CASH IN TRANSIT

CODE OF PRACTICE 2002

WorkCover. Watching out for you.
Disclaimer

This publication contains information regarding occupational health, safety, injury management or workers compensation. It includes some of your obligations under the various Workers Compensation and Occupational Health and Safety legislation that WorkCover NSW administers. To ensure you comply with your legal obligations you must refer to the appropriate acts.

This publication may refer to WorkCover NSW administered legislation that has been amended or repealed. When reading this publication you should always refer to the latest laws. Information on the latest laws can be checked at www.nsw.gov.au or contact 02 9238 0950 or 1800 463 955 (NSW Country only).

© WorkCover NSW
## CONTENTS

Preface - What is an industry code of practice? .................................................. 3

1. Preliminary ............................................. 4
   1.1 Title .............................................. 4
   1.2 Purpose ......................................... 4
   1.3 Scope ............................................ 4
   1.4 Commencement .................................... 5
   1.5 Authority ......................................... 5
   1.6 Legal Obligations .................................. 5

2. Consultation at the workplace ................................................................. 6
   2.1 What is meant by consultation? ......................................................... 6
   2.2 Consulting about CIT operations ....................................................... 7
   2.3 Procedures for resolving health, safety and security matters ....................... 7

3. Managing risks in the CIT industry ......................................................... 8
   3.1 Identifying hazards ............................................. 9
   3.11 How to identify hazards ......................................................... 9
   3.2 Assessing the risks ............................................. 10
   3.21 Safety and security risk assessments ........................................... 10
   3.22 Prioritising the risks ............................................. 12
   3.3 Eliminating or controlling risks ................................................... 14
   3.31 Development of safe operating procedures ....................................... 15
   3.32 Selection of vehicles and other equipment ........................................ 16
   3.33 Safety features for non-armoured vehicles ....................................... 16
   3.34 Safety features for armoured vehicles ........................................... 17
   3.35 Allocation of appropriate resources .............................................. 17
   - Staffing levels (17)
   - Communication systems (17)
   - Personal protective equipment (17)
   3.36 Cash limits ............................................. 17
   3.37 Qualifications ............................................. 18
   - Pre-employment qualifications (18)
   - Site assessor qualifications (18)
   3.38 Training, supervision, information and instruction .................................. 18
   - Induction training (19)
   - On the job training (19)
   - Who should receive training (19)
   - Training topics (19)
   - Provision of information to employees and others (20)
   - Provision of information to safety and security risk assessors and others (20)
   - Supervision (20)

3.4 Monitor and review ............................................. 21
4. Incidents .........................................................22
4.1 What to do in the event of a robbery .........................22
4.2 Post hold-up procedures ........................................22
  • Critical incident response procedures (22)
  • Hazard and incident reporting and recording procedures (22)
  • Critical incident debriefing procedures (23)
  • Workers compensation and injury management programs (24)
  • Procedures for the review of safety and security risk assessments and control measures (24)
  • Provision of information and training (24)
5. Duties of other obligation bearers .............................25
5.1 Users of CIT services ...........................................25
5.2 Controllers of premises .........................................25
5.3 Responsible contracting .........................................26
5.4 Employees .......................................................26
6. Additional considerations for achieving safe workplaces .......28
6.1 Manual handling risk assessment ..............................28
  • Risk management process (28)
  • Elimination and control of manual handling risks (29)
  • Examples of controls (29)
6.2 First Aid .........................................................30
6.3 Amenities .......................................................30
7. Architects and designers ........................................31
8. Definitions .......................................................32

Appendix A – Sample risk management table .....................33
Preface

What is an industry code of practice?

An approved industry code of practice is a practical guide for employers and others, who have duties under Part 2 of the Occupational Health and Safety Act 2000, with respect to occupational health, safety and welfare to achieve the standard of safety required by the Occupational Health and Safety Act 2000 and OHS Regulation 2001 for a particular area of work.

This industry code of practice is approved by the Special Minister of State and comes into effect on 9th March 2003.

This approved industry code of practice:

• should be followed unless there is an alternative course of action, which achieves the same or better standard of health and safety in the workplace;
• is designed to be used in conjunction with the Occupational Health and Safety Act 2000 and the Occupational Health and Safety Regulation 2001;
• can be used to support prosecutions for failing to comply with or contravening the OHS Act 2000 or OHS Regulation 2001.

A WorkCover Authority Inspector can cite an approved industry code of practice in a direction or in an improvement or prohibition notice, indicating the measures that should be taken to remedy an alleged contravention or non-compliance. Failure to comply with a requirement in an improvement or prohibition notice is an offence.

The code provides a minimum standard which is expected to be achieved and does not exclude other better ways of achieving safe workplaces.
1. Preliminary

1.1 Title

This is the Code of Practice for the Transport and Delivery of Cash-in-Transit Industry.

This industry code of practice is approved by the Special Minister of State and comes into effect on 9th March 2003.

1.2 Purpose

This Code of Practice provides guidance to prevent injury and illness to persons engaged in Cash-in-Transit (CIT) operations or other persons for whose safety there are obligations under Part 2 of the OHS Act i.e. persons other than employees whilst they are at a workplace. It also provides practical guidance on implementing the requirements of the Occupational Health and Safety Act 2000 (OHS Act 2000) and the Occupational Health and Safety Regulation 2001 (OHS Regulation 2001). The OHS legislation is concerned with the safety of workers and others at workplaces (see sections 8, 9 and 10 OHS Act).

The objectives of this Code of Practice are to:

- promote the health, safety and welfare of people working in the CIT industry or other persons for whose safety there are obligations under Part 2 of the OHS Act i.e. persons other than employees whilst they are at a workplace.
- provide guidance on the standards of safety to be provided by those who provide CIT services or other persons having duties under Part 2 of the OHS Act.
- ensure that risks to health and safety in the CIT industry are identified, assessed and eliminated or controlled in accordance with the OHS Regulation 2001.
- promote consultation and co-operation between employers, employees, contractors, subcontractors, controllers of premises and users of CIT services in accordance with the OHS Act 2000.

1.3 Scope

This Code of Practice applies to all those persons associated with the CIT industry having duties under Part 2 of the OHS Act with respect to occupational, health, safety and welfare, including:

1) employers, employees, self-employed persons, contractors and subcontractors across NSW whose:
   a) work involves, includes or is in connection with the transportation of cash (as defined) by road by means of armoured or non-armoured vehicles or;
   b) business functions include:
      i) the transportation of cash by contract arrangement with or on behalf of other persons, businesses or entities, and/or
      ii) an escort service whereby cash (as defined) is safeguarded in the course of transportation, and/or
      iii) the provision of management, secretarial or administrative support of a Cash-in-Transit service or;
      iv) work is performed in relation to the servicing or maintenance of Automatic Teller Machines (ATM) or equivalent technology where cash is exposed;
2) users of CIT services
This Code of Practice does not apply to work performed where cash is collected and transported, in an incidental and ancillary way, as part of the function of distributing and delivering goods, those goods not being cash.

1.4 Commencement
9th March 2003.

1.5 Authority
This is an industry code of practice approved by the Special Minister of State under section 43 of the Occupational Health and Safety Act 2000.

1.6 Legal Obligations
This industry code of practice has been approved by the Special Minister of State under Section 43 of the OHS Act and comes into effect on 9th March 2003.

This Code is to provide practical guidance to employers and others who have duties under Part 2 of the OHS Act 2000 with respect to occupational, health and safety in the CIT industry. The Act imposes stringent obligations on employers and others, including self-employed persons and controllers of premises.

Other legislation that is relevant to the CIT industry includes:

- Security Industry Act 1997
- Firearms Act 1996
- Fair Trading Act 1992
- Road Transport (General) Act 1999
- Road Transport Safety and Traffic Management Act 1999
- Cash Transportation (non-armoured vehicles) Interim Award as varied or any award replacing or rescinding it
- Transport Industry - Armoured Cars &c. (state) Award as varied, or any award replacing or rescinding it
2. Consultation at the workplace

The OHS Act 2000 requires employers to consult with employees of the employer to enable the employees to contribute to the making of decisions affecting their health, safety and welfare at work.

The involvement of employees and/or other persons undertaking the CIT work in the risk management process is an essential step in achieving workplace health and safety. The information in this Code of Practice must be used when consulting with employees and/or other persons undertaking the CIT work about decisions that affect their health, safety and welfare.

2.1 What is meant by consultation?

Consultation involves sharing information with employees and/or other persons undertaking the CIT work, giving them the opportunity to express their views before decisions are made, valuing their views and taking them into account in the decision making process.

Consultation is based on recognition that employee input and participation improves decision-making about health and safety matters. Consultation with employees and others undertaking the tasks and/or their representatives will assist in the conduct of the risk assessment and development of safe operating procedures.

Employers must consult employees about what the consultation arrangements are going to be. The OHS Act 2000 provides three options for consultation arrangements:

a) an OHS committee comprising employer and employee representatives;
b) OHS representative(s) elected by employees;
c) other arrangements agreed by the employer and the employees.

Consultation must occur in the following circumstances:

a) when changes that may affect health, safety or welfare are proposed to the:
   • work premises,
   • systems or methods of work, or
   • plant or substances used for work;
b) when risks to health and safety arising from work are being identified and assessed;
c) when decisions are being made about the measures to be taken to eliminate or control those risks;
d) when introducing or altering the procedures for monitoring those risks;
e) when decisions are made about the adequacy of facilities for employee welfare;
f) when decisions are made about the procedures for consultation;
g) in any other case prescribed by regulation

Employers must also record the consultation arrangements and publicise them to all existing and new employees.

Readers should refer to the OHS Regulation 2001 and WorkCover’s Code of Practice: OHS Consultation for further details regarding employer obligations related to consultation.
2.2 Consulting about CIT operations

Employees must, at least, be consulted about:

a) safety and security risk assessments;
b) systems of work;
c) safe operating procedures and other risk control measures;
d) review of procedures, systems of work and risk assessments;
e) additional considerations detailed in Chapter 6 of this code.

2.3 Procedures for resolving health, safety and security matters

Under the OHS Regulation 2001, if a matter presenting a risk to health and safety cannot be resolved by the OHS Committee or OHS representative(s) or under other consultative arrangements agreed by the employer and employees:

a) the applicable OHS consultative arrangements are to be used and,
b) the matter must be formally referred to the employer;
c) the employer is to consider the matter and respond in a timely manner.
d) If the matter is not resolved the matter after the employer has been given a reasonable opportunity to consider and respond to the matter the OHS Committee or OHS representative(s) or the chairperson of the OHS committee may request an investigation of the matter by an Inspector.

This means that where employees and/or other persons undertaking the CIT work believe that the results of a safety and security risk assessment are inconsistent with the safe performance of work, or any other health and safety matters are in dispute, there must be consultation between employees and employers about the matter. This can include employee representatives such as OHS committee members, OHS representatives, officials of the relevant union and management of the employer.

Under the OHS Act 2000 an employer must not dismiss an employee, injure an employee in his or her employment or alter an employee’s position to his or her detriment because the employee:

• makes a complaint about a matter they consider to be a health and safety risk; or
• is a member of an OHS committee or an OHS representative; or
• exercises any of his or her functions conferred by the OHS Act 2000 as such a member or representative.
3. Managing risks in the CIT industry.

The OHS Regulation 2001 places obligations on employers to adopt a risk management approach to address workplace health and safety.

For risk management to be truly effective it must be integrated into the whole system of work. It cannot be simply hazard based, where hazards are identified and addressed in isolation or in an ad hoc manner.

The development and implementation of an Occupational Health and Safety Management System (OHSMS) will provide a framework to ensure the hazards and their associated risks are systematically managed. An OHSMS is simply a method of managing hazards and their associated risks through the development of a documented and co-coordinated plan. The effective management of risks will lead to a reduction in workplace incidents, injuries and illnesses and their associated costs.

Developing a risk management process within an OHSMS involves the following steps:

1. Developing an OHS policy, identifying responsibilities and making a commitment to achieving a safe and healthy workplace.
2. Planning to work safely.
3. Consulting employees and/or other persons undertaking the CIT work.
4. Developing procedures.
5. Informing and training employees and/or other persons undertaking the CIT work.
6. Monitoring and reviewing procedures and controls.

The OHS Regulation 2001 requires employers and controllers of premises to:

a) identify hazards, and
b) assess the risk of harm to the health or safety of any person arising from the hazard identified, and
c) eliminate or control those risks, and
d) review risk assessments and control measures.

If more than one person has responsibility for the risk management process or any other occupational health and safety matter, each person retains responsibility for the matter and the responsibility is to be discharged in a coordinated manner.

This Chapter outlines factors that should be taken into consideration by employers when identifying CIT hazards, assessing risks and eliminating or controlling those risks. The obligations of controllers of premises are covered in Chapter 5.

Chapter 6 provides detail on manual handling and other workplace health and safety risks.

The Risk Management Table in Appendix A provides examples of common CIT hazards, risks and control measures.
3.1 Identifying hazards

An employer must take reasonable care to identify any foreseeable hazard that may arise from the conduct of the employer's undertaking and that has the potential to harm the health and safety of:

a) any employee of the employer, or
b) any other person legally at the employer's place of work, or both.

The hazard identification process must be applied to the whole system of work.

3.1.1 How to identify hazards

The activities used to identify hazards should include but are not limited to the following:

a) consulting incident or injury records;
b) consulting employees and/or others who perform the CIT work;
c) conducting CIT site assessments;
d) conducting a survey of the route;
e) observing systems of work;
f) determining levels of training, experience and competence required to perform the tasks;
g) testing vehicles and equipment;
h) consulting with CIT clients, industry associations, government bodies and occupational health & safety consultants on likely hazards.

The hazards that may exist must be identified in all areas of operations. These areas of operation should include but are not limited to the following:

a) the tasks performed (eg. driving, pick-up and delivery, ATM work);
b) the locations involved (eg. client sites such as clubs & hotels, shopping centres, retail outlets, banks and ATMs, proximity of parking to site, in the office etc);
c) the varying roles (eg. driver, cash escort, cash carrier, guard);
d) the systems of communication (eg. back-to-base radio, mobile phones);
e) the method of transport (eg. vehicles, air, rail);
f) the time of day that the work is to be performed;
g) use of Personal Protective Equipment (eg. firearms) and any other equipment or technologies required;
h) work practices, systems of work, shift working arrangements and other fatigue and stress related hazards;
i) manual handling tasks*;
j) environmental factors (eg. outdoor and hot and cold environments, lighting, darkness, wet conditions, traffic and pedestrian flow, exposure to blood and other bodily fluids etc);
k) welfare provisions*.

*Chapter 6 provides detail on the risk management process for manual handling and requirements for welfare provisions.
3.2 Assessing the risks

The OHS Regulation requires an employer to assess the risk of harm to the health or safety of the following persons arising from any hazard identified in accordance with this Chapter:

a) any employee of the employer, or
b) any other person legally at the employer’s place of work, or both.

Once a hazard has been identified, an employer, contractor, controller or self-employed person must assess the risk the hazard poses to the health and safety of employees and/or others. That is, they must assess how likely it is that someone could be harmed by the hazard and how serious the resulting injury or illness could be. This must be done in consultation with employees and/or other persons undertaking the CIT work.

When conducting a risk assessment, employers need to take into consideration the diverse range of capabilities, experience and physical dimensions of persons in their workforce. This range has implications on the tasks undertaken and the design of control measures. All activities and tasks must be assessed and analysed to ensure that the outcome takes into account the widest possible range of the workforce to avoid increased exposure of a risk to a particular person or group. To this end, the employer must take into account the safety of each and every employee or other person at the employer’s place of work when conducting a risk assessment and determining controls. It is not sufficient to consider what is safe for an “average” person within the workforce.

Relevant information on risk assessments and control measures must be provided to employees and/or other persons performing the CIT work in a timely manner.

3.2.1 Safety and security risk assessments

A safety and security risk assessment must be conducted for each site and associated tasks prior to the performance of CIT work. Safety & security risk assessments for a particular site and associated tasks must be reviewed in accordance with the OHS Act and Regulation. Refer to Part 3.4 of this Code for further information. The assessment must have as its fundamental consideration the method by which the cash can be safely transported (e.g. armoured or non-armoured vehicle).

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 appropriate methods of elimination and/or control of risks and depending on the circumstances may not require a site visit.

All safety and security risk assessments must be conducted by a competent person in consultation with employees or other persons who are directly involved in undertaking the work (refer to Chapter 2). The assessment must also be conducted in consultation with CIT clients and/or a nominated representative.
The following must be taken into account when conducting a safety and security risk assessment:

a) the risk that any identified hazard can cause to an employee or other person in the workplace;
b) the likelihood of an injury or illness occurring;
c) the severity of any injury or illness that may occur;
d) any factors that might contribute to the risk;
e) any available health and safety information related to the hazard;
f) identification of the actions necessary to control the risk;
g) identification of any records that need to be kept to ensure the risk is eliminated or controlled.

Persons conducting site security risk assessments must determine and take into consideration at least the following specific factors:

- type of operation required (e.g., overt or covert – see requirements for overt/cover operations on page 17);
- type of transport and/or vehicles (e.g., armoured or non-armoured vehicles);
- whether the employees and/or other persons undertaking the CIT work should carry firearms (if the operation is to be covert);
- staffing levels required to safely perform the work;
- adequacy of communication systems (e.g., in radio reception ‘black spots’);
- proximity and availability of parking to the pick-up/delivery;
- suitability of Personal Protective Equipment for the tasks (including the provision of firearms);
- the amount, type or perceived value of the consignment collected or delivered;
- previous incidents or hold-ups that have occurred;
- environmental conditions (e.g., volume of traffic, lighting, darkness, wet conditions, presence of pedestrians and other people such as in shopping malls, access and egress).

Factors that must be taken into consideration when developing systems for the management of risks include, but are not limited to:

- the outcome of the site security risk assessment;
- the level of skill, experience and qualifications of the persons carrying out the CIT work;
- safe operating procedures;
- 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);
- frequency of service;
- information provided by customers and other relevant sources;
- condition and maintenance of vehicles and equipment;
- mix of types of work being performed (e.g., patrol and security services being performed with CIT work);
- factors contributing to fatigue and stress (e.g., hours of work, time of day, shift length, number of rest breaks, amount of time between breaks, potential or actual exposure to workplace violence).
3.2.2 Prioritising the risks

Once the risks have been assessed the next step is to prioritise the risk for remedial action.

A variety of methods may be used to assess the level of risk the hazard poses to the health and safety of employees and others. The four steps outlined below provide an example of how the level of risk can be determined:

Step 1: Estimate the consequences of an incident occurring;

Step 2: Estimate the likelihood of an incident occurring; and

Step 3: Combine the likelihood and consequence estimates to rate the risk.

Step 4: Prioritise the risks to be addressed first and determine the appropriate controls.

Step 1: Estimate the consequences of an incident occurring

Using Table A, realistically determine the worst outcome that could occur and consider the following:

- Extent of injuries or illness;
- Potential amount of lost time.

<table>
<thead>
<tr>
<th>CONSEQUENCE</th>
<th>INJURY/ILLNESS</th>
</tr>
</thead>
<tbody>
<tr>
<td>CATASTROPHIC</td>
<td>Fatality(s) or permanent serious disability(s) or permanent ill health</td>
</tr>
<tr>
<td>MAJOR</td>
<td>Serious injury, permanent part disability, long-term illness.</td>
</tr>
<tr>
<td>MODERATE</td>
<td>Medical treatment required and several days off work.</td>
</tr>
<tr>
<td>MINOR</td>
<td>First aid treatment required.</td>
</tr>
<tr>
<td>INSIGNIFICANT</td>
<td>No injuries.</td>
</tr>
</tbody>
</table>

Step 2: Estimate the likelihood of an incident occurring

Using Table B, determine the likelihood that an incident will occur/recur. Consider the following when making this decision:

- the number of times tasks are undertaken which could result in this, or a similar incident;
- the number of people performing these tasks or who are exposed to the hazard at the time; and
- the probability of the incident occurring/recurring while the task is being performed.

Injury and incident records, employees and others performing the work, local authorities, clients of CIT services and other CIT operators should be consulted when considering the likelihood of an occurrence/reoccurrence of an incident.

<table>
<thead>
<tr>
<th>LIKELIHOOD</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost certain</td>
<td>Is expected to occur in most circumstances - common repeat occurrence</td>
</tr>
<tr>
<td>Likely</td>
<td>Will probably occur in most circumstances - has been known to occur or, “it has happened before”</td>
</tr>
<tr>
<td>Possibly</td>
<td>Might occur at some time as, “I’ve heard of it happening”</td>
</tr>
<tr>
<td>Unlikely</td>
<td>Could occur but no known instances</td>
</tr>
<tr>
<td>Rare</td>
<td>May occur only in exceptional circumstances</td>
</tr>
</tbody>
</table>

TABLE A

<table>
<thead>
<tr>
<th>CONSEQUENCE</th>
<th>INJURY/ILLNESS</th>
</tr>
</thead>
<tbody>
<tr>
<td>CATASTROPHIC</td>
<td>Fatality(s) or permanent serious disability(s) or permanent ill health</td>
</tr>
<tr>
<td>MAJOR</td>
<td>Serious injury, permanent part disability, long-term illness.</td>
</tr>
<tr>
<td>MODERATE</td>
<td>Medical treatment required and several days off work.</td>
</tr>
<tr>
<td>MINOR</td>
<td>First aid treatment required.</td>
</tr>
<tr>
<td>INSIGNIFICANT</td>
<td>No injuries.</td>
</tr>
</tbody>
</table>

TABLE B
Step 3: Combine the likelihood and consequence estimates to rate the risk.

Join the consequence and likelihood classifications together on the Risk Table to identify the risk rank. For example, a 'Catastrophic' consequence together with an 'Almost Certain' likelihood gives a risk rank of 1, which is 'Extreme risk'.

<table>
<thead>
<tr>
<th>LIKELIHOOD</th>
<th>CATASTROPHIC</th>
<th>MAJOR</th>
<th>MODERATE</th>
<th>MINOR</th>
<th>INSIGNIFICANT</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALMOST CERTAIN</td>
<td>1 EXTREME RISK</td>
<td>1 EXTREME RISK</td>
<td>1 EXTREME RISK</td>
<td>2 HIGH RISK</td>
<td>2 HIGH RISK</td>
</tr>
<tr>
<td>LIKELY</td>
<td>1 EXTREME RISK</td>
<td>1 EXTREME RISK</td>
<td>2 HIGH RISK</td>
<td>3 MEDIUM RISK</td>
<td>3 MEDIUM RISK</td>
</tr>
<tr>
<td>POSSIBLY</td>
<td>1 EXTREME RISK</td>
<td>2 HIGH RISK</td>
<td>3 MEDIUM RISK</td>
<td>3 MEDIUM RISK</td>
<td>4 LOW RISK</td>
</tr>
<tr>
<td>UNLIKELY</td>
<td>2 EXTREME RISK</td>
<td>3 HIGH RISK</td>
<td>4 MEDIUM RISK</td>
<td>4 LOW RISK</td>
<td>4 LOW RISK</td>
</tr>
<tr>
<td>RARE</td>
<td>2 HIGH RISK</td>
<td>2 HIGH RISK</td>
<td>3 MEDIUM RISK</td>
<td>4 LOW RISK</td>
<td>4 LOW RISK</td>
</tr>
</tbody>
</table>

Legend:

- **Extreme risk**: Immediate action required - senior management involvement in decision making is imperative.
- **High risk**: Treat as urgent - senior management attention required.
- **Moderate risk**: Develop action plan - outline management responsibility.
- **Low risk**: Manage by routine procedures - monitor and review risks.

Step 4: Prioritise the risks to be addressed first and determine appropriate controls.

While all risks need to be controlled, risks that score 1 have the highest ranking and need to be addressed first. The following section outlines safety measures required to eliminate or control the risks.
3.3 Eliminating or controlling risks

Under the OHS Regulation 2001:

a) An employer must eliminate any reasonably foreseeable risk to the health and safety of:
   (i) any employee of the employer, or
   (ii) any other person legally at the employer’s place of work,
   or both, that arises from the conduct of the employer’s undertaking.

b) If it is not reasonably practicable to eliminate the risk, the employer must control the risk.

c) An employer must ensure that all measures (including procedures and equipment) that are adopted to eliminate or control risks to health and safety are properly used and maintained.

Meaning of control of risks

i. Under the OHS Regulation 2001, an obligation to control a risk to health or safety (in any case in which the elimination of the risk is not reasonably practicable) is an obligation to take the following measures (in the order specified) to minimise the risk to the lowest level reasonably practicable:
   1. firstly, substituting the hazard giving rise to the risk with a hazard that gives rise to a lesser risk,
   2. secondly, isolating the hazard from the person put at risk,
   3. thirdly, minimising the risk by engineering means,
   4. fourthly, minimising the risk by administrative means (for example, by adopting safe working practices or providing appropriate training, instruction or information),
   5. fifthly, using personal protective equipment.

ii. A combination of the above measures is required to be taken to minimise the risk to the lowest level reasonably practicable if no single measure is sufficient for that purpose.

iii. Any obligation in the Regulation to control a risk by taking specific risk control measures, or by taking specific risk control measures in a particular order, is in addition to the obligations referred to in (i) and (ii).

The measures taken to control the risks will be determined by the hazards identified and an assessment of the level of risk posed to health and safety. The control measures chosen must eliminate or adequately control exposure to the risk and not create a new hazard or risk.

Control measures should include but are not limited to:

- development of safe operating procedures;
- selection of appropriate vehicles;
- allocation of appropriate resources;
- staffing levels;
- communication systems;
- Personal Protective Equipment and other equipment or technologies;
- training; and
- supervision.
The following information provides detail on the specific risk control measures required for the CIT Industry.

3.3.1 Development of safe operating procedures

Safe operating procedures must be developed and documented and based on the safety and security risk assessment and identified control measures. These must be developed in consultation with employees and/or others conducting the CIT work and must set out who is accountable for each task. Accountability must be consistent with obligations under the OHS Act 2000 and OHS Regulation 2001.

Safe operating procedures must include but are not limited to:

- clearly defined and communicated roles and duties of each employee performing the CIT operation (eg. whether their role is as a driver, cash escort, cash carrier or guard);
- pre-departure checklists;
- appropriate and regular testing of all safety features such as communication devices and duress alarms;
- regular inspections and maintenance of the vehicles and personal protective equipment and other equipment used;
- procedures to maintain confidentiality such as description of sites by code rather than name;
- variation in delivery/pick up times and routes, where possible;
- systems for communication with base, including provision for daily welfare checks;
- procedures for site servicing, supplemented by the Risk Assessment, including arrival, on site and departure procedures;
- procedures to defer the 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 vehicle collision and/or vehicle or equipment breakdown;
- adherence to determined cash limits;
- hold-up and post hold-up procedures. These would include emergency procedures to apply in the event of a robbery, assault, or other incident, including procedures for the appropriate medical treatment of injured persons (refer to Chapter 4 of this Code);
- hazard and incident reporting procedures;
- manual handling procedures;
- measures to address fatigue and stress;
- systems for regular monitoring and review of all systems and procedures.

3.3.2 Selection of appropriate vehicles

Vehicles must be selected in accordance with the safety and security risk assessment and must:

- conform to Australian Design Rules (as appropriate);
- be mechanically sound;
- be serviced and maintained regularly and adequately to ensure continued user safety.

Repairs, alterations and maintenance must be carried out by a competent person in accordance with the requirements of the designer or manufacturer. Any defects to equipment must be reported immediately to the person responsible for maintaining such equipment.
3.3.3 **Safety features for non-armoured (soft-skin') vehicles**

Non-armoured soft-skin vehicles, commonly known in the CIT industry as ‘soft skins’, used for covert operations must be unmarked and the employee and/or other persons conducting the covert operation must be in plain clothes and may or may not be armed (depending on the outcomes of the risk assessment).

Non-armoured vehicles used for overt operations must carry company signage and employees and/or other persons conducting the operation must be uniformed and armed. Company signage must be permanent and predominant non-magnetic signage.

Non-armoured vehicles used for CIT operations must include at least the following safety features:

- drop safe, secure container or other like method of ensuring the cash is secure (NB. the boot of a vehicle is not considered to be a safe method of securing the cash unless it can be accessed from within the vehicle);
- back-to-base radio with override button for use in an emergency, if applicable;
- alternative communication method effective in radio reception ‘black spots’;
- hands-free mobile telephone;
- duress alarm with back-to-base alert;
- remotely activated central locking;
- engine immobiliser designed to prevent unauthorised ignition of the vehicle.

Consideration should be given to the installation and use of a Global Positioning System or other vehicle tracking system.

3.3.4 **Safety features for armoured vehicles**

Armoured vehicles used for CIT operations must be purpose designed for the transportation of cash and must include at least the following safety features:

- ballistic rated protection from armed attack
- back-to-base radio with override button for use in an emergency, if applicable;
- alternative communication method effective in radio reception ‘black spots’;
- hands-free mobile telephone;
- duress alarm with back-to-base alert;
- remotely activated central locking or alternative method of preventing unauthorised entry into the vehicle.

Company livery may be overtly displayed on the armoured vehicles or be covertly disguised without any overtly displayed company livery.

Employees conducting the CIT operation must be armed, and in the case of overt operations, uniformed.

Consideration should be given to the installation and use of a Global Positioning System or other vehicle tracking system.
3.3.5 Allocation of appropriate resources

Staffing levels

The minimum number of persons used to conduct CIT operations must be determined in accordance with the safety and security risk assessment.

Communication systems

CIT operators must provide appropriate communication systems to ensure the safe conduct of the CIT work. These include but are not limited to back-to-base equipment, personal duress alarms and arrangements for emergency communication.

Communication failures and radio reception ‘black spots’ are hazards that increase the risk to workers and must be addressed during the risk assessment process.

Personal Protective Equipment (PPE)

Under the OHS Regulation 2001 employers must supply each person at risk with any PPE required by the safety and security risk assessments. PPE must be appropriate for the person and control the risk for that person. Employers must not charge employees for PPE or anything else that is required by the OHS Act 2000 or OHS Regulation 2001.

Personal protective equipment and any other equipment provided to employees and/or other persons conducting the CIT work must be selected in accordance with the safety and security risk assessment and must:

a) conform to Australian Design Rules and/or Australian Standards (where applicable)
b) be mechanically sound (where applicable);
c) be serviced and maintained regularly and adequately to ensure continued user safety.
d) in the case of firearms, be supplied in a holster that complies with the Firearms Act 1996 and its Regulations in the case of overt operations, or as required by a safety and security risk assessment in the case of a covert operation.

Equipment supplied to employees and/or other persons conducting CIT work should include firearms in a holster that complies with the Firearms Act 1996 and its Regulations in the case of overt operations, or as required by a safety and security risk assessment in the case of a covert operation.

In addition to the above PPE, employees conducting CIT work should wear non-slip footwear.

3.3.6 Cash Limits

Cash limits for each CIT operation are to be determined in accordance with the safety and security risk assessment.
3.3.7 Qualifications

Pre-employment qualifications

All persons performing CIT work must hold appropriate qualifications in accordance with the Security Industry Act 1997 and must comply with all licensing and other requirements under this Act and its Regulations, the Firearms Act 1996 and any other relevant legislation.

Site assessor qualifications

Persons conducting site safety and security risk assessments for CIT operators must be a competent person and meet all the qualification and/or other requirements of the Security Industry Act 1997 and its associated Regulations.

Competent safety and security site risk assessors may hold, for example, a Class 2A Licence and/or qualifications in Security Risk Management and should also possess relevant CIT industry experience.

3.3.8 Training, supervision, information and instruction

The OHS Act 2000 requires employers to provide training, instruction, information and supervision to ensure the health and safety at work of their employees.

Induction training

Under the OHS Regulation 2001 employers must ensure that each new employee receives induction training that covers the following:

a) arrangements at the place of work for the management of occupational health and safety, including arrangements to report hazards to management,

b) health and safety procedures at the place of work relevant to the employee, including the use and maintenance of risk control measures,

c) how employees can access any health and safety information that the employer is required by the Regulation to make available to employees,

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

On the job training

CIT work must not be performed unless those performing the work have relevant on the job experience and received appropriate and adequate training, instruction and information.

Employees and/or other persons undertaking CIT work must only be engaged for duties consistent with their qualifications and training and their performance must be continually monitored to ensure that they carry out their duties in a lawful and competent manner.
A person who is gaining experience to provide any CIT service (covert or overt) 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 perform the service to a competent person.

The employer must review and monitor the systems of work and control measures and must provide refresher training to ensure those systems and safe operating procedures are being followed, including the use of appropriate PPE.

Who should be receiving training?

The target groups for training at a workplace include:

- managers and supervisors of employees and/or other persons undertaking the CIT work considered at risk of injury or work-related illness from robbery and/or who have responsibility for implementing safe operating procedures;
- workplace health and safety committees and employee representative(s);
- staff responsible for the purchasing of plant, PPE and for designing, scheduling and organisation of work activities
- safety and security risk assessors.

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.

Training topics

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

a) the statutory responsibilities of employers and employees;
b) the nature and extent of hazards identified in relation to the work performed;
c) hazard and incident reporting systems which include but are not limited to the arrangements for reporting:
   - defects in plant or equipment used for CIT work;
   - any other hazards which may present a risk to health and safety (e.g. manual handling);
   - hold-ups, attempted robbery, vehicle collision or other type of incident.
d) safe operating policies, procedures and other measures adopted to minimise the risk, or effects of robbery, other incidents, injury or illness. This must include, but is not limited to, instruction on:
   - departure, arrival and on-site and procedures;
   - staffing levels;
   - communication systems;
   - cash limits;
   - the use and operation of vehicles and their safety features, plant and associated equipment;
   - when and how to use PPE including the correct use of firearms and selection, fitting, proper care and maintenance of PPE;
   - confidentiality;
   - how to access health and safety information;
   - procedures to be adopted in the event of a hold-up or other emergency, vehicle collision or breakdown and/or other type of incident;
d) the effects of robbery on affected employees and/or other persons undertaking the CIT work.

Further guidance material on inducting and training employees is available from WorkCover NSW.
Provision of information to employees and others

The OHS Regulation 2001 requires employers to ensure that any person who may be exposed to a risk to health or safety at the employer’s place of work

a) is informed of the risk, and
b) is provided with any information, instruction and training necessary to ensure the person’s health and safety.

This means that employers must immediately supply affected employees and their representatives and/or other persons undertaking the CIT work with:

• the results of any applicable safety and security risk assessment;
• information on safe operating procedures;
• review of such a risk assessment and/or safe operating procedure;
• any other relevant OHS information.

Employees and/or other persons undertaking the CIT work must have, on request, access to such assessments and safe operating procedures at the CIT operator’s base at all times, including access from the vehicle driven by the employee and/or other persons undertaking the CIT work.

Employers must brief each employee as to the contents of the safety and security risk assessment applying to a site and safe operating procedures when each employee and/or other person first begins to perform work in relation to that site and at regular intervals thereafter.

Provision of information to safety and security risk assessors and others

The OHS Regulation 2001 requires employers to provide persons who have responsibilities with respect to the following under the Regulation with all available information necessary to enable them to fulfil those responsibilities:

• identifying hazards,
• assessing risks arising from those hazards
• eliminating or controlling risks,
• monitoring or reviewing risk control measures,
• providing information.

Supervision

The OHS Regulation 2001 states:

1. The Employer must ensure that the employer’s employees are provided with reasonable supervision necessary to ensure the health and safety of the employees and any other persons at the employer’s place of work.
2. The employer must ensure that supervision is undertaken by a competent person.
3. In determining the nature and extent of necessary supervision, the employer must have regard to the competence, experience and age of each employee.
Employers must provide supervision necessary to ensure the health and safety of employees and/or others at work.

Supervision must:

a) ensure that employees and/or others performing CIT work hold appropriate qualifications and licences;
b) ensure that those employees and others have acquired the knowledge and skills required to perform the CIT work through approved competency training, qualifications and experience;
c) ensure that adequate occupational health and safety management systems are in place and operating to ensure that the safe work practices that have been adopted are adhered to. This must include the use of PPE;
d) include refresher training on procedures.

A person who is gaining experience to provide any CIT service (covert or overt) 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 perform the service to a competent person.

3.4 Monitor and review

The OHS Regulation 2001 states that employers must review risk assessments undertaken and any measures adopted to control risks, whenever:

a) there is evidence that the risk assessment is no longer valid,
b) an injury or illness results from exposure to a hazard to which the risk assessment relates, or
c) a significant change is planned to the place of work, work practices, or work procedures.

Management of safety and security 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 and security risk assessments undertaken and control measures implemented on a regular basis.

When safety and security risk assessments and risk control measures are being reviewed the process of identification, assessment and determination of control measures must be repeated. Employees and/or other persons undertaking the CIT work who are potentially affected by the change must be consulted during the risk management process and informed of new requirements at completion.
4. Incidents

The personal safety of employees and others involved in, or witnessing, a robbery or attempted robbery is paramount. CIT operators must have incident response procedures in place. These procedures must be developed in consultation with employees and/or other persons undertaking the CIT work and must be in compliance with industry training requirements and competency standards.

4.1 What to do in the event of a robbery

Employers must have procedures in place for maintaining the safety of employees and others during an incident and provide training on those procedures. These procedures must provide clear and appropriate guidance to employees and others on the actions that are to be taken during an incident.

4.2 Post hold-up procedures

Employers must have post hold-up procedures in place. These should include:

a) critical incident response procedures;

b) hazard and incident reporting and recording procedures;

c) critical incident debriefing procedures;

d) workers compensation claims and injury management programs;

e) procedures for the review of safety and security risk assessment(s) and control measures;

f) provision of information and training.

4.2.1 Critical incident response procedures

Following a robbery, attempted robbery or other critical incident it is important to have procedures in place to ensure that injured and traumatised persons are treated quickly and appropriately, the Police and CIT operator are contacted and actions are taken to minimise the impact of the event. If such procedures are not already in place, readers may wish to refer to the samples in WorkCover’s Workplace Violence in the Finance Sector document.

4.2.2 Hazard and incident reporting and recording procedures

CIT operators have responsibilities to have systems in place to enable CIT workers and others to report workplace hazards and incidents such as a robbery, attempted robbery or faulty equipment and for those hazards and incidents to be recorded. These must be developed and implemented in consultation with employees and/or other persons undertaking the CIT work.

Details to be recorded about the incident include where it happened, why it occurred, who was involved and the course of action to be taken to prevent the reoccurrence of the incident.

Hazards and OHS safety problems should be reported as soon as they are noticed so that the risks can be assessed and addressed as quickly as possible. Records of reported hazards must be kept and should include details of the action taken to remove the hazard or control the risk arising from the hazard.
CIT operators have obligations to notify WorkCover about certain incidents or injuries. A robbery or attempted robbery may be an occurrence that must be notified under the OHS Act 2000 and Regulation 2001. Other workplace matters to be reported to WorkCover include:

- an injury, illness or incidence of violence that results in the person being off work for 7 days or more;
- the death of a person arising from a work related incident or occurrence;
- exposure to bodily fluids that present a risk of transmission of a blood-borne disease such as a syringe filled with blood;
- an uncontrolled explosion, fire, escape of dangerous goods or damage to plant that impedes safe operation;
- any other occurrence that presents a serious risk of injury or illness to a person reportable under the OHS Act 2000 and Regulation 2001.

Notice to WorkCover must be given in writing as soon as possible, but no later than 7 days after the employer becomes aware of the situation. Incident report forms may be obtained from a WorkCover office. Employers 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.

The OHS Act also requires that where an incident or illness results in the death of a person at work, the scene must not be disturbed for a period of 36 hours (or a shorter period if authorised by WorkCover). This time period allows WorkCover, the Police and other relevant organisations to inspect the site and gather information.

Under the Workplace Injury Management and Workers Compensation Act 1998 employers are required to keep a register of injuries. Employees must notify the employer of the injury as soon as possible after the injury has occurred. Notification may be given orally or in writing and must state the name and address of the injured person, the cause of the injury and the date that it occurred.

c) Critical incident debriefing procedures

Critical incident stress often results from events that occur outside a person’s usual everyday experiences. These events can overwhelm normal coping skills and cause strong emotional and physical reactions to the incident, either at the time of the incident or some time later. These reactions interfere with a person’s ability to function on a day-to-day basis and in some cases can be quite debilitating for an extended period of time.

Following a robbery, attempted robbery or other violent incident, CIT workers may need to be debriefed by professional staff as soon as possible. The aim of debriefing is to minimise the effects of the incident and to maximise the person’s return to normal functioning within the shortest possible time. However, follow up counselling may also be necessary.

The prompt provision of support, debriefing and counselling is very important. If this does not occur the impact of the incident can have long-term and adverse effects on employees and others in the workplace such as Acute Stress Disorder or Post Traumatic Stress Disorder.

The provision of critical incident stress management training will assist employees and others to understand the reactions they may have to critical incidents. Qualified professionals should conduct this training (preferably those qualified in debriefing and counselling for critical incidents).

Employers may also consider the establishment of a formal peer support group within the organisation, as a method of assisting employees who are the victims of a robbery or attempted robbery.
d) Workers compensation claims and injury management programs

The workers compensation system provides financial benefits and other assistance to workers if they sustain an injury arising out of or in the course of employment. Injury management encompasses all the activities associated with ensuring the early return of an injured worker to the workplace. These activities include treatment, rehabilitation, retraining, claims management and employment management practices.

Every insurer is obliged to develop an injury management program for their insured employers. This program ensures that the insurer and employer have injury management systems in place before an injury or illness occurs. An individual injury management plan is developed for every worker who has a significant injury or illness and this plan ensures the worker receives prompt, appropriate medical management and a planned and managed return to work.

Employees must be informed of their rights and obligations in relation to workers compensation and injury management.

e) Procedures for the review of safety and security risk assessment(s) and control measures.

As outlined previously the safety and security risk assessment and any measures adopted to control risks must be reviewed after the occurrence of a robbery or attempted robbery. The occurrence of such an incident is an indicator of a further risk to employees and/or other persons undertaking the CIT work and as such must be identified, assessed and controlled in consultation with employees and/or others conducting the CIT work. It is critical to analyse the incident and incorporate new information into the safe operating procedures to prevent a reoccurrence of the incident.

f) Provision of information and training

Training on procedures to be adopted in the event of a robbery, attempted robbery, other violent incident or emergency must be provided prior to an employee conducting the CIT work. This is to ensure that all employees and/or other persons undertaking the CIT work know what actions to take during and after an incident to minimise the risks to their personal safety. Refresher training on such procedures is recommended every 12 months or after the occurrence of a robbery, attempted robbery or other critical incident.
5. Duties of other obligation bearers

5.1 Users of CIT services

Users of CIT services, if also persons having obligations under part 2 of the OHS Act 2000, must:

- enable the CIT operators, employees and/or other persons to perform the CIT work in a safe manner and in accordance with the requirements of this Code of Practice.
- make CIT operators aware of their previous security history and the occurrence of any relevant incidents.
- provide appropriate information, instruction and training to their employees in relation to the risk of robbery, including emergency procedures.

5.2 Controllers of premises

The OHS Act 2000 places a duty on controllers of work premises to ensure that premises used by people as a place of work are safe and without risks to health.

The OHS Regulation 2001 requires controllers of workplace premises to:

a) identify any hazards arising from the premises that have the potential to harm the health or safety of anyone accessing, using or egressing from the premises;
b) assess risks of harm to the health and safety of any person arising from the hazard identified;
c) eliminate or control any risk arising from the premises to the health and safety of any person accessing, using or egressing from the premises;
d) review risk assessments and control measures;
e) provide information necessary to other persons who have responsibilities under the OHS Regulation 2001 to enable them to fulfill their responsibilities.

Controllers of premises include but are not limited to Local Government Authorities, shopping centre owners and/or managers, financial institutions, retail shop owners and/or managers.

As stated in Chapter 3 of this Code of Practice, if more than one person has responsibility for an OHS matter, each person retains responsibility for the matter and the responsibility is to be discharged in a coordinated manner.

Cooperation between controllers of premises and CIT operators and/or any other parties with OHS responsibilities is fundamental to the achievement of a safe work environment for employees and/or other persons performing the CIT work.

Controllers of premises have a responsibility to reduce the level of risk posed to employees and other persons undertaking the CIT work.

When conducting approval and planning processes, Local Councils should consider the risks and hazards experienced by operators of armoured and non-armoured vehicles when performing CIT work (e.g. this may include whether appropriate parking spaces are available in close proximity to sites being serviced by CIT operators).
Reducing the risk of robbery can be achieved by organising the premises so that:

- the transfer of cash can be achieved safely;
- safe access and egress is offered to persons involved in CIT operations;
- security devices such as cameras are located in prominent areas;
- strong exterior and interior non-glare lighting is used in and around the premises;
- Automatic Teller Machines (ATMs) are positioned in low risk areas;
- entrances to foyers, lobbies and car parks are easily observed by pedestrians and motorists.

5.3 Responsible contracting

If a CIT operator (principal contractor) gives CIT work out to another employer, entity person or persons who will carry out any or all of the work (sub-contractor) the principal contractor should ensure that:

- all of the provisions of this Code of Practice are met;
- the employer, entity or person is carrying out the work in a safe manner.

This can be achieved through the provision of an occupational health and safety management plan to the sub-contractor that includes:

a) a statement of responsibilities listing the names, positions and responsibilities of all persons who will have specific responsibilities for occupational health and safety, and
b) details of the arrangements for ensuring compliance with OHS legislative requirements, and
c) details for the arrangements for managing OHS incidents.

The subcontractor should provide a safe work method statement that:

a) describes how the work is to be carried out;
b) identifies the work activities assessed as having safety risks;
c) identifies the safety risks;
d) describes the control measures that will be applied to the work activities;
e) includes a description of the equipment used in the work, the standards or codes to be complied with, the qualifications of the personnel doing the work and the training required to do the work.

The provision of a safety and security risk assessment to the principal contractor may be sufficient if it details the information required above.

When giving out CIT work the principal contractor should make a written record of the:

- name and address of the employer, entity or person to whom the work is given;
- date of giving out the work and date for completion or cessation of the contract;
- 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.

Where a principal contractor gives out work to more than one sub-contractor the principal contractor should keep an up to date consolidated list of those employers, entries or persons that contains all of the information required to be kept by this Code of Practice.
5.4 Employees

Employees must take reasonable care of the health and safety of themselves and others. Employees must cooperate with employers in their efforts to comply with occupational health and safety requirements. This means that employees must notify their employer of safety and security hazards, risks and incidents in line with the employer’s OHS policy and procedures.

All persons must not:

- interfere with or misuse things provided for the health, safety or welfare of persons at work
- obstruct attempts to give aid or attempts to prevent a serious risk to the health and safety of a person at work
- refuse a reasonable request to assist in giving aid or preventing a risk to health and safety
- disrupt a workplace by creating health or safety fears.

Employers must not require employees to pay for anything done or provided to meet specific requirements made under the Act or Regulation.
6. Additional considerations for achieving safe workplaces

6.1 Manual Handling Risk Assessment

The OHS Regulation 2001 places a duty on employers to ensure that:

a) all objects are, where appropriate and as far as reasonably practicable, designed, constructed and maintained so as to eliminate risks arising from the manual handling of objects; and
b) work practices used in the place of work are designed so as to eliminate risks arising from manual handling; and
c) the working environment is designed to be, as far as reasonably practicable and to the extent that it is within the employer’s control, consistent with the safe handling of objects.

If it is not reasonably practicable to eliminate a risk arising from manual handling, an employer must design the work activity involving the manual handling to control the risk and if necessary must:

a) modify the design of the objects to be handled or the work environment, and
b) provide mechanical aids, or make arrangements for team lifting or both, and
c) ensure that persons carrying out the activity are trained in manual handling techniques, correct use of mechanical aids and team lifting procedures appropriate to the activity.

An employer must, as far as reasonably practicable, achieve risk control by means other than team lifting.

Manual handling refers to 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.

Injuries and illnesses resulting from manual handling include back injuries such as sprains and strains, injuries to the shoulders and arms, cardiovascular strain, hernias, cuts and fractures.

Risk management process

Employers must:

a) identify the manual handling hazards and risks in consultation with employees and/or other persons undertaking the task;
b) conduct manual handling risk assessments in consultation with employees and/or other persons undertaking the task;
c) eliminate or control risks by identifying short and long term solutions;
d) evaluate and review the control measures and risk assessments.
The OHS Regulation 2001 requires that an employer, in carrying out a risk assessment in relation to manual handling, must take into consideration (where relevant) the following factors:

a) actions and movements (eg. carriage of coin);

b) workplace layout;

c) working posture and position;

d) duration and frequency of manual handling;

e) location of loads and distances moved;

f) weights and forces;

g) characteristics of loads and distances moved;

h) work organisation;

i) work environment;

j) skills and experience;

k) age;

l) clothing;

m) special needs (temporary or permanent);

n) any other health and safety factors considered relevant by the employer, the employees or their representatives and/or other persons undertaking the CIT work.

Elimination and control of manual handling risks

The measures take to control the manual handling risks will be determined by the hazards identified and an assessment of the level of risk posed to health and safety. No single option will necessarily reduce a risk. A combination of different control options is often needed to address risk factors and reduce the overall risk of manual handling injuries. These should be determined in accordance with the hierarchy of controls outlined in Step 4 of 3.22 in Chapter 3 of this Code of Practice. The control measures chosen must eliminate or adequately control exposure to the risk and not create a new hazard.

Examples of controls

Job redesign:

• Modify the object
  The object being handled may be modified or repackaged into a smaller weight or a different size or shape (eg. coins/cash may be bundled into smaller bags).

• Modify workplace layout
  The layout of plant, equipment and furniture may be modified or rearranged (eg. positioning of drop safes etc)

• Rearrange material flows
  The schedule or timing and path(s) of material flows may be modified. (eg. the risks may be reduced by reducing the distance over which the coin is carried).

• Different actions, movement and forces
  With or without workplace modifications, a task may be done in a different way, using different actions, movements and forces.
- **Modify the task – mechanical assistance**
  The risk associated with a task can be reduced by mechanical assistance, minor rearrangements of plant and equipment and an effective maintenance program.

- **Modify task – team lifting**
  The actions, movements and forces required for manual handling can be modified by team lifting arrangements (eg. have two persons lift the object).

**Mechanical handling equipment**

The provision of mechanical handling equipment with the provision of appropriate training can reduce the risk by reducing the force required (eg. use of trolleys).

**Training**

Where the previous options have been unable to reduce a significant risk, then the person requires particular instruction, training and/or education in the manual handling task.

**Other considerations**

Other considerations include any special needs relating to the employee and/or other person undertaking the work, such as their health and clothing.

### 6.2 First Aid

Under the OHS Regulation 2001 employers must provide at each place of work:

- first aid facilities that are adequate for the immediate treatment of injuries and illnesses that may arise at the place of work, and
- if more than 25 persons are employed at a place of work, trained first aid personnel

Procedures for the appropriate medical treatment of injured persons, administration of first aid and contents of first aid kits must be determined in accordance with the safety and security risk assessments and detailed in the safe operating procedures manual. The OHS Regulation 2001 prescribes minimum contents of first aid kits.

### 6.3 Amenities

The OHS Regulation 2001 requires employers to ensure that appropriate amenities are available for employees while they are at work.

Readers may refer to the Code of Practice: Workplace Amenities, which is available from WorkCover NSW.
7. Architects and designers

This section of the Code applies to those parties responsible for the design of buildings and workplaces and is provided for information in the interest of achieving enhanced safety in the Cash-in-Transit industry.

The NSW Government has developed a whole of government approach to the prevention of crime that forms part of the National Crime Prevention strategy. This approach includes ways in which councils, architects and others can design safer environments. One such example is the Crime prevention through environmental design strategy, an approach that applies crime prevention strategies to the planning and design stages of buildings and public spaces. Further information on this strategy is detailed in the Crime prevention resource manual, which can be obtained from the NSW Attorney General’s Department.

When designing or modifying buildings, architects and designers must take into account the need to minimise the risk of robbery. Architects and designers should also collaborate with CIT industry representatives to reduce the risk of robbery.

Reducing the risk of robbery can be achieved by designing the building so that:

- the transfer of cash can be achieved safely;
- safe access and egress is offered to persons involved in CIT operations;
- security devices such as cameras are located in prominent areas;
- strong exterior and interior non-glare lighting is used in and around the building;
- Automatic Teller Machines (ATM’s) are positioned in low risk areas;
- entrances to foyers, lobbies and car parks are easily observed by pedestrians and motorists.
8. Definitions

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

Competent person – shall mean a person who has acquired through training, qualification or experience, or a combination of them, the knowledge and skills to carry out the task.

Controller of premises – shall mean a person who has control of premises used by people as a place of work, including a person who has:

a) only limited control of the premises, and
b) under any contract or lease, an obligation to maintain or repair the premises.

Employer – shall mean a person who employs persons under contracts of employment or apprenticeship and includes self-employed persons.

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

Trained first aid personnel means:

a) a person who holds a current first aid certificate issued after successful completion of a WorkCover approved occupational first aid course; or
b) a current occupational first aid certificate issued after successful completion of a WorkCover approved occupational first aid course; or
c) a level 3 or greater NSW ambulance officer; or
d) a registered nurse; or
e) a medical practitioner.
Appendix A – Sample Risk Management Table

The following table provides some examples of hazards and risks in CIT operations and possible methods of controlling those risks. The table serves as a guide only, is not a substitute for a risk assessment and does not include all potential hazards and controls.

<table>
<thead>
<tr>
<th>Activity (task)</th>
<th>What can harm you (hazards)</th>
<th>What can happen (risks)</th>
<th>Likelihood/Severity</th>
<th>Examples of Controls</th>
</tr>
</thead>
</table>
| Entering or exiting vehicle / bank / office / building etc with cash | • Robbers  
• Other vehicles  
• Slips, trips or falls | • Robbery  
• Attempts at robbery  
• Getting shot  
• Psychological injury  
• Getting injured from slipping over | • Safe operating procedures developed and implemented eg. communication, identifying and reporting suspicious behaviour, checklists, what to do in an emergency etc  
• Appropriate staffing levels  
• Clear access and egress  
• Policy to employ experienced workers  
• Provision and maintenance of appropriate PPE  
• Provision of appropriate training  
• Provision of adequate competent supervision  
• Distance between vehicle and building is as short as possible  
• Vehicle fitted with drop safe / communication devices / alarm etc  
• Welfare checks |
| Driving                                  | • Other vehicles  
• Robbers  
• Fatigue & stress  
• Working environment (volume of traffic, presence of others such as in shopping complexes, wet conditions, darkness)  
• Hot environment | • Vehicle collision  
• Robbery  
• Attempts at robbery  
• Getting shot  
• Psychological injury  
• Vehicle breakdown  
• Heat stress | • Route planned and varied in consultation with CIT workers, clients, incident records etc  
• Alternative route planned  
• Safe operating procedures developed and implemented eg. what to do if suspicious behaviour such as being tailed is identified; what to do in the event of a vehicle collision / breakdown / robbery / attempted robbery / other emergency  
• CIT workers trained in safe operating and emergency procedures  
• Covert operation (if appropriate)  
• Variation of vehicles used (if operation is covert)  
• Route kept confidential  
• Regular and thorough maintenance of vehicles  
• Driving records checked  
• Rostering practices and shift work arrangements allow for adequate number of breaks and sufficient rest periods between shifts  
• Air conditioned vehicle |
<table>
<thead>
<tr>
<th>Activity (task)</th>
<th>What can harm you (hazards)</th>
<th>What can happen (effects)</th>
<th>Likelihood/Severity</th>
<th>Examples of Controls</th>
</tr>
</thead>
</table>
| Maintenance of ATM | • Robbers  
• Working environment (lighting, location of ATM) | • Robbery / attempted robbery  
• Getting shot  
• Psychological injury | | • Safe operating procedures for  
• surveillance  
• robbery / attempted robbery  
• minimisation of cash exposure time  
• Staffing levels appropriate for level of risk  
• Provision of training on procedures  
• Appropriate levels of competent supervision |
| Carrying coins / putting coins in drop safe | • Manual handling | • Strains, sprains; injuries such as back damage | | • Change work practices  
• Training in manual handling techniques  
• Limits on bag weights |
| Handling firearms | • Firearm  
• Bullets | • Injury from unintentional discharge | | • Training on maintenance and use of firearms  
• Appropriate licences |