

RiskTopics

Civil disturbance: Mitigation strategies

A civil disturbance event is not a new risk, and it may occur anywhere. There can be indications a threat is developing, and these signs offer an opportunity to evaluate vulnerabilities and consider loss reducing actions.

Introduction

Protests, demonstrations, rallies, marches, strikes, and similar gatherings are a means for people to express a shared point of view publicly. High visibility events, meetings, and conferences for global organizations may attract anti-globalization demonstrators, global trade protesters, and anarchists. Religious and ethnic conflicts can lead to serious unrest. Also, local events involving police action or other governmental decisions can spawn civil unrest both locally and nationally.

Although many mass gatherings remain orderly and peaceful, activists may use the occurrence of international, national, and local events to promote unrest, arson, vandalism, riots, or other forms of large-scale civil disturbance. What begins as a local event may expand to a broader geographic region.

This document offers guidance to businesses to enhance emergency preparedness at locations potentially exposed to civil disturbance.

Discussion

There are many reasons for groups of people to mass together to express shared concerns.

Consider:

- Demonstrations outside of political meetings
- Protest gatherings in response to actions by persons in positions of authority
- Demonstrations in response to racial, ethnic or religious injustice
- Worker strikes outside businesses

- Fans reacting to the outcome of a sporting event

Often such gatherings are managed by public authorities to minimize or avoid a civil commotion. However, experience shows that controlled gatherings can suddenly develop into unrest, vandalism, riot, or other forms of civil disturbance.

What is a civil disturbance?

A civil disturbance is an event resulting from collective unlawful actions by a group of individuals involving significant disruption of the public order. The disturbances may be in the form of peaceful disobedience, protests, marches, or demonstrations by activist groups. However, businesses should consider the possibility that a civil disturbance may turn into violence, endangering people, and property.

Possible causes

A civil disturbance may occur due to any number of triggers, such as changing economic conditions, the political or social environment, increasing unemployment levels, or actions by local governmental agencies.

How they may develop

While many mass gatherings may be planned events, with some advance information about the intent, location, and timing, others may occur spontaneously. In either scenario, the event could rapidly escalate, threatening people and property. The unrest and civil disturbances may have a severe impact on business operations and result in a significant overtaxing of law enforcement and public safety resources.

Why they may develop and spread rapidly

The convergence of the internet and social media have provided a means to communicate and mobilize large crowds rapidly. What may begin as a small and manageable gathering may quickly grow beyond the control of local authorities.

Guidance

Civil disturbance and rioting are a known risk. Businesses should evaluate the exposures and vulnerabilities of each of their locations.

Conduct a risk assessment for each location that may be exposed to civil disturbance. The risk assessment should evaluate the adequacy of existing emergency plans and identify needed enhancements. Organizations should assess the specific risks and exposures of each of their locations and consider the appropriate protection, security, and mitigation actions to take. As the exposure to civil commotion can be dynamic, this assessment should be periodically reviewed and updated.

Exposures that drive the civil disturbance threat at a given location vary. The following are a few examples of conditions that may introduce an increased level of exposure to civil disturbance.

- Proximity to sporting or entertainment complexes
- Proximity to venues/parade routes that may trigger a protest gathering
- Proximity to a business that may be a target of a protest gathering
- Proximity to government buildings and foreign embassies and consulates

- Glass front premises displaying valuable or desirable items

While any business in a vulnerable zone may be in danger, hotels, restaurants, arenas, convention halls, retail stores, and real estate properties may face additional challenges related to the safety of their employees and customers.

Where a location plans to host an event that may be targeted for protest, the importance of full collaboration with law enforcement is vital in the event planning phase.

Two-level action plan

To improve protection for employees and facilities, companies should consider preparations on two levels. Enhancement of current emergency plans may be needed.

The two-level approach includes:

- First action level - Steps to take when there is a warning of events that could lead to civil disturbance.
- Second action level - Steps to implement when a civil disturbance develops.

First action level - Awareness of potential civil disturbance

Advance awareness of an event that may lead to civil disturbance allows nearby locations time to plan and implement reasonable protection measures. Develop an action plan to prepare the facility for anticipated public disorder, including the shutdown or curtailing of operations as necessary.

- Establish policies and safety protocols to address civil disturbances and prioritize the protection the protection of both employees and customers from injury.
- Emergency action plan
 - Implement general emergency action plan measures such as:
 - Backing up essential business records.
 - Removing or securing high-value materials and cash.
 - Checking mail and packages for suspicious content or nature.
 - Expand the emergency action plan to include a response to threats of civil disturbance:
 - Assign one or more persons the authority to implement and coordinate the emergency action plan for potential civil disturbance threats.
 - Designate and coordinate all media and public communication through a trained spokesperson.
 - Identify surrounding locations or conditions that could become a trigger to civil disturbance threats to the site.
 - Assign one or more persons the responsibility of monitoring news releases and bulletins from the civil authorities, monitoring social media for any groups that may be known to organize protests.
- Security measures - Verify all established security measures are working. Enhance the security level to the extent that operations will allow. Consider the following passive, active, and manual measures:
 - Passive:
 - Fences – Keep gates closed. Lock gates that are not attended.

- Windows – Verify protective grills are in place for all accessible windows, including basement windows. Where shutters are provided, close, or be prepared to close them quickly. Remove high-value or attractive goods from display windows.
- Doors – Keep unattended exterior doors closed and locked, including basement access doors. Verify all locks are secure from tampering.
- Elevated doors, windows, and other access points (i.e., air intakes) – Secure or eliminate access to any upper story or rooftop doors or windows that are not inherently inaccessible to intruders.
- Signage – Verify “No Trespass” signage is in place.
- Active:
 - Electronic illegal entry system - Confirm systems are in service and activate all features to the extent that operations permit.
 - Video surveillance system - Confirm the system is in full service and recording conditions. Enhance video surveillance of key areas such as the lobby, entrances, and docks. If possible, record video files to an off-site server or cloud computing platform. Ensure cameras can provide sufficient acuity to identify persons.
 - Perimeter lighting - Confirm that all outside areas are well-lit during non-daylight hours.
- Manual:
 - Card access systems - Reinforce card access system policies, stressing the need to avoid entry of unauthorized persons.
 - Security staff - Prepare to enhance security staff levels based on the risk assessment findings. Contracting and coordinating with outside security services may be necessary. Do not wait until the start of the disturbance to secure contract security service. Provide training to ensure that the security staff does not escalate tensions with any protestors.
 - Security equipment (radios, cell phones, flashlights, first aid supplies) – Verify they are available and working.
- Fire protection measures – Verify fire protection systems are ready, and ignitable materials are secured.
 - Verify all fixed fire protection systems are in service, including the following:
 - Water supply valves are open.
 - Water tanks are full.
 - Fire hydrants are accessible.
 - Fire pumps are in automatic mode.
 - Fire pump fuel tanks are full.
 - Sprinkler control valves are open.
 - Fire extinguishing systems are in service.
 - Fire alarm systems do not display any “trouble” conditions.
 - Fire doors are functional and not obstructed.
 - Secure outdoor flammable and combustible materials, including:
 - Fuel pumps – De-energize pumps and lock dispensing handles.
 - Flammable and combustible liquid tanks – Close and lock discharge valves.
 - Flammable gas cylinders – Lock, secure or remove from site.
 - Yard storage – Move indoors.
 - Vehicles – Garage or relocate.

- Dumpster and trash containers – Empty or remove from the site if possible.
- Combustible debris – Implement housekeeping measures.
- Emergency power – Conduct the following checks and address as needed:
 - Emergency generator fuel tanks are full.
 - Emergency power systems have been tested and are operable.
 - Emergency lighting is functional.
- Evacuation
 - Schedule employees to work remotely, as possible, when the company becomes aware of protests or marches.
 - Plan the departure of employees and customers. Share the plan with local authorities.
 - Plan an alternate evacuation route or defend in place strategy for employees and customers should the disturbance prevent or block an orderly evacuation.
 - Plan to notify authorities when the evacuation plan is implemented and when completed.
- Communication actions
 - Verify the onsite communication is assigned to a designated individual with an alternate back up.
 - Verify employees know that only the designated individual is to speak to the media. Also, ask them to refrain from posting information on social media until after the situation stabilizes.

Second action level - Implementation during an actual civil disturbance

When awareness of an actual civil disturbance develops, take additional actions as determined by the risk assessment, such as:

- Security actions
 - Passive:
 - Fences – Close and lock all gates.
 - Window – Close windows where provided, close protective systems such as shutters. If available, lock the windows.
 - Doors – Close and lock all exterior doors.
 - Storefront protection – Verify roll down shutters or screens (site hardening) are in place if provided.
 - Active:
 - Electronic illegal entry system – Activate the perimeter monitoring system. If a full evacuation is planned, activate the interior monitoring points.
 - Video surveillance system – Activate recording of both interior and exterior cameras.
 - Fire protection actions – Close all internal fire doors as time permits.
- Evacuation – Initiate evacuations based on the threat assessment or local authority requests.
- Reporting: Maintain an incident log and complete reports as soon as it is safe to do so for appropriate reporting to the corporate management, legal, and the insurance company.

Additional considerations for personnel remaining onsite during a civil disturbance

Personnel and employee issues will vary depending on the type of operations, need for continuous or shift operations, and other factors.

- Plan and provide housing and food for employees if shelter-in-place becomes necessary. Confirm that employees who are at work have the means to stay, if necessary, during the disturbance.
- Be aware of any curfews in effect. A curfew will limit the availability of employees, especially during evening and night shifts. Employees may not have the opportunity to get to/from work. Schedule accordingly.
- Verify that employees remaining on property during the disturbance can contact their families. This capability may lessen the desire of staff to leave and go home.
- Anticipate travel needs and challenges during a civil disturbance in affected areas. Instruct employees to avoid using public transportation during the disruption.
- Utilize one specific employee entrance that is controlled by security. Only employees scheduled to work should be allowed access to the building.

Additional considerations for Construction

- Awareness of potential civil disturbance
 - For the site:
 - Provide and maintain lighting.
 - Provide and maintain fencing.
 - Provide and maintain security guard service.
 - Provide and maintain electronic monitoring systems such as fire, intrusion and water leak detection devices
 - For equipment and materials:
 - Utilize lockable steel Conex containers for storage of equipment and materials.
 - Maintain an equipment inventory list.
 - To avoid prolonged storage on the project site, schedule material deliveries, especially lumber, appliances and fixtures, as required to support actual construction progress.
- Implementation during an actual civil disturbance
 - Remove unsecured building construction materials and equipment from the site. Unsecured means visible and accessible to intruders.
 - Implement a communication plan to keep employees, and subcontractor workers advised of status

Additional considerations for hotels

- Awareness of potential civil disturbance
 - Hotels may lack a lockable exterior main entrance door. Where the facility could be exposed to civil disturbance, a means to secure the main entrance door should be considered. The protection should not compromise the function of emergency exits.

- Instruct reservation and front-desk employees to inform guests of potential disturbances in the area.
- Consider revising no-show billing practices for reservations canceled or not honored during the period of disturbance.
- Ensure adequate supplies (food and beverages) are on hand to last the anticipated duration of the disturbance.
- Awareness of actual civil disturbance
 - Be transparent in communications with guests regarding the potential disturbances in the area.
 - Provide ongoing updates to guests via the hotel event boards, television system, or letter.
 - Encourage guests to stay in the hotel property and to avoid going out to dinner, shows, etc.
 - Relocate employees, such as the doormen and valet parking attendants, from the exterior of the hotel during the disturbance.
 - Provide security escorts for guests to/from hotel parking garages only.
 - Relocate guests from any ground floor guestrooms or meetings spaces to upper floors of the hotel.

Additional considerations for retail stores

- Awareness of potential civil disturbance
 - Consider the installation of:
 - Roll down burglar gates (site hardening).
 - Vehicle bollards.
 - Impact-resistant film to protect display windows.
 - Determine the availability, capabilities, and use of law enforcement, mall security, third party security, and internal company security as response resources.
 - Review and update corporate arrest/apprehension guidelines to protect management and employees from injury.
- Implementation during an actual civil disturbance
 - Follow corporate office and corporate legal guidelines to notify police, mall security and management (district, regional and corporate) of civil disturbance. Instruct employees not to confront rioters or looters. Protect employees and customers from injury. Remind managers, employees, and customers, as necessary, about safety protocols.
- After the event:
 - Cooperate with police or local authorities.
 - Provide copies of videos and witness statements as directed by the corporate office and legal counsel.
 - Critique event response. Obtain local management and employee feedback.
 - Update policies and procedures based upon lessons learned.
 - Following a civil disturbance event, protect surveillance records. Also, safeguard any areas impacted by theft for analysis by legal authorities.

Enhance surveillance systems as well as building physical security, safety, and staffing as necessary.

Conclusion

Civil unrest and disturbances are potential risks for most businesses, and no company is immune. The risk for your business will depend on many factors. These factors may include; the nature of the disturbance, the proximity of the site to the event, and the type of business operated.

A better understanding of these threats and vulnerabilities will help develop a more comprehensive risk assessment. Completing a thorough risk assessment and implementing necessary changes to your risk management program in advance of any scheduled event is a prudent approach to help mitigate this threat.

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