

Committee Audit and Risk Management	Dated: 17 July 2018
Subject: Deep Dive: CR24 Operational Security Update	Public
Report of: Town Clerk	For Information
Report author: Richard Woolford, Strategic Security Director and Counter Terrorism Advisor	

Summary

This Corporate Risk has been included in the risk register due to the need to ensure that the security infrastructure across the City Corporation Estate and the security culture within the organisation is robust to evolving threats.

Effective protective security requires the integration of physical, personnel and people, and cyber security measures (this later threat is the subject of a further report on CR16). There is almost always a human element (direct or indirect) at a point of security failure. This strategic risk reflects issues for which the City of London Corporation has both primary responsibility and control. This review has focused on: governance, staff, training and preparedness of the City of London Corporation and its delivery departments to mitigate this.

The risk is owned and managed by the Town Clerk, as good security protects the People and reputation of our organisation.

Introduction

- 1 This Corporate Risk should be considered among the backdrop that the threat from International Terrorism remains at 'Severe', meaning an attack is highly likely. It has been at this level since August 2014; in 2017 the threat level rose to 'Critical' twice meaning an attack is expected imminently.
- 2 The United Kingdom was attacked three times in ten weeks; 22nd March in Westminster, 22nd May in Manchester and 3rd June at London Bridge. This level of Islamist extremism in the country is unprecedented, with 35 people being murdered and 217 injured in these attacks.
- 3 The target locations of all three attacks were crowded places, populated by civilians going about their day to day lives at tourist locations or social venues, representative of Western life. The attacks seemed timed to ensure maximum casualties, with civilians being indiscriminately targeted, regardless of age, sex, religion, ethnicity or nationality.
- 4 International Terrorism currently is the biggest terrorist threat to the City of London, with attack methodology being as fluid and diverse as it is, in who

would carry out such attacks. With pre-planned directed attacks being carried out by organised groups as well as inspired lone individuals. The current attack methods used shows, layered attacks, with the use of a vehicle as a weapon being the initiator of the attack, followed by low level non-sophisticated weapons, such as: knives, hammers and recently petrol bombs. Firearms cannot be ignored although military grade ammunition is more difficult to obtain.

- 5 The use of explosives also cannot be ignored; especially with the awareness and ease of purchasing components to make chemical explosives. As such security enhancements to protect the public realm, our staff and buildings are all still relevant and valid. The step change in terrorist activity is not a minor blip but a clear and substantive change. Our protective measures and planning needs to run parallel to this.
- 6 MI5, the police and partners have together stopped 18 terrorist plots in Great Britain since mid-2013 by the end of 2017, with nine in 2017 alone including five since the Westminster attack in March last Year. At any one time, MI5 and the police are conducting around 650 active international counter terrorism investigations involving 3,000 subjects of interest. In addition to this, there are around 20,000 individuals who have been subjects of interest in previous terrorism investigations.
- 7 With every attack that has taken place or been prevented, extensive hostile reconnaissance has been identified. As such, this is key in the posture for a security culture.
- 8 A lot of the previous working practises around security across and within the Corporation have been based around historical threats from Northern Irish related terrorism (NIRT). The threat level to the UK was lowered to 'Moderate' meaning an attack is possible but not likely on 1st March 2018 after two years at the level of 'Substantial' meaning an attack is a strong possibility. NIRT groups maintain aspirations to attack mainland UK. Splinter groups to PIRA have not engaged in the peace process such as NIRA and CIRA are seeking to undermine the peace process and have moved beyond security service attacks in Northern Ireland. As such this threat can not be ignored.

Context

- 9 The changing nature of the terrorist threat to the Square Mile has seen the development of numerous policies, processes and public realm designs over time to meet that threat. These include:
 - The introduction of the Traffic & Environmental Zone (the 'Ring of Steel'), through
 - The implementation of Hostile Vehicle Mitigation (HVM) and stand-off protection for building developments,
 - Mitigating the threat to the Corporation estate and public in crowded places from 'vehicle as a weapon' attack.

- 10 Strategically, there are limitations to what physical infrastructure can achieve alone, so HVM must only be considered part of the wider Secure City programme. This aims to take a holistic approach to security in the Square Mile: integrating HVM with the City Police's CCTV review, the Joint Command & Control Room project, bespoke to this corporate risk, how Corporation Estate CCTV and Control Rooms will feed into this JCCR concept. Existing National Counter Terrorism police lead initiatives include Project Griffin, Project Argus and future technological developments which aim to tackle counter terrorism and crime & disorder, all need to be considered.
- 11 Previous reports have pointed out that the potential threat to the City's estate, crowded places and pedestrian environment is real and likely to persist in the longer term. However, better security is as much about good process, governance and decision-making as the physical infrastructure. It is essential we establish a process for assessing HVM requirements in a structured and proportional way.
- 12 To reassure members and the Public that the process does not start from the position that HVM can or should be implemented in every street in the Square Mile. Permanent solutions are also risk assessed against temporary bespoke solutions. That approach accords with the concept of security by design, where HVM measures are visible but unobtrusive; rather than create a rigid architectural landscape that might otherwise normalise hard, obtrusive, overtly security-based measures within the City's landscape.
- 13 A recent survey done through Building Research Establishment (BRE) suggested over two thirds of people believe recent acts of terrorism have made them more security conscious when out and about, with over 50% of people being influenced by security when deciding whether to attend an event, work place, concert or festival.
- 14 Our staff, members, public and customers, are representative of this survey. There is public acceptance that not everywhere can be protected, and that disproportionate measures to create a hostile mentality might be unwelcome. It is too easy to focus on HVM measures; it is therefore essential to focus on a proportionate and measured security culture and methodologies to protect our Estate, Staff, Members and the public.

Current Position:

Governance

- 15 The mitigation to this corporate risk is now maturing and new structures and posts are embedded in governance within the organisation. This is led by the Town Clerk and Assistant Town Clerk leading on the Strategic Security Board. This board has Chief Officer representation from across the organisation and

City of London Police. This board sits monthly. There is a Corporate Security Strategy and a risk assessed action plan underneath this. There are delivery boards underneath the Strategic Security Board led by Chief Officers driving change and held to account at the Strategic Security Board.

- 16 The Town Clerk identified a lack of operational and occupational strategic awareness of security across the Corporation, and as such created a new post just prior to the London Bridge attack. The new role of Director of Security and Counter Terrorism, as a strategic advisor and driver of change was created. This post was competitively filled, by the former Commander Operations from the City of London Police.

Security Culture

- 17 People Board, owned by the Director of HR, focuses on: security culture under City Secure 2018, staff roles and responsibilities, security provider contract, training and accreditation and communication. There are representatives from relevant departments on this board, there is a risk assessed action plan monitored by the Strategic Security Board. We are currently awaiting CPNI (Centre for the Protection of National Infrastructure) SeCuRE4 assessment, to carry out a security culture assessment of the organisation and assist in the continual development of an improved safe and secure culture. In the interim we are focusing on the three key people threats: reducing insider risk, optimising people in security and the untapped pool of all staff. This is not just security through staff behaviour change campaigns but also the disruption of hostile reconnaissance.
- 18 A continuing professional development (CPD) programme has been developed for all staff across the Corporation who perform a security function to ensure confidence in the operational and occupational capability of staff in all security-related roles. This CPD programme will initially be rolled out at the Guildhall and then to all other COLC sites. The CPD programme will ensure our security staff exceed industry standards in relation to training, development and understanding of the threat and associated risk mitigation measures. This is supported by the Security Institute with planned affiliation.
- 19 The staff handbook is being updated to embrace the changing needs for the security culture, including training plans and communications awareness.
- 20 New Lanyards have been distributed to enable staff badges to be visible to the front which has been supported by a communications plan. This will develop with new staff badges with COTAG. Centre for Protection of National Infrastructure best practise are being utilised.
- 21 There is a new HR Security Policy currently out for consultation.

Protective Security Corporation Buildings

- 22 Cross-Cutting Board owned by the City Surveyor, focuses on protecting staff and internal estate security enhancements. This is phase one of a continual

review, and there are staged improvement plans to create a safe and secure working environment. There are representatives from relevant departments on this board and the City of London Police. Phase one, has brought together all old and current CTSA (Counter Terrorism Security Advisor) reports, to one Cross-Cutting Board. Its purpose to ensure risk-based decision making balanced with value for money to address the issues raised. It focusses on protection from vehicle borne attacks, with options on HVM that are assessed and meet national standards through CPNI ratings. Some of these projects are to replace antiquated systems which we already have, others are to introduce new ones. We are modernising CCTV and control rooms in addition to maintaining protection for explosive devices with Bomb Blast Mitigation, all assessed to CPNI guidelines. This has been subject to close monitoring through committees.

- 23 The budget initially set has been extended to £16m, addressed in recent Gateway reports. This was due to further essential change requests and additional fees. The finances on this are under strict scrutiny by the City Surveyor. There is a time table for these works.
- 24 The Director for Security and Counter Terrorism has identified other areas, to be addressed and once phase one has been completed, in partnership with CTSA's a detailed review will be carried out and bring to members options to mitigate further risks. Access control of the estate is being reviewed at present with the focus initially on one site with new COTAG access control; once procurement and implementation is concluded this will be rolled out across the rest of the estate.

Protective Security Public Realm

- 25 Public Realm Board, led by Carolyn Dwyer, Director for the Built Environment, focuses on protecting the public, members and staff from terrorist attacks across the public realm of the City of London. There are representatives from appropriate departments and police. There is an overlap with the Cross-Cutting board. The Director of Security and Counter Terrorism, in company with Assistant Director Highways, and police lead for Protective Security continually review locations thought to be of particular risk this includes Corporation assets. They focused on priority of risk basing decisions through the corporate risk matrix then reporting to committees for funding and implementation to mitigate these prioritised threats.
- 26 This Board continually reviews the public realm, considering the changing nature of the City. Its focus as stated earlier is that good security is as much about good process, governance and decision-making as the physical infrastructure. It not only addresses immediate security concerns across priority locations, it also seeks to establish that process for assessing HVM requirements in a structured and proportional way; now and in the future. As such, the Corporation is now creating a resilient pool of reusable portable,

temporary HVM, that can be set up to protect bespoke events, or mitigate identified threats awaiting permanent solutions.

- 27 In addition, it was identified across the Corporation Estate, there was inconsistency of delivery of security provision. Different working practises, standard operating procedures, staffing levels, training and accreditation existed. There was inadequate cross-department engagement, to mitigate threats, share best practise, and provide threat escalation and surge to mitigate threats. An additional tactical board was created, bringing all heads of security from across the estates, with event management delivers and police.

Security Delivery

- 28 The Security Advisory Board, now chaired by the Head of Security for the City Surveyor's has new terms of reference and focus will provide: corporate focus, ownership, visibility, oversight, direction, guidance, coordination to the Corporation operational response in managing current risks and threats. To do this there is now a shared understanding of the current threat environment and the Board are shaping a consistent corporate approach to security across the Corporation estate, including access control and accredited passes. The lack of reporting security incidents is also addressed through this group, now reporting to the strategic board. Lessons learnt from going to critical twice last year have helped to shape this. As such if the threat level changes, systems and processes are in place to agree posture and support each other with surge of assets and other tactical enhancements. This group is currently developing Corporation-wide policies, standard operating procedures and approaches to shaping the delivery of a modern and effective security framework, guard force and culture to counter threats to the City of London Corporation by way of the SAB Working Group, made up of the Head of Security and Security Managers from all major COLC sites, reporting to the full SAB Group. SAB now has a 12-month plan to deliver a series of work streams to further enhance performance in this area.

Command and Control

- 29 There has been an extensive review of command and control of Corporation events, security and management, resulting in a phased training programme, with support from the College of Policing, Solicitor Advocate and accredited Commanders, to provide Gold, Silver and Bronze training across the Corporation.
- 30 An additional post within City Surveyors has been created as Head of Security responsible initially for the Guildhall. Again, this was a highly competitive process now filled, by the former Chief Superintendent in charge of Metropolitan Police Service events and public order.
- 31 The Director of Security and Counter Terrorism and Head of Security have reviewed the event structure and have introduced a risk assessed approach, introducing effective command and control of events, as recently witnessed with Commonwealth Heads of Government Meeting. There is now embedded

within pre-multi-agency exercising and testing and audited debriefs post-events with activity to not only capture learning but to also implement learning. A process is now in place to assess threat, harm and risk associated with all events at the Guildhall and to implement effective and proportionate risk mitigation measures and command teams. This process will be rolled out to the rest of the COLC by November 2018.

- 32 The Corporation now has a pool of trained and accredited loggists, to support planning and incident response that has been expanded.

Guarding

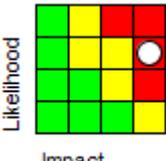
- 33 The corporate security contract is under intense scrutiny over delivery to correct standards and efficiency. The aim is to ensure a professional and proportionate security guarding product across the corporate estate. There is a detailed mitigation plan in place to ensure that when the current contract expires that tendering will have been competitive to meet current and future security needs. In the meantime, the current service provider is being held to account by way of attendance at SAB and through the Security Core Group within City Surveyors. An improvement plan is in place and the service providers are being held accountable for delivery against this plan.

- 34 It is evident that across sites there are differing levels of training and awareness. As such there is a phased programme of training that has commenced, all Corporation Security and front of house staff are receiving and to receive, Project Griffin and Argus training, in addition to detailed hostile reconnaissance training. The emphasis on a partnership approach with neighbours and stakeholders, step outside the curtilage of our buildings and work with others to create detailed areas of effective security, designed to deter hostile recognisance from crime or terrorists. This will fall into the CPD plan for Guarding.

- 35 This is not isolated to Corporation Guarding, there are differing and inconsistent levels across the City from public to private sector, as such Director of Security and Counter Terrorism is now working with Guarding Companies from across London, Police, CPNI and the Security Institute, to scope the concept of a City Security Academy. They have now created a City Security Council, looking at joint risk mitigation.

Conclusion

- 36 In conclusion the current threat and risk matrix shows:

<p>Current Risk Assessment, Score & Trend Comparison</p>	 <p>24</p>	<p>—</p>	<p>Constant</p>
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Likelihood	Possible																									
Impact	Extreme																									
Risk Score	24																									
Review Date	22-May-2018																									
Target Assessment Score	<table border="1"> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> Risk & Likelihood Impact 16																									
Likelihood	Unlikely																									
Impact	Extreme																									
Risk Score	16																									
Target Date	30-Apr-2019																									

37 A lot of work is being done to address this risk. There is improved governance, resilience and drive in place. Until this is embedded we remain at this score at present. It is aspired to reach the target date of 30th April 2019, however continual review and work is mitigating the current risk. The deadline is intrinsically linked to departments delivering activity within time frames, if these are not met the deadline may need to be extended, especially around protective security measures. The work being done has mitigated some of the likelihood risk already.

38 However, we now have auditable work being done to address this that lacked previously. A lot of what is being done is in the Protect side of the National Contest Strategy, we are now shaping the Prepare side with audited table top multi agency exercises and debriefs. With the training started to create a resilient pool of Gold and Silver leads, if an attack takes place, training a pool of loggists, meeting the requirements of the Civil Contingency act 2004.