

FIREARM DEALERS, REPAIRERS & MANUFACTURERS Handgun Security Policy

ABSTRACT

... a guide to lawful storage of handguns in Western

Australia

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PURPOSE

This handgun security policy has been prepared in accordance with Section 21 of the Firearms Act 1973 and intends to ensure a minimum standard of safety and security within the community relating to the storage of handguns by firearm dealers, repairers and manufacturers.

SCOPE

The Western Australia Police Force Mission is -

To enhance the quality of life and well-being of all people in Western Australia by contributing to making our State a safe and secure place.

The Firearms Act 1973 is "An Act to make provision for the control and regulation of firearms and ammunition, the licensing of persons possessing, using, dealing with, or manufacturing firearms and ammunition, the repeal of the *Firearms and Guns Act 1931* ², and for incidental and other purposes."

This document provides guidance on the minimum requirements for the storage of handguns in Western Australia. This policy intends to ensure firearm dealers, repairers and manufacturers work with the WA Police Force to ensure the safe storage of handguns.

The policy is not intended to determine the standard operating procedures for conducting a firearms trade business, which should be the realm of the business owner/s.

The document is an "In Confidence" document provided to firearm dealers, repairers and manufacturers licence holders to enable them to, at a minimum, meet their lawful obligations under the Firearms Act 1973 and Firearms Regulations 1974.

INTRODUCTION

The secure storage of firearms, particularly handguns remains a high priority for the Western Australia Police Force and the community of Western Australia generally. Law abiding firearm licence holders have worked in consultation with the Western Australia Police Force to develop agreed standards relating to the storage and safe keeping on handguns.

The ongoing threat of serious crime, gang crime and terrorism in contemporary Australia highlights the need to ensure measures are in place in Western Australia to negate the targeting of entities who control and store handguns. In the past 12 months a significant number of firearms have been stolen from commercial and private locations raising the risk to the community. This policy is a collaborative approach with licence holders, members of the firearms industry and community members who are equally committed to ensuring minimum standards are maintained relating to the safe and secure storage of handguns.

LEGISLATION

The Firearms Act was introduced into Western Australian legislation in 1973. The intention of the long title of the Act is "An Act to make provision for the control and regulation of firearms and ammunition, the licensing of persons possessing, using, dealing with, or manufacturing firearms and ammunition, the repeal of the *Firearms and Guns Act 1931* ², and for incidental and other purposes."

Section 16(1)(d) of the Firearms Act 1973 allows for a Dealer's Licence. This licence entitles the holder to deal in firearms and ammunition on the premises named and identified in that licence, to receive firearms for the purpose of their being dismantled for parts; to arrange for the repair or servicing of firearms by the holder of a Repairer's Licence; and authorises the holder or an employee or partner of the holder to have in his or her possession, and to carry in the ordinary course of the business of that dealer,

any such firearm or ammunition or to use it for the purpose of testing it or of demonstrating it to a prospective purchaser.

Section 16(1)(e) of the Firearms Act 1973 allows for a Repairer's Licence, which entitles the holder to repair firearms belonging to persons who are authorised by this Act or any other law to possess them, and possess ammunition for those firearms, on the premises named and identified in that licence, and authorises the holder or an employee or partner of the holder to have in his possession, and to carry in the ordinary course of the business of that repairer, any such firearm or ammunition and to use any such firearm or ammunition for the purpose of testing it.

Section 16(1)(f) of the Firearms Act 1973 allows for a Manufacturer's Licence, which entitles the holder to manufacture firearms or ammunition of the kind specified in that licence on the premises named and identified in that licence and to sell and dispose of such firearms and ammunition at those premises, and authorises the holder or an employee or partner of the holder to have in his possession, and to carry in the ordinary course of the business of that manufacturer, any such firearm or ammunition and to use any such firearm or ammunition for the purpose of testing it or of demonstrating it to a prospective purchaser.

Section 21(1) of the Firearms Act 1973 states that a licence, permit or approval issued or granted under this Act may be made subject to restrictions, limitations or conditions which shall be either specified in the licence, permit or document evidencing the approval or, whether imposed at the time of issue or grant or subsequently, specified in a supplementary document.

Section 32 of the Firearms Act1973 identifies that the holder of a Dealer's Licence, a Repairer's Licence, or a Manufacturer's Licence shall keep all firearms and ammunition in a strongroom or otherwise in safe keeping, securely fastened during any period when the premises are not open for trade.

The Commissioner of Police for Western Australia has determined that due to the risk posed should handguns be obtained by the unlawful access to a firearm dealers,

repairers or manufacturers premise, there must be a clear guidance provided of the security required for the storage of these firearms.

To achieve this all Firearm Dealers, Repairers and Manufacturers licences will be subject of a condition requiring them to meet the minimum storage requirements of this policy.



ABSTRACT

WA Police acknowledge the efforts and support of the firearm industry in the development of this policy and the commercial needs in the purchase, import and trading of firearms within the global industry. As such it is not the intention to restrict the number of handguns that an individual licence holder may possess at any particular location at this point in time, however the secure storage of multiple firearms is a priority for the community.

This policy requires that all handguns subject of a Dealers, Repairers or Manufacturers licence be stored within a strongroom that complies with Australian Standard 3809:1998, or otherwise within a secure room and stored within a safe certified as

- Grade V or above under the Australian Standard 3809:1998;
- Grade V or above under the European Standard 1143-1; or
- Having a cash security rating of AUD\$250,000 or above.

The premises must be fitted with a combined security system that complies with Australian / New Zealand Standard 2201.1:2007, consisting of perimeter sensors; internal sensors; seismic sensors on the strongroom or safe; audible alarm and 24 hour remote dual or multi-path monitoring.

The premises must also be fitted with a Closed Circuit Television system that complies with Western Australia Police Force and ANZPAA recommendations for CCTV systems.

Recommendations on external security

The perimeter of the premises not openly exposed to the community (i.e. side or rear areas of the premises) should be protected by palisade style fencing and gates that comply with British Standard 1722-12:2016. Secured by a Grade 10 security padlock compliant with Australian Standard 4145.4:2002.

All entry points to the premises should be covered by a Commercial grade roller shutter compliant with Australian New Zealand Standard 1170:2002 / 1530:1999, or are protected by crash protection bollards that are compliant with Australian New Zealand Standard 3845:1999 or other appropriate physical barrier as approved.



STRONGROOMS

The first key element identified in legislation, Section 32 of the Firearms Act is for the keeping of firearms and ammunition in a 'strongroom'.

There is however, no definition within the legislation of what a strongroom entails and it has previously been determined using very subjective analysis, creating some confusion within the industry about what is an acceptable standard for a room to be considered a strongroom.

To clarify this and create a firm basis for the determination of compliance with this legislation this policy outlines the definition contained within the Australian New Zealand Standard 3809:1998 – Safes and strongrooms.

This defines a strongroom as follows – "a secure storage unit whose walls, ceiling and base may be constructed from prefabricated panels or cast in-situ". The standard outlines that all sides of a strongroom be of a formed concrete construction.

The standard equates an extra high security strongroom as being utilised by financial institutions and mercantile properties, which fits the commercial trading activities of a firearm dealer. It outlines their resistance grades of XI, XII and XIII.

Grading is determined by a number of tests that include resistance against physical attack, including the use of tools. This provides an estimate of the time that would be required by intruders to gain access to the contents of the strongroom.

To achieve compliance with the standard, a strongroom door must have a resistance value (RU) of either 2000, 3000 or 4500 or an explosive post detonation resistance value of 100, 150 or 225 respectively. Specific details for how the resistance against both physical attack and/or explosive resistance are assessed is contained within Australian New Zealand Standard 3810.

The standards also set out the requirements for the locking mechanism of any strongroom doors. To achieve compliance with the standard, a strongroom door must have a minimum of 1 class C or D lock, either mechanical, electronic or keyed.

However, it is the policy of the Western Australia Police Force that the locking mechanism be either mechanical or electronic only. Key locks will not achieve compliance.

An additional requirement to achieve the standard, is the fitting of a relocker device which activates to prevent locking bolts being retracted or withdrawn during any physical attack that is detected.

NOTE: All handguns subject of these licences, including from displays must be secured within a strongroom of the above standard whenever the premises are not open for trade.

To achieve compliance with this policy firearm dealers, repairers and manufacturers will need to provide certification from a licensed Class 1 security installer as defined in Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 of the Security and Related Activities (Control) Regulations 1997, that the security unit to be used for the storage of all handguns on their premises achieves the above stated grade of resistance under the standard and has the appropriate lock/s and relocker device/s.

SAFES

The next element contained within Section 32 of the Firearms Act 1973 is the term "...or otherwise in safe keeping...".

The Western Australia Police Force determination in regard to this statement as it relates to the storage of handguns is that all handguns on the premise subject of a dealers, repairers or manufacturers licence must be secured within a safe of the standard outlined below, whenever the premise is not open for trade.

Any safe to be utilised must be located within a secure room on the premises. The definition of what is a 'Secure Room' is outlined in the following section.

When defining a safe the Australian New Zealand Standard has again been used which states the following: "Free-standing safe – designed to protect money and valuables against intrusion, usually found in banks, automatic teller machines, commercial, industrial mercantile properties and domestic dwellings."

The Western Australia Police Force have determined that the correct level of storage required for handguns is a safe that is either:

- 1. certified under the Australian New Zealand Standard as grade V or above;
- 2. certified under the European Standard as grade V or above; or
- 3. certified as having a cash rating of \$250, 000 or above.

Any safe with a mass of less than 1000kg must have at least 1 anchoring point. The strength of any anchoring points for any safes that have a mass of less than 1000kg will be 100 kilonewtons (kN).

The Australian New Zealand standard details the requirements for the locking mechanism of any safe. To achieve compliance with the standard a safe must have a minimum of 1 class C lock, either mechanical, electronic or keyed.

However, it is the policy of the Western Australia Police Force that the locking mechanism be either mechanical or electronic only. <u>Key locks will not achieve compliance.</u>

An additional requirement to achieve the standard is the fitting of a relocker device which activates to prevent locking bolts being retracted or withdrawn during any physical attack that is detected.

NOTE: All handguns subject of these licences, including from displays must be secured in a safe of the required standard, within a secure room whenever the premises are not open for trade.

To achieve compliance with this policy firearm dealers, repairers and manufacturers will need to provide certification from a licensed Class 1 security installer as defined in Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 of the Security and Related Activities (Control) Regulations 1997, that the security unit to be used for the storage of all handguns on their premises achieves the above stated grade of resistance under the standard and has the appropriate lock/s and relocker device/s.

SECURE ROOMS

A further part of the requirements under Section 32 of the Firearms Act for the safe keeping of firearms is the need for any approved safe to be housed within a 'secure room' in the premise associated with the licence.

In collaboration with industry representatives the following has been determined as defining the specifications for a 'secure room' and compliance with this policy.

Any room to be declared a 'Secure Room' must:

- be constructed of either, concrete, masonry, compressed cement substrate sheets, steel, steel mesh or another approved material or a combination of these materials;
 - a. in the case of compressed cement sheet be of no less than 24mm thickness;
 - b. in the case of steel be of no less than 2mm thickness;
 - c. in the case of steel mesh either galvanised expanded or galvanised welded mesh construction with gaps of no greater than 100mm;
- 2. not have any direct access from an external area of the premise;
- 3. have a strengthened door able to withstand some physical attack using unpowered tools, including:
 - a. either inward or outward opening door,
 - b. either a solid core door or door clad in 2mm mild or stainless steel,
 - c. either secure concealed hinges or hinge protection to prevent the door from opening if the hinge/s are interfered with,
 - d. double locking mechanism door locks utilising either deadbolt action or bi-lock security key .

If a licence holder intends to utilise a 'shipping container' or similarly constructed storage container it must:

- 1. be secured within a structure on the premise that provides the level of external security and access control provided by the required alarm and CCTV system;
- 2. where the length of the container is less than 3 metres (or 10ft), be securely anchored to prevent any ease of lifting by container handling equipment. This is to involve welding the container on at least 3 points to steel anchors embedded within the concrete floor of the structure that are each capable of withstanding 100 kN of force;
- have at least 1 padlock with shrouded cover for use in securing the centralised door lock, and meeting Australian Standard 4145.4:2002 for security, corrosion and durability. The padlock must achieve a minimum classification 10 on security and classification 4 on corrosion;
- 4. have hinge protection provided in such a way that, if the hinges are removed, the door of the cabinet or container remains in place and locked. This can be done by way of a hook (bracket) and corresponding recess being installed at two points on each of the internal hinge edges of the doors.

Any safe to be used within a secure room must be either:

- a mass of 1000 kilograms or more;
 or
- 2. anchored at the provided points within the safe structure by anchoring devices each capable of withstanding 100kN of thrust.

SECURITY SYSTEMS (ALARMS)

It should be noted that any secure storage unit (strongroom or safe) will only delay intruders determined to defeat the security provided by them.

It is for this reason that a total integrated security system must be in place which will deter opportunistic offenders, delay organised offenders, relay alerts for response and capture investigative and evidentiary material for apprehension and prosecution purposes.

To achieve this it is required that all firearm dealers, repairers and manufacturers licence holders have installed in the licence premise a security system by a licensed Class 2 security installer as defined in Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 Security and Related Activities (Control) Regulations 1997.

The system must comprise the following elements:

- 24 hour, dual or multi path monitoring by an ASIAL Grade A1 control room or as otherwise approved;
- a 'poll' mechanism to ensure the integrity of the system;
- the ability for the monitoring centre to 'visually verify' an alarm via images relayed from the premises;
- multiple sensors or detection apparatus that create an effective detection barrier within the premise, including within any strongroom or secure room;
- coverage of PIR's should overlap to ensure 'detectability';
- the 'walk test' LED lights must not operate when the system is active;
- seismic sensor/s on the strongroom or safe to alert of any physical attack upon it, or attempt to move it;
- a camera loss alert within the system, connected with the associated CCTV units;

- multiple internal sirens located within premise, and 'satellite sirens' (with backup self-power supply) external to the premise;
- duress alarm functionality for use by staff in all areas of the business (showroom, storage area, workshops etc.) during hours of business;
- the system must have an administration log built in;
- the control panel must be remote from any public areas;
- a maintenance schedule implemented and recorded to ensure ongoing integrity.

To achieve compliance with this policy firearm dealers, repairers and manufacturers will need to provide certification from the licensed Class 2 security installer as defined in Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 of the Security and Related Activities (Control) Regulations 1997, that the security system to be used on their premise achieves the above stated standard and has been maintained appropriately.

CLOSED CIRCUIT TELEVISION SYSTEMS (CCTV)

To achieve a Total Integrated Security System for the security of handguns all firearm dealers, repairers and manufacturers premises must have a closed circuit television (CCTV) system fitted to relay alerts for response and capture investigative and evidentiary material for apprehension and prosecution purposes.

In this regard reference is made to the Australia New Zealand Policing Advisory Agency (ANZPAA) recommendations for CCTV, the Western Australia Police Force Local Interpretation Guide on CCTV Systems and the Australian Standard 4806 on closed circuit television (CCTV).

All CCTV systems must meet the following criteria:

The design and installation of the CCTV system must be undertaken by a licensed Class 2 security installer as defined Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 of the Security and Related Activities (Control) Regulations 1997.

It must achieve the design and operation standards as outlined in the ANZPAA recommendations and WA Police Force guidelines. Key aspects of these are:

- all components must meet Australian New Zealand Standard 2201;
- a minimum frame rate of 12.5 fps;
- archive storage for minimum of 7 days before overwrite;
- time and date stamp appears on screen and recording, but positioned to not obstruct important areas on the screen;
- camera placement provides overlap of coverage for premise;
- system incorporates an uninterrupted power supply;
- access to system and recording is via password and details of access logged and retained by system;
- still images can be exported in uncompressed format;

- video can be exported in native format;
- export of images / video can occur without interruption to recording;
- system displays and records video in correct aspect ratio;
- system achieves the face recognition resolution required in Australian Standard 4806.2:

To achieve compliance with this policy firearm dealers, repairers and manufacturers will need to provide certification from the licensed Class 2 security installer as defined in Section 14 of the Security and Related Activities (Control) Act 1996 and Regulation 27 of the Security and Related Activities (Control) Regulations 1997, that the CCTV system to be used on their premise achieves the above stated standard and has been maintained appropriately.

EXTERNAL SECURITY RECOMMENDATIONS

PERIMETER FENCING

A prime consideration for security is the first line of defence against intruders who may seek to gain access to the premises.

The Western Australia Police Force considers that the premise nominated on a dealers, repairers or manufacturers licence should utilise high level security fencing around areas of the premise that are not commonly open to or used by persons not employed by the business.

This should involve the fencing of any side access or rear areas of the premise with 'Palisade' fencing in either a 'D' or 'W' profile as specified in British Standard 1722-12:2016. The post tops of the fencing are to be single pointed or triple pointed.

Any access point/s through the fencing should be gated in compliance with the standard including where applicable rear-hung hinges, anti-climb protection and padlockable drop bolts, or be electronically controlled gates that meet the same standard.

Padlocks for use in securing all gateways should meet Australian Standard 4145.4:2002 for security, corrosion and durability. They should achieve a minimum classification 10 on security and classification 4 on corrosion.

Fencing and gates should be installed by a member of the Australasian Fence Industry Association and certification of installation should be provided in compliance with the British standard and their membership accreditation.

PHYSICAL BARRIERS

In creating a perimeter environment that deters opportunistic intruders and delays organised intruders the area that is public facing should also be protected.

To achieve this security any entry/exit access points for the premise require securing against impact by vehicles (i.e. ram raids). This should be done using either road safety barrier systems (bollards) or approved physical barriers at each of these points of access.

Bollards should be of a style, size and design as set out below:

Standard Pipe (Circular Hollow Section)

- Grade C250;
- Galvanised (can be overpainted if desired but not raw steel);
- Minimum OD 140mm;
- Minimum wall thickness of 5mm;
- Minimum 900mm above ground;
- Minimum 725mm below ground;
- Concrete embedment using 40mpa concrete (high strength) surrounding entire below ground section and below pipe base;
- Maximum spacing of 1.4 metres between pipes (centrepoint to centrepoint) or from last pipe to external edge of access point.

<u>or</u>

Line Pipe (Broadspec – Structural Hollow Pipe)

- Grade C350;
- Galvanised (can be overpainted if desired but not raw steel);
- Minimum OD 168mm;
- Minimum wall thickness of 5mm;

- Minimum 900mm above ground;
- Minimum 725mm below ground;
- Concrete embedment using 40mpa concrete (high strength) surrounding entire below ground section and below pipe base;
- Maximum spacing of 1.4 metres between pipes (centrepoint to centrepoint) or from last pipe to external edge of access point.

or in either case above

Where subsurface embedment is prevented due to proximity of underground services a surface mount will suffice using the same design and specifications as above, however with

- a 40 mpa concrete footing
- footing to be of 400mm square x 400mm deep in dimension
- an embedded threaded steel rod cage within the footing
- structural nuts used to bolt pipe to steel cage and welded in place

Other approved physical barriers can include fixed masonry, concrete or steel planters capable of preventing a deliberate vehicle impact against any opening in the external structure of the premises.

The installation of these devices should be across all access points vulnerable to forced entry by way of deliberate vehicle impacts, including across normal vehicular access points for the premise which can be removed or lowered as or when required for business operation.

SECURITY SHUTTERS

A further component in creating a defensive perimeter to deter or prevent intruders from access into a premise is the installation of security shutter/s across all exterior surfaces constructed predominantly of glass.

All shutters to be fitted should have been tested under Australian New Zealand Standard 1170 and/or Australian New Zealand Standard 1530 for structural integrity and be in compliance with Australian and local building regulations.

It is recommended that irrespective of the width of opening all shutters be fitted onto a minimum 62mm track system, including a bottom track to house the lower edge of the shutter when closed.

The grade of shutter to be fitted is dependent upon the width of the opening involved. Openings of less than 2000mm width may be effectively secured using either a residential or commercial grade shutter. It is recommended that for openings greater than 2000mm a commercial grade shutter is utilised to prevent flexing.

Shutters may be either manually or electrically operated.

SUMMARY

This policy sets out a logical and systematic approach to ensuring the security of handguns stored on the premises of all dealers, repairers and manufacturers licence holders in Western Australia.

In achieving compliance with this policy those licence holders will have a premise, where all handguns are secured when the business is not open for trade, in either:

- a 'strongroom' protected by an integrated alarm and CCTV system that is monitored by an approved control centre.
 or
- 2. an approved 'safe' or 'safes' located within a secure room where both are protected by an integrated alarm and CCTV system that is monitored by an approved control centre.

Compliance will be determined by the appropriate certification being provided by licence holders that ensures not only initial compliance but the ongoing maintenance of those security systems put in place under this policy.

The licence holder may also choose to follow the policy recommendations that the premise is further secured by the combined use of appropriate shutters, physical barriers and fencing to deter intruders.

REFERENCES

Australian / New Zealand Standard 3809: 1998

Australian / New Zealand Standard 2201: 2007

Australian / New Zealand Standard 4806: 2008

Australian / New Zealand Standard 4145: 2002

Australian / New Zealand Standard 3845: 1999

Australian / New Zealand Standard 1170: 2002

Australian / New Zealand Standard 1530: 1999

British Standard 1722: 2016

European Standard 1143-1

Australia and New Zealand Police Advisory Agency, Recommendations for CCTV Systems, 2014

State CCTV Strategy, Local Interpretation Guide CCTV Systems, 2017

National Firearms Agreement 2017

Review of the Firearms Act 1973(WA), Law Reform Commission of WA, 2017