



Reference number	V2 Apr 2018
Version	V 2.0
EIA Approval	Approved on 17 Apr 18
Approving Committee	Clinical Executive Committee 25 Apr 2018 Governing Body 22 May 2018
Review Date	Apr 2019

**With you.
For you.**



West Lancashire CCG is committed to ensuring that, as far as it is reasonably practicable, the way we provide services to the public and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on the basis of their age, disability, gender, race, religion/belief or sexual orientation.

Should a member of staff or any other person require access to this policy in another language or format (such as Braille or large print) they can do so by contacting the West Lancashire CCG who will do its utmost to support and develop equitable access to all policies.

Senior managers within the CCG have a responsibility for ensuring that a system is in place for their area of responsibility that keeps staff up to date with new policy changes.

It is the responsibility of all staff employed directly or indirectly by the CCG to make themselves aware of the policies and procedures of that CCG.

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1. INTRODUCTION

West Lancashire Clinical Commissioning Group (CCG) is committed to providing a safe working environment for its patients, staff, professionals and property. West Lancashire CCG will work with NHS Protect, the police, the Crown Prosecution Service, West Lancashire Borough Council, the National Security Services and other partners to create and safe and secure environment so that the highest standards of clinical care can be made available to patients.

Bombs have been a popular terrorist weapon from the 19th century, but even during periods of heightened terrorism, the chances of any given individual being affected by a bomb attack are low. However, some locations, organisations and individuals remain more likely than others to be the target of terrorist attack. Terrorists do not always target specific organisations when they plant bombs. They may well plant them at random, so the organisation may be affected simply because of where it is situated.

Threats more recently have come from terrorists who act in an extreme way following a cult or religion. Their focus is mainly on public areas and mass casualties so that their act has a greater impact. These acts are based on extremist views and following an extreme ideology or religion. The Government's strategy CONTEST is the UK's counter terrorism strategy that aims to reduce the risk we face from terrorism. It is made up of four work streams;

Protect – strengthening our borders, infrastructure, buildings and public spaces from an attack.

Prepare – where an attack cannot be stopped, to reduce its impact by ensuring we can respond effectively.

Pursue – to disrupt or stop terrorist attacks.

Prevent – to stop people becoming terrorists or supporting terrorism.

West Lancashire CCG will support the CONTEST strategy by providing Prevent workshops for all staff and monitor providers contractual obligation to deliver the Prevent strategy. West Lancashire CCG will support this strategy by running Prevent workshops for all its staff.

1.1 Aim

The purpose of this policy is to advise and support staff of the on bomb threats and to seek their support and commitment to create a pro-security culture.

This document contains information on the structure required and defines the roles and responsibilities to implement the bomb threat policy.

This policy aims to integrate security awareness into the general working environment of West Lancashire CCG and to reduce the risk of a bomb threat/attack.

- To support the personal safety, at all times, of patients, staff and visitors.
- To protect West Lancashire CCG office building from malicious acts, criminal damage and trespass.
- To protect West Lancashire CCG assets and information from theft, damage or fraud.

- To protect personal property belongings of staff and visitors whilst on West Lancashire CCG premises.
- To support the uninterrupted delivery of health and community care.

1.2 Scope

This policy applies to all staff employed by the CCG, either directly or indirectly, and to any other person or organisation that uses CCG's premises for any purpose. All staff have a responsibility to ensure that security measures and procedures are observed at all times. Managers should take a lead role in promoting and developing a security conscious environment.

2. DEFINITIONS

NHS Protect - Is an independent division of the NHS Business Services Authority (NHSBSA) and has responsibility for all policy and operational matters relating to the management of security in the National Health Service.

ACPO - Association of Chief Police Officers

Counter Terrorism Security Advisor (CTSA) - Contactable through the Lancashire Constabulary. This officer can advise on physical security.

CBRN Material - Chemical, biological, radiological or nuclear materials

3.0 Principles

The bomb threat policy establishes the following principles:

The delivery of a bomb threat response locally to national standards.

The creation of a pro-security culture - the promotion of a culture where security is the responsibility of every member of staff and anyone granted permission to use CCG premises. Where the actions of the minority who breach security are not tolerated.

To deter offenders from committing offences - deterring those who may be minded to breach security – using publicity to raise awareness of what the consequences of their intended actions could be, both personally and to the NHS.

To prevent offenders from committing offences - preventing security incidents or breaches from occurring whenever possible or minimising the risk of them occurring by learning from operational experience about previous incidents, using technology wisely and sharing best practice.

Detecting security incidents or breaches - and ensuring these are reported in a simple, consistent manner within the CCG, so that trends and risks can be analysed, allowing this data to properly inform the development of preventative measures or the revision of policies and procedures.

Investigating security incidents or breaches - in a fair, objective and professional manner, to ensure those responsible for such incidents are held to account for their actions, and that the causes of such incidents or breaches are fully examined and fed into prevention work to minimise the risk of them occurring again.

To put in place sanctions against those who breach this security policy - involving a combination of procedural, disciplinary, civil and criminal action as appropriate.

To apply for redress against offenders - through the criminal and civil justice systems against those whose actions lead to loss of NHS resources, through security breaches or incidents. Also ensuring that those who are the victims within the NHS environment are supported to seek appropriate compensation from offenders for loss of earnings or for the effects of injuries sustained.

3.1 The Law

The vast majority of bomb threats are hoaxes. Making such malicious calls is an offence contrary to *Section 51 of the Criminal Law Act 1977* and should always be reported to the police.

3.1.1 **Section 51(1)** It is an offence for any person to place any article in any place or to despatch an article by post, rail or other means with the intention of inducing in another person a belief that it is likely to explode or ignite and, therefore, causing personal injury or damage to property.

3.1.2 **Section 51(2)** It is an offence for any person to communicate any information, which he knows to be false, to another person with the intention of inducing in him or another person a false belief that a bomb or other thing likely to explode or ignite is present in any place or location.

3.1.3 **Section 51(3)** For a person to be guilty of any of the foregoing offences, it is not necessary for him to have any particular person in mind as the person in whom he intends to induce the belief that is mentioned in either of the offences.

3.2 Legal Duty

While the risk of an individual being caught up in a bomb-related incident is low, each health body has a responsibility under the *Health and Safety at Work Regulations 1992* to minimise that risk. These regulations provide that:

- all employers owe their staff and visitors a duty of care; the responsibility for safety on their premises rests with employers, not the police

appropriate procedures must be in place to deal with serious, imminent

danger

- there should be people competent to implement the procedures
- employees must be informed of the hazards, and the steps to be taken in the event of an emergency
- in the case of serious, imminent danger, work must be stopped immediately and people moved to a place of safety
- access must be restricted, and resumption of normal work prevented, while the serious and imminent danger persists
- in the event of an emergency, plans are disclosable and may be subject to scrutiny in any enquiries or court proceedings.

4. DUTIES AND RESPONSIBILITIES

4.1 Security Management Lead (SML)

The CCG executive responsible for security management is the Chief Finance Officer. The Chief Finance Officer as security management lead (SML) will lead and communicate at senior level on strategies to deal with bomb threats of any kind. This will assist the CCG in meeting its responsibilities for safeguarding the health and safety of staff.

The SML should work with CCG staff to promote and champion strategies to terrorism at governing body level.

Final responsibility for security management matters, including strategies to deal with bomb threats, remains with the SML regardless of whether or not the Local Security Management Specialist (LSMS) and/or security staff are directly employed by the CSU or provided by an external contractor.

4.2 Local Security Management Specialist (LSMS)

The CCG has commissioned Midlands and Lancashire Commissioning Support Unit (CSU) to provide security services including the role of local security management specialist.

- The LSMS will:
- Ensure that appropriate and adequate risk assessments of security arrangements are in place based on site visits, historical information and intelligence received and where necessary, changes made in agreement with the organisation to reduce or eliminate the risk of bomb threats towards staff or the organisation.

Provide clear advice and guidance to all staff on how to deal with situations where a bomb threat has been made or is suspected.

- Ensure support is provided, as and when required, to West Lancashire CCG, where an incident has taken place.
- Assist in the action following any adverse incidents involving a bomb threat or real life situation, including liaison with the police as appropriate;
- Ensure that any significant areas of concern are reported to the Chief Finance Officer who is the CCG's nominated Security Management Director.
- Liaise with necessary authorities e.g. police, NHS Protect to impose sanctions on those who commit an offence under Section 51 (1) (2) (3) of the Criminal Law Act 1977, where appropriate.

4.3 All Managers

All managers must ensure they understand how this policy is enacted, when it should be enacted and their role within this structure.

4.4 All Staff

Staff are responsible for keeping themselves informed and up to date about changes to the procedural documents, particularly policy changes. Updates will be provided by the staff newsletter.

5.0 PROCEDURAL GUIDELINES

Most bomb threats are made over the phone but could also come from other media devices. The overwhelming majority are hoaxes, often the work of malicious pranksters, although terrorists also make hoax calls. Any such hoax is a crime and, no matter how ridiculous or unconvincing, should be reported to the police and reported on an incident report.

- The police **MUST** be contacted immediately whenever a bomb threat is received by calling 999 or 112.
- West Lancashire CCG Security Management Lead (SML) (the Chief Finance Officer) or deputy **MUST** be informed of any bomb threat. The SML or deputy will manage the implementation and compliance with this policy and should consider search of premises
- All evidence and/or crime scenes must be left undisturbed until the police forensics have carried out their duties and the Police have said it is ok to do so.

- The CSU's Local Security Management Specialist (LSMS) should be contacted as soon as possible (by phone or email) to inform him/her of the incident regardless of whether it was a hoax or not.

- An incident report **MUST** be completed as soon as reasonably possible. A copy should be sent to West Lancashire CCG LSMS and SML.
- West Lancashire CCG Business Continuity Plan should be implemented, if required.

5.1 Suspicious and/or Unattended Bag/Parcel

A bag or parcel is required to be easily portable, such bombs are unlikely to weigh more than 25kg, although even an ordinary sized briefcase can contain about 12kg of explosive. This type of explosive could cause serious damage to buildings and fatal to people nearby or in the blast radius.

A suspicious and/or unattended bag/parcel is one that is out of place from the norm. In a small office environment is easier to spot as staff should be familiar with their surroundings.

- Do not touch or attempt to move the bag/parcel under any circumstances until it is safe to do so.
- Speak to the senior manager on duty about your suspicions of the bag/parcel
- Try to quickly identify if it belongs to a member of staff, quietly and calmly. Especially reception staff as they may have seen its owner brings in the bag and if they have left.
- Review CCTV to see if you can establish the carrier of the bag/parcel.
- Consider a controlled evacuation of the immediate area and contact the police immediately.
- Follow police advice.
- If the device is making strange noises or smoking, evacuate immediately without delay.

5.2 Telephone Bomb Threats

Bomb threats made by phone are usually to hide the identity of the caller and to allow people to evacuate the area of the possible bomb threat. The callers will usually spend some time on the phone describing the location of the bomb. The expected impact of the caller is to cause disruption rather than loss of life. Quick callers are usually hoaxers but should not be ignored as such. Staff should consider the following when taking a call like this and follow these guidelines.

Staff receiving a bomb threat telephone call should follow these instructions:

- Remain calm and listen

Obtain as much information as possible – try to get the caller to be precise about the location and timing of the alleged bomb and try to establish whom they represent. If possible keep the caller talking

- If voice recording equipment is available switch it on
- When the caller rings off, dial 1471 (if that facility operates and you have no automatic number display) to see if you can get their number
- Follow **5.0 Procedural Guidelines**
- If you have not been able to record the call, make notes for the security management lead (SML) and police. Do not leave your post unless ordered to evacuate or until the police or the SML or deputy advises. Refer to the appendix one for the full and comprehensive bomb threat action checklist.
- All staff must comply with the following the instructions:
 - Do not touch suspicious items
 - Move away to a safe distance
 - Prevent others from approaching
 - Communicate safely to staff, patients and visitors
 - Do not use hand-held radios or mobiles phones in immediate vicinity of a suspect item or at a distance of less than 15 metres.
 - Notify the police (in an emergency dial 999 or 112, non-emergency dial 101)
 - Ensure that whoever found the item or witnessed the incident remains on hand to brief the police.

5.3 Letter Bombs

- Letter bombs, which include parcels, packages and anything delivered by post or courier, have previously been a commonly used terrorist act.
- Letter bombs may be explosive or incendiary (the two most likely types) or conceivably chemical, biological or radiological. Anyone receiving a suspicious delivery is unlikely to know which type it is, so procedures should cater for every eventuality.
- A letter bomb will probably have received fairly rough handling in the post and so is unlikely to detonate through being moved, but any attempt at opening it may set it off. Unless delivered by a courier, it is unlikely to contain a timing device.
- Letter bombs come in a variety of shapes and sizes: a well-made one will look innocuous but there may be tell-tale signs.
- Good housekeeping is essential for safe guarding staff. Ensuring that parcels, boxes and other similar objects are stowed away safely and as soon as possible is a good crime / bomb threat prevention practice.

Indicators of a letter bomb

- It is unexpected or of unusual origin or from an unfamiliar sender.

- There is no return address or the address cannot be verified.
- It is poorly or inaccurately addressed, e.g. incorrect title, spelt wrongly, title but no name or addressed to an individual no longer with the CCG.
- The address has been printed unevenly or in an unusual way.
The writing is in an unfamiliar foreign style.
- There are unusual postmarks or postage paid marks.
- A jiffy bag or similar padded envelope has been used.
- It seems unusually heavy for its size. Most letters weigh up to about 30 grams, whereas most effective letter bombs weigh 50-100 grams and are 5mm or more thick.
- It has more than the appropriate value of stamps for its size and weight.
- It is marked 'personal' or 'confidential'.
- It is oddly shaped or lopsided.
- The envelope flap is stuck down completely (a normal letter usually has an un-gummed gap of 35mm at the corners).
- There is a pin-sized hole in the envelope or package wrapping.
- There is an unusual smell, including but not restricted to, almonds, ammonia or marzipan.
- Has a greasy or oily stain on the envelope.
- There is an additional inner envelope and it is tightly taped or tied (however, in some organisations sensitive material is sent in double envelopes as standard procedure).

Staff need to be aware of the usual pattern of deliveries and to be briefed of unusual deliveries. The best practice is to open letters with letter openers (and with minimum movement) to keep hands away from noses and mouths and always wash your hands afterwards. Staff should not blow into envelopes or shake them. Packages suspected of containing chemical, biological, radiological (CBR) material should ideally be placed in a double-sealed bag.

5.4 Vehicle Bombs / Vehicle Borne Improvised Explosive Devices (VBIEDs)

Vehicle bombs are one of the most effective weapons in the terrorist's arsenal. They are capable of delivering a large quantity of explosives to a target and can cause a great deal of damage.

If a vehicle is suspected or identified, staff should remain in their offices until the police arrive. If that is not deemed to be safe senior management should consider exiting safely from the building to a safer area. The use of an alternative exit should be considered if usual exit is close to suspect vehicle and leave in an orderly fashion.

5.5 Person-Borne Bombs

Person-borne bombs are usually, as their name implies, explosive devices carried by an individual. These are usually carried in containers such as rucksacks or briefcases, which are chosen to blend in easily with the target surroundings.

Suicide bombers have previously used this method in order to hide their explosive device. Poorly made devices can detonate prior to set off at the intended time. Some may start smoking which is an indication something is not right and should be treated as a real life incident flowing the evacuation process.

5.6 Chemical, biological and radioactive (CBR) Incidents

Responses to CBR incidents will vary more than those involving conventional or incendiary devices, but the following general points should be noted:

- The exact nature of an incident may not be immediately apparent. For example, an Improvised Explosive Devices (IED) might also involve the release of CBR material.
- In the event of a suspect CBR incident within the building, switch off all air conditioning, ventilation and other systems or items that circulate air (e.g. fans and personal computers).
- Do not allow anyone, whether exposed or not, to leave evacuation areas before the emergency services have given medical advice, assessments or treatment.
- If an incident occurs outside the building, close all doors and windows and switch off any systems that draw air into the building.
- Remember to let the police know what action you are taking during any incident.
- Building managers should ensure that they have a working knowledge of the heating, ventilation and air condition (HVAC) systems and how these may contribute to the spread of CBR materials within the building.

5.7 Search plans

- Appoint a search co-ordinator (usually the most senior manager on site) to produce and maintain a search plan. He or she should initiate any searches and liaise with other searches.
- All staff should search their immediate area without disturbing anything to see if there is anything unusual. Staff will be familiar with their areas and so best to identify a parcel or bag or box is out of place or not seen before.
- Staff should be careful not to evacuate the area until advised to do so. This could be a ploy by the caller to move people into an area e.g. the car park, where the real device is situated.
- Prioritise the important areas that need to be searched; particularly those areas open to the public, other vulnerable areas such as cloakrooms, stairs, corridors and lifts, as well as evacuation points and routes, car parks and other outside areas such as goods or loading bays.
- The search should be started calmly to prevent hysteria. The search can be initiated by talking to staff in groups or individually.
- Any object found that is identified as suspect; staff should move away and inform the search co-ordinator and leave for police to investigate further.

5.8 Evacuation Plans

The purpose of evacuation is to move people from an area where they might be at risk to a place of lesser risk. The premises may need to evacuate because of:

- A threat aimed directly at the building.
- A threat received elsewhere and passed on to the CCG by the police.
- Discovery of a suspicious item in the building (perhaps a postal package, an unclaimed hold-all or rucksack).
- Discovery of a suspicious item or vehicle outside the building.
- An incident to which the police have alerted West Lancashire CCG.

A risk assessment should be done in conjunction with the Landlord to identify safe routes of egress and co-ordinating this information to other stakeholders on site. This should be done in advance of an incident occurring. The CSU's Local Security Management Specialist will provide assistance in developing such plans. The plans should include:

- Full evacuation outside the building
- Evacuation of part of the building, if the device is small and thought to be confined to one location (e.g. a letter bomb found in the post room).
- Full or partial evacuation to an internal safe area, such as a protected space, if available.
- Evacuation of all staff apart from designated searchers.
- Maybe achieved by **external** evacuation or **internal** sheltering.
- Assembly areas should be at least **500 metres away** from the incident
- Any evacuation point should be searched and should not be near to secondary hazards i.e. glass (windows etc.) or petrol supplies / sources (vehicles).

5.9 Re-occupancy

Re-occupancy must always be discussed with the police and as necessary the other emergency services. Safety remains paramount, and allowance must be made for secondary devices (bomb) vagueness of descriptions of location of suspected devices. If an explosion occurs the building structure may be unsound and damage to power and gas may make the environment unsafe. Where a crime has been committed, the building itself will be a crime scene.

6. IMPLEMENTATION, COMPLIANCE, TRAINING

Information about this policy will be cascaded to all staff via the staff newsletter. The policy will be placed on the CCG's website. Bomb threat awareness training/information will also be provided.

7. MONITORING, REVIEW & Equality Impact Assessment

7.1 Monitoring

The Head of Corporate Affairs will monitor the effectiveness of this policy through incident reporting and evacuation drills. The Clinical Executive Committee will receive reports on any incidents.

7.2 Review

Changes made to this policy will be based on legislation, lessons learned and new information from Department of Health, NHS Protect and/or Governments Home Office.

All changes to this policy must be ratified by West Lancashire CCG's Clinical Executive Committee.

7.3 Equality Analysis Assessment

An equality and diversity impact assessment has been carried out on this policy and is embedded in this document.



EIRA Bomb Threat
Policy_V1.xlsm

APPENDIX ONE

AIDE MEMOIRE FOR A BOMB THREAT

Immediately alert someone else if possible so that they can inform the police.

DO NOT PUT DOWN THE HANDSET OR CUT OFF THE CALLER. Obtain as much information as you can.

Complete this form as you go along, asking questions in sequence as necessary.

THREAT MESSAGE (Exact words)

.....
.....
.....
.....

WHERE IS IT?	
WHAT TIME WILL IT GO OFF?	
WHAT DOES IT LOOK LIKE?	
WHAT KIND OF BOMB IS IT? (Type of explosive)	
WHAT WILL CAUSE IT TO GO OFF?	
DID YOU PLACE THE BOMB?	
WHY ARE YOU DOING THIS?	
WHO DO YOU REPRESENT?	
WHAT IS YOUR NAME?	
WHAT IS YOUR ADDRESS?	
TELEPHONE No?	

If the threat relates to another site or location, contact the police at once by dialling 999.

(Continued)

COMPLETE THE FOLLOWING AS SOON AS PRACTICABLE

Extension number at which call received			
Date of call			
Time of call			
Length of call			
DETAILS OF CALLER			
Man	Woman	Child	Old/young
Approx age:			
THREAT LANGUAGE			
Well-spoken (educated)	Foul	Irrational	
Taped	Incoherent	Message obviously being read	

CALLER'S VOICE			
Calm	Angry	Excited	Slow
Soft	Rapid	Loud	Laughter
Crying	Normal	Distinct	Slurred
Nasal	Stutter	Lisp	Raspy
Deep	Ragged	Clearing throat	Deep breathing
Cracking voice	Disguised	Accent	Familiar
If voice is familiar, who did it sound like?			

BACKGROUND SOUNDS			
Interruptions	Someone in background?	Street noises	Crockery
Voices	PA system	Music	House noises

Motors	Office machinery	Booth	Factory machinery
Animal noises	Clear	Static	Local
Long distance	Aircraft	Children	Others
REMARKS			

DETAILS OF PERSON RECEIVING CALL	
Name:	Unit/ward/dept:
Extension no:	Has the call been taped at your end?
SIGNATURE:	