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CIA | Chemical
Industries
Association

Working for chemical and
pharmaceutical businesses

Maintaining security in chemical businesses

Security update from the Chemical Industries Association

This is one of a series of occasional safety and security alerts by CIA. Its aim is to raise awareness in chemical and other major hazard businesses of the current security situation, some aspects of which could affect your business, and to highlight where the latest advice and guidance can be found. Businesses are strongly advised to remain aware of and use this guidance to help maintain the security of your people, assets and commercial interests.

CIA and
security...
what we do



Provision of security advice is an important part of CIA's work for chemical and pharmaceutical businesses to keep members updated. Furthermore, security is an integral part of Responsible Care by which businesses undertake to manage responsibly. On behalf of its members CIA maintains an ongoing liaison with the security services, and with the appropriate government departments, in order to keep up to date with the latest security developments and guidance. Phil Scott (scottp@cia.org.uk) is CIA's Head of Safety and leads on security, including coordinating the provision of information and advice to member companies.

Security threats to business can come in a variety of forms. These include risks that may lead to potentially serious major incident consequences from the targeting of major hazard inventories on site by terrorists; 'cyber' threats to information held electronically (in your I.T. systems) and targeting commercially confidential information; and more conventional challenges to site security arrangements by people targeting theft of valuable metals and equipment. Some businesses manufacture substances for sale and supply that would be of interest to terrorists, as ingredients for weapons or bombs – for example explosives precursors. The supply of such substances is strictly controlled, and companies need to be vigilant in this area too. The source of each of these threats can potentially come from outside, via people unconnected with your business, or from 'insiders' who try to infiltrate your business and work from inside to pursue criminal aims. In each case there is a wide range of advice and guidance available, which is kept updated, and which is intended to help companies make security breaches as difficult as possible. It is essential that full use is made of the guidance as part of the efforts to manage security risks and to keep businesses protected.

Risks to
businesses



Responsible Care 2014
25 years
of success in the UK

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Threat Level

As part of its counter terrorism strategy, the UK operates a Threat Level system through which the security services advise of the relative likelihood of an attack within the UK. The Threat Level changes in response to security intelligence and is intended as a broad indication. Companies should maintain arrangements within a security plan irrespective of the current Threat Level, but the level is an important indicator of the degree of concern at any one time.

The current Threat Level in the UK (updated September 2014) for international terrorism is 'SEVERE' – this means that an attack is highly likely. It should be noted however that whatever the national Threat Level, the actual likelihood depends on a number of other factors including location. Businesses will be aware from media reports as well as actual events that the 'high risk' areas for many years have been the aircraft industry, large public transportation systems, and financial infrastructure. **Currently CIA has not been advised of any specific intelligence of threats to the chemicals and other major hazard industry sectors.**

Current international terrorist threats

The international threat to western (including UK) interests from the militant network Al Qaeda has been well documented for many years, and remains a concern to the security services. During 2014 however a new threat has emerged and taken prominence in the media, and which has raised fresh concerns about potential future impact on the UK. This comes from the Jihadist group operating in the Middle East and known variously as ISIS (Islamic State of Iraq and Syria), ISIL (Islamic State of Iraq and the Levant), and more recently simply the Islamic State. The particular issue arises from the number of disaffected UK citizens who have reportedly travelled to the Middle East to join the Islamic State conflict. The concern is that when eventually these citizens return to the UK they will bring their disaffection with them as they re-integrate into UK life – and into businesses. This places an increasing challenge on the chemical sector. We reiterate that there is no current information about particular threats to the chemical industries – but given the new developments internationally and the obvious potential for harm from hazardous substance manufacture and storage, it is essential that companies

The Threat Level is given on a 5-point scale, as follows:



an attack is unlikely



an attack is a possibility, but not likely



an attack is a strong possibility



an attack is highly likely



an attack is expected imminently

Further information on the system and the current Threat Level can be accessed from the security service website from the following link: <https://www.mi5.gov.uk/home/about-us/faqs-about-mi5/what-is-the-current-national-threat-level.html>

manage their personnel security measures extremely thoroughly to help prevent the 'insider' possibility. Security services will be monitoring known individuals for the foreseeable future (reported on television as 'for a generation'), but chemical businesses including CIA members can play their important part by following the recommended personnel security guidance signposted (see below under CPNI).

Because of the potential consequences from inventories of some hazardous substances that companies store and use, businesses need to be equally vigilant against security threats as they are in preventing potential accidental release and consequences. Management of major hazard risks is regulated by the Control of Major Accident Hazards Regulations (COMAH). There is no specific link in COMAH to security,

Security overview & COMAH



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however it is implicit that good security is part of preventing loss of control and loss of containment of major hazard inventories. The key message is that organisations need to manage hazardous substances effectively and responsibly so that harm is prevented from whatever cause – accidental or security-related.

CIA is aware that the imminent changes to the COMAH 2015 Regulations resulting from the revised Seveso III Directive, and specifically in the area of provision of information to the public, has raised concern in many companies about the impact this could have on security. We know from our own regular contact with the security services and with the Health and Safety Executive that these concerns within our industry are fully and properly recognised; whatever shape these aspects of the final COMAH 2015 Regulations take will be on the advice of the security services, and with the minimum necessary for the UK to meet its legal obligation to implement the Seveso Directive. CIA will keep member companies fully informed about these developments as they arise in the lead up to June 2015 and the new COMAH Regulations.

within your business, including:

- **General advice;**
- **Physical security** (<http://www.cpni.gov.uk/advice/Physical-security/>) – measures to prevent a direct assault on premises or to reduce the potential injuries and damage that can result should an incident occur;
- **Personnel security** (<http://www.cpni.gov.uk/advice/Personnel-security1/>) – policies and procedures aimed at managing the risk of staff exploiting legitimate access to an organisation's assets or premises for unauthorised purposes ('Insiders'). This covers arrangements including recruitment, pre-employment screening, document checking, line management, maintaining an effective security culture;
- **Cyber security** (<http://www.cpni.gov.uk/advice/cyber/>) – protecting the confidentiality, integrity and availability of information whether held as electronic data or by other means, from theft or attack.

The range of detailed guidance is too broad to cover in detail in this note, but companies are strongly advised to use the CPNI website and to ensure the guidance is fully familiar to appropriate staff in your organisation, and that your security plans are updated to take account of it.

Sources of information and guidance

The primary sources of advice and guidance on security for major hazards and other businesses are from the Centre for Protection of National Infrastructure (CPNI) which is part of the security services, and the National Counter-Terrorism Security Office (NaCTSO).

CPNI

CPNI is tasked with protecting UK national security by providing protective security advice covering physical security (including site/buildings security), personnel security, and cyber security. CPNI works closely with a range of relevant government departments, with the police and NaCTSO (see below), with security equipment manufacturers, and with industry. The relevant sectors it covers include amongst many others business, energy, transport, and finance.

CPNI maintains a comprehensive range of up-to-date and freely accessible guidance on its website – please see the following link: <http://www.cpni.gov.uk/advice/>

Documents can be downloaded from this site that give detailed information on the steps you can take to manage security risks

The National Counter Terrorism Security Office is a police unit working alongside CPNI. Amongst other functions, NaCTSO supports the network of specialist police known as Counter Terrorism Security Advisors (CTSAs) that many companies will be familiar with from CTSA visits to their COMAH sites. Part of NaCTSO's responsibility covers hazardous sites and dangerous substances – including security of explosives and precursor chemicals, fertilisers, pathogens and other toxic chemicals, and radiological sources. CTSAs work closely at the local level with major hazard sites to review security provision and provide advice to companies on maximising cost-effective protective measures.

The NaCTSO website, as with CPNI, contains a wealth of information including a specific section on hazardous materials, which can be accessed through the following link: <http://www.nactso.gov.uk/hazardous-materials>

NaCTSO

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NaCTSO also has comprehensive guidance (currently in Draft) on 'Counter-Terrorism Security Advice for Hazardous Sites' that is particularly relevant for many CIA member sites. CIA has worked (and is continuing to work) with NaCTSO on the preparation of this guidance – although it currently remains in draft form, it is available from the CIA website and contains much valuable information and guidance on managing security risks and protective security advice:

<http://www.cia.org.uk/Portals/0/NaCTSO%20Security%20advice%20for%20Hazardous%20Sites%20-%20August14.pdf>

CIA will ensure that as this important document is revised and updated, we alert members to it. We strongly recommend that companies review its content and advice in the context of your own sites and procedures.

Controls on explosives precursors

Explosives precursors are chemicals that may be used in the illicit manufacture of explosives. Access to these chemicals outside legitimate business use has been controlled for some time, and further restrictions are in place from 2nd September 2014. The Control of Explosives Precursors Regulations 2014 require home users of substances on Annex 1 of the EU Regulation 98/2013 (above certain concentration thresholds) to obtain a licence from the Precursor and Poisons Unit at the Home Office. Retailers will also be required to indicate that possession, acquisition and use by the general public is restricted on the product label.

Business-to-business transactions fall outside the scope of the new licensing requirements. However it is now mandatory for all suspicious enquiries, and significant losses and thefts, relating to an extended list of prescribed chemicals to be reported to the police. Most of the chemicals caught by the new concentration thresholds are used in many consumer product formulations (for example hydrogen peroxide, chlorates, perchlorates and others). For the Guidance on this published in August 2014, the full list of licensable and reportable substances, the concentration thresholds and details of Home Office contact points visit:

<https://www.gov.uk/government/publications/supplying-explosives-precursors>

Many chemical businesses nationally, as well as many other organisations including transport infrastructure, have suffered for many years from periodic security breaches at sites targeted at theft of valuable metals and equipment. The protective security measures recommended to deter potential terrorist intrusion (including for example security personnel patrols and procedures, fencing, lighting, closed-circuit television etc) should be equally effective in keeping out, or at least deterring, thieves. In response to rising levels of metal theft, government action aimed at introducing better control of the outlets for sale of metals resulted in new legislation recently – since when, reports to CIA of the incidence of security breaches leading to metal or equipment theft have substantially reduced. We would be very interested to receive your observations on whether theft from site is still an issue for your site – please address any comments to us at: responsiblecare@cia.org.uk

Security issues and concerns tend to fluctuate; CIA will maintain our ongoing, regular contacts with the security services and appropriate Government departments on behalf of member companies, and we will pass on any relevant information. Companies are advised also to use the information sources noted above to maintain their own vigilance on changing threat levels and the publication of new guidance. If there are any areas which you think we have not covered or where you think we can help further, please send any observations or comments to us at: responsiblecare@cia.org.uk

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Thefts from site

Future monitoring of security issues