to address any needs related to certification, monitoring or complaints?

4) Added value: How do DCAF activities (that are not funded by the project) add value to the project?

How do DCAF activities (that are not funded by the project) add value to the ICoCA organisational needs?

How do DCAF activities (that are not funded by the project) add value to ICoCA's certification function?

How do DCAF activities (that are not funded by the project) add value to ICoCA's monitoring function?

How do DCAF activities (that are not funded by the project) add value to ICoCA's complaints function?

5) Relevance: Did DCAF's support to the ICoCA address specific and important needs during the period and is it likely its support will help meet needs of the Association in the future?

Can you identify any specific needs related to the wider framework of PSC governance / respect of human rights that have emerged in the period October 2015 – June 2017? Has the project addressed these needs?

Can you identify any specific needs related to the wider framework of PSC governance / respect of human rights that are likely to emerge in the near future (2018-2020)? Would the project be well positioned to address these needs?

Impact

7) Has the project achieved its medium-term objectives (enhanced ICoCA performance in terms of certification, monitoring and complaints)?

To what extent has the project allowed ICoCA to enhance its delivery of the certification function during the period October 2015-June 2017?

To what extent has the project allowed ICoCA to enhance its delivery of the monitoring function during the period October 2015-June 2017?

To what extent has the project allowed ICoCA to enhance its delivery of the complaints function during the period October 2015-June 2017?

Can you identify any other project medium-term outcomes beyond the three ICoCA core functions?

Efficiency

8) Are project structure and processes suitable to implement project activities?

What are the advantages / disadvantages of the project structure (personnel support, functional support, administrative support, other)?

What are the advantages / disadvantages of the project processes (steering of DCAF support, project contribution to the interaction between the different elements of ICoCA governance (Assembly, Board, Executive Director, Secretariat))?

Have activities been implemented according to schedule?

Have activities been implemented according to budget?

Sustainability

9) To what extent has ICoCA developed resilience vis-à-vis a discontinuation of DCAF support?

To what extent have ICoCA organisational functions developed resilience vis-à-vis a discontinuation of DCAF support?

To what extent have ICoCA core functions developed resilience vis-à-vis a discontinuation of DCAF support?

Annex 5 – Data collection on relevance

Exhibit 5 – Project activities (functional / other)

Output / activity	Timeframe	Budget / Source	Related MoU sub-category
(event) ICoCA staff member participated in event in Canada on 1-3 March 2017	2017	Involved a DCAF staff member seconded to ICoCA	Cooperation with Voluntary Principles Initiative
(Legislative and regulatory advice) Revision of 2015 private security law in Peru	2016-2017	Involved a DCAF staff member seconded to ICoCA	
(event) ICoCA staff member participated in event in Geneva on 28 June 2017: 'Meeting with Board Members of the International Security Managers Association'	2017	Involved a DCAF staff member seconded to ICoCA	
(event) ICoCA staff member participated in event in Brussels on 23-24 March 2017: 'European Inter-Agency Security Forum'	2017	Involved a DCAF staff member seconded to ICoCA	

Exhibit 6 – DCAF added value

Output / activity	Timeframe	Budget / Source	Related MoU sub-category
(website) Private Security Governance Observatory	2016-2017?	SIPOL, Swiss Federal Department of Defence, Civil Protection and Sport, UK	Promotion of the ICoC/A (outreach / partnerships)
(event) Regional Conference on PMSCs and the Montreux Document	16 November 2015		Promotion / interaction on the Montreux Document Forum
(publication) The Montreux Document A Mapping Study on Outreach and Implementation	2017	FDFA, Directorate of International Law	Promotion / interaction on the Montreux Document Forum
(PPPs series) Putting Private Security Regulation into Practice: Sharing Good Practices on Procurement and Contracting 2015–2016: A Scoping Study	20 May 2016	DCAF	Promotion of ICoC/A in framework of DCAF work on private security governance
(PPPs series) The Montreux Document and the International Code of Conduct Understanding the Relationship between International Initiatives to Regulate the Global Private Security Industry	27 April 2016	DCAF	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Whose responsibility? Reflections on accountability of private security in Southeast Europe	24 August 2017	Swiss National Science Foundation	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Towards an International Code of Conduct for Private Security Providers: A View from Inside a Multistakeholder Process	28 January 2016	DCAF	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Armed Private Security in Latin America and the Caribbean, Oversight and accountability in an evolving context	20 December 2016	DCAF / UNLIREC	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Seguridad Privada en el Perú, un Estado Situacional	20 July 2016	Germany	Promotion of ICoC/A in framework of DCAF work on private security governance

Output / activity	Timeframe	Budget / Source	Related MoU sub-category
(Other publications) A FORCE FOR GOOD? Mapping the private security landscape in Southeast Europe	28 January 2016	Swiss National Science Foundation	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Private Security in Practice: Case studies from Southeast Europe	13 January 2017	Swiss National Science Foundation	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) The Privatisation of Security in Africa Challenges and Lessons from Côte d'Ivoire, Mali and Senegal	2 December 2016	Organisation Internationale de la Francophonie	Promotion of ICoC/A in framework of DCAF work on private security governance
(Other publications) Business and Security Sector Reform: The Case for Corporate Security Responsibility	19 February 2016	DCAF	Promotion of ICoC/A in framework of DCAF work on private security governance
(Tools) A Contract Guidance Tool for Private Military and Security Services: Promoting Accountability and Respect for Human Rights and International Humanitarian Law	23 August 2017	FDFA, Directorate of International Law	Consultation on tools and additional guidance
(Tools) Host Country Security Assessment Guide (DCAF, ICRC and IPIECA, 2017)	23 February 2017	IPIECA, ICRC	Consultation on tools and additional guidance
(Tools) Host Government Engagement Strategy Tool (DCAF, ICRC and IPIECA, 2017)	23 February 2017	IPIECA, ICRC	Consultation on tools and additional guidance
(Tools) Addressing Security and Human Rights Challenges in Complex Environments: Toolkit	28 January 2016	FDFA Human Security Division	Consultation on tools and additional guidance
(Tools) Regulating Private Military and Security Companies: The Montreux Document and the International Code of Conduct	7 April 2016	FDFA	Consultation on tools and additional guidance
(Tools) Legislative Guidance Tool for States to Regulate Private Military and Security Companies	25 November 2016	FDFA, Directorate of International Law	Consultation on tools and additional guidance
(Legislative and regulatory advice) Revision of private	2016-2017		Consultation on tools and

Output / activity	Timeframe	Budget / Source	Related MoU sub-category
security legislation and advice on good practices in Costa Rica			additional guidance
(Legislative and regulatory advice) Revision of Private Security Services Act in Guyana	2017		Consultation on tools and additional guidance
(event) DCAF staff member participated in event in Madrid on 10-11 May 2017: 'Security and Human Rights in Complex Environments'	2017		Promotion of ICoC/A in framework of DCAF work on private security governance

Annex 6 – Data collection on effectiveness

The following table shows data collection on effectiveness, i.e. the extent to which DCAF 's support allowed achieving immediate objectives (operationalisation of ICoCA organisational and core functions).

Exhibit 7 – Assessment of immediate objectives

Category	Sub-Category	Components	Form of DCAF input (project officer = po, project coordinator = pc, deputy head of operations = dh, interim director: id, other DCAF input = o)	Baseline - 1 October 2015 (status: d = under development, a = adopted, o = operational, finalised = f)	Endline - 30 June 2017 (status: d = under development, a = adopted, o = operational, finalised = f)
Organisational	Governance	Annual General Assembly	po, pc, id	d	a (jan 2016, o sept 2016) a (jan 2017 o oct 2017)
		Executive Director	id	f	(sept 2016 –oct 2017)
		Members – PSC Membership Application (English)	po	f	o (2014)
		Members – PSC Membership Application (French)	po	f	o (2014)
		Members – CSO Application (French)	po	f	o(2014)
		Members – CSO Application (English)	po	f	o(2014)
		Members – CSO Application (Spanish)	po	f	o(2014)
		Observer Application (English)	po	f	o(2014)

Category	Sub-Category	Components	Form of DCAF input (project officer = po, project coordinator = pc, deputy head of operations = dh, interim director: id, other DCAF input = o)	Baseline - 1 October 2015 (status: d = under development, a = adopted, o = operational, finalised = f)	Endline - 30 June 2017 (status: d = under development, a = adopted, o = operational, finalised = f)
		Observer Application (French)	po	f	o(2014)
		Observer Application (Spanish)	po	f	o(2014)
		Observer policy – Policy for observer fees	po	d	o (october 2016)
		Industry Membership Dues Invoicing Policy and Procedure	po	d	o (2015)
	Human Resource policy (incl. recruitment)		id	d	a (last quarter 2017)
	IT and data protection		id	d	a (2015, amended 2016) / d
	Conflict of interest policy		id	d	a (2014) / d
	Monitoring (key performance indicators)		po	d	a (2016) / d
	Finance (incl. accounting)		id	d	a/ d
	Procurement				
	Annual Reporting	ICoCA 2014-2015	id, po	d	a

Category	Sub-Category	Components	Form of DCAF input (project officer = po, project coordinator = pc, deputy head of operations = dh, interim director: id, other DCAF input = o)	Baseline - 1 October 2015 (status: d = under development, a = adopted, o = operational, finalised = f)	Endline - 30 June 2017 (status: d = under development, a = adopted, o = operational, finalised = f)
		Annual Report			
		ICoCA 2015-2016 Annual Report	po	d	f
		ICoCA 2016-2017 Annual Report	po, id	d	f
Functional	Certification	Article 11 Procedure - Certification	po, pc	d	o (2015)
		Standards - Comments on Draft ICoCA Recognition Statement for ISO 28007-1 (2015)	po, pc	d	f (2016)
		Standards – Recognition Statement for ISO 28007 (Approved)	po, pc	d	f (q1 2016)
		Standards – Draft Recognition Statement for ISO 18788	po	d	f, (q2 2016)
		Standards - Recognition Statement for ISO 18788 (Approved)	po, pc	d	f, (q2 2016)
		Standards – Recognition Statement for ANSI/ASIS PSC.1- 2012 (Approved)	po, pc	d	f q4 2015)
		Board of Directors'	po, pc	d	f (q3 2017)

Category	Sub-Category	Components	Form of DCAF input (project officer = po, project coordinator = pc, deputy head of operations = dh, interim director: id, other DCAF input = o)	Baseline - 1 October 2015 (status: d = under development, a = adopted, o = operational, finalised = f)	Endline - 30 June 2017 (status: d = under development, a = adopted, o = operational, finalised = f)
		Statement regarding ICoCA Certification			
		Application Form & Guidance - ICoCA Certification Process for PSC.1 certified companies	po	-	f (2016)
		Application Form & Guidance - ICoCA Certification Process for ISO 18788 certified companies	po	-	f (2016)
		Application Form & Guidance - ICoCA Certification Process for ISO 28007 certified companies	po	-	f (2016)
		Webinar	po, id	-	f (these are 'ongoing in a way: each year around the aga they are organised around topics that will be discussed at the aga)
		Research & paper on Accreditation of independent certification bodies	po, id	-	f (q2 2017, this approach was not accepted to be pursued further though)

Category	Sub-Category	Components	Form of DCAF input (project officer = po, project coordinator = pc, deputy head of operations = dh, interim director: id, other DCAF input = o)	Baseline - 1 October 2015 (status: d = under development, a = adopted, o = operational, finalised = f)	Endline - 30 June 2017 (status: d = under development, a = adopted, o = operational, finalised = f)
	Monitoring	Article 12 Procedure – Reporting, monitoring and assessing performance and compliance	po	d	a (sep 2016)
		Monitoring visits	no input from dcaf		
	Complaints	Article 13 Procedure – Receiving and processing complaints	pc, id	-	a (sep 2016)
		ICoCA Complaints Form	pc, id	-	a (february 2017)
		ICoCA Guidance for companies on grievance procedures	pc		d (february 2017)