# Phase 3 Facilitator Guide – Legal / Compliance Team

## Phase Overview: Full Crisis Realised (T+60 to T+90)

This phase sees legal pressure peak. Misrouted containers, union escalation, and potential breach declarations must now be handled with procedural care. Legal’s input is critical to shaping the Executive and Media response while monitoring regulatory risk.

This phase tests:

* Escalation management with compliance exposure
* Decision support for Executive
* Legal framing of media and stakeholder messaging

## Injects Relevant to Legal

### P3-1 (T+60 to T+70)

**INJ010C (Noise):** Finance email about cost centre codes  
**INJ010D:** Legal Intern queries if Port Authority should be notified

**Facilitator Notes (P3-1)**

* Legal should clarify who is authorised to notify Port Authority.
* They should advise Executive on notification risk.
* Prompt:
  + "Does this event meet the Port Authority threshold?"
  + "Has a formal breach or notification process been initiated?"

### P3-2 (T+70 to T+80)

**INJ011E:** Union tweet with ‘sabotage’ claim; quote: "we warned them"

**Facilitator Notes (P3-2)**

* Legal should advise on defamation, public statement risk, and employment law implications.
* Prompt:
  + "What guidance are you providing to Media and Exec in response to the union's claim?"
  + "Is there risk exposure from rebutting or acknowledging the post?"

### P3-3 (T+80 to T+90)

**INJ012B:** Journalist sends a second CEO interview request  
**INJ012E:** Journalist camera crew now waiting at the gate

**Facilitator Notes (P3-3)**

* Legal must now prepare rapid review of any public comment draft.
* Final vetting for media interviews.
* Prompt:
  + "Are you clearing the CEO briefing content?"
  + "Have you logged formal legal approval of the message?"

## Legal Role Expectations

* Guide compliance-related notifications
* Vet any public or recorded statements
* Flag regulatory and reputational exposure

**Key Policy References:**

* Breach Disclosure Checklist – Step 4
* Legal Notification Thresholds – Port Authority

## Legal Decision Point – Phase 3

**Decision: Approve Notification to Port Authority?**

|  |  |  |  |
| --- | --- | --- | --- |
| **Option** | **Description** | **Implication** | **Score** |
| ✅ Notify regulator with Executive coordination | Transparent | Protects licence, shows procedural integrity | +9 |
| ⚠️ Advise hold pending further clarity | Defensive | Slightly delayed, low risk | +1 |
| ❌ Recommend no notification | Risky | Could violate threshold policy | -6 |

## End-of-Phase Checkpoint Prompt

At or near **T+90**, facilitator should ask:

"Legal team — what is your position on Port Authority notification? Have you cleared any CEO public comments or statements for legal risk?"

## Tip for Facilitator

If Legal delays action:

* Reference INJ010D and INJ012B
* Ask whether they’ve reviewed the Breach Disclosure Checklist
* Clarify whether approval has been documented and relayed to Exec

#### End of Phase 3 – Legal / Compliance Team Facilitator Guide