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ID	Criteria	Implementation Guidance	Must / Should
11.1	Written processes must be in place to screen prospective employees and to periodically check current employees. Application information, such as employment history and references, must be verified prior to employment, to the extent possible and allowed under the law.	CTPAT is aware that labor and privacy laws in certain countries may not allow all of the application information to be verified. However, due diligence is expected to verify application information when permitted.	Must
11.2	<p>In accordance with applicable legal limitations, and the availability of criminal record databases, employee background screenings should be conducted. Based on the sensitivity of the position, employee vetting requirements should extend to temporary workforce and contractors. Once employed, periodic reinvestigations should be performed based on cause, and/or the sensitivity of the employee’s position.</p> <p>Employee background screening should include verification of the employee’s identity and criminal history, encompassing city, state, provincial, and country databases. CTPAT Members and their business partners should factor in the results of background checks, as permitted by local statutes, in making hiring decisions. Background checks are not limited to verification of identity and criminal records. In areas of greater risk, it may warrant more in-depth investigations.</p>		Should

ID	Criteria	Implementation Guidance	Must / Should
11.5	CTPAT Members must have an Employee Code of Conduct that includes expectations and defines acceptable behaviors. Penalties and disciplinary procedures must be included in the Code of Conduct. Employees/contractors must acknowledge that they have read and understood the Code of Conduct by signing it, and this acknowledgement must be kept in the employee's file for documentation.	A Code of Conduct helps protect your business and informs employees of expectations. Its purpose is to develop and maintain a standard of conduct that is acceptable to the company. It helps companies develop a professional image and establish a strong ethical culture. Even a small company needs to have a Code of Conduct; however, it does not need to be elaborate in design or contain complex information.	Must

**12. Education, Training and Awareness** – CTPAT’s security criteria are designed to form the basis of a layered security system. If one layer of security is overcome, another layer should prevent a security breach, or alert a company to a breach. Implementing and maintaining a layered security program needs the active participation and support of several departments and various personnel. One of the key aspects to maintaining a security program is training. Educating employees on what the threats are and how their role is important in protecting the company’s supply chain is a significant aspect to the success and endurance of a supply chain security program. Moreover, when employees understand why security procedures are in place, they are much more likely to adhere to them.

ID	Criteria	Implementation Guidance	Must / Should
12.1	<p>Members must establish and maintain a security training and awareness program to recognize and foster awareness of the security vulnerabilities to facilities, conveyances, and cargo at each point in the supply chain, which could be exploited by terrorists or contraband smugglers. The training program must be comprehensive and cover all of CTPAT’s security requirements. Personnel in sensitive positions must receive additional specialized training geared toward the responsibilities that the position holds.</p> <p>One of the key aspects of a security program is training. Employees who understand why security measures are in place are more likely to adhere to them. Security training must be provided to employees, as required, based on their functions and</p>	<p>Training topics may include protecting access controls, recognizing internal conspiracies, and reporting procedures for suspicious activities and security incidents. When possible, specialized training should include a hands-on demonstration. If a hands-on demonstration is conducted, the instructor should allow time for the students to demonstrate the process.</p> <p>For CTPAT purposes, sensitive positions include staff working directly with import/export cargo or its documentation, as well as personnel involved in controlling access to sensitive areas or equipment. Such positions include, but are not limited to, shipping, receiving, mailroom personnel, drivers, dispatch, security guards, any individuals involved in load assignments, tracking of conveyances, and/or seal controls.</p>	Must

ID	Criteria	Implementation Guidance	Must / Should
	<p>position on a regular basis, and newly hired employees must receive this training as part of their orientation/job skills training.</p> <p>Members must retain evidence of training such as training logs, sign in sheets (roster), or electronic training records. Training records should include the date of the training, names of attendees, and the topics of the training.</p>		
12.2	<p>Drivers and other personnel that conduct security and agricultural inspections of empty conveyances and Instruments of International Traffic (IIT) must be trained to inspect their conveyances/IIT for both security and agricultural purposes.</p> <p>Refresher training must be conducted periodically, as needed after an incident or security breach, or when there are changes to company procedures.</p> <p>Inspection training must include the following topics:</p> <ul style="list-style-type: none"> <li>• Signs of hidden compartments;</li> <li>• Concealed contraband in naturally occurring compartments; and</li> <li>• Signs of pest contamination.</li> </ul>		Must
12.4	CTPAT Members should have measures in place to verify that the training provided met all training objectives.	Understanding the training and being able to use that training in one's position (for sensitive employees) is of paramount importance. Exams or quizzes, a simulation exercise/drill, or regular audits of procedures etc. are some of the measures that the Member may implement to determine the effectiveness of the training.	Should



ID	Criteria	Implementation Guidance	Must / Should
12.5	Customs Brokers must be able to explain CTPAT’s security requirements to their importer clients, apprise them of critical program developments, and encourage those importers to become CTPAT Members.	The broker may create opportunities to educate the importing community on CTPAT policy and on topics where the broker has relevant expertise, which might include security procedures, best practices, access controls, documentation fraud, information security, internal conspiracies, and technologies that further the goal of a secure global supply chain. These interactions may focus on employees working in sensitive positions such as shipping, information technology, receiving, and mailroom processing.	Must
12.6	Specialized training should be provided annually to personnel who may be able to identify the warning indicators of Trade-Based Money Laundering and Terrorism Financing.	Examples of personnel who should receive this training include those responsible for trade compliance, security, procurement, finance, shipping, and receiving. Members may take into account the CTPAT Warning Indicators for Trade-Based Money Laundering and Terrorism Financing Activities document.	Should
12.8	As applicable, based on their functions and/or positions, personnel must be trained on the company's cybersecurity policies and procedures. This must include the need for employees to protect passwords/passphrases and computer access.	Quality training is important to lessen vulnerability to cyberattacks. A robust cybersecurity training program is usually one that is delivered to applicable personnel in a formal setting rather than simply through emails or memos.	Must
12.9	Personnel operating and managing security technology systems must receive operations and maintenance training in their specific areas. Prior experience with similar systems is acceptable. Self-training via operational manuals and other methods is acceptable.		Must
12.10	Personnel must be trained on how to report security incidents and suspicious activities.	Procedures to report security incidents or suspicious activity are extremely important aspects of a security program. Training on how to report an incident can be included in the overall security training. Specialized training modules (based on job duties) may have more detailed training on reporting procedures, including specifics on the process, such as, what to report, to whom, how to report the incident, and what to do after the report is completed.	Must

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