2. Physical Security

Cargo handling and storage facilities in domestic and foreign locations must have physical barriers and deterrents that guard against unauthorized access. Where applicable, there must be written and verifiable procedures in place.

A. Perimeter Fencing:

1. Perimeter fencing or walls should enclose the vicinity around cargo handling and loading areas, as well as storage facilities.

2. All fencing must be inspected on a regular basis to safeguard integrity and check for damage. Gates are the only openings allowed in fencing or walls.

3. Gates must have adequate locks.

4. Appropriate levels of security must be in place to monitor the integrity of a secure perimeter.

Security Quick Tips: Perimeter Fencing

- The facility’s perimeter should be cleared of vegetation and debris that could be used to breach fences.
- Post “No Trespassing” signs at regular intervals along the fence/wall.
- Conduct routine security patrols of the perimeter at varying time intervals. (Do not patrol at the same time every day.) For added security it is recommended to also utilize surveillance, anti-intrusion devices and lighting.
- Fencing should be 8 feet (2.4 m) high and constructed of solid material or 9-gauge galvanized steel with 2 inch (5.08 cm) wide chain link construction. Fencing should be topped with an additional 2 foot (0.61) high barbed wire outrigger strung with 3 rows of 9-gauge galvanized barbed wire slanted at a 45-degree outward angle above the fence. The bottom of the fence should be no more than 2 inches (5.08 cm) from the ground.

B. Interior Fencing:

Interior fencing within a cargo handling area should be used to segregate domestic, international, high-value and hazardous cargo.

1. Dangerous goods/hazardous materials must be marked and segregated within the warehouse. Access to the hazardous materials storage area must be restricted. If necessary, hazardous materials may require secondary containment.

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2. International cargo must be segregated from domestic cargo and clearly identified as such.

3. Access to the warehouse should be restricted to authorized personnel only.

4. Entry and exit of persons should be monitored.

Security Quick Tips: Fencing—Segregation of Cargo

- High-value cargo should be stored in a separate area of the warehouse with added security features in place.
- The factory should segregate NORDSTROM merchandise from other merchandise within its warehouse. It is preferred that such segregation be in the form of a physical barrier (a separate room, vault or fenced-in area), instead of merely a demarcation (lines painted on the floor).
- The warehouse should be equipped with camera surveillance and alarms.
- When segregating goods, physical barriers, such as separate rooms, fences or other room dividers, should be used. (See pictures below.)

Examples of acceptable segregation solutions.

C. Packing and Loading Areas:

The packing and loading areas for international cargo must be restricted to assigned personnel and include fencing and/or signs that physically define the space.

1. The packing area (the area where finished products are put into shipping cartons) and the loading area (the area where shipping cartons are loaded onto the conveyance or into a container) must be secured in a manner that makes it possible to restrict access to these areas to authorized employees only.
2. No one should be allowed to enter these restricted areas unless they have authorization.

3. Both the packing and loading areas should be closed off to all transit activities.

4. Access to these zones must be restricted to prevent this type of unauthorized foot-traffic.

**Security Quick Tips: Packing and Loading Area**

- Access to packing and loading areas should be restricted based on business need and job function. For example: Office employees do not normally need access to the loading area; sewing employees usually do not need access to the packing area, etc.

- It is understood that this may require some factories to change their processes. Factories may have set up the packing area as the last step of the finishing department. Their workers may currently move back and forth between different elements of finishing. Only by restricting access to these areas, will factories by able to satisfy US Customs requirements. We ask our factories to work in partnership with us in finding creative and workable solutions to this high-risk issue.

There are several ways to successfully restrict access to the packing and loading areas:

- Issue badges to employees in different colors to designate their employment status, position and workstation. This color-coded system allows easy identification of employees in a restricted zone.

- Post signs in the packing and loading areas stating “Restricted Area” that include the names and photos of all current employees. Posting the identities of employees makes it easier for security guards or supervisors who enter the workstation or monitor the areas through cameras, to recognize when unauthorized individuals are present. These signs should be checked monthly to ensure that they remain updated.

- Station a security guard or supervisor in the area. This person must either check employees’ badges to verify their employment or be able to visually distinguish employees who are authorized to work in these areas. If the factory elects to have a supervisor ensure that only employees working in the specific department enter the area, this additional responsibility must be included in the supervisor’s job function.

- While it is acceptable that the supervisor attends to additional duties while ensuring that only authorized employees are in these areas, he or she must be aware of the additional responsibility related to restricting access to these areas to authorized employees only.

- Posting the number and/or pictures of employees working in the packing/loading departments allows a security guard or supervisor to more accurately identify unauthorized individuals who may be present.

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• Install a physical barrier (fence, door, gate, turnstile, etc.) that can be passed only by authorized employees (swipe card, key, access code).
• Remotely monitoring access points to restricted areas via CCTV system.

D. Gates and Gate Houses:

1. Gates through which vehicles and/or personnel enter or exit must be manned and/or monitored.
2. The number of gates should be kept to the minimum necessary for proper access and safety.

E. Parking:

1. Private passenger vehicles should be prohibited from parking in or adjacent to cargo handling and storage areas.
2. It is best to paint “No Parking for Private Vehicles” on the ground in the immediate vicinity of the handling and storage areas.

Security Quick Tips: Parking

• If the factory premises are too small to establish a “No Parking” zone in the immediate vicinity of cargo handling and storage areas, an alternative solution is to remove all private vehicles from the premises whenever loading or unloading takes place. At small facilities, this does not usually occur on a daily basis.

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• Alternately, the factory can use portable fences (as used on construction sites) to establish a secure perimeter around the loading area.

• Portable fences/barricades (see pictures below) can also be used to make the loading area secure when the loading gate is shared with other facilities in the same building. This is often the case in Hong Kong, Macao, Taiwan, Korea where land is limited. (See pictures below.) Fences can be erected temporarily while loading activities take place to ensure that unmanifested material is not loaded.

F. Building Structure:

Buildings must be constructed of materials that resist unlawful entry. The integrity of structures must be monitored and maintained by periodic inspection and repair.

1. Production buildings and warehouses should be constructed of durable and impenetrable materials that prevent unlawful entry and protect against outside intrusion. These materials include, but are not limited to:

   a. Cement

   b. Wood
c. Cinderblock
d. Metal
e. Brick

2. The only openings in such buildings should be:
   a. Doors
   b. Windows
   c. Vents
   d. Cargo gates, etc. Corrugated plastic sheeting should only be used as roofing, not as sidewalls. (See picture.)

![Corrugated Plastic Sheeting](image)

3. Openings, such as vents and utility holes greater than 96 square inches (.06194 m²), through which unauthorized entry may be gained, should be blocked/covered as necessary. Air conditioners and vent covers should be secured to the structure.

4. When considering renovation of existing buildings and planning construction of new buildings, security is an aspect that should be taken into account.
G. Locking Devices and Key Controls:

All external and internal windows, gates and fences must be secured with locking devices. Management or security personnel must control the issuance of all locks and keys.

1. Doors: All exterior doors must be outfitted with functional locking devices.

   Examples of appropriate door locks.

2. Windows: All ground floor windows must be equipped with functional locking devices that prevent opening the window from the outside. Alternately, window bars or mesh wire can be used to secure windows.

3. Exterior doors and ground floor windows must be locked when the building is not occupied.
4. Key controls: When keys are given to employees, this act should be noted in a key logbook. (See Appendix of Forms, Form B.) Keys must be returned when an employee is terminated. If a key is not returned, the locks must be changed. High-security keys (keys that cannot be duplicated) should be used.

**Security Quick Tips: Locking devices**

- A person should be responsible for making sure that doors and windows are locked after the last employee leaves for the day.
• If the facility relies on swipe key cards or other electronic locks, records of door openings should be maintained for at least 6 months.

H. Lighting

Adequate lighting must be provided inside and outside the facility for the following areas: entrance and exits, cargo handling and storage areas, fence lines and parking areas.

Security Quick Tips: Lighting

• Instead of installing a light fixture above each entry point, a factory could choose floodlights aimed at the exterior that illuminate the entire building complex.

In certain regions, several factories may share a building. In these cases, the doors to the individual factory are considered access points. They could for example be in a hallway (See pictures, next page).

• The lighting system should be checked on a daily basis by security guards on patrol and maintained professionally on a semi-annual basis. All maintenance records should be kept.

• Outside lighting should be controlled by a “dusk to dawn sensor” that automatically switches “on” when illumination levels decrease (storms, dusk, etc.) This type of lighting is also the most energy efficient.

• The parking lot must be illuminated, preferably by floodlights.
I. Anti-Intrusion Systems:

1. Alarm systems and/or video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to cargo handling and storage areas.

2. Communications devices and/or procedures must be in place to alert security personnel and external law enforcement if intruders are present.

3. Where electronic surveillance is not in place, a written and verifiable business process must meet the intended purpose of factory surveillance.

Alarms:

1. The factory should be equipped with an anti-intrusion alarm system.

2. All access points (doors, windows, dock door, etc.) should be connected to the alarm system. Motion detection devices should be activated in sensitive areas (packing area, warehouse) after business hours.

3. The alarm system should have backup power, in case of power loss or failure plus wireless backup in case of telecommunication system failure. It should connect to either local law enforcement officials or a private security company.

4. Access to the control room and the alarm system itself should be highly and selectively restricted.
5. The alarm system should be tested internally on a regular basis and maintained professionally on a semi-annual basis. All maintenance records must be kept.

6. Alarm codes should be secure. When an employee who has knowledge of any alarm-codes is terminated, the codes must be changed. This process is to be documented on the Terminated Employee Checklist. (See Appendix of Forms, Form A)

7. Detailed records of alarms (even accidental triggering) should be maintained for at least 90 days.

8. Ideal alarm systems are the ones that automatically alert a third-party security provider or local law enforcement personnel if security has been breached. It is recommended that such alarm systems are equipped with wireless backup to ensure that they function even if main telephone lines have been compromised.

Closed Circuit Television System/Surveillance Cameras:

1. For optimal security, the factory building and its perimeter should be equipped with security cameras feeding real-time pictures to a control room where pictures are monitored by a guard and recorded by a recording device.

2. Such tapes should be maintained in a secure location for at least 90 days. All CCTV images should be recorded in real time, and no more than 16 cameras should be recorded per disk or tape. If the facility uses a VCR, there should be no more than 12 hours of images on one tape.

Security Quick Tips: Anti-Intrusion

• Preventive maintenance for all alarms and video cameras should be scheduled on a quarterly basis. Records of all maintenance must be kept.

• Although sophisticated cameras can record even without adequate lighting, most models require adequate illumination in order to deliver a clear picture. Thus, illumination must be considered when installing cameras.

• Cameras are a very useful tool for monitoring and recording access to restricted areas (warehouse, packing area, loading area).
• As an additional deterrent, signs should be posted throughout the premises, stating, “This facility is equipped with a video surveillance system. You are subject to recording.”

• Posting the number and/or pictures of employees working in the packing/loading departments allows a security guard or supervisor to more accurately identify unauthorized individuals who may be present.

• The security staff member monitoring the cameras should consistently evaluate the activity within restricted areas. If suspicious activity occurs, or there is an unaccounted overage in the number of employees, the security staff member should follow factory process for resolution.

Communications System:

1. The factory should have an internal communications system in place to contact security personnel and/or local law enforcement.

2. Employees must be made aware of how to reach security personnel. Posters noting this procedure should be posted throughout the work floor and in other areas of the factories premises.

3. The factory should have a means of communication on the premises that is accessible by at least one person on site at all times. Example: if the only phone on the premises is in the manager’s office, which is locked after the manager leaves, at least one person among those who stay longer should have a key to the office.
4. A factory should have a backup communication system in case the primary system fails due to a mechanical problem (power outage) or from manipulation (clipped phone lines).

5. The functionality of the communications system should be tested on a regular basis and maintained professionally on a semi-annual basis. All maintenance records must be kept.

J. Security Personnel:

1. The factory should employ security personnel to patrol the grounds and ensure the physical security of the premises.

2. Management should verify that security personnel make regular rounds in patrolling the premises.

3. If security personnel are not feasible (high personnel costs, small size of factory), an employee at the factory should be designated as the person in charge of security. This individual should receive special training (see Education and Training).

Security Quick Tips: Security Personnel

- Security Personnel can be monitored by using a DETEX style watchman's clock system that records when a security guard is at a given point. Detex devices can be obtained from a variety of companies such as http://www.wescottcompany.com/detexpag.htm.