

## **OSHA Issues Crowd-Control Guidelines for Protecting Workers at Sales Events**

**November 19, 2009**

### **Introduction**

The Occupational Safety and Health Administration (OSHA) published a fact sheet on November 17 providing crowd-control guidelines for retailers to protect workers during major sales events, like Black Friday. While compliance with the OSHA crowd-control recommendations is not mandatory, retailers need to be aware that OSHA will likely use this guidance—and OSHA’s “general duty” clause requiring employers to provide every employee with a place of employment that is free from recognized hazards—to cite employers for future violations.

OSHA’s guidance—covering planning, pre-event setup, the actual event, and emergency situations—attempts to ensure that retailers are prepared well to protect employees during large sales.

### ***Planning Phase***

OSHA recommends that retailers consider the following options when planning a large sales event:

- Where large numbers of people are expected, have trained security, crowd-management personnel, or police officers on site.
- Create a detailed staffing plan that designates a location for each employee. Based on the size of the crowd expected, determine the number of employees that are needed in various locations to ensure the safety of the event (e.g., near the door entrance and throughout the store).
- Ensure that employees are properly trained to manage the event.
- Contact local fire and police agencies to determine that the event site meets all public safety requirements, and to ensure that all permits and licenses are obtained and that local emergency services, including the local police, fire department, and hospital, are aware of the event.
- Designate an employee to contact local emergency responders, if necessary.
- Provide legible and visible signs that describe entrance locations, store opening times, and other important information such as the location of major sale items.
- Prepare an emergency plan that addresses potential dangers facing employees, including overcrowding, crowd crushing, being struck by the crowd, violent acts, and fire. Share the emergency plan with all local public safety agencies.
- Train employees in crowd-control procedures and the emergency plan.

- Provide employees with an opportunity to practice the special event plan. Include local public safety agencies if appropriate.

### ***Pre-Event Setup Phase***

OSHA recommends that retailers consider the following options when setting up for the event:

- Set up barricades or rope lines for crowd control well in advance of customers arriving at the store.
- Make sure that barricades are set up so that the customer line does not start right at the entrance to the store. This will allow for orderly crowd control during entry and make it possible to divide crowds into smaller groups for the purpose of controlling entrance.
- Ensure that barricade lines have an adequate number of breaks and turns at regular intervals to reduce the risk of customers pushing from the rear and possibly crushing others, including employees.
- Designate employees to explain approach and entrance procedures to the arriving public, and direct customers to lines or entrances.
- Make sure outside personnel have radios or some other way to communicate with personnel inside the store and with emergency responders.
- Consider using mechanisms such as numbered wristbands or tickets to provide the earlier-arriving customers with first access to sale items.
- Consider using an Internet lottery for “hot” items.
- Position shopping carts and other potential obstacles or projectiles inside the store and place them away from the entrance, not in the parking lot.
- If appropriate, provide public amenities including toilets, washbasins, water, and shelter.
- Communicate updated information to customers waiting in line. Distribute pamphlets showing the location of entrances, exits, and special sales items within the store. Shortly before opening, remind those customers waiting to enter about the entrance process (limiting entry to small groups, redemption of numbered tickets, etc.).

### ***During the Sales Event***

OSHA recommends that retailers consider the following options during the sales event:

- Make sure all employees and crowd-control personnel are aware that the doors are about to open.
- Staff entrances with uniformed guards, police, or other authority personnel.
- Use a public address system or bullhorns to manage the entering crowd and to communicate information or problems.
- Position security or crowd-control managers to the sides of the entering (or exiting) public, not in the center of the crowd’s path.
- Provide crowd- and entry-control measures at all entrances, including those not being used. If possible, use more than one entrance.
- When the store reaches maximum occupancy, do not allow additional customers to enter until the occupancy level drops.

- Provide a safe entrance for people with disabilities.

### ***Emergency Situations***

OSHA recommends that retailers consider the following to deal with an emergency situation:

- Do not restrict egress, and do not block or lock exit doors.
- Know in advance whom to call for emergency medical assistance.
- Keep first-aid kits and Automated External Defibrillators (AEDs) available, and have personnel trained in using AEDs and CPR on site.
- Instruct employees, in the event of an emergency, to follow instructions from first responders, regardless of company rules.

### **Conclusion**

While OSHA’s guidance is nonbinding, retailers are well advised to send a strong safety message to all retail locations for Black Friday and other large sales events. Specifically, employers should consider whether to communicate OSHA’s recommendations to all retail locations and to instruct local affiliates to use those recommendations to develop a store-by-store strategy to ensure the safety of all employees.

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