



## TECHNICAL INFORMATION SHEET 47

### MANNED SECURITY GUARDING

#### Background

Operators in the gases industry routinely store, distribute and use dangerous goods, mainly gases, but are also likely to have a variety of other necessary substances within their inventory. As is common with all businesses they will have many other (valuable) assets on their sites, as well as the safety and welfare of their employees to consider.

It is a requirement that their premises shall be kept secure. There are various legislative and best-practice requirements for this, including:

- The *Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations* (CDG) <sup>[1]</sup>;
- European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) <sup>[4]</sup>;
- The *Control of Major Accident Hazards Regulations* (COMAH) <sup>[6]</sup>;
- The *Construction (Design & Management) Regulations* (CDMR) <sup>[5]</sup>.

Industry bodies also provide best practice information for security. This includes:

- British Compressed Gases Association (BCGA) Code of Practice 40 <sup>[7]</sup>, *Security requirements for industrial, medical and food gases*.
- European Gases Industry Association (EIGA) 922 <sup>[8]</sup>, *Site security*.
- EIGA 925 <sup>[9]</sup>, *Security guarding guidance for EIGA members*.
- EIGA Security Alert 25 <sup>[10]</sup>, *Disposal of surplus and used company clothing*.

One of the options by which operators may help secure their sites is through the use of guarding, i.e. the physical presence of one or more security-purposed guards.

#### Known limitations of security guarding

Site operators (i.e. gas companies, operators of gas company sites and other BCGA member organisations) should be aware that:

- having security guards on site does not guarantee a zero level of theft or intrusion;
- security guards may themselves be vulnerable to assault, injury and intimidation;

- security guards will require managing in order to obtain a consistent and effective service;
- security guards should be used to complement the site risk management processes, not as a substitute for these;
- security guards should never be used in the absence of a suitable and sufficient Security Vulnerability Risk Assessment;
- security guards may be employed on site, may have a roving role, or may be employed remotely (for example, at a centralised surveillance or closed circuit television (CCTV) control centre).

### **Specification of requirements**

Site operators shall have a clear specification and understanding for:

- the role that the operator requires of the security guard(s);
- the limitations of security guarding;
- the operator's exact day-to-day expectations of the security guard(s), including clear prioritisation of action and responsibility where the guards are expected to undertake more than one task;
- how the guarding philosophy operates in conjunction with other security vulnerability risk management measures;
- the site operator's requirements in terms of oversight, management and coordination of the security guarding regime;
- implementation of the on-site crisis plan, including internal and external communications, for example, if there's an incident and the media arrive on site;
- the risks and obligations brought about by the use of guards, and duty of care of the site operator to the guard(s).

The site operator's specification shall be in writing. Security guards shall not be used unless such a specification is in place.

### **The purpose of security guarding**

Different premises operators and different sites may have individual needs in respect of security guarding. Typically these will be, in order of importance (most important first):

1. maintain a security profile (for example, a visible presence on site) in order to deter intrusion and crime from those off-site (or, to displace such acts to a less well-secured premises, site or organisation);
2. assisting with access control and access management to / from site, or to / from specific parts of site, in order to facilitate good security;

3. immediate challenge in the event of hostile reconnaissance / intrusion / suspicious activity, thereby helping to offset a potentially more serious outcome;
4. fence-line, premises, perimeter and / or gate patrols;
5. monitoring of CCTV and other non-direct / partially - or fully-remote site surveillance;
6. help satisfy external and Regulatory demands (for example, as imposed by COMAH <sup>[6]</sup>, CDG <sup>[1]</sup>, ADR <sup>[4]</sup> and local counter-terrorism offices).

NOTE: Guarding on its own is unlikely to be sufficient for this;

7. ancillary and potentially site-specific activity benefits such as administration support, weighbridge operation, gate operation, non-lone-working justification, evacuation marshalling, invacuation marshalling, first aid support, escorting visitors, delivering site inductions, etc. in so far as these tasks facilitate and complement good security management;
8. feel good and comfort value for the site, organisation, managers, co-occupants, neighbours, etc.;
9. provide a ready focal-point for communication and escalation for security events.

NOTE: The security guard may be engrossed in an incident and may well not be able or best placed to fulfil this role. Operators need to consider this carefully.

### **Making the decision on security guarding**

The need for security guarding is determined via a security vulnerability risk assessment (SVRA).

For small sites with a limited inventory and with few local security concerns, security guarding may be an unnecessary expense. Indeed, in some cases it may be a counter-productive provision as it may draw the attention of hostile and criminal elements, where otherwise they may be unaware of the value of the site.

For larger sites (especially those which come within scope of COMAH <sup>[6]</sup>) then security guarding is much more viable and more common, on the basis that an equivalent level of security would be extremely expensive to obtain, for example, through an integrated suite of remote monitoring and call-outs.

It is important to regularly review the SVRA and keep it updated. Any security event, new concern or Near Miss should prompt a review, including those experienced on nearby or similar premises.

It is not the purpose of this document to provide rigid criteria for decision making in respect of the necessity of guarding, as different decisions and justifications will apply for sites, depending on specific circumstances. Indeed, the advisability of providing security guarding may vary from time-to-time even on the same site. Individual circumstances may include:

- the time of day (for example, daytime or night-time shifts);

- vehicle / stock / inventory held or moved on and off site;
- other site (or nearby) activity and premises;
- the short or long-term nature of the demand for security;
- the level of presence or absence of other site occupants;
- different parts of a site, which may have specific security requirements;
- temporary and local risk-modifying events.

### **Selection and maintenance of arrangements**

Where a decision is taken to use security guards, they shall be recruited and their activities maintained in accordance with:

- the site's operator's written specification;
- the SVRA (which should be regularly reviewed);
- on-going changes.

As well as a SVRA, the use of security guards will require a risk assessment to cover their role and safety on site. For example, consideration should be given to personal protective equipment, lone working, first-aid, emergency scenarios, communication, welfare provision, etc.

All hired / contracted security officers shall be Security Industry Authority (SIA) licenced. Security officers shall be required to display the license while in course of their duty.

Provided license copies should be checked via the SIA website to ensure accreditation is correctly registered etc. [www.sia.homeoffice.gov.uk](http://www.sia.homeoffice.gov.uk)

Site operators may opt to employ their own security guards, or may contract a service via a specialist third-party.

Security guarding arrangements shall cover the whole foreseeable range of operating conditions, including cover for rest breaks, holidays, sickness and other planned or unplanned absences.

NOTE: Many security contract specialists offer little more than an approved person scheme and the services of an employment agency. It is not possible to simply 'buy security'!

Ensure that any such third party is:

- a true security specialist;
- reputable;
- a member of one or more relevant security trade associations, for example, the British Security Industry Association (BSIA);

- accredited to a recognised quality management system, for example, BS EN ISO 9001 <sup>[15]</sup>, *Quality management systems. Requirements*;
- familiar with applicable standards, as determined by the site operator, for example:
  - BS 7499 <sup>[11]</sup>, *Static site guarding and mobile patrol service. Code of practice*.
  - BS 7958 <sup>[12]</sup>, *Closed circuit television (CCTV). Management and operation. Code of practice*.
  - BS 7960 <sup>[13]</sup>, *Door supervision. Code of practice*.
  - BS 7984 <sup>[14]</sup>, *Keyholding and response services*.
- assessed to meet all of the site operator's requirements.

### **Example security guard qualities**

The following are suggested as basic qualities required of a typical security guard. Where ancillary duties are included in the guard's specification, these may modify or add to the points suggested below:

- diligent, alert, reliable and observant;
- conversant with technology to an appropriate extent in line with specification, for example, where necessary to enable operation of CCTV, computers, access control technology and telephony equipment;
- able to diligently follow procedures;
- 'people skills' to the appropriate extent in line with the specification, for example, to enable positive interactions with colleagues, contractors, bona fide and non-bona-fide visitors, etc.;
- literate and numerate to a standard suitable for their role and responsibilities;
- sufficiently fit, active and confident to meet the role specification and respond appropriately to security threats, events, suspicious persons, etc.;
- sufficiently fit, active and confident for all aspects of the role, including non-routine events;
- sufficient risk awareness and judgement to respond appropriately in all foreseeable situations, for example, by backing off in aggressive situations, by taking appropriate action (such as seeking assistance), etc.

In addition to the qualities expected of prospective security guards, site operators shall provide a detailed and thorough induction programme for each security guard on commencement of their duties. This is essential to ensure that the security guard has a comprehensive understanding of the risks and threats facing the site, many of which will be unique to the gases industry and indeed to the site. Induction material shall be revised, refreshed and re-deployed from time to time.

## Specific and detailed points

### 1. Equipment

The operator shall clarify responsibility for equipment provision in their specification for security guarding requirements. This may include:

- the assessment, provision and maintenance of personal protective equipment (PPE);
- the requirements, provision and maintenance of corporate clothing (refer to BCGA CP 40 <sup>[7]</sup> for onward management of items with logo identifiers);
- other required items such as communications equipment, torches, lone-worker equipment, gas monitors, etc.

### 2. Use of animals

Dogs may be considered for assistance with security patrols and similar activities. To date, the use of dogs has not been common across the industry.

NOTE: Specific hygiene standards may apply around sites (for example, near to medical products, bio-stores, etc.) which may require specific management if animals are introduced.

### 3. Legislation

All those undertaking security duties will need an awareness of applicable legislation and an understanding of the limitations of the actions they are allowed to take. This may include:

- when physical force may be allowed to be used;
- awareness of authorities who might turn up and have the right to demand unfettered and immediate access, for example, the *Health and Safety Executive (HSE)*, the *Competition and Markets Authority (CMA)*, *Her Majesty's Revenue and Customs (HMRC)*, etc.;
- awareness of their responsibilities if persons are detained, for example, whilst waiting for the Police to arrive.
- awareness of the personal data they can request and store, for example, compliance with the *General Data Protection Regulations (GDPR)* <sup>[3]</sup> and the *Data Protection Act* <sup>[2]</sup>.

### 4. Communication

Each site should have clear written guidance on how security information is communicated. Specifically how Security Guards communicate with management on (and off) site, as well as with external authorities or the media. This may include:

- routine communication with on-site management;
- routine security briefing provided to on-site staff, as well as visitors;
- crisis communication with on-site and off-site management;

- Emergency services, for example, the Police, the Fire and Rescue Service, Ambulances, etc.
- Authority bodies specialising in security, for example, Counter-Terrorism Officers;
- other Authority bodies, for example, HSE, CMA, HMRC, Local Authorities, etc.
- the media;
- neighbours.

### References:

1. SI 2009 No. 1348, *The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations* (as amended).
2. The Data Protection Act 2018
3. General Data Protection Regulations (GDPR).
4. European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) (as amended).
5. SI 2015 No. 15, *The Construction (Design & Management) Regulations* (CDMR)
6. SI 2015 No. 483, *The Control of Major Accident Hazards Regulations* (COMAH).
7. BCGA Code of Practice 40, *Security requirements for industrial, medical and food gases*.
8. EIGA 922, *Site security*.
9. EIGA 925, *Security guarding guidance for EIGA members*.
10. EIGA SA-25, *Disposal of surplus and used company clothing*.
11. BS 7499, *Static site guarding and mobile patrol service. Code of practice*.
12. BS 7958, *Closed circuit television (CCTV). Management and operation. Code of practice*.
13. BS 7960, *Door supervision. Code of practice*.
14. BS 7984, *Keyholding and response services*.
15. BS EN ISO 9001, *Quality management systems. Requirements*.

### For more information:

UK Legislation	<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>
Health and Safety Executive (HSE)	<a href="http://www.hse.gov.uk">www.hse.gov.uk</a>
Competition and Markets Authority (CMA)	<a href="http://www.gov.uk/cma">www.gov.uk/cma</a>
Her Majesty's Revenue and Customs (HMRC)	<a href="http://www.gov.uk/hmrc">www.gov.uk/hmrc</a>
Security Industry Authority (SIA)	<a href="http://www.sia.homeoffice.gov.uk">www.sia.homeoffice.gov.uk</a>
British Standards Institute (BSI)	<a href="http://www.bsigroup.co.uk">www.bsigroup.co.uk</a>
European Industrial Gases Association (EIGA)	<a href="http://www.eiga.eu">www.eiga.eu</a>
British Compressed Gases Association (BCGA)	<a href="http://www.bcgaco.uk">www.bcgaco.uk</a>
British Security Industry Association (BSIA)	<a href="http://www.bsia.co.uk">www.bsia.co.uk</a>

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