COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Data Centres: the contractor compliance guide.

What Australian law asks of data centre owners and operators when contractors work in their facilities, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; the Security of Critical Infrastructure Act 2018 as compiled at 4 June 2026, and its risk management program Rules at 10 June 2026; Queensland's Electrical Safety Regulation 2026 at 1 September 2026; Victoria's Electricity Safety Act at 8 September 2026; sources read on 14, 17, and 18 November 2026

Includes
A checklist, a worked example, and a contractor access map

Covers
Owners, operators, colocation providers, developers, and principal contractors; WHS law in every state and territory, Victoria named; electrical licensing in Queensland, Victoria, Western Australia, South Australia, Tasmania, and NSW (from the regulators' own pages); the Commonwealth critical infrastructure and ozone laws

START HERE

The short version.

What is your business responsible for when contractors work in your data centres, and what should you check before they start?

Owners, operators, and developers bring in other businesses to build, fit out, commission, and keep a facility running. The electrician, the cooling technician, and the night cleaner all work under your duty.

1 **Engaging a contractor does not hand over the duty.** A worker includes a contractor and a contractor's employee, and the duty, so far as is reasonably practicable, reaches workers the business engages, causes to be engaged, or influences or directs (page 5).[1]

2 **Critical infrastructure law can reach your contractors.** If your facility is a critical data storage or processing asset, and you do not hold strategic-level certification under the Commonwealth's hosting certification framework for the services it provides, your risk management program must have a process to identify critical workers, who can be contractors or subcontractors, and to let them reach critical components only once assessed as suitable (pages 10 to 12).[5, 6]

3 **No live electrical work by default.** Under the model Regulations, electrical work is not carried out on energised equipment except in four cases, and the business doing it authorises live work only after consulting whoever manages or controls the workplace. Queensland, Victoria, and Western Australia use their own rules (pages 13 to 15).[2, 11, 13, 18]

4 **Cooling and gas suppression technicians may need their own licence.** Under Commonwealth law, on equipment that uses a CFC, HCFC, HFC, PFC, or halon refrigerant, anything done with the refrigerant, or a component, that risks refrigerant being emitted needs a refrigerant handling licence covering the work; handling a scheduled extinguishing agent, such as HFC-227ea or halon, for fire protection equipment needs an extinguishing agent handling licence (page 16).[8, 9]

5 **Approved once is not checked today.** A contractor approved for the panel says little about the technician at the hall door tonight. Our recommendation: check each worker's licence, ticket, and competence for the task, at the facility, before the work; for a high risk work licence, seeing it first is the law under the model Regulations (page 3).[2]

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01 THE PRACTICAL TEST

The practical test is what you can show.

A contractor is approved once. Its technicians then arrive at halls the panel never sees, often at night. The question a regulator asks: who was in the facility, 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 business are its workers too, for WHS purposes (section 7(1)),[1] and before anyone does high risk work that needs a licence, the business directing or allowing it must see written evidence of that licence.[2] A contractor on the panel since 2023 says little about the technician it sends tonight.

OUR RECOMMENDATION: ASSESSED ONCE, REVIEWED ON ANY CHANGE

The company

- ✓ Assessed for the panel or the job, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Its electrical contractor licence or registration where its state requires one, with status, apart from each worker's licence
- ✓ Its workers compensation and public liability cover, and their dates (page 21)

OUR RECOMMENDATION: A STATUS CHECK AT EACH FACILITY, EACH VISIT

Each worker, at each facility

Loading dock | Data hall | Plant room

- ✓ Any high risk work licence, of the right class and current, sighted before the work: that one is law[2]
- ✓ The licence the trade needs, such as an electrical or refrigerant handling licence, and the tickets the job needs
- ✓ Inducted to this facility, signed in, authorised for the zone and the task, escorted where your rules say

Where it usually breaks.

Four common gaps, each one leaving an operator unable to show who was in the facility and what they held.

A licence, not the right one.
An electrical licence is on file, but nobody checked its class, conditions, or that it is current.

Checked by hand.
Dates live in a spreadsheet, until a fit-out brings 40 trades in a week.

Night shifts and remote halls.
A lightly staffed facility has a security desk, and a visitor book there says nothing about the permit for the work.

No view across the portfolio.
Nobody can say which contractors are current at every facility, or who had access to which hall last month.

One standard, every facility. One process for every contractor, requirements matched to the facility, the zone, the task, and the 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

Engaging a contractor does not transfer your duty.

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. An owner, an operator, a colocation provider, and a principal contractor are each one.[1] The duty reaches the night cleaner as surely as the high voltage crew.

> **"A duty cannot be transferred to another person."**
>
> Model Work Health and Safety Act, section 14[1]

02 THE DUTY HOLDERS

Who the business owes the duty to.

Three sections of the model Act decide it. Read together, they reach well past the people on your own 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" or "an employee of a contractor or subcontractor" (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 vendor's subcontracted field engineer you never contracted with. [1]

Each facility 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 in a data centre.

The business that engages sits at the top. Everyone below it brings people into the facility, and each needs a place in your checks.

The business that engages
The PCBU: an owner, an operator, a colocation or cloud provider, a developer, or a principal contractor on a build or fit-out

Facilities, security, and delivery
Internal teams, or external providers with their own duties: name the contracting business and who manages each area

The executive
Officers: the directors and company secretary, and anyone else who meets the officer tests (page 7); the role decides, not the title

Other duty holders on site
Whoever manages or controls the workplace, a customer fitting out its own cage, and any principal contractor on a construction project

Contractors
Electricians and high voltage crews, mechanical and HVAC technicians, fire and gas suppression trades, cabling crews, security officers, cleaners, and fit-out crews

Subcontractors and labour hire
The trades' own subcontractors, agency labour, and apprentices

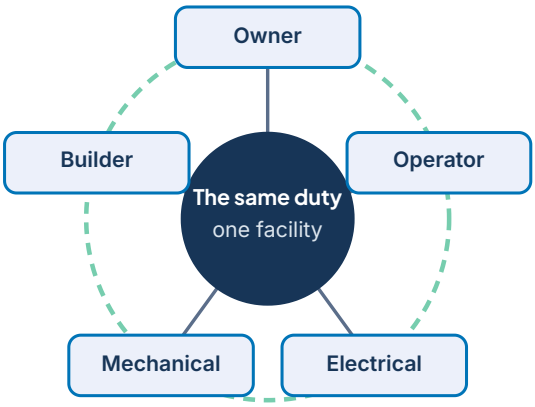
Specialists brought in for one job
Vendor field engineers, commissioning agents, inspectors and auditors, and the generator or UPS maker's technician

A one-night job is not an exception. A vendor engineer in for one change window is owed the same duty as any other worker by the business that engages it, or influences or directs its work. Our recommendation: check every visiting worker against the same record, at sign-in. Building, fitting out, or maintaining a hall? Construction work includes fitting out, commissioning, repairing, and maintaining a structure, and installing, testing, or maintaining an essential service such as electricity, or fuel or refrigerant in pipes or lines; testing, maintenance, or repair of a minor nature is not (rr 5, 289). A project costing AU$250,000 or more has one principal contractor at a time (rr 292, 293); in Victoria, the principal contractor duties apply to a project costing AU$350,000 or more (OHS Regulations 2017 (Vic) r 332); in South Australia, AU$450,000 or more (Work Health and Safety Regulations 2012 (SA) r 292); other states may differ. No worker does construction work without general construction induction training (r 317). [2, 29, 31, 39]

02 SHARED DUTIES

Shared, but never handed over.

A new hall puts the owner, the builder as principal contractor, the electrical and mechanical trades, and the operator taking it over on one job. 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).[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, and involves their health and safety representative where they have one (sections 47 and 48(2)).[1] Our view: a meeting between businesses does not meet it.
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]

> **"WHS duties cannot be contracted out to another party, such as a subcontractor."**
> Safe Work Australia, WHS duties in a contractual chain, fact sheet published 5 April 2022[24]

In Victoria.

In Victoria's OHS Act, the consult, cooperate, and coordinate duty between duty holders (s 35A) applies where a worker is a labour hire worker. The employer's duties to its independent contractors and their employees (s 21(3)) and to other people (s 23), and the duty of whoever manages or controls the workplace (s 26), still apply, each to the business that holds it (page 9).[4]

Three moments the duties overlap most.

Our view: shared duties are hardest to keep straight when control of the work or the space changes hands. Each card is one of those moments, and what to settle in writing before it comes.

The change window opens.

Several trades work in one live hall at once, under your method of procedure. Settle who authorises each step, who holds each isolation, and who can stop the work.

Systems are energised.

At commissioning, the electrical, mechanical, fire, and controls trades all test on the same night. Settle who controls the switching, and who is allowed near which equipment (page 14).

The builder hands over.

The principal contractor's control ends and the operator's begins, often hall by hall. Settle the date control passes, and whose rules apply to the trades still finishing.

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 business a company, a government business, 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 the directors usually follow (section 4, taking the Corporations Act meaning). For the Crown and for a public authority, 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 (sections 247 and 252). An elected member of a local authority acting in that capacity is not an officer (section 4). What counts as a public authority is for your jurisdiction's Act.[1, 25]

Then

Name the officers by what they decide.

At an operator or a developer, that can include the chief executive, the board, and the executives who run operations, construction, and security: the role decides, not the title.

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 (conduct that, without reasonable excuse, exposes a person to a risk of death or serious injury or illness, with gross negligence or recklessness), carries a fine, up to 10 years in prison, or both, for an officer (section 31). For a business that is a body corporate, the model's Category 1 maximum is a fine of AU$12,321,000 for the year beginning 1 July 2026, as indexed under Schedule 4 and published by Safe Work Australia (s 31). Each jurisdiction sets its own penalties: check yours.[1, 32] It is not the ceiling: the model Act leaves room for an industrial manslaughter offence, and Victoria and WA are two that have one (below, and page 9).[1, 4, 20]

In Victoria.

The OHS Act 2004 (Vic) takes "officer" from section 9 of the Corporations Act (s 5(1)). An officer commits an offence where the body's contravention is attributable to the officer's failure to take reasonable care (s 144), and the workplace manslaughter offence also reaches officers (s 39G).[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 where contractors work in live halls. 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.

In data centres: a briefing when your state changes its electrical safety rules.

b

Understand.

The operations, and their hazards and risks.

In data centres: knowing where live electrical work happens, which rooms are gas protected, and which tanks and pits are entered.

c

Resource.

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

In data centres: one funded contractor process, used at every facility and in every change window.

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.

In data centres: contractor incidents and near misses, such as an arc flash or a gas discharge, reported to the same place as staff ones.

e

Comply.

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

In data centres: a written route for who notifies the WHS regulator after an incident in a hall.

f

Verify.

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

In data centres: 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 executive can ask for.

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

Contractors engaged this quarter, by facility and job, and how many were checked before their first shift.

Licences due to lapse in the next 30 days, and any whose status changed (suspended, cancelled, or conditions added), by contractor.

Live electrical work authorised, with a sample of risk assessments and safe work method statements compared with the work done; access granted to critical areas, and access removed when a contractor left.

Incidents and near misses, which regulator was told, and the corrective actions still open past their due date.

04 WHERE THE LAWS DIFFER

Three sets of law, and every state its own.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws." [3] Data centres add each state's electrical safety law, and two Commonwealth laws that apply everywhere.

State	Work health and safety	Electrical safety and licensing
Victoria	Occupational Health and Safety Act 2004 (Vic). An employer's duties extend to independent contractors it engages, and their employees, "in relation to matters over which the employer has control or would have control if not for any agreement purporting to limit or remove that control" (s 21(3)(b)), and it must ensure, so far as is reasonably practicable, that people other than its employees are not exposed to risks from its undertaking (s 23). Whoever manages or controls a workplace must ensure, so far as is reasonably practicable, that it and the means of entering and leaving it are safe and without risks to health, for matters it manages or controls (s 26). [4]	Electricity Safety Act 1998 (Vic) and its General Regulations 2019: licensed workers and registered contractors, and Victoria's own live-work rule (pages 14 and 15). [12, 13]
New South Wales	The WHS Act and Regulations. SafeWork NSW says the Work Health and Safety Regulation 2025 (NSW) commenced on 22 August 2025, and it refers to that Regulation's provisions as sections. [23]	As the regulators' own pages give it: licences for electrical wiring work, compliance certificates, and live work (pages 14 and 15). [14, 15, 16]
Queensland	The WHS Act and Regulations; the Regulation's electrical Part (sections 145 to 166) is "not used". [3, 28]	Electrical Safety Act 2002 (Qld) and Electrical Safety Regulation 2026, which replaced the 2013 Regulation on 1 September 2026: licences and the live-work rule (pages 14 and 15). [10, 11]
Western Australia	Work Health and Safety Act 2020 (WA). It binds the Crown (s 10), and has its own industrial manslaughter offence (s 30A). [20] Its WHS Regulations do not use the model's live-work rules (rr 154 to 162 "Not used"). [19]	Electricity (Licensing) Regulations 1991 (WA): licences, a duty on whoever engages, and its own live-work offence (pages 14 and 15). [18]
South Australia and Tasmania	Each state's own version of the model WHS Act and Regulations; text and numbering can differ, and South Australia's construction project threshold is AU$450,000. [3, 31, 39]	Each licenses electrical contractors, and licenses or registers electricians (page 15): Consumer and Business Services (SA); Consumer Affairs Tasmania (from 1 October 2026, replacing CBOS). [21, 22, 35, 40]
Every other state and territory	Each jurisdiction's own version of the model WHS Act and Regulations; text and numbering can differ. [3]	Not set out here: start with Access Canberra (ACT licensing), WorkSafe ACT (ACT WHS rules, live work included), and NT WorkSafe. [36, 37, 38]
Everywhere	Commonwealth law: the Security of Critical Infrastructure Act 2018 for a critical data storage or processing asset (pages 10 to 12), and the ozone law for refrigerant and suppression gas technicians (page 16). [5, 8]	

Unless another law is named, 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. [1, 2]



05 CRITICAL INFRASTRUCTURE

Critical infrastructure law can reach your contractors.

Some data centres are critical infrastructure assets under the Security of Critical Infrastructure Act 2018. Then, unless the business holds strategic-level hosting certification for the services concerned (s 30AB(4)), a written risk management program sits beside the WHS duties, and its people rules name contractors.[5]

> **A critical worker can be "an employee, intern, contractor or subcontractor of the responsible entity" for a critical infrastructure asset to which the risk management program applies.**
>
> Security of Critical Infrastructure Act 2018, section 5[5]

05 CRITICAL INFRASTRUCTURE

When your facility is a critical asset.

Not every data centre is. The Act asks what you provide, who you serve, and what data the service relates to. Business critical data includes personal information about at least 20,000 individuals, and information about a critical infrastructure asset's research and development, the systems and information needed to operate it, and its risk management and business continuity (s 5, which also defines the service in step 1).[5]

1

A data storage or processing service.

A service, provided on a commercial basis, that lets end-users store or back up data, or a commercial data processing service using one or more computers. The asset is owned or operated by the provider (s 12F).

s 12F[5]

2

Business critical data, for government or critical infrastructure.

The asset is used wholly or primarily to provide that service, relating to business critical data, to a Commonwealth, state, or territory government or a body corporate established by one of their laws, or to the responsible entity for a critical infrastructure asset, and the provider knows it.

s 12F(1), (2)[5]

3

How you hear.

A critical infrastructure customer that becomes aware it receives such a service must take reasonable steps to tell the provider. The responsible entity for the asset is the provider that owns or operates it, unless the rules prescribe another.

ss 12F(3), 12L(4)[5]

If it is, three duties apply.

Each applies after a grace period set by the rules. The third does not apply where the business holds strategic-level hosting certification for the services concerned (s 30AB(4)); that business gives an annual report instead (s 30AQ). The third is the one that reaches your contractors, and the next page sets it out.[5, 6, 7]

Register it.

The responsible entity gives the Secretary the asset's operational information by the later of the end of the grace period and 30 days after it becomes a reporting entity (s 23), including the arrangements under which each operator operates the asset (s 7(1)(e)); a notifiable event is reported within 30 days (s 24).[5, 7]

Report cyber incidents.

A cyber security incident with a significant impact on the asset's availability is reported to the relevant Commonwealth body within 12 hours of becoming aware (s 30BC); one that has occurred, is occurring, or is imminent and has had, is having, or is likely to have a relevant impact, within 72 hours (s 30BD). Unless rules name another body, the Act names the Australian Signals Directorate (s 30BF).[5, 7]

Run a risk management program.

Adopt, maintain, and comply with a written program to identify each hazard with a material risk of a relevant impact on the asset and, so far as is reasonably practicable, minimise or eliminate it (ss 30AC, 30AD, 30AH), with an annual report within 90 days of the financial year's end, approved by the board where there is one (s 30AG).[5, 6]

The baseline, not the enhanced rules. Data storage or processing assets are not on the list of assets subject to the enhanced program requirements (Rules s 4A(1)). The Rules' own note says a responsible entity is not required to use the AusCheck scheme to assess its critical workers unless its asset is on that list (s 9(2), note).[6] For generation, network, and water assets, the rest of the series is at complyflow.com/ebooks-reports.

05 CRITICAL INFRASTRUCTURE

What the program must do about contractors.

The risk management program Rules set requirements for each kind of hazard. Three of them decide how contractors reach your halls. Each card quotes what the program must have a process or system for.[6]

People.

Identify the entity's critical workers; permit a critical worker access to critical components "only where the critical worker has been assessed to be suitable to have such access"; and, so far as is reasonably practicable, minimise or eliminate material risks arising from malicious or negligent employees or contractors, and from the off-boarding process for outgoing employees and contractors (s 9(1)).[6]

Suppliers.

So far as is reasonably practicable, minimise or eliminate material risks including unauthorised access, interference, or exploitation of the asset's supply chain, misuse of privileged access to the asset by any provider in the supply chain, disruption from an issue in the supply chain, and risks arising from major suppliers (s 10).[6]

Physical access.

Identify the physical critical components; respond to incidents of unauthorised access to them; control access to them, "including restricting access to only those individuals who are critical workers or accompanied visitors"; and test that security arrangements are effective (s 11(1)).[6]

Which contractors are critical workers.

A critical worker is an individual whose absence or compromise would prevent the proper function of the asset or could cause it significant damage, as the responsible entity assesses, and who has access to, or control and management of, a critical component. A critical component is a part whose absence, damage, or compromise would do the same (both s 5). Your own assessment decides, and the suitability assessment considers, among other things, whether access would be prejudicial to security (Rules s 9).[5, 6]

Turning the program into the door.

Our recommendation: four habits that put the program into daily practice at the access point. None is a rule in itself; each serves one of the requirements above.

Name the roles, then the people. Roles show which contractor work may be critical, such as switching, UPS, and cooling controls. Each named person then gets their own assessment and authorised scope.

Assess before the first visit. Record each critical worker's suitability assessment, its date, and what it considered, before access, not after. Keep the evidence behind it access-controlled.

Escort the rest. Anyone else reaches a critical area only as an accompanied visitor, and the escort is recorded against the visit.

Close access when the need ends. When each person's authorised need ends, not only the contract: passes, keys, remote accounts, and vendor access, each confirmed by a named owner. Suspend at once on a risk event, and time-limit temporary access.



06 ELECTRICAL WORK

Dead is the default, even in a facility that never powers down.

A live hall puts constant pressure on a crew to work energised. The model Regulations start from the opposite rule, and allow live work only in four cases, with controls.[2]

> **A business "must ensure that electrical work is not carried out on electrical equipment while the equipment is energised."**
>
> Model Work Health and Safety Regulations, regulation 154[2]

06 ELECTRICAL WORK

The model rule, step by step.

Most of these duties sit on the business doing the electrical work. Three bind every business at the workplace, yours included (r 153): no inadvertent re-energising (r 156), only authorised people in the immediate area of live work (r 159), and nobody able to touch an exposed energised part by accident (r 160). Live work is authorised only after consulting whoever manages or controls the workplace, often the operator. [2]

1

Test first.

Before electrical work, a competent person tests whether the equipment is energised; each exposed part is treated as energised until it is isolated and determined not to be, and each high voltage exposed part is earthed after being de-energised.

r 155 [2]

2

Keep it dead.

Equipment de-energised for the work is not inadvertently re-energised while the work is carried out.

r 156 [2]

3

Live only in four cases.

Health and safety requires it, the equipment must be energised for the work to be done properly, it is testing under r 155, or there is no reasonable alternative.

r 157(1) [2]

4

Before live work.

A risk assessment by a competent person, recorded; clear access and a marked, operable isolation point; and authorisation after consulting whoever manages or controls the workplace.

r 158 [2]

5

During live work.

A competent person with suitable, tested tools and protective equipment, a safe work method statement, and a safety observer assessed in the past 12 months as competent to rescue and resuscitate (not needed for testing only, where the risk assessment shows no serious risk).

r 161 [2]

6

Keep the records.

The risk assessment until at least 28 days after the work, and the safe work method statement until it is done; both at least 2 years after a notifiable incident.

r 162 [2]

On construction work, maintenance included.

Construction work on or near energised electrical installations or services is high risk construction work, so the business carrying out the work makes sure a safe work method statement is prepared before it starts, and on a construction project the principal contractor takes all reasonable steps to obtain a copy (rr 291(k), 299, 312). [2]

Why it matters. SafeWork NSW reported that on 24 November 2025, during UPS commissioning, an electrician fitting meter probes to uninsulated copper bars inside a switchboard came into contact with energised components and received a fatal electric shock. Its release lists isolating every energy source and testing that equipment is de-energised before work starts among the controls. [17]

06 ELECTRICAL WORK

Where the states use their own rules.

Three states do not run the model's live-work rule, and every state licenses its electricians. Read across: the live-work rule, then who must be licensed and any duty on the business that engages.

State	Live electrical work	Licences, and the business that engages
Queensland	Electrical Safety Regulation 2026: the same four cases, and "near" means within 3 metres of an exposed energised part (ss 193, 195); live work is authorised after consulting whoever manages or controls the workplace, with a safety observer unless it is testing only and carries no serious risk (ss 199, 203). Three duties are not limited to the business doing the work: no inadvertent re-energising, only authorised people in the immediate area, and no inadvertent contact with exposed live parts (ss 194, 197, 201, 202). [11]	Electrical work needs an electrical work licence that covers it, except, among others, telecommunications cabling (s 55); a business that includes electrical work needs a contractor licence, uses licence holders, and keeps a register of the licensed workers it engages (ss 56, 57AA, 57AB). A business that contracts to deliver electrical work, such as a principal contractor on a fit-out, needs a contractor licence itself unless the electrical work is to be subcontracted to a licensed electrical contractor (s 56(2), (3)). After the work, the contractor gives you a certificate of testing and safety (Regulation s 208). [10, 11]
Victoria	Electricity Safety (General) Regulations 2019: no electrical installation work on energised equipment except in four cases; a recorded risk assessment, and authorisation after consulting whoever manages or controls the premises (regs 509, 510). The duties sit on the electrical contractor, or on the employer of an in-house electrician (reg 508). [13]	Prescribed electrical work only by a licensed worker (s 38); a business employs workers for installation work only as a registered electrical contractor, unless it uses its own licensed employee on premises it owns or occupies (s 36). You receive a certificate of electrical safety for the work (s 45A). [12]
New South Wales	SafeWork NSW says the NSW WHS Regulation 2025 prohibits work on energised electrical equipment except in four circumstances, points to its Part 4.7 and to the Code of Practice: Managing Electrical Risks in the Workplace, and says that since 1 July 2026 a business must comply with an approved code of practice or manage the risk to an equivalent or higher standard. [16, 23]	The Building Commission says any electrical wiring work needs a licence or certificate, and is done by or under the supervision of a licensed electrician; a compliance certificate is lodged within 7 days of the test. [14, 15]
Western Australia	The WHS Regulations do not use rr 154 to 162; the business, or whoever manages or controls the workplace, has the part tested and de-energised first (r 152), and anyone who carries out or causes live work commits an offence unless the Electricity (Licensing) Regulations' conditions are met (r 55). [18, 19]	Electrical work needs a licence (r 19), and an electrical contracting business a contractor's licence (r 33); knowingly contracting with an unlicensed contractor is an offence (r 34); nobody may employ, engage, or instruct an unlicensed person (r 53(2)); whoever employs or engages a licence holder keeps a record of the licence until 2 years after the holder stops being employed or engaged (r 57). [18]
SA, Tasmania	Each state's own WHS Regulations: check yours for the live-work rule.	SA: contractors licensed and workers registered (ss 6, 13). Tasmania: an owner or occupier who authorises electrical work ensures, so far as is reasonably practicable, that whoever is engaged holds the licence (s 24). [21, 22]

Not set out here: the ACT (Access Canberra for licensing, WorkSafe ACT for live work) and the Northern Territory (NT WorkSafe). [36, 37, 38]

Our recommendation, in every state. Hold each electrician's licence, class, conditions, and status before the work is booked, ask for every job's certificate, and record your consultation before any live work.



07 COOLING, GAS, AND ENCLOSED SPACES

The gas in the plant is someone's licence.

Trades that work on equipment using a scheduled refrigerant, or handle a scheduled extinguishing agent, need a Commonwealth licence.

Refrigerant and suppression gas: the technician's licence.

Two licences the technician needs, and the rules that can bind you as the owner.[8, 9]

Cooling.

On refrigeration and air conditioning equipment that uses a CFC, HCFC, HFC, PFC, or halon, anything done with the refrigerant, or a component of the equipment, that involves a risk of refrigerant being emitted needs a refrigerant handling licence that entitles the person to that work, unless an exception applies, such as a special circumstances exemption (regs 110, 111). That includes installing, commissioning, servicing, and maintaining the equipment, whether or not refrigerant is present. Not every task near a cooling unit is covered: match the licence class to the job.[8]

Gas suppression.

Handling an extinguishing agent for fire protection equipment, including installing, maintaining, or decommissioning the equipment, needs an extinguishing agent handling licence (reg 302). The agents are scheduled substances, such as Halon-1301 and HFC-227ea (reg 301; Act Sch 1).[8, 9]

What binds you.

Holding bulk refrigerant or bulk agent, outside equipment, needs a trading authorisation (regs 112, 303); possessing halon for fire protection, a halon special permit (reg 304); a test discharge of a fire extinguishing system, a permit (reg 305).[8]

The ozone law we read puts the licence duty on the person doing the work, not on the business that engages them.[8] Our recommendation: check it before the job is booked anyway (gas-protected rooms: page 18).

07 COOLING, GAS, AND ENCLOSED SPACES

Enclosed plant spaces: the test, then the controls.

Under the model Regulations, a confined space is enclosed or partly enclosed, not designed or intended primarily for people, at normal atmospheric pressure while anyone is in it, and a risk from its atmosphere, contaminants, or engulfment (r 5). Victoria's Regulations use their own definition, with a restricted way in or out as one test (r 5).[2, 29] Our view: a fuel tank, a sump, or a pit may meet it; a room people are meant to work in usually does not. These duties fall on each business that manages or controls the space (r 62(2)).[2]

Before entry.

A written risk assessment by a competent person (r 66); connected plant and services isolated, so far as is reasonably practicable (r 70); no ignition source that could cause a fire or explosion (r 73); signs at each entry (r 68); continuous communication and a standby person (r 69); first aid and rescue set, practised, and started from outside (r 74).[2]

The atmosphere.

A safe oxygen level while anyone works inside: from 19.5%, the floor published in the model WHS Regulations as at 5 December 2025, to 23.5% by volume, the ceiling published in the model WHS Regulations as at 5 December 2025; where that is not reasonably practicable and oxygen is below that range, air-supplied respiratory equipment (r 71(2)). Purging or ventilation never with pure oxygen or a mix above 21% oxygen by volume, the limit published in the model WHS Regulations as at 5 December 2025 (r 71(1)). Flammable gas kept below 5% of its LEL so far as is reasonably practicable; workers come out at 5% unless a calibrated, continuous-monitoring detector is used, and at 10% regardless (r 72, as published in the model WHS Regulations as at 5 December 2025).[2]

The permit.

No worker is directed in without a written entry permit, completed by a competent person, naming the space, the people, the time, and the controls, with room to sign that everyone has left (r 67). It records the controls; it does not replace them. Workers who enter or work in the space, who support the work or the rescue from outside, and those who supervise them are trained, and the record kept 2 years (r 76).[2]

07 COOLING, GAS, AND ENCLOSED SPACES

Battery rooms, generators, and gas-protected rooms.

The model Regulations have no rules written for lithium-ion battery rooms: the hazardous chemicals Part does not apply to hazardous chemicals in batteries incorporated in plant (r 328(4)(a)). That exclusion reaches only the hazardous chemicals Part. It does not remove the general duty to manage risks (s 19), and on a build, work on or near fuel lines is high risk construction work (r 291(j)).[1, 2] A permit is a record that supports the controls below. It is not the control.

Battery rooms.

Our recommendation: settle these before anyone goes in, and have your electrical and fire specialists approve them for your batteries.

Know the battery.

Record the chemistry (lithium-ion, valve-regulated lead-acid, or another), the maker's handling and emergency instructions, and who owns them. The risks differ: heat and fire, electrical, and the atmosphere.

Fire, gas, and ventilation.

Ventilation and detection suited to the chemistry; the room's alarms, the evacuation route, and how responders are told what is in the room and where it is.

Damaged batteries.

A swollen, hot, leaking, or venting battery is escalated at once, not worked on. Safe handling, storage, and disposal follow the maker's instructions and the waste rules that apply to you.

Generators and gas-protected rooms.

Generators and fuel.

Our recommendation: generator tests and fuel deliveries booked like any other change, with the fuel contractor signed in and the area kept clear while fuel moves.

Decide per task, not per room.

Entering a room protected by a gas suppression system does not mean the system is switched off. Our recommendation: a task-based impairment assessment, authorised by the person responsible for fire protection, before any protection is impaired.

Impair, cover, and restore.

If protection is impaired: affected parties told, compensating controls in place, who is in the room and how they leave agreed, and restoration tested and handed back in writing. Follow your site's approved fire-protection procedure.

The permit names the work, the people, who is told, the room's own emergency steps, and who makes the system safe and who restores it. These steps are our recommendation and need your fire-safety specialist's approval; they are not a switching or fire-system instruction.

08 WORKED EXAMPLE

A UPS swap in a Brisbane colocation hall.

A colocation operator in Brisbane is replacing a module in a live hall's uninterruptible power supply (UPS). The hall is used wholly to store a Queensland government agency's business critical data, and the operator knows it. The numbers below are Queensland's own laws and the Commonwealth's. The sequence is illustrative: your electrical technical owner approves the real one.[5, 10, 11]

What is live	Why it matters	What gets checked and kept
The facility	The hall is a critical data storage or processing asset (SOCI Act s 12F(1)). The operator holds no strategic-level hosting certification for the service (s 30AB(4)), so its risk management program applies: it identifies critical workers and lets them reach critical components only once assessed as suitable, and restricts access to physical critical components to critical workers or accompanied visitors (Rules ss 9(1), 11(1)).[5, 6]	Whether the UPS technicians are critical workers; their suitability assessments; the escort record for anyone who is not
The electrical contractor	Its business includes electrical work, so it needs an electrical contractor licence, uses holders of an electrical work licence that authorises the work, and keeps a register of the licensed workers it engages (Electrical Safety Act ss 55, 56, 57AA, 57AB).[10]	The contractor's licence; each electrician's licence, class, conditions, and current status, checked before the window opens
The isolation	Before the work, a competent person tests whether the equipment is energised, and each exposed part is treated as energised until isolated and found not to be (Regulation s 196); it is not inadvertently re-energised during the work, and an isolation device not under the worker's sole control is signed and locked open or otherwise stopped from closing (ss 197, 198).[11] Our recommendation: isolating one input does not make a live hall safe. Alternate supplies, bypass paths, batteries, and stored energy can remain, so identify every one, follow the approved switching sequence, prove de-energisation at the work point, and prevent backfeed and automatic reconnection.	Every supply and store of energy listed; the approved sequence; the test at the work point; the isolation points, locks, and tags, and who holds them, on the permit
If any part must stay live	Only in one of the four cases (s 195), after a competent person's recorded risk assessment and a safe work method statement, and authorised after consulting whoever manages or controls the workplace, here the operator (s 199); a safety observer watches unless it is testing only with no serious risk (s 203).[11]	The operator's record of the consultation; the risk assessment, kept at least 28 days after the work (s 204); the observer named
The handback	The work is tested to ensure it is electrically safe, and the contractor gives the operator a certificate of testing and safety (Regulation ss 207, 208).[11]	The certificate, kept with the change record
The people in the hall	Every business that engages a technician, or influences or directs the technician's work, owes the technician its primary duty (Work Health and Safety Act 2011 (Qld) ss 7, 19), and every duty holder consults, cooperates, and coordinates with the others (page 6).[30]	Each technician signed in and out; who notifies each regulator after an incident, agreed first (page 20)

08 WORKED EXAMPLE

If something goes wrong in the hall.

Protect life and call 000 first. Then up to three separate duties can apply to the same event, each with its own trigger and clock. In the Brisbane hall they are the WHS regulator, the Electrical Safety Office, and, because the hall is a critical asset, the Commonwealth cyber rules. Notify without waiting for anyone's approval, the contract manager's included.

Route	When it applies, and the clock	Who is told
Work health and safety	A notifiable incident: a death, a serious injury or illness, or a dangerous incident (ss 35 to 37); under the model Act as at 5 December 2025, where your state has adopted it, also a violent incident or a notifiable suicide (page 22). Notify immediately after becoming aware (s 38). Whoever manages or controls the workplace preserves the site, so far as is reasonably practicable, until an inspector releases it (s 39; in Queensland, until an inspector arrives or directs otherwise). [1, 30]	The WHS regulator for your state; in Queensland, Workplace Health and Safety Queensland
Electrical safety (Queensland)	A serious electrical incident or a dangerous electrical event, which can include an event where nobody is hurt (Electrical Safety Act 2002 (Qld) ss 11, 12). Each business whose conduct it arises out of ensures the regulator is notified immediately after becoming aware, by the fastest possible means (Electrical Safety Regulation 2026 (Qld) s 292). Whoever manages or controls the place keeps the site undisturbed, so far as is reasonably practicable, until an inspector arrives or directs otherwise, and nobody moves or interferes with the electrical equipment involved except as the section allows, such as to help the injured or make the site safe (s 296). [10, 11, 33]	The Electrical Safety Office. In law it is the same regulator as for the WHS notice (Electrical Safety Act 2002 (Qld) sch 2), and one phone line, 1300 362 128, takes both
Critical infrastructure cyber	Only at a critical asset: a cyber security incident with a significant impact on the asset's availability, within 12 hours of becoming aware (s 30BC); one that has occurred, is occurring, or is imminent and has, or is likely to have, a relevant impact, within 72 hours (s 30BD). [5]	The Australian Signals Directorate, unless the rules name another body (s 30BF)

The first hour.

Our recommendation: name one caller and one backup for each route, agreed with every contractor before the change window.

1. Protect life. Call 000, make the area safe, and do not disturb the scene beyond what safety needs.

2. Notify. The named caller tells each regulator that applies, and the backup steps in if the caller cannot.

3. Preserve. Keep the site and the evidence, including electronic and digital records and witness details, until an inspector releases them.

4. Record. Who called, when, and what was said; each business keeps its own duty, whoever notified.

The same night, on paper and joined up.

The same checks, done two ways: an illustrative weak process on the left, a controlled one on the right.

On paper

The electrician's licence was checked at tender; the risk assessment is in a crew member's van; the escort is a name in the visitor book; nobody can say who held the isolation, or when access was removed.

Joined up

Each technician signs in at the door, licence and suitability checked against the record; the method of procedure, the permit, the isolation, and the consultation sit on the change; the certificate is filed the same night.

09 THE RECORD

What to hold for every contractor.

Numbers are the model WHS laws' unless another law is named; your state's may differ (page 9).

LAW Act, Regulations, or Rules **POLICY** policy or contract terms

REGULATOR guidance **GOOD PRACTICE** our recommendation; a contract, policy, or law may still require it

Level	What to hold	Status and source
The company	Its electrical contractor licence or registration where its state requires one, with status; any trading authorisation it needs to hold bulk refrigerant or suppression agent; the cover the contract asks for, with dates, and its workers compensation cover	**LAW** Qld s 56, Vic s 36, WA r 33, page 15; regs 112, 303, page 16 [8, 10, 12, 18] **POLICY** the contract's cover
The worker	Written evidence of any high risk work licence (such as for a forklift or a crane), sighted before the work and kept at least 1 year after; class, scope, conditions, and status checked, and reviewed on a suspension, an incident, or a change of scope; a renewal never re-approves by itself	**LAW** r 85(1) and (4) [2] **GOOD PRACTICE** the status check
	The electrical licence the work needs, by state; the refrigerant handling or extinguishing agent handling licence for cooling and suppression work; confined space training for everyone who enters, supports, or supervises, recorded and kept 2 years	**LAW** the worker's licence, pages 15 and 16; r 76; where you employ or engage the electrician, WA r 57 and Tasmania s 24 [2, 8, 18, 22] **GOOD PRACTICE** holding the licences yourself elsewhere
Critical access	Where the facility is a critical data storage or processing asset and the risk management program applies to it (page 11): which contractors are critical workers, each one's suitability assessment before access to critical components, the accompanied visitor record, and the date each person's access ended, passes, keys, remote accounts, and vendor access included	**LAW** Rules ss 9(1), 11(1), page 12 [6] **GOOD PRACTICE** the escort record and the end date
The electrical job	For live work: the risk assessment, kept at least 28 days after the work, and the safe work method statement, kept until it is done (each 2 years after a notifiable incident); the record of your consultation; the compliance or safety certificate	**LAW** rr 158, 162 (kept by the business doing the work); Qld s 208, Vic s 45A [2, 11, 12] **REGULATOR** NSW certificate [15] **GOOD PRACTICE** your consultation record

09 THE RECORD, CONTINUED

The visit, the incident, and private records.

Same tags as the page before. Numbers are the model WHS laws' unless another law is named (page 9).

LAW Act, Regulations, or Rules POLICY policy or contract terms

REGULATOR guidance GOOD PRACTICE our recommendation; a contract, policy, or law may still require it

Level	What to hold	Status and source
The facility and the visit	An induction suited to the work and its risks; a SWMS for high risk construction work; a written confined space entry permit, kept until the work is done, and its risk assessment, kept at least 28 days after it (each 2 years after a notifiable incident); for remote or isolated work (cut off from help by location, time, or the nature of the work, such as a night call-out at a lightly staffed facility), a system of work that includes effective communication, such as a check-in plan; sign in and out by facility and zone	LAW rr 39, 299, 67, 77, 48 [2] GOOD PRACTICE the induction form, the check-in plan, and sign-in
	Keep each record for the longest of the legal minimum, any government records rules that bind you, and any incident or claim hold. The employee records exemption covers only an employer's own employees' records, not what you hold about a contractor's workers	GOOD PRACTICE the retention schedule LAW Privacy Act 1988 (Cth) s 7B(3) [27] REGULATOR OAIC, employment [26]
The incident	Under the model Act as at 5 December 2025, where adopted: violent incidents notifiable, notifiable suicides (immediately) and extended absences (within 14 days) added, one notice per event; records kept at least 5 years; the site and the evidence, including electronic and digital records and witness details, preserved, so far as is reasonably practicable, until an inspector releases the site; notifier and site controller tell each other at once; no business's own duty moves; a serious event escalated at once.	LAW ss 35, 35A, 35B, 38, 39, 39A, where adopted [1] GOOD PRACTICE the escalation; routes and callers, page 20
Suitability and personal information	Show the access desk a decision, the authorised scope, and an expiry or review date, not the background material. Record why the information is collected, who may review it, where it is stored securely, how long it is kept and why, and how it is destroyed or de-identified, subject to any legal hold; log who opens sensitive records	LAW where the Privacy Act applies to you: reasonable steps to protect the information from misuse, interference, loss, and unauthorised access (APP 11.1), and to destroy or de-identify it once you no longer need it, unless an Australian law or a court or tribunal order requires you to keep it (APP 11.2) [34] GOOD PRACTICE the minimum-access view and the access log

09 CHECKLIST

Before a contractor starts.

Each line is tagged: the law, or our recommendation. Fill in the owner and evidence as you go. It runs over two pages.

	Check	Owner	Date and evidence ref.
	Before engagement		
☐	We know which WHS law, which electrical safety law, and which regulators apply to each facility, and whether any facility is a critical data storage or processing asset. **Law, pages 9 and 11** **Good practice** the access map, page 25		
☐	The company's insurance and workers compensation cover are on file, with dates, apart from its workers' licences. **Policy** the contract, page 21		
☐	Each electrical contractor holds the contractor licence or registration its state requires; in WA, we never knowingly contract with an unlicensed contractor (r 34) and never engage or instruct an unlicensed person (r 53(2)); in Tasmania, we make sure, so far as is reasonably practicable, that whoever we engage holds the licence (page 15). **Law, page 15** **Good practice** the status check		
☐	If we contract to deliver electrical work in Queensland, such as on a fit-out, we hold an electrical contractor licence, or subcontract all of that work to a licensed electrical contractor. **Law, page 15**		
☐	Cooling and gas suppression technicians hold the refrigerant handling or extinguishing agent handling licence the work needs. **Law binds the technician, page 16** **Good practice** our check		
	Before the work starts		
☐	At a critical asset where the risk management program applies (page 11): we know which contractors are critical workers, each was assessed as suitable before access to critical components, and anyone else is an accompanied visitor. **Law, page 12** the suitability record		
☐	A SWMS for each kind of high risk construction work, including work on or near energised electrical installations, on or near chemical, fuel, or refrigerant lines, in or near a confined space, where the atmosphere may be contaminated or flammable, where powered mobile plant moves, and where a person could fall more than 2 metres. **Law, r 291(a), (f), (j), (k), (l), (o)** versions and dates		
☐	Each worker's high risk work licence, electrical licence, and tickets are on file, with class, scope, conditions, and current status. **Law, pages 3 and 15 (the licences)** **Good practice** the tickets and the status check		
☐	On a construction project (construction work at or above the cost threshold on page 5), one principal contractor at a time; on any construction work, every worker holds general construction induction training. **Law, page 5**		
☐	Before work in a gas-protected room, we decide per task whether protection must be impaired; if so, authorisation, notice, cover, and tested restoration are recorded. **Good practice, page 18**		

09 CHECKLIST, CONTINUED

On the day, and after.

	Check	Owner	Date and evidence ref.
	On the day, at the facility		
☐	Every worker signed in and out by zone; any high risk work licence sighted first. **Law, page 3 (licences)** **Good practice** sign-in by zone		
☐	Electrical work is done de-energised: tested first by a competent person, isolated, and not inadvertently re-energised; every energy source identified, de-energisation proved at the work point, and locks and tags recorded. **Law, pages 14 and 15** **Good practice** energy list, work-point test, locks and tags		
☐	Any live work is in one of the four cases, with a recorded risk assessment, a SWMS, our consultation before it is authorised, and a safety observer where the law requires one. **Law, pages 14 and 15** the consultation record		
☐	A confined space classified first; if it is one: written risk assessment, connected plant isolated, no ignition source, signs at each entry, standby and communication, purging or ventilation that never uses pure oxygen or an oxygen-enriched mix, a safe oxygen level (or, where that is not reasonably practicable and oxygen is below the safe level, air-supplied respiratory equipment), flammable gas within the limits or workers out, air-supplied respiratory equipment for anyone entering to rescue where the atmosphere is or may become unsafe (r 75), practised rescue (r 74), training for everyone who enters, supports, or supervises, and a written entry permit. **Law, page 17, rr 74, 75** permit numbers		
☐	A worker doing remote or isolated work, cut off from help by location, time, or the nature of the work, such as a technician on a night call-out at a lightly staffed facility, has a system of work that includes effective communication, such as a way to call for help that works there; someone watches the check-ins and escalates a missed one. **Law, r 48** **Good practice** who watches, and the escalation		
	At the end of the job		
☐	The electrical work is tested and we hold the compliance or safety certificate for it. **Law, page 15 (Qld, Vic)** **Regulator** NSW **Good practice** other states		
☐	Unsafe electrical equipment found during the work is disconnected and stays disconnected until repaired or tested and found safe, or replaced. **Law, r 149**		
☐	When each person's need ends, not only the contract, their passes, keys, and remote accounts are removed and confirmed; at a critical asset, off-boarding risks are handled as the program says. **Law, page 12 (the program)** **Good practice** the removal and its confirmation		
	If something goes wrong, and standing		
☐	For each route (WHS, electrical, cyber), each contractor knows who notifies, with a backup (as lead notifier, where your state has adopted the model rule), and who preserves the site until an inspector releases it; each business keeps its own duty. **Law, page 20 (incident routes)** **Good practice** the agreed route		
☐	Officers receive a regular report that verifies the checks happen: lapsed licences, live work authorised, access not removed, overdue actions, and a sample of permits and SWMS checked against the work done. **Good practice; verifying is part of due diligence, page 3**		

09 TEMPLATE

The contractor access map.

Two parts, each with an example row. Part A is the role: where it may go and what it must hold. Part B is the named individual: the evidence, the assessment, and when access ends. The access desk sees the decision, scope, and review date only.

Part A. The role.

Role and facility	Zones and equipment	Licences and tickets the role needs	Potentially critical work?	Escort, permit, and who authorises
Example: UPS maintenance electrician, Brisbane colocation hall 2	*Electrical room and UPS bay; no customer cages*	*Queensland electrical work licence; the contractor's electrical contractor licence*	*Yes, potentially: the role reaches a critical component. Where the operator assesses that losing or compromising the person could significantly damage the asset, the person is a critical worker, assessed as suitable before access (page 12); our recommendation is to assess each person regardless*	*Unescorted in the electrical room once assessed; isolation permit; live work only after the operator is consulted*

Part B. The individual.

Named worker (or worker ID), and role	Licence and ticket evidence, with status	Suitability assessed: by whom, when, and the decision	Authorised scope, and review trigger	Access ends: each pass, key, account, and who confirms
Example: worker ID W-0412, UPS maintenance electrician	*Electrical work licence checked 03/11/2026, class and conditions recorded; reference EV-218*	*Operator's security manager, 03/11/2026: suitable (assessment held in the restricted file)*	*Electrical room and UPS bay only. Review on a licence change, an incident, or a new scope; next review 03/05/2027*	*The end of this person's authorised need or the contract, whichever is first: pass, keys, remote diagnostics account, and vendor portal; confirmed by the security manager*

How to keep the map true.

A map nobody keeps current is worse than none, because the security desk trusts it. Our recommendation: three habits keep it right.

Fill it in together.

Facilities, security, safety, and procurement should agree each row. Where they disagree, there is a gap in who does what, and the duty does not wait for it to close.

Review it on any change.

A new contractor, a new hall, a change of licence class, or a change in who the facility serves changes the row. Give each row a review date.

Keep it with the record.

The map is only useful if the security desk, the shift lead, and the on-call manager can see it when a contractor arrives.

10 ONE STANDARD ACROSS EVERY FACILITY

The same standard at every facility.

Every check in this guide has to work at every facility, day or night, from the first trade on a new build to the last change window before handover.

Questions to ask about how you manage it today.

1. If a regulator asked who was in hall 2 last Thursday night, and what each held, how long would the answer take?
2. For every live electrical job this year, can you show who authorised it, and that you were consulted first?
3. When an electrician's licence is suspended or lapses, who finds out before the next change window?
4. Do you hold a contractor's licence and each worker's licences separately, so one is never taken as proof of the other?
5. Do you know which contractors are critical workers, and when each was assessed as suitable?
6. When a person's authorised need ends, how long until every pass, key, and remote account is removed, and can you show the date?
7. Have you agreed with each contractor who reports a notifiable incident?
8. How many hours a month go on chasing licences and certificates?

What to look for in a system.

Seven capabilities that keep these checks working at every facility. A system holds the evidence; it does not by itself prove a control worked, and an expiry reminder does not revoke access. Ask how each point works at your doors, with an offline fallback and emergency access.

- **Company and worker, kept apart.** A contractor's panel approval and each worker's clearance, on one record but never confused.
- **Requirements set once, extras per facility.** Requirement sets for the whole portfolio, with extras where one facility needs more than another.
- **Expiry tracked for you.** Reminders and re-approvals sent before a licence or ticket lapses.
- **A check at the door.** The record checked at the access point, around the clock: not cleared, not in.
- **Permits on the same record.** Hot work, isolation, confined space, and battery room permits, approved by a named authoriser and closed with a time-stamped record.
- **Who is in the facility right now.** A live list for roll calls and evacuations.
- **A record for the audit.** One searchable record per hall, with scheduled reports.

START SMALL

Start with one hall.

Take one hall or one contractor, fill in its rows of the access map on page 25, and run the checklist on pages 23 and 24 against its workers. Close the gaps first: the right licences, live work authorised properly, access ended when each person's need ends. Then ask anyone offering a system to show each point above on your own facilities.

SOURCES

Every source, with the date it was read.

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This guide is general information, not legal advice. It summarises the laws and regulator guidance listed above, as read on the dates shown; each jurisdiction's law can differ. For a decision about your own facilities, read the law that applies to you and take legal advice. A contractor management guide, not a technical manual.

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