Violence at the Place of Work

Occupational Health and Safety Authority
Malta
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Violence at the Place of Work
An Integrated Policy for the Security of Persons inside Financial Institutions

1. Introduction

Any institution which handles cash, be it a bank, any other financial institution, or any other company where money is collected and kept temporarily, can be attractive to people with intent of theft. Armed robbery in such cases is a distinct possibility and when it occurs can result in cash losses, damage to property, bodily harm or aggravation.

Whenever an armed robbery occurs, members of staff and clients will be at risk of injury or even death. Because robberies can be particularly traumatizing, the psychological and mental well-being of those involved could be seriously hindered. As far as members of staff are concerned, a reduction in the quality of the work might result. Such ill-effects can develop chronic manifestations, a factor worthy of consideration by any service institution which depends on the high quality and the efficient and effective service delivery levels.

Any financial institution has as its main objective the generation of further wealth, money and profit and will go to great lengths to protect its business interests and the money, which it handles. It also has a legal obligation to ensure and uphold the health and safety of all persons who may be affected by the work being carried out\(^1\), and therefore a legal obligation to deal with the risk of violence at work\(^2\).

The Occupational Health and Safety Authority Act, 2000 lists those measures that need to be undertaken taken by an employer to prevent physical, psychological ill-health, injury or death. Such measures should not be limited to the protection of those employed, but by virtue of the same Act, should also be extended to protect the health and safety of clients accessing the workplace premises as well as any other workers, not directly employed by the institution, but who may be employed on contract.

The risk of armed robbery needs to be considered as any other risk to health and safety. This would entail the formulation of clear policies and procedures to be adopted in minimizing risk and in dealing with the consequences. When developing such internal policies, it is also vital for the organization to establish and maintain strong links with the police authorities and with other institutions as appropriate.
2. Managing Occupational Health and Safety

2.1 Managerial Commitment

The promotion, maintenance and protection of the highest degree of workers’ physical, mental and social well-being is primarily a managerial responsibility, at par with other managerial tasks such as production targets and the quality of customer services provided. Management must be able to demonstrate through policies and procedures, its commitment towards achieving high levels of occupational health and safety.

This commitment towards health and safety can be demonstrated in various ways, such as by allocating sufficient human and financial resources, and by establishing organizational structures to support managers and employees in fulfilling their health and safety tasks and responsibilities. The challenge is to institutionalise health and safety within the planning process, in such a manner that the resources assigned must be allocated within business units as part of the overall running costs.

2.2 Workers’ Participation

Cooperation between management and workers or their Health and Safety Representatives is an essential element of the organizational measures that need to be taken in order to reduce and manage risks to health and safety. Workers’ participation is a fundamental right, and a duty of an employer. Employee participation has been identified as a major determinant of successful occupational health and safety management, and a major contributing factor towards risk control. Thus, the full participation of workers in any occupational health and safety programme designed for their benefit will ensure the efficacy of such measures.

2.3 Training

The continuous integration of improvements into the work process is vital, but it can only be guaranteed if everyone concerned is properly trained. The primary role of training is to promote action, to stimulate awareness, to impart knowledge and to help recipients to adapt their own role. As in other situations, training should feature as an integral part of job training and incorporated into daily work procedures.

3. The Integrated Policy for the Security of Persons

In order to ensure that satisfactory and durable results are achieved, the enterprise should formulate and put in place a coherent policy aimed at reducing the risk of violence and at minimizing the effects of such violence when it occurs. The policy, otherwise known in this
document as the Security Policy, should be clear, implementable and well-defined, designed to fit the particular organization for which it is intended. When determining the key elements of a successful Security Policy, coordination between the various organizational sectors involved is essential. An integrated Security Policy must indicate the roles incumbent upon the various sectors involved (including that of bringing policy information to the notice of everybody) and should also take into account the role of external key players. A successful integrated policy should identify and indicate the person having overall responsibility for the implementation of the policy, and who will also be the prime mover in the process of translating policy objectives into practice.

An Integrated Security Policy should be formulated in consultation with, and the participation of all the members of staff. Workers’ representatives should also facilitate this process and ensure that discussions involve all the workers. Once the policy is formulated, it should be ensured that its contents are communicated effectively, and known and understood by everybody. This action would also serve to reassure the members of staff that the organization has a planned, satisfactory response for potential incidents. It should have the acceptance of, and be endorsed by senior management.

In taking preventive and protective measures, the employer should be guided by a few general principles, having a well-established order of priority, which are often referred to as the Hierarchy of Preventive and Protective Measures (Box 1).

<table>
<thead>
<tr>
<th>Box 1 : Hierarchy of Preventive and Protective Measures</th>
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<tbody>
<tr>
<td>Avoid risk</td>
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<tr>
<td>Identify hazards associated with work</td>
</tr>
<tr>
<td>Evaluate those risks which cannot be avoided</td>
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<tr>
<td>Control at source those risks which cannot be avoided</td>
</tr>
<tr>
<td>Take all measures to reduce risk as much as reasonably practicable</td>
</tr>
<tr>
<td>Give priority to collective protective measures over individual protective measures</td>
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<tr>
<td>Adapt the work to the worker, particularly in so far as the design of work places is concerned</td>
</tr>
<tr>
<td>Adapt to technical progress in the interest of occupational health and safety</td>
</tr>
<tr>
<td>Develop a coherent overall prevention policy which covers technology, the organization of work, working conditions, social relationships and the influence of factors related to the working environment</td>
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Violence at the Place of Work
If the Security Policy is to remain valid in time, and so as to guarantee its effectiveness in fulfilling its stated objectives, it should be monitored, reviewed and evaluated regularly, particularly following an incident involving violence or attempted violence, whenever new hazards are introduced and following organizational changes.

The Security Policy can be expressed in terms of organizational mission and vision statements, as a document that reflects and refers to the declared health and safety values of the enterprise. Thus it should reflect the employer’s responsibility to provide a safe and healthy working environment.

Key elements to be addressed include the establishment of:

- a risk management process;
- an education and training programme;
- a timely post-violence support system;
- a predefined public relations strategy.

4. Managing Risk

Risk assessment is an employer’s implicit duty under the Occupational Health and Safety Authority Act, 2000. Subsequent regulations which shall be published under this Act specifically require every employer (and self-employed person) to carry out, or to ensure that is carried out, an assessment of all the occupational health and safety hazards which may be present at the place of work and the resultant risks involved. Such assessments should consider the risks to the health and safety of workers to which they are exposed whilst at work, as well as the risks to the health and safety of other persons, which risks arise out of, or in connection with the work being carried out, or by the conduct of the undertaking. Where five or more workers are employed, an employer shall keep in his possession written copies of such assessments, and shall ensure that they are updated regularly. The assessments referred to in these regulations shall be reviewed whenever there is any major change in working conditions, or whenever the employer has reason to suspect that they are no longer valid. This review process should be undertaken regularly, and should form part of standard management practices.

No general rules exist about how a risk assessment should be undertaken – this depends on the nature of the organization, the individual branch and the type of service being offered. Where the employer does not have the competence within the organization to carry out such an assessment, external competent persons or services may be contracted for the task;
however, in such circumstances, the employer shall not be discharged from such incumbent duties arising out of the Occupational Health and Safety Authority Act, 2000, and out of regulations made under the Act.

Following the risk assessment, the employer shall decide upon those protective and control measures by which to minimize risk and the possible consequences on health and safety. Ideally, the siting of branches, their design and security measures to be adopted should be a priority issue, and decided upon at the outset with care and after consultation with competent security experts.

Organizations having a network of branches should choose preventive measures that suit particular branches, based on the risks at each one. Several preventive measures that could be considered include the provision of:

- control mechanisms which limit access (without actually hindering it) including double doors;
- appropriate quality hinges, bolts and locks for all doors, whether for normal use or for use during an emergency;
- adequately secured quality locks for windows;
- suitable and sufficient lighting;
- signs which highlight the levels of security to be found in that particular branch;
- adequate intruder alarms, of suitable standards, to protect all parts of the premises;
- the placing of security dyes in money sacks or containers, which are automatically released during unauthorised opening;

The cash-handling area is usually the commonest target for robbers, and appropriate measures should be taken. Where possible, such areas should be handled as far away as possible from entrances to the organization. Other measures that should be considered include:

- cash-dispensing restrictions (such as time-delay locks);
- cash transfer facilities (such as trays under fixed screens);
- the provision of security glazing, the resistant capabilities of which being known to the organization;
silent panic buttons, particularly in those areas which are not well visible to other members of staff;

the installation of surveillance equipment, which if suitably made obvious, may serve as an effective deterrent (the success of such equipment as a tool in preventing violence, and in bringing the perpetrators to justice, depends however on its overall quality, its location and its adequate maintenance).

### Other Precautions

Various other precautions may be taken by an organization to deter criminal intent. These include the training of staff so as to impart an image of alertness and confidence. All members of staff should have suitable means of identification, and where appropriate should be able to request confirmation of a visitor’s authenticity. Other simple measures include requesting all visitors to remove crash helmets before entering a branch.

### Screening

For the purposes of this document, screening may be defined as the search for previously unrecognised diseases, conditions or circumstances caused or influenced by work or which can influence work. Thus, screening may be used to identify criminal records of a serious nature, or the dependence of a worker on drugs, including alcohol. If these factors are deemed by an employer to be incompatible with employment within that organization, then this should be stated in the Security Policy, together with the steps that are to be taken in the eventuality of detecting a positive factor.

Confidentiality of the findings must be guaranteed at all times, and the dissemination of information concerning any individual should be performed on a need to know basis. Strong contacts should be established and maintained with those agencies that work in this field so as to facilitate rehabilitation of the workers concerned.

The formulation of this part of the Security Policy should be undertaken in consultation with the workers and their representatives.

### Education and Training

Education and training need to cover various aspects and should be made available to the various sectors involved. They can serve to reduce the risk of violence, and to minimize the consequences in case of an incident involving violence. Education helps to identify the early signs of the effects of robbery, aiding the recovery process in those affected.
Several areas could be identified as requiring education and training, and include:

- how the members of staff are to act during a robbery, so as to limit the consequences;
- the legal responsibilities of the organization and its employees;
- security awareness and procedures;
- the identification of telling signs and symptoms in workers following incidents;
- the scope and contents of the Security Policy.

6. **Post-Violence Support System**

Individuals vary in their reactions to incidents involving violence. Whereas a few might remain unaffected, the majority will experience symptoms of a reaction to different degrees. In situations which remain undetected (especially in those individuals who show no ill effects while at work, but who experience symptoms in other environments) the process can become chronic and will affect the performance of the individual with repercussions for the organization.

Thus it is imperative that the organization sees to timely and suitable interventions by competent persons following such incidents, including by counsellors and by police officers (who will inform the workers of what action is required to be taken).

The organization may also consider extending its services to those clients and contracted workers who were present at the time of the incident.

Counselling by a competent/professional person, on the other hand could be used either as a tool to facilitate recovery after an incident, but also as a support initiative for those individuals who are encountering problems of a social, physical or psychological nature, be they personal or of a work-related nature. Such problems may result in further problems to the individual as well as to the organization itself, if left unchecked.

Workers may also be suffering from stress related to the perceived risk of violence, and even though they may never experience a violent crime themselves, they could still be suffering from stress-related symptoms as would affect their ability to work effectively. Counselling therefore should also be made available to these workers.
7. A Communications Strategy

Such a predefined strategy will ensure the confidentiality of the Security Policy. It should also address such issues as press liaison and coverage of the event. A robbery should never be glorified and arrangements should be made with the press so as not to disclose the amount of money stolen. However, aspects of the robbery which indicate the problems faced by the robbers (such as the presence and release of security ink) should be highlighted. On the other hand, details of the methods used by the criminals should not be disclosed, so as to avoid encouraging duplications of the crime.

8. Conclusion

This document is intended to stimulate action by organizations in developing their own individual Security Policies, tailor-made to their circumstances and their requirements. It is not intended to be replicated in its entirety, but should serve as a foundation upon which organizations can formulate and determine their own Security Policy.

Several issues may be contentious, as is screening, but nonetheless they require discussion, and where appropriate, introduction in the eventual policy.

It has to be highlighted that such a Security Policy should not be intended to make organizations that handle money, secure from robbery, but is intended to protect the people working therein, clients and any other persons who have reason to be inside the organization.

Since the risk of violence and armed robbery must be considered as any other occupational risk to health and safety, the security policy must be incorporated within the overall Health and Safety Policy for the organization, and should not be considered separately.

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1 Act XXVII of 2000, the Occupational Health and Safety Authority Act.
2 The risk of violence may arise from armed robberies, attempted robberies, burglaries, and violence from irate clients.
3 General Provisions for Health and Safety at Work Places Regulations.