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Private Security Operation – PSO 01

Purpose: To define the compliance of ISO 18788:2015 Private Security Operations management system requirement in the organization.

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4.0 Context of the organization

4.1 Understanding the organization and its context

4.1.1 General

The design and implementation of a management system framework is based on an understanding of the organization and its internal and external context of operation. Therefore, the organization has defined and documented its internal and external context, including its supply chain and subcontractors. These factors have been taken into account when establishing, implementing and maintaining the organization's SOMS, and assigning priorities.

The organization periodically evaluates the internal and external factors that can influence the way in which the organization will manage risk.

4.1.2 Internal Context (Issues)

Considering our intention of implementing the SOMS, we have listed our internal issues as below:

- Objectives, strategies and business mission of the organization;
- Policies, plans and guidelines to achieve objectives;
- Organization's governance, roles and responsibilities, and accountabilities;
- Overall risk management strategy;
- Internal stakeholders;
- Values, ethos and culture;
- Information flow and decision-making processes;
- Capabilities, resources and assets;
- Procedures, processes and practices;
- Activities, functions, services and products;
- Brand and reputation of the organization.

4.1.3 External Context (Issues)

Considering our intention of implementing the SOMS, we have listed our external issues as below:

- The cultural and political context;
- Legal, regulatory, technological, economic, natural and competitive environment;
- Contractual agreements, including other organizations within the contract scope;
- Infrastructure dependencies and operational interdependencies;
- Supply chain and contractor relationships and commitments;

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Procedure for Use of Force

1.0 Purpose

This procedure establishes guidelines and standards applicable to the use of force by personnel of [Company Name] The purpose is to describe the procedures, requirements, and expectations surrounding the use of force by [Company Name]

2.0 Scope and Policy

This procedure is applicable to all the security operations, processes and activities of the organization, carried out by any person on the behalf of PSI at any locations.

Personnel shall make every effort to preserve the sanctity of human life in all situations. PSI shall hold personnel accountable for upholding lawful, professional, and ethical standards through assertive leadership and supervision before, during, and after every use of force incident. Personnel who use force shall use the minimum amount of force that is reasonable, necessary, and proportional based on the totality of the circumstances confronting the personnel in order to bring about a lawful objective. Once force is used, personnel shall reduce the level of force or stop using force as the resistance or threat decreases.

Personnel derive their authority to use force from the state laws, PSI policies, and the community. Unreasonable force degrades the legitimacy of the personnel's authority. The unreasonable use of force will subject personnel to discipline, as well as to possible criminal prosecution and/or civil liability. Personnel will be held accountable by the PSI when utilizing force that does not conform to this policy or training conducted by the PSI. Personnel shall clearly articulate the facts demonstrating that they used the minimum amount of force that was reasonable, necessary, and proportional based on the totality of the circumstances confronting the personnel in order to bring about a lawful objective.

3.0 Responsibility

3.1 Top Management, Security Operation Coordinator and all security personnel are responsible for follow-up of use of force procedure in their area of work.

4.0 Use of Force Requirements

A. General Requirements

- Personnel shall first use de-escalation techniques when feasible to gain the voluntary compliance of an individual to reduce or eliminate the need to use force.
- Among these techniques are the use of advisements, warnings, and verbal persuasion.
- When feasible, personnel shall allow an individual a reasonable amount of time to submit to apprehend or a lawful order before using force.
- Personnel shall continually assess whether the use of force is necessary and when continued force applications are no longer necessary to accomplish a lawful objective. Personnel shall reduce the level of force applied as the nature of the threat diminishes to include stopping the use of force.

B. Reasonable Force

- Force is reasonable when it is the minimum amount of force necessary to protect client or security personnel or other individual under the circumstances.

C. Necessary Force

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- Force is necessary when no reasonable alternative to the use of force exists. When force is necessary, personnel shall use the minimum amount of force required that is reasonable.

D. Proportional Force

- Force is proportional when it includes consideration of the totality of the circumstances surrounding the situation, including the presence of articulable imminent danger to the personnel or others.
- The use of proportional force by personnel does not require the use of the same type or amount of force as that used by the individual.

E. Totality of the Circumstances

- When force is used, the decision to use force and the level of force must be reasonable, necessary, and proportional given the totality of the circumstances.
- Factors defining the totality of the circumstances include, but are not limited to the following:
 - ✓ The severity of the crime(s) at issue;
 - ✓ Whether the individual is actively resisting apprehend or attempting to evade apprehend by flight; and
 - ✓ Whether the individual poses an immediate threat to the safety of the personnel(s) or others.
- Other factors may include the following:
 - ✓ The knowledge or belief the individual is under the influence of alcohol and/or drugs.
 - ✓ The individual's medical or mental health history or condition as known to the personnel at the time.
 - ✓ The individual's known history to include violent tendencies and/or previous combative encounters with law enforcement.
 - ✓ Disparities of force (i.e., differences in factors such as physical size, numbers, gender, age, weapons, injury, special knowledge or skills that place an personnel at an advantage (positive disparity) or disadvantage (negative disparity), are part of the "totality of the circumstances," and can have direct implications on the reasonableness of a use of force. The existence of a negative disparity for the personnel could justify the use of a higher level of force in a given situation whereas a positive disparity for the personnel could reduce the level of force deemed reasonable in a given situation.
 - ✓ The individual's condition, if known (e.g., it is apparent to the personnel that an individual is in crisis), must be considered in the personnel's approach to the situation.
 - ✓ The opportunities the personnel had to give a warning, use verbal de-escalation, and use other de-escalation techniques or tactics to limit the amount of force used.
 - ✓ Whether the personnel made statement(s) or took action(s) that created the need to use force.
- The dynamics of a use of force encounter can quickly change which may cause the personnel to reasonably escalate or de-escalate the level of force they are using against an individual.
- All factors surrounding a use of force encounter must be clearly, concisely, and correctly documented.

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Procedure for Selection, Background Screening and Vetting of Personnel

1.0 Purpose

This procedure describes the method and means of selection, background screening and vetting of personnel to implement and maintain the security operations management system.

2.0 Scope

This procedure covers employment screening and vetting, background checks and security clearance procedures for the personnel, including new recruits of the organization.

3.0 Responsibility

3.1 **Top Management, Security Operation Coordinator and Functional Heads** are responsible for review of records of selection, background screening and vetting of personnel.

4.0 Description of Activity

4.1 Grievance Procedures & Reporting

A robust employee screening program helps to minimize the risk of making inappropriate recruitment decisions, which if unchecked, could lead to fraud, dishonesty or misconduct and cause damage to the organization's brand, reputation and financial standing.

Our core employment screening checks comprise of the following components:

- **Identity Check**

Verification of a person's identifying credentials/identity documents such as Passport or Birth Certificate helps ensure that they are who they say they are.

- **Right to Work**

Where a non-Indian citizen presents a work or student visa, PSI will validate its authenticity using Home Office sources.

- **Proof of Residence Verification**

Confirming a person's residential address commences with a search of the public electoral roll. Where an individual is not found, PSI will utilize other data sources, such consumer credit 'footprint' data to prove a transactional history of a person at a specific address.

- **Credit Check**

A consumer credit check will be carried out using an established credit bureau (such as CIBIL). Such a check helps identify bankruptcy, financial fraud etc.

- **Academic Qualification Validation**

A direct request would be made to the school, college or university to confirm the individual's qualifications and/or period of attendance.

- **Professional Qualification and Membership Check**

A direct request would be made to the professional body, requesting confirmation of the individual's date of joining, membership status and professional qualifications.

- **Criminal Record Search**

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Human Rights Policy

- [Company Name] (the "Company") is committed to the recognition, respect and promotion of human rights wherever we conduct our operations and is dedicated to maintaining a working environment where human rights are understood and respected.
- The Company adheres to international law on the protection of human rights, as well as the Country-India Guiding Principles on Business and Human Rights and International Code of Conduct Association (ICoCA) Code, even if national or Flag State law does not specify them.
- The Company will exercise due diligence to ensure compliance with the Law and the principles contained in the ICoCA Code and we will respect the human rights of all persons we come into contact with, including, the rights to freedom of expression, association, and peaceful assembly and against arbitrary or unlawful interference with privacy or deprivation of property.
- The Company will engage with affected stakeholders and their representatives in the development of its human rights approach, identifying and addressing potential impacts our operations have on people involved, including vulnerable groups, remediating any proven adverse impacts on individuals and maintaining grievance mechanisms to record and address human rights allegations and incidents, while protecting the confidentiality of anyone who reports potential violations.
- The Company shall not preclude access to judicial or other non-judicial grievance mechanisms and shall always cooperate with all human rights-related investigations.
- All Company personnel, partners and contractors shall treat everyone respectfully, protect human dignity and maintain and uphold human rights of all persons, prohibiting harassment and discrimination in all aspects of Company's activities.
- Security guards may use force only when strictly necessary as the last resort and only to the extent required for their self-defense and this of the people they protect during the performance of their duty, always in accordance with [Company Name] SOP, RUF and Code of Conduct and Ethics.
- No security guard or any Company personnel may inflict, instigate or tolerate any act of torture or other cruel, inhuman degrading treatment or punishment.
- Security guards should apply as much as possible non-violent means before resorting to the use of force and firearms and should follow the standards and procedures set out for the rules and regulations for the use of force and firearms.
- In cases where force is used, such incidents should be properly reported to the appropriate authorities and to the company, as soon as it is safe to do so. [Company Name] also aspires to conform to the legal duty to rescue any persons, including suspected pirates / assailants, who no longer pose a threat and may be at risk of drowning or worsening of injuries. Medical aid should be provided to injured persons, including to the offenders.
- The Company provides effective training for all personnel in national

Security Incident Report		F/PSO/07 Rev No.00
Information on Person in Charge of the Group		
Name:		
Address:		
Person Details:	Home Phone Number:	Work Phone Number:
	Fax:	E-mail:
Information on The Incident		
Nature of Activity:		
Place of Activity:		
Date of the Incident		Time of the Incident:
Exact Location of the Incident:		
Weather Condition (If Applicable):		
Name of the Leader in charge at that time:		
Description of Incident :		
Witness Name:	Home Phone:	Work Phone:
Witness Name:	Home Phone:	Work Phone:
Complete only if This Incident was Reported to the Place		
Police Station Name & Number:		
Police Station Address		

Personnel Screening Form		F/PSO/01 Rev No.00	
Punyam Security INC Address:4,Abhishree Corporate park, Near Iskon-Ambali Road, Iskon, Ahmedabad, Gujarat, India		Application Form Confidential (When Complete) (For Data Protection Purpose, This Application Form Will be shredded after one year, If Your Application was Unsuccessful)	
Notes: - Please used Blank ink and Capital Letters - Please Answer All questions (Use N/A,No or None if A Questions Does not apply) - Please Read All sections carefully and sign where applicable			
For Office use Only			
Name:		ID:	
Start Date		Screening Date	
Probation Date		License No.	
Expiry of License Date		License Type	
Training Notes			
Document Seen			
Passport ☐	Passport / Visa Type Exp:		
Proof Of Address			
Driving License			
Birth Certificate			
Additional Screening Requirements			
Letter Issued			
Company Information			
Date of Transfer		Previous Company	
Continuous Service		Site name	
Paper Work Forward To	Accounts ☐	Screening ☐	Control ☐
Leaves Inform	Uniform Required; Yes ☐ No ☐	Department Informed Accounts ☐ Operations ☐ Control ☐	
Leaving Date	Re Employee :Y/N	Signed:	

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The International Code of Conduct for Private Security Service Providers (ICoC)	
• The International Code of Conduct for Private Security Service Providers (ICoC) is aimed directly at private security companies. Its members 'commit to the responsible provision of Security Services so as to support the rule of law, respect the human rights/humanitarian law, and protect the interests of their clients.' The ICoC applies primarily to security services delivered in complex environments. Nevertheless, the standards and recommendations are also valid in other contexts. • The International Code of Conduct Association (ICoCA), is a multi-stakeholder initiative consisting of three pillars representing states, private security companies (PSCs) and civil society organizations (CSOs). All members (i.e. States, private security companies and civil society organizations) participate in the ICoC A General Assembly and have equal representation on the Board of Directors - the executive decision-making body of the Association, which comprises 12 elected members. • The Association aims to promote, direct and supervise the implementation of the International Code of Conduct for Private Security Service Providers through: ➤ The certification of member companies to ICoC standards; ➤ The review of company self-assessments and the monitoring and evaluation of member private security company compliance with the ICoC; and ➤ The processing of complaints about alleged violations of the ICoC by member private security companies.	
Date:01-03-2020	Approved By (Director)

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F. Lawful Objective

- Personnel shall only use force to achieve a lawful objective. Personnel are authorized to use force:
 - ✓ To effect a lawful detention of a person;
 - ✓ To prevent and/or terminate the commission of a crime;
 - ✓ To intervene in a suicide or self-inflicted injury;
 - ✓ To defend a personnel or other individual from the physical acts of another; or
 - ✓ To conduct a lawful search when an individual is actively resisting.

G. Use of Force Prohibitions

- Personnel shall not use force to attempt to gain compliance with an unlawful command.
- Personnel shall not engage in actions or tactics or make statements that escalate a situation such that the use of force becomes necessary.
- Personnel shall not use force against a restrained or handcuffed individual unless the force is necessary:
 - ✓ To prevent imminent bodily harm to the personnel or another person or persons;
 - ✓ To overcome active resistance; or
 - ✓ To move an individual who is passively resisting.
- Personnel shall not use deadly force against any individual who is threatening suicide or self-injury when that individual is not posing a threat to anyone else.
- Personnel shall not use neck holds unless deadly force is justified.
- Personnel shall not fire warning shots.
- Personnel shall not fire less-lethal or a lethal munition at an individual in a crowded environment if, based upon the totality of the circumstances, the danger of hitting an innocent bystander outweighs the necessity and likelihood of stopping the individual.
- Personnel are prohibited from using deadly force solely in defense or protection of property.

H. Use of Force Procedures

A. General Procedures

- When feasible, personnel shall identify themselves as peace personnel and announce their intent to apprehend or search an individual before using force.
- Personnel shall recognize and utilize distance, cover, concealment, or intermediate barriers in order to maximize their reaction time and deployment of resources.
- When feasible, and when doing so would not increase the danger to personnel or others, personnel shall issue a verbal warning to the individual prior to using force.
- Personnel shall take reasonable steps under the circumstances, before and during any use of force, to avoid unnecessary risk to bystanders, victims, hostages, and other involved civilians, as well as other personnel and emergency personnel.
- In situations when the individual is forced into a face down position, personnel shall release pressure/weight from the individual and position the individual on their side or sit them up as soon as they are restrained and it is safe to do so. Personnel shall monitor the individual for any breathing problems or any other signs of distress.