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Crowd Control and High Risk Security Operations

Business Name:		ABN:	
Business Address:			
Contact Person:	Phone:	Email:	

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU OF THE PROJECT

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:			
Signature:		Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS

	SCOPE OF WORKS
Client:	
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	

SAMPLE

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RISK MATRIX

LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			**Elimination** Remove the hazard.
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	**Substitution** Replace the hazard.
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work start	Isolation Isolate People from the hazard
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	**Engineering** Isolate the hazard / Administrative Chang
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	PPE

Risk Rating & Required Action:

4A	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
3H	Review and approve additional controls before the task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:

Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	No injury	no schedule impact	Deviation caught and corrected on site

Notes on Hierarchy of Controls:
Remember to apply controls in the preferred order shown by the coloured pyramid:
1. **Eliminate**
2. Substitute
3. Isolate
4. Engineering
5. Administrative
6. PPE

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

aligned with Safe Work Australia's Managing the risk of fatigue at work *(2023) and ISO 45001:2018 clauses 6–8.*

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, WHS Duties and Legal Compliance	• Lack of clear allocation of WHS responsibilities for security and crowd control operations under WHS Act 2011 and associated Regulations • Directors and officers not exercising due diligence in monitoring high-risk security work (e.g. forced evictions, robbery procedures, piracy threats) • Inadequate consultation with workers, HSRs and contractors regarding changes to security procedures or venues • Failure to integrate WHS duties with liquor licensing, security licensing and crowd control legislation and conditions of entry • Outdated or non-existent WHS risk management procedure specific to violent and aggressive behaviour, robbery and piracy threats • Poor incident notification and regulatory reporting systems for notifiable incidents and serious injuries arising from assaults • Insufficient contractor management framework for contract crowd controllers, security guards and cash-in-transit providers	4A	• Establish and maintain a WHS Governance Framework that clearly documents duties, delegations and accountability for high-risk security and crowd control operations in line with WHS Act 2011 • Adopt and regularly review a WHS Risk Management Procedure that explicitly covers crowd control, nightclub security, forced eviction, robbery procedures and response to piracy or hijacking threats • Implement a formal due diligence program for officers, including scheduled WHS performance reviews, regulatory compliance audits and reporting of key WHS indicators for security operations • Develop a legal register aligning WHS obligations with liquor licensing, security industry licensing, use-of-force requirements, cash-handling standards and maritime/aviation security rules where applicable • Embed consultation processes (toolbox talks, WHS committee, HSR meetings) focused specifically on violence, aggression, robbery risks and systems performance rather than individual behaviour alone • Implement a formal incident notification and escalation protocol, including criteria for reporting notifiable incidents to the regulator and serious assaults to police • Introduce a contractor and labour-hire WHS management system that requires documented WHS plans, licences, insurances and alignment with the organisation's violence and robbery policies • Undertake periodic external WHS and legal compliance reviews of security and crowd control systems and implement corrective actions within set timeframes	3H
2. Security Risk and Threat Assessment System	• No structured security and threat assessment process for events, nightclubs, transport hubs or high-risk venues • Failure to identify specific threats such as piracy, armed robbery, violent or aggressive passengers, and high-risk evictions • Infrequent or informal review of threat levels despite seasonal or event-driven changes (e.g. major events, holiday peaks, pay days) • Reliance on anecdotal information rather than systematic data (incident	4A	• Implement a formal Security and WHS Risk Assessment Procedure that considers likelihood and consequence of violence, robbery and piracy, using a documented risk matrix aligned with WHS Act principles • Conduct site-specific and activity-specific security risk assessments for nightclubs, public venues, transport routes, high-value cash movements and piracy-prone areas • Establish triggers for re-assessment (e.g. change of venue layout, new entertainment offerings, history of assaults, police crime alerts, changes in piracy threat level) • Integrate historical incident data, CCTV reviews, police intelligence and insurance loss data into periodic threat assessments • Document and communicate risk ratings, operating limits (such as maximum capacity and staffing ratios) and key control measures to supervisors and security teams	3H

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	reports, near misses, crime statistics) to assess risk • Lack of integration between security risk assessments and emergency, business continuity and insurance requirements • Poor communication of risk profile and operating limits to frontline supervisors and control room operators		• Ensure security risk assessments are formally reviewed prior to major events, high-risk promotions, or operations in areas with elevated piracy or robbery threats • Link outcomes of security risk assessments to budget decisions for engineering controls (barriers, CCTV, duress systems, hardened cash rooms) and staffing levels	
3. Policies for Use of Force, Evictions and De-escalation	• Absence of clear, lawful and practical policies governing use of force during crowd control, forced evictions and dealing with aggressive passengers • Inconsistent approaches to evictions and refusals of entry leading to escalation, injuries and legal claims • Policies that focus solely on compliance and not on practical de-escalation strategies and WHS risk reduction • Lack of clear guidance on managing vulnerable persons (intoxicated, drug-affected, minors, people with disability or mental health conditions) • Inadequate controls for situations requiring forced physical removal or opening doors/windows forcefully to access or restrain persons • Failure to mandate the presence of a supervisor or additional support for high-risk interactions such as forced eviction or removal from vehicles		• Develop and implement a comprehensive Use of Force and Eviction Policy aligned with WHS Act, criminal law, common law duty of care and relevant security licensing conditions • Include clear escalation pathways prioritising negotiation, verbal de-escalation and withdrawal before any physical contact is considered • Define mandatory criteria and authorisation processes for forced evictions, including requirement for supervisor approval and minimum staffing support • Incorporate guidance on dealing with intoxicated, drug-affected, vulnerable or aggressive persons, including when to call police or emergency services rather than proceed with an eviction • Establish procedures for any action requiring forceful opening of windows or doors (e.g. vehicles, rooms), ensuring assessment of risk of entrapment, falls, lacerations and asphyxiation • Require pre-incident planning for planned high-risk actions (e.g. eviction of known violent patron, removal of aggressive passenger mid-route) including communication plans and safe locations • Ensure policies explicitly prohibit unauthorised restraint techniques (choke holds, positional asphyxia-prone holds) and define safe restraint principles and time limits • Review eviction and use-of-force incidents at management level to identify system failures, training needs and to refine policies	2M
4. Workforce Competency, Licensing and Training	• Security and crowd control personnel lacking mandated licences or units of competency for crowd control and high-risk security operations • Inadequate training in de-escalation, conflict management, dealing with violent or aggressive passengers and robbery scenarios	4A		2M

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	• No structured training in piracy threat response for transport, maritime or aviation-related operations • Insufficient understanding of organisational policies on evictions, use of force, robbery procedures and weapons management • Inadequate refreshers leading to skill fade in managing high-adrenaline situations, communication and legal boundaries • Supervisors promoted without appropriate leadership or WHS risk management capability			
5. Staffing Levels, Role Design and Fatigue Management	• Inadequate staffing numbers or skill mix for expected crowd size and risk profile (e.g. nightclub peak periods, high-risk events, piracy-prone routes) • Rosters that promote excessive hours, insufficient breaks or back-to-back night shifts leading to fatigue and reduced situational awareness • Solo working in high-risk locations such as carparks, ATMs, loading docks, secure cash rooms or isolated parts of a vessel • Poorly defined roles and responsibilities for crowd controllers, robbery response teams, emergency threat responders • Lack of contingency staffing for sudden spikes in risk (e.g. unexpected crowd surges, intoxication levels, or aggression) • Over-reliance on inexperienced or casual staff during critical high-risk periods	3H		2M
6. Physical Environment, Layout and Crowd Flow Design	• Venue or vehicle layout that creates pinch points, blind spots, crush risks and poor escape routes during crowd surges or violent incidents	4A		2M

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	• Poorly designed entry and exit controls leading to uncontrolled queues, aggression and pushing in nightclub and event environments • Lack of secure separation between high-risk areas (cash handling points, DJ booths, control rooms, bridge areas on vessels) and public zones • Insufficient or poorly located barriers, bollards and segregation equipment to manage queues and prevent vehicle-hostile acts • Doors and windows that are difficult to access or operate safely under duress, encouraging forceful opening that may cause injury • Inadequate safe rooms or retreat areas for staff under threat of violence or robbery			
7. Security Technology, Monitoring and Communications Systems	• Inadequate CCTV coverage of high-risk areas such as entrances, dancefloors, queues, cash handling points and vehicle boarding areas • Faulty or unreliable duress alarms, radios, intercoms or maritime/aviation communication systems during critical incidents • Lack of real-time monitoring capacity for crowd density, aggression indicators or piracy threats along transit routes • Poor radio protocols causing confusion, delays or miscommunication during violent incidents, robberies or evictions • No redundancy in communications for remote or high-risk locations (e.g. maritime piracy zones, remote carparks, loading docks) • Failure to securely record and store CCTV and audio for evidentiary and investigation purposes	4A		2M

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8. Crowd Management Planning and Event Control	• No overarching crowd management plan for regular nightclub operations or special events • Failure to manage venue capacity and crowd density, leading to crush, trampling or escalated violence • Inadequate queue management and patron screening, increasing tension and aggression at entry points • Lack of protocols for staged shutdown or partial evacuation when crowd behaviour deteriorates • Poor separation of conflicting patron groups (e.g. rival groups, intoxicated vs. family groups) • Insufficient coordination with event organisers, bar staff, transport providers and police	4A		2M
9. Violent and Aggressive Person Management (Passengers and Patrons)	• Lack of a structured approach for identifying and managing early signs of aggression or violence in passengers or patrons • Inconsistent responses to abusive, threatening or violent behaviour leading to escalation • No clear thresholds for barring, offloading passengers or refusing service based on behaviour and safety risks • Insufficient systems to flag repeat offenders or banned individuals across venues or routes • Inadequate controls to protect staff during volatile interactions (e.g. confined vehicle spaces, dancefloors, queues)	4A		2M

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10. Robbery, Cash Handling and Piracy Threat Procedures	• No formal robbery or piracy response procedures, leaving staff to improvise under extreme stress • Inconsistent instructions regarding resistance, pursuit or confrontation of offenders • Inadequate systems to secure and transfer cash, high-value items or cargo, increasing robbery or piracy attractiveness • Failure to segregate public and cash-handling or secure cargo areas, exposing staff during count and transfer activities • Exposure of staff to firearms or weapons due to poor design of counters, cabins or bridges • Insufficient coordination with police, maritime or aviation security authorities regarding robbery and piracy risks	4A		2M
11. Psychosocial Health, Trauma and Critical Incident Support	• Repeated exposure of security staff to violence, aggression, robbery, and traumatic events without adequate psychological support • Organisational culture that normalises abuse and discourages reporting psychological injury or distress • Lack of structured debriefing, counselling and return-to-work planning after critical incidents • Inadequate management training in recognising and responding to early signs of psychological harm, burnout or cumulative trauma • Stigma associated with accessing mental health support leading to under-reporting and deterioration of worker wellbeing	3H		2M

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12. Alcohol, Drugs, Weapons and Contraband Management	• Inadequate screening for weapons or contraband at nightclub and event entries, increasing risk of stabbings, shootings or glassing • Poorly defined procedures for managing intoxicated and drug-affected patrons or passengers, leading to unpredictable aggression • Inconsistent enforcement of house policies and licence conditions relating to intoxication and disorderly conduct • Lack of clear processes for seizure, recording and secure storage of prohibited items or weapons • Staff impairment due to alcohol or drugs, compromising judgement and increasing risk during security operations	4A		2M
13. Vehicle, Vessel and Facility Access Control Systems	• Uncontrolled access to areas such as loading docks, backstage zones, bridges, control rooms or secure cabins • Tailgating and bypassing of access control systems resulting in unauthorised persons in high-risk spaces • Inadequate screening or verification of contractors, delivery drivers and visitors entering restricted zones • Poor integration between electronic access systems, keys, passes and manual sign-in procedures • Inability to quickly lock-down or isolate areas during violent incidents, robberies or piracy attempts	3H		2M
14. Incident Reporting, Investigation and Learning Systems	• Under-reporting of assaults, near misses, threats, robberies and piracy-related incidents by staff	3H		2M

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	• Focus on blaming individuals rather than identifying systemic causes and control weaknesses • Inconsistent or poor-quality investigations that fail to address root causes such as training gaps or layout issues • Lack of action tracking and closure of corrective actions arising from violent incidents • No feedback loop to workers on changes made following incident reports, leading to disengagement				
15. Emergency Preparedness, Evacuation and External Coordination	• Lack of integrated emergency plans for violent incidents, active armed offenders, robberies, fires, medical emergencies and piracy events • Confusion among staff about roles during partial or full evacuations in crowded environments • Insufficient drills for realistic high-risk scenarios, leading to poor performance when incidents occur • Poor liaison with police, ambulance, fire and maritime or aviation authorities regarding likely response times and protocols • Inadequate arrangements for safe assembly, crowd control and accounting for staff and patrons after evacuations	4A			2M
16. Continuous Improvement, Auditing and Contractor Oversight	• Static WHS and security systems that are not updated in response to emerging threats, new legislation or incident learnings • Lack of systematic internal audits of crowd control, robbery and piracy risk controls	3H			2M

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	• Poor oversight of contracted security providers leading to inconsistent standards and unmanaged liabilities • Fragmented documentation and record-keeping preventing effective review of training, licences and incident history • Management focus on cost over safety, leading to erosion of key control measures over time				