

“Are Your Safe Deposit Procedures Ready for a Subpoena?”

For over 35 years my consulting business has taken me all over the United States presenting safe deposit workshops. When we get to the subject of written policies and procedures, invariably, in every workshop, someone asks, “Where can I find information to help me write a useful safe deposit policy and procedures manual?” This request comes so frequently that I’m sure there are more financial institutions that don’t have written policies and procedures than there are that do!

Many financial institutions have never taken the time or effort to document their internal safe deposit procedures. New employees coming into the safe deposit area are often confronted with the impossible task of remembering everything they are told in a twenty-minute training session. Or a part-time teller is simply told that “...whenever anyone comes to go in the safe deposit box, the guard key is in my top drawer.”

Most of the time management is relying on that nice lady who has worked in the safe deposit area for the past 20 years. She is expected to know everything about this department – and usually does. She is truly a valuable asset. She knows all the box renters (most by first name), can answer just about any safe deposit question and is expected to train other employees.

As Murphy’s Law predicts, if anything can go wrong it will! Generally this happens when your full time, experienced attendant is at lunch, on vacation, on sick leave, or just two days after her retirement party! All that important safe deposit knowledge and valuable customer relations retired with her.

The solution to this problem is evident. Take the time to produce and adopt an internal safe deposit policy and procedures manual. By standardizing your procedures, you will be taking steps to protect your institution. The true value of a comprehensive procedures manual can be measured in the following ways:

Liability Protection

During a safe deposit lawsuit, your procedures manual is one of the first items to be subpoenaed. If you don’t have one, the prosecuting attorney will try to prove that no one in your organization cares enough about proper procedures to document what should be done. If no written document can be produced, a jury could be easily convinced that every full-time, part-time and relief employee is making random decisions on their own.

Employee Training

New or relief employees should have a readily available source of correct safe deposit information. A well written manual serves as this reference guide as well as an internal training tool. Having up-to-date information at their fingertips should encourage employees to ask questions or look up answers when a situation arises, rather than making snap decisions when they’re not sure what to do.

Complete Information

A safe deposit manual should be written in simple, easy to understand language and comprehensive enough to answer any question an employee might have. In order to be complete, the manual should also contain a copy of your state’s regulations and all laws concerning safe deposit.

Easy to use

Making sure your manual is used, updated, and not just put on a shelf to gather dust is important. One of the worst things in a safe deposit lawsuit would be to have an aggressive prosecuting attorney cross-examine an untrained attendant asking specific procedural questions directly from your manual. If the manual is “just for show” it will be readily apparent. This lack of concern and employee knowledge will definitely be used against your organization.

Documented guidelines and required standards are essential to prove you provided the same degree of care and security that any person would provide for his own property. These standards, if written, adopted and implemented, will help you defend against any claim of negligence in a safe deposit disappearance case,

Analyze your current safe deposit operations now:

- Are your internal procedures documented in writing?
- Is everyone aware that this important information exists?
- Are new, relief, and part-time employees required to learn these procedures?
- Would you feel comfortable defending your procedures in a court of law?

In Conclusion

If you answered “no” to any or all of these questions, take the time to create, adopt and put into use a written policy and procedures manual and training program. Don’t wait until your safe deposit manual is subpoenaed in a safe deposit lawsuit and be caught empty-handed. For information on how to create this important document visit our web site at www.sdspec.com.

About the Author: David P. McGuinn, President of Safe Deposit Specialists, is a former banker and is often referred to nationwide as the safe deposit GURU. In all 50 states he has trained over 200,000 safe deposit personnel since 1969 and has served as President of the American Institute of Banking and the American, Texas and Houston Safe Deposit Associations. He has created numerous safe deposit manuals, training videos, products, compliance forms and other products. During the past 35 years, McGuinn’s safe deposit manuals, videos, products and forms have been recognized as the national standard for the financial industry.