



**Kocaeli Hastane Yatırım ve Sağlık  
Hizmetleri A.Ş. (Kocaeli or SPV)**

**Kocaeli Integrated Health Campus Project  
(KİP)**

DOCUMENT NUMBER:

**KİP-ESMS-SRA-001**

DOCUMENT TITLE:

**SECURITY PLAN AND SECURITY RISK  
ASSESSMENT – FINAL**

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**SECURITY MANAGEMENT PLAN-rev01**

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**PURPOSE SCOPE**

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards, IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

The purpose of this plan is to provide the general approach for developing and implementing a thorough training and awareness program on the management of environmental, social, occupational health and safety issues to relevant parties involved in the Project during the Construction phase.

It includes guidelines and minimum requirements for EPC Contractor for defining its own procedure appropriate to the nature and scale of the Project Construction phase.

**APPLICATION**

This Management Plan applies to the Project Construction phase only; the Operation phase aspects will be addressed in separate documents. It applies to construction work activities under the control of SPV, of EPC Contractor and Subcontractors and to all KİP employees.

**DEFINITIONS**

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or "KİP" or simply "Project"):	Kocaeli Integrated Health Campus Project, being executed by SPV or its affiliates
EPC Contractor (or simply EPC):	Gama -Türkerler Kocaeli Adi Ortaklığı & Gama Türkerler Dubai
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the EPC Contractor's personnel.
Environmental and Social Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the environmental, social, health and safety aspects of the KİP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance.
Guidelines to EPC Contractor	Guidelines to EPC for the development of its own ESMS and associated EPC Contractor Procedures appropriate to the nature and scale of the Project are contained in SPV ESMS documentation. SPV ESMS documentation, identify also minimum requirements and specific responsibilities for EPC Contractor in line with the EPC contract.
Construction Site:	The Construction Site includes all areas impacted in any manner by the construction activities.
Environmental and Social Management Plans (ESMPs)	Plans issued by SPV addressing significant Environmental and Social aspects (as identified in the ESA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.

**SECURITY MANAGEMENT PLAN-rev01**

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EPC Contractor Procedure	A procedure to be prepared by EPC, to be used by EPC to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.
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**ACRONYMS**

KİP	Kocaeli Integrated Health Campus Project
SPV	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Golder	Golder Associates Turkey Ltd. Şti.
BAT	Best Available Technology
CRD	Community Relation Department
CRO	Community Relation Officer
EBRD	European Bank for Reconstruction and Development
EDC	Export Development Canada
EHS	Environmental, Health and Safety
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ES	Environmental and Social
ESHS	Environmental, Social Health and Safety
ESA	Environmental and Social Assessment
ESMP(s)	Environmental and Social Management Plan(s)
ESMS	Environmental and Social Management System
ESAP	Environmental and Social Action Plan
EU	European Union
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HRD	Human Resources Department
HRM	Human Resources Manager
HS (or OHS)	(Occupational) Health and Safety
IFC	International Finance Corporation
ISO	International Organization for Standardization
KPI	Key Performance Indicators
OHSAS	Occupational Health and Safety Assessment Scheme
OPIC	Overseas Private Investment Corporation
PR	Performance Requirement (issued by EBRD)
PS	Performance Standard (issued by IFC)
QRA	Quantitative Risk Analysis
SEP	Stakeholder Engagement Plan
WHO	World Health Organization
TSF	Temporary Site Facilities (Includes; Camp or office areas and laydowns)
GT	Gama- Türkerler
Project	Kocaeli Integrated Health Campus – PPP Project



**TABLE of CONTENTS**

<b>PURPOSE SCOPE .....</b>	<b>2</b>
<b>APPLICATION .....</b>	<b>2</b>
<b>DEFINITIONS .....</b>	<b>2</b>
<b>ACRONYMS .....</b>	<b>3</b>
<b>1. PURPOSE AND SCOPE OF THE PLAN .....</b>	<b>6</b>
<b>2. BACKGROUND POLICIES, NATIONAL AND INTERNATIONAL STANDARDS .....</b>	<b>7</b>
<b>3. SECURITY ORGANISATION CHART .....</b>	<b>8</b>
<b>4. ROLES AND RESPONSIBILITIES.....</b>	<b>8</b>
4.1 Site Manager .....	8
4.2 HSE Manager.....	8
4.3 Security Manager .....	9
4.4 Security Supervisor .....	9
4.5 Security Guard .....	9
<b>5. RULES &amp; REGULATIONS .....</b>	<b>10</b>
5.1 Organizing Security .....	10
5.2 Access to Site and Permission .....	10
5.3 Electronic Entrance Control of Personnel.....	11
5.4 Description of Legislated Perimeter Fence/Security Barrier .....	11
5.5 Lighting.....	12
5.6 Types of Lighting - Continuous Lighting.....	12
5.7 Lighting Criteria.....	12
5.8 Emergency Access/Exit.....	13
5.9 Entrance Control of Vehicles at Project Site .....	13
5.10 Control on Movement of Materials .....	14
Security Patrols at Site .....	14
5.11 Uniform for Guards.....	14
5.12 Surveillance .....	14
5.13 On Site Training .....	15
<b>6. GENERAL RULES FOR SECURITY PERSONNEL .....</b>	<b>15</b>
6.1 Standard of Guard Force.....	15
6.2 Security Guard Comportment.....	16
6.3 Project Security Rules (Prohibitions) .....	16
6.4 Discipline Process .....	17
<b>7. PRIVATE SECURITY GUARD / COMPANY TRAINING .....</b>	<b>18</b>
<b>8. SECURITY RISK ASSESMENT .....</b>	<b>19</b>
<b>9. APPENDIX A- LAW ABOUT PRIVATE SECURITY SERVICES .....</b>	<b>22</b>
<b>10. APPENDIX B- TURKISH PRIVATE SECURITY COMPANIES STANDARTS .....</b>	<b>32</b>

**SECURITY MANAGEMENT PLAN-rev01**

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**1. PURPOSE AND SCOPE OF THE PLAN**

This Procedure has been developed in accordance with SPV policies, with the commitments undertaken by:

- Turkish regulatory framework,
- EBRD Performance Requirements (in particular PR 4),
- IFC Performance Standards (in particular PS4),
- The International Code of Conduct for Private Security Providers (ICoCA),
- ANSI/ASIS PSC 1 (Management Standard for quality of Private Security Company Operations,
- Voluntary Principles on Security and Human Rights
- Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices

These procedure has been developed to outline and describe the following best practises in conjunction with local and international rules, regulations and standard:

1. Principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of security personnel;
2. Reasonable enquiries to be made to ensure that those providing security are not implicated in past abuses and will train them adequately in the use of force, and appropriate conduct towards workers and affected communities;
3. No use of force is sanctioned except when used for preventative and defensive purposes in proportion to the nature and extent of the threat;
4. Procedures for coordinating and managing private security engaged directly by subcontractors.

This procedure has been developed to outline and describe Gama- Türkerler (GT's) approach and procedures for the management of security during the construction phase of the Kocaeli Integrated Health Campus – PPP Project. The procedure set the requirements for security. Key factors to be achieved are:

- Prevent entry of unauthorized persons or vehicles into the Temporary Site Facilities (TSF), and the construction site.
- Establish identification of all employees and visitors.
- Security of construction materials, plants and equipment.
- Prevent damage to plants and equipment due to vandalism and/or sabotage.
- Prevent unauthorized removal of materials and equipment.

**SECURITY MANAGEMENT PLAN-rev01**

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- Prevent alcohol, drugs, explosives and guns entering the TSF and the construction site.
- Checking of incoming goods and personnel in case of a heightened security threat.
- Deal with a terrorist attack.
- Detect fire at an early stage to initiate damage control and mitigation measures.

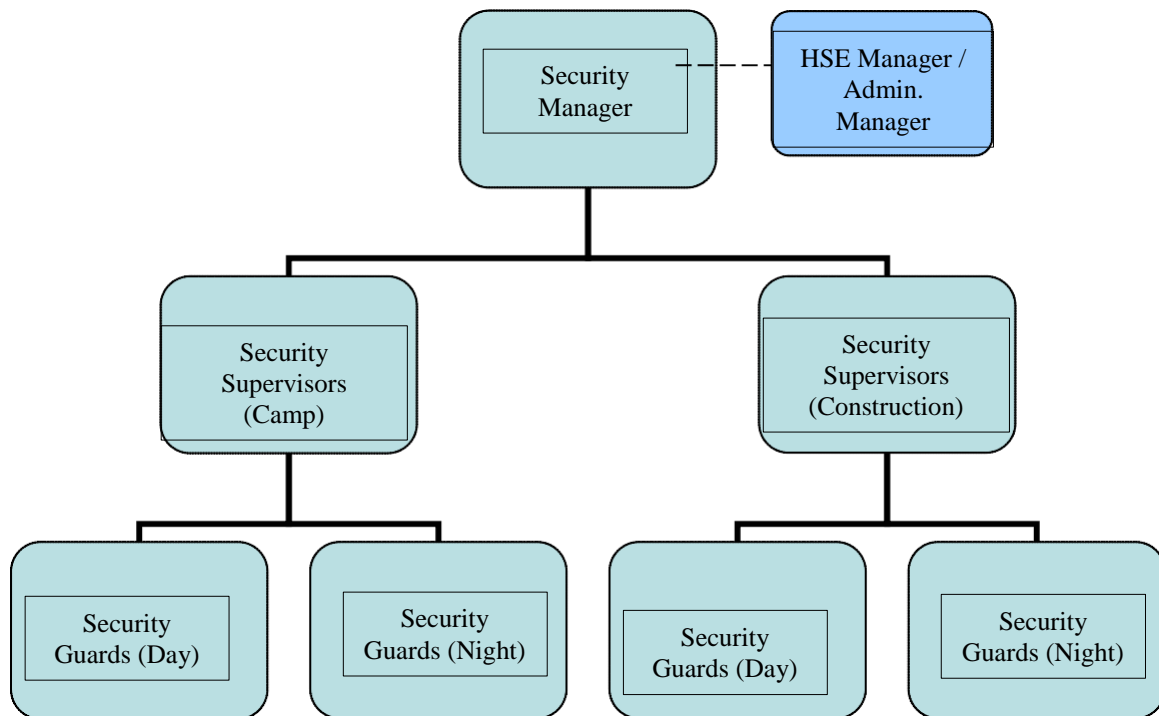
**2. BACKGROUND POLICIES, NATIONAL AND INTERNATIONAL STANDARDS**

This section includes the policies, standards and requirements of reference for this plan that are applicable, but not limited to, for the Project during Construction phase.

A number of qualitative performance parameters have been identified in section 4 below, derived from ESA commitments, Turkish regulation, IFC Performance Standards, EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC as well as from GIIP.

- Turkish regulatory framework,
- EBRD Performance Requirements (in particular PR 4),
- IFC Performance Standards (in particular PS4),
- The International Code of Conduct for Private Security Providers (ICoCA),
- ANSI/ASIS PSC 1 (Management Standard for quality of Private Security Company Operations,
- Voluntary Principles on Security and Human Rights
- Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices
- Turkish Law about Private Security (Law No. 5188)
- Info on 'Training for Security Services',
- Private Security Standards (TS 12782- Turkish Standards- Security Services – General Rules
- Private Security Standards (TS 156202- Turkish Standards - TS EN 15602 - Security service providers - Terminology )
- Training Standards described by Law No.5188, Article 14 (Training)

### 3. SECURITY ORGANISATION CHART



### 4. ROLES AND RESPONSIBILITIES

#### 4.1 Site Manager

- Overall responsible for the implementation of this security procedure.
- Make available the resources (including equipment, tools and personnel) necessary for execution of this plan and procedure.

#### 4.2 HSE Manager

- Coordination of all security activities within GT's scope of work (construction site and TSF).
- Responsible for the timely notification and report to the Site Manager about security incidents.
- Exercise authority to accept or refuse entry of vehicles into the project site.
- Ensure that identification badges provided for workers who have attended the HSE induction training.



**SECURITY MANAGEMENT PLAN-rev01**

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**4.3 Security Manager**

- Responsible for the managing and coordination of all security issues at construction site and TSF.
- Timely and adequate reporting of Security issues to the Site Manager and HSE Manager.
- Initiating new security measures whenever needed, under changed circumstances or other threat perceptions.
- Carry out necessary investigations in case of any breach of security and report to the Site Manager and HSE Manager.
- Ensure proper implementation of the security measures as mentioned in this procedure.
- Liaise with the HSE Manager and attend all briefings/meetings.
- Ensure that only properly trained and qualified security officers are employed.

**4.4 Security Supervisor**

- Responsible for organizing and coordinating of the guards 24 X 7, to ensure adequate coverage of the construction site, laydowns, site and the camp.
- Provide adequate and timely response to reports of guards about security problems and/or issues.
- Control physical implementation of the procedures as described in this document.
- Report to the Security Manager on daily security issues and observations, including weaknesses and threats.
- Carry out investigations, incident site inspections and assist security manager
- Ensure the emergency alarm system is working properly.
- Ensure the CCTV cameras (if in place) are working properly; events recorded and serviced timely.
- Ensuring that all security guards are fully aware of their duties and responsibilities.

**4.5 Security Guard**

- Control movement of personnel, vehicles, materials and visitors in their areas of responsibility.
- Execute access control measures as directed by the Security Manager.
  - Check that vehicles entering the site, laydown or the camp are authorised and have passes. If not, the access will be denied.
  - Maintain surveillance in their areas of responsibility and take appropriate crowd control measures in case of worker unrest.

**SECURITY MANAGEMENT PLAN-rev01**

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- Keep guard at the main entrance to the site or the camp and at the turn styles in the camp.
- Protection of properties within the camp and the construction area.
- Control/Inspection of workforces, staff and visitor on drugs and/or alcohol.
- Inspection of cars, buses and trucks upon entrance and exit to the camp and construction sites and ensure proper parking.
- Take appropriate fire protection and prevention measures and monitor Fire Alarm System.
- Watch over camp/site workforce and report any case of vandalism, sabotage ill-discipline, etc.
- Carry out patrolling as defined by the Security Supervisor,

**5. RULES & REGULATIONS****5.1 Organizing Security**

- All subcontractors are required to organize their own security during the phase of construction each subcontractor shall appoint a skilled security responsible.
- The appointed security responsible shall report directly to GT Security Manager
- Security meetings will be held at regular intervals. The following items are some of the issues; security requirements, isolation of area, delivery and storage materials, emergency procedures, safety precautions etc.
- The 24 X 7 security shall be provided for all project site.
- The Security Manager in consultation with the Site HSE Manager, will review the security requirements and threats on a periodic basis and decide on the number of security guards required to adequately address all areas of concern.
- Guards will be properly trained and equipped as per their envisaged roles and responsibilities.
- Guards will function in three shifts and shall cover all areas defined as risky.
- Guards will be trained in conflict resolution and cultural sensitivity.

**5.2 Access to Site and Permission**

- GT shall designate an entrance to the site which will be used for equipment, materials and construction worker access.
- A security control point at the site entrance will be in place accompanied by an approved security personnel.

**SECURITY MANAGEMENT PLAN-rev01**

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- All workforce, staff entering the project area, must be in the possession of a valid Security ID card, obtained from GT.
- All visitors coming to the office areas must be in possession of the Gate Pass issued by the site gate security. They shall be escorted by the respective GT or sub contractor personnel.
- The following documents are required for issue of Security ID card by the GT (Except for visitors):
  - Completed and signed health report.
  - Attendance certificate GT HSE Induction.
- Workforces entering the construction site will be access controlled by passing through the turnstiles.
- Every entry into the camp by workers shall be through the turnstiles.
- Staff staying in the camp and travelling by vehicles other than buses will be access controlled at site gates, where their security badges will be checked
- Photography is not permitted, unless a permit has been obtained from GT, indicating the name of the holder and the serial number of the camera.

**5.3 Electronic Entrance Control of Personnel**

- Electronic card readers (turn styles) will be installed by GT at the entrance of site.
- Security ID cards are necessary for the entrance data to the site.
- Security ID card readers (turn styles) installed at the entrance to the camp site shall be used by all workers for access in/out of the camp.
- To enable a smooth flow of workers through the Security ID card readers (Turn styles), especially during lunch breaks, security guards will be present to observe and react in case of emergency.
- Handheld card readers available at select locations shall be used by security personnel for swiping IN and OUT data of staff.
- Leaving the fenced areas is allowed only after using the ID card.
- The security ID card readers will be connected to an access control system, which will be operated by the security contractor.
- Electronic entrance control data can be used for taking a head count in case of an emergency.

**5.4 Description of Legislated Perimeter Fence/Security Barrier**

- A security barrier constructed of metal fence (or alternative) shall surround the construction site and any corridor leading to the construction site. Fencing around the construction site and the corridor is intended to:

**SECURITY MANAGEMENT PLAN-rev01**

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- Deter access by unauthorized persons into the construction and camp site.
- Prevent the passing of weapons, explosives or incendiary devices into the construction and camp site.
- Protect the assets of the GT until construction is complete.
- The overall height of the fence is a minimum of 2 meters.
- Construction materials and equipment must remain a minimum 2 meter from the inside of the fence and 4 meters from the outside. Staging/storage areas must adhere to this requirement and snow must not be piled or allowed to accumulate against any security fence.

**5.5 Lighting**

Security lighting is an essential element of the Project's physical security system. It provides a means of extending the degree of protection during hours of darkness. It enables security forces and other Project employees to observe adverse activities and to take defensive action. Lighting is a form of passive protection and constitutes a psychological deterrent. However lighting will be kept minimum in order not disturb local ecosystem.

**5.6 Types of Lighting - Continuous Lighting**

Continuous lighting is the most common protective lighting system. It is a series of fixed lights that flood a given area and operates continually during hours of darkness. Continuous lighting can be used for:

- Glare projection lighting: Glare projection lighting is useful where the glare of lights is directed across surrounding territory and where it does not interfere with adjacent operations. It deters potential intruders because it is difficult to see inside the area. It also protects security personnel by keeping them in comparative darkness while letting them observe intruders as they approach.
- Controlled lighting: Controlled lighting is used to limit, where necessary, the width of the lighted strip outside a perimeter fence.
- Area lighting: Area lighting is used to illuminate open areas such as lay-down or storage yards and parking areas.

**5.7 Lighting Criteria**

**SECURITY MANAGEMENT PLAN-rev01**

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- Where lighting already designed provides the minimum illumination outlined in these criteria, no additional lighting is required for security. Security lighting fixtures will generally be the same as those used throughout other project sites.
  - Site Construction Office Area: Area lighting will be used for site construction office.
  - Parking Areas: All Project parking areas will be illuminated using area lighting.
  - Lay-down and Storage Areas: Area lighting for equipment storage and lay-down areas will be used.
  - Main Construction Gate: Area lighting will be used for the main construction gate.
  - Camp gate and roadways: area lighting will be used to illuminate the entrance to the camp area and all access routes within the camp area.

**5.8 Emergency Access/Exit**

- Emergency routes shall be kept clear at all times and signage must be installed to designate emergency route.
- Whenever an emergency access route to the construction site is changed the Security Manager must be advised in advance.

**5.9 Entrance Control of Vehicles at Project Site**

A vehicle identification system shall be established for all vehicles authorized access to Project sites. Vehicles authorized access shall be required to display visible identification at all times while operating within the site except for vehicles under escort by a Project security vehicle. Permanent Project vehicle identification decals shall be displayed on the inside of the windshield of the vehicle to which they are issued.

- They will be clearly visible and will be laminated so that they are difficult to alter or forge.
- Vehicle identification decals will be issued for a fixed term only, generally not exceeding one year. Identification will not be transferable from one vehicle to another.
- Temporary vehicle identification will be issued for all other vehicles requiring infrequent access to Project sites,
- Temporary identification will consist of a large sign or other conspicuous device or marking.
- Vehicles authorized temporary access shall be inspected by Project security at the facility's entrance, logged, vehicle and personnel identification checked, and temporary vehicle and Project identification issued.

**SECURITY MANAGEMENT PLAN-rev01**

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- Vehicles authorized temporary access shall be inspected upon departure
- Project Security shall maintain vehicle registers at all Project ingress/egress points where a security post exists. The register will provide a record of all vehicle movement into and out of the job site and shall include the following:
  - ✓ Vehicle license number
  - ✓ Direction of travel (in or out)
  - ✓ Date and time (of ingress/egress)

**5.10 Control on Movement of Materials**

- No person is allowed to remove from site, camp or TSF, any tool, equipment or materials, unless he is in possession of a gate pass.
- The Material Gate Pass will list the items to be removed/carried and shall be signed by authorized signatory of his company or GT where applicable.
- Standard form shall be developed.

**Security Patrols at Site**

- During day and night security patrols will be executed by trained and skilled security guards.
- The purpose of this patrol is:
  - ✓ To identify (as soon as possible) acts of theft, vandalism, sabotage etc.
  - ✓ Detecting fire at an early stage (if possible).

**5.11 Uniform for Guards**

- Security guards shall be sufficiently equipped with Safety clothing and security gadgets to perform their duty like:
  - ✓ Pocket torch.
  - ✓ Handheld telephone
  - ✓ Safety shoes with steel caps and non perforating steel soles.
  - ✓ 100% Cotton overalls with long sleeves and long legs
  - ✓ Hi visibility vest
  - ✓ Safety helmet (where required)
  - ✓ whistles

**5.12 Surveillance**

Security Manager shall ensure that CCTV camera (If installed) at the guard house of the camp is always functional and security staff trained to operate them. Following will be ensured:

**SECURITY MANAGEMENT PLAN-rev01**

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- Entrance of vehicles and persons through the gate will be monitored.
- One camera shall be deployed to look into the happenings in the camp.
- Security supervisor shall rotate the cameras in the direction he wishes to monitor.
- CCTV shall remain operational 24 X 7 and the records shall be reviewed on a sampling basis at regular intervals.
- Any observation threatening the security situation shall be reported to the Security Manager.

**5.13 On Site Training**

Security guards shall be sufficiently trained with security awareness training program accordance with local law and project needs.

The security awareness program should be delivered in a way that fits the overall culture of the organization and has the most impact to personnel.

Below is an example of content included in security awareness training program;

- Company HSE philosophy
- Target Zero Accident
- Local Law Requirement
- Importance of strong ID controls
- Importance of equipment
- Impact of unauthorized personnel
- Physical Security
- Emergency Case

**6. GENERAL RULES FOR SECURITY PERSONNEL****6.1 Standard of Guard Force**

- Be professionally sound and mature to conduct security management in a multi-cultural environment.
- Be smartly turned out and always wear special clothing to enable easy identification.
- Able to appreciate and identify situations and individuals who may indulge in vandalism, theft, trespass and similar activities prejudicial to security management.

**SECURITY MANAGEMENT PLAN-rev01**

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- Able to conduct investigations in support of the security operations as directed by the Security Manager.
- Be able to provide community policing, liaison and crime prevention programmes within the site and the camp.
- Understand the issues of ethnic sensitivities, rivalries and the situations of the workers to achieve successful community relations and policing.
- Be adept in conflict resolution, early warning and incident response.
- Truthfully report all witnessed and reported violations directly to their Shift supervisor. The Shift Supervisor shall report all incidents to the Security Manager.
- They will not leave their post, unless they are instructed to do so.
- Be part of the Emergency Response Team in crisis situations.
- Be able to understand and then adapt to the JUST CULTURE Concept in their areas of interest and influence.

**6.2 Security Guard Comportment**

Security personnel shall be exemplary in their comportment. Effectiveness of security in the Project depends on all security personnel adhering to the common standards of performance – a single guard's negligence may undermine the collective security of all. The Security Manager shall apply Just Culture, when viewing the conduct of security personnel. Some offences are:

- Leaving assigned post or duty without proper relief for any reason.
- Theft or pilferage by an officer. This includes unauthorised use of equipment or facilities like telephones, internet etc.
- Accepting any bribes, fees or gifts in the line of duty.
- Consuming alcoholic beverages, while on duty.
- Conduct unbecoming of guards, including insulting or offensive behaviour, insubordination or disobedience of orders.
- Sleeping on duty.
- Making false reports or knowingly omitting information in a report.
- Willfully or carelessly violations of Company security rules or directives.

**6.3 Project Security Rules (Prohibitions)**

- Possessing weapons, explosives or incendiary devices on company premises without written authorization.
- Drinking, using or possessing any alcoholic beverage or non- prescription narcotic drug on company premises or on company time.



**SECURITY MANAGEMENT PLAN-rev01**

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- Refusing to show badge at the request of any member of supervision or security guards.
- Permitting another to use your badge, or using another's badge.
- Removing from the job site, without proper authorization, any company property or property of any employee.
- Willfully or negligently misusing, destroying or damaging owner or company property or property of any employee.
- Fighting on company premises.
- Smoking in "No Smoking" areas.
- Engaging in vandalism.
- Refusing to comply with inspection requirements for vehicles and hand carried containers and packages.
- Exceeding the speed limit or driving or parking improperly on job site premises.
- Entering restricted or locked areas without specific permission.
- Interfering or failing to cooperate with security personnel in the performance of their duties

**6.4 Discipline Process**

The following process shall be applied to:

1 <sup>st</sup> violation	Formal oral warning (warning will be registered by Security Manager).
2 <sup>nd</sup> violation (or 1 <sup>st</sup> in case of severe violation)	Formal written warning  (Employee will receive letter with description of
3 <sup>rd</sup> violation	Dismissal  (Employee will be dismissed; a written letter will

## 7. PRIVATE SECURITY GUARD / COMPANY TRAINING

The Private Security Companies should obey the rules of the following where applicable,

- Turkish Law about Private Security (Law No. 5188)
- Info on 'Training for Security Services',
- Private Security Standards (TS 12782- Turkish Standards- Security Services – General Rules
- Private Security Standards (TS 156202- Turkish Standards - TS EN 15602 - Security service providers - Terminology )
- Training Standards described by Law No.5188, Article 14 (Training)

### **Private Security Guard Trainings:**

Turkish Law No.5188- Article 14 have provisions for training for unarmed and armed security guards which last 120 hours.

Refresher training is also mandated every 5 years and consists of a further 60 hours. The provide security company must provide required training as per the Law No.5188- Article 14 and applicable Turkish Standards.

*Article 14 of Private Security Law – The basic private security training will be arranged as not to be less than 120 training hours and will include theoretical, practical and arms training and renewal training will be arranged as not to be less than 60 training hours. For those who have graduated from such departments in the universities with security departments (faculty or vocational college) or which may open security departments (faculty or vocational college), no basic private security training will be sought other than arms training, for a period of five years. Private security training may be provided for a charge both by Ministry of Internal Affairs and by private training organizations with the permission of the Ministry. For the founders and directors of the organizations that will provide private security training, the qualifications described in the third paragraph of the Article 5 will be sought.*

*The character, syllabus, the qualifications to be sought in the trainers and training centres and also the principles and the procedures regarding the determination of the competence that will result from the training will be regulated with the laws.*

## SECURITY MANAGEMENT PLAN-rev01

## 8. SECURITY RISK ASSESMENT

ITEM	ACTIVITY	HAZARD	RISK LEVEL	CONTROL MEASURES – RISK MANAGEMENT	CONTROLLED RISK RATING	RESPONSIBILITY
	(Identify applicable hazards associated with the project)	(Identify associated risks to organisation)	(H, M & L)	(Identify key control measures)		
	Construction – General material movement, Storage	Security at storage facilities – 24 hour safeguards (Generators, Material etc.)	HIGH	Provide security guards at all facilities	LOW	Ditto
		Damage to equipment Potential injury Harm to environment.				
		Potential crush or struck by injuries Damage to facilities and environment.		Trained personnel for emergency. Job-site emergency response plan Provide and implement good fire emergency procedures and plans Train personnel in fire fighting, have proper equipment on full stand by for emergency Drills Training (HSE Management)		
	Construction Facilities – Camp	Improper location – No support from local infrastructure	HIGH	Provide survey of area resources, plans to avoid contamination	LOW	Ditto

## SECURITY MANAGEMENT PLAN-rev01

		Contamination or local resources		Plan access into and out of camp locations avoiding public Provide Security plans and implement program		
		Security Lack of R&R cycles		Source certified training personnel and programs		
		Lack of certified training personnel				
	Security – Demonstrations	Loss of production Loss of life Personal injury Damage to reputation Compensation payments Property damage.	MEDIUM	Clear Security arrangements Good public relations (local authority, Police, Fire and Medical, inhabitants).	LOW	Ditto
	Security – Theft	Tools, equipment and materials, especially those that can support remote living lifestyles i.e., generators, small portable appliances, fuel and or valuable items.	HIGH	Security procedures General awareness and training	LOW	Ditto
	Security – Kidnapping	Personal safety Potential loss of life	MEDIUM	General Security and safety awareness, training to identify arrangements Procedures to follow in an	LOW	Ditto

SECURITY MANAGEMENT PLAN-rev01

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		Loss of valuables		emergency situation		
	<u>Vehicle Security</u>	Stolen / vandalised vehicle Safety of Drivers	LOW	Determine safe areas for vehicles	LOW	Ditto

## **9. APPENDIX A- LAW ABOUT PRIVATE SECURITY SERVICES**

**LAW ABOUT PRIVATE SECURITY SERVICES****Law No. 5188****Date of Enactment 10.6.2004****PART I****General Provisions****Goal**

**ARTICLE 1.** – The goal of the present law is to define the principles and procedures regarding the private security services which complement public security.

**Scope**

**ARTICLE 2.** – The present law includes subjects regarding the permission to be given for private security services, and licensing and supervision of those persons and organizations that fulfill such services.

**Permission regarding private security services**

**ARTICLE 3.** – Protection of the individuals by armed personnel, establishment of the private security units within institutions and organizations or hiring of companies for provision of security services are all subject to the permission given by the Governor. For meetings, concerts, stage performances and similar activities and the temporary or emergency situations such as transportation of money or valuable properties, the Governor may grant permission for private security without the decision of the commission.

Upon requests of the individuals and organizations, and considering the protection and security requirements, permission will be given for the security services to be performed by staff that will be recruited and for establishing the private security units within institutions and organizations or hiring of companies for provision of security services. Establishment of a private security unit does not preclude hiring of a security company when needed within an organization

The commission is authorized to determine the staff that will perform the protection and security services, the quality and maximum amount of the arms and equipment to be held or carried and other security measures both physical and instrumental, in the necessary situations. The international liabilities regarding the security measures in such places as airports and seaports are reserved.

Private security schemes for other than the temporary situations may be ended with the decision of the commission and the consent of the Governor provided that application is made no later than one month prior.

**Private security commission**

**ARTICLE 4.** – Private security commission comprises, under the chairmanship of the Assistant Governor assigned by the Governor, of the representatives of Local Security Department, local gendarmerie headquarters, chamber of commerce and chamber of industry for taking the decisions regarding private security referred to in this Law, .. As far as the provinces where no chamber of industry exists are concerned, the representative



of the chamber of commerce and industry will participate in the commission. In order to give private security permissions or to cancel such actions, the person or the representative of the applicant organization will participate in the commission meeting as a member. The commission adopts the decisions by majority of votes; in case of equal number of votes, the group that includes the chairman will be deemed as the majority; no absentia voting is allowed.

#### **Private security companies**

**ARTICLE 5.** – Engagement in activities, of companies in the field of security is subject to the permission given by Ministry of Internal Affairs. In order the operating permission to be given, the company shares must be registered and the scope of activities must be exclusively protection and security services. The private security companies will notify their branch offices to the Ministry and the relevant Governorship in writing and their share transfers to The Ministry in one month.

The foreigners' founding private security companies and foreign companies' providing private security services in Turkey are subject to the reciprocity principle.

The conditions described in (a) and (d) clauses of the Article 10 of the present Law are sought in the founders and directors of the private security companies. It is also compulsory for the directors to have graduated from a 4-year university, to meet the condition described in (d) clause of the Article 10 of the present Law and to have successfully completed the private security basic training that is described in the Article 14 of the present Law.

In the case that the qualifications sought in the founders and the directors are lost, the operating permission will be abolished unless the deficiencies are corrected or these founders and the directors are replaced within two months..

The protection and security services that these companies will provide for third persons, institutions and organizations are notified to the relevant Governorship no later than one week before the service starts. No time requirements sought in the emergency and temporary protection and security services,.

#### **Additional measures**

**ARTICLE 6.** – Civilian administration authorities are authorized to supervise the private security measures taken in the airports, seaports, customs, stations and railway stations and such places in which sports contests, stage performances and similar activities are performed and to take extra measures as public security necessitates.

In terms of establishing the public security, the authorities that are given to the Governors and District Administrators with the Provincial Administration Law with the number 5442 are reserved. In the case that such authorities are performed, the private security unit and private security staff have to obey the commands of the Civilian administration authorities and the general police chief.

## **PART II**

### **Private Security Guards**

#### **The authorities of the Private security guards**

**ARTICLE 7.** - The authorities of the Private security guards are as follows:





a) Letting the persons who are to enter the areas where private security guards establish protection and security, pass through sensitive doors, checking such people with detectors, checking the goods through X-ray devices or any other security systems.

b) Checking the identity cards, letting the persons in through the sensitive doors, checking people with detectors, checking the belongings through X-ray devices or any other security systems in meetings, concerts, sports contests, stage performances and in funerals and wedding ceremonies.

c) Arresting and commensurate checking due to arresting in accordance with the article 127 of the Code of Criminal Procedure with the number 1412.

d) Arresting and searching those people for whom arrest, custody or conviction warrants exist in their field of mission.

e) Entering the offices and houses in their field of mission in case of natural disasters such as fire, earthquake and help is requested.

f) Checking the identity cards, letting the persons in through the sensitive doors, checking people with detectors, checking belongings through X-ray devices or any other security systems in public transport facilities such as airports, seaports, stations, railway stations and terminals.

g) Subject to notifying the police forces immediately, taking in custody any goods which are related to any crimes, or may be evidence or may lead to danger though not related to any crime.

h) Holding in safe custody any left or found goods.

i) Catching individuals with the aim of protecting them from any danger in terms of their bodies or health.

j) Protecting the crime scene and the evidences, making arrests with this aim in accordance with the Article 157 of Code of Criminal Procedure.

k) Using force in accordance with the Article 981 of Turkish Civil Code, Article 52 of The Law of Obligations, clauses (1) and (2) of the paragraph I of the Article 49 of Turkish Criminal Code.

#### **The authority to hold and carry weapons**

**ARTICLE 8.** – Numbers and qualities of the firearms may be kept by which security guards and for what security services will be determined by the commission.

However, no armed private security guards are allowed to work in schools, health facilities, gaming facilities and in places where alcoholic beverages are served. Private security guards may not carry their guns in private meetings, sports contests, stage performances and in similar activities.

The arms and equipments to be used for the protection and security services will be provided by the related person or organization. Private security companies are not allowed to buy or hold firearms. However, permission to buy, use and carry guns can be given by the decision of the commission and the approval of the Governor to the private security companies to be used in transfer of money or valuable goods and temporary protection and security services and to the institutions that provide private security training, to be used in training.



#### **Sphere of duties**

**ARTICLE 9.** – These guards are allowed to use the authorities that were described in the Article 7 within their mission period and their mission field only.

Private security guards are not allowed to take their guns out of their mission field. In the situations that include a route such as following of an accused person of a committed crime or a strongly suspected person, taking measures against the attacks made from outside, transferring of money or valuable goods, protecting individuals and funeral ceremonies, the route will be included in the mission field. In compelling situations, the mission field may be extended by the decision of the Commission.

The incidents that necessitate the authorization to use force and arrest will be notified to the police forces in the quickest way possible and the person arrested and the goods brought under control will be delivered to the police forces.

#### **The conditions to be sought in private security guards**

**ARTICLE 10.** – The following conditions are sought in private security guards:

- a) Being a Turkish citizen.
- b) Having graduated from high school or any other equivalent school.
- c) Being 18 years old or older.
- d) Excluding the negligent offences, not having been sentenced to heavy imprisonment or imprisonment for more than six months, or notwithstanding having been given amnesty, not having been sentenced for the crimes committed against the State, misappropriation, official corruption, bribery, theft, swindling, abuse of confidence, forgery, fraudulent bankruptcy or smuggling other than usage or consumption smuggling, corrupting the official bids and purchases, betraying the secrets of the government, making an improper innuendo to a woman, sexual harassment, molestation, rape, kidnapping and detaining a girl, woman or child, solicitation, acting as an intermediary for prostitution, drug abuse, drug smuggling.
- e) Not having been barred from public services.
- f) Not having any physical or mental illness that would prevent him/her to fulfill his/her duty and not being handicapped.
- g) Having successfully completed the private security basic training course as described in Article 14.

#### **Working license**

**ARTICLE 11.** – Security investigation will be conducted by the Governor's Office for those who will be recruited as private security guards and those who will work as directors in the private security companies and private security training companies. Working license will be issued for a period of five years by the Governor's Office to those with positive results from the investigation on the condition that they successfully complete the private security basic training course described in Article 14 of the present Law. For those private security guards who will not carry firearms, only record investigation is made. Security investigation and record investigation will be completed within one month.



The private security guards take up duty are notified to the Governor's Office by the employer within one month.

For renewal of the working licenses, the security investigation must be positive and the private security renewal training course that is described in the Article 14 of the present Law must be successfully completed. In case that the qualifications sought in the private security guards are lost, the working license will be abolished. For those who have retired from the police or gendarmerie forces and for those who have resigned in their own will after working in the police or gendarmerie forces for no less than five years, no condition of private security basic training will be sought for a period of five years following their retirement or resignation.

#### **Identity Card**

**ARTICLE 12.** – Identity cards will be issued to the private security guards by the Governor's Office. The identity card will quote the name and surname of the guard and whether (s)he carries weapons.

Identity cards will be worn on front in such a way that will be visible to everyone in the mission field and mission period. Those private security guards who do not wear their identity cards cannot exercise their authorities that are described in the Article 7 of the present Law.

Those private security guards who have resigned from their duties for any reason will be notified to the Governor's Office within fifteen days.

#### **Dressing**

**ARTICLE 13.** – The private security guards wear uniforms at their mission fields and within their mission period. The commission may give permission to wear civilian clothes during their performance of their work when needed due to the requirements of the duty and office.

#### **Training**

**ARTICLE 14.** – The basic private security training will be arranged as not to be less than 120 training hours and will include theoretical, practical and arms training and renewal training will be arranged as not to be less than 60 training hours. For those who have graduated from such departments in the universities with security departments (faculty or vocational college) or which may open security departments (faculty or vocational college), no basic private security training will be sought other than arms training, for a period of five years.

Private security training may be provided for a charge both by Ministry of Internal Affairs and by private training organizations with the permission of the Ministry. For the founders and directors of the organizations that will provide private security training, the qualifications described in the third paragraph of the Article 5 will be sought.

The character, syllabus, the qualifications to be sought in the trainers and training centers and also the principles and the procedures regarding the determination of the competence that will result from the training will be regulated with the laws.

#### **Indemnity**

**ARTICLE 15.** – To those private security guards who have been injured, have become physically disabled or to the legitimate heirs of the private security guards who



have died during the performance of the duties set out in the present Law, indemnity will be paid within the amount limits and principles determined in the contract of employment or in the collective bargaining agreement. However, where court rules for payment of a higher amount of indemnity than that is set forth in the general provisions, the amount paid in accordance with the contract of employment or in the collective work agreement will be set off.

The indemnity to be paid in accordance with the provisions of the first paragraph cannot be connected with the other indemnities to be paid within the scope of The Labour Law no 4857.

The higher of the amount of indemnity written in the contract of employment or in the Collective Bargaining agreement or the Law on Cash Indemnities and Allowances no 2330 will be paid to those private security guards who are injured or have become physically disabled or to the legitimate heirs of the private security guards who have died during the performance of the duties written in the Present Law..

### **PART III**

#### **Prohibitions and Penalties**

##### **The ban on employing Individuals in non duty situations**

**ARTICLE 16.** – The private security staff cannot be employed in services other than those protection and security services described in the Law.

##### **Strike Ban**

**ARTICLE 17.** – The private security staff cannot participate in strikes.

##### **Ban on Removal from Duty**

**ARTICLE 18.** – The private security guards cannot be removed from office due to lockouts.

##### **The judicial crimes and penalties**

**ARTICLE 19.** – The judicial crimes and penalties that are prescribed in the present Law are as follows:

a) Those persons or the directors of the organizations that employ private security guards without getting private security permission written in the Article 3 of the present Law will be sentenced to imprisonment for no more than a period of six months and a heavy fine of TL six billion.

b) Those persons or the directors of the organizations that perform private security services without getting operating permission written in the Article 5 of the present Law, those persons or the directors of the organizations that employ private security guards without getting private security permission written in the Article 3 of the present Law, those directors of the organizations and institutions that provide private security training without getting private security permission written in the Article 14 of the present Law will be sentenced to imprisonment for no more than a period of one year and a heavy fine of TL twenty billion. Those persons who have been so sentenced may cannot be founders or directors in the private security companies or in the private security training centers.





c) Those persons, organizations and institutions that employ the persons to whom no working license is given in accordance with Article 11 of the present Law as private security guards will be sentenced to heavy fines of TL three billion for each person employed. In the case that these persons are employed carrying arms, they will be sentenced to imprisonment for no more than a period of six months and a heavy fine of TL three billion for each person employed.

d) Those persons, organizations and institutions that employ private security guards without providing insurance of liability described in the Article 21 of the present Law will be sentenced with a heavy fine of TL three billion for each person employed.

e) Those persons and directors of the organizations and institutions that make announcements or advertisements regarding the private security services or private security training without getting the operating permission written in the present Law are sentenced to imprisonment for no more than a period of six months and with a heavy fine of TL ten billion.

#### **Administrative crimes and penalties**

**ARTICLE 20.** – The Administrative crimes and penalties that are prescribed in the present Law are as follows:

a) Those private security companies that have not notified to the related Governor's Office the private security services to be provided to the other persons, organizations and institutions within the time period mentioned in the Article 5 will be sentenced with a heavy fine of TL one billion for each notification.

b) Those persons and the directors of the organizations and institutions that do not take extra measures demanded by the civilian administration authorities in accordance with Article 6 will be sentenced with an administrative fine of two billion TL.

c) Those private security guards who do not obey the strike ban written in Article 17, who use their firearms in violation of the present Law or outside the mission field or who let their private security identity cards to be used by somebody else will be sentenced with an administrative fine of TL one billion, and the working licenses of such persons will be abolished. Such persons can no more serve as private security guards.

d) Those persons and the directors of the organizations, institutions and companies who do not remedy the deficiencies determined and asked to be remedied in accordance with Article 22 are sentenced to an administrative fine of two billion TL.

e) Those persons and the organizations and institutions that employ the private security guards in the services any other than protection and security services will be sentenced to an administrative fine of TL one billion. for each act.

f) Those who have not fulfilled in time the notifications described in the paragraph 2 of Article 11 and in paragraph 3 of the Article 12 will be sentenced with an administrative fine of TL one billion.

The administrative fines prescribed in the present Article will be imposed by the highest civilian authority of the district in question. The decisions regarding the fines will be announced to the relevant parties in accordance with the provisions of Act Relating the Official Communications number 7201. Objections against such fines can be filed with the competent administrative court no later than seven days from the date of the



announcement. Objections will not prevent the imposition of the fine given. Objection will be brought to a conclusion within the least possible time period through investigation of the document. Decisions given regarding the objection, can be appealed before the provincial administrative court. The decisions made by provincial administrative courts are final. The administrative fines given in accordance with the present Law will be collected by Ministry of Finance upon the notification of the relevant Governor's Office or District Governor's Office in accordance with the The Law on Collection of State Receivables number 6183.

#### **PART IV**

##### **Miscellaneous Provisions**

###### **Private security liability insurance**

**ARTICLE 21.** – Corporate bodies and private security companies, with the aim of indemnification of the damages that the private security guards they employ may inflict upon third parties have to provide private security liability insurance. The principles and procedures related to the private security liability insurance are determined by Turkish treasury.

The private security liability insurance prescribed in the present Article are provided by the insurance companies that are authorized to operate in the related branch in Turkey. Such insurance companies are entitled to provide the private security liability insurance. The insurance companies that do not obey this obligation will be subject to an administrative fine of TL eight billion by the Turkish treasury. Provisions of the paragraph two of Article 20 applies to the collection of this fine and the procedures for the objections to the fine,

###### **Supervision**

**ARTICLE 22.** – The Ministry of Internal Affairs and Governors' Offices are authorized supervise the private security units, private security companies and private security training centers. The nature, scope, procedure and principles of the supervision will be determined with the laws.

It is compulsory for the relevant persons, organizations, institutions and companies to remedy the deficiencies identified as a consequence of supervision within the given time period.

The operating permission of those companies or private training organizations which operate outside their goals or which are identified to have been a source of crime will be abolished. The founders and directors of the companies and organizations whose operating permission are abolished in this regard cannot be founders or directors in the private security companies or in private security training organizations.

**Enforcement of fines**

**ARTICLE 23.** – The private security guards will be deemed to be civil servants in the enforcement of Turkish criminal code.

Those who commit crimes against the private security guards while on duty will be sentenced in the same way as if they have committed a crime against civil servants.

**License fee**

**ARTICLE 24.** – TL Ten billion for the operating permission to be given to the private security companies and the private security training organizations and TL two hundred million for the working license to be given to the private security guards will be collected and these fees will be deposited in the revenue authorities.

**The application of Revaluation rate**

**ARTICLE 25.** – The heavy fines described in the Article 19, the administrative fines described in the Article 20, the administrative fine described in the Article 21, the amounts regarding the license fees described in the Article 24 of the present Law will be increased each year in accordance with the revaluation rates determined in accordance with the Tax Procedure Law number 213.

**Regulations**

**ARTICLE 26.** – The Regulations regarding the implementation of the present Law will be published by the Ministry of Internal Affairs within three months following the publication of the present Law.

**Abolished Law**

**ARTICLE 27.** – The Law on Protecting Certain Organizations and Institutions and Provision of their Security dated 22.7.1981 number 2495 is abolished.

**TEMPORARY ARTICLE 1.** – On the date that the present Law enters into force, it will be assumed that the private security permission is given to the private security organizations founded in accordance with the Law number 2495 and work permits will be deemed issued to security guards for a period of five years.

**Effectiveness**

**ARTICLE 28.** – The Articles 19 and 20 of the present Law will go into effect nine months after the publication of the Law and other articles will become effective on the date of publication of the Law.

**Enforcement**

**ARTICLE 29.** – The Council of Ministers will enforce the provisions of the present Law.

## 10. APPENDIX B- TURKISH PRIVATE SECURITY COMPANIES STANDARTS

Private security companies uses two kind of security service standards of TSE (Turkish Standards Institution). These are;

- TS 12782 – Security services – General rules and
- TS EN 15602 – Security service providers – Terminology.

### 1- TS 12782 – Security services – General rules



2.Baskı

ICS 03.080.30

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GÜVENLİK HİZMETLERİ - GENEL KURALLAR

Security services - General rules

Turkish Standard - TS 12782 - Security services - General rules

TS No : TS 12782

Acceptance Date : 13.April.2010

Document Type : ST

Title : Security services – General rules

Type : Service, Job ...

Description : This standard includes the authorization and auditing of security guards' and companies' in addition their rules of management, physical structure, personnel, required instruments, equipment and the protection for people by armed/unarmed private security guards.

Resource : Case number 5188

ICS code : 03.080.30

Cen/Cenelec : -

Language : Turkish (tr)

### 2- TS EN 15602 – Security service providers – Terminology





1.Baskı

ICS 01.040.03; 01.040.13; 03.080.20; 13.310

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## ÖZEL GÜVENLİK HİZMETİ SAĞLAYICILARI - TERKİNOLOJİ

### Security service providers - Terminology

Turkish Standards - TS EN 15602 - Security service providers - Terminology

TS No : TS EN 15602

Acceptance Date : 21.02.2013

Document Type : ST

Title : Security service providers – Terminology

Type: Service, Jobs, ect.

Description : This standard includes security service providers – terminology

Resource : EN 15602:2008

International equivalent : EN 15602-EQV

Translated STD : EN 15602

ICS codes : 01.040.03, 01.040.13, 03.080.20, 13.310

Cen/Cenelec : CEN

Language: Turkish (tr)