

Australian Capital Territory

# Work Health and Safety (Transport and Delivery of Cash) Code of Practice 2011\*

## Notifiable instrument NI 2011 - 771

made under the

*Work Health and Safety Act 2011*, section 274 (Approved Codes of Practice)

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### 1 Name of instrument

This instrument is the Work Health and Safety (Transport and Delivery of Cash) Code of Practice 2011.

### 2 Commencement

This instrument commences on 1 January 2012.

### 3 Code of Practice Approval

Under section 274 of the *Work Health and Safety Act 2011* (the Act), and being satisfied that this code of practice was developed in accordance with the process described in s274 (2) of the Act, I approve the ACT Work Health and Safety (Transport and Delivery of Cash) Code of Practice 2011.

Dr Chris Bourke  
Minister for Industrial Relations  
15 December 2011

\*Name amended under Legislation Act, s 60



OFFICE OF REGULATORY SERVICES  
DEPARTMENT OF JUSTICE & COMMUNITY SAFETY

# Transport and Delivery of Cash

Code of Practice

DECEMBER 2011

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# 1

## INTRODUCTION

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### 1.1 TITLE

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

### 1.2 COMMENCEMENT

This Code of Practice is to commence on the day after notification.

### 1.3 AUTHORITY

This code of practice is approved in accordance with Section 274 of the *Work Health and Safety Act 2011 (the Act)*.

Codes of practice are designed to be used in conjunction with the Act and associated regulations. Codes of practice can be called upon during legal proceedings and can be called on to show that a person has failed to meet a standard specified in the Act or a regulation.

Where there is a breach of the Act an Inspector appointed under the Act may cite a relevant code of practice when issuing an Improvement or Prohibition Notice. Failure to comply with an Improvement or Prohibition Notice is an offence under the Act.

### 1.4 APPLICATION, REGULATION AND SCOPE

The Office of Regulatory Services promotes workplace health and safety through education, liaison with community and government bodies as well as the enforcement of the The Act and associated regulations.

The Commissioner for Fair Trading regulates the licensing of persons involved in Cash in Transit (C-I-T) activities. This includes receiving applications and registration fees, processing applications, notifying each applicant of the outcome of the application, and deregistering workers 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:

- persons conducting a business or undertaking (including employers and sub-contractors);
- persons in control; and
- workers.

### 1.5 PURPOSE

This Code of Practice provides guidance to prevent injury and illness to persons engaged in C-I-T operations and work. It also provides practical guidance on implementing the requirements of the The 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 persons in control, workers, contractors and sub-contractors; and
- protect persons at or near workplaces from risks to health or safety arising out of the activities of workers at work.

*1.6 THE TRANSPORT AND DELIVERY OF CASH*

The C-I-T operations is any service whereby a person or persons transport 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.



The 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 WORK SAFETY DUTIES FOR PERSONS CONDUCTING A BUSINESS OR UNDERTAKING*

A person conducting a business or undertaking must ensure work safety by managing risks. This includes safe systems of work and providing workers with safe equipment and materials. The person in control of the business or undertaking must provide appropriate information, instruction, training or supervision to workers and other people at the business or undertaking to allow work to be carried out safely. This includes the resources to implement and support safe work practices as well as ensure that workers are informed about and are involved in, health and safety issues.

A person conducting a business or undertaking is responsible for the development of work safety policies and related documentation, and to ensure that these documents are kept up-to-date.

The meaning of a person conducting business or undertaking for the purpose of this code includes:

- 1 employer
- 2 self-employed person
- 3 municipal corporation
- 4 sub-contractor

*2.2 work safety duties for PERSON IN CONTROL OF premises*

Under the WS Act, persons in control of premises, which can include the person conducting the business or undertaking, must take all reasonably practicable steps to ensure that the workplace, access to and egress from the workplace, as well as plant and/or substances 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 WORK SAFETY DUTIES FOR SUB-CONTRACTOR*

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

Sub-contractors who have engaged people as workers, have the same work safety duties as a person conducting the business or undertaking.



2.4 *WORK SAFETY DUTIES FOR THE WORKER*

Under the Act workers are required to follow safety procedures and instructions and participate in safety training provided by persons in control. Workers must use the safety equipment provided by the persons in control and take all reasonably practicable steps to report any risk, illness and injury, connected with work, that the worker is aware of.



## 3

## CONSULTATION AT THE WORKPLACE

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The Act requires employers to take all reasonably practicable steps to consult with workers 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 Work Safety Representative (WSR) as soon as possible on any changes planned for the workplace where those changes may affect the health and safety of any worker.

### 3.1 STAKEHOLDER INVOLVEMENT

The involvement of workers in the risk management process is an essential step in achieving work safety. The information in this Code of Practice should be used when consulting with workers (whether directly or through their WSR, 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 Work Safety Committee (WS Committee), where it exists, as well as other methods of communication. Employers should use these opportunities to encourage workers to discuss work safety issues as well as identify problems and possible solutions.

To achieve good health and safety outcomes, employers should:

- consult with either the elected/selected WSR, WS Committee (if any) or involved union(s);
- consult with each involved union in relation to the established Worker Consultation Unit;
- document issues raised and decisions reached;
- demonstrate commitment;
- encourage workers 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 co-operation, problems may still arise when there are disagreements between employers and workers on work safety issues.

If employers and workers cannot reach an agreement on work safety issues, then they should utilise the services of their WSR or the WS Committee (if any). If the consultation process fails to resolve a work safety issue, the WSR has the power to issue a Provisional Improvement Notice (PIN). Issuing a PIN is a formal process that involves notifying WorkSafe ACT. 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, work safety professionals or WorkSafe ACT.

Persons conducting a business or undertaking or persons in control 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 person conducting a business or undertaking or person in control 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

Persons conducting a business or undertaking or persons in control must take all reasonably practicable steps in consultation with workers to identify all potential work safety hazards that could create a risk to any person at or near the workplace.

The hazard identification process must be conducted for the person conducting the business or undertaking 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 workers 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 person conducting a business or undertaking 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 work 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 and safety equipment (PPSE) (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 - WORK SAFETY CHECKLIST

#### 4.2 ASSESS THE RISK

Once a hazard has been identified the person conducting a business or undertaking or the person in control must assess the level of risk which the hazard poses to the health and safety of workers 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 workers 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 person in control 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 workers 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	4	→	Moderate Risk
2	→	Very High Risk	5	→	Low Risk
3	→	High Risk	6	→	Very Low Risk

4.3 RISK CONTROL MEASURES

The best way to control a hazard is to remove it. If this is not practicable, the risk should be reduced as much as possible by applying the other approaches in the *hierarchy of controls* listed below.

Control measures near the top of this hierarchy (e.g. elimination) are more effective than those near the bottom, and should therefore be adopted wherever practicable. Control measures near the bottom of the hierarchy (e.g. administrative controls) are more difficult to maintain, and should be regarded only as interim measures until more permanent controls can be implemented.

If elimination of a risk is not possible, the person conducting a business or undertaking or person in control should assess whether the next preferred control measure in the hierarchy (substitution) can be achieved, and so on (through isolation controls, etc) until the highest-ranking practicable control measure which can be achieved has been identified.

The control measures in the hierarchy of controls are not mutually exclusive. In many cases, it will be appropriate to implement a combination of control measures to reduce exposure as much as possible.



## The Hierarchy of Controls

### Elimination

This control completely removes the hazard and is the ideal solution.

### Substitution

This is where a hazard is replaced by a less hazardous alternative

### Isolation

This involves separating the hazard from people, either by using physical barriers to contain or enclose the hazard or by a separation in distance or time.

### Administrative controls

If a health and safety risk still remains, administrative control should be used. This involves using work practices which reduce the risk by limiting the exposure of workers to the hazard. This could involve rotating workers on tasks that are repetitive and strenuous.

### Personal protective and safety equipment

Personal protective and safety equipment (PPSE) is categorised by the area of the body it protects, and includes protection for the head, eyes, ears, hands, feet and respiratory system. It also includes fall protection devices.

PPSE should be relied upon only where other measures fail to eliminate the risk.

It is often difficult to fully protect workers with personal protective equipment, because they may need to wear several items which affect comfort and restrict performance. But even though workers may be reluctant to wear PPSE as intended; the risk of secondary injury from PPSE, such as skin rash or heat stress caused by unsuitable clothing and hot conditions, has been assessed.

In determining which method of risk management and control can be used 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 workers 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 PPSE 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 person conducting a business or undertaking or person in control has been provided with the risk assessment report then it is their responsibility to take those steps that are reasonably practicable to control the risks identified.

#### 4.4 REASONABLY PRACTICABLE

Assessing a risk often involves identifying the means of controlling that risk. Among other considerations reasonable practicable steps takes into account:

- the seriousness of the risk;
- the availability and suitability of ways to eliminate or minimise the risk;
- what the duty holder knows or ought reasonably to know about—
  - the hazard giving rise to the risk and the risk itself; and
  - ways of eliminating or minimising the risk; and
- the cost of eliminating or minimising the risk.

If a hazard creates a serious risk and that risk is greater than the difficulties and costs of its control, then the person conducting a business or undertaking or person in control must remove that hazard. If the risk is

negligible, but difficult and expensive to remove, the person conducting a business or undertaking or person in control 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 person conducting a business or undertaking or person in control must review the safety risk assessments undertaken and control measures implemented.

Persons conducting a business or undertaking or persons in control 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 workers 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 WSR requests a review.

When any risk assessment process is reviewed for its effectiveness, the person conducting a business or undertaking or person in control should consult with the relevant workers, and/or the WSR. The process of identification, assessment and determination of control measures should be repeated. Workers 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



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 workers. These safe operating procedures are to be developed in consultation with workers conducting C-I-T work or their WSR, 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 worker 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 co-operation, 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 persons in control 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 workers, clients and the ACT Police.



All *reasonably practicable* steps must be taken by the person conducting a business or undertaking to ensure workers are provided with any information, instruction and training necessary to ensure their health and safety.

Persons conducting a business or undertaking or persons in control should make available for the use of their workers, copies of any policies, relevant codes of practice and any safety risk assessment or review reports. These documents must be available in an easily accessible place. All work must be performed in accordance with the relevant policies, codes and risk assessments.

When a worker first performs work at a new site the person conducting the business or undertaking or person in control must brief that worker 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.

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





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*

Persons conducting a business or undertaking or persons in control must ensure that each new worker receives induction training that covers the following:

- arrangement at the place of work for the management of work safety, including arrangements to report hazards to management;
- work safety procedures at the place of work relevant to the worker, including the use and maintenance of risk control measures;
- how workers can access work safety information that the person conducting the business or undertaking is required by the legislation to make available to workers; 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 worker.

*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 WS committees;
- workers who may be exposed to robbery at work;
- static guards;
- managers and supervisors of workers 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, PPSE and for designing, scheduling and organising work activities.

*7.3 TRAINING TOPICS*

Persons conducting a business or undertaking or persons in control must include at least the following list of topics in a training process:

- the statutory responsibilities and obligations of persons in control and workers;
- the nature and extent of risks associated with the hazards identified;

- safe operating procedures and related policies, other risk control measures necessary to each worker'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 PPSE 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 workers;
- welfare; and
- behaviour during a robbery/serious incident.

The person conducting a business or undertaking or person in control 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 PPSE.

#### 7.4 SUPERVISION

Persons conducting a business or undertaking or persons in control must take all reasonably practicable steps to provide supervision necessary to ensure the health, safety and welfare of workers at work.

Supervisors must:

- ensure that workers performing C-I-T work have the relevant knowledge, skill and appropriate licences;
- ensure that those workers have acquired the knowledge and skills necessary to perform C-I-T work through qualifications, training and experience;
- ensure that adequate work 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 PPSE and firearms;

- review and monitor systems and control measures; and
- provide refresher training on procedures, safe systems of work, and PPSE 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 worker demonstrates competence to a competent person.



## 8

## INCIDENTS

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### *8.1 INCIDENT REPORTING*

Under the WS Act, person in control must notify WorkSafe ACT of dangerous occurrences and/or serious event that results in the worker being unfit for work for 7 days.

The serious event or dangerous occurrence is notifiable if it occurred at or near the workplace and is attributable to the conduct of the person conducting a business or undertaking's undertaking at the workplace.

If the serious event results in the death of a worker or another person, WorkSafe ACT must be notified as soon after the event as is reasonably practicable but not later than 2 hours after the event and in writing no later than 48 hours after the event.,

For any other serious event WorkSafe ACT must be notified no later than 8 days after the day the serious event happened. The person in control must retain a copy of the notice for a period of at least five years after the date the notice is given.

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

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

Persons conducting a business or undertaking or persons in control 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.

Persons conducting a business or undertaking or persons in control are to provide training and information to their workers 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(s) is travelling, a description of the robber(s), and your name.

Injured and/or traumatised workers 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 workers until discussions have been held with the police. This is because different witnesses may remember different things and talking about it immediately afterwards may confuse the facts.

If necessary ensure a person holding a firearm licence secures the firearm of an injured or fatally injured guard.

### *Further action*

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

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

It is the responsibility of the persons conducting a business or undertaking or person in control to offer counselling to all workers after a violent incident has occurred.

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

Encourage workers 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 worker to make a decision about returning to work.

Persons conducting a business or undertaking, persons in control, 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.





Under the WS Act, a person conducting a business or undertaking or person in control must take all reasonably practicable steps to maintain appropriate information and records relating to the workers' 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 workers;
- plant maintenance logs; and
- incident reports.

## 10 PERSONAL PROTECTIVE AND SAFETY EQUIPMENT (PPSE)

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Persons conducting a business or undertaking or persons in control must take all reasonably practicable steps to ensure that each person at risk is supplied with any PPSE as required by the risk assessments. PPSE must be appropriate for the person and appropriate to the risk. Persons conducting a business or undertaking or persons in control must not charge workers for PPSE.

Equipment supplied to workers 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.



Persons conducting a business or undertaking or persons in control 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 soft skin 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.

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## 12 EQUIPMENT

## SELECTION OF VEHICLES AND

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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 designer's or manufacturer's requirements. Any defects to equipment must be reported immediately to the person in control of maintaining such equipment.





## 13 FEATURES

## NON-ARMoured VEHICLES - SAFETY

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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.

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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.

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.



*16.1 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 for the 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 person conducting a business or undertaking, 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 a person conducting a business or undertaking or person in control gives out work to more than one entity or person(s), an up-to-date consolidated list should be kept by the originating person conducting a business or undertaking or person in control 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 person conducting a business or undertaking must provide the same safe work systems as if that person(s) was a worker.

#### 16.3 MANUFACTURERS

Manufacturers have a work safety duty 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.

*17.1 MANUAL TASKS*

Manual tasks 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 task requirements as part of the general assessment process.

Under the National Standard for Manual Tasks the person conducting a business or undertaking or the person in control, as far as reasonably practicable, eliminate the risks or, if this is not reasonably practicable, minimise the risks of musculoskeletal disorders to workers performing manual tasks that may arise from either:

- the nature of the item designed; or
- the nature of the item manufactured or supplied by the person; or
- the manner in which it is supplied.

Under the WS Act, a person conducting a business or undertaking or person on control workplace must give appropriate information, instruction, training and supervision to a worker who carries out a manual task at the workplace on the following in relation to the manual tasks:

- safe methods of carrying out the task;
- use of safe systems of work;
- ways that the worker may eliminate or minimise the risk of musculoskeletal disorders

There are three steps to performing safe manual tasks. The National Standard for Manual Tasks provides a systematic approach to remove all the hazards involved in performing manual tasks. Persons conducting a business or undertaking or persons in control must involve workers and their WSRs in this process of consultation.

TO ASSIST WITH MANUAL HANDLING ASSESSMENTS SEE [ATTACHMENT 4 - MANUAL HANDLING CHECKLIST](#)

*17.2 FIRST AID*

Under the WS Act, persons conducting a business or undertaking or persons in control must take all reasonably practicable steps to ensure that they provide appropriate medical and first aid services for the workers.

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 First Aid in the Workplace Code of Practice. This Code prescribes the minimum contents of a first aid kit.

*17.3 AMENITIES*

The Act requires that persons conducting a business or undertaking or persons in control of workplaces provide and maintain adequate amenities for workers while they are at work.

To fulfil this duty, persons conducting a business or undertaking or 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;
- Work Safety Regulation 2009; and
- The Building Code of Australia (ACT Appendix).



In this Code of Practice:

**“Armoured vehicle operations”** means the transport of cash in purpose-designed vehicles that offer resistance to armed attack, which 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 a person conducting a business or undertaking or person in control 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.

**“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. .

**“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.

**“Worker”** means an individual who carries out work in relation to a business or undertaking, whether for reward or otherwise, under an arrangement with the person conducting the business or undertaking..

**“Employer”** means a person or entity who engages a worker to perform work 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 task”** means a task comprised wholly or partly by any activity requiring a person to use his or her musculoskeletal system in performing his or her work and can include the use of force for lifting, lowering, pushing, pulling, carrying or otherwise moving, holding or restraining any person, animal or item.

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

**“Person conducting a business or undertaking”** means a person or entity that is conducting a business or undertaking. This includes, but is not limited, to employers, self-employed persons, municipal corporations, sub-contractors and franchisors. A not-for-profit business or activity conducted by local, state or territory government may be a business or undertaking.

**“Person in control”** means anyone who has control of the premises, plant or equipment, a system of work, design, import or manufacture; including anyone with authority to make decisions about the management of any of the above. Examples include principal contractors, sub-contractors, employers and self-employed persons.

**“Personal protective and safety equipment (PPSE)”** 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, whether a person conducting the business or undertaking or person in control has taken reasonably practicable steps to eliminate or minimise a risk, the following will be taken into account:

- the seriousness of the risk;
- the availability and suitability of ways to eliminate or minimise the risk;
- what the duty holder knows or ought reasonably to know about the hazard giving rise to the risk, the risk itself, and, ways of eliminating or minimising the risk itself;and

- the cost of eliminating or minimising the risk (this includes burdens and disadvantages).

“Relevant regulatory material” includes:

- *Workers Compensation Act 1951*
- *Work Safety Act 2008*
- *Work Safety Regulation 2009*
- *Firearms Act 1996*
- *Public Health Act 1997*
- *Road Transport (General) Act 1999*
- *Road Transport (Safety and Traffic Management Act) 1999*

“Relevant codes of practice” include:

- National Standard for Manual Tasks; and
- First Aid in the Workplace Code of Practice.

“Risk” means exposure to the chance of injury or loss.

“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 a worker (whether or not he or she employs another person).

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

“Soft skin 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 a place where work is, has been, or is to be, carried out by or for someone conducting a business or undertaking.



## ATTACHMENT 1: WORK SAFETY CHECKLIST

The following example of a work 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 exhaustive and can be adapted to suit individual company needs.

Client Name: _____
Client Contract Description: _____
Business: _____
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. Work Safety Management Systems

- (a) Work safety management plan
- (b) Assigned responsibilities for workplace safety
- (c) Worker 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 workers
- (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 workers
- (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) Work safety representatives elected
- (f) Work 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) PPSE maintained
- (b) Workers provided with PPSE
- (c) Instruction in the use of PPSE
- (d) PPSE being worn by workers

### **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 workers

## **9. Amenities**

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

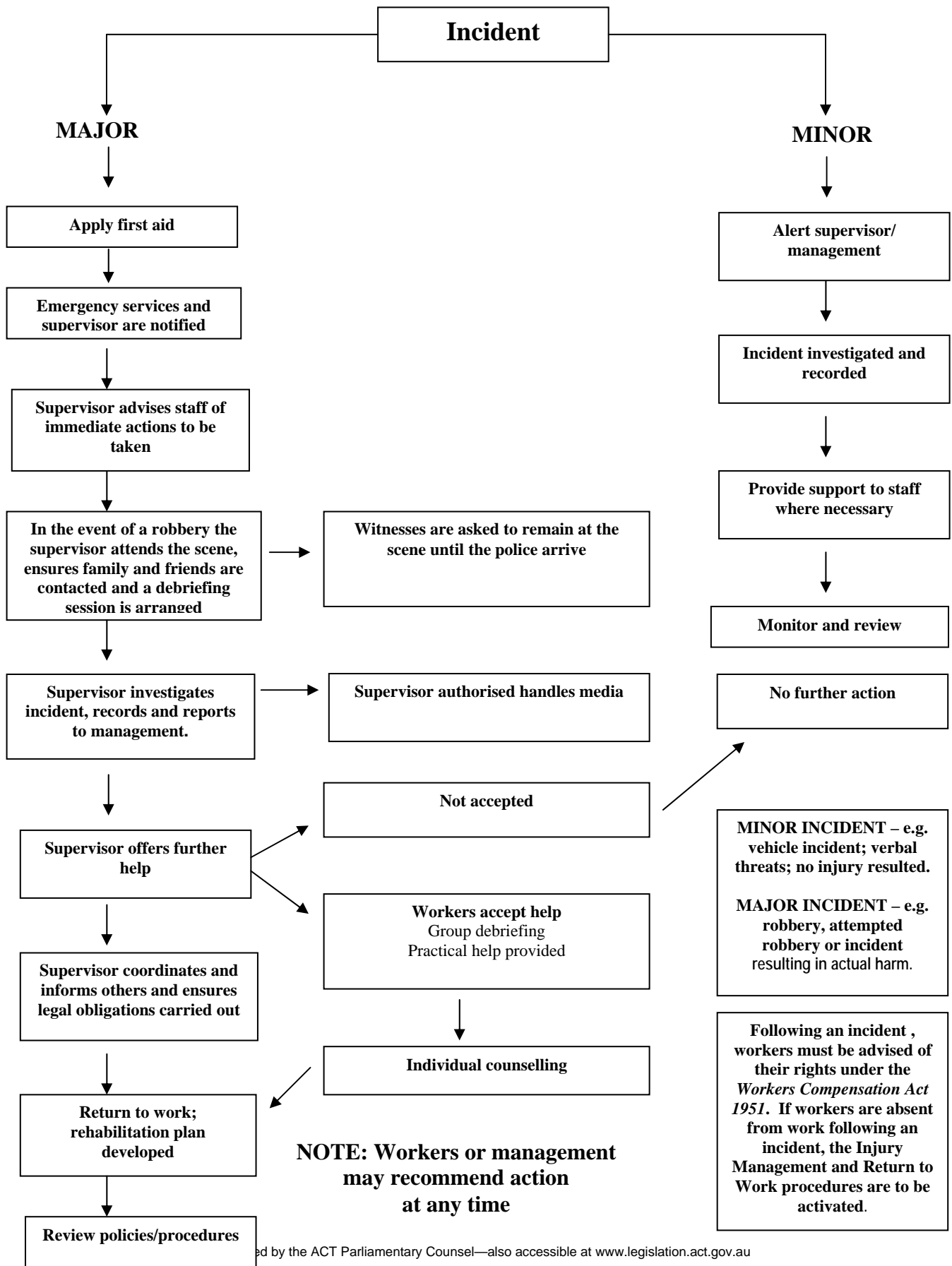


## ATTACHMENT 2: RISK ASSESSMENT REVIEW CHECKLIST

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





## ATTACHMENT 4: MANUAL TASKS CHECKLIST

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### MANUAL TASKS CHECKLIST



<p><b>Step 1 Overview</b></p>	<ul style="list-style-type: none"> <li>• Identify the risks by analysing workplace injury records. This can be done through direct observation or discussions with workers and their representatives.</li> </ul>
<p><b>Step 2 Assess Risks</b></p>	<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>
<p><b>Step 3 Eliminate or Reduce Risks</b></p>	<p><b>Job Redesign</b></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><b>Mechanical Handling Equipment</b></p> <ul style="list-style-type: none"> <li>• Provide mechanical handling equipment.</li> </ul> <p><b>Training</b></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><b>Other Administrative Controls</b></p> <ul style="list-style-type: none"> <li>• Provide any special needs.</li> <li>• Provide specific clothing.</li> </ul>