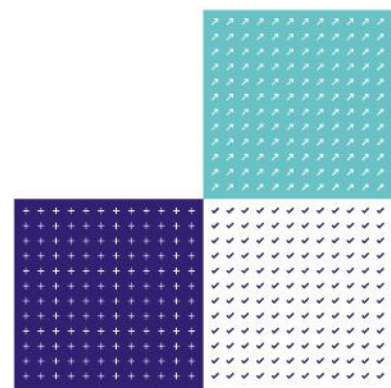


CIS 13

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Accreditation for the Certification of Security Activities incorporating the Security Industry Authority Regulator's Principles



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1. Introduction

- 1.1 This publication sets out the background to the UKAS assessment and accreditation of conformity assessment bodies (CABs) to certify to British Standard Codes of Practice in the UK private security industry, incorporating the Security Industry Authority (SIA) Regulator's Principles. It also provides guidance to CABs on the UKAS assessment approach for this activity.
- 1.2 UKAS and SIA have entered into a Memorandum of Understanding (MoU) which includes the Regulator's Principles. The Regulator's Principles are reproduced in Appendix 1 to this publication.

2. Background

The SIA is the organisation responsible for regulating the UK private security industry according to the requirements set out by the Private Security Industry Act 2001("the Act") which defines its functions as follows:

- To license individuals in specific sectors and to approve businesses
 - To keep under general review the Act and the operation of the legislative framework
 - To monitor the activities and effectiveness of those working in the private security industry
 - To conduct inspections
 - To set and approve standards of conduct, training and supervision within the industry
 - To make recommendations to improve standards
- 2.1 Security businesses within the voluntary SIA approved contractor scheme (the ACS) are required to conform with relevant security sector British Standard Codes of Practice. The SIA promotes general conformance with these Codes of Practice as part of its overall responsibility for improving standards.
- 2.2 UKAS can accredit CABs that develop their own product certification schemes based on British Standard Codes of Practice. In order for the CAB to be accredited for such schemes by UKAS, the CAB must also conform to ISO/IEC 17065.

- 2.3 One of the ways for a business to demonstrate its competence is by UKAS accredited certification to a product certification scheme incorporating the relevant security sector British Standard Codes of Practice. These security sector product certification schemes translate the recommendations and guidelines of the security sector British Standard Codes of Practice into requirements.
- 2.4 The SIA has developed a set of Regulator's Principles in relation to security sector product certification schemes. The Regulator's Principles provide a means for the Regulator to add requirements (to those in ISO/IEC17065), and to amend or reduce the requirement for any clause in existing schemes that relate to the security sector British Standard Codes of Practice.

3. UKAS Assessment

- 3.1 UKAS will assess and accredit CABs against the requirements of ISO/IEC 17065 to certify to security sector product certification schemes that incorporate the Regulator's Principles. Accreditation for this activity is voluntary.
- 3.2 Each product certification scheme operated by a CAB will be evaluated as part of the assessment process. The purpose of the evaluation is to confirm that the process undertaken for ensuring the technical robustness of the scheme was suitable and thorough resulting in a scheme which appears capable of achieving its intended outcome(s) and includes the requirements of the Regulator's Principles.
- 3.3 The UKAS assessment approach will follow that described in UKAS publication C1 - General Principles for the Assessment of Management System, Product and Persons Certification Bodies.
- 3.4 The assessment will aim to confirm that the CAB has the necessary competence to carry out effective audits against the certification scheme requirements and that systems have been implemented in accordance with ISO/IEC 17065.
- 3.5 The agreement that UKAS has with each CAB includes confidentiality requirements. However, the MoU between UKAS and the SIA requires that UKAS shares certain information with the SIA that would normally be treated as confidential, as follows:
- a) details of any application for such accreditation;
 - b) a copy of the report made by the UKAS assessment team in relation to that application;
 - c) details of any decision or conclusion reached by UKAS in relation to that application;
 - d) general observations on the performance of the organisation where specific aspects do not satisfy the requirements of the relevant standards and the Regulator's Principles;
 - e) details of any suspension, revocation or voluntary withdrawal of accreditation;
 - f) details of any contravention of an accreditation and the steps taken to correct it.
 - g) details of any complaints specifically about UKAS activities in relation to assessment to ISO/IEC 17065 and the sector specific schemes incorporating the Regulator's Principles.
- 3.6 To allow UKAS to share this information with the SIA, each CAB shall sign a Declaration and Confidentiality Waiver form. The form is available from UKAS on request.
- 3.7 The SIA shall treat all information obtained from UKAS as confidential and shall only release information so obtained to a third party if prior permission is obtained from UKAS except where there is a perceived risk to public safety or where the law requires.

4. UKAS Surveillance and Reassessment

- 4.1 Once accreditation has been granted, UKAS will assess each CAB at least annually at the CAB Head Office surveillance or reassessment visit.
- 4.2 UKAS will witness a CAB audit in each security sector accredited at least once during each 4 year accreditation cycle.

Appendix 1 The Regulator's Principles

The Regulator's Principles, v2, June 2017

The SIA recognises that conformance with relevant BS Codes of Practice is desirable in order to maintain and improve standards in the regulated private security industry.

The Regulator's Principles are a set of principles for conformity assessment bodies to apply to their product certification schemes. The Regulator's Principles provide a means for the Regulator to add requirements (to those in BS EN ISO/IEC17065), and to amend or reduce the requirement for any clause in existing schemes that relate to the security sector British Standard Codes of Practice.

The Regulator's Principles apply to conformity assessment bodies that develop sector specific product specification schemes (based on the BS Codes of Practice) and wish to be accredited by UKAS, or equivalent¹, for the purposes of providing certification to businesses as part of the Regulator's approach to improving standards.

The Regulator requires UKAS to apply the Regulator's Principles when UKAS undertakes the accreditation of a third party conformity assessment body, for the purposes of providing certification to businesses as part of the Regulator's approach to improving standards. Sector specific product specification schemes developed by a conformity assessment body should include specific reference to these Principles; and the conformity assessment body is required to adhere to them.

These Principles should be read in conjunction with the relevant BS Codes of Practice, including other documents, standards or codes of practice (e.g. BS EN 50131 *Alarm Systems*) that are referred to in a relevant BS Code of Practice, the sector specific product specification scheme, and supplement BS EN ISO/IEC 17065.

The following principles apply to sector specific product specification schemes.

Inspection and certification

Principle 1

There should be an annual inspection of the regulated business.

The nature and scope of the annual inspection may be determined by the conformity assessment body subject to the following minimum requirements:

- a. The initial inspection (Year 1) should cover all clauses of the British standard code of practice.
- b. The triennial inspection (Year 4) should cover all clauses.
- c. Each inspection should include at least one customer site visit to observe service delivery for each regulated sector.
- d. Observation of service delivery may be easier for some sectors than others and in certain cases not possible. Where circumstances render observation impracticable, the conformity assessment body should justify the alternative approach taken in its assessment documentation. Please also refer to Principle 6 and 27 for further clarification.
- e. At every inspection, the conformity assessment body must verify that the national minimum wage and national living wage is adhered to.
- f. For every inspection, the conformity assessment body must verify that identity and right to work checks are completed for relevant individuals.

¹ Where reference is made to UKAS, this includes any equivalents that are signatory to the European Co-Operation for Accreditation (EA) MLA and/or the International Accreditation Forum (IAF) to provide product certification services

Principle 2

The general approach to inspection by a conformity assessment body should be one of flexibility and pragmatism, taking due account of the size, nature, complexity and context of a business. However, the intent of every clause in a British Standard should always be met. Where the size, nature, complexity or context of a business means that a detailed requirement cannot be met then a deviation may be permitted, but this must always be fully justified and detailed in the audit report.

Principle 3

A conformity assessment body must, in the design of their scheme, determine their approach to duration of assessment and to sampling to achieve an effective assessment.

Principle 4

The conformity assessment body must provide to the Regulator on request all information relating to certification against sector specific product specification schemes. Clients of the business being certified, must be made aware.

Principle 5

The business applicant must agree to allow their chosen conformity assessment body (where applicable) to provide information relating to any relevant certification to the Regulator.

Principle 6

Except under Principle 1 (d), the sector specific product specification scheme should not allow businesses to be certified if there are no contracts in operation [to allow observation of regulated activity] at the time of their first inspection against the relevant BS Codes of Practice. Please refer to Principle 27 for further clarification.

Principle 7

Approved businesses which are already certified but do not have contracts in place at the time of their subsequent annual inspection may in some cases be allowed a time extension of no more than six weeks to the annual inspection; alternatively, the requirement to make site visits may be waived until the following year providing that the business is able to demonstrate that it has the requisite capability; this must include evidence to show that the requirements were met during the period of their last contract, that policies and processes remain fit for purpose, and that key individuals have the relevant knowledge and understanding of requirements. As a minimum, certification may only be maintained where there has been at least one site visit during the life of the certification, or in certain exceptional circumstances – see also Principle 1(d) and 27.

Principle 8

The conformity assessment body must maintain a list of those businesses that have no contracts in place at the time of inspection².

² This will allow UKAS and the Regulator to review prevalence and consider the risk that these businesses present. The Regulator wishes to avoid a situation where withdrawal of a product specification scheme certificate, resulted solely because a business cannot satisfy the requirement for an annual site visit.

Principle 9

Certain businesses may have direct contracts with customers but contract out the whole of the service/sector (e.g. because security is not their core business or until such time as they can service contracts of their own). In this instance, conformity to the BS Codes of Practice would be for 'the management of sector specific services' rather than direct service delivery.

Principle 10

Where adherence to BS7858 (Security screening of individuals employed in a security environment) is not referenced in a sector specific BS Code of Practice because security screening is covered in a different way in that Code of Practice (e.g. BS 8507-1 Close Protection), this should be reflected accordingly in that sector specific scheme. See Note 1 for details.

Principle 11

For some licensable sectors, e.g. vehicle immobilisation, there may be no sector specific British standard code of practice but BS7858 may still be used. If a conformity assessment body wishes to offer a discrete BS7858 product certification scheme recognised by the Regulator then it must incorporate the Regulator's Principles.

Principle 12

Where a business's security screening is subcontracted to a third party, that third party must be certified to BS7858 (either as a stand-alone certificate or as part of ISO9001) by a UKAS accredited conformity assessment body.

Non-conformities

Principle 13

Any suspension or withdrawal of certification must be notified by the conformity assessment body to the Regulator.

Principle 14

Any suspected non-compliance with the Private Security Industry Act 2001 (PSIA) must be notified by the conformity assessment body to the Regulator.

Principle 15

Where it is clear that an offence under the PSIA or other enactment has been committed, the conformity assessment body should treat this as a major non-conformity and consider immediate suspension or withdrawal of certification.

Principle 16

If a major non-conformity is identified during assessment by a conformity assessment body, and that does not result in immediate suspension or withdrawal of certification, the business should be allowed six weeks to put it right. The conformity assessment body must check that the non-conformity has been properly addressed within sixteen weeks.

Principle 17

Multiple minor non-conformities that together indicate an overall weakness in processes should be treated as a major non-conformity.

Principle 18

Isolated minor non-conformities should be checked at least at the next annual visit.

Transfers and sub-contracting

Principle 19

If businesses choose to transfer to a different conformity assessment body during the period of certification, a transfer of certification can only be permitted if both the transferee and transferor have the required sector scheme accreditation, which include the Regulator's Principles.

Principle 20

Where there is a transfer of certification from one UKAS accredited conformity assessment body to another, the transferee body must liaise with the transferor body to identify any complaints and/or outstanding non-conformities, opportunities for improvement and existing plans for on-going assessments.

The transferor will make relevant information available on request. The new conformity assessment body must ensure that the annual re-assessment is carried out within 12-months of the previous assessment.

Assessors

Principle 21

The Baseline Personnel Security Standard (BPSS) or the conformity assessment body's own pre-employment screening controls (provided it delivers a level of assurance equivalent to the BPSS), must be applied during the recruitment of every assessor, including sub-contract assessors (self-employed assessors). (*See Note 2 post*).

Principle 22

In the recruitment of assessors, a conformity assessment body must obtain at least the following details in respect of the prospective assessor:

- a. name and current address;
- b. National insurance number or other unique personal identifying number (where there is not an NI number);
- c. employment over the past three years including names and addresses of employers;
- d. periods of six months or more spent abroad in the past three years;
- e. relevant qualifications/licences;
- f. details of educational establishments attended, and references where someone is new to the assessment workforce;
- g. right to work in the UK where applicable; and
- h. a criminal record declaration (unspent convictions only).

Principle 23

The conformity assessment body must maintain a list of assessors that have been screened to BPSS or equivalent.

Principle 24

The conformity assessment body must demonstrate controls to ensure there is no conflict of interest for assessors involved with related schemes including the SIA's Approved Contractor Scheme.

Principle 25

Where subcontractors are used, or assessors that are either employed part time or on a zero hour contract, the conformity assessment body must have in place a proactive, documented, and regularly evaluated approach to ensure impartiality. This must include an element of testing, particularly of self-declarations by the subcontractor. (See Note 3 post.)

Principle 26

All personnel involved in the assessment process, and at least one person managing the scheme must have relevant industry competence covering both technical and audit/assessment competence. (See Note 4 post).

Exceptions to conformity

Principle 27

The following are allowed exceptions to conformity in relation to certain Codes of Practice.

Please also refer to Principle 2.

BS 7958:2015: Closed circuit television (CCTV) – Management and operation – Code of practice relevant for businesses delivering regulated CCTV activities

- a. This code of practice covers a wider remit than those activities subject to regulation under the PSIA, and may need to be applied flexibly.
- b. Where the contractor operates the scheme, but does not own the scheme, conformity may be limited to that set out in Annex C (Contractor responsibilities). A certificate of conformity may be issued 'for the [management and] operation of....CCTV'.

BS7984-1 Key holding and Response Services

- a. This code of practice covers a wider remit than may be delivered in practice. The training clause detailed in the Code of Practice should be applied flexibly according to the nature and scope of the services provided. e.g. where an operative undertaking regulated key holding activity is also trained (and competent) in line with other regulated sectors (e.g. security guarding) where sector specific Codes of Practice apply, then the specific training clause of BS7984 may be waived.

BS 7499 Static Site Guarding and Mobile patrol Service

- a. Clauses relating to the carrying of keys in vehicles (5.4.2.2), supervisor training (5.5.6), and control room construction (5.2.3) should be applied flexibly depending on the scope and nature of services being provided by the business - only where considered by the conformity assessment body to be relevant, should facilities additionally conform to BS 7958(CCTV), or BS5979 (for Alarm Receiving Centres).

- b. Clauses 5.2.1/2/3/4 relating to control room design, location, construction and facilities should be applied flexibly depending on the scope and nature of services being provided by the business.

BS 7872 Manned Security Services –Cash and valuables in transit services (collection and delivery):

- a. Application of this British Standard should be determined by reference to the Regulator's definition of regulated activities.
- b. Where a key aspect (e.g. control room function, security screening) of the security business is contracted out to a third party, that third party must be certified to the relevant [security] standard by a current UKAS conformity assessment body. The applicant business would need to be able to demonstrate this to be the case on request.

General:

Requirements must take account of relevant legislation. Current legislation takes precedence over any standards or scheme requirements.

General requirements for conformity assessment bodies

Principle 28

The conformity assessment body must maintain a register of businesses that have a valid certificate demonstrating conformity against the sector specific standards, and provide a service to the Regulator to validate a certificate on request.

Principle 29

The conformity assessment body must have an appropriate exit strategy to ensure a smooth transfer to other bodies in case it decides to withdraw from inspection of the sector specific scheme. This should include due notice to UKAS, customers and the Regulator.

Principle 30

The conformity assessment body will provide periodic reports to the Regulator as requested.

Principle 31

The conformity assessment body must demonstrate appropriate quality assurance of all recommendations from assessors; that is, recommendations to certify as well as recommendations not to certify.

Review of Regulator's Principles

Principle 32

These Principles will be subject to periodic review and amendment by Memorandum between the Regulator and UKAS. This includes but is not restricted to changes to the relevant sector specific British Standard Codes of Practice, including any new or withdrawn Codes of Practice. Sector specific schemes will similarly be reviewed and amended to reflect any changes within prescribed timeframes.

Notes

Note 1: Ref P10/11

BS7858 (Security screening of individuals employed in a security environment)

In most of the security Codes of Practice, BS7858 is referenced as a document that is indispensable for the application of that Code of Practice, and it is assumed therefore that BS7858 would be included as part of the assessment activity for a particular sector specific Code of Practice.

BS7858 should be clearly included in each sector specific product specification scheme, where it is called up in that specific Code of Practice

In some codes of practice, or in certain circumstances defined in a particular code of practice, conformance to BS7858 is not required, and therefore should not be included as part of the assessment for that sector specific product specification scheme.

Note 2: Ref P21

BPSS provides a common 'standard', an appropriate level of assurance as to the trustworthiness, integrity and probable reliability of prospective civil servants, members of the armed forces, temporary staff and government contractors generally.

See Gov.uk website for HMG Baseline Personnel Security Standard Guidance on Pre-employment screening <https://www.gov.uk/government/publications/government-baseline-personnel-security-standard>

or

Pre-employment screening good practice guide issued by CPNI:

<https://www.cpni.gov.uk/pre-employment-screening>

Note 3: Ref P25:

The conformity assessment body must take steps to explore relationships with other organisations (including consultants and training providers), or other income streams to ensure that a subcontractor is not providing training or other consultancy services to an organisation and then later undertaking an inspection against a related standard.

Note 4: Ref P26:

- a) Technical: Technical knowledge of the security industry and of the specific sectors being assessed, which must include examination, and onsite practical training **OR** practical experience within the last 3 years of applying the relevant codes of practice/sector standards within a business or as an auditor/inspector, plus an examination.
- b) Audit/assessment/inspection: IRCA approved auditor training including the 5-day course or equivalent (to lead auditor level) and relevant practical training **OR** IRCA approved auditor training (5 day course) and a minimum 3 years' experience (during the last 5 years) of inspecting against standards including those relevant to the security industry.
- c) The person managing the technical and inspection aspects of the scheme should have acquired [additional] experience to develop the knowledge and skills. This additional experience should

have been gained while acting in a similar role (as an audit team leader) under the direction and guidance of another auditor who is competent as an audit team leader.

Interpretation

Expressions commonly used in this document

BS Codes of Practice: British Standard Codes of Practice

BS EN ISO/IEC 17065: is a quality standard - Requirements for bodies certifying products, processes and services for security sector certification schemes.

Business regulation: the regulatory approach adopted by the SIA to businesses that provide security industry services under the PSIA.

Conformity Assessment Body: an independent body that provides third party assessment/audit services to businesses.

ISO9001:2015: Quality Management Systems – Requirements. This international standard can be used by internal or external parties, including certification bodies, to assess an organisation's ability to meet customer, statutory and regulatory requirements applicable to the product and the organisation's own requirements.

The Regulator: means the SIA in its role as the regulator of the Private Security Industry as defined by the Private Security Industry Act 2001.

Sector specific product specification scheme: schemes developed by conformity assessment bodies: a conformity assessment body translates a specific British standard code of practice into a compliance standard (or product specification scheme), incorporating the Regulator's Principles that can then be applied to a business and independently audited. The product specification scheme, incorporating the Regulator's Principles must be accredited by UKAS.