

An tÚdarás Slándála Príobháidí  
The Private Security Authority

**AUDITING GUIDELINES**

**FOR**

**AUDITING BODIES**

**FOR**

**PSA 42:2015**

**2024**

**EDITION**

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## 1. AUDITING GUIDELINES

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 areas regulated by the PSA is the Private Investigator sector. The PSA has prescribed *PSA Licensing Requirements – Private Investigators (PSA 42:2015)* as the standard to be observed by contractors in this sector.

These guidelines set out the auditing requirements to be followed by approved auditing bodies when auditing organisations in the Private Investigator sector for *PSA 42:2015* certification. The guidelines should be read in conjunction with the PSA requirements document *PSA Licensing Requirements - Private Investigators (PSA 42:2015)*. For ease of use, this document includes the relevant clause from PSA 42:2015 with the auditing guidelines.

The guidelines will be reviewed on a regular basis and updated versions will be provided to auditing bodies and made available on our website, [www.psa-gov.ie](http://www.psa-gov.ie).

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

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## **2. GENERAL**

### **2.1 PSA Licensing Requirements**

The PSA requirements document “*PSA Licensing Requirements - Private Investigators (PSA 42:2015)*”, hereinafter referred to as PSA 42:2015, sets out the requirements to be achieved and maintained by contractors applying for a licence from the PSA in the Private Investigator sector.

Contractors seeking a licence from the PSA must comply with PSA 42:2015. A contractor’s compliance shall be assessed against the requirements document by PSA approved auditing bodies in accordance with these guidelines.

### **2.2 Auditing Bodies**

**2.2.1** Certification for licensing purposes will only be accepted from auditing bodies approved by the PSA.

**2.2.2** Auditing bodies shall agree in writing to be bound by these auditing guidelines before the PSA will accept evidence of certification from them.

### **2.3 Audits**

**2.3.1** Contractors shall be subject to an audit by an approved auditing body 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 PSA 42:2015.

#### **Non Compliance: Category 1**

**2.3.2** The PSA may request auditing bodies to focus their audit on certain areas of an organisations activities. Such requests will be within the terms of PSA 42:2015.

**2.3.3** 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 42:2015 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.

**2.3.4** 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 body corporate, sole trader to partnership, partnership to a body corporate.

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.

**2.3.5** Organisations that change address shall be subject to a visit at their new address before their certification can be amended.

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

**2.3.7** Where PSA 42:2015 or these guidelines require an auditor to inspect or sample records or other documents the auditor shall select at random the ones to be audited from a list of such records or documents. 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.

As a minimum, the size of a sample shall equal the square root of the total records. 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.

**2.3.8** 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.

At the same time, the auditing body shall email the PSA a copy of each new certificate (in PDF format).

**2.3.9** When an audit has been completed the auditing body shall notify the PSA of same and provide a copy of the audit report to the PSA on request.

Note: Provision of a copy of the certificate of compliance/registration in accordance with clause 2.3.8 shall be accepted as notification.

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

**2.3.11** Where a contractor fails to obtain full compliance to PSA 42:2015 or fails to arrange an audit for same, the auditing body shall notify the PSA.

## **2.4 Absence of Contracts**

**2.4.1** Where an organisation who holds a PSA licence is unable to complete an audit because of an absence of contracts the requirements of **CB 3:2016** shall come into operation.

## **2.5 Audit Compliance**

**2.5.1** Full compliance with PSA 42:2015 in accordance with **2.3** must be achieved before certification can be issued.

**2.5.2** 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.

**2.5.3** When corrective action has been completed, this should be recorded on the audit report together with details of how the corrective action was verified by the auditor, e.g. email, re-visit, etc.

**2.5.4** When finalized, audit reports should detail all non-compliances and corrective actions.

## **2.6 Audit Non-Conformances**

**2.6.1** Where a contractor fails to meet any of the requirements of PSA 42:2015 this shall be recorded as a non-compliance in accordance with the categories specified in these auditing guidelines. Organisations have 5 weeks from date of audit to rectify a non-conformance.

The following criteria shall apply to non-conformances.

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

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

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

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

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

**2.6.2** Where the 5 week period referred to in **2.6.1** has elapsed and an organisation has not passed an audit, the auditing 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.

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

## **2.7 Audit Reports**

**2.7.1** 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 auditing 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 (see **Annex B**).

**2.7.2** A copy of the audit report shall be sent by the auditing body to the PSA upon request. The report should be submitted with 14 days of receipt of such a request.

## **2.8 Certification**

**2.8.1** All certificates for PSA 42:2015 issued by auditing bodies shall contain the organisation's address as recorded on the organisation's PSA licence.

## 3. ORGANISATION

### 3.1 Ownership

3.1.1 Ownership and management of the service provider shall be clearly stated in writing, and all individuals having shareholdings or control shall be properly identified.

**AG** - 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 body corporate 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 of all directors of the organisation shall be established and recorded and a record of the results of the screening of such directors to be held on file and shall be disclosed to the client on request.

**AG** - 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 organisation's accountant or solicitor (See **Annex C**).

**Non Compliance: Category 3 for director's name and contact details not recorded  
Category 1 for breaches of screening requirements**

3.1.3 Since the 1st December 2015 an organisation applying for a licence must provide evidence that they possess the competence to provide a security service. Competence may be demonstrated by the following means:

- a) 5 years continuous experience in the field of investigation within the previous 10 years,  
**or**
- b) such other means as may be approved by the PSA.

Note: Where an organisation is a body corporate at least one director must demonstrate that they possess the required competence, where an organisation is a partnership at least one partner must demonstrate that they possess the required competence, all sole traders must demonstrate that they possess the required competence.

**AG** – From the 1st November 2022 all applicants will be assessed under subsection b.

Applicants must have successfully completed the Private Investigator Training Course (See PSA Information Note PSA 87:2022) and provide verified evidence of 5 years continuous experience in investigation in An Garda Síochána, other police force, private investigator



business or similar, or,

have successfully completed the Private Investigator Training Course (See PSA Information Note PSA 87:2022) and provide evidence of such other means as may be required by the PSA.

The auditor shall confirm the organisation has written confirmation from the PSA that the requirements of Clause 3.1.3 have been satisfied.

**Non Compliance: Category 1**

**3.1.4** Where directors involved in operational activities are also employees of the organisation they shall hold a current PSA employee licence covering, as a minimum, the primary service provided by the organisation.

**AG** –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**

**3.1.5** Details of discharged or undischarged bankruptcy of a principal or director of the organisation shall be held on file and disclosed to the client on request.

**AG** - 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**

**3.1.6** Where applicable, all principals of the organisation shall sign a declaration setting out their beneficial interests in other organisations subject to licensing by the PSA.

**AG** - 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**

**3.1.7** All operational supervisory and management staff shall hold a current PSA employee licence in accordance with PSA requirements, for each activity subject to the PSA licensing, carried out by such staff.

**AG** – 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**

### 3.1.8 – Additional Auditing Requirements

**AG** - 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**

### 3.1.9 – Additional Auditing Requirements

**AG** - The organisation shall provide the auditor with a detailed organisation chart showing all persons involved in the management or 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 account 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 organisation shall ensure that a valid e-tax clearance certificate is held on site at the address recorded on the Private Security Services Licence during the term of the licence.

**AG** – The organisation must be tax compliant. Holders of eTax Clearance certificates shall provide the Tax Reference Number (TRN) and Tax Clearance Access Number (TCAN) and allow authorised officials access to Revenue.ie to allow verification.

Where access to the Revenue On-Line System (ROS) is carried out by an agent, organisations shall provide an up to date “hard copy” of the certificate, the date it was printed showing at the bottom of the document.

The auditor shall inspect the organisation’s tax clearance record through Revenue.ie and verify that it relates to the organisation and is valid. The following details from the tax clearance certificate shall be recorded in the audit report: date accessed and Tax Clearance Certificate number.

Organisations based outside of the State who are not obliged to register for tax may produce a “hard copy” Tax Clearance Cert.

**Non Compliance: Category 1**

**3.2.2** Loans from directors and/or shareholders shall be loan capital, subordinated to all other creditors.

**AG** - 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** Each organisation shall produce and make available on request by authorised officials a cash flow statement for the current accounting period. For new organisations a cash flow forecast for the first 12 months of business shall be provided.

**AG** - Cash flow statements shall be required from:

- New organisations who are having their first PSA 42 audit,
- Organisations who are unable to provide a tax clearance certificate on the day of the auditors visit,
- 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– Additional Auditing Requirements**

**AG** - 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** All insurances shall be relevant to the nature of the business undertaken. Motor insurance and Professional Indemnity insurance are essential requirements. Other insurance cover necessary may include, where the service provided dictates, but is not limited to cover for the following:

- Employer liability
- Public Liability
- Product Liability
- Efficacy

**AG** - 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
- Product Liability
- Motor insurance
- Efficacy
- Other (please specify)

**Non Compliance: Category 1**

### **3.4 Premises**

**3.4.1** The organisation shall have an administrative office where records, together with all professional and business documents, certificates, correspondence and files necessary to the proper conduct of business shall be kept in a secure confidential manner.

**AG** - 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** Any administrative office covered by **3.4.1** above shall be protected by an intruder alarm system installed and maintained in accordance with prevailing PSA requirements. The organisation shall keep a written record containing the name, address, contact number and PSA licence number of the intruder alarm installer as well as details of the maintenance and service history.

**AG** - 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.

**Non Compliance: Category2**

### 3.4.3 The alarm shall be remotely monitored by

- a) a PSA licensed Alarm Monitoring Centre or,
- b) a 24 hour monitoring system with signaling to at least 3 different locations or
- c) such other means as may be approved by the PSA

**AG** - The auditor shall confirm that the alarm is remotely monitored by one of the following:  
- 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.

- monitoring centre certified to EN 50518/BS 5979 or equivalent standard recognised by the PSA where the administrative office is located outside of Ireland. The name and location of the monitoring centre shall be recorded in the audit report.

**Non Compliance: Category 2**

## 3.5 Organisation Information

**3.5.1** The organisation shall clearly state its PSA licence number(s) for all categories for which it is licensed to provide services on all organisational letterheads, contracts and advertising and promotional documents and/or media.

**AG** - The auditor shall inspect the organisation's letterheads, advertising, promotional documentation and contracts and confirm the presence of the organisation's 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 for breaches relating to licence number.  
Category 1 for failing to hold a PSA licence in sectors where services are being provided.**

**3.5.2** The organisation shall provide each client with a contract in writing or other equivalent form. Such contract shall include the following minimum provisions in respect of the organisation providing the service:

- (a) Total costing (including VAT) for the service to be provided and the arrangements for payment.
- (b) The scope and extent of the service to be provided.
- (c) Obligations to the client.
- (d) Agreement on conditions for the use of subcontractors, where applicable.
- (e) Period of the contract and requirements for its termination with specific reference to any exclusions, penalty clauses or other restrictions.
- (f) Details of complaints procedures and complaints management procedures.

- (g) The scope of the service to be provided. Statement of compliance with the provisions of the Data Protection Acts.

**AG** - For the purposes of 3.5.2 and 3.5.3 of PSA42:2015, 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 associated exclusions, penalty clauses or restrictions)
- Agreed levels of response, means of reporting and exchange of Information
- Safety Statement
- Complaints procedures and complaints management procedures
- Agreed scope of service to be provided

**Non Compliance: Category 2**

**3.5.3** The contract shall be signed by a principal of the organisation and of the client and a copy retained by each. Where the client chooses not to sign or return a contract the organisation shall maintain evidence on file of postage (registered) or delivery of the contract to the client and any subsequent correspondence.

**AG** - 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 use of subcontractors is provided for under the terms of the contract or agreement, the organisation which is the party contracted to provide the service to the client shall require the subcontractor to provide evidence of compliance with prescribed standard(s), as well as evidence of holding a current valid PSA licence, before engaging the services of that subcontractor.

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

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

**Non Compliance: Category 1**

### 3.6 Quotations in pursuance of Contracts or Business

3.6.1 Each organisation shall provide each prospective client with a clear written quotation which shall, if agreed and accepted, form part of the contract.

**AG** - 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 42:2015.

**Non Compliance: Category 2**

3.6.2 The documented quotation shall include the total cost for the service and method(s) of payment.

**AG** - As per 3.6.1

### 3.7 Compliance with Legislation

3.7.1 The organisation shall have and make available to a client or potential client a current statement signed and dated by a principal of the organisation, of its 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.
- National and EU product compliance legislation.

Relevant verification shall be available to all statutory bodies and their agents, including but not limited to:

- The Private Security Authority.
- Workplace Relations Commission.
- Auditing bodies approved by the Private Security Authority.
- The Data Protection Commissioner.

**AG** - 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.
- National and EU product compliance legislation.

The statement (see **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**



## 4. STAFFING

### 4.1 Selection and Pre-Employment Screening

#### 4.1.1 General

4.1.1.1 The organisation shall carry out detailed pre-employment enquiries to ensure that all personnel are competent and of good character.

**AG** - 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 All persons offered employment by the organisation for posts involving services subject to licensing by the PSA or posts involving access to details of clients shall be screened.

**AG** - 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, call handling or 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 Self-employed persons whose sole function is to provide a security service as a private investigator to the organisation shall be screened.

**AG** - The auditor shall inspect the records of self-employed persons who fall within the definition of employee contained in PSA 42:2015 and confirm the required screening has taken place.

**Non Compliance: Category 1**

4.1.1.4 All agency staff engaged by the organisation for posts involving services subject to licensing by the PSA or posts involving access to details of clients shall be screened

**AG** - The auditor shall inspect the records of all relevant agency staff and confirm the required screening has taken place.

**Non Compliance: Category 1**

4.1.1.5 A personnel file shall be established for each person subject to screening.

**AG** - 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** shall be completed.

**Non Compliance: Category 1**

**4.1.1.6** All applicants for relevant employment shall be required to provide the following:

- (a) An acknowledgement, signed and dated by the applicant, that misrepresentation, or failure to disclose material facts may constitute grounds for dismissal.
- (b) A signed statement authorising an approach to former employers, State institutions, personal referees, etc., for verification of their career and employment record.

**AG** - 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 **4.1.1.6** of PSA 42:2015.

**Non Compliance: Category 2**

**4.1.1.7** Probationary employment shall be for a period of 6 months and in no case shall exceed a period of nine months.

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

**Non Compliance: Category 3**

**4.1.1.8** Certified copies of all relevant personnel and screening documentation shall be held on file.

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

**Non Compliance: Category 1**

**4.1.1.9** The requirements in Section 4.1 shall be applied equally to full-time and to part-time employees and at all levels of seniority, including directors.

**AG** - 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**

**4.1.1.10** The relevant provisions of these requirements shall apply to all ancillary staff including those employed on a temporary basis.

**AG** - 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**

**4.1.1.11** The screening period shall not be less than five years or from school leaving, whichever is the shorter duration.

**AG** - The auditor shall confirm that screening periods are in accordance with clause **4.1.1.11** of PSA 42:2015.

**Non Compliance: Category 1**

**4.1.1.12** The employee shall be classed as 'employed subject to satisfactory screening' whilst screening is continuing and shall be subject to a strict system of monitoring and supervision during this period.

**AG** - The auditor shall inspect the organisation's provisional employment procedures to ensure the satisfactory monitoring and supervision of such personnel during the provisional period of employment.

**Non Compliance: Category 1**

**4.1.1.13** Screening covering the whole of the screening period shall be completed no later than ten weeks after employment has commenced.

**AG** - The auditor shall inspect personnel files and confirm that screening has been completed within the time frame required in clause **4.1.1.13** of PSA 42:2015.

**Non Compliance: Category 1**

**4.1.1.14** Full screening for the period covered under 4.1.1.11 above shall apply. Screening for a shorter period can be carried out where:

- (a) an employee or director holds a current PSA licence, and
- (b) has, immediately prior to the commencement of this employment, been employed by another licensed security provider, and
- (c) the previous employer referred to in b) has carried out the full screening requirements within the preceding five years.

Where (a), (b) and (c) above apply, screening shall be carried out from the date the screening by the previous employer had been conducted until the commencement of this employment.

**AG** - The auditor shall confirm that where screening for a shorter period has occurred it is carried out in accordance with clause **4.1.1.14** of PSA42:2015.

**Non Compliance: Category 1**

**4.1.1.15** Where the provisions of 4.1.1.14 apply, the previous licensed employer shall, upon receipt of a written request by an immediately subsequent employer covered by this standard, forward those parts of the employee's personnel file relating to details of screening and training undertaken by the previous employer. Any requested details in relation to other parts of the personnel file held by the previous employer shall be released only where the employee gives permission in writing to the previous employer to release such details.

**AG** - Where applicable, auditors shall confirm that employees have provided permissions to former employers as required in accordance with clause **4.1.1.15** of PSA 42:2015.

**Non Compliance: Category 1**

## 4.1.2 Pre-Employment Interview

4.1.2.1 Prior to the interview the applicant shall submit a curriculum vitae or other documentation containing:

- (a) A list of the applicant's previous employers along with dates worked for each employer.
- (b) Contact details for previous employers listed.
- (c) Details of relevant training, qualifications and experience together with supporting documentation.
- (d) Periods of unemployment.
- (e) Applicant's current place of residence.

**AG** - 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 relevant Training and Experience,
- Applicant's current address,
- Dates of unemployment.

**Non Compliance: Category 2**

4.1.2.2 A personal interview of a duration sufficient to assess the following shall be conducted by the organisation:

- (a) The general ability, both physical and intellectual of the applicant and the overall demeanour of the applicant.
- (b) Verification of personal documents e.g. birth certificate, driving licence, passport, service records, current security licence, work visa etc.
- (c) The applicant's previous employment history and experience, including reason(s) for leaving previous employments.
- (d) Verification of qualifications/training.
- (e) The level of occupational fluency in respect of reading, writing and oral communication in the English language.
- (f) The applicant's experience, if any, in the security industry.

**AG** - The auditor shall confirm that the personal interview has been carried out and the requirements relating to clause 4.1.2.2 of PSA 42:2015 have been met.

**Non Compliance: Category 2**

4.1.2.3 Interview notes evidencing that the requirements set out in clause 4.1.2.2 above have been addressed shall be taken by the organisation and retained on the personnel file of the applicant.

**AG** - 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 42:2015 have been met.

**Non Compliance: Category 2**

### 4.1.3 Character and OtherReferences

**4.1.3.1** Screening procedures shall include direct reference to former employers, educational authorities, etc., with confirmation by them, in writing, of periods of employment contributing to a continuous record of the career or history of the person being screened for the whole of the screening period, on a month-to-month basis. The direct reference shall include at least one attempt, in writing, by the organisation to obtain the continuous record referred to in this requirement.

**AG** - 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 42:2015.

**Non Compliance: Category 1**

**4.1.3.2** Where initial references are taken by telephone the following procedures shall be used:

- (a) The telephone number of the person called shall be confirmed independently.
- (b) Information given on the telephone by a referee shall be noted at the time of making the telephone call and shall be signed and dated by the member of staff making the telephone call and retained on the individuals screening.
- (c) A written request for written confirmation of the information given by telephone shall be forwarded to the referee within two working days of the telephone call being made.
- (d) The screening process shall not be regarded as complete until written evidence is obtained.
- (e) The progress sheet shall be used to monitor and record the action taken.

**AG** - The auditor shall confirm that where references have been taken by phone the requirements set out in clause 4.1.3.2 of PSA 42:2015 have been followed.

**Non Compliance: Category 1**

**4.1.3.3** Only documents from third parties such as employers, colleges, Department of Social Protection, solicitors, accountants, etc., are acceptable for screening purposes.

*Note. For the purposes of this document CVs or other personal documents are not acceptable as evidence of screening.*

**AG** - The auditor shall inspect the third party documents provided for screening purposes and confirm that they are in accordance with clause of PSA 42:2015.

**Non Compliance: Category 1**

#### 4.1.4 Evidence of Qualifications/Awards

4.1.4.1 Prior to commencement of employment the organisation shall ensure that the applicant has any qualifications or awards necessary for the duties to which the applicant will be employed.

**AG** - 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 organisation shall ensure that all necessary documentation for work visa applications and permissions/authority to work is fully completed before the individual is employed. This applies to renewal of such applications also.

**AG** - The auditor shall ask the organisation if they employ any persons requiring permission to work in Ireland. 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 of PSA 42:2015. 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 organisation shall maintain a register of all employees who have applied for and obtained permission or authorisation from the State to work in Ireland. The organisation shall review the validity of these permissions or authorisations at least every 6 months and shall keep a documented record of such reviews.

**AG** - 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 organisation shall ensure that the register at 4.1.5.2 is held on site at the address recorded on the Private Security Services Licence.

**AG** - 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 basic details of the employee, covering verifiable history within the industry, dates employed, positions held, disciplinary offences and a comment on suitability for employment in the security industry shall be retained for not less than five years from the date the employment ceases. This information shall be verifiable in the form of readily retrievable records held at the organisations premises.

**AG** - The auditor shall inspect the records of employee's details and confirm that they comply with the requirements contained in clause 4.1.6.1 of PSA 42:2015.

**Non Compliance: Category 2**

**4.1.6.2** All records covered by 4.1.6.1 above shall be kept safe and secure against unauthorised access to, or alteration, disclosure or destruction of the data and against their accidental loss or destruction. Employers shall ensure that the records are retained for no longer than is necessary and in accordance with the recommendations of the Office of the Data Protection Commissioner.

**AG** - 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 them self that such storage arrangements are in accordance with clause **4.1.6.2** of PSA 42:2015. 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** A list of all personnel currently employed both on a permanent and a probationary basis shall be maintained, and in the case of those employed on a probationary basis, giving the dates on which probationary employment commenced and is to cease for each individual.

**AG** - The auditor shall confirm that details of current employees are held in accordance with clause **4.1.6.3** of PSA 42:2015.

**Non Compliance: Category 2**

#### **4.1.7 Screening and Acquired Companies**

**4.1.7.1** Where it cannot be established by the records of an acquired organisation that screening to the required standard has already occurred, then this shall take place within a period not exceeding thirteen weeks from the date of acquisition.

**AG** - Where applicable, the auditor shall confirm that screening has taken place in accordance with clause **4.1.7.1** PSA 42:2015.

**Non Compliance: Category 1**

#### **4.2 Terms of Employment**

**4.2.1** All employees shall receive a clear, concise and unambiguous contract of employment and a staff handbook.

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

**Non Compliance: Category 1**

**4.2.2** In addition to any mandatory requirements, terms of employment shall include the following information:

- a. Job title.
- b. Effective start date.
- c. Probationary period.
- d. Pay and Allowances.
- e. Hours of work, days of work, shift frequency and shift variables.
- f. Holiday entitlement.
- g. Sick pay (conditions of payment) and pension entitlement.
- h. Industrial injury procedure.
- i. Location of place of work (employer's address).
- j. Equipment to be supplied.
- k. Disciplinary and grievance procedures.
- l. Terms of notice and termination.
- m. Copies of any Collective Agreement covering the employment.
- n. Appeals procedure.
- o. The Organisation's Health and Safety Statement.
- p. The Organisation's Equality policy.

**AG** – The auditor shall confirm that terms of employment are in accordance with clause 4.2.2 of PSA 42:2015.

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

**Non Compliance: Category 2**

### **4.3 Code of Conduct**

**4.3.1** All employees shall be instructed that under the terms and conditions of employment they shall:

- (a) Complete the required tasks promptly and diligently, unless there is due and sufficient cause not to.
- (b) Ensure that all oral or written statements made by them, of whatever description, are true and accurate.
- (c) Maintain carefully all documents and ensure that any alterations, disposal, or erasure of documents is carried out only with proper authorisation.
- (d) Maintain confidentially on any matter relating to the employer or his clients either past or present.
- (e) Ensure that any actions taken by them are such as not to bring discredit on the employer, the client or fellow employees.
- (f) Immediately notify any conviction for a relevant criminal or motoring offence to the employer.
- (g) Not allow unauthorised access to a client's premises.
- (h) Ensure that they use employer's equipment or facilities only with authorisation.
- (i) Continuously satisfy the requirements of PSA licensing.
- (j) Carry a correct identity badge or licence card, as prescribed by the PSA, at all times whilst on duty.

**AG** - The auditor shall confirm that the organisation's code of conduct is in accordance with clauses 4.3.1 and 4.3.3 of PSA 42:2015.

**Non Compliance: Category 2**



**4.3.2** The code of conduct shall be signed by all employees.

**AG** - 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).

**Non Compliance: Category 2**

**4.3.3** Employers shall treat employees with courtesy and respect.

**AG** - As per 4.3.1

#### **4.4 Identification**

**4.4.1** The organisation shall ensure that all operational employees are licensed.

**AG** - The auditor shall confirm that the organisation complies with the requirements that all operational employees hold a PSA Individual Licence.

**Non Compliance: Category 1**

**4.4.2** All employees shall be instructed on PSA requirements for carrying their licence card

**AG** - The organisation shall provide evidence that all employees have been instructed on PSA requirements for having their licence card on their person when providing security services.

**Non Compliance: Category 2**

## 5. TRAINING

### 5.1 Training Policy and Responsibility

**5.1.1** The organisation shall have a clearly defined, documented training policy, authorised at senior management level within the organisation. The policy shall cover theoretical and practical skills and meet any training requirements laid down by the Private Security Authority.

**AG** - 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 5.1.3 of PSA 42:2015.

**Non Compliance: Category 1**

**5.1.2** The organisation shall appoint a member of the management team as training administrator.

**AG** - 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 training policy shall include a commitment to assess the effectiveness of all operational staff and to provide additional training where required.

**AG** - The auditor shall verify that the training policy includes procedures to assess staff and provide additional training.

**Non Compliance: Category 2**

### 5.2 Induction Training

**5.2.1** Training shall include a detailed organisation- specific, induction session covering organisation structure, ethos, policies and employee roles and responsibilities for all newly recruited employees. This element of training shall be delivered before the employee commences operational duties. Each employee shall acknowledge receipt of this training and associated documentation by signing a declaration. Such training shall be delivered by a competent member of staff and shall be recorded and this record retained.

**AG** - The auditor shall inspect the content of the organisation's induction session and confirm that it meets the requirements set out in clause 5.2.1 of PSA 42:2015

**Non Compliance: Category 3**

### 5.3 Refresher Training

**5.3.1** Procedures shall exist to assess the effectiveness of all employees, and where required refresher training shall be carried out.

**AG** - The auditor shall inspect the training procedures and confirm that processes are in place to assess the effectiveness of all employees and that any required refresher training is carried out and recorded in accordance with clause 5.3.1 of PSA 42:2015.

**Non Compliance: Category 2**

**5.4 Specialist Training**

**5.4.1** Employers shall ensure that employees required to carry out duties or use equipment of a specialist nature are certified as having received the appropriate training in the subject matter.

**AG** - 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 in accordance with clause 5.4.1 of PSA42:2015.

**Non Compliance: Category 2**

**5.5 Supervisory and Management Training**

**5.5.1** Subject to PSA requirements and any associated guidelines, the organisation shall ensure that all operational supervisory and management staff receive documented training in consideration of their position and responsibilities.

**AG** - The auditor shall inspect the organisation's supervisory and management training records and confirm that they are in accordance with clause 5.5.1 of PSA 42:2015

**Non Compliance: Category 2**

**5.6 Training Records**

**5.6.1** The training administrator shall ensure that proper training records are maintained.

**AG** - The auditor shall inspect the organisation's training records and confirm that they are maintained in accordance with section 5.6 of PSA 42:2015.

**Non Compliance: Category 2**

**5.6.2** Individual training records relating to training provided by the organisation shall indicate the date, training organisation, details of certification and subject(s) covered. These training records shall be signed by the employee and countersigned by the training administrator and retained as part of the employee's record.

**AG** - As per 5.6.1

**5.6.3** Verification of all training shall be available for inspection on site at the address recorded on the Private Security Services Licence.

**AG** - As per 5.6.1

**5.6.4** All refresher training undertaken by employees shall be recorded and the record held and retained on the employee's personnel file by the employer.

**AG** - As per 5.6.1

**5.6.5** Records shall indicate where further training is required.

**AG** - As per 5.6.1

## 6. OPERATIONS

### 6.1 Security

6.1.1 Procedures shall be established for all staff to ensure the security of information and property to which they have access during the course of their employment.

**AG** – The auditor shall inspect the organisation’s procedures for staff dealing with or having access to information and/or property during the course of their employment and confirm that they meet the requirements of clause 6.1.1 of PSA 42:2015.

**Non Compliance: Category 1**

6.1.2 Organisations shall have security measures in place to prevent any unauthorised or unlawful access, disclosure, loss, destruction or damage to information held.

**AG** - The auditor shall inspect the organisation’s security measures and confirm that they meet the requirements of Clause 6.1.2 of PSA 42:2015.

**Non Compliance: Category 1**

6.1.3 Organisations shall have procedures in place to ensure the security of information held in an electronic format. Appropriate security measures such as passwords and encryption shall be in place and back up records held securely. Confidential records held in an electronic format shall be backed up at least once a week. Back up records shall be held securely and in such a manner that a threat to the integrity of one set of records will not pose a threat to the other set.

**AG** - The auditor shall inspect the organisation’s procedures for ensuring the security of information held in an electronic format and confirm that the requirements of clause 6.1.3 of PSA 42:2015 are being met.

**Non Compliance: Category 1**

6.1.4 Organisations shall have procedures in place to ensure the security of

- (a) all information obtained from a client,
- (b) all information obtained during the course of an investigation on behalf of a client,
- (c) all information relating to the provisions of services to a client.

The procedures shall ensure that all such information obtained under (a) or (b) is handed over to the client at the conclusion of the investigation.

Organisations must comply with the requirements of Data Protection legislation.

**AG** - The auditor shall inspect the organisation’s procedures in relations to the security of the information described in clause 6.1.4 of PSA 42:2015. The auditor shall confirm that the requirements of clause 6.1.4 of PSA 42:2015 are being met.

**Non Compliance: Category 1**

**6.1.5** Organisations shall keep confidential any knowledge of their clients business or operations acquired through the provision of services. Any details, the disclosure of which can be reasonably construed as compromising the business or security of the client, shall not be disclosed or made known in any way to a third party or third parties, except with the express written permission of the client. Where written permission is granted, the organisation shall retain this on file and shall produce this if requested by an appropriate authority.

**AG** - The auditor shall inspect the organisation's procedures for ensuring the confidentiality and security of any details relating to client's business, operations or other matters and confirm that they meet the requirements of clauses **6.1.5** of PSA 42:2015.

**Non Compliance: Category 2**

**6.1.6** All records shall be kept for a minimum of three years and shall include details of the service provided and the name and PSA licence number or works number of the person(s) who provided any licensable services. Upon expiration of the required retention period the organisation shall dispose of the relevant records in a secure and confidential manner.

Note: National legislative requirements may entail retention of records for longer periods of time.

**AG** - The auditor shall inspect the organisation's records of visits to client premises and confirm that the details held in the records and their subsequent disposal meet the requirements of clause **6.1.6** of PSA 42:2015.

**Non Compliance: Category 3**

## **6.2 Vehicles and Equipment**

**6.2.1** Employers shall ensure that driving licences of staff involved in driving operational vehicles are valid for the duration of each such employee's period of employment. Driving licences shall be inspected annually and a record of this kept on file.

**AG** - 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 **6.2.1** of PSA 42:2015 are met.

**Non Compliance: Category 2**

**6.2.2** All vehicles and equipment used in connection with the provision of services shall be in working order and be regularly maintained.

**AG** - The auditor shall confirm that vehicles and equipment are in working order and shall inspect the maintenance and service documentation and confirm that maintenance and service is in accordance with manufacturer's recommendations.

**Non Compliance: Category 3**

**6.2.3** All employees shall sign for all equipment issued and give an undertaking to return any equipment issued immediately on request.

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

**Non Compliance: Category 3**

## 7 COMPLIANCE WITH PSA LICENSING

### 7.1 Compliance with Standards

7.1.1 Organisations shall maintain compliance with this standard during the term of the licence. Failure to maintain compliance may result in the PSA taking action against the licensee up to and including the revocation of the licence.

**AG** - The auditor shall record any instances of non-compliance with PSA 42:2015 which come to their attention in the audit report.

7.1.2 Organisations shall be subject to an audit by an approved auditing body 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.

**AG** - 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 organisations control it shall be recorded as a non-compliance.

**Non Compliance: Category 1**

7.1.3 Organisations shall provide the auditing body with access to all documents required to undertake the audit. Where documents, such as contracts, contain information relating to the client's business, this information may be redacted for the audit.

**AG** - The auditor shall confirm that the organisation has provided access to all documents required to undertake the audit.

**Non Compliance: Category 1**

7.1.4 An audit report shall be completed by the approved auditing body for each audit undertaken and the organisation shall agree to the auditing body providing a copy of the report to the PSA.

**AG** - The auditor shall confirm that the organisation has agreed that a copy of the audit report shall be provided to the PSA.

**Non Compliance: Category 1**

7.1.5 Organisations shall give their permission to the approved auditing body to provide the PSA with information in accordance with provisions 7.1.3 and 7.1.4.

**AG** - The auditor shall confirm that the organisation has provided the permissions required in 7.1 of PSA 42:2015.

**Non Compliance: Category 1**

7.1.6 Where an organisation fails to undertake or complete an audit the auditing body shall notify the PSA of the failure and the reason for same.

7.1.7 Where an organisation is found to be noncompliant with a standard the auditing body shall notify the PSA of the reason for the noncompliance and any resulting action taken against the organisation.

## 7.2 PSA Licensing Requirements

**7.2.1** 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.

Not applicable to certification audits

**7.2.2** 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) Organisation of Working Time Acts.
- c) Taxation and Social Welfare Acts.
- d) Payment of Wages Acts.
- e) Immigration Acts.
- f) Health and Safety at Work Regulations.
- g) National and European Product Compliance Legislation.

**AG** - The auditor shall confirm that the organisation complies with the requirements of clause 7.2.2 of PSA 42:2015.

**Non Compliance: Category 2**

**7.2.3** 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 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 of the organisation. In the case of a partnership this includes any conviction

**AG** - The organisation shall provide the auditor with a statement signed by a principal of the organisation confirming either:

- that the requirements of clause 7.2.3 of PSA 42:2015 has not applied to them since their last audit.
- that they have complied with the requirements of clause 7.2.3 of PSA 42:2015 and notified the PSA in a change in their circumstances. Details of the change should be set out in the statement.

The statement shall be signed by the principal within 1 month of the commencement of the audit and it shall be attached to the audit report.

**Non Compliance: Category 2**



against a partner.

**Annex A - Sample PSA 42:2015 Audit Report**

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

**Auditing Guidelines**

<b>Requirements</b>	<b>Report</b>
<b>1. GENERAL</b>	
<b>1.2 Audits</b>	
<b>1.2.2</b> Where the PSA has requested that an audit focus on certain areas of an organisation's activities a brief report in addition to the specific PSA 42:2015 requirements shall be provided. This report may include the auditor's observations, organisations response to audit, etc.	

**PART 1 COMMON PROVISIONS**

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>3. ORGANISATION</b>					
<b>3.1 Ownership</b>					
<p><b>3.1.1</b> Names and contact details of each person to be recorded:</p>					
<p><b>3.1.2</b> Names and contact details of all directors and company secretary to be recorded:</p> <p>Screening requirements met:</p> <p>Declaration signed by accountant/solicitor where director/company secretary with company in excess of 5 years:</p>					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<p><b>3.1.3</b> Verified evidence of 5 years continuous experience provided:</p> <p>Where was experience obtained:</p>					
<p><b>3.1.4</b> Details of any Director who is an operational employee:</p>					
<p><b>3.1.5</b> Details of any bankrupt person:</p>					
<p><b>3.1.6</b> Details of any beneficial interest in another organisation:</p>					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>3.1.7</b> Name and PSA licence number of all supervisory and management staff who undertake licensable activities:					
<b>3.1.8</b> Names and contact details of any person who is a beneficiary or who has a material interest in the organisation:					
<b>3.1.9</b> 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
<b>3.2 Finance</b>					
<b>3.2.1 e-TCC verified:</b>  TCC/Access No:  Issued/Printed Date:  Valid Until:					
<b>3.2.2 Details of any director or shareholder loans:</b>  Date of Loan:  Amount of Loan:  Who the Loan is From:  Amount of repayments made:  Date of repayments:  Amount of Loan Outstanding:					
<b>3.2.3 Cash Flow Statement inspected:</b>  Copy Provided:					
<b>3.2.4 Statement on bank signatories provided:</b>					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>3.3 Insurance</b>					
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
<b>3.4 Premises</b>					
<b>3.4.1</b> All records, etc. stored in secure confidential manner:					
<b>3.4.2</b> Details of intruder alarm:					
<b>3.4.3</b> Details of Alarm Monitoring :					
<b>3.5 Organisation Information</b>					
<b>3.5.1</b> 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
<b>3.5.2</b> Written contracts inspected and required details included therein:					
<b>3.5.3</b> Contracts signed and delivered to client as required:					
<b>3.5.4.</b> Details of sub-contractor(s) including PSA licence number and expiry date:					
<b>3.6 Quotations for Contracts</b>					
<b>3.6.1</b> Written quotation comply with requirements:					
<b>3.6.2</b> Written quotation comply with requirements:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>3.7 Compliance with Legislation:</b>					
<b>3.7.1</b> Statement on compliance with legislation provided:					
<b>4. STAFFING</b>					
<b>4.1 Selection &amp; Pre-Employment Screening</b>					
<b>4.1.1 General</b>					
<b>4.1.1.1</b> Pre-employment records inspected:  Required enquiries completed:					
<b>4.1.1.2</b> Required screening undertaken:					
<b>4.1.1.3</b> Confirm screening has taken place for relevant self-employed persons:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.1.1.4 Confirm screening has taken place for agency staff					
4.1.1.5 Required personnel files exist:					
4.1.1.6 Statements of Authorisation on files:					
4.1.1.7 Probationary Employment time frame meets requirements:					
4.1.1.8 Certified copies of personnel and screening documentation on file:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<p><b>4.1.1.9</b> Screening records for part-time employees and directors inspected:</p> <p>Screening completed:</p>					
<p><b>4.1.1.10</b> Screening records for temporary &amp; ancillary staff inspected:</p> <p>Screening completed:</p>					
<p><b>4.1.1.11</b> Screening periods complied with:</p>					
<p><b>4.1.1.12</b> Monitoring &amp; supervision procedures for provisional employees in place:</p>					
<p><b>4.1.1.13</b> Screening completed within 10 weeks of employment commencing:</p>					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
4.1.1.14 Screening for shorter periods carried out in accordance with PSA requirements:					
4.1.1.15 Screening records provided in accordance with PSA requirements:					
<b>4.1.2 Pre-Employment Interview</b>					
4.1.2.1 Pre interview documents provided:					
4.1.2.2 Interview conducted to PSA requirements:					
4.1.2.3 Interview notes recorded in line with PSA requirements and retained on personnel files:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.3 Character and other references</b>					
<b>4.1.3.1</b> Screening procedures complied with:					
<b>4.1.3.2</b> Procedures for references by phone followed:					
<b>4.1.3.3</b> Requirements on third party documents met:					
<b>4.1.4</b> Evidence of Qualifications					
<b>4.1.4.1</b> Evidence of qualifications/awards received:  PSA Licence details provided prior to employment:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.5 Work Permits, Authorisations, etc.</b>					
<b>4.1.5.1</b> Does the organisation have any employees who require permissions to work:  All permissions in place prior to employment commencing:					
<b>4.1.5.2</b> Register of employees in place and in line with PSA requirements:					
<b>4.1.5.3</b> Current permissions are in place:					



Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>4.1.6 Maintenance and Retention of Records</b>					
4.1.6.1 All PSA required employee details held on file:					
4.1.6.2 Storage of Records secure:  Records retained in accordance with Data Protection Commissioner:					
4.1.6.3 List of personnel maintained as required:					
<b>4.1.7 Screening and Acquired Companies</b>					
4.1.7.1 Screening requirements for acquired companies met:					

<b>Requirements</b>	<b>Audit Outcome</b>	<b>Corrective Action Required</b>	<b>Timeframe for Corrective Action</b>	<b>Corrective Action Completed</b>	<b>Date Verified and Means of Verification</b>
<b>4.2 Terms of Employment</b>					
<b>4.2.1</b> Contract of employment and staff handbook issued to staff:					
<b>4.2.2</b> Terms of employment inspected and meet PSA requirements:					
<b>4.3 Code of Conduct</b>					
<b>4.3.1</b> Code of conduct meets PSA requirements:					
<b>4.3.2</b> Code of conduct signed by employees:					
<b>4.4 Identification</b>					
<b>4.4.1</b> Operational employees hold the relevant PSA Individual Licence:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<p><b>4.4.2</b> Instructions on requirements to have PSA Licence Card on person when providing a service:</p>					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>5. TRAINING</b>					
<b>5.1 Training Policy &amp; Responsibility</b>					
<b>5.1.1</b> Training Policy document inspected and PSA requirements met:					
<b>5.1.2</b> Details of Training Administrator:  Qualifications:					
<b>5.1.3</b> Training policy includes procedures to assess staff and provide additional training :					
<b>5.2 Induction Training</b>					
<b>5.2.1</b> Induction Training document inspected and PSA requirements met:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>5.3 Refresher Training</b>					
5.3.1 Refresher training requirements met:					
<b>5.4 Specialist Training</b>					
5.4.1 Specialist training provided where required:					
<b>5.5 Supervisory and Management Training</b>					
5.5.1 Appropriate training provided to operational supervisory and management staff:					
<b>5.6 Training Records</b>					
5.6.1 Training records inspected & maintained:					
5.6.2 Training records meet PSA requirements:  Refresher Training Recorded:  Further Training Indicated:					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>6. OPERATIONS</b>					
<b>6.1 Security</b>					
<b>6.1.1</b> Procedures in place for staff to ensure security of property and information:					
<b>6.1.2</b> Security measures for protection of information meet PSA requirements:					
<b>6.1.3</b> Security measures in place for information held in electronic format:  Procedures meet PSA requirements:					
<b>6.1.4</b> Security procedures in place for protection of all clients information:  Information handed over to clients at end of investigations:  Data Protection legislation complied with:					

<b>Requirements</b>	<b>Audit Outcome</b>	<b>Corrective Action Required</b>	<b>Timeframe for Corrective Action</b>	<b>Corrective Action Completed</b>	<b>Date Verified and Means of Verification</b>
<b>6.1.5</b> Procedures on confidentiality of clients activities meet PSA requirements:					
<b>6.1.6</b> Retention of records meet PSA requirements:					
<b>6.2 Vehicles and Equipment</b>					
<b>6.2.1</b> Driving licences valid:  Records held on file:					
<b>6.2.2</b> Vehicles maintained and serviced:  Equipment maintained and serviced:					
<b>6.2.3</b> Check records for issue and return of equipment					

Requirements	Audit Outcome	Corrective Action Required	Timeframe for Corrective Action	Corrective Action Completed	Date Verified and Means of Verification
<b>7. COMPLIANCE WITH PSA LICENSING</b>					
<b>7.1 Compliance with Standards</b>					
<p><b>7.1.1</b> Has organisation maintained compliance with standard:</p> <p>Instances of non-compliance not recorded elsewhere in audit report:</p> <p>Any other matter to be brought to the attention of the PSA:</p>					
<p><b>7.1.2</b> Duration since last audit:</p> <p>If greater than 12 months reasons for same:</p>					
<p><b>7.1.3</b> Has organisation provided access to all documents needed to undertake audit:</p>					



<b>Requirements</b>	<b>Audit Outcome</b>	<b>Corrective Action Required</b>	<b>Timeframe for Corrective Action</b>	<b>Corrective Action Completed</b>	<b>Date Verified and Means of Verification</b>
<b>7.1.5</b> Has organisation provided all permissions required:					
<b>7.2 PSA Licensing Requirements</b>					
<b>7.2.1</b> 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:					

## Annex B Ongoing Screening & Training records

Organisation: \_\_\_\_\_

Address: \_\_\_\_\_

PSALicence No. \_\_\_\_\_ Auditing Body \_\_\_\_\_

### Screening Records previously checked

Name	PPSN	Licence Number	Position in Organisation	Compliant Y/N

### Training Records previously checked

Name	PPSN	Licence Number	Position in Organisation	Compliant Y/N

Auditor: \_\_\_\_\_

Date: \_\_\_\_\_

Auditor Signature: \_\_\_\_\_

## Annex C Declaration by Director

Organisation: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

PSALicence No. \_\_\_\_\_ Auditing Body \_\_\_\_\_

I \_\_\_\_\_ actfor \_\_\_\_\_  
(Insert Name) (Organisation)

In the capacity of \_\_\_\_\_  
(Accountant/Solicitor)

I wish to confirm that the following Directors/Secretary has been with the organisation for a period of 5 years or more:

Name	Address	PPSN	Date of Birth

Accountant/Solicitor Signature: \_\_\_\_\_

Accountant/Solicitor Name: \_\_\_\_\_  
(Block Capitals)

Date: \_\_\_\_\_

## Annex D Declaration of Compliance with Legislation

To be completed not more than 2 weeks prior to annual PSA 42:2015 Audit

Organisation: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Registration No. \_\_\_\_\_ PSA Licence No. \_\_\_\_\_

I/We confirm that the organisation named above is in full compliance with all legislation including but not limited to the legislation indicated below

Health, Safety and Welfare at Work Act(s)	Compliant	<input type="checkbox"/>
Organisation of Working Time Act(s)	Compliant	<input type="checkbox"/>
Private Security Services Acts	Compliant	<input type="checkbox"/>
Data Protection Acts	Compliant	<input type="checkbox"/>
Taxation and Social Welfare Acts	Compliant	<input type="checkbox"/>
Payment of Wages Act	Compliant	<input type="checkbox"/>
Immigration Acts	Compliant	<input type="checkbox"/>
National and EU product compliance legislation	Compliant	<input type="checkbox"/>

I/We confirm that we are in full compliance with all current legally enforceable agreements and/or legislation in respect of rates of pay and all associated conditions

Authorised Signatory \_\_\_\_\_ Date: \_\_\_\_\_

## Annex E Checklist for Personnel Files

	Please Tick Box
1. Pre-employment records (Clause 4.1.2.1)	
2. Personnel file exists for all relevant staff including parttime employees and directors (Clauses 4.1.1.5, 4.1.1.9 & 4.1.1.10)	
3. Screening has been completed (Clause 4.1.1.2)	
4. Statement of Authorisation exists (Clause 4.1.1.6)	
5. Provisional employment has not exceeded 9 months ( Clause 4.1.1.7)	
6. Certified copies of screening document on file (Clause 4.1.1.8)	
7. Screening periods compliant with Standard (Clause 4.1.1.11)	
8. Screening completed within time frame (Clause 4.1.1.13)	
9. Screening for a shorter period, where applicable, is compliant with Standard (Clause 4.1.1.14)	
10. Permissions/work permits/authorisations, where applicable, on file (Clause 4.1.5)	
11. Interview notes on file (Clause 4.1.2.3)	
12. References, where applicable, are on file (Clause 4.1.3.1 & 4.1.3.2)	
13. Third party documents on file (Clause 4.1.3.3)	
14. Evidence of qualification or copy of licence on file (Clause 4.1.4.1)	
15. Records maintained (Clause 4.1.6.1)	
16. Screening and Acquired Companies (Clause 4.1.7.1)	
17. Terms of Employment (Clause 4.2.1 and 4.2.2)	
18. Code of conduct signed and on file (Clause 4.3.2)	
19. Training records held with Personnel File (Clause 5.6.2)	

Auditor Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **Annex F Information Note on PSA 42:2015 and Data Protection**

Clause 4.1.6.2 of PSA 42:2015 requires employers to keep employee records safe from unauthorized 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 employee's 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 – measure 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 authorized 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 to the document held if there are any inaccuracies in the information.

Further information is available from the website of the Data Protection Commissioner, [www.dataprotection.ie](http://www.dataprotection.ie).

## Annex G Pre – Audit Checklist Template

Organisation: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

PSA Licence No. \_\_\_\_\_ Auditing Body \_\_\_\_\_

I \_\_\_\_\_ of \_\_\_\_\_ hereby

(Insert Name) (Organisation)

confirm that there have been no changes to the following clauses of PSA 42:2015 in so far as they affect \_\_\_\_\_ since \_\_\_\_\_

(Organisation)

(Date)

### ORGANISATION/FINANCE

(Please ✓)

- |  |                          |
|--|--------------------------|
| 1. Clause 3.1.1 – Ownership and Management of Organisation             | <input type="checkbox"/> |
| 2. Clause 3.1.2 – Details of Directors                                 | <input type="checkbox"/> |
| 3. Clause 3.1.3 – Competence to provide security service               | <input type="checkbox"/> |
| 4. Clause 3.1.5 – Details of any bankruptcy of directors or principals | <input type="checkbox"/> |
| 5. Clause 3.1.6 – Beneficial interest in other organisations           | <input type="checkbox"/> |
| 6. Clause 3.1.8 – Beneficiary of the organisation                      | <input type="checkbox"/> |
| 7. Clause 3.1.9 – Organisation Chart attached                          | <input type="checkbox"/> |
| 8. Clause 3.2.1 – Current Tax Clearance Certificate attached           | <input type="checkbox"/> |

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Position in Organisation