



Compliance Hub - Question of the Week:

Q: Is there any sort of script that the bank could follow when dealing with the media after a robbery or other related security incident?

A: At a high level, the types of responses the bank would craft in dealing with the media in the wake of such an event would typically be tailored by public relations specialists, either internally (often the marketing team) or externally (e.g., a PR firm).

However, with that said, from a federal regulatory perspective: under 12 CFR 208.61, the bank's security procedures - in maintaining records aimed to assist in identifying persons committing crimes (including robbery) against the institution and that will preserve evidence that may aid in their identification and prosecution, and with periodically training officers and employees in proper employee conduct during and after a robbery - may broadly contain appropriate steps in how the bank should approach law enforcement, which in turn may inform how the bank would respond to the media.

In looking at some of the national bank security consultants' general recommendations, (and, though not directly related to the action a bank would take, the DOJ's [Media Relations Manual](#) in light of crimes such as bank robberies) it may be appropriate for the bank to first consult with law enforcement prior to releasing any information, and then issuing a statement regarding the steps being taken by the bank or regarding the continued safety of the bank.

Our [Adverse Media Screening \(Negative News\) Tools](#) - though more focused on the bank's screening for negative news in prospective customers / employees / third-party relationships - do contain associated principles regarding identifying and assessing the potential risks related to criminal activity, and the possible mitigation of those risks.

And, as always, our [Review Team](#) is always available to review materials from our members, including a draft of the script of these media responses, to ensure that they are in line with the applicable federal regulations and best practice recommendations, as well.