

Protection of the Public & Counter-Terrorism Awareness Policy

1. Purpose

Rayan Facilities Management Ltd aims to take reasonable and proportionate steps to protect members of the public who may be affected by our operations. This policy aligns with the Health and Safety at Work etc. Act 1974, national counter-terrorism guidance, the SIA Approved Contractor Scheme, ISO 9001 and ISO 14001 frameworks.

2. Scope

This policy applies to all employees, subcontractors and workers representing Rayan FM across all assignments.

3. Legal & Reporting Responsibilities

Emergencies: Dial 999. Non-emergency police: 101. Counter-terrorism concerns: ACT online or 0800 789 321.

Rayan FM follows HSWA principles by taking reasonably practicable steps to protect members of the public through risk assessment, training and safe systems of work.

All staff must comply with SIA licence conditions where relevant. Any breaches may be escalated internally and, where required, reported to the SIA.

4. Counter-Terrorism Awareness & Preventive Measures

Security and cleaning staff must maintain situational awareness and report suspicious behaviour, items or activity. Relevant staff must complete ACT Awareness; frontline personnel complete ACT Security.

Officers are not expected to investigate or gather evidence, but they are required to maintain vigilance, conduct dynamic risk assessments, and use proportionate, confidence-based engagement where appropriate (e.g., polite enquiries), in line with site instructions and their training

5. Identification & Assistance of Vulnerable Persons

All staff may encounter vulnerable individuals. Concerns must be reported via site instructions. Staff must act respectfully and avoid escalation beyond their training.

6. Staff Safety

Staff must not place themselves at unnecessary risk. Dynamic risk assessments should guide actions. Staff should report hazards, unsafe conditions or suspected criminal behaviour to Control and preserve evidence safely without intervention beyond training.

7. Environmental Responsibilities

Public protection activities should support Rayan FM's environmental management approach: proper chemical handling, avoid unnecessary idling, control waste, report spills promptly, and adherence to ISO 14001 processes.

8. Martyn's Law (Terrorism Protection of Premises Act 2025) Readiness

Rayan FM will adopt applicable Standard or Enhanced Duty measures for client premises once statutory Home Office guidance is issued. Preparations will remain proportionate and reasonably practicable.

9. Incident & Near-Miss Reporting

All incidents affecting public safety, suspicious behaviour or near-misses must be reported to Control promptly. Rayan FM will review trends and implement improvements as part of its management systems.

10. Financial Crime, Suspicious Activity & SAR Escalation

Employees may occasionally observe behaviour suggesting possible money laundering, criminal property or terrorist financing. While Rayan FM is not a regulated financial entity, the company will take reasonable steps to escalate concerns appropriately.

Suspicious Activity Identification: Staff should remain alert to unusual possession of valuable items, suspicious deliveries, irregular access attempts, or behaviour of concern and must report internally

Internal Escalation: Where an employee knows, suspects or has reasonable grounds to suspect criminal property or terrorist financing, they must report it confidentially to the Money Laundering Reporting Officer (MLRO) as soon as reasonably practicable. Staff must not alert the subject of the concern.

MLRO Decision: The MLRO reviews information and determines whether external disclosure is appropriate.

SAR Submission: Where required, the MLRO submits a SAR to the NCA. Staff do not submit SARs directly. Confidentiality is maintained.

Post-SAR: Staff continue duties normally unless instructed otherwise. Disclosure of SAR activity is prohibited.

Training: Proportionate awareness training will be provided to help staff recognise and escalate concerns

Protective Clause: Nothing in this policy requires employees to investigate, confront individuals or make legal determinations. Rayan FM will take reasonable steps aligned with national guidance without assuming obligations beyond those required by law.

Signed:



Name: Siobhan Hamill

Position: Managing Director

Date: 19/01/2026

