

Draft - Transport and delivery of cash and valuable goods

Code of practice

Editorial note

When reading this Code of practice (this Code), please be aware that any reference to:

- the 'Work Health and Safety Act' refers to the Work Health and Safety Act 2011 (NSW), or any successor legislation,
- the 'Work Health and Safety Regulation' refers to the Work Health and Safety Regulation 2017 (NSW), or any successor regulation,
- a code of practice refers to the relevant NSW Code of practice, or any successor code of practice.

This Code may contain references to relevant withdrawn or superseded Australian Standards or Australian/New Zealand Standards.

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Acknowledgment

Safe Work NSW wishes to acknowledge the contribution and collaboration of industry and social partners through the public comment period and technical development of this Code.

Additionally, the cooperation of other WHS regulators and Safe Work Australia is acknowledged for aligning materials where appropriate, particularly from ACT and Queensland codes of practice.

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Foreword

This Code of practice (this Code) on how to manage work health and safety risks of transport and delivery of cash and valuable goods is an approved code of practice under section 274 of the *Work Health and Safety Act 2011* (the WHS Act).

An approved code of practice provides practical guidance on how to achieve the standards of work health and safety required under the WHS Act and the *Work Health and Safety Regulation* (the WHS Regulation) and effective ways to identify and manage risks.

A code of practice can assist anyone who has a duty of care in the circumstances described in the code of practice. Following an approved code of practice will assist the duty holder to achieve compliance with the health and safety duties in the WHS Act and WHS Regulation, in relation to the subject matter of the code of practice. Like regulations, codes of practice deal with particular issues and may not cover all relevant hazards or risks. The health and safety duties require duty holders to consider all risks associated with work, not only those for which regulations and codes of practice exist.

Codes of practice are admissible in court proceedings under the WHS Act and WHS Regulation. Courts may regard a code of practice as evidence of what is known about a hazard, risk, risk assessment or risk control and may rely on the code in determining what is reasonably practicable in the circumstances to which the code of practice relates. For further information see Safe Work Australia's *Interpretive Guideline: The meaning of 'reasonably practicable'*.

Compliance with the WHS Act and WHS Regulation may be achieved by following another method if it provides an equivalent or higher standard of work health and safety than the code.

An inspector may refer to an approved code of practice when issuing an improvement or prohibition notice.

Scope and application

This Code is intended to be read by a person conducting a business or undertaking (PCBU). It provides practical guidance to PCBUs on how to manage risks to health and safety associated with the transport and delivery of cash and valuable goods. Other approved codes of practice should be referenced for guidance on managing the risk of specific hazards.

This Code may be a useful reference for other persons interested in the duties under the WHS Act and WHS Regulation.

This Code applies to all types of work and all workplaces covered by the WHS Act involved in the transport and delivery of cash and valuable goods, this includes banking, retail, armoured transportation services, couriers and logistics companies.

This Code does not apply to the handling of cash and valuable goods in the workplace, i.e. after the transport and delivery transaction is complete.

How to use this Code of Practice

This Code includes various references to the legal requirements under the WHS Act and WHS Regulation. These references are included for convenience only and should not be relied on in the place of the full text of the WHS Act or WHS Regulation. The words 'must', 'requires' or 'mandatory' indicate a legal requirement exists that must be complied with.

The word 'should' is used in this Code to indicate a recommended course of action, while 'may' is used to indicate an optional course of action.

1 Introduction

1.1 What is the transport and delivery of cash and valuable goods?

Transport and delivery of cash and valuable goods involve the secure movement of money, jewellery, precious metals, and other high-value items (e.g. art) from one location to another by any transport means. This includes services provided by banks, retail businesses, armoured transportation companies, logistics and couriers.

1.2 Who has health and safety duties?

There are a number of duty holders who have a role in managing the risks of transport and delivery of cash and valuable goods, including those listed below.

A person can have more than one duty, and more than one person can have the same duty at the same time.

The main duty holders and key legislative provisions have been referenced in the table below, however the list is not exhaustive.

Duty holder	Application
Person conducting a business or undertaking (PCBU) WHS Act sections 19, 46 and 47	<p>A PCBU must eliminate risks to health and safety in the transport and delivery of cash and valuable goods, or if that is not reasonably practicable, minimise the risks so far as is reasonably practicable.</p> <p>This includes:</p> <ul style="list-style-type: none">• the provision and maintenance of safe plant and structures,• the safe use, handling, and storage of plant, structures and substances,• the provision of information, training, instruction and supervision,• monitoring the health and conditions of the workplace to prevent illness and injury,• the provision of adequate facilities for the welfare at work of workers in carrying out work,• managing psychosocial hazards. <p>PCBUs also have duties to</p> <ul style="list-style-type: none">• consult workers about work health and safety,• consult, cooperate and coordinate with other duty holders,• ensure that the health and safety of other people is not put at risk from work carried out as part of the conduct of the business or undertaking.
Officers WHS Act section 27	<p>Officers of the PCBU must exercise due diligence to ensure the PCBU complies with the WHS Act and WHS Regulation. This includes maintaining up to date WHS knowledge and taking reasonable steps to ensure the business or undertaking has and uses appropriate resources and processes to eliminate or minimise risks to health and safety from the transport and delivery of cash and valuable goods.</p>

	Further information on who is an officer and their duties is available in Safe Work Australia's <i>Interpretive Guideline: The health and safety duty of an officer</i> .
Workers WHS Act section 28	<p>While at work, workers must:</p> <ul style="list-style-type: none"> • take reasonable care for their own health and safety, • take reasonable care that their actions or omissions do not adversely affect the health and safety of other persons, • comply with any reasonable instructions given by the PCBU, as far as they are reasonably able, • cooperate with any reasonable health and safety policies or procedures of the PCBU. <p>If personal protective equipment (PPE) is provided by the PCBU, the worker must, so far as they are reasonably able, use or wear it in accordance with the information, instruction and training provided.</p>
Designers, manufacturers, importers, installers and suppliers of plant, substances or structures WHS Act sections 22-26	<p>Must ensure, so far as is reasonably practicable, the plant or substances they design, manufacture, import, supply or install is without risks to health and safety including carrying out testing and analysis and providing information about the risks posed to users of the plant or substances.</p>
Other persons at the workplace WHS Act section 29	<p>A person at a workplace must:</p> <ul style="list-style-type: none"> • take reasonable care for their own health and safety, • take reasonable care that their acts or omissions do not adversely affect other people's health and safety, • comply, so far as they are reasonably able, with reasonable instructions given by the PCBU to allow the PCBU to comply with the WHS Act.

1.3 Consultation

Duty / Provisions	Application
<p>Consulting workers</p> <p>WHS Act Section 47 - 49</p>	<ul style="list-style-type: none"> • PCBU's have a duty to consult with workers, so far as reasonably practicable, on WHS matters which affect them. • Consultation is a two-way process with workers to identify WHS issues, share information, give workers a reasonable opportunity to express views and take those views into account before making decisions about health and safety matters. • While consultation may not always result in agreement, agreement should be the objective as it will make it more likely the decisions are effective and actively supported. • Workers should be encouraged to report hazards and health and safety problems immediately so the risks can be managed before an incident occurs. • If workers are represented by a health and safety representative (HSR), the consultation must involve that representative. • Workers must be advised of consultation outcomes in a timely manner. • PCBU's must have effective mechanisms to consult with workers, including when: <ul style="list-style-type: none"> — identifying hazards and assessing risks, — making decisions about ways to eliminate or control risks, — changing or updating workplace facilities, — proposing changes that may affect the health and safety of workers, — making decisions about consultation procedures, resolving safety issues, monitoring workers' health and conditions, and providing information and training, — selecting new equipment, — introducing new tasks, changing existing tasks or carrying out work in new environments.
<p>Consulting, cooperating and coordinating activities with other duty holders</p> <p>WHS Act section 46</p>	<ul style="list-style-type: none"> • PCBU's must, as far as reasonably practicable, consult, cooperate and coordinate activities with all other persons who have a WHS duty. • Duty holders should exchange information about who is doing what to ensure effective coordination of works and management of risks, this includes: <ul style="list-style-type: none"> — the PCBU engages workers to carry out work, — the PCBU directs or influences workers in carrying out work, — other persons may be put at risk from work carried out in their business or undertaking, — the PCBU manages or controls a workplace or the fixtures, fittings or plant at a workplace,

- the PCBU's business or undertaking involves designing, manufacturing, importing or supplying plant, substances or structures for use at a workplace,
- the PCBU's business or undertaking involves installing, constructing or commissioning plant or structures at a workplace.

Further guidance on consultation requirements is available in the *Code of practice: Work health and safety consultation, cooperation and coordination*.

1.4 Information, training, instruction, and supervision

Duty / Provisions	Application
Information, training, instruction or supervision WHS Act section 19 WHS Regulation clause 39	<ul style="list-style-type: none"> • PCBU's must provide any information, training, instruction, and supervision necessary to protect all persons from health and safety risks in the transport and delivery of cash and valuable goods. • The information, training and instruction: <ul style="list-style-type: none"> – must be suitable and adequate for the nature of works, risks and control measures implemented, – must be readily understandable to the person it is being provided to, so far as is reasonably practicable, – should be supported by relevant safe work procedures, i.e. emergency procedures, traffic rules, PPE. • Workers need to be trained and have the appropriate skills to carry out tasks safely. • Training needs to be provided to workers by a competent person. • Training programs should be practical and 'hands on' and take into account the particular needs of workers.

Note: Security guards that carry firearms must be licenced in accordance with the relevant legislation, e.g. the *Firearms Act 1996*. PCBU's should have policies in place in relation to ensuring security guards have a current H pistol licence and storage and handling is as per the legislative requirements.

2 Risk management process

WHS Regulation clause 34 - 38

Risk management is a systematic process to eliminate or minimise the potential for harm to people.



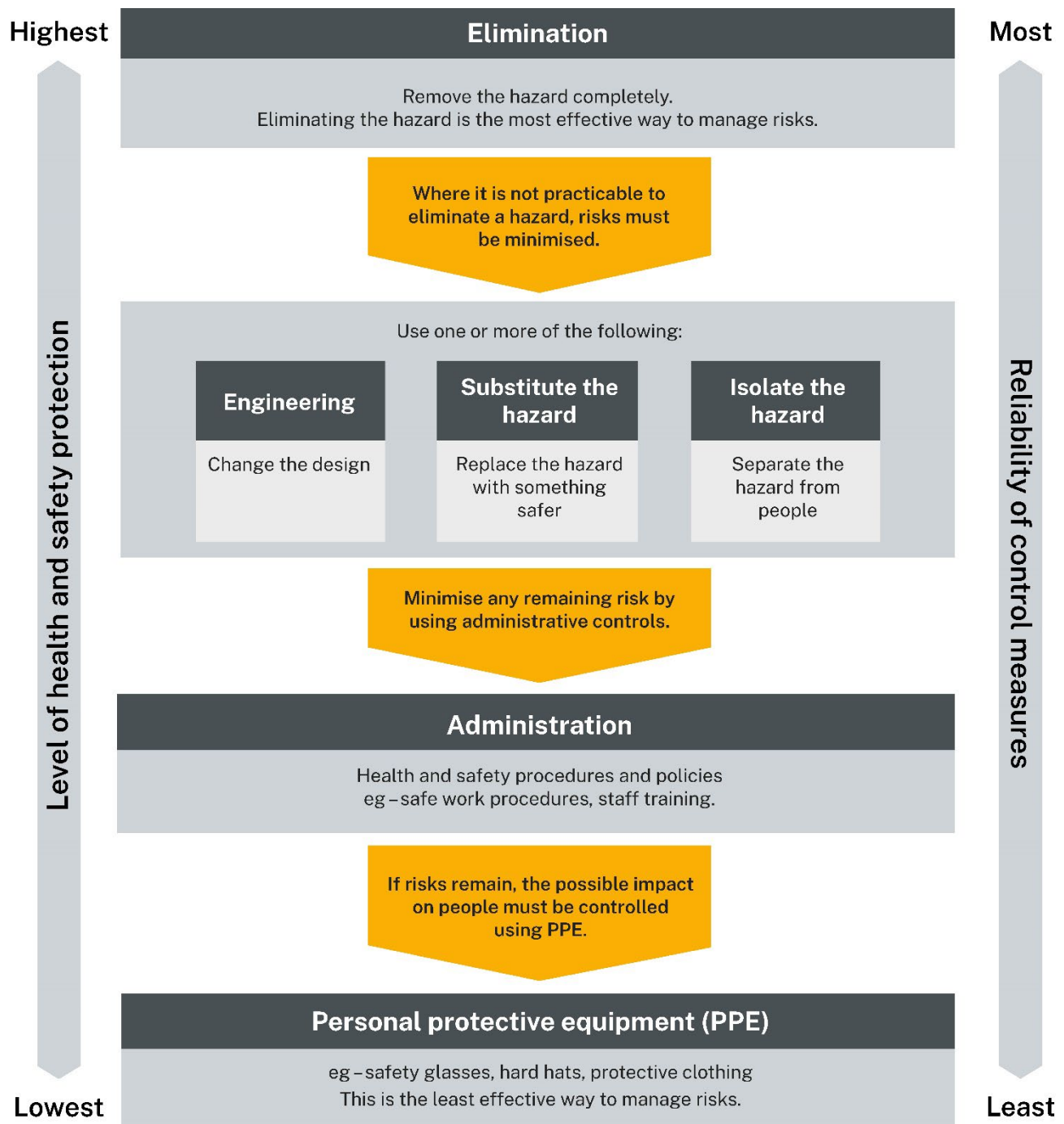


Figure 1: An overview of the hierarchy of control

Further risk management guidance is available in the:

- *Code of practice: How to manage work health and safety risks*
- *Code of practice: Managing psychosocial hazards at work*
- *Code of practice: Sexual and gender-based harassment*

3 Common risks associated with transport and delivery of cash and valuable goods

PCBUs must eliminate or minimise risks associated with the transport and delivery of cash and valuable goods.

Common risks involved with the transport and delivery of cash and valuable goods include:

- armed robbery,
- vehicle hijacking,
- physical assaults on security personnel,
- traffic accidents involving transport vehicles,
- equipment malfunction or failure,
- inadequate security measures at pickup and delivery locations,
- fatigue and stress among personnel due to long hours and high-risk environment,
- inadequate information security,
- unsecured transfer of cash and valuables between locations,
- alterations to standard routes of travel, i.e. from roadworks, traffic control,
- handling of ammunition and potential exposure to lead contamination,
- carrying significant amounts of cash or valuables,
- thermal exposure, i.e. working in the heat.

Additional information about hazards and control measures may be obtained from:

- security equipment manufacturers and suppliers,
- armoured vehicle maintenance technicians or specialists,
- security personnel and transport drivers,
- law enforcement agencies and security consultants,
- industry associations for security and transport,
- financial institutions and retail businesses with similar operations,
- training programs and certifications from recognised security training organisations,
- risk assessments and reports from insurance companies specialising in high-value asset protection.

The potential impacts of risks involved with the transport and delivery of cash and valuable goods include:

- physical injuries from incidents such as robbery attempts, vehicle hijackings,
- psychological harm from high-stress situations which may result in long term psychological injuries,
- heat exhaustion or dehydration, i.e. from extended time in hot conditions, enclosed spaces within armoured vehicles,
- temporary or permanent hearing loss from exposure to loud alarms or gunfire.

4 Planning and preparation to manage risks

Careful planning and preparation assists in ensuring that work is done safely and risks are minimised so far as is reasonably practicable. Planning and preparation must involve consultation with suitably competent and qualified personnel as well as workers and other PCBUs.

This chapter provides guidance to assist with planning for the transport and delivery of cash and valuable goods to ensure the safety of both workers and the public.

4.1 Planning by the designer

Buildings

When designing buildings, designers must ensure, so far as is reasonably practicable, that the structure is designed to be without risks to the health and safety of persons including considering the risk of armed robbery.

To minimise risks, building designs should take into consideration:

- safe access and egress to workers involved in the transport and delivery of cash and valuable goods,
- dedicated vehicle parking,
- vehicle loading docks,
- fit for purpose exterior and interior lighting,
- open glass fronts to allow clear visibility,
- automatic teller machines (ATMs) housed in safe areas to reduce risks,
- public safety in the vicinity of cash and valuable goods operations,
- appropriate location of security devices, such as closed-circuit television (CCTV) and surveillance technology, in highly visible areas.

For further information refer to the *Code of practice: Safe design of structures*.

4.2 Plant / vehicles

When designing plant / vehicles that will be used for the transport and delivery of cash and valuable goods, key considerations should include:

- Security features including:
 - armour to protect against potential attacks, such as bullet-resistant glass, reinforced steel, and secure compartments.
 - advanced locking mechanisms,
 - fit for purpose surveillance systems including cameras and Global Positioning System (GPS),
- Plant/vehicle types including:
 - van or large truck to be able to effectively manage the volume and type of valuables,
 - engine capacity and reliability for load management and additional weight of security features,
 - fit for purpose communication systems.

Armouring of vehicle should be to a minimum G2 specification (Australian/New Zealand Standard AS/NZS2343:1997 *Bullet-resistant panels and elements*) or equivalent.

Non-armoured vehicles – safety features

Non-armoured (soft skin) vehicles should include at least the following security features as minimum safety requirements:

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

Vehicles used for covert work should not bear markings that distinguish them as such.

4.3 Planning by the client

The client should consider controls to minimise risks when deciding on the location of secure storage for cash / other valuable goods (i.e. ATMs, safes, vaults), as well as the method by which collections or deliveries will be made on their premises. Clients should consult with the operator with the view to introducing appropriate control measures and strategies to minimise risks, including:

- identifying the most secure access and egress routes to and from the premises and secure storage locations,
 - identifying vehicle parking and pedestrian access with safety and security paramount,
 - installing or positioning of other security features (e.g. CCTV, security personnel, alarms),
 - ensuring there is adequate and fit for purpose lighting near secure storage locations and throughout access/egress routes,
 - installing appropriate duress alarm devices in or near secure storage locations,
 - positioning ATMs for public use in safe and secure areas wherever possible.
-

4.4 Planning by the PCBU

The PCBU should consider the following when planning for the work to be done safely:

- an assessment of the risks involved in carrying out the work,
- the availability and suitability of ways to eliminate or minimise risks,
- providing standard operating procedures (SOPs), where appropriate, which describe how the work is to be done safely. The SOPs should take into account an assessment of the risk involved in carrying out the work,
- implementing a system to review the SOPs, i.e. following an incident, site changes, hazard report, safety observations, feedback,
- providing suitable and safe access to and from the collection points,
- providing appropriate induction, training and instruction to all persons carrying out the work,
- consideration of the level of experience of persons when allocating specific tasks to minimise the risks,
- an assessment of hazardous manual tasks which could cause back strain and other injuries and providing systems of work which comply with the *Code of practice: Hazardous manual tasks*, such as the weight of cash and valuable goods to be manually handled and the method of storage/stacking to reduce the amount of handling,
- provision of general and/or specialised PPE,
- managing thermal comfort, i.e. air-conditioned vehicles, ventilation, scheduling demanding work in the coolest part of the day, providing hydration supplies to minimise stops, split shifts and providing adequate breaks,

- selection of fit for purpose hard skin and soft skin vehicles,
- ongoing maintenance and inspection of equipment provided, i.e. vehicles, PPE, communication devices,
- how the transfer of valuables can be achieved without exposure to the public such as when crossing the footpath,
- the scheduling of transport routes to avoid times and locations when there is an increased risk of an incident,
- higher level controls for areas identified as high risk, such as when transporting goods from a hard skin vehicle to a destination across footpaths, roads, etc.,
- the use of advanced surveillance and communication systems to monitor transport activities in real-time,
- consulting with local police in relation to traffic control and potential routes to be taken during high risk deliveries,
- training requirements, including refresher training, e.g. defensive driving, emergency response, situational awareness.

Planning needs to involve consultation with workers or their representatives and other duty WHS holders. Consultation and consideration needs to occur about how the work is to be done safely to minimise the risks so far as reasonably practicable. Consultation is an important risk management strategy.

5 Controlling the risks

Workers may be exposed to numerous hazards and risks such as unarmed and armed robbery, confrontation with weapons, physical assault, vehicle accidents, and other hazardous conditions. The PCBU must assess the risk and after assessing the risks, PCBU must take action to eliminate or control the risks, so far as reasonably practicable.

A PCBU must ensure that all necessary steps are taken to maintain a safe work environment. This includes ongoing monitoring, review, and adaptation of safety measures to address changing circumstances and emerging risks.

This chapter provides guidance on the measures that may be implemented to eliminate or minimise risks.

5.1 Standard operating procedures (SOPs)

SOPs based on risk assessment should be developed and readily accessible to all workers. They must be developed in consultation with workers, HSRs and/or workers of the affected workgroup.

SOPs should include:

- clearly defined and communicated roles and duties of each worker performing the operation (e.g. whether their role is as a driver, cash escort, cash carrier or guard),
- pre-departure checklists, appropriate and regular testing of the functionality of all safety features such as communication devices, duress alarms, firearms and vehicles,
- procedures that ensure the security and confidentiality of information relative to sites and operations:
 - using codes rather than easily identifiable names,
 - varied delivery / pick up times and routes, where possible, to reduce risk of predictability,
 - conduct welfare checks as part of normal operational requirements or report to the radio control room as required,
- identification of radio reception 'black spots' and the implementation of suitable alternative means of communication, e.g. satellite phone,
- managing risks when transferring collections from multiple collection points to a single courier bank vehicle for deposit at a secure location,
- specific procedures to be followed at each site,
- 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 should take into consideration information supplied by the client,
- 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),
- emergency procedures to apply in the event of a robbery, assault, hijacking, or other incident, including procedures for the appropriate medical treatment of injured persons,
- procedures for the relief or replacement of a worker during the transport of cash or valuable goods due to unexpected circumstances,

- procedures for reporting faulty equipment, hazards and incidents, i.e. robbery, vehicle collisions, threats, including notification to SafeWork NSW where required,
 - manual handling procedures, e.g. for lifting and carrying coins,
 - conducting ongoing dynamic risk assessments during the course of work by applying situational awareness practices,
 - measures to address fatigue and psychosocial harm,
 - ongoing evaluation of safe operating procedures using data from hazard and incident reports or safety alerts.
-

5.2 Selection of equipment to manage risks

PCBUs must:

- select and provide appropriate vehicles and equipment for the work tasks being undertaken,
- manage and control the risks associated with the use of vehicles and equipment.

Risk controls include:

- communication devices, e.g. back to base alarms, duress alarms, GEO satellite tracking,
- ensuring vehicles and equipment are serviced and maintained regularly and adequately to ensure continued user safety.

Short and long arms must be stored as per the safe storage requirements of the *Firearms Act 1996 (NSW)* and *Firearms Regulation 2017 (NSW)*.

Additionally pistols must be safely secured in a suitably designed retainment holster for both overt and covert operations which secures the pistol in the holster.

5.3 Communication systems

Appropriate communication systems must be provided to ensure effective communication for workers. These can include:

- back-to-base equipment,
- personal duress alarms and
- emergency communication arrangements
- phones for use in areas with unreliable mobile reception

Communication failures and radio reception 'black spots' can increase the risk to workers and must be managed.

5.4 Providing shift briefings

Shift briefings should be provided at the commencement of shifts. They provide an opportunity for consultation with workers to discuss issues, share information and give workers a reasonable opportunity to share their views. The briefings should include:

- supervisor on duty,
- duties for the day,
- risks associated with the transportation of goods, including any current risks identified by police or others,
- emergency response procedures,
- equipment visual check,

- vehicle visual check (see Appendix C Pre-start vehicle checklist),
 - changes or updates to SOPs,
 - rest breaks.
-

5.5 Staffing levels

The PCBU should allocate appropriate staffing levels to ensure effective and safe operations when transporting and delivering cash and valuable goods.

The staffing levels used in operations must be determined in accordance with the risk management processes. Consideration needs to be given to ensuring an adequate number of workers to safely manage the workload and fatigue.

5.6 Use of covert operations to manage risk

Covert operation is broadly defined as the use of undercover operations which conceals the identity of workers, the process, and the goods from potential offenders' intent on robbery.

Covert operations may be a necessary risk control where a risk assessment has identified a high risk operation, i.e. a high risk of robbery because of the perceived value of the operation or the perception the operation is a soft target.

The risk assessment should be conducted by a person who has knowledge and competence in the field of covert operations in consultation with a HSR or workers from the affected workgroup.

The risk assessment should identify the specific areas of risk and determine how covert operations potentially reduce or eliminate risk to health and safety of workers involved in the operation. This includes:

- identifying the risks to health and safety – Who or what presents a risk of robbery or other offences to the workers?,
- determining the methods that will be applied to the operation, i.e. covert vehicles, discreet communication equipment, covert surveillance and appearance,
- determining the level of operational security and precautions to be applied, i.e. if the covert operation is high risk of robbery or violence, the operation must have a level of secrecy to remain undetected by potential offenders,
- ensuring training and instruction is provided to all workers participating in the covert operation in the use and application of covert security techniques,
- ensuring supervision is in place during the covert operation,
- ensuring emergency response procedures are in place,
- ensuring all covert vehicles and equipment is inspected and fit for purpose for use in the covert operation,
- ensuring any firearms to be utilised in the covert operation are concealed and secured to prevent unauthorised access.

PCBUs should develop and implement an operational plan which ensures all critical operational issues such as logistical support and communications are implemented during covert operations.

5.7 Personal Protective Equipment (PPE)

PPE requirements should be determined through the risk management process.

PPE should be selected:

- to minimise risk to health and safety, including by ensuring that the equipment is suitable for the nature of the work and any hazard associated with the work and is of suitable size and fit and reasonably comfortable for the worker who is to use or wear it,
- maintained, repaired and replaced so that it continues to minimise risk to the worker who uses it, including by ensuring that the equipment is clean and hygienic, and in good working order.

Workers need to be provided with information, training and instruction in the proper use and wearing of PPE, and the storage and maintenance of PPE.

Examples of relevant PPE:

- back-to-base communication equipment,
- personal duress alarms,
- non-slip footwear reliable for operational purposes,
- weight bearing vests for appointments and equipment (i.e. radios, first aid),
- wet weather gear,
- high-visibility vests,
- bulletproof vests,
- gloves and eyewear.

6 Other considerations

6.1 First aid

As per clause 42 of the WHS Regulation, PCBUs must provide access to adequate first aid equipment, trained first aiders and facilities for the administration of first aid.

For further information and an example of a first aid assessment template refer to the *Code of Practice: First aid in the workplace*.

When developing first aid procedures, consideration also needs to be given to the relevant risk assessment.

Workers should be advised of matters including:

- location of work site to inform any emergency services,
- availability of first aid facilities and services,
- infection control procedures.

Examples of content of first aid kits are available in the *Code of Practice: First aid in the workplace*.

Consideration should also be given to including trauma management supplies such as trauma pads or abdominal dressings for controlling heavy bleeding, tourniquet, haemostatic bandages, chest seals, occlusive dressings, compressed gauze rolls.

First aid kits should be regularly inspected and maintained to ensure used items are replaced and that items that are damaged or expired are removed and new stock put in place.

Vehicles should be equipped with a first aid kit which meets the specific work requirements as determined using a first aid assessment process. The kit should be readily accessible and stored in a clearly marked and secure location within the vehicle.

6.2 Fatigue management

Workers suffering from fatigue can be at an increased health and safety risk due to increased error rates, lapses in concentration, reduced cognitive ability, etc.

A PCBU must assess the health and safety risks of fatigue and implement appropriate controls. These can include:

- scheduling adequate rest breaks,
- modification to the design of work, such as the physical and mental work demands, the work intensity, etc,
- modification of environmental factors that contribute to fatigue, such as ensuring a comfortable thermal work environment,
- administrative controls, such as developing work practices to reduce fatigue in the workplace.

There may be situations where workers are unable to return to a base for a break. Policies and procedures should be developed, based on risk assessments, to manage risks associated with taking breaks while armed. Consideration should be given to circumstances such as workers not being permitted to enter some premises while armed and the safe handling of firearms in line with legislative and licensing requirements.

Further guidance is available in Safe Work Australia's *Guide for managing the risk of fatigue at work*.

6.3 Amenities

Access to amenities or facilities during operations, i.e. restrooms, so far as reasonably practicable, should be considered as part of the PCBUs planning.

PBCUs should also consider the requirements for storage of firearms when accessing amenities.

Safe custody or secured area for storage of AB and H category firearms is as per the *Firearms Act 1996 (NSW)* as well as the PCBU policies and procedures.

6.4 Working in isolation

A PCBU must manage the health and safety risks of workers in isolated working conditions.

The risk controls may include the following:

- establishing emergency communications between supervisors and workers, i.e. via phone or radio,
 - implementing check-ins at regular intervals,
 - ensuring emergency response procedures are in place and communicated,
 - managing the potential of fatigue, i.e. shift patterns, rosters, break times,
 - understanding and managing risks associated with travelling in remote areas where communication and access to services may be limited.
-

6.5 Psychosocial harms

Workers can be exposed to a combination of work-related psychosocial hazards and risks factors. A PCBU has a duty to manage the risk of psychosocial hazards in the workplace.

In determining the control measures to implement to manage the psychosocial hazard, PCBUs must have regard to all relevant matters including:

- duration, frequency and severity of exposure and how hazards may combine or interact,
- design of work and system of work,
- design, layout and environmental conditions of workplace,
- workplace interactions or behaviours,
- information, training, instruction and supervision provided to workers.

Some examples of psychosocial hazards may include:

- high job demands (e.g. high levels of physical, mental or emotional effort are needed to do the job),
- poor physical environments (e.g. performing hazardous work, conditions that affect concentration or are unpleasant),
- remote or isolated work (e.g. working extended periods alone),
- bullying and sexual harassment.

Further information on how to manage psychosocial hazards in the workplace can be found in the *Code of practice: Managing psychosocial hazards at work*. The code provides guidance on duties and practical strategies to manage and promote a mentally healthy workplace.

6.6 Exposure to noise

PCBUs must ensure the noise that a worker is exposed to at the workplace does not exceed the exposure standard for noise. The risk of causing permanent hearing damage is related to both the loudness of the noise and the duration and frequency of exposure.

Noise may be an issue in the transport and delivery of cash and valuable goods, and PCBU's must control risks relating to noise exposure, this may include the use of hearing protection and audiometric testing.

For further guidance refer to the *Code of practice: Managing noise and preventing hearing loss at work*.

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7 Incident notification

Part 3 of the WHS Act

WHS Act section 35

What is a “notifiable incident”

WHS Act section 38

Duty to notify of notifiable incidents

A ‘notifiable incident’ is:

- the death of a person,
- a ‘serious injury or illness’, or
- a ‘dangerous incident’ that exposes someone to a serious risk (even if no one is injured).

‘Notifiable incidents’ may relate to any person — whether an employee, contractor or member of the public.

A PCBU must ensure that SafeWork NSW is notified immediately after becoming aware that a notifiable incident has occurred. Notifications can be made by contacting SafeWork NSW on 13 10 50 or via the SafeWork NSW website: *Notify SafeWork*.

When a PCBU is made aware that a notifiable incident has occurred, the PCBU must:

- report it to SafeWork NSW immediately, and
- preserve the incident site until an inspector arrives or directs otherwise. This doesn’t prevent help being provided to an injured person, removing a deceased person, making the site safe to minimise the risk of a further notifiable incident, or to facilitate a police investigation.

Incidents involving multiple businesses or undertakings

If a ‘notifiable incident’ arises out of more than one business or undertaking then each must ensure that the incident has been notified to SafeWork NSW.

There is no need for all duty holders to notify — only one needs to. However, all duty holders retain their responsibility to ensure SafeWork NSW is notified, regardless of any agreement between them.

In these circumstances the duty holders must, so far as is reasonably practicable, consult, cooperate and coordinate to put appropriate reporting and notification arrangements in place.

Examples of these incidents are available in Safe Work Australia’s *Incident notification fact sheet*.

Enforcement action may be taken and penalties may be applied for not notifying notifiable incidents to SafeWork NSW. For more information see the SafeWork NSW website.

8 Appendices

Appendix A Glossary

Terms used throughout the Code that require definitions or descriptions.

Term	Description
Armoured vehicle	Purpose-designed vehicles that offer resistance to armed attack, overtly display company signage, and are staffed by armed, uniformed personnel.
Cash	Cash (other than coin) securities and other financial instruments (other than executed non-negotiable cheques and executed bank cheques), jewels and bullion.
Client	Any person, partnership, or company that uses the services of a licensed Operator.
Competent person	A person who has acquired through training, qualification or experience the knowledge and skills to carry out the task.
Courier	A company or employee of a company that transports commercial packages and documents.
Covert	The transport of valuables in an unmarked vehicle by non-uniformed workers.
Dangerous incident	<p>An incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to —</p> <ul style="list-style-type: none">(a) an uncontrolled escape, spillage or leakage of a substance, or(b) an uncontrolled implosion, explosion or fire, or(c) an uncontrolled escape of gas or steam, or(d) an uncontrolled escape of a pressurised substance, or(e) electric shock, or(f) the fall or release from a height of any plant, substance or thing, or(g) the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations, or(h) the collapse or partial collapse of a structure, or(i) the collapse or failure of an excavation or of any shoring supporting an excavation, or(j) the inrush of water, mud or gas in workings, in an underground excavation or tunnel, or(k) the interruption of the main system of ventilation in an underground excavation or tunnel, or(l) any other event prescribed by the regulations, <p>but does not include an incident of a prescribed kind.</p>
Duty holder	Any person who owes a work health and safety duty under the WHS Act including a PCBU, a designer, manufacturer, importer, supplier,

Term	Description
	installer of products or plant used at work (upstream duty holder), officer or a worker.
Hazard	A situation or thing that has the potential to harm a person. Hazards at work may include: noisy machinery, a moving forklift, chemicals, electricity, working at heights, a repetitive job, bullying and violence at the workplace.
Health and safety committee	A consultative body established under the WHS Act. The committee's functions include facilitating cooperation between workers and the PCBU to ensure workers' health and safety at work, and assisting to develop work health and safety standards, rules and procedures for the workplace.
Health and safety representative	A worker who has been elected by their work group under the WHS Act to represent them on health and safety matters.
High risk deliveries	The transportation of objects that are considered high value items which increases the risk and likelihood of robbery and the necessity for higher level risk management controls.
May	'May' indicates an optional course of action.
Must	'Must' indicates a legal requirement exists that must be complied with.
Officer	<p>An officer under the WHS Act is:</p> <ul style="list-style-type: none"> - an officer under section 9 of the <i>Corporations Act 2001</i> (Cth) - an officer of the Crown within the meaning of section 247 of the WHS Act, and - an officer of a public authority within the meaning of section 252 of the WHS Act. <p>A partner in a partnership or an elected member of a local authority while acting in that capacity, are not "officers".</p>
Operator	A PCBU engaged in the carrying of cash and valuable goods for clients.
Person conducting a business or undertaking (PCBU)	<p>A PCBU is an umbrella concept which intends to capture all types of working arrangements or relationships. A PCBU includes a:</p> <ul style="list-style-type: none"> - company - unincorporated body or association - sole trader or self-employed person. <p>Individuals who are in a partnership that is conducting a business will individually and collectively be a PCBU.</p> <p>A volunteer association (defined under the WHS Act) or elected members of a local authority will not be a PCBU.</p> <p><i>Note –</i></p> <p>A person may be both a PCBU, within the meaning of section 5 of the WHS Act, and a worker within the meaning of section 7 of the WHS Act.</p>
Psychosocial hazard	<p>A psychosocial hazard is a hazard that –</p> <p>(a) arises from, or relates to –</p>

Term	Description
	<ul style="list-style-type: none"> (i) the design or management of work, or (ii) a work environment, or (iii) plant at a workplace, or (iv) workplace interactions or behaviours, and <p>(b) may cause psychological harm, whether or not it may also cause physical harm.</p>
Psychosocial risk	A risk to the health or safety of a worker or other person arising from a psychosocial hazard.
Risk	The possibility harm (death, injury or illness) might occur when exposed to a hazard.
Risk control	Taking action to eliminate health and safety risks so far as is reasonably practicable, and if that is not possible, minimising the risks so far as is reasonably practicable. Eliminating a hazard will also eliminate any risks associated with that hazard.
Robbery	<p>Robbery or stealing from a person</p> <p>Whosoever – Robs or assaults with intent to rob any person or</p> <p>Steals any money or valuable security from the person of another – Crimes Act 1900 – Section 94.</p>
Safe area	<ul style="list-style-type: none"> (a) A place of safety within a building, structure or workplace <ul style="list-style-type: none"> i) which is not under threat from an emergency; and ii) from which people are able to disperse after escaping the effect of an emergency to a road or open space. (b) A roadside or open space.
Serious injury or illness	<p>An injury or illness requiring the person to have –</p> <ul style="list-style-type: none"> (a) immediate treatment as an in-patient in a hospital, or (b) immediate treatment for – <ul style="list-style-type: none"> (i) the amputation of any part of his or her body, or (ii) a serious head injury, or (iii) a serious eye injury, or (iv) a serious burn, or (v) the separation of his or her skin from an underlying tissue (such as degloving or scalping), or (vi) a spinal injury, or (vii) the loss of a bodily function, or (viii) serious lacerations, or (c) medical treatment within 48 hours of exposure to a substance, and includes any other injury or illness prescribed by the regulations but does not include an illness or injury of a prescribed kind.
Should	‘Should’ indicates a recommended course of action.
Situational awareness	The cognitive processes for building and maintaining awareness of a workplace situation or event (knowing what is going on around you).

Term	Description
Volunteer association	A group of volunteers working together for one or more community purposes where none of the volunteers, whether alone or jointly with any other volunteers, employs any person to carry out work for the volunteer association.
Work group	A group of workers established to facilitate the representation of workers by one or more health and safety representatives. A work group may be all workers at a workplace but it may also be appropriate to split a workplace into multiple work groups where workers share similar work conditions or are exposed to similar risks and hazards. For example all workers on night shift.
Worker	<p>Any person who carries out work for a PCBU, including work as an employee, contractor or subcontractor (or their employee), self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' or a volunteer.</p> <p><i>Note:</i></p> <p>A person may be both a worker, within the meaning of section 7 of the WHS Act, and a PCBU within the meaning of section 5 of the WHS Act.</p>
Workplace	Any place where work is carried out for a business or undertaking and includes any place where a worker goes, or is likely to be, while at work. This may include offices, factories, shops, construction sites, vehicles, ships, aircraft or other mobile structures on land or water.

Appendix B: Case study

Notifiable incident

A worker was transporting cash and valuables between client locations in a secured vehicle. During the journey, the vehicle was involved in a collision with another vehicle at an intersection. The force of the impact caused the worker's leg to be pinned between the vehicle's console and seat, resulting in a severe fracture to the lower leg.

After the collision, emergency services were called to the scene, and the worker was transported to a nearby hospital for treatment. The worker required surgery as an in-patient in a hospital to repair the fracture and as such, this incident is notifiable to SafeWork NSW.

For further information on Incident notification, refer to Chapter 7.

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Appendix C: Pre-start vehicle checklist

External checks:

- vehicle damage, including windscreen and antennas
- wheels and tyres
 - tyre pressure
 - tread wear
 - damaged or cracked rims or tyre walls
 - secure wheel nuts, i.e. not loose
- Lights and indicators
- Door locking mechanisms from outside

Internal checks:

- fuel
- seatbelts – frayed edges, buckle locking correctly, retraction working
- back-to-base radio with override button working, conduct a radio check
- mobile phones charged and operational, hands free available
- check operation of horns and lights
- door locking mechanisms from inside
- automatic door locking when back to base alarm activated during robbery
- equipment, i.e., first aid kit, torch, satellite phone for remote areas, etc.
- remotely activated vehicle central locking system (or similar) working
- drop safe (or similar) secured and in working order
- GPS working
- portable back-to-base duress alarm.

Appendix D: Sample risk register

Date:

Location:

Hazard	What is the harm that the hazard could cause?	What is the likelihood that the harm would occur?	What is the level of risk?	How effective are the current controls?	What further controls are required?	Actioned by	Date Due	Date Complete	Maintenance and review