NEW IMPULSE, NEW CHALLENGES. SAFETY PROCEDURES IN A PRODUCTION ENTERPRISE. A CASE STUDY

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Abstract: In connection with the entry into force of the Anti-terrorism Act, administrators of many production facilities are required to prepare a number of anti-terrorism procedures called anti-terrorist/AT attachment (Security plan related to facilities and equipment subject to mandatory protection in respect of terrorist threats). The article is a case study of the AT attachment implementation in several production plants belonging to one enterprise. It characterizes the strategy adopted in this company and the solutions developed in 2017-2019 in several production plants. The purpose of the article is to show why the implementation of this procedure is a challenge for the company.

Keywords: AT protection, AT attachment, critical infrastructure, security, safety culture

1. INTRODUCTION

The system-human-environment relationship has been shown in this article on the example of processes of significant change in security systems at industrial plants. These changes were forced by the Anti-terrorism Act (Journal of Laws [Dz. U.], item 904), and above all the so-called anti-terrorist/AT attachment (Security plan related to facilities and equipment subject to mandatory protection in respect of terrorist threats). The research project entitled NEW IMPULSE, NEW CHALLENGE took place in several stages. First, it assumed the analysis of 14 AT attachments developed for production plants located in Silesia (Wojtasik et al., 2019), the next stage was the analysis of the employee training system in several production plants (Wojtasik, 2019). The third stage of research concerns the overall assessment of the implementation of safety-related procedures. The purpose of this article is to analyze the process of implementing so-called AT attachment in production enterprises in the context of challenges for the enterprise. The purpose of the analysis is to show what this challenge is. The empirical reference system is an enterprise with several dozen production plants, of which a dozen or so (facilities subject to mandatory protection and / or critical infrastructure) have prepared AT attachments and training on the AT safety procedure has been conducted there. The exact location of the company, the branch and the characteristics of individual plants are known to the author of the article, although for safety reasons they have been anonymized.
2. THEORETICAL SYSTEMS OF REFERENCE
Anti-terrorism incorporates the practice, military tactics, techniques, and strategy that government, military, law enforcement, business and intelligence agencies use to combat or prevent terrorism. There is no single binding definition of antiterrorist system in Poland. However, it can be defined as all state structures, including in particular law enforcement agencies and their separate components, intended to prevent and respond to terrorist threats (Piekarski, Wojtasik, 2020). From the formal side, the system has been underpinned by Anti-terrorism Act from 10 June 2016 (Journal of Laws [Dz. U.], item 904) since 2016. Earlier this role was partly fulfilled by the Crisis Management Act of 26 April 2007 (Journal of Laws [Dz. U.] from 2013 item 1166 and from 2015 item 1485), which, however, included a narrower scope and, for this reason, is sometimes referred to as the "small anti-terrorist law". The definitions adopted in the Anti-terrorism Act define anti-terrorist activities as "activities of public administration bodies consisting in the prevention of terrorist events, preparation for taking control over them through planned projects, response in the event of such events and removal of their effects, including restoration of resources intended for to respond to them" (Article 2 point 1 of the Act). A terrorist offense is defined in art. 115 § 20 of the Penal Code (Journal od Laws [Dz. U.] from 1997 No 88 item 553.) Pursuant to this provision, any offense punishable by imprisonment, the upper limit of which is at least 5 years, committed to: 1) seriously intimidating many people, 2) forcing a public authority body of the Republic of Poland or another state or body of an international organization to take or refrain from specific actions, 3) causing serious disturbances in the system or economy of the Republic of Poland, another state or an international organization. It can also only be an act of threatening to commit such an act.

The Anti-terrorism Act defines the principles of conducting counter-terrorism activities as well as the framework for cooperation between the authorities competent to carry out these activities, complementing their basic powers in this respect. In the field of identifying and preventing terrorist threats, the Internal Security Agency (ABW) is the leading force. From the very beginning of this service, its tasks included "recognizing, preventing and combating threats to the internal security of the State" and "recognizing, preventing and detecting" crimes referred to as "terrorism" and similar to it, including the illegal manufacture, possession and trade of weapons and explosives. According to the current regulations, the preparation of a security plan for enterprise which is a subject of mandatory protection requires participation of the Internal Security Agency - ABW (in respect of terrorist threats).

3. ANTI-TERRORIST ATTACHMENT TO SECURITY PLAN
According to the data provided by the Police Headquarters (Komenda Główne Policji), within the territory of the Republic of Poland there are 3518 structures subject to mandatory protection (situation at 31 December 2018), of which 347 are located in the Silesian province and a similar number 350 - in the Greater Poland province which is the highest number in the country. Legal definition says, that mandatory protection means: protection of areas, structures, equipment and shipments crucial to the defence and economic interest of the country, public security and other important interests of the country provided by specialist armed units or adequate technical protection, in accordance with the relevant provisions of the People and Property Protection Act from 22 August 1997 (Journal of Laws [Dz. U.] from 2014, item 1099 and from 2015, item 1505). Article 5 of the said act divides areas, structures and equipment into groups according
to the following categories: national defence, protection of the economic interest of the country, public security, protection of other important interests of the country and additionally: structures (including buildings), equipment, installations, services included in the uniform list of structures, installations, equipment and services which are part of the critical infrastructure. Detailed lists of areas, structures and equipment are prepared by: the President of the National Bank of Poland, National Broadcasting Council, ministers, heads of central offices and governors with respect to subordinated or supervised organisational offices. Inclusion of a given area, structure or equipment in this list is made by means of an administrative decision. Governors keep record of areas, structures and equipment subject to mandatory protection located within a province (Wojtasik et al., 2019).

An administrator of a structure (area or equipment) present on the confidential provincial list of areas, structures and equipment subject to mandatory protection is obliged to prepare and submit to the correct division of the Internal Security Agency the so-called anti-terrorist attachment, i.e. protection scheme of a structure (area or equipment) in respect of terrorist threats. The acceptance procedure of a security plan of an area, structure of equipment subject to mandatory protection against terrorist threats available on the Internal Security Agency’s webpage specifies that an AT attachment should consists of: first page form, table of contents with page numbers, table with terrorist attack risk assessment (with risk level to a given area, structure or equipment), personnel evacuation procedure in case of a terrorist threat which takes into account the nature of the attack (attack using firearms and sharp tools; attack using explosives; chemical, biological, radiological and nuclear attack), the scope of actions undertaken on each state of alert (does not include the CRP states of alert) stipulated in the Anti-terrorist Act (ALFA, BRAVO, CHARLIE, DELTA) in an administrative area where the area, structure or equipment subject to mandatory protection is situated and contact information necessary for mutual cooperation: the address of a facility (structure, area or equipment), fixed telephone number and e-mail address. When the consultations and preparation is performed by a person appointed by the facility administrator, it is necessary to issue an authorisation. AT attachment is a non-classified document. Receiving acceptance takes place as follows: a draft of the AT attachment is prepared and submitted to the competent local office of the Internal Security Agency; if necessary, the director makes required adjustments; 2 paper copies of the AT attachment are submitted to the Internal Security Agency local office which then either accepts the AT attachment or rejects it and sends the 2 copies of the document back with appropriate annotations. Subsequently, the Internal Security Agency local office informs the competent provincial chief of the police (or the Commander-in-Chief of the Police) that the attachment was accepted or rejected. The procedure in its present version has been in force since 1st January 2017. (Wojtasik et al., 2019)

4. THE IMPLEMENTATION PROCES
Between 2017-2018, AT attachments for a dozen or so production plants included in the characterized enterprise were prepared and accepted by Internal Security Agency (ABW). In 2018-2019, a training system for employees (about 1,000 people) was designed and developed, and then these trainings were carried out. In 2018, AT exercises were also held as part of an undertaking implemented in cooperation with law enforcement agencies and institutions reporting to the voivode.
The introduction of the legal obligation to develop the AT attachment has initiated in many enterprises the process of significant changes related to the reorganization of the procedures and designing the new ones. Firstly, reorganization of existing procedures related to security. The AT attachment’s requirement was to indicate persons responsible for performing specific procedures - notifying employees about evacuation, conducting evacuation, etc. This allowed to formalize the existing state of affairs or introduce new solutions. Secondly, the procedures related to receiving correspondence had to be ordered in a similar way - a precise indication of who is authorized to receive it, control it, and where these activities should take place. The AT attachment contains the procedure to be followed in the event of a suspected consignment being received, therefore it was necessary to develop a procedure to deal with the above. Thirdly, preparing new or updating existing site maps including fences, all facilities, entrances, exits, etc.

In similar production companies problems may arise at the first stage. Firstly, the AT attachment is a detailed document describing AT procedures and how to respond to different kinds of attacks related to terrorism (attack using firearms and sharp tools; attack using explosives; chemical, biological, radiological and nuclear attack). Usually it has several dozen pages and 3 situational maps. Its development requires several visits to the production plant, few meetings with the facility management, familiarization with the security system. These are tasks that require a lot of time and commitment. If the company does not have the appropriate human capital, AT attachments are prepared by external entities, which generates high costs. If the AT attachment is prepared by an employee of the enterprise, he/she is excluded from duties for a long time. AT attachment is a novelty. There are no models, good practices and recommendations regarding AT procedures. The person preparing the AT attachment gets a very difficult and time-consuming task. Secondly, the procedure for accepting the AT attachment with the relevant Internal Security Agency (ABW) delegation is lengthy. Even if the document does not require corrections (very rarely), it may take several months. If multiple attachments are need, the process will take longer. Thirdly, in many cases, each separate enterprise requires a separate AT attachment, i.e. the number of documents is multiplied. AT attachment must be kept at the enterprise headquarter. Therefore, it is necessary to organize a properly secured place (e.g. armored cabinet) for storing several documents. On the one hand, documents must be protected and on the other should be easily accessible in the event of dangerous situation. Fourthly, many production plants are objects consisting of a dozen or several dozen buildings, occupying a considerable area. That is why cooperation with the administrators of these facilities is crucial - they are usually plant managers, who at the stage of preparing the attachment should be made aware of the importance of this document and show in a broader context why terrorist threats should not be underestimated.

In addition, procedures of developing AT attachments and accepting them by Internal Security Agency (ABW) begins the next stage – implementation. A significant problem appeared already at the stage of planning the implementation of AT attachments. A serious challenge is to familiarize the entire crew, i.e. in this case over 1,000 people with the procedures contained in AT attachment. Many manufacturing plants work in shifts, employees must be familiar with the procedures during a normal working day when they perform their usual duties, which raises organizational and logistical difficulties. In addition, in the case of the analyzed enterprise, but also many similar ones, an important problem is the need to prepare a separate attachment for each of the many facilities -
different and diverse in terms of space layout, production, number of crews and the number and type of protection. The plants are distant from each other even by several dozen kilometers, which means that the control of the facility, familiarizing the crew with the documentation and all activities related to the implementation of procedures are additionally hindered. A team responsible for implementing the procedures faced a number of challenges. First of all, it is necessary to check periodically whether the state of the facilities and infrastructure corresponds to the drawings and situational maps in the AT attachments. Each emergency procedure described in the AT attachment also requires the development of a detailed situational map, which will include all elements of the plant's infrastructure, fences along with the location of entrances and the location of safe evacuation places (external and internal) and the location of alternative evacuation places. Maps developed according to the above guidelines have been developed for each of the objects functioning within the enterprise. However, in the case of large production plants, repairs, fence repair, installation of additional protections and similar activities are frequent and natural, although they are associated with significant changes in the infrastructure of the facilities. Therefore, all changes of this type should be monitored to avoid the situation when during the repair of the fence the gate leading to the external safe place of escape is removed or the door that leads to the internal safe place of escape is removed, which significantly violates the procedures set out in the Attachment. All changes must be checked for evacuation procedures listed in AT attachment. Secondly, it was necessary to familiarize the entire staff with AT Attachment in manufacturing plants. For the procedure to work, every employee must know it, know how to identify a possible threat, notify the functionaries and evacuate to the right place, etc. Functionals (foremen or shift masters) and security staff play a very important role in the procedures and the burden of evacuation of personnel in the event of a threat will rest on them. Thirdly, the document must be available to security guards. In many industrial plants, security services or some of these services, are provided by external security companies selected in tenders that support the operations of the Internal Security Service (Wewnętrzna Służba Ochrony). Employees of these companies exchange both between objects, and often rotate between employers, which results in the fact that new security personnel and sentries appear on the objects. As many of the procedures contained in attachments require a reaction and specific security tasks provided by AT security procedures to be performed by the security personnel, it becomes extremely important to familiarize each newly recruited security guard with the AT attachment, as well as to ensure that the document is physically in the guardhouse / security room (Wojtasik, 2020).

Taking into consideration above circumstances, a strategy for implementing the AT attachment was adopted, which consisted of several stages. The first stage concerned facility managers. It was primarily up to them whether the implementation of the procedures would be successful at individual facilities, because their attitude and decisions depended on how employees would treat AT procedures. That is why, first of all, they had to be made aware of the threats posed by terrorism and radicalization. It was decided to organize a workshop only for facility managers. During the workshops, an external expert discussed in detail the threats arising from the activities of Salafi terrorist organizations, showed the modus operandi of the perpetrators of terrorist attacks and showed the visual materials produced by these organizations. Threads related to the participation of Polish citizens in the activities of terrorist organizations, various faces of radicalization were also discussed as well as it was shown that a Polish citizen, who
knew the local conditions well, etc, could well organize a terrorist attack (the case of Paweł R.). This stage was needed so that when developing the attachment do not come across doubts or belief about the uselessness of introducing such a document in a safe country. Secondly, it was decided that the most effective way to familiarize the crew with AT Attachment would be to conduct training in AT procedures that would include all employees of individual plants. It was a difficult decision, especially since the company employs over 1,000 people. The following assumptions were made: training groups were to be max. 25 people, which allows organizing effective training; the training should not last longer than 2 hours, it was also decided to combine training on the procedures contained in AT attachment with training on correct behavior in an emergency situation, modeled on materials made available by the Internal Security Agency. The training planned in this way had several purposes; first of all, to familiarize employees with AT procedures contained in the document, in addition to raise the level of crew awareness in the field of safety at work and in everyday life, show real threats and ways to respond in crisis situations, as well as create a space for dialogue with employees on safety and security.

5. CONCLUSIONS AND RECOMMENDATIONS
After analyzing the 3-year process of creating, agreeing and implementing AT procedures, a number of conclusions and recommendations were developed.
1. The development and implementation of AT procedures is a long and demanding process that requires commitment and time consuming. It is necessary to appoint a specific person responsible for the overall process. It is possible that there will be need to hire a new employee or change the scope of tasks so that the whole process is fully planned and controlled.
2. AT attachment and the procedures contained therein are useful to the extent that the crew is aware of their existence, is able to apply them and knows the patterns of action in the event of various types of hazards. The existence of a document will not increase the level of security in an enterprise. Actual knowledge of AT procedures among the crew is required.
3. Entering specific arrangements in the attachment – AT training every two years, AT drill every four years cause that even if the employees responsible for safety will be changed, a high level of care for AT procedures will be continued.

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