



An tÚdarás Slándála Príobháidí
The Private Security Authority

Auditing Guidelines for Remote Audits for PSA Standards (PSA33:2014)

JULY 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 PSA33:2014 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 the auditing guidelines 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 PSA33:2014 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 client 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 undertaken by AB 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 AB 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 quotations issued in the previous 12 Months

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 PSA33:2014. 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 PSA33:2014, 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 PSA33:2014 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 PSA33:2014 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 ABs for PSA33:2014 should be used to record the details of all remote audits (i.e. *“Sample PSA 33:2014 Audit Report”*)

(5) Guidelines for Remote Audits.

The following auditing 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 clause in PSA33:2014. The PSA33:2014 audit guidelines apply to remote audits unless stated otherwise in this document.

- 2.2.2 The PSA may request ABs to focus their audit on certain areas of organisations activities. Such requests will be within the terms of PSA33:2014.
- 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 33:2014 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 fails to obtain compliance to these auditing guidelines or fails to arrange an audit for same, the AB 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 PSA33:2014, 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 AB 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 AB,
- 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 PSA33:2014 (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 PSA33:2014 issued by ABs 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 33 Auditing Guidelines.

3.2 Finances

All clauses may be audited in accordance with PSA 33 Auditing Guidelines.

3.3 Insurance

Clause may be audited in accordance with PSA 33 Auditing Guidelines.

3.4 Premises

All clauses may be audited in accordance with PSA 33 Auditing Guidelines.

3.5 Organisation Information

All clauses may be audited in accordance with PSA 33 Auditing Guidelines.

3.6 Quotations in pursuance of Contracts or Business

Clause may be audited in accordance with PSA 33 Auditing Guidelines.

3.7 Compliance with Legislation

Clause may be audited in accordance with PSA 33 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, 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
- c) A current sample Code of Conduct document.

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 4.1.4.1

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 33 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 33 Auditing Guidelines. (Content of the terms of employment to be checked)

4.3 Code of Conduct

Clause 4.3.2 shall be audited in accordance with PSA 33 Auditing Guidelines. (Content of the code to be checked)

4.4 Identification

These clauses do not require auditing.

TRAINING

5.1 Training Policy and Responsibility

These clauses shall be audited in accordance with PSA 33 Auditing Guidelines by checking the Training Policy.

5.2 Refresher Training

This clause does not require auditing.

5.3 Specialist Training

This clause does not require auditing. (Consider in the context of Covid-19 related training)

5.4 Supervisory and Management Training

This clause does not require auditing.

5.5 Training Records

All clauses may be audited in accordance with PSA 33 Auditing Guidelines.

OPERATIONS

6.1 Security

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

6.2 Specialist Knowledge

The organisation is required to provide a written statement confirming compliance with this clause.

6.3 Vehicles and Equipment

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 33 Auditing Guidelines.

7.2 PSA Licensing Requirements

Clause 7.2.1 is not applicable to ABs.

If organisation was compliant with **Clause 7.2.2** without requiring the rectification of any non-conformances at the last audit then this clause does not require auditing.

Clause 7.2.3 may be audited in accordance with PSA 33 Auditing Guidelines.

Clause 7.2.4 does not require auditing.

In respect of **Clause 7.2.5**, 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), e) and f) do not require auditing.

PART 2 –CCTV MONITORING CENTRES

Clauses 8.1.2 shall be audited.

EN 50518-1 and EN 50518-2 do not require auditing.

The following clauses of **EN 50518-3** shall be audited.

Clause 4.1 shall be audited. The auditor shall review the number of PSA licensed staff to ensure that the organisation meets the minimum staffing requirements.

Clause 5.1

Clause 5.2

Clause 5.7

Clause 8.2

Clause 8.3

Clause 8.4

Clause 8.5

Clause 8.1.3 shall be audited where required

The following clauses of **I.S.228:1997** shall be audited.

3.1 General

This clause does not require auditing.

3.1.1

This clause to be audited.

3.2.1

This clause does not require auditing.

3.2.2

This clause to be audited and all clauses mentioned under 3.2.2 and including 3.2.2.2

3.3

All clauses to be audited

3.4

All clauses to be audited

4.

All clauses to be audited.

5.

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

6.

All clauses to be audited.

PART 3 – ALARM MONITORING CENTRES

Clauses 9.1.2 shall be audited.

EN 50518-1 and EN 50518-2 do not require auditing.

The following clauses of **EN 50518-3** shall be audited.

Clause 4.1 shall be audited. The auditor shall review the number of PSA licensed staff to ensure that the organisation meets the minimum staffing requirements.

Clause 5.1

Clause 5.2

Clause 5.7

Clause 8.2

Clause 8.3

Clause 8.4

Clause 8.5

Clause 9.1.3 shall be audited where required

The following clauses of **I.S.228:1997** shall be audited.

3.1 General

This clause does not require auditing.

3.1.1

This clause to be audited.

3.2.1

This clause does not require auditing.

3.2.2

This clause to be audited and all clauses mentioned under 3.2.2 and including 3.2.2.2

3.3

All clauses to be audited

3.4

All clauses to be audited

4.

All clauses to be audited.

5.

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

6.
All clauses to be audited.

ENDS