



Fargo House, Redcross Road.
P.O Box 43370-00100 Nairobi Kenya
+254 (0) 703 077 777, 703 077 500, 703 077 001
Email: info@fargo.co.ke
Website: www.fargo.co.ke

INTEGRATED MANAGEMENT SYSTEMS

Based on ISO 9001, ISO 45001, ISO14001, & ISO18788

Integrated System Procedures for Rules For Use of Force (RUF)

	DESIGNATION	SIGN	DATE
Prepared by	Head Of Risk & Compliance		15/09/2025
Reviewed by	Country Operations Manager		15/09/2025
Approved by	Chief Operating Officer		15/09/2025



CIRCULATION

Copy No.	Copy Holder
1.	Head Of Risk & Compliance
2.	Country Operations Manager
3.	Chief Operating Officer

Controlled copy



AMENDMENT SHEET

Issue/ Revision Number	Subject of amendments	Reviewed by		Authorized by		Date
		Name	Sign	Name	Sign	
May 2024/ 00	Initial issue	-	-	-	-	May 2024
Sep 2025/001	Incorporation of ISO 18788					May 2025



TABLE OF CONTENTS

CIRCULATION.....	2
AMENDMENT SHEET.....	3
OUR VISION	5
OUR MISSION	5
OUR CORE VALUES.....	5
WELLS FARGO SECURITY – PROCEDURE FOR USE OF FORCE.....	6
4. Purpose	6
5. Scope	6
6. Terms and Definitions.....	7
7. Wells Fargo Use of Force Policy Statement.....	9
8. Processes.....	10
8.1 Description of process	10
8.2 Main steps for use of Force	11
8.2.1 Policy Communication and Awareness.....	11
8.2.2 Pre-Deployment Authorization	11
8.2.3 Incident Response and Application of Force.....	11
8.2.4 Incident Reporting and Documentation.....	11
8.2.5 Review, Investigation, and Corrective Action.....	11
8.2.6 Principles Governing Use of Force	11
8.2.7 Use of Force Continuum	11
8.2.8 Human Rights Safeguards.....	13
8.2.9 Continuous Monitoring and Improvement.....	13
9. RACI Matrix – Use of Force	13
10. KPI Monitoring Framework.....	13
11. Attachments Register.....	14



OUR VISION

Our vision is to become the leading protection and security service provider in Eastern Africa. We aspire to set the industry standard for excellence, innovation, and reliability, delivering unparalleled security solutions to our clients across the region.

As the preferred choice for protection and security services, we aim to be recognized for our unwavering commitment to customer satisfaction, our uncompromising adherence to the highest professional and ethical standards, and our ability to consistently exceed expectations.

OUR MISSION

Our mission is to become the preferred supplier of domestic, corporate, and banking security and protection solutions in Kenya. We are committed to achieving this objective by continuously investing in and developing our resources, including our people, processes, and technology.

We recognize that the security landscape is ever-evolving, and our customers' needs are diverse and dynamic. Therefore, we strive to stay at the forefront of the industry by constantly enhancing our capabilities and adapting to emerging trends and challenges.

OUR CORE VALUES

❖ Focus

We prioritize our clients' security needs by creating tailor-made security solutions to ensure that their assets and personnel are protected. We are dedicated to providing unparalleled security services that meet and exceed our client's expectations.

❖ Accountability

We believe in taking responsibility for our actions, decisions, and results. Therefore, operating with transparency, honesty, and integrity in all our interactions with our clients, employees, and stakeholders. Our commitment to accountability ensures that our clients can trust us to always act in their best interests.

❖ Reliability

We are committed to delivering reliable security services to our clients. Our experienced and trained security personnel are equipped with the latest technology and techniques to provide comprehensive security solutions that meet and exceed our client's expectations.

❖ Growth

We are committed to growing our business by continually improving our security services and expanding our reach. We embrace innovation and adapt to new challenges to achieve our mission and stay ahead of our competitors.

❖ Organized

We are a well-organized security company that utilizes a structured approach to manage our clients' security needs. We ensure that our personnel, technology, and processes are coordinated and aligned to deliver the best possible security services to our clients.



Wells Fargo Security – Procedure for Use of Force

4. Purpose

This procedure defines how Wells Fargo Security (WFL) manages the use of force during operations. It ensures compliance with **ISO 18788**, **ICoCA requirements**, and applicable **Kenyan laws**, while safeguarding **human rights** and ensuring accountability, transparency, and proportionality.

5. Scope

This procedure applies to:

- All **WFL employees** authorized to use force during operations.
- All **assignments and deployments** where the risk assessment indicates potential use of force.
- All **incidents** where force is applied, whether physical restraint, defensive measures, or use of firearms.
- All **supporting functions** including management, training, compliance, legal, and stakeholder engagement.

6. Terms and Definitions

For the purposes of this Use of Force Policy, the following terms and definitions shall apply. Cross-references indicate where the terms are applied within this policy.

Term	Definition	Cross Reference
Use of Force	The application of physical strength, control techniques, authorized equipment, or weapons to manage a security situation. Derived from ISO 18788:2015, Clause 8.9.	Policy Statement; Section 5 (Principles); Section 6 (Continuum)
Proportionality	The principle requiring that the level of force used must correspond to the seriousness of the threat and not exceed what is necessary to achieve a legitimate objective. Based on UN Basic Principles, Principle 5.	Section 5 (Principles Governing Use of Force); Section 6 (Continuum)
Necessity	The requirement that force may only be used when it is unavoidable to protect life, property, or prevent imminent crime. Referenced in ISO 18788:2015, Clause 9.2 (Risk Treatment).	Section 3 (Policy Statement); Section 5 (Principles)
Last Resort	The requirement that all reasonable non-violent measures, including dialogue and de-escalation, are attempted before applying force. Rooted in UN Basic Principles, Principle 4.	Section 5 (Principles); Section 6 (Continuum)
De-escalation	Actions and communication designed to reduce tension and resolve a conflict without the need for physical force. Derived from ISO 18788:2015, Annex A, A.9.	Section 6 (Use of Force Continuum); RACI Matrix
Deadly Force	Force that can cause death or serious bodily harm, only permissible when strictly necessary to protect life. Based on Kenyan Penal Code and UN Basic Principles, Principle 9.	Section 6 (Continuum); Section 7 (Human Rights Safeguards)
Human Rights	The inherent, inalienable rights of all persons, including dignity, equality, and freedom from torture, cruel, inhuman or degrading treatment. Based on UDHR 1948, ICCPR 1966, and ISO 18788, Clause 5.3.	Section 3 (Policy Statement); Section 7 (Human Rights Safeguards)
Force Continuum	A structured model that guides escalation and de-escalation in the application of force, from presence to	Section 6 (Use of Force Continuum)

	verbal commands to non-lethal measures and, lastly, deadly force.	
Security Officer	An individual employed or contracted by Wells Fargo Security Kenya to provide protective security services under this policy. Defined in ISO 18788:2015, Clause 3.1.	Section 8 (RACI Matrix); Section 9 (KPIs)
Supervisor	The appointed site-level authority responsible for ensuring compliance with the use of force policy, including reporting and oversight.	Section 8 (RACI); Section 9 (KPIs)
Incident Report	The formal documented record of any event involving the use of force, including circumstances, justification, actions taken, and outcome. Referenced in ISO 18788:2015, Clause 9.2 (Monitoring and Reporting).	Section 9 (KPIs); Section 10 (Attachment Register)
Accountability	The obligation of all personnel to answer for actions and decisions regarding the use of force, ensuring transparency and corrective measures. Linked to ISO 18788:2015, Clause 9.3.	Section 5 (Principles); Section 11 (Monitoring & Review)
Compliance Monitoring	The systematic review and auditing of adherence to the use of force policy, legal obligations, and human rights standards.	Section 9 (KPIs); Section 11 (Monitoring & Review)



7. Wells Fargo Use of Force Policy Statement

Wells Fargo Security (WF) recognizes its duty to safeguard human rights, preserve dignity, and uphold the rule of law in all operations. The use of force by WFL employees is strictly regulated and applied only when necessary, proportionate, and lawful.

We commit to the following principles:

1. **Legality** – We comply with all applicable national laws, international human rights standards, and contractual obligations when authorizing and applying force.
2. **Necessity** – Our personnel apply force only as a last resort, after exhausting all reasonable alternatives, including communication and de-escalation techniques.
3. **Proportionality** – Any force used must be proportionate to the threat faced and limited to the minimum necessary to achieve a lawful and legitimate security objective.
4. **Accountability** – We require clear authorization for arming personnel, maintain accurate records of such authorizations, and ensure prompt reporting of all incidents involving the use of force.
5. **Transparency** – We notify clients, regulators, and relevant stakeholders of incidents as required, and we cooperate fully with lawful investigations.
6. **Oversight** – We integrate human rights risk assessments, regular training, audits, and stakeholder engagement into our use of force governance framework.
7. **Zero Tolerance for Abuse** – We prohibit the misuse of force, torture, cruel or degrading treatment, and any action that violates human rights.

WFL senior management ensures all employees understand and apply this policy. We hold leaders and supervisors accountable for compliance, monitoring, and continuous improvement.

This policy reflects our commitment to responsible security operations, aligned with the requirements of **ISO 18788**, the **ICoCA Code of Conduct**, and the expectations of our clients and communities.

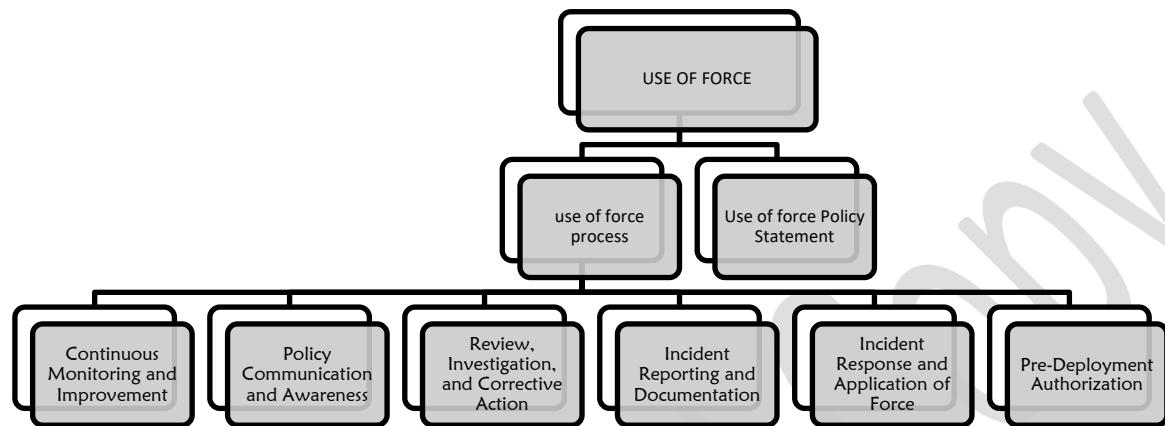
Name:

Group Chief Executive Officer

Date

8. Processes

8.1 Description of process



8.2 Main steps for use of Force

8.2.1 Policy Communication and Awareness

Management develops and maintains a **Use of Force Policy**. The HR and Training Department trains all employees on the principles of legality, necessity, proportionality, accountability, and human rights. Management communicates the policy internally and makes it available to clients, regulators, and stakeholders.

8.2.2 Pre-Deployment Authorization

Operations Managers conduct risk assessments and authorize employees who may need to use force or carry weapons. Managers document the authorization, specify the scope, and ensure personnel receive clear briefings on rules of engagement and escalation protocols.

8.2.3 Incident Response and Application of Force

Security Officers apply force only when necessary and proportionate. They exhaust all alternatives, including **verbal de-escalation**, before applying physical or armed force. Supervisors monitor field activities to ensure compliance with policy.

8.2.4 Incident Reporting and Documentation

Security Officers report every use of force incident immediately to Supervisors. They complete a **Use of Force Incident Report** with details of actions taken, justification, and outcome. Operations Managers escalate reports to Compliance and Legal teams. If firearms are used, WFL notifies relevant regulatory authorities.

8.2.5 Review, Investigation, and Corrective Action

Compliance and Legal teams review all reports within seven days. They investigate whether employees followed policy, assess human rights impacts, and recommend corrective actions such as retraining, disciplinary measures, or system improvements. Management shares outcomes with clients and regulators as appropriate.

8.2.6 Principles Governing Use of Force

1. **Last Resort** – Force is used only after all other options are exhausted.
2. **Necessity** – Force is applied only when unavoidable to protect life, property, or prevent crime.
3. **Proportionality** – The degree of force used must be proportional to the threat.
4. **Legality** – All actions must comply with Kenyan law, ISO 18788, and UN conventions.
5. **Accountability** – All use of force incidents must be documented, reported, and reviewed.

8.2.7 Use of Force Continuum

1. **Presence** – Visible professional presence of a uniformed officer.
2. **Verbal Commands** – Clear, calm, assertive instructions.
3. **Soft Control Techniques** – Escort holds, guiding resistant individuals.



4. **Hard Control Techniques** – Physical restraint of actively aggressive subjects.
5. **Non-lethal Authorized Weapons** – Use of batons, handcuffs, or other approved devices.
6. **Deadly Force** – Strictly as a last resort when life is under imminent threat.

Controlled copy

8.2.8 Human Rights Safeguards

- Respect dignity and rights of all persons.
- Prohibit torture, inhumane or degrading treatment.
- Prohibit unlawful detention; apprehended persons must be handed over to police.
- Ensure cultural sensitivity and non-discrimination.

8.2.9 Continuous Monitoring and Improvement

The Compliance Department monitors use of force trends and integrates findings into risk assessments and training. Management conducts regular **Human Rights Impact Assessments** and engages with stakeholders, including communities, clients, and regulators, to maintain transparency. Management reviews and updates the procedure annually.

9. RACI Matrix – Use of Force

Activity	Responsible	Accountable	Consulted	Informed
Develop and Communicate Use of Force Policy	HR & Training Dept.	General Manager	Legal & Compliance	All Staff
Pre-deployment Authorization	Operations Manager	General Manager	HR & Legal	Client
Apply Use of Force (in the field)	Security Officers	Operations Manager	Supervisors	Client & Management
Report Use of Force Incident	Security Officer	Operations Manager	Legal & HR	Management
Review and Investigation	Compliance & Legal	General Manager	HR & Supervisors	Client
Continuous Monitoring & Policy Update	Compliance Dept.	General Manager	HR & Legal	Board, ICoCA

10. KPI Monitoring Framework

S/No	Process Step	KPI	Evidence	M&E Method	Responsibility
1	Policy Communication	% of staff trained on use of force	Training records	Training audits	HR Dept.
2	Pre-deployment Authorization	% of deployments with documented authorization	Authorization logs	Internal audits	Operations Manager
3	Incident Response	Ratio of incidents resolved without force	Incident reports	Monthly review	Supervisors
4	Incident Reporting	% of incidents reported within 24 hrs	Incident Reports	Compliance monitoring	Operations Manager
5	Review & Investigation	% of cases reviewed within 7 days	Investigation reports	Compliance review	Legal Dept.
6	Continuous Monitoring	# of HRIA and stakeholder consultations conducted	HRIA reports, stakeholder meeting minutes	Annual review	Compliance & HR

11. Attachments Register

S/No	Reference #	Documented Information Generated	Location	Retention Period
1	UF-001	Use of Force Policy	HR Dept.	5 years
2	UF-002	Training Records	HR Dept.	5 years
3	UF-003	Pre-deployment Authorization Logs	Operations Dept.	3 years
4	UF-004	Use of Force Incident Reports	Compliance Dept.	10 years
5	UF-005	Investigation Reports	Legal & Compliance	10 years
6	UF-006	Human Rights Impact Assessments	Compliance Dept.	5 years
7	UF-007	Stakeholder Engagement Records	Management Office	5 years