

Statement in support of application for merger authorisation

Annexure MS12

RE: PROPOSED MERGER BETWEEN LINFOX ARMAGUARD PTY LTD AND PROSEGUR AUSTRALIA HOLDINGS PTY LTD

PROSEGUR AUSTRALIA HOLDINGS PTY LTD

Co-Applicant

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Cash In Transit Code of Practice



Prepared by:



Australian Security Industry
Association Limited

About ASIAL

Established in 1969, the Australian Security Industry Association Limited (ASIAL) is the peak national body for the private security industry in Australia.

ASIAL provides advice, assistance and representation to members in the security sector, reflecting its membership of owners and operators of security businesses providing all forms of manpower, cash in transit, electronic and associated security services.



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Foreword

This ASIAL Code of Practice on managing security risks associated with Cash In Transit (CIT) is to be read in conjunction with the approved code of practice under section 274 of the Work Health and Safety (WHS) Act.

It is a practical guide to assist members to meet their WHS responsibilities and importantly mitigate risks associated with the transportation and delivery of cash and/or other valuables by use of armoured, semi-armoured or non-armoured vehicle(s).

Scope and Application

This Code provides guidance for ASIAL members with employees predominantly involved in the cash in transit sector of the security industry. ASIAL members must observe this code as a minimum standard when conducting cash in transit activities.

This Code should also act as a minimum standard for the Cash in Transit Industry.

Legislation

CIT operators must at all times observe the relevant State, Territory or Federal legislation applicable to their business.

Legislation covering Cash in Transit activities in Australia include:

- Transport Industry Cash in Transit Award 2010
- Fair Work Act 2009
- Federal WHS legislation
- State WHS legislation
- State Licensing Legislation
- Financial Transaction Reports Act 1988
- Financial Transaction Reports Regulations 1990
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006
- Anti-Money Laundering and Counter-Terrorism Financing (Transitional Provisions and Consequential Amendments) Act 2006
- Privacy Act 1988 (including National Privacy Principles)
- AML/CTF Rules
- Cost Recovery Acts

1. Introduction

1.1 What is Cash In Transit?

CIT activities involve the transportation and/or delivery of money (cash, other than coin) and high value goods including jewellery, precious metals, luxury goods, securities and other financial instruments (valuable goods) by workers.

Transport can take place by road using armoured, semi armoured or non-armoured vehicles. Activities include:

- An escort service where the money or Valuable Goods are safeguarded in the course of transportation;
- Work performed in or in connection with cash servicing of Automatic Teller Machines (ATMs) or equivalent technology where cash is exposed.

1.2 Responsibility for Workplace Health and Safety

A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking and provide safe systems of work.

This duty requires the person to manage risks by eliminating health and safety risks so far as is reasonably practicable, and if it is not reasonably practicable to eliminate the risks, by minimising those risks so far as is reasonably practicable. It also includes providing and maintaining a work environment that is without risks to health and safety. These duties are owed by:

- a) businesses or undertakings that carry out CIT activities e.g. security providers;
- b) businesses or undertakings using security providers e.g. financial institutions and other clients;
- c) businesses or undertakings with management or control of a workplace e.g. shopping centre managers, and
- d) businesses or undertakings that design structures e.g. architects, designers and local councils approving the design.

Clients have a duty to manage the risk of armed robberies occurring when deciding on the location of ATMs and the method by which cash is collected from or delivered to their premises.

Workers have a duty to take reasonable care for their own health and safety and that they do not adversely affect the health and safety of other persons. Workers must comply with any reasonable instruction and cooperate with any reasonable policy or procedure relating to health and safety at the workplace. If personal protective equipment (PPE) is provided by the business or undertaking, the worker must use it in accordance with the information, instruction and training provided.

2. Risk Management

2.1 Identifying the hazards

Identifying hazards in the workplace involves finding risks and situations that could potentially cause harm to people.

Hazards associated with CIT activities can include:

- Robberies and armed hold-ups;
- Worker fatigue and stress;
- Manual tasks;
- Exposure to temperature variations;
- Traffic hazards;
- Slips, trips and falls;
- Use of firearms.

Potential hazards may be identified by:

- Inspecting the client work sites.
- Inspecting vehicles and equipment.
- Observing the systems of work and work practices.
- Assessing the routes for CIT transfers.
- Talking to workers about any problems they have noticed.
- Reviewing incident, injury and dangerous occurrence reports (e.g. hold ups).
- Determining the levels of training, experience and competence for the tasks.

2.2 Assessing the risks

Risk assessments must be carried out for all sites prior to CIT services commencing. In the case of an urgent or 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.

Risk Assessments must be:

- Conducted by persons holding a Certificate IV or Diploma in Security Risk and Management; or by an employee with at least 2 years relevant experience in the CIT industry, and any such risk assessment must be signed off by a person holding a Certificate IV or Diploma in Security Risk Management and that person must be appropriately licenced in the state or territory of operation to conduct risk assessments.
- Subject to re assessment in a changing threat environment and review of the effectiveness of risk controls applied;
- Assessment should be completed using a Risk Management – Principles and Guidelines approach (AS/NZS ISO 31000:2009).

2.3 Limits

- i. Cash to be collected and transported across the pavement during non-armoured operations must not exceed \$100,000 unless the risk assessment

indicates otherwise;

- ii. Cash to be collected utilising a non-armoured vehicle must not exceed \$350,000 in total vehicle limits;
- iii. If limits described in points 2.3 (i) or 2.3 (ii) are exceeded, armoured vehicles must be used unless the risk assessment indicates otherwise.
- iv. The transportation of valuable goods must be conducted in accordance with the risk assessment

2.3.1 Cash and Valuable Limits must be determined in accordance with:

- A risk assessment,
- Industry operational needs,
- This code and
- Insurance provider requirements.

3. Subcontracting Cash In Transit

3.1 Contracting arrangements

If an operator subcontracts another business (including a related entity) to carry out CIT work, the operator must ensure that the subcontractor carries out the work in accordance with this code.

The operator and contractor should agree on the safe work procedures, including arrangements for managing health and safety incidents. The operator should monitor the contractors' activities regularly.

Second tier subcontracting must not be undertaken.

4. Vehicles

Operators must ensure that:

- Vehicles are selected in accordance with the nature of the activity to be undertaken.
- The vehicle conforms to the Design Rules for motor vehicles.
- Vehicles are mechanically sound and serviced regularly by a competent person.
- Vehicles comply with State regulatory or statutory requirements.

ARMoured VEHICLES

Where required by regulation operators must ensure that armoured vehicles used for CIT activities carry the operator's signage and that the workers wear uniforms and carry firearms.

Where allowed by regulation in the state or territory covert armoured vehicles may be used.

Whether Overt or Covert armoured vehicles must include the following safety features:

- Armouring of vehicle to a minimum G2 specification (AS/NZS2343:1997) or any other Australian standard which replaces this standard from time to time.
- A system of secure partitioning (mantrap) that allows the crew to enter and exit the vehicle without exposing the crew and which restricts access to the vehicle cargo area by persons other than the crew.
- A secure transfer safe, thereby only exposing consignments carried across the footpath.
- A secure compartment to carry the collected cash consignments within the vehicle.
- Alternate communication method effective in two-way radio reception 'black spots'
- Mobile telephone capable of being used hands-free.
- Portable monitored duress alarm or equivalent technology
- Remotely activated central locking or other design method to prevent unauthorised access to the vehicle
- Engine immobiliser designed to prevent unauthorised ignition of the vehicles
- GPS or other tracking systems to locate the crew and the vehicle.
- A remote engine shut down capability.

SEMI-ARMoured VEHICLES

Semi-armoured vehicles used for CIT activities must have the following safety features:

- Armouring of the front cabin area of the vehicle to a minimum G2 specification (AS/NZ2343:1997) or any other Australian Standard which replaces this standard from time to time.
- A system of secure partitioning that allows the crew to enter and exit the vehicle without exposing the crew and which restricts access to the vehicle cargo area by persons other than the crew.
- On board duress alarm system
- drop safe and/or secure lockers to carry the cash or valuables
- alternate communication method effective in two-way radio reception 'black spots'
- Mobile telephone capable of being used hands-free.
- portable monitored duress alarm or equivalent technology
- remotely activated central locking
- engine immobiliser designed to prevent unauthorised ignition of the vehicles
- GPS or other vehicle tracking systems to locate the crew and vehicle.

- A remote engine shutdown capability

NON-ARMoured VEHICLES

Operators must ensure that non-armoured vehicles used for covert activities are unmarked and workers carrying out the covert activity should wherever possible be armed (in accordance with the state or territory regulations). Workers not in uniform should wear clothing applicable to the weather conditions and ensuring a covert type holster is worn in such a way that the holster and firearm cannot be seen by members of the public.

Vehicles used for overt activities carry the operator's signage and the workers wear uniforms and should wherever possible be armed (in accordance with the state or territory regulations).

Non-armoured vehicles must include the following safety features:

- On board duress alarm system
- Drop safe and/or secure lockers to carry the cash or valuables
- Alternate communication method effective in 'black spots'
- Mobile telephone capable of being used hands-free.
- Portable monitored duress alarm or equivalent technology
- Remotely activated central locking
- Engine immobiliser designed to prevent unauthorised ignition of the vehicles
- GPS or other vehicle tracking systems to locate the crew and vehicle.
- A remote engine shutdown capability.

5. Communication Systems

Where a CIT worker is isolated from the assistance of other persons because of the work site location or the nature of the CIT work, an effective communication system must be provided. This may include back-to-base communication equipment, personal duress alarms or equivalent technology and arrangements for emergency communication.

Assistance may include rescue, medical assistance and the attendance of emergency service workers.

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

6. Employees

All employees engaged in the provision of CIT services must hold a current valid security licence applicable to the

relevant State or territory in which they operate and the activities they perform.

Employees engaged in the provision of CIT services who carry a firearm must hold the relevant license issued by the State or territory in which they operate.

CIT businesses must carry out appropriate due diligence enquiries prior to employment or promotion of any employees including but not limited to:

- Criminal history check (which includes a 100 point identification check)
- Fitness for work checks
- Prior work reference checks

7 Training

Appropriate training at the workplace must be provided to:

- Workers engaged by a CIT business or undertaking, who participate in activities which have the potential to expose them to risk of injury or work-related illness.
- Managers and supervisors of workers carrying out CIT activities considered at risk of injury or work-related illness from robbery and/or who have responsibility for implementing safe work procedures
- Staff responsible for purchasing plant, PPE and for designing, scheduling and organising work activities.
- Safety and security risk assessors.

Training programs should reflect the specific requirements of the position and should include:

- The work health and safety duties of everyone involved in CIT activities
- Firearms accreditation (where applicable)
- Heavy vehicle training (where applicable)
- Security awareness training
- The nature and extent of hazards identified in relation to the work performed
- How to respond during a robbery or violent incident
- Hazard and incident reporting systems which include 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 (for example hazardous manual tasks); hold-ups, attempted robbery, vehicle collision or other type of incident
- Safe work procedures and other control measures adopted to minimise the risk or effects of robbery, other incidents, injury or illness. This should include instruction on:
 - Departure, arrival and on-site procedures
 - Staffing levels.
 - Communication systems (including a secondary

system)

- Cash limits.
- The use and operation of vehicles and their safety features
- Plant and associated equipment.
- When and how to use PPE including the selection, fitting, proper care and maintenance of PPE.
- Correct use of firearms.
- 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.
- The effects of robbery on affected workers and/or others undertaking cash-in-transit activities.
- AUSTRAC Compliance programmes A and B to ensure staff understand their legislative requirements and are fully compliant.
- Any training required by State or Territory regulatory body.

8 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) should include:

- Back to base radio or equivalent technology
- Personal duress alarms
- Portable duress alarm or equivalent technology
- Firearms (in accordance with the state or territory regulations).
- Non-slip footwear

Vehicles should carry PPE such as, but not limited to:

- First Aid Kits equipped with medical PPE including facemasks and disposable gloves for CPR.

9 Managing Fitness for Work

Fitness for work includes fatigue and the effects of alcohol and other drugs on workers. The effects can be identified as a state of impairment resulting from mental or physical exertion and is associated with reduced performance, impaired decision-making, lack of motivation, tiredness and poor concentration. These effects are often exacerbated by work practices e.g. long hours etc. and use of alcohol and other drugs by workers.

Operators should have in place policies and procedures for avoiding, identifying and dealing with the “fitness for work” of CIT workers. This should include, as a minimum, training in fatigue management and random and incident based alcohol and drug testing in the workplace.



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