THE BLACK BOOK
crisis and communications manual

3RD EDITION

section 1:
risk assessment,
risk reduction

Overview of Crisis Incidents

Animal research is a complicated and emotional issue. During the last several years, animal rights activism has plunged a number of organizations into crisis — both major and minor. Actions against public and private institutions that use animals in biomedical research and testing programs have grown to include nonviolent demonstrations, illegal trespassing, harassment of individual researchers, property destruction, theft and arson.

Unprepared or underprepared facilities have suffered numerous consequences, including:
- Long-term damage to reputation with loss of confidence among external and internal audiences
- Diversion of resources and time
- Deterioration of morale
- Adverse impact on financial supporters, such as funding agencies, endowments and investors
- Shift of management/administrative time and financial resources away from research and research-related activities
- Political intervention and scrutiny
- Community relations problems
- Consumer displeasure

Institutions can blunt the potential impact of animal rights activism significantly by embarking on a precrisis program that:
- Creates understanding and goodwill about animal research with key audiences
- Allows institutions to respond quickly if and when a crisis hits
- Restores relationships through organized and thoughtful postcrisis action

A well-conceived plan reduces the actual emergency response to mere mechanics. In some cases, a crisis even can be avoided completely through careful planning and execution of a precrisis program. A timely response serves both your facility's ability to inform your community and your capacity to present your message while the media and the public focus on the incident. A delay in your response can escalate a small incident into a full-blown crisis with far-reaching consequences to your organization's reputation. The media wants your side of the story *when* it happens. If you respond *after* the event, the media considers the story old news. The worst response to an incident is "no comment." That statement usually creates suspicion that the facility either is guilty or has something to hide.

In short, the key to successful crisis management is to **BE PREPARED**.

The following is a partial list of the most common animal rights tactics that could create a crisis at your facility:
- Break-in/trespassing/laboratory vandalism
- Burglary/theft of property, animals and/or data
- Destruction of property
- Demonstrations/protests/pickets at a facility or a researcher's home

- Sit-in/takeover of office or whole floor of a building
- Death threat/harassment/mail or telephone terrorism
- Arson
- Bomb threat or bomb
- Publicized photos or videos of alleged animal suffering or abuse taken by animal rights infiltrators
- Public member on the IACUC becomes a target
- Researcher becomes a target
- Animal rights group targets your facility for campaign to stop research/celebrity influence
- Challenging the use of pound and/or random source Class B dealer animals
- Fired or dissatisfied employees
- Employees who are animal rights sympathizers
- Complaints to research funding agencies about animal abuse allegations
- New facility construction stalled by protests or requests for additional environmental studies
- False allegations of abuse filed with the USDA and made public
- Freedom of Information Act and/or Public Information Act requests
- Lawsuits filed against facility by animal rights group

Forming a Crisis Management Team

The first step in preparing for, then managing and minimizing the impact of a potential incident, is to form a crisis management team. The team should include an individual from each of the following areas:

- Security
- Public information/public relations/media communications
- Institutional official (individual who gives USDA assurance statement)
- Senior management
- Research administration
- Institutional spokesperson
- Veterinary medicine
- IACUC
- Legal affairs
- Government relations
- Safety

Your crisis management team should be charged with three main responsibilities:

1. Assessing your risk of being victimized by animal rights activity
2. Suggesting and implementing risk reduction strategies
3. Managing a crisis when it hits

Members of the crisis management team should coordinate efforts to assess the risk of becoming a target of animal rights groups. This includes assessing the risk of a crisis by reviewing the facility, employees, protocols, research projects, history of inspections/AAALAC reports, etc. Each crisis management team should do the following:

- Draw up a worst-case scenario list and determine what to do in each case
- Regularly review individual risk assessments
- Regularly update members on new developments
- Tour animal facilities together
- Monitor animal rights activities locally and nationwide

Your Facility and Your Personnel

Determine Facility Vulnerability

- View the facility with a "public eye."
    - » Look for scenes that may illustrate a vulnerable facility (e.g. dirty animal housing, signs of animal abuse, inattentive caretakers, animals with attached medical devices).
    - » Identify any situation that looks bad, even if it poses no threat to the research or to the health of the animals.
    - » Note cosmetic defects (e.g. peeling paint).
    - » Spot any situation that would yield an unflattering photograph.
    - » Recall any incident that has drawn the attention of local or national animal rights groups in the past.
    - » Bring someone along from outside the facility who can take a fresh look.
    - » Consider using an instant camera to help establish a frame of mind of looking for scenes that may provoke activists.
    - » List all research projects involving animals, including brief descriptions of what they are, the species used and the procedures involved.
- Assess animals for propaganda value or situations that could result in sensitive photographs (e.g. Class B animals, dogs, cats or primates).
- Identify your projects and published materials that are potentially controversial, including:
    - » Research in trauma, especially neurological
    - » Toxicology
    - » Substance abuse
    - » Mental health and brain function
    - » Burn studies
    - » Vision experiments, especially those that involve animals that are deprived of sight, either permanently or temporarily
    - » Studies that involve survival surgery
    - » Implants that are visible
    - » Basic research that is not directly related to a specific disease or human health problem
    - » Any project the IACUC has approved with exceptions to existing standards
    - » Identify research projects or individual scientists previously targeted
- Determine existing and/or pending citations, violations or investigations by any regulatory body.
- Review the facility for the history of all citations, major and minor (AAALAC, USDA, IACUC, FDA, EPA, Quality Assurance Unit).
- Record history of attention from animal rights groups.
- Assess the attitudes of your investigators and/or students.
    - » Do they take the animal rights movement seriously?
    - » Do they have a sense of their potential vulnerability as targets of animal rights activity?
    - » Do you have cavalier individuals who are not likely to follow institutional policy and instead strike out on their own?
    - » Assess the emotional climate of your institution.

» What percentage of your institution is made up of long-term employees who potentially are more loyal during a crisis situation?

» How do you assess the attitudes of temporary or seasonal employees?

» Catalog the experiences of other institutions and ask them about how they dealt successfully with a past situation or what they would do differently in the future.

- Meet with security from other organizations similar to yours to share information about animal rights activism. Most incidents are inside jobs. From the experiences of others, you can learn what tactics animal rights activists use, how breaches of security were accomplished and how crisis situations were prevented.

- Determine the audience(s) of the institution and how the crisis situation might affect them. Consider discussing your risks with them. These audiences may include:

  » Alumni, contributors, stockholders

  » Board of directors

  » Affiliate institutions

  » Students

  » Faculty/practitioners

  » Administration

  » Benefactors (corporate/individual)

  » Employees

  » Religious leaders

Evaluate Site Security

Because insufficient security is at the heart of many of the most devastating attacks by animal rights activists, it is recommended that you review your security measures carefully. If your own evaluation turns up areas of concern, consider whether minor adjustments will be sufficient to correct problems, or whether you need to significantly increase or revise your current security measures. Re-evaluate your security at regularly scheduled intervals. Consider the following:

- Who has access to your facility?

  » What is the total number of occupants and in what capacity are they there (faculty, staff, students, maintenance, contract workers, vendors, visitors, patients)?

  » Do you routinely run background checks on animal facility employee applicants? Most break-ins occur with help/direction from employees, particularly those with low-wage jobs and records of past activism.

- What facility area(s) does each person use or enter to perform his or her job?

- What are your high-security areas?

- Do you have animal quarters, drug laboratories, cash intake areas, gold distribution facilities or radioactive materials?

  » Are they centralized or distributed throughout the building?

  » Where are they located in relation to the loading docks, where food and supplies enter and where waste exits the building?

- Where are the researchers' offices in relation to the animal quarters?

- Do you allow delivery personnel into the animal facility?

- Do you post the names of your researchers and animal facility personnel in campus directories, employee lists, office bulletin boards and/or on your Web site?
- What is the construction and makeup of your facility?
    - » How many floors are there?
    - » Is there a single point of entrance?
    - » Is it bunker-style construction or open configuration, with many windows, grand stairs and landscape furnishings?
    - » Is there a loading dock or service entrance?
    - » How many exit stairwells are there?
    - » Does the facility contain asbestos in the ceiling, walls or doors?
    - » Is there a crawl space? How is it accessed?
    - » What power is available to the building? Is there an emergency generator?
- What sort of phone system is available within the facility? Are the phone lines and panels secure where they meet your building from the outside? Activists have tapped into phone lines in the past.
- Consider your facility from the arsonists' point of view.
- What security measures already are in place?
    - » Do you have security guards on staff or through contract services?
    - » Do you have a photo ID system for all individuals using the facility?
    - » How are visitor passes handled?
    - » What kind of controls do you have on facility keys? How many master keys are issued and to whom?
    - » Do you have a card access system for any, or all, doors in your facility?
    - » Do you have an electronic surveillance system?
    - » Do you have a security alarm system installed in all, or isolated areas, of your facility?
- Who is responsible for security in your facility?
    - » What is the reporting structure for the security and safety staff?
    - » Does upper management recognize and share concern for your facility's special security needs?
    - » Do all personnel know to report all incidents, no matter how minor, to facility security?
- What funds are (or might be) available to provide additional security measures?
- How does your facility coordinate with the local police authority?
- What are the local, state and federal security requirements for your facility?
- Review entrance and exit sites (e.g. outside stairwells, unlocked windows, doors, access from the roof).
- Who has access to the building during the night and weekends? Who monitors this?

Check Storage and Status of Data
- How is research data stored?
    - » Where are animal researchers' records kept?
    - » Where are copies kept?
    - » Secure videos, numeric and narrative data, including off-site copies.

- Review research protocols for confidential information.
- Review protocols for graphic and/or sensitive terminology.
- Investigate for what purposes you permit videotaping/photography at your facility.
    - » What are your procedures to control whether copies of videos are made, by whom and for what purposes?
    - » Do you allow staff to make videos for their own use?
    - » Where are videos kept at your facility (in individual laboratories or in a central video library)?
    - » What is your policy for the removal of videos from your facility?
- Look into the research protocols.
    - » Can they withstand public criticism?
    - » Who has access?
    - » Is there patent or trade protection?

Organize a Security Plan
- Consult with local police to establish procedures for arrests.
- Establish clear lines of authority and roles in crisis situations.
- Keep duplicate physical layout plans available off site (e.g. with local police or security).
- Share tactics and information about animal activism with security personnel from other research organizations. Many incidents are inside jobs.
- Evaluate how new hires are screened. Implement a review process to assure your personnel do not have hidden agendas.
- Develop a document that will provide pertinent information to the police in event of an incident.
- Have a layout of the facility (not blueprints) that shows the following:
    - » Phone exchanges
    - » Electrical boxes
    - » Water control
    - » Stairwells
    - » Controlled access areas
    - » Topography of roof (e.g. antennas, roof, hatch)
    - » Climate systems (e.g. heating/cooling)
    - » Emergency power (backup generators)
- Establish an institutional evacuation plan.
- Keep in a secure place a current roster and telephone numbers of employees with access to the animal care facilities.
- Keep keys to all areas (access is critical).
- Establish an ongoing training and reinforcement program, especially if your institution has frequent employee turnover.
- Do not allow delivery personnel in animal care facilities. Do not give them passkeys.
- Negotiate with local industry for temporary security agents for emergencies.
- Review your security procedures at regularly scheduled intervals.

- Provide management with an assessment of vulnerability and the steps being taken to prepare the organization for a potential crisis.
- Establish a chain of command to go into effect should a crisis occur.
- Organize a communication plan (phone tree) in the event of an incident during the day, after hours, weekends and holidays. See the phone tree worksheet on page 19 (*Creating Your Crisis Management Team Phone Tree*).

Risk Reduction: Employee Training

Many federal agencies require a variety of training sessions for employees within the veterinary animal laboratory division and within other research departments. To limit a manager's exposure to negligent supervision or negligent training, the following practical steps can be taken.

- Proper training/education by qualified supervisors and/or teachers is absolutely necessary before:
  - » Providing an employee with a dangerous tool or instrument
  - » Giving an employee the responsibility of securing the employer's premises
  - » Allowing an employee to give professional advice to third parties
- Conduct continual and periodic training with adequate follow-up (e.g. testing) to ensure the employee's skills are maintained and current.
- Confirm that employees who are required to be licensed or to possess an educational degree have earned such licenses or degrees from accredited/recognized institutions.
- Set forth the requirements and skills necessary to operate equipment in an employee handbook, training manual, company policy or the employee's job description.
- Document all training and educational programs, the contents of such programs and the identity of the employees who participated in the programs.
- Monitor employee work performance.
- Provide regular feedback to employees regarding their on-the-job performance.
- Document incidents of the employee's inability to perform his or her job properly and effectively, and take corrective action.
- Monitor the emotional state of employees. Contact NCABR (see the back cover for contact information) or the American Association for Laboratory Animal Science (aalas.org) for materials about ethics, emotions, compassion and sensitivity with regard to working with animals.

Risk Reduction: Proactive Media Preparation

It is important to build relationships with the media over time. A crisis is *not* the time to initiate a relationship. It *is* the time to contact those with whom you have cultivated a relationship, including TV, radio and print journalists and newspaper editors.

The public relations/affairs team acts as the liaison between the media and the spokesperson from each department. This team serves as an important resource for research spokespeople by briefing them about specific reporters, media program formats and institutional media relations policies.

Spokespeople should be trained to prepare appropriate responses to questions for both noncrisis and crisis situations *before* an incident occurs. See *Taking a Proactive Approach*, on page 49, for more information.

Worksheet: Creating Your Crisis Management Team Phone Tree

FACILITY SECURITY
1. Desk phone
2. Cell phone/pager

CHANCELLOR/CEO
1. Office phone
2. Cell phone

MEDIA COMMUNICATIONS
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

OFFICIAL SPOKESMAN/ SPOKESWOMAN
1. Name
2. Office phone
3. Cell phone

MEDIA CONTACTS
1. Names
2. Office phones
3. Cell phones

GOVERNMENT RELATIONS
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

LEGAL COUNSEL
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

RESEARCH ADMINISTRATOR(S)
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

NCABR
Suzanne Wilkison, President
919.785.1304 (office)
919.264.5272 (cell)

IACUC CHAIR
1. Name
2. Office phone
3. Cell phone

INVESTIGATORS
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

HEAD VETERINARIAN
1. Name
2. Office phone
3. Cell phone

ANIMAL FACILITY STAFF
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

DEANS/ DEPARTMENT HEADS
1. Name(s)
2. Office phone(s)
3. Cell phone(s)

LOCAL POLICE
Station phone

FBI
Office phone

ATF
Office phone