



An tÚdarás Slándála Príobháidí
The Private Security Authority

Auditing Guidelines for Remote Audits for PSA Standards (PSA28:2013)

JUNE 2020

(1) Public Health Crisis (Covid-19)

The onset of the Covid-19 lockdown resulted in a temporary suspension of certification audits for PSA licensing. The PSA introduced measures in light of the Government-issued restrictions and physical distancing requirements which allowed licensed contractors whose certification had recently expired to continue to operate on pre-existing certification; however, this was only intended as a temporary measure. The PSA also recognised that contractors may have difficulty, or in some cases be unable, at this time to maintain compliance with certain requirements of the standards.

The importance of ensuring continued compliance by contractors with PSA28:2013 is as important now as ever, particularly given that contractors may find themselves in an altered working environment and in circumstances where their business operations may have to evolve significantly in order to ensure that they meet the needs of their employees and clients.

At this time, it is still not possible to undertake certification audits involving a physical inspection at the contractors' premises and an alternative means involving remote auditing is now required. The purpose of this Information Note is to provide Auditing Bodies (ABs) with direction and guidance on the process of remote auditing as well as providing guidance on how certain requirements of PSA28:2013 should be handled.

(2) Remote Auditing

It is envisaged that remote auditing will be undertaken largely by electronic means with requested documentation being submitted securely by contractors to their AB, however, it may also be necessary for documentation to be submitted by postal correspondence. It is recommended that in advance of undertaking a remote audit that ABs seek to preliminarily engage with contractors and discuss the most effective means by which the process will be undertaken.

ABs should ensure that there is no diminution in the application of their data protection protocols and procedures while undertaking remote auditing.

(3) Pre-Audit Considerations

The following shall be considered and undertaken by ABs before carrying out audits.

- 1) Has a risk assessment being carried out to evaluate the needs and requirements of the audit at this particular time?

The AB should identify the needs and requirements to allow the audit to proceed and be satisfied that a successful audit can be conducted remotely.

- 2) Has the contractor passed an audit for the standard being audited or any other standard within the past 12 months?

If a contractor has been audited for any standard within the past 12 months, is it an absolute necessity that an audit be conducted at this time? Can any of the requirements of this audit be met from the findings of a previous audit?

- 3) Has the business being impacted by the COVID-19 crisis and how has this affected contracts and normal business conditions for the contractor?

The contractor should be contacted to see how their business has been impacted by the COVID-19 crisis. Where necessary, contractors should be allowed time to focus on re-establishing their business before engaging in the audit process.

- 4) Has the contractor being adversely impacted financially and can the Auditing Body help alleviate the burden of cost of the audit for the contractor?

The AB should have systems in place to ease the financial burden on contractors.

- 5) Have contractors got the capacity to undertake a remote audit?

ABs should consider the resources required for a contractor to undertake a remote audit. Particular attention should be paid of the contractors' technical capacity to provide the information required to complete a remote audit.

If it is decided that a remote audit is to proceed, the contractor should provide the following lists to allow for random samples to be selected:

- list of employees including date of commencement of employment
- list of active contracts including commencement date
- list of quotations issued in the previous 12 Months
- List of vehicles including registration number

The AB can take samples from these lists in accordance with the guidelines set out in this document when requesting the submission of documentation for remote audit.

(4) Scope of Remote Auditing

It is recognised that the process of remote auditing will be a significant departure from how the auditing process has previously been conducted. The process of remote auditing is not intended to replace physical inspections but is the closest alternative possible at this time which allows for the ongoing verification of compliance with PSA28:2013. The operation of remote auditing will be reviewed periodically to ensure that it remains effective and adapts to any evolving business needs.

It is also recognised that it will not be feasible to examine certain requirements of PSA28:2013, either wholly or in part, during a remote audit. Guidance notes have been provided in section (5) of this Information Note in respect of each section of PSA28:2013 with a view to providing clarity as to how particular clauses or issues should be handled.

Where a contractor indicates during a remote audit that they are unable to achieve compliance with certain requirements of PSA28:2013 for reasons relating to the public health crisis (Covid-19), it is expected that ABs will endeavour to obtain and record a detailed explanation as to why compliance cannot be achieved.

To ensure a standardised approach, the template at Annex A of the Auditing Guidelines for Certification Bodies for PSA28:2013 should be used to record the details of all remote audits (i.e. "*Sample PSA 28:2013 Audit Report*")

(5) Guidelines for Remote Audits

The following guidelines are to apply for the duration of remote audits. The PSA will review them on a continuous basis in light of the outcomes of the audits and may update the guidelines accordingly. The clause numbers referenced herein correspond to the associated clause in PSA 28:2013. The "*AUDITING GUIDELINES*

FOR CERTIFICATION BODIES FOR PSA28:2013 (2015 EDITION)" document applies to remote audits unless stated otherwise in this document.

2.2.2 The PSA may request certification bodies to focus their audit on certain areas of organisations activities. Such requests will be within the terms of PSA 28:2013.

2.2.3 All audits shall be conducted remotely. Registered address should be verified by CRO check.

2.2.4 Registered legal status verified by CRO check.

2.2.5 Changes of address should be recorded.

2.2.6 Audits shall be conducted in accordance with these guidelines. Where the guidelines require the recording of an action or other matter this shall be recorded in the audit report.

2.2.7 Where PSA 28:2013 or these guidelines require an auditor to inspect or sample records or other documents the auditor shall select at random from a list of such records or documents the ones to be audited. Under no circumstances shall an auditor accept records chosen or selected by the organisation.

For remote audits, the PSA recommends that any sample size should equal the square root of the total training records and the square root of the total screening records, as a minimum. Where the sample size exceeds 10 the Auditor may stop at 10 if satisfied that a pattern of compliance has been established from the selected sample.

The name of each sample record/document should be recorded.

2.2.8 When an organisation has successfully completed an audit they shall be issued with a certificate of compliance/registration certifying same. Certificates shall indicate that the audit was undertaken remotely and shall be valid for a period of 12 months.

2.2.9 When an audit has been completed the AB shall provide a copy of the audit report to the PSA immediately. The AB shall provide non conformance reports to the PSA on a quarterly basis.

2.2.10 Audit reports shall be in the format set out in **Annex A**.

2.2.11 Where a contractor holds Phase 1 certification, a full audit in accordance with PSA 28:2013 and these guidelines shall occur within 6 months of the issuing of a PSA licence or by the 1st November 2020, whichever is the later.

2.2.12 Where a contractor fails to obtain compliance to these auditing guidelines or fails to arrange an audit for same, the certification body shall notify the PSA immediately.

Audit Compliance

2.3.1 Full compliance with these auditing guidelines in accordance with **2.4** must be achieved before certification can be issued.

2.3.2 Where an organisation fails to comply with any of the requirements of the auditing guidelines, details of all the non-compliances shall be recorded in the audit report together with details of the required corrective actions and the timeframe by which the corrective action is to be completed.

2.3.3 When corrective action has been completed, this should be recorded on the audit report together with details of how the corrective action was verified by the auditor.

2.3.4 When finalised audit reports should detail all non-compliances and corrective actions.

Audit Non-Conformances

2.4.1 Where a contractor fails to meet any of the requirements of PSA 28:2013 this shall be recorded as a non-compliance in accordance with the categories specified in these auditing guidelines. Organisations have 5 weeks from date of audit to rectify a non-conformance.

The following criteria shall apply to non-conformances.

- 1) Organisations shall not pass an audit where:
 - A category 1 non-conformance is present.
 - 3 or more category 2 non-conformances are present.
 - 6 or more category 3 non-conformances are present.
 - A combination of 6 or more category 2 and category 3 non-conformances are present.

All non-conformances at 1) must be closed before an audit is passed.

- 2) An organisation may pass an audit where:
 - Less than 3 category 2 non-conformances are present.
 - Less than 6 category 3 non-conformances are present.
 - A combination of less than 6 category 2 and category 3 non-conformances are present.

Organisations are still required to rectify all non-conformances. However, any follow up action by the auditor may be deferred until the next audit. If at the next audit a non-conformance has not been rectified the non-conformance category shall move up a level.

- 3) Section 1 of the above criteria continues to apply where an organisation rectifies some of their non-conformances. An organisation may not move from section 1 to section 2 by virtue of rectifying a non-conformance.

2.4.2 Where the 5 week period referred to in **2.4.1** has elapsed and an organisation has not passed an audit, the certification body shall write to the organisation requiring them to rectify all outstanding matters within 14 days and advising that failure to do so, within 7 days of the expiration of the 14 day timeframe, will result in their certification being suspended for a period of 3 months and the PSA being notified of same.

2.4.3 On receipt of notification that an organisations certification has been suspended the PSA will commence compliance action against the organisation. This action may result in the suspension or revocation of an organisations licence.

Audit Reports

2.5.1 An audit report shall be produced for each audit completed. The audit report shall include the following information:

- 1) The name, address and contact details of the certification body,
- 2) The name of the auditor(s) who undertook the audit,
- 3) The date(s) of the audit(s),

- 4) The name, address, contact details and PSA licence number of the contractor,
- 5) A summary of the audit highlighting any non-conformities found.
- 6) Update report on screening and training records reviewed to date (**Annex B of the AUDITING GUIDELINES FOR CERTIFICATION BODIES FOR PSA 28:2013 (2015 EDITION)**)

2.5.2 A copy of the audit report shall be sent by the AB to the PSA within 14 days of completion of the audit.

Certification

2.6.1 All certificates for PSA 28:2013 issued by certification bodies shall contain the organisations address as recorded on the organisations PSA licence.

ORGANISATION

3.1 Ownership

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.2 Finances

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.3 Insurance

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.4 Premises

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.5 Organisation Information

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.6 Quotations in pursuance of Contracts or Business

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

3.7 Compliance with Legislation

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

STAFFING

4.1.1 General

Before commencing a review of the Staffing Clauses the auditor should have the following documents:

- a) A current employee list showing the name, PSA licence number, sector of employment (SG/DSP/Both), Employment Status (Full or Part Time), date of birth, date of commencement and immigration status.
- b) A current sample Terms of Employment contract and Staff Handbook (Clause 4.2.2 refers)
- c) A current sample Code of Conduct document. (Clause 4.3.1 refers)

The three records listed above would allow the auditor to assess the following clauses remotely:

Clause 4.1.1.5

Clause 4.1.1.10

Clause 4.1.1.11

Clause 4.1.4.1

Clause 4.1.5.1 to Clause 4.1.5.3

N.B. With reference to any employee working with a STAMP 2 card/ Student VISA: *From 1 September 2016 students holding a valid immigration stamp 2 permission will be permitted work 40 hours per week only during the months of June, July, August and September and from 15 December to 15 January inclusive. At all other times students holding Immigration permission Stamp 2 will be limited to working 20 hours per week.*

Clause 4.1.6.3

The above clauses should be audited in accordance with PSA 28 Auditing Guidelines. These are the only clauses to be audited in this section as part of the remote audit.

4.2 Terms of Employment

Clause 4.2.2 shall be audited in accordance with PSA 28 Auditing Guidelines. (Contents of sample document to be assessed)

4.3 Code of Conduct

Clause 4.3.1 shall be audited in accordance with PSA 28 Auditing Guidelines. (Contents of sample document to be assessed)

4.4 Identification

These clauses do not require auditing.

4.5 Uniform

These clauses do not require auditing.

4.6 Threats and Violence

These clauses may be audited in conjunction with the clauses in 6.1

TRAINING

5.1 Training Policy and Responsibility

These clauses shall be audited in accordance with PSA 28 Auditing Guidelines by checking the Training Policy.

5.2 Induction Training

This clause does not require auditing.

5.3 Site Related Training

These clauses may be audited by examining a selection of recent site specific training plans.

5.4 Basic Training

This clause does not require auditing.

5.5 Trainers and Training

These clauses do not require auditing.

5.6 Specialist Training

These clauses do not require auditing. (Consider in the context of Covid-19 related training)

5.7 Refresher Training

This clause does not require auditing.

5.8 Supervisory and Management Training

This clause does not require auditing.

5.9 Training Records

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

OPERATIONS

6.1 Risk Assessments

All clauses may be audited in accordance with PSA 28 Auditing Guidelines.

4.6 requirements should also be audited as part of this section.

6.2 Command and Control System

6.2.2 Identify the type of Command & Control System deployed and request the associated Command & Control Manual

With the aid of the Command & Control manual request that the contractor demonstrates compliance with the following clauses:

Clause 6.2.1

Clause 6.2.3

In respect of a Dedicated Fixed Location system the contractor should be asked for a written statement in respect of compliance with:

Clause 6.2.4

Clause 6.2.7

Clause 6.2.8

- In respect of a Contracted Facility system the contractor should be asked for a written statement in respect of compliance with:

Clause 6.2.5 (Last physical inspection should be pre March 2020)

Clause 6.2.7

Clause 6.2.8

In respect of a Manned Site / Mobile Unit system the contractor's *Command & Control Manual* should reflect the contents of the requirements of the PSA 28 Auditing Guidelines – **Clause 6.2.2 (i)** and **Clause 6.2.3**.

In respect of a Looped Check-In Call system the contractor's *Command & Control Manual* should reflect the contents of the requirements of the PSA 28 Auditing Guidelines – **Clause 6.2.2 (ii)** and **Clause 6.2.3**.

6.3 Operations Records

Clause 6.3.1 – Procedures should be recorded in the Command & Control Manual.

Sample Incident Reports selected over an 18 month period can be requested to assess the following:

Clause 6.3.2

Clause 6.3.3

Clause 6.3.4

Clause 6.3.8

A written statement from the contractor should be requested in respect of compliance with the following:

Clause 6.3.5 (May also be referenced in the Command & Control Manual)

Clause 6.3.7

Clause 6.3.6 shall be audited in accordance with the PSA 28 Auditing Guidelines.

N.B. For contractors operating a Manned Site / Mobile Unit system OR a Looped Check-In Call system the verification requirements of the Auditing Guidelines must be demonstrated.

Employee checks made by text messages / Whatsapp groups etc do not meet the requirements of the standard. Any contractor monitoring the safety/welfare of their employees by this method should not pass a PSA 28 audit and the contractors details should be notified to the PSA

6.4 Assignment Instructions

A sample of Assignment Instructions should be requested from the contractor. The sample should be a scanned copy of the “live” document deployed at the client location i.e. not a blank template. The following clauses can be assessed:

Clause 6.4.1

Clause 6.4.2 – client endorsement should be noted in all cases.

Clause 6.4.3

Clause 6.4.4

Clause 6.4.5

N.B. **Clauses 6.4.2 & 6.4.5** – Any Assignment Instruction that has not been recorded as “client endorsed” and/or does not include all of the minimum details listed under clause 6.4.5 from (a) to (n) should be recorded as a Category 2 Non-Compliance.

6.5 Security of Information and Access Media

The contractor is required to provide a written statement confirming compliance with these clauses.

6.6 Vehicles and Drivers

The contractor is required to provide a written statement confirming compliance with these clauses.

6.7 General

These clauses do not require auditing.

COMPLIANCE WITH PSA LICENSING

7.1 Compliance with Standards

Clauses 7.1.1 and 7.1.2 do not require auditing.

Remaining clauses shall be audited in accordance with PSA 28 Auditing Guidelines.

7.2 PSA Licensing Requirements

Clause 7.2.1 is not applicable to ABs.

In respect of **Clause 7.2.2**, the auditor shall record the following basic checks:

- a) Compliance with Private Security Services Acts:
 - Are all relevant operational employees licensed?
 - Is there evidence of activity in a sector of the security industry that the contractor is not licensed to operate in?

The remaining sub-sections b), c), d), and e) do not require auditing.

PART 2 – SECURITY GUARDING SERVICES

ORGANISATION

9.1 Compliance with Legislation

Clause may be audited in accordance with PSA 28 Auditing Guidelines.

STAFFING

10.1 Terms of Employment

Clause may be audited in accordance with PSA 28 Auditing Guidelines.

OPERATIONS

11.1 Command and Control System

Clause 11.1.1 shall be audited in accordance with PSA 28 Auditing Guidelines.

The remaining clauses do not require auditing.

11.2 Operations Records

Clause 11.2.1 shall be audited in accordance with PSA 28 Auditing Guidelines.

The remaining clause does not require auditing.

11.3 Assignment Instructions

This clause shall be audited in accordance with PSA 28 Auditing Guidelines.

11.4 Security of Information and Access Media

The contractor should be asked for a written statement of compliance with:

11.4.1

11.4.2

11.4.3

11.4.4

PART 3 – DOOR SUPERVISION SERVICES

ORGANISATION

13.1 Insurance

This clause shall be audited in accordance with PSA 28 Auditing Guidelines.

13.2 Information to be given to Client

This clause shall be audited in accordance with PSA 28 Auditing Guidelines.

13.3 Risk Assessments

This clause shall be audited in accordance with PSA 28 Auditing Guidelines.

OPERATIONS

14.1 Operations Records

Clause 14.1.1 shall be audited in accordance with PSA 28 Auditing Guidelines.

Clause 14.1.2 shall be audited in accordance with PSA 28 Auditing Guidelines.

ENDS