Crisis Management Guide

The Crisis Management Guide has been designed to help your company effectively respond to a crisis situation. Crises, large and small can be minimized if a thorough Crisis Management Plan is in place, is periodically updated and is implemented effectively when a crisis occurs.

Items to Consider

An actual crisis has the potential to:

- Permanently alter or damage the reputation of the company and/or its leadership.
- Place the organization in serious financial jeopardy.
- Threatens the viability of the organization.

Guiding Principals

Managing a crisis is difficult, managing a crisis without a plan is next to impossible. The following key points should always be present:

- Run an ethical business.
- Identify potential internal and external threats and correct them if possible.
- Develop a Crisis Management Plan before it's needed.
- Annually re-assess and update your plan.
- Observe industry trends.
- Have a clear News Media policy.
- Maintain a "Good Will" bank.

Crisis Management Plan Goals

It's important to establish goals when developing a solid Crisis Management Plan. Examples may include:

- · Protecting employees and the public from injury.
- · Minimizing property damage and environmental impacts.
- · Maintaining public confidence.
- · Protecting the reputation of the organization.

Create a Crisis Management Team

A Crisis Management team should be established prior to a full blown crisis. The team may include the following:

- CEO
- Safety & Compliance Manager
- Human Resources Manager
- Legal Counsel
- Operations Manager
- Others

Once the team has been established it is important that a spokesperson be identified. It's important that only authorized and trained persons should speak on behalf of the company. When selecting a spokesperson, keep in mind the level of crisis may dictate who the spokesperson is. A division manager may be appropriate for a small local crisis where the CEO may be appropriate for a national or international crisis.

Anticipate a Crisis

After the establishment of the Crisis Management Team a brainstorming session should be used to identify potential crisis situations. The best case and worst case scenarios should be thoroughly considered. Items to anticipate may include:

- Serious employee injuries/fatalities
- Automobile accidents
- Pollution incident
- Data breach
- Property damage (explosion/fire)
- Theft

When anticipating a crisis it's important to plan for certain contingencies such as where you may establish a command center or an off-site employee gathering place in the event of a total facility evacuation. It's also important to identify the key modes of communication during a crisis such as e mails, texts, social media, etc.

Develop Message Points

When developing message points it is important that you consider both your internal and external audiences. Your employees (internal) are your most important audience as every associate is a PR representative for your organization whether you assign them the task or not. Some key items to remember when shaping your message are:

- Show compassion.
- Ask for patience while you're gathering facts.
- Communicate the core values of your company.
- Stick to facts, never speculate.
- Let the audience know when to expect more information

Corporate Media Policy

Establish a corporate media policy and share it with all your employees. These guidelines should be included in your Employee Handbook and reinforced on a periodic basis. A corporate media policy should be simple and straight forward.

Corporate Media Policy

Only designated individuals may speak with the media or represent the company to any public audience. This includes sharing any information via photographs, videos, tweets or other social media.

Unless designated in advance, all media inquiries will be handled by: ________________________________

Establish a Contact List

Maintain an up to date contact list that's easily accessible during a crisis. Contacts include:

- EPA/OSHA/DNR
- Media (local TV stations, newspapers, radio)
- Key Employees
- Key Customers
- Insurance Carriers/Broker
- Third Party Consultants

Monitor News/Conversation

During the crisis you should be aware of what's being said about your organization via social media, traditional media, by your employees, by your customers and other stakeholders. Gathering information during a crisis allows you adapt your message as needed.

Post-Crisis Assessments

Following a crisis it's important to assess what went right and what could be improved in a future crisis. Critical feedback is important to the future success of the program.

Good Will Bank

A "Good Will" bank is those things that an organization does to generate the perception of being a good corporate citizen within the communities they operate. Having a sizable "Good Will" bank can pay dividends during a crisis by helping to preserve the organizations reputation. Ways to build up a "Good Will" bank include:

- Supporting local charities.
- Allowing employees time to volunteer for worthy causes.
- Donating time and money for local events.
- Assisting other businesses and families during a crisis.

Other Resources

Attached in the appendix are some additional resources which can assist in developing a solid Crisis Management Plan.

Appendix A – Day of Crisis Tips
Appendix B – Media Do's and Don'ts
Appendix C – Developing Message Points
Appendix D – Secure the Incident Scene
Appendix E – Dealing with OSHA

Appendix A - Day of Crisis Tips

Communicate with Emergency Responders and Regulators

- 911
- EPA/DNR/OSHA

Ensure all Employees/Visitors are accounted for

- Ensure no Other Person or Property Is In danger
- Have Family Members been notified?

Secure the Incident Scene

- Restrict Visitors Access
- Lock Gates if Possible

Identify Command Center Location (possibly off site)

- Identify Employee/Family Gathering Site (e.g., Community Center, Church, etc.)

Identify Company Spokesperson

- Appropriate for level of incident
  - » Owner/CEO
  - » Location Manager
  - » Human Resource Manager

Take a few minutes and formulate your message (Employees, News Media, Families, etc.)

- Be Sympathetic
- Stick to Facts
- Don't Speculate
- Don't say " No Comment"
- Reinforce Company beliefs

Meet with Your Employees

- Explain what happened
  - » Who/What/When
  - » Stick to Facts
  - » Don't Speculate
- Explain media policy
  - » All communication goes through Company Spokesperson
  - » No pictures/videos
  - » No Tweeting

Contact the Media

- Control The Message
- Let Them Know When More Information Will Be Available

Report Insurance Claim

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Appendix B - Media Do's & Don'ts

DO talk, saying little is better than saying nothing. Explaining why you can't talk is better than stonewalling. If you want your side of the story told, you must tell it. If you don't, reporters will get a version elsewhere… perhaps from a disgruntled employee that was laid off last week, or a worker who has just witnessed his best friend getting hurt or killed.

DO tell the truth. Reporters will find it out anyway so be honest and accurate when giving information. This doesn't mean you have to give every detail, but be truthful.

DO respond quickly. If you don't, the wrong story may be told and that is tough to erase.

DO emphasize the positive and communicate your corporate message. Remember to emphasize the good safety measures taken, the minimal damage because of good teamwork by your employees, and what the company is doing to minimize the effect of the incident.

DO stay away from liability issues. Don't talk about who is responsible, don't make any accusations, and don't give out company or individual names. Whatever you say may become part of a legal issue, so be as general as possible.

DO take control. If there's bad news, release it yourself before a reporter digs it up and tells the world.

DO make sure your information is accurate. It should be from a reliable source and you should understand the details thoroughly.

DO make sure the reporters know who the spokesperson is. The corporate spokesperson should be the only one authorized to disseminate information to the outside world. It is very important that you "speak with one voice". Keep in mind that no information should be released without being approved by upper management and legal counsel.

DO NOT say anything that is "off the record." If you don't want it used, don't say it.

DO NOT say "no comment," this statement implies guilt. If you don't know the answer tell the reporter you don't know but will try to find out. If the question may lead to an embarrassing answer, give as much information as you can in as positive light as possible. If you make a mistake, admit it and avoid excuses. Explain how you're planning to make things right.

DO NOT be trapped into predicting the future. If the situation is complex and will take days to determine the full extent of the damage, tell reporters that the company will resume full work on the project as soon as possible.

DO NOT wear sunglasses when being interviewed. You will be perceived as being "shifty" and hiding something.

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Appendix C - Developing Message Points

Holding Statements

When a crisis hits, it's important that an organization is prepared to answer questions. The initial step in communicating with the outside world is to develop a holding statement in lieu of just saying "no comment." A holding statement is designed for use immediately after a crisis breaks and can be written before hand during the Crisis Team brainstorming session. The purpose of the holding statement is to buy time until more facts can be determined. A typical holding statement might read like:

> *Our highest priority is the safety of those who have been impacted by the incident. We're working quickly to assure that our employees and our neighbors are out of harm's way. We will provide an update to the media and through social media such as Facebook and Twitter once we've had time to fully assess the situation.*

Key Message Points

After the holding statement has been made it's time to shape the overall message. Some key points to remember when shaping the message are:

- Show compassion for the effected parties.
- Only provide factual information.
- Don't speculate as to what may have caused the event.
- Keep the message as simple as possible.
- The message should be targeted for the specific audience.
- Ask for patience and time to gather facts.
- Let the media and public know when to expect more information.

Core Values

Communicating your organizations core values is important when shaping your message. Try an include statements similar to:

- We strive to operate with the highest integrity and as good stewards.
- We are committed to safety of our employees, customers and communities we operate in.
- We strive for 100% compliance by 100% of our employees, 100% of the time.
- We are committed to the community, this is our home too.

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Appendix D - Secure the Incident Scene

When securing the incident scene the primary goal is to prevent additional injuries or property damage. An incident can frequently attract the curious, both employees and the public, and often there are ongoing operations which can injure bystanders. It's also important to ensure that accident investigators have access to the scene "as is" to determine the root cause and thereby help prevent future occurrences.

Preserve the scene

- Rope off the incident scene and keep the crowd contained until proper authorities arrive.
- Do not allow any removal of debris, unless as part of rescue or treatment of casualties, until investigators arrive. The location and pattern of debris may be important to the investigators.
- If there is property or equipment which may sustain additional damage, take any necessary steps to protect it.

Document the accident facts

- Obtain the names and contact information of any witnesses and anyone involved in the accident.
- Take pictures and make a sketch of the scene and location.
- Record the make, model and serial numbers of any vehicles or machinery involved.
- Were employees taken for medical treatment? If so, who, where were they taken, and how were they transported.

Cooperative with the authorities, but:

- Don't be afraid to ask for proper credentials and validate them.
- Do not admit fault or apologize to anyone, including the police.
- Do not enter discussions regarding 'who did what'.
- Do not discuss mechanical problems or defects with anyone.

This is also a good time to begin gathering records regarding the training of employees and maintenance of machinery or vehicles.

Appendix E - Dealing with OSHA

After a fatality or serious workplace accident OSHA will visit your location. In many cases the visit may happen within 48 hours of reporting the incident. Preparing your management team and employees is essential to properly manage an OSHA inspection. The following points should be considered when anticipating an OSHA inspection.

Before OSHA Arrives

Being prepared prior to an inspection is critical.

- Organize and have available your safety policies and employee training documentation.
- Have your current year and ***three*** prior years OSHA 300 logs up to date and available for the inspector. You're required to maintain OSHA 300 logs for 5 years.
- Prepare both your employees and the crisis management team for the inspection. Some of your employees may be interviewed by the OSHA inspector and you should spend some time preparing them in advance.

When OSHA Arrives

- Verify the identity of the Inspector (State identification with a photo and serial number). Exercise your right to verify the OSHA Inspectors credentials by contacting the local OSHA office if necessary.
- Notify the OSHA Inspector that you need to gather your key employees (Safety Director, Location Manager, Crisis Team, etc.)
- You can request the OSHA Inspector to wait in the office a reasonable period of time (30-60 minutes) for the key persons to arrive. Explain that your policy requires the presence of a management representative during any type inspection.

Opening Conference

During the opening conference the OSHA inspector will notify you as to the purpose and scope of the inspection. He may also ask for the OSHA 300 logs, training records and safety polices at this time. DO NOT GIVE OR OFFER ANYTHING THE OSHA OFFICER DOES'NT ASK FOR.

Key Steps during the Inspection Process

- Determine the ***exact area*** the inspectors are targeting and proceed to that ***area only***. If an inspector sees or views anything suspect (outside of the ***exact area***) they are obligated to investigate it. You should control what they see or view by keeping them in the targeted area only.
- Review the designated areas of the facility as directed by the inspector and answer any questions honestly. ***Answer only the questions asked*** and **DO NOT** offer any additional information. Attempt to move the inspection process along at a reasonable pace.

- Most often the inspector will ask to talk with an employee. This is often a requirement so allow them to select someone they wish to interview. You may request to be present during the interview but most often you will not be allowed.
- If any corrective action is requested, stop the process and correct it immediately if possible. If the correction is more involved, indicate that you will review the correction with Upper Management and have it corrected as quickly as possible
- Do not admit to any violations. It's the inspector's job to determine whether any safety regulations have been violated.
- Bring a camera and if the OSHA inspector takes pictures, take the same picture.
- Take notes as to what the inspector is asking about and what he or she is looking at.
- If you are not comfortable answering a question for any reason, simply state that you would like to check with the appropriate person and will respond to the inspector with the answer.
- Upon completion the inspector will notify you of the next steps which will include: when & how you will be notified of the results; the closing conference date; and how you may appeal citations and fines. If there are no violations, the inspector may close the case immediately.

Frequently Asked Questions

Can I deny OSHA from Inspecting? You may deny OSHA access to inspect your facility but this may not be your best option. Upon denial OSHA can, and has, obtained an inspection warrant. When an inspection warrant is involved leniency is seldom granted.

Can I reschedule the inspection? This depends on your inspector. If you know an area is out of compliance and, more importantly, you can correct the situation then attempting to reschedule the inspection may be appropriate.

What if I don't have safety programs to review? Answer all honestly but DO NOT offer any information that you know is out of compliance unless specifically asked to do so.

Employers have to report the following events to OSHA:

- All work-related fatalities
- All work-related in-patient hospitalizations of one or more employees
- All work-related amputations
- All work-related losses of an eye

Fatalities

Employers must report work-related fatalities within 8 hours of finding out about it.

Employee Injuries

For any in-patient hospitalization, amputation, or eye loss employers must report the incident within 24 hours of learning about it.

Only fatalities occurring within 30 days of the work-related incident must be reported to OSHA. Further, for an inpatient hospitalization, amputation or loss of an eye, then incidents must be reported to OSHA only if they occur within 24 hours of the work-related incident.

Employers have three options for reporting the event:

1. By telephone to the nearest OSHA Area Office during normal business hours.
2. By telephone to the 24-hour OSHA hotline (1-800-321-OSHA or 1-800-321-6742).
3. OSHA is developing a new means of reporting events electronically, which will be released soon and accessible on OSHA's website.

Who is covered by expanding reporting requirements?

All employers under OSHA jurisdiction must report these incidents to OSHA, even employers who are exempt from routinely keeping OSHA records due to company size or industry.

What information do I need to report?

For any fatality that occurs within 30 days of a work-related incident, employers must report the event within 8 hours of finding out about it. For any in-patient hospitalization, amputation, or eye loss that occurs within 24 hours of a work-related incident, employers must report the event within 24 hours of learning about it. Employers reporting a fatality, in-patient hospitalization, amputation or loss of an eye to OSHA must report the following information:

- Establishment name
- Location of the work-related incident
- Time of the work-related incident
- Type of reportable event (i.e., fatality, in-patient hospitalization, amputation or loss of an eye)
- Number of employees who suffered the event
- Names of the employees who suffered the event
- Contact person and his or her phone number
- Brief description of the work-related incident

Employers do not have to report an event if it:

- Resulted from a motor vehicle accident on a public street or highway, except in a construction work zone; employers must report the event if it happened in a construction work zone.
- Occurred on a commercial or public transportation system (airplane, subway, bus, ferry, street car, light rail, train).
- Occurred more than 30 days after the work-related incident in the case of a fatality or more than 24 hours after the work-related incident in the case of an in-patient hospitalization, amputation, or loss of an eye.
- Employers do not have to report an in-patient hospitalization if it was for diagnostic testing or observation only. An in-patient hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.
- Employers do have to report an in-patient hospitalization due to a heart attack, if the heart attack resulted from a work-related incident.

Visit OSHA's website at https://www.osha.gov/recordkeeping2014/faqs.html for more FAQs on what must be reported.

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