



SHREWSBURY TOWN COUNCIL

APPROACH TO SECURITY PLANNING

MARCH 2022

The Purpose of this policy is to set out Shrewsbury Town Council's (STC) approach to protecting the public, its staff, stakeholders, partners and assets and ultimately reputation against the threat of terrorism at a local level.

This policy is written on the back of the Government's moving direction to place a **Duty to Protect** on all event organisers and owners of land and buildings whilst organising public focussed events.

In considering the content of this policy, advice has been sought from the Shropshire Safety Advisory Group and the Counter Terrorism Security Advisers at West Mercia Police.

References - Websites

This policy has due regard to the following national bodies with an interest in the field of Safety, Security and Counter-terrorism:

National Counter Terrorism Security Office (NaCTSO) – [National Counter Terrorism Security Office - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Counter Terrorism Security Advisers (CTSA) - [Working with counter terrorism security advisers - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Centre for Protection of National Infrastructure (CPNI) – [Centre for the Protection of National Infrastructure | CPNI](http://www.cpni.gov.uk)

Health & Safety Executive - [HSE: Information about health and safety at work](http://www.hse.gov.uk)

References - Documents

This policy also has regard to the following:

Health & Safety Executive Event Safety Guide also known as The Purple Guide - [The Purple Guide](http://www.hse.gov.uk)

Health & Safety At Work Act 1974 - [Health and Safety at Work etc. Act 1974 \(legislation.gov.uk\)](http://www.legislation.gov.uk)

Licensing Act 2003 - [Licensing Act 2003 \(legislation.gov.uk\)](http://www.legislation.gov.uk)

Counter Terrorism & Security Act 2015 - [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](http://www.legislation.gov.uk)

ACT Action Counters Terrorism - Awareness E-Learning, certificated course.

www.gov.uk/government/news/act-awareness-elearning

Policy Objectives

This policy is designed to fulfil two key objectives:

1. To define the Town Council's roles and responsibilities in being the lead organisation in managing events within its remit, obligations and responsibilities. This will include such events as Christmas Lights Switch-on and Remembrance Sunday;
2. To define the Town Council's roles and responsibilities in hosting events on its own land.

Introduction

The threat from terrorism to the UK remains both real and serious. An attack could take place at any time, in any location without warning.

S1 Terrorism Act 2000 defines terrorism as: *“the use or threat of a specified action where the use or threat is designed to influence the government or an international government organisation or to intimidate the public or a section of the public and the use or threat is made for the purpose of advancing a political, religious or ideological cause. The action is a specified action if it involves serious violence against a person; involves serious damage to property, endangers a person's life, other than the person committing the action, creates a serious risk to the health and safety of the public or a section of the public or is designed seriously to interfere with or seriously disrupt an electronic system”*.

Acts of terrorism vary in terms of scale and purpose. Some seek merely to inflict superficial damage or cause public distress to draw attention to a particular cause. But others carry a more malicious intent. Terrorism is not just about violent attacks on people and property. Disrupted communications systems, damaged assets and tarnished reputations can cause immediate and/or long-term harm to an organisation even as small as the Town Council. It is imperative therefore that the Town Council assesses its risks and makes appropriate measures to protect both itself as a corporate body, its staff, any service/asset users and the public at large who have interaction with those services/assets.

Statutory Duties

There are a number of statutory duties placed on the Town Council that fall under the responsibility of protecting the public from harm of a terror threat:

S17 Crime & Disorder Act 1998 – The Council must have due regard to their likely effect on Crime & Disorder and to do all it reasonably can to prevent crime and disorder (which includes terrorism).

Occupiers Liability Act 1957 – An occupier of premises is under a duty to their lawful visitors to take such care as in all the circumstances of the case is reasonable to see that the visitor

will be reasonably safe when using the premises for the purposes for which they are invited or permitted by the occupier to be there.

S26 Counter Terrorism & Security Act 2015 – There is a duty on specified authorities in the exercise of their functions to have due regard to the need to prevent people from being drawn into terrorism. A Parish Council is not listed in the act but is duty bound by its work with partners in local efforts to prevent people from being drawn into terrorism.

S4 Licensing Act 2003 – details the 4 key objectives on licensing authorities and any organisation licensed under the act; these include:

- Prevention of Crime & Disorder
- Public Safety
- Prevention of Public Nuisance
- Protection of Children from Harm

Martyn's Law /Emerging Protect Duty

The protect duty has been championed by the victim's groups including the Martyn's Law campaign, which was established by Figen Murray following the tragic loss of her son, Martyn, in the Manchester Arena attack in May 2017. A Public Inquiry has subsequently made recommendations on maintaining public safety against terror attacks.

Government has consulted on and subsequently outlined its intentions to introduce a new Protect Duty. This will require public places and venues to improve security designed to ensure the public is better protected from a multi-faceted, diverse and continually evolving terror threat.

There is likely to be a consistent and proportionate process for enhancing security across any place or space to which the public have access. This will include:

- That they engage with freely available counter terrorism advice and training
- That they conduct vulnerability assessments of their operating places and spaces
- That they mitigate risks created by the vulnerabilities identified
- That they develop and implement a counter terrorism plan

Crowded Places to Publicly Accessible Locations

The implementation of the Protect Duty is likely to expand the area under which the statutory requirement shall cover. Currently reference is made to Crowded Place; this shall be evolved into Publicly Accessible Locations (PAL).

A **Crowded Place** is defined as "a location or environment to which members of the public have access that may be considered potentially liable to terrorist attack by virtue of its crowd density. This includes sports stadia, pubs and clubs, high streets, shopping centres parks & open spaces"

A **Publicly Accessible Location (PAL)** is defined as “any place which the public or any section of the public has access on payment or otherwise as a right or by virtue of express or implied permission” and includes:

- Public venues with a capacity of over 100 people such as stadiums, tourist attractions and shopping centres
- Large organisations including retail or entertainment chains with minimum of 250 staff
- Public spaces such as parks, beaches and thoroughfares.

It would therefore seem prudent to put in place measures to meet this evolving statutory duty and embed the culture of terrorism management in everyday working practices.

Why a Security Plan?

The need for a Security Plan is multiple including:

- **Health and safety** - Health and safety at work legislation and regulations place a legal responsibility on the owner or occupier of premises to have a ‘duty of care’ for staff and visitors. In the event of an incident, any subsequent inquiry or court proceeding will look for evidence that the relevant legislation was followed and given due regard in the Town Council’s operational policies and procedures.
- **Business continuity** - In the event of an incident, the Town Council must aim to return to ‘business as usual’ as soon as possible.
- **Loss of reputation** - The reputational damage of a security breach is something that will concern all senior management – the loss of trust following a failure to protect staff, users and the public or even data may prove difficult to recover.
- **Costs** - Lost or destroyed assets may need to be replaced quickly and at great cost. This is in addition to any losses that might be incurred through the suspension of normal council operations.

Security Planning

Any security plan should be informed, integrated and multi-layered, showing due regard to interagency operations and capabilities. It must be **reasonable, proportionate** and **relevant** to be deemed fit for purpose.

The Town Council cannot remove all of the threats it may face, but it should possess a plan to protect its most valued assets and prepare its response to major disruptions. Security planning must not evolve in an arbitrary or ad-hoc manner, nor develop solely from previous mistakes and errors.

To be effective, the security plan must be built on information about almost every aspect of the Town Council's business both now and into the future. It must be fully integrated with everyday operations, supply chains and routines. And it needs to be 'multi-layered' – where each measure is reinforced by the next, embeds with other multi-layered partnership arrangements like Team Shrewsbury, the Safety Advisory Group and the Big Town Plan Partnership and is well understood.

Ownership of the Plan

A security plan is a working document where every aspect is constantly reviewed and updated in response to organisational change. The plan forms part of the Town Council's overall Risk Management Strategy with the Town Clerk being the lead officer, who takes on the responsibility for overseeing arrangements and who possesses the authority to co-ordinate actions.

Senior Management Team

It is crucial that the plan carries the full support of the Senior Management Team and that this is communicated throughout the Town Council, particularly where certain members of staff carry delegated responsibilities. In the event of an incident, the authority of those responsible for co-ordinating the response must be clearly understood by all staff and supported by a clear command and control structure, matrix of duties, responsibilities and accountabilities.

Collaboration

The exchange of advice and information is an important part of all security plans. The opinions of the Senior Management Team and staff across the organisation will be essential. But so too will be contributions from those outside of the Council such as the emergency services, Safety Advisory Group, Users of facilities and specialist experts (structural engineering, IT etc).

Confidentiality

The Security Plan will contain some of the most sensitive information available about the Town Council and its operations and so it is important to be clear who has full access and how it is distributed. This applies as much to internal staff as it does to external audiences.

The Security Plan has an exemption of disclosure under S24 & S38 Freedom of Information Act 2000.

Plan Components

The Plan embeds a number of components:

- **Information:** An assessment of the Town Council and the environment in which it operates – the Threat, Risk or Harm to its assets, structure and operational capabilities and vulnerabilities.
- **Protective security:** The measures that protect against identified threats and vulnerabilities.
- **Response planning:** How the Town Council will respond in the event of disruption.
- **Business Continuity Planning:** Objectives of the plan to provide a flexible response so that the Town Council can:
 - Respond to a disruptive incident (Incident Management)
 - Maintain delivery of critical activities and services during an incident (Business Continuity)
 - Return to business as usual (Resumption & Recovery)
- **Organisational culture:** Building security awareness across the whole of the Town Council

The vulnerabilities

The Town Council has set the following priorities for protection:

- **People** – staff, visitors, contractors, customers.
- **Physical assets** – land, buildings, contents, equipment and sensitive materials.
- **Information** – IT systems, online transaction systems, electronic and paper data.
- **Processes** – supply chains, critical procedures, production cycle.

There needs to be a clear consensus about those assets which are regarded as valuable and those which are regarded as essential.

Most valuable

The most valuable assets include those assets which the organisation has a duty to protect (including staff, client services, production systems etc); High-value assets that are worth additional or specific security investment and Unique assets which, though not necessarily of a high monetary value, would be difficult to replace.

Most essential

The most valuable assets may not necessarily be the most essential. The latter are those assets – equipment, information systems, transportation etc – vital to the day-to-day running of the Town Council, if lost or compromised, could have major implications for other parts of the business. The task of identifying which assets are the most essential should not be completed through discussions amongst management alone. Staff should be consulted about how the temporary loss of their service area will impact on the operations of the Town Council. Though all staff will contribute to the normal running of business, not all will be essential for delivering the basic services.

Key Overriding Actions

In developing its security planning functionality, regardless of whether it is organising an event or facilitating others to organise an event on its land, the Town Council shall take the following actions:

A1 - Keeping up to speed with the latest Guidance

The Town Council shall keep up to date with national guidance as communicated by various sector bodies as listed above to ensure that any security plans remain relevant, current and fluid. This can be achieved through Action Counter Terrorism accreditation and training which allows the Town Council to access the latest security updates and training requirements in a real-time format via the ACT App which is accessible to staff who have completed the ACT Awareness Training.

A2 - Audit Trails

All Security Plans and any subsequent advice and recommendations provided by external organisations shall be documented and retained.

A3 - Embedding a Culture within the Town Council

The Town Council shall work to ensure security behaviours are adopted by the workforce and the need to retain awareness of any terrorism threat and matters that may cause Threat, Risk or Harm. Instilling, through empowerment and training a positive reaction to incident management and awareness which will form part of normal working patterns rather than abnormal working patterns.

A4 - Staff Training & Awareness

The Town Council shall undertake training with its key officers to raise awareness of the threat of terrorism and what to do.

The primary route for training shall be through the Action Counter Terrorism Portal promoted by Government

[ACT Awareness eLearning - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

A register of those completing the course (and subsequent reviews) shall be retained.

In the case of specific events key officers shall prepare and initiate briefings with staff to ensure that roles and responsibilities are clearly defined and documented, all necessary information is provided and clear communications are followed and audited.

A5 - Liaison with personnel with Safety Specialisms

The Town Council shall liaise with the Local Safe Neighbourhood Police Inspector directly, the Events and Licensing Police leads through the Safety Advisory Group and West Mercia Police's Counter Terrorism Security Advisers to determine any level of threat and appropriate security measures that need to be communicated and implemented. Any instructions shall be documented.

A6 - Determine the Level of Risk

There is an overarching necessity to determine the **Threat, Risk & Harm** of an event be it one which is being organised by the Town Council or is to take place on Town Council Land.

Reference will be made to:

- Location of the Event
- Nature of the Event
- Proposed numbers and demographics of those in attendance
- Defined actions contained within the Town Council's various Premises Licences

A7 - Involvement of the Safety Advisory Group

As a matter of course the Town Council's full Events Programme will be forwarded to the Shropshire Safety Advisory Group to determine the level of threat, the need for the level of processes and the involvement of other corporate stakeholders. Any instructions shall be documented.

A8 - Involvement of other Local Stakeholders

The Town Council shall review any activities and seek local involvement with other organisations & partnerships including:

- Community Safety Partnership
- Team Shrewsbury
- Various Regulatory Departments within Shropshire Council including but not limited to Licensing, Public Protection, Highways & Planning

Any instructions shall be documented and reviewed.

A9 - Review the key components of an Event

In organising an event the key point of contact for advice and guidance is the Purple Guide. Shropshire Council has produced a guide which sets out the key requirements [guidance-for-event-organisers-nov-2020.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/guidance-for-event-organisers-nov-2020.pdf). This shall form the basis and layout for not only its own events but those of others wishing to use Town Council Land.

A10 - Health & Safety At Work Act

The Town Council shall be mindful of its duties under the Health & Safety at Work Act

A11 - Liaison with Event Organisers

Officers shall liaise with organisers of events on Town Council land to ensure that they have embedded any potential terror threats within their Event Management & Safety Plans and shown how they have addressed any threats with appropriate and reasonable mitigating measures in conjunction with the Safety Advisory Group and its respective partners and other external agencies with specific responsibility for public safety and national security.

A12 – Review Security Measures

It is essential to regularly review and exercise plans to ensure that they remain accurate, workable and up-to-date.

Policy Review

This policy shall be reviewed by the Recreational & Leisure Committee annually.