



Truck Security Best Practices

Prepared by IMUA's

Loss Prevention and Claims Committee

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Truck Security Best Practices

Introduction

TAPA (Transported Asset Protection Association) has developed their Trucking Security Requirements (TSR, <https://tapa.memberclicks.net/assets/docs/Standards/2014-Standards/tapa%20trucking%20security%20requirements%20-%202014.pdf>) that are designed to provide shippers with guidance when working with their trucking company partners when arranging for the transportation of high value, theft-attractive goods. While the TSR measures are quite good, we must caution that they are voluntary and are minimum standards and thus may not be adequate in all geographies and for all shipments. Our objective here is to augment what TAPA has established with steps we have found to be effective with the end result being a set of true best practices.

Please note that this paper is based on long haul, high value, full loads. Some points may not be appropriate for regional/short haul truckers.

General

The transportation service provider should furnish at least three (3) commercial shipper references.

The transportation service provider should have a satisfactory financial position (verified by CAB or similar independent firm) with enough resources to make necessary capital expenditures as well as attract and retain staff and provide training, vehicle maintenance and other business necessities.

The transportation service provider should have adequate limits of insurance (including cargo legal liability) from an insurer with an "A" or better rating per A.M. Best Company.

The transportation service provider should have experience handling high value, theft-attractive goods in the relevant lanes.

The transportation service provider should be a member in good standing of Customs and Border Protection's C-TPAT (Customs-Trade Partnership Against Terrorism) program.

The transportation service provider should have a driver turnover rate below the prevailing industry average and have no history of labor disputes or work stoppage over the past 24 months.

The transportation service provider should be able to offer dual (team) drivers and exclusive use transportation upon request.

The transportation service provider should avoid shipments late in the week that will have to layover during all or part of the weekend.

The transportation provider moving high value, theft-attractive goods in a mixed, Less than Truck Load shipment should place them in the front or nose of the trailer.

Security Management

The transportation provider should have a formally appointed person responsible for supply chain security. This person should be the dedicated point-of-contact and have enough stature in the company to be able to effectively respond to inquiries but also with the authority to make decisions on behalf of the transportation provider.

The transportation provider should have a written supply chain security policy in place; one that has openly supported by senior management. The support should be visible, vocal and validated in the form of appropriate recognition (rewards) for compliance and disciplinary action for failure to comply.

The transportation provider should have security procedures in place specific for the handling and transporting of high value theft attractive goods.

The transportation provider should not be allowed to use subcontractors unless the owner of the goods has been advised and explicitly agrees to the use of the subcontractor. If a subcontractor is used, it is the responsibility (along with the liability for failure to do so) of the transportation provider to ensure that the subcontractor adheres to all of these requirements.

The transportation provider should have a written policy involving investigation of cargo and damage incidents. This policy should spell out the responsibilities of the transportation provider to include immediate notification of any incident to the owner of the goods, and law enforcement if applicable and affirmation of full cooperation with the owner of the goods and/or their representative during the investigation.

The transportation provider should have and maintain a current list of law enforcement contacts (municipal, state and federal including local or regional taskforces) along all

lanes it transports goods. The transportation provider should have a formal procedure detailing the communication process with law enforcement in the event of an incident.

The transportation provider should maintain a copy of all shipment documentation (for example, purchase orders, dispatch records, pickup notes, bills of lading, delivery receipts with Proof of Delivery and freight bills) for at least 90 days.

The transportation provider should complete a security assessment of all lanes they use to include truck stops and rest areas along these routes with an emphasis on determining the safest passages from point-to-point. The assessments should be conducted annually or sooner when/if new intelligence becomes available. Information on cargo theft incidents is available from sources such as CargoNet, FreightWatch International and LoJack Supply Chain Integrity as well as the various Cargo Security Councils.

The transportation provider should identify safe and secure locations for their drivers to park during their mandated rest periods and overnight stays. The transportation provider should consider using their own guarded facilities or perhaps enter into cooperative ventures with competitors so they both have access to each other's terminals as needed

Employee Selection and Retention

The transportation provider should have a robust pre-employment screening process for all employees, including seasonal and contract workers, that meets those established in Part 391 of the Federal Motor Carrier Safety Regulations along with motor vehicle record and criminal background checks in all jurisdictions where the applicant has lived and worked, address, education and former employment (including explanations given for any gaps) verification as well as contact with references. Additionally, consideration should be given to a financial/credit check. Also, the transportation provider should conduct a scaled down background check (namely for driving and criminal record) every 2 years during a person's employment.

The transportation provider should require that all employees immediately report any criminal offenses/arrests to them.

The transportation provider should also conduct a search of the applicant's Driver Safety Fitness Determination that is available from the Federal Motor Carrier Safety Administration and hire only drivers with satisfactory ratings.

The transportation provider should present a written notice to all applicants (full-time, part-time, seasonal, contract, etc.) that any material misdeclaration discovered pre- or

post- hiring will result in failure to consider employment or termination of employment respectively.

The transportation provider should maintain a record of all applications denied or employees terminated for any reason and this record should be checked against all new applications.

The transportation provider should have all their employment practices, including hiring and termination procedures, checked by an appropriate independent third party (for example, an attorney) at least every 3 years or upon relevant legislative changes. Any required modifications of these procedures should be implemented as soon as practical.

Security Training

The transportation provider should include in their employee training program, a session on security that covers, among other things: physical and transportation security, static (locks, seals, vehicle immobilizers, etc.) and in-transit (hijack awareness, secure parking, tracking device technology, fraud and deception schemes etc.) cargo theft threat assessment and prevention and appropriate response protocols. This training should be conducted when a new employee is hired and then at least annually thereafter. Documentation of completion of this training should be maintained in the employee's personnel file.

The transportation provider should also have these security guidelines available to drivers in written and electronic formats.

The transportation provider should have documented procedures to safeguard cargo in emergencies such as accidents, instances when the conveyance is disabled, illness, inclement weather, delays or detours/rerouting and arrival before or after operating hours at consignee's facility or their refusal to accept the load.

Physical Security

The transportation service provider should have adequate physical security (barriers, limited/controlled access, guards, lights, surveillance cameras, etc.) at all their owned facilities where loaded trucks can be temporarily staged.

The transportation provider should ensure that the driver locks all doors while the truck is in motion and when at rest. The driver must also take the keys with them when the driver leaves the truck. The windows should be closed when the truck is moving through slow traffic or congested areas.

The transportation provider should ensure that the trailer doors are closed and secured with a high security lock or seal. Manual locks should be operated with a key (the driver must keep that key on his/her person at all times) and be designed to resist defeat for at least 10 minutes. Electronic locks should be operated from the key fob or similar device either by the driver punching in a protected password or via dispatch center or a central station. Seals, either electronic or mechanical, should be unique (numbered) and comply with ISO 17712 specifications. In addition to the required driver daily/pre-trip inspections, the transportation provider should check the door locking devices at least on a monthly basis looking for signs of tampering or damage.

The transportation provider should transport high value, theft-attractive goods in hard-sided trailers only.

The transportation provider should ensure that all power units (trucks and tractors) are secured with brake, transmission, steering joint or similar locks to prevent someone from stealing them.

The transportation provider should ensure that all dropped trailer are secured with a suitable immobilization device such as a 5th wheel or kingpin lock, landing gear lock, air brake (“gladhand”) lock or a unit activated remotely).

The transportation provider should ensure that all locking devices are equipped with high security cylinders and keyways; use keys that are not duplicable; and, are resistant to key bumping, shimming or cutting.

The transportation provider should provide emergency (“panic”) buttons that can be readily activated by the driver. These buttons can be installed (ideally in a covert but easily reachable location in the cab) or portable and able to be carried. The transportation provider should ensure the signals are effectively transmitted to the home base/dispatcher/3rd party monitoring center. The signal strength and accuracy needs to be tested at least once every 6 months.

The transportation provider should have trucks/tractors and trailers that are distinctively marked (logos) and/or painted allowing for easier identification.

Tracking Technology

The transportation provider should ensure that there is real time communication between home base/dispatcher/3rd party monitoring center and the driver on a 24 x 7 basis.

The transportation provider should have the ability to monitor the location and status of the truck/tractor and trailer in a tethered or untethered mode on a 24 x7 basis.

The transportation provider should have the ability to “geofence” the entire intended transport route, including identifying all no-stop zones such as high risk truck stops and rest areas.

The transportation provider should have a procedure in place to ensure the battery life and the operability of the tracking device are checked prior to the driver departure. The transportation provider should also ensure that there is a battery backup capable of powering the device for at least 24 hours at a reporting rate of at least once every 5 minutes.

The transportation provider should install a tracking device that is capable of utilizing at least two (2) methods of signaling, such as GPS and cellular, has at least one antennae that is covert (if the transportation provider or shipper utilizes an embedded tracking device, this requirement can be omitted); has a reporting rate of, at a minimum, every 5 minutes and has enough data storage capacity to archive information for the length of the intended transit period.. The transportation provider or the 3rd party monitoring center should have the ability to remotely change the reporting rate of the device.

Note: When an embedded tracking device is used, home base/dispatcher/3rd party monitoring center should have the capability of either continuous tracking or tracking on an alarm (as needed) basis.

The transportation provider should ensure the tracking device (s) will send a signal to the home base/dispatcher or 3rd party monitoring center in the event of unhooking of tractor from trailer, hooking up tractor and trailer, truck startup and stoppage, trailer door opening, tampering and low/off battery. The transportation provider should check the operation of the signal at least every 6 months.

The transportation provider, or a designated contractor, should monitor the tracking device on a 24 x 7 basis and have documented escalation plan and response protocol in anticipated (unhooking tractor from trailer, hooking up tractor and trailer, truck startup and stoppage, trailer door opening, etc.) or emergency (live incident notification, device tampering and battery status,) situations.

The transportation provider must test run devices along all lanes in order to identify any dead zones (areas where coverage is unavailable or limited) along the routes. Tests along existing routes should be repeated at least every 6 months and prior to the start of any new lane. The transportation provider should have a documented plan to deal with transporting goods in/through/out of these areas.

The transportation provider should request from the 3rd party monitoring center a record of all shipments in order to identify any deviations from established protocol

and/or pre-departure driver instructions. This information should be used to take corrective actions including modifying driver behavior.

Security Procedures

The transportation provider should have planned routes and stopping points for each lane as well as contingency arrangements on the most logical alternative roads should the primary ones be unusable.

The transportation provider should conduct pre-departure interviews with all drivers including, but not limited to, verification of routing, stopping points, condition and functioning of vehicle and security equipment. Any issues involving the vehicle and equipment should be resolved before the driver leaves origin; also, any en route deviations caused by traffic, weather or emergencies should be immediately reported by the driver to the home base/dispatcher/3rd party monitoring center and handled based on established procedures.

The transportation provider should ensure that the drivers remain with the vehicles at all times; at any time (scheduled or unscheduled) the driver is away from the vehicle during meal breaks or road emergencies (for example, accidents, mechanical breakdowns and medical issues), the driver must lock all doors, take all keys with them and engage (arming alarms) all security devices.

Finally, the driver should notify the home base/dispatcher/3rd party monitoring center when they leave and upon their return. The transportation provider should ensure that drivers do not stop for fuel, meals, convenience breaks or take their mandated 30-minute rest period until after they have been on the road for at least 4 hours or driven 200 miles.

The transportation provider should provide the driver with a list of approved parking/rest areas as well as “no stop” zones. This list should be reviewed at least every 6 months and updated accordingly using on site audits, feedback from drivers and other available information (trade/truck associations, law enforcement, cargo theft reporting services and other sources).

The transportation provider should prohibit drivers from allowing any unauthorized people in the truck.

The transportation provider should have a secure method to manage (inventory, assign and collect) all keys and security devices, especially the numbered security seals.

The transportation provider should keep a log of all trucks/tractors and trailers indicating their description (make/model, size and color) and identification (VIN as well

as markings on the units) along with a picture so that this information can, as needed, be transmitted to pick-up or destination personnel and law enforcement.

The transportation provider should keep a log of all drivers with their description, Commercial Driving License number along with a copy of their license so that this information can, as needed, be transmitted to pick-up or destination personnel and law enforcement.

The transportation provider should protect all shipping documents; any paperwork that would identify the shipper, consignee or the contents should be placed in a secure location during and after working hours. Any information of this type that is maintained electronically must also be protected against intentional or unintentional attack through the use of technical (firewalls, intrusion detection software, encryption) and/or nontechnical (strong passwords, one-time passwords, threat awareness training) measures.

Cargo Loading and Unloading

The transportation provider should instruct the driver to verify count and condition of the cargo during the truck loading process. The driver should make notations of damage, shortage or overage, accompanied by photographs if practical, on the shipping papers and have the shipper agree to them by legibly signing, or printing name, them as well as providing date and time. If the load is staged, made on a Shipper, Load and Count (SL &C) basis or the shipper denies the driver access to the loading process the driver should sign the shipping papers with the appropriate caveat. These documents should be maintained for at least one year.

The transportation provider should instruct the driver to verify the number and condition of any shipper applied security seal.

The transportation provider should instruct the driver to verify the condition of the lock/security seal upon arrival as well as the count and condition of the cargo once unloaded. If there is any lock/seal tampering or suspected loss or damage, the driver should immediately contact the home base/dispatcher so that a formal inspection can be arranged. If the driver is not allowed to witness the opening of the lock or breaking of the seal and unloading, the driver should make note of these conditions on the shipping papers.

The transportation provider should provide a Proof of Delivery and maintain this document for at least one year.

The transportation provider should have available, among other things, the departure time, expected arrival time, driver name, license number, truck/tractor and trailers numbers. These data should only be made available to parties with the need to know.

Other

The transportation provider should ensure that all vehicles are inspected daily by the drivers (reports are sent to the transportation provider and maintained throughout the life of the vehicle) and are maintained (these records are likewise maintained) to the OEM Preventive Maintenance schedule. The transportation provider should also retain all records of any mechanical or emergency repairs.

The transportation provider should ensure that their fleet attains a satisfactory Compliance Safety Accountability rating as compiled by the Federal Motor Carrier Safety Administration. No BASIC scores should be at or above the Intervention Threshold. Moreover, the transportation provider should not assign a driver with an unsatisfactory Safety Fitness Determination to haul any high value, theft-attractive loads.