# DAVID BRADLEY BONNELL DIRECTOR GLOBAL SECURITY INTERCONTINENTAL HOTELS GROUP

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### "THE MUMBAI ATTACKS: A WAKE-UP CALL FOR AMERICA'S BUSINESS SECTOR"

# **Summary Statement**

As the terrorist attack unfolded in Mumbai on 23 February, 2009, individuals responsible for the counter terrorism program of their respective corporations were in almost constant contact sharing with each other timely and detailed information concerning the events and circumstances of the attack. From this association of corporate security professionals came a flow of intelligence that facilitated critical crisis response decision making, the effective deployment of resources and the flow of constructive internal communications between global corporate headquarters and hotels impacted by the attack.

Armed with reliable intelligence concerning the nature of the attack as it was occurring, the InterContinental Hotels Group (IHG) was able to provide its two Mumbai properties with instructions and resources that enabled those hotels to quickly secure and defend against an attack.

In days following the attack, this association of corporate security professionals shared information concerning various resources that enabled recovery and restart of Mumbai business operations confident that reasonable action had been taken to mitigate what was now a foreseeable and predictable threat in that part of the world.

This association of corporate security professionals evolved as the result of the efforts of the Department of Homeland Security (DHS). In bringing private sector security and crisis management personnel together in an effort to increase preparedness in the private sector, DHS laid the foundation for an association of hotel corporations that has served IHG well.

The relationship between DHS and IHG has been beneficial at both a strategic and tactical level. From enabling corporations to understand what constitutes a viable and defensible disaster recovery/business continuity plan to how a hotel should effect an evacuation in response to a bomb threat, DHS has shown how it can be done.

# **Title IX Compliance**

Title IX of the 9/11 Commission Act provided us with a map to crisis management planning expressed in terms of,

"Preparedness in the private sector and public sector for rescue, restart and recovery of operations should include (1) a plan for evacuation, (2) adequate communications capabilities, and (3) a plan for continuity of operations."

In seeking to achieve the stated goals of Title IX, DHS enabled private sector security professionals to share best practices through its various meetings, conferences and frequent communications.

What has evolved in the hospitality private sector as a result of this information sharing are crisis management/counter terrorism programs that are threat based and intelligence lead. DHS and the Overseas Security Advisory Council (OSAC) both provide much of the intelligence that is used in deploying resources against emerging threats.

# **Legal Duty**

Since the 19<sup>th</sup> Century, the legal and moral duty of a hotel concerning safety and security has been articulated in terms of "reasonable care" which is legally defined as the, "manner in which a prudent and responsible person responds to a foreseeable and predictable threat." The threat of a terrorist attack against a hotel has now become a conspicuously foreseeable and predictable threat, particularly in those parts of the world where a Jihadist threat exists.

### **IHG**

There are currently 4,186 hotels around the world bearing the InterContinental Hotels Group (IHG) brands of, InterContinental Hotels, Crowne Plaza Hotels, Indigo Suites, Holiday Inn, Holiday Inn Express, Candlewood Suites and Staybridge Suites. The majority of these hotels are franchised and privately owned.

The world headquarters of IHG is located in the United Kingdom near London. The regional office for properties in the Americas is located in Atlanta, Georgia and the office for the Asia Pacific region of IHG is located in Singapore. There are 27 corporate facilities that support the business to include business service centers, reservation centers, data centers and sales offices.

IHG seeks to fulfill its legal and moral duty concerning safety and security through a crisis management system that has taken a great deal of direction from the goals of Title IX.

# **IHG Crisis Management System**

Integrated throughout the corporate structure, culture and operation of the InterContinental Hotels Group (IHG) is a comprehensive Crisis Management System that provides a flexible and effective response to foreseeable and predictable threats. The system consists of; continuous threat assessment; site-specific emergency action plans and business continuity plans; a senior executive crisis response plan; crisis response teams; an internal communication network; and crisis/emergency response training programs.

The IHG Crisis Management System responds to crisis through a process that follows operational management structures, existing lines of communication and established business relationships. By following the organizational chain of command, crisis management escalates as needed through a process that connects all corporate operations to a common crisis command organization.

The IHG Crisis Management System incorporates for its 27 corporate support facilities viable disaster recovery/business continuity plans and programs. Monitored and tested annually, IHG is confident in its ability to quickly restore essential business functions either from temporary or permanent locations.

Another critical component of the IHG Crisis Management System is the counter terrorism program.

### COUNTER TERRORISM PROGRAM

The IHG counter terrorism program is, as previously stated is threat based and intelligence lead.

The program consists of:

Categorizing all IHG hotels against a terrorist risk profile.

Conducting a regional strategic threat assessment for each hotel location.

Conducting a comprehensive assessment of the capabilities of the hotel to resist an attack.

Providing an management action plan for increasing security capability

Monitoring plan compliance.

Our counter terrorism program is then implemented within the context of mandatory compliance with brand standards concerning both operational and structural safety and security. For example, if a hotel is to be constructed within a region that is categorized as being high risk, Security Design and Engineering requirements are imposed.

The program is then reinforced through both security site visits and quality audits.

It is during the assessment of the property that a determination is made as to plan for evacuation, communication capabilities and a plan for continuity of operations.

#### **OSAC**

As the IHG counter terrorism program evolved, the value of the intelligence and information provided by the US State Department sponsored Overseas Security Advisory Council (OSAC) became apparent. Of equally obvious value was the OSAC sponsored Hotel Security Group of which IHG is a member.

Like DHS, the OSAC brought private sector security professionals together in an effort to improve the security capability of the business.

IHG is also closely affiliated with the American Society of Industrial Security (ASIS) and NFPA in seeking to acquire knowledge concerning emerging risks and methods of mitigating those risks.

Respectfully submitted,

David "Brad" Bonnell