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# Crisis Communications Planning

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THE COMPANY

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# Executive Summary

**Objective:** To effectively manage communications through a formal, clearly defined process intended to mitigate repercussions in the event of a crisis. Maintain a reputation of leadership and transparency on vital issues and breaking news that impacts the company. The ultimate desired outcome is ensuring that internal and external constituents receive factual information and messages that are honest and the most beneficial to the organization.

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A Corporate Crisis Communications plan strives to provide internal stakeholders with guidelines to address internal and external concerns about events and activities that have the potential to negatively impact the business. This plan discusses the activities and processes used in identifying and responding to potential or actual crises.

The key areas covered in this plan include:

- Identifying a crisis. When is an event a crisis?
- Gathering all relevant information necessary to determine the level of response required
- Communicating to internal and external constituencies
- Providing a basis for continued improvement through measured, post-event analysis of the company's response and external reaction

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# How to Use this Plan

The purpose of any crisis plan is to prepare for any event—whether anticipated or not—that may adversely impact the business. This includes crises that do not directly affect day-to-day business immediately, but which may impact public opinion in the long term. This plan offers prescriptive steps for gathering and reporting information that will ultimately be used to determine the level and type of response by Global Communications.

Who should use this document and how it should be used:

**Regional GMs and Managers** – Use the templates contained here to gather information about the event and determine what kind of initial response to provide (if any) pending additional guidance from the Crisis Communications Team.

**Internal Department Heads (HR, Finance, IT, Facilities)** – Department heads can use the templates contained in this plan to gather information for submitting to the Crisis Communications team. Additional responsibilities may include: approvals of internal communications, acting as point-of-contact (POC) with external resources and agencies, and data/document preservation.

**Field Marketing** – Marketing managers in the field should use this manual as a guide for understanding their role in a crisis and for bringing an issue to the attention of the appropriate person(s) as quickly as possible.

**Communications Team** - Use this plan as an actionable process for gathering and analyzing the events related to a potential crisis. Should it be determined that the event is a crisis, the Communications team will:

- Initiate the steps detailed here to inform executive management of the nature of the crisis, any potential outcomes, and to drive consensus on how the company will respond.
- Prepare necessary statements/documents reflecting the appropriate messaging and positioning.
- Plan and execute the appropriate dissemination strategy to inform and communicate to internal and external stakeholders the details of the event as we know them.
- Provide [Company X] written response or verbal statement to the designated spokesperson.

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# Definition of a Crisis

A crisis is any unexpected event that occurs, which may adversely impact the company, its customers, investors, or partners (monetary, physical, human capital, etc.)

A crisis can arise from internal or external sources and usually involve elements over which we have no control. A consistent message from the company in response to the crisis is key to achieving the best possible outcomes for all stakeholders.

## Examples of Crisis

- **Natural disasters** – a disaster (e.g., earthquake, tornado, fire, etc.) can impact one or more office locations and cause displacement and confusion among employees.
- **Acts of terrorism** – either against [Company X] locations or offices or against others in connection with the use of [Company X] name.
- **Person-to-person physical harm** – where physical harm is inflicted on another person (employee or otherwise) by a [Company X] employee, or directed at [Company X] employees.
- **Disablement or accidental death of key personnel** – in the case of death or serious injury to a high-level [Company X] executive.
- **Physical harm inflicted by [Company X] products** – should a defect occur that causes physical harm to a person (e.g., products catching on fire/exploding).
- **Corporate/internal security breach** – any security breach involving [Company X] properties or payment gateway, which results in the theft of personal information of employees, partners, and/or customers.
- **End-user/external security breach** – end-user breaches that take advantage of flaws in product design (hardware or software).
- **Credible allegations of misconduct by C-level executives.**
- **Criminal conduct or inappropriate behavior by employees working in an official capacity.**
- **Improper public statements by [Company X] spokesperson** – any public statement made by a [Company X] employee (by approval or otherwise) adversely affecting [Company X] image.

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# Role of Communications in a Crisis

Corporate Communications play a critical role in crisis management. Situations such as legal disputes, theft, accidents, fire, flood, or manmade disasters that can in some way be attributed to actions (or failure to act) by [Company X] or its employees can generate adverse or negative attention. Crisis Communications is focused on managing the communications effort to ensure that [Company X] communicates to stakeholders clearly and consistently with factual and honest messages and statements calibrated to the potential impact of the particular crisis at hand. In the era of social media, incorrect or misleading information can quickly go viral and often dwarf, or even lead, traditional media coverage.

Compared to other groups within the company that have specific actionable tasks in response to a crisis, Corporate Communications' role is threefold:

1. Organizing activities around the gathering and relaying of information.
2. Determining the potential negative impacts and advising on whether to and how to respond.
3. Communicating the company's views in a manner designed to manage or mitigate potential adverse impacts.

Specific activities the Global Communications team is responsible for include:

- Providing guidelines and awareness (via this plan and related activities) designed to ensure stakeholders understand how to respond to potential adverse events and activities.
- Researching and gathering information about a potential crisis. This includes not only what is being reported by news outlets, bloggers, etc., but also working with employees, when possible, to understand the series of events leading up to the crisis, and what the response has been, if any, from employees and the public.
- Acting as a catalyst to ensure the company evaluates potential crises and initiates response plans as needed.
- Ensuring key stakeholders are aware of a potential crisis and the options available for containing possible adverse impacts.
- Ascertaining the potential impact of a situation for each defined constituency (e.g., employees, partners, media), advising on how they may react to a particular situation and on the appropriate messaging and positioning, and determining the best channel(s) to communicate the company's response both during and after the crisis.



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- Fielding inquiries from internal and external sources and responding appropriately by managing the distribution of critical, often sensitive information to the media, employees, external stakeholders, and the general public.
  - Driving a culture of transparency and preparation.

After the initial response, the Communication team will continue to monitor the situation and advise on additional messaging or other activities as needed. Any response beyond that required by a company spokesperson (e.g., meeting with partners or customers) will be coordinated by the Regional General Manager or the POC designated for that particular situation.

## Tone

In many instances, how information is communicated is as important as what is officially communicated. Different crisis scenarios require special attention to the overall tone and varying levels of detail that must be calibrated to the situation at hand. The values that drive [Company X] behaviors, responses, and official statements include:

- Transparency
- Urgency
- Sympathy
- Concern
- Known Facts

**Transparency** - At all times, we should strive to be open and honest about the crisis and our response, as applicable by state and/or federal laws. There may be times when we are required by authorities to temporarily withhold information, and in those instances, we want to present ourselves as sympathetic to the situation, but also respectful of the law and those working with us to remediate the crisis.

**Urgency** - Regardless of the situation, [Company X's] demeanor should reflect a sense of urgency to gather and communicate all relevant information about the event.

**Sympathy** - Each crisis affects people in some way. Our response should always reflect concern and empathy towards the situation and its effects on different audiences (professional and personal).

**Concern** - Even before a situation becomes a crisis, our response should reflect concern. In some instances, a concerned, initial response to a situation may prevent it from becoming a crisis.

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**Known Facts** - In communicating the details of a situation, we should only communicate known facts and not attempt to extrapolate or speculate based on unproven data. Doing so could potentially cause unnecessary anguish to others or put [Company X] in a situation of having to step-back information at a later date once more details have been verified. If you are not confident about a particular detail, it is best to simply say that we are still investigating the situation and will provide more information as it becomes available.

## Crisis Constituents

In a crisis, the company has a responsibility to respond in an accurate, meaningful, and transparent way to all constituents, both internal and external. The message to all constituents should remain consistent with the assumption that anything communicated internally will also be communicated externally either by accident or by design. However, the tone used to communicate with the two groups may differ depending on the type of crisis faced.

### Internal constituents include:

- **Board of Directors and C-level executives:** Regardless of the crisis, all C-level employees—and the Board of Directors if so determined by the CEO/CFO—should be notified and apprised of the details of the crisis and the company’s response plans. C-level executives across the corporate landscape may be targeted by the media for a statement. C-level executives directly involved should be prepared with an approved statement drafted by the Communications team and approved by the CEO to engage and inform the media of any potential risk.
- **Management:** Media often view non-Executive-level employees as an easier target for non-official information. All managers must be aware that unless they have been specifically authorized to comment with media on a specific topic, they are to defer questions to the established company communications point of contact. Unless a manager or group of managers is particularly involved in the crisis, no additional communication is necessary beyond what is communicated to them by their direct managers.
- **Communications team:** The director of corporate communications provides an initial assessment of communications issues and determines which members of the communications team should be assembled to respond to the situation at hand. Once communications strategy and tactics are set, all communications team members will be advised whether to and how to respond to inquiries.

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- **Employees:** Unless specifically authorized to engage with the media or customers, all employees are required to refer inquiries to the established communications POC. In times of crisis, a general communication may be sent to all employees, or the affected group, providing relevant details and instructions for responding to questions.
  - **External contractors, agencies, or contracted businesses:** Except in specific instances where a contractor or contracted business or agency is directly involved in the crisis, no additional communication to this constituent group is necessary. In those cases of direct involvement, the Communications team will work with the involved contracted agency to ensure [Company X's] goals and objectives are defined and acted upon.

**External constituents include:**

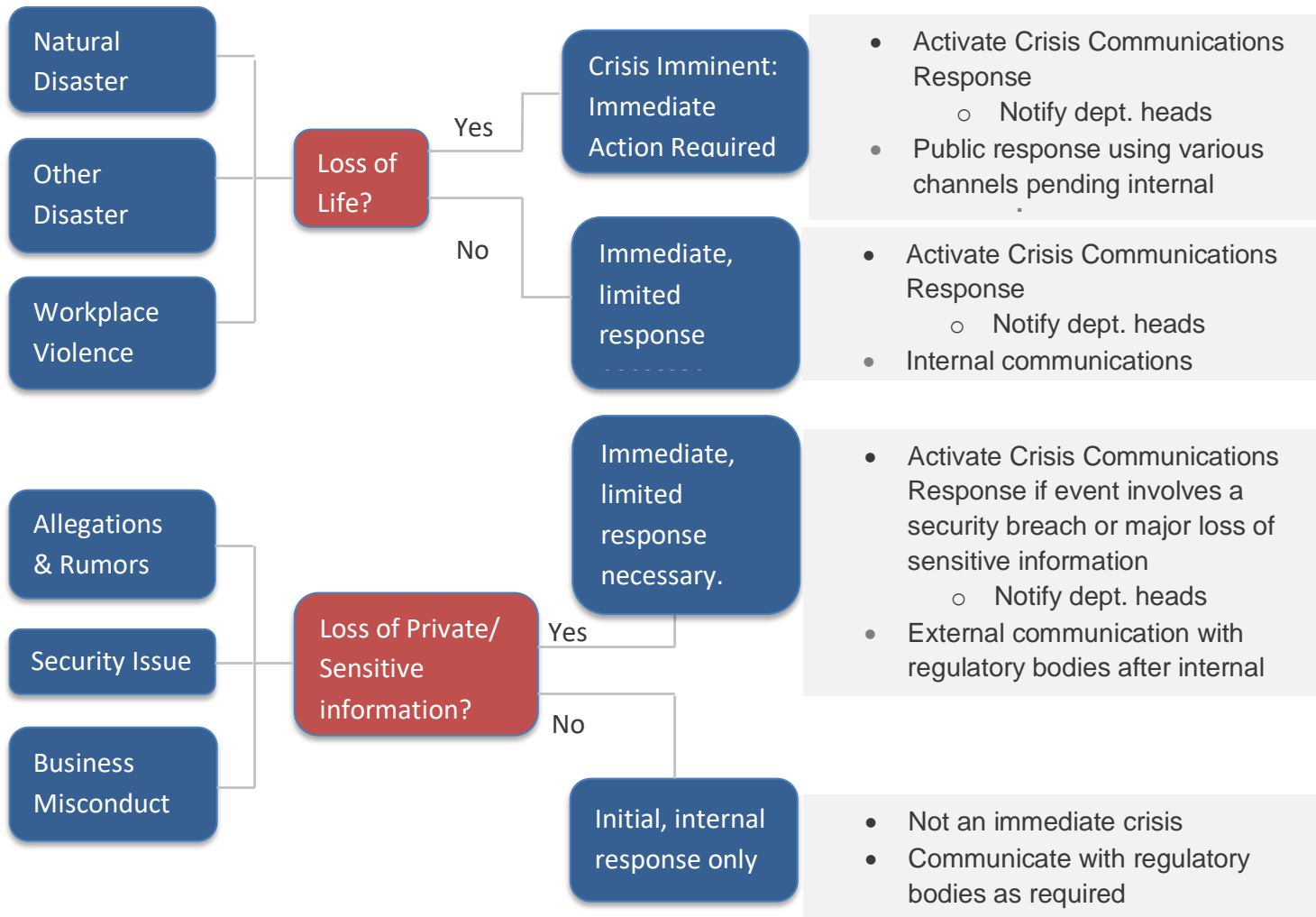
- **Affected employees' families:** In cases where company employees are involved in a crisis that involves violence against them, the Communications team will work with internal groups (i.e., HR) to communicate the details of the crisis and the company's response to the employees' family.
- **Partners:** Crisis impacting the company's business health may also impact partners. Communication with partners should include information regarding the issue and steps the company is taking to resolve them.
- **Customers:** When a crisis impacts the company in such a way that it affects the company's performance, reputation, or business commitments, we have a responsibility to communicate our efforts to remediate the crisis with our customers. In some instances, that may be in the form of a "push" or proactive communication, or we may choose to respond on a case-by-case basis.
- **Investors:** While Investors are always top-of-mind, the method of communication with the investor community must be viewed the same as communication with the general public. No communication can be made to a set, or subset of the general public, without the involvement and approval of the Global Communications team.
- **Mainstream media:** Media outlets should be viewed as a way to help deliver the company stance, views, and activities regarding the crisis to the general public, and other constituents. The Communications team is responsible for directly responding to and/or contacting identified media outlets to relay the company statement.
- **Online media:** The definition of media has expanded broadly in the Internet age to include a variety of "bloggers" and news "aggregators" who link to, abstract, and/or analyze published or online reports, often without attempting to verify the information. As such, inaccurate information can quickly spread virally without regard to the actual situation. It is critical to recognize situations like this early, gather the facts and determine how to respond.



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- **Social media:** With the advent of social media, the public can spread information about a crisis far more quickly than through traditional print and broadcast media. Therefore, social media communication in a crisis should be an important part of the overall crisis plan, but any communication of new or unverified information should come from the Communications team.
  - **General public:** Members of the general public are bombarded by various media sources (print, broadcast, online, social) and are the ultimate consumers of those sources.

# Crisis Determination Checklist

Determining whether or not an event is a crisis or simply a problem, is not always black and white. Depending on the type of event and the potential for sensationalism, varying levels of response may be required. Use the following decision tree to help determine whether a situation is a crisis and how quickly we may need to respond.



# Incident Severity

In the event of a situation warranting immediate attention, the use of the previous **Crisis Determination Checklist**, which will help determine whether or not an incident justifies activating the Crisis Communication process, should be used with the following **Incident Severity** guide to determine how best to respond.

In cases where the situation does not require activation of the Crisis plan, you can still find guidance below on how best to respond in the guide below.

Low Level	Recommended Response
<b>Rumors: false and/or damaging information being circulated about your organization</b>	Time-sensitive. Depending on the situation, may call for direct communication with affected customers/partners rather than in a public forum. Approval at the regional GM level is required.
<b>Challenges: stakeholder claim the organization is operating in an inappropriate manner</b>	Time-sensitive. Depending on the situation, public discourse may not be necessary. External communication subject to internal review by Global Communications and Legal Counsel.
<b>Product tampering/malevolence: external agent causes damage to the organization</b>	Time-sensitive, but should allow for a complete review of the problem. Depending on the issue, there may be limitations on the release of information externally. Approval is required by the office of the CSO.
<b>Technical error product harm: equipment or technology failure that causes a product to be defective or potentially harmful</b>	Not time-sensitive. Barring a visible event resulting from the failure, communication would be limited to 1:1 responses as needed. Approval required by Legal Counsel pending investigation by R&D.
Moderate Level	Recommended Response
<b>Natural disasters: acts of nature such as tornadoes or earthquakes that affect [Company X] employees</b>	Time-sensitive. A sympathetic response via social media is acceptable in most cases and does not require high-level approval.
<b>Technical error accidents: Small-scale equipment or technology failure that causes an accident</b>	Time-sensitive. Communication reach is driven by the scale of the event. Initial response stating facts may be required, but no further clarification

	until facts are determined. Approval required by Legal Counsel pending investigation by R&D.
<b>Internal security incident involving the release of (or rumor of) confidential employee information.</b>	Time-sensitive. Unless customer information is involved, no industry regulations requiring notification. Internal communication is limited to those specifically involved. Requires approval of Legal Counsel, Office of the CSO and other department heads as necessary.
<b>Organizational misdeed: management actions that put stakeholders at risk and/or violate the law</b>	Time-sensitive. Specific communications required by law. Confer with internal legal on proper channels/timing. Approvals required by Legal Counsel and the CEO.
<b>High Level</b>	<b>Recommended Response</b>
<b>Workplace violence: attack by former or current employee or current employee on-site</b>	Time-sensitive—driven by media coverage. The response should be public and sympathetic, without speculation on motive or intent. Approval required by Legal Counsel and head of HR.
<b>Human-error accidents: Moderate to large industrial accident caused by human error</b>	Time-sensitive. Likely to affect employees/[Company X] property. If the event is public and fairly large, recommend Immediate, sympathetic comment. If the event is isolated or damage is minimal, little to no external communication may be necessary. Approvals required by regional GMs and dept. heads (Legal Counsel and HR) required.
<b>External security incident involving one or more payment gateways and which includes the loss of private customer data.</b>	Time-sensitive. Communication required to industry organization(s) (e.g., PCI) and directly to affected customers. Will likely become public within a matter of days or weeks. The response should assume responsibility and work to assure the public we are taking steps to remediate. Approvals are required by GMs, Legal Counsel, and the office of the CSO.

Adapted from: <http://www.instituteforpr.org/topics/crisis-management-and-communications/>

# Activating the Plan

Actual and potential crises can occur anywhere in the world, either identified by the Communications team as a result of external media or identified within the business by a person or team who is then responsible for engaging the Communications team as a partner in managing the response process. The following activation plan should be employed as soon as events can be confirmed:

Step	Action	Complete
1.	<p>Awareness around an incident is raised and details of the event are gathered using the <a href="#">Fact Check Worksheets</a> and sent to the Crisis Communications POC. Contact channels to follow in order of availability:</p> <p>Email: <a href="mailto:i_pr_internal@[Company X].com">i_pr_internal@[Company X].com</a> Telephone:</p> <p>Level 1: PR Director (xxx.xxx.xxxx) Level 2: Agency of record (xxx.xxx.xxxx) Level 3: VP Global Marketing (xxx.xxx.xxxx)</p> <p>If no response is received within 60 minutes of initial outreach, contact the next level until contact is made.</p>	
2.	<p>Crisis Communications Team performs initial information gathering using the “<a href="#">Crisis Determination Checklist</a>” via traditional and online media, and social media. Results sent to <a href="mailto:i_publicrelations@[Company X].com">i_publicrelations@[Company X].com</a></p>	
3.	<p>If it is determined that a crisis is ongoing or imminent, the Crisis plan is activated and notifications are sent to internal constituents in the following order:</p> <ul style="list-style-type: none"><li>• VP Marketing</li><li>• SVP Legal and/or CSO (as needed)</li><li>• CEO</li></ul> <p>Once initial internal communications have been made, additional communications may be developed to address other internal stakeholders.</p>	

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# Gathering and Communicating Event Details

It is important that all relevant details are gathered and communicated accurately throughout an event or crisis. The initial details of an event may have been gathered via informal conversation with someone directly or indirectly involved, so even information from trusted sources should be corroborated before accepted as fact. Once the initial information has been captured, using the guidelines provided in the Fact Check Worksheets, a sweep of social media and online media may help clarify the details, or provide additional information such as what information or misinformation has already been disseminated.



Information sourced online should be viewed with a level of skepticism until the facts can be verified.

## Communicating Confidential Company Information

While gathering information about a crisis involving suspected misuse or employee misconduct, any conversations with involved parties, their managers, or others directly involved, should be carried out with the company's in-house legal representation present. In circumstances where the employee believed he or she acted in the lawful and best interests of the company, legal representation can help protect the divulged information under attorney-client privilege. However, the attorney-client privilege does not protect information divulged to corporate legal if the activities were unlawful or malicious intent was involved.

Any further communication of information gathered under attorney-client privilege should **ONLY** be communicated by telephone or on the approved corporate email system and should contain the disclaimer:

***"CONFIDENTIAL: PRIVILEGED ATTORNEY-CLIENT COMMUNICATION"***



Any information you wish protected under the "Attorney-Client" privilege must also be sent to in-house legal counsel when you send the original communications. Simply including the above confidentiality statement does not provide adequate legal protections.

Failure to correctly communicate confidential information could result in that information being determined as "not confidential" information during the e-discovery phase of any resulting investigation.



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# Project Code Naming

Code names can be used as a way of decoupling the actual event from discussions around it for privacy reasons and code names help ensure that communications regarding a particular incident are attributed to the correct incident and not another that may be similar in topic or that may involve the same geographical area.

The Crisis Communications Team leader will determine when a code name is appropriate and will designate the code name, which should then be used in all electronic communication until the incident is resolved.

Until an incident can be fully reviewed and processed, all initial communication should:

1. Use the same reference in all email communication. Avoid using subject lines that are off-topic or that don't bear a direct relationship to the incident.
2. If the incident occurs in a specific region, city, state, or other geographic location, use that location as the subject (e.g., "Portugal: Malware")

Once the incident has been reviewed and a code-name created (if necessary), use only that name when referencing the issue in either voice or print communications.

END OF SAMPLE