



Swimming Pool and Spa Industry CHEMICAL SECURITY VOLUNTARY CODE OF PRACTICE

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ACKNOWLEDGEMENT:

The Swimming Pool and Spa Association of Australia (SPASA) would like to acknowledge the National Code of Practice for Chemicals of Security Concern available at www.chemicalsecurity.gov.au. The chemical security logos used in the code have been reproduced with permission from the Australian Government Attorney-General's Department, the lead Australian Government agency under the intergovernmental [Agreement on Australia's National Arrangements for the Management of Security Risks Associated with Chemicals](#).

Notice: This document does not attempt to provide an inclusive list of security measures. Further, the guidance in this document is not intended as a substitute for requirements under applicable Federal, state or local security related legislation. Members should contact SPASA if further information is required.

Alternatively, members can refer to Appendix F of this document to access additional resources.

Objectives of the Code of Practice

The Swimming Pool and Spa Industry consists of a diverse range of sectors which includes (*but is not limited to*): Manufacturers, Suppliers, Importers, Retailers, Pool Builder's sub-contractors and consultants, Service Technicians and pool and spa owners. Almost every sector deals with chemicals in their business or organisation at some point in time as part of their overall sales or services.

Whilst a large and diverse number of swimming pool chemicals are legitimately used by individuals and organisations in Australia, there are also a small percentage of chemicals that have been or could potentially be diverted for unlawful purposes, including terrorist related activity. The Council of Australian Governments (COAG) has identified 96 chemicals of security concern, including 11 chemical precursors to homemade explosives and 4 toxic chemicals – refer to Appendix A.

This Industry specific Voluntary Code of Practice (Code) looks at how to manage the risks associated with preventing chemicals in your control from falling into the wrong hands.

The Codes objectives are to promote effective chemical security management practices throughout the chemical supply and use chain, and in particular to:

- Protect against the diversion of chemicals for terrorist or criminal purposes.
- Encourage cooperation between businesses and organisations that handle chemicals and law enforcement agencies on chemical security matters.
- Educate and train staff to be alert to warning signs and report suspicious behaviours.

To achieve these objectives, the Code provides guidance and information on a range of practical security measures that businesses and individuals in the swimming pool and spa industry may consider.



Your circumstances and treating the security risk

Security risk management is an essential part of good business practice.

Management, employees and contractors in the Swimming Pool and Spa Industry have a role to play in safeguarding the industry and all Australians.

SPASA Members and the broader industry need to understand and ensure they maintain a constant alert when storing, selling and transporting chemicals.

Chemical Security Risks will be specific to your business and may include a combination of measures.

You should consider:

- Identifying the security gaps – find out where chemicals could be lost or diverted from your business and ultimately find their way into the wrong hands
- Reducing the risks – apply processes relevant to your business to protect against loss and diversion of chemicals.

Assign responsibility

Assign responsibility for Chemical Security Management to an employee within your business to:

- Introduce and maintain security measures based on threat and risk
- Develop and manage reporting systems
- Promote your businesses security policy and procedures
- Include security in employee and contractor training and induction
- Ensure suspicious incidents and security breaches are investigated and reported
- Develop and maintain a company policy on employee and contractor checking

Good Business Management

(Chemical Security Management) - *continued*

Investigate and Report Suspicious Behaviour

All suspicious incidents and security breaches should be investigated and reported to the **National Security Hotline on 1800 123 400**.

Suspicious incidents could relate to people that are external (e.g. customers, general public) or internal (e.g. employees, contractors) to your business. Examples include:

- Attempts to purchase chemicals for no clear purpose, with cash, or with identification that appears fraudulent
- Chemical orders which seem excessive for their intended use
- Doors that are tampered with, holes in fences, signs of illegal entry
- Unauthorised entry into restricted areas
- Unexplained signs of vehicle(s) activity in restricted areas
- Unexplained requests for technical information about your pool shop, manufacturing facility or transport practices
- Unexplained losses of chemicals in your possession

Click on this link: [Chemical Security Awareness Training Program - Video](#) or the below you tube video image to see some examples of what may be considered suspicious behaviour.



OR type in the following:

<http://www.chemicalsecurity.gov.au/resources>

in your browser's address bar to get access to fact sheets, brochures, training and videos.

The code is voluntary and applies to 15 specific chemicals, the first of 96 chemicals of security concern to undergo the risk assessment process. Businesses are encouraged to adopt the code for any of the 96 chemicals they handle.

If you manufacture, store, transport or sell – including online sales – any of the 15 chemicals listed in Appendix A that are highlighted in red or green, then the code applies to you.

Some swimming pool and spa businesses may also handle, manage or store several of the 96 chemicals listed in Appendix A – these businesses are also encouraged to adopt the code in relation to any of those chemicals.

You can assist in reducing the vulnerabilities to your business – and the wider Australian community – by taking time to review your preparedness to deal with theft or diversion of chemicals and by putting simple security measures in place.

Good security planning can enhance your business and contribute to a stronger and more resilient Australia.

If you have determined that your business deals with one or more of the chemicals identified in Appendix A, you can then apply the practical tests and security measures detailed in this code. You should think about the chemical security risks in your workplace and what you are going to do to address those risks.

Risk Assessment & Security Measures

Commonly available products containing chemicals can be stolen, diverted or purchased from retailers and can be used to make improvised explosive devices for terrorist acts.

By assessing your business's risk and implementing security measures to reduce that risk, you can prevent your chemicals from falling into the wrong hands.

Self-assess your security risks, and then choose the most appropriate measures to reduce the risks of terrorists acquiring chemicals from your business.

The following table sets out a series of suggested actions which can be adopted by businesses based on their particular set of circumstances.

Measure	Suggested actions
Employment and contractor screening	<p>Limit access to chemicals of security concern to valid and trusted employees and contractors.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Basic background checking prior to and during employment <input type="checkbox"/> Educate staff on security issues and controls <input type="checkbox"/> Verify identify and referee information and follow up on anomalies <input type="checkbox"/> Check criminal history where there is a risk related to the requirements of the position
Personnel security awareness	<p>Ensure personnel are aware of the risks associated with the theft or loss of unaccounted chemicals of security concern.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Educate staff on potential misuse of chemicals being handled in induction and ongoing training and provide clear instructions for reporting suspicious activity
Inventory control measures	<p>Determine whether chemicals of security concern have been stolen, misplaced or otherwise diverted.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Set up an inventory control system that: <ul style="list-style-type: none"> <input type="checkbox"/> Identifies chemicals of security concern <input type="checkbox"/> Shows the location of such chemicals <input type="checkbox"/> Be able to track chemicals being received, removed or in stock
Physical access	<p>Restrict physical access to chemicals of security concern to reduce the likelihood of them being stolen or otherwise diverted.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Install deterrent signage <input type="checkbox"/> Install security fencing or walls <input type="checkbox"/> Install additional lighting <input type="checkbox"/> Install controlled access gates <input type="checkbox"/> Require visitors to sign in <input type="checkbox"/> Use employee and visitor photo ID badges

Measure	Suggested actions
Personnel access	Limit access to chemicals of security concern to persons who have a legitimate need to access them and reduce the likelihood of them being stolen or otherwise diverted. <ul style="list-style-type: none"> <input type="checkbox"/> Restrict access to authorised personnel <input type="checkbox"/> Always escort or monitor visitors and contractors
Point of sale procedures	Adopt practices that limit opportunities for the acquisition of chemicals for terrorist or criminal use through direct purchase from the business. <ul style="list-style-type: none"> <input type="checkbox"/> Only sell to customers with known identity and verified legitimate use <input type="checkbox"/> Ensure that all transactions are traceable. Examples include: credit card, cheque or bank transfers (<i>cash only to known customers</i>) <input type="checkbox"/> Report suspicious transactions.
Transporting chemicals of security concern procedures	Have effective physical security and inventory control processes to reduce the likelihood of chemicals of security concern being accidentally or deliberately delivered to or stolen during transport. <ul style="list-style-type: none"> <input type="checkbox"/> Ensure chemicals are secure at all times during transport <input type="checkbox"/> Do not leave vehicles unattended <input type="checkbox"/> Record quantities of chemical during loading and unloading <input type="checkbox"/> Implement a system to confirm deliveries of correct amounts with security intact <input type="checkbox"/> Ensure chemicals are only supplied to the correct recipient

REMEMBER



Knowing Your Customer involves being able to identify whether a customer’s purchase of a chemical product is legitimate. Your business is best placed to prevent, detect and deter suspicious purchases of chemicals. This can be achieved by knowing your customers and reporting anything that seems unusual.



If something doesn’t feel right – Report it. Trust your intuition. If it does not feel right, you should call the National Security Hotline and report your concerns. The information you pass on may be the critical piece needed to complete a bigger picture.

National Security Hotline
1800 123 400

Appendix A 96 Chemicals of security concern

<p>A Aldicarb Aluminium phosphide Ammonia (anhydrous) Ammonium nitrate* Ammonium perchlorate Arsenic pentoxide Arsenic trioxide Arsine Azinphos methyl</p> <p>B Bendiocarb Beryllium sulfate Bromine</p> <p>C Cadusafos Calcium cyanide Carbofuran Carbon disulphide Carbon monoxide Chloropicrin Chlorfenvinphos Chlorine Cyanogen bromide Cyanogen chloride</p>	<p>D Diazinon Dichlorvos Diethyl phosphite Dimethyl phosphite Dimethyl mercury Dimethyl sulfate Disulfoton</p> <p>E Endosulfan Ethion Ethyl mercury chloride Ethyl-diethanolamine</p> <p>F Fenamiphos Fluorine gas Fluoroacetic acid Fluoroethyl alcohol Fluoroethyl fluoroacetate</p> <p>H Hydrochloric acid Hydrogen chloride Hydrogen cyanide Hydrogen peroxide Hydrogen sulfide</p>	<p>M Magnesium phosphide Mercuric chloride Mercuric nitrate Mercuric oxide Mercurous nitrate Mercury cyanide Methamidophos Methidathion Methiocarb Methomyl Methyl fluoroacetate Methyldiethanolamine Mevinphos</p> <p>N Nitric acid Nitric oxide Nitromethane</p> <p>O Omethoate Osmium tetroxide Oxamyl</p>	<p>P Paraquat Parathion methyl Perchloric acid Phorate Phosgene Phosphine Phosphorus Phosphorus oxychloride Phosphorus pentachloride Phosphorus trichloride Potassium chlorate Potassium cyanide Potassium nitrate Potassium perchlorate Propoxur</p> <p>S Sodium azide Sodium chlorate Sodium cyanide Sodium fluoroacetate Sodium perchlorate Sodium nitrate Strychnine Sulfur dichloride Sulfur monochloride Sulphuric acid</p>	<p>T Terbufos Thallium sulfate Thionyl chloride Thiophosphoryl chloride Triethanolamine Triethyl phosphite Trimethyl phosphite</p> <p>Z Zinc cyanide Zinc phosphide</p> <p>* Security-Sensitive Ammonium Nitrate (SSAN) [ammonium nitrate, ammonium nitrate emulsions and ammonium nitrate mixtures containing greater than 45 per cent ammonium nitrate, excluding solutions]</p>
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NOTE: Chemicals in **red italics** are the 11 chemical precursors to homemade explosives
Chemicals in **green italics** are the 4 toxic chemicals

Appendix B

SAMPLE COMPLIANCE CHECKLIST

The checklist below can be adapted to the needs of an individual company based on the outcomes of the risk assessment.

Question		Yes / No	Recommended Action
Business Owner / Management			
1	Has our business developed chemical security policies and procedures?		
2	Do our employee and/or contractor training cover chemical security?		
3	Has someone in our business been appointed with overall responsible for chemical security?		
4	Do we have a system for <u>investigating</u> suspicious incidents and security concerns?		
5	Do we have a system for <u>reporting</u> security incidents or suspicious behaviour?		
6	Are we aware of all relevant chemical security legislation?		
Question		Yes / No	Recommended Action
Risk Assessment			
1	Do we have a system to identify, eliminate or reduce security risks from occurring in our premises or transport vehicles?		
2	Do we know the location and quantity of all chemicals of security concern in our possession?		
3	Can we track chemicals being received, removed or in stock?		
4	Have our systems been tested for weaknesses?		

Question		Yes / No	Recommended Action
Site Security			
1	Do we have an dedicated secure area for chemicals?		
2	Have we conducted a security assessment of our premises and transport vehicles?		
3	Have we implemented appropriate control measures, such as signs, secure doors and windows, locks and control of gates and docks?		
4	Do we have appropriate perimeter protection, using, for example, fences, bollards and security lighting?		
Question		Yes / No	Recommended Action
Emergency Plans			
1	Have we developed emergency procedures for when we identify something has gone wrong?		
Question		Yes / No	Recommended Action
Supply Chain Security			
1	Do we know our customers? If not, have we verified that our customers are legitimate and their use for our product/s is legitimate?		
2	Are we familiar with the transport company that we use?		
3	Do we have a system to check all incoming deliveries?		
4	Do we have a system to validate that chemicals are delivered to the correct recipient		
5	Do we have procedures to identify and prevent the possible misuse of chemicals by employees, contractors & suspicious persons?		

Question	Yes / No	Recommended Action
IT and Information Security		
1	Do we have a secure system to protect our businesses computer records?	
2	Is access to a computer and software passwords periodically monitored and updated?	
3	Do we regularly analyse computer transaction to look for irregularities that might indicate security concerns?	
4	Do our employees follow approved procedures for protecting and/or the destruction of sensitive documents?	

Authorised by: *(Signature)*

Name: *(Print)*

Date:

Appendix C

Detecting suspicious behaviour:

A guide for Pool Shops and Service Technicians

A customer enquires about purchasing a product containing a chemical of security concern

Consider the following:

- Do you know the customer?
- Have they purchased chemicals from you before?
- Does the customer appear nervous ?
- Is the customer's behaviour suspicious?
- Are they purchasing more than is required?
- Are they paying cash?
- Anything unusual for online purchases?

CUSTOMERS MAY DISPLAY ONE OR MORE SUSPICIOUS INDICATORS

Ask the customer:

- Why do you want the product?
- Do you know how to use it?

Note: Consider whether the chemical concentration and quantity is appropriate for their stated use?

DOES THEIR STORY SUPPORT THEIR PURCHASE?

If the sale proceeds:

Make the sale by credit card, cheque, bank transfer or account

If the sale does not proceed

If something doesn't feel right, take following notes on:

- What they looked like (for identification purposes)
- What they were buying
- How much they were buying
- What made the sale suspicious
- What they touched in the store
- What vehicle they were driving
- If any identification was used
- If they paid cash, keep it aside
- For online sales, keep a copy of the order including payment method

EVERY LITTLE DETAIL HELPS

Report to the National Security Hotline on

1800 123 400

or hotline@nationalsecurity.gov.au

Appendix D

Detecting suspicious behaviour:

A guide for manufacturers and suppliers

Suspicious behaviour is anything that just does not feel right – trust your intuition



Consider the following suspicious indicators:

- Is an unknown company trying to make an order?
- Is their ordering pattern irregular or unusual in terms of timing or quantities ordered?
- Are they reluctant to supply a written order?
- Are they ordering or purchasing chemicals for which they have no obvious need?
- Are they indicating an intended use that is inconsistent with the chemicals ordered?
- Have they provided an unbelievable story about the use for the chemical?
- Are they purchasing in small containers even when industrial use is claimed?
- Are they offering to pay an excessive price for fast delivery?
- Are they unwilling to supply a telephone number or an address?
- Are they reluctant to provide ID when asked for proof of identity?
- Do they want to pay in cash for large purchases?
- Are they providing unusual delivery instructions?
- Are they requesting delivery in non-commercial or unmarked packaging?
- Are they requesting delivery to a post office box or similar?
- Is the order being collected with the purchaser's private vehicle?
- Have they parked their vehicle an unreasonably long distance away?

CUSTOMERS MAY DISPLAY ONE OR MORE SUSPICIOUS INDICATORS



If something doesn't feel right, note down as much detail as possible on

- What they looked like (for reporting purposes)
- What they were buying
- How much they were buying
- What made the sale suspicious
- What they touched while on the premises
- What vehicle they were driving
- What, if any, identification was used
- If they paid cash, keep it aside
- For online sales, keep a copy of the order including payment method
- **Other:** vehicle registration, chemical quantities, any identification used, what they said about the intended

EVERY LITTLE DETAIL COULD HELP



Report to the National Security Hotline on

1800 123 400

or hotline@nationalsecurity.gov.au

Appendix E

Detecting suspicious behaviour:

A guide for transporters delivering chemicals

Suspicious behaviour is anything that just does not feel right – trust your intuition



Consider the following suspicious indicators:

- Is the load being delivered from business to consumer instead of business to business?
- Is the load being delivered to a consumer that the transport operator does not know?
- Does the ordered amount depart from normal quantities ordered?
- Is the delivery address suspect? *For Example, is there a commercial quantity of chemical being delivered to a residential address?*
- Is anyone showing an unusual interest in routes, schedules or security arrangements?
- Is anyone showing an unusual interest in the truck while it's being loaded / unloaded?

RECIPIENTS OF GOODS MAY DISPLAY ONE OR MORE SUSPICIOUS INDICATORS



If something doesn't feel right, take notes on:

- What the recipient looked like (*for reporting purposes*)
- What the recipient was receiving?
- How much the recipient was receiving?
- What made the delivery suspicious?
- What vehicle the recipient was driving
- Any comments they made about the intended use
- If any identification was used by the recipient
- Detail of conversation with anyone displaying unusual interest

EVERY LITTLE DETAIL HELPS



Report to the National Security Hotline on

1800 123 400

or hotline@nationalecurity.gov.au

Appendix F

Sources of additional information

Chemicals of Security Concern Podcast & Transcript

Former Attorney-General Nicola Roxon, Superintendent John Stapleton of NSW Police Counter-Terrorism Command and representatives from SPASA talk about the national security risks of everyday chemicals and urge members of the community to report suspicious activity to the National Security Hotline on **1800 1234 00** to help protect Australia from terrorism.

Podcast

<http://www.chemicalsecurity.gov.au/Media1/FINAL%20chemical%20security%20podcast.MP3>

Transcript

<http://www.chemicalsecurity.gov.au/Resources/Pages/Chemicalsofsecurityconcerntranscript.aspx>

Chemical Security website: www.chemicalsecurity.gov.au

This provides information on a range of chemical security matters, including security risk assessment information to inform your own risk assessment.

National Security Website: www.nationalsecurity.gov.au

This website contains information about the National Terrorism Public Alert System, including the current public alert level.

Additional Training and risk communication materials

Additional materials, including training resources and guidance materials are available at www.chemicalsecurity.gov.au

Australian Security Intelligence Organisation (ASIO) Business Liaison Unit (BLU)

Businesses can subscribe to this secure site to access reports that cover specific industries and a wide range of other general purpose security and incident reporting relevant to key Australian industries and infrastructure. The reports are distributed to enable the private sector to better understand the security environment and the threats they face and assist them with security planning. www.blu.asio.gov.au

Fairwork Ombudsman

The Australian Government Fairwork Ombudsman has released guidance on workplace privacy for business owners.

<http://www.fairwork.gov.au/resources/best-practice-guides/Pages/workplace-privacy.aspx>

POLICE (CRIMINAL HISTORY) RECORDS CHECK:

State Police:

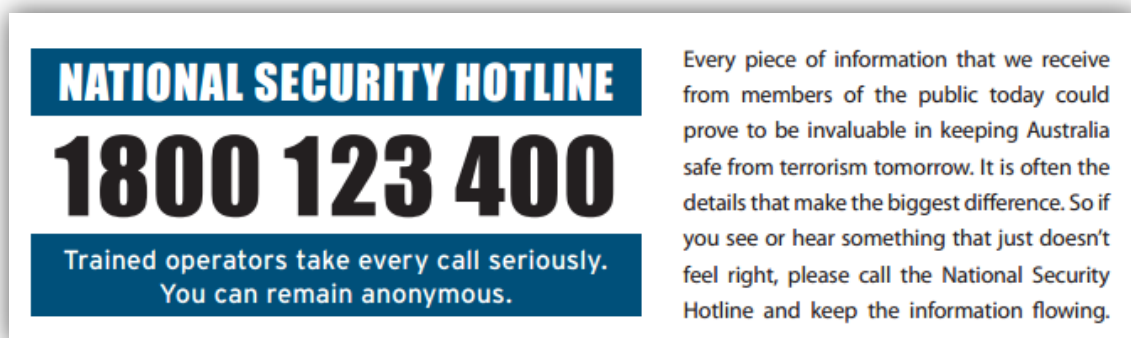
- New South Wales - [National criminal history record check](#)
- Northern Territory - [get a criminal history check](#)
- Queensland - [Police certificate \(Australia-wide criminal history\)](#)
- South Australia - [National police certificate](#)
- Tasmania - [Police history record checks](#)
- Victoria - [National police records check](#)
- Western Australia - [Police checks and certificates](#)

Federal Police

Residents of the Australian Capital Territory (ACT), Jervis Bay Territory and other external Commonwealth territories should contact the Australian Federal Police at:

<http://www.afp.gov.au/what-we-do/police-checks/national-police-checks.aspx>

National Security Hotline: 1800 123 400 or hotline@nationalecurity.gov.au



NATIONAL SECURITY HOTLINE
1800 123 400
Trained operators take every call seriously.
You can remain anonymous.

Every piece of information that we receive from members of the public today could prove to be invaluable in keeping Australia safe from terrorism tomorrow. It is often the details that make the biggest difference. So if you see or hear something that just doesn't feel right, please call the National Security Hotline and keep the information flowing.

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