



PUBLIC CONSULTATION – PSA LICENSING REQUIREMENTS – SUPPLIER OR INSTALLER OF SAFES

Summary of Public Consultation	
Agency: The Private Security Authority	Legislation: The Private Security Services Acts 2004 - 2021
Subject: PSA Licensing Requirements for Contractors in the Supplier or Installer of Safes sector	Date: 21 st April 2023
Open To: Security Industry and Interested Parties	
Related Publications: None	
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Agency and Legislation

The Private Security Services Act 2004, as amended, established the Private Security Authority (PSA) as the statutory body with responsibility for the licensing and regulation of the security industry in Ireland.

The functions of the PSA as set out in section 8 of the 2004 Act includes, the specification of standards for the granting of contractor licences.

Why is this Public Consultation being issued?

As part of the licensing process the PSA prescribes the standards and requirements which contractors must meet and adhere to. The PSA is considering the contents of the public consultation document “PSA Licensing Requirements – Supplier or Installer of Safes” as the basis of the standard to apply to Supplier or Installer of Safes contractors.

The public consultation is open to the security industry and any other parties who have an interest in the regulation of Supplier or Installer of Safes.

Responding to this Public Consultation

This Public Consultation is being issued for the information of the security industry. Comments on same should be made to the PSA by the 22nd May 2023

By email at: public_consultation@psa.gov.ie

Or

By Post to: The Private Security Authority
Davis Street
Tipperary Town
Co. Tipperary
E34 PY91

The closing date for receipt of comments is 22nd May 2023



An tÚdarás Slándála Príobháidí
The Private Security Authority

The Security Regulator

PUBLIC CONSULTATION
PSA LICENSING REQUIREMENTS
Supplier or Installer of Safes
(PSA 94:2023)

Standard For The Licensing Of
Supplier or Installer of Safes

www.psa-gov.ie

April 2023

Contents

1.	SCOPE	5
2.	DEFINITIONS	6
3.	PLANNING AND DESIGN	9
4.	SUPPLY	9
5.	INSTALLATION	10
6.	LOCKS	11
7.	MAINTENANCE	11
8.	AS FITTED DOCUMENT	12
9.	OPENINGS	13
10.	ORGANISATION	14
11.	LEGISLATION	14
12.	COMPLIANCE WITH PSA LICENSING	15
	ANNEX A – RECORDING OF OPENING	17
	ANNEX B – CONFORMITY DECLARATION FOR THE ANCHORAGE OF SAFES	18

1. SCOPE

This standard provides a specification for compliance with licensing by the Private Security Authority and applies to contractors seeking licences to provide security services as a Supplier or Installer of Safes. Organisations seeking a Supplier or Installer of Safes licence will also be required to comply with PSA 74:2019 – Licensing Requirements for Security Service Providers*. For the purposes of this standard, safes includes ATM safes, deposit safes, strong rooms and vaults.

The Government of Ireland through the Private Security Services Act, 2004 as amended, established the Private Security Authority (PSA) as the national regulatory and licensing body for the private security industry. Amongst the functions of the PSA are:

- The controlling and supervising of persons providing security services and maintaining and improving standards in the provision of those services.
- Specifying standards to be observed in the provision of security services.
- Specifying qualifications or requirements for the granting of licences.

Contractors licensed by the PSA and those seeking a licence from the PSA must comply with this standard. Certification for licensing purposes will be undertaken by auditors appointed by the PSA. Contractors will be required to pay for the cost of certification audits. Contractors will be notified of the cost of audits in advance.

By applying for and holding a licence, contractors agree to the sharing of information relating to this document, the contents herein and any audit (including audit reports) undertaken for the purposes of PSA licensing between the PSA and the auditor. Where a contractor fails to comply with the requirements of this standard, the auditor is obliged to notify the PSA.

This document is for the purpose of licensing by the PSA and should not be interpreted as meeting any other statutory obligations of an organisation. It is not a technical reference.

Only the most recent edition of the Requirements Document specified by the PSA shall apply for licensing purposes. To ascertain the edition applicable visit the PSA website, www.psa.gov.ie.

* Holders of a current Locksmith Licence will not be required to meet PSA 74:2019

2. DEFINITIONS

- 2.1 Ancillary Staff.** All security organisation staff not directly employed in duties falling within the definition of occupations covered by this standard who may have access to information of a confidential nature.
- 2.2 Assessment.** Test carried out to certify the competence of all officers.
- 2.3 ATM Safe.** A storage unit which forms part of an ATM system which protects its contents from burglary or attack.
- 2.4 Auditor.** A person or body appointed by the PSA to provide audit and certification services in respect of the supplier or installer of safes sector.
- 2.5 Authorised Officials.** Personnel of bodies authorised by statute to enter the premises of the service provider and request documentation and information pertaining to their official functions.
- 2.6 Basic Training.** Qualification required by all employees to meet the mandatory training requirements in respect of PSA licensing.
- 2.7 Client.** Individual or organisation retaining and maintaining a security service covered by this standard to carry out agreed services in accordance with an agreed contract or other form of oral or written agreement to provide such services.
- 2.8 Compliance Manager.** A senior person within the organisation responsible for ensuring compliance with all PSA licensing regulations and requirements for the provision of security services.
- The Compliance Manager will be considered as a manager of the organisation for the purposes of section 22(3)(b)(i) of the Private Security Services Act.
- 2.9 Contract.** Document, agreed and signed by both the service provider and the client, setting out the proposed services to be supplied and the details of the quotation, terms, conditions, responsibilities and undertakings.
- 2.10 Induction (Training).** The organisation-specific induction briefing session covering organisation structure, ethos, policies and including the organisation's and employee's roles and responsibilities.
- 2.11 Licence Card.** The official identification card issued by the PSA to each individual employee licence holder to verify his or her licence status. The card to be held on the person of the individual employee whilst providing a supplier or installer of safes service.

- 2.12 Organisation.** A Body Corporate, a partnership or sole trader providing supplier or installer of safes services, for which a relevant and applicable PSA licence is required.
- 2.13 Primary Service.** The service, which the organisation and the client have agreed will be provided, all or part of which will comprise a security service covered by this standard.
- 2.14 Principal (of the organisation).** Managing Director, Partner, Majority Owner, authorised member of the Board, Chief Financial Officer, Chief Executive Officer or any person authorised, in writing, by any of these persons to enter into contracts or agreements on behalf of the service provider covered by the provisions and requirements of this standard. A sole trader, for the purposes of this requirements document should be regarded as the principal.
- 2.15 Private Security Authority (PSA).** The regulatory and licensing authority for the private security industry in the Republic of Ireland.
- 2.16 Relevant Employment.** Employment which involves the provision of a licensable security service or employment which involves, or may involve, the use, acquisition of, or access to, knowledge of a confidential nature, the improper use of which could involve the organisation, its clients, or any third party, in a security risk.
- 2.17 Safe.** A storage unit other than a strong room, which protects its contents from burglary or attack.
- Note: For the purpose of this standard, a safe includes safes with deposit systems.
- 2.18 Safe Certification.** A safe which has been certified according to the European standards specified in this document by a certification body accredited to ISO/IEC 17065.
- 2.19 Safe Key.** A device the purpose of which is to operate a safe or strong room lock.
- 2.20 Screening.** The selection process and criteria used to check the history and background of potential employees to assist the organisation in its recruitment of new staff covered by this standard.
- 2.21 Screening Period.** Period of not less than five years prior to the date of the application for relevant employment or transfer to relevant employment.
- 2.22 Security Service.** The provision of a service by a private contractor in the course of their business where all or part of which will comprise a security service.
- 2.23 Site:** The premises, property, area or complex at which the security service is carried out.

2.24 Specialist Tools. Tools unique to the provision of services by installers of safes.

2.25 Strong Room. A storage unit which protects its contents from burglary or attack and when closed has internal side lengths greater than 1 metre in each direction.

Note: For the purpose of this standard a strong room includes strong room doors and vaults.

Note: Where the word "safe" is used in a clause it should be taken to also include a strong room unless specifically excluded.

2.26 Supplier or Installer of Safes. A supplier or installer of safes means a person, who provides a security service;

a) supplying, installing, opening, maintaining, repairing or servicing safes which are certified to;

(i) the European Standards EN1143-1 or EN1143-2 at Resistance Grade 0 or above,

(ii) which have a cash rating greater than €3,750, or

b) supplying, installing, opening, maintaining, repairing or servicing ATM safes, or

c) supplying, installing, opening, maintaining, repairing or servicing strong rooms.

2.27 Training Administrator. A person within the organisation appointed to supervise and record all aspects of training within the organisation.

2.28 Verification. Confirmation by sight of written and/or electronic records held at the organisation's premises.

3. PLANNING AND DESIGN

3.1 The organisation shall undertake an analysis of the client's requirements before providing advice on the type of safe or strong room required. The analysis shall include:

- (a) the purpose of the safe or strong room,
- (b) the location where the safe or strong room will be situated,
- (c) the load bearing capacity of the floor where the safe or strong room will be situated,
- (d) the contents and their value,
- (e) potential threats,
- (f) the premises and surroundings,
- (g) the existing security measures at the premises,
- (h) the clients specifications,
- (i) insurance requirements and certified insurance cover,
- (j) resistance level of the safe or strong room,
- (k) certification details of the safe or strong room,
- (l) operational procedures,
- (m) power supply and back-up systems,
- (n) maintenance and servicing.

The objective of the analysis is to determine the appropriate equipment for the clients' needs.

3.2 A copy of the analysis shall be provided to the client and shall form a part of any agreed contracted service.

3.3 The analysis may be subject to alteration during the supply and installation stage. Any such alterations shall be agreed between the licensed contractor and the client. In these cases, the analysis shall be amended accordingly.

4. SUPPLY

4.1 All safes and strong rooms shall be certified to comply with EN 1143-1 or EN 1143-2 (as applicable) and any other relevant National and European standards required by the PSA.

4.2 Where a safe or strong room has not been certified to EN 1143-1 or EN1143-2 the organisation shall supply the client with evidence as to the certification/insurance rating of the safe/strong room. Such evidence shall include paperwork from the manufacturer confirming the certification/insurance rating and paperwork from the relevant certification body and/or insurance surveyor.

- 4.3 Certification provided to clients in accordance with clauses 4.1 and 4.2 shall be issued by a certification body accredited to EN 17065 for the purpose of safe/strong room certification.
- 4.4 The organisation shall inform the client in writing if they are being provided with a pre-used safe. All documentation relating to the sale, supply and installation of the safe shall indicate that it is a pre-used safe.
- 4.5 The organisation shall inform the client in writing of any alterations, changes or fixings which have been made to a safe or strong room.

Note: Where a safe or strong room has been altered, changed or fixed in any way the organisation shall supply the client with evidence of the impact of such change on the certification/insurance rating.

- 4.6 The organisation shall confirm that the safe they supply does not contain asbestos. Such confirmation shall be accompanied by certification from the manufacturer or supplier that asbestos is not present in the safe.

5. INSTALLATION

- 5.1 Safes and strong rooms installed in financial institutions and ATM safes shall comply with current An Garda Síochána guidelines including any advices, guidelines or other notices issued by the Garda Technical Advisory Group (GTAG).
- 5.2 All components shall be installed in accordance with the manufacturer's recommendations. If installation of a component in accordance with the manufacturer's recommendations is not possible, advice should be sought from the manufacturer.
- 5.3 The installation shall be carried out by installers with the necessary training and experience. Installers shall have the appropriate tools and equipment necessary to undertake the installation correctly.
- 5.4 Any electrical installation or connection required shall comply with current national and site regulations and the electrical work shall be carried out in accordance with the National Rules for Electrical Installations (I.S. 10101). Electrical work shall be carried out by technicians who are qualified to undertake such work.
- 5.5 On completion, the installation shall be tested and checked against the agreed contracted service. The client shall be provided with a record of the testing and written confirmation that the safe and its installation meet the planning and design analysis undertaken in accordance with **Clause 3.1**.

5.6 The client shall be provided with operating and maintenance instructions for the safe/strong room.

6. LOCKS

6.1 Where the installation includes the provision of locks, all locks shall be installed in accordance with the manufacturer's instructions.

6.2 The lock assembly of any previously installed lock shall be recorded in addition to the lock assembly of the lock to be installed.

6.3 The installation of locks shall not lessen or weaken the level of protection provided by the safe or strong room. The following aspects are to be taken in to account as part of any installation:

- (a) the lock being installed is certified for use in the safe/strong room,
- (b) all drill points are sealed adequately,
- (c) glass plates, emergency locks, etc, are in correct position and fully functional in accordance with manufacturers guidelines.

6.4 Where a time lock is installed the client shall receive training on the operations of the lock. When trained the client should be competent to programme and manage all required functions of the lock including any reports generated by the lock.

6.5 Where an electronic lock is installed the client shall receive training on the operations of the lock. When trained the client should be competent to programme and manage all functions of the lock including any reports generated by the lock.

6.6 The client shall be provided with operating and maintenance instructions for each lock installed.

7. MAINTENANCE

7.1 It is the client's responsibility to arrange for the installation to be properly maintained (inspected and serviced) and repaired as scheduled or necessary.

A documented arrangement should be made between the client and the organisation for the repair and maintenance of the installation. The arrangement shall specify the schedule of maintenance agreed including:

- (a) the frequency of maintenance required,
- (b) the requirements of such maintenance.

7.2 The client shall be informed in advance of the date on which the maintenance shall be carried out and the identity of the person who shall carry out the maintenance.

When conducting safe or strong room maintenance, repairs or servicing in a public area, suitable privacy screens/covers are to be erected to prevent exposure to public viewing.

- 7.3 A documented record of all maintenance and repairs shall be signed by the maintenance technician and the client.
- 7.4 Any necessary repairs or alterations to safe doors or strong rooms following maintenance are to be performed in such a way as to return the item to the same level of protection or better, as provided before the opening/servicing. Alterations shall be in accordance with the manufacturer's technical document. Where this is not possible, the client is to be advised and direction sought.
- 7.5 All procedures used in the maintenance, repair and servicing of safes or strong rooms shall be in accordance with the manufacturer's policy and instruction and meet manufacturer's specifications.
- 7.6 Safes should only be removed from a client's premises for maintenance, repairs or service where such maintenance, repairs or service cannot be undertaken at the clients premises.
- 7.7 The organisation shall carry out a health and safety assessment for the presence of asbestos before undertaking any maintenance, repair or service of a safe.

8. AS FITTED DOCUMENT

- 8.1 Upon completion of the installation of a safe/strong room, an as-fitted document shall be produced including the following information:
 - (a) the name, address and telephone number of the client,
 - (b) the address where the safe was installed, if different from (a),
 - (c) the name, address and telephone number of the supplier,
 - (d) the name, address and telephone number of the installer, if different from (c),
 - (e) the manufacturer, product name and serial number of the safe/strong room,
 - (f) where the product provided was produced prior to the 1st January 2001, a certificate confirming the absence of asbestos in the product's manufacture,
 - (g) the official cash or contents insurance rating in Euros (if any) for equipment supplied and the source of the rating being referred to,
 - (h) a copy of the analysis required under **Part 3** of this Requirements Document,
 - (i) all certification and other paperwork required under **Part 4** of this Requirements Document,
 - (j) the type and location of any power supplies,
 - (k) power supply standby periods where relevant,
 - (l) record of all testing,
 - (m) relevant documentation relating to equipment,
 - (n) relevant documentation relating to software functions,

- (o) the number of keys and/or codes for the safe/strong room provided to the client,
- (p) record of all changes made to the locks and/or locking system,
- (q) details of maintenance schedule/requirements.

8.2 The as-fitted document shall be agreed with the client and a copy provided to the client.

8.3 The client shall be advised to keep all documentation for the safe/strong room in a place where access is restricted to authorised people.

9. OPENINGS

9.1 Where an organisation is called out to open a safe or strong room they shall satisfy themselves as to the identity of the client and their entitlement to request an opening before undertaking any work. A driving licence, passport or other photo ID should be requested together with documentary proof that they are entitled to have the safe or strong room opened (permission to request service on company letterhead or similar).

9.2 Where an organisation is not satisfied as to the identity of the client or their entitlement to request an opening, the organisation should request that An Garda Síochána be notified that an opening has been requested. Evidence that the request to An Garda Síochána has taken place should be provided to the organisation. If the client refuses to notify An Garda Síochána, no opening should take place and the organisation should notify An Garda Síochána of the incident.

9.3 Where an opening takes place the Record of Opening Form at Annex A shall be completed and signed by the client and organisation.

9.4 When conducting safe or strong room openings in a public area, suitable privacy screen/cover is to be erected to prevent exposure to public viewing.

9.5 Any repairs or alterations to safe doors or strong rooms necessary following an opening are to be performed in such a way as to return the item to the same level of protection or better, as provided before the opening. Where this is not possible, the client is to be advised and direction sought.

9.6 Whenever possible, openings are to be confined, in the first instances to unlocking of the mechanism. The actual opening should be carried out by the client and the contents removed by the client before any further work is carried out. Alternatively, the organisation may open the door but only in the presence, and with the consent, of the client. The organisation, anyone in its employ or any person acting on its instruction shall not handle, disturb or remove any of the contents inside.

- 9.7** Safes should never be removed from a client's premises for opening except in circumstances where it is unsafe to work on the clients premises.

Note: Circumstance where it is unsafe to work on the clients premises include following fires, building renovations, etc.

10. ORGANISATION

- 10.1** All insurances shall be relevant to the nature of the business undertaken. Where the services provided dictate, cover for the following may be required:
- Specialist Safe Delivery And Installation Insurance
 - Product Liability
 - Professional indemnity
 - Deliberate act
 - Loss of keys and consequential loss of keys
- 10.2** The organisation shall ensure that all employees have read and are sufficiently knowledgeable in relation to current European Standards for "secure storage units" to carry out their specific duties in compliance with the relevant European Standards.
- 10.3** The organisation shall ensure that all employees have read and are sufficiently knowledgeable in relation to HSA guidelines regarding asbestos risks that may be encountered in safes and strong rooms.
- 10.4** The organisation shall ensure that all employees are trained according to the requirements set out in Section 5 of the PSA Standards "PSA Licensing Requirements for Security Service Providers - PSA 74:2019" (or "PSA Licensing Requirements for Locksmiths - PSA 55:2022" where applicable)
- 10.5** All directors, management, supervisory and operational staff must hold a current PSA employee licence where they are carrying out an activity that is subject to PSA licensing. If the legal status of your organisation is that of a Sole Trader then the Sole Trader will not be required to hold a PSA Employee Licence

11. LEGISLATION

- 11.1** All installations, repairs, servicing and maintenance shall be conducted in accordance with building, electrical and fire regulations.
- 11.2** Suppliers and Installers of Safes shall be familiar with all legislation relevant to the provision of their business.

12. COMPLIANCE WITH PSA LICENSING

- 12.1** The organisation shall appoint a suitability qualified person as Compliance Manager who shall be responsible for the management of all security services provided by the organisation. The person appointed should hold a managerial position within the organisation.
- 12.2** The organisation shall ensure that an inspector appointed by the PSA may at any time enter any place where a security service is being provided and provide any information requested by an inspector in the course of any inspection or investigation.
- 12.3** Organisations shall maintain compliance with this standard and all other relevant PSA Requirements Documents during the term of their licence. Failure to maintain compliance may result in the PSA taking action against the licensee up to and including the revocation of the licence.
- 12.4** Organisations shall be subject to an audit by a PSA appointed auditor at least once during each calendar year or at such intervals as the PSA may prescribe. The purpose of the audit is to verify compliance with the specified standards.
- 12.5** An audit report shall be completed by the auditor for each audit undertaken and the organisation shall agree to the auditor providing a copy of the report to the PSA.
- 12.6** Organisations shall give their permission to the auditor to provide the PSA with information in accordance with provisions **12.7** and **12.8**.
- 12.7** Where an organisation fails to undertake or complete an audit the auditor shall notify the PSA of the failure and the reason for same.
- 12.8** Where an organisation is found to be non-compliant with a standard the auditor shall notify the PSA of the reason for the non-compliance and any resulting action taken against the organisation.
- 12.9** Organisations shall be familiar with all legislation relevant to the provision of their business.

12.10 During the term of the licence, organisations shall comply with all relevant and current legislation and specifically the following:

- a) The Private Security Services Acts and Regulations.
- b) Safety, Health and Welfare at Work Regulations including the Safety, Health and Welfare at Work (Exposure to Asbestos) Regulations.
- c) Organisation of Working Time Acts.
- d) Taxation and Social Welfare Acts.
- e) Payment of Wages Acts.
- f) Immigration Acts.
- g) General Data Protection Regulation.
- h) Sale of Goods and Supply of Services Legislation.
- i) Prohibition On The Marketing Of Products Containing Asbestos Regulation – REACH (EC) No. 552/2009
- j) European Product Legislation.
- k) Building Regulations.
- l) Companies Act 2014 (where appropriate).

12.11 The organisation shall within 7 days notify the PSA in writing if any of the following occur:

- a) Change of name of the licence holder.
- b) In the case of a body corporate, change in company directors.
- c) In the case of a partnership, change in partners.
- d) Change of ownership of the organisation. In the case of a body corporate this includes a change in any shareholding above 5%.
- e) Change of address from which the security service is being provided.
- f) Change of registered address if this is different from address at e) above.
- g) Change in the legal status of the licence holder.
- h) Any conviction against the licence holder whether in relation to the business of the licence holder or other matter. In the case of a body corporate this includes any convictions against a director. In the case of a partnership this includes any conviction against a partner.

ANNEX A – RECORDING OF OPENING

Name of Client: _____

Address of Client: _____

Clients Phone No.: _____

Name of Person Requesting: _____

(if different from client)

Details of Request: _____

Time and Date of Request: _____

ID Verified: YES/NO Type of ID: _____

Entitled to make Request: YES/NO. Means of Verifying Entitlement: _____

Time and Date of Opening: _____

Details of Opening: _____

The client/requesting party declares to have all the legal rights, powers and faculties to request the callout service and takes full legal responsibility for any consequences deriving from the callout. The client/requesting party also takes full responsibility of the contractual obligations with the organisation carrying out the callout service and agrees to fully cover the callout charges where the service cannot be undertaken due to unforeseen circumstances.

Clients/Requesting Party's Signature: _____ Date: _____

Organisations Representative Signature: _____ Date: _____

ANNEX B - CONFORMITY DECLARATION FOR THE ANCHORAGE OF SAFES

Safes with a weight below **1000kg** shall be anchored in accordance with **European standards** in order to be eligible for the full level of grade indicated insurance cover.

Client: _____

Installation Address: _____

Details of the safe and installation:

Manufacturer:	Date of manufacture:
Model:	Weight in Kg:
Certified Grade	Certification Body
Site of Installation:	
Anchorage Wall or Floor:	
Floor/Wall Construction Type:	

Description of anchorage, if divergent from European standards: _____

Conformity declaration:

The undersigned confirms and guarantees that the safe detailed above has been anchored in accordance with the manufacturer's instructions and European standards. Where anchorage to these specifications was not possible the reason for this divergence has been noted.

Signature of installer:

Date of installation:

Name of Installer:
(BLOCK CAPITALS)

Conformity Declaration for the anchorage of safe received on the _____

Signature of client:

Name of client:
(BLOCK CAPITALS)