



# **Gate Access Requirements for Non-Dow Individuals Requesting a Permanent Badge to Allow Entry into the Union Carbide Texas City Site**



# Why Changes to Gate Access Process?

- Since September 11, 2001
  - Need to Improve Site and Community Security
  - Extensive Security Vulnerability Assessments at UCC/Dow
    - Need to Enhance Background Checks
    - Need to Enhance Gate Entry Process
  - New Government Regulations and Guidelines for Chemical Industry



# Requirements for Permanent Badge

- Review background of all non-Dow individuals who request a permanent badge
  - HIRECHECK Basic Package (Set up through Texas City Safety Council)
    - Social Security Verification (SSN)
    - Motor Vehicle Registration
    - <=3 County Criminals (Felony Convictions within 7 year period)
  - Patriot Act Check (HIRECHECK handles, set up through Safety Council)
  - Verification of Citizenship
    - Social Security Number or an Appropriate Work VISA if not a U.S. Citizen
    - If no Social Security Number ES&S will contact (Heather Finney, Kathy Schroeder or Carrie Lafleur) in Midland to get clearance
- “Background Screen Verification Form” must be filled out and signed by a Contractor Company Representative and delivered to Dow ES&S
- “Hire-In Slip Badge Request Form” must be filled out and signed by Contractor Company Representative and Contractor Employee and delivered to Dow ES&S
- Review background of all non-Dow individuals who already have a permanent badge (will be same as above)



# Background Screen Verification Form

- Verification of Criminal History Check – Last 7 years for convictions of any crimes involving theft, destruction of property, violence or drugs, and Patriots Act.
- Check of Citizenship
- Verification of Social Security Number

(If there are any discrepancies, exceptions may be made on a case by case basis by the ES&S Leader)



# Hire-In Slip Badge Request Form

- Contractor Company Representative signs page two of the UCC hire-slip as written confirmation that site access requirements have been met. These include:
  - Social Security Number Verification
  - Background Screen Completed and Cleared
  - Appropriate Safety Training Completed
  - Pre-Access Drug Screen Requirements Completed
  - Has demonstrated oral and comprehension abilities of English language



# Hire-In Slip Badge Request Form

- Contractor Employee signs confirming information listed is correct
  - Personal Information ( Date of birth, height, weight, drivers license number, etc.)
  - Former employee of contractor company working on site?
  - Worked in UCC Texas City within last 6 months?
  - What company did you work for?
  - Have you ever been convicted **For Any Law Violations** other than minor traffic in the last 7 years?



# Timeline for Criminal Background Check Requirements

- June 2004 - Communications to Contractor Companies
- July 2004 – Implement new gate access requirements for Non-Dow Individuals requesting a badge
- By July 2005 – Non-Dow individuals in possession of badge, prior to July 2004, to work at UCC TCO will re-badge with new gate access requirements. This will be accomplished on a company-by-company basis



# Estimated Cost and Time Frame of Background Check

- HIRECHECK Basic Package and Patriot Act Check:
- Check the CSC/TC website for member / non-member pricing:

<http://www.csctc.org>



# Contractors' Safety Council of Texas City

- Sets up an account with HIRECHECK
- HIRECHECK bills Safety Council
- Safety Council bills Contractor Companies



# Questions and Answers

- **If a person changes contractor companies and had a background screen with his or her previous company, does the person need to have another background screen?**
- No. One of the benefits of coordinating the background screens through a centralized organization or agency, such as a contractor safety council, is that the background screenings can be consolidated. If a background screen was conducted within the last twenty-four (24) months prior to requesting the new entry badge, the previous screening can be used and a new background screen is not required.



# Questions and Answers

- **Are those employees who are already in possession of an entry badge for Dow required to have a background screen to be accomplished?**
- Yes. The companies employing the individuals will be required to complete a background screen on each person over the next year. Companies timeline for completion is July 31, 2005.



# Questions and Answers

- **How often will the background screens be conducted?**
- Background screens are required to be updated every seven (7) years if a person stays with the same non-Dow company and continuously works at the same facility, every three (3) years if a person stays with the same non-Dow company but works at more than one facility. It also must be updated or completed when the person changes companies and requests a new Dow entry badge (unless a background screen has been conducted within the previous 24 months).



# Questions and Answers

- **What happens if a person is convicted of a crime after the background screening has been conducted?**
- Companies should frequently review the performance of their employees (attendance, daily performance, etc.) and investigate any reports of possible activity that could jeopardize his or her ability to work on the Dow site. Any confirmed criminal conviction should be reported and discussed with Dow's site ES&S for appropriate action.



# Questions and Answers

- **What if a person is convicted and currently on parole for that conviction?**
- Convictions related to theft, violence or drugs could jeopardize a person's ability to work on the Dow site. Any confirmed criminal conviction should be reported and discussed with Dow's site ES&S for appropriate action.



# Questions and Answers

- **When a person doesn't enter the Dow site for 3 months (for whatever reason) his or her electronic entry badge will be deactivated. What happens when the person comes back to work on the Dow site for the same or a different contractor company?**
- When a person's entry badge has been deactivated because he or she has been out of the site for more than three months, the contractor company should send the person to B199 with the same information required of a "new hire", i.e. hire-in slip, background screening verification form, and contractor safety council card.



# Questions and Answers

- **When the background screening process starts, if a company knows of an issue with a currently badged contractor company employee, i.e. false Social Security Number, significant criminal history, etc., what will happen?**
- The contractor company must immediately contact Dow ES&S for consultation.



# Questions and Answers

- **Can I use a different agency than First Advantage to perform my background checks or perform my own?**
- The background check process administered through the Safety Councils and First Advantage will have reciprocity across Dow and UCC locations in Texas. Agencies or processes other than those established through the Safety Councils must be approved by ES&S