

Draft
Code of Practice

**MANAGING SECURITY RISKS IN
THE CASH-IN-TRANSIT
INDUSTRY**

Draft for Public Comment

This draft model Code of Practice for *Managing Security Risks in the Cash-in-Transit Industry* has been developed to support the model Work Health and Safety (WHS) Act and Regulations developed by Safe Work Australia under the *Intergovernmental Agreement for Regulatory and Operational Reform in Occupational Health and Safety*.

Since 1 January 2012, six jurisdictions have implemented new WHS laws based on the model WHS laws: Queensland, New South Wales, Tasmania (with a commencement date of 1 January 2013), the Northern Territory, the Australian Capital Territory and the Commonwealth.

This Code of Practice provides practical guidance for businesses that conduct cash-in-transit activities as well as those using these services on how to manage the security risks that may affect health and safety of workers and others. It is based on codes of practice that were previously developed by New South Wales, Queensland, the Commonwealth and the Australian Capital Territory and Victoria's guidance material. Broader material from South Australia, Northern Territory and Western Australia covering the security industry, violence in the workplace, and armed hold-ups has also been taken into consideration.

Feedback is sought on whether the scope and application of this Code is appropriate including whether it:

- should only focus on security risks
- is helpful and easy to understand
- reflects current state of knowledge and technological developments in relation to managing the risks associated with cash-in-transit
- has an appropriate level of information or is too detailed including whether the information would be better dealt with in specific guidance
- requires additional examples or case studies to provide clarification. Where possible, please provide relevant examples and case studies that you think should be included.

This Code has been developed to reflect the requirements of the model WHS Regulations and it includes references to specific regulations. Comments should not focus on the regulations themselves, but on the guidance that is needed to comply with the WHS Regulations.

How do you make a submission?

You can provide your comments as an individual or you may wish to contribute to a joint submission through your employer or union organisation, professional association, safety group or community forum. It is encouraged that wherever possible, you should include evidence and examples to support your views on the draft model code.

A Public Comment Submission Cover Sheet and the Public Comment Response Form are provided for making written submissions. These are available on the Safe Work Australia website at www.safeworkaustralia.gov.au.

It is preferred that submissions are typed and submitted electronically to the following email address: codes@safeworkaustralia.gov.au. If you are unable to email your submission, you can post it to:

Safe Work Australia
Attn: Codes Public Comment
PO Box 641
Canberra ACT 2601

When a submission is received by Safe Work Australia via email, an automatic response will be sent to confirm receipt. We do not send individual responses to submissions received by mail.

All submissions will be made accessible to the public on the Safe Work Australia website, unless marked 'IN CONFIDENCE'.

The closing date for making a submission is **Friday 24 August 5:00 pm AEST**.

What happens after the public comment period closes?

Safe Work Australia will analyse all written submissions that are received during the public comment period. Safe Work Australia will review and as necessary revise the model Codes of Practice.

The revised model Codes of Practice will then be considered by the Ministerial Council for adoption as part of the harmonised WHS laws.

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FOREWORD

This Code of Practice on managing security risks associated with cash-in-transit is an approved code of practice under section 274 of the Work Health and Safety (WHS) Act.

An approved code of practice is a practical guide to achieving the standards of health, safety and welfare required under the model WHS Act and the model Work Health and Safety Regulations (the WHS Regulations).

A code of practice applies to anyone who has a duty of care in the circumstances described in the code. In most cases, following an approved code of practice would achieve compliance with the health and safety duties in the WHS Act, in relation to the subject matter of the code. Like regulations, codes of practice deal with particular issues and do not cover all hazards or risks which may arise. The health and safety duties require duty holders to consider all risks associated with work, not only those for which regulations and codes of practice exist.

Codes of practice are admissible in court proceedings under the WHS Act and Regulations. Courts may regard a code of practice as evidence of what is known about a hazard, risk or control and may rely on the code in determining what is reasonably practicable in the circumstances to which this Code of Practice relates.

Compliance with the WHS Act and Regulations may be achieved by following another method, such as a technical or an industry standard, if it provides an equivalent or higher standard of work health and safety than the code.

An inspector may refer to an approved code of practice when issuing an improvement or prohibition notice.

This Code of Practice has been developed by Safe Work Australia as a model code of practice under the Council of Australian Governments' Inter-Governmental Agreement for Regulatory and Operational Reform in Occupational Health and Safety for adoption by the Commonwealth, state and territory governments.

A draft of this Code was released for public consultation on 8 June 2012 and was endorsed by the Select Council for Workplace Relations on [to be completed].

SCOPE AND APPLICATION

This Code provides practical guidance for persons conducting a business or undertaking involved in the carrying or transporting of money and other valuables on how to manage health and safety risks associated with potential illegal activities, such as robberies and armed hold-ups. It is also relevant for businesses who use these services e.g. banks and retailers, as well as designers of workplaces.

This Code is not focussed on the 'in-house' transport of cash within a business. This Code does not cover other legislation related to cash-in-transit activities such as legislation for firearms, security, public health and road transport.

How to use this code of practice

In providing guidance, the word 'should' is used in this Code to indicate a recommended course of action, while 'may' is used to indicate an optional course of action.

This Code also includes various references to provisions of the WHS Act and Regulations which set out the legal requirements. These references are not exhaustive. The words

'must', 'requires' or 'mandatory' indicate that a legal requirement exists and must be complied with.

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1. INTRODUCTION

1.1 What is cash-in-transit?

Cash-in-transit activities involve the transport of money, jewels, bullion, securities and other financial instruments by workers. Transport can take place using armoured or non-armoured vehicles. Activities include:

- an escort service where the cash is safeguarded in the course of transportation
- work performed in relation to the servicing or maintenance of automatic teller machines (ATMs) or equivalent technology
- management, secretarial or administrative tasks related to these activities.

The business of transporting cash and valuables gives rise to the risk of armed robbery. Consultation, co-operation and co-ordination of activities between businesses transporting cash as well as those using the service is essential to protect the health and safety of workers and members of the public so far as is reasonably practicable.

1.2 Who has health and safety duties in relation to cash-in-transit activities?

A person conducting a business or undertaking has the primary duty under the WHS Act to ensure, so far as is reasonably practicable, that workers and other persons are not exposed to health and safety risks arising from the business or undertaking. This duty includes providing and maintaining a work environment that is without risks to health and safety. These duties are owed by businesses who carry out cash-in-transit activities (referred to as operators) as well as those that use the services (referred to as clients).

For example, a client, such as a financial institution, has a duty to manage the risk of armed robberies occurring when deciding on the location of ATMs and the method by which cash collections or deliveries are carried out on their premises. An operator has a duty to ensure that their workers (including any contractors they engage) can carry out the work safely.

The WHS Regulations include more specific requirements for businesses and undertakings to manage risks that are relevant to cash-in-transit activities, such as hazardous manual tasks and remote and isolated work.

Designers, manufacturers, importers and suppliers of plant or structures used in cash-in-transit activities must ensure, so far as is reasonably practicable, that the plant or structure is designed, manufactured, imported, or supplied without risks to health and safety. Designers of buildings and designers of plant (such as armoured vehicles and ATMs) have an important role in eliminating or minimising the risk of armed robbery and should consult with cash-in-transit operators and clients in meeting their duty.

Officers, including company directors, have a duty to exercise due diligence to ensure that the business or undertaking complies with the WHS Act and Regulations. This includes taking reasonable steps to ensure that the business or undertaking has and uses appropriate resources and processes to eliminate or minimise risks that arise from cash-in-transit activities.

Workers have a duty to take reasonable care for their own health and safety and that they do not adversely affect the health and safety of other persons. Workers must comply with any reasonable instruction and cooperate with any reasonable policy or procedure relating to health and safety at the workplace. If personal protective equipment (PPE) is provided by the business or undertaking, the worker must use it in accordance with the information, instruction and training provided.

Other persons at the workplace, such as visitors, must take reasonable care for their own health and safety and must not adversely affect the health and safety of other persons. They must comply, so far as they are reasonably able, with any reasonable instruction given by the person conducting the business or undertaking to allow that person to comply with the WHS Act.

1.3 What is involved in managing the risks associated with cash-in-transit?

R. 34-38: In order to manage risk under the WHS Regulations, a duty holder must:

- identify reasonably foreseeable hazards that could give rise to the risk
- eliminate the risk so far as is reasonably practicable
- if it is not reasonably practicable to eliminate the risk, minimise the risk so far as is reasonably practicable by implementing control measures in accordance with the hierarchy of control
- maintain the implemented control measure so that it remains effective, and
- review, and if necessary revise, risk control measures so as to maintain, so far as is reasonably practicable, a work environment that is without risks to health and safety.

Chapter 2 of this Code provides guidance on how to manage the risks associated with cash-in-transit activities by following a systematic process that involves:

- identifying hazards
- if necessary, assessing the risks associated with these hazards
- implementing and maintaining risk control measures, and
- reviewing risk control measures.

Guidance on the general risk management process is available in the *Code of Practice: How to Manage Work Health and Safety Risks*.

Consulting your workers

S. 47: The WHS Act requires that you consult, so far as is reasonably practicable, with workers who carry out work for you who are (or are likely to be) directly affected by a work health and safety matter.

S. 48: If the workers are represented by a health and safety representative, the consultation must involve that representative.

Consultation involves sharing information, giving workers a reasonable opportunity to express views and taking those views into account before making decisions on health and safety matters.

Consultation with workers and their health and safety representatives is required at each step of the risk management process. By drawing on the experience, knowledge and ideas of your workers you are more likely to identify all hazards and choose effective control measures.

Consulting, cooperating and coordinating activities with other duty holders

S. 46: Where more than one person has a duty in relation to the same matter, each person with the duty must, so far as is reasonably practicable, consult, cooperate and coordinate activities with all other persons who have a work health and safety duty in relation to the same matter.

Cash-in-transit activities will usually involve more than one business or undertaking who will each have health and safety duties to the extent of their ability to influence and control various aspects of health and safety related to the cash-in-transit activity. In these situations, the duty holders should exchange information regarding the hazards and risks

and work together in a cooperative and coordinated way to eliminate or minimise the risks. An example of how this can work is provided below.

A financial institution (the client) located in a shopping centre engages ABC Security to transport cash to and from its premises, including the ATMs. ABC Security engages a contractor to transport the cash.

The client, ABC Security and the shopping centre management meet to assess the risks associated with the workplace, including access, parking and location of pick-up points. They decide on what each will do to control the risks and discuss the emergency plans that the client and shopping centre have in place to deal with potential armed hold-ups.

ABC Security provides all relevant information to the contractor and finds out how the contractor will manage health and safety risks arising from the work. The contractor provides written copies of their safe work procedures for the job. ABC Security and the contractor agree on arrangements for any training that workers transporting cash may need, as well as supervision and monitoring to ensure safe work procedures are being followed.

Further guidance on consultation requirements is available in the *Code of Practice: Work Health and Safety Consultation, Cooperation and Coordination*.

2. RISK MANAGEMENT

2.1 Identifying the hazards

Identifying hazards in the workplace involves finding things and situations that could potentially cause harm to people.

Hazards associated with cash-in-transit activities can include:

- robberies and armed hold-ups
- worker fatigue and stress
- manual tasks
- exposure to temperature variations
- traffic hazards
- slips, trips and falls
- use of firearms.

Hazards may arise from:

- work practices and systems of work
- transport such as driving, escort, pick-up and deliveries
- security, parking, facilities and lighting at client work sites
- traffic and pedestrians at the site
- entries and exits to a work site.

Potential hazards may be identified in a number of ways, including:

- inspecting the client work sites
- inspecting vehicles and equipment
- observing the systems of work and work practices
- assessing the routes for cash-in-transit transfers
- talking to workers about any problems they have noticed
- reviewing incident, injury and dangerous occurrence reports (e.g. hold ups)
- determining the levels of training, experience and competence for the tasks.

2.2 Assessing the risks

A risk assessment involves considering what could happen if someone is exposed to a hazard and the likelihood of it happening. A risk assessment can help you determine:

- how severe a risk is
- whether existing control measures are effective
- what action you should take to control the risk
- how urgently the action needs to be taken.

If you already know the risk and how to control it effectively, a risk assessment is unnecessary.

Factors to consider when assessing risks arising from cash-in-transit activities include:

- whether the activity is overt (i.e. the transport of valuables in a marked vehicle by uniformed, armed/unarmed workers) or covert (i.e. the transport of valuables in an unmarked vehicle by non-uniformed, armed/unarmed workers)
- the regularity of the client runs

- the time of the work and periods of peak traffic
- the amount of cash and the weight in each transfer
- the types of work being performed (e.g. patrol)
- how many people are exposed (e.g. crew levels and public activity)
- adequacy of communication systems such as back to base radio mobile phones
- the suitability and condition of the vehicles (e.g. armoured or non-armoured) and equipment for the activity (e.g. PPE and firearms)
- environmental factors (outdoors, hot and cold environments, wet conditions, darkness)
- shift work or overtime arrangements.

2.3 Controlling the risks

The methods for controlling risk are to rank them from the highest level of protection and reliability to the lowest. This ranking is known as the *hierarchy of risk control*. You must always aim to eliminate a hazard, which is the most effective control. If this is not reasonably practicable, you should minimise the risk by working through the other alternatives in the hierarchy.

The hierarchy of control	Examples
Eliminate the hazard	Eliminate the need to transport cash. Provide automated systems for the loading of heavy cargo to eliminate hazardous manual tasks. Eliminate the risk of trips and falls by repairing any broken or damaged pavement in pickup areas.
Substitute with something safer	Replace manual lifting and loading of heavy cargo with load shifting equipment such as hand or motorised trolleys.
Isolate the hazard from people	Use security screens and barricades to isolate cash handling activities from public areas.
Use engineering controls	Install effective lighting around entrances and exits to avoid concealment. Use of armoured vehicles. Use security features such as CCTV and alarms.
Use administrative controls	Vary routes and delivery times so that movements cannot be predicted.
Use personal protective equipment	Personal body armour Non-slip footwear

Administrative control measures and PPE do not control the hazard at the source. They rely on human behaviour and supervision and used on their own tend to be the least effective control measures to minimise risks.

A sample form for documenting the risk management process is provided at [Appendix A](#).

2.4 Maintaining and reviewing risk control measures

R. 37: Control measures must be maintained so that they continue to protect workers and other people from the hazards associated with plant. The control measures must be:

- fit for purpose

- suitable for the nature and duration of the work
- installed, set up and used correctly.

R. 38: A person conducting a business or undertaking must review and as necessary revise control measures:

- when the control measure is not effective in controlling the risk
- before a change at the workplace that is likely to give rise to a new or different health and safety risk that the control measure may not effectively control
- if a new hazard or risk is identified
- if the results of consultation indicate that a review is necessary
- if a health and safety representative requests a review.

The control measures that are implemented must be reviewed and, if necessary, revised to make sure they work as planned and that no new hazards have been introduced by the control measures. Controls can be checked by using the same methods as in the initial hazard identification.

You should consult your workers and their health and safety representatives and consider the following questions:

- Are the control measures working effectively in both their design and operation?
- Have the control measures introduced new problems?
- How effective is the risk management process? Are all specific hazards being identified?
- Has instruction and training provided to workers been successful?
- Are the frequency and severity of health and safety incidents reducing over time?
- If new legislation or new information becomes available, does it indicate that current controls may no longer be the most effective?

Control measures should be reviewed after the occurrence of a robbery or attempted robbery.

If problems are found, go back through the risk management steps, review your information and make further decisions about risk control.

3. CONTROL MEASURES FOR CASH-IN-TRANSIT

The following chapter provides information on specific risk control measures that should be considered to eliminate or minimise risks to workers carrying out cash-in-transit activities.

Control measures to eliminate or minimise the risks of armed robbery include:

- developing safe work procedures
- allocating appropriate resources
- selecting appropriate vehicles
- imposing cash limits
- providing effective communication
- providing information, training and supervision
- PPE

In addition to this, the *Code of Practice: Managing the Work Environment and Facilities* provides practical guidance on how to provide and maintain a physical work environment that is without risks to health and safety, including information on providing safe entry and exit, welfare facilities, lighting, ventilation and on workplaces that are mobile, temporary and remote.

3.1 Developing safe work procedures

Cash-in-transit operators should develop safe work procedures in consultation with all those involved in cash-in-transit activities. These procedures should be based on the risk management process that has been undertaken.

Safe work procedures may include:

- clearly defined and communicated roles of each duty holder performing the cash-in-transit work activity for example driver, escort guard or cash carrier
- pre-departure checklists
- regular testing of safety equipment such as communication devices and duress alarms
- regular inspections and scheduled maintenance of the vehicles, PPE and other safety equipment
- procedures for maintaining confidentiality such as the description of the work site by security code
- varying cash-in-transit routes, delivery and pick-up times where possible
- communicating with the base, including provision of daily welfare checks
- procedures for work site servicing such as arrival at the work site and departure procedures which be supplemented by the risk assessments
- procedures to defer pick-up or delivery and arrangements for back-up assistance in circumstances where suspicious behaviour or other potential hazards have been identified
- procedures for vehicle collision and/or vehicle equipment breakdown
- processes to monitor adherence to agreed cash limit policy
- hold-up and post hold-up procedures
- processes to address fatigue and stress
- a hazard and incident reporting process.

Contracting arrangements

If an operator engages another business to carry out cash-in-transit work, the operator must ensure that the contracted business is carrying out the work safely. The operator and contractor should agree on the safe work procedures, including arrangements for managing health and safety incidents. The operator should monitor the contractors' activities regularly.

3.2 Allocating appropriate resources

Operators should assess resources including the level of staffing to determine the minimum levels for safely carrying out particular cash-in-transit activities. Once identified the staffing levels should be maintained throughout the cash-in-transit activity.

Selecting appropriate vehicles

Operators should ensure that:

- vehicles are selected in accordance with the nature of the activity and any risk assessment
- the vehicle conforms to the Design Rules for motor vehicles
- vehicles are mechanically sound and serviced and maintained regularly by a competent person (that is, a person who has acquired through training, qualifications or experience the combination of knowledge and skills to carry out the task)
- vehicles are provided with heating and/or air-conditioning systems
- vehicles used for overt activities carry the operator's signage and the workers wear uniforms and carry firearms.

'Soft skin' vehicles (non-armoured vehicles) used for covert activities are unmarked and workers carrying out the covert activity are not in uniform noting that they may or may not carry firearms, depending on the risk assessment. Soft skin vehicles should include the following safety features:

- drop safe, secure container to carry the cash or valuables
- back to base radio with override button for use in an emergency situation
- alternative communication method effective in radio reception 'black spots'
- hands-free mobile telephone if the driver is required to make phone calls
- duress alarm with back to base alert
- remotely activated central locking
- engine immobiliser designed to prevent unauthorised ignition of the vehicles
- GPS or other vehicle tracking systems to locate the vehicle in the event of a duress alarm.

Armoured vehicles used for cash-in-transit activities should be manned by uniformed personnel, be purpose built for the transportation of cash and other valuables and contain the following features:

- ballistic rated protection from armed attack
- back to base radio with override button for use in an emergency
- alternative communication method effective in radio reception 'black spots'
- hands-free mobile telephone if the driver is required to make phone calls
- duress alarm with back to base alert
- remotely activated central locking or alternative method of preventing unauthorised entry into the vehicle
- GPS or other vehicle tracking systems.

Providing effective communication systems

R. 48: A person conducting a business or undertaking must manage risks to the health and safety of a worker associated with remote or isolated work. In minimising these risks, a person conducting a

business or undertaking must provide a system of work that includes effective communication with the worker.

Where a cash-in-transit worker is isolated from the assistance of other persons because of the work site location or the nature of the cash-in-transit work, an effective communication system must be provided. This can include back-to-base communication equipment, personal duress alarms and arrangements for emergency communication.

Assistance may include rescue, medical assistance and the attendance of emergency service workers.

Communication 'black spots' identified in the risk management process should be controlled with the appropriate equipment and procedures.

3.3 Imposing cash limits

Cash limits for each cash-in-transit activity should be determined in accordance with a risk assessment, industry operational needs and insurance provider requirements.

3.4 Designers of workplaces

When conducting approval and planning processes, local councils should consider the risks and hazards experienced by operators of armoured and non-armoured vehicles when performing cash-in-transit work, for example whether appropriate parking spaces are available in close proximity to sites being serviced by operators.

When designing or modifying buildings, architects and designers should take into account the need to minimise the risk of robbery and should collaborate with cash-in-transit operators if possible.

Eliminating or minimising the risk of armed robbery may be achieved by:

- designing the workplace to provide secure areas for pick-up and delivery of cash, including positioning ATMs in low risk areas
- designing safe access and egress
- installing appropriate duress alarm devices in or near cash collection and delivery points and ATM work sites
- strong exterior and interior non-glare lighting is used in and around the workplace
- entrances to foyers, lobbies and car parks are easily observed by pedestrians and motorists.

3.5 Client responsibilities to control the risk of armed robbery

Eliminating or minimising the risk of armed robbery may be achieved by:

- identifying the most secure routes to and from the premises and ATM work sites, in consultation with the operator
- identifying safe and secure vehicle parking and pedestrian access
- considering the installation or position of other security features, for example closed circuit television (CCTV), security personnel, and alarms
- ensuring that there is adequate lighting near ATMs and throughout access/exit routes
- disclosing any prior attempted robbery, actual robbery or other incidents to the operator, as well as any other risk factors related to the pick-up and delivery of cash
- providing information, instruction and training to workers in relation to the risk of robbery, including emergency procedures.

A client site hazard identification checklist that may assist in identifying hazards is provided at Appendix B.

3.6 Information, Training, Instruction and Supervision

S.19 The WHS Act requires a person conducting a business or undertaking to provide relevant information, instruction, training and supervision necessary to protect all persons from risks to their health and safety arising from work carried out.

R.39 The WHS Regulations require that a person conducting a business or undertaking must ensure that information, training and instruction provided to a worker is suitable and adequate having regard to:

- the nature of the work carried out by the worker
- the nature of the risks associated with the work at the time of the information, training and instruction
- the control measures implemented.

The training provided must be readily understandable by any person to whom it is provided.

Provision of information to workers

The information provided to workers undertaking cash-in-transit activities should include:

- results of any safety or security risk assessment
- information on safe work procedures
- manufacturer's instructions on the safe use of plant and equipment.

Qualifications

All workers carrying out cash-in-transit activities must hold appropriate qualifications in accordance with relevant private security and firearms legislation. Work activities should be limited by the level of the qualification and should comply with all other licensing and regulatory requirements.

Training and Supervision

Workers undertaking cash-in-transit work should only be engaged for duties consistent with their qualifications and training and their performance should be continually monitored to ensure that they carry out their duties in a lawful and appropriate manner.

A person who is gaining experience to provide cash-in-transit services (covert or overt) should be under the direct supervision of a person with appropriate skills and experience for either a minimum of three months or until such time as the new worker demonstrates appropriate skills and experience to perform the service safely.

Who should receive training?

Training at the workplace should be provided to:

- workers engaged by a cash-in-transit business or undertaking, who participate in activities which have the potential to expose them to risk of injury or work-related illness
- managers and supervisors of workers carrying out cash-in-transit activities considered at risk of injury or work-related illness from robbery and/or who have responsibility for implementing safe work procedures
- staff responsible for purchasing plant, PPE and for designing, scheduling and organising work activities
- safety and security risk assessors.

The content and methods of presenting training material should be tailored to meet the specific needs of each group. Training should be provided by a competent person.

Training topics

Training programs should include:

- the work health and safety duties of everyone involved in cash-in-transit activities
- the nature and extent of hazards identified in relation to the work performed
- how to respond during a robbery or violent incident
- hazard and incident reporting systems which include the arrangements for reporting defects in plant or equipment used for cash-in-transit work; any other hazards which may present a risk to health and safety (for example hazardous manual tasks); hold-ups, attempted robbery, vehicle collision or other type of incident
- safe work procedures and other control measures adopted to minimise the risk or effects of robbery, other incidents, injury or illness. This includes instruction on:
 - departure, arrival and on-site procedures
 - staffing levels
 - communication systems (including a secondary system)
 - cash limits
 - the use and operation of vehicles and their safety features
 - plant and associated equipment
 - when and how to use PPE including the selection, fitting, proper care and maintenance of PPE
 - correct use of firearms
 - confidentiality
 - how to access health and safety information
 - procedures to be adopted in the event of a hold-up or other emergency, vehicle collision or breakdown and/or other type of incident
 - the effects of robbery on affected workers and/or others undertaking cash-in-transit activities.

3.7 Personal Protective Equipment

R.44: If personal protective equipment (PPE) is to be used at the workplace, the person conducting the business or undertaking must ensure that the equipment is:

- selected to minimise risk to health and safety
- suitable for the nature of the work and any hazard associated with the work
- a suitable size and fit and reasonably comfortable for the person wearing it
- maintained, repaired or replaced so it continues to minimise the risk
- used or worn by the worker, so far as is reasonably practicable.

R 46: A worker must, so far as reasonably able, wear the PPE in accordance with any information, training or reasonable instruction and must not intentionally misuse or damage the equipment.

Equipment supplied to workers conducting cash-in-transit activities may include:

- firearms in a holster compliant with the relevant Firearms Act or equivalent, that includes a locking strap in the case of overt activities, or as required in the case of a covert activity
- back-to-base communication equipment
- personal duress alarms
- non-slip footwear
- personal body armour.

Cash-in-transit activities may require the use of PPE and other equipment in a work environment that is confined or where there are extremes of heat or cold. The effect of PPE in these situations should be considered.

3.8 Emergency plans and first aid arrangements

R.43 A person conducting a business or undertaking must ensure that an emergency plan that provides for emergency procedures and information, training and instruction for workers in relation to implementing the emergency procedures, is prepared and maintained for the workplace.

Emergency plans for cash-in-transit activities must provide procedures on how to respond effectively in an emergency, such as an armed robbery.

Cash-in-transit operators should consult with their clients on the client's emergency plans to ensure both parties know how to respond in an emergency that may occur at the client's workplace. The emergency plan should include procedures on how to evacuate people from the workplace in a controlled manner. Contact numbers for emergency services should be prominently displayed.

Further guidance on emergency plans is available in the *Code of Practice: Managing the Work Environment and Facilities*.

R.42: The WHS Regulations place specific obligations on a person conducting a business or undertaking in relation to first aid, including requirements to:

- provide first aid equipment and ensure each worker at the workplace has access to the equipment
- ensure access to facilities for the administration of first aid, and
- ensure that an adequate number of workers are trained to administer first aid at the workplace or that workers have access to an adequate number of other people who have been trained to administer first aid.

First aid kits must be accessible at the workplace and kept in vehicles or in otherwise agreed locations.

Further guidance on providing first aid and the contents of first aid kits is available in the *Code of Practice: First Aid in the Workplace*.

3.9 Hazardous manual tasks

R.60: A person conducting a business or undertaking must manage risks to health and safety relating to a musculoskeletal disorder associated with a hazardous manual task.

A hazardous manual task means a task that requires a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any person, animal or thing that involves one or more of the following:

- repetitive or sustained force
- high or sudden force
- repetitive movement
- sustained or awkward posture
- exposure to vibration.

Cash-in-transit activities often require handling of cargo. Hazardous manual tasks that are undertaken as part of these activities should be evaluated during the risk management process. Examples of control measures include:

- changing the layout of the workplace to minimise the distance over which cargo is carried
- limiting the size and weight of bags and packages to allow for easier handling
- providing mechanical aids such as trolleys

The *Code of Practice: Hazardous Manual Tasks* explains how to identify hazardous manual tasks, assess the risks of musculoskeletal disorders and eliminate or minimise those risks.

DRAFT

4. INCIDENTS

4.1 Incident reporting

S.38: A person who conducts a business or undertaking must ensure that the regulator is notified immediately after becoming aware that a notifiable incident arising out of the conduct of the business or undertaking has occurred. The notification must be in writing or by telephone. A record of each notifiable incident must be kept for at least 5 years.

A **notifiable incident** is the death of a person; or a serious injury or illness of a person; or a dangerous incident, as prescribed under the WHS Act.

4.2 Serious incident procedures

The personal safety of workers and others involved in, or witnessing, a robbery is the highest priority.

As part of managing the risks of cash-in-transit activities operators and clients should have written procedures for maintaining personal and public safety during an incident and have provided training on those procedures. This means that in the event of a hold-up first aid may be administered, traumatised persons may be treated quickly and appropriately, and the relevant authorities can be contacted.

If a robbery occurs it is important that everyone remains calm and that no action is taken that may jeopardise personal or public safety.

Workers must be trained in how to respond during a robbery or violent incident as part of the organisation's emergency procedures.

4.3 Immediate action after the incident

As soon as it is safe to do so, the Police and, if necessary, ambulance services should be called. The details that are given to the Police during the call should include the exact location of the robbery, the direction in which the robber(s) was travelling, a description of the robber(s), and the name of the person who made the call.

Injured and/or traumatised workers should be given first aid.

As soon as possible after calling the Police, any persons involved in the incident should write down a description of the robber(s), weapons used, and the means of escape. An incomplete but accurate description is of far greater use to the police than an allegedly complete description which is based on conjecture and guesswork.

Evidence should be left undisturbed and access to the area where the crime occurred limited in case evidence such as fingerprints may be obtained.

Any witnesses should wait until the Police arrive so they may give a description of the robber(s). If they are unable to remain at the scene, ask for their names, phone numbers and addresses.

Details of a robbery should not be discussed with witnesses or fellow workers until discussions have been held with the Police. This is because different witnesses may remember different things and talking about it immediately afterwards may confuse the facts.

If necessary, a person holding a firearm licence should secure the firearm of an injured or fatally injured guard.

4.4 Follow-up action

After an incident, workers should be allowed to contact their families to advise them of the situation. You should also inform all workers about what has occurred and update them as necessary.

If a worker is unable to contact their family due to an injury, then a manager/supervisor should contact the worker's family. Workers should be offered counselling after a violent incident has occurred.

If any worker takes time off in the days following the hold-up, the manager should make contact to ensure that the workers are receiving appropriate medical/psychological help. If the workers need information or assistance with making a workers' compensation claim; they should also be advised that the workers compensation insurer may be contacting them.

Workers should be encouraged to resume normal duties as soon as possible once medical clearance to do so is provided. You should also seek professional guidance on rehabilitation options. A worker in consultation with a doctor, psychiatrist or psychologist will make a decision about returning to work.

Managers, supervisors and colleagues should be aware of the complexity of reactions to armed hold-up as the short and long-term psychological effects of being confronted with violence may be severe and in many cases debilitating.

Appendix A: SAMPLE FORM FOR THE RISK MANAGEMENT PROCESS

Customer Name		Branch of Business	
Date of Assessment		Assessor's Name	
Client Code		Servicing Branch/es	
Customer Address		Post Code	
Name of Contact		Telephone	T
Days of Service		Fax No	F
	M <input type="checkbox"/> T <input type="checkbox"/> W <input type="checkbox"/> Th <input type="checkbox"/> F <input type="checkbox"/> S <input type="checkbox"/> Su <input type="checkbox"/>		
When Required	Maximum Daily Value	\$ Collection:	\$ Delivery
Service Provided	Armoured	Non-Armoured	ATM
			Time
<input type="checkbox"/> 2 Key Safe <input type="checkbox"/> Cash Collection <input type="checkbox"/> Bulk Deliver <input type="checkbox"/> Payroll <input type="checkbox"/> Other	<input type="checkbox"/> Banking Service <input type="checkbox"/> Re-Carry <input type="checkbox"/> Receipt for Cash <input type="checkbox"/> Cheque for Cash <input type="checkbox"/> Armoured Service	<input type="checkbox"/> Banking Service <input type="checkbox"/> Re-Carry <input type="checkbox"/> Receipt for Cash <input type="checkbox"/> Cheque for Cash	<input type="checkbox"/> Replenishment <input type="checkbox"/> Break Down Service Travel Time <input type="text"/> Survey Time <input type="text"/> Admin Time <input type="text"/> Km Travel <input type="text"/>
Special Client Instructions:			

Recommended Parking (see work site map)

All operators should vary parking within designated guidelines

<input type="checkbox"/> On Site	<input type="checkbox"/> Parking Meter	<input type="checkbox"/> Loading Zone	<input type="checkbox"/> Street
<input type="checkbox"/> Off Street	<input type="checkbox"/> Parking Station	<input type="checkbox"/> Loading Dock	<input type="checkbox"/> Designated (as per map)

Notes:

Street Directory		MAP REFERENCE	
MAP NUMBER			

SPECIAL SECURITY INSTRUCTIONS

PAVEMENT HAZARDS (as per map)

<input type="checkbox"/> Offender Concealment	<input type="checkbox"/> Public Access	<input type="checkbox"/> Obstacles	<input type="checkbox"/> Access to Client Premises
<input type="checkbox"/> Lighting	<input type="checkbox"/> Approach Route	<input type="checkbox"/> Car Parks	<input type="checkbox"/> Poorly Visible Route

Comments:

CLIENT WORK SITE (Internal) HAZARDS

<input type="checkbox"/> Access	<input type="checkbox"/> Obstacle	<input type="checkbox"/> Areas of concealment	<input type="checkbox"/> Public Access
<input type="checkbox"/> Fire Doors	<input type="checkbox"/> Stairwells	<input type="checkbox"/> Doorways	<input type="checkbox"/> Passageways
<input type="checkbox"/> Lifts	<input type="checkbox"/> Escalators		

Comments:

CLIENT WORK SITE SECURITY FEATURES

- | | | | |
|---|--|---|---|
| <input type="checkbox"/> Cash Office | <input type="checkbox"/> Hold-up Alarm | <input type="checkbox"/> On Site Security | <input type="checkbox"/> On Site Security Armed |
| <input type="checkbox"/> Access Control | <input type="checkbox"/> CCTV Coverage | <input type="checkbox"/> Other | |

Comments:

COMMUNICATIONS	INITIAL WORK SITE	RE-CARRY WORK SITE
Vehicle to control	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Satisfactory
	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)
Portable to Vehicle	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Satisfactory
	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)
Mobile Phone	<input type="checkbox"/> Satisfactory	<input type="checkbox"/> Satisfactory
	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)	<input type="checkbox"/> Unsatisfactory – Counter measure (See Comments)
TRANSPAC Mobile Data	<input type="checkbox"/> Not Applicable	
Security Consultant:		

WORK SITE MAP / PHOTOGRAPH

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CLIENT WORK SITE WHS HAZARD IDENTIFICATION AND RISK ASSESSMENT

Client Name and Address		
Assessed by		Date
Signatures	1.	2.

To be completed by Security or Safety Officer for all new client work sites for the delivery, collection and processing of cash and valuables.

Identify hazard, assess risk level (High, Med and Low), detail risks and suggest controls.

POTENTIAL HAZARD	PRELIMINARY RISK ASSESSMENT				RISKS IDENTIFIED
	(Tick one box in each row)				
EXTERNAL	HIGH	MED	LOW	N/A	
1. Client entrance identification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Vehicle park position	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Vehicle to entrance walking route	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Environmental (e.g. lighting, extreme temperatures)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Hazardous manual tasks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Entrance access	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Other external hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
INTERNAL					

8. Route to service point	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Emergency exits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Service point hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Hazardous manual tasks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. Other internal hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RISK CONTROL ACTION PLAN

Enter controls for the risks identified into the appropriate section of the Risk Control Action Plan, for example altering a door lock or using a trolley is an engineering control, fencing off access to a piece of plant is an isolation control; changing a security procedure or implementing correct handling for hazardous manual tasks is an administrative control.

RISK CONTROL ACTION PLAN

TYPE OF RISK CONTROL	RISK CONTROLS	TIMEFRAME	DATE DONE	SIGN OFF
Elimination and substitution				
Isolation				
Engineering solutions				
Administration and training				
Personal Protective Equipment				
Manager Name			Date	
HSR Name			Date	

Appendix B - CLIENT WORK SITE HAZARD IDENTIFICATION CHECKLIST

HAZARD TOPIC	HAZARDS TO CONSIDER
1. Client entrance identification	<ul style="list-style-type: none"> • Clear identification of correct client and correct entrance doorway.
2. Vehicle park position	<ul style="list-style-type: none"> • Road works • Surrounding traffic • Lighting • Space to exit/enter vehicle • Proximity of facilities for offender concealment
3. Route to service point	<ul style="list-style-type: none"> • Excessive distance • Obstacles for example path surface, road works, barriers, people • High people density, potential for disguised offenders • Surrounding traffic • Lighting • Proximity of facilities for offender concealment • Workmen – potential disguised offenders
4. Service point hazards	<ul style="list-style-type: none"> • Open to public • Lighting • Communication • Entry delay, locks, keys, codes ID, passes • Offender concealment inside
5. Environment	<ul style="list-style-type: none"> • Noise • Ventilation, fumes • Thermal Comfort/Temperature – high, low • Remote and Isolated Work • Glaring sun
6. Hazardous manual tasks	<ul style="list-style-type: none"> • Weight of consignment • Awkward shape of consignment • High number of containers • Provision for trolley if required
7. Entrance access	<ul style="list-style-type: none"> • Stairs – slippery, steep, uneven, too many • Rails – missing, damaged • Excessive entry delay, locks, keys, codes ID, passes • Emergency exits clearly marked and accessible • Offender concealment • Firearms allowed