



An tÚdarás Slándála Príobháidí  
The Private Security Authority

# Auditing Guidelines for Remote Audits for PSA Standards (PSA 57:2016)

JULY 2020

## **Auditing Guidelines for Remote Audits of Contractors who hold Temporary PSA Licences**

### **(1) Public Health Crisis (Covid-19)**

The onset of the Covid-19 lockdown resulted in a temporary suspension of certification audits for PSA licensing. This has prevented contractors who hold a temporary licence in the Electronic Security sectors from obtaining a full PSA licence.

The purpose of these auditing guidelines is to provide Auditing Bodies (ABs) with direction and guidance on the auditing of temporary licence holders in the Electronic Security Sectors. The guidelines comprise of elements which will be audited remotely and elements which will require a physical audit.

The requirement to inspect installations is a very important element of the licensing of the Electronic Security Sectors. With this in mind and conscious of the need to reduce the public health risks, the PSA has decided to reduce the number of physical installations that need to be inspected during the period to which these guidelines apply.

### **(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) Physical Audits**

For the purpose of these guidelines the number of installation to be inspected has been reduced as follows:

- a) Where a contractor has applied for an intruder alarm licence only 2 installations shall be visited.
- b) Where a contractor has applied for a CCTV licence only 2 installations shall be visited.
- c) Where a contractor has applied for a CCTV and intruder alarm licence, 1 installation in each sector shall be visited.

Auditors shall maintain social distancing at all times during the physical audit. Every effort should be made to limit person to person contact and the time spent at the site(s).

The moving from one installation site to another should be viewed as high risk. In such situations cleaning and hygiene facilities should be in place for auditors and their equipment before visiting the new site.

### **(4) Pre-Audit Considerations**

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

- 1) Can the physical audit at the location of the audits be undertaken safely? In considering this, ABs should consider;
  - i. The location of the installations,
  - ii. The persons who will be present at the time of the audit,

- iii. What hygiene measures will be followed by the auditor,
- iv. What are the risks for the auditor, the installers and the installer's clients.

In all circumstances auditors should follow the latest public health guidelines.

- 2) 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.

- 3) Has the business being impacted by the COVID-19 crisis and how has this affected installation 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.

- 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 installations completed
- list of quotations issued
- 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.

**ABs are required to document their pre-audit considerations for inspection by the PSA.**

#### **(5) 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. All material/documents for the remote audit of PSA74:2019 and PSA57:2016 shall be supplied by the contractor to the AB before a physical inspection of the installations is carried out. The operation of remote auditing will be reviewed periodically to ensure that it remains effective and adapts to any evolving business needs.

Guidance notes have been provided in sections (6) and (7) of this document in respect of each section of PSA74:2019 (section (6)) and PSA57:2016 (section (7)) 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 PSA74:2019 and/or PSA57:2016 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 templates at Annex A of the Auditing Guidelines for Certification Bodies for PSA57:2016 and Annex G of the Auditing Guidelines for Auditing Bodies for PSA74:2019 should be used to record the details of all 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 PSA74:2019. The PSA74:2019 audit guidelines apply to remote audits unless stated otherwise in this document.

## **(6) Guidelines for Remote Audits (PSA74:2019)**

2.3.2 The PSA may request ABs to focus their audit on certain areas of organisations activities. Such requests will be within the terms of PSA74:2019.

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

2.3.4 Registered legal status verified by CRO check.

2.3.5 Changes of address should be recorded.

2.3.6 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.

2.3.7 Where PSA74:2019 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.

2.3.8 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.

2.3.10 Audit reports shall be in the format set out in **Annex G of PSA 74:2019**.

2.3.11 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.

## **Absence of Contracts**

2.4 This clause may be audited according to PSA74:2019 Auditing Guidelines.

## **Audit Compliance**

- 2.5.1 Full compliance with these auditing guidelines in accordance with **2.6** must be achieved before certification can be issued.
- 2.5.2 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.
- 2.5.3 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.
- 2.5.4 When finalised audit reports should detail all non-compliances and corrective actions.

## **Audit Non-Conformances**

2.6.1 Where a contractor fails to meet any of the requirements of PSA74:2019, 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) A category 1 non-conformance is present.
  - b) 3 or more category 2 non-conformances are present.
  - c) 6 or more category 3 non-conformances are present.
  - d) 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:
  - a) Less than 3 category 2 non-conformances are present.
  - b) Less than 6 category 3 non-conformances are present.
  - c) A combination, where a) is not broken, 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.

2.6.2 Where the 5 week period referred to in **2.6.1** 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.

- 2.6.3 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**

- 2.7.1 An audit report shall be produced for each audit completed. The audit report shall include the following information:
- The name, address and contact details of the AB,
  - The name of the auditor(s) who undertook the audit,
  - The date(s) of the audit(s),
  - The name, address, contact details and PSA licence number of the contractor,
  - A summary of the audit highlighting any non-conformities found.
  - Update report on screening and training records reviewed to date (**Annex A of the AUDITING GUIDELINES FOR AUDITING BODIES FOR PSA74:2019**)
- 2.7.2 A copy of the audit report shall be sent by the AB to the PSA within 14 days of completion of the audit.

### **Certification**

- 2.8.1 All certificates for PSA74:2019 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 PSA74 Auditing Guidelines.

### **3.2 Finances**

All clauses may be audited in accordance with PSA74 Auditing Guidelines.

### **3.3 Insurance**

Clause may be audited in accordance with PSA74 Auditing Guidelines.

### **3.4 Premises**

All clauses may be audited in accordance with PSA74 Auditing Guidelines.

### **3.5 Organisation Information**

All clauses may be audited in accordance with PSA74 Auditing Guidelines.

### **3.6 Quotations in pursuance of Contracts or Business**

Clause may be audited in accordance with PSA74 Auditing Guidelines.

### **3.7 Compliance with Legislation**

Clause may be audited in accordance with PSA74 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 4.1.1.11**

**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 PSA74 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 PSA74 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 PSA74 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 PSA74 Auditing Guidelines by checking the Training Policy.

### **5.2 Induction Training**

This clause shall be audited in accordance with PSA74 Auditing Guidelines.

### **5.3 Specialist Training**

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

### **5.4 Refresher Training**

This clause does not require auditing.

### **5.5 Supervisory and Management Training**

This clause shall be audited in accordance with PSA74 Auditing Guidelines

### **5.6 Training Records**

All clauses may be audited in accordance with PSA74 Auditing Guidelines.

## **OPERATIONS**

### **6.1 Security**

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

### **6.2 Vehicles and Equipment**

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

## **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 PSA74 Auditing Guidelines.

### **7.2 PSA Licensing Requirements**

**Clause 7.2.1** is not applicable to ABs.

**Clause 7.2.2** may be audited in accordance with PSA74 Auditing Guidelines.

**Clause 7.2.3** may be audited in accordance with PSA74 Auditing Guidelines.

**Clause 7.2.4** does not require auditing.

## **(7) Guidelines for Remote Audits (PSA57:2016)**

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 PSA57:2016

The “Auditing Guidelines for Certification Bodies for Temporary Licences (PSA57:2016) document applies to remote audits unless stated otherwise in this document.

### **2. GENERAL**

#### **2.1 PSA Licensing Requirements**

Clause to be audited in accordance with auditing guidelines.

#### **2.2 Certification Bodies**

All clauses to be audited in accordance with auditing guidelines.

#### **2.3 Registration**

All clauses to be audited in accordance with auditing guidelines.

#### **2.4 Audits**

**All clauses** to be audited in accordance with auditing guidelines except **clause 2.4.5 and clause 2.4.9**

**Clause 2.4.5** does not require auditing.

**Clause 2.4.9** When a contractor has successfully completed an audit they shall be issued with a certificate of compliance/registration certifying same. Certificates shall be issued for a maximum period of **1 year**.

#### **2.5 Audit Compliance**

All clauses to be audited in accordance with auditing guidelines.

#### **2.6 Audit Non-Conformances**

All clauses to be audited in accordance with auditing guidelines.

#### **2.7 Audit Reports**

All clauses to be audited in accordance with auditing guidelines.

### **3. COMPLIANCE WITH PSA LICENSING**

#### **3.1 Compliance with Intruder Alarm Standards**

**Clauses 3.1.1 and 3.1.3** to be audited in accordance with auditing guidelines.

**Clause 3.1.2** Audits shall comprise of visits to **2** alarm installation sites.

#### **3.2 Compliance with CCTV Standard**

**Clauses 3.2.1 and 3.2.3** to be audited in accordance with auditing guidelines

**Clause 3.2.2** Audits shall comprise of visits to 2 CCTV installation sites.

Where a contractor has applied for a licence in the CCTV and intruder alarm sectors a visit to 1 intruder alarm and 1 CCTV installation site shall take place.

#### **3.3 Compliance with SR40**

This section no longer applies.

#### **3.4 Compliance with PSA Licensing**

All clauses to be audited in accordance with auditing guidelines.

**ENDS.**