

# AUDITING GUIDELINES FOR

# **CERTIFICATION BODIES**

**FOR** 

**PSA 28:2013** 

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### 1. AUDITING GUIDELINES

The Government of Ireland through the Private Security Services Act, 2004, established the Private Security Authority (PSA) as the national regulatory and licensing body for the private security industry. Amongst the areas regulated by the PSA are the Door Supervisor and Security Guarding sectors. The PSA has prescribed *PSA Licensing Requirements - Door Supervision and Security Guarding (PSA 28:2013)* as the standard to be observed by contractors in both sectors.

These guidelines set out the auditing requirements to be followed by approved certification bodies when auditing organisations in the Door Supervisor and Security Guard sectors for *PSA 28:2013* certification. The guidelines should be read in conjunction with the PSA requirements document *PSA Licensing Requirements - Door Supervision and Security Guarding (PSA 28:2013)*.

The guidelines will be reviewed on a regular basis and updated versions will be provided to certification bodies and made available on our website, www.psa.gov.ie.

Certification bodies are required to share auditing information on contractors who apply for a PSA licence. Certification bodies should ensure that any contracts or other arrangements entered into with contractors provide for the sharing of this information with the PSA.

# 2. GENERAL

### 2.1 PSA Licensing Requirements

The PSA requirements document "PSA Licensing Requirements - Door Supervision and Security Guarding (PSA 28:2013)", hereinafter referred to as PSA 28:2013, sets out the requirements to be achieved and maintained by contractors applying for a licence from the PSA in the Door Supervisor and Security Guarding sectors.

Contractors seeking a licence from the PSA must comply with PSA 28:2013. A contractor's compliance shall be assessed against the requirement document by PSA approved certification bodies in accordance with these guidelines.

Certification bodies must agree in writing to be bound by these auditing guidelines before the PSA will accept evidence of certification from them.

### 2.2 Audits

**2.2.1** Contractors shall be subject to an audit by an approved certification body at least once every 12 months or at such intervals as the PSA may prescribe. The purpose of the audit is to verify compliance with PSA 28:2013.

Non Compliance: Category 1

- **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 involve a visit to the contractors address as stated on their PSA licence.

Where the address visited is not as stated on the licence, the auditor shall confirm that the address on the licence is the registered address of the organisation. If it is not the registered address this should be recorded in the audit report. In such instances the address visited should be the administrative office of the organisation.

Where the address on the licence is outside of Ireland a visit to the contractor's administrative office in Ireland shall occur. Where the overseas office has access to Irish client files the organisation must provide a statement confirming that the requirements of PSA 28:2013 are being met.

Where the administrative address is outside of Ireland, a visit to the address outside of Ireland shall take place.

Where an organisation has more than one administrative office all records required for audit purposes should be made available at a single location on the date(s) of the audit. If this is not possible, audits should rotate between the different administrative offices of the organisation.

**2.2.4** Organisations that change their legal status shall be subject to an audit. A change in legal status includes changing from a sole trader to a company, sole trader to partnership, partnership to company or unlimited company to limited

company.

Where a merger of two businesses takes place and a new entity formed an audit is required.

An audit is not required where;

- (a) one organisation takes over another organisation, both organisations are PSA licensed and there is no change in the legal status of the first organisation.
- (b) where a change in legal status occurs and all partners, directors and shareholders of the new entity were vetted by the PSA as part of the previous entity or entities.
- **2.2.5** Organisation that change address shall be subject to a visit at their new address before their certification can be amended. Whether this is done by an auditor or PSA Inspector will be determined by the position in the audit cycle.

If an audit is due within 3 months, the date of the audit may be brought forward and an examination of the new address undertaken. Where applicable, the audit should ensure that the new address meets the requirements for command and control systems and premises.

To avoid placing additional cost on an organisation by requiring audit by a certification body in the period between audits, the PSA Inspector may be requested to undertake an inspection.

- **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.

In selecting records or documents auditors shall select a large enough sample as to be satisfied that a representative selection has been chosen. Auditors shall, where possible, select different samples at subsequent 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 25 the Auditor may stop at 25 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 be issued for a maximum period of 2 years.
- **2.2.9** When an audit has been completed the certification body shall notify the PSA of same and provide a copy of the audit report to the PSA on request. The

certification body will provide non conformance reports to the PSA on a quarterly basis.

Note: Provision of a copy of the certificate of compliance/registration shall be accepted as notification.

- 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.

Non Compliance: Category 1

**2.2.12** Where a contractor fails to obtain full compliance to PSA 28:2013 or fails to arrange an audit for same, the certification body shall notify the PSA.

### 2.3 Audit Compliance

- **2.3.1** Full compliance with PSA 28:2013 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 requirements document, 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, e.g. email, re-visit, etc.
- **2.3.4** When finalised audit reports should detail all non-compliances and corrective actions.

### 2.4 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 nonconformances 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 nonconformances 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.

### 2.5 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)
- **2.5.2** A copy of the audit report shall be sent by the certification body to the PSA upon request. The report should be submitted with 14 days of receipt of such a request.

### 2.6 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.

### **PART 1 – COMMON PROVISIONS**

# 3. ORGANISATION

# 3.1 Ownership

**3.1.1** The name and contact details of each person who owns part of the organisation or who has control over the organisation shall be recorded in the audit report together with the name and contact details of the organisation's management.

Where the company is a PLC details of shareholdings are not required. However, details of senior management responsible for the licensable sectors should be recorded.

Non Compliance: Category 3

**3.1.2** The names and contact details of all directors including the company secretary shall be recorded.

The results of the screening of principals and directors including the company secretary shall be audited for compliance with screening requirements. The audit report shall confirm that screening requirements were met. Where a director and/or the company secretary has been with the organisation for a period in excess of 5 years no further screening is required. A declaration attesting to this must be signed by the organisations accountant or solicitor. (Annex C)

Non Compliance: Category 1 for breaches of screening requirements

**3.1.3** The auditor shall be provided with the name and PSA licence number of any director of the organisation who is also an operational employee of the organisation. The PSA licence of such directors shall be inspected. The names of such directors and the details of their PSA licence should be recorded in the audit report.

If, on the day of the audit, the PSA licence of a director is not available because the director is on operational duties, a copy of the licence may be inspected.

Non Compliance: Category 1

**3.1.4** The organisation shall confirm to the auditor if any principal or director is or has been a bankrupt. If confirmed, details of the bankruptcy shall be inspected in the organisation's files and the name of the person involved and the period of the bankruptcy recorded in the audit report.

Non Compliance: Category 3

**3.1.5** The organisation shall confirm to the auditor if any of the principals hold a beneficial interest in any other organisation subject to licensing by the PSA. If confirmed the details shall be inspected and the names, contact details of such principals and details of the other licensed entity shall be recorded.

Non Compliance: Category 3

**3.1.6** The auditor shall be provided with the name and PSA licence number of all operational supervisory and management staff who undertake licensable activities. These details should be recorded in the audit report.

Non Compliance: Category 1

**3.1.7** The organisation shall confirm to the auditor the name and contact details of any person who is a beneficiary of the organisation or any person that may hold a material interest in the organisation and who has not been identified at **3.1.1** or **3.1.2**. The details of such persons shall be recorded by the auditor in the audit report.

Non Compliance: Category 1

**3.1.8** The organisation shall provide the auditor with a detailed organisational chart showing all persons involved in the management and operation of the business, and to include all persons and third parties, including consultants, providing regular ancillary services to the business such as sales, client liaison, consultancy services, payroll, training and accounting services.

In the cases of services provided by third parties it is sufficient to record the name of the third party on the organisation chart. A copy of the organisation chart should be attached to the audit report.

Non Compliance: Category 3

### 3.2 Finances

- **3.2.1** The auditor shall inspect the organisation's tax clearance certificate and verify that it relates to the organisation and is in date. The following details from the tax clearance certificate shall be recorded in the audit report.
  - Tax Certificate Number
  - Issue Date
  - Valid Until Date

If the organisation has applied for a tax clearance certificate but has not obtained one because of delay by the Revenue Commissioners, the organisation may receive additional time to obtain same. Evidence that an application has been made to the Revenue Commissioners must be provided before such an extension is granted.

The PSA will provide guidance to the certification bodies on the time periods permitted.

- **3.2.2** The organisation shall confirm in writing to the auditor whether or not there are any loans to the organisation from the directors and/or shareholders. The auditor shall verify that all such loans are recorded in the organisation's accounts as loan capital. The following details shall be recorded in the audit report.
  - Date of loan
  - Amount of loan
  - Who the loan is from
  - Amount of any repayments made
  - Date of repayments
  - Amount outstanding at time of audit

Non Compliance: Category 2

- **3.2.3** Cash flow statements shall be requested from:
  - New organisations who are having their first PSA 28 audit,
  - Organisations who are unable to provide a tax clearance certificate within the agreed timeframes
  - Organisations where the PSA request one be provided as part of the audit.

The auditor shall inspect the organisation's cash flow statement for the current accounting period and for new organisations the cash flow forecast for the first 12 months. A copy shall be attached to the audit report.

Non Compliance: Category 2

**3.2.4** The organisation shall provide the auditor with a statement signed by a principal of the organisation which details all persons who are the signatories to the organisations bank accounts. The statement shall be attached to the audit report.

Non Compliance: Category 2

### 3.3 Insurance

- **3.3.1** The auditor shall inspect the organisation's insurance policy and certificate of insurance and verify that the cover is relevant to the nature of the business. The audit report shall record which of the following are covered and the maximum liability in each area.
  - Employer liability and public liability
  - Motor insurance
  - Deliberate act
  - Fidelity
  - Defamation
  - Efficacy
  - Consequential loss of keys
  - Wrongful arrest
  - Professional indemnity
  - Other (please specify)

In the case of deliberate act insurance the organisation shall provide written evidence from their underwriter/broker that all venues where a DSP service is provided are covered.

Non Compliance: Category 1

### 3.4 Premises

**3.4.1** The auditor shall visit the administrative office of the organisation and confirm that all records, business documents, certificates, correspondence and files necessary for the proper conduct of business are kept in a secure confidential manner.

Where records are maintained on computer based systems the auditor shall request evidence from the organisation that all firewalls and other security systems are current and within licence.

Non Compliance: Category 2

**3.4.2** The auditor shall confirm that the administrative office at 3.4.1 is protected by an intruder alarm system which has been installed and maintained in accordance with prevailing PSA requirements. The auditor shall inspect the organisation's written records and confirm that it contains the name, address and contact number of the intruder alarm installer as well as details of the maintenance and service history. The name and PSA licence number of the installer shall be recorded in the audit report.

Where the administrative office is located outside of Ireland the alarm shall be installed and maintained in accordance with EN 50131 or equivalent standard.

Non Compliance: Category 2

- **3.4.3** The auditor shall confirm that the alarm is remotely monitored by one of the following:
  - (a) a PSA licensed monitoring centre. The auditor shall inspect the organisation's written record of the name, address and contact number of the monitoring centre providing this service. The name and PSA licence number of the monitoring centre shall be recorded in the audit report.
  - (b) a monitoring centre certified to EN 50518 or equivalent standard where the administrative office is located outside of Ireland.
  - (c) a security guard (static) service provided at the premises where the administrative office is located where this security guard service monitors the intruder alarm on the premises.
  - (d) a monitoring service where the alarm activation triggers a phone message to 3 or more contact persons as part of a loop system. The name and contact details of these individuals should be recorded in the audit report.

Note: where a contractor is licensed for the first time after 1 January 2015, option (d) above does not apply

# 3.5 Organisation Information

**3.5.1** The auditor shall inspect the organisation's letterheads, advertising, promotional documentation and contracts and confirm the presence of the organisations PSA licence number(s) for all categories for which the organisation is licensed.

The auditor shall select at random a contract to confirm this requirement is met with regards to contracts.

If the organisation provides licensable activities in a sector for which it does not hold a licence this shall be brought to the attention of the organisation and the PSA.

Non Compliance: Category 3

**3.5.2** For the purposes of 3.5.2 and 3.5.3, the auditor shall select at random a sample of contracts for inspection.

Where the provision of a contract is required by a client the auditor shall inspect the organisation's written contracts and confirm that it includes the following for the provision of the service:

- Total Costing of the service (including VAT)
- The arrangements for payment
- Obligations to the client (surveys, assignment instructions, compliance with industry standards or codes of practice)
- Sub-contracting agreements where applicable
- Period of contract (including reference to requirements for termination and any
- Agreed levels of response, means of reporting and exchange of information associated exclusions, penalty clauses or restrictions)
- Safety Statement
- Complaints procedures and complaints management procedures
- Agreed scope of service to be provided

Non Compliance: Category 2

**3.5.3** The auditor shall confirm that contracts are signed by a principal of the organisation and by the client and a copy retained by the organisation. Where the client has not signed the contract the auditor shall confirm that evidence of postage of the contract to the client by registered post/e-mail delivery is available.

Non Compliance: Category 2

**3.5.4** Where the organisation has engaged a sub-contractor to provide licensable services to a client the auditor shall record details of the sub-contractors name, PSA Licence number and expiry date in the audit report.

Where unlicensed contractors have been used the certification body shall record details in the audit report and brought to the attention of the PSA.

# 3.6 Quotations in pursuance of Contracts or Business

**3.6.1** The auditor shall select at random a sample of written quotations and confirm that they comply with the requirements of clauses **3.6.1** and **3.6.2** of PSA 28:2013.

Non Compliance: Category 2

# 3.7 Compliance with Legislation

- **3.7.1** The organisation shall provide the auditor with a current statement, signed by a principal of the organisation, confirming compliance with all relevant legislation and shall state specifically its compliance, where relevant, with the following:
  - Health, Safety and Welfare at Work Act(s).
  - Organisation of Working Time Act(s).
  - Private Security Services Acts.
  - Data Protection Acts.
  - Taxation and Social Welfare Acts.
  - Payment of Wages Act
  - Immigration Acts.

The statement (**Annex D**) shall be dated within 2 weeks prior to the audit date and shall be attached to the audit report.

Health, Safety and Welfare at Work Act(s): Organisations are required to keep recorded evidence that each employee is aware of Health & Safety Policy.

Organisation of Working Time Act(s): A number of employee records (timesheets/rosters) should be inspected to ascertain the number of hours worked over a period of time.

Non Compliance: Category 2

**3.7.2** The organisation shall provide the auditor with a statement, signed by the principal of the organisation confirming compliance with all current legally enforceable agreements or legislation in respect of rates of pay and all associated conditions.

The statement shall be dated within 2 weeks prior to the audit date and shall be attached to the audit report. The statement may form part of the statement provided at 3.7.1. The auditor shall inspect payroll records to verify compliance with clause 3.7.2 of PSA 28:2013

# 4. STAFFING

# 4.1 Selection and Pre Employment Screening

### 4.1.1 General

**4.1.1.1** The auditor shall inspect the organisation's pre employment records to confirm enquiries in respect of competency and good character have been completed.

Non Compliance: Category 3

**4.1.1.2** The auditor shall inspect the organisation's pre employment records and confirm the required screening of all relevant persons offered employment. In addition to persons providing licensable activities, relevant persons includes any person who will have access to details of security duties, assignment instructions, security services provided to clients as well as any person supervising relevant persons.

When selecting records for inspection auditors should not limit the selection to persons providing licensable activities. Persons in all relevant employment areas should be included.

Non Compliance: Category 1

**4.1.1.3** The auditor shall confirm the existence of personnel files for persons subject to screening and shall confirm that records previously examined continue to be maintained. The personnel file checklist at **Annex E** of the auditors report should be completed.

Non Compliance: Category 1

**4.1.1.4** The auditor shall inspect the personnel files and confirm that they include the required statement of authorisation and acknowledgement document signed and dated by employees in accordance with clause **4.1.1.4** of PSA 28:2013 requirements.

Non Compliance: Category 2

**4.1.1.5** The auditor shall confirm that, in the case of provisional employment, the time period has not exceeded 9 months.

Non Compliance: Category 3

**4.1.1.6** The auditor will inspect the certified copies of relevant personnel and screening documentation held on the personnel file.

**4.1.1.7** The auditor will include in the inspection the personnel files of part-time employees and directors and confirm that such files include completed screening records.

Non Compliance: Category 1

**4.1.1.8** The auditor will include in the inspection the personnel files of temporary and ancillary staff engaged in relevant employment and confirm that such files include completed screening records.

Non Compliance: Category 1

**4.1.1.9** The auditor shall confirm that screening periods are in accordance with clause **4.1.1.9** of PSA 28:2013.

Non Compliance: Category 1

**4.1.1.10** The organisation shall confirm that employees involved in licensable activities are over 18 years of age and provide a list of all employees involved in licensable activities who are over the age of 65. The auditor shall confirm that a fitness for duty certificate exists for each employee over the age of 65.

Note: Employees involved in licensable activities who are over the age of 65 shall provide a fitness for duty certificate within 6 weeks of turning 65 and at yearly intervals thereafter. Certificates should be signed and stamped by a medical practitioner.

Non Compliance: Category 2

**4.1.1.11** The auditor shall inspect the organisations provisional employment procedures to ensure the satisfactory monitoring and supervision of such personnel during the provisional period of employment.

Non Compliance: Category 1

**4.1.1.12** The auditor shall confirm that screening has been completed within the time frame required in clause **4.1.1.12** of PSA 28:2013.

Non Compliance: Category 1

**4.1.1.13** The auditor shall confirm that where screening for a shorter period has occurred it is carried out in accordance with clause **4.1.1.13** of PSA 28:2013.

Non Compliance: Category 1

**4.1.1.14** Where applicable, auditors shall confirm that employees have provided permissions to former employers as required in accordance with clause **4.1.1.14** of PSA 28:2013.

- **4.1.1.15** In the case of gaps in the screening record which cannot be independently verified organisations may obtain written statements from personal referees provided that:
  - the referee has personal knowledge of the person being screened;
  - except in the case of a family run business, the referee is not a family member or personal friend of the employee,
  - the screening is on a month to month basis for the period concerned;
  - -.the organisation has verified the details of the statements and referees.

In such circumstances the auditor shall inspect the written statements from the personal referees and be satisfied that the above requirements are met.

Non Compliance: Category 1

### 4.1.2 Pre Employment Interview

- **4.1.2.1** The auditor shall inspect the pre employment interview record and confirm the inclusion of the following documentation:
  - Details of previous employers and employment dates,
  - · Contact details for previous employers,
  - Dates of unemployment,
  - Applicant's current address,
  - Dates of education.

Non Compliance: Category 2

**4.1.2.2** The auditor shall confirm that the personal interview has been carried out in accordance with clause **4.1.2.2** of PSA 28:2013.

Non Compliance: Category 2

**4.1.2.3** The auditor shall confirm that interview notes are held on the personnel file and that the requirements of clause **4.1.2.2** of PSA 28:2013 have been met.

Non Compliance: Category 2

### 4.1.3 Character and other References

**4.1.3.1** The auditor shall inspect the personnel file to ensure full compliance with the screening requirements set out in clause **4.1.3.1** of PSA 28:2013. Where a continuous screening record cannot be obtained the requirements of clause **4.1.1.15** shall apply.

Non Compliance: Category 1

**4.1.3.2** The auditor shall confirm that where references have been taken by phone the requirements set out in clause **4.1.3.2** of PSA 28:2013 have been followed.

**4.1.3.3** The auditor shall inspect the third party documents provided for screening purposes and confirm that they are in accordance with clause **4.1.3.3** of PSA 28:2013.

Non Compliance: Category 1

**4.1.3.4** The auditor shall confirm that the questionnaire on medical history and present general health has been completed.

Non Compliance: Category 3

### 4.1.4 Evidence of Qualifications/Awards

**4.1.4.1** The auditor shall confirm that relevant qualifications/awards have been received. Where possession of a PSA Licence is used as evidence of holding the required awards, the auditor shall confirm that the licence details were provided prior to employment commencing.

Non Compliance: Category 1

### 4.1.5 Work Permits, Authorisations and Permissions

**4.1.5.1** The auditor shall inspect the organisation's register of employees who have applied for or hold permission to work in the State and confirm that the organisation is compliant with all requirements of clause **4.1.5**. The register should contain details of the PSA licence number and expiry date of all those on the register.

Non Compliance: Category 2

**4.1.5.2** The auditor shall confirm that all necessary records associated with the required documentation for work visa applications and permissions to work are in place.

Non Compliance: Category 2

**4.1.5.3** The auditor shall confirm that all permissions to work in the State are current.

Non Compliance: Category 1

### 4.1.6 Maintenance and Retention of Records

**4.1.6.1** The auditor shall inspect the records of employees details and confirm that they comply with the requirements contained in clause **4.1.6.1** of PSA 28:2013.

Non Compliance: Category 2

**4.1.6.2** The organisation shall provide the auditor with details of the storage arrangements for employee records. Where records are accessed by computer this shall include details of firewalls and other security measures. The auditor shall satisfy themselves that such storage arrangements are in accordance with clause

**4.1.6.2** of PSA 28:2013. The auditor shall ensure that the organisation's processes are in line with Information Note PSA 36, see **Annex F**.

Non Compliance: Category 2

**4.1.6.3** The auditor shall confirm that details of current employees are held in accordance with clause **4.1.6.3** of PSA 28:2013.

Non Compliance: Category 2

### 4.1.7 Screening and Acquired Companies

**4.1.7.1** Where applicable, the auditor shall confirm that screening has taken place in accordance with clause **4.1.7.1** PSA 28:2013.

Non Compliance: Category 1

# 4.2 Terms of Employment

**4.2.1** The auditor shall confirm that employees receive a contract of employment and staff handbook.

Note: Contracts of employment may not be required in TUPE arrangements.

Non Compliance: Category 1

**4.2.2** The auditor shall confirm that terms of employment are in accordance with clause 4.2.2 of PSA 28:2013.

Organisations are required to produce written evidence that employees have either been shown the organisations policies in relation to recruitment, equality, communications, etc., or have been provided with copies of same.

Note: Any probationary period under **4.2.2** (c) should not exceed the provisional employment periods set out at **4.1.1.5** of PSA 28:2013.

Non Compliance: Category 2

### 4.3 Code of Conduct

**4.3.1** The auditor shall confirm that the organisation's code of conduct is in accordance with clause **4.3.1** of PSA 28:2013.

Non Compliance: Category 2

**4.3.2** The auditor shall inspect personnel files and confirm that the code of conduct has been signed by employees including any employees who have joined the organisation under the Transfer of Undertakings (Protection of Employment) Regulations (TUPE).

### 4.4 Identification

**4.4.1** The auditor shall confirm that the organisation complies with the requirements on identity badges contained in clause **4.4.1** of PSA 28:2013.

Non Compliance: Category 1

**4.4.2** The organisation shall provide evidence that all employees have been instructed on PSA requirements for wearing an identity badge.

Non Compliance: Category 2

**4.4.3** Where the organisation provides its own identity badges the auditor shall confirm that the identity badge is reviewed in accordance with clause **4.4.3** of PSA 28:2013.

Non Compliance: Category 2

**4.4.4** Where the organisation provides its own identity badges the auditor shall inspect the organisation's arrangements for the withdrawal of organisation issued identity badges from employees.

Non Compliance: Category 3

### 4.5 Uniform

**4.5.1** The auditor shall inspect a specimen of the organisation's uniform and confirm that it meets the requirements contained in clause 4.5.1 of PSA 28:2013. If a specimen of the uniform has previously been inspected at an audit a photograph of the uniform is permitted provided there have been no changes since the last audit.

The organisation shall provide the auditor with details of all clients who have requested that the organisation's uniform is not worn. The auditor shall confirm that a written record of such requests has been received from clients.

Non Compliance: Category 2

**4.5.2** The auditor shall confirm that the uniform is readily distinguishable from a member of the civil protection services.

Non Compliance: Category 3

**4.5.3** The auditor shall confirm that the organisation's insignia is clearly visible in accordance with clause **4.5.3** of PSA 28:2013.

Non Compliance: Category 3

**4.5.4** The organisation shall advise the auditor on its procedures for the renewal of uniforms.

- **4.5.5** The introduction of clause **4.5.5** of PSA 28:2013 has been delayed until the 1<sup>st</sup> May 2015.
- **4.5.6** The introduction of clause **4.5.6** of PSA 28:2013 has been delayed until the 1<sup>st</sup> May 2015.

### 4.6 Threats and Violence

**4.6.1** The auditor shall inspect the risk mitigating measures contained in the organisation's site risk assessment survey. The organisation shall confirm if the risk mitigating measures have been implemented.

Where an organisation has multiple sites a sample across a range of site types should be selected.

Organisations may undertake their own risk assessments and safety statements provided they have the competence and expertise to do so.

Non Compliance: Category 1

**4.6.2** The auditor shall confirm that where the risk mitigating measures include special training and safety routines that these have taken place.

Non Compliance: Category 1

**4.6.3** The auditor shall confirm that safety routines are continuously updated where necessary and that employees are informed, trained and educated as required in clause **4.6.3** of PSA 28:2013.

Non Compliance: Category 2

**4.6.4** The organisation shall provide details of the additional supports that have been provided where a risk of recurring violence has been identified. The auditor shall confirm that a mechanism for calling assistance is in place.

Non Compliance: Category 2

**4.6.5** The organisation shall provide evidence that two or more operatives have been assigned to tasks where a high risk of violence has been identified. The auditor shall inspect rosters to confirm that this requirement is being met.

Non Compliance: Category 2

**4.6.6** The auditor shall inspect the organisation's records of incidents involving violence and confirm that the organisation has investigated such incidents. Where remedial action has been recommended the auditor shall confirm that such recommendations have been implemented.

**4.6.7** The organisation shall provide details of support procedures in place for employees who have been subjected to violence in the course of carrying out their duties.

# 5. TRAINING

# 5.1 Training Policy and Responsibility

**5.1.1** The auditor shall inspect the organisation's training policy document and verify that it has been authorised at senior management level within the organisation. The policy shall comply with the training requirements contained in clause **5.1.4** of PSA 28:2013.

Non Compliance: Category 1

**5.1.2** The organisation shall advise the auditor of the name of the person appointed as the training administrator. The name together with any relevant qualifications shall be recorded in the audit report.

Non Compliance: Category 3

**5.1.3** The auditor shall inspect and confirm that verified records of all training are held by the organisation.

Note: The PSA recommends that employees training records should be held with their personnel file.

Non Compliance: Category 2

# 5.2 Induction Training

**5.2.1** The auditor shall inspect the content of the organisations induction session and confirm that it meets the requirements set out in clause **5.2.1** of PSA 28:2013.

Non Compliance: Category 3

**5.2.2** The auditor shall inspect employee records and confirm that employees received the induction training prior to commencing operational duties and have signed a declaration confirming same.

Note: Under TUPE arrangements induction training may be provided after commencing duties.

Non Compliance: Category 2

**5.2.3** The auditor shall confirm that the training was provided by a competent member of staff.

Note: For the purposes of induction training a competent member of staff is a member of staff in a management or human resources role.

# 5.3 Site Related Training

**5.3.1** The auditor shall confirm that facilities exist for familiarisation procedures and training of employees going to a first assignment or transferring between assignments.

The auditor shall confirm that the training was provided by a qualified trainer or experienced member of staff and that a record of the training is contained in the employees file.

Note: For the purposes of site related training an experienced member of staff is a member of staff in a supervisory or management role who has been employed by the organisation for a minimum of 2 years or since the organisation commenced operations, whichever is the shorter.

Non Compliance: Category 2

**5.3.2** The auditor shall inspect rosters to confirm that employees receiving on site training were treated as supernumerary to that site.

Non Compliance: Category 2

**5.3.3** The auditor shall confirm that site specific training plans are in place.

Non Compliance: Category 2

**5.3.4** The auditor shall confirm that training was provided to employees in accordance with the requirements of the site-specific training plans.

Note: Under TUPE arrangements site specific training may be provided after commencing duties.

Non Compliance: Category 2

**5.3.5** The auditor shall inspect the records of site-specific training and confirm that the training was provided by a competent member of staff.

Note: For the purposes of site related training a competent member of staff is a member of staff in a supervisory or management role who has been employed by the organisation for a minimum of 2 years or since the organisation commenced operations, whichever is the shorter.

# 5.4 Basic Training

**5.4.1** The auditor shall inspect the basic training qualifications of all operational security staff and confirm that they are qualified for the service provided as follows:

Door Supervisor: Door Security Procedures QQI Level 4 Minor Award (4N1114) or

equivalent.

Security Guard: Guarding Skills QQI Level 4 Minor Award(4N1118) or equivalent.

Evidence of a valid PSA licence may be accepted as confirmation that relevant staff have required qualifications.

Non Compliance: Category 1

# 5.5 Trainers and Training

**5.5.1** The auditor shall record in the audit report the name and qualifications held by the organisation's qualified trainer and confirm that the trainer meets the definition contained in clause **2.19** of PSA 28:2013

Non Compliance: Category 1

**5.5.2** The auditor shall confirm that all other persons providing training in accordance with clause **5.5.2** of PSA 28:2013 meet the requirements set out in these auditing guidelines.

Non Compliance: Category 2

# 5.6 Specialist Training

**5.6.1** The auditor shall inspect the training records and confirm that employees required to carry out duties or use equipment of a specialist nature have been certified as having received this training.

Non Compliance: Category 2

**5.6.2** The auditor shall confirm that any additional training required as a result of a risk assessment carried out under clause **6.1.1** of PSA 28:2013 has been provided by a competent person.

Non Compliance: Category 2

**5.6.3** Where applicable, the auditor shall inspect the first aid training records for employees and confirm the name and Quality and Qualifications Ireland (QQI) qualification of the trainer.

# 5.7 Refresher Training

**5.7.1** The auditor shall inspect the training records and confirm that refresher training is carried out and recorded in accordance with clause **5.7.1** of PSA 28:2013.

Note: The PSA has established a working group on training. It is expected that this group will, in due course, set out requirements for refresher training. The auditing guidelines will be updated to take account of these requirements.

Non Compliance: Category 2

# 5.8 Supervisory and Management Training

**5.8.1** The auditor shall inspect the organisation's supervisory and management training records and confirm that they are in accordance with clause **5.8.1** of PSA 28:2013

Note: The PSA has established a working group on training. It is expected that this group will, in due course, set out requirements for supervisory and management training. The auditing guidelines will be updated to take account of these requirements.

Non Compliance: Category 2

# 5.9 Training Records

**5.9.1** The auditor shall inspect the organisation's training records and confirm that they are maintained in accordance with clauses **5.9.1**, **5.9.2**, **5.9.3**, **5.9.4** and **5.9.5** of PSA 28:2013.

# 6. OPERATIONS

### 6.1 Risk Assessments

**6.1.1** The auditor shall inspect the organisation's risk assessment surveys and confirm that they have been undertaken for each site.

Auditors may choose a random selection of surveys where the volume dictates. In selection surveys, the auditor should in the first instance, check the surveys for those contracts which have been inspected under clause **3.5.2** of PSA 28:2013.

Non Compliance: Category 1

**6.1.2** The auditor shall confirm that the risk assessments are in compliance with the risk assessment guidelines contained in **Annex C** of PSA 28:2013.

Non Compliance: Category 1

# 6.2 Command and Control System

**6.2.1** The auditor shall inspect the organisation's command and control facilities and confirm that they meet the requirements contained in clause **6.2.1** of PSA 28:2013.

Non Compliance: Category 1

**6.2.2** The auditor shall confirm the type(s) of command and control system(s) provided by the organisation and confirm that clients have been provided with these details.

Command and control systems shall consist of at least one of the following:

- (a) Dedicated fixed location.
- (b) Contracted facility.
- (c) Shared 3rd party facility.

Where the level of service does not allow for the provision of one of the systems above the Organisation may:

- (i) designate either a manned site or mobile unit as a command and control system. The provisions of clause **6.2.3** shall apply to such a command and control system. In addition the following requirement shall apply to such a command and control system:
  - a back-up communications system shall be in place,
  - check-in calls shall be made at least once every two hours or such shorter periods as may be required by a risk assessment,
  - a register of all check-in calls and incident details shall be maintained,
  - clearly defined procedures shall be in place for dealing with instances when check-in calls are not made as scheduled,
  - clearly defined procedures shall be in place for dealing with instances when the command and control system cannot be contacted. The

- procedures shall include a default contact to a manned centre.
- where a safe is installed in a vehicle it shall be certified to comply with EN 14450, Class S1 with an EN 1300 certified Class A Lock provided for the safety of documents and keys and it shall be bolted to the side adjacent to the cab or the floor.
- the provision of the command and control system shall not diminish the provision of service to a client, endanger the health or safety of staff or negate the requirements of PSA licensing.
- phone records from the phone provider for a period of two years shall be maintained to verify details of check-in calls.
- where check-in calls are made by means other than phone a similar system of verification shall be maintained.
- a record of the phone/communication device allocated to each staff member shall be maintained for a minimum of 2 years.

Or

- (ii) designate a looped check-in call system as a command and control system. The provisions of clause **6.2.3** shall apply to such a command and control system. In addition to the looped check-in call system the following requirements shall apply:
  - a back-up communications system shall be in place,
  - check-in calls shall be made at least once every two hours or such shorter periods as may be required by a risk assessment,
  - a register of all check-in calls and incident details shall be maintained,
  - clearly defined procedures shall be in place for dealing with instances when check-in calls are not made as scheduled.
  - clearly defined procedures shall be in place for dealing with instances when check-in calls are not answered. The procedures shall include a default contact to a manned centre.
  - where a break in the looped system occurs procedures for making contact with the absent staff member shall be activated immediately. Such procedures shall include a physical check on the location of the staff member.
  - the provision of the looped check-in system shall not diminish the provision of service to a client, endanger the health or safety of staff or negate the requirements of PSA licensing.
  - phone records from the phone provider for a period of two years shall be maintained to verify details of check-in calls.
  - where check-in calls are made by means other than phone a similar system of verification shall be maintained.
  - a record of the phone/communication device allocated to each staff member shall be maintained for a minimum of 2 years.

Note: In relation to door security and retail security staff a check in call must be made at the start and end of each shift

Non Compliance: Category 1

**6.2.3** The auditor shall confirm that the organisation's command and control system meets the requirements contained in clause **6.2.3** of PSA 28:2013. In this regard

particular attention shall be taken of the following:

- the manning of the command and control system shall be sufficient to meet the demands placed on it, including out of office hours and weekends.
   rosters should be checked to confirm manning levels.
- first aid and fire fighting equipment. The service records of any equipment requiring regular maintenance should be inspected.
- annual review and update of system information and procedures.
- command and controls system manual covering all foreseeable contingencies available to controllers and meeting the requirements of subclauses **6.2.3(e)** to **6.2.3(g)** of PSA 28:2013.
- the procedures to be followed by management in relation to incidents and the supports available to staff.
- details of command and control practice drills.

Non Compliance: Category 1

**6.2.4** Where operated by the organisation, the auditor shall visit dedicated fixed location command and control facilities and confirm that the requirements in clause **6.2.4** of PSA 28:2013 are met.

Non Compliance: Category 2

**6.2.5** Where contracted command and control facilities are used, the auditor shall inspect the organisation's report on the suitability of the facilities available. Such report should include details of the physical security of the premises and the procedures in place to protect clients details. The organisation should undertake a review of the facility once each year to ensure that it complies with the requirements of clause **6.2** of PSA 28:2013.

The name of the contractor operating the facility, their address and where applicable, their PSA licence number should be recorded in the audit report.

Non Compliance: Category 2

**6.2.6** Where a shared third party command and control facility is used, the auditor shall inspect the organisation's documents on the physical security of the premises and the procedures in place to protect clients details. The organisation should undertake a review of the facility once each year to ensure that it complies with the requirements of clause **6.2** of PSA 28:2013.

The name of the third party operating the facility, their address and where applicable, their PSA licence number should be recorded in the audit report.

Non Compliance: Category 2

**6.2.7** The auditor shall confirm that the organisation holds an up to date client list in accordance with the provisions of clause **6.2.7** of PSA 28:2013 and that the list is secure and access restricted in accordance with said clause.

**6.2.8** The auditor shall confirm that the secure housing of the list referred to in clause **6.2.7** complies with the requirements contained in clause **6.2.8** of PSA 28:2013.

Non Compliance: Category 2

# 6.3 Operations Records

**6.3.1** The auditor shall inspect the operations records and confirm that operational staff have been made aware in writing of the reporting structure in case of urgent and non urgent issues as required by clause **6.3.1** of PSA 28:2013.

Non Compliance: Category 2

**6.3.2** The auditor shall inspect the records of incident reports and confirm that the requirements of clause **6.3.2**, **6.3.3** and **6.3.4** of PSA 28:2013 are met. Any incident not recorded should be detailed in the audit report.

Non Compliance: Category 2

- **6.3.3** See **6.3.2** above.
- **6.3.4** See **6.3.2** above.
- **6.3.5** The auditor shall inspect the organisation's escalation policy document for client liaison.

Non Compliance: Category 3

**6.3.6** The auditor shall inspect the record of check-in calls and confirm that the requirements of clause **6.3.6** of PSA 28:2013 are met.

Non Compliance: Category 3

**6.3.7** The auditor shall confirm that facilities are in place for the checking and reviewing of reports and reporting procedures by the organisation's senior management. Such checks and reviews should take place on a quarterly basis.

Non Compliance: Category 3

**6.3.8** The auditor shall confirm that records are maintained in accordance with the provisions of clause **6.3.8** of PSA 28:2013.

Non Compliance: Category 3

# 6.4 Assignment Instructions

**6.4.1** The auditor shall inspect a sample of the organisation's assignment instructions and confirm that they comply with the requirements of clause **6.4.1** of

PSA 28:2013.

Non Compliance: Category 1

**6.4.2** The auditor shall confirm that the requirements of clause **6.4.2** of PSA 28:2013 for the endorsement of assignment instructions has been met.

Non Compliance: Category 2

**6.4.3** The auditor shall confirm that assignment instructions are available on site.

Non Compliance: Category 2

- **6.4.4** The auditor shall confirm that the assignment instructions include:
  - Contact procedures for contacting the command and control system.
  - Number of personnel involved and responsibilities.

Non Compliance: Category 3

**6.4.5** The auditor shall confirm that the assignment instructions contain the requirements set out in clause **6.4.5** of PSA 28:2013.

Non Compliance: Category 2

# 6.5 Security of Information and Access Media

**6.5.1** The auditor shall inspect the organisation's routines for staff dealing with confidential information and confirm that they meet the requirements of clause **6.5.1** of PSA 28:2013.

Non Compliance: Category 2

**6.5.2** The auditor shall inspect the back up records and confirm back up and storage is in accordance with clause **6.5.2** of PSA 28:2013.

Non Compliance: Category 2

**6.5.3** The auditor shall confirm that the organisation's procedures in respect of the holding and surrender of client keys is in accordance with clause **6.5.3** of PSA 28:2013.

Non Compliance: Category 3

### 6.6 Vehicles and Drivers

**6.6.1** The auditor shall inspect a sample of the organisation's vehicle(s) and confirm that they comply with the requirements of clause **6.6.1** of PSA 28:2013.

**6.6.2** The auditor shall confirm that vehicles carry a two-way communication capability, a dry powder fire extinguisher and a first aid kit.

Non Compliance: Category 2

**6.6.3** The auditor shall request details of all staff involved in the driving of vehicles and inspect the employees files to ensure that the requirements of clause **6.6.3** of PSA 28:2013 are met.

Non Compliance: Category 2

**6.6.4** The auditor shall inspect drivers history forms and confirm that they have been verified by the organisation.

Non Compliance: Category 3

**6.6.5** The auditor shall confirm that marked vehicles are readily distinguishable from those of the civil protection or emergency services.

Non Compliance: Category 3

### 6.7 General

**6.7.1** The auditor shall inspect the maintenance and service documentation of the organisation's vehicles and equipment and confirm that maintenance and service is in accordance with manufacturers recommendations.

Non Compliance: Category 3

**6.7.2** The auditor shall inspect the organisation's procedures for the issue and return of equipment.

# 7. COMPLIANCE WITH PSA LICENSING

# 7.1 Compliance with Standards

- **7.1.1** The auditor shall record any instances of non-compliance with PSA 28:2013 which come to their attention in the audit report.
- **7.1.2** The auditor shall confirm that a period not exceeding 12 months has passed since the last audit. If a period exceeding 12 months has passed the reasons for the extended period shall be recorded. Where the extended period was due to circumstances under the organisation's control it shall be recorded as a non-compliance.

Non Compliance: Category 1

**7.1.3** The auditor shall confirm that the organisation has provided the permissions required in clause **7.1.3** of PSA 28:2013.

Non Compliance: Category 1

# 7.2 PSA Licensing Requirements

- **7.2.1** Not applicable to certification audits.
- **7.2.2** The auditor shall confirm that the organisation complies with the requirements of clause **7.2.2** of PSA 28:2013.

Non Compliance: Category 2

- **7.2.3** The organisation shall provide the auditor with a statement signed by a principal of the organisation confirming either:
  - (a) that the requirements of clause **7.2.3** of PSA 28:2013 has not applied to them since their last audit.
  - (b) that they have complied with the requirements of clause **7.2.3** of PSA 28:2013 and notified the PSA in a change in their circumstances. Details of the change should be set out in the statement.

The statement should be attached to the audit report.

# 8. PART 2 – SECURITY GUARDING SERVICES

# 8.1 Security Guarding Provisions

**8.1.1** Part 2 of PSA 28:2013 sets out requirements to be complied with by organisations providing services in the Security Guarding sector in addition to the requirements contained in Part 1.

# 9. ORGANISATION

# 9.1 Compliance with Legislation

- **9.1.1** The organisation shall provide the auditor with a current statement, signed by a principal of the organisation, confirming compliance with all relevant legislation and shall state specifically its compliance, where relevant, with the following:
  - Control of Dogs Act(s).
  - Legally binding judgements, documents or agreements dealing with pay and conditions of staff.

The statement shall be dated within 2 weeks prior to the audit date and shall be attached to the audit report. The statement may form part of the statement provided at clause 3.7.1.

Non Compliance: Category 2

# 10. STAFFING

# 10.1 Terms of Employment

**10.1.1** The auditor shall confirm that terms of employment are in accordance with clause **10.1.1** of PSA 28:2013.

Non Compliance: Category 2

# 11. OPERATIONS

# 11.1 Command and Control System

**11.1.1** The auditor shall inspect the organisation's command and control facilities and confirm that they meet the requirements contained in clause **11.1.1** of PSA 28:2013.

Non Compliance: Category 1

**11.1.2** The auditor shall confirm that the organisation's command and control

system meet the requirements of clause **11.1.2** of PSA 28:2013 in relation to the storage of keys and the register of keys.

Non Compliance: Category 2

**11.1.3** The auditor shall inspect the organisation's facilities for the monitoring, recording and storage of static and mobile patrol assignments.

Non Compliance: Category 2

# 11.2 Operations Records

**11.2.1** The auditor shall inspect the mobile patrol check sheet and confirm compliance with clause **11.2.1** of PSA 28:2013.

Non Compliance: Category 2

**11.2.2** The auditor shall inspect the register of keys and confirm compliance with clause **11.2.2** of PSA 28:2013.

Non Compliance: Category 2

### 11.3 Assignment Instructions

**11.3.1** Where the provision of services includes patrols the auditor shall inspect a sample of the organisation's assignment instructions and confirm that they comply with the requirements of clause **11.3.1** of PSA 28:2013. This may be undertaken in conjunction with the inspection of the requirements of clause **6.4**.

Assignment instructions for patrols should include provision for check-in calls for before and after visiting an alarm activation.

Non Compliance: Category 1

# 11.4 Security of Information and Access Media

**11.4.1** The auditor shall inspect the organisations key storage facilities and confirm that they comply with the requirements of clause 11.4.1 of PSA 28:2013.

Non Compliance: Category 2

**11.4.2** The auditor shall inspect the organisations key register and confirm that it complies with the requirements contained in clauses **11.4.2**, **11.4.3** and **11.4.4** of PSA 28:2013.

## 12. PART 3 - DOOR SUPERVISION SERVICES

### 12.1 Door Supervision Provisions

**12.1.1** Part 3 of PSA 28:2013 sets out requirements to be complied with by organisations providing services in the Door Supervision sector in addition to the requirements contained in Part 1.

### 13. ORGANISATION

#### 13.1 Insurance

**13.1.1** The auditor shall inspect the organisation's insurance policy and certificate of insurance and verify that the cover is relevant to the nature of the business. The audit report shall confirm if deliberate act cover is provided and the maximum liability provided for.

Non Compliance: Category 1

### 13.2 Information to be given to Client

**13.2.1** The auditor shall inspect the organisations records and confirm that clients have been provided with the information required under clause **13.2.1** of PSA 28:2013.

Non Compliance: Category 2

**13.2.2** The auditor shall record in the audit report the method of communications used by employees when providing a security service.

Non Compliance: Category 2

#### 13.3 Risk Assessments

**13.3.1** Where the provision of services includes crowd control the auditor shall inspect a sample of the organisation's risk assessment surveys and confirm that they comply with the requirements of clause **13.3.1** of PSA 28:2013. This may be undertaken in conjunction with the inspection of the requirements of clause **6.1**.

Non Compliance: Category 1

# 14. OPERATIONS

### 14.1 Operations Records

**14.1.1** The auditor shall inspect the incident reports and confirm that they meet the requirements of clause **14.1.1** of PSA 28:2013.

Incident reports shall include the following details:

- (a) Date, time and place of the incident.
- (b) Date and time of reporting and by whom reported.
- (c) Nature of the incident.
- (d) Action taken, including onward reporting.
- (e) Involvement of Garda, Emergency Services or clients staff.
- (f) Further action to be taken.
- (g) Where possible names and addresses of all relevant persons present.

Non Compliance: Category 2

**14.1.2** The auditor shall inspect a sample of the organisation's registers for each site and confirm that they comply with the requirements of clause **14.1.2** of PSA 28:2013.

Auditors should request that registers are available for inspection at the audit location. Where volumes dictate, a sample of registers should be requested.

Non Compliance: Category 3

The PSA will accept a site specific book containing all required information for each location where a DSP service is provided.

# Annex A - Sample PSA 28:2013 Audit Report

Name of Certification Body						
Address						
Phone No				Email Address		
Name of Auditor(s)					Date of Audit	
Name of Contractor						
Address On PSA Licence						
Address Visited For Audit (if different from address above)						
Phone No				Email Address		
Contact Person					PSA Licence No. (if applicable)	
Sectors For Which Certification Is Required				Date of last audit		
Number of Non- Conformances Recorded	Cat 1	Cat 2	Cat 3	Date PSA notified	l audit completed	
Date Copy Of Audit Report requested by PSA				Date Copy Of Auc	dit Report sent to	

	Auditing Guidelines							
Requirements	Report							
2. General								
2.2 Audits								
2.2.2 Where the PSA								
has requested that an								
audit focus on certain								
areas of an								
organisations activities								
a brief report in addition								
to the specific PSA								
28:2013 requirements shall be provided. This								
report may include the								
auditor's observations,								
organisations response								
to audit, etc.								
15 0.5 0.5 0.5 0.5 0.5 0.5 0.5 0.5 0.5 0.								

	PART 1 COMMON PROVISIONS							
Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification			
3. ORGANISATION		•		•				
3.1 Ownership								
3.1.1 Names and								
contact details of each person to be recorded:								
person to be recorded.								
3.1.2 Names and								
contact details of all								
directors and company								
secretary to be recorded:								
Toolidea.								
0								
Screening Requirements Met:								
requirements wet.								
Declaration signed by								
accountant/solicitor								
where director/company								
secretary with company in excess of 5 years:								
iii excess oi o years.								

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.1.3 Details of any Director who is an operational employee:					
<b>3.1.4</b> Details of any bankrupt person:					
<b>3.1.5</b> Details of any beneficial interest in another organisation:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.1.6 Name and PSA licence number of all supervisory and management staff who undertake licensable activities:					
3.1.7 Names and contact details of any person who is a beneficiary or who has a material interest in the organisation:					
3.1.8 Copy of organisation chart provided where not previously supplied at Pre-Audit checklist:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.2 Finance					
3.2.1 TCC inspected:					
TCC No:					
Issue Date:					
Valid Until:					
3.2.2 Details of any					
director or shareholder					
loans:					
Date of Loan:					
Amount of Loan:					
Amount of Loan.					
Who the Loan is From:					
Amount of repayments					
made:					
Date of repayments:					
Bato or ropaymonto.					
Amount of Loan					
Outstanding:					
3.2.3 Cash Flow					
Statement inspected:					
Copy Provided:					
0.0.4.04					
3.2.4 Statement on					
bank signatories provided:					
provided.					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.3 Insurance					
3.3.1 Details of					
insurance:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.4 Premises					
3.4.1 All records, etc stored in secure confidential manner:					
3.4.2 Details of intruder alarm:					
3.4.3 Details of Alarm Monitoring :					
3.5 Organisation Information					
3.5.1 PSA Licence Number(s) contained on letterheads, contracts, etc.:					
Details of any unlicensed activity:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.5.2 Written contracts					
inspected and required details included therein:					
3.5.3 Contracts signed					
and delivered to client as required:					
3.5.4. Details of sub-					
contractor(s) including PSA licence number					
and expiry date:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
3.6 Quotations for Contracts					
<b>3.6.1</b> Written quotation comply with requirements:					
3.7 Compliance with Legislation:					
3.7.1 Statement on compliance with legislation provided:					
Meets all requirements of 3.7.1					
3.7.2 Statement on compliance with pay and conditions agreements/legislation:					
Verified compliance with 3.7.2					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4. STAFFING					
4.1 Selection & Pre- Employment Screening					
4.1.1 General					
<b>4.1.1.1</b> Pre employment records inspected:					
Required enquiries completed:					
4.1.1.2 Required screening undertaken:					
<b>4.1.1.3</b> Required personnel files exist:					
<b>4.1.1.4</b> Statements of Authorisation on files:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.1.5</b> Provisional Employment time frame meets requirements:					
4.1.1.6 Certified copies of personnel and screening documentation on file:					
4.1.1.7 Screening records for part-time employees and directors inspected:					
Screening completed:					
4.1.1.8 Screening records for temporary & ancillary staff inspected:					
Screening completed:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.1.9</b> Screening periods complied with:					
4.1.1.10 Age requirements complied with:					
Number of Staff aged over 65:					
Fitness for duty certificate(s) provided:					
<b>4.1.1.11</b> Monitoring & supervision procedures for provisional employees in place:					
4.1.1.12 Screening completed within 13 weeks of employment commencing:					

	1	

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.1.2.3 Interview notes recorded in line with PSA requirements and retained on personnel files:					
4.1.3 Character and other references					
4.1.3.1 Screening procedures complied with:					
<b>4.1.3.2</b> Procedures for references by phone followed:					
4.1.3.3 Requirements on third party documents met:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.1.3.4 Completed questionnaire on medical history/general health on file:					
4.1.4 Evidence of Qualifications					
<b>4.1.4.1</b> Evidence of qualifications/awards received:					
PSA Licence details provided prior to employment:					
4.1.5 Work Permits, Authorisations, etc					
<b>4.1.5.1</b> All permissions in place prior to employment commencing:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.1.5.2 Register of employees in place and in line with PSA requirements:		-			
<b>4.1.5.3</b> Current permissions are in place:					
4.1.6 Maintenance and Retention of Records					
4.1.6.1 All PSA required employee details held on file:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.6.2</b> Storage of Records secure:					
Records retained in accordance with Data Protection Commissioner:					
<b>4.1.6.3</b> List of personnel maintained:					
4.1.7 Screening and Acquired Companies					
4.1.7.1 Screening requirements for employees met:					
4.2 Terms of Employment					
<b>4.2.1</b> Contract of employment and staff handbook issued to staff:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.2.2</b> Terms of employment inspected and meet PSA requirements:					
4.3 Code of Conduct 4.3.1 Code of conduct meets PSA requirements:					
<b>4.3.2</b> Code of conduct signed by employees:					
4.4 Identification 4.4.1 Identity badge conforms to PSA requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.4.2 Instructions on requirements for wearing Identity Badge given to employees:				•	
4.4.3 Review of Identity Badges in line with PSA requirements:					
<b>4.4.4</b> Arrangements on withdrawal of identity badges in place:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.5 Uniform				•	
<b>4.5.1</b> Uniform complies with PSA requirements:					
4.5.2 Uniform distinguishable from civil protection services:					
<b>4.5.3</b> Organisations insignia clearly visible:					
<b>4.5.4</b> Procedures for renewal of uniforms:					
4.5.5 & 4.5.6  Not currently implemented.					
4.6 Threats & Violence					
<b>4.6.1</b> Risks of violence assessed:					
Mitigating measures implemented:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.6.2 Special training and safety routines in place where required:				•	
4.6.3 Safety routines updated and brought to employees attention:					
4.6.4 Additional supports provided to employees where risk of recurring violence identified:					
4.6.5 Evidence provided that 2 or more operatives complete task involving high risk of violence:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.6.6</b> Incidents involving violence recorded and investigated:					
Recommendations implemented:					
<b>4.6.7</b> Support procedures in place:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
5. TRAINING					
5.1 Training Policy & Responsibility					
5.1.1 Training Policy document inspected and PSA requirements met:					
<b>5.1.2</b> Details of Training					
Administrator:					
Qualifications:					
<b>5.1.3</b> Verified Training records inspected and in accordance with PSA requirements:					
<b>5.1.4</b> Policy to include Assessment of operational staff including additional training where required:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
5.2 Induction Training				•	
5.2.1 Details of					
Induction Training					
records inspected:					
-					
Marata DCA					
Meets PSA					
requirements:					
<b>5.2.2</b> Training provided					
prior to commencing					
operational duties:					
<b>5.2.3</b> Training provided					
by competent member of staff:					
or stair.					
5.3 Site Related					
Training					
<b>5.3.1</b> Facilities meeting					
PSA requirement exist :					
Tuefalis a usus 100 d ti					
Training provided by					
suitable person:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>5.3.2</b> Supernumerary requirement met:		.,		,	
<b>5.3.3</b> Site specific training plans in place:					
<b>5.3.4</b> Training provided in accordance with site specific training plans:					
<b>5.3.5</b> Training provided by competent member of staff:					
5.4 Basic Training					
<b>5.4.1</b> Operational staff qualified to provide the relevant service:					
5.5 Trainers & Training					
<b>5.5.1</b> Details of qualified trainer:					
Qualifications:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>5.5.2</b> Organisation has verified competency and qualifications of trainers:		•		•	
5.6 Specialist Training					
<b>5.6.1</b> Specialist training provided in line with PSA requirements:					
<b>5.6.2</b> Additional training provided as identified in Risk Assessment Survey:					
5.6.3 First Aid Training records inspected and training provided by QQI registered/qualified trainer confirmed:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
5.7 Refresher Training		•			
<b>5.7.1</b> Refresher training records inspected:					
Meet PSA requirements					
5.8 Supervisory &					
Management Training					
<b>5.8.1</b> Supervisory & Management training records inspected:					
Meet PSA requirements					
5.9 Training Records					
<b>5.9.1</b> Training records inspected & maintained:					
5.9.2 Training records					
meet PSA requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>5.9.3</b> Training records available to employees:					
<b>5.9.4</b> Verification of training available for inspection:					
<b>5.9.5</b> Refresher training recorded:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
6. OPERATIONS		•		•	
6.1 Risk Assessments					
<b>6.1.1 and 6.1.2</b> Risk					
Assessment survey					
documentation					
inspected:					
Surveys undertaken for					
each site:					
Meet PSA					
requirements:					
6.2 Command and					
Control System					
<b>6.2.1</b> Command &					
Control facilities meet					
PSA requirements:					
·					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.2.2</b> Confirm status of command and control system (dedicated, contracted or shared)		·			
Clients advised of system(s):					
Site/Mobile system used:					
Looped check-in-call systems used:					
Meet PSA requirements:					
6.2.3 Minimum provisions for command and control systems met:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.2.4</b> Dedicated fixed location visited:					
Meets PSA requirements:					
<b>6.2.5</b> Report on contracted facilities inspected:					
Meets PSA requirements:					
Facility Details:					
<b>6.2.6</b> Documents on shared third party facility inspected :					
Meets PSA requirements					
Facility Details:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.2.7</b> Organisations client list inspected:				•	
Meet PSA requirements					
<b>6.2.8</b> Client listing held in secure housing :					
6.3 Operations Records					
<b>6.3.1</b> Operation records inspected:					
Employees advised, in writing, of reporting structure for urgent/non urgent issues:					
,					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.3.2</b> Incident reports recorded in accordance with PSA requirements:					
6.3.3 Records kept at command and control centre:					
<b>6.3.4</b> Entries recorded in accordance with PSA requirements:					
6.3.5 Organisation's escalation policy document in place:					
6.3.6 Check in call records kept as required:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.3.7</b> Procedures for checking and reviewing of incident reports in place:		noquiiou		острыхо	
6.3.8 Records maintained in accordance with PSA requirements:					
6.4 Assignment Instructions					
<b>6.4.1</b> Assignment Instructions inspected:					
Meet PSA requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.4.2</b> Requirements for endorsement met:		·		·	
<b>6.4.3</b> Assignment instructions available on site:					
<b>6.4.4</b> Assignment instructions include required details:					
<b>6.4.5</b> Assignment instructions include required details:					
6.5 Security of Information and Access Media					
6.5.1 Routines established to deal securely with information					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
6.5.2 Back-up & Storage procedures in place:		,		•	
Meet PSA Requirements:					
<b>6.5.3</b> Procedures for the surrender of key meet PSA Requirements:					
6.6 Vehicle & Drivers					
<b>6.6.1</b> Vehicles liveried in accordance with PSA Requirements:					
<b>6.6.2</b> Vehicles contain two way communication capability:					
Fire extinguisher:					
First aid kit:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.6.3</b> Driving licences valid:					
Copies held on employees files:					
<b>6.6.4</b> Driver History forms maintained and verified in line with PSA requirements:					
<b>6.6.5</b> Vehicle distinguishable from civil protection and emergency vehicles:					
6.7 General					
<b>6.7.1</b> Vehicles and equipment serviced and maintained:					
Records inspected:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6.7.2</b> Equipment signed for:					
Undertaken to return equipment:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
7. COMPLIANCE WITH		- 1			
PSA LICENSING					
7.1 Compliance with					
Standards					
7.1.1 Has organisation					
maintained compliance					
with standard:					
Instances of non-					
compliance not					
recorded elsewhere in					
audit report:					
Any other matter to be					
brought to the attention					
of the PSA:					
<b>7.1.2</b> Duration since last					
audit:					
If greater than 12					
months reasons for					
same:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
7.1.3 Has organisation provided all required permissions:				•	
7.2 PSA Licensing					
Requirements					
7.2.1 Not applicable					
<b>7.2.2</b> Compliant with all relevant legislation :					
<b>7.2.3</b> Statement on notifying the PSA of certain matters provided:					
Copy attached to audit report:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
8. Not Applicable				•	
9. ORGANISATION					
9.1 Compliance with Legislation					
9.1.1 Statement on compliance with legislation provided:					
10. STAFFING					
10.1.1 Terms of employment inspected and meet PSA requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
11 OPERATIONS		•		•	
11.1 Command and					
Control Systems					
11.1.1 Command & Control facilities meet PSA requirements:					
11.1.2 Secure lockable cabinet provided:					
Key register maintained:					
11.1.3 Monitoring and recording of assignments meet PSA Requirements:					
Records available for inspection by client:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
11.2 Operations Records					
11.2.1 Mobile Patrol check sheets meets PSA Requirements:					
11.2.2 Register of keys and key movements maintained and meets PSA Requirements:					
11.3 Assignment Instructions					
11.3.1 Assignment Instructions meet PSA Requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
11.4 Security Of Information and Access Media					
11.4.1 Keys coded in accordance with PSA Requirements:					
Keys secured in line with PSA requirements:					
11.4.2 Measures controlling key movements in place:					
Records for Key movement meet PSA Requirements:					
11.4.3 Key register inspected and signed by manager:					
<b>11.4.4</b> Key register maintained in line with PSA Requirements:					

PART 3 - DOOR SUPERVISION SERVICES								
Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification			
12 Not applicable		•						
13. ORGANISATION								
13.1 Insurance								
<b>13.1.</b> Details of insurance:								
13.2 Information to be given to Client								
<b>13.2.1</b> Clients provided with required information:								
<b>13.2.2</b> Communications methods used by employees:								

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
13.3 Risk		•		•	
Assessments					
13.3.1 Risk Assessment					
on crowd control meets					
PSA requirements:					
44 OPERATIONS					
14. OPERATIONS					
14.1 Operations Records					
14.1.1 Assignment					
instructions structured					
so that incident reports					
and other matters					
recorded:					
B de delete dele					
Records maintained in					
line with PSA					
requirements:					
14.1.2 Register of Door					
Supervisors meet PSA					
requirements:					
'					

# Annex B – Ongoing Screening & Training records

Company:				
Address:				
PSA Licence	No	Certification Body		
Screening Re	ecords previously	/ checked		
Name	PPSN	Licence Number	Position in Organisation	Compliant Y/N
Training Doc	orde proviously (	shocked.		
Name	ords previously o	Licence Number	Position in Organisation	Compliant Y/N
Auditor:			Date:	
Auditor Sign	ature:			

# **Annex C** – Declaration by Director

Company:				
Address:				
PSA Licence No		ion Body		
I	act for			
(Insert Name) In the capacity of	(Accountant/Solid	(Organisatio	n)	
I wish to confirm tha a period of 5 years o		ectors/Secretary h	nas been with the organis	ation for
Name	Address	PPSN	Date of Birth	
Accountant/Solicitor	· Signature:			
Accountant/Solicitor (Block Capitals)	· Name:			
Date:				

### Annex D - Declaration of Compliance with Legislation

To be completed not more than 2 weeks prior to annual PSA 28:2013 Audit

Company:				
Address:				
Registration No.:	PSA License	e No.:		
I/We confirm our intention to be limited to the legislation indicar	<u>-</u>	all legislation including b	ut not	
Health, Safety and Welfare at V	Vork Act(s)	Compliant		
Organisation of Working Time	Act(s)	Compliant		
Private Security Services Acts		Compliant		
Data Protection Acts		Compliant		
Taxation and Social Welfare Ac	ts	Compliant		
Payment of Wages Act		Compliant		
I/We confirm that we are in fu agreements and/or legislation conditions				
Authorised Signatory		Date:		

Annex E - Checklist for Personnel Files The following items have been inspected in relation to staffing and meet the requirements of PSA 28: (please tick) 1. Pre-employment records (Clause 4.1.2.1) 2. Personnel file exists for all relevant staff including part time employees and directors (Clauses 4.1.1.3, 4.1.1.7 & 4.1.1.8) 3. Screening has been completed (Clause 4.1.1.2) 4. Statement of Authorisation exists (Clause 4.1.1.4) 5. Provisional employment has not exceeded 9 months (Clause 4.1.1.5) 6. Certified copies of screening document on file (Clause 4.1.1.6) 7. Screening periods compliant with Standard (Clause 4.1.1.9) Confirm age of personnel and where applicable fitness for duty certificate

ο.	(Clause 1.1.1.10)	
9.	Screening completed within time frame (Clause 4.1.1.12)	
10.	Screening for a shorter period, where applicable, is compliant with Standard (Clause 4.1.1.13)	
11.	Permissions/work permits/authorisations, where applicable, on file (Clause 4.1.1.14)	
12.	Gaps on screening record addressed (Clause 4.1.1.15)	
13.	Interview notes on file (Clause 4.1.2.3)	
14.	References, where applicable, are on file (Clause 4.1.1.15, 4.1.3.1 & 4.1.3.2)	
15.	Third party documents on file (Clause 4.1.3.3)	
16.	Questionnaire on medical history on file (Clause 4.1.3.4)	
17.	Evidence of qualification or copy of licence on file (Clause 4.1.4.1)	
18.	Records maintained (Clause 4.1.6.1)	
19.	Screening and Acquired Companies (Clause 4.1.7.1)	
20.	Terms of Employment (Clause 4.2.1)	
21.	Code of conduct signed and on file (Clause 4.3.2)	
22.	Training records held with Personnel File (Clause 5.1.3 Note)	
Auc	litor Signature: Date:	

# <u>Annex F</u> – Information Note on PSA 28:2013 (Clause 4.1.6.2) and Data Protection

Clause 4.1.6.2 of PSA 28:2013 requires employers to keep employee records safe from unauthorised access or accidental loss. All employers are data controllers within the meaning of the Data Protection Acts and have an obligation to ensure the security of their employees personal data.

Section 2(1)d of the Data Protection Act states:

"appropriate security measures shall be taken against unauthorised access to, or unauthorised alteration, disclosure or destruction of, the data, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing"

In determining what security measures should be put in place in order to satisfy the requirements of section 2(1)(d) a number of factors may be taken into consideration;

- The state of technological development Measures must be reviewed over time.
- The cost of implementing the measures. Larger organisations with greater resources can be expected to implement more advanced measures, or update measures more regularly, than smaller bodies.
- The harm that might result from unlawful processing. Might someone be at a financial loss or be at risk of suffering injury as a result of disclosure or destruction of data?
- The nature of the data concerned. There is a greater duty of care relating to the processing of sensitive personal data.

The Data Protection Commissioner recommends that data controllers implement the following measures:

- access to data is restricted to authorised staff only,
- staff are aware of the security measures in place for the protection of data,
- procedures are in place to ensure that staff comply with the security measures,
- printouts are disposed of properly,
- that all third part access to data should be covered by written contract stipulating the conditions applying to the use, retention and destruction of data.

Under section 4 of the Data Protection Acts, a (former) employee can make an access request for their personal data and furthermore under section 6 can seek a rectification of the documentation held, if there are any inaccuracies in the information.

Further information is available form the website of the Data Protection Commissioner, www.dataprotection.ie.

# $\underline{\text{Annex G}}$ - Form 5b - Private and confidential Department of Social Protection claim history

I hereby request from the Department of Social Protection details of my Social Welfare Claim record, i.e. type and duration. This information is required by me to comply with screening requirements set out in PSA 28:2013 and PSA 33:2014 as prescribed by Regulations (S.I. 190 of 2014), PSA 39:2014 as prescribed by Regulations (S.I. 302 of 2014) and Irish Standards IS 998:2006 as prescribed by Regulations (S.I. 857 of 2007) and SR 40:2005 as prescribed by Regulations (S.I. 144 of 2012) These standards and regulations are specified by the Private Security Authority.

<b>-</b> -7-7	of 2012) These standards and re	Salations are specified by the r	Trace Security Auti	J. 10y.
Sign	ed:	Date:		
Nan	ne (BLOCK LETTERS):			
Full	Name:			
	ress at time of benefit:			
Clai	m history (last 5 years)			
	Туре	e Of Claim	Date From	Date To
1				
2				
3				
Sig	nature:	Date: _		<del></del>
		_		
			Department of Soci Protection Stamp	al
			·	

#### Pre - Audit Checklist Template

Compa	any:	=	
Addre	ss:	-	
PSA Lic	cence No Certification Body	_	
	of		
	m that there have been no changes to the following clauses of PSA 28: v affect since	2013 in so far	
	y affect since (Organisation)	(Date)	
	ORGANISATION/FINANCE	(Please √)	
1.	Clause 3.1.1 – Ownership and Management of Organisation		
2.	Clause 3.1.2 – Details of Directors		
3.	Clause 3.1.4 – Details of any bankruptcy of directors or principals		
4.	Clause 3.1.5 – Beneficial interest in other organisations		
5.	Clause 3.1.7 – Beneficiary of the organisation		
6.	Clause 3.1.8 – Organisation Chart attached		
7.	Clause 3.2.3 – Current Tax Clearance Certificate attached		
	Signature Date		
	Position in Organisation		