



**LOWERS  
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**COURIER CERTIFICATION STANDARDS  
FOR THE  
BANKING SERVICES SECTOR**

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## I. PERSONNEL

Regardless of the source of applicants, the Courier Company must ensure that policies and procedures are in place to ensure that the standards below are met. Sources of applicants include direct hires, independent contractors, employees and subcontractors of independent contractors and third party companies.

### A. Personnel Screening

#### 1. Documentation of Policies and Procedures:

Courier must have current written policies and procedures available to all individuals involved in the hiring or contracting process. The policy must require the disclosure of arrest for any criminal act by the employee or independent contractor during the term of contract or employment.

#### 2. Application for Employment or Independent Contractor Status:

An application must be available for applicants for hire or for contracting. The application must collect all information necessary to complete a full background check over the past seven years. As a minimum, all applications used by any entity in the hiring or contracting process must elicit the information outlined below. It is incumbent upon the Courier Company to verify the adequacy of any application:

- a. Full name and any alias used.
- b. Current residence and telephone number. (No post office boxes; must have street address.)
- c. Prior residences for last seven years.
- d. Previous employment for the last seven years.

#### 3. Applicant Release Form:

A release document separate from the application authorizing the background check must be used as part of the personnel screening process.

#### 4. Background Investigations:

At a minimum, in order to qualify as a full background check, the following required checks must be conducted by or through a third party Consumer Reporting Agency that is a member in good standing of the National Association of Professional Background Screeners.

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- a. Social security validation that verifies to the extent possible the subject's identity and confirms address history. Additional addresses or identities must be added to the scope of the criminal records research.
  - b. National database search that searches publicly available government watch and sanctions registries as well as databased criminal records for jurisdictions that are made available.
  - c. County criminal record research comprised of the search of all jurisdictions of residence for the past seven years. Misdemeanor and felony records must be checked. State wide research is acceptable if local records research is not viable due to access restrictions (i.e. CT).
  - d. Federal criminal record research of all federal districts of residence within the past seven years.
  - e. Motor vehicle record check must be conducted in the state of licensure upon initial contract or employment.
5. **Drug Screening:** In addition to the above background checks, prospective employees or independent contractors must be given drug screening prior to hiring or contracting. As a minimum, a "five-panel" drug screen must be conducted as part of the screening process.

In addition, Annual Random Drug Screens must be conducted. Annual rescreening of all drivers involved in the transportation of Pharmaceuticals is recommended. At a minimum, 12 ½ percent of all drivers in the pool must be rescreened each quarter in order to ensure that 50 percent of the driver pool is rescreened each year

6. **Annual Background Update:** At a minimum, an annual update of motor vehicle records and a national database search must be conducted.
7. **Management Review:** Management must review and document all completed applications and background checks prior to hiring or contracting.

Evaluation of the information received by management may cause an applicant to be disqualified from further consideration. While the criteria may vary from company-to-company, a standard must be established in writing and consistently followed.

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Disqualification from consideration as an employee or contractor, or any derogatory information resulting from the investigation must be thoroughly documented and maintained in the applicant's file.

All applicants should be notified that periodic re-evaluations of background data can and will be conducted without subsequent prior notice.

## **B. Independent Contractor Agreement**

All independent contractors must be required to sign an independent contractor agreement. This agreement is important in that it lays out the terms and conditions under which the independent contractors operate. Management must ensure that there is a signed independent contract agreement for each independent contractor. The independent contractor agreement must outline the security standards that each independent contractor must follow and contain work specifications that details the criteria the independent contractor must meet to complete the work for each customer. In addition, the agreement must specify the penalties for violation of the terms and conditions of the contract up to possible termination of the contract.

The IC Agreement must explicitly prohibit the use of IC employees or sub-contractors who have not met all the contractual requirements of the primary contractor.

## **C. ID Cards and Uniforms: Control and Issue**

### 1. ID Cards:

a. ID cards must be issued to all full-time and part-time employees and to all Independent Contractors. If employees or sub-contractors of the IC are used to perform courier services to the banking industry, then ID cards must be furnished to them also.

b. Employee and contractor ID cards must conform to the following format:

- Color photograph (front facial view as a minimum)
- Typed name and signature as it appears on the signature list
- Employee or contractor number and unique ID badge number
- Name, address, and telephone number of the company
- Signature and printed name of the company officer authenticating the card
- Date of expiration
- Instructions if card is found, including guaranteed postage

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- c. The issuance and cancellation of ID cards must be controlled by management.
  - Employees and contractors must wear their ID's in clear view

2. Loss of ID's must be reported immediately and a new ID issued.

## D. Training and Familiarization

Employees and independent contractors must undergo training or (in the case of contractors) pre-contract customer orientation, in order for them to understand the policies and procedures of the Company, as well as the security and operational requirements of the Company's clients when picking up, transporting, and delivering bank work. All training or attendance at pre-contract orientations must be documented. Separate attachments must be developed that incorporate each Bank's specific security and operational requirements.

## II. FLEET SECURITY

### A. Documentation of Fleet Security Standards

Fleet security standards must be established and documented at the corporate level. These standards must clearly set out: the acceptable types of vehicles, required vehicle features, initial inspection requirements, routine inspection schedules, driver capabilities/training, and any supporting documentation that must be maintained concerning each vehicle. These standards apply to all vehicles used to perform courier operations, regardless of ownership.

### B. Prohibited Vehicles and Vehicle Configurations

1. Specific vehicles are prohibited from use such as:
  - Pickup trucks without fully enclosed and lockable bed cover, unless cargo is secured in the driver's compartment with a cable and lock.
  - Vehicles without a secure cargo area, such as convertibles
  - Motorcycles
  - Bicycles
  - Vehicles without the capability to have a cable or chain anchored to the floor or seat in the driver's compartment

### C. Fleet Equipment

1. **Communications:** Each vehicle must be equipped to allow two-way communications with law enforcement, company management, and/or the company dispatcher.

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2. **Accident management packs (company-owned vehicles only):** Each vehicle must be equipped with accident management tools including a disposable camera, accident information cards (generally provided by the auto insurance company), and emergency contact numbers.
3. **Cargo Security:** Whenever cargo is transported in a vehicle, it must be secured to the vehicle. This is typically done through a cable that is anchored to the vehicle in the trunk (if equipped) and a lock. Other methods include a large strongbox, anchored to the vehicle, and secured with a lock. Any method used must be sufficient to ensure that all cargo onboard the vehicle is secured either in a locked box, locked bag, or by using a cable and lock through the handles of individual bags. Wherever cargo is stored, it must not be visible from outside the vehicle.
4. **Signage:** Each vehicle used to transport cargo must be equipped with window signs or magnetic signs indicating that no cash is onboard.

### III. STREET OPERATIONS SECURITY

#### A. Documentation of Operational Security Standards

Operational security standards must be established and documented at the corporate level. These standards must clearly set out security standards for route operations including how cargo is secured and protected in the vehicle, how cargo is containerized, chain of custody procedures, communication procedures, and emergency procedures.

#### B. Non-Permissible Activities

Non Permissible activities must be documented; some of these include:

1. No passengers who have not been screened by Courier Company and have a contractual agreement with the Courier Company
2. No family or no friends in the vehicle during courier operations
3. No firearms

#### C. Vehicle to Vehicle Transfers/Relay Routes

1. **Vehicle Transfers:** Whenever possible, the following policies and procedures must be implemented during such transfers:
  - a. Vary Time: Although schedules may prohibit varying the times of transfers, it should be done whenever possible.

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- b. Vary Location: A series of locations may be established ahead of time and the actual location of the meeting may be decided at a predetermined time. Observable patterns must be avoided in the selection process if it is to be a successful tool for reducing risk.
  - c. Right Location: Suitable locations must be picked, preferably in a protected area such as police department parking lot or in an area under regular surveillance by police or security. Avoid excessively crowded parking lots that may conceal an attacker's intentions. Meeting location must have good fields of observation that allow the approach of an attacker to be recognized.
2. **Relay Routes:** Procedures must be in place to ensure relay routes receive added attention from the dispatcher or management as a result of the increased amount of cargo that is onboard. Added security measures must be based on reducing the actual exposure during an attack, increasing deterrence, increasing the potential for detecting an attack, creating opportunities to avoid an attack.
- a. Excessive cargo amounts must be split between two or more routes and transported separately
  - b. Designated checkpoints have been established and utilized to ensure regular communications between the route and the dispatcher or management.
  - c. Secure all cargo. All cargo must be secured in the vehicle and to the vehicle during the movement.

### D. Suspicious Activity Reporting

#### 1. Documentation

- a. A corporate standardized suspicious activity report must be established and distributed throughout the company for use. The document must include space for information which includes date/time, location, vehicle information, identifying features of persons, and any actions taken by management.

#### 2. Reporting

- a. Couriers must report suspicious activities either to management or the dispatcher as they happen or a reasonable amount of time afterwards. But in every instance, they must be reported no later than the end of the courier's daily route.

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- b. A suspicious activity report must be completed and provided to management for review

### **3. Response**

- a. Management must maintain a documented plan for responding to suspicious activity reports.

### **E. Street Operations Audits**

Management must conduct regular unannounced audits of street operations to ensure compliance with corporate policies. A street operations audit program must include:

1. A review of key aspects of courier performance such as:
  - Safe driving – abiding by all traffic laws and regulations
  - Consistent use of seatbelts
  - Selecting an appropriate parking position
  - Securing the vehicle appropriately
  - Securing cargo within vehicle properly
  - Presenting an alert image whenever on the pavement
  - Carrying cargo properly
  - Not drawing undue attention to oneself
  - Proper wear of uniform items and ID badge
  - Vehicle signage conforms to the standard
2. Sufficient surveillances so that each courier is observed at least twice per calendar year.
3. Each audit must be documented and reviewed with couriers.
4. Couriers must sign an acknowledgement of receiving the critique.
5. Couriers performing poorly must be sanctioned as determined by corporate policy.

## **IV. CARGO ACCOUNTABILITY**

### **A. Transfers of Custody**

All transfers of custody of cargo (bank proof work and mail) must enforce chain of custody procedures. *This includes cargo transferred to an aircraft for air transport to another courier and subsequent delivery to a processing center.*

Transfer documentation must include space for:

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1. Date and time of transfer
2. Number of container(s)
3. The number of items transferred
4. Container/bag number or seal number (i.e., BOA-123, Seal #12345, etc.)
5. Whether the container/bag is locked or unlocked
6. FULL signature of transferor and receiver. (Initials are not acceptable)

A "sample" of a form that meets these specifications is attached as Appendix One. All entries on this form should be in ink. The use of "white out," "liquid paper," or similar products must be prohibited by policy. Changes to entries must be lined through in ink, the entry corrected, and then the initials of the person correcting it should be annotated next to the change.

Route supervisors and management must review completed transfer documentation on a daily basis for accuracy and completeness. Of greater importance, however, is the reconciliation of the cargo picked up against what was received. The number of bags/containers received from the branches must be verified against what was signed for by the relay route driver and/or the processing center or airport recipient. Any discrepancies must be immediately investigated.

### **V. FACILITY/TERMINAL SECURITY**

#### **A. Physical Security**

1. CCTV: If the facility is used as a mail or proof sorting facility, as a minimum CCTV cameras are installed at appropriate locations and monitored by the dispatcher.
2. The dispatch center is physically segregated from other operations.
3. If the design of the building will allow it, visitors and vendors enter the facility through a pedestrian entrance that is separate from the entrance used by couriers.
4. Visitors and vendors are escorted throughout the duration of their stay.

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## B. Control and issue of Access Devices and Customer Keys

1. **Perpetual Inventory:** A “perpetual” inventory must exist of all active and spare keys. The inventory must be documented.
2. **Key Markings:** Keys or key cards must not bear markings that would indicate the location to which they provide access
3. **Storage:** Un-issued keys and key cards must be secured in a locked, sturdy, metal container (key box, safe, file cabinet, etc).
4. **Accountability:** All access devices (keys, key cards, alarm codes) that are issued to employees or Independent Contractors must be signed for by the recipient. If they are issued on a daily basis, documentation must be maintained to reflect issue and turn-in. All access devices issued on a daily basis must be reconciled daily. Access devices that are issued on a permanent basis must also be signed for and a copy of the receipt placed in the recipient’s file.
5. **Notification:** If a driver has been issued access devices to a bank facility on a permanent basis and fails to turn-in such devices when no longer hired or employed, the bank must be immediately notified.

## VI. EMERGENCY RESPONSE PLANS

Courier management must develop a plan for responding to the incidents listed below. The plan must include all procedures listed below and also contain emergency contact numbers to assist in following the emergency response plan. Those individuals responsible for implementing the plan must be trained initially and should undergo annual retraining. The training must be documented.

### A. Lost or Stolen Courier Bag

1. Courier must immediately notify dispatch and management.
2. Courier/dispatch/management must notify the police
3. Dispatch/management notifies the bank
4. Courier must identify what was lost or stolen by reconciling the available documentation with the remaining physical inventory
5. In the event of a stolen/lost bag, courier personnel and management must canvas the area and search likely locations for the stolen bag/bags.

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6. In the event of a lost bag, courier personnel and management must retrace the route in search of the lost bag
7. The remaining bags must be transferred to another driver to complete the route
8. Courier must complete an incident report and provide a written statement of the incident

### **B. Courier Vehicle Accident or Fire**

1. Obtain immediate medical attention for those that may be injured
2. Courier notifies dispatch of emergency
3. Dispatch management notifies police.
4. Courier management must determine if reconstruction is required and immediately notify bank personnel of the incident
5. The undamaged bags must be transferred to another driver to complete the route
6. Courier must complete a full incident report and provide a written statement

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# **APPENDIX ONE**

## **Sample Cargo Custody Receipt Form**

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## ABC BANK DAILY LOGSHEET

Route #: \_\_\_\_\_

Today's Date: \_\_\_\_\_

Days: Monday-Friday

XYZ Courier Service

Location	Mail Code	Drop Off						Pick Up						Scheduled Arrival Time	Actual Time		FULL SIGNATURES
		Mail			Proof			Mail			Proof				Arrive	Depart	
		Number of Items	Locked (Y/N)	Container or Seal Number	Number of Items	Locked (Y/N)	Container or Seal Number	Number of Items	Locked (Y/N)	Container or Seal Number	Number of Items	Locked (Y/N)	Container or Seal Number				
Townsboro Main 115 Johnson St., Columbia, MD 21042	777-09	1	N											10:55- 11:05			Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
																	Branch <span style="float: right;">Check if no proof work <input type="checkbox"/></span> Courier
Driver's Printed Name:		Received By Relay Route Driver (Full Signature)						Received At Processing Center By (Full Signature)									
Driver's Full Signature		DATE		TIME		Total Items		DATE		TIME		Total Items					

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## **APPENDIX TWO**

### **Sample Street Surveillance Form**

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COURIER(S): \_\_\_\_\_ VEHICLE LICENSE PLATE: \_\_\_\_\_

DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ ROUTE: \_\_\_\_\_

CUSTOMER: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

CITY & STATE: \_\_\_\_\_

		GOOD	SATISFACTORY	POOR	UNSAT	NOT APPLICABLE	NOT OBSERVED	COMMENTS
<b>1.</b>	<b>DRIVING PERFORMANCE</b>							
	a. Obeys traffic laws							
	b. Consistently wears seatbelt							
<b>2.</b>	<b>PARKING SELECTION</b>							
	a. Observation of surrounding area							
	b. Appropriateness of selection							
<b>3.</b>	<b>COURIER APPEARANCE</b>							
	a. ID badge worn visibly							
	b. Uniform worn							
<b>4.</b>	<b>CARGO SECURITY (arrival)</b>							
	a. Vehicle doors locked							
	b. Ignition keys removed							
	c. Windows rolled up							
	d. Trunk locked (if used as cargo area)							
	e. Proof bags secured to chain/cable							
	f. Cargo hidden (if secured in passenger area)							
<b>5.</b>	<b>TO/FROM CUSTOMER LOCATION</b>							
	a. Observes surroundings							
	b. Presents an alert image							

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6.	CARGO SECURITY (departure)								
	a. Cargo secured to cable/chain/or in container immediately after leaving the financial institution								
	b. Enters vehicle quickly								
	c. Locks the car doors								
7.	DOCUMENTATION								
	a. Number of items delivered correctly identified								
	b. Number of items picked-up correctly identified								
	c. Signature of teller obtained for pick-up and delivery								
	d. Courier signed for each pick-up and delivery								
	e. Full signatures obtained/used								
8.	VEHICLE								
	a. Vehicle clean								
	b. Body of vehicle in good condition								
	c. Tires in good condition								
	d. Driver has required insurance documentation								
	e. Driver has current driver's license								
	f. No unauthorized passengers								
	g. Vehicle signage conforms to standard								
<b>Additional Comments:</b>									
Signature of Observer			Signature of Courier			Management Representative's Signature			
<b>Action Taken By Management (circle as appropriate)</b>									
Employee Advised: Yes / No		Verbal Warning: Yes / No		Written Warning: Yes / No		Dismissal: Yes / No			
OTHER ACTION:									

## **INSURANCE GUIDELINES**

1. As a minimum, the following types of insurance should be provided by the Company or by the Independent Contractor:
  - a. Commercial Auto Policy (contractor) or Non-Owned & Hire (Company)
  - b. Workmen's Compensation (Company) or Occupational and Accident Insurance with Disability coverage (contractors)
  - c. All Risk Cargo Insurance (contractors)
  - d. Commercial General Liability (Company)
  - e. Employee dishonesty (Company)
  - f. All Risk/Full Face Value (Company)
  - g. Costs of reconstruction (Company)
  
2. Independent contractors should produce proof of insurance to the Company prior to commencing service. If the IC uses any sub-contractors, the IC should provide similar proof of coverage to the Company before providing service to the Company.
  
3. The Company should maintain copies of the IC's insurance policies in the contractor's file.
  
4. The Company should develop a computer-based system for tracking the expiration dates of the IC's various insurance policies and the IC's driver license expiration date. The system should notify the Company and the IC of pending expirations in sufficient time to allow the IC to complete any renewals. Proof of renewals should be provided by the IC to the Company.

## **PRE-EMPLOYMENT SCREENING GUIDELINES FOR DISQUALIFICATION OF APPLICANTS**

**Suggested guidelines** for disqualification include one or a combination of the following:

- Conviction of, or pre-trial diversion for, any felony within the last seven years
- Conviction of, or pre-trial diversion for, a dishonest act, breach of trust, or money laundering within the last seven years
- Conviction of, or pre-trial diversion for, sale or trafficking in illegal drugs within the last seven years
- Conviction of, or pre-trial diversion for, use of illegal drugs within the last five years
- Conviction of or pre-trial diversion for, a serious misdemeanor within the last seven years. NOTE: This must be carefully evaluated. What constitutes a misdemeanor can vary from one jurisdiction to another. It is suggested that one evaluate the sentence that was given, or could have been given, when assessing the seriousness of the misdemeanor. A sentence of 90 days or more is sometimes used as the dividing line between less serious and more serious misdemeanors. Advice of corporate counsel is suggested before finalizing the policy.
- Conviction of driving under the influence (DUI), or driving while intoxicated (DWI) within the last three years
- Driving record indicating applicant had a suspended or revoked license, or has a high accumulation of points on driving record
- Falsification of any application data or information given verbally to any company interviewer
- Failure to successfully complete and/or pass a drug test