



An tÚdarás Slándála Príobháidí
The Private Security Authority

Public Sector Duty
Equality and Human
Rights Assessment
The Private Security
Authority

May 2024

Our Vision:

One of enhanced public confidence and consumer protections in a well regulated security industry.

Our Mission:

To protect the public by regulating the private security industry through raising standards, increasing awareness and enforcing compliance.

Private Security Authority (PSA) Equality and Human Rights Assessment – Public Sector Duty

Introduction

This Assessment is prepared in accordance with Section 42 of the Irish Human Rights and Equality Commission Act 2014. It relates to the functions and policies of the PSA and its staff. The Assessment outlines the human rights and equality issues of relevance to the functions and policies of the PSA, to identify any gaps or enhancements and actions to address these. The Assessment has been undertaken in line with guidance published by the Irish Human Rights and Equality Commission.

Under the 2014 Act, the PSA shall, in the performance of its functions, have regard to the need to:

1. eliminate discrimination;
2. promote equality of opportunity and treatment of its staff and persons to whom it provides services; and
3. protect human rights of its staff and persons to whom it provides services.

The identified groups under the Duty are:

- those covered by the nine grounds under equality legislation: gender (including gender identity), civil status, family status (including lone parents, carers), age, sexual orientation, disability, race (including nationality, skin colour, and ethnicity), religion, and membership of the Traveller community; and
- those at risk of poverty and social exclusion (socio-economic status ground).

The Duty requires a public body, having regard to its functions, purpose, size and the resources available to it, to:

1. **Assess** – set out in its strategic plan an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body;
2. **Address** – set out in its strategic plan the policies, plans and actions in place or proposed to be put in place to address those issues; and
3. **Report** – report on developments and achievements in its annual report.

Organisation

The PSA currently comprises a total of 57 staff (as of 31/12/23), consisting of staff located in our building at Davis Street in Tipperary Town, as well as seven regional inspectors based at various locations around the country. Its mission is to protect the public by regulating the private security industry through raising standards, increasing awareness and enforcing compliance.

Our core activities and strategic priorities are set out in the Authority's Strategic Plan published [here](#).

It is structured around the following work areas:

1. Corporate Affairs
2. Licensing
3. Qualifications & Standards
4. Compliance & Inspectorate

In carrying out our duties across the full range of activities, the PSA will seek to comply with all relevant equality legislation.

Assessment Template and Process

The PSA adopts a values-led approach to implementing the Duty, as such an approach offers an accessible language to support and communicate our work to implement the Duty to our staff and the wider public; and a values-led approach supports the organisation to engage and embed our core organisational values.

The PSA identifies the following five core organisational values: Partnership, Excellence, Openness, Performance, and Commitment. These values closely align with and reflect the values underpinning the goal of advancing equality and rights.

Step 1

Data gathering including contact with various Heads of Division of the Authority, overview of relevant HR policies and details of customer service complaints, approaches undertaken in other Government departments/agencies.

Step 2

Head of Corporate Affairs, following the above data gathering exercise and also utilising a survey of the security industry carried out in 2019, drafts an outline of the assessment document.

Step 3

Undertake Staff Consultation and seek input from business units on identified key services in relation to assessment of measures in place, gaps and actions required. In preparation for this exercise and to help inform the views of staff, it was made mandatory for all staff to complete the on-line training module, Equality & Human Rights in the Civil Service, through the Irish Human Rights and Equality Commission.

Step 4

Update assessment document with outcome of consultation with staff and key business units and circulate to Heads of Division for final input.

Step 5

Circulate to Board for sign off and publish.

Services to the Public

The PSA engages with a diverse client base from a variety of cultural backgrounds. Much of the work carried out by the PSA requires staff to be particularly sensitive to the types of human rights and equality issues that may be relevant to both our clients and colleagues.

Due to the diversity in the type of client which the PSA deals with, staff encounter different types of issues according to the background of the individual client on an ongoing basis requiring them to be alert to particular sensitivities on an ongoing basis.

Across all areas, there is a general need for the delivery of our services to be in a manner which promotes equality and protects human rights and this should be reflected in procedural guides throughout the PSA.

Engagement with and delivery of service to the public is a core element of the PSA's day to day activities. This assessment was undertaken to understand:

- The extent to which equality and human rights concerns impact on this work,
- The measures in place to ensure the public service duty is met,
- Potential gaps arising; and
- Actions needed to address these.

The findings of this assessment and accompanying actions are set out at the end of this document covering the following areas:

Corporate Affairs (CA) are responsible for the Department's Customer Service performance. As an agency we are committed to a customer service ethos and this is reflected in the Customer Charter available on our website [here](#). In addition, our Complaints Procedure allows the public to express their dissatisfaction with the level of service provided via a dedicated customer service mailbox and phone line.

In addition to the above areas of work, the PSA strives to ensure all authorised visitors can access the building safely and are treated with respect and courtesy at all times. Elevators and a wheelchair ramp mean the building is fully accessible.

CA also coordinate the Authority's communication and advertising campaigns and the publication of information. In doing so, a key priority is to ensure its accessibility for the industry and wider public on our website, www.psa-gov.ie. The PSA is also committed to the use of plain English in all communications.

Contractor and Individual Licensing receive correspondence and phone calls daily from members of the public. They ensure that all public correspondence is replied to in a timely manner and all citizens contacting the office are given fair and equal consideration.

Qualifications and Standards (Q&S) also receive correspondence from members of the public and similarly ensure that it is replied to in a timely manner and that all members of the public are given fair and equal consideration.

Another aspect of the work of Q&S, in drafting standards, is undertaking public consultations and engaging with the industry and wider public on a regular basis. Q&S are conscious that this work must have due regard to the Public Sector Duty to promote equality and human rights and eliminate discrimination. When undertaking public consultation or engaging with the public in these instances, the PSA must take particular care to ensure all public engagements are fully inclusive and accessible to everyone.

Compliance and Inspectorate monitors the compliance by the security industry, investigates any breach of compliance and issues the appropriate sanction up to and including prosecution in the courts.

They work closely with An Garda Síochána, industry representatives and other government agencies to ensure that individuals and companies operating within the private security industry comply with the law.

This role is undertaken by a network of Regional Inspectors located throughout the country, who ensure that compliance with our licensing legislation is enforced. The Regional Inspectors are supported by an Administration Team based in the PSA HQ Offices.

Our Inspectors are fair and objective in their investigations. They respond to all complaints inclusively and helpfully, getting balanced evidence from both sides and allowing for natural justice throughout the process.

Services to Staff

All staff of the PSA are recruited by and members of our parent Department, the Department of Justice (DoJ). In line with the entire Civil Service, the PSA is strongly committed to equality of opportunity in all of its employment practices. Under the Employment Equality Acts, staff can be confident that their statutory rights are guaranteed and that no one will receive less favourable treatment because of gender, civil or family status, age, sexual orientation, disability, race, religion or membership of the Traveller community.

In applying the Public Sector Duty, the PSA, in conjunction with the DoJ, will protect the human rights of and promote the equality of opportunity and treatment of its staff in all instances, including in relation to access to accommodation, IT systems and equipment including assistive technologies, learning and development, internal and external mobility opportunities, undertaking recruitment practices and overseeing systems of performance management.

All staff have a duty to behave in an acceptable and respectful manner towards one another and the PSA's Dignity at Work policy seeks to promote respect, dignity, safety and equality in

the workplace. This seeks to ensure a positive and healthy workplace where all forms of bullying, harassment and sexual harassment are not tolerated in any form.

The PSA has a dedicated Access Officer, who in conjunction with the DoJ, promotes and supports the employment of persons with disabilities in the PSA. The PSA also participates in AHEAD's Willing, Able Mentoring (WAM) programme to provide work experience and opportunities for graduates with disabilities.

The PSA has a well-established Wellbeing Programme of events and information sessions that aims to promote good health and counter the causes of stress and ill-health. All staff are encouraged to participate in the Wellbeing Programme and put forward suggestions for future events.

The PSA, in conjunction with the DoJ, is committed to protecting the rights and privacy of individuals, including the personal data of staff, in accordance with the Data Protection Acts and the EU General Data Protection Regulation.

The PSA's commitment to the Public Sector Duty and relevant actions will be set out in the next Strategic Plan, alongside a strong commitment to Equality, Diversity and Inclusion as a key strand of work with associated actions. The PSA delivered additional supports to managers and staff during extended periods of remote working due to COVID-19 restrictions. The PSA recognises that equality aspects will need to be considered as part of any future arrangements for remote working.

Having assessed the extent to which equality and human rights concerns impact on the services we provide to staff, this document contains a number of corresponding actions which aim to increase awareness, remove unconscious bias and ensure best practice is embedded throughout the work of HR management.

Evidence Base for this Assessment

This evidence-based assessment of equality and human rights issues is based on data and information from:

- the Irish Human Rights and Equality Commission;
- internal PSA data and records, particularly customer service data and records of complaints;
- a survey of the security industry carried out in 2022 to assess and identify any human rights and equality issues within the industry.

The equality and human rights issues identified below arise out of the data and information gathered from the aforementioned sources. For the purposes of this assessment, we are relying largely on the survey of the industry carried out in 2022, as well as the views and opinions collated within the organisation.

The equality and human rights issues identified below are relevant to each of the functions of the PSA, unless otherwise stated.

Assessment of issues identified in 2022 Survey of Security Industry

The security industry is male dominated and the PSA has included in its current strategic plan the need to identify the barriers to female participation in the industry.

Persons in the industry have experienced negative comments or abusive behaviour to varying degrees relating to their own or someone else's:

- age
- religion
- disability
- sex
- sexuality
- nationality
- economic background
- gender identity
- pregnancy/maternity
- race/ethnicity

Discrimination on the grounds of Nationality, Age and Race/Ethnicity were the three most common areas identified in the survey.

Of those surveyed, over 86% stated that they had experienced discrimination more than once, with the customer being the largest cohort in terms of the source of the comments/behaviour.

12% stated that discrimination had a serious or very serious impact on their lives.

Human Rights and Equality issues under consideration by the PSA

- Discrimination and less favourable treatment, both individual and systemic
- Harassment and sexual harassment, bullying and abusive treatment
- False assumptions, prejudice, bias, and stereotyping, in the workplace, in service provision and in the public domain, across all grounds
- Violence, hate crime and hate speech
- Unwelcoming environments in work, service provision and in the exercise of public functions
- Lack of effective redress for incidents of discrimination, harassment, sexual harassment, bullying, and abusive behaviour
- Risk of inadequate consultation
- Risk of inadequate representation
- Risk of inadequate engagement
- Possible barriers to participation in decision-making and consultation processes
- Risk of lack of autonomy in making one's own decisions
- Digital inequality and exclusion
- Access barriers in the labour force
- Progress barriers in the workplace
- Failure to adapt for and to be flexible in taking account of the practical implications of diversity and the specific needs that arise.

Enabling Implementation

Leadership

Leadership is a key element for the effective implementation of the Duty. This leadership will come from the Board, the CEO and the Senior Management Team.

The CEO will report to the Board on a regular basis on the progress made in implementing the Duty and in addressing the equality and human rights issues relevant to our functions.

Communication

We will build staff familiarisation with the Duty and our ambitions for the Duty.

We will keep staff up-to-date on our implementation of the Duty and the progress made on foot of this.

We will embed the Public Sector Equality & Human Rights Duty within our organisational culture.

Capacity

We will provide training on the Duty, in particular all staff will be required to complete the IHREC on-line training module on the Duty.

We will include a focus on the duty and our ambitions for the Duty in all induction training for new staff.

Implementation

The 'Address' step of the Duty, which includes the development and review of our plans, initiatives, and policies, will be implemented through specific actions as follows:

Key moments of focus for implementing the 'Address' step of the Duty are the development or review of:

- Business Plans
- Strategic Plan
- Internal policies and procedures
- Submissions made by the PSA, such as those to the DoJ and other Government departments and agencies.

Specific Actions 2023

The Executive initiated the following actions as part of its implementation of the Duty in 2023:

Action	Status
Completion of the Irish Human Rights and Equality Commission Public Duty One Learning Course by staff	Completed for all current staff but ongoing as part of induction for new staff.
Anti-human trafficking training, through Mecpaths, made mandatory for certain sectors in the security industry.	Completed – this training was launched in October 2023 and is now mandatory for first time applicants in the Door Supervisor, Event Security and Security Guarding sectors.
Equality and human rights issues considered in drafting of Strategic Plan.	Completed – new Strategic Plan, covering the period 2023-2025 was launched.

Reporting

The PSA's next Strategic Plan will set out the assessment undertaken with actions identified for follow up. Monitoring of progress and continued compliance will be included in the PSA's Corporate Governance Framework and Annual Reporting process. The Public Sector Duty Group will meet at regular intervals to review progress on actions.