While civil disturbances and rioting is not a new risk, it is a changing threat that must be evaluated specific to your own operations and vulnerabilities. Civil unrest and disturbances are potential risks for most businesses. The impact on your business depends on many factors, such as the event, proximity of location and type of business. A better understanding of these threats and vulnerabilities will help in a more comprehensive risk assessment. Completing a comprehensive risk assessment and implementing necessary changes to your risk management program is a prudent approach to mitigate this threat.

Introduction
Protests, demonstrations, rallies, marches, strikes and similar gatherings are means for a mass of people to publically express a shared point of view. High visibility events, meetings and conferences for certain global organizations, such as International Monetary Fund, World Bank, G-8 and NATO, frequently attract anti-globalization demonstrators, global trade protesters and anarchists. Religious and ethnic conflicts can also lead to serious unrest. Although in most parts such gatherings remain orderly and peaceful, convergence and influence of international, national and local activist and affinity groups can result in unrest, arson, vandalism, riots or large scale civil disturbance with potential for serious impact on businesses. 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. Consider:

- Demonstrations associated with the “Arab Spring”.
- Protest camps of the “Occupy” movement across many US cities.
- Protest gatherings outside political meetings.
• Worker strikes outside businesses.
• Fans attending sporting events.

Often such gatherings are managed by public authorities to minimize or avoid civil commotion. However, experience shows that controlled gatherings can suddenly develop into unrest, vandalism, riot, or other forms of civil disturbance. Civil disturbance is an event resulting from collective unlawful actions by a group of individuals involving significant disruption of the public order. This may be in the form of peaceful disobedience, protests, marches or demonstrations by activist groups but the greater concern is for a civil disturbance turning into violent rioting endangering properties and persons. While some demonstrations and marches can be planned events with some advance information about the intent, location and timing, they can be also be spontaneous or escalate rapidly threatening properties and people. Such events and their aftermath may last for a short time or for several days. The unrest and civil disturbances may have serious impact on business operations and result in a significant overtaxing of law enforcement and public safety resources.

Guidance

While civil disturbances and rioting is not a new risk, it is a changing threat that must be evaluated specific to your own operations and vulnerabilities. The current economic and political environment and high unemployment levels are significant drivers. In addition, the convergence of internet and the evolving ability of social media to rapidly communicate and mobilize large crowds are all impacting this risk adversely. A comprehensive risk assessment can lead to better understanding of this risk and greatly aid an organization in evaluating the adequacy of existing emergency plans and identify needed enhancements for protection and mitigation measures. Emphasize protection of life as a priority.

Conduct a risk assessment for each location that may possess an exposure to civil disturbance. Separate assessments are urged for each location as the threats and vulnerabilities are likely to be unique. The risk assessment is intended to evaluate the adequacy of existing emergency plans and identify needed enhancements. Since each threat and vulnerability situations are unique, Zurich urges all organizations to assess their specific risk situation and take appropriate protection, security and mitigation actions. As the exposure to civil commotion can be dynamic in nature, plan to periodically review and update the risk assessment.

Risk assessment

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

• Urban or downtown locations.
• Proximity to sporting 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 high value or highly desirable items.
Although, any businesses in a vulnerable zone may be in danger: hotels, restaurants, arenas, convention halls, retail stores and real estate properties. They may face additional threats to the safety of their employees and customers.

Where a location is the actual venue of an event targeted for protest, the importance of full collaboration with law enforcement cannot be overstated in the event planning phase.

A risk assessment will help you prepare a concise list of actionable strategies to supplement and enhance your communication, protection, mitigation and emergency response plans. The strategy should focus on “Preparedness-Response-Recovery” approach to help reduce adverse impact on business and to ensure business continuity and resiliency. Review your insurance policies and coverage with your insurance broker or agent.

**Hacktivism**

Although not specific to any civil disturbance event, some organizations may be vulnerable to hacking, denial of service attacks and other cyber risks before, during and after such events. “Hacktivism” and risk of other cyber risk assessment should also be part of this risk assessment.

During the risk assessment, consider two action plan levels as appropriate - first, actions to take when there is advance awareness of events that could lead to civil disturbance, and second, actions to take when a civil disturbance actually develops. Several action strategies are listed in this Risktopic for your consideration and adaptation. Since threats and vulnerabilities to each location may be different, the action items listed below may not be all-inclusive for all locations. They are developed based on information from a variety of sources that are believed to be reliable. Start planning well in advance and seek answers from authorities and capable experts. Do not procrastinate or delay plan implementation.

**Awareness of potential civil disturbance**

Advance awareness of an event that could lead to civil disturbance allows potentially affected locations time to implement reasonable measures to prepare. Develop an action plan to prepare the facility for anticipated civil disturbance, including possibly shutting down or curtailing operations as necessary.

- **Emergency action plan**
  - Implement general emergency action plan measures such as:
    - Backing up important business records.
    - Removing or secure high valued materials and cash.
    - Checking mail and packages for suspicious contents or nature.
  - Expand the emergency action plan to include a response to threats of civil disturbance:
    - Assign one or more person the authority to implement and coordinate the emergency action plan for potential civil disturbance threats.
    - Designate a trained individual as a media spokesperson to coordinate all communication.
    - Identify locations or conditions that could become a trigger to civil disturbance threats to the location.
    - Assign one or more persons the responsibility to monitoring the news releases and bulletins from the civil authorities, monitoring the Facebook, Twitter and other social media feeds for known groups such as “Occupy” and others that may be associated with organizing the protests. This monitoring may give you possible intelligence into group’s evolving action plans and
recruiting/mobilizing tactics for marches and protest demonstrations at specific locations. The on-site security teams should have timely access to any developing situational information and ability for prompt evaluation of trajectory of any escalating situation to determine the need for emergency action. Adjust travel plans and work schedules as necessary to maintain access to staff needed to manage and implement emergency actions.

- **Security actions** - Verify that all security measures are working and enhance the security level to the extent that operations will allow.
  - Passive:
    - Fences – Maintain 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 prepare to close them. Remove high valued or attractive goods from display windows.
    - Doors – Maintain unattended exterior doors closed and locked. This includes 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 door or window that are not inherently inaccessible to intruders.
    - Signage – Ensure “No Trespass” signage is in place.
  - Active:
    - Electronic illegal entry system – Confirm the systems are in serviceable condition, and activate all features to the extent that operations permit.
    - Closed Circuit TV systems – Confirm the system is in full service and recording conditions. Enhance video surveillance of key areas, such as the lobby, entrances and docks.
    - Perimeter lighting – Confirm that all outside areas are illuminated during non-daylight hours.
  - Manual:
    - Card access systems – Reinforce card access system use policies stressing the need to avoid entry of unauthorized persons.
    - Security staff – Prepare to enhance security staff levels based upon the risk assessment findings. Contracting and coordinating with outside security service may be necessary. Do not wait until the start of the disturbance to secure contract security service.
    - Security equipment (radios, cell phones, flashlights, first aid supplies) are available and working.
- **Fire protection actions** – Take actions to 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
    - Diesel fire pump fuel tanks are full
    - Sprinkler control valves are open
    - Fire extinguishing systems are in service
    - Fire alarm systems do not display “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 site
- Combustible debris – Implement housekeeping measures

Emergency power - Take actions to verify emergency system are ready.
- Emergency generator fuel tanks are full
- Emergency lighting is functional

Evacuation – Initiate evacuation actions based on the risk assessment.
- Plan the departure of employees and customers. Based upon the risk assessment, this may involve the evacuation of all persons or all persons except security staff.
- Plan an alternate evacuation route or defend in place strategy for employees and customers should the disturbance prevent or block an orderly evacuation.
- Notify authorities of the evacuation actions.
- Notify the alarm company of any complete evacuation of all persons.

Communication actions: Verify the on-site communication is assigned to a designated individual and an alternate back up.

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

- Security actions - Verify that all provided security measures are working and enhance the security level to the extent that operations will allow.
  - Passive:
    - Fences – Close and lock all gates.
    - Window – Close window protective systems such as shutters.
    - Doors – Close and lock all exterior doors.
  - Active:
    - Electronic illegal entry system – Activate the perimeter monitoring system. Also, activate interior monitoring points if a full evacuation is planned.
    - Fire protection actions – Close all internal fire doors as time permits.

Evacuation – Initiate additional evacuations in accordance with the situational risk assessment.

Reporting: Maintain an incident log and complete reports as soon as it is safe to do so for appropriate reporting to the corporate, legal and insurance company claims notification.
Additional considerations for personnel remaining onsite during a civil disturbance

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

- Plan and provide housing for employees if necessary. Ensure that employees who are at work have a means to stay during the disturbance if necessary.

- 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.

- Ensure that employees remaining on property during the disturbance are able to contact their families. This may alleviate the problem of employees wanting to leave and go home.

- Anticipate travel needs and challenges during civil disturbance in affected areas. Avoid the use of public transportation during the disturbance. Utilize one specific employee entrance that is strictly controlled by security. Only employees scheduled to work should be allowed access into the building.

Additional considerations for hotels

- Awareness of potential civil disturbance
  - Hotels may not actually have 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.
  - Instruct reservation department employees to inform guests calling the hotel of potential disturbances in the area.
  - Consider revising no-show billing practices for reservations canceled or not honored during the period of disturbance.
  - Ensure there are adequate supplies (food and beverages) on hand to last the anticipated duration of the disturbance.

- Awareness of actual civil disturbance
  - Be honest in communications with in-house 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 and relocate all guests to upper floors of hotel from out of potential harm’s way.

Additional considerations for retail stores

- Awareness of potential civil disturbance

- Establish policies and safety protocols to address civil disturbances.
  - Make it a priority to protect employees and customers from injury.
  - Consider installation of roll down burglar gates with new or remodeled locations. Impact resistant film for glass protection at a minimum.
• Determine law enforcement, mall security, third party and company internal response, capabilities and use.

• Determine changes to corporate arrest/apprehension guidelines to protect management and employees from injury.

**Awareness of actual civil disturbance**

• Ensure police, mall security, district, regional and corporate notifications have been made as determined by corporate office and/or corporate legal.

• Do not confront rioters or looters to prevent property damage of looting of merchandise. Protect employees and customers from injury. Remind managers and employees, and customers as necessary, about safety protocols.

• Protect surveillance records and safeguard areas touched by theft suspects in case of a “mob theft event”.

• After event:
  – Cooperate with police or local authorities.
  – Provide copies of videos and witness statements as directed by corporate office and legal department.
  – Critique event response. Obtain local management and hourly employee feedback.
  – Update policies and procedures as determined.
  – Enhance surveillance systems, building physical security and safety, and staffing as necessary.

**Conclusion**

Civil unrest and disturbances are potential risks for most businesses, and no business is immune to it. The impact on your business depends on many factors, such as the event, proximity of location and type of business. A better understanding of these threats and vulnerabilities will help in a more comprehensive risk assessment. Completing a comprehensive 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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