



HEALTH AND SAFETY
AUTHORITY



Safety Health and Welfare at Work

**Guidelines for Employers, Employees
and Clients involved in the Cash in
Transit Industry**



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1. INTRODUCTION

These guidelines are designed to give practical advice to those working in the Cash in Transit (CIT) industry so that the safety and health of all employees is protected and ensured. Employers, employees and client companies who follow the guidelines will be taking the recommended steps to protect the safety and health of workers and will be demonstrating their intentions to achieve best practice. The document has been drawn up following considerable consultation with those involved in the CIT industry at all levels and others with more general and national responsibility for security and for safety and health.

WHAT WILL THE GUIDELINES ACHIEVE?

The specific objectives of the Guidelines are to;

- ◆ Promote and protect the health, safety and welfare of people working in the CIT industry and others who may use the services of CIT companies or who are engaged in carrying cash in the conduct of their own business or employment
- ◆ Provide guidelines on the standards of safety to be provided by those who conduct CIT business or others as above
- ◆ Ensure that risks to safety and health in the CIT industry are identified, assessed and eliminated or controlled in the most appropriate way
- ◆ Promote consultation and co-operation between employers, employees, contractors, sub contractors, clients and controllers of premises in ensuring the safety of their employees

WHAT IS THE SCOPE OF THE GUIDELINES?

The guidelines cover;

- ◆ Employers, employees, self employed contractors or subcontractors employed in the transportation of cash or valuables under contract arrangement with or on behalf of other persons or businesses and associated administrative work

- ◆ Employees involved in the servicing or maintenance of Automatic Teller Machines (ATMs) where cash is exposed
- ◆ Other employers who require their staff to transport significant* sums of cash on behalf of their business.
- ◆ Clients who use the services of Cash in Transit operators

The Guidelines do not apply to situations where cash is handled in an incidental manner as part of the commercial transactions of a workplace.

WHAT ARE THE SAFETY AND HEALTH ISSUES PARTICULAR TO THE CIT INDUSTRY?

The primary risk to CIT employees is that of armed attacks by criminals. This risk increases where there is a perception of access to cash by the CIT employees. By removing the ability to access cash it will reduce the risk from the main hazard faced by CIT employees. This can be achieved by using modern techniques which, for example, might ensure the cash is always carried in dye boxes which render the cash unusable if stolen.

CIT employees are involved in the transfer of cash from/to premises where transactions may be done by cash. One of the factors to consider whilst implementing these guidelines is the fact that a security employee's place of work can change rapidly as they move from place to place in the course of a working day.

WHAT IS THE LEGAL FRAMEWORK WHICH SUPPORTS THESE GUIDELINES?

- ◆ The Safety, Health and Welfare at Work Act 2005
- ◆ The Safety, Health and Welfare at Work (General Application) Regulations.

* (The definition of "significant" is necessarily a subjective one. It is important that the particular circumstances of each case, including the circumstances of the person who is intending to carry the cash, are assessed. It is always best to err on the side of optimum protection)

These apply to both those employed and to those whose safety and health may be affected by work activities in this sector. These laws require the employer to ensure the health, safety and welfare of his or her employees. Employers who share a workplace with another employer or self-employed person must co-operate in implementing any necessary safety, health, welfare or occupational hygiene provisions. This means, for example, a client engaging a security company for the transfer of cash will have a shared responsibility with the security company in ensuring adequate safety, health and welfare standards for employees involved.

The Organisation of Working Time Act 1997, the Security Industry Employment Regulation Orders and the Private Security Services Act 2004 are also relevant.

2. RESPONSIBILITIES

WHAT AND WHOSE RESPONSIBILITIES?

Employers: have the major responsibility for providing a safe and healthy place and systems of work for their employees. As with all travelling workers the means of transport can provide a safe place of work should a threatening incident occur. Obviously the security company will rely on the cooperation of their clients and the employees themselves when providing a safe place of work.

Employers must conduct a risk assessment and prepare a **Safety Statement** which is, in effect, a written programme for safeguarding the safety and health of employees while they work. The relevant sections must be communicated to all employees*.

* See the HSA "Guidelines on Risk Assessments and Safety Statements" and the HSA Guidelines "Safe to Work" which is aimed at small businesses. The procedure is summarised later in these Guidelines.

There should be a structured forum through which staff consultation on issues of safety and health is carried out, either by way of a safety committee or safety representative.

Employees: have a responsibility;

- to take reasonable care for their own safety and health and for the safety of others affected by their acts or omissions
- to cooperate with their employer and clients sharing a place of work on safety matters
- to use appliances, equipment or personal protective equipment in a manner so as to provide the protection intended
- to report all defects affecting safety and health to their employer as soon as possible.

Employees have the right to ask for information on safety, health and welfare matters from their employer.

Clients: A client who engages a security company and shares the place of work is obliged;

- to cooperate in the provision of adequate conditions
- to coordinate agreed action between the client and the CIT operator in respect of its own personnel and facilities for prevention and protection from risks
- to keep employees of both companies properly informed about such risks. This communication must include information on specific hazards, including written risk assessments, which detail the hazards and specify the arrangements for eliminating or controlling those hazards which exist at the place of work.

(See Section 4 on Hazard Identification in the CIT sector below. This information may be in the form of a client's **Safety Statement**)

3. PREPARING THE SAFETY STATEMENT

The Safety Statement is based on the principle that safety can be managed because most accidents and ill health are foreseeable and can usually be prevented. It is basically an action programme setting out how safety and health is managed in the workplace to ensure that risks are identified, assessed and eliminated or controlled. A comprehensive Safety Statement is a practical tool for reducing accidents and ill health at work. There are six simple steps to be followed, all of which are important in developing a safety and health management programme for the organisation:

- ◆ Draw up a safety and health policy
- ◆ Identify the hazards
- ◆ Carry out a risk assessment
- ◆ Decide what precautions are needed
- ◆ Record findings including who is responsible
- ◆ Review program and update

The preparation of the Safety Statement is not an end in itself but should help to achieve the main safety, health and welfare requirements which are set out below.

- ◆ A safe place of work (e.g. vehicle , depot etc.)
- ◆ Safe access/ egress (e.g. into and out of place of work)
- ◆ Safe plant and machinery
- ◆ Safe pavement transfer systems
- ◆ Safe systems of work (e.g. arrangements for safety/lone workers)
- ◆ Information, instruction training and supervision
- ◆ Appropriate Personal Protective Equipment (ppe)
- ◆ Emergency planning and procedures (e.g. Fire and other emergencies)

- ◆ Safe articles and substances (e.g. Chemicals)
- ◆ Appropriate welfare facilities

It is the employer's duty to achieve and maintain these standards but success will depend on co-operation from the client and employees. See Appendix 1 - Template for Risk Assessments and Appendix 2 - Risk Assessment Examples. Employees should only be provided with information relevant to their safety and health and not detailed operational matters which are security sensitive and may make an employee or their family vulnerable to duress. The principle of "need to know" applies to security matters but not to safety and health issues.

4. HAZARD IDENTIFICATION IN THE CIT SECTOR

Some of the methods used to identify hazards include looking at incident/accident records, consulting with employees, on site inspections, observing systems of work, surveying the route taken by vehicles, assessing training needs, testing of equipment and consulting with clients and industry associations internationally.

Hazard Examples:

- ◆ Tasks such as ATM servicing, driving, pick up and delivery
- ◆ Locations – distance to parking space
- ◆ Communications – especially for lone employees, for non English speaking employees or those whose language skills are not fluent. Contingency for radio black spots
- ◆ Time of day – rush hours, pub closing times
- ◆ Shift work
- ◆ Manual handling
- ◆ Environmental factors such as high temperatures, fumes from traffic
- ◆ Syringe attacks, hostage situations (so called Tiger attacks), knife attacks

5. RISK ASSESSMENT

A risk assessment is a careful examination of what in the workplace could cause harm to people, so that one can weigh up whether enough precautions (control measures or procedures) have been taken or whether more should be done to prevent harm. It is the combination of the likelihood of an adverse event combined with the seriousness of the outcome, e.g. armed robbery is a rare event but potentially fatal and therefore requires a high level of control measures.

The employer is responsible for preparing written risk assessments for typical hazards associated with CIT security work and for ensuring that written risk assessments are made available from the client on hazards associated with the place of work. A written risk assessment must be prepared for each of the various possible work situations and employees must be kept informed and instructed of the arrangements in place for ensuring their safety and health.

The risk assessment should take into account the place of work, the work tasks, communication systems including radio black spots, time of day, use of personal protective equipment, manual handling, environmental factors such as heat/cold, traffic and pedestrian flows. It should also take into account the proximity and suitability of parking to the place of collection/delivery, staffing levels required to safely perform the work and those non-employees who may be affected by the work activities.

6. SAFE OPERATING PROCEDURES

Safe operating procedures must ensure clearly defined and communicated roles and duties of each employee performing CIT operations. Such procedures include:

- ◆ Pre departure check lists

- ◆ Regular testing of all vehicles and safety features e.g. communication systems, duress alarms
- ◆ Cross pavement protection systems (including Intelligent Bank note Marking Systems)
- ◆ The use of personal protective equipment (helmets, stab resistant/antiballistic vests)
- ◆ Procedures to maintain confidentiality (e.g. description of sites by code rather than name)
- ◆ Variation in crewing, delivery/collection times and routes where possible,
- ◆ Site arrival and departure arrangements.
- ◆ Deferring collections/deliveries or alerting back up where suspicious behaviour or other potential hazards have been identified at the site
- ◆ Procedures in case of vehicle collision, vehicle or equipment breakdown
- ◆ Adherence to predetermined cash limits
- ◆ Hold up and post hold up procedures

As pavement protection systems have improved the focus for criminals has been to target employees and their families in duress situations in which hostages are taken. Each employer should draw up contingency plans to deal with the notification and appropriate response to such a situation in consultation with the Gardai.

There should be measures to address fatigue and stress, allowances for tea, lunch and toilet breaks and a system for the review of all operating procedures and systems.

7. TRAINING

The responsibility for ensuring employees are adequately trained to carry out their CIT duties, rests with the employer. The safety, health and welfare aspects of the training are critical to the protection of employees. The sector has seen considerable growth

in the number of non-English speaking persons employed and this must be addressed in emergency and day-to-day communications training.

The CIT industry should ensure that all relevant national standards are applied to the training of employees.

8. RESPONSIBILITIES OF CLIENTS

Clients have a responsibility to reduce the level of risk posed to employees and other persons engaged in CIT operations by ensuring that adequate security arrangements are in place when cash is being collected and delivered on their premises. Reducing the risk of robbery can be achieved by arranging procedures and organising the premises, as far as reasonably practicable, to ensure safe management of the transfer of cash. Such relevant arrangements include, where possible, providing secure parking spaces for CIT vans, so as to enable parking as near as possible to the collection/delivery point, offering safe access and egress to CIT employees, installing CCTV in appropriate areas and ensuring that a site specific risk assessment is carried out prior to the siting of Automatic Teller Machines (ATM's). Clients also have a responsibility to co-operate with CIT providers to ensure appropriate cross pavement protection systems are used.

The voluntary Code of Practice for the Safe Transport of Cash in Ireland may assist clients in fulfilling their responsibilities.

ARRANGEMENTS FOR SAFETY AND HEALTH

Controlling the risk of any hazard which can cause harm means that one does all that is reasonably practicable to ensure the hazard will not injure anyone. This is required by law.

See Appendix 2 - Risk Assessment Examples covering a range of hazards in the Security Industry. These can be used in the process of drawing up your own Risk Assessment and Safety Statement.

APPENDIX 1

TEMPLATE FOR RISK ASSESSMENT

Company name	Address	Phone: Fax:	Assessment undertaken by Date: 00-00-00
<i>Identified Hazards and Risks</i>	<i>Who might be harmed</i>	<i>Required controls</i>	<i>Responsible persons</i>

APPENDIX 2

RISK ASSESSMENT EXAMPLES

(This list of hazards and controls is not intended to be exhaustive. While they may apply to certain situations in your workplace, the controls that you require to comply with the law can only be determined by your own risk assessment)

Noname Security Ltd.	Fort Knox Business Centre Co. Dublin, Ireland	Phone: Fax:	Assessment undertaken by Date: 00 - 00- 00
<i>Identified Hazards and Risks</i>	<i>Who might be harmed</i>	<i>Required controls- Examples</i>	<i>Responsible persons</i>
Fumes from vehicle exhaust	Employees using vehicles in congested traffic.	<ul style="list-style-type: none"> Switch to internal air recirculation system. See Standard Operating procedure X 	Employer.
Assault whilst loading ATM machine	Employee	<ul style="list-style-type: none"> Clients to have a separate room for ATM (a bunker) which is secure Where no bunker, loading to take place outside hours of access by public Mobile phone or land line in bunker for use in emergencies CCTV sited to cover outside area of bunker or appropriate spy hole. CCTV camera to be high enough to stop interference with it. Critical incident response and debriefing procedures 	Employer/ Client
Physical Violence Risk of attack by criminals (see also knife and gun attack section).	All employees	<ul style="list-style-type: none"> Locking and securing the place of work. Telephone/radio communication/ lone worker devices with amber/red alert. Controlled Periodic Checks with base and between operatives. Wear appropriate dress code - clip on tie, no scarfs, no large earrings etc. Automatic warning devices (e.g. panic alarms, no movement alarms, etc.) Stab resistant/ bulletproof vests. Instruction and training to reduce risks of confrontation and violence. Report all incidences. Provision of trauma counseling. Varying routes and times of delivery/collections Using code words for locations to preserve confidentiality Fall back systems for use in suspicious circumstances See Standard Post Hold Up Operating procedure X 	Employer

Security Ltd.	Fort Knox Business Centre Co. Dublin, Ireland	Phone: Fax:	Assessment undertaken by Date: 00 - 00- 00
Identified Hazards and Risks	Who might be harmed	Required controls- Examples	Responsible persons
Knife or gunshot wounds inflicted in the course of a robbery	Employees	<ul style="list-style-type: none"> Do not resist attacker, comply with their instructions Show your hands, avoid prolonged eye contact with aggressor Have first aid kit with pressure bandage and training in first aid available Stab resistant vests/bullet proof vests See Standard Operating procedure X 	Employer
Night work / Shift work Risks of Mental/Physical strain	Employees	<ul style="list-style-type: none"> Health Surveillance. See Standard Operating procedure X 	Employer
Strike around the head and neck area	CIT employees when out of vehicle	<ul style="list-style-type: none"> Wear head protection that protects against blows but allows for ventilation of scalp to encourage compliance of wearing it in warm weather. To preserve good peripheral vision and not interfere with hearing. 	Employer
Visual display units. Risk of Eyestrain, Backache	All employees who are habitual P.C. users (>1hr. continuous per day)	<ul style="list-style-type: none"> Carry out risk assessment on workstation (e.g. ergonomics, height, space, glare etc) Organise work activities to include frequent breaks from monitors (e.g. periodic rounds etc) Provide eye-tests. Ensure workstations comply with regulations. Consult and inform employees. See Standard Operating procedure X 	Employer
Manual Handling. Risk of Back injury	Employees	<ul style="list-style-type: none"> Carry out risk assessment of manual handling Eliminate where possible. Mechanise the work (e.g. Forklift trucks, lifting appliances, pallet trucks, trolleys with spring elevating loads as trolley empties, dollies etc.) Instruction and training in proper manual handling techniques. Refresher training. See Standard Operating procedure X, HSA Guidance Y. 	Employer

Noname Security Ltd.	Fort Knox Business Centre Co. Dublin, Ireland	Phone: Fax:	Assessment undertaken by Date: 00 - 00- 00
Identified Hazards and Risks	Who might be harmed	Required controls- Examples	Responsible persons
Syringe attack	Employees	<ul style="list-style-type: none"> Vaccination with Hepatitis B Post exposure prophylaxis procedure for exposure to HIV Personal protective equipment 	Employer
Robbery	Employees	<ul style="list-style-type: none"> Consider denying access to cash by employees by using an enclosed system where cash is always enclosed by a Note destruction system 	Employer
Fire Risk of burns or smoke inhalation possible death	Employees	<ul style="list-style-type: none"> Passive fire protection built into structure (e.g. Fire rated stairways, doors etc.). Active fire protection (e.g. automatic detection and alarm, sprinklers, fire extinguishers, fire blankets). Adequate fire exits (i.e. unobstructed and not locked) Routine fire drills (i.e. twice annually). See Standard Operating procedure X 	<ul style="list-style-type: none"> Client Employer
Electricity Risk of Electrocution or burns	Employees	<ul style="list-style-type: none"> All circuits protected by Residual Current Devices (RCD), which are checked routinely. 110V supply as appropriate (construction and outdoor work). Ensure all leads checked routinely. Report defective equipment immediately. See Standard Operating procedure X, HSA Guidance Y. 	<ul style="list-style-type: none"> Client Employer
Plant & Machinery. Risk of entanglement in moving machinery.	Employees	<ul style="list-style-type: none"> Purchased with CE Marking Installed, used and maintained as per manufacturer's recommendations. Adequate guarding protects access to danger zones. Emergency stop buttons and other safety devices are clearly labeled. Report all defective equipment immediately. Provide proper personnel protective equipment e.g. goggles, gloves etc. Authorized operators receive proper instruction, training and supervision. See Standard Operating procedure X 	<ul style="list-style-type: none"> Client Employer

CONTACTS FOR FURTHER INFORMATION

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*Achieving a
Healthy
and Safe
Working Life
-Together*

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