

Counter Terrorism and Operational Security Policy



The issue of Counter Terrorism is taken extremely seriously, Traction Rail Electrical Ltd. Is committed to ensuring the safety of all staff, Traction Rail Electrical Ltd. guests and members of the public. This policy sets out both the mandatory steps to ensure that we as a company are doing all we can to address the issue of terrorism as well as identifying security threats and steps to minimise any potential threats.

Possible Direct Threats:

Below is a non-exhaustive list that details possible direct threats to organisations and Traction Rail Electrical Ltd's response to how it deals with these direct threats:

- **Organisations that deal with chemicals, explosives, gases or other hazardous substances may be targeted by terrorists:** Traction Rail Electrical Ltd. does not routinely deal with, nor carry chemicals, explosives etc. via its fleet. On the occasions when gases etc. are required for site works the items are securely stored on the vehicles and supported by all of the necessary paperwork etc.
- **Information about organisations that is readily available to the public may be utilised and/or exploited by terrorists:** The Traction Rail Electrical Ltd. website does not reference upcoming jobs or locations, nor does it provide details of the fleet, it's drivers or any other sensitive information.
- **Taking care with assets that may contain potentially sensitive data/information i.e. such as mobile phones. As mislaying these and/or being lax with security may make these assets an easy target for terrorists:** Traction Rail Electrical Ltd. does provide some electronic devices however, they are password protected and identified through a unique reference number – the individual who has signed for said devices is aware that any loss/theft of items must be reported straight away so that the necessary steps can be taken.
- **Organisations that are associated with high profile individual(s), through visitors, sponsors, contractors or a contentious area of work may be directly targeted by terrorists:** Traction Rail Electrical Ltd. does not directly deal with high profile individual(s), visitors, sponsors or contractors that may be identified as targets by terrorists. On occasion work sites in London may be part of Traction Rail Electrical Ltd's planned works, Traction Rail Electrical Ltd. complies with the strict procedures set in place by Network Rail for signing in and out and ensuring the security of worksites, equipment and so forth.
- **Keeping up to date with the current terror risk in the area(s):** Traction Rail Electrical Ltd. is committed to ensuring that the individuals that are put to work are able to work as safely as possible, this includes ensuring that regular checks are made with regards to threat levels etc. and that individuals who work for/alongside Traction Rail Electrical Ltd. are aware of how they recognise terrorist threats.
- **Ensuring that robust and consistent recruitment checks are in place:** Traction Rail Electrical Ltd. prides itself on being a business that is knowledgeable and supportive of its staff and sub-contractors, robust recruitment checks are put in place, moreover the individuals who work alongside Traction Rail Electrical Ltd. are known to all in the management structure.
- **Identifying how vulnerable vehicles are to being stolen or exploited to aid terrorist objectives:** The majority of Traction Rail Electrical Ltd. vehicles are sign written and have tracking devices and dashcams attached, each vehicle is attached to a specific driver with any changes logged weekly to ensure we know at all times who is driving the vehicle and is planned destination. The vehicles are locked whenever unattended.

Possible Indirect Threats:

Below is a non-exhaustive list that details possible direct threats to organisations and Traction Rail Electrical Ltd's response to how it deals with these direct threats:

- **Operating in High Risk areas which are likely to be targeted:** Traction Rail Electrical Ltd. is committed to ensuring that the individuals that are put to work are able to work as safely as possible, this includes ensuring that regular checks are made with regards to threat levels etc. and that individuals who work for/alongside Traction Rail Electrical Ltd. are aware of how they recognise terrorist threats.
- **IT networks reacting to the sudden emergence of a new virus or hackers:** Traction Rail Electrical Ltd. files are cloud based with back up copies of crucial company information backed up to a device to ensure operation is still viable. All laptops have anti-virus guards in place.
- **Theft of Company Information:** Traction Rail Electrical Ltd. complies with new GDPR legislation and ensures that all staff/subcontractors/potential staff are aware of how Traction Rail Electrical Ltd. will keep their personal data protected and how they in turn are required to keep sensitive data protected. Restrictions are in place to ensure that only key personnel have access to higher level company information, in the unlikely event that sensitive data is stolen by personnel, legal documents are in place to hold them accountable. Traction Rail Electrical Ltd. encourages a clear desk policy at the end of each day and requires that any paper copies of sensitive information are shredded. All documents that are held electronically are password protected and any paper copies are held in lockable cabinets with access limited to key personnel. Any personal information (such as, but not limited to), addresses, dates of birth, NI numbers etc. are used only for the purpose intended are not provided to any unauthorised third parties.
- **Disruption to the company:** Traction Rail Electrical Ltd. annually review their Business Continuity Plan to ensure minimal disruption to the company.

Further Identifying Vulnerabilities:

- **People:**
- **Staff and contractors** – Ensuring that direct staff and subcontractors are checked before being employed/working for Traction Rail Electrical Ltd.. Ensuring that all staff and subcontractors have received and comply with the company's current GDPR.
- **Visitors** – That visitors to the Traction Rail Electrical Ltd. offices are by appointment and that a register is kept logging who is signing in and out. Doors and shutters etc. are kept locked to avoid members of the public walking in.

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- Customers and suppliers – Ensuring that risks are identified and mitigated in the Business Continuity plan, ensuring that we have more than one supplier on our approved suppliers list to avoid disruption in delivery of goods etc. Keeping robust financial records and applying for regular payments from our customers to ensure that amounts owed do not become too large in case of a company going into administration, suffering from a terrorist attack etc.
- **Physical Assets:**
- Buildings – Ensuring that Traction Rail Electrical Ltd. main premises are fully insured and are alarmed with operational CCTV, that logs are kept on all keys and alarm fobs issued to personnel and that if individuals leave employment/are no longer subcontractors that keys and fobs are returned.
- Vehicles – That all vehicles are fully insured, that the fleet utilise vehicle tracking technology and dashcams. That all drivers are matched to a specific vehicle, with the fleet manager and his deputies being made aware of any changes. That the drivers are aware of what to do in an emergency and that they ensure that the vehicles are locked when unattended.
- Equipment – That all equipment held in the storage area of the main Traction Rail Electrical Ltd. offices are recorded via a coding system and are added to the equipment register. That all equipment owned by Traction Rail Electrical Ltd. has had security labels added to them, that any equipment taken from stores for site works has been recorded and attached to specific job number and/or vehicle.
- **Information and processes:**
- IT systems - Traction Rail Electrical Ltd. files are cloud based with back-up copies of crucial company information backed up to a device to ensure operation is still viable. All laptops have anti-virus guards in place.
- Data and supply chains – please refer to above staff and contractors and Customers and suppliers.

Implementing Security Measures and Procedures:

Technology:

- Traction Rail Electrical Ltd. uses a combination of technical solutions to deter the theft of company vehicles, this includes remote door locks, ensuring that vehicles are secure and that all items such as tooling etc. are secured and (where possible) removed from the vehicles. Our fleet trackers are used to receive live updates of the location of the vehicles at any time, this telematics can be accessed from the main Traction Rail Electrical Ltd. office as well as remotely.

Training:

- Traction Rail Electrical Ltd. is committed to the professional development of both its staff and key sub-contractors, this is realised through the ongoing training of both NWR required courses and non-Sentinel based courses. Traction Rail Electrical Ltd. is committed to providing ongoing Driver Awareness through Tool Box Talks, e-learning and Driver focussed weeks; as part of this Traction Rail Electrical Ltd. communicates and reminds personnel about the ongoing issue of terrorism and the steps we can take as both individuals and as a company to counter this; we require all of our drivers to undertake the Counter Terrorism e-learning to ensure they maintain a level of awareness and vigilance, as well as knowing what to do in the event of a terror related event. The e-learning modules are to repeat every 24 months as a minimum to ensure staff and sub-contractors revisit these key topics and themes. Regular updates are attached to the Traction Rail Electrical Ltd. counter terrorism policy in the form of appendix 1, these are also circulated to staff to ensure they are aware of any changes.

Recruitment:

- Traction Rail Electrical Ltd. prides itself on demanding the very best of all of its staff and sub-contractors, we choose to work with personnel who will reflect our company values and strive to work to the high standard that Traction Rail Electrical Ltd. continually sets out. As part of our recruitment process we require a meeting with the potential candidate where they will be interviewed and where appropriate required to perform a skills test, we also request the candidate's C.V which details both their working history and relevant qualifications, we also request two references so that we have the facility to confirm these details.
- Any potential candidate must provide at least one form of photographic ID which is scanned and held securely on file, candidates are also required to attend a NWR pre-sponsorship medical and Drugs and Alcohol test, again these results are reviewed and held on file. Yearly 'Back to Work' briefings are also held, whereby staff and sub-contractors are required to complete and sign a self-medical questionnaire. In the event of medications being prescribed we have the facility to check the dosage etc. with an external medication advice centre which will provide a report as to whether the individual in question is okay to drive, work etc.
- Traction Rail Electrical Ltd. perform monthly DVLA checks on all of its drivers to ensure they remain eligible to drive under our fleet insurance. Drivers are aware that any points received on their licence etc. need to be reported to Traction Rail Electrical Ltd. immediately.
- Traction Rail Electrical Ltd. is an inclusive company, as such we do not discriminate on people's sex, racial background, sexual or religious orientation etc. All personnel are required to provide proof of identity and eligibility to work in the UK, guidance for this is followed via the Home Office website, these standards are regularly reviewed, and any updates adhered to.

Documentation – Risk assessments, method statements, emergency and business continuity plans

- Traction Rail Electrical Ltd. is fully committed to ensuring the safety of its personnel, as such we ensure we have risk assessments in place to identify the elements within our work that have the potential to cause harm and how we can reasonably reduce or mitigate these risks. Traction Rail Electrical Ltd. ensures that Work Package Plans and Method Statements are a key part of works enabling us to detail how we can do the job safely. On an annual basis we also update our business continuity plan to ensure we have identified the possible disruptions to the company and enable us to return to 'business as usual' as soon as possible.

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Counter Terrorism Champion

The roles and responsibilities of the Counter Terrorism Champion include but are not limited to the following:

- The creation and implementation of TrACTION Rail Electrical Ltd's emergency response plan.
- Ensuring that the Counter Terrorism Policy is reviewed, signed by the director and communicated with staff.
- Liaising with staff to ensure that all personnel understand the policy and what they are required to do.
- Ensuring that the Business Continuity Plan is followed to ensure a swift return to 'business as usual'
- Where appropriate, ensuring that any relevant information or evidence is collected and reported to the emergency services and senior management promptly.

Reporting:

Internal Reporting

- In the event that staff/sub-contractors encounter an incident and/or suspicious activity they are required to report it to the manager on duty as well as to the Counter Terrorism Champion, common methods of communicating include:
 - Phone
 - Text
 - Email
 - WhatsApp
- Personnel understand that in an emergency, it is best to contact a manager and Counter Terrorism Champion via the phone as it is the quickest method of communication
- Where necessary and/or appropriate this will be reported to the relevant external departments such as calling 101 (for crimes which do not require an emergency response), or further assessed with external reporting procedure followed

External Reporting

- When assessing whether incidents are substantial enough to inform the relevant external departments, the following questions should be asked:
 - Who and/or what was witnessed?
 - When was it seen?
 - Where did it occur?
 - Why is it suspicious?

If the threat is considered to be substantial or that there is considered to be an immediate threat to life, the following agencies can be contacted:

- Call 999 – speak to the police and report your suspicions
- Call the police anti-terrorist hotline on 0800 789 321 for immediate threat to life or property

Signed		Dated	02/03/2020
Managing Director			