GENERAL GUIDE FOR MANAGING CASH-IN-TRANSIT SECURITY RISKS

This General Guide provides information on how to manage cash-in-transit security risks. It is supported by an Information Sheet for small business.



What is cash-in-transit?

Cash-in-transit activities involve workers transporting or moving cash in vehicles or by foot. This is usually carried out by a security provider. Cash includes money, coins, jewels, bullion, securities and other financial instruments.

Examples of some cash-in-transit activities include:

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



Who should use this Guide?

This General Guide is for companies, businesses, people and workers in the cash-in-transit industry, usually involving armoured or non-armoured vehicle operations. It is also for:

- businesses that use a security provider to transport cash, and
- persons conducting a business or undertaking who manage workplaces like shopping centre managers and other duty holders like architects, designers and local councils that have a role in determining how cash is transported or stored.

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



Handling cash 'in house'

This Guide does not apply to businesses or undertakings that handle or transport cash 'in-house' rather than engaging a security provider for these services. For example:

- retailers, chemists or hotels where a worker or business owner transports cash from the workplace to a bank, or
- bank staff moving cash internally within the bank premises.
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These types of business should read the <u>Guide for handling and transporting cash</u> for information on how to manage cash handling and transportation risks.







Who has duties under the law?

Everyone in the workplace has a work health and safety duty. The main duties are set out in Table 1.

Table 1 Duty holders and their obligations

Who	Duties
Person conducting a business or undertaking	A person conducting a business or undertaking must ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks arising from the business or undertaking.
	For cash-in-transit this includes businesses or undertakings that:
	carry out cash-in-transit activities e.g. security providers
	use security providers e.g. financial institutions and other clients
	 manage or control a workplace e.g. shopping centre managers, and
	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.
Designers, manufacturers, suppliers and importers	Designers, manufacturers, suppliers and importers of plant or structures must ensure, so far as is reasonably practicable, the plant or structure is without risks to health and safety. For example, an armoured vehicle should be designed to transport cash and resist armed attack. Designers of buildings and plant should consult with cash-in-transit security providers and clients to meet their duty to eliminate or minimise the risks from cash-in-transit-activities.
Officers	Officers, such as company directors, have a duty to exercise due diligence to ensure the business or undertaking complies with the Work Health and Safety (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 risks from cash-in-transit activities.
Workers and others	Workers and other people at the workplace must take reasonable care for their own health and safety, co-operate with reasonable policies, procedures and instructions and not adversely affect other people's health and safety.



How can cash-in-transit risks be managed?

Use the following steps to ensure, so far as is reasonably practicable, that workers and other people are not exposed to health and safety risks:





1. Find out what could cause harm. Hazards can arise from:

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

#2 Assess risks



2. Assess the risk. In many cases the risks and related control measures will be well known. In other cases you may need to carry out a risk assessment to identify the likelihood of somebody being harmed by the hazard and how serious the harm could be. A risk assessment can help you determine what action you should take to control the risk and how urgently the action needs to be taken.

For cash-in-transit activities there are serious risks of robberies, armed hold-ups, hostage situations and from using firearms. Think about:

- 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 activity including the rotation of workers carrying out regular activities
- working hours, the time of the work and periods of peak traffic
- the amount of cash in each transfer
- how many people are exposed e.g. crew levels and public activity
- the suitability and condition of vehicles and equipment like personal protective equipment (PPE) including firearms and communication systems like back to base radio, and
- environmental factors like hot and cold environments, wet conditions and darkness.

#3 Control risks



3. Take action to control the risk. The WHS laws require a business or undertaking do all that is reasonably practicable to eliminate or minimise risks.

The ways of controlling risks are ranked from the highest level of protection and reliability to the lowest. This ranking is known as the hierarchy of risk control. You must work through this hierarchy to manage risks.

The first thing to consider is whether hazards can be completely removed from the workplace. For example, eliminate the need to transport cash by receiving large payments online or by card.

If it is not reasonably practicable to completely eliminate the risk then consider one or more of the following options in the order they appear below to minimise risks, so far as is reasonably practicable:

- substitute the hazard for something safer e.g. replace non-armoured cash-in-transit vehicle deliveries with armoured vehicle deliveries
- isolate the hazard from people e.g. use secure areas like ATM bunkers or security screens and barricades to isolate cash handling activities from public areas
- use engineering controls e.g. effective lighting around entrances and exits to avoid concealment, armoured vehicles, satellite tracking on vehicles and security features like closed circuit television and alarms

If after implementing the above control measures a risk still remains, consider the following controls in the order below to minimise the remaining risk, so far as is reasonably practicable:

- use administrative controls e.g. vary routes and delivery times so movements cannot be predicted, or
- use PPE e.g. personal duress alarms and non-slip footwear.

A combination of the controls set out above may be used if a single control is not enough to minimise the risks.

You need to consider all possible control measures and make a decision about which are reasonably practicable for your workplace. Deciding what is reasonably practicable includes the availability and suitability of control measures, with a preference for using substitution, isolation or engineering controls to minimise risks before using administrative controls or PPE. Cost may also be relevant, but you can only consider this after all other factors have been taken into account.

#4 Review control measures



4. Check your control measures regularly to ensure they are working as planned. Control measures need to be regularly reviewed to make sure they remain effective, taking into consideration any changes, the nature and duration of work and that the system is working as planned.



Further information on the risk management process is in the <u>Code of Practice</u>: <u>How to manage work health and safety risks</u>.



A <u>Sample Form</u> for documenting the risk management process is available on the Safe Work Australia website.



Who is involved?

You must consult your workers and their health and safety representatives (if any) when deciding how to manage risks in the workplace.

If there is more than one duty holder involved in the cash-in-transit activity you must consult them to find out who is doing what and work together so risks are eliminated or minimised so far as is reasonably practicable. This may involve discussing previous attempted robberies, actual robberies or other incidents. An example of how this can work is provided below.

A financial institution—the client—located in a shopping centre engages CDE Security to transport cash to and from its premises including the ATMs. CDE Security engages a contractor to transport the cash.

The client, CDE 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.

CDE Security provides all relevant information to the contractor and finds out how the contractor will manage health and safety risks arising from the work. CDE 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.

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 information is kept secure and confidential to minimise the risks to workers and other people. This includes considering what information is necessary to share, how records should be kept and who needs access to them.



Further information on consultation requirements is in the <u>Code of Practice</u>: <u>Work health</u> and safety consultation, co-operation and co-ordination.

SPECIFIC CONTROL MEASURES



Workplace design

When conducting approval and planning processes, duty holders like local councils should consider potential hazards to cash-in-transit work, for example whether 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 could 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 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, particularly near ATMs and throughout entry and exit routes, and
- ensuring entrances to foyers, lobbies and car parks are easily observed by pedestrians and motorists.



The <u>Code of Practice: Managing the work environment and facilities</u> also provides information 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.



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. The staffing levels should be maintained throughout the cash-in-transit activity.



Selecting vehicles

Security providers should ensure vehicles:

- are suitable 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
- where reasonably practicable 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, and
- Global Positioning System or other vehicle tracking system 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. Armoured vehicles should:

- be operated by uniformed personnel carrying firearms
- be purpose built for transporting cash including ballistic-rated protection from armed attack, and
- include a system of secure partitioning that allows the crew to enter and exit the vehicle without exposing the crew and that restricts access to the vehicle's cargo by persons other than the crew.

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.



Communication systems

Before implementing communication systems, security providers must consider eliminating or minimising the need for workers to work alone or in remote locations.

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

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



Safe work procedures

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

Safe work procedures should 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, arrival and departure procedures
- procedures for maintaining confidentiality e.g. 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
- procedures to defer pick-up or delivery and arrangements for back-up help where suspicious behaviour or other potential hazards are identified
- procedures for vehicle collision and vehicle equipment breakdown
- policies and processes to monitor and reduce the build-up of cash
- hold-up and post hold-up procedures
- testing emergency procedures and safety equipment regularly e.g. communication devices and duress alarms
- inspecting and maintaining vehicles, PPE and other safety equipment regularly

- processes to address fatigue and stress, and
- hazard and incident reporting process.



Client work sites

Review the client's work site to identify potential hazards and risks. For example consider:

- whether the route to the site or the timing is predictable
- traffic in the area including road works or obstacles
- the location of parking, client entrances, vehicle entries and exits
- slips, trips or fall hazards which could make a security worker vulnerable to robbery
- lighting at entrance points, service points and where the vehicle will be parked
- areas where offenders could be concealed including inside the service point
- high people density at the site with the potential for disguised offenders
- whether the service point requires keys, codes or ID passes which could cause excessive entry delay, and
- emergency exits that are clearly marked and accessible.



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 and risks related to cash-in-transit activities. The security provider should monitor the contractor's activities regularly.



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.



Reducing cash build-up

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



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.

The person who carries out a risk assessment of cash-in-transit activities should be a competent person who holds qualifications in Security Risk Management—for example a minimum Certificate 4 Risk Management—and has cash-in-transit industry experience.



Hazardous manual tasks

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 <u>Code of Practice: Hazardous manual tasks</u> 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.



Information, training and supervision

Workers should be provided with information on safe work procedures, the results of risk assessments and the safe use of plant including manufacturers' instructions.

Workers must be provided with training that gives them the skills necessary to carry out their duties safely and competently. Workers carrying out cash-in-transit work should only perform duties consistent with their qualifications and experience. Workers should be supervised 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 qualifications, skills and experience until they demonstrate the skills to carry out the work 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 training, qualifications or experience. Security legislation in your jurisdiction may require a person to be licensed to deliver security training.



Training topics

Training topics could 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 e.g. hazardous manual tasks, hold-ups, attempted robberies or vehicle collisions
- safe work procedures and other control measures used to minimise risks including 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 workers and others carrying out cash-in-transit activities
- planning transit routes and times to minimise predictability, and
- worker fatigue and stress management.



Personal protective equipment

If PPE is required, the person conducting a business or undertaking who is directing the work must provide PPE to workers at the workplace. PPE 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 vests 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.



Emergency plans

Duty holders like security providers, their clients and the managers of clients' have obligations to ensure there is effective emergency planning and access to first aid for people involved in cash-in-transit activities. Duty holders should consult, co-operate and co-ordinate to ensure people involved in cash-in-transit activities know how to respond in an emergency.

An emergency plan must be prepared for the workplace, including for workers who may work at multiple workplaces. 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 and provide for the testing of emergency procedures. 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 <u>Emergency plans fact sheet</u>, the <u>Code of Practice</u>: <u>Managing the work environment and facilities</u> and the <u>Code of Practice</u>: <u>First aid in the workplace</u>.



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 for when an armed robbery occurs. This should include:

- How to respond when an armed robbery is taking place—it is important that people do not do anything that may put the health and safety of themselves or other people at the workplace at further risk. Once the risk is over firearms should be secured.
- Training and practise—workers should be trained in this response and practise the response regularly. This should cover how and when workers should communicate with the security provider and emergency services.
- Medical assistance and first aid—workers must have access to first aid equipment and a suitable number of workers must be trained to administer first aid.
- Incident reporting—you must report a death, serious injury or illness as soon as you 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 and other people affected by the incident e.g. colleagues of the victims, and
 - contacting workers who take time off following an incident to check they are receiving medical and psychological help to minimise, so far as is reasonably practicable, the risk of mental illness.