

Australian Capital Territory

## **Occupational Health and Safety – Code of Practice for the Transport and Delivery of Cash 2003**

### **Disallowable Instrument DI2003–260**

made under the

*Occupational Health and Safety Act 1989* – section 87 (1) – Codes of Practice

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Pursuant to section 87 (1) of the *Occupational Health and Safety Act 1989* I approve the Code of Practice for the Transport and Delivery of Cash set out in the attached Schedule.

Katy Gallagher  
Minister for Industrial Relations

Dated this 19th day of August 2003

# SCHEDULE

# Code of Practice for the Transport and Delivery of Cash

August 2003



AUSTRALIAN  
CAPITAL TERRITORY

**CODE OF PRACTICE**

**FOR THE**

**TRANSPORT AND DELIVERY OF**

**CASH**

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# **1 PRELIMINARY**

## **1.1 TITLE**

This is the Code of Practice for the Transport and Delivery of Cash.

## **1.2 PURPOSE**

This Code of Practice provides guidance to prevent injury and illness to persons engaged in cash-in-transit (C-I-T) operations and work. It also provides practical guidance on implementing the requirements of the *Occupational Health and Safety Act 1989* (OHS Act) and associated regulations.

The objectives of this Code of Practice are to:

- promote the health, safety and welfare of people undertaking C-I-T activities;
- provide guidance on the standards of safety for those who undertake C-I-T services;
- ensure that risks to health and safety associated with C-I-T operations are identified, assessed and eliminated or controlled;
- promote consultation and cooperation between the employer, employees, contractors and sub-contractors; and
- protect persons at or near workplaces from risks to health or safety arising out of the activities of employees at work.

## **1.3 APPLICATION, REGULATION AND SCOPE**

The Occupational Health and Safety Commissioner promotes occupational health and safety through education, liaison with community and government bodies as well as the enforcement of the OHS Act and associated regulations.

The Commissioner for the Office for Fair Trading in the ACT regulates the licensing of persons involved in C-I-T activities. This includes receiving applications and registration fees, processing applications, notifying each applicant of the outcome of the application, and deregistering employees in accordance with relevant codes.

This Code of Practice applies to everyone involved in C-I-T operations in the Australian Capital Territory. It is particularly useful to:

- employers;
- persons in control of workplaces;
- self-employed persons; and
- employees.

## **1.4 THE TRANSPORT AND DELIVERY OF CASH**

The transport and delivery of cash, generally known as Cash-In-Transit (C-I-T) operations, is any service whereby a person or persons transports cash on behalf of another person or persons as part of an undertaking by any means and includes:

- an escort service whereby such property is safeguarded in the course of such transportation;
- the provision of management, secretarial or administration as part of such a service; and
- work performed in relation to the servicing or maintenance of ATMs or equivalent technology.

## **1.5 COMMENCEMENT**

This Code of Practice is to commence on 29 August 2003.

## **1.6 AUTHORITY**

This Code of Practice is approved pursuant to section 87 of the OHS Act by the Minister for Industrial Relations on the recommendation of the ACT Occupational Health and Safety Council.

# **2 DUTY OF CARE**

The OHS Act requires that everyone in the workplace be aware of industry-specific risks and take steps to prevent workplace accidents, injuries and illnesses.

## **2.1 EMPLOYERS' DUTY OF CARE**

Employers must take all reasonably practicable steps to provide a safe and healthy work environment for employees and persons at or near the workplace. This includes safe systems of work and providing employees with safe equipment and materials. Employers need to make available to employees the resources to implement and support safe work practices as well as ensure that employees are informed about and are involved in, health and safety issues.

Employers are responsible for the development of a health and safety policy and related documentation and to ensure that these documents are kept up-to-date.

## **2.2 PERSONS IN CONTROL OF WORKPLACES**

Under the OHS Act, persons in control of workplaces must take all reasonably practicable steps to ensure that the workplace, the access to and egress from the workplace as well as plant and/or substance at a workplace, is safe and without risk to health.

When contracting out C-I-T work to sub-contractors, C-I-T operators must ensure that the sub-contractor is carrying out the work in a safe manner and in accordance with this Code of Practice.

## **2.3 SUB-CONTRACTORS' DUTY OF CARE**

The sole sub-contractor should ensure that all reasonably practicable steps are taken to ensure that the health and safety of persons, other than employees, are not adversely affected by the work being undertaken.

Sub-contractors who have engaged people as employees, have the same duty of care as an employer.

## **2.4 EMPLOYEES' DUTY OF CARE**

Employees are required to follow safety procedures and instructions and participate in safety training. They must use the safety equipment provided by their employers and take all reasonably practicable steps to report any action that creates a risk, workplace hazard or occurrence.

Under the OHS Act, employees are required to actively cooperate and participate in the resolution of occupational health and safety issues, not take action that will endanger their or another persons health and safety and not interfere with or remove safety equipment.

# **3 CONSULTATION AT THE WORKPLACE**

The OHS Act requires employers to take all reasonably practicable steps to consult with employees and take into account their views when making decisions that affect their health, safety and welfare, including systems of work. It is the employer's responsibility to consult with the Health and Safety Representative (HSR) as soon as possible on any changes planned for the workplace where those changes may affect the health and safety of any employee.

## **3.1 STAKEHOLDER INVOLVEMENT**

The involvement of employees in the risk management process is an essential step in achieving workplace health and safety. The information in this Code of Practice should be used when consulting with employees (whether directly or through their HSR, as appropriate) about decisions that affect their health, safety and welfare.

Each organisation will have an established method of communication and consultation in the workplace that is appropriate to that organisation. This might involve memos, notice boards, staff meetings, meetings with the Occupational Health and Safety Committee (OHS Committee), where it exists, as well as other methods of communication. Employers should use these opportunities to encourage employees to discuss occupational health and safety issues as well as identify problems and possible solutions.

To achieve good health and safety outcomes, the employer should:

- consult with either the elected/selected HSR, OHS Committee (if any) or involved union(s);



- consult with each involved union in relation to the established Designated Work Groups;
- document issues raised and decisions reached;
- demonstrate commitment;
- encourage employees to talk about health and safety issues; and
- take action to ensure that issues are resolved.

The employer should undertake consultation in the following circumstances:

- when developing measures to:
  - identify systems of work;
  - consider the elimination or control of risks;
  - introduce or alter procedures for monitoring workplace risks;
  - change the facilities in the workplace; and
  - change the process of consultation.
- when changes are proposed to the:
  - work environment;
  - systems or methods of work; and
  - plant or substances used for work.

### **3.2 PROCEDURES FOR RESOLVING HEALTH AND SAFETY MATTERS**

While the emphasis is on consultation and cooperation, problems may still arise when there are disagreements between employers and employees on health and safety issues.

If employers and employees cannot reach an agreement on health and safety issues, then they should utilise the services of their HSR or the OHS Committee (if any). If the consultation process fails to resolve a health and safety issue, the HSR has the power to issue a Provisional Improvement Notice (PIN). Issuing a PIN is a formal process that involves notifying ACT WorkCover. Issuing a PIN should be used as a last resort where other forms of dispute resolution have proven to be ineffective.

If the situation is still unresolved then contact can be made with other agencies and/or organisations that may assist with solving the disagreement. These organisations might include peak bodies, industry associations, OHS professionals or ACT WorkCover.

## 4 MANAGING RISKS

Employers involved in the C-I-T industry should have clear, well-documented policies and procedures for dealing with health and safety issues that set out who is accountable for each element of the work.

The employer should undertake a hazard identification and risk assessment process at the planning stage of any job, in consultation with experienced staff, to determine the risks. Safe systems of work must then be put in place to minimise those risks.

The four simple steps to risk management are **S.A.F.E.**

**See it** - The hazards must be identified

**Assess it** - The degree of risk associated with the hazard must be assessed

**Fix it** - Control the risk by determining and implementing appropriate control measures

**Evaluate it** - Review or evaluate the effectiveness of the control implemented

### 4.1 IDENTIFY HAZARDS

Employers must take all reasonably practicable steps in consultation with employees to identify all potential health and safety hazards that could create a risk to any person at or near the workplace.

The hazard identification process must be conducted for the employer by a person who has acquired through training, qualifications or experience and/or a combination of knowledge and skills to carry out the task and in consultation with employees and clients, for each site prior to the work being undertaken. This *competent person* identifies the risks of each C-I-T job and provides the employer with a risk assessment report.

The hazard identification process must be applied to the whole system of work. As a minimum the following should be considered:

#### **General**

- consulting experienced staff about known hazards;
- consulting with C-I-T clients, associations, government bodies and occupational health and safety consultants on likely hazards; and
- consulting incident or injury records.

#### **Personnel**

- determining levels of training and experience required to perform the tasks;
- varying roles (e.g. driver, cash escort, cash carrier);
- work practices, systems of work; and
- shift working arrangements and other fatigue and stress related hazards.
- manual handling tasks (including the weight being carried);

## **Equipment**

- personal protective equipment (PPE) (e.g. firearms) and any other equipment required;
- systems of communication (e.g. back-to-base radio, mobile phones);
- type of transport; and
- regular testing of vehicles and equipment.

## **Environment**

- locations involved (e.g. client sites such as clubs and hotels, shopping centres, retail outlets, financial institutions and ATMs, proximity of parking to site, in the office etc);
- time of the day that the work is to be performed; and
- factors such as lighting, darkness, wet conditions, traffic and pedestrian flow etc.

## **Other**

- information provided by customers;
- previous incidents or hold ups that have occurred; and
- any other risk factors.

*TO ASSIST IN THE IDENTIFICATION OF HAZARDS SEE ATTACHMENT 1 – HEALTH AND SAFETY CHECKLIST*

## **4.2 ASSESS THE RISK**

Once a hazard has been identified the employer or other responsible person must assess the level of risk which the hazard poses to the health and safety of employees and others located at or near the workplace. That is, they must assess how likely it is that someone could be harmed by the hazard and the seriousness of the resulting injury or illness. Consultation with employees or other persons carrying out the work is to be a part of that assessment process.

In the case of an urgent “one-off-job”, a risk assessment must be conducted prior to accepting or undertaking the job. This must determine the level of risk posed and the appropriate methods of elimination and/or control of the risks. Depending on the circumstances a site visit may not be required.

The following must be considered when conducting a risk assessment:

- the likely hazards;
- the severity of the risk;
- the likelihood of an injury or illness occurring;
- the severity of that injury or illness;
- any factors that might contribute to the risk;

- any available health and safety information related to the hazard; and
- identification of the actions necessary to control the risk.

Upon completion of the risk assessment process, the competent person or the employer advises on:

- the method or system of work;
- the type of operation required (e.g. overt or covert);
- time of pick-up/delivery (e.g. whether the work to be performed is best suited to be conducted at a particular time, and if so, what time of day or period of time); and
- the frequency of collections to or from any one place.

The following table will assist in assessing the level of risk which the hazard poses to the health and safety of employees and others.

### Using the Assessment Table

- Determine the *likelihood* of the hazard occurring as listed in the left-hand margin.
- Determine the *consequence* of that hazard; will the consequences be severe, major, moderate or minor?
- Join the *likelihood* and the *consequence* to obtain the resulting *number*. This number identifies the level of risk for that activity.
- The lower the number, the higher the risk; for example, number 1 indicates an extreme risk while number 4 indicates a moderate risk.

ASSESSMENT TABLE				
LIKELIHOOD How likely could it happen?	CONSEQUENCES: How severely could it hurt someone?			
	SEVERE Death, permanent disablement	MAJOR Serious bodily injury	MODERATE Treatment in hospital	MINOR First aid only, no lost time
VERY LIKELY Could happen frequently	1	2	3	4
LIKELY Could happen occasionally	2	3	4	5
UNLIKELY Could happen, but rare	3	4	5	6
VERY UNLIKELY Could happen, probably never	4	5	6	6

Number Legend

1 → Extreme Risk  
2 → Very High Risk  
3 → High Risk

4 → Moderate Risk  
5 → Low Risk  
6 → Very Low Risk

### **4.3 CONTROL THE RISKS**

Under the OHS Act, the employer or person in control must also ensure that third parties at a workplace under the employer's control (customers, visitors, or passers-by) are not put at risk. In the C-I-T industry it is often the case that employees (persons in control) are responsible for the workplace, therefore it is their responsibility to protect the health, safety and welfare of others.

The onus is on the employer or responsible person to ensure that the person(s) engaged to undertake a risk assessment have the relevant knowledge and skills and/or qualifications.

In determining which method of risk management and control the employer can use for any specific job, the following should be considered:

#### **General**

- any harm/illness/injury that could be caused by any identified hazard; and
- mix of types of work being performed (e.g. patrol and security services being performed with C-I-T duties).

#### **Personnel**

- whether the employees involved should carry firearms;
- staffing levels; and
- the level of training, skill, knowledge, experience and qualifications of the persons carrying out the task.

#### **Equipment**

- suitability of type of transport/vehicles (e.g. armoured vs non-armoured vehicles);
- adequacy of communication systems (e.g. radio reception, 'black spots'); and
- suitability of PPE for the tasks (including the provision of firearms).

#### **Environment**

- locations involved (e.g. client sites such as clubs and hotels, shopping centres, retail outlets, financial institutions and ATMs, proximity of parking to site, in the office etc);
- time of the day that the work is to be performed; and
- factors such as lighting, darkness, wet conditions, traffic and pedestrian flow etc.

#### **Others**

- cash limits; and
- identification of any records that need to be kept to ensure the risk is eliminated or controlled.

Once the employer has been provided with the risk assessment report then it is his/her responsibility to take those steps that are *reasonably practicable* to control the risks identified.

#### **4.4 REASONABLY PRACTICABLE**

The act of assessing a risk often involves identifying the means of controlling that risk. A failure to then control the risk if *reasonably practicable* may result in a breach of the employer's duty of care. Among other considerations reasonable practicable takes into account:

- the severity of the hazard or risk in question;
- the state of knowledge about that hazard or risk and any relevant control;
- the availability of any control measures; and
- the cost of removing or mitigating the hazard or risk.

The test for what is *reasonably practicable* is determined in the courts on a case by case basis. However an objective exercise is for the employer to consider what a reasonable employer would do in the circumstances.

If a hazard creates a serious risk and that risk is greater than the difficulties and costs of its control, then the employer must remove that hazard. If the risk is negligible, but difficult and expensive to remove, the employer may be able to argue that it is not *reasonably practicable* to use that method to remove the hazard.

#### **4.5 EVALUATE AND REVIEW**

Management of risks is an ongoing process. It is a fundamental part of overall business management and just like other business activities must be checked and reviewed. To ensure that a workplace stays safe an employer must review the safety risk assessments undertaken and control measures implemented.

Employers should have adequate mechanisms in place for reviewing the effectiveness of the risk assessment process. While a regular 12-month review of the risk assessment processes will ensure that risk assessments continue to be relevant for the industry, reviews of established procedures should be undertaken when:

- there is evidence that the risk assessment is no longer valid such as when an incident or injury occurs or welfare of employees is adversely affected;
- when a change is planned to the place of work, work practices, or work procedures that may create additional risks;
- there are changes to technology or other advancement in the C-I-T industry; or
- the HSR requests a review.

When any risk assessment process is reviewed for its effectiveness, the employer should consult with the relevant employees and/or the HSR. The process of identification, assessment and determination of control measures should be repeated. Employees who are personally affected by the change must be consulted during the risk management process and informed of any new requirements at completion.

*TO ASSIST IN THE REVIEW SEE ATTACHMENT 2 – RISK ASSESSMENT REVIEW CHECKLIST*





## 5 SAFE OPERATING PROCEDURES

Safe operating procedures are to be developed based on the risk assessment for work in the C-I-T industry and these procedures must be readily accessible for all employees. These safe operating procedures are to be developed in consultation with employees conducting C-I-T work or their representatives and must set out who is accountable for each task.

Safe operating procedures should include but not be limited to, the following:

- clearly defined and communicated roles and duties of each employee performing the C-I-T operation (e.g. whether their role is as a driver, cash escort, cash carrier or guard);
- understanding of the other workers' duties to ensure cooperation, understanding and safety;
- pre-departure checklists, appropriate and regular testing of all safety features such as communication devices, duress alarms and firearms and regular inspections of the vehicles used;
- procedures to maintain confidentiality such as description of sites by code rather than name;
- variations in routes and delivery/pick up times to be undertaken where possible;
- welfare checks as part of normal operational requirements or to the radio control room as required;
- identification of radio reception 'black spots' and the implementation of alternative means of communication;
- procedures for arrival at sites (e.g. a checklist for the surveillance of the area surrounding the site and procedures to report any suspicious behaviours or alert employers of other potential hazards); surveillance procedures must take into consideration information supplied by the customer;
- procedures to defer pick up, or make arrangements for back up, in instances where suspicious behaviour or other potential hazards have been identified at the site;
- procedures for when a vehicle collision occurs and/or vehicle or equipment breakdown such as provisions for the securing of cash and if required, firearms (e.g. in the event of a guard requiring medical attention);
- cash limits – these are to be determined in accordance with the risk assessment and consideration be given to establishing limits when being carried across the footpath as well as held in the C-I-T vehicles; cash limits must also be determined on a single carry basis only and the distance to be carried;
- emergency procedures to apply in the event of a robbery, assault, or other incident, including procedures for the appropriate medical treatment of injured persons;
- arrangements for relieving persons responsible for the cash if they are injured in the course of the C-I-T operation;
- hazard and incident reporting procedures;

- manual handling procedures;
- hold-up and post hold-up procedures;
- measures to address fatigue and stress; and
- regular monitoring and review of procedures incorporating hazard and incident reports from employees, clients and the ACT Police.

## **6 PROVISION OF INFORMATION**

All *reasonably practicable* steps must be taken by the employer to ensure that employees are provided with any information, instruction and training necessary to ensure their health and safety.

Employers should make available for the use of their employee and in an easily accessible place, copies of any policies, relevant codes of practice and any safety risk assessment or review reports. All work must be performed in accordance with the relevant policies, codes and risk assessments.

When an employee first performs work at a new site the employer must brief that employee on the contents of any relevant risk assessments. These briefings should then occur at regular intervals to consider any changed conditions of that site that may affect health and safety. The frequency of these intervals is to be determined as part of the risk assessment.

Employees must have access to the safe operating procedures at the employer's base at any time including from the vehicle being driven by an employee. This could be by way of back-to-base radio or mobile phone or other such equipment which provides a communication link.

## **7 TRAINING AND SUPERVISION**

C-I-T work must not be carried out unless those performing the work have received appropriate information, instruction and adequate training.

### **7.1 INDUCTION TRAINING**

Employers must ensure that each new employee receives induction training that covers the following:

- arrangement at the place of work for the management of occupational health and safety, including arrangements to report hazards to management;
- health and safety procedures at the place of work relevant to the employee, including the use and maintenance of risk control measures;
- how employees can access health and safety information that the employer is required by the legislation to make available to employees; and

- any other matter that the legislation specifies should be the subject of induction training and that is relevant to the competence, experience and age of the employee.

## **7.2 OTHER TARGET GROUPS**

The needs of each target group are different, and the content and methods of presenting training material must be tailored to meet the specific needs of each group. As such the following should be taken into account:

- workplace OHS committees;
- employees who may be exposed to robbery at work;
- static guards;
- managers and supervisors of employees considered at risk of injury or work-related illness from robbery and/or who have responsibility for implementing safe operating procedures; and
- staff responsible for the purchasing of plant, PPE and for designing, scheduling and organising work activities.

## **7.3 TRAINING TOPICS**

Employers must include at least the following list of topics in a training process:

- the statutory responsibilities and obligations of employers and employees;
- the nature and extent of risks associated with the hazards identified;
- safe operating procedures and related policies, other risk control measures necessary to each employee's own job, instruction in the correct use of firearms and other measures that will minimise the risk or effects of robbery where applicable;
- when and how to use PPE including selection, fitting, proper care and maintenance;
- the processes for reporting defects in plant or deficiencies in workplace systems that are likely to increase the risk of robbery;
- confidentiality;
- the use of vehicles, plant and associated equipment;
- procedures to be adopted in the event of incident, injury or other emergency;
- what to do during a robbery;
- procedures for the appropriate medical treatment of injured persons;
- procedures for vehicle or equipment breakdown;
- stress management including the effects of robbery on affected employees;
- welfare; and
- behaviour during a robbery/serious incident.

The employer must review and monitor the systems of work and related control measures and provide refresher training on an annual basis to ensure those systems and safe operating procedures are being followed; this should also include the use of appropriate PPE.

## **7.4 SUPERVISION**

Employers must take all reasonably practicable steps to provide supervision necessary to ensure the health, safety and welfare of employees at work.

Supervisors must:

- ensure that employees performing C-I-T work have the relevant knowledge, skill and appropriate licences;
- ensure that those employees have acquired the knowledge and skills necessary to perform C-I-T work through qualifications, training and experience;
- ensure that adequate occupational health and safety management systems are in place and operating to ensure that the safe work practices have been adopted and are adhered to; including the use of PPE and firearms;
- review and monitor systems and control measures; and
- provide refresher training on procedures, safe systems of work, PPE on an annual basis.

A person who is gaining experience to provide any C-I-T service (overt or covert) must be under the direct supervision of a competent person for either a minimum of three months or until such time as the new employee demonstrates competence to a competent person.

## **8 INCIDENTS**

### **8.1 INCIDENT REPORTING**

Under the OHS Act, the employer must notify ACT WorkCover of dangerous occurrences and/or serious injury that results in the employee being unfit for work for 7 days. The death, injury or dangerous occurrence is notifiable if it occurred at or near the workplace and is attributable to the conduct of the employer's undertaking at the workplace.

Notice to WorkCover must be given as soon as practicable in writing, but no later than 7 days after the employer becomes aware of the situation. The employer must retain a copy of the notice in a bound book or in loose-leaf form for a period of at least five years after the date the notice is given.

### **8.2 PROCEDURES IN THE EVENT OF A SERIOUS INCIDENT OR ATTEMPTED ROBBERY**

The personal safety of employees and others involved in, or witnessing, a robbery is paramount.

Employers must have procedures for maintaining personal and public safety during an incident and provide training on those procedures. Following a hold-up it is important to have procedures in place so that first aid can be administered, traumatised persons can be treated quickly and appropriately, and the relevant authorities contacted.

### **8.3 ROBBERY OR VIOLENT INCIDENT PROCEDURES**

In the event of a robbery it is important that everyone remains calm and that no action is taken that may jeopardise personal or public safety.

Employers are to provide training and information to their employees on how to respond while a robbery or violent incident is occurring. This training should be incorporated as part of each organisation's standard operating procedures.

Survival is the number one priority during a robbery or violent incident. These simple rules should be followed to reduce the likelihood of injury if an incident occurs.

*TO ASSIST SEE ATTACHMENT 3 – INCIDENT RESPONSE FLOW CHART*

#### **Action After the Incident**

As soon as it is safe to do so the most senior available staff member must ring the Police and if necessary the Ambulance on the emergency number 000. Details given to the Police during the call should include the exact location of the robbery, direction in which the robber is travelling, a description of the robber(s), and your name;

Injured and/or traumatised employees should be given first aid;

As soon as possible after calling the police, 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 than an allegedly complete description which is based on conjecture and guesswork.

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

Ask any witnesses to wait until the police arrive so they may give a description of the robber(s). If they are unable to remain at the scene, get their names, phone numbers and addresses.

Do not discuss the details of the robbery with witnesses or fellow employees 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 ensure a person holding a firearm licence secures the firearm of an injured or fatally injured guard.

## **Further Action**

After the incident, allow employees to contact their families to advise them of the situation. Inform all employees about what has occurred and update them as necessary.

If an employee is unable to contact their family due to an injury, then a manager/supervisor should contact the employee's family.

It is the responsibility of the employer to offer counselling to all employees after a violent incident has occurred.

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

Encourage employees to resume normal duties as soon as possible. Seek professional guidance on rehabilitation options. It is up to a doctor, psychiatrist or psychologist in conjunction with the employee to make a decision about returning to work.

Employers, managers, supervisors and colleagues must have an awareness of the complexity of reactions to armed hold-up as the short- and long-term psychological effects of being confronted with violence can be severe and in many cases debilitating.

Each person will react differently to a violent incident. A range of symptoms can develop following a threat of physical violence or, in some cases, when working in an environment where there is a likelihood of violence.

## **9 RECORD KEEPING**

Under the OHS Act, an employer must take all *reasonably practicable* steps to maintain appropriate information and records relating to the employees' health and safety.

These records include, but are not limited to:

- the processes used to identify risks including work-sheets and checklists;
- the process and methods used to assess these risks;
- the activities used to eliminate and/or control risks;
- any reviews of systems of work;
- any health and safety audits;
- first aid and accident reports;
- the health and safety training of employees;

- plant maintenance logs; and
- incident reports.

## **10 PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Employers or persons in control must take all *reasonably practicable* steps to ensure that each person at risk is supplied with any PPE as required by the risk assessments. PPE must be appropriate for the person and appropriate to the risk. Employers must not charge employees for PPE.

Equipment supplied to employees and others conducting C-I-T operations may include, but not be limited to:

- firearms in a holster with a locking strap in the case of overt operations, or as required by a risk assessment in the case of a covert operation;
- back-to-base communication equipment;
- personal duress alarms; and
- non-slip footwear.

## **11 COMMUNICATIONS SYSTEMS**

Employers must ensure that arrangements have been made for appropriate communications for the safe conduct of C-I-T operations including emergency communications in both armoured and softskin vehicle operations as well as covert or overt operations.

C-I-T work must be conducted in vehicles with adequate back-to-base communication equipment or other communication devices as required by the risk assessment. This must include personal duress alarms and may include a global positioning system.

Communication failures and radio reception ‘black spots’ are hazards that increase the risk to workers and must be identified and control strategies put in place by each organisation.

## **12 SELECTION OF VEHICLES AND EQUIPMENT**

Vehicles and other equipment for a particular site must be selected in accordance with the risk assessment.

Vehicles and other equipment such as firearms and communication devices that are used in C-I-T operations must:

- conform to Australian Design Requirements and/or Australian Standards;
- be mechanically sound; and



- be serviced and maintained regularly and adequately to ensure continued user safety.

Repairs, alterations and maintenance must be carried out by a fully qualified trade person in the relevant field of trade in accordance with the designers or manufacturer's requirements. Any defects to equipment must be reported immediately to the person responsible for maintaining such equipment.

### **13 NON-ARMoured VEHICLES – SAFETY FEATURES**

Non-armoured (soft-skin) vehicles used for C-I-T operations must include at least the following safety features as minimum safety requirements:

- drop safe, which is secured to the interior of the vehicle;
- appropriate communication systems for safe operating procedures; and
- engine immobiliser.

Vehicles used for covert work shall not bear markings that distinguish them as C-I-T vehicles.

### **14 STAFFING LEVELS**

The number of persons staffing vehicles used for C-I-T operations must be determined in accordance with the risk assessment processes and relevant court decisions.

### **15 CASH LIMITS**

Cash limits for each C-I-T operation are to be determined in accordance with the risk assessment, industry operational needs and insurance provider requirements.

### **16 DUTIES OF OTHERS**

#### **16.1 CLIENTS**

The C-I-T client should take into account the need to minimise the risk of armed robbery when deciding on the location of ATMs and the method by which cash collections or deliveries will be done on their premises. Client organisations should consult with the C-I-T operators with the view to introducing appropriate strategies to reduce the risk of armed robbery and where necessary undertake a risk assessment.

Reduction of the risk of armed robbery can be achieved by considering such factors as:

- disclosing any history of attempted robbery, robbery or other such incidents to the C-I-T operator as well as any other risk factors related to the pick-up and delivery of cash;
- the identification of the most secure access and egress routes to and from the premises and ATM locations;
- identify safe and secure vehicle parking and pedestrian access;
- the installation or position of other security features, e.g. closed circuit television (CCTV), security personnel, alarms etc;
- ensuring that there is adequate lighting near ATMs and throughout access/egress routes; and
- appropriate duress alarm devices are installed in or near cash collection and delivery points and ATM locations.

## **16.2 CHAIN OF RESPONSIBILITY AND SUB-CONTRACTING**

When contracting out C-I-T work to sub-contractors, C-I-T operators must ensure that the sub-contractor is carrying out the work in a safe manner and in accordance with this Code of Practice. Either the contractor or the sub-contractor is to undertake a job specific risk assessment and the findings are to be shared between all stakeholders.

In the case of an urgent “one-off-job” a risk assessment must be conducted prior to accepting or undertaking the job. This must determine the level of risk posed and the appropriate methods of elimination and/or control of the risks. Depending on the circumstances a site visit may not be required.

When performing C-I-T work, a sub-contractor should be advised to make a written record of the:

- name, address and the Australian Business Number (ABN) and/or Australian Company Number (ACN) of the employer, entity or person who has requested the sub-contract;
- date of giving out the work and date for completion or cessation of the contract; and
- a description of the nature of the work to be performed, in particular the destination from and to which the cash is to be transported and the value of the cash to be transported.

A copy of these documents should be kept in accordance with this Code of Practice and be given to the sub-contractor who performs part of all of the work.

Where an employer gives out work to more than one employer, entity or person(s), an up-to-date consolidated list should be kept by the originating employer that contains sufficient information to satisfy the requirements of this Code.

If a C-I-T operator contracts with another person(s) who alone will carry out the work, the originating employer must provide the same safe work systems as if that person(s) was an employee.

## **16.3 MANUFACTURERS**

Manufacturers have a duty of care to ensure that any plant is designed and constructed in such a way that it can be used without risk to the health and/or safety of those employed to undertake C-I-T activities.

Manufacturers supplying plant and equipment for use by C-I-T operators should collaborate with the C-I-T operator to reduce the industry specific hazards.

Reducing any identified hazards can be achieved by:

- testing or examining plant to ensure that there is no risk to the health and safety of C-I-T operators;
- making available to the C-I-T operator adequate information concerning the use for which the plant was designed and tested;
- providing information on the proper maintenance of the plant;
- vehicle loading docks are considered when designing structures;
- open glass fronts are used in buildings to allow clear visibility;
- the transfer of valuables can be achieved without exposure to the public such as when crossing the footpath;
- strong exterior and interior lighting is used in and around the building; and
- security devices such as cameras are located in a prominent area to ensure the public is aware that such devices exist.

## **17 ADDITIONAL CONSIDERATIONS**

### **17.1 MANUAL HANDLING**

Manual handling means any activity requiring the use of force exerted by a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any animate or inanimate object. The risk assessment evaluation must report on the manual handling requirements as part of the general assessment process.

Under the Occupational Health and Safety (Manual Handling) Regulations 1997 (Manual Handling Regulations) the employer or the person in control of the workplace is to ensure that all reasonably practicable steps are taken to ensure that:

- that plant, equipment and containers that may be manually handled are safe when manually handled;
- that work practices involving manual handling are designed to be safe; and
- that the working environment is designed to be consistent with safe manual handling activities.

Employers and persons in control of workplaces must also follow the *ACT Manual Handling Code of Practice* (Manual Handling Code) and to take all reasonably

practicable steps to ensure that it is followed unless there is an alternative course of action which achieves the same or better standard of health and safety in the workplace.

There are three steps to safe manual handling. The manual handling regulations and the Manual Handling Code provide a systematic approach to remove all the hazards involved in manual handling. Employers and persons in control of workplaces must involve workers and their HSRs in this process of consultation.

*TO ASSIST WITH MANUAL HANDLING ASSESSMENTS SEE ATTACHMENT 4 – MANUAL HANDLING CHECKLIST*

To fulfil the obligation under the OHS Act, the Manual Handling Regulations and the Manual Handling Code, employers or persons in control of workplaces must take all reasonably practicable steps to ensure that adequate training is provided in safe manual handling. This training should be made available to all employees including managers, supervisors, HSRs and staff responsible for the organisation of work systems.

## **17.2 FIRST AID**

Under the OHS Act, employers must take all reasonably practicable steps to ensure that they provide appropriate medical and first aid services for the employees.

Procedures for the appropriate medical treatment of injured persons, the administration of first aid and the contents of first aid kits must be determined in accordance with the safety risk assessments and meet or better the requirements in the *ACT First Aid in the Workplace Code of Practice*. This Code prescribes the minimum contents of first aid kit.

## **17.3 AMENITIES**

The OHS Act requires that employers and persons in control of workplaces provided and maintain adequate facilities for employees welfare while they are at work.

To fulfil this duty, employers and persons in control of workplaces should refer to all relevant regulatory material and relevant codes of practice. These include but are not limited to:

- *Public Health Act 1997*
- ACT Construction Industries Amenities Code of Practice
- The Building Code of Australia (ACT Appendix).

## **18 DEFINITIONS**

In this Code of Practice:

**Armoured vehicle operations** means the transport of cash in purpose-designed vehicles that offer resistance to armed attack, that may or may not overtly display the company signage and are staffed by armed, uniformed personnel.

**ATMs** means automatic teller machines.

**Cash** means cash (other than coin), securities and other financial instruments (other than executed non-negotiable cheques and executed bank cheques), jewels and bullion.

**C-I-T client** means any person, partnership or company that uses the services of a licensed C-I-T operator.

**C-I-T operator** means an employer or self-employed person engaged in the carrying of cash for reward for C-I-T clients.

**C-I-T operations** means services involving the carrying or transporting of cash by a C-I-T operator on behalf of C-I-T clients.

**C-I-T** means Cash-in-Transit operations and activities.

**Competent person** means a person who has acquired through training, qualifications or experience, and/or a combination of knowledge and skills to carry out the task. Under *Cash Transit Industry Code of Practice* (under the *Fair Trading Act 1992*) competency is defined as: ... if training under competency based industry standards has been approved in accordance with Commonwealth or Territory law, a person is deemed to be capable of providing a cash transit service if that person: (a) has successfully undertaken that training and provides the service at a level appropriate to that training; or (b) is licensed to provide the cash transit service under the law of another jurisdiction and provides the service at a level appropriate to that registration.

**Controller of premises** means a person who has control of premises used by people as a place of work, including a person who has only limited control of the premises, and under any contract or lease, an obligation to maintain or repair the premises.

**Covert** means the transport of valuables in an unmarked vehicle by non-uniformed, armed/unarmed personnel.

**Employee** means a natural person who is employed under a contract of service.

**Employer** means a person who employs a natural person under a contract of service.

**Hazard** means something with the potential to cause harm or to adversely affect the health of people. Anything which may cause harm, through injury or ill health, to anyone at, or near a workplace is a hazard. This can include substances, plant, work processes and/or other aspects of the work environment.

**Injury** includes the contraction of a disease and the aggravation acceleration or recurrence of an injury or a disease.

**Manual handling** means any activity requiring the use of force exerted by a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any animate or inanimate object.

**Multiple carry** means more than one conveyance of cash between vehicle and premises serviced.

**Person(s) in control** means the same as controller of premises or person in control of workplaces under section 29(1) of the OHS Act.

**Personal protective equipment (PPE)** means any equipment or substance (such as sun protection cream) used to protect health and safety.

**Plant** includes machinery, equipment, appliance, pressure vessel, implement and tool, and a component of plant and a fitting, connection, accessory or adjunct to the plant.

**Reasonably practicable steps** means that the employer should test what would be reasonably practicable in each case. This is however an objective exercise in the sense that it requires the employer to consider what a reasonable employer would do in the circumstances. To determine what is reasonably practicable the following questions can be asked and then answered:

- What is the likelihood of the hazard occurring?
- What might be the consequences of a hazardous incident?
- What would be the severity of the consequence of the harm done and the costs involved?
- What are the means of removing the hazard?
- What are the resources required to impellent those means, including the costs involved?

If a hazard creates a serious risk and that risk is greater than the difficulties and costs of its removal, then the employer must remove that hazard. If the risk is negligible, but difficult and expensive to remove, the employer may be able to argue that it is not reasonably practicable to use that method to remove the hazard.

The act of identifying a hazard often involves identifying the means of removal and in that case a failure to remove the hazard, if reasonably practicable, would be a breach of the employer's duty.

**Relevant regulatory material** includes:

- *Workers Compensation Act 1951*
- *Occupational Health and Safety Act 1989*
- Occupational Health and Safety Regulations 1991
- Occupational Health and Safety (Manual Handling) Regulations 1997

- *Firearms Act 1996*
- *Fair Trading Act 1992*
- *Public Health Act 1997*
- *Road Transport (General) Act 1999*
- *Road Transport (Safety and Traffic Management Act) 1999*
- *Truck Act 1900*
- The Building Code of Australia (ACT Appendix)

**Relevant codes of practice** include:

- Cash Transit Industry: Code of Practice (under the *Fair Trading Act 1992*)
- ACT Manual Handling Code of Practice
- ACT Construction Industries Amenities Code of Practice

**Risk** is measured in terms of consequence and likelihood of something happening that will have an impact on the health and safety of employees.

**Safe area** refers to the location of ATMs where safe access and egress is available for those involved in C-I-T and to the members of the public using them.

**Self-employed person** means a natural person who works for gain or reward otherwise than as an employee (whether or not he or she employs another person).

**Single carry** means one conveyance only of cash between the vehicle and the premises serviced.

**Softskin vehicle operations** means the transport of cash in a non-armoured vehicle.

**Standard operating procedures** means those industry-accepted procedures that C-I-T operators accept as part of their normal work practices.

**Trained first aid personnel** means a person who holds a current first aid certificate, a current occupational first aid certificate issued after successful completion of an approved occupational first aid course; an ACT Ambulance officer; a registered nurse; or a medical practitioner.

**Workplace** means any premises where employees or self-employed persons work.



## ATTACHMENT 1: HEALTH AND SAFETY CHECKLIST

The following example of a health and safety checklist may be used as a guide to focus on the risk factors associated with the C-I-T Industry. This list is not exclusive and can be adapted to suit individual company needs.

Client Name: _____ Client Contract Description: _____
Employer: _____ Site Location: _____
Date: _____ Persons completing inspection: _____

Indicate in the following manner: (V) Acceptable (X) Not Acceptable (N/A) Not Applicable  
An indication of (X) will require a corrective action to be implemented in the timeframe allocated

### 1. Health and Safety Management Systems

- (a) Health & safety management plan
- (b) Assigned responsibilities for workplace health and safety
- (c) Employee induction records
- (d) Documented safe work policies and procedures covering armed hold ups
- (e) Review and monitor procedures at regular intervals
- (f) Operations manual for C-I-T employees
- (g) Individual client site survey records
- (h) Hazard audit records
- (i) Job scheduling and job design review records
- (j) Training/refresher records for management and employees
- (k) Events log records
- (l) Debriefing records

### 2. Client Site Assessment

- (a) Safe access provided
- (b) Dedicated parking provided
- (c) Security cameras in use
- (d) Strong exterior and interior lighting provided
- (e) Vehicle loading docks provided
- (f) Open glass frontage provided for clear visibility
- (g) Distress buttons connected to local police
- (h) ATMs positioned in safe areas
- (i) Public safety considered in the vicinity of C-I-T operations
- (j) The incidence of crimes in the area or district are reported
- (k) Past history of robberies of that client site or similar sites in the area are reported

### **3. Vehicles and Equipment**

- (a) Vehicles maintained in good mechanical condition
- (b) Softskin vehicles fitted with vehicle safe
- (c) Appropriate communication systems installed
- (c) Alarms fitted
- (d) Weapons secured when not in use
- (e) Weapons maintained in a good mechanical condition

### **4. C-I-T Workforce**

- (a) Agreed competencies
- (b) Induction
- (c) Initial education and training/refresher training on procedures and weapons handling
- (d) Initial education and training/refresher training on behaviour prior to, during and following a robbery or violent incident
- (e) Occupational health and safety employee representatives elected
- (f) Occupational health and safety committee formed
- (g) Ratio of manning levels to tasks
- (h) Armed hold ups prevention audits (review of practices)
- (i) Testing of armed hold ups prevention procedures
- (j) Maintenance of events log
- (k) Communication procedures audits
- (l) Debriefing sessions
- (m) Staff performance appraisals
- (n) Resources for post hold up support, e.g. trauma counselling and return to work issues

### **5. Personal Protection (General and specialised)**

- (a) PPE maintained
- (b) Employees provided with PPE
- (c) Instruction in the use of PPE
- (d) PPE being worn by employees

### **6. Manual Handling**

- (a) Mechanical aids provided and used
- (b) Safe work procedures in place
- (c) Manual handling risk assessment performed

### **7. Public Safety**

- (a) Use of armoured vehicles whenever possible
- (b) Use of disciplined and armed crews
- (c) Adherence to rigid safety procedures
- (d) Recognition and avoidance of dangerous situations

**8. First Aid**

- (a) First aid kits provided in each work area and vehicle
- (b) Training of first aid for selected employees

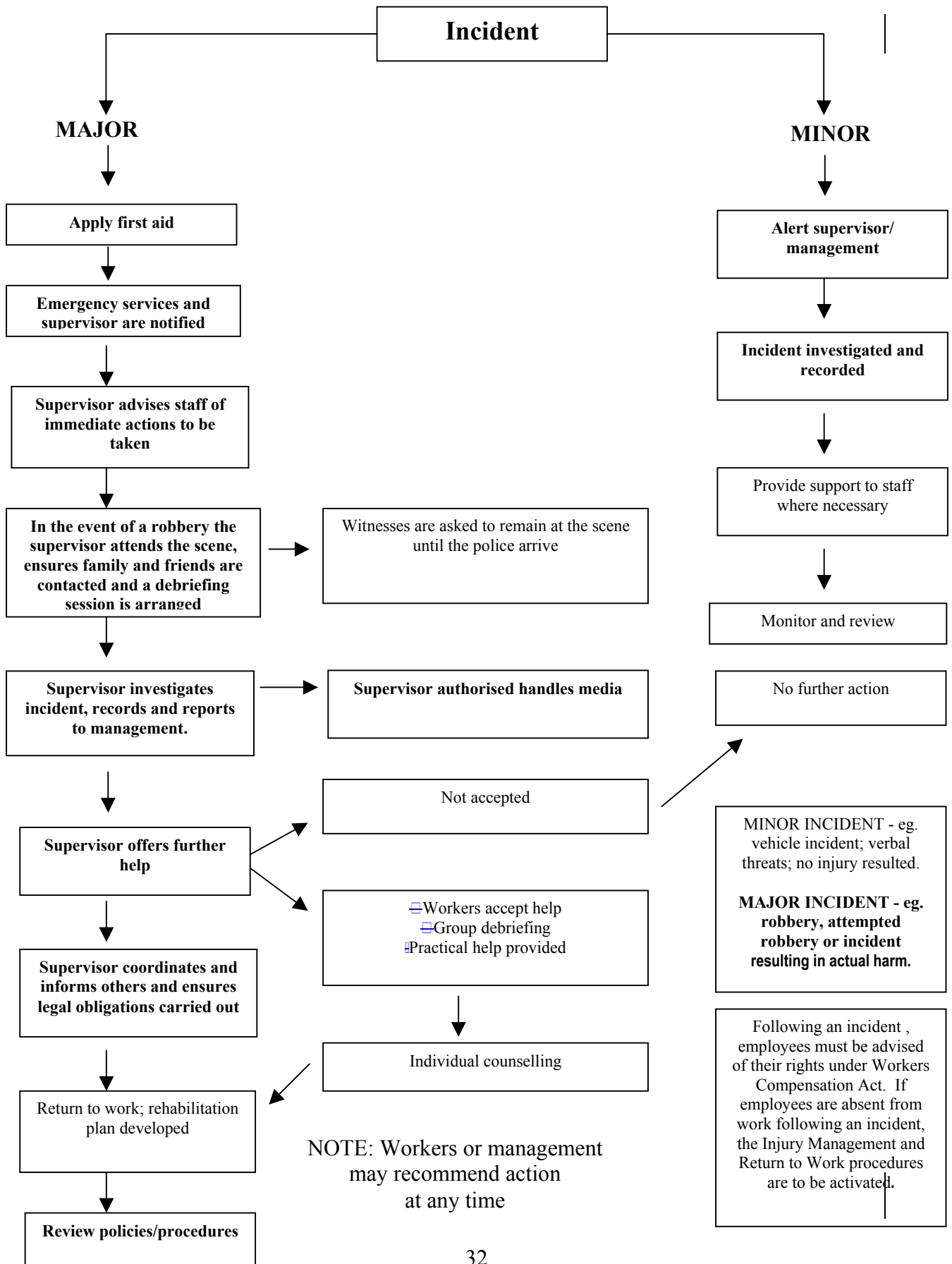
**9. Amenities**

- (a) Washrooms clean
- (b) Toilets clean
- (c) Meal area is clean and tidy

## ATTACHMENT 2: RISK ASSESSMENT REVIEW CHECKLIST

RISK ASSESSMENT REVIEW CHECKLIST		
	YES	NO
Have the risk control measures been implemented as outlined in the risk assessment?		
Are these control measures being used?		
Are these control measures being used correctly?		
Have the risks been eliminated or adequately reduced?		
Have any recently implemented risk control measures introduced new hazards?		
Has the implementation of risk control measures resulted in the worsening of any existing hazards?		
Has the risk assessment achieved a safe working environment?		
Are there any new risks associated with C-I-T activities?		
Are the current control measures effective?		
Is a new risk assessment required?		

### ATTACHMENT 3: INCIDENT RESPONSE FLOW CHART



NOTE: Workers or management may recommend action at any time

## ATTACHMENT 4: MANUAL HANDLING CHECKLIST

<b>MANUAL HANDLING CHECKLIST</b>	
<b>Step 1 Overview</b>	<ul style="list-style-type: none"> <li>Identify the risks by analysing workplace injury records. This can be done through director observation or with discussions with employees and their representatives.</li> </ul>
<b>Step 2 Assess Risks</b>	<ul style="list-style-type: none"> <li>Observe actions and movements, workplace and work station layout.</li> <li>Observe working posture and position.</li> <li>What is the duration and frequency of manual handling?</li> <li>Where is the load location and what is the distance moved?</li> <li>Assess weights and forces.</li> <li>What are the characteristics of the load and other equipment used?</li> <li>How is the work organised.</li> <li>What is the work environment?</li> <li>Are the skills and experience relevant?</li> <li>Are there any special personal characteristics?</li> <li>Is special clothing needed?</li> <li>Any special needs?</li> </ul>
<b>Step 3 Eliminate or Reduce Risks</b>	<p><i>Job Redesign</i></p> <ul style="list-style-type: none"> <li>Modify object.</li> <li>Modify workplace layout.</li> <li>Change actions, movement, forces.</li> <li>Rearrange materials flow.</li> <li>Modify task – use mechanical assistance.</li> <li>Modify task – use team lifting.</li> </ul> <p><i>Mechanical Handling Equipment</i></p> <ul style="list-style-type: none"> <li>Provide mechanical handling equipment.</li> </ul> <p><i>Training</i></p> <ul style="list-style-type: none"> <li>Identify manual handling training needs.</li> <li>Provide training in the principles of correct manual handling and lifting.</li> </ul> <p><i>Other Administrative Controls</i></p> <ul style="list-style-type: none"> <li>Provide any special needs.</li> <li>Provide specific clothing.</li> </ul>