



NSI code of practice for the management and operation of cash centres

NCP 106.3

Mar 2020

National Security Inspectorate
Sentinel House,
5 Reform Road
Maidenhead
SL6 8BY
Website: [nsi.org.uk](https://www.nsi.org.uk)

This Code of Practice is to be read in conjunction with the NSI Regulations relating to approval by NSI and the NSI Criteria for approval. No company shall hold out or claim that it adheres to this Code, save by virtue of holding NSI approval, or having obtained the written permission of NSI.

<i>Document no.</i>	NCP 106	<i>Document issue no.</i>	3	<i>Document issue date</i>	March 2020
<i>Document owner</i>	Head of Field Operations (Services)			<i>Last review date</i>	March 2020
<i>Document classification</i>	PUBLIC (RESTRICTED)			Page 2 of 17	

Contents

1	Scope.....	5
2	Normative references.....	5
3	Terms and definitions.....	5
4	Organisation	6
4.1	Structure	6
4.2	Finances.....	6
4.3	Insurance	6
4.4	Secure premises.....	7
4.5	Security procedures	8
4.6	Facilities and equipment.....	8
5	Cash centre operations.....	10
5.1	Contracts	10
5.2	Cash centre opening.....	10
5.3	Daily operations – process control	11
5.4	Daily operations – access control.....	12
5.5	Daily operations – financial control.....	12
5.6	Cash centre closing	12
5.7	Documentation.....	13
5.8	Business continuity.....	13
5.9	Money laundering	13
6	Personnel	13
6.1	Selection and screening	13
6.2	Terms of employment.....	14
6.3	Identification	14
7	Training.....	15
7.1	General.....	15
7.2	Induction training	15
7.3	Training.....	15
7.4	Performance monitoring	16
7.5	Training records.....	16
8	Bibliography.....	17

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 3 of 17	

Foreword

In the absence of any specific British Standard or other publicly available code of practice, this code of practice has been developed by the National Security Inspectorate (NSI) to provide requirements for the operation and management of a cash centre providing services to the banking and cash and valuables in-transit sectors.

This code of practice acts both as a means of advising such organisations of the NSI approval criteria and to form a consistent basis for auditing all aspects of these services.

No organisation shall hold out or claim that it adheres to this code of practice unless compliance with the same has been confirmed by NSI and approval granted.

Note: Where any person engages in a licensable activity as designated in the Private Security Industry Act 2001 that person has to be licensed in accordance with that Act. It is an offence to engage in licensable activity without a licence or a licence dispensation notice. The Act can be found online at <http://www.the-sia.org.uk>

This code of practice has been produced by a technical committee convened by the NSI Manned Services Sector Committee and is endorsed by the NSI Management Board. NSI wishes to acknowledge and thank the various organisations consulted on the technical committee for their assistance in the preparation of this code of practice.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 4 of 17	

1 Scope

This code of practice specifies requirements for the operation and management of a cash centre that must be satisfied by organisations that wish to obtain and maintain NSI approval as a cash centre.

This code of practice is applicable to a cash centre providing dedicated cash services not already covered within cash and valuables in-transit contracts in accordance with BS 7872.

2 Normative references

The following documents are referenced in this code of practice.

For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

<i>BS 7858</i>	<i>Security screening of individuals employed in a security environment – Code of practice</i>
<i>BS 7872</i>	<i>Manned security services – Cash in-transit services (collection and delivery) Code of practice</i>
<i>ISO 9001</i>	<i>Quality management systems – requirements</i>
<i>ISO 10002</i>	<i>Quality management – Customer satisfaction – guidelines for complaints handling in organisations</i>

3 Terms and definitions

For the purposes of this code of practice, the following terms and definitions apply:

- 3.1 Cash centre services:** Services provided by an organisation for receipt, counting, processing, sorting, vaulting, storage, packaging, repatriation, banking, and despatch of cash, coin and other valuables, within secure premises.
- 3.2 Cash centre:** Dedicated secure area within secure premises within which cash centre services are provided.
- 3.3 Customer:** Individual or organisation that utilises a cash centre to carry out agreed services.
- 3.4 Control room:** Area from which the operation of the secure premises is controlled.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 5 of 17	

4 Organisation

4.1 Structure

4.1.1 The organisation shall have a management structure showing control and accountability at each level of operation.

4.1.2 The organisation shall operate a complaints management system. (For an organisation with a quality management system that complies with ISO 9001, the relevant clauses on complaints management shall be met.)

Note: Further guidance on complaints management systems can be found in BS ISO 10002.

4.1.3 The organisation shall comply with all current and relevant legislation.

4.1.4 Details of the ownership of the organisation shall be evident and individuals having a significant shareholding shall be identifiable.

4.1.5 The curriculum vitae of each principal or director of the organisation shall be available on request.

4.1.6 Any unspent criminal convictions or un-discharged bankruptcy of a principal or director shall be disclosed on request.

Note: Attention is drawn to the Rehabilitation of Offenders Act 1974, whose provisions govern such disclosure.

4.2 Finances

4.2.1 The organisation shall have sufficient working capital for its requirements. The capital reserves of the organisation shall be sufficient for current and planned needs.

4.2.2 The organisation shall be able to present two years' audited trading accounts, unless it is starting business as a subsidiary of an established organisation, or is a new organisation whose managers are experienced in the field of cash centre management and have substantial financial backing.

4.2.3 The organisation shall be prepared to submit its annual accounts to relevant interested parties for examination.

4.3 Insurance

4.3.1 The organisation shall possess public, contractual, efficacy and employer liability insurance cover at a level commensurate with the nature of the business undertaking and the number of persons employed.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 6 of 17	

- 4.3.2 Fidelity guarantee shall be available and the limit of the insurer's liability shall be confirmed for special risks of the industry, e.g. loss of cash or other valuables, loss of keys and product liability.

4.4 Secure premises

- 4.4.1 The secure premises and the level of security provided shall be appropriate in the opinion of the organisation to the type of cash centre services being provided, and to the associated security risks as perceived and assessed by the organisation.
- 4.4.2 The organisation shall document the security risk assessment which shall form the basis for the organisation's judgements and decisions about the suitability of the secure premises and about the level of security provided.
- 4.4.3 Consideration shall be given to the incorporation of layered security within the cash centre.
- 4.4.4 If stakeholders such as customers, banks or insurers have declared to the organisation any security risk factors (or other requirements relevant to security risk assessment), the organisation shall take account of these security risk factors (and other requirements) and shall ensure that they are met.
- 4.4.5 When making its security risk assessment, the organisation shall have regard to the need to ensure the physical security, safety and integrity of its employees and its stored valuables.
- 4.4.6 When making its security risk assessment, the organisation shall endeavour to identify all known forms of attack¹. The organisation shall consider all the forms of attack that it has identified, and using a security risk assessment methodology shall decide which of the identified forms of attack the cash centre is intended to be secure against. The organisation shall document the intended level or extent of protection against the various forms of attack. If the likelihood of some of the identified forms of attack is judged by the organisation to be so minimal that protection against them is not appropriate (or that only a low level of protection against them is considered appropriate), the organisation's security risk assessment shall clearly indicate this.

¹ This code of practice is written with normal (peacetime) circumstances in view. An exception, therefore, is that forms of attack that occur only in time of war need not be identified or considered unless a stakeholder has explicitly declared that the cash centre is required to remain secure under such special circumstances. However, this exception does not remove the need to identify and consider attack by criminal gangs using means such as firearms, arson, or firing shells from a mortar.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 7 of 17	

- 4.4.7 The cash centre, and immediate surrounding areas, shall be constructed to reasonably protect from all known forms of attack and to ensure physical security, safety and integrity of its employees and its stored valuables. Consideration shall be given to the incorporation of layered security within the cash centre.
- 4.4.8 The control room shall be within the secure area of the cash centre, or within an equally secure area of the organisation.
- 4.4.9 The control room shall maintain processes to manage:
- a) vehicle access to ensure that only authorised vehicles gain entry;
 - b) access for personnel to ensure that only authorised personnel gain entry;
 - c) internal access and internal movements;
 - d) transfer of consignments; and
 - e) CCTV monitoring of the secure premises, all access points, and immediate surrounding areas.
- 4.4.10 The organisation shall have an administrative office and/or secure premises where records, together with all professional and business documents, files, etc. necessary to the proper conduct of business transactions are kept.
- 4.4.11 A minimum period shall be defined for the retention of all data and records, which is acceptable to all stakeholders.

4.5 Security procedures

- 4.5.1 The organisation shall establish and maintain documented procedures detailing all the security arrangements and processes that apply to the operation of the cash centre. Such security procedures shall be developed in accordance with the perceived risk and sufficient to satisfy relevant stakeholders.
- 4.5.2 All procedures and processes established to address the requirements of this code of practice shall be included within the security procedures.
- 4.5.3 Security procedures should detail the appropriate course of action to deal with hostage, kidnap or similar situations.

4.6 Facilities and equipment

- 4.6.1 A deliberately-operated hold-up alarm system shall be installed in the cash centre, with sufficient hold-up devices to allow the cash centre staff to give warning of any attack on the cash centre. This shall transmit an alarm signal to an alarm receiving centre.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 8 of 17	

- 4.6.2 In addition, a 24-hour automatic alarm system shall be installed in the cash centre, including its vaults. This shall automatically transmit an alarm signal to an alarm receiving centre in the event of an attack on the cash centre, or its vaults, during close-down periods.
- 4.6.3 The alarm receiving centre used shall not be combined with, or adjacent to, the cash centre.
- 4.6.4 All alarm systems shall be maintained and regularly tested in accordance with the manufacturer's instructions. Maintenance and test records shall be retained (see 4.4.10).
- 4.6.5 The cash centre shall possess CCTV systems that monitor:
- a) all entry/exit points into the cash centre, its secure premises and car parks;
 - b) other vulnerable areas, e.g. roofs, adjacent passages, perimeter fences, etc.;
 - c) work benches on the processing floor, particularly those where discrepancies may occur;
 - d) vaults and vault doors/access;
 - e) strategic passages within the cash centre;
 - f) storage areas, e.g. for cages; and
 - g) secure yard area, van bays and van bay doors.
- 4.6.6 All data from cameras shall be recorded and retained (see 4.4.10).
- 4.6.7 Emergency lighting, capable of illuminating the control room, vault areas, processing floor and emergency passages, shall be provided. The emergency lighting system shall operate within 60 seconds of a mains power failure and shall maintain illumination for at least 30 minutes to allow evacuation of the cash centre.
- 4.6.8 Equipment, furnishings and general layout of the cash centre shall be consistent with its efficient operations. Heating, lighting, and ventilation shall be provided to ensure a reasonable working environment.
- 4.6.9 Adequate means of evacuation shall be built into the cash centre.
- 4.6.10 Adequate first aid and firefighting equipment shall be provided, and appropriate training given.
- 4.6.11 Sufficient equipment shall be deployed in the cash centre to ensure its efficient and effective running. The following list shall be considered as a minimum:
- a) note counting equipment;
 - b) coin counting equipment;
 - c) weighing equipment;

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 9 of 17	

- d) pallet trucks;
- e) cages;
- f) trays; and
- g) banding machines.

4.6.12 Equipment deployed shall be adequately calibrated and maintained, as appropriate. Calibration and maintenance records shall be retained (see 4.4.10). Counting equipment should be capable of detecting counterfeit notes.

5 Cash centre operations

5.1 Contracts

- 5.1.1 A clear written contract between the organisation and its customers shall be drawn up and signed by both parties.
- 5.1.2 The contract shall give the terms and conditions on which work is to be undertaken and shall indicate the insured liabilities of the organisation, which shall not be unlimited, other than required by law.
- 5.1.3 The contract shall normally be agreed and exchanged before work commences, or, in urgent cases, as soon as is practicable thereafter.
- 5.1.4 Copies of all contracts shall be retained (see 4.4.10).
- 5.1.5 Information received whilst tendering for any contracts shall be kept permanently confidential.
- 5.1.6 Any alterations to the contract which results in a change of operational requirements shall be endorsed by the organisation and the customer.
- 5.1.7 Where the agreed cash centre services include processing or consolidation of cash and subsequent banking on behalf of the customer, there shall be agreement on the reporting of any discrepancies or failure to balance. It shall be clear whether discrepancies above a specified value have to be immediately reported to the customer.

5.2 Cash centre opening

- 5.2.1 Where the cash centre does not operate on a twenty-four hour, seven days a week basis, it shall be opened in such a manner as to maximise the safety of personnel carrying out the opening process and ensure minimum risks to contents held within the cash centre.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 10 of 17	

5.2.2 A documented procedure shall be established, outlining the opening process. The following points shall be addressed:

- a) the number of personnel to be involved with the opening process, which shall be based upon an appropriately documented risk assessment and the level of monitoring provided by the installed security systems;
- b) team communication with each other and the methods for summoning assistance if under duress or attack;
- c) vault key or combination holders shall not normally be members of the opening team;
- d) visual checks shall be performed immediately prior to opening to confirm that:
 - 1) there are no signs of a break-in or breach of the secure premises;
 - 2) perimeter fences appear intact;
 - 3) no alarm activation in evidence;
 - 4) no suspicious vehicles / people are in the immediate area of the secure premises;
- e) actions to be taken when the visual checks indicate suspicious activity; and
- f) the process for physical entry.

5.3 Daily operations – process control

5.3.1 The organisation shall have in place adequate and clearly defined processes to cover:

- a) receipt of inward consignments;
- b) processing of inward consignments and dealing with all known nonconformities or discrepancies;
- c) receiving and processing bulk consignments;
- d) preparing bulk consignments;
- e) processing of outward consignments;
- f) despatch of outward consignments; and
- g) vaulting and storage.

5.3.2 All processes outlined in 5.3.1 shall be carried out:

- a) with sufficient management controls or checks in place to safeguard the personnel and the cash or valuables being processed, particularly at such

<i>Document no.</i>	NCP 106	<i>Document issue no.</i>	3	<i>Document issue date</i>	March 2020
<i>Document owner</i>	Head of Field Operations (Services)			<i>Last review date</i>	March 2020
<i>Document classification</i>	PUBLIC (RESTRICTED)			Page 11 of 17	

points where transactions may not initially balance; controls could include dual presence, dual control, and/or CCTV; and

- b) ensuring all transactions and all movements of valuables between individuals are receipted. There shall always be an audit trail when consignments are passed from one function/area/individual to another.

5.4 Daily operations – access control

- 5.4.1 The organisation shall have in place adequate and clearly defined processes to cover access to, and egress from, the cash centre during operational and non-operational periods.
- 5.4.2 These processes shall apply to all employees and all visitors. Notification of expected arrival shall be a requirement for all visitors and for the organisation's employees who do not have the cash centre as their normal place of work.

5.5 Daily operations – financial control

- 5.5.1 The organisation shall have in place adequate and clearly defined processes to cover all financial transactions.

5.6 Cash centre closing

- 5.6.1 The cash centre shall be closed in such a manner as to maximise the safety of personnel carrying out the closing task and ensure minimum risk to contents held within the cash centre.
- 5.6.2 A documented procedure shall be established, outlining the closing process. The following points shall be addressed:
 - Closing team to comprise of at least two members of staff.
 - Adequate means of communication.
 - Vault key and combination holders shall normally have vacated the cash centre prior to the closing process starting.
 - The closing team shall ensure that all areas have been searched and secured in line with security procedures.
 - Actions to be taken when suspicious activity is suspected.
 - Exit from the cash centre in line with security procedures.

<i>Document no.</i>	NCP 106	<i>Document issue no.</i>	3	<i>Document issue date</i>	March 2020
<i>Document owner</i>	Head of Field Operations (Services)			<i>Last review date</i>	March 2020
<i>Document classification</i>	PUBLIC (RESTRICTED)			Page 12 of 17	

5.7 Documentation

- 5.7.1 The organisation shall maintain a system of document control for all areas affecting security and customer service. This shall ensure that all documentation relating to working practices, forms and processes is current and issued to all relevant personnel.

5.8 Business continuity

- 5.8.1 Adequate business continuity plans shall be established, documented and periodically tested. Records of tests shall be retained (see 4.4.10).

5.9 Money laundering

- 5.9.1 Cash centre staff shall be made aware of their roles and responsibilities regarding money laundering, these being:
- a) to be vigilant (i.e. size of deposits consistent with type of business);
 - b) to understand what has to be done in the case of a suspicious deposit or sale.

Note: Attention is drawn to the fact that the organisation must ensure that it fulfils its legal obligations as outlined in the 'Money Laundering and Terrorist Financing (amendment) Regulations 2019'.

6 Personnel

6.1 Selection and screening

- 6.1.1 The organisation shall make full pre-employment enquiries to ensure that only suitably qualified persons are recruited. The selection procedure shall be designed to assess the suitability for cash centre duties. The selection and screening shall include a personal interview.
- 6.1.2 All personnel involved in cash centre duties, or having access to details of cash centre duties, shall be screened in accordance with BS 7858.
- 6.1.3 Where employment is on an occasional, part-time or agency basis, pre-employment checks shall be of no lesser standard than the procedures adopted in respect of full-time employees.
- 6.1.4 A person who is subject to work permit controls shall be required to produce at the personal interview a valid work permit, and a record of this shall be entered on their file.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 13 of 17	

- 6.1.5 If employees are acquired through a takeover, the organisation shall satisfy itself that the recommendations of this sub-clause (6.1) have been fully met.

6.2 Terms of employment

- 6.2.1 All employees shall receive a clear, concise and unambiguous contract of employment. For agency staff the contract may be with the recruiting agency.

Note: Attention is drawn to the provisions of the *Employment Protection Act 1975*.

- 6.2.2 Employees shall not be required to work abnormally long hours to the detriment of health and efficiency.
- 6.2.3 Where night-time working is involved, employees shall be asked to confirm that there is nothing in their circumstances that would be detrimental to their working nightshifts.
- 6.2.4 Employees shall be required to maintain proper standards of appearance whilst at work.
- 6.2.5 Employees shall be advised that any breach of the organisation's security procedures shall be regarded as a breach of their terms and conditions of employment.
- 6.2.6 Employees shall be required to sign for all personally issued equipment and uniform (where provided) and to give an undertaking to return these on termination of their employment.

6.3 Identification

- 6.3.1 Employees shall be issued with a photographic identity card confirming their position with the organisation. Identity cards shall be carried at all times while on duty, and where required by the organisation's security procedures.
- 6.3.2 The organisation shall ensure that the identity card for each employee is periodically renewed. Each identity card shall be uniquely numbered and include the following information:
- a) organisation name and address;
 - b) employee name, photograph, signature and employee number;
 - c) expiry date.
- 6.3.3 The expiry date shall be not more than three years from the date of issue.
- 6.3.4 There shall be formal arrangements for the withdrawal or cancellation of the identity card of an employee who is leaving the organisation's employment.
- 6.3.5 Where an organisation chooses not to operate a photographic identity card system, equally robust procedures for identification shall be established and maintained.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 14 of 17	

7 Training

7.1 General

- 7.1.1 The organisation shall have a clearly defined and documented training policy. It shall cover the items identified in 7.2 to 7.4.
- 7.1.2 Each organisation shall maintain a register of those persons who are suitably competent for the training, assessment and performance review of employees.

7.2 Induction training

- 7.2.1 The organisation shall provide induction training before commencement of duties in such matters as conditions of employment, security, and health and safety.

7.3 Training

- 7.3.1 Training shall be provided for all employees engaged in cash centre duties, whether full-time, part-time or agency.
- 7.3.2 Where an employee returns to work after a leave of absence of more than 3 months, their training requirements shall be assessed and, if necessary, retraining provided in accordance with the minimum standards set by the organisation.

Note: Existing employees transferring to new duties need only receive training in those areas not covered previously, and on any special areas of performance.

- 7.3.3 Training shall conform to a specified minimum standard, which shall include:
- a) equipment;
 - b) type and scope of work;
 - c) principles of security and the security procedures (4.5), as appropriate;
 - d) procedures dealing with hostage, kidnap or similar situations;
 - e) vigilance and observation techniques;
 - f) operational procedures;
 - g) emergency procedures;
 - h) communication;
 - i) customer care;
 - j) health and safety; and
 - k) manual handling.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 15 of 17	

- 7.3.4 Where applicable, training shall be in accordance with existing National Occupational Standards for Cash Processing Operations.
- 7.3.5 While it is recognized that some parts of the training programme may be best undertaken by managers and specialists who are not qualified trainers, it is essential that people delivering the training be competent in instructional techniques.
- 7.3.6 Training shall be delivered in an environment conducive to effective learning.
- 7.3.7 The organisation shall be satisfied that the training has been successfully completed.

7.4 Performance monitoring

- 7.4.1 Performance of staff shall be assessed against defined standards, by a member of the management team or by another suitably qualified person.
- 7.4.2 A record of achievement against the defined performance standards shall be prepared for new employees. This shall be issued to the new member of staff and used by a member of the management team or other suitable qualified person for assessment.
- 7.4.3 The new member of staff shall satisfy the member of the management team or other suitably qualified person, that each aspect of performance has been consistently achieved. Both parties shall then sign the record against each applicable aspect of performance. This shall be initially completed within three months of appointment and periodically reviewed.
- 7.4.4 Organisations shall provide appropriate refresher training according to the minimum standards set by the organisation. In addition to any identified organisation needs, the following subjects shall be included in any training provided:
 - a) health and safety;
 - b) principles of security and the security procedures (4.5), as appropriate; and
 - c) emergency procedures.

7.5 Training records

- 7.5.1 Records shall be kept for all elements of training, showing the dates when individuals were trained, the programme of study undertaken, and the trainer(s) involved.
- 7.5.2 Records shall be signed by both the employee and the trainer, at the time training is delivered.

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 16 of 17	

8 Bibliography

The Money Laundering and Terrorist Financing (amendment) Regulations 2019

Private Security Industry Act 2001

Rehabilitation of Offenders Act 1974

Employment Protection Act 1975

Document no.	NCP 106	Document issue no.	3	Document issue date	March 2020
Document owner	Head of Field Operations (Services)			Last review date	March 2020
Document classification	PUBLIC (RESTRICTED)			Page 17 of 17	