

This Annex Suggests General Considerations and Best Practices for Responding to a Criminal Incident at the Facility.

ARE YOU READY?

- *Who is authorized and trained to lead a response to criminal activity or chaos before local law enforcement personnel arrive at the facility?*
- *What deterrents can help to mitigate criminal activity?*
- *What type(s) of training will be most helpful for responding to criminal activity?*

Basic Steps When Writing and Implementing Criminal Incident Contingency Plans

1. **Conduct Preparation and Development**
2. **Draft Criminal Incident Section of the Contingency Plan**
3. **Train Personnel for Emergency Situations**
4. **Schedule Trainings and Subsequent Evaluations**

Each facility will need to determine what scale of criminal activity to address in the contingency plan and what to manage via daily operational procedures.

- *Theft: poaching and burglary of money, property or medication/drugs.*
- *Criminal animal activism: bioterrorism against animals, release or theft of animals, arson, vandalism and breaking and entering animal habitats during or after hours.*
- *Acts of violence: armed robbery, shooting, sexual assaults and hostage taking.*
- *Acts of terrorism: kidnappings, bomb scares and bombings, biological attacks, chemical attacks, intentional zoonotic disease contamination and explosions.*
- *White collar crime: theft, fraud, embezzlement, forgery and identity theft.*

A criminal incident can pose safety concerns—directly or indirectly—for personnel, visitors and animals. Protecting a facility against criminal incidents will vary depending on the size of the facility, and the nature and severity of the event. While it is impossible to plan for every criminal incident, certain elements will be universal.

Deterrents such as locked gates and security lighting can mitigate outside criminal activity while background checks can mitigate internal crime. Well-planned responses to situations and collaboration with local law enforcement can help diffuse a volatile state and potentially preserve respect and credibility for the institution.

1. Conduct Preparation and Development

Before drafting contingency plans for responding to a criminal incident, the Facility Contingency Planners (FCPs) and/or stakeholders need to identify the current state-of-readiness and general procedures for reacting to different types of criminal activity. The following pages offer a variety of options to consider while evaluating and developing this portion of the contingency plan, and training strategies.

- Assemble a planning team and collaborators linked with security and criminal activity (see page 3).
- Identify the potential risks. See *Risk Assessment Annex*.
- Identify and evaluate current plan(s), practices and protocols for averting an incident and safe responses to criminal activity at the facility.

2. Draft the Criminal Incident Section of the Contingency Plan

After evaluating the current standard operating procedures and backup plans (1) draft or edit the contingency plan to include actions to deter crime and safe responses to criminal activity, (2) monitor the progress of writing the plan and (3) develop a system for application of the plan. Best practice information for the following topics is provided beginning page 3.

- Deterrents and Security Preparedness*
- Best Practice Responses to a Criminal Incident*
- Best Practices for Reducing White Collar Crime*
- Monitor the Drafting and Implementation of the Criminal Incident Plan*

3. Develop Personnel Training for Responding to Criminal Incidents

- Develop the initial training program to respond to different types of criminal activity. See Training Considerations on page 8.
- Train personnel on procedures and **their specific roles** to respond to criminal activity.
- Conduct initial exercises and drills to implement procedures for how to respond, or not respond, to various types of criminal activity.

4. Schedule Training and Subsequent Evaluations

- Establish and schedule 'refresher' training exercises and emergency drills tailored to appropriate personnel.
- Schedule regular testing or evaluation of deterrents; and make appropriate modifications.
- Evaluate the success of the exercises and modify the training, as needed. If an emergency occurred, was training adequate?
- Revisit the plan as protocols for responding to criminal incidents are amended.

The following considerations are good business practices that may be helpful for developing Criminal Incident response plans. Plans will vary depending on the size of the facility, the number of personnel and other factors. Not every consideration is appropriate for all facilities.

Stakeholders and Experts to Consult on Criminal Incident Matters

Stakeholders can assist in understanding local, state, and federal laws, regulations and requirements, and in drafting a balanced and useful criminal incident plan. Meet with experts to discuss the best practices for maintaining a secure facility and appropriate responses to large and small incidents.

- Who are the potential stakeholders and external consultants?
 - Facility security detail (if applicable)
 - Local law enforcement
 - Security experts
 - Facility managers and owners
 - Human resources department
 - Veterinarians and animal caretakers
 - Biosecurity consultants
 - Legal counsel
 - Accountants and financial accountability consultants

Deterrents and Security Preparedness

A facility should be responsible for the safety of personnel, visitors and animals by providing a safe environment. There are steps that can be taken by any facility which may prevent some criminal acts before they happen, whether they employ on-grounds security, hire contracted security personnel or rely on local law enforcement to respond to criminal incidents. Understanding current operating procedures will be necessary to develop plans that deal with criminal incidents.

- Does the facility have deterrents that will help to mitigate criminal incidents? Are they checked regularly and kept in good working order? See *Facility Operations Annex.*
 - Perimeter fencing and locking gates
 - Secure door locks
 - Secure windows
 - Burglar bars
 - Security peepholes
 - Security lighting
 - Alarm systems
 - Security cameras
 - Video surveillance
 - 24-hour security system
 - Closed Circuit TV
 - Video door phone
 - Access control system
 - Securely stored firearms and ammunition
 - Securely stored drugs
 - Computer safeguards
 - Locking Cash register(s)
 - Safe or lock box
 - Locking file cabinets
 - Locking mail box(es)

Criminal Incident Annex

- Are keys, codes and/or passwords assigned to appropriate personnel? See Administration Annex.
- Are keys reclaimed and codes and/or passwords changed when employees and volunteers depart from their service?
- Does the facility utilize warning mechanisms to notify guests and personnel of an emergency situation? See Communications Annex.
- Does the facility maintain up-to-date contact information for immediate access to local law enforcement or higher authorities?
- Does the facility maintain a good working relationship with local law enforcement, and coordinate its planning with law enforcement?
- Does the facility provide tours and maps for local law enforcement? Maps with gridlines can speed response time of responders not personally familiar with the facility.
- Are local law enforcement officers involved in safety audits, including vulnerability assessments of the grounds, buildings and landscaping to identify potential weaknesses? Many departments will be happy to assist.

Special Considerations for Facilities that have Security Services

- Does the facility employ on-grounds Security Services or contracted security services? Are they uniformed and identifiable for guests?
- Do the Security Services personnel receive training or certification for the following?
 - Unarmed security officer certification
 - Armed certification
 - First aid
 - Cardiopulmonary Resuscitation (CPR)
 - Life guard or water rescue
 - Specific First Responder training
 - WISER system to assist first responders
 - Crowd control
 - Leading an evacuation
 - Decontamination procedures
 - Issuing an all clear
 - Alternate modes of communication
 - Filing an incident report
- Does the Security Services maintain inventories for security equipment and supplies such as stanchions, road barriers, yellow tape, and bull horns?
- Which safety procedures are performed by Security Services, and are they performed on a regular basis?
 - Check locked doors and building(s)
 - Secure the premises at closing
 - Monitor parking lot(s)
 - Monitor security cameras
 - Provide passes to restricted areas
 - Patrol of the facility
 - Other

Best Practice Responses to a Criminal Incident

Criminal incidents may vary from petty theft to a catastrophic incident. Each facility should determine the scale and scope of responses that its personnel or Security Services can reasonably be expected to handle. In some circumstances, an incident may be reported directly to local jurisdiction by the public via a 911 call made on a cell phone before Security Services can respond. Security Services may not be the first to know of a situation.

The type(s) of response(s) that can be handled safely by facility personnel will depend upon the types of training and certifications held, the type of incident and existing agreements with local law enforcement. Appropriate training must be provided to anyone expected to report or respond to a criminal incident. The safety of personnel, volunteers and guests is paramount.

- Are protocols for responding to an incident established and coordinated with appropriate law enforcement?
- Are all personnel well-informed on procedures for responding – or not responding – to the various types of criminal incidents?
- What types of information should be collected and recorded after each an incident? By whom?
 - Nature of the incident (theft of property, domestic incident, criminal act involving animals,)
 - Date and duration of the incident
 - Geographical boundaries/location (e.g., address, county, area)
 - Number of animals affected (if applicable)
 - Number of animals treated (if applicable)
 - Number of animal fatalities (if applicable)
 - Injuries of personnel, volunteers and visitors
 - Description of any compromised habitats and buildings
 - Other
- If a criminal activity occurs, what are the specific responsibilities of Security Services until law enforcement authorities arrive?
 - Determine if the criminal activity is violent or non-violent.
 - Notify law enforcement authorities, as appropriate.
 - Determine if an animal is involved and notify animal care personnel.
 - Activate crowd control procedures.
 - Contact off-duty animal keepers and veterinary personnel to return to the facility (such as occurs with incidents ‘after hours’).
 - Secure a crime scene.
 - Temporarily restrain or detain suspects, as appropriate or instructed.
 - Collect evidence, if instructed.
 - Order an evacuation, or execute shelter-in-place plans, if necessary.
 - Provide first aid or set up triage areas (for humans).
 - Other
- Does the facility have a MAA with a Critical Incident Stress Management (CISM) team as a resource to support personnel after a traumatic event? See [MOU/MAA Annex](#).

- Are ethical practices taken at all levels to ensure that victims and witnesses to crime are aware of their right to report criminal acts to the authorities without retaliation?

Special Considerations for Terrorism

Terrorism can be described as a criminal act of violence, or the threat of violence designed to intimidate or cause fear. Generally, acts of terrorism, such as the 1995 Oklahoma Federal Building bombing and the World Trade Center attacks of 1993 and 2001, target high profile locations for maximum physical and psychological impact, high loss of life and large scale infrastructure damage. A facility classified as a large public venue may represent an attractive target to a terrorist. The following are highly suggested.

- During the Risk Assessment process, discuss with law enforcement and other stakeholders the likelihood of a terrorist attack, the facility's vulnerability to terrorism and the potential consequence(s).
- Train all personnel to recognize and report suspicious behavior to mitigate an event before it occurs (see below in Training Considerations).
- Maintain appropriate facility readiness (as discussed above in *Deterrents and Security Preparedness*), which can mitigate a potential attack.
- When developing plans, identify buildings that could serve to shelter individuals for both short- and long-term events. See the *Facility Operations Annex* for information on selecting the best-suited structures for shelter in the event of a 'dirty bomb' or other nuclear incidents.
- While many elements of the Contingency Plan would be implemented for a terrorist attack, a comprehensive and effective communication strategy will be the most crucial. See *Communications Annex*.

Best Practices for Reducing White Collar Crime

White collar crime can happen anywhere. Employee theft is the most common, but other crimes, such as those listed below, also occur. White collar crime can create a severe financial situation that over time could result in catastrophic financial collapse of the facility. Policies and administrative controls can be helpful in preventing white collar crime.

Facilities may choose to reduce white collar crime through financial management policies, human resources policies and standard operating procedures rather than in the Contingency Plan.

Criminal Incident Annex

- Embezzlement: (always a concern in any operation with high cash intake and high operating budget) dishonestly appropriating assets that have been entrusted.
 - Investment fraud: facilities with substantial endowments that are invested should have clear and robust policies with checks and balances to avoid such activity.
 - Burglary or robbery: Theft of funds or property.
 - Data theft: electronic and paper document stealing.
 - Employee theft: unauthorized taking of equipment and supplies from facility.
- Do human resources personnel screen employees and volunteers during the hiring process? Which of the following are performed? (Note: The facility should have a policy regarding criminal history in order to act consistently on the hiring prerequisites.)
- | | |
|--|---|
| <input type="checkbox"/> Reference check | <input type="checkbox"/> Credit report |
| <input type="checkbox"/> Prior employment verification | <input type="checkbox"/> Social Security verification |
| <input type="checkbox"/> Drug screening | <input type="checkbox"/> Criminal background check |
| <input type="checkbox"/> Education verification | |
| <input type="checkbox"/> Driving Record (if driving facility vehicles are part of the job description) | |
- Are rigorous interviews performed during the hiring process?
- Is a fair wage paid for the job performance and is the work environment pleasant?
- Is there a separation of duties so that a single person is not responsible for both recording and processing a transaction, which provides a 'check and balance'?
- Is access to physical and financial assets and information, and accounting systems, restricted to authorized personnel and is mail handled securely?
- Do all personnel use time clocks?
- Are personnel provided with a secure place to store personal belongings?
- Does the facility retain the right to inspect desks, lockers and other facility property?
- Are all personnel informed of the security measures that are in place?
- Are policies for responding to employee theft written, clear, consistent and comprehensive?
- For any retail operations, are monetary safeguards such as cash registers and security cameras or video surveillance installed to deter criminal activity?
- Are sales transactions reconciled?
- Are old bills and documents with personal information shredded? See Data Management Annex.
- Are passwords kept private and difficult to guess? Are they changed frequently?
- Are computer networks strongly protected and appropriate staff trained for detecting social engineering attempts to gain network passwords?

Monitor the Drafting and Implementation of the Criminal Incident Plan

FCPs should monitor the progress of (1) the plan development; (2) drafting the plan and (3) developing a system for application of the plan.

- Who will be responsible for collaborating with the appropriate law enforcement agencies?
- Who will review or update the facility's signed MOUs or MAAs? See Administration Annex.
- What is the timeframe for developing and writing these elements of the contingency plan?
- Are new equipment and supplies needed to implement the plan?
- Who will identify/adapt, develop, and monitor the training program?
- Where will the contingency plan be located?

Training Considerations when planning for Criminal Incidents

Training and full-scale practice drills increase the likelihood of a successful and safe outcome from a criminal incident. Training exercises clarify roles and responsibilities and reduce potential risks. The following considerations relate specifically to criminal incidents. The types of training will be determined by the facility's capacity to respond and its recommended responses to an incident. See the Training Annex for general training guidance.

- All personnel** should be trained to perform their expected roles in a criminal incident.
 - Recognition of unusual circumstances.
 - Conspicuous behavior (e.g., demonstrators, out-of-place behavior)
 - Suspicious activity
 - Criminal activity
 - Unethical behavior
 - Particular interest in unusual things (i.e., unusual objects being photographed such as power houses, electrical panels, steam tunnels/grates, fuel storage, etc.)
 - Unattended packages
 - Unusual or suspicious mail
 - Report emergency codes to Security Services or management, if applicable.
 - Report the different types of criminal incidents to appropriate authorities.
 - Procedure(s) for how and to whom a criminal incident is reported.
 - Any specific responsibilities in addition to reporting such as directing visitors out of harm's way.
- If a facility has **Security Services**, best practice training considerations may include:
 - Training with local law enforcement to understand roles and responsibilities of each group.
 - Recognition of criminal and/or terrorism indicators and warnings.
 - How to report an incident and to whom.
 - How to secure a crime scene.
 - How to temporarily restrain or detain suspects, as appropriate.
 - How to contact off-duty animal keepers and veterinarian personnel to return to the facility.
 - Proper response procedures for specific criminal activities.
 - How to order an evacuation or move people into a safe building to shelter-in-place.
 - How to perform first aid and CPR.

- How to issue an all clear.
- How to file a criminal incident report.
- Proper chain(s) of custody handling for evidence.
- Additional Security Services training and certifications may include:
 - Unarmed Security Guard
 - Armed Security Guard and firearms team training for animal escape
 - Cardiopulmonary resuscitation (CPR) including automatic defibrillator training
 - Life guard or water rescue
 - First Responder
 - Crowd control
 - Photography
 - Setting up an area for triage (injury evaluation) or assisting in triage in-place actions.
- Professional development considerations for **human resources personnel** include:
 - Human Resources Management Certification including screening and interviewing employment applicants, and performing background checks.
- Special training considerations for **appropriate personnel** include:
 - Recognition of and proper handling for suspicious mail and packages. (See <http://www.fema.gov/pdf/areyouready/terrorism.pdf>.)
 - Recognition of dangerous chemical agents. (See Centers for Disease Control and Prevention and U.S. Department of Transportation (DOT).)

Sample Table-top Drills

Responses to emergency scenarios during a table-top exercise may vary depending upon the location of the incident, time of day or night and the animals that might be involved. Develop and personalize multiple scenarios for discussions that reflect the facility and its environment, based on the Facility Risk Assessment. These could then be modified for drills and exercises. The following are sample criminal incidents scenarios.

- ❖ **Robbery**: Two armed people rob the gift store of cash and flee.
 - What are the priorities and responsibilities of: management, security detail, store personnel, information officer, animal care personnel, office and grounds personnel, volunteers and any other personnel not involved?
- ❖ **Malicious vandalism**: A small fire was set just inside the building hosting IT equipment and servers, setting off the alarm system. By the time the fire department arrives, the fire has been extinguished by the sprinkler system and the building has been evacuated. Employees and visitors want to know what has happened, as does the media. Meanwhile, the sprinklers in the data center caused the facility's e-mail and Web servers to stop working.
 - What are the priorities and responsibilities of: management, security detail, IT personnel, information officer, animal care personnel, facilities, data management, office and grounds personnel, any other personnel and volunteers not directly involved?
- ❖ **Violence**: A former spouse of an employee appears armed with a handgun and demands to see the employee. The armed person threatens to harm people and animals if the demand is not met.

Criminal Incident Annex

- What are the priorities and responsibilities of: management, security detail, information officer, animal care personnel, facility operations, office and grounds personnel, any other personnel and volunteers not directly involved?
- ❖ **Biological agents:** An employee discovers a box sitting on a bench at an indoor exhibit with a handwritten warning that it contains anthrax during a busy time of the day.
 - What are the priorities and responsibilities of: management, security detail, information officer, animal care personnel, facility operations, office and grounds personnel, any other personnel and volunteers not directly involved?

Schedule Training and Subsequent Evaluations of the Plan

- Schedule facility-wide training for all personnel on how to respond to a criminal incident.
- Adapt the new-hire orientation program to include the criminal incident contingency plan training for all personnel.
- Determine the frequency and schedule a long-term training program for security personnel on responses to criminal incidents. Include table-top drills and single exercises on various elements of the procedures and full-scale exercises.
- After training exercises, or an actual incident, meet with personnel and local law enforcement personnel to evaluate the plan's effectiveness or gaps revealed; modify the Criminal Incident Plan and training, as necessary.

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