

Working Together to Protect Crowded Places

March 2010



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Ministerial foreword

Admiral the Lord West of Spithead

Parliamentary Under-Secretary of State, Home Office



The UK faces a threat from international terrorism of a nature and magnitude different to any we have encountered before.

The aim of the Government's counter-terrorist strategy, CONTEST, is to reduce the risk of international terrorism to the UK and its interests overseas so that people can go about their daily lives freely and with confidence.

As part of that strategy we need to develop our protective security to make it harder for terrorists to attack targets in this country. In July 2007, the Prime Minister asked me to specifically consider how best to protect crowded places from terrorist attack. The results of the review were announced by the Prime Minister in November 2007 and led to two draft papers which we put out for consultation in April 2009.

This paper incorporates feedback from that consultation and sets out clearly the Government's strategy on the protection of crowded places. It should be read in conjunction with two more detailed brochures: *Crowded Places: The Planning System and Counter-Terrorism*; and *Protecting Crowded Places: Design and Technical Issues*.

West of Spithead

ADMIRAL the LORD WEST of SPITHEAD,
GCB, DSC, DUniv



Executive summary

Crowded places remain an attractive target for international terrorists. Putting in place better counter-terrorism protective security reduces both the likelihood and the impact of a terrorist attack. This guidance describes the key principles that inform our work to improve the protective security of crowded places, the contributions that a wide range of partners can make and how vulnerabilities can best be reduced.

Chapter 1: Key principles

Our counter-terrorism strategy has four main areas of work. One of these is *Protect*, the purpose of which is to strengthen our overall protection against a terrorist attack. Counter-terrorism protective security measures for crowded places must be proportionate to risk, reducing vulnerability but allowing individuals and businesses to go about their daily lives freely and with confidence.

Good local partnerships are vital to successfully delivering protective security. Funding requirements fall to those who benefit, under the long-standing “user pays” principle.

A national and local performance framework is in place to track the progress of this programme.

Chapter 2: Roles and responsibilities

At a national level, the crowded places programme will be delivered through the Home Office, Government Offices, Devolved Administrations and the police National Counter-Terrorism Security Office (NaCTSO).

There are a number of options for identifying the lead local partnership to own the programme of work at the local level. This chapter provides details. Options include Crime and Disorder

Reduction Partnerships and the Resilience Network.

Local authority chief executives and police Basic Command Units (BCU) heads will have a key leadership role and local businesses also have key contributions to make.

Chapter 3: Reducing the vulnerability of crowded places

Police Counter-Terrorism Security Advisers (CTSAs) are already assessing the relative risks of crowded places to terrorist attack and making recommendations for protective security improvements to address identified vulnerabilities. This process will continue. A Vulnerability Self-Assessment Tool will also be available.

The purpose of risk assessments is to enable local partnerships to prioritise their work and over time to assess progress. The results of risk assessments are not published but, subject to safeguards, must be shared with those who have contributions to make.

In those places where the risk assessment has shown a crowded place to be at highest relative risk of terrorist attack, the lead local partnership should draw up an action plan to address the identified vulnerabilities.

Chapter 4: Reducing vulnerabilities: what works?

There are numerous examples of good practice for counter-terrorism protective security. Some are listed here with references to other sources of further information.

This brochure has been produced by the Office for Security and Counter-Terrorism in the Home Office, with other agencies and Departments.



1.01 The UK faces a significant threat from international terrorism. In March 2009, the Government published an updated counter-terrorist strategy, known as CONTEST¹, to take account of the evolving threat, the lessons that have been learned and the new challenges that we face. The aim of the strategy is to reduce the risk to the UK and its interests overseas from international terrorism so that people can go about their daily lives freely and with confidence. The strategy has four main workstreams each with a clear objective:

- *Pursue* – to stop terrorist attacks;
- *Prevent* – to stop people becoming terrorists or supporting violent extremists;
- *Protect* – to strengthen our overall protection against terrorist attacks; and
- *Prepare* – where we cannot stop an attack, to mitigate its impact.

1.02 Crowded places are locations frequented by the public, which are judged to be possible terrorist targets by virtue of their crowd density. On 25 July 2007 the Prime Minister asked Lord West, Home Office Parliamentary Under-Secretary of State for Security and Counter-Terrorism, to review how best to protect crowded places (and transport infrastructure and critical national infrastructure) from terrorist attack.

1.03 The results of the review, which were announced by the Prime Minister in Parliament on 14 November 2007 (with further detail given in the Home Secretary's Written Ministerial Statement on the same date²) showed that a substantial amount of work had been undertaken or was underway to increase levels of protective security, but that more was needed to turn available advice into action on the ground. The review highlighted the importance of engaging with a wide range of local

partners, in particular with local authorities and local businesses, to implement counter-terrorism protective security measures.

Following the review, the Government conducted a public consultation exercise on proposals regarding crowded places³. This was launched on 20 April 2009 and closed on 10 July 2009.

1.04 This guidance has been revised to reflect the comments received. It aims to help local authorities, the police, members of Crime and Disorder Reduction Partnerships and Local Resilience Forums, Community Safety Partnerships in Wales, Strategic Coordinating Groups in Scotland, as well as other local partners, including businesses, understand their role and the contributions they can make to reducing the vulnerability of crowded places to terrorist attack. In particular, it explains:

- how risk will be assessed and local performance managed; and
- the roles of key partners in helping to reduce the vulnerability of crowded places to terrorist attack.

1.05 The guidance reflects the following principles:

- work should be prioritised on the basis of an assessment of risk and informed by the latest assessments of the terrorist threat;
- in accordance with the aim of CONTEST itself, protection should be proportionate to risk and as far as possible enable individuals and businesses to carry on with their daily lives freely and with confidence;

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- nationally, the Office for Security and Counter-Terrorism (OSCT) in the Home Office will lead the overall work programme; Government Departments will own and address the risks in the sectors for which they are responsible;
- locally, protective security work must be steered through a partnership involving local authorities, business and others; and
- the body that is nominated as the lead local partnership will be responsible for managing the overall risk at the local level. Owners/operators of crowded places will be responsible for considering implementing actions to mitigate vulnerabilities identified by police Counter-Terrorism Security Advisers (CTSAs).

Funding

1.06 The provision of counter-terrorism protective security measures has long been based upon the principle that the “user pays” and that funding for new protective security measures falls where the responsibility for those measures lies. This principle has been applied across the Critical National Infrastructure so that the public only pay to protect the services they use. For example, the gas consumer pays for protection at some key gas sites. Other examples include transport and football. Lord West’s Review recommended that this principle should continue.

1.07 However, the Government has recognised the need to increase the capacity of Counter-Terrorism Security Advisers (CTSAs) so that counter-terrorism protective security advice is more readily available at a local level. From 2008-09, the Government is providing more than £1.5 million a year to support the recruitment of an extra 70 CTSAs in England and Wales. In Scotland, Scottish Ministers have agreed to fund an additional 7.5 CTSA posts from 2008-09. There are currently two CTSAs in Northern Ireland. There are now more than 250 CTSAs around the UK.

1.08 The Government allocated over £9

million in 2009-10 to support the local delivery of this work in England and Wales. In addition the Government invested an additional £2.7 million in 2007-08 and 2008-09 to increase the size of the National Barrier Asset (this is a resource available for use throughout the UK where barriers are an appropriate but temporary response to an event carrying significant risk).

Monitoring and evaluating progress

1.09 To underline the importance of counter-terrorism work, the Government in 2007 created a new cross-Government Public Service Agreement (PSA) for counter-terrorism (PSA 26) which aims ‘to reduce the risk to the UK and its interests overseas from international terrorism’.

1.10 Whilst this PSA itself is not published, one of the objectives that the Government has set in it is to strengthen our overall protection against terrorist attack. Reducing the vulnerability of crowded places to terrorist attack will be one of the key elements in the PSA showing the extent to which the objective has been met. A summary of the PSA and details of its aims and outcomes can be found in Annex A of CONTEST⁴.

1.11 Performance on crowded places work will be managed by OSCT working with and through Government Offices, the Northern Ireland Office (NIO) and the devolved administrations in Scotland and Wales.

1.12 A new local performance framework for England was introduced from April 2008. Through Local Area Agreements (LAAs) the framework reflects priorities set by Government and those of local authorities and their partners: an LAA includes up to 35 National Indicators (NIs) from a National Indicator Set which describes key central Government priorities.

1.13 Improvements to reduce the vulnerability of crowded places to terrorist attack can only be delivered by local partnerships. The Government has included an indicator on ‘Protection against terrorist attack’ (NI 36) in the Single Set of National Indicators for Local Authorities and

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Local Authority Partnerships, published on 11 October 2007. Because of the sensitivity of the information, NI 36 data will not be published. The same indicator is also included in the Assessments of Policing and Community Safety (APACS) framework. These indicators are not published but are used by police, partner agencies and the Government to evaluate and assess the performance of counter-terrorism policing.

1.14 Local areas will have considered NI 36 as part of their LAA negotiations and some will have negotiated and agreed improvement targets against NI 36. These targets will be performance managed in accordance with the arrangements for LAAs, which are set out in the Department for Communities and Local Government (CLG) publications⁵.

Scope

1.15 This document does not apply to buildings in the transport sector. However, there will be occasions where crowded places (shopping centres, sports stadia, etc) are integrated with either a transport building or hub. Transport Security Directorate (TRANSEC) in the Department for Transport can offer advice about specific requirements that apply to transport buildings⁶.

1.16 This document is only aimed at the higher and further education elements of the education sector and does not apply to schools. It is important that schools take reasonable measures to keep pupils safe from threats to their well-being, and schools already assess risks and incorporate effective but proportionate protective security measures. Schools are generally controlled environments, unlike universities and colleges where any member of the public can gain access to the campus. Schools would address potential counter-terrorism issues within their broader security and emergency planning work rather than as a discrete issue.

1.17 The working definition of “crowded places” used in this framework document is widely drawn: crowded places comprise the following sectors:

- bars, pubs and night clubs;
- restaurants and hotels;
- shopping centres;
- sports and entertainment stadia;
- cinemas and theatres;
- visitor attractions;
- major events;
- commercial centres;
- health sector;
- education sector; and
- religious sites/places of worship.



Chapter 2 Roles and responsibilities

2.01 The vulnerability of crowded places to terrorist attack can only be reduced through coordinated work by a range of organisations within a common strategic framework. This chapter sets out the roles and responsibilities of relevant national and local organisations.

Central government

2.02 Central government, led by the Office for Security and Counter-Terrorism (OSCT) in the Home Office, leads the national programme for reducing the vulnerability of crowded places drawing on the expertise of other Government Departments (see below) and the police. OSCT is also responsible for ensuring consistency between this programme and others in CONTEST. OSCT will put in place performance management frameworks.

2.03 Within the governance of CONTEST, the *Protect* workstream Board has responsibility for the working level management of this programme, reporting to the CONTEST Board and through that Board to the Home Secretary.

2.04 Central government is also responsible for developing science and technology responses to some of the protective security challenges identified in this document. In August 2009 the Government published the UK's Science and Technology Strategy for Countering International Terrorism, and the first of a projected series of Science and Technology brochures, entitled '*Ideas and Innovation*'. These documents identify crowded places as a key security challenge to which science and technology may identify solutions and outline our approach to tackling it through, for example, a cross-government INSTINCT (Innovative Science and Technology in Counter-Terrorism) programme⁷. INSTINCT focussed much of its attention on crowded places during 2009.

Devolved administrations

2.05 The CONTEST Scotland Board has ownership of the crowded places workstream at the national level in Scotland. Work on assessing and reducing the vulnerability of sites is already under way at a local level. Central support will be available from police and Scottish Government involving, where necessary, the relevant Strategic Coordinating Group (regional groups involving police, fire, local authority and other local representation) or a suitable sub-group of it.

2.06 In Wales, a Board to coordinate implementation of CONTEST has been established with senior representation from the Welsh Assembly Government, the Welsh Association of Chief Police Officers, the Welsh Extremism and Counter-Terrorism Unit, the Home Office, the Welsh Local Government Association and others. The Board is engaging with local partners and will be monitoring developments in local areas.

2.07 In Northern Ireland, the Northern Ireland Office (NIO) chairs a local CONTEST group comprising the NIO, the Police Service of Northern Ireland (PSNI) and the Centre for the Protection of National Infrastructure (CPNI). The Group looks at CONTEST as a whole and, in particular, at the delivery of the eight objectives within the *Protect* programme. A working group has been established to concentrate on crowded places, including the development of appropriate delivery structures and local partnership arrangements, given the differences in the framework and responsibilities of local government and other statutory agencies in Northern Ireland.

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Government offices

2.08 Government Offices will work with local authorities and other statutory agencies to reduce the vulnerability of crowded places to terrorist attack. Specifically, Government Offices in England will be responsible for:

- negotiating and ensuring local arrangements are in place for the delivery of the crowded places programme. These arrangements may include Crime and Disorder Reduction Partnerships (CDRPs) or Local Resilience Forums (LRFs). Further details are given below;
- working with local stakeholders and others to identify and share good practice;
- negotiating and agreeing Local Area Agreements (LAAs); and
- continuously managing Government relations with each local area and renegotiating LAA improvement targets.

National Counter-Terrorism Security Office and Counter-Terrorism Security Advisers

2.09 The National Counter-Terrorism Security Office (NaCTSO) is a police unit responsible for raising awareness of the terrorist threat and for encouraging the implementation of protective security measures to reduce the risk and impact of a terrorist attack. NaCTSO coordinates, trains and tasks a network of local police Counter-Terrorism Security Advisers (CTSAs) throughout the UK whose role is to provide specialist advice about protective security measures to local organisations, both private and public sector. NaCTSO quality-assures and peer reviews the work of the CTSAs.

2.10 It is the responsibility of the CTSAs to undertake risk assessments of crowded places, using the guidance referred to in Chapter 3 and Annex A below. CTSAs are the local physical security experts who will

undertake crowded places risk assessments and site surveys. In police force areas, they will advise counter-terrorism operational leads and Basic Command Unit (BCU) heads to develop effective local action plans with local partners. There are now more than 250 CTSAs around the UK.

2.11 NaCTSO produces and distributes comprehensive guidance on counter-terrorism protective security for specific sectors, including bars, pubs and clubs, shopping centres, sports stadia, visitor attractions, cinemas and theatres, restaurants and hotels, the higher and further education sector, health sector, commercial centres, major events, and religious sites/places of worship⁸. NaCTSO will act as a central point of contact for significant development projects which are dealt with by businesses' head offices to ensure provision of appropriate counter-terrorism protective security advice. In addition, NaCTSO offer to provide training for relevant personnel in business head offices involved in major development work so as to raise their awareness of relevant issues.

2.12 NaCTSO has also developed a scenario-based training exercise, Project Argus, aimed at high street businesses and delivered by local police CTSAs, supported by an expert panel comprising representation from the local police, fire and rescue services and the local authority emergency planning department. The local neighbourhood policing team also attends the events. These aim to provide businesses with counter-terrorism advice on protective security by taking businesses through a simulated terrorist attack⁹.

2.13 NaCTSO has developed one variant of Project Argus for night-time economy businesses and another for planners, architects and property developers. These aim to demonstrate the importance of designing-in counter-terrorism protective security measures: more details can be found in Chapter 4 of this guidance.

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Local authorities in England

2.14 Local authorities have an important part to play in the protection of crowded places. They can:

- set local agendas for tackling crime, including terrorism, and put in place effective partnership arrangements with other statutory agencies and the business community;
- make relevant changes in their capacity as highways authorities and owners of public spaces;
- as planning authorities, encourage the designing-in of counter-terrorism protective security measures where appropriate to new-build developments; and
- provide advice and assistance to businesses and voluntary organisations about business continuity management.

Local partnerships: options

2.15 Partnerships are vital to delivering the crowded places agenda. It will be important that, locally, a small group of key stakeholders takes leadership and responsibility for this work. They may wish to engage a wider forum in delivery, in part to ensure that there is no unintended adverse impact on community cohesion or the CONTEST *Prevent* strategy.

2.16 One option would be to use local Crime and Disorder Reduction Partnerships (CDRPs) in England/Community Safety Partnerships (CSPs) in Wales. The Crime and Disorder Act 1998 created the CDRPs/CSPs whose members (known as “responsible authorities” and drawn from police forces, police authorities, local authorities, primary care trusts (local health boards in Wales) and (from April 2010) probation are responsible for formulating and implementing strategies to tackle crime and disorder in their areas. Crime for these purposes includes terrorism. In discharging their duties under the 1998 Act, the

responsible authorities have a statutory duty to ensure that the key agencies come together to work in partnership in a CDRP/CSP.

2.17 In addition, in exercising their various functions, local authorities and police authorities are required under Section 17 of the 1998 Act to have due regard to the likely effect of their decisions on their statutory obligation to do all they reasonably can to prevent crime and disorder in their local areas.

2.18 In relation to crowded places, this includes taking into account in the decisions they make (for example, on planning or highways proposals) the impact on the vulnerability of crowded places to terrorist attack, particularly those at highest risk.

2.19 Other factors that a CDRP might bring to the local lead partnership role are:

- established crime fighting/ designing-out crime structures and procedures (e.g links to Architectural Liaison Officers);
- established links to neighbourhood policing;
- links to businesses through business crime links; and
- established performance management and reporting structures.

2.20 Community Safety Partnerships (CSPs) in Wales operate in the same way as CDRPs in England. Responsible authorities make up the CSPs in Wales and they formulate and implement strategies to tackle crime and disorder in Wales as required by the Crime and Disorder Act 1998.

2.21 The Civil Contingencies Secretariat at the Cabinet Office coordinates the UK's all-purpose resilience network, intended to improve generic central, regional and local capabilities to anticipate, respond and recover from disruption (e.g. floods or a pandemic as well as terrorism). OSCT in the Home Office is responsible for ensuring that, within this resilience framework, capabilities are in place to mitigate the effect of terrorist attacks, notably those with highest impact.

2.22 The Civil Contingencies Secretariat oversees the operations of the Civil Contingencies Act 2004. This Act established the Local Resilience Forums (LRFs) which are the principal mechanism for local multi-agency planning and preparedness.

2.23 The 2004 Act designates emergency services, local authorities, health bodies and other agencies as Category 1 responders and requires them to:

- assess the risk of emergencies occurring, including those threats and hazards that might impact on crowded places, and use this to inform contingency planning;
- put in place plans to respond to and recover from emergencies, including those relating to crowded places;
- put in place business continuity management arrangements;
- put in place arrangements to make information available to the public about civil protection matters and to maintain arrangements to warn, inform and advise the public in the event of an emergency;
- share information with other local responders to enhance resilience; and
- cooperate with other local responders to enhance coordination effectiveness and efficiency.

2.24 Local authorities also provide advice and assistance to businesses and voluntary organisations about business continuity management. The 2004 Act designates utilities companies, transport providers, the Health and Safety Executive (HSE) and strategic health authorities as Category 2 responders and requires them to share information and cooperate with other responders.

2.25 Local Resilience Forums (LRFs) must remain focused on their existing obligations, including those under the Civil Contingencies Act 2004, set out in guidance on '*Expectations and Indicators of Good Practice for Category 1 and 2 Responders*' issued by the Civil Contingencies Secretariat¹⁰. LRF members are responsible for contingency planning for possible events identified in the unclassified National Risk Register. These include possible terrorist attacks in crowded places. LRFs should not consider taking the permanent lead on protection of crowded places unless they are already fulfilling their other obligations. However, there might be circumstances where LRFs would be the best local partnership to take this work forward at least on an interim basis.

2.26 Even where LRFs do not take the lead locally in this work there will still be overlap between civil preparedness and protective security work regarding crowded places. It is important that there are effective channels of communication and information sharing established between LRFs and the lead local agency responsible for this programme.

2.27 Other factors that an LRF might bring to the local partnership role are:

- established risk assessment procedures – Community Risk Registers;
- established emergency planning and exercising procedures, both locally and regionally; and
- response and recovery planning.

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2.28 LRFs cover England and Wales (43 in England and four in Wales). In Scotland, eight Strategic Coordinating Groups (SCGs) perform a similar function. The SCGs, and their constituent members of local authorities, emergency services, the Scottish Environment Protection Agency and the utilities, all play an important role in supporting Scotland's resilience. In Scotland, practical activity to deliver reductions in vulnerability will be led locally. Where reductions in vulnerability prove difficult to deliver at the local level the option of involving the SCG (or a suitable sub-group of it) will be available.

2.29 There is no statutory obligation to establish LRFs in Northern Ireland under the Civil Contingencies Act 2004 (although one exists).

Agreeing a local delivery organisation

2.30 Government Offices will discuss with key local stakeholders what arrangements would work best in their local areas to progress the agenda for reducing the vulnerability of crowded places to terrorist attack and identify a consensus on the lead local partnership. Local stakeholders should consider and debate these issues with Government Offices. The expectation is that Government Offices will ensure arrangements are put in place for a lead local body held accountable for delivery. If local agreement is not reached through normal channels, Government Offices will facilitate joint discussions with the relevant local leaders, including local authority chief executives, Basic Command Unit (BCU) heads and Chairs of the CDRPs, LRFs and Local Strategic Partnerships in order to agree a way forward.

2.31 Whatever local arrangements are agreed, these arrangements should ensure that the risks identified by local CTAs are owned properly at the local level, that there are no gaps in coverage or overlap of responsibilities and, most importantly, command their confidence. Government Offices will also ensure that there is effective communication at the local level between all those agencies with contributions to make locally.

Legal provisions

2.32 In addition to those identified above, relevant statutory and other bases for local authorities' engagement with counter-terrorism, including action to reduce crowded places vulnerabilities to terrorist attack include:

- Section 2 of the Local Government Act 2000 which provides local authorities with a power to do anything which they consider is likely to achieve either the economic, social or environmental well-being of their area and requires that they prepare a Sustainable Community Strategy to promote the economic, social and environmental well-being of their area;
- Section 106 of the Local Government and Public Involvement in Health Act 2007 which places a duty on local authorities and their partners to prepare and submit a draft of a Local Area Agreement specifying local improvement targets and have regard to them in their business;
- the Building Act 1984 and the Building Regulations 2000 include a requirement that all new buildings are designed to be structurally stable. Although this legislation does not specifically refer to bomb or vehicle attack, the fundamental principles of providing in-built robustness for a building or structure to resist disproportionate collapse from whatever cause are similar. Another part of the 1984 Act provides local authorities with powers to deal with dangerous buildings, e.g. as a result of explosions or impacts;
- *Creating Strong, Safe and Prosperous Communities*¹¹ explains how local authorities and their partners can work through their Local Strategic Partnerships, including sub-partnership groupings such as Crime and Disorder Reduction Partnerships, to discharge their Local Area Agreement functions;

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- *Planning Policy Statement 1 (PPS1)*¹² sets out the Government's overarching objectives for the planning system, including the objective for new developments to create safe and accessible environments where crime and disorder, or the fear of crime, does not undermine quality of life or community cohesion; and
- *Delivering Safer Communities: a Guide to Effective Partnership Working*, which sets out the Hallmarks of Effective Partnerships.

Local businesses and other local organisations

2.33 Improving counter-terrorism protective security is a collective responsibility. Business is already familiar with the importance of working with partners to achieve its goals and this way of working is even more relevant to counter the terrorist threat. Business has a right to expect consistent, high quality counter-terrorism protective security advice relevant to their circumstances and this will be delivered at a national level by NaCTSO and at a local level by the CTSAs. Lead partners should ensure good communication and liaison with the local business sector through appropriate local structures, e.g. Business Improvement District Security Forums, Chambers of Commerce, town centre managers.

Fire and rescue services

2.34 As a 'responsible authority' within CDRPs/CSPs, fire and rescue authorities contribute to the formulation and implementation of strategies to tackle crime and disorder in their areas. Crime for these purposes includes terrorism.

2.35 In England and Wales, the Fire and Rescue Services Act 2004 sets out the core duties of the Fire and Rescue Service, which include fire safety, fire-fighting and responding to road traffic collisions and emergencies. In addition, the Regulatory Reform (Fire Safety) Order 2005 sets out the responsibility for managing fire safety in

non-domestic buildings. In Scotland, both the Fire and Rescue Service's core duties and the non-domestic fire safety regime are contained in the Fire (Scotland) Act 2005, as amended. The Fire and Rescue Service manages its resources on the basis of risk through a process called Integrated Risk Management Planning. By determining levels of risk within an area, a Fire and Rescue Service can decide its response times and its audit functions in relation to premises covered by the fire safety legislation.

2.36 The responsibility for fire safety – so far as that includes making sure escape routes are not blocked, that fire doors are not propped open and so on – lies principally with the employer, persons who have some level of control over the premises, or owners. The fire safety legislation requires those persons to carry out a fire risk assessment and put in place suitable fire precautions or fire safety measures to control or reduce the risk of fire. Anyone responsible for fire safety in crowded places such as shopping centres, sports stadia and other large venues would need to have in place an evacuation strategy in the event of a fire breaking out. Such venues are likely to be classed as high risk by the Fire and Rescue Service and will be audited accordingly.

2.37 Related to this are venues which require a licence. Any licence issued under, most commonly, the Licensing Act 2003 (or the equivalent legislation in Scotland) cannot contain conditions relating to fire as these must be covered by the fire risk assessment. It is expected that licensing authorities and Fire and Rescue Services will liaise over licence applications to ensure that all issues relating to capacity and other issues that affect crowded places are fully considered.

2.38 Within NHS Trusts in England, the NHS Security Management Service (NHS SMS) has responsibility for all policy and operational matters related to the management of security delivery within the NHS. Its strategy, based upon identifying problems, developing appropriate solutions and taking action through a national structure, is delivered through the Local Security Management Specialists (LSMS). In Scotland, physical security matters in the NHS are generally the responsibility of estates and facilities personnel but consideration is being given as to how these arrangements can be better co-ordinated. As the crowded places work agenda progresses, there may be opportunities in certain sectors, such as health, to use local risk managers to underpin the risk assessment process.

Chapter 3 Reducing the vulnerability of crowded places

3.01 This chapter explains in more detail the work of police Counter-Terrorism Security Advisers (CTSAs) to assess the vulnerability of crowded places and the subsequent actions that local stakeholders need to take regarding crowded places which are most at risk of a terrorist attack. This chapter also describes a vulnerability self-assessment tool that is being developed by NaCTSO for use by owners of crowded places.

Assessing the risk of crowded places

3.02 The 2007 review of crowded places (see paragraph 1.02 above) recommended the introduction of a standard way of assessing vulnerability and other relevant factors using a risk assessment matrix. The purpose of the matrix and the assessments is to enable local partners, through the lead local partnership (see Chapter 2) to prioritise work to reduce the vulnerability of crowded places to terrorist attack and assess progress. The risk assessments show the relative risk of a crowded place to terrorist attack compared to others: it does not reflect a view of the chances of one particular site being targeted by terrorists.

3.03 The matrix was developed in conjunction with the Association of Chief Police Officers (Terrorism and Allied Matters) (ACPO (TAM)) the National Counter-Terrorism Security Office (NaCTSO) the Centre for the Protection of National Infrastructure (CPNI) the Joint Terrorism Analysis Centre (JTAC) and the Cabinet Office Civil Contingencies Secretariat. It was issued by NaCTSO in 2008 to CTSAs. A summary of the matrix and guidance is attached at Annex A.

3.04 The national network of CTSAs will undertake risk assessments at the lowest tier of local authority. This means:

- in England, district councils, unitary authorities, London boroughs or metropolitan boroughs;

- in Scotland, the thirty-two unitary authorities;
- in Wales, county councils and county borough councils; and
- in Northern Ireland, district councils.

3.05 As they complete the assessments - and in making any recommendations for protective security improvements - CTSAs will focus their action on those crowded places they consider to be at highest risk. They will take account of information available to them about the generic threat crowded places face and consider the particular threat profile at particular local sites. Specific threat information about precise locations will be dealt with through police-led operations. Site owners and/or their representatives can raise any concerns they may have about their site assessment with the CTSAs and/or the Counter-Terrorism/Operational Commander of the local police force.

3.06 CTSAs will take account of local authority views on the crowded places business sectors that feature most prominently in their local area and any specific crowded places that ought to be included in the assessment. They will consult other local police officers responsible for the wider community safety agenda. Quality assurance will be provided by NaCTSO reviewing a sample of CTSA assessments, together with CTSAs undertaking some peer group reviews.

3.07 The first risk assessments of crowded places were completed in 2008. This exercise will be repeated annually by the CTSAs and the findings reported to NaCTSO and OSCT. This information will form the baseline against which future progress will be measured. CTSAs will also conduct informal reviews during the year. While in coming years we are looking to reduce the vulnerability of all crowded places to

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terrorist attack, priority in the first stages will be those shown by the CTSA risk assessments to be at highest risk.

Information sharing

3.08 Information about crowded places needs to be shared with those who need to know so that they can contribute to reducing vulnerabilities to terrorist attack. Heads of police Basic Command Units (BCUs) and/or CTSA's will brief key partners on risk and vulnerability assessments so that they are in a position to respond. Key partners include:

- private/third sector owners of crowded places;
- local authority chief executives and/or their nominated representatives; and
- lead local partners.

NaCTSO and OSCT will have summary information as part of their oversight of the performance management framework.

3.09 Where the lead local partner is not a local civil contingencies responder, police BCU Heads and/or CTSA's will also share relevant information with responders to inform resilience and civil contingencies planning. (The Civil Contingencies Act 2004 and the Contingency Planning Regulations 2005 place a duty on civil contingencies responders to share information and cooperate with each other for the purposes of resilience and civil contingencies planning).

3.10 Information that is shared will need to be protected and handled in accordance with guidance provided in the Government's Protective Marking Scheme (GPMS). Most crowded places risk and vulnerability assessments will be marked 'Protect – Commercial'. Guidance on security requirements for handling protectively marked material can be found in the Cabinet Office Security Policy Framework¹³. CTSA's will provide any further advice if

necessary. Any issues of principle regarding protective security can ultimately be referred to OSCT.

3.11 Information expected to be shared with a range of partners and relevant protective security markings are shown in Annex B.

Crowded places action plans

3.12 Where an assessment has shown a crowded place to be high or medium-high risk, the local partnership should put in place an action plan. Action plans should be owned by local authorities and delivered by the site owner and other appropriate local partners. Action plans can be either for individual or multiple sites, depending on local circumstances and approaches, e.g. there may be sites that can be brigaded together in terms of action planning. A draft action plan template is attached at Annex C.

3.13 The action plan should:

- detail the actions that will reduce the vulnerabilities highlighted in the risk assessment and highlight those actions which the local authority and, where appropriate, the site owner and other local partners, have agreed to implement (with timescales);
- be proportionate to the level of risk; and
- set out clear and tangible milestones in tracking progress.

3.14 Where action plans exist, they will form part of the consideration made by CTSA's when they conduct their annual re-assessments and informal reviews. Action plans should be appropriately protectively marked.

Chapter 3

Vulnerability self-assessment tool

3.15 To help crowded places that are not prioritised for assessment by CTSA's, NaCTSO is devising a web-based Vulnerability Self-Assessment Tool (VSAT) that will enable site owners to assess their security and identify the counter-terrorism protective security measures they need to implement to address any vulnerabilities at their site. This self-assessment promotes engagement with local partners and the development of action plans to help guide site owners to prioritise their work.

3.16 Users of the Vulnerability Self-Assessment Tool (VSAT) will be able to use the web site to access videos, training aids and other information specific to their sector to ensure that their knowledge remains up-to-date and relevant to their needs. Those using the tool will have access to up-to-date counter-terrorism protective security good practice advice. They will be supplied with advice and tools which will allow them to reduce their vulnerability to a terrorist attack.

3.17 Information about VSAT will be available from local CTSA's including how to access and use it.

4.01 There are already many examples of good practice counter-terrorism protective security which demonstrate what can be achieved to reduce the vulnerability of crowded places. Some of these are included in this chapter. Further information, including the counter-terrorism protective security guidance already available to local authorities and businesses can be found at the NaCTSO website¹⁴ and in the publications listed at Annex D. The *'Crowded Places: The Planning System and Counter-Terrorism'*¹⁵ publication provides practical advice on how best to design counter-terrorism protective security measures into new developments: designing in counter-terrorism measures is the most cost effective way to enhance protective security of crowded places.

Hostile vehicle mitigation

4.02 Vehicle bombs can be highly destructive. The direct effects of a bomb blast can be lethal: flying debris such as glass can also present a hazard many metres away from the seat of the explosion.

4.03 If a town centre or other venue is thought to be at high risk from any form of Vehicle-Borne Improvised Explosive Device (VBIED) the following measures should be considered:

- traffic calming, such as road bends or chicanes, in order to slow the speed of approaching vehicles so that the impact of any VBIED is reduced and more time is available to assess vehicles and their occupants;
- vehicle access controls, particularly at goods entrances and service yards. Details of contract vehicles and the identity of the driver/passengers should be authorized in advance;
- access controls to check that delivery vehicles are expected by the receiving

unit retailer before they are granted access into goods/service areas;

- a vehicle search regime at goods/service entrances that is flexible and can be tailored to a change in the threat or response level;
- blast resistant measures, with particular attention to windows;
- bomb threat and evacuation drills. Depending on where the suspected vehicle bomb is parked and the design of the building, it may be safer to evacuate to a windowless corridor or basement than outside;
- robust physical barriers to keep all but authorized vehicles at a safe distance; and
- training of and rehearsal for staff to identify suspect vehicles and to respond to bomb threats. Key information and telephone numbers should be prominently displayed and readily available.

Use of closed-circuit television (CCTV)

4.04 Closed-Circuit Television (CCTV) allows for remote observation of specific areas and should be used as part of an integrated security system. This may include links to Automatic Number Plate Readers (ANPR).

Access control into goods yards and underground service areas

4.05 Examples of good practice include:

- logging each vehicle as it enters the service area, the store they are delivering to and a contact number. After a period of time (say 20 minutes) checks are made on the delivery driver and store to confirm that that the delivery is still taking place;

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- if there is an increase in threat or response levels, guards to be deployed to the goods vehicle entrances to carry out vehicle searches; and
- notification of all deliveries and contractor visits in advance. User name and passwords are issued to contractors and unit retailers after the appropriate documentation has been submitted, checked and authorised. Any vehicle arriving without appointment is refused entry to the site.

Searching

4.06 Good practice measures for searching spectators entering a premise include:

- encouraging people, via ticketing and websites, not to arrive with bags;
- “fast-tracking” those spectators who do not have bags;
- ensuring sufficient number of trained searchers are present to prevent queuing for those spectators arriving with bags; and
- random searches of spectators who arrive without bags/rucksacks.

4.07 Other good practice measures include:

- site searches as part of daily routine before, during and after opening hours;
- sites should have a sectorised, systematic and thorough search plan in place; and
- sites should consider implementing an overt person and/or vehicle search regime to further enhance the security of their site or have the ability to implement such a regime should there be a change in threat or response levels.

Hostile reconnaissance

4.08 Many sites across the crowded places sectors have briefed their staff on the identification of hostile reconnaissance by suspected terrorists, either through Project Argus, Project Griffin or Operation Lightning or by NaCTSO/CTSA presentations. One of the most important issues in this area is that security staff, including door supervisors and other personnel, recognise suspicious activity and know how, and to whom, to report it. Details of Project Argus, Project Griffin and Operation Lightning can be found at paragraphs 4.14 - 4.21 below.

Managing crowds safely

4.09 Large crowds are a normal part of the operation of many public venues such as railway stations, shopping centres, nightclubs, visitor attractions and sports stadia.

4.10 Crowd safety is primarily a management responsibility and requires the application of the best practices of health and safety management to ensure potential vulnerabilities, such as bottlenecks, are reduced. All who run venues, organise events or manage places which attract crowds should have a health and safety management system which anticipates, monitors and controls potential crowding risks.

4.11 Different types of crowd behave in different ways. For example, shoppers in a crowded mall, each with their own interests, make up a different crowd from spectators at a sports stadium. It is important to know, for example, the age-range and social mix of visitors to anticipate probable behaviour and make appropriate arrangements for it.

4.12 Good practice in this area includes:

- researching the type of visitor that is expected at the venue and anticipating likely crowd behaviour;
- where available, collating and assessing information about the health and safety record of previous events at the venue;

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- conducting a risk assessment to decide the adequacy of arrangements in place to control crowds and change them if necessary;
- inspecting the venue and reviewing crowd safety arrangements at regular intervals;
- setting targets for crowd management (for example, if queues extend past a particular point, open another service point); and
- liaising with outside organisations such as the police and emergency services.

Town centre management

4.13 When reviewing counter-terrorism protective security, town centre managers should consider

- staff training in Project Argus and hostile reconnaissance, to include local authority staff, street cleaners etc;
- CCTV monitoring of vehicles and people for evidence of suspicious activity;
- traffic warden awareness of suspicious vehicles;
- management of litter bins;
- good housekeeping in back-of-house areas; and
- controlled access of goods vehicles into service areas. In addition, where possible, any vehicle movement close to crowded areas should be treated with suspicion and vehicular access to areas of dense crowding should be robustly prevented.

Project Argus

4.14 Project Argus is a counter-terrorism tabletop exercise produced by NaCTSO and delivered by the national network of police CTAs. The exercise scenario comprises a coordinated terrorist attack targeting a crowded place. It is specifically aimed at the various sectors of the business community such as retail, leisure and commercial centres and aims to provide valuable counter-terrorism advice on protective security, resilience and hostile reconnaissance in light of the current terrorist threat.

4.15 Project Argus takes businesses through a simulated terrorist attack. This provides a realistic scenario which prompts open discussion to identify the measures for preventing, handling and recovering from a terrorist attack. It also explores participants' expectations and compares them against reality. Delegates are split into small syndicate groups and asked to work through a number of questions and scenarios prompted by the simulated sequence of events and the CTA facilitators are supported by a panel of experts.

4.16 These events have been successfully run since January 2007 and have been developed to target different business sectors including retail, leisure, hotels, health and education. They are facilitated by CTAs and are free of charge. Project Argus will continue to be developed for other sectors.

Argus Professional and Argus Planners

4.17 Architects, designers and planners can play a significant role in delivering improved counter-terrorism protective security. Argus Professional was launched in 2008 to target built environment professionals including architects and designers, with a modified version (Argus Planners) for an audience consisting of planners from both the private and public sectors. Both versions aim to demonstrate that counter-terrorism protective security measures can be designed into structures and space to create safer crowded places.

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Project Griffin

4.18 Project Griffin is a police-private sector initiative to accredit security personnel in identified locations by their attendance at a one day course in order to improve their skills and knowledge in relation to counter-terrorism activity.

4.19 Project Griffin aims to encourage members of the community to work in partnership with the police to deter and detect terrorist activity and crime. This will be achieved by working with the community to:

- raise awareness of current terrorist and crime issues;
- share and gather intelligence and information;
- build and maintain effective working relationships;
- seek solutions to defeating terrorism and crime;
- maintain trust and confidence in the police and other authorities; and
- empower people to report suspicious activity and behaviour.

4.20 The main strand of Project Griffin is very much about the police sharing information with key trusted partners in the community, by providing input through an 'Awareness Day'. It aims to empower local partners to recognise and report suspicious activity and behaviour to the police. The Awareness Day also serves to help people think about their own local procedures and processes for dealing with certain types of incident during times of emergency¹⁶.

Operation Lightning

4.21 Operation Lightning is a police coordinated hostile target reconnaissance operation to identify those who might be concerned in terrorist activity and/or domestic extremism. This helps to gather intelligence to research, record, investigate and analyse suspicious sightings or activity, near to or at prominent or vulnerable structures or buildings.

Annex A: Home Office and National Counter-Terrorism Security Office (NaCTSO) guidance: crowded places risk assessment matrix

This risk matrix has been developed by OSCT in the Home Office in conjunction with:

- the Association of Chief Police Officers (Terrorism and Allied Matters) (ACPO(TAM)) and NaCTSO;
- the Centre for the Protection of National Infrastructure (CPNI) that provides specialist advice on counter-terrorism protective security;
- the Joint Terrorism Analysis Centre (JTAC). JTAC is a multi-agency unit established in 2003 which is an authoritative and effective mechanism for analysing all-source intelligence on the activities, intentions and capabilities of international terrorists. It sets threat levels and issues timely threat warnings (relating to international terrorism) as well as providing more in-depth reports on trends, terrorist networks and capabilities; and
- other key stakeholders including Cabinet Office Civil Contingencies Secretariat, Department for Communities and Local Government and Kent Police.

The stages of the risk assessment process

The CTAs begin the assessment process by drawing up a list of crowded places which may be at a relatively high risk of a terrorist attack. The sites to be considered will be based on their own knowledge of the local area as well as up-to-date information from other sources e.g. crime figures, details of licensed premises, reports from Special Branch and other police colleagues, members of

organisations such as Crime and Disorder Reduction Partnerships (CDRPs) and local authorities. It may make sense for some sites to be grouped together for the purpose of the risk assessment matrix, e.g. a town centre with a group of pubs and nightclubs adjacent to each other.

The risk assessment process will then follow the following stages:

- filter (based on an assessment of the attractiveness of a site to terrorists and the potential impact of a terrorist attack). This is intended to avoid unnecessary assessments of vulnerability for low risk sites;
- vulnerability assessment of a site. Taken together with the assessment of the attractiveness of site/threat, this will provide an assessment of the relative likelihood of a terrorist attack for sites which have passed the first stage filter;
- risk assessment of a site. This brings together the relative likelihood and impact of a potential terrorist attack to provide a measure of the overall relative risk of a terrorist attack; and
- grouping of risk assessments of individual sites by crowded places sector for each local authority area.

The results of the risk assessment process

The attractiveness of site/threat, vulnerability and impact assessment all use a five point scale, ranging from Very High to Very Low. These are brought together to produce one of four risk severity ratings as shown in the table below.

Relative assessments

The assessments made using the guidance are relative and do not reflect a view of the chances of one particular site or area being targeted by terrorists. The assessments are generated for the purposes of prioritising of counter-terrorism protective security activity.

Risk severity scale

High	This risk is the one which generates the highest concern. Comprehensive action is required as a high priority to reduce vulnerability, wherever possible and proportionate.
Medium-High	The consequences of the risk materialising would be substantial. Action is required as a priority to mitigate the risk, wherever possible and proportionate.
Medium	Local area is uneasy about carrying this risk. The risk is not substantial and can be managed via contingency plans. Status of risk should be monitored regularly.
Low	The risk should be addressed if possible and contingency plans are required. This risk should be managed at local level.

Summary report by crowded places sector for each local authority area

Assessments made of individual sites in a local area will be aggregated to give overall assessments of risk and vulnerability by crowded places sector. In general, the risk and vulnerability ratings allocated to a crowded places sector should be equal to the highest risk and vulnerability ratings of a site within that sector. Similarly, the overall risk and vulnerability ratings for the local authority area as a whole should normally equal the highest risk and vulnerability ratings in any of the crowded places sectors. However, this overall assessment across the sectors may take account of local judgments about weightings to be given to the different business sectors within the local areas. The number of sites falling into the highest categories will provide an additional indication of the scale of the challenge in reducing the risk and vulnerability in a particular area. It is recognised that

in certain circumstances it may not be possible to achieve further reductions in vulnerability.

Counter-Terrorism Security Advisers (CTSAs) will complete the risk assessments in consultation with key local partners and in line with this guidance. Further advice on completion of this matrix is available to CTSAs from NaCTSO.

CTSAs will return summary forms to NaCTSO using the NaCTSO secure data information channel and NaCTSO will pass them to OSCT in the Home Office. NaCTSO and the Home Office will then send these summaries to Government Offices/ Devolved Administrations. Government Offices/ Devolved Administrations will monitor and encourage progress in reducing crowded places vulnerabilities with local authorities and other local partners, reporting results to the Home Office and NaCTSO.

Annex B: Information exchange between national and local stakeholders

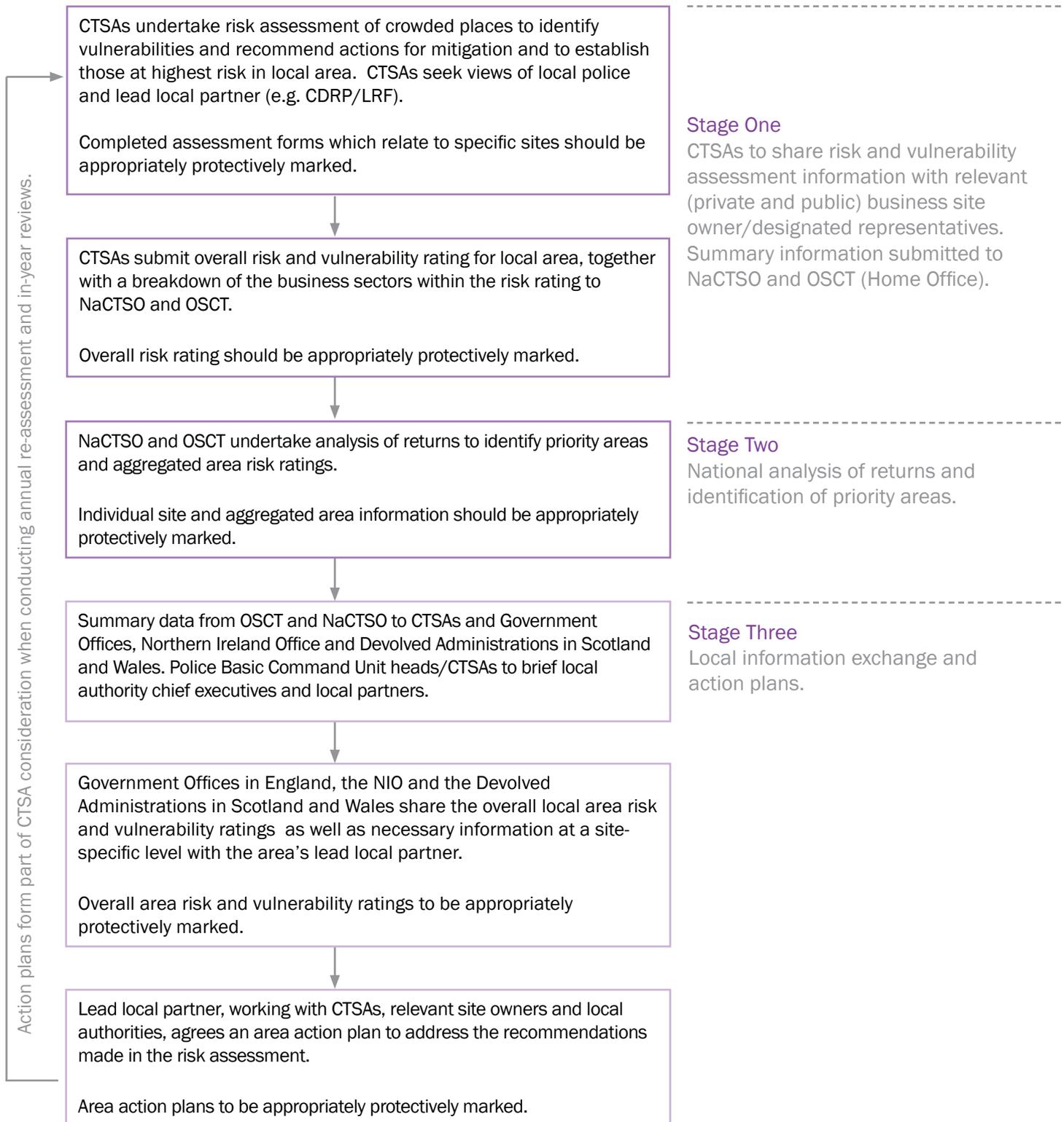


Table 2: Protective Security Markings

Information relating to:	Protective marking under Government Protective Marking Scheme
CTSA survey given to individual site owner identifying vulnerabilities and recommendations for mitigation.	Protect – Commercial
Individual and aggregated site information (e.g. local authority areas or Government Office regions) containing site location and risk and vulnerability assessments.	Protect-Commercial, Confidential or Secret



Annex D: Useful publications

NaCTSO guidance

NaCTSO counter-terrorism protective security advice booklets for business sectors:

- bars, pubs and clubs;
- shopping centres;
- stadia and arenas;
- visitor attractions;
- theatres and cinemas;
- restaurants and hotels;
- higher and further education institutions;
- commercial centres;
- health;
- major events; and
- religious sites/places of worship.

Additional NaCTSO guidance booklets

- Secure in the Knowledge; building a secure business; and
- Expecting the unexpected.

NaCTSO publications available at:
www.nactso.gov.uk

Home Office/Communities and Local Government publications

- Safer Places: The Planning System and Crime Prevention;
- Crowded Places: The Planning System and Counter-Terrorism;
- Protecting Crowded Places: Design and Technical Issues;
- Working Together to Protect the Public: The Home Office Strategy 2008–11;
- Development of the new LAA framework: Operational Guidance 2007; and

Creating Strong, Safe and Prosperous Communities Guidance:

www.communities.gov.uk/publications/localgovernment/strongsafeprosperous

Home Office publication are available at:
www.security.homeoffice.gov.uk

Communities and Local Government publications are available at:
www.communities.gov.uk/publications

Other guidance

Protecting Against Terrorism – available at
www.mi5.gov.uk; and

Health and Safety Executive leaflet:
Managing crowds safely – available at
www.hse.gov.uk

Contact

For further information contact the Crowded Places Team on:

 020-7035-0886

crowdedplacespublications@homeoffice.gsi.gov.uk

End notes

1. The CONTEST Strategy can be found at:
www.official-documents.gov.uk/document/CM75/7547/7547.pdf
2. The Written Ministerial Statement can be found at:
www.publications.parliament.uk/pa/cm200708/cmhansrd/cm071114/wmstext/71114m0001.htm#07111429000008
3. The documents issued for public consultation were entitled '*Working Together to Protect Crowded Places*' and '*Safer Places: A Counter Terrorism Supplement*'. These have been replaced by finalised documents '*Working Together to Protect Crowded Places*', '*Crowded Places: The Planning System and Counter-Terrorism*' and '*Protecting Crowded Places: Design and Technical Issues*' which can be found on the Home Office website: www.security.homeoffice.gov.uk
4. The CONTEST Strategy can be found at:
www.official-documents.gov.uk/document/CM75/7547/7547.pdf
5. '*Development of the new LAA framework: Operational Guidance 2007*' and '*Creating Strong, Safe and Prosperous Communities: Statutory Guidance*'. Further guidance about the LAAs is also available in CLG's publication '*LAA negotiations in 2008: Lessons Learnt*':
www.communities.gov.uk/publications/localgovernment/laa2008lessons
www.communities.gov.uk/publications/localgovernment/laaoperationalguidance
www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps1/
6. See DfT website:
www.dft.gov.uk/transportforyou/security/transportsecuritycontactdetails
7. These documents can be found at:
www.security.homeoffice.gov.uk/science-innovation/instinct
8. Copies are available from: www.nactso.gov.uk
9. More information is available from: www.nacsto.gov.uk
10. www.cabinetoffice.gov.uk/media/217546/expectations_set-parts1to3.pdf
11. www.communities.gov.uk/publications/localgovernment/strongsafeprosperous
12. www.communities.gov.uk/planningandbuilding/planning/planningpolicyguidance/planningpolicystatements/planningpolicystatements/pps1/
13. The Cabinet Office Security Policy Framework can be found at:
www.cabinetoffice.gov.uk/spf/sp5_ps.aspx
14. NaCTSO website www.nactso.gov.uk
15. Crowded Places: The Planning System and Counter-Terrorism can be found at:
www.security.homeoffice.gov.uk
16. More information can be found at www.projectgriffin.org.uk

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