



## **Security Specialists Global**

**Response to Australian Banking Association Ltd (cash-in-transit services) – Application for authorisation AA1000654**

**April 2024**

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Ms Elizabeth Batten  
Australian Competition & Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601  
Via email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)

**AUSTRALIAN BANKING ASSOCIATION - APPLICATION FOR AUTHORISATION  
[AA1000654]**

Dear Ms Batten

Thank you for alerting us to the Australian Banking Association's (ABA) application for authorisation to discuss this topic.

I am writing to express our support for the granting of the authorisation. The continuity of cash-in-transit services is critical to our businesses and supporting the community.

## **Introduction**

Security Specialists Global (SSG) would like to thank you for your email dated 28th March 2024 alerting us to the Australian Banking Association's (ABA) application for authorisation.

We wish to emphasise the significance of the proposed authorisation with conditions until October 31, 2024, as outlined in the draft determination. This decision is of immense importance for our operations and the broader community, and we express our full support in granting it.

SSG plays a pivotal role in maintaining a sustainable cash in transit (CIT) industry and ensuring cash accessibility in Australia. This is crucial not just for our business but also for the broader community. We recognise this significance and fully support the proposed authorisation with conditions.

SSG supports the various submissions by the other parties, including the need to ensure the professional standards of the CIT Industry. However, it does not agree that a one-size-fits-all approach or all CIT activity should be undertaken by one provider throughout Australia is appropriate.

## **Background**

SSG is a major provider of armed and unarmed covert vehicles and security officers who conduct cash and valuables escort services throughout Australia. This practice results from identifying safe work practices for our staff and responding to the needs of our customers.

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- Operates nine sites around Australia, New Zealand and Singapore.
  - Employees include full-time, part-time and casual staff.
  - Engages with 80-plus subcontractors across Australia.
  - Pays above award wages with Collective Agreements approved by Fair Work Australia.

## **Current Situation**

Over the last 30 years, considerable debate has been about the safest way to move cash in Australia.

The major CIT providers Armaguard, Chubb, and Prosegur all portrayed that the only way to move cash safely was using large armoured and armed guards provided by their organisations.

Now, there is one.

An armoured and armed guard may be the most appropriate based on location, amount of money, and other factors.

Would we ever consider only having one air carrier or one food retailer?

The simple answer is no.

## **Cash in Transit Code of Practice**

The Cash in Transit Code of Practice was implemented in 2018 as an outcome of the Road Safety Remuneration Tribunal. The guide is designed to help members fulfil their workplace health and safety obligations and reduce risks associated with transporting and delivering cash and/or other valuables using armoured, semi-armoured, or non-armoured vehicles.

This code offers advice for ASIAL members whose employees are mainly engaged in the CIT sector of the security industry. ASIAL members must follow this code as a minimum standard when carrying out cash-in-transit activities.

Additionally, this code serves as a baseline standard for the CIT Industry. The code has become an industry benchmark for all CIT providers.

## **Regulation of CIT Providers**

The regulation of CIT providers in Australia is more stringent than that of crowd control or other licence classes.

The requirements include additional training, insurance, and inspections from the regulator if firearms are held.

The Code of Practice, in conjunction with the regulators of security providers in each state, for example, the Security Licencing Enforcement Division (NSW Police), ensures that all CIT providers comply with the same safety requirements as Armaguard.

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## **Impact on Community Safety**

The result of forcing small to medium sized businesses to have limited access to cash and alternatives to services is that they take matters into their own hands. These practices include sending staff to the bank to collect cash rather than using a CIT provider for ad hoc services, as cash is difficult to access.

## **Flexibility of Service**

As outlined in the Review of Banknote Distribution Arrangements: Issue Paper Section 4: The Cash in Transit Industry Endnotes, "Providers of wholesale cash distribution have changed over time. For example, Chubb and Toll Secure provided these services until Prosegur acquired them in the 2010s. Cash Services Australia, partially owned by a number of commercial banks, had a cash management function and was also bought by Prosegur in 2017. In the early 2000s, Linfox acquired Armaguard from Mayne Nickless and Chubb bought Brambles' armoured car business. This practice has limited the opportunity for CIT providers other than Armaguard to access cash to support business operations.

## **Difficulties in Accessing Cash**

As outlined in the Review of Banknote Distribution Arrangements: Issue Paper Section 4.3 Responses to changes in the cash environment, "Recently, several banks have sold parts (or all) of their off-branch ATM fleets to third-party operators (generally CIT companies), who are looking to operate these ATM fleets on a utility basis where banks can pay for their customers to access the machines on a fee-free basis."

As a result of this practice, all other cash-in-transit providers are seen as competitors to Armaguard, and access to cash and change reserves is problematic.

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All CIT businesses in Australia are disadvantaged as they are not being offered the opportunity to access cash like Armaguard, which restricts trade within the marketplace.

## **Summary**

SSG applaud the revision of the current practice and strongly urges the Australian Banking Association to consider the reviewed practice of cash transportation nationwide.

Other professional cash-in-transit services, such as SSG, can provide the same, more flexible, and adaptable services to meet the needs of the Australian community.

We look forward to the opportunity to discuss options for future consideration.

Yours sincerely

Ron Turner

Managing Director