

## **Requirements for Establishing a Comprehensive Physical Security Plan for your Facility**

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High rise and large capacity buildings are at risk today more than at any time in our history. With the government putting government buildings on high risk status and making government facilities more difficult to access, Terrorists will look for other targets that meet their requirements. For years we have witnessed this in foreign countries. A few months ago the Department of State put the Embassy in Pakistan on Red Alert and lock down when they received information that the Al Qaeda had plans for an attack. Two American franchise restaurants were bombed instead. These restaurants are owned by Pakistan Nationals, not Americans, but the Al Qaeda received the publicity that they wanted because of American restaurant being symbolic of America and also the added bonus of injuring some of the American Embassy Staff that were eating lunch.

Malls and High Rise buildings offer several targets of opportunity that fit the Al Qaeda mind set. First, they normally have a large number of occupants. Secondly, they can be symbolic of American life, such as the World Trade Center representing Americas Financial might and a land mark of the city of New York. Terrorist groups are looking for something that will be media worthy and will give them the exposure that they desire. The other goal of the Al Qaeda is to disrupt American business. This is where we as American business people can do our part to help with the fight against Terrorism. We can do our jobs so that if there is an attack, the incident causes a minimum amount of disruption to our businesses and the people and businesses around us.

In a statement made in September of last year Bin Laden stated that he would attack our shopping malls, business's and schools. The Al Qaeda has also been recruiting from "disenchanted Americans". It is also known that they have been actively recruiting in the University Environment. The Al Qaeda feels that the young and expressional students could easily be motivated to join terrorist cells giving the Al Qaeda access to restricted areas as well as having individuals that do not fit the Middle East terrorist profile. There have been two arrests made in recent months at two Ivy League schools for providing biological toxins to foreign governments.

Bin Laden thinks of himself as a philosopher and great leader. He has made the statement several times that he would use our technology against us. He did this when by having our military chasing after his satellite phone while he rode his donkey across Afghanistan and into Pakistan. The Al Qaeda has a very good intelligence network that has been put in place around the world. While they stick to the rule that they only use people they know and trust, our hiring laws prevent us from restricting possible Al Qaeda members from our most sensitive areas due to America's non discrimination laws.

With these facts being commonly known, it is impossible for a Facility Manager to claim that they did not know that their facility could be at risk. This brings us to what we need to know to address the threat.

In recent months after the 9 11 incident I have had many conversations with Facility Managers that have found themselves thrown into a situation that they have not had to face in the past. Protecting against Terrorist incidents was not in their job description when they were hired.

While many of the precautions are the same as you would take for a fire or natural disaster, there are also many differences.

Speaking to Facility Managers across the county I have found that most do not have a strong background in Counter Terrorism and must reach out to their contacts to assist them. Most went to their security directors or guard supervisors for assistance. While some of these people are very knowledgeable about their individual security responsibilities, few have any experience with Terrorism and most of the experience that they have is not current or relevant to deal with the current Middle East threat involving Biological, Cyber and Physiological Terrorism.

You must insure that the person that assists you with designing your facility emergency plan has Counter Terrorism knowledge and not just security, law enforcement or fire department experience. You need to retain a consultant or consulting firm that has extensive experience with the new Terrorism laws and regulations. You may wish to view the web site for ASIS International, the largest security association in the world to assist you with locating resources and assets. [www.ASISonline.org](http://www.ASISonline.org) They have councils on all areas of security to include Information Technology, Terrorism, Disaster Management, Physical Security and many more.

The first step in protecting your facility, staff and occupants is having a comprehensive Vulnerability Survey completed. Here again, this needs to go far beyond the surveys that you have had performed in the past. As with your previous, surveys you will need to take into consideration the grounds, and building layout, perimeters, utilities, physical layout, lighting, telecommunications, all points of entry and egress. Badging and Identification Systems, vehicle access, any high points of risk that you may identify, security guard service, security monitoring service, security alarm system, building hardware and key control.

Then you can start to work on your survey that will develop into a comprehensive survey, policy and plan. There are several points that must be identified to the survey auditor. They will need to know the location of your check writing equipment, mailroom, and mail reception and sorting areas. They will also need to know the exact property boundary. Auditors should be provided with a sited plan with a minimum of ground floor or any level that has ground access.

They will need to have access to the property and be able to see everything. They will need an escort and access to the building at night and on weekends as well as business hours. If they conduct the survey correctly, they will be on site for two to five days and it is imperative that night and weekend lighting and traffic evaluations are conducted. They will need to know what security procedures change during evening and weekend operation as well as the power and heating and air changes during off peak times.

They will need to have access to your current crisis management plans as well as evaluating your existing response and disaster plan, telecommunications emergency procedures, Proprietary Information protection plan, Information Technology and Computer Vulnerability Analysis, HIPPA Compliance, Bioterrorism Preparedness Response Act, USA Patriot Act, THE ANTI TERRORISM and EFFECTIVE DEATH PENALTY ACT OF 1996, Public Health Security and Bioterrorism Preparedness Response Act of 2002, H.R, 3448, The USA PATRIOT ACT, CFR 42, CFR 49. If your organization has Bio Toxins, you must have been in compliance by 1 October, 2002. One of the biggest new laws under the Bio Terrorism act is the mandatory background investigations. If you have a person that has a criminal history in violation to the Bioterrorism Preparedness Response Act of 2002, it carries the fine of \$500,000 for the facility. This fine could be for things as simple as having an employee with a dishonorable discharge, a felony conviction or even being on bond of a major crime. The best company that we have found

for conducting accurate criminal history searches is Phoenix Research from Cincinnati Ohio. ([www.HRLiability.com](http://www.HRLiability.com)) This company actually sends people to the courthouse to check the records and does not rely on data bases that statistically run about an 19% error rate. I have found that we cannot pay for the parking at the courthouse for what these people charge to conduct the search. For additional information on what is required to comply with many of these Acts you may request information form Office for Regulatory Audit and Compliance at [www.ofrac.com](http://www.ofrac.com) .

It is very important that the consultant assisting you has experience with the new HIPPA, GRAMM LEACH and BIO TERRORISM ACTS so that you do not incur the fines and prison time that come with non compliance. Another certification that may indicate a higher level of knowledge in the Terrorism Response field is the CAS. The Anti Terrorism Accreditation Boards (ATAB) Certified Anti-Terrorism Specialist or CAS designation is awarded to individuals that complete a study course or procedures required to respond to a terrorism incident and passed a written and practical test. You can find more information on the CAS and MAS at [www.4cas.org](http://www.4cas.org) .

The importance to the Facility Manager in locating a knowledgeable consultant stems from the severe punishment for non compliance to some of these new regulations. The fines for non compliance to the Biological Toxin possession and storage laws are a \$500,000 fine for the Facility or organization and \$250,000 fine for the individual in non compliance. If you have leased space to a research or medical firm, it is imperative that you know what is taking place in your facility. You could end up being fined without even knowing that your renter was involved with the above research. If you would like a list of the Toxins that fall under the above act you may request the list from [www.goIDRC.com](http://www.goIDRC.com) .

### **Reducing the Threat**

The biggest problem that I have seen in my career of implementing security and safety programs has always been having the Corporate Executive approve the funds. I heard a security director from IBM make the comment after having some employees killed that *“No amount of money can be spent to prevent a problem that will come close to what you will spend afterwards to clean up after one.”* With the current state of unrest, most businesses realize that they have a legal obligation and duty to protect and secure their employee’s and clients. This should make it easier to sell your security plan to management but you still need to be practical with your plan.

In the past most of us relied on government agencies to react to an emergency situation such as the fire department or HazMat teams. Now we must take actions to be in control of our own destiny. As we learned from New York and Washington, the government resources will be used up and worn thin and if we plan on returning our business back to business as usual, we must be prepared to handle many of these situations with our own resources.

The corporation not only has the legal and moral responsibility to their employee’s they also have to answer to the stockholders about not only what they spend but also why the business is not up and running again in a timely manner after an incident. For our businesses to survive a catastrophic event, we must insure that we save as many of our assets as possible and return the business back to operation as soon as possible. With the terrorist attempting to disrupt our business, it is our responsibility to see that we do our jobs and not only save lives but keep our businesses working as smoothly as possible.

Surviving a Terrorist incident is much more than just a security matter. It should be considered in all of your contingency plans and take into account your vulnerabilities and the threat to your

facility. The best way that we can do this is to be sure that our employees are trained in what to do in crisis situations. This is to include preemptive actions such as searching the building for a bomb and responsive actions such as searching your facility for survivors.

Your contingency plan must take all of this into consideration and start with the most important initial training and that is first aid. We need to have basic first aid training available to our employees on a large scale. Depending on your security department for administering first aid could mean the difference in some of your employees living or dieing. Your security department, if they survive the initial attack, will undoubtedly be occupied with evacuating personnel, directing emergency response and coordinating with Facility Management to cut off utilities and other major hazards and risk. The disaster plans that were developed two years ago are no longer effective or appropriate for today's threat. You can contact the American Red Cross about first aid training at [www.redcross.org](http://www.redcross.org).

Another critical item to have available in a crisis is an Automated Electronic Defibrillator or AED. The New England Journal of Medicine stated that the chances of surviving Sudden Cardiac Arrest are 92% greater if defibrillated within the first two minutes after suffering SCA. There is legislation pending in 19 states to make these devices mandatory in all government and public buildings. You can read more about this on the Heart Help web site. You will also find that not having Defibrillators available has already been the cause of several civil suits in cases where clients or employees have died from SCA.

One of the main considerations in beginning the healing process after an incident is how the public and your employees perceive that your company is prepared to deal with the problem, take care of their people and get back to business as usual.

The most critical part of any emergency plan is how to take care of your employees and their families. If there is a chance that your employees families are at risk, it will be hard for you to have your critical employees show up for work. Your employee's families need to be taken into consideration when developing your plan.

After offering first aid training you need to insure that there is a working evacuation plan and insure that the plan functions. Insure that evacuation routes are clear and not obstructed by locked doors or blocked by parked vehicles. Do you have adequate first aid supplies? Do you have Decontamination kits available? Do you have disposable clothing available in the case of mandatory decontamination? Do you have an off site number for your employees to report into after a crisis? Do your employees know the emergency number to call? Do you have a plan to route communication lines to other location so that business can continue? Have you contracted in advance with local hotels or businesses to insure that you have locations to work from if something would happen to your facility? Do you have a method to backup your data or have your data reinstalled so that you can continue with business? Have you made arrangements with a cell phone company for a block of numbers that your regular phone lines can be forwarded to in an emergency? Have you made advanced arrangements for additional security to report to your facility during a crisis? Does your security staff have training in the proper procedures to preserve evidence? If you have a terrorist event, it is also a crime scene and there may be items on the scene that could mean the difference in obtaining identification or conviction of a perpetrator.

These are just a few of the things that must be taken into consideration when developing a contingency plan. There are companies that specialize in developing these plans such as IDRC. You can download information on recovery plans from [www.goIDRC.com](http://www.goIDRC.com) .

It is essential that for your business survival to have a quick recovery. It has been shown in recent cases that a speedy and efficient recovery has actually boosted stock value. Your plan must not only be functional in evacuating your business and getting the business back to work, it must also be seen by the public as being well planned and organized. The quicker you can implement a comprehensive plan and begin conducting business under that plan, the better your chances of having a successful recovery and return to business as usual.

## IN CONCLUSION

First we must assign the proper personnel to develop your crisis management plan. Then we must insure that a Comprehensive Vulnerability Survey is designed for your business. After conducting a vulnerability assessment, you must then develop a crisis management plan. As an average sized business at one location, you can expect to pay between \$15,000 and \$25,000 for a competent company to conduct your audit and supply you with the crucial data needed to develop your plan. Every business is different if nothing more than geographical location and the time needed for the response team to arrive. Due to the uniqueness of each business or location, you will not be able to use a total boiler plate crisis management plan. While some things will remain the same, others will have drastic changes. When the smoke clears and after the pieces are picked up, we must then be able to defend ourselves from the civil suits that will surely follow. The best defense against these suits will be the fact that you did not take short cuts that caused injuries or lives. Conduct your survey, develop your plan, distribute your policy and train you employees.

Keith Flannigan is the Executive Director of an Investigative and Crisis Management agency specializing in Counter Terrorism, Communication and Information security. Mr. Flannigan designs Security and Response programs for Client Firms with known security risk. Hostage Recovery and Prevention as well as Information and Communication Security programs are designed for client firms and conducting certified Technical Counter-Measures on client communication and computer systems.

Mr. Flannigan has 28 years of experience in the Law Enforcement and Intelligence Fields. He has written and instructed Law Enforcement curriculum on Technical Surveillance, Crisis Response, Cyber Terrorism, Responding to a Terrorist Incident, and Managing a Bio Chemical Incident for county and state academies and the Federal Law Enforcement Training Center. For nine years he was an instructor at a police academy charged with developing in instructing training in all of the investigative areas from organized crime to crime scene investigations. Mr. Flannigan has instructed classes at Universities on Terrorism and Cyber Terrorism since 1995. Mr. Flannigan was named Counter Terrorism Professional of the Year in 1998 by the Counter Terrorism EXPO. He has completed 4 State and Federal academies, minored in Criminal Justice holds a PhD in Political Science and has completed over 3,200 hours of Law Enforcement Training.