

# GUIDE TO SECURE CARAVAN STORAGE

# **CONTENTS**

Introduction		3
Identifying the Threat		4
In-Depth Security		6
	Perimeter Protection Access Control Alarm Systems CCTV Lighting Asset Tracking	
Fire Protection		25
Ancillary Matters		33
	Vermin Guard Dogs Emergency Plans Planning Indoor Storage	
Administration		39
	Site Processes IT systems Records Contracts Damage Description Site Fees Business Rates VAT CRiS Legal Requirements Law of Lien – Possession Notices	
Industry Approved Organisations		47
British Standards		48

# **Cassoa Guide to Secure Caravan Storage**

This guide has been prepared for the use of both existing and new caravan storage sites. The term caravan shall be used, but this is to include motorhomes and any other vehicles permitted into storage.

For the new site this information will act as a comprehensive guide to secure storage, for the established site it will act as a source of reference.

# A successful storage site will be founded on the following elements:

- Organisational An effective site management system which controls access, and facilitates the storage of caravans and staff processes.
- Physical robust physical protection; fencing, gates, barbed wire, anti-ram bollards.
- Electronic Technical detection systems that supplement physical protection CCTV, alarms, sensors, lighting.
- IT An effective administrative system incorporating software needed to support the security system.

# ALL MUST INTEGRATE, WITH REGULAR REVIEWS AND MAINTENANCE TO ENSURE PROTECTION

The world of security products and general security principles can be, and is very often, a minefield of technical terms and sales rhetoric. To the consumer any advice needs to be concise, accurate and practical; otherwise the likelihood of it being acted upon is remote.

The advice contained within this guide is presented to cover all threats that may be associated with the storage of caravans. The main threat undoubtedly comes from theft, and therefore it has been examined in greater detail. From the outset any security scheme should be; economical, effective, and workable.

# **IDENTIFYING THE THREAT**

The principles of security are to identify the threat to the caravans, followed by an assessment of the likelihood for harm; and finally the implementation of a strategy to eliminate or control any potential risk.

The threat to stored caravans will come from:

#### The threat to stored caravans will come from:

- Theft: Either theft of, or from, the caravans.
- **Criminal Damage**: Primarily caused in the process of theft.
- Accidental Damage: Caused by customers on site.
- Fire: Either accidental or deliberate.
- Flood: Either by location (flood plain), or very heavy rainfall.
- Falling Trees: Where trees surround the storage area.
- **Storm Damage:** From insecure structures, and discarded material.
- **Vermin**: An inherent feature of storage areas, especially on farms.

#### **Assessing the Threat**

- **Theft**: Although the number of thefts has been reduced over the years in whatever form it is still too high, with urban storage areas more at risk than those in rural areas.
- **Criminal Damage**: Again a higher risk in urban areas.
- Accidental Damage: There will be a higher risk of damage on sites with limited turning spaces and narrow roadways.
- **Fire**: The threat of fire is always there, and is aggravated when combustible material is stored in quantity nearby.
- **Flood**: There is always a danger of flooding in low-lying areas, and sites that are bounded by waterways.
- Falling Trees: An ever-present danger in exposed wooded rural areas.
- Storm Damage: A potential threat from insecure buildings.
- **Vermin**: Vermin are attracted to locations where there may be waste food and/or shelter.

#### **Eliminating the Threat**

The opportunities to completely eliminate the threat will be rare.

- **Theft**: The threat cannot be completely eliminated.
- Criminal Damage: The threat cannot be completely eliminated.
- Accidental Damage: The threat cannot be completely eliminated.
- **Fire**: The threat cannot be eliminated.
- Flood: Flood defences can eliminate the threat.
- Falling Trees: Trees can be felled in extreme cases or cut back where felling is prohibited.
- **Storm Damage:** Unsecured dilapidated buildings can be removed, or repaired.
- Vermin: Realistically, all types of vermin with the capability to infest or cause damage are difficult to eliminate.

#### **Protecting against the Threat**

This is the time to apply the principle of protection.

- Theft: The best way to prevent theft is to deny potential intruders access to the target.
- Criminal Damage: Use damage resistant material and repair damage promptly as poor maintenance can attract criminals.
- Accidental Damage: Provide adequate roadways and parking assistance if required.
- Fire: Remove any sources of ignition, combustible material, and provide the correct fire-fighting equipment.
- Flood: Familiarise staff with Environment Agency Flood Plan. In periods of heavy rain check adjoining water levels for obstructions.
- Falling Trees: Keep trees well-trimmed so that they do not hang over caravans.
- **Storm Damage:** Repair any damaged buildings, and carry out regular checks for damage.
- Vermin: Install a recognised vermin control regime



#### IN DEPTH SECURITY

In-depth security is simply a combination of physical security supplemented by electronic detection measures.

This combination should deny or delay access to any intruder arriving at the target and increases the likelihood of detection. The casual thief would not breach this level of protection. Even the determined thief with the right tools would have difficulty and would need time - a commodity they does not have.

- Define your boundary
- Deter thieves
- Detect intrusion
- Delay intruders
- Control Access

#### **Perimeter Protection**

PERIMETER PROTECTION - What our accreditation matrix will assess

- Open to parts where public access may/can be gained
- Perimeter comprised of mound, ditch, natural vegetation or similar where public access may/can be gained
- Fully enclosed perimeter
- Fully enclosed perimeter (to BS standards)
- Additional protection Armco barrier or similar

Quality of fencing to be noted

Does the fencing act as a visual deterrent or actual physical barrier.

The first line of defense in any security scheme designed to protect against property loss is the perimeter fence.

# **Fencing Height**

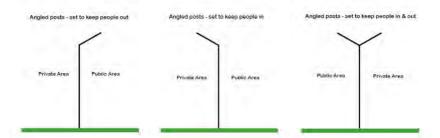
For general purpose use, the height can vary from 1.5 to 2.4 metres above ground.

For security use, the recommended height varies from 3 to 3.6 metres.

For caravan storage, 2.4m is a good starting point. Ultimately, the higher the fence, the harder it will be for intruders to scale. Other features like barbed wire toppings, Y-shaped extensions, and vandal proof connectors should also be considered.

The following basic guidelines outline the correct settings:

- To keep people out of a private area the posts should be angled out over.
- To keep people in a private area the posts should angled in over .
- To keep people in and out Y shaped posts should be used.
- When a fence adjoins a building ensure that the building cannot be used as a climbing aid. This is best done by fitting an arc of anti-climb spikes onto the top of the fence, and the side of the building.
- When erecting boundary/perimeter fencing, avoid creating right angles wherever possible, as they can be used to bridge the fence.



If possible the fence posts should be set at 2 metre intervals to prevent a caravan passing between the posts. This may be difficult as fencing horizontal parts are normally pre-cut to length, and it will add to the cost. As an additional measure interior posts can be installed off-set to the main posts.

# **Types of Fencing**

#### Welded Mesh

- Anti-climb
- Different standards available, so you must ensure that the standard protects again bolt cutters, claw hammers etc.
- Offers medium to high security, and almost impossible to climb over.

#### Vertical Bar / Palisade

- Offers greater strength and durability. Made from tubular steel which can be powder coated to protect against rusting.
- Concealed panel to post connectors and tamper proof bolts.



#### **Additional Protection**

- Fence Mounted
   Detection / Perimeter Intrusion Detection System (PIDS)
  - This will detect attempts to cut, climb or penetrate the fence. Can be integrated with existing alarm systems/CCTV.
- Armco barriers
- Electronic perimeter beam protection is an excellent deterrent when used in tandem with mounds/ditches to detect a trespass.
- Electronic communication alerts e.g. CCTV detecting movement, sending snapshots to smart devices.

A combination of preventive and detection measures will provide a very secure perimeter. Remember, if they can't get in they can't steal the protected property.

#### Secured By Design Fencing

This is a Police security initiative which gives certification to companies which provide products that have been tested to meet relevant security standards. For security fencing to meet Secured By Design status, it should be tested to CPNI security standards or LPS1175.

Secured by Design

These are essentially specific requirements to provide protection against digging, climbing, and penetration through the barrier.

It is recommended that fencing is designed, installed and maintained to BS Standards.



**Police Preferred Specification** 

#### **Natural Barriers**

As an alternative and/or addition to proprietary fencing, mounds and ditches can be created. They form an effective barrier to prevent theft of caravans, but it is important to remember they cannot prevent pedestrian access and therefore the threat of theft from of vandalism of caravans cannot be completely eliminated.

Natural barriers can include rivers, lakes, wooded areas and slopes. Where these are not naturally present, earth bunds and ditches can be constructed. It is important to remember that these solutions alone cannot prevent pedestrian access and therefore the threat of theft and vandalism will not be eliminated.

Bunds / ditches must be:

- Robust
- High & Steep
- Wide

When used, mounds need to be at least 1.5 metres high with a 3 metres base. Any redundant material can be recycled into the mound to add to its purpose of denying access to an intruder.



An enquiry should always be made with the planning authority as a security mound may require planning permission — it could be classed as Operational Development. In addition, bringing in earth/soils may be regarded as a 'deposit of waste' for which further regulations apply.

Cautionary notes: Where water is used as a defence, the threat of flooding must be assessed.



# **Access Control**

#### ACCESS - What our accreditation matrix will assess

- Manual access system with single gate
- Manual access system with multiple gates
- Electronic access control with single gate
- Electronic access control with multiple gates
- Multiple electronic access controlled gates with additional protection such as anti-ram bollards

#### Things to consider:

- Is access shared with other businesses?
   Does this compromise security?
- Is access during business hours or 24/7
- Do site owners manoeuver caravans into spaces or are public allowed within compound
- Do staff manoeuver caravans or do the public have access to the compound?
- Prevent tailgating

#### The purpose of controlling access to a secure area is twofold:

- To deny unauthorised users access or egress;
- To monitor the movement of authorised users.

All exit/entry gates should be robust and designed to withstand a determined attack.

Fundamental to the efficiency of any access control system is a single exit/ entry point, ideally with an air-lock system to prevent tailgating. The term 'airlock' refers to a combination of two or more doors/barriers being using in sequence in order to gain access to the controlled area. The release of the second barrier is conditional on the closure of the first barrier.

The majority of automated systems activate a barrier. On unmanned sites this is not recommended, as the barrier alone does not present a robust physical deterrent.

A height restriction barrier is an efficient and practical means of controlling caravan movement on and off the site. The height of the barrier should be clearly displayed.

What an electronic access control system should be able to do:

- Log the time, date, and identity of those using exit/entry.
- Anti-pass back control that prevents tailgating.
- Activate CCTV to record certain events, and incidents.
- Produce a site audit showing what should, and should not be on site.
- Use cards, fobs or biometrics to confirm identity.



#### Main Considerations:

Gates should be hung on anti-lift hinges and be supported by a nose wheel to prevent stress to the gateposts. In addition, the hinges and sliding locking bar should be protected to deter attacks using burning and/ or cutting tools.

Where keys are issued to plot holders for the exit/entry gate and movement on and off the site is restricted to opening hours, it is good practice to change the padlock on the gate during the out of hours period.

With electronic gates, access is usually gained with a token. A token may be any of the following:

- Code
- Swipe card
- Key fob
- RFID (contactless smart cards)
- Biometrics (fingerprint or facial recognition)
- Mobile Devices

Two-factor authentication should be considered – where two 'tokens' are required for entry. Readers will be placed at the access point to verify the tokens and allow or deny entry. These are then combined with system computer software to record and monitor access.

# **Gate Types**

Safety should be a priority with gates. They should be installed by an approved professional and serviced regularly.

Automated gates, regardless of the type, are required by law to comply with EU Machinery Directive 2006/42/EC. They should have emergency stop functionality, and lights to alert forthcoming movement.

#### Swing gates

These are robust and easy to control. They can be manual or automatic. Whilst they do require clearance space, they are more affordable than sliding gates.

# Sliding gates

Allow quick, automated access. The motor should be able to withstand the number of times it'll be expected to open and close throughout the day.

#### **Barriers**

Whilst these don't prevent pedestrian access, they can restrict unauthorised vehicles.

#### Road Blockers & Bollards

Supplemental to main access gates

# **Alarm Systems**

#### ALARM SYSTEMS - What our accreditation matrix will assess

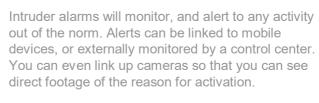
- External motion sensors
- Tamper fence guard or similar
- Intruder alarm linked to mobile devices/CCTV
- Externally monitored systems
- Externally monitored alarm system which covers CCTV controls, keys & customer data

Two types of alarm systems should be considered – perimeter alarms and building alarms.

- Perimeter alarms will monitor and alert to any site intrusion to ultimately protect the customers' assets caravans.
- Building alarms should protect business assets CCTV equipment, keys, customer records etc.

#### Types of intruder alarm

- Bells only auditory alert only
- Bells & alert auditory alert and contact made to key-holder
- Monitored alarm manned center will provide 24/7 monitoring
- Smart alarms connectivity with mobile devices & integration with CCTV & access control.



Basic intruder alarms will only sound if there has been an intrusion into the property. This leaves very little time for a response – the intruder may have gone by the time you or the police have arrived.



Intruder alarms now can detect vibration, triggering an alert allowing you to see CCTV footage to see whether there is any suspicious activity.

Going even further, intelligent alarm systems can start to work out what may be a false alert – reducing the changes of wildlife or wind causing unnecessary alarm.

#### **CCTV & Surveillance**

#### CCTV & SURVEILLANCE – What our accreditation matrix will assess

- Aged, basic system
- Entry, Exit, Perimeter Coverage
- Full coverage entry, exit, perimeter +assets / with lighting support if required
- Full coverage entry, exit, perimeter +assets / with lighting support if required, notifications internally or externally
- Full coverage entry, exit, perimeter +assets / with lighting support if required, notifications internally or externally + Analytic / Al driven (norms & exceptions)

#### Things to consider

- All systems must be fully compliant with data protection regulations
- All systems Proof of system maintenance required. Log documents.
- All systems Footage saved for a 'reasonable' period of time -30 days
- Quality of image to be noted. Can usable evidence be retrieved?

CCTV should complement and not replace other security measures. Ideally it should be part of an integrated system to protect against property loss.



#### **Types of CCTV Systems**

- CCTV paired with Smart Alarms help confirm false alarms or actual threats.
- CCTV paired with access control ability to link access control events to cctv footage / detection of tailgating with real-time alerts to mobile devices.
- ANPR Automatic number plate recognition.

#### What should CCTV do?

- Deter criminals
- Monitor risk
- Capture evidence / Detect Person of Interest / Recognise number plates

#### The choice of a CCTV system is dependent on:

- The level of the security risk.
- The level of available lighting.
- The neighbouring environment.
- Whether the system is to be monitored on site or remotely.
- If it is to be used in conjunction with other equipment.

Cameras should be effectively placed around the compound with no blind spots. Ideally, all areas of the compound should be covered, but it is absolutely essential that access points are monitored.

Night footage should be an essential requirement. Infrared (IR) CCTV can record at night and in low light – this removes the need for security lighting.

Given that the main purpose of CCTV is to capture images for evidence, it is essential that the images are good quality.

For detection purposes, a person should fill around 25% of the screen. For recognition purposes, a person should fill 50% of the screen. For identification, a person should fill 120% of the screen and be easily identified. This is known as the Rotakin Test and should be familiar to all installation engineers.

An outdated CCTV system with poor quality images is next to useless.

### Old systems:

- Reduced quality & accuracy
- Insufficient storage capacity
- Vulnerable to cyber attacks
- Increased risk of breakdowns

#### **CCTV** Footage

Footage can be saved on a hard drive, or remotely in cloud storage. Cloud storage can provide almost unlimited storage whereas local storage is limited. Cloud storage is more secure and won't be compromised if there is a fire or security breach on site. If you're saving your footage on a hard drive, it's important that there is sufficient security in place to secure it.

How long you keep footage for is largely dependent on your storage capacity. Official guidelines state that footage should be kept for a "reasonable" amount of time, and for no longer than necessary. 30 days is most common.



#### **CCTV Signage**

Signs should be prominently displayed warning that CCTV is in use in order to comply with GDPR. The signs must be of adequate size e.g. A4 for foot traffic, and A3 for vehicular traffic. The signs must include the identity of the

responsible person/ organisation, complete with

contact details.

As the owner of a CCTV system you become the Data Controller and are therefore responsible for the storage, viewing, maintenance and protection of the footage.

Where personal data is processed, The Data Protection Act 1998 requires that CCTV systems may have to be registered with the Information Commissioner's Office.

The act also sets out a code of practice that advises on data processing procedures. The registration fee is £35.00. It is recommended that individual proprietors enquire with the Information Commissioner's Office www.ico.org.uk.



#### **Further considerations:**

A sign indicating that the system is recording 24 hours could indicate to the criminal that the site is not manned 24 hours thus giving an intruder time to remove a caravan before the theft is discovered and the CCTV viewed. It would be prudent to have a sign that did not include the recording details.

The use of dummy CCTV cameras is not recommended. By fitting such cameras, a proprietor could be exposing himself to legal action in the event of a loss occurring on the site. The person suffering the loss may sue for misrepresentation if the dummy cameras were an inducement to take up the storage. Dummy cameras have no place in a consumer contractual agreement.

As with all security systems, it is essential that maintenance is carried out on a regular basis and logged.

#### **CCTV Analytics**

Advances in technology mean that CCTV is now capable of doing more than just recording footage.

Software can automatically analyse video content in real time.

- Appearance Facial recognition can detect repeat offenders, or specific elements can be programmed as problematic – red car, black jacket, etc.
- Fixed algorithm analytics is programming based on rules which can recognise certain behavior by process of elimination – e/g spot an active presence in a restricted area
- Artificial Intelligence algorithms is an extension of fixed algorithm analytics but the software will learn what 'normal' activity is then raise alerts for abnormal activity.

CCTV systems can be linked to mobile devices and monitored externally.



# **Additional Security**

#### ADDITIONAL SECURITY - what our accreditation matrix will assess

- Security lighting part site / motion sensored
- Security lighting full site / motion sensored
- Asset tagging to record & alert movements
- Physical walk round checks
- Active presence on site
- Airlock system

# **Security Lighting**

The purpose of security lighting is to deter and detect intruders. It increases the vulnerability of an intruder.

Security lighting unless well planned, correctly installed and maintained, may not hinder an intruder but help to light his way or provide shadows in which he can hide.

Whilst security lighting is often a necessary component for other security elements such as CCTV, it can also stand in its own right acting as a deterrent to intruders, and reassurance for owners.

Think about how useful the lighting is going to be – it won't be much use if it illuminates an area which can't be seen by onlookers or CCTV.

#### Security lighting should:

- Complement physical and electronic features.
- Illuminate the intruder on his approach.
- Conceal a defender from an intruder.
- Illuminate protected premises.
- Operate from dusk to dawn.
- Be mounted out of reach of intruders and protected against missiles.
- Lamp standards should be positioned so that they cannot be used as climbing aids.

#### **General Considerations:**

Maximum recommended height for lighting columns would be 8m.

- Shouldn't be placed within 2m of a perimeter fence so that they do not aid an intruder in scaling the fence.
- Supply and cable controls should be buried and protected from potential vandalism.
- Back up supply for power failures solar powered, battery
- It is most important that any security lighting is based upon a survey carried out during the hours of darkness. In addition, the surrounding area should be viewed to assess the impact on the night landscape.
- If the property is overlooked then some consultation may be required to ensure that the lighting will not constitute a nuisance, an invasion of privacy, light spillage, or light pollution.
- In addition, attention should be given to the effect of lighting on the natural habitat of nocturnal animals, migrating birds, insects. To minimise any disruption, the following is encouraged:
- Use of motion sensors to limit time lighting is in use
- Aim outdoor lighting downwards
- Replace high energy bulbs with CFLs and LED floodlights.
- Planning Authorities may require a report from a lighting consultant before agreeing to security lighting being installed.
- For a more detailed analysis of security lighting visit the website of The Institution of Lighting Engineers: www.theilp.org.uk.



# **Lighting Types**

#### **LED Security Lights**

Low running costs, output the same lumen rating at a much lower wattage than traditional bulbs. Need replacing a lot less often. Most effective



when installed at a height that prevents vandalism. Can be used with motion sensors

# PIR (Passive Infrared) Security Lights

Triggered by changes in temperature (the temperature of a human body). Essentially motion sensors. Cost effective as they're not on all the time.

#### **Solar Security Lights**

Economical and eco-friendly. Easy to install as they don't require wiring.

#### **Asset lighting / Flood lighting**

These provide uniform lighting on the vertical surfaces of a building of interest – to show an intruder against the illuminated background.

#### **Event activated lighting**

Usually activated by PIDS (Perimeter Intruder Detection System).

#### **Entrance lighting**

Lighting levels around access points will normally be higher than normal.

Lighting should be maintained regularly, with records kept. This should include date of visit, faults, causes, repairs, name of technician.

# **Asset Tracking**

Access control and recording which caravans are on or off site can now be achieved with a combination of computer software and asset tagging.

Station Software is a software company who have developed a system which combines asset tags, a uPASS long range reader and SecureSite software.

The tags and reader are able to communicate to the SecureSite software to detect and record caravan movements on site as well as prevent unauthorised removal of caravans

SecureSite then integrates with Storage Manager – storage site management software – to update customer records with movement information.

**Storage Manager** 

www.storagemanager.co.uk

# **Security Padlocks**

There are a multitude of locks on the market, each with its own use.

European Standard EN12320\* introduced the standard of 6 grades of security, with 6 being the highest. All padlocks grade 3 or above will have a key retention facility which simply means you cannot remove the key when the padlock is in the open mode.





#### **Closed Shackle Padlock**

Wherever possible a closed shackle padlock should be used, as they are difficult to crop using bolt cutters.

#### **Sliding Shackle Padlock**

As an alternative, a sliding shackle could be used as they are also difficult to crop.

Open Shackle Padlocks are not as secure because they can be vulnerable to attack by bolt croppers.

As a matter of best practice never leave locks hanging on the gate when in the unlocked mode. The lock could be substituted, stolen, or sabotaged.



# **Key Security**

Good key supervision is vital in any security scheme where the proprietor removes and fits caravan security devices. The keys should be kept in a purpose made secure cabinet, away from the storage area. Buildings used for storage should be protected by an intruder alarm.

For ease of use and identification purposes all the keys should be numbered, and correspond with the bay of the stored caravan. When choosing a padlock, if possible consult a master locksmith.

Where plot holders are issued with a key for the exit/ entry gate, the key should be registered to prevent extra keys being cut.

Sites which use card readers should be aware that it is possible to get key cards/ fobs duplicated at high street retailers. To minimise this risk, two factor authentication should be used to verify identity.



#### **Fire Protection**

Whilst caravan storage is primarily outdoor, a Fire Risk Assessment should still be carried out.

According to the Regulatory Reform (Fire Safety) Order 2005, all businesses with more than 5 employees are required by law to carry out a FRA.

It does apply to caravan storage and CaSSOA recommends that even businesses with fewer than 5 employees carry complete one.

Employers and self-employed people must carry out, or appoint a competent person to carry out a suitable and sufficient fire risk assessment of the risks of fire to their employees and others who may be affected by their work or business.

Those who employ five or more employees should keep a formal record of any significant findings and remedial measures, which have, or may need to be taken.

The competent person or fire risk assessor need not possess any specific academic qualifications but should:

- Understand the relevant fire safety legislation;
- Have appropriate education, training, knowledge and experience in the principles of fire safety;
- Have an understanding of fire development and the behaviour of people in fire;
- Understand the fire hazards, fire risks and relevant factors associated with occupants at special risk within the buildings of the type in question, and
- Have appropriate training and/or experience in carrying out fire risk assessments.

#### Fire Risk Assessments

Whilst the legislation does not define 'suitable and sufficient', it is generally considered that a risk assessment should do the following:

# 1. Identify the fire risks arising from or in connection with work:

- Sources of ignition.
- Sources of fuel
- Sources of oxygen.

# 2. Identify the location of people at significant risk in case of fire:

It will be necessary to identify the areas that persons will frequent, whether they be employees, customers, visiting contractors etc.



#### 3. Evaluate the risks:

- Are existing fire safety measures within the premises adequate?
- Are sources of fuel and ignition controlled?
- Is there adequate means for detecting fire and giving warning?
- Is there adequate means of escape in case of fire from all parts of the premises?
- Has adequate and appropriate fire-fighting equipment been provided, and is it suitably located?
- Is there an adequate testing and maintenance regime in place for fire precautions within the premises?
- Have employees been adequately trained in fire safety procedures within the premises and in the use of fire-fighting equipment?
- Has the site considered the dangers of lithium batteries and solar panels?

#### 4. Record findings and action taken:

- Record, plan, inform, instruct, and train.
- Record any major findings and action you have taken.
- Discuss and work with other responsible people.
- Prepare an emergency plan.
- Inform and instruct relevant people.
- Provide training.

#### 5. Review

Review your fire risk assessment regularly.

- Make changes as necessary.
- Generally the review date should be one year from the date of completion of the risk assessment, however it may be necessary to set an earlier date depending on the type of premises, processes carried out, etc.



- Employers and the self-employed are expected to take reasonable steps to help themselves identify fire risks, e.g. by looking at appropriate sources of information such as legislation and codes of practice, or by reference to a competent individual.
- For small premises presenting few or simple hazards a suitable and sufficient fire risk assessment can be a very straightforward process.
- For medium sized premises, the fire risk assessment will need to be more comprehensive. Some areas of the assessment may require specialist advice, particularly in complicated buildings.
- Large and complex premises will require the most developed and sophisticated fire risk assessments particularly where fire engineering solutions have been developed to overcome difficult fire safety issues.
- Fire risk assessments must also consider all those who might be
  affected by the undertaking whether they are employees or others
  such as contractors working on site or members of the public.
   Particularly attention should be given to those individuals who are
  especially vulnerable, such as children, the elderly or those with
  disabilities.



#### 6. Significant findings should include:

- The significant hazards identified in the assessment. That is, those
  hazards which might pose serious risk to workers or others who might
  be affected by the work activities if they were not properly controlled;
- The existing control measures in place and the extent to which they
  control the risks (this need not replicate details of measures more fully
  described in works manuals etc but could refer to them);
- The population which may be affected by these significant risks or hazards, including any groups of employees who are especially at risk.

This advice is a summary only of the requirements of the order, and site owners are advised to contact their local Fire & Rescue Service for further guidance.

# **Fire Extinguishers**

An essential issue in fire protection is to ensure the correct equipment is used, for both prevention and fire-fighting.

For example, where free burning combustible material is stored near the storage area, a hose reel is the most effective method of tackling a blaze.

BS EN3\* was introduced in 2002 to bring Fire Extinguishers in use in the UK in line with the rest of Europe.

The type of fire extinguisher you use will depend on the materials which are burning.

- Class A fires combustible materials: caused by flammable solids, such as wood, paper, and fabric
- Class B fires flammable liquids: such as petrol, turpentine or paint
- Class C fires flammable gases: like hydrogen, butane or methane
- Class D fires combustible metals: chemicals such as magnesium, aluminium or potassium
- Electrical fires electrical equipment: once the electrical item is removed, the fire changes class
- Class F fires cooking oils: typically a chip-pan fire

All Fire Extinguishers must be red, other than a coloured area to indicate the type of extinguisher

All fire protection equipment should be:

- Serviced, maintained and in good working order.
- Protected from adverse weather conditions.
- Recharged as per the manufacturer's specification.
- All fire points should be readily identifiable as such by the use of both words and a pictogram.
- General advice is that extinguishers should be placed so that you don't have to trtavel more than 30 meters to reach one – so 60 meters apart.

For more information on the types, use and colours of fire extinguishers please visit www.firesafe.org.uk.



#### **Fire Alarms**

If you have buildings within the caravan storage compound, fire alarms will be required.

When choosing the type of fire alarm, it should be established what the system need to protect; property or life. This will influence the detection system more suitable and its placement within the building.

#### **Fire Alarm Systems**

#### **Conventional Fire Alarm Systems**

These systems break a site down into zones, and each zone will have its own warning light on a control panel. These are generally used in smaller buildings.

#### **Analogue Addressable Systems**

These systems are more precise and used in larger settings. Software can be programmed to carry out actions when triggered, like calling the fire brigade. These systems require the installation of wiring within walls.

#### Wireless Fire Alarm Systems

With no need for cabling, installation is more straightforward. However, without mains power, you'll need to remember to change the batteries regularly.

#### **Networked Fire Alarm Systems**

These systems can manage multiple buildings/areas within a site, networking various control panels which can be viewed from a central control panel. Given the complexity, they should be installed by an accredited professional.



#### **Fire Alarm Types**

- Ionisation Alarms sensitive to small particles of smoke produced by fast flaming fires
- Optical alarms detect larger particles of smoke from slow-burning fires
- Heat alarms detect increases in temperature (not triggered by smoke)
- Multi-sensor alarms combine optical and heat detection.

Weekly and monthly testing and maintenance of the fire detection and alarm systems should be carried out and logged.

An out of date system can be dangerous – by either failing to detect a fire, or causing a false alarm and wasting the time of emergency services.

The National Fire Protection Association recommends that fire alarms be replaced every 10 years. After this time, there's a risk that the sensitivity will decrease.

#### **Placement of Caravans**

Each stored caravan should be allocated around 30 square metres of space, with the respective caravan jockey wheels set at a distance of at least 3 metre centres. Where caravans are parked back to back there should be a 1 metre wide corridor between the rows to act as a firebreak.

#### **Gas Bottles**

The removal of gas bottles is a complex area following the introduction of the Regulatory Reform (Fire Safety) Order 2005.

If it is not reasonably practicable to remove the gas bottles they should be turned off, and disconnected from the internal appliances.

The onus of showing that it is not reasonably practicable to remove the gas bottles lies on the proprietor who will be identified as the 'responsible person'.

Wherever possible the respective owners should remove the gas bottles from caravans.

# **Ancillary Matters**

#### **Vermin Infestation**

Vermin can infest caravans and cause considerable damage, and most if not all insurance policies exclude liability for what is termed vermin infestation.

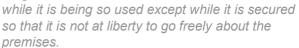
As a matter of site practice, it is recommended that liability for vermin infestation be excluded, however this can only be done if a recognised vermin control regime is in place.

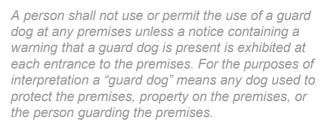
In the absence of control, a proprietor may be liable for any damage caused by vermin. The Court of Appeal has extended the legal scope of liability for nuisance to include damage caused by vermin\*.

# **Guard Dogs**

The Guard Dogs' Act 1975 regulates the use of dogs which are used to protect premises and is summarised as follows:

A person shall not use or permit the use of a guard dog at any premises unless a person (the handler) who is capable of controlling the dog is present on the premises, and the dog is under the control of the handler at all times





There is no doubt that dogs are an excellent deterrent, and if used within the legal requirements of the act, they should present no problems.



## **Flooding**

Recent extremes of weather that are predicted to continue have caused major damage. In particular flood damage has been extensive.

Site owners need to be aware of the different levels of flood alert, the dangers from flooding and the correct response.

There may be situations when severe flooding is predicted. If there is enough time, and it is safe to do so, caravan owners may be contacted to remove their caravan from the potential threat.

However, the logistics and impact of this should be carefully considered. Large numbers of caravans and motorhomes being collected at once may cause further problems.

#### How are warnings issued?

Sign up to flood warnings for free by visiting:

www.gov.uk/sign-up-for-flood-warnings

You'll need to provide:

- the address you want flood warnings for
- an email address
- a way to contact you at any time of day or night you can choose to get a call, text or email

For Scotland: https://floodline.sepa.org.uk/floodingsignup/

For Wales: https://naturalresources.wales/flooding/sign-up-to-receive-flood-warnings







#### **Power Failure**

Adverse weather such as flooding and storms may result in disruption to power supply. There should be provisions and procedures in place to maintain security.

Most access control and security systems will have inbuilt battery backup which will allow your system to continue working for a period of time. If your security system does not have a backup power supply it may sound an alarm when the power cuts out. You should be able to disable this with a code.

- Check your backup systems in case of a power failure. During an outage, safety systems such as smoke alarms, sprinklers and illuminated exit signs need a way to remain powered, so consider investing in safety systems that have a battery-powered backup option.
- Provide alternative security keep spare padlocks. to temporarily secure access points. Consider hiring a security guard until power is restored.
- Notify customers of any changes to security if the safety of their vehicle is compromised.
- Call your utility company for updates.
- Have an emergency kit available for staff emergency water, first aid supplies, flashlights, some rope and other basic items.
- When power is restored Check the equipment and appliances for damage.

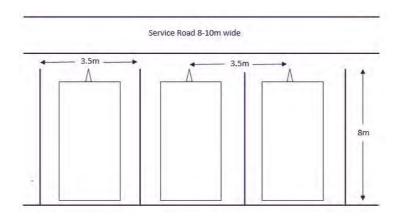
# **Planning**

A layout and design strategy based on the following caravan measurements should maximise the space available and minimise the potential for collisions on site.

As a rough guide to estimating the potential viability of a proposed storage site each stored caravan should be allocated around 30 square metres of space, with the respective caravan jockey wheels set at a distance of at least 3 metre centres. The individual parking bays should be a minimum of 8 metres in length, with the access roads at least 8 metres wide.

Across the main caravan and motorhome manufacturers, minimum and maximum sizes are as follows:

- Caravan min = 4.8m x 2.2m
- Caravan Max = 10.0m x 2.5m
- Caravan ideal pitch size = 8.0m x 3.5m
- Motorhome Min = 5.6 x 2.2m
- Motorhome Max = 9.0m x 2.5m
- Motorhome ideal pitch size = 10.0m x 3.5m



The space recommended between each caravan (hitch post to hitch post) is 3.5 metres

- Bays should be as spacious as possible to allow for customer access and allow for the axle tracks of turning circles so that caravans/ motorhomes can enter and exit without cutting corners of adjacent bays.
- Dead ends are undesirable as this encourages reversing which may increase the likelihood of accidents.
- Consideration should be given to entry points, and whether there will be a combined or separate entry and exit.
- Pedestrian access points should be minimised.
- One way traffic is recommended for good movement and to maximise storage area.

- Clear direction arrows and speed restriction signs can help to minimise the potential for accidents and collisions.
- Plots should be arranged in straight rows to aid surveillance and avoid blind spots. However, whilst rectangular layouts can maximise space, diagonal layouts allow for easier entry and exit. Rectangular layouts require the driver to change direction of travel by 90 degrees, whilst diagonal layouts only require a change of direction by 45 degrees.

### **Planning Permission**

In the majority of cases planning permission for change of use will be required. The type of planning approval usually required is "B8 - Storage and Distribution" to include outside storage.

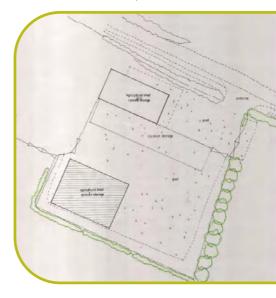
In granting planning permission, a Planning Authority may impose conditions to the permission, such as: the number of caravans to be stored, security recommendations, opening hours, and landscaping to screen the site.

The conditions listed are not exhaustive merely an indication of what may be imposed. Site proprietors must comply with all such conditions; failure to do

so could lead to permission being withdrawn, or enforcement action taken.

A planning application should be set out along the following lines:

- Introduction setting the scene.
- Agricultural Land Classification (where applicable)
- Economic reason for the change of use
- Projected income from the proposed change of use.
- The need and demand for the new business.



- Refer to any relevant paragraphs in The National Planning Policy Framework which came into force on 27/03/12 and was revised in 2021.
- If the land is in a flood risk area then a flood risk assessment will be required.
- A planning application that is likely to have an impact on the local traffic will be referred to the Highways Department. It is a good idea to write to the Highways Authority at the same time as asking for preapplication advice. A Transport Statement may be required.
- All planning applications require a Design & Access statement that should be concise and deal with both of the aspects required.
- If photographs are to be submitted ensure that they are indexed with a brief description of each image.
- For an application to succeed it will be assessed on its merits and compliance with the Local development Plan.

### **Indoor Storage**

Elements to consider when planning indoor storage

- Fire protection alarms and suppression
- CCTV at access points & internally
- Alarm system
- Access Points roller shutter doors / manual or electronic
- Watertight but well ventilated
- Will units be manoeuvred by staff or customers
- Lighting



# **Administration**

Good site administration should be implemented in order to compliment good site security to ensure the site runs smoothly.

#### Site Processes

Elements to consider when planning the processes of the day to day running of a storage compound:

- Will customers visit by appointment or will they have access 24/7
- Will customers manoeuvre into their storage plot themselves, or will staff park?
- Where/how will visitors / vehicles be registered before access to site is given – will this be manual or electronic?
- Staff should conduct daily physical walk around checks to check for presence on site and potential issues with vehicles (windows open, leg steadies not down, damage)
- Will additional services be provided? Calor gas, valeting, servicing
- Maintenance of all systems should be carried out regularly to include date of visit, faults, causes, repairs, name of technician.
- Maintenance of grounds should be carried out to ensure fencing is not damaged, trees aren't overhanging, vegetation isn't overgrown.

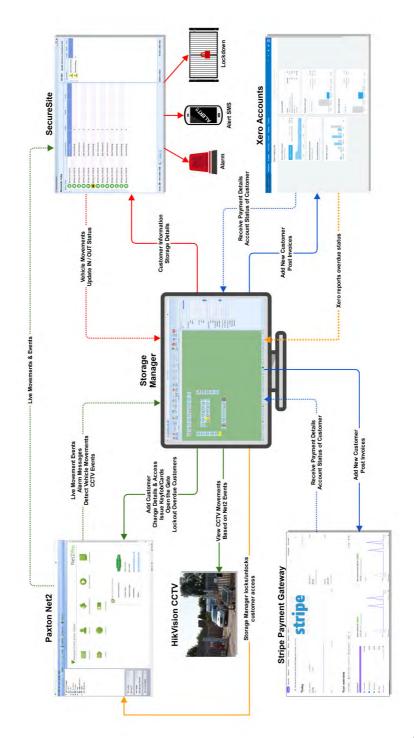
### **Site Management Software**

Storage Manager is computer software developed to help you manage all aspects of your Caravan Storage site.

The software records all details of customers, caravans, insurance details, invoices, reminders and many other details to help you run your site as efficiently as possible.

This software can manage all aspects of Caravan Storage sites, and can also integrate with internet enabled CCTV and Paxton Access Net2 Access Control Systems.

www.storagemanager.co.uk



#### Records

Accurate records should be kept of all plot holders which should be updated as and when necessary. All details provided should, wherever possible, be verified either by driving license or passport. In particular, if someone is seeking storage for an old caravan for a short period, ask for some documentary evidence of address such as a utility bill.

Records should be stored in accordance with GDPR (General Data Protection Regulations). If you process (hold, use, store, transmit or delete) personal data about your customers, clients, employees or suppliers, you are legally obliged to comply with GDPR.

These are the general requirements:

- Understand, in detail, the personal data you hold, why you hold it, who you share it with, how it is kept secure and how long you retain it.
- Only collect and process data for the legitimate reasons set out under the GDPR.
- Only collect the minimum amount of data you require for the purpose it is needed.
- Keep the data accurate and up to date.
- Make sure you know what security is being applied to protect the data, make sure that this is adequate, and ensure any qualifying breaches are reported to the regulator.
- Make sure that you do not retain data indefinitely, and that you follow a retention strategy, or that the data is anonymised.
- Make sure you are able to respond to requests to have access to, or delete, the data from the individuals.
- Make sure you do not send data outside of the EEA without the required additional
- protections being applied.
- Make sure that you have written contracts in place with any third parties who you may share personal data.
- Make sure your privacy notices, which advise customers or employees how you use their data, contain the information required under the GDPR and are readily available.

If you undertake any direct marketing via telephone, email or other electronic means then you need to comply with the Privacy and Electronics Communications Regulations as well.

For more information visit www.ico.org.uk

## **Storage Contract**

A written contract is strongly recommended for storage conditions and site discipline. In the event of a dispute the terms of the contract are binding on both parties. All contracts must be fair and reasonable in their terms, and meet the requirements of Unfair Terms in Consumer Contract Regulations 1999.

A contract term can be deemed unfair if it creates a 'significant imbalance' in the trader and consumer's positions. Standard terms may be drafted to protect commercial needs but must also take account of the interests and rights of consumers by going no further than is necessary to protect those legitimate commercial interests.

Photo ID, registration documents and proof of address should be requested in order to ensure the customer is the registered owner of the caravan. A CRiS check can help to confirm this.

Terms must also be in plain language and if not, the interpretation which favours the consumer will apply.

Proprietors need to be aware that plot holders may take advantage of a site where there is no written contract. CaSSOA does have a sample contract available to members.

### Vehicle Insurance

The plot holder's insurance documents should be examined prior to the storage contract being exchanged. It would be wise to check that the insurance is valid for the term of the storage contract, and applies to the caravan or motorhome being stored.



### **Damage Description**

When a caravan is first admitted onto the site it should be examined and any damage noted on a damage description form, which should be signed by the caravan owner and the site owner.

Ideally a check should be made each time the caravan is returned, but realistically this may not be possible on each and every occasion. The importance of the initial check assumes greater significance where the site proprietor moves the caravans into and out of the storage area.

#### Site Fees

The site fees will be influenced by the quality of the site, its geographical location, and the economics of the area. On average, a year's storage for an average caravan will be around £620\*.

Undercover storage will usually generate a higher fee, and twin axle caravans are usually larger and therefore can also attract a higher fee.

#### **Business Rates**

As a business you will be required to pay business rates and the amount will be determined by the rateable value of the property. This expenditure has to be taken into account when calculating the annual storage fee. For more data on business rates check www.voa.gov.uk. Some business rate relief may be available.

#### **VAT**

If the gross income from the site exceeds the current threshold of £82,000 then it is likely that VAT will have to be paid at the standard rate of 20%. Over the years at CaSSOA members have challenged the imposition of VAT on caravan storage, unfortunately without success.

# Inheritance Tax—Business Property Relief

For the purposes of Business Property Relief (BPR) Caravan Storage is not a business - it is classed as the making or holding of investments, and as such does not qualify for BPR.

### **Public Liability Insurance**

Public Liability Insurance (PLI) is essential when the nature of the business allows people onto the site for a specific purpose. There will always be the potential for an accident, and therefore insurance should be in place for such eventualities. In the event of any incidents or changes that may affect the insured risk, always notify the insurance company as soon as possible. Failure to make a prompt notification may invalidate a claim. If there is any doubt about notification always err on the side of caution and notify your insurer.

#### **CRIS**

All Caravans produced in the UK since 1992 are issued with a 17 digit alphanumeric code. The scheme is always referred to by those in the trade as CRiS, and is owned and administered by the National Caravan Council.

CRiS is a national register for UK caravan keepers similar to the DVLA for motor vehicles.

#### A CRiS check will:

- Show if a caravan has ever been written off by an insurance company.
- Show if a caravan is subject to any outstanding finance.
- Provide details of the current registered keeper, and detail how many
- owners there have been in the past.
- Confirm the make, model and age of a caravan.

More information about CRiS can be found at www.cris.co.uk or by calling 0203 282 1000.

# Legal Requirements

A caravan storage site involves more than providing a secure storage environment, although security is paramount.

The duty of care was extended by The Occupiers' Liability Act 1984 to include Trespassers, although this extension is restricted to personal injury and does not include damage.

The duty is owed where the occupier is aware a danger exists and the risk is one he may be reasonably be expected to give some form of warning.

By posting correctly worded signs warning of the danger, the duty of care is discharged, effectively eliminating any action for breach of statutory duty or negligence. As a matter of best practice the signs should be displayed facing into the site for visitors, and out for trespassers.

#### Occupiers' Liability Acts 1957 & 1984

The basic principles of occupier's liability are highlighted as follows:

- For legal purposes you will be identified as the occupier of premises the definition of which includes land.
- As the occupier you owe a common duty of care to all visitors who are there for a lawful purpose.
- The duty is to see that all visitors are reasonably safe while using the premises for the purpose for which access has been granted.

### Law of Lien (Possession Notice)

Liens are certain types of rights which one person has over the property of another.

A particular lien is a right to retain goods until all charges incurred in respect of the goods have been paid. As the proprietor of a storage site you can attach a lien to a caravan in storage for which the storage fee has not been paid.

By incorporating this condition into the storage contract it becomes an express agreement; a legal right binding on both parties to the contract.

As a site proprietor you may well ask the question, "How does this affect me?"

Quite simply, some plot holders may get into arrears with storage fees, and abandon the caravan. It is not uncommon for the arrears to exceed the value of the caravan.

Once a lien has been attached to the caravan it remains valid until the due amount is paid or some other form of security is taken in substitution of the lien. Once the lien has been discharged in whatever manner, that is final.

#### **Uncollected Goods**

Where a caravan owner is in arrears, and has not responded to the notification of the attachment of a lien, provision exists within The Torts Interference with Goods Act 1977 for the bailee (site proprietor) to sell the goods and recover the arrears and costs from the proceeds of the sale. Any remaining balance must be retained for the original owner.

There is a clear duty for the seller of the goods to obtain the best price available based on current market value. A sale under section 12 of the act gives good legal title to the purchaser. The above procedure should not be used where the plot holder in arrears does not have legal title in the caravan.

This is perhaps best illustrated where the caravan is subject of a hire purchase agreement. In these cases the hirer has possession of the caravan, but ownership and legal title remains with the finance company until the agreement has been settled.

The Office of Fair Trading has indicated that the ultimate sanction of sale should only be used when all other means have failed. In other words sale of the caravan is the Sanction of Last Resort. It is recommended that legal advice is sought before commencing these proceedings.

# **Approved Associations**

# **British Security Industry Association (BSIA)**

www.bsia.co.uk

### Security Systems & Alarms Inspection Board (SSAIB)

www.ssaib.org

#### **National Security Inspectorate**

www.nsi.org.uk

### **Fire Protection Association (FPA)**

www.thefpa.co.uk

#### **Association of Fencing Industries**

www.afiorg.uk

## **Institute of Lighting Professionals**

www.theilp.org.uk

# **British Standards (BS)**

British Standards (BS) are technical specifications or practices used as guidance for the production of a product or provision of a service. British Standards are not a legal requirement, but if products or services don't comply with standards, they can be unfit for purpose or dangerous.

There are various British Standards applicable to the security features on site namely:

BS 8220-3:2004 – Guide for security of buildings against crime. Storage, industrial & distribution premises.



### **Fencing**

BS EN 1722-1: specification for chain link fences

BS EN 1722-2: specification for strained wire and wire mesh netting fences

BS EN 1772-4: specification for cleft chestnut pale fences

BS EN 1722-5: specification for close board and wooden palisade fence

BS EN 1722-7: specification for wooden post and rail

BS EN 1722-8 : specification for low carbon steel continuous bar fences and hurdles

BS EN 1722-9 : specification for low carbon steel fences with round or square and verticals and flat horizontals

BS EN 1722-10 : specification for anti-intruder fences in chain link and welded mesh

BS 1722-11 specification for prefabricated wood panel fences

BS EN 1722-14 : specification for open mesh steel panel

BS EN 1722-16: specification for powder coatings

BS EN 1772-17: specification for electric security fences

BS EN 1722-18:2011: specification for steel mesh site perimeter temporary fencing systems

#### **CCTV**

BS EN 62676. This series of standards assists installers of CCTV and other interested parties to understand how a choice of grade is to be made and then used to determine the design requirements of a CCTV system.

BS EN 50131/PD6662:2017. This includes the use of NSI or SSAIB approved companies for the design and installation of any alarm systems.

BS 7958:2015 Code of Practice for Closed Circuit Television (CCTV) – Management and Operation

### **Gate Safety & Access Control**

PAS 68:2010 – Impact test specifications for vehicle security barriers

PAS 69:2006 – Guidelines for the specification and installation of vehicle security barriers

BS EN 60839-11 and the SSAIB Code of Practice for Access Control Systems

Automatic Gate Safety Standards & Legislation: BS EN ISO 1200:2010; Safety of machinery

NCP 109 Issue 2 NSI Code of Practice the Design, Installation and Maintenance of Access Control Systems

### Lighting

BS 5489-1 2013 Code of practice for the design of road lighting

BS EN 12464-2: 2007 Lighting of work places, Part 2 Outdoor work places

BSEN 40 and PD6547 - Lighting columns



#### **Intruder Alarms**

BS EN 50131-1:2006 + A2:2017 Alarm Systems – Intrusion and Hold-up Systems – Part 1: System Requirements

DD CLC/TS 50131-7:2010 Alarm systems – Intrusion and Hold-up Systems – Part 7: Application Guidelines

BS 8243:2010 + A1:2014 Code of Practice for the Installation and Configuration of Intruder and Hold-up Alarm Systems designed to generate confirmed alarm conditions

BS 8473:2018 Code of Practice for Intruder and Hold-up Alarm Systems. Management of false alarms

BS 9263:2016 Code of Practice for Intruder and Hold-up Alarm Systems – Commissioning, Maintenance and Remote Support



In the preparation of this guide CaSSOA has been guided by general security principles, and field experience of dealing with the many issues that affect caravan storage.

All of the advice is given in good faith but does not form any guarantee that security cannot be breached. The author does not accept any liability in the event of a breach of any site security.

