

Revo

Retail. Property. Community.

Guidance for general managers:

Integrated safety management and major incidents in retail places.

epc | Advise
Educate
Exercise
Implement

Introduction and scope	2
The context – challenges in the shopping centre environment	6
Defining the major incident	9
Addressing business continuity management	9
The components of integrated safety management	10
Anticipation and assessment	10
Prevention	15
Preparation	15
Response	16
Recovery	22
Conclusion	24

Introduction and scope.

This guidance is aimed at the managers of retail and leisure environments, in particular shopping centres. It sets out the general principles and good practice associated with a model called Integrated Safety Management (ISM), at a non-technical level. The purpose is to give general managers enough understanding to confidently assure themselves that the technical business of planning for major incidents in their centres follows accepted and robust guidelines. ISM is the start-point because major incident management will seldom, if ever, work without a context of systematically managed activities that develop this capability in the organisation and its people.

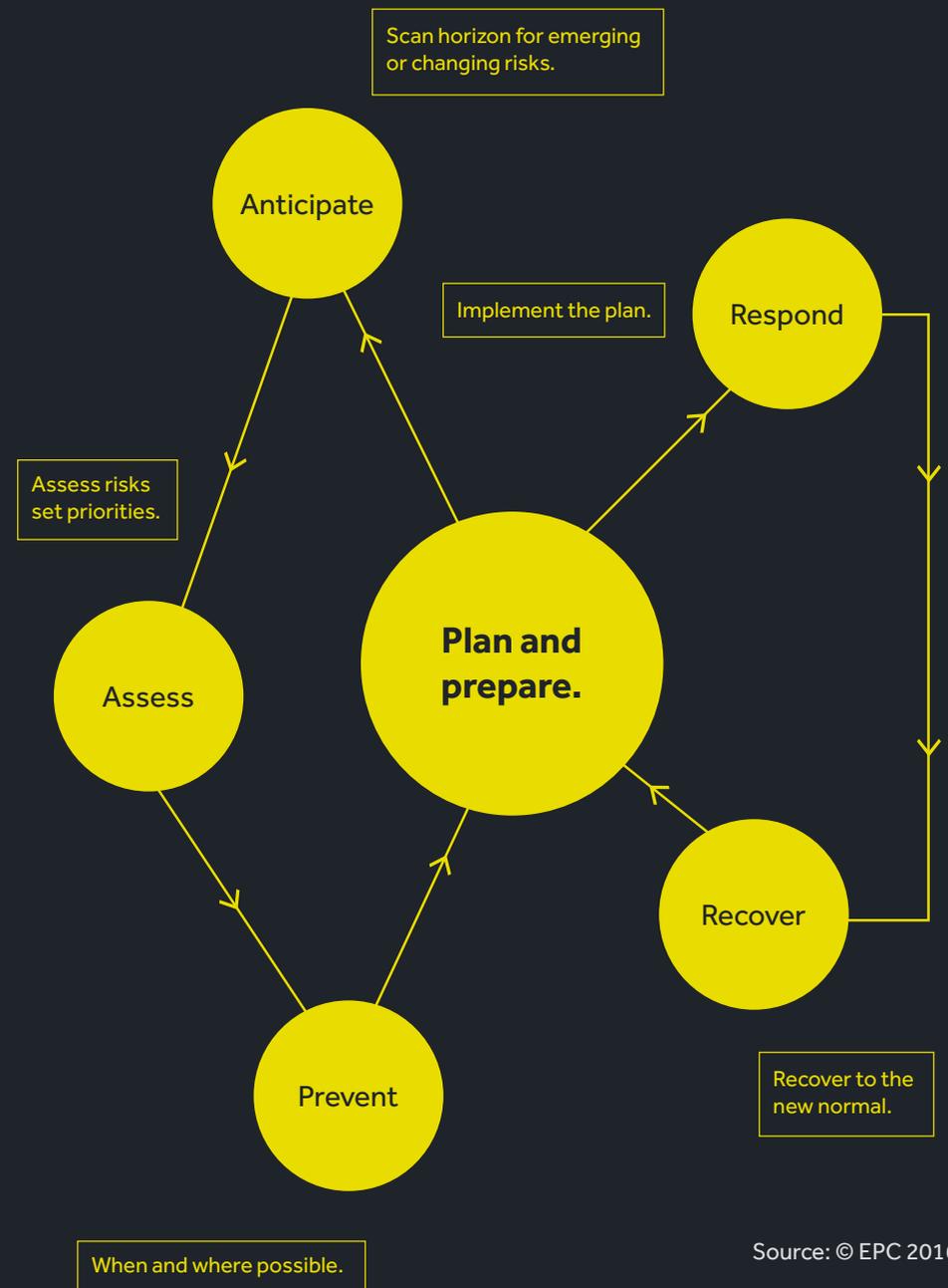
As such, this is capstone guidance. The intention is to follow it up, in due course, with more detailed guidance suitable for practitioners. This will be a suite of papers addressing different aspects of ISM, aimed at those who design and implement its associated processes and capabilities.

No prior knowledge of major incident management is assumed. The guidance covers:

- preparing (risk, planning, training and exercising);
- responding to major incidents; and
- recovering from major incidents.

As the name suggests, ISM is an integrated, holistic and iterative (life-cycle) model. It is based on (but adapted from) the basic approach of the civil emergency management community. It has been the standard framework for continuous improvement in major incident management for some 25 years. It is, therefore, a dynamic mechanism which is tried and trusted. It has proved to be flexible, adaptable to many environments and coheres with good practice in the emergency services, local government and the health services – as well as the rest of the civil emergency management community.

Figure 1: The cycle of integrated safety management (ISM)



The definition of a major incident, and its relation to other types and levels of management, are discussed in more detail below.

For the purposes of this paper a major incident is defined as:

An event or situation, with a range of serious consequences, which requires special arrangements to be implemented by one or more emergency responder agencies.

The purposes of major incident management are to:

Minimise the risk to human life and wellbeing.

Provide a framework for planning, preparation and response by centre staff.

Minimise the risk to property, infrastructure and environment.

Provide a framework for supporting the emergency services effectively.

Reduce or avoid losses.

Reassure the public and stakeholders that reasonable steps have been taken to manage major incident risks.

Minimise the length of time the centre will have to suspend or disrupt trading.

Protect the brand, value and reputation of the centre.

The context. Challenges in the shopping centre environment.

Shopping centres have many aspects that, collectively, make them particularly challenging environments for major incident management. These include the following, in no particular order of relative importance. They are listed here because they contribute to the risk landscape of shopping centres and complicate the achievement of integrated and coherent major incident management. The list is not intended to be exhaustive:

- large and diverse populations of staff and visitors, often in relatively confined and out-of-town locations; footfalls that often exceed the original design assumptions of the centres, and represent groups that have a wide variety of purposes in being there;
- as complex (perhaps iconic) structures and crowded places, they present a diverse range of risks of both the accidental and malicious varieties;
- they increasingly tend to host activities that they were not primarily designed for (such as popular entertainment events);
- they are prone to seasonal and occasional surges in footfall, some of which (such as Black Friday) are associated with different norms and standards of public behaviour;



- they may be co-located with sports and other entertainment venues that attract diverse crowds;
- staff need to be able to manage crowd behaviour effectively. This is especially important given that they tend to encourage unstructured, free mobility in normal business, but need to quickly impose order, discipline and direction when an incident occurs;
- the multiple, embedded business functions taking place in a large centre may be subject to different safety regulations, operating cultures and commercial priorities;



- there may be diverse, multiple and fragmented patterns of ownership, management and tenancy, which make coherent planning and incident management more difficult;
- they may have large, complex estates with critical business and safety dependencies on ICT, local road networks and essential utilities;
- they often have high turnover of relatively unskilled staff, which can produce challenges in maintaining consistent levels of training and competence;
- staff and visitors may be linguistically diverse, which can raise communication issues;
- they are family visitor locations, which combine high customer expectations of safety and security with low thresholds of tolerance for restrictions placed on free movement;
- they are microcosms of society, and at any one time their population can be expected to include people with various vulnerabilities and particular safety needs – which can become the responsibility of the operator in extreme situations;
- access, progress and egress may not be fully controlled or monitored, leading to some potential uncertainty about how many people are in the complex and specifically where they are.

Defining the major incident.

This guidance concentrates on the major incident, but it is useful for clarity and definition to relate the concept to more common, less disruptive incidents and to strategic crisis management. The latter, with its focus on challenges to brand, image, value, reputation and corporate liability, may follow a major incident or proceed in parallel with it. It is, however, outside the scope of this guidance. Readers are referred to British Standard 11200: 2014 Crisis Management: Guidance and Good Practice. The Emergency Planning College (EPC) co-authored this Standard.

Addressing business continuity management.

This guidance focuses on the incident management (IM) capability found in resilient shopping centres. IM includes the command, control, co-ordination and communications components required for an effective response to a business disruption. A business continuity management system (BCMS) enables an organisation to define and prioritise its business critical activities. In short, IM give you the structure and processes to manage an incident whereas BCM helps you define the business critical services that need to be maintained and recovered to a pre-determined level.

The components of integrated safety management.

Anticipation and assessment.

These stages are about the identification and understanding of the risks of a major incident occurring.

In any well managed organisation, and especially in one so complex as a shopping centre, the anticipation and assessment of risks to the public should be an integrated part of wider risk management processes.

They should attract a high priority. Several key factors need to be borne in mind:

Accountability.

Overall responsibility for safety cannot be delegated and rests with the highest level of management.

Clarity.

Roles, powers and reporting lines in respect of major incident management should be clear, formally recorded and embodied in job descriptions. They must also be reviewed periodically and kept up-to-date.

Co-ordination.

In complex environments like shopping centres risks must be managed coherently and strategically. The potential safety impacts of any decision that might change the risk landscape must be evaluated, remembering that even apparently trivial changes can have disproportionate consequences.

Continuity.

As well as developing an incident management capability (which defines the who and how of a response), consideration must also be given to business continuity (which determines what critical services you need to continue and what can you stop doing?).

Culture.

The effective management of safety in shopping centres requires leadership to develop, embed and promote a culture of safe operation, disciplined behaviour, openness and a willingness at all levels to challenge infractions. Incremental slippage into bad practice in safety management may not be noticed at the time, but is often identified in the incubation of major incidents. Standards must be identified, explained and maintained rigorously.

There are a number of sources of useful and current guidance on major incident risks. These include:

For malicious attack risks:

- NaCTSO
- Police Counter-Terrorism Security Advisors
- National Police Chiefs Council - Run, Hide, Tell
- Centre for the Protection of National Infrastructure (CPNI)

These organisations can be contacted via the local police.

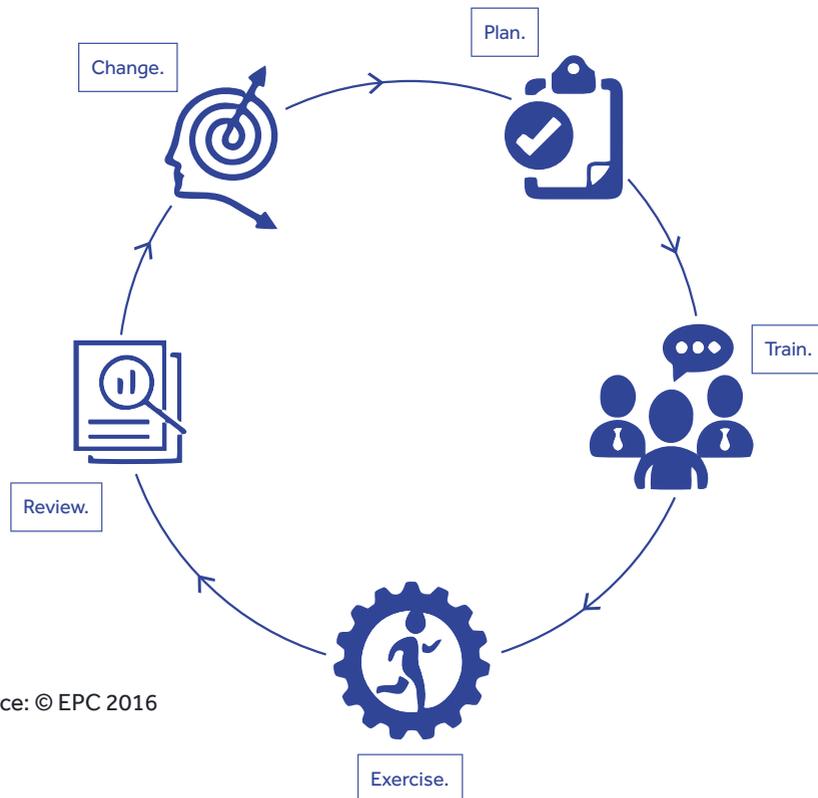
For natural hazards and major accidents:

- The local Community Risk Register (produced by the county emergency management community – or Local Resilience Forum)
- The National Risk Register
- Floodline (Environment Agency)

This information can be accessed on the internet.



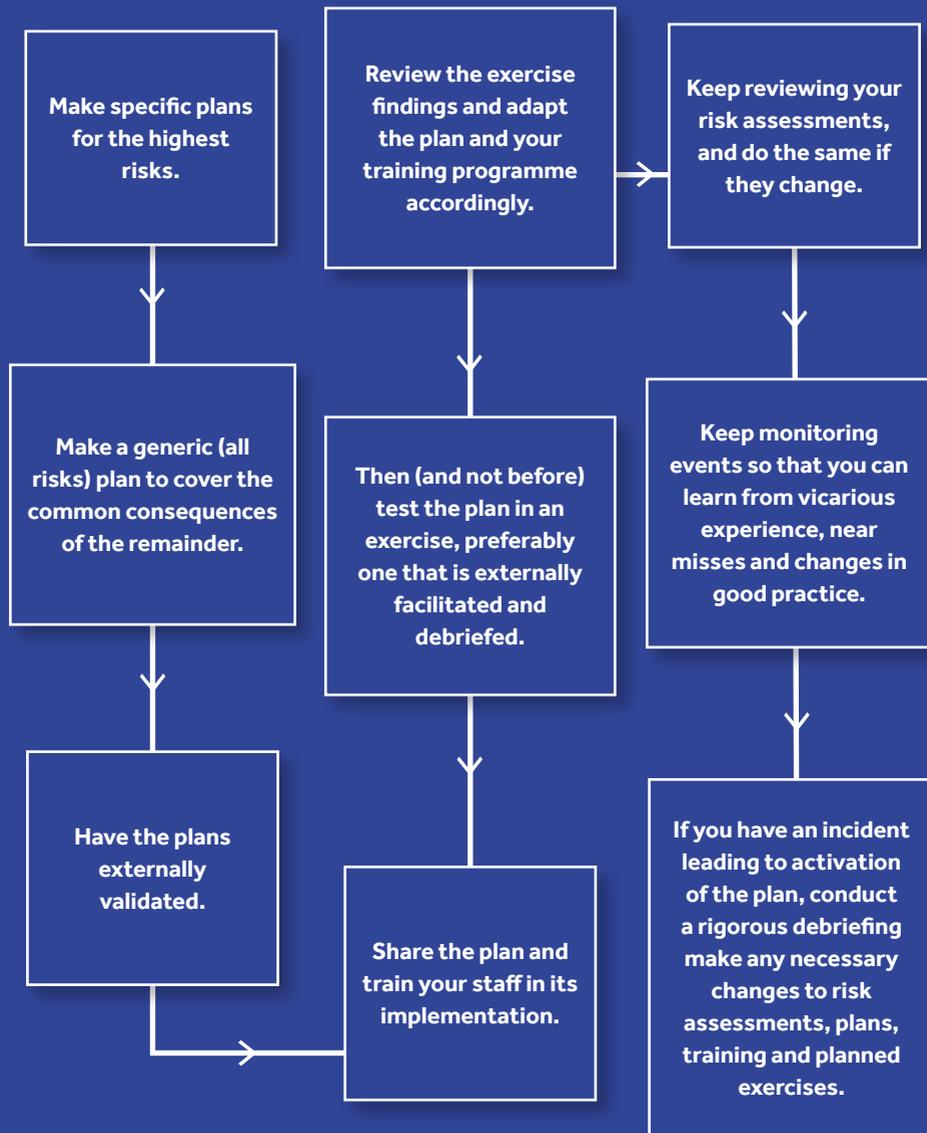
Figure 2: A Model of planning, training and testing.



Source: © EPC 2016



The key recommendations are:



-

Prevention.

Despite the above, not all major incident risks can be prevented from occurring. However, much can be done to prevent them from reaching avoidable levels of likelihood and impact. A good safety culture, and effective security measures, will drive down likelihood. Good preparation, training and the testing and development of a response capability should mitigate impacts, reduce losses and build competence. Your major incident might not be avoidable but the good application of ISM will increase your ability to prevent it becoming a crisis for your organisation. It should be remembered that one of the common causes of major corporate crises is a badly managed incident, especially when reasonably foreseeable risks are perceived to have been missed or not mitigated professionally.

-

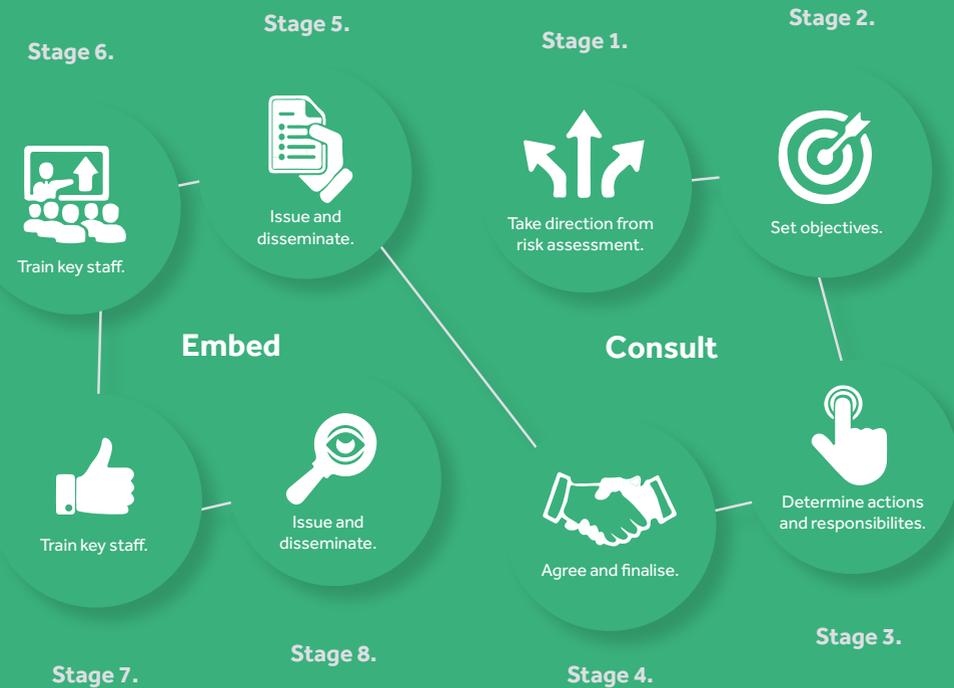
Preparation.

Preparation involves the activities which give organisations and people the capability to respond successfully and mitigate the consequences of a major incident. It is based on the assumption that no matter how comprehensive an organisation's prevention measures are, incidents can still happen.

Preparation is a challenge and this is especially true in complex environments like shopping centres. However, a systematic and managed approach to capability development can make a serious and beneficial difference. We recommend that shopping centres work within a cyclical model of planning, training and testing.

Planning itself requires a systematic model and we recommend the following one, in order to ensure rigour and good practice:

Figure 3: A model of major incident planning



Response.

A major incident will, by definition, normally involve intervention by the emergency services. The police will assume command of the scene, although the fire and rescue service may be responsible for health and safety in the immediate area affected by events such as a fire, explosion, building collapse or hazardous material release.

The responsibilities of the shopping centre management and staff may be summarised as follows (not in order of suggested priority):

- Initiating the centre’s control facilities, activating its major incident plan and directing the response until the emergency services arrive.
- Making all reasonable effort to protect the lives, safety and health of the public and your staff.
- Taking prompt action to prevent a situation from becoming worse;
- Briefing the emergency services on the situation when they arrive and the actions taken so far.
- Being ready and equipped to provide the emergency services with information and guidance, such as building plans, site maps, on-site hazards and unaccounted-for people;
- Initiate your business continuity arrangements.
- Open and maintain contact with key stakeholders, such as corporate management;
- Assist the emergency services as requested, which might include appointing a single point of contact for liaison with them.
- Establish the scale of the business recovery task and begin planning for it as early as possible.
- Make arrangements for the safety of the site after the emergency services have withdrawn.
- Identify and be prepared to communicate key messages to the public and the media.

This will need a set of command and control arrangements, which can be rapidly activated. The emergency services operate a three-tier model of command and control in major incidents. It is sometimes referred to as “Gold-Silver-Bronze”.

Nickname	Function	Purpose
Gold (or strategic)	Strategic overall leadership	Directing
Silver (or tactical)	Co-ordination of all activities to deliver what has been directed by Gold	Co-ordinating
Bronze (or operational)	Carrying out actions at the scene	Doing

Adopting this approach has certain merits for the shopping centre environment:

It works. It usefully distinguishes the responsibilities and roles of front line operators, managers and senior corporate leaders.

It ensures that roles are disaggregated and clearly defined according to level and function.

It is a unified command structure, which is a fundamental requirement.

It will make sense to the emergency services.

It has a strong track record of success and has become something of an “industry standard”.

It is simple and easy to understand.

However, it needs some adaptation to make it suitable for shopping centres. The following table suggests how it might be used to mirror the business-as-usual management structure of a typical centre.

Emergency Services title	Retail centre equivalent	Function
Gold (or strategic)	Centre Director/Manager or the most senior available manager. May not have to be on site and could be at board level – depending on the structure of the organisation. One person only in this role at a time.	Defines the strategic aim Approves the plans and actions of the silver co-ordinator to ensure they deliver the aim Will deal with shareholders, corporate HQ, logistic requirements and the media.
Silver (or tactical)	Centre Operations Manager or nominated deputy. One person only in this role at a time.	Directs and co-ordinates operational level staff to deliver the strategic aim.
Bronze (or operational)	Business unit managers and supervisors. May be several working under a single overall person.	Manage the team or teams who will actually complete the tasks directed by silver. Provide Silver with dynamic updates.

Clearly the make-up of these tiers will vary from centre to centre. In some larger organisations a team may be established, and in some smaller environments, there may be single operatives performing these roles or even acting across tier boundaries.

At the very early stages of the incident, staff may be acting in roles not normally allocated to them, but then be replaced as a structure is imposed. Staff and managers must expect to respond to circumstances on their own initiative and not wait for the command and control system to be activated.

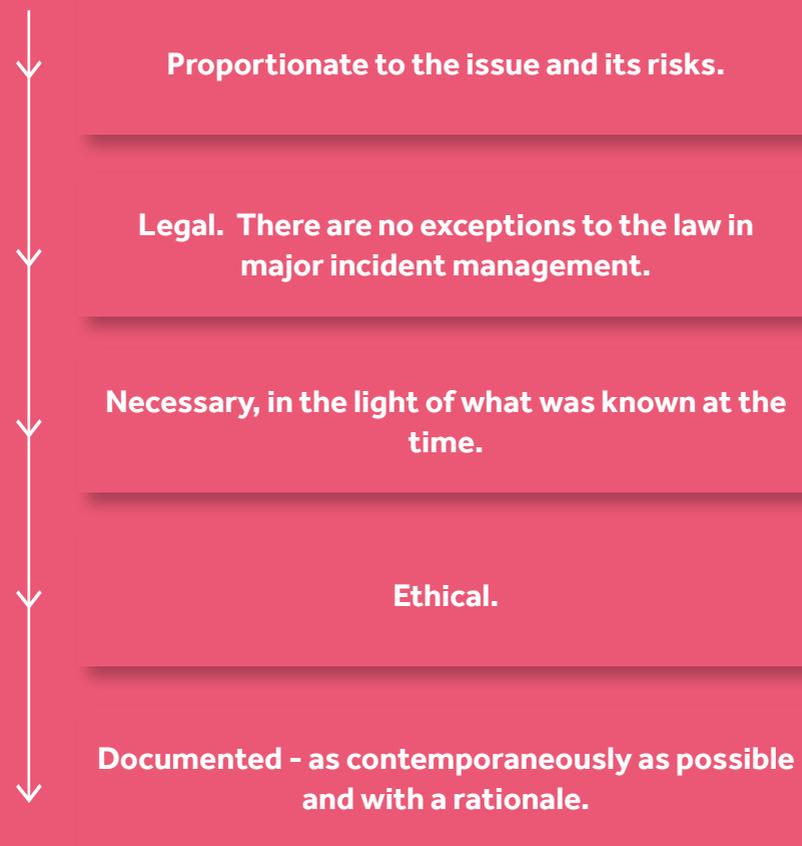
Note that the structure is scalable. For example, the Gold level may be no more than an individual on the end of a telephone in contact with Silver; it will be for that individual to determine where she/he should be and how much contact with Silver they require.

The main functional requirements of a leader at any of the three levels of command and control are:

- To ensure that they understand the situation to the greatest extent possible, in terms of:
 - What is happening?
 - What does it mean (i.e. what are the implications?)
 - What might happen next?
- To ensure that this understanding is checked and shared with others, so that a common understanding exists.
- To define, or ensure that they understand, the overall aim of the response.
- To make timely and effective decisions, choosing actions and priorities that best support the achievement of the aim.
- To continuously monitor progress, performance and outcomes.
- To periodically review the aim and their decisions to ensure that they remain suitable.
- To dynamically review existing and potential risks.
- To assess the effectiveness of the business continuity arrangements in place.
- To ensure that people have the resources they require for their tasks.
- To deliver crisp, effective briefings.
- To record decisions in ways that make them robust in the face of later scrutiny.
- To communicate proactively with peers, subordinates and senior leaders.
- To be aware at all times where their human and material assets are, what they are doing and ensure their health and safety.

To help with effective, consistent and defensible decision-making, we recommend the use of a standard decision model. This is the national decision-making model used by all three emergency services. Using a standard, accepted model not only lends rigour to decision-making; it can also increase decision makers' confidence in their choices and makes them more justifiable after the event – when exposed to invasive scrutiny.

The key issue with decision-making in extreme situations like major incidents is that decisions do not have to be always correct. They may be revealed to be not entirely right in the light of subsequent developments or the appearance of information which was not available when the decision had to be made. But what they do have to be is:



This, and the means to do it, needs to be reflected in the centre's major incident arrangements

-

Recovery.

Recovery planning should start as early as possible, not necessarily waiting until the response is wound down. The business continuity plan should have arrangements that cover loss of personnel, key skills, estate and access to services and supplies. The Business Impact Analysis (BIA) part of the BCM capability should produce realistic assessments of recovery timelines which will be important to manage public and stakeholder expectations of when business can return to normal. The BIA process should also provide estimates of what the costs of restoration are likely to be and what losses might be incurred.

As well as maintaining business critical activities, BCM arrangements should also address plans to recover the shopping centre to business as usual. There may also be human factors to address, if disruption to staff and customers is likely to be prolonged or if fatalities and/or casualties are involved. Generally, the expectation is that recovery will take much longer than the response phase of any major incident.

We regard reviewing the response (debriefing) and learning lessons as part of the recovery phase. We suggest that when the response (or an exercise) is wound down it should be followed by a quick "hot" debrief. Some days later, after time for reflection and evidence gathering, we suggest a more developed and probing "cold" debrief – preferably not facilitated by those who managed the response. From this, a list of lessons should be identified and agreed. Once those lessons have been implemented, with the necessary changes to risk assessments, plans and capability development programmes, they can be said to have been "learned".



-

Conclusion.

This is a short overview of key themes, appropriate to the nature of this document as capstone guidance. By way of a conclusion, it is worth pointing out a common feature of post-major incident reporting. It is relatively rare for the front-line responders to be criticised directly. People tend to rise to the occasion and often show outstanding professionalism and dedication. In fact, criticism is more likely to attach itself to managers. But the most common type of criticism concerns communication between people and co-ordination between teams. When these fail, the best efforts of the finest people can become compromised.

This explains the focus in this paper on shared understanding and the use of common, systematic models to guide teams through the collective process of developing a major incident management capability. Hopefully, it will give the general manager knowledge and literacy in the general principles, concepts and practicalities of major incident management – enough to give him or her confidence in the direction and oversight of the technical work of their planners and practitioners.

-

Emergency Planning College Guidance.

At the EPC we use guidance to define, for the information of the practitioners and partners we train, our institutional standpoint on good practice in resilience, emergency and crisis management. They are free downloads from the Knowledge Centre on the college website. As such they are a part of our Public Programme and a pro bono service to the resilience community.

Please note that, whilst they represent our current understanding of good practice and will always be consistent with relevant and formal published guidance, doctrine and standards – they are designed to complement – not replace – formal government guidance. As statements of good practice they do not imply direction or mandate from central government. When they refer to specific products, models or methodologies (used to translate doctrine into practice) this does not constitute CCS endorsement or recommendation of the same. As with our Occasional Papers, which have more of a discursive nature and purpose, they are peer-reviewed and subject to rigorous quality assurance to ensure that they will contribute effectively to the needs of practitioners and the customers and partners of the Emergency Planning College.

Revo

Retail. Property. Community.

epc | Advise
Educate
Exercise
Implement

This report has been produced for and on behalf of Revo by the EPC.

© The Emergency Planning College (EPC) 2016

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording or otherwise without the permission of the publisher.

Applications for reproduction should be made in writing to The Emergency Planning College, The Hawkhill, Easingwold, York, YO61 3EG.

revocommunity.org

Charter House, 13-15 Carteret Street
Westminster, London SW1H 9DJ
+44 (0)207 222 1122 hello@revocommunity.org