SEAGULL MARITIME

HUMAN RIGHTS

IN MARITIME SECURITY OPERATIONS

Staff & Management Training Course

VPSHR | ICoCA | International Human Rights Law

Seagull Maritime Ltd

Version 1.0 | April 2026 | SM/CAM/DOC/002

MANDATORY — All shore-based staff and management

WHY THIS MATTERS

ICoCA

Certified Member

We are held to the highest international standards for private security

Shell

Audit Finding F6

Our biggest client specifically audited us on VPSHR compliance

YOU

Organisational Liability

Your decisions, oversight, and processes directly determine whether violations are prevented or enabled

THREE FRAMEWORKS, ONE PURPOSE

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VPSHR

Since 2000

Voluntary Principles on Security and Human Rights

How the company interacts with public and private security forces in the field

ICoCA

Since 2010

International Code of Conduct for Private Security Providers

How the company manages personnel, weapons, incidents, and governance

Montreux

Since 2008

Montreux Document on Private Military and Security Companies

Legal obligations of states and good practices for PMSCs (the legal backbone)

HOW THIS COURSE WORKS

Three layers — each builds on the last with no repetition:

LAYER 1 — **UNIVERSAL HUMAN RIGHTS BASELINE**

What every person in security must know — the foundation shared by all frameworks

LAYER 2 — **VPSHR — WHAT IT ADDS**

Company-to-government-to-community relationship obligations. Unique to VPSHR.

LAYER 3 — **ICoCA — WHAT IT ADDS**

Detailed operational management requirements. Personnel, weapons, grievance, governance.

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LAYER 1

Universal Human Rights

The foundation — what every person in security must know

CORE HUMAN RIGHTS PRINCIPLES

Right to Life, Liberty and Security

Every person has inherent dignity and rights — regardless of nationality, race, religion, sex, or status.

Prohibition of Torture

Torture and cruel, inhuman or degrading treatment is absolutely prohibited. No exceptions. Ever.

Prohibition of Slavery

Slavery, forced labour, and human trafficking are prohibited in all circumstances.

Freedom and Assembly

Freedom of expression, association, and peaceful assembly must be respected.

USE OF FORCE — YOUR OVERSIGHT

PRINCIPLES

- PCASP must take ALL reasonable steps to AVOID force
- Force only when STRICTLY NECESSARY — you enforce this
- Force must be PROPORTIONAL — you review every incident
- Firearms ONLY against imminent threat to life
- ALL force must be REPORTED — you ensure this happens
- MEDICAL AID to everyone — you resource and train for this

THE BENCHMARK

UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990)

This is the international gold standard.
All use of force decisions are measured against it.

REMEMBER

SM/SEC/PRO/003 (Rules on the Use of Force) governs all deployed teams. As shore-based staff, you must understand these rules so you can recognise when a report doesn't add up and escalate appropriately.

TREATMENT OF PERSONS

"Any persons so apprehended will be treated humanely and consistent with their status and protections under applicable human rights law or international humanitarian law, including prohibitions on torture or other cruel, inhuman or degrading treatment or punishment."

— Principle Ten, Rules on the Use of Force

Zero Tolerance on Bullying & Harassment

Workplace bullying, intimidation, and harassment — whether in the office or on deployment — are violations of this principle. You must act on reports, not dismiss them.

Discrimination is a Red Line

Discrimination based on race, nationality, religion, gender, or any protected characteristic is prohibited. This applies to hiring, tasking, treatment, and everyday interactions.

Dignity Applies to Everyone

Subcontractors, port agents, vessel crew, third-party workers — everyone interacting with Seagull is entitled to be treated with dignity. Your culture sets the standard.

RED LINES — ABSOLUTE PROHIBITIONS

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These are non-negotiable. There is no defence — not orders, not contracts, not emergencies.

- Torture or cruel, inhuman, degrading treatment or punishment
- Extrajudicial execution
- Sexual exploitation, abuse, or gender-based violence
- Human trafficking or forced labour
- Use of child labour (anyone under 18 for security services)
- Discrimination based on race, colour, sex, religion, disability, or sexual orientation
- Bribery or corruption of public officials

SUPERIOR ORDERS AND CONTRACT OBLIGATIONS ARE NOT A DEFENCE FOR ANY OF THE ABOVE

REPORTING OBLIGATIONS

WHAT YOU MUST ACT ON

- Any use of force report from deployed teams
- Any human rights concern — reported or observed
- Any weapons incident or equipment irregularity
- Any injury report — regardless of who was harmed
- Any allegation of abuse by public security
- Any trafficking or exploitation suspicion

YOUR ESCALATION PATH

1. **Receive:** Field report → Ops Manager → you
2. **Escalate:** GCD for compliance review and investigation
3. **Record:** HSE App + formal incident documentation

YOU ARE PROTECTED

Seagull Maritime guarantees no retaliation for good-faith reporting of human rights concerns.

This is backed by our Whistleblowing Policy, ICoCA membership, and UAE/Malta law.

LAYER 1 — KEY TAKEAWAYS

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1. Every person has inherent dignity — your role is to ensure our teams uphold it
2. Force is always the last resort — you must ensure every incident is reported and reviewed
3. The prohibition on torture has NO exceptions — not orders, not emergencies, not contracts
4. If a report reaches you, act on it — suppressing or ignoring it makes you complicit
5. Our systems, training, and oversight must make compliance the easy path — that's on us

These are universal standards. They apply whether you are in the Indian Ocean, West Africa, or anywhere else.

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LAYER 2

VPSHR — What It Adds

Company-to-government-to-community relationship obligations

VPSHR — RISK ASSESSMENT

VPSHR says our risk assessments must go beyond security threats and consider:

Security Risk ID

Political, economic, civil and social factors. Could our presence heighten risk?

Potential for Violence

Patterns of violence in the area. Consult civil society, governments, local sources.

Human Rights Records

Past HR records of local military, police, paramilitaries, and private security.

Rule of Law

Can local courts actually hold HR abusers accountable? If not — higher risk.

Conflict Analysis

Root causes of local conflicts. Level of adherence to IHL by key actors.

Equipment Transfers

Risk that equipment we provide could be misused for HR abuses.

VPSHR — PUBLIC SECURITY

This is unique to VPSHR — ICoCA doesn't cover it. When we operate alongside navies, coast guards, or port security, VPSHR creates specific obligations.

Consult Regularly

Hold structured meetings with public security about human rights and security issues.

Communicate Our Standards

Share our HR policies with public security and express our expectation they'll follow them.

Screen for Abusers

Individuals credibly implicated in HR abuses should not provide security for us.

Monitor and Report

Record and report ANY credible HR abuse allegations by public security in our operating area.

VPSHR — WHAT THIS MEANS FOR YOU

REPORT LANDS ON YOUR DESK

A Team Leader files a transit report from the Gulf of Aden. Buried in the narrative is a line about port security "roughly moving" a dock worker during embarkation.

As a manager, VPSHR requires you to:
- Recognise this as a potential public security abuse
- Escalate to the GCD for formal recording
- Ensure it is reported to the appropriate authorities
- Monitor whether an investigation actually happens
- You cannot file it and forget it

NEW CONTRACT NEGOTIATION

The Commercial team is finalising a contract with a client operating in a region with a poor human rights record and known public security abuses.

VPSHR requires you to:
- Ensure the risk assessment includes HR records and rule of law capacity
- Build VPSHR compliance clauses into the contract
- Require reporting mechanisms for public security interactions
- Ensure our teams are briefed on the specific risks
- Revenue does not override due diligence

VPSHR — PRIVATE SECURITY OBLIGATIONS

VPSHR Part III applies directly to you — here's what it requires of private security providers:

Observe Company HR Policies

Follow Seagull's ethical conduct and human rights policies at all times. Promote international humanitarian law.

Professional Proficiency

Ensure all personnel meet required training and competence standards before deployment. You are responsible for verifying this — not just assuming it.

Defensive Services Only

Provide only preventative and defensive services. Never engage in activities that are the responsibility of state forces.

No HR Abusers Employed

You should not be working alongside anyone with a credible history of human rights abuse.

All Allegations Recorded

Every allegation of HR abuse must be recorded and investigated — even unproven ones.

Confidentiality

Maintain confidentiality of operational information — except where silence would undermine human rights.

LAYER 2 — KEY TAKEAWAYS

1. VPSHR adds the company-to-government dimension — we must manage how our teams interact with public security
2. Our risk assessments must include human rights records, rule of law capacity, and conflict analysis
3. When public security abuse is reported — you must ensure it is recorded, escalated, and monitored
4. Our contracts must explicitly require VPSHR compliance from partners and subcontractors
5. Shell audited us on this specifically — every coordinator and manager must understand these obligations

VPSHR is why Shell audited us. It's why your professionalism matters beyond just the mission.

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LAYER 3

ICoCA — What It Adds

Detailed operational management, personnel, weapons, and governance

ICoCA — PERSONNEL DISQUALIFIERS

ICoCA Article 48 specifies explicit disqualifying criteria for carrying weapons. These are hard stops — not judgement calls.

- Battery
- Murder
- Arson
- Fraud
- Rape
- Sexual abuse
- Organised crime
- Bribery / corruption
- Perjury
- Torture
- Kidnapping
- Drug trafficking
- Trafficking in persons
- Dishonourable discharge
- Documented Code violations

ICoCA also requires prior employment records and government records checks. You consent to these checks as a condition of employment with Seagull Maritime (SM/INT/PRO/008).

ICoCA — WEAPONS MANAGEMENT

ICoCA Articles 56–62 prescribe detailed weapons management requirements. As shore-based staff, your role is oversight and control:

Authorisation Oversight

You must ensure all weapon authorisations are legally acquired, current, and compliant with flag state requirements. If it's not documented, it doesn't exist.

Sanctions Compliance

Illegal weapons, transfers, and any transaction violating UN Security Council sanctions are prohibited. Ops and Commercial must verify before every deployment.

Storage, Issuance & Audit Trails

Weapons must be securely stored with formal issue controls, issuance records, ammunition tracking, and verifiable disposal. You own the audit trail.

Training & Competence Verification

No one deploys with a weapon until training is verified and recorded. You are responsible for ensuring the Firearms Competency Procedure is followed — every time.

Seagull Reference: SM/INT/PRO/009 — Firearms Competency Procedure

ICoCA — INCIDENT REPORTING

ICoCA Article 63 goes further than the general reporting in Layer 1. Incidents must be formally documented with specific content:

TRIGGERS

- Any weapon discharge
- Any force escalation
- Equipment damage or loss
- Any injuries (all parties)
- Attacks on personnel or assets
- Criminal acts observed
- Accidents involving security forces

REQUIRED CONTENT

- Exact time and date
- Location (coordinates if possible)
- All persons involved (names, roles)
- Injuries and/or damage sustained
- Full circumstances of the incident
- Response measures taken
- Internal inquiry findings

Use the Seagull Safety Reporting App (report.seagullmaritimeltd.com) — it captures all of this automatically.

ICoCA — GRIEVANCE & WHISTLEBLOWING

ICoCA Articles 66–68 require a formal grievance mechanism that goes beyond basic whistleblowing:

Open to Everyone

Not just employees — third parties (port agents, vessel crew, community members) can raise HR concerns too.

Fair and Impartial

Investigations must be prompt, impartial, and confidential. Not a tick-box exercise.

Real Protection

Whistleblower protection is explicit and non-negotiable. Retaliation against anyone who reports in good faith is prohibited.

Real Consequences

Disciplinary action up to and including termination. This is not optional — it's an ICoCA certification requirement.

ICoCA — YOUR EMPLOYMENT RIGHTS

ICoCA doesn't just create obligations for you — it protects you too:

Clear Contract Terms
Your contract must incorporate the ICoC and local labour laws. Terms must be communicated in a language you understand.

Passport Protection
The company can only hold your passport for the shortest reasonable period. It cannot be retained indefinitely.

Record Keeping
Your employment records are retained for 7 years and are available to compliance mechanisms if needed.

Safe Working Environment
The company must provide risk assessments, protective equipment, medical support, and psychological health policies.

No Harassment
Harassment and abuse from co-workers is not tolerated. Zero tolerance — report through the grievance mechanism.

LAYER 3 — KEY TAKEAWAYS

1. ICoCA disqualifiers are hard stops — recruitment and HR must screen for these before deployment
2. Weapons management is your compliance responsibility — authorisation, storage, records, and audit trails
3. Incident reports landing on your desk must contain specific content — you check for completeness
4. The grievance mechanism is open to third parties — you may receive complaints from outside Seagull
5. ICoCA also protects our people — you must ensure contracts, conditions, and workplace standards are met

ICoCA certification means we're independently audited on all of this. It's not aspirational — it's verified.

HOW SEAGULL IMPLEMENTS THIS

Every requirement in this course maps to a Seagull Maritime document:

DOCUMENT REF	TITLE	COVERS
SM/SEC/POL/002	Human Rights Policy	Company HR commitment — the foundation
SM/INT/POL/002	Code of Conduct	Every employee's personal obligation
SM/SEC/PRO/003	Rules on the Use of Force	Operational use of force framework + RUF Card
SM/OPS/SOP/001	IOR Standard Operating Procedures	Operational SOPs with VPSHR embedded
SM/INT/PRO/008	PCASP Recruitment and Screening	Personnel vetting against ICoCA criteria
SM/INT/PRO/009	Firearms Competency Procedure	Weapons training and authorisation
SM/INT/PRO/010	Training and Competence	Training framework including VPSHR section
SM/INT/PRO/006	Incident and Crisis Management	Incident reporting and response

All documents available via the Seagull Safety Reporting App (Documents Library) or from your Team Leader.

THINK ABOUT IT

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SCENARIO

You are an Operations Coordinator. A transit report comes in from the Gulf of Aden. The Team Leader reports "suspicious approach, warning shots fired, vessel departed." But a second team member privately messages a colleague saying additional rounds were fired after the vessel turned away. The Team Leader's report makes no mention of this.

Your Operations Manager says "the TL report is the official one — leave it."

What should you do?

Is the TL report sufficient?
Can you ignore the second account?
Who do you escalate to?
What are YOUR obligations here?

The answer

Escalate immediately to the GCD. Two conflicting accounts means the report is incomplete. ICoCA Art. 63 requires full documentation. "Leave it" is not an option — knowing about a potential violation and suppressing it makes you part of the problem.

THINK ABOUT IT

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SCENARIO

A new client prospect in West Africa requests armed guards. During the Commercial team's vetting process, you discover the client has previously been linked to a company sanctioned for using forced labour in port operations. The Commercial Manager says "that was years ago, they've cleaned up, and we need the revenue."

The DD process (SM/SEC/PRO/002) hasn't flagged it because the sanction was against a related entity, not this company directly.

What should you do?

Does the link to forced labour matter if indirect?
Can revenue pressure override DD findings?
Which frameworks apply here?
Who makes the final decision?

The answer

Escalate to GCD. ICoCA prohibits association with entities linked to HR abuses (Layer 3). VPSHR risk assessment requires checking HR records of partners (Layer 2). Revenue pressure never overrides compliance. The GCD makes the final accept/reject decision.

REMEMBER

Human rights are not a compliance exercise. They are the reason we exist.

Our clients trust us to protect their people and assets.
The people in our operating areas trust us to respect their rights.
The international community trusts us to uphold the standards we've signed up to.

Your oversight is their protection. Your processes are our compliance.

Complete your assessment to receive your certificate.