COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Airports and Ports: the contractor compliance guide.

What Australian law asks of airport and port operators when contractors work on their sites, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; aviation security Regulations as at 1 April 2026 and maritime security Regulations as at 22 January 2026; sources read on 13 and 18 November 2026

Includes
A checklist, an incident card, and an airside and wharf access map

Covers
Airports and seaports, in every state and territory, Victoria named

Scope
Selected contractor WHS, security, and access duties. Workers compensation, dangerous goods, biosecurity, customs, environment law, and transport safety investigation reporting are not covered (page 32)

START HERE

The short version.

What is your airport or port responsible for when contractors work on site, and what should you check before they start?

Most of the work at an airport or a port is done by other businesses: the cleaners, the security officers, the electricians, the lift and baggage-system technicians, and the builders on the next upgrade.

1. **Every contractor's worker is your worker too.** A worker includes a contractor, a subcontractor, and their employees, and the duty reaches workers the business engages, causes to be engaged, or influences or directs (page 5).[1]

2. **A security card says who they are, not that they are ready.** In an airport's secure areas a worker displays a valid ASIC, or properly displays a valid visitor card (VIC) and is supervised by an ASIC holder; in a port's maritime security zones, a valid blue or temporary MSIC, or is escorted. The card follows a background check. It does not show the licence, the induction, or the insurance the job needs (pages 3 and 10 to 13).[8, 14]

3. **Your contractors work inside your security program.** The aviation and maritime security Acts count a contractor that serves the operator as an industry participant. Once given the relevant parts of the operator's program or plan, it must take all reasonable steps to comply (page 15).[9, 15]

4. **Airside and on the wharf, the operator's own rules shape the work.** Airside drivers must be trained, or escorted by an authorised airside driver, most aerodrome works need a method of working plan, and building work on a leased federal airport needs the Airport Building Controller's approval unless it is exempt (pages 15 and 16).[11, 12]

5. **The duty does not move down the chain.** "A duty cannot be transferred to another person," and a contract term that tries to transfer one is void. Our recommendation: check each worker at your gate, whoever employs them (page 6).[1]

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01 THE PRACTICAL TEST

The practical test is what you can show.

An airport or port approves a contractor once, at prequalification. Its people then arrive at the gate every day. The question a regulator asks: who was on site, and what did they hold on the day?



An approved contractor is not a ready worker.

Most checks stop at the company. The law reaches further. A contractor's employees who carry out work for the operator are its workers too (section 7(1)).[1] Before anyone does high risk work that needs a licence, the business directing or allowing it must see written evidence of that licence, provided by the worker (r 85).[2] And in an airport's secure area, the worker also needs a valid ASIC on display, or a valid visitor card (VIC) on display and an ASIC holder supervising them; in a port's maritime security zone, a valid blue or temporary MSIC on display, or an escort displaying one (pages 11 and 12).[8, 14]

ASSESSED BEFORE ENGAGEMENT; REVIEWED ON ANY CHANGE

The contractor

- ✓ Prequalified for the work, safety record included; again on a change of scope, an incident, or a lapse
- ✓ Its workers compensation and public liability cover, and their dates
- ✓ The contract: who checks, who authorises the work, the security program parts it is given, and who reports what

OUR RECOMMENDATION: A STATUS CHECK AT THE GATE, EACH DAY

Each worker, at each site

Terminal | Airside | Wharf

- ✓ Any high risk work licence, of the right class and current, sighted before the work: that one is law[2]
- ✓ In a secure area, a valid ASIC properly displayed, or a valid VIC displayed with an ASIC holder supervising; in a maritime security zone, a valid blue or temporary MSIC properly displayed, or an escort who displays one: also law[8, 14]
- ✓ Inducted to this site, signed in, briefed on the task's controls, and supervised to match the work

Where it usually breaks.

Four common gaps, each one leaving an operator unable to show who was on site and what they held.

The card taken as clearance.
The ASIC or MSIC is looked at; the licence and induction behind the job are not.

Checked by hand.
Each card's and ticket's expiry is typed into a spreadsheet, until a shutdown brings 150 workers to one gate.

The tenant's contractors.
An airline, a retailer, or a stevedore brings its own trades on site, and you never saw their records.

No view across sites.
Nobody can say who is current at every terminal and berth, or who was airside on Tuesday night.

One standard, every gate. One process for every contractor, matched to the role, task, zone, and state. Each gap above makes the verification step of an officer's due diligence harder to show: the model Act says due diligence includes taking reasonable steps to verify the provision and use of the business's health and safety resources and processes (section 27(5)(f)).[1]



02 THE DUTY HOLDERS

Every business on site is a duty holder.

Work health and safety law puts its main duty on a "person conducting a business or undertaking", a PCBU, whether or not it is conducted for profit or gain.[1] The airport or port operator, each airline, tenant, stevedore, and terminal operator, each contractor, and the sole trader on the tools are each one.

> **"WHS duties cannot be contracted out to another party, such as a subcontractor."**
>
> Safe Work Australia, WHS duties in a contractual chain, March 2022[5]

02 THE DUTY HOLDERS

Who the operator owes the duty to.

Three sections of the model Act decide it. Read together, they reach well past the people on the operator's payroll.

Contractors are workers.

A person is a worker if they carry out work in any capacity for a PCBU, including as "a contractor or subcontractor", "an employee of a contractor or subcontractor", or a labour hire employee assigned to the business (section 7(1)).[1]

Engaged or directed is enough.

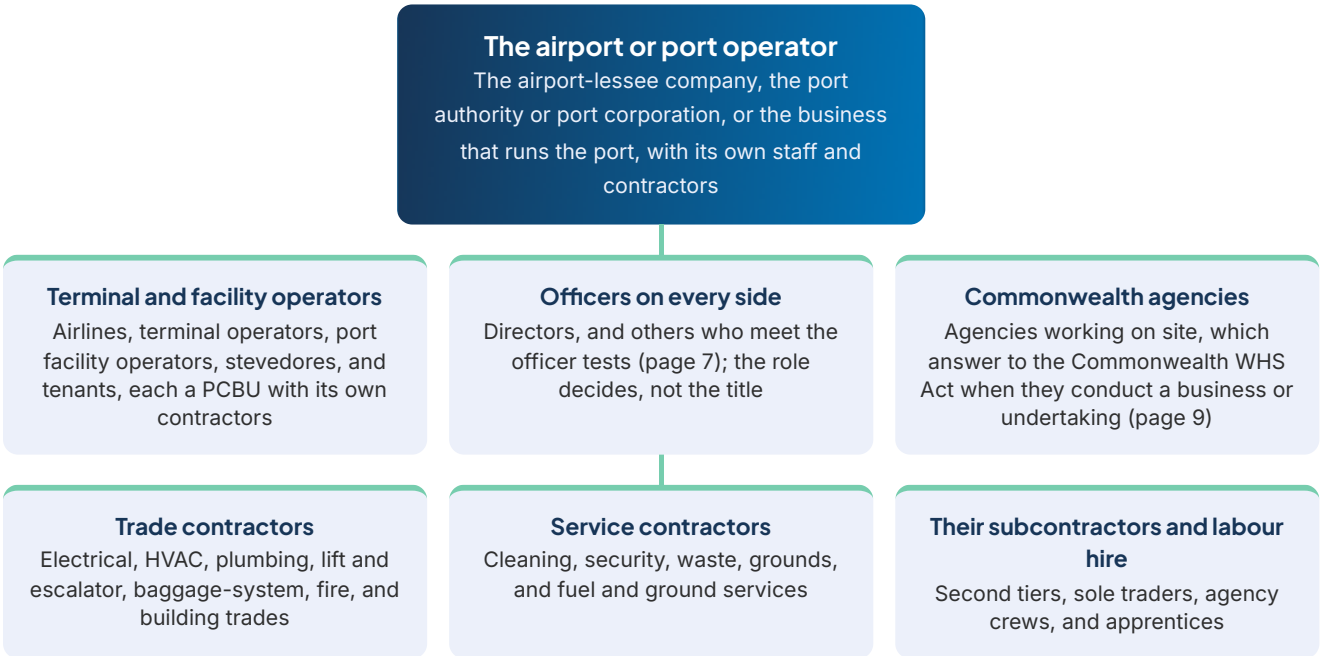
The business must ensure, so far as is reasonably practicable, the health and safety of workers "engaged, or caused to be engaged" by it, and of workers whose activities in carrying out work are "influenced or directed" by it (section 19(1)). That can reach a subcontractor's crew the operator never contracted with.[1]

The site carries its own duty.

Whoever manages or controls a workplace must ensure, so far as is reasonably practicable, that the workplace, the ways in and out, and anything arising from it are without risks to the health and safety of any person (section 20(2)).[1]

Who is on site.

Safe Work Australia notes there can be several levels in a contractual chain.[5] An airport or port adds a second kind of chain: tenants and operators who bring their own contractors onto land you manage. Each needs a place in your checks.

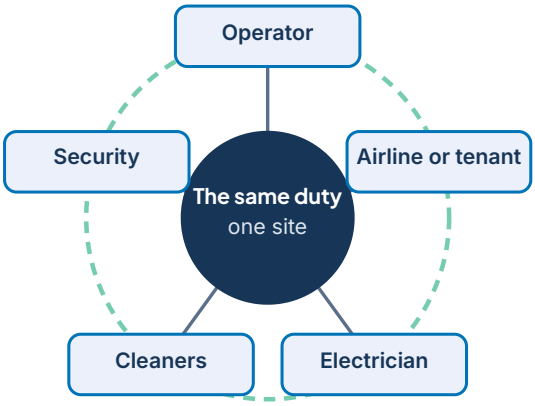


A sole trader is both. Safe Work Australia's example: a self-employed contractor is a PCBU in its own right, with a duty to the workers of any subcontractors it engages, and is also a worker of the business that engaged it.[5] Our recommendation: treat a one-person contractor like any other, with the same checks at the gate.

02 SHARED DUTIES

Shared, but never handed over.

One terminal can hold the operator's staff, an airline's ground crew, a retailer's fit-out team, the electricians, and the cleaners at once. Four rules apply to every one of them.



Consult, cooperate, and coordinate

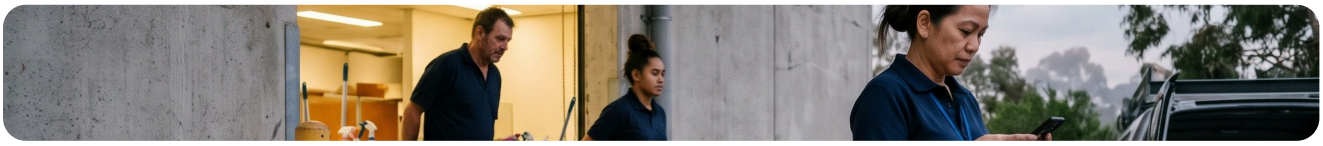
1. **Held at once, each to its own control.** "More than 1 person can concurrently have the same duty" (section 16(1)). Each keeps responsibility for its own duty and must discharge it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1]
2. **Worked together.** Each "must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter" (section 46). Our recommendation: write down who controls which areas, and who checks whom (page 30).[1]
3. **Workers consulted too.** So far as is reasonably practicable, each consults the workers who carry out work for it, contractors' workers included, who are, or are likely to be, directly affected by a health and safety matter (section 47(1)). That means sharing the information, a reasonable chance to raise views and help decide, taking those views into account, and telling workers the outcome in good time; where a health and safety representative represents the affected workers, the consultation must involve that representative (section 48). A coordination meeting between businesses does not meet it. Our recommendation: explain it in language each contractor crew understands.[1]
4. **Never transferred.** "A duty cannot be transferred to another person" (section 14). A contract term that tries to exclude, limit, or modify a duty, or transfer it, is void (section 272).[1]

A tenant's contractor is still on your site.

Whoever manages or controls the workplace keeps its duty for the workplace, the ways in and out, and anything arising from it (section 20(2)), and each business that shares a duty discharges it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1] Our view: an airline's or a retailer's contractor in your terminal is a matter you control in part, so agree in writing who checks them.

In Victoria.

Victoria's OHS Act extends an employer's duties to the independent contractors it engages, and their employees, for matters over which it has control, or would have control but for an agreement that tries to limit or remove it (s 21(3)(b)). It must also ensure, so far as is reasonably practicable, that people other than its employees are not exposed to risks from its undertaking (s 23). Consultation follows its own route there: when it identifies hazards, decides on risk controls, or does the other things s 35 lists, an employer must, so far as is reasonably practicable, consult the employees who are or are likely to be directly affected, including the independent contractors it engages and their employees on matters it controls or would control but for an agreement, and must involve any health and safety representative (s 35).[4]



03 OFFICERS

Due diligence is personal.



Under the model WHS Act, an officer of a PCBU "must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation" (section 27(1)). An officer can be convicted whether or not the business itself is (section 27(4)).[1]

Who is an officer.

Is the operator a company or a public authority?

A company director or secretary is an officer, and so is anyone who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business, who can significantly affect its financial standing, or whose instructions or wishes the directors are accustomed to act on, other than advice given in a professional or business capacity (section 4, taking the Corporations Act meaning). If the operator is a public authority under your jurisdiction's Act, an officer is a person "who makes, or participates in making, decisions that affect the whole, or a substantial part" of its business or undertaking (section 252); for the Crown, section 247 says the same, and a Minister is not one.[1]

Then

Name the officers by what they decide.

At an airport or port operator, that can include the chief executive, the board, and the executive who decides how operations, maintenance, and capital works run: the role decides, not the title. Each airline, stevedore, and contractor has its own.

What an officer risks.

Under the model Act, a Category 1 offence, the most serious of the three categories of health and safety duty offence, is engaging, without reasonable excuse, in conduct that exposes someone to a risk of death or serious injury or illness, with gross negligence or recklessness as to that risk. It carries, for an individual such as an officer, a fine, up to 10 years in prison, or both, and for a body corporate a fine (section 31). Safe Work Australia puts the model fines, for the year from 1 July 2026, at up to AU$2,464,000 for an officer and AU$12,321,000 for a body corporate.[1, 6] It is not the ceiling: the model Act leaves room for an industrial manslaughter offence, with a recommended 20 years for an individual (section 30A). Each jurisdiction sets its own offences and penalties: check yours.[1, 6]

In Victoria.

Victoria's officer liability works differently from section 27. Where a body corporate breaches the OHS Act or Regulations and the breach is attributable to an officer's failure to take reasonable care, the officer commits an offence; the court has regard to what they knew, their ability to make or take part in decisions about the matter, whether others contributed, and any other relevant matter (s 144). It also has its own workplace manslaughter offence, in Part 5A (s 39G). The six due diligence steps on the next page are the model Act's list: use them as a practical framework in Victoria, not as the wording of its statute.[4]

03 OFFICERS

Due diligence includes taking reasonable steps to:

Each card gives one of the six steps the model Act lists, then what it can look like at an airport or port. The last, verify, checks that what (c) to (e) put in place is provided and used.

a

Know.

Acquire and keep up to date knowledge of WHS matters.

At an airport or port: a briefing when the rules change, such as the 2025 model notification changes, or a new security Regulation.

b

Understand.

The operations, and their hazards and risks.

At an airport or port: knowing where works run beside live aircraft, ships, and the public, and which work is done alone at night.

c

Resource.

Make sure the business has, and uses, appropriate resources and processes to eliminate or minimise risks.

At an airport or port: one funded contractor process, used by every terminal and berth, not only the large projects.

d

Hear and respond.

Make sure it has appropriate processes to receive and consider information on incidents, hazards, and risks, and to respond in a timely way.

At an airport or port: contractor and tenant incidents and near misses reported to the same place as its own.

e

Comply.

Make sure it has, and implements, processes for complying with its duties, such as reporting notifiable incidents.

At an airport or port: a written route for who notifies the regulator from each site, agreed with every contractor.

f

Verify.

Verify that the resources and processes in (c) to (e) are provided and used.

At an airport or port: a regular report that shows the checks happened, not only that the policy exists.

The model WHS Act, section 27(5)(a) to (f);[1] the examples are ours.

What the board can ask for.

Four regular reports that show the checks happen, not only that they are planned: evidence for the verify step above. One of them samples the work itself.

- Contractors engaged this month, by site, and how many workers were checked at the gate before their first shift.
- Security cards, licences, and insurance due to lapse in the next 30 days, and any whose status changed (suspended or cancelled), by contractor.
- Airside and wharf works under way, and a sample of permits and method statements compared with the work being done.
- Incidents, which regulator was told, and the corrective actions still open past their due date.

04 WHERE THE LAWS DIFFER

State safety law, Commonwealth security law.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws."[3] The other states and territories each enact their own version. An airport or port adds Commonwealth laws that are the same wherever you are.

Topic	What applies	Where in this guide
Work health and safety	Your state's or territory's WHS law, on the model; in Victoria, the OHS Act 2004.[3, 4] The Commonwealth, and its public authorities, when they conduct a business or undertaking, are under the Commonwealth WHS Act 2011 (s 12), which Comcare administers. So are some private companies that held a licence under the earlier Commonwealth OHS Act (non-Commonwealth licensees), while their transitional period runs (s 12(4) to (6)).[20, 21]	Pages 4 to 8 and 18 to 22
Security cards and programs	The Aviation Transport Security Act 2004 and Regulations 2005, and the Maritime Transport and Offshore Facilities Security Act 2003 and Regulations 2003: Commonwealth law.[8, 9, 14, 15]	Pages 10 to 15
Aerodrome works and airside driving	The aerodrome operator's procedures under the Part 139 (Aerodromes) Manual of Standards 2019.[11]	Page 16
Building on a leased federal airport	The Airports Act 1996 and the Airports (Building Control) Regulations 2025: an approval from the Airport Building Controller.[12, 13]	Page 15
Work on board a ship	A separate Commonwealth law, the Occupational Health and Safety (Maritime Industry) Act 1993, applies to contractors and others working on a prescribed ship engaged in trade between Australia and places outside Australia, or between the states or territories, and on some other ships it lists (s 6). Check which law covers a ship before work on board.[22]	This page only
Critical infrastructure	Security card and transport security compliance do not by themselves meet the Security of Critical Infrastructure Act 2018 (Cth). Asset owners and operators should check whether an airport or port asset is a critical infrastructure asset under it, and what that requires, including cyber security incident reporting. The obligations depend on the asset class: do not assume every airport or port must run the critical infrastructure risk management program. The Cyber and Infrastructure Security Centre's transport guidance separates critical ports and aviation assets from freight assets, each with its own obligations.[25, 26]	This page only

Unless another law is named, WHS section and rule numbers in this guide are the model WHS Act's and Regulations'. Your state's numbers may differ, and Victoria's is a different Act. Check your own state's law, and its regulator's guidance, before you rely on a number. Security Regulation numbers ("r 3.03", "r 6.07J") are the Commonwealth's.[1, 2, 8, 14]





05 SECURITY CARDS

The card proves a check. Permission gets them in.

An ASIC or an MSIC follows a background check under the AusCheck scheme: identity, criminal history, a security assessment, and the right to work.[10, 14] It says nothing about the licence, the induction, or the insurance the task needs.

An ASIC or an MSIC is not an access card. Confirm the relevant authority's permission, the correct zone, card, or escort conditions, and the task authorisation separately (page 15).[8, 14]

> **"an MSIC is issued to identify a person who has been the subject of a background check"**
>
> Maritime Transport and Offshore Facilities Security Regulations 2003, regulation 6.07A(1)[14]

05 SECURITY CARDS

At an airport: the ASIC, and the visitor card.

At a security controlled airport, what a worker must carry depends on where they are. Read each card as a rule your gate, and every escort, has to keep.

Which card, in which zone.

A person in the airside security zone must properly display a valid red ASIC, and in any other secure area a valid red or grey ASIC; a breach is a strict liability offence (r 3.03). The rule does not apply at an airport with no regular public transport flights, and where no screened air service operates it applies only during traffic periods (r 3.03(4), (4A)). An airport-specific card works only at the airport named on it (r 6.03(4)).[8]

Properly displayed, and valid.

On outer clothing, above the waist, at the front or side, with the whole front clearly visible (r 1.04). Valid means not expired, suspended, or cancelled, not altered or defaced, and issued to the person who shows it (r 1.05).[8]

A visitor card means supervision.

A VIC may be issued only to someone who needs to enter for a lawful purpose and will be supervised by an ASIC holder (r 6.38(1)). The ASIC holder must not leave them unsupervised unless another ASIC holder takes over, and an unsupervised VIC holder must leave at once (r 3.09).[8]

Supervising means the ASIC holder, displaying a valid ASIC, escorts or watches the person at all times, or keeps them in an area they can see them leave, with no access to an aircraft in a prescribed air service, its boarding passengers, or what is being loaded on it (r 6.26A(2)).[8]

A visitor card is for a visit, not a roster.

Three rules decide when a contractor's people need their own ASIC, and what their employer owes them.

28 days in 12 months.

A VIC issuer commits an offence by issuing a VIC for an airport to someone who has already held one for that airport for 28 or more days in the previous 12 months (r 6.38E(2)). It does not apply where the person has applied for an ASIC that is not yet issued or refused and the issuer confirms it (r 6.38G); holds an ASIC but does not have it with them, or holds one for another airport (r 6.38H); is covered by a Secretary's exemption (r 6.38F); or in exceptional circumstances, which the issuer records and keeps for 24 months: the Regulation's example is a plumbing or electrical emergency (r 6.38I).[8]

An operational need.

An ASIC is issued only where the person has an operational need, which includes frequent access to a secure area for the airport's or an aircraft's operation, or for their occupation or business; the Regulation's example is a courier or supplier (r 6.01(1), r 6.28(1)). When the need ends, the issuing body cancels the card, and the holder returns it within 1 month (r 6.43(2)(e), r 6.45(1)).[8]

Trained, at a designated airport.

At a designated airport, a contractor company that serves the airport operator or an aircraft operator must ensure its regular employees, those who entered a security restricted area on more than 28 days in the past 12 months, complete airside security awareness training within 3 months of joining the company, and again within 24 months of last completing it (r 3.16H); the company keeps a record of each regular employee's training until 2 years after they stop being a regular employee or leave, whichever is first (r 3.16J(5), (7)(c)).[8]

Our recommendation. Where a contractor's people need frequent access, plan their ASIC applications into the contract, and keep each VIC holder's day count on their record.

05 SECURITY CARDS

At a port: the MSIC, and the escort.

A port's maritime security zones run on the same idea, with their own cards and words.

Blue, or temporary.

A person in a maritime security zone must properly display a valid blue or temporary MSIC; a breach is a strict liability offence. A white MSIC does not meet a requirement to display one (r 6.07J, r 6.07E(3)). [14]

Escorted, to the plan.

A person without one may be in the zone as a visitor, escorted or continuously monitored by an escort displaying a valid blue or temporary MSIC. The escort commits an offence by not following the escort procedures in the participant's security plan (r 6.07I, r 6.07J(2)(a), r 6.07L). [14]

Temporary means forgotten or waiting.

A temporary MSIC can be issued only to a blue MSIC holder whose card is forgotten, lost, stolen, or destroyed, or to an approved applicant still waiting for the card, for no more than 2 months; it is valid only in the zones it shows (r 6.08K, r 6.07D(3)). [14]

A blue MSIC needs an operational need: the person's occupation or business requires unmonitored access to a maritime security zone at least once a year (r 6.07F(1)). [14] Properly displayed means at or above the waist on the front or side of clothing, or on an upper-arm band, with the whole front clearly visible (r 6.07E). [14]

The zones, and who controls them.

There are three kinds of port security zone, and a ship security zone can be set around a ship in port (r 6.20, r 6.80). [14] Ask the port operator for the zone map that covers each contractor's work.

Zone	Who controls it	What a contractor needs to be there
Land-side restricted zone	The port operator, and each port facility operator within its facility, must monitor and control access (r 6.33, r 6.35)	The operator's authority to enter, or to take a vehicle or thing in (r 6.45); a valid MSIC, or an escort
Cleared zone	The port facility operator ensures people and goods are screened and cleared before they enter (r 6.50(2))	Screening and clearance, where required (r 6.60(1))
Water-side restricted zone	The port operator monitors access (r 6.70(3))	The port operator's authority, or that of a port facility operator acting for it (r 6.75(1))
Ship security zone	The port operator monitors access (r 6.95(3))	The port operator's authority (r 6.100(1)) [14]

In each of these zones, a person also properly displays a valid blue or temporary MSIC, or is a visitor with an escort who does, unless an exception applies (r 6.07J). The MSIC rules do not require or allow a participant to keep police and other law enforcement, ambulance, rescue, or fire officers responding to an emergency out of a maritime security zone, and those officers need no MSIC (r 6.07N). [14]



05 SECURITY CARDS

Check the status, not the plastic.

A card can be suspended or cancelled while it is still in the holder's pocket. AusCheck offers ways to check one, and the law puts duties on the holder too.

Look it up.

AusCheck says an employer can confirm an active card from any issuing body in its employer portal, by card number or by name and date of birth, and a facility operator can check in its own portal whether a person holds a valid card and operational need, and that the photo matches the person. [16, 17] Portal access needs a myID of at least Standard strength and RAM authorisation. [17]

Suspended, or cancelled.

An issuing body suspends an ASIC at once when the Secretary directs, and the holder returns it within 7 days; the Secretary may tell the airport operator or the employer (r 6.42B, r 6.44A). [8] An MSIC can be suspended too, and the Secretary may tell the employer or a maritime industry participant; it is cancelled when the operational need ends (r 6.08LF, r 6.08LI(2), r 6.08M). [14]

The holder's own duties.

An ASIC holder reports a lost, stolen, or destroyed card within 7 days and returns a card within 1 month of its expiry or cancellation (r 6.46, r 6.45). An MSIC holder reports a loss within 7 days, returns the card within 30 days of its expiry or cancellation, and within 30 days of knowing they will have no operational need for 12 months (r 6.08R, r 6.08P, r 6.08Q). [8, 14] AusCheck tells employers that when a cardholder employee leaves, "If the employee holds a current MSIC or ASIC, you must cancel their card". [16]

What to keep on each worker's record.

Our recommendation, so the gate checks a status and the record shows the check happened. The law sets the card rules; the form of the record is yours.

The card.
Its type (red or grey ASIC, blue or temporary MSIC), number, expiry date, and the airport or zones it covers.

The last status check.
When it was checked, how, and by whom; checked again on a suspension, an incident, or a change of work.

Visitors.
Each VIC or escorted visit: who supervised, and the days held at that airport in the past 12 months.

Training.
For a regular employee at a designated airport, the airside security awareness training date and when it is next due.





06 THE SECURITY PROGRAM

Your contractors work inside your security program.

The operator of a security controlled airport must have a transport security program, and a port operator and a port facility operator a maritime security plan.[9, 15] A contractor that serves them is an industry participant under the same Act.[9, 15]

> **"the other aviation industry participant must take all reasonable steps to comply with the program."**
>
> Aviation Transport Security Act 2004, section 15(2)[9]

06 THE SECURITY PROGRAM

What the Acts ask of a contractor, and of you.

The aviation and maritime Acts say the same three things. Read them together and the contract has to carry the program.

Contractors are participants.

Both Acts count a contractor that provides services to the operator or to another listed participant (at an airport, also an airline or a tenant; at a port, also a port facility or ship operator) as an industry participant, and an individual engaged under a contract for services as a participant's employee (ATSA s 9; MTOFSA s 10). [9, 15]

Given the relevant parts, they comply.

A participant must not hinder or obstruct another's program or plan. Once given the relevant parts of one that covers its activities, it must take all reasonable steps to comply. A breach is not an offence, but can bring an enforcement order or an injunction (ATSA s 15; MTOFSA s 45). [9, 15]

You follow your own.

An operator that fails to comply with its own program or plan, without a reasonable excuse, commits a strict liability offence (ATSA s 14; MTOFSA s 44). A port operator's plan sets how it consults each participant operating in the port to coordinate security activities (r 3.60). [9, 14, 15]

Our recommendation. Name in each contract which parts of the program or plan the contractor is given, and keep the date it received them.

Entering without authority is an offence.

A person must not enter an airside area or airside security zone without the permission of the responsible aviation industry participant, or take a vehicle in (r 3.17). [8] At a port, a person must not enter or remain in a land-side restricted zone, or take a vehicle or thing in, without the port operator's or port facility operator's authority (r 6.45). [14] The person who walks in commits that offence; the operator still has to monitor and control access (r 6.33, r 6.35). [14] At a designated airport, the participant responsible for a security restricted area must ensure only authorised or exempt people and vehicles can enter it (r 3.16C). [8]

Building on a leased federal airport needs its own approval.

Under the Airports Act, building activities include constructing or altering buildings and structures, earthworks, engineering, electrical, or hydraulic works, and demolition (s 98). Carrying out a building activity on an airport site, or causing or permitting one, without an approval or an exemption is an offence, whether by the airport-lessee company or by anyone else (s 99(1) to (4)). [12]

Who approves.

The Airport Building Controller, as a building permit, a works permit, or a demolition authorisation (ss 10, 21). [13]

The lessee's consent.

An applicant that is not the airport-lessee company gives it a copy of the application; it consents, sets conditions, or refuses within 28 days, and silence is a refusal (s 27). [13]

What is exempt.

Among other listed activities, repairing or altering an existing building by maintenance, cosmetic changes, or fit-out that does not adversely affect its safety or structural soundness or involve its footings (s 11(1)(d)). Before it starts, the person notifies the Controller in writing through its online lodgement facility and, if it is not the lessee, gives the lessee a copy (s 12); its plans and work records are kept for 1 year after completion (s 13). [13]

Section numbers in the three boxes are those of the Airports (Building Control) Regulations 2025. [13]

07 AIRSIDE AND ON THE WHARF

Airside, the aerodrome's rules shape the work.

Aircraft, vehicles, and works share the same pavement. The Part 139 Manual of Standards makes the aerodrome operator set the rules, and contractors work inside them.[11]



Three rules from the Manual of Standards.

Each is the aerodrome operator's duty, and each shapes what a contractor may do airside.

Only trained airside drivers.

The aerodrome operator must ensure no vehicle is driven airside except by a trained airside driver, or under the direct escort of an authorised one (MOS 14.01). At an aerodrome with more than 350,000 air transport passenger movements or 100,000 aircraft movements in a financial year, it runs a driving permit system and verifies every airside driver's competency (MOS 14.02).[11]

Works run to a plan.

The aerodrome manual sets the procedures for planning and safely carrying out aerodrome works (MOS 11.07). Works need a method of working plan, with listed exceptions such as time-limited works or works while the aerodrome is closed, supplied to listed parties, CASA among them, at least 14 days before they start, unless they are unforeseen and urgent (MOS 15.01, 15.02).[11]

A works safety officer, there throughout.

The aerodrome operator appoints a works safety officer to ensure works are carried out safely, present near the works at all times while the aerodrome is open to aircraft; the officer's functions include briefing the works party each day (MOS 15.04, 13.04).[11]

What it means for each contractor.

Our recommendation: six checks around any airside start, kept on the record. Where your aerodrome's procedures say more, follow them, and mark policy apart from the legal minimum.

Driving authority.
Recorded against the worker, apart from the induction, or the authorised driver who escorts them. Checked at sign-in.

The plan, in hand.
Each crew has the method of working plan, or the exception relied on and its alternative controls, and keeps to its limits.

Briefed today.
No airside start until the works safety officer has briefed the crew that day. Record it.

Boundary and contact.
The work boundary is marked and agreed, and airside operations knows when the crew starts, moves, and stops.

Clear before it returns.
Debris cleared, temporary services and barriers removed or handed over, and emergency access kept open.

Handed back by name.
A named person from airside operations accepts the area back before aircraft or vehicles use it again.

07 AIRSIDE AND ON THE WHARF

On the wharf, people and plant are kept apart.

Safe Work Australia's model code for stevedoring covers loading and unloading cargo, stacking and storing on the wharf, and receival and delivery in a terminal. A model code has legal effect only where a jurisdiction approves it: check with your regulator. [18, 19]

A code is evidence.

Under the Commonwealth WHS Act, an approved code is admissible in a prosecution as evidence of whether a duty was met, and a court may rely on it to decide what is reasonably practicable; another way that gives an equivalent or higher standard is allowed (s 275). Check your own state's Act. [20]

Port authorities are named.

The code names port authorities and ship owners among the duty holders, as people with management or control of a workplace where stevedoring is carried out (code 1.2). Where they share a duty for the same matter, each must, so far as is reasonably practicable, consult, cooperate, and coordinate with the others (s 46). [1, 19]

Traffic planned together.

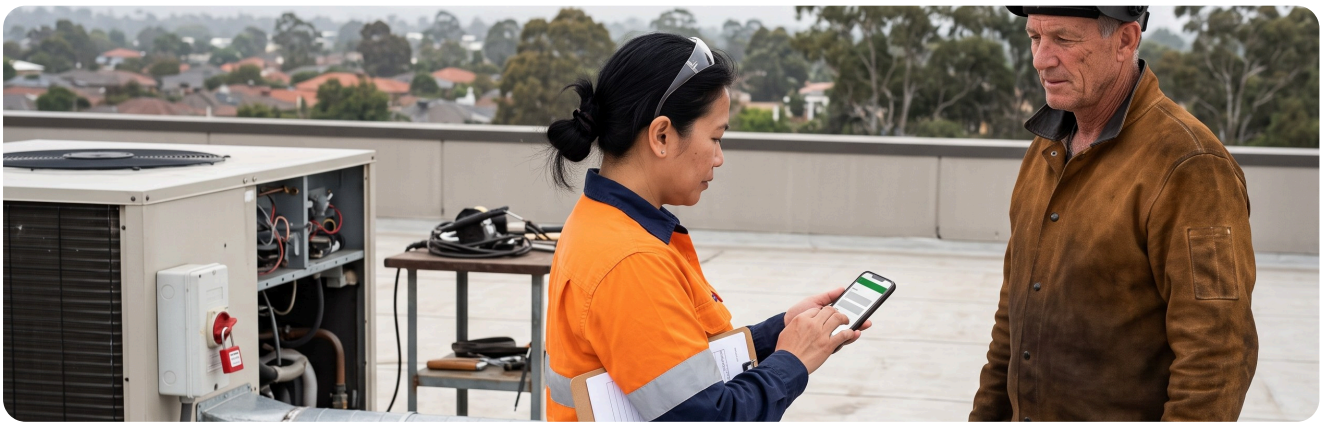
The code says vehicles and powered mobile plant should be separated from pedestrians where reasonably practicable, that traffic planning should consider controlling contractor and visitor movement, and that at a common user facility the common user operator should develop a traffic management plan with the businesses on site (code 5.6). [19] Whoever manages or controls powered mobile plant at a workplace manages the risk of it colliding with any person or thing (r 214), and must ensure it does not collide with pedestrians or other powered mobile plant, with a warning device where a collision is possible (r 215(4), (5)). [2] The code, written in 2016, summarises r 215 as a duty "so far as is reasonably practicable"; the model Regulations' own words carry no such qualifier.

Clear of the load and the lashing.

The code lists exclusion zones that keep workers clear of a suspended load's path, and no working or walking under suspended loads (code 6.1). Workers on or near the vessel are told the exclusion zone protocols, and lashers should never work alone (code 6.2). [19]

What it means for each contractor.

Our recommendation: an electrician fixing a light tower or a cleaner in a terminal amenity block crosses the same wharf as the straddle carriers. Before the first shift, brief every contractor on the terminal's traffic management plan, its walkways, and its exclusion zones, as part of the induction, and record it. Where the work is at the water's edge, over water, or on a vessel, also plan the waterside exposure and the rescue: who can reach a person in the water, with what, and how quickly. When the work ends, hand the berth back to the terminal operator through a named person, with exclusion zones and traffic changes reversed.



08 ON THE DAY

The controls a card will not show.

A current ASIC says nothing about tonight's lone cleaner, the switchboard behind the baggage belt, or the ceiling about to come down.

Control	What it means on site	Status and source
Construction work in the terminal	Work in connection with the construction, alteration, fitting-out, refurbishment, repair, or maintenance of a structure is construction work, and so is installing, testing, or maintaining an essential service in relation to a structure: gas, water, sewerage, telecommunications, electricity, and similar services, or chemicals, fuel, and refrigerant in pipes or lines (r 289(2)(e), r 5). Testing, maintenance, or repair work of a minor nature carried out in connection with a structure is not (r 289(3)(d)). Classify the actual scope first; the general WHS duties, trade licences, and task controls apply either way. Where it involves high risk construction work, such as work near energised electrical installations or where powered mobile plant moves, the business doing it ensures a safe work method statement (SWMS) is prepared before it starts (r 291, r 299). Construction work costing AU$250,000 or more under the model Regulations (AU$350,000 in Victoria and AU$450,000 in South Australia; check your own state's figure) is a construction project with a principal contractor (r 292, r 293). [23, 24]	LAW r 289, r 291, r 292, r 293, r 299 [2]
Alone or after hours	A security officer on night patrol, a cleaner finishing a concourse, or a technician testing a baggage line after the last flight, working out of reach of help, is doing remote or isolated work: the business must provide a system of work that includes effective communication, so help can be called (r 48). Decide who watches the check-ins, and what a missed one triggers.	LAW r 48 [2] GOOD PRACTICE the check-in plan
Aggression and other psychosocial risks	Security officers, cleaners, and crews working among passengers can face aggression, and night shifts and pressure to finish before the first flight are hazards too. These are psychosocial hazards: each business eliminates the risks, or if that is not reasonably practicable minimises them, so far as is reasonably practicable, with regard to how the work is designed, managed, and supported (r 55A, r 55C, r 55D). Our recommendation: ask the crews what they face, agree a way to call for help, and do not rely on training alone.	LAW r 55A, r 55C, r 55D [2] GOOD PRACTICE the controls named
Asbestos in a refurbishment	These rules apply to demolishing or refurbishing a structure or plant built before 31 December 2003, other than minor or routine work (r 447). Before it starts, whoever manages or controls the workplace reviews the asbestos register, revises it if it is inadequate for the work (r 448), and gives the business doing the work a copy, which that business must obtain (r 449, r 450). For a refurbishment of a workplace other than residential premises, asbestos likely to be disturbed is identified and, so far as is reasonably practicable, removed before the work starts (r 456). With no register, the business doing the work does not start until a competent person has inspected for asbestos, and assumes it is present if they are uncertain (r 451). A register is not permission to cut: stop work and isolate the area if suspect material appears.	LAW r 447 to r 451, r 456 [2] GOOD PRACTICE stop and isolate

08 ON THE DAY

Falls, confined spaces, and live electrical work.

Three controls the law orders for itself, whatever the permit says. The law names the duty; the form of the record is yours.

Control	What it means on site	Status and source
Falls	Where a fall from one level to another is reasonably likely to injure, work on the ground or a solid construction so far as is reasonably practicable (r 78). If the risk cannot be eliminated: a fall prevention device, such as edge protection or a working platform; if that is not reasonably practicable, a work positioning system; then fall arrest (r 79). Where fall arrest is used, emergency and rescue procedures for it are set and tested so they work, and the workers who use it, or may start or carry out a rescue, are trained in them (r 80). Our recommendation: confirm the rescue equipment, the access, and the people to carry it out are on site before work starts; a call to 000 is not the whole plan.	LAW r 78, r 79, r 80 [2] GOOD PRACTICE the rescue confirmed before work
Confined spaces	An enclosed or partially enclosed space not designed or intended primarily for people to occupy, at normal atmospheric pressure while anyone is in it, with a risk from its atmosphere, contaminants, or engulfment (r 5). Classify the space and the task: a pit, tank, or service tunnel is not one by default. Before entry: a competent person's written risk assessment (r 66), and the risk from connected plant and services eliminated, or if that is not reasonably practicable minimised, so far as is reasonably practicable, for example by isolating them (r 70). The space is purged or ventilated so far as is reasonably practicable, never with pure or enriched oxygen, and kept at a safe oxygen level while anyone works in it; air-supplied respiratory equipment is the answer only where that is not reasonably practicable and oxygen is below 19.5%, the floor published in the model WHS Regulations of 2025 (r 71). Flammable gas is kept below 5% of its lower explosive limit so far as is reasonably practicable; at 10% or more, or 5% without a continuous detector, workers leave at once, as published in the same model Regulations of 2025 (r 72). Communication and a standby person outside (r 69); signs at each entry (r 68), and no ignition source that could start a fire or explosion (r 73); rescue procedures set and practised (r 74), air-supplied respiratory or other suitable protective equipment for anyone entering to rescue, where the atmosphere or an engulfment calls for it (r 75), and training for those who enter, the standby person, those who may carry out a rescue, and their supervisors (r 76). The written entry permit records them (r 67); it does not replace them. Our recommendation: work from your complete approved confined space procedure; this table is a check, not that procedure.	LAW r 5, rr 66 to 76 [2] GOOD PRACTICE the atmosphere tested by a competent person before and during entry
Live electrical work	The business doing the electrical work does not carry it out on electrical equipment while it is energised, except as the Regulations allow (r 153, r 154). Every business, yours included, must ensure equipment de-energised for the work is not inadvertently re-energised while the work is done (r 156). Our recommendation: isolation by whoever controls that supply, proved safe before work, under a permit.	LAW r 153, r 154, r 156 [2] GOOD PRACTICE the permit and isolation

08 ON THE DAY

Three rules for every contract.

Put them in the contract and the site induction, so nobody has to argue them on the day.

Anyone can stop the work. Restart takes more.

Our rule: anyone who sees work outside what was planned can stop it. That adds to a worker's right to cease work that would expose them to a serious risk from an immediate or imminent exposure to a hazard (s 84), and a trained health and safety representative's power to direct such work to cease, usually after consulting the business (s 85). For high risk construction work not done to its SWMS, the law requires it stopped immediately or as soon as it is safe to do so (r 300(2)). Our rule for restart: once the hazard is dealt with, the plan reviewed, and those affected consulted.[1, 2]

When the job changes.

Our recommendation: treat a lighting repair that becomes a ceiling strip-out as a new job. Assess it again, check for asbestos, review and revise the SWMS where it is high risk construction work (r 302), and check for a building approval or a method of working plan (pages 15 and 16).[2]

When the check cannot be done.

Our recommendation: confirm identity and evidence another way, such as a call to the security control room; without the evidence, safety-critical work does not start, and a screenshot does not prove today's status. The law adds that a call does not replace the licence check: the business must still see written evidence of the licence, provided by the worker, before high risk work (page 3).[2]



09 WHEN SOMETHING GOES WRONG

Rescue first, then notify.

A technician is caught in a conveyor. Call emergency services and activate the site response immediately. Notify the regulator immediately after becoming aware that it is a notifiable incident; do not wait for internal approval. Helping the injured person comes before preserving the site.

A notifiable incident is a death, a serious injury or illness, or a dangerous incident arising from the conduct of the business or undertaking (section 35). The 2025 model changes add a violent incident (section 37A); Safe Work Australia says these changes "only apply if adopted under local WHS laws".[1, 7]

Who reports, and when.

	First	Then	Keep
Model WHS Act The business; sections 38 and 39[1]	**Notify the regulator.** Immediately after becoming aware of it, by the fastest possible means. Whoever manages or controls the site preserves it, so far as is reasonably practicable: where the 2025 change is adopted, until an inspector releases it; under the earlier model wording, until an inspector arrives or directs otherwise.	**Written notice.** If the regulator asks for one, within 48 hours of that request, not of the incident (s 38(4)).	**A record.** For at least 5 years from the day the regulator was told.
Victoria OHS Act 2004 (Vic) ss 38 and 39[4]	**Notify WorkSafe.** The employer or self-employed person with management and control of the workplace where the incident happened, immediately after becoming aware of it; the site is not disturbed until an inspector arrives or directs otherwise, except to protect health or safety or help an injured person (s 39).	**Written record.** Within 48 hours after being required to notify WorkSafe, so without waiting to be asked (s 38(3)).	**A copy.** For at least 5 years.

Where the 2025 changes are adopted, a work-related suicide or attempted suicide is notified immediately, and a worker's absence of 15 or more consecutive days from a work-related injury or illness within 14 days of becoming aware of it (ss 35A, 35B, 38(1)), and notice is needed only once for the same event (s 38(1A)), so one agreed notice is fine; each business with the duty stays responsible for making sure it is given (s 14). The site may still be disturbed to help an injured person or make it safe (s 39(3)).[1, 7]

09 WHEN SOMETHING GOES WRONG

Put the route on one card for each site.

Put it in the security control room, the site office, and the induction, and fill in the right-hand column for each terminal, berth, or yard, in your own words and with real names and numbers.

On the card	What it says	This site
Emergency and rescue	000, first aiders, the evacuation point, who meets responders and takes them airside or onto the wharf, and for a confined space or work at height, the rescue the permit names, and who runs it. At a port, the MSIC rules do not allow emergency responders to be kept out of a zone (page 12).[14]	
Who notifies	Who decides, their backup, and each contractor's notifier; where the 2025 change is adopted, the notifier and the site's controller tell each other at once, so far as is reasonably practicable (s 39A); the incident number, when the regulator was told, and its reference	
Other notification routes	Who decides, and who makes, each other notification the event may trigger. This guide covers WHS notification only: it does not cover dangerous goods, biosecurity, customs, environment, or transport safety investigation reporting, so add the routes that apply at your site.	
A security event	Our recommendation: the route for a lost card, an unescorted visitor, or a breach, as your program or plan sets it, and who tells the operator.	
Contacts	The duty manager, the security control room, each contractor's notifier, and the regulator's notification line, each with a number and a backup.	

10 A WORKED EXAMPLE

A baggage hall upgrade with five contractors.

At a leased federal airport, the airport-lessee company replaces the conveyors in its baggage hall over 10 weeks, under a AU$1.8 million contract with a baggage-system contractor. Electricians, a lift contractor, cleaners, and security work alongside. Numbers below are the model's; in your state, adapt them to that state's law (page 9).

What is live	Why	What gets checked and kept
The approval	Engineering and electrical works on an airport site are building activities: without an approval from the Airport Building Controller, or an exemption, carrying one out is an offence (s 98, s 99).[12] If the contractor applies, the airport-lessee company's consent is needed before the Controller can approve it (Building Control Regulations s 22, s 27).[13]	The permit, its conditions, and the consent
The principal contractor	At AU$1.8 million this is a construction project. The lessee commissions it, so it is the principal contractor unless it engages the baggage-system contractor as one and authorises it to manage or control the workplace and to discharge the principal contractor's duties (r 292, r 293).[2]	The appointment in the contract, with the area and dates; the WHS management plan
The cards	Where the hall is a secure area, each worker properly displays a valid ASIC (red if the hall is in the airside security zone, red or grey otherwise), or a valid VIC with an ASIC holder supervising; a VIC for that airport is not issued to someone who has held one there for 28 days in 12 months, unless an exception applies, such as a pending ASIC application (r 3.03, r 3.09, r 6.38E to r 6.38I).[8]	Card type, number, and expiry for each worker; each VIC holder's supervisor and day count
The program	The contractors are aviation industry participants: the lessee gives each the parts of its transport security program that cover its work, and each takes all reasonable steps to comply (ATSA s 9, s 15).[9]	The parts given, to whom, and when
The high risk work	Work near energised electrical installations and where powered mobile plant moves is high risk construction work, so each crew has a SWMS before it starts (r 291, r 299); the business doing the electrical work does none on energised equipment, except as the Regulations allow (r 153, r 154).[2]	Each SWMS, read against the hall and the crew; the isolation permits
After hours	The cut-over runs overnight between the last and first flights, and cleaners and a security officer work the hall alone. Remote or isolated work needs a system of work with effective communication (r 48).[2]	The check-in plan, and who answers a missed check-in
The handback	Our recommendation: before the new conveyors return to service, a named person for the lessee accepts the reinstatement and the testing: isolations removed, guards refitted, the system tested with the electrical contractor's sign-off, debris cleared, and emergency access restored.	Who accepted it, when, and the test records

On paper, each of these lives in a different folder. Joined up, the lessee sees on Monday who worked in the hall each night, what card and licence each held, which SWMS were read against the work, and what is still open.

11 THE RECORD

What to hold for every contractor.

Four levels: the company, the worker, the site, and the visit (page 25). Each row says whether the law, a regulator, a contract, or good practice asks for it; WHS numbers are the model's unless named (page 9).

LAW Act, Regulations, or Rules POLICY policy or contract terms
REGULATOR guidance GOOD PRACTICE our recommended way; your contract, policy, or the law may still require it

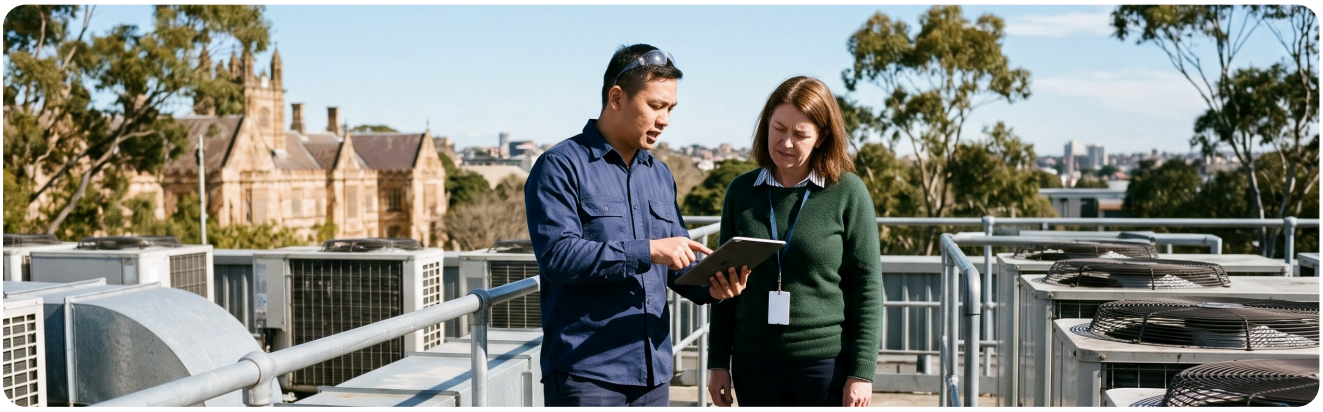
Level	What to hold	Status and source
The company	The prequalification: its safety record and capability for the work, its safety system, and how its performance will be monitored	GOOD PRACTICE prequalification
	Workers compensation: its own policy or self-insurance under its state or territory scheme; public liability and any other cover the contract asks for, with expiry dates	LAW each employer's state or territory scheme (not covered in this guide) POLICY the contract's insurance terms
	The parts of your transport security program or maritime security plan it was given, and when; once given, it must take all reasonable steps to comply	LAW ATSA s 15; MTOFSA s 45 [9, 15] GOOD PRACTICE the record of what was given
The worker	The security card, where the work or route enters a secure area or maritime security zone: type, number, expiry, and the airport or zones it covers, with the last status check; or, for a visitor, the VIC or escort, who supervised, and the VIC days held at that airport	LAW display, supervision, and the 28 days: pages 11 and 12 [8, 14] GOOD PRACTICE the record and status check
	Written evidence of any high risk work licence, provided by the worker and sighted before the work, and a record kept for at least 1 year after the high risk work; its class and current status checked, and reviewed again on a suspension, an incident, or a change of task	LAW r 85(1) and (4) [2] GOOD PRACTICE the status check and reviews
	Airside driving authority, where the worker drives airside (or the authorised driver who escorts them), recorded apart from the induction; airside security awareness training, for a regular employee at a designated airport	LAW MOS 14.01; r 3.16H, and its training record, r 3.16J(5) [8, 11] GOOD PRACTICE the record of driving authority
	Any licence your state requires for the trade, such as an electrical licence; the site induction, the site's rules, and the task briefing, in a way each worker can readily understand	LAW your state's licensing law; training suited to the work and its risks, r 39 [2] GOOD PRACTICE the induction record

11 THE RECORD, CONTINUED

The site and the visit.

What each terminal, berth, or yard holds, and what each day adds to the record.

Level	What to hold	Status and source
The site	The zone map for the contractor's work, and who controls access to each zone; at a port, who authorises entry to land-side restricted zones	LAW pages 11, 12, and 15 [8, 14] GOOD PRACTICE the map, in the contract
	For a building activity on a leased federal airport: the Airport Building Controller's approval, or the exemption relied on and its notice to the Controller (Building Control Regulations s 12); for aerodrome works: the method of working plan, or the exception relied on and its alternative controls, and the works safety officer	LAW pages 15 and 16 [11, 12]
	A SWMS for each kind of high risk construction work, received before the work starts; the asbestos register reviewed and given before a refurbishment	LAW page 18 [2] GOOD PRACTICE reading it against the work
	On the wharf: the terminal's traffic management plan and exclusion zones, and who briefed each contractor on them	REGULATOR the stevedoring code, where approved [18, 19] LAW powered mobile plant, r 215 [2]
The visit	Sign in and out, by site and zone, so you know who is on site and when	GOOD PRACTICE sign-in at the gate
	Consultation with the other businesses on site, tenants and terminal operators included, and with affected workers and any health and safety representative: what was shared, the views raised, and the outcome they were told	LAW s 46, s 47, s 48 [1]
	Confined space assessments and permits, isolation permits, and the check-ins for anyone alone or after hours, with who answered a missed one	LAW pages 18 and 19 [2] GOOD PRACTICE the permit numbers and the log
	Psychosocial risks the crews raised and the controls agreed; notifiable incidents, when the regulator was told, and its reference	LAW page 18; s 38(7) [1, 2] GOOD PRACTICE the controls named



11 THE RECORD, CONTINUED

How long to keep each record.

The legal minimums differ by record, and an incident extends several. These are floors, not destruction dates: keep each for the longest of the minimum, your contract, and any hold for an incident or claim.

Record	Minimum (model WHS laws, unless another law is named)	Kept by
High risk work licence evidence	At least 1 year after the high risk work (r 85(4)) [2]	The business that directed or allowed the work
Safe work method statement	Until the high risk construction work is completed; at least 2 years after a connected notifiable incident (r 303) [2]	The business doing the work
Confined space assessment and permit	Assessment: at least 28 days after the work; permit: until the work is completed; each at least 2 years after a connected notifiable incident (r 77) [2]	The business that prepared or issued it
Notifiable incident record	At least 5 years from the day the regulator was told (s 38(7)) [1]	Each business with the duty to notify
VIC issued past 28 days	The record of the exceptional circumstances: 24 months (Aviation Transport Security Regulations r 6.38I(2)) [8]	The VIC issuer
Temporary MSIC register	Kept for auditing; the Regulations set no period (Maritime Transport and Offshore Facilities Security Regulations r 6.08K(1)(c)) [14]	The participant that issues them
Airside security awareness training record	At least 2 years after the worker stops being a regular employee or leaves, whichever is first (Aviation Transport Security Regulations r 3.16J(7)(c)) [8]	The participant that must train them
Plans and work records for an exempt building activity	1 year from the day it is completed (Airports (Building Control) Regulations s 13) [13]	The person who carries it out, or the person it acts for, if that person agrees to keep them

Linked, not one open file.

Security cards, licences, and incident records hold personal information about other businesses' workers. Our recommendation: link the records rather than pool them; the gate sees a status, not the document; each team sees what its role needs; access is logged; and do not assume a privacy exemption for your own employees' records covers your contractors' workers. When a record has served its purpose, review it: destroy it securely or de-identify it, unless a legal retention period or a hold applies, and where a status record is enough, keep that instead of copies of sensitive documents. Where the Privacy Act 1988 (Cth) applies to you, Australian Privacy Principle 11 requires reasonable steps to destroy or de-identify personal information you no longer need for any purpose the Principles allow, unless an Australian law or a court or tribunal order requires you to keep it, or it is in a Commonwealth record (APP 11.2). [27]



11 CHECKLIST

Before a contractor starts.

Run it for each site and each contract, and tick a line only when you can point to the evidence. WHS numbers are the model's unless another law is named; in Victoria, read its own OHS Act and Regulations (page 9).

	Check	Owner	Date and evidence ref.
	Settle the roles		
☐	We know which WHS law and regulator apply to the site and to each party, and whether any work is on board a ship covered by another law. **Law, page 9** **Good practice** each party's law, confirmed		
☐	Who controls each area is written down: ours, each tenant's, each terminal operator's, and who checks their contractors. **Law, page 6** **Good practice** in writing		
☐	Each job's scope is classified: construction work or not, high risk construction work or not. Where it is a construction project under your state's law, the principal contractor is named in writing (page 18). **Law, page 18** **Good practice (in writing)**		
	At prequalification and contract		
☐	The contract names the safety requirements, the licences and tickets the work needs, the security cards each zone needs, and who notifies the regulator. **Good practice** the contract terms		
☐	The contractor has been given the parts of our transport security program or maritime security plan that cover its work, and the date is recorded. **Law, page 15 (its duty once given)** **Good practice (the record)** page 15		
☐	Its workers compensation cover, and the public liability and other cover the contract asks for, are on file with dates; and so are those of any tier below it. **Policy** the contract's insurance terms **Good practice** check your state's scheme		
	Before the first shift		
☐	Each worker going into a secure area or maritime security zone displays the right valid card, or displays a valid VIC with a named ASIC holder supervising, or has an escort displaying a valid MSIC; VIC day counts are within 28 days in 12 months at that airport, unless an exception applies (page 11). **Law, pages 11 and 12** the card record		
☐	Building activity on a leased federal airport has its approval or exemption. Aerodrome works have a method of working plan, approved and communicated, or the exception relied on is documented with its alternative controls. Airside drivers are trained, and hold the aerodrome's airside driving permit where it runs a permit system, or are under the direct escort of a driver the aerodrome operator authorises to escort. **Law, pages 15 and 16** **Policy, where your operator's rules are stricter** the approval and plan		
☐	A SWMS for each kind of high risk construction work is received before the work starts, and read against the site and the crew; the asbestos register is reviewed and given before a refurbishment. **Law, page 18**		
☐	Each worker, of every tier, has completed the site induction, including the airside rules or the wharf's traffic plan and exclusion zones. **Law, r 39 (training suited to the work)** **Good practice (the induction)** pages 16 and 17		

11 CHECKLIST, CONTINUED

On the day.

Daily checks at the gate and on the job.

	Check	Owner	Date and evidence ref.
	At the gate, each day		
☐	Every worker is signed in and out by site and zone. Where the work or route enters a secure area or maritime security zone, each worker's security card status was checked, not only sighted. Any high risk work licence is of the right class, current and not suspended, and sighted before the work. **Law, pages 11, 12, and 24** **Good practice** the status check		
☐	Where a visitor's route enters a secure area or maritime security zone, they display a valid VIC with a named ASIC holder supervising, or have an escort displaying a valid MSIC; a VIC holder leaves at once if supervision ends. Public terminal areas outside any secure area are the site's own policy, not these card rules. **Law, r 3.09, r 6.07L** the visitor log		
☐	Where a check could not be done, the fallback was used, safety-critical work did not start without the evidence, and the decision recorded. **Good practice, page 20** who decided, and why		
	On the job		
☐	Airside crews are briefed by the works safety officer that day, and work within the method of working plan or the documented exception's alternative controls; on the wharf, crews keep to the walkways and exclusion zones. **Law, MOS 15.04 (the officer)** **Regulator, the stevedoring code** pages 16 and 17		
☐	High risk construction work matches its SWMS; work that does not is stopped immediately or as soon as it is safe to do so, and resumes only in line with it. **Law, r 300** the walk, dated		
☐	Each space is checked against the r 5 definition, and a confined space is entered only by written permit, after the written assessment, isolation, signs, no ignition source, a standby person, a safe atmosphere kept, trained entrants, standby persons, rescuers, and supervisors, and rescue procedures set and practised. **Law, page 19** **Good practice (testing the air)** permit numbers		
☐	Where fall arrest will be used, the rescue procedure is set and tested, the workers are trained in it, and the rescue equipment, access, and people are on site before the work starts. **Law, page 19** **Good practice (on site)**		
☐	A worker alone or after hours has a way to call for help that works there, someone watches the check-ins, and a missed one is escalated. **Law, page 18** **Good practice** the check-in plan		
☐	Psychosocial risks raised with the crews, and the controls agreed. **Law, page 18** **Good practice, page 18** the controls named		
☐	Affected workers, and any health and safety representative, were given the information, a chance to raise views, and the outcome, in language each crew understands; in Victoria, by its own route. **Law, s 47, s 48; Vic s 35, page 6** what was shared, and the outcome		

11 CHECKLIST, CONTINUED

Handback and incidents.

The close of the job, the incident route, and the standing checks for the officers.

	Check	Owner	Date and evidence ref.
	At handback		
☐	The work was handed back through a named person who accepted the reinstatement and the testing before the area, plant, or system returned to use; debris, temporary services, and barriers were dealt with, and emergency access stayed open. **Good practice** who accepted it, and when		
	If something goes wrong, and standing		
☐	The site's incident card is current, and each contractor knows who notifies the regulator and how, where a security event goes, and who makes any other notification that applies. **Law, s 38, pages 21 and 22** **Good practice** the card, reviewed		
☐	A card holder's lost card, suspension, or end of operational need reaches us, and the card's status is checked again. **Law, page 13 (the holder's and issuer's duties)** **Good practice (our check)**		
☐	Officers receive a regular report that verifies the checks happen: overdue actions, and a sample of permits checked against the work done. **Good practice; taking reasonable steps to verify is part of an officer's due diligence, s 27(5)(f)** the report, dated		
☐	Every action raised by these checks has an owner and a due date, and is closed only when someone has seen that it was done. **Good practice** the action, its owner, and the evidence it closed		
☐	Personal information in these records is reviewed, and destroyed or de-identified when it is no longer needed, unless a legal retention period or a hold applies. **Law, APP 11, where the Privacy Act applies** **Good practice** the review, dated		

11 TEMPLATE

The airside and wharf access map.

One row per contractor, at every tier; the first row is an example. It shows, before anyone reaches the gate, who engaged whom, where they will work, and what each must hold to start. In the zone column, name the zone and any exception relied on (page 11).

Contractor and tier	Engaged by	Work and zone	Card or escort	Licences, permits, and approvals	Program parts given	Who notifies after hours; row owner and review date
Example: Northline Electrical, tier 1	*The airport operator, under contract 22, from 03/03/2026*	*Lighting upgrade in the baggage hall, a secure area (red or grey ASIC; no exception relied on); nights*	*4 red ASICs, checked 02/03/2026; 1 apprentice whose ASIC application is lodged and confirmed by the issuer, on a displayed VIC supervised by the leading hand until the card arrives*	*Electrical licences sighted; SWMS for work near energised installations; an isolation permit each shift; the building approval for the works*	*The program parts for the baggage hall, given 24/02/2026*	*Leading hand tells the duty manager at once; where s 38(1A) is adopted, the operator gives the one notice and Northline confirms it was given; otherwise each notifies. Row owner: the operator's contracts manager; review 03/06/2026*

How to keep the map true.

A map nobody keeps current is worse than none, because the gate trusts it. Three habits keep it right.

Start it at the contract.

A row is opened when the contract is signed, not when the crew turns up, and each contractor tells you before it engages a tier below it. Ask tenants and terminal operators for theirs.

Review it on any change.

A new tier, a changed zone, a lapsed or suspended card, or an incident changes the row. Give each row a review date, and keep the site's incident card (page 22) with it.

Keep it where the gate can see it.

The map is only useful if the gate, the security control room, and the operations manager can all see it when a crew arrives.

12 ONE STANDARD AT EVERY GATE

The same standard at every gate.

Every check in this guide has to work at the busiest morning peak, and on the quietest night shift between flights or ships.

Questions to ask about how you manage it today.

1. If a regulator asked who was airside or on the wharf last Tuesday night, and what each worker held, how long would the answer take?
2. Do you know every contractor working on your sites, including the ones your tenants and terminal operators engaged?
3. When a security card, licence, or insurance certificate lapses, or a card is suspended, who finds out before the next shift?
4. Which contractors' people are close to the 28-day visitor card limit at your airport, which exception any of them relies on, and who is counting?
5. Has each contractor been given the parts of your security program or plan that cover its work, and can you show when?
6. Does every airside and wharf job have its approvals in place before the crew arrives: the building approval, the method of working plan or its documented exception, the traffic plan?
7. Have you agreed with every contractor who reports to the regulator, and is it on each site's card?
8. How many hours a week do your operations and security teams spend chasing paperwork?

What to look for in a system.

Seven capabilities that keep these checks working at every gate.

- **One record beside every card.** Each worker's ASIC or MSIC, with its type and expiry, on the same record as their induction and licence, linked to the contractor's insurance and approval record.
- **Register once, review on change.** A contractor registers once and uploads its insurances, licences, and safety documents; its approval is reviewed when scope, risk, or evidence changes.
- **Expiry tracked for you.** Reminders and re-approvals go out before anything runs out. A reminder is not a live card status: confirm how card checks are done.
- **A gate that checks.** A QR code or tablet at the terminal gate, the airside checkpoint, or the yard, the record checked before anyone signs in, and a live list of who is on site, after hours too.
- **Driving authority, kept apart.** Airside or wharf driving authorisation recorded against the worker, separate from the induction, and checked at sign-in.
- **Permits with the method behind them.** Hot work, confined space, heights, and exclusion-zone permits on a phone, the SWMS read before approval, routed to your authoriser.
- **A record for the audit.** One searchable record per terminal, berth, or building, with scheduled reports.

START SMALL

Start with one terminal or berth.

Take one site, fill in its access map on page 30, and run the checklist on pages 27 to 29 against its contractors. Close the gaps first: card status checked, worker ready, approvals in place. Then ask anyone offering a system to show each point above on your own site.

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Every source, with the date it was read.

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This guide is general information, not legal advice. It summarises the model Work Health and Safety Act and Regulations published by Safe Work Australia (as at 5 December 2025), Victoria's Occupational Health and Safety Act 2004, the Commonwealth's aviation and maritime transport security laws, the Part 139 (Aerodromes) Manual of Standards, the Airports Act's building controls, and regulator guidance, as read on the dates above. Each jurisdiction enacts its own WHS law, so text and numbering can differ. It does not cover workers compensation, dangerous goods, biosecurity, customs, or environment law, or transport safety investigation reporting. For a decision about your own sites and contractors, read the law that applies to you and take legal advice. It is a contractor management guide, not a technical or security manual.

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