

# **Cash Management at Shopping Centres**

## **Policy Guidelines**

14 September 2007

## Definitions

**Associated stakeholders:** These are organisations/clients that, directly or indirectly, contribute towards the cash management value chain and/or reduction of the risk of crime that relates to the transportation, movement or handling of cash or valuables. Included in this are CIT companies, retailers and banks

**Doctrine:** The cash in transit doctrine could be described as a set of central beliefs and principles adopted by the industry to guide the preparation and employment of its resources and could also represent a distillation of best practices concerning the employment of capabilities.

**Cash in transit:** The cash in transit industry and the specific resources engaged in the transporting or carrying of either the client's cash and/or valuables for reward.

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# 1. Introduction

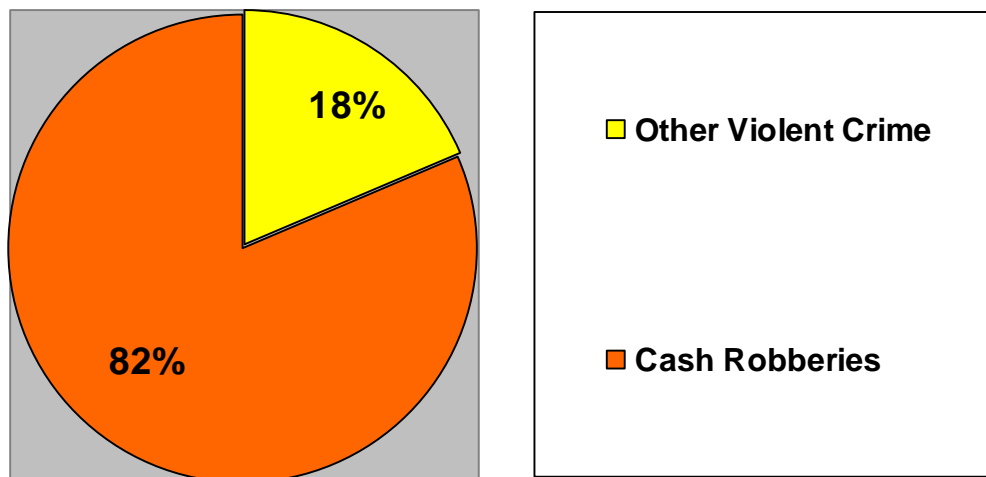
Cash robberies are the cause of numerous deaths and injuries every year and impose enormous costs on government and business, while deterring domestic and foreign investment. The indiscriminate, brash and violent nature of these robberies continues to make headline news in the media which, has increased feeling of fear amongst the public at large and has the potential to contribute towards negative perceptions of the country.

Cash robberies at shopping centers, which house both banks and retailers are a major threat to shopping centers and because of the public use of these shopping centers not only contributes to public feeling of insecurity generally but also on the image of safety at shopping centres.

All businesses are vulnerable to these violent attacks and shopping centers which house many of these businesses have become targets of these robberies. Cash robberies have become a common threat faced by shopping centers across the country. This threat consequently requires an increased level of commitment and co-ordination by the business sector, and in particular enhanced co-operation between tenants, CIT companies and shopping centers.

Between January and June 2007 of the 265 incidents of violent crime recorded at shopping centres around the country, 216 of these incidents involved cash robberies.

**Breakdown of extent of cash robberies occurring at shopping centres Jan – July 2007**



## 2. Background

Whilst many shopping centers continue to commit resources to address violent crime, with notable successes, these initiatives are deficient in a number of critical aspects, including the following:

- ∅ Whilst the individual projects may be well conceived and structured, these are generally insufficient on their own and should be integrated as part of a holistic approach;
- ∅ There is generally poor integration and co-ordination across shopping centers (intra) and within business sectors (inter), thus leading to poor alignment and a lack of synergy.

There are currently no clear guidelines and policies governing cash management at shopping centres and cash is managed in a non-standard and disjointed manner. There are no agreed-upon performance measures existing to guide the process for cash management at all shopping centres.

The aim of this document is to present policy guideline intended to reduce the risk of aggravated robberies through the development of more effective systems for cash management that can be implemented at shopping centres across the country.

The guidelines address:

- The unnecessary movement of cash at shopping centres
- A set of standards for the movement of cash at shopping centres
- A set of standards for the storage of cash at shopping centres
- A set of guidelines addressing ATM management at shopping centres

## 3. Processes involved in the development of the document

The policy guideline document is based on a number of different processes including:

§ **Engaging different role-players and stakeholders in discussions aimed at identifying problems and best practices regarding cash management at shopping centres:-** The implementation of effective cash management process at shopping centre requires the commitment and participation of different associated stakeholders in the process of developing the policy guidelines. Workshops and discussions were held with a number of these different stakeholders and a draft of the policy guidelines circulated for comment prior to finalisation.

§ **Identifying key risks and problems experienced at shopping centres:-** Based on a survey of shopping centres and on reported incidents, key risks were identified that need to be addressed as part of the policy document

§ **Identifying systems which could be introduced at existing shopping centres to reduce risks and improve cash management systems:-** Through engagement with different stakeholders best practices were identified which if implemented at all shopping centres would reduce the risk of cash robberies at shopping centres

§ **Identifying systems and structures that need to be addressed in designing and management of new shopping centres:-** Key to the policy guidelines is the processes and systems required for the implementation of the guidelines as well as the roles and responsibilities of the associated stakeholders

#### 4. Key problems areas

Cash management processes at shopping centres are aimed at addressing three areas:

- i. Target hardening where it is made more difficult for armed robbers to target cash at shopping centres
- ii. Ensuring safety of customers and staff
- iii. Denying robbers access to large amounts of cash aimed at discourage repeat robberies.

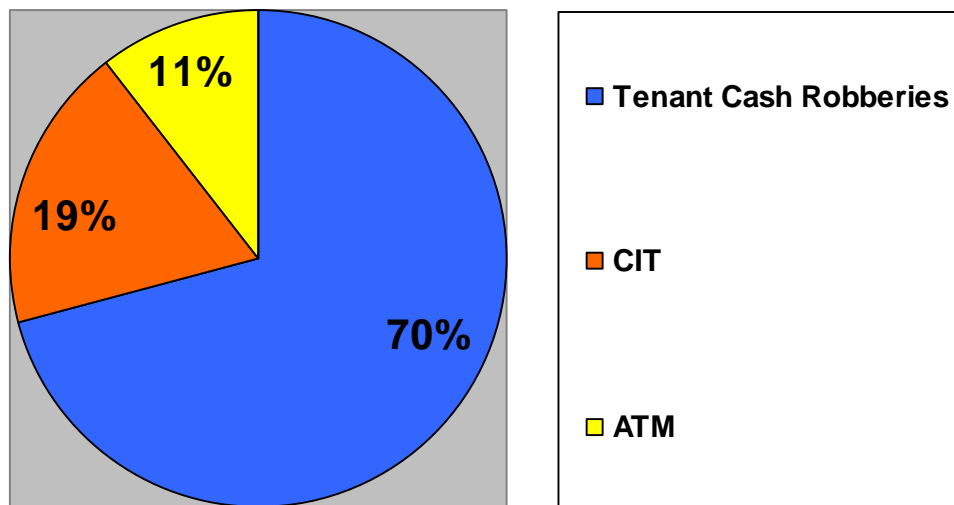
In this regard three broad areas of cash management that shopping centres need to address

- **Storage and internal management of cash by tenants and shopping centres:-** Cash robberies involving perpetrators targeting tenants and shopping centre premises with the view of obtaining cash from tills or storage areas account for the majority of violent crime occurring at shopping centres. This includes retail and bank robberies as well as robbery of cash linked to parking payments. Between January and July 2007 there were 216 incidents where cash stored at shopping centres was targeted. In many instances vulnerabilities in security and management of this cash by tenants or shopping centres has contributed to the risk of these robberies. Improved security and management of cash can substantially reduce the risk of these cash robberies.
- **Movement of cash at shopping centres:-** Cash robberies involving cash being moved through shopping centres has become a major risk for shopping centres. These cash robberies include cross pavement cash-in transit (CIT) heists where cash-in transit service providers collecting or delivering cash at shopping centres are targeted for the cash they are carrying and robberies where tenants carrying large sums of money through the centre for deposits at local banks. While the number cross pavement heists occurring at shopping centres is significantly less than robberies which target cash stored at shopping centres the high profile and violent nature of these instances pose a serious threat to shopping centres. The majority of robberies linked to movement of cash at shopping centres relate to cash in transit service providers being robbed on the premises of shopping centres, there are also risks related to tenants who do not make use of cash-in-transit service providers and who carrying large sums of money through the

shopping centres. Tenants carrying large sums of money on their person through shopping centres provide a vulnerable target for armed robbers. To reduce the risk of armed robberies associated with the movement of cash there is a need to both reduce the movement itself and to secure what movement that does occur at shopping centres.

- **ATMs at shopping centres:-** Since the end of 2006 there have been an increasing number of ATM attacks involving the use of commercial explosives to access the machines more recently a number of these attacks on ATMs have been carried out by armed perpetrators. The threat linked to these ATMs attacks now involves not only the threat posed by the commercial explosives used but also violence used by the perpetrators involved in these attacks in the commission of the attack. While most ATMs attacks have occurred at sites not situated at shopping centres between January and July 2007 there were 23 recorded incidents of ATM attacks at shopping centres. Therefore securing ATMs at shopping centres has become an important aspect of cash management at shopping centres.

**Breakdown of types of cash robberies at shopping centres Jan – July 2007**



To reduce the risk of cash robberies at shopping centres it is necessary to:

- Develop a set of standards to govern movement of cash at shopping centres
- Develop a set of standards for the management of cash within the shopping centres and how existing cash management systems in place could be improved.
- Develop a set of guidelines to address ATMs at shopping centres

In developing these standards and guidelines, consideration needs to be given to the nature of different shopping centres. In this regard it is important to recognize that there are different categories of shopping centres and what would be possible and applicable to a regional or super mall would not necessarily be applicable to a value centre, strip mall or small standing centre. Equally cash management processes able to be implemented by large retailers who deal in large sums of cash will be different to those possible for small

retailers who cash takings and storage is relatively small. Therefore the policy guidelines address different approaches for different types of shopping centres as well as minimum requirements for different types of tenants dependant less on their size and more on the cash sums handled by these tenants.

## 5. Cash Management Systems at shopping centres

While cash management is the responsibility of the individual tenants, the risk cash robberies pose to the shopping centre generally and the public using the shopping centre necessitates shopping centres managers and owners engage with their tenant to reduce this risk. In this context it essential that shopping centre owners and managers recognize the need to play a more active role in ensuring vulnerabilities in cash management systems are addressed by their tenants. How retailers/tenants manage their cash can no longer be the sole domain of the individual tenants and shopping centres managing and owner companies, who have a duty to ensure as safe a shopping environment as possible, need to ensure weak cash management systems which expose the centres to risk are addressed by the different tenants.

Some retailers and tenants already have comprehensive policies and systems in place which govern their in store cash management, others have less effective systems and processes in place. The responsibility for recording, verification and reconciliation remains the sole responsibility of the retailers/tenants and the shopping centre management's involvement in determining standards for cash management only cover aspects of management linked to possible risks of armed robberies.

There are significant differences between the retailers/tenants situated at shopping centres. These tenants vary in size of floor space, trading density as well as in the amount of cash managed. For the purpose of this document large retailers/tenants refers not just to the size of floor space but also trading density and amount of cash managed by the retailers/tenants.

### 5.1 Large retailers/tenants

Cash management procedures at large retailers/tenants needs to address two areas:

- i. Cash available at tills and point of sale
- ii. Storage of bulk cash

#### *i. Cash available at tills and point of sale*

The tills are a vulnerable point with regard to cash robberies and the strongest deterrent is the amount of money available at the tills and point of sale. Large tenants dealing in cash need to limit the amount of cash available at these tills and points of sale:

- The amount of money used for floats needs to be limited (the suggested amount is between R500 and R1000.00)
- There should be approved limits on the amount of money allowed to be kept in at the tills at anyone time (While the specific amount will vary depending on the retailer and place of trading the bank limit recommended is set at R2000.00)
- Tills should be skimmed regularly and tenants need to have stipulated skimming procedures in place to govern this process.
- During peak trading periods the regularity of skimming needs to be increased

- Money skimmed from tills needs to be moved immediately and directly to the cash office where it will be secured.
- If docking stations are used to secure the cash these docking stations need to be armed when in use.
- The retailers/tenants need to be on high alert during skimming processes

#### *ii. Storage of bulk cash*

Large retailers/tenants need to have secure cash office where cash removed from the tills and points of sale is secured after being skimmed. These cash offices need to have restricted access. Some of the requirements include:

- Cash offices should be secured at all times and access to this office restricted. General staff and the public should not have access to the cash office.
- The cash offices should be equipped with at least a category three drop safe.
- All money skimmed should be dropped immediately into the drop safe.
- The only available cash in cash offices should be the cashier floats held in the float safe. .

### **5.2 Smaller retailers/tenants**

Smaller retailers/tenants who receive and store less cash than the larger tenants are often less vulnerable regarding cash robberies. This does not mean that these retailers/tenants should not have effective cash management systems in place to reduce their risk. However the systems required and able to be implemented by these retailers/tenants are not as extensive as those required by larger retailers/tenants. Some of the key issues that need to be implemented as part of cash management processes for these smaller tenants include:

- Never handling large amounts of money in general view of the public
- The amount of money in the till or point of sale should be limited similar to the limitations placed on larger retailers.
- Smaller retailers/tenants do not necessarily need to have cash offices but they should have drop safes installed on the premises to store cash.

### **5.3 ATM situated inside retailers/tenants premises**

A number of retailers have ATMs situated inside their stores and the replenishing of these ATMs pose a risk regarding armed robberies.

- Store management should not hold the keys to ATM's.
- ATM's should not be replenished by the stores themselves and representatives of the banks should be responsible for replenishing these ATMs
- These ATM's should only replenished outside trading hours

### **5.4 Cash management under specific circumstances**

Some retailers particularly in rural areas undertake pension pay-out at their stores. The amount of cash available in store during these pension payouts makes these stores vulnerable to cash robberies. It is therefore necessary for these retailers/tenants to have systems and processes in place to minimize their risk on pension payout days. In this regard stores that are involved in pension payout should:

- Not pay pensions from the tills and should have a secure designated pension pay-out area

- Some stores involved in large lotto payouts created special cash offices to manage the lotto funds and according to these retailers this system reduced their threat of cash robberies. A similar process should be followed regarding pension payouts and retailers involved in pension payouts should create special cash offices for this pension money.
- Retailers paying out pensions need to have clear security plans in place on pension payout days and this should include increased visible security at stores payout days
- Retailers and shopping centre managers need to liaise with the police to ensure co-operation and improved police visibility on pension payout days

## 6. Movement of cash at shopping centres

Bulk money is often at greatest risk when being moved within the centre and a key aspect to reducing this risk is ensure effective systems are in place governing cash movement at shopping centres. This can entail bulk cash being moved between the cash office, drop safe and the parked CIT vehicle and bulk cash carried through the centre for deposit at local banks.

Cross pavement Cash in Transit (CIT) heists, where CIT companies are robbed on site at shopping centres has become a major concern for both CIT companies and shopping centres. In this instance the guards and the general public are exposed to the inherent risk of bodily injury or death and, therefore, all resources should be utilized to reduce this risk. The key consideration should be “the safety of CIT operators, staff working at the centre and the public must always be a first consideration”. Therefore the co-operation between the CIT companies, users of CIT services and controllers of premises is of paramount importance and all these role-players should contribute towards the minimising the risks of armed robberies.

The CIT doctrine developed as part of the Cash Risk Management (CRIM) processes refers to the movement towards the compartmentalisation of CIT operations where the public and centre staff are not exposed to the associated risk is an essential aspect to reducing the risks associated with movement of cash. All processes should be designed to prevent or minimise CIT guards contact with the public and staff of the centre.

### 6.1 Reducing the risks related to movement of cash at large Malls and shopping centres

One of the key means of reducing the risks associated with movement of cash at shopping centres would be through the creation of a cash hub at the shopping centres. This cash hub needs to then be linked to carefully planned and implemented systems where cash moves from the tenants to the cash hub. These cash hubs and associated systems would not only avert the movement of armed CIT companies through shopping centres but could also reduce the amount of money held in cash offices administered by the different retailers/tenants.

The cash hub approach would involve the execution of a secure area to which the different tenants could send their cash and the implementation of secure systems to transport case from the tenants to the cash hub.

The development of cash hubs linked to systems to move cash from the tenants to the cash hub is an important means of reducing the risk associated movement of

cash at larger shopping centres and Malls and should be considered an essential aspect of cash management processes developed by these shopping centres.

*i. Develop of a physical cash hub*

This would entail the establishment of physical point where all cash from tenants would be moved. This would require a physical centre with secure access and separate entrances and exits not accessible to staff of the centre or the public. The minimum requirement for this cash hub would be:

- A brick and mortar structure equipped with seismic sensors
- 24 hour monitored CCTV system at the hub (the monitoring of the systems would be the responsibility of the entity administering the cash hub)
- Separate access and egress routes for both vehicles and people staffing the hub
- Interlocking access and egress control for both personnel and vehicles
- Bullet resistant doors and windows
- Facilities for a control room within the hub which will be managed by the entity administering the cash hub
- The cash hub should be managed and controlled by a separate entity either through the banks themselves or by a preferred CIT service provider.

*ii. Systems to move cash to the cash hub*

There are two means by which the cash can be moved from the tenants to the cash hub. The first is through an air-tube system and the second through a “smart cross payment cash carrier system”. The first, although a more expensive system, should be the preferred system as it would remove the movement of cash from all public areas of the centres. The air-tube system would entail different tenants being linked into an air-tube system through which cash is then sent directly to the cash hub. The second would require the movement of a secure armed trolley which moves to the different tenants collecting cash that is then taken directly to the cash hub.

*iii. Advantages of the cash hub system*

The cash hub creates the opportunity either for the cash to be recirculated back into the centre or for CIT service providers to pick up and deliver cash directly to and from the cash hub itself without these CIT service providers entering the public areas of a shopping centre. The cash hub particularly if the air-tube system is used would allow more regular and secure movement of cash from tenants thus reducing the risk of cash robberies at tenant premises.

*iv. Tenants and the cash hub*

The ideal situation would be to ensure that all tenants within the larger malls and shopping centres are linked to the cash hub system. However some of the smaller tenants may find the costs of the system prohibitive and a basic minimum should be that all large tenants are linked to the cash hub system and no CIT service providers operate outside of the cash hub system.

## **6.2 Addressing the movement of cash at small shopping centres**

While the cash hub system should be a basic standard implemented at all large malls and shopping centres, the system may not be affordable and practical at some of the small shopping centres. At these smaller centres, CIT service providers maybe required to service some of the anchor larger tenants. At these smaller shopping centres a set of minimum guidelines governing the movement of cash and CIT operations need to be implements.

### *i. CIT service providers*

The CIT service providers allowed to operate at these shopping centres need to be registered CIT service providers. Recently a CIT forum was created and doctrine developed to guide CIT operations. CIT companies operating at these centres need to ascribe to the CIT doctrine. Regulations to govern CIT companies are in the process of being developed and once these regulations have been promulgated tenants and shopping centre managers will need to ensure their CIT service providers are compliant with these regulations. Centre Managers at these shopping centres should be provided not only with a list of CIT service providers servicing their centre but also the contact details of operations managers of these CIT companies.

### *ii. Time of collections*

There should be agreed times when CIT collections and delivers are not allowed to occur at these shopping centres. Ideally agreements should be reach with tenants and CIT service providers that collections and deliveries occur after trading hours. Where this is not possible shopping centres need to ensure that these collections and delivery do not occur during peak trading hours. The centre managers need to specify to tenants what periods are considered peak trading (e.g. between 10h00 and 14h30 on weekends) and CIT services not allowed to occur during these times.

### *iii. Routes used for collections*

Ideally CIT companies should not move through public areas of shopping centres and access to their clients should be through secured back entrances or passages. Tenants, CIT companies and shopping centre managers need to agree on designated routes and tenants and centre managers ensure these routes are secured. Once agreed routes have been designated CIT service providers need to stick to these routes.

### *iv. Liaison regarding CIT collections*

CIT service providers need to interface not only with their individual clients but also with centre management. CIT service provides need to be available to attend important meeting called by centre management. While CIT companies service the individual tenants they need to respect the fact that centre management is responsible for the overall security of the centre and mutual co-operation is required in this regard. There is also a need for CIT companies to inform centres when a collection or delivery is about to occur at the shopping centre. The shopping centres then need to place their security on high alert and to be able to communicate any suspicious activity to the CIT Company in advance and vice versa. Centre management need to be able to communicate concerns to CIT service providers and vice versa.

*v. CCTV linked to CIT collections*

The area where the CIT service providers park and alight from their vehicles should be under CCTV surveillance. Passages and routes used by CIT service providers should also be under CCTV surveillance. The standard of the CCTV in these areas should compile to the general CCTV standards developed for shopping centres and retailers.

*vi. CIT vehicles*

Where tenants have a receiving yard, the CIT vehicle should park in the yard and CIT personnel enter via receiving area. The tenants and centre managers then need to ensure that this yard is secure enough to accommodate the CIT vehicles. Where there are not secure receiving yards designated parking points need to be agreed to between the tenants, centre managers and CIT service providers. Once agreed to the CIT service provider must adhere to these designated parking areas.

*vii. Controlled movement standards*

While the CIT doctrine and future regulations proved some guidelines regarding the standards CIT service providers should and will be required to meet. All centre managers need to have access to and understand these standards. However the standards do not address all aspect related to how these CIT service providers are expected to operate at shopping centres. Additional operating standards for shopping centres need to be agreed to by the tenants, CIT companies and shopping centre management. These must include the following:

- There should be no contact between the CIT crewman, sales floor staff of the clients and members of the public during trade.
- The individual crew members often carry two boxes at one time, one box in each hand and this makes them vulnerable to attack by armed robbers. Crew of the CIT service providers should only carry one box while moving through the shopping centre,
- Crew of CIT service providers need to project a calm approach while operating at shopping centres, pushing or shouting at customers using the centre should not be allowed. Running through the centre should also only be allowed during emergency situations.
- All cash boxes used by CIT operators need to be equipped with CPU devises and these devises should be armed while the cash is being moved.

*viii. Cash offices and CIT collections*

The cash offices and area in front of the safe, or the door leading to the cash office, should be secured for the period when the collection will be made by the CIT service provider. Stores should under no circumstances have the keys to the CIT safe on site. Duplicate keys must be kept off site, preferably with the store's bank.

*ix. Training and instructions*

The CIT service provider should provide appropriate information, instruction and training to not only their client but also centre management regarding the risk of robbery, including emergency procedures.

## 7. ATMs at shopping centres

Since mid 2006 there have been an increasing number of incidents where commercial or other explosives are used to tamper with ATMs in an attempt by criminals to access money held in these ATMs. While the majority of these incidents have not occurred at shopping centres between January and July 2007 there were twenty-three reported incidents where commercial explosives were used at ATMs situated at shopping centres. There is also evidence suggesting that the level of violence used by criminals during these ATM attacks is escalating. It is therefore necessary for shopping centres to address how they respond to this form of cash robberies and to develop approaches to minimize the risks associated with this form of crime.

- All shopping centres should receive alert developed by SABRIC on how to detect if an ATM has been tampered with. (a copy is available from the Shopping Centre Security Initiative)
- All security personnel need to be brief on what to look out for and what steps to take when suspicious activity related to ATMs attacks is identified.
- ATMS should not be situated on the outside walls of shopping centres and should be located inside the actual shopping centre.
- The majority of ATM attacks occur between 24h00 and 05h00 (outside shopping centre trading hours) and these high risk times should be dealt with in terms of risk management practices.

## 8. Roles and responsibilities

### 8.1 Cash Management systems at tenant premises

The implementation of cash management system within tenant's premises should be the responsibility of the individual tenants and these tenants need to ensure that they adhere to the guidelines regarding tills, floats, cash office (where applicable) and drop safes. These tenants also need to ensure that they procedures in place and that these procedures are adhered to by all staff. The shopping centre manager and owner companies' role is not to install and implement the guidelines but rather to ensure that the tenants are themselves meeting the required standards and that there are sanctions in place to address tenants not complying with these minimum standards.

### 8.2 Cash hub and associated systems

The responsibility for the development and facilitation of the cash hub and the systems linked to the cash hub is the responsibility of the actual managing and owner companies. The management and control of the cash hub itself should be the responsibility of preferred service providers (banks or CIT service providers) Centre Management should not be responsible for the actual day to day running of the hub and systems linked to the hub. Tenants will then be required to make use of the hub and to follow the guidelines and systems developed as part of this process

However cost for this hub needs to shared jointly by the tenants, shopping centre managing and owner companies and the service providers of the cash hub.

- The managing and owner companies should be responsible for the development of the cash hub itself (building the hub and ensuring it meets the requirements)

- The costs for the trommel or air-tubing needs to be borne jointly by the managing and owner companies and the tenants who will make use of the system
- The cost for the management and control of the cash hub would then be the responsibility of the service provider/s and the tenants who make use of this facility.

### **8.3 Cash movement at smaller shopping centres**

The responsibility for the implementation of guidelines for movement of cash at smaller shopping centres where cash hubs are not implemented is the joint responsibility of the CIT service providers, the tenants and the shopping centre managing and owner companies.

The shopping centre management and owner companies in consultation with the tenants and CIT service would be responsible for ensuring the following:

- There are a set of clear guidelines and rules regarding how CIT service providers are expected to operate at shopping centres, times of day when CIT collections and delivery are allowed to occur and routes to be used by CIT crew.
- The shopping centre security is also responsible for ensuring the routes are secure and parking where necessary is available.
- The installation and maintenance of CCTV at points outside the tenant's premises is also the responsibility of the centre management.
- The centre management is also responsible for ensuring the centre security understands its role and is equipped to play this role.
- Centre management has an obligation to understand standards and guidelines contained in the CIT doctrine, and all subsequent regulations and standards that are developed.
- Centre management have a responsibility to know what CIT service providers are operating and their shopping and to have contact details of the area and national operations managers of these companies.
- The Centre management has a responsibility to ensure that their tenants include all aspects related to standards and guidelines in their service level agreements with the CIT service providers.
- Centre management in consultation with their tenants and the CIT service providers to have emergency and contingency plans in place.
- Centre management should have the right to facilitate and call meeting between tenants and CIT companies to discuss concerns and problems related to cash management and movement of cash.

The tenants as the users of CIT services have a number of responsibilities. These include:

- Ensuring that all aspects of the guidelines adopted are included in their service level agreements

- That agreements related to times when delivery can occur are adhered to by the CIT companies.
- That standards regarding how in store pick ups and delivery occur are in place and that staff adhered to these standards and procedures
- That they attend meeting called by centre management to address problems and solutions to these problems
- That after consultation with centre management and the CIT service provider have a plan in place to address emergencies and that this plan is aligned with CIT and centre management plans.

The CIT service providers have as their clients the tenants who contract their services. However these CIT service providers also need to engage with the shopping centres and their clients. In this regard they have a responsibility to:

- To ensure the Service Level Agreements are adhered to by the company and crew
- To appropriate information, instruction and training to not only their client but also centre management regarding the risk of robbery, including emergency procedures.
- To liaise with centre management and centre security regarding security considerations
- To inform the centre just prior to arrival at the centre
- To adhere to the designated routes and parking areas
- To make collections and deliveries within the agreed timeframes and periods
- To ensure their crew adhere to the guidelines of the shopping centre

The overall objective should in essence to pursue a integrated security management approach.

## 9. Implementation processes

### 9.1 Ensuring the Managing and Owner Companies implement the guidelines

The different managing and owner companies need to ensure that the relevant boards and structures are briefed and accept the policy guidelines. Once these policy guidelines have been accepted budgets need to be secured particularly for the cash hub processes where applicable. The guidelines then need to be implemented through lease agreements and amendments to existing agreements. The applicable guidelines also need to be incorporated into the Standard Operating Procedures for the different centres.

### 9.2 Ensuring Tenants adhere to and implement the guidelines

Once finalized the applicable guidelines need to be included in lease agreement with tenants situated at shopping centres. These tenants also need to include the relevant aspects of the guidelines in the SAL that exist between CIT service providers and the tenants. The Corporate offices of major chain stores and banks also need to ensure that their local branches and franchise adhere to the guidelines and that these guidelines are implemented at local shopping centres.

### **9.3 Ensuring CIT service providers adhere to the guidelines**

The CIT Service Providers should comply with the general agreed guidelines, service level agreements and consulting protocol with the different stakeholders.

### **9.4 Engaging Insurance Companies**

Once the guidelines are finalized the Shopping Centre Security Initiative in conjunction with managing and owner companies, need to engage the insurance industry regarding the standards and the implications of these standards as an insurance requirement.

### **9.5 The role of the BBWG**

The BBWG need to be part of the process of finalizing the standards and once finalized the BBWG leadership forum should also engage some of the relevant companies regarding the implementation of these standards