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MANAGING CASH-IN-TRANSIT SECURITY RISKS

Code of Practice

MAY 2013



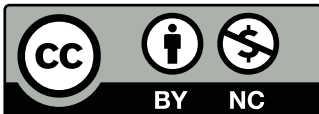
safe work australia



Safe Work Australia is an Australian Government statutory agency established in 2009. Safe Work Australia consists of representatives of the Commonwealth, state and territory governments, the Australian Council of Trade Unions, the Australian Chamber of Commerce and Industry and the Australian Industry Group.

Safe Work Australia works with the Commonwealth, state and territory governments to improve work health and safety and workers' compensation arrangements. Safe Work Australia is a national policy body, not a regulator of work health and safety. The Commonwealth, states and territories have responsibility for regulating and enforcing work health and safety laws in their jurisdiction.

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FOREWORD

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

An approved code of practice is a practical guide to achieving the standards of health, safety and welfare required under the WHS Act and the 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 the code 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 of practice.

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.

SCOPE AND APPLICATION

This Code provides practical guidance for persons conducting a business or undertaking on how to manage risks from transporting cash, including managing the risk of robbery and armed hold-ups.

The Code is for use by the companies, businesses, people and workers in the cash-in-transit industry. This is usually in armoured or non-armoured vehicle operations. It also applies to people who use a security provider to transport cash.

This Code is not intended to apply where a worker transports or handles cash, which is sometimes known as transporting cash 'in-house', for example a hotel worker who takes cash from the hotel to a bank or bank staff moving cash internally within the bank premises.

This Code does not provide information about how other legislation related to cash-in-transit activities, for example legislation for firearms, security, public health and road transport applies.

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 a legal requirement exists and must be complied with.

1. INTRODUCTION

1.1 What is cash-in-transit?

Cash-in-transit activities involve workers transporting or moving cash in vehicles or by foot. Cash includes money, coins, jewels, bullion, securities and other financial instruments. Examples of some cash-in-transit activities are:

- safeguarding cash during transport, and
- servicing and maintaining automatic teller machines (ATMs), automatic ticket machines or similar technology where cash is exposed to the public.

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 to ensure, so far as is reasonably practicable, workers and other people are not exposed to health and safety risks arising from the business or undertaking.

This duty requires the person to manage risks by eliminating health and safety risks so far as is reasonably practicable, and if it is not reasonably practicable to eliminate the risks, by minimising those risks so far as is reasonably practicable. It also includes providing and maintaining a work environment that is without risks to health and safety. These duties are owed by:

- businesses or undertakings that carry out cash-in-transit activities e.g. security providers
- businesses or undertakings using security providers e.g. financial institutions and other clients
- businesses or undertakings with management or control of a workplace e.g. shopping centre managers, and
- businesses or undertakings that design structures e.g. architects, designers and local councils approving the design.

A client, like 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 is collected from or delivered to their premises. A security provider has a duty to ensure their workers—including contractors they engage—can carry out the work safely. A manager of premises has a duty to ensure a safe site.

The WHS Regulations include more specific requirements for businesses and undertakings to manage risks relevant to cash-in-transit activities, like 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, the plant or structure they design, manufacture, import or supply is without risks to health and safety. Designers of buildings and designers of plant, for example, armoured vehicles and ATMs, have an important role in eliminating or minimising the risk of armed robbery and should consult with cash-in-transit security providers and clients to meet their duty. For example, an armoured vehicle should be designed to transport cash and resist armed attack.

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

Workers have a duty to take reasonable care for their own health and safety and to not adversely affect other people's health and safety. Workers must co-operate with reasonable policies or procedures relating to health and safety at the workplace and comply, so far as they are reasonably able, with reasonable instructions. If personal protective equipment (PPE) is provided by the business or undertaking, the worker must so far as they are reasonably able, use or wear it in accordance with the information, instruction and training provided.

Other persons at the workplace, like visitors, must take reasonable care for their own health and safety and must take reasonable care not to adversely affect other people's health and safety. They must comply, so far as they are reasonably able, with reasonable instructions 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 risks associated with cash-in-transit activities?

Section 19(1)(2) and (3)(c)

A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of:

- workers engaged, or caused to be engaged by the person, and
- workers whose activities in carrying out work are influenced or directed by the person

while the workers are at work in the business or undertaking.

A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking and provide safe systems of work.

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

- identifying hazards — find out what could cause harm
- assessing risks if necessary — understand the nature of the harm that could be caused by the hazard, how serious the harm could be and the likelihood of it happening
- controlling risks — implement the most effective control measures that are reasonably practicable in the circumstances, and
- reviewing control measures to ensure they are working as planned.

Guidance on the risk management process is in the Code of Practice: *How to manage work health and safety risks*.

CONSULTING YOUR WORKERS

Section 47(1)

The person conducting a business or undertaking must, so far as is reasonably practicable, consult with workers who carry out work for the business or undertaking who are, or are likely to be, directly affected by a matter relating to work health or safety.

Section 48(2)

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.

You should encourage your workers to report hazards and health and safety problems immediately so the risks can be managed before an incident occurs.

CONSULTING, CO-OPERATING AND CO-ORDINATING ACTIVITIES WITH OTHER DUTY HOLDERS

Section 46

If more than one person has a duty in relation to the same matter under this Act, each person with the duty must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter.

Cash-in-transit activities will usually involve more than one person conducting a business or undertaking who 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 about the hazards and risks and work together in a co-operative and co-ordinated way to eliminate or minimise the risks so far as is reasonably practicable. 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 pick-up location points. They decide on what each will do to control the risks and discuss the emergency plans 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. ABC Security and the contractor agree on arrangements for training that workers transporting cash may need, as well as supervision and monitoring to ensure safe work procedures are being followed.

The business of transporting cash creates 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.

However, risk assessments of cash-in-transit activities, work procedures and other documents containing information about a security provider's procedures, processes and protocols could be used by third parties to compromise the security and safety of cash-in-transit activities. When working together and sharing information, duty holders should ensure such information is kept secure and confidential to minimise the risks to workers and other people, including considering what information is necessary to share, how records should be kept and who needs access to them.

Further guidance on consultation requirements is in the Code of Practice: *Work health and safety consultation, co-operation and co-ordination*.

2. THE RISK MANAGEMENT PROCESS

2.1 Identifying the hazards

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

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

- inspecting client work sites
- inspecting vehicles and equipment
- observing systems of work and work practices
- analysing the routes for cash-in-transit transfers
- talking to workers about problems they have noticed
- reviewing incident, injury and dangerous incident reports e.g. a report on a hold-up, and
- determining the levels of training, experience and competence for the tasks.

HAZARDS ASSOCIATED WITH CASH-IN-TRANSIT ACTIVITIES	HAZARDS MAY ARISE FROM...
■ robberies and armed hold-ups	■ work practices and systems of work
■ hostage situations	■ working alone and working hours
■ worker fatigue and stress	■ access to unprotected information about work procedures and practices
■ manual tasks	■ transport like driving, escort, pick-up and deliveries
■ exposure to temperature variations	■ security, parking, facilities and lighting at client work sites
■ traffic hazards	■ traffic and pedestrians at the site
■ slips, trips and falls	■ entries and exits to a work site
■ use of firearms	

A client site hazard identification checklist to assist in identifying hazards is in Appendix A.

2.2 Assessing the risks

Managing security risks requires assessing all foreseeable risks from carrying out cash-in-transit activities. Security risks can be created by not addressing other health and safety hazards, for example slips, trips or falls can make a security worker vulnerable to an opportunistic robber.

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 determine:

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

Many hazards and their associated risks are well known and have well established and accepted control measures. In these situations the second step to formally assess the risk is unnecessary. If, after identifying a hazard, you already know the risk and how to control it effectively, you may simply implement the controls.

Risk assessments of cash-in-transit activities should be conducted by a competent person, for example a person who holds qualifications in Security Risk Management and relevant experience in the cash-in-transit industry.

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

- whether the activity is overt e.g. not attempting to hide the transport by using a marked armoured vehicle and uniformed workers
- whether the activity is covert e.g. attempting to hide the transport by using an unmarked vehicle and non-uniformed 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 carried out e.g. patrol
- how many people are exposed e.g. crew levels and public activity
- adequacy of communication systems e.g. back to base radio or equivalent technology, mobile phones
- the suitability and condition of the vehicles
- the suitability of equipment for the activity e.g. PPE and firearms
- environmental factors like outdoors, hot and cold environments, wet conditions and darkness, and
- working hours.

2.3 Controlling the risks

Some control measures are more effective than others. Control measures can be ranked from the highest level of protection and reliability to the lowest. This ranking is known as the *hierarchy of control*.

ELIMINATING THE RISK

This means removing the hazard or hazardous work practice from the workplace, for example eliminate the need to transport cash by receiving large payments online or by card. This is the most effective control measure and must always be considered before anything else.

If eliminating the risk is not reasonably practicable, you must consider using substitution, isolation or engineering controls, or a combination of these control measures, to minimise the risk.

MINIMISING THE RISK

Substitution

Minimise the risk by substituting or replacing a hazard or hazardous work practice with a safer one. For example, replace non-armoured cash-in-transit vehicle deliveries with armoured vehicle deliveries, or replace manual lifting and loading of heavy cargo with load shifting equipment like hand or motorised trolleys.

Isolation

Minimise the risk by isolating or separating the hazard or hazardous work practice from people. For example, use secure areas like ATM bunkers or security screens and barricades to isolate cash handling activities from public areas.

Engineering Controls

Engineering controls are physical control measures to minimise risk, for example:

- install effective lighting around entrances and exits to avoid concealment
- use armoured vehicles
- use satellite tracking on vehicles, and
- use security features like closed circuit television and alarms.

If a risk then remains, the duty holder must minimise the remaining risk, so far as is reasonably practicable, by using:

Administrative controls

Administrative controls should only be considered when other higher order control measures are not reasonably practicable, or to increase protection from the hazard. These are work methods or procedures designed to minimise the exposure to a hazard, for example vary routes and delivery times so movements cannot be predicted.

Any remaining risk must be minimised, so far as is reasonably practicable, by providing and ensuring the use of:

Personal protective equipment

PPE is the lowest order control measure in the hierarchy of controls. PPE should only be considered when other higher order control measures are not reasonably practicable or to increase protection from the hazard. Examples of PPE include personal duress alarms and non-slip footwear.

COMBINING CONTROL MEASURES

In most cases a combination of control measures will provide the best solution to minimise the risk to the lowest level reasonably practicable. You should check your chosen control measures do not introduce new hazards.

A sample form for documenting the risk management process is in Appendix B.

2.4 Maintaining and reviewing control measures

The control measures put in place to protect health and safety should be regularly reviewed to make sure they are effective. The nature of cash-in-transit activities means risk control measures may require regular reviewing to deal with changes in work sites and conditions.

For example, control measures should be reviewed:

- after a robbery or attempted robbery
- when an injury or illness occurs because of a hazard the risk assessment addressed, or failed to consider
- before making changes to work procedures
- if new information becomes available to indicate a control measure may no longer be the most effective, and
- when there are changes to who is engaged to carry out work.

Control measures should be reviewed in consultation with workers and their health and safety representatives. Workers are often able to quickly identify and propose solutions to problems when they occur.

Controls should be checked by using the same methods as the initial hazard identification and risk assessment. If a hazard is not eliminated or minimised by the chosen control measures, go back through the risk management steps, review the information and make further decisions about risk control.

3. SPECIFIC CONTROL MEASURES

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

As a person conducting a business or undertaking, security providers should consider control measures like:

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

Besides the business carrying out the cash-in-transit activities, other duty holders have responsibilities to manage security risks, including:

- clients of security providers, and
- managers of premises like shopping centres or councils.

As persons conducting a business or undertaking, these duty holders must ensure, so far as is reasonably practicable, workers are provided with information, training and instruction about the risk of robbery and other risk factors related to cash-in-transit activities, including disclosing previous attempted robberies, actual robberies or other incidents to the security provider.

To eliminate or minimise security risks so far as is reasonably practicable, these duty holders should:

- consult, co-operate and co-ordinate with security providers about vehicle and pedestrian entries to and exits from the premises and ATM
- consider installing or using extra security features e.g. closed circuit television, security personnel, alarms and voice and duress communication
- ensure there is adequate lighting near ATMs and throughout entry and exit routes
- research and consider crime in the area e.g. history, type and likely threats, and
- take into account how long it will take to transport the cash.

The Code of Practice: *Managing the work environment and facilities* also 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 Workplace design

When conducting approval and planning processes, local councils should consider potential hazards to cash-in-transit work, for example whether appropriate parking spaces are available in close proximity to sites being serviced by security providers.

When designing or modifying buildings, architects and designers should minimise security risks and must consult, co-ordinate and co-operate, so far as is reasonably practicable, with cash-in-transit security providers.

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 the workplace to allow other security devices like closed circuit television to be used
- designing entry and exits that are without risks to health and safety
- installing appropriate duress alarm devices in or near cash collection and delivery points and ATM work sites
- using strong exterior and interior non-glare lighting in and around the workplace, and
- ensuring entrances to foyers, lobbies and car parks are easily observed by pedestrians and motorists.

3.2 Allocating appropriate resources

STAFFING LEVELS

Security providers should assess resources including the level of staffing to determine the minimum levels to safely carry out cash-in-transit activities. Once identified, the staffing levels should be maintained throughout the cash-in-transit activity.

SELECTING APPROPRIATE VEHICLES

Security providers should ensure vehicles:

- are appropriate for the activity and based on a risk assessment
- conform to design rules for motor vehicles
- are mechanically sound and are serviced and maintained regularly
- have working heating and air-conditioning systems, and
- include the following safety features:
 - back to base voice communication equipment with override button for use in an emergency
 - an alternative communication method effective in reception 'black spots' e.g. in remote parts of Australia or underground car parks
 - 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 an alternative method of preventing unauthorised entry into the vehicle
 - drop safe, secure container or other method of ensuring cash is secure
 - an engine immobiliser designed to prevent unauthorised ignition
 - engine shutdown from remote monitoring centre or base
 - Global Positioning System or other vehicle tracking systems to locate the vehicle when required.

Armoured vehicles used for overt activities should be identifiable as belonging to the security provider, for example marked with the provider's name and logo. It should be operated by uniformed personnel carrying firearms and purpose built for transporting cash including ballistic-rated protection from armed attack and where appropriate, man-trap entry systems.

This draft Code has been provided to the Select Council on Workplace Relations (Ministerial Council) for agreement. This Code will become a model WHS Code of Practice under the Inter-Governmental Agreement for Regulatory and Operational reform in OHS when it is agreed by the Ministerial Council.

Non-armoured vehicles, or 'soft skin' vehicles, used for covert activities should be unmarked and workers carrying out the covert activity should not be in uniform – noting they may or may not carry firearms depending on a risk assessment.

Regulation 48(1)
and (2)

PROVIDING EFFECTIVE COMMUNICATION SYSTEMS

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 risks to the health and safety of a worker associated with remote or isolated work, a person conducting a business or undertaking must provide a system of work that includes effective communication with the worker.

Before considering implementing communication systems, security providers must consider eliminating or minimising the need for remote or isolated work.

Where a cash-in-transit worker is isolated from the assistance of other people 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 Developing safe work procedures

Cash-in-transit security providers should develop safe work procedures in consultation with all those involved in cash-in-transit activities. These procedures should be based on the outcomes of the risk management process.

Safe work procedures may include:

- each duty holder clearly defining and communicating the roles of each worker involved in the cash-in-transit work activity e.g. driver, escort guard or cash carrier
- pre-departure checklists
- testing safety equipment regularly e.g. communication devices and duress alarms
- inspecting and maintaining vehicles, PPE and other safety equipment regularly
- procedures for maintaining confidentiality e.g. the description of the work site by security code
- conducting cash-in-transit activities outside regular business hours
- varying cash-in-transit routes, delivery and pick-up times
- communicating with the base, including providing daily welfare checks
- developing procedures for work site servicing like arrival and departure procedures
- developing procedures to defer pick-up or delivery and arrangements for back-up help where suspicious behaviour or other potential hazards are identified
- developing procedures for vehicle collision and vehicle equipment breakdown

- developing policies and processes to monitor and reduce the build up of cash
- developing hold-up and post hold-up procedures
- testing emergency procedures
- developing processes to address fatigue and stress, and
- developing a hazard and incident reporting process.

CONTRACTING ARRANGEMENTS

If a security provider engages another business to carry out cash-in-transit work, the security provider should ensure this contracted business—referred to as a contractor—is carrying out the work safely. The security provider and contractor should agree on the safe work procedures including arrangements to manage health and safety incidents. The security provider should disclose prior attempted robbery, actual robbery or other incidents to the contractor, as well as other risk factors related to cash-in-transit activities. The security provider should monitor the contractor’s activities regularly.

3.4 Varying delivery routes and times

Regular route and delivery times increase vulnerability to robbery attempts. Delivery routes and times should be varied as much as possible. Where delivery routes and times are identified as risk factors, risk management strategies should be put in place.

3.5 Reducing cash build-up

Security providers should try to reduce cash build-ups. This may be achieved by putting in place cash limits for each cash-in-transit activity based on a risk assessment and industry operational needs.

3.6 Hazardous manual tasks

Regulation 60(1)

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.

Cash-in-transit activities often involve hazardous manual tasks like lifting cash bags. These manual tasks should be evaluated during the risk management process. Examples of control measures include:

- changing the layout of the workplace to minimise the distance cargo is carried
- limiting the size and weight of bags and packages to allow for easier handling, and
- providing mechanical aids like 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 so far as is reasonably practicable.

3.7 Information, training, instruction and supervision

Section **19(3)(f)**

A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking.

Regulation **39(2) and (3)**

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, and
- the control measures implemented.

The person must ensure, so far as is reasonably practicable, that the information, training and instruction provided under this regulation is provided in a way that is readily understandable by any person to whom it is provided.

PROVIDING INFORMATION TO YOUR WORKERS

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

- results of a risk assessment
- information on safe work procedures, and
- manufacturer's instructions on the safe use of plant and equipment.

QUALIFICATIONS

Security and firearm legislation requires workers carrying out cash-in-transit activities and consultants providing security advice to hold qualifications relevant to their work. Work activities should be limited by the level of the qualification and should comply with licensing and regulatory requirements outside work health and safety.

A person conducting a business or undertaking should ensure the person who completes a risk assessment of cash-in-transit activities:

- is a competent person
- holds qualifications in Security Risk Management e.g. a minimum Certificate 4 Risk Management, and
- has cash-in-transit industry experience.

TRAINING AND SUPERVISION

Workers carrying out cash-in-transit work should only be directed or allowed to perform duties consistent with their qualifications and experience. A person conducting a business or undertaking must, so far as is reasonably practicable, ensure workers are provided training that gives them the skills necessary to carry out their duties safely and competently. Their performance should be monitored to ensure they carry out their duties in this way.

A person who is gaining competency skills to provide cash-in-transit services, either covert or overt, should work in a 'buddy system' under the direct supervision of a person with appropriate qualifications, skills and experience until they demonstrate the appropriate skills to perform the service safely.

Security providers should ensure refresher programs form part of the education and training cycle of their workers, including simulated street operations for vehicle operators.

Who should receive training?

Training at the workplace should be provided to:

- workers carrying out cash-in-transit activities who may be exposed to a risk to their health and safety
- managers and supervisors of workers carrying out cash-in-transit activities who have responsibility for implementing safe work procedures
- staff responsible for buying plant, PPE and for designing, scheduling or organising work activities, and
- 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 person who has the knowledge and skills, developed through appropriate training, qualifications or experience. Security legislation in your jurisdiction may require a person to be licensed to deliver security training.

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 and risks identified in the work carried out
- how to respond during a robbery or violent incident
- situational awareness
- hazard and incident reporting systems, including arrangements for reporting defects in plant used for cash-in-transit work and other hazards that may present a risk to health and safety e.g. hazardous manual tasks, hold-ups, attempted robberies or vehicle collisions, and
- 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
 - using and operating vehicles and their safety features
 - plant and associated equipment
 - when and how to use PPE including selecting, fitting, care and maintenance
 - correct firearms use
 - confidentiality
 - how to access health and safety information
 - procedures for a hold-up or other emergency, vehicle collision, breakdown or other type of incident

- the effects of robbery on affected workers and others carrying out cash-in-transit activities
- planning transit routes and times to minimise predictability
- worker fatigue and stress management.

3.8 Personal protective equipment

Regulation 44(1)(2) and (3)

If personal protective equipment is to be used to minimise a risk to health and safety in relation to work at a workplace in accordance with regulation 36, the person conducting a business or undertaking who directs the carrying out of work must provide the personal protective equipment to workers at the workplace, unless the personal protective equipment has been provided by another person conducting a business or undertaking.

The person conducting the business or undertaking who directs the carrying out of work must ensure the equipment is:

- selected to minimise risk to health and safety
- suitable having regard to the nature of the work and any hazard associated with the work
- a suitable size and fit and reasonably comfortable for the worker who is to use or wear it
- maintained, repaired or replaced so that it continues to minimise risk to the worker who uses it
- clean, hygienic and in good working order, and
- used or worn by the worker, so far as is reasonably practicable.

Regulation 45

The person conducting a business or undertaking who directs the carrying out of work must ensure, so far as is reasonably practicable, that personal protective equipment to be used or worn by any person other than a worker at the workplace is capable of minimising risk to the person's health and safety and the person uses or wears the equipment.

Regulation 46(2)

The worker must, so far as the worker is reasonably able, use or wear the equipment in accordance with any information, training or reasonable instruction given by the person conducting the business or undertaking.

The worker must not intentionally misuse or damage the equipment.

Equipment supplied to workers carrying out 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 voice communication equipment
- personal duress alarms
- non-slip footwear
- personal body armour, where approved by the relevant security authority, and
- reflective vest or stripping.

When carrying out a risk assessment you should consider the suitability of PPE during cash-in-transit activities, including if their use introduces new risks. For example, consider whether personal body armour might affect work carried out in extremes of heat or cold or in smaller spaces where movement is restricted.

3.9 Emergency plans and incident response

Regulation 43(1)

A person conducting a business or undertaking must ensure that an emergency plan is prepared and maintained so it remains effective for the workplace, and provides for the following:

- emergency procedures, including:
 - an effective response to an emergency
 - evacuation procedures
 - notifying emergency service organisations at the earliest opportunity
 - medical treatment and assistance
 - effective communication between the person authorised by the person conducting the business or undertaking to coordinate the emergency response and all persons at the workplace
- testing of the emergency procedures, including the frequency of testing, and
- information, training and instruction to relevant workers in relation to implementing the emergency procedures.

EMERGENCY PLANS

Cash-in-transit security providers, their clients, the managers of clients' premises and other relevant duty holders have obligations to ensure there is adequate and effective emergency planning and access to first aid for people involved in cash-in-transit activities.

Relevant duty holders should consult, co-operate and co-ordinate on emergency plans to ensure people involved in cash-in-transit activities know how to respond in an emergency.

Emergency plans for cash-in-transit activities must provide procedures on how to respond effectively in a range of potential emergencies, for example an armed robbery or vehicle collision. They should also include procedures on how to evacuate people from the workplace in a controlled manner. Contact numbers for emergency services should be displayed in the armoured vehicle and programmed into phones or other communication systems.

Further information is in the *Emergency Plans Fact Sheet*, the Code of Practice: *Managing the work environment and facilities* and the Code of Practice: *First aid in the workplace*.

EFFECTIVE RESPONSE TO AN ARMED ROBBERY

An armed robbery or other violent incident is a particularly dangerous and frightening incident for workers. Part of the emergency plan must include procedures to be implemented when an armed robbery occurs. This should include:

- How to respond when an armed robbery is taking place—it is important persons conducting a business or undertaking and workers do not do anything that may put the health and safety of themselves, workers or other people at the workplace at further risk. Once the risk is over the worker's or another workers' firearm should be secured.
- Training and practice—workers should be trained in this response and practice the response regularly so they can act effectively and safely, including how and when to communicate with the security provider and emergency services.
- Medical assistance and first aid—when to notify emergency services, workers must have access to first aid equipment and an adequate number of workers must be trained to administer first aid.
- Incident reporting—section 48 of the WHS Act requires a person conducting a business or undertaking to report a death, serious injury or illness as soon as they are aware of it to the regulator. A record of the incident notification must be kept for five years.
- Procedures after the incident—including:
 - what workers can expect from contact with police after the incident e.g. reporting what and who they saw
 - not disturbing evidence at the incident site (see section 39 of the WHS Act)
 - contacting victims' families and other workers
 - reviewing risk assessments and control measures
 - providing debriefings to workers
 - providing and encouraging counselling for workers involved and workers affected by the incident, for example colleagues of the victims, and
 - contacting workers who take time off following an incident to check they are receiving appropriate medical and psychological help to minimise, so far as is reasonably practicable, the risk of mental illness.

APPENDIX A - 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 enter/exit vehicle ■ Proximity of facilities for offender concealment
3. Route to service point	<ul style="list-style-type: none"> ■ Predictable route and time ■ Excessive distance ■ Obstacles e.g. path surface, road works, barriers, people ■ High people density, potential for disguised offenders ■ Surrounding traffic ■ Lighting ■ Proximity of facilities for offender concealment
4. Service point	<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
7. Entrance access	<ul style="list-style-type: none"> ■ Stairs - slippery, steep, uneven, numerous ■ Rails - missing, damaged ■ Excessive entry delay - locks, keys, codes ID, passes ■ Emergency exits clearly marked and accessible ■ Offender concealment ■ Firearms allowed

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APPENDIX B - 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		Fax No	
Days of Service	M <input type="checkbox"/> T <input type="checkbox"/> W <input type="checkbox"/> T <input type="checkbox"/> F <input type="checkbox"/> S <input type="checkbox"/> S <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"/> Banking Service	<input type="checkbox"/> Banking Service	<input type="checkbox"/> Replenishment	Travel Time <input type="text"/>
<input type="checkbox"/> Cash Collection	<input type="checkbox"/> Re-Carry	<input type="checkbox"/> Re-Carry	<input type="checkbox"/> Break Down Service	Survey Time <input type="text"/>
<input type="checkbox"/> Bulk Deliver	<input type="checkbox"/> Receipt for Cash	<input type="checkbox"/> Receipt for Cash		Admin Time <input type="text"/>
<input type="checkbox"/> Payroll	<input type="checkbox"/> Cheque for Cash	<input type="checkbox"/> Cheque for Cash		Km Travel <input type="text"/>
<input type="checkbox"/> Other	<input type="checkbox"/> Armoured Service			

Special Client Instructions:

APPENDIX B - SAMPLE FORM FOR THE RISK MANAGEMENT PROCESS

Recommended Parking (see work site map)

All security providers should vary parking within designated guidelines

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

Street Directory	MAP NUMBER
	MAP REFERENCE

SPECIAL SECURITY INSTRUCTIONS

PAVEMENT HAZARDS (as per map)

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

CLIENT WORK SITE (Internal) HAZARDS

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

APPENDIX B - SAMPLE FORM FOR THE RISK MANAGEMENT

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"/> Closed Circuit Television 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	
Comments:		

APPENDIX B - SAMPLE FORM FOR THE RISK MANAGEMENT

WORK SITE MAP / PHOTOGRAPH

CLIENT WORK SITE HAZARD IDENTIFICATION AND RISK ASSESSMENT

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

To be completed by Security or Safety Officer for new client work sites for the delivery, collection and processing of cash. Identify hazard, assess risk level (High, Med and Low), detail risks and suggest controls.

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APPENDIX B - SAMPLE FORM FOR THE RISK MANAGEMENT

POTENTIAL HAZARD	PRELIMINARY RISK ASSESSMENT (Tick one box in each row)				RISKS IDENTIFIED
EXTERNAL TO CLIENT'S PREMISES	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. Transit route and time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Other external hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
INTERNAL TO CLIENT'S PREMISES					
9. Route to service point	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Emergency exits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Service point hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Hazardous manual tasks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Other internal hazards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

APPENDIX B - SAMPLE FORM FOR THE RISK MANAGEMENT

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	
Health and Safety Rep.Name			Date	

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THIS CODE PROVIDES
PRACTICAL GUIDANCE ON
HOW TO MANAGE HEALTH AND
SAFETY RISKS ASSOCIATED
WITH TRANSPORTING CASH.

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