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The Gap Between Policy and Reality

Why Plans Alone Don't Protect People—And What Leaders Must Do Instead

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Executive Summary

Workplace violence and active threats are on the rise, and preparedness has become a core leadership responsibility. Not because every organization will experience an incident, but because the consequences of being unprepared are no longer acceptable.

Organizations exist to serve people: Employees, customers and communities. While risk extends beyond the physical boundaries of any workplace, the responsibility for preparedness does not. Ensuring that people know how to respond under stress clearly, calmly, and decisively, rests with organizational leadership.

Safety and security are foundational human needs. When preparedness is treated as a procedural requirement rather than an operational system, gaps emerge between policy and reality. Those gaps create uncertainty, hesitation, and avoidable harm, not only to individuals, but to trust, continuity, and performance.

This paper examines why fragmented approaches fall short and why leadership must move beyond awareness and compliance toward human readiness: the ability of people to recognize risk, make decisions, and respond effectively when something unexpected occurs.

This paper makes a clear case that:

- Awareness alone does not prevent harm.
- Plans alone do not prevent harm.
- Training alone does not prevent harm.

A system that integrates site-specific threat assessments, emergency action planning, education and continuous improvement, builds a true culture of safety.

Training that avoids fear-based shock tactics and instead builds capability, clarity, and confidence is training that delivers a stronger outcome when needed.

This is not solely a moral obligation. It is a strategic imperative that directly impacts:

- Employee retention and engagement
- Operational continuity and resilience

- Legal and regulatory exposure
- Brand trust and employer reputation

Employees can feel readiness, or the lack of it. A recent Safety+Health Magazine survey found that **61% of workers believe their organization is unprepared** for an active shooter situation. When employees do not believe their organization can protect them, the impact extends beyond physical safety into trust, confidence, and engagement.

Gallup's research consistently shows that disengagement is not a passive state, it is a precursor to withdrawal. Employees who feel unsafe or unsupported are less likely to fully engage in their work, more likely to experience anxiety and burnout, and more likely to consider leaving. Over time, this erosion of engagement becomes attrition.

The financial consequences are significant. Gallup estimates the cost to replace an individual employee can range from one-half to two times annual salary.

When leaders invest in readiness, they do more than reduce risk. They protect people and safeguard continuity, retention, and performance.

The 2024–2025 Threat Landscape: This Is Not a "School Problem"

A dangerous myth continues to shape organizational decision-making: that active threats are primarily a school issue.

They are not.

Workplace violence and active threats are no longer rare, isolated events. According to the FBI's most recent active shooter reporting, incidents in 2024 occurred across commerce, healthcare, education, government facilities, houses of worship, and other public spaces, reinforcing a critical reality: **no industry and no workplace can assume immunity.**

As a society, we continue to gather in these environments, and rightly so. But safety and security are fundamental human needs, and while risk extends beyond the four walls of the workplace, the responsibility for preparedness remains firmly with organizational leadership.

"Commerce" includes the environments such as retail, grocery, distribution centers, etc., and most leaders believe they are low risk, however, they account for **46% of active shooter incidents.**

Recent high-profile incidents across sectors reinforce that workplace violence is not theoretical. These events underscore a consistent pattern: organizations are judged not by whether an incident occurs, but by how prepared their people are to respond when it does.

These realities matter because active threat incidents often unfold rapidly, frequently before law enforcement can intervene, placing immediate safety decisions in the hands of employees and on-site leaders.

The Readiness Gap Employees Can Feel

WORKPLACE SAFETY APPROACHES: BRIDGING THE READINESS GAP

WHAT ORGANIZATIONS HAVE

COMPANY SAFETY POLICIES & PROCEDURES MANUAL

RUN 🏃
HIDE 🧍
FIGHT 🥊
Know your options. Stay safe.

ANNUAL SAFETY AWARENESS TRAINING - MODULE 1

COMPLIANCE CHECKLIST
- Quarterly Fire Drill Completed ✓
- Emergency Contacts Updated ✓
- Safety Audit Passed ✓
- Safety Audit Passed ✓

COMPLIANT

Plans ≠ Preparedness

THE READINESS GAP

Lack of Practical Training · Poor Communication · Panic & Uncertainty · Unclear Roles

WHAT EMPLOYEES NEED

EXIT → · EVACUATION DRILL

Plans ≠ Preparedness

What Constitutes a Workplace Threat?

Workplace threats do not begin with acts of violence. In many cases, they emerge through observable behaviors and environmental indicators such as:

- Verbal threats or expressions of intent from customers or other employees
- Escalating hostility, fixation, or grievance-driven behavior
- Harassment, stalking, or intimidation
- Domestic violence spillover into the workplace
- Unauthorized access attempts or boundary testing
- Significant changes in behavior reported by coworkers

Recognizing and addressing these indicators early is a core function of effective threat assessment and prevention.

Gallup's research on psychological safety suggests that when organizations create environments where people feel heard and protected, they can see measurable business outcomes, including a **27% reduction in turnover.**

In practical terms: a "culture of safety" is not a slogan. **It is a retention strategy.**

Why Site Threat Assessment Audits Are Foundational

You cannot protect what you have not evaluated.

A professional site threat assessment audit identifies:

- Physical vulnerabilities (access points, lighting, visibility)

- Behavioral risk factors (frontline exposure, conflict points)

- Procedural gaps (alerts, authority, escalation)

- Environmental constraints (where "run" is not possible)

- Communication failures (dead zones, unclear messaging)

Organizations are often surprised by what audits reveal:

- Doors that don't lock

- Unsecured vendor entrances or internal access to employee only areas

- Parking areas that create concealment

- Staff unsure who can declare lockdown

An audit replaces assumptions with data, and anxiety with clarity.

Emergency Action Plans: Necessary but Often Insufficient

An Emergency Action Plan (EAP) is not just a document. It is the organization's operating model during a crisis. It is developed in conjunction with a site assessment, making it specific to your physical location, not just a template.

A functional EAP defines:

- Alert triggers and authority

- Internal communication methods and redundancy

- Lockdown and evacuation options by zone

- Accountability and headcount procedures

- Law enforcement coordination

- Family and stakeholder communication

- Post-incident recovery and debriefing

Many plans fail because they are:

- Generic

- Untested

- Unknown to staff

- Disconnected from training

Why People Freeze: The Human Factor Leaders Must Address

When leaders imagine an active threat, they often assume employees will react decisively by running, locking doors and calling for help.

In reality, the human nervous system often does something else: **It freezes.**

Freezing is not a weakness. It is a predictable neurological response to a sudden threat, particularly when individuals have not practiced what action looks like in their specific environment.

When placed under stress, our:

- Heart rate increases and cognitive processing slows

- Time perception distorts

- Auditory exclusion occurs

- Decision-making narrows

Without rehearsed pathways, the brain struggles to respond effectively, which leads to freezing and can lead to consequential outcomes.

This is where many organizations unknowingly fall short. They provide information, not conditioning, thinking that is all that is required, creating a false narrative that "it

won't happen here."

Awareness & Readiness

Watching a video or reading a policy does not prepare the brain to act under threat. Readiness requires:

- Pre-decision/Mental Preparation ("If X happens here, we do Y")
- Environmental familiarity (which exits, which doors, which barriers)
- Repetition (enough to reduce hesitation)
- Role clarity (who alerts, who leads, who accounts)

Training that includes scenario-based decision-making and drills significantly reduces hesitation and panic because it gives the brain a script.

When employees have practiced response behaviors, even mentally, they are far less likely to freeze.

Time Is Not a Factor

There is a misconception that this all takes too much employee time and time is money.

Bi-annual training that is 15-minutes in length goes a long way, supported by an annual refresher training of 30-60 minutes. This is enough to create strong response pathways that can lead an organization to a successful outcome.

Most organizations don't hesitate to incorporate fire drills into their annual plans, therefore active shooter preparedness should be the same and can even be incorporated into a fire drill to save time.

The Power of Preparation: A Proven Case Study

Preparation saved 2,700 lives at Morgan Stanley on 9/11 | Rick Rescorla's legacy
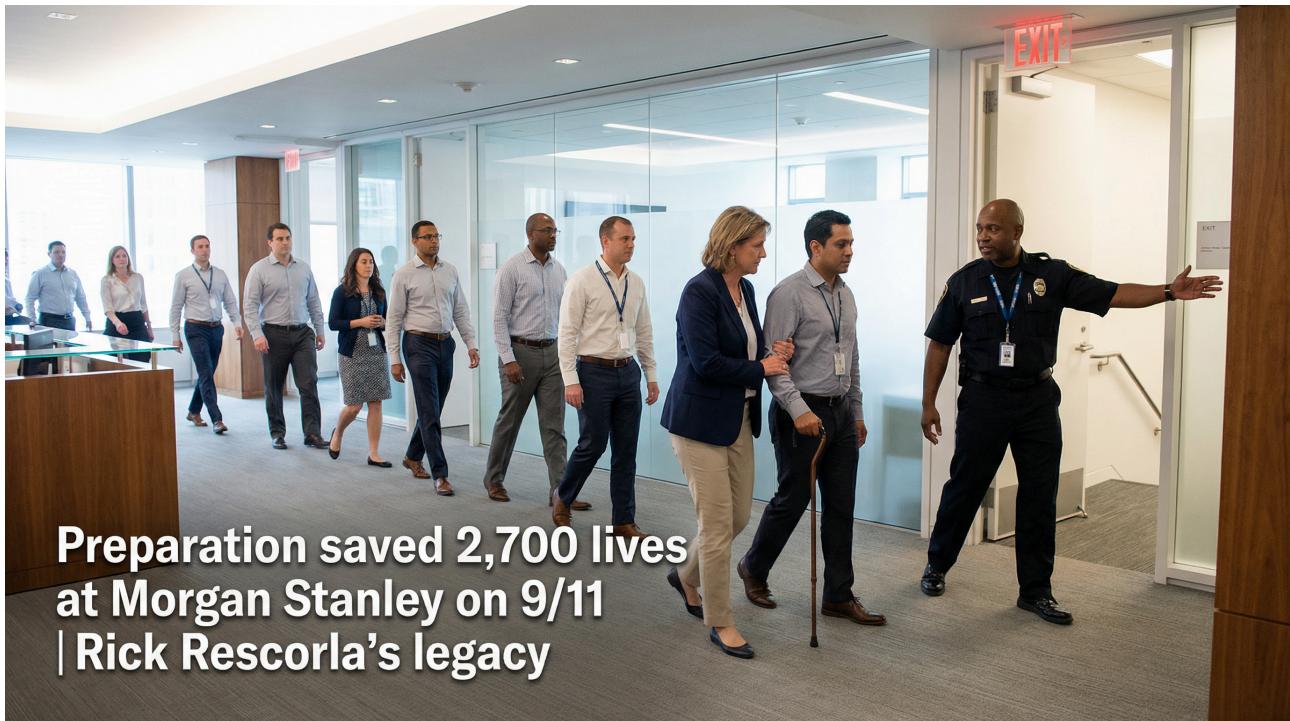
In the years leading up to September 11, 2001, Rick Rescorla, the Director of Security for Morgan Stanley, repeatedly warned that the World Trade Center was vulnerable to a large-scale attack. Based on his military experience and threat analysis, Rescorla believed that evacuation readiness, not assumption of safety, was critical.

Despite resistance from leadership concerned about productivity and lost time, Rescorla insisted on frequent, short evacuation drills, often lasting no more than 15 minutes. Employees were trained to respond calmly, follow clear routes, and move decisively under stress, conditioning that many viewed at the time as unnecessary and disruptive.

On September 11, that preparation proved paramount.

As the attacks unfolded, Morgan Stanley employees evacuated in an orderly and disciplined manner, guided by rehearsed procedures rather than panic. Thousands exited the towers before conditions deteriorated, a result widely attributed to Rescorla's insistence on preparedness and repeated drills. While continuing to re-enter the building to help others evacuate, Rick Rescorla lost his life.

His actions are widely credited with saving thousands of employees. Beyond the immeasurable human impact, the preservation of life and workforce continuity also

mitigated what could have been catastrophic operational and financial losses for the organization.

Rick Rescorla's legacy stands as a clear, real-world lesson for today's leaders: preparation is not a cost, it is an investment. Training that feels inconvenient in calm times becomes indispensable when it matters most.

Run, Hide, Fight: Useful Framework, Commonly Misused

RUN HIDE FIGHT: THE COMPLETE PREPAREDNESS FRAMEWORK

Framework, Not System
Adaptable principles, not a rigid script.

RUN, HIDE, FIGHT

DECISION MENU OPTIONS

Effectiveness Depends on What Surrounds It
Requires robust preparation and organizational support.

Context-Driven Decision Making
Options, Not Linear Steps

ASSESSMENT + PLANNING + TRAINING
The Critical Foundation for Effective Response

"Run, Hide, Fight" (RHF) is widely adopted because it was the first of its kind and it is simple and memorable. As a framework, it has value.

The problem is not RHF itself. The problem is when organizations stop there.

RHF is not a system. It is a decision menu.

Its effectiveness depends entirely on what surrounds it.

Common Gaps in RHF-Only Approaches

- Employees do not consider where to safely run to, often running towards a threat or barrier that stops them from getting to safety.
- Individuals are known to hide in spaces that they cannot easily escape from, leaving them vulnerable to attacks.
- Communication authority is unclear
- Staff have never practiced making decisions under stress
- "Fight" is mentioned but never contextualized and most people do not view themselves as a "fighter"

RHF assumes the individual can quickly evaluate options. Without practice, this assumption fails. If using this framework, organizations must teach what goes into Run, Hide, or Fight in their specific environment.

RHF should be treated as:

- Non-linear (options, not steps)
- Context-driven
- Practiced, not posted

Regulatory Momentum Is Increasing, But Regulation Alone Will Not Keep People Safe

Across the United States, regulators are beginning to acknowledge what frontline workers and safety professionals have known for years: workplace violence is a foreseeable risk that requires structured prevention, not a reactive response.

Recent legislation in California and New York reflects this shift. These laws represent meaningful progress, but they also expose an important truth for organizational leaders:

Meeting the minimum legal requirement does not equate to being operationally prepared.

California Senate Bill 553 — A New Baseline for Employers

Effective July 1, 2024

California's Senate Bill 553 represents one of the most comprehensive workplace violence prevention mandates in the country. Under SB 553, most California employers are now required to implement a Workplace Violence Prevention Plan (WVPP) that includes, at minimum:

- Identification and evaluation of workplace violence hazards

- Procedures to correct or mitigate identified risks

- Clear reporting mechanisms for threats or incidents

- Training for employees on how to recognize and respond to workplace violence

- Processes for incident investigation and recordkeeping

The intent of SB 553 is significant: it shifts workplace violence from being treated as an unpredictable anomaly to being recognized as a manageable occupational hazard, similar to fire risk or chemical exposure.

However, SB 553 primarily addresses documentation, policy presence, and baseline training. It does not ensure that:

- The assessment meaningfully reflects real-world threat pathways

- Employees can make decisions under stress

- Plans have been tested through drills or exercises

- Leadership roles during an incident are understood and rehearsed

In other words, SB 553 establishes compliance infrastructure, not behavioral readiness.

Organizations that treat SB 553 as a paperwork exercise may meet regulatory expectations while still leaving employees vulnerable during an actual event. In other words, **the law creates a floor, not a ceiling, for preparedness.**

New York Retail Worker Safety Act — Targeted Progress

Effective June 2, 2025

New York's Retail Worker Safety Act (NYRWSA) reflects a growing recognition that frontline retail employees face elevated risks of violence, harassment, and assault. The law requires covered retail employers to:

- Adopt a workplace violence prevention policy

- Provide training on recognizing and responding to workplace violence

- Establish reporting and response procedures

This is an important acknowledgment of the realities facing retail workers, particularly in environments with high public access, cash handling, and frequent customer conflict.

However, the scope of the law is intentionally narrow:

- It applies only to certain retail employers

- It does not mandate site-specific threat assessments

- It does not require drills, scenario-based training, or response testing

- It does not address broader operational coordination or recovery planning

As a result, the law improves awareness and reporting, but it does not ensure that employees know what to do in the moment when a threat escalates rapidly.

The Leadership Gap Regulation Cannot Fill

Both SB 553 and the New York Retail Worker Safety Act signal where the regulatory landscape is heading: greater accountability for violence prevention.

Yet neither law, and no law, can mandate:

- Decision-making quality under stress
- Trust in leadership during crisis

- Confidence that plans will work in real conditions
- A culture where employees feel protected, not just informed

That responsibility rests squarely with leadership.

OSHA's General Duty Clause: Where Legal Exposure Becomes Real

While recent state legislation such as California's SB 553 and New York's Retail Worker Safety Act establish new compliance baselines, federal enforcement exposure already exists today, even in states without specific workplace violence statutes.

At the federal level, OSHA relies on the **General Duty Clause, Section 5(a)(1)** of the Occupational Safety and Health Act, to hold employers accountable when workers are exposed to recognized hazards that can cause death or serious physical harm.

Why the General Duty Clause Creates Significant Risk

Unlike state laws that prescribe specific documentation or training requirements, the General Duty Clause functions differently, and more broadly.

Under the General Duty Clause, OSHA does not need a specific workplace violence standard to issue a citation. Instead, enforcement hinges on whether:

1. A workplace violence hazard was recognized or foreseeable,
2. The hazard was capable of causing serious harm or death,
3. Feasible measures existed to reduce or mitigate the hazard, and
4. The employer failed to implement those measures.

This framework places the burden squarely on leadership judgment, not on regulatory checklists.

In practical terms, once an organization is aware of:

- Prior incidents or threats
- Industry-wide risk data

- Employee reports or warning behaviors

- Known environmental or procedural vulnerabilities

…it is considered on notice. OSHA guidance continues to emphasize that employers who become aware of threats, intimidation, or other indicators of violence risk should implement a workplace violence prevention program or risk citation under the General Duty Clause.

The takeaway for leaders across all industries is clear:

Workplace violence is now considered a foreseeable occupational hazard, and OSHA expects proactive management of that risk.

Why This Matters Beyond Compliance

General Duty Clause citations carry consequences that extend far beyond fines:

- Mandatory corrective action programs

- Increased scrutiny during future inspections

- Elevated civil liability exposure

- Damage to employee trust and organizational credibility

Perhaps most importantly, these citations often arise after harm has already occurred, when prevention opportunities were missed.

Organizations that proactively implement site-specific assessments, tested plans, and realistic training are not only better positioned to protect their people, they are also far better positioned to defend their decisions if an incident occurs.

State laws define minimum expectations. OSHA enforcement defines accountability. Leadership defines outcomes.

Training: Turning Plans into Behavior

From Compliance to Readiness.

STAGE 1: AWARENESS	STAGE 2: SKILL DEVELOPMENT	STAGE 3: REHEARSAL & PRACTICE	STAGE 4: CONTINUOUS IMPROVEMENT
Information only, no practice.	Understanding response options.	Muscle memory under stress.	Testing, refining, adapting.

Where is your organization today?

Plans are potential energy. Training converts them into action.

High-quality programs address:

- Decision-making under stress

- Freezing and hesitation

- Environmental navigation

- Role coordination

If an organization cannot answer:

- "What did we change after training?"

- "Where would an incident most likely start here?"

- "Who leads and who accounts for people?"

Then a culture of safety has not been developed and adopted.

Culture of Safety: Why Systems Matter
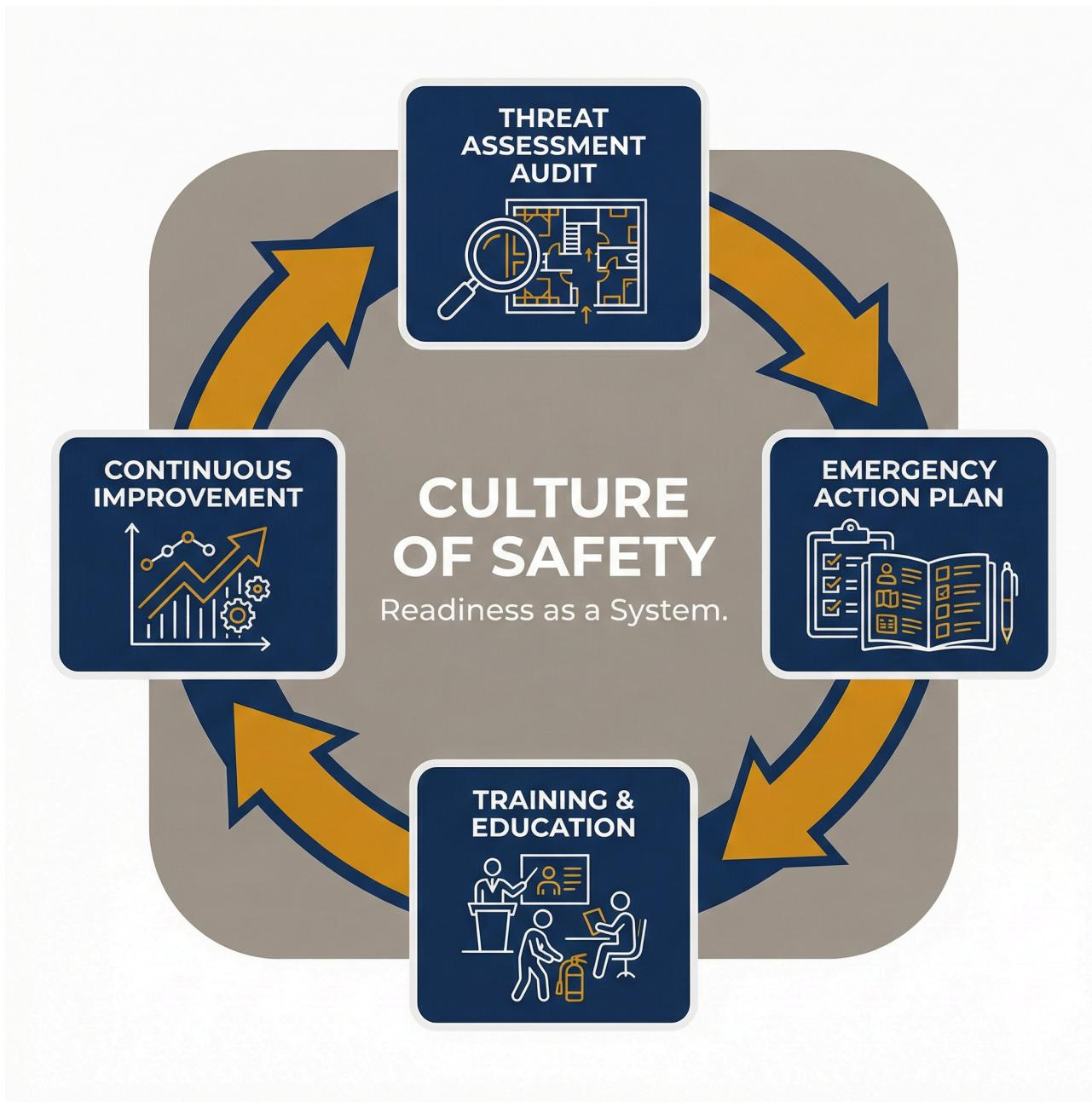
Culture is shaped by what leaders prioritize, fund, and reinforce.

A full-scale readiness system builds a culture of safety because it:

- Signals seriousness
- Encourages reporting
- Reduces fear
- Builds trust

When gaps exist, organizations develop false confidence, which is more dangerous than acknowledged risk. Systems prevent single points of failure.

PSYCHOLOGICAL SAFETY ENABLES ACTION

When employees trust leadership, they engage fully.

The CFO & COO Perspective: This Is Business Risk

Safety is not a soft issue.

For CFOs and COOs, it directly impacts:

- Continuity

- Liability

- Insurance

- Workforce stability

Gallup's 2025 reporting estimates that employee disengagement cost the global economy **$438 billion in 2024.**

Perceived safety and trust in leadership are major drivers of engagement.

When employees feel unsafe, they disengage, and disengagement is expensive.

The Pursuit Pathways Philosophy

Pursuit Pathways was founded on a simple truth:

Readiness is not a product. It is a system. In a world with ever increasing threats and acts of violence, action must be taken to protect infrastructure and people, going beyond just the workplace.

We help organizations with:

- Threat assessment audits
- Emergency action plans and supporting policies
- Education and training
- Continuous improvement cycles

This is leadership work, not fear-based work and we support you on this mission.

Practical Next Steps for Leaders

Ask yourself:

1. When, if ever, was our last threat assessment, and what changed?
2. Do managers know their roles in a crisis?
3. Have we trained beyond run, hide, fight?
4. Do employees trust our preparedness?
5. Do we close gaps after processes we have implemented?

Closing Thought

Safety is not about predicting the next incident.

It is about ensuring your people know what to do when something unexpected happens, at the workplace and beyond.

That is leadership. That is readiness. That is a culture of safety.

Ready to go to the next step? Schedule your Free Safety Gap Analysis today.

About the Author

Dave Miller is a former police officer with 15 years of service, including eight years in tactical operations. He is a trained tactical medic and a member of the Association of Threat Assessment Professionals (ATAP). Dave is certified in civilian response strategies and organizational readiness for workplace violence and active threats.

He is the creator of the **ACTD™ (Assess, Commit, Take Action, Debrief) model**, a systems-based framework designed to help organizations move beyond compliance toward practical, human-centered preparedness. As Founder of Pursuit Pathways Inc., Dave partners with organizations across industries to build cultures of safety through threat assessment, emergency planning, training, and continuous improvement.

For more information or to schedule your Free Safety Gap Analysis:
www.pursuitpathways.com