COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

# Education: the contractor compliance guide.

What Australian law asks of schools, universities, TAFEs, and colleges when contractors work on campus, and how to prove you met it.

**Current to November 2026**
Model WHS laws as at 5 December 2025; state and department pages read 5 and 10 November 2026

**Includes**
A two-page checklist and a campus works map

**Covers**
Schools, universities, and TAFEs, with every state's check named

START HERE

# The short version.

The 6am cleaner, the night patrol, the electrician above a classroom ceiling, and the roofer on the library in January all work where children learn. For WHS purposes, they are your workers, and a working with children law can reach them too.

1 **Contractors are workers, for WHS purposes.** Under the model WHS Act, a person who carries out work for a business as a contractor or subcontractor, or as a contractor's employee, is a worker of that business. Victoria reaches them through its own Act (page 8).[1, 4]

2 **Students are the "other persons".** A school or university must ensure, so far as is reasonably practicable, that other persons' health and safety is not put at risk from its work, and the model Regulations name schools when securing a construction site.[1, 2]

3 **Working with children checks follow the state and the role.** Each state's law decides which roles need one, and many departments ask more. The NSW Department of Education asks it of every contractor a school engages directly, and of School Infrastructure contractors at an operating school, with identity and "Not to be Employed" checks too; in Western Australia, most contractors are not eligible for one (page 10).[14, 28]

4 **Older buildings put the asbestos register in the trade's hands.** It must be readily accessible to workers and businesses that carry out work there; a business whose work risks exposure to airborne asbestos must be given a copy; and before refurbishment it is reviewed and handed over (page 14).[2]

5 **Being let in is not being authorised to work.** High risk construction work needs a safe work method statement before it starts, and work that departs from it is stopped. Permits and a handback close the gap (page 17).[2]

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01 THE PRACTICAL TEST

# The practical test is what you can show.

A school system or a university rarely runs one building. It runs dozens of schools or campuses, many built decades ago, each with children or students there whether or not the facilities team is. At any one of them, the question that matters is easy to ask and hard to answer: who was on site, and what did they hold on the day?

## An approved company is not a cleared worker.

Most contractor checks stop at the company. The law reaches further. A contractor's employees who carry out work for your business are your workers too, for WHS purposes (section 7(1)),[1] and a working with children check attaches to each person, not to the company that sends them.[12, 13] A cleaning company approved last year says little about whether the cleaner on tomorrow's 6am shift holds a current check, has been inducted to this school, and is expected here today.

ASSESSED BEFORE ENGAGEMENT; REVIEWED WHEN SOMETHING CHANGES

### The company

- ✓ Selected against clear criteria, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Insurance, and workers compensation that covers the people they send, with expiry dates
- ✓ The contract: who checks, who screens whom, and who gives the trades the asbestos register

CHECKED AT EVERY DOOR, ON THE DAY

### Each worker, at each site

Primary school | High school | University campus

- ✓ Any high risk work licence, sighted before the work (r 85)[2]
- ✓ A working with children check where the state's law or your own policy requires one, verified with the issuing agency[13]
- ✓ Inducted to this site, signed in at the front office or gate, and supervised to match the work

## Where it usually breaks.

Four common gaps, each one making it harder for a school to show who was on site and what they held.

**Checks held somewhere else.**
Working with children numbers sit in a head office file or with the contractor's own office, and nobody at the school's front desk can see whether today's worker has one.

**Checked by hand.**
Someone looks up each clearance and types its expiry date into a spreadsheet. It holds until that person is on leave, or the holiday works bring 40 new names in a week.

**Different rules at every school.**
One principal asks for a sign-in and an escort; the next asks for neither. The standard is whatever the business manager decided that term.

**No view across the system.**
Nobody can say which trades are current across every school, or who was in a building last Tuesday.

**Consistent does not mean identical.** One standard for every contractor, each school's own requirements on top. 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

# One campus, many duty holders.

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. That business "must ensure, so far as is reasonably practicable, the health and safety of" the workers it engages or directs while they are at work in the business, and must ensure that the health and safety of other persons is not put at risk from its work.[1] On a school or campus, those other persons include every student, parent, and visitor, and, for a contractor, the school's own staff.

02 THE DUTY HOLDERS

## Who the school owes the duty to.

Page 4 covers the duty to students and visitors. Three more sections of the model Act reach well past the school'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" 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 subcontracted electrician you never contracted with.[1]

### The building 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 the campus.

The school, the system, or the university sits at the top. Every team, tenant, contractor, and worker below it brings people onto the campus, and each one needs a place in your checks.

**The school, the system, or the university**
Runs the campus; in our view, usually the business with management or control of its buildings

**Facilities and capital works**
In-house, an FM company, or a project manager: engages and directs the trades

**Principals and campus managers**
People, not separate businesses. Each has a worker's duties (section 28), and may also be an officer, depending on the role (section 4); they decide when and where work can happen

**Other businesses on site**
Canteens, outside school hours care, childcare centres, tenants: each brings its own contractors

**Contractors**
Cleaning, security, grounds, HVAC, electrical, plumbing, roofing, fire services, pest control

**Subcontractors and labour hire**
The contractors' own subcontractors, agency staff, and apprentices

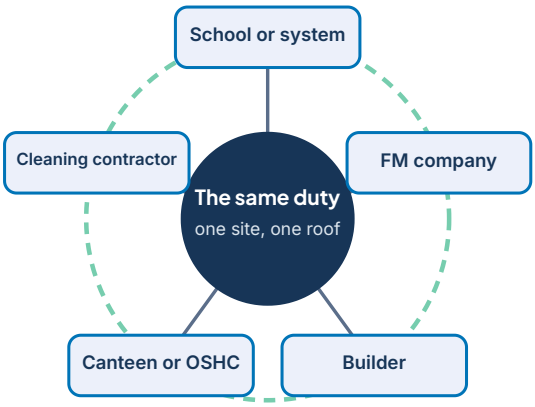
**Their workers**
The people who actually walk past the classrooms

**Our view:** in a government school, plan on the state, through its education department, holding the duties; in a Catholic system, the system authority or the school; in an independent school, its company; in a university or TAFE, the institution. Write down who controls each building.

03 SHARED DUTIES

# Shared, but never handed over.

A cleaning contract, an FM contract, and a builder's contract for the new science block all put more than one business on the same site, often with children nearby. The model WHS Act sets four rules for that.




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] 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, March 2022[10]

## When the works are a construction project.

### Who is the principal contractor.

Under the model Regulations, a construction project is construction work costing AU$250,000 or more. The business that commissions it is the principal contractor, unless it engages another business as principal contractor and authorises it to have management or control of the workplace and to discharge those duties. There is only one at a time (r 292, r 293).[2] The principal contractor threshold is AU$350,000 in Victoria, where the owner is the principal contractor unless it appoints one and authorises it to manage or control the workplace (r 333(1)), and AU$450,000 in South Australia (page 8).[5, 7]

### What the principal contractor does.

- Signs showing its name and telephone numbers, including an after hours number, visible from outside the site (r 308).
- A written WHS management plan before work starts (r 309), and, so far as is reasonably practicable, everyone who is to carry out construction work on the project made aware of it before they start (r 310).
- All reasonable steps to get a copy of each safe work method statement before the high risk construction work starts (r 312).[2]

04 OFFICERS, BOARDS, AND COUNCILS

# 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)).[1] The Act defines an officer by reference to the Corporations Act, and to officers of the Crown and of public authorities.[1] Whether each member is one depends on the body and the role. Our view: a school board, a system's executive, and a university council should plan as if their members are officers.

## Due diligence includes taking reasonable steps to:

| The model WHS Act, section 27(5)[1] | What it can look like for contractors on a campus (our examples) |
|---|---|
| (a) Acquire and keep up to date knowledge of WHS matters | A briefing when the state changes its working with children or notification rules |
| (b) Understand the operations, and their hazards and risks | Knowing which buildings are older, which hold asbestos, and when the holiday works run |
| (c) Make sure the business has, and uses, appropriate resources and processes to eliminate or minimise risks | A funded contractor process, used at every school, not only the large ones |
| (d) Make sure it has appropriate processes to receive and consider information on incidents, hazards, and risks, and to respond in a timely way | Contractor incidents and near misses reported to the same place as staff ones |
| (e) Make sure it has, and implements, processes for complying with its duties, such as reporting notifiable incidents | A written route for who notifies the regulator, and who tells the school |
| **(f) Verify that the resources and processes in (c) to (e) are provided and used** | **A regular report that shows the checks happened, not only that the policy exists** |

### What a board or council can ask for.

- Contractors engaged this term, and how many were checked before their first visit.
- Working with children checks and licences due to lapse in the next 30 days, or suspended or changed since the last report, by school or campus.
- Asbestos registers reviewed before this year's holiday works, and given to the trades.
- Incidents and near misses involving contractors, and what changed.

### Volunteer board members.

Many school boards are unpaid. The model Act says a volunteer does not commit an offence under its offence provisions for failing a health and safety duty, except the duties of workers and other persons at a workplace (section 34(1)).[1] Our reading: that removes the offence, not the duty, so a volunteer officer still carries due diligence.

**In Victoria** The OHS Act 2004 (Vic) takes "officer" from section 9 of the Corporations Act (s 5(1)) and has no due diligence duty like the model Act's section 27. An officer of a body corporate commits an offence where the body's contravention is attributable to the officer's failure to take reasonable care (s 144(1)), but a volunteer officer cannot be prosecuted under that section for what they do as a volunteer (s 144(5)); the workplace manslaughter offence also reaches officers who are not volunteers (s 39G(2)).[4]

05 STATE BY STATE

# One set of model laws, real differences.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws." It adds that, in some instances, states and territories have also made more substantial variations.[3] A system or university with sites in more than one state meets each state's law, and its own department's or system's rules on top.

| What | The law | What it means across several states |
|---|---|---|
| **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 has, to any extent, the management or control of 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, but only for matters it manages or controls (s 26).[4] | The section 23 duty reaches students, visitors, and anyone else who is not the employer's own employee; its own staff, and the contractors it engages and their employees, are covered by section 21. Hold a Victorian school or campus to the same discipline, checked against Victoria's own Act and Regulations. |
| **Every other state and territory** | Each jurisdiction's own version of the model WHS Act and Regulations.[3] In NSW, SafeWork NSW says the Work Health and Safety Regulation 2025 commenced on 22 August 2025, and that its provisions are now called sections.[8] | Mostly the same duties, but check each jurisdiction's own text and numbering before quoting it. |
| **Asbestos register** | Model Regulations: applies to buildings whenever constructed; a building is exempt only if it was constructed after 31 December 2003 and no asbestos has been identified or is likely to be present (r 425(5), (6)).[2] Queensland's date is 31 December 1989.[6] Victoria's rules apply wherever asbestos is present, with the register reviewed at least every 5 years (rr 225 and 228(2)).[5] | Older schools and campuses in every state should expect a register. Page 13. |
| **Incident notification** | The model Act as at 5 December 2025 adds new categories, but Safe Work Australia says the changes "only apply if adopted under local WHS laws".[11] In Victoria, a written record follows within 48 hours of every notification (s 38(3)).[4] | Use your own state's current rule. Page 19. |
| **Working with children** | A different law, name, and term in every state and territory.[12, 17, 23] | Page 10 sets them side by side. |

## Where the principal contractor rules start.

Each figure is "or more"; the same works can cross the line in one state and not another.

### AU$250,000

**Model laws and NSW.**

A construction project: AU$250,000 or more under the model Regulations and, says SafeWork NSW, in NSW. Victoria's AU$350,000 is for its principal contractor rules (beside).[2, 9]

### AU$350,000

**Victoria.**

The principal contractor rules apply from AU$350,000 (r 332(1)). Below that, a project is still a construction project in Victoria, with no principal contractor.[5]

### AU$450,000

**South Australia.**

AU$450,000 or more. The same refurbishment can make the school its principal contractor in one state and not in another.[7]

**Meet both.** A state education department's, a Catholic system's, or a university's own contractor rules sit on top of the law. They set different things, not a stronger and a weaker version of one thing, so ask for them before the first job and meet the law and the rules.



06 WORKING WITH CHILDREN

# Who needs a working with children check.

Every state and territory runs its own check, under its own law, with its own name and term. Each decides which work is child-related, and most treat contact that is only incidental to the work as outside it. Then the school, the department, or the system may ask for more.[12, 17, 33, 36, 39] For a facilities team, the hard part is not the law: it is knowing which rule applies to which contractor, at which school, on which day.

## 06 WORKING WITH CHILDREN

| | The check, and who runs it | Cleaners and trades, in the regulator's words | What the education department adds (government schools) | Lasts |
|---|---|---|---|---|
| **NSW** | Working With Children Check, Office of the Children's Guardian. Employers verify it online, in the education sector by clearance number rather than application number, and the person verifying cannot verify their own check. [12, 13] | Providing cleaning services to a school needs a check; a tradesperson who may incidentally come into contact with children, but is not working with them, does not. [12] | Every contractor a school engages directly, and every School Infrastructure contractor at an operating school, has identity verified, a Not to be Employed check, and a valid clearance before starting; School Infrastructure adds a national criminal history check where required. No clearance is needed on a site not yet operating as a school. Trainees and apprentices under 18: no clearance, but a criminal history check. Work experience under 18: supervised at all times by a holder. Callout contractors show a valid national criminal history check and a paid WWCC at the office; school cleaners are child-related workers. [14, 15] | 5 years [12] |
| **Vic** | Working with Children Clearance, Social Services Regulator. From 19 October 2026, mandatory child safety training is part of every new application, every renewal, and every change from a volunteer to an employee clearance. [18, 49] | State and non-government schools are child-related settings; the regulator's example treats a plumber's contact with children at a junior sports clubroom as incidental to the work. [17] | Child-related work needs a clearance; other work at a school while children are present is "child-connected", and a school may require a clearance or another check for it. For an agency's own staff, the Department's example puts checking and connecting on the agency, with the school also checking the clearance; agree in the contract who does what. A tradesperson's visit stays on the visitor register for 7 years. [20] | 5 years [19] |
| **Law, Vic** | Every organisation or person, not only schools: from 19 October 2026, whoever engages a person for child-related work must check the clearance, connect them in WWC Connect within 7 days (21 for a volunteer), update it when they stop, and keep the evidence and engagement records for at least 7 years after it ends; it is told of a suspension or revocation. For work that is not child-related, connecting is optional, and the regulator says the person's consent should be sought (Worker Screening Act 2020 (Vic), as the regulator describes it). Engaging a person in work you know is child-related, knowing or reckless as to whether they hold a current clearance: up to 240 penalty units (AU$50,184 from 1 July 2026) or 2 years' imprisonment, or both; a body corporate up to 1,200 penalty units (AU$250,920). [48] | | | |
| **Qld** | Blue card, Blue Card Services. [23] | A school cleaner and a groundskeeper need one; a tradesperson with only incidental contact with students does not. Maintenance inside an outside school hours care service or kindergarten while children are there needs one, unless exempt: no more than 7 days of such work in a calendar year, though not for a business owner or operator, or a restricted person. [23, 24] | A valid card before child-related work starts. A Work Area Access Permit, with the asbestos register attached, before maintenance or construction work. [26, 27] | 3 years [25] |
| **WA** | Working with Children Check, Department of Communities. [28] | School cleaners and gardeners fall in the school category; most contractors are not doing child-related work and are not eligible for a check, and an organisation's policy cannot override the Act. [28, 29] | Contractors not doing child-related work sign a confidential declaration before access, and sign in at reception. [31] | 3 years [30] |

NSW, Victoria, and Queensland re-read 10 November 2026; the other rows read 5 November 2026. Non-government schools and universities set their own rules; the department column is a guide, not a rule for them. South Australia to the Northern Territory: page 11.

06 WORKING WITH CHILDREN, CONTINUED

| | The check, and who runs it | Cleaners and trades, in the regulator's words | What the education department adds (government schools) | Lasts |
|---|---|---|---|---|
| **SA** | Working with Children Check, DHS Screening Unit. [33] | Needed from age 14 for child-related work on more than 7 days a year, any child-related work involving an overnight stay, or close personal contact with a child with a disability; a person who runs a business whose workers do child-related work needs one too; contact that is incidental is not child-related work. [33] | Contractors providing services on a department site hold one, even where the Act does not require it, verified online: sighting the outcome email is not enough. [34] | Renewed every 5 years [34] |
| **Tas** | Registration to Work with Vulnerable People, Department of Justice. [36] | Needed for a regulated activity, education included, where contact with children is a normal part of the duties; incidental contact is not. [36] | Contracts require contractors and subcontractors to hold registration, and they sign in with it at the kiosk or sign-in sheet. [38] | 5 years [37] |
| **ACT** | Working with Vulnerable People registration, Access Canberra, under the Working with Vulnerable People (Background Checking) Act 2011 (ACT). [39] | Schools are a regulated activity; contact that is only incidental, such as working in the same building with no contact, is exempt. [39] | Ask the Education Directorate for its contractor rules before the first job. | 5 years [40] |
| **NT** | Working with Children Clearance, the Ochre Card, NT Screening Authority with SAFE NT (NT Police). A worker and the person who engages them may each be fined up to AU$97,000 (500 penalty units at AU$194, from 1 July 2026) for child-related work without a clearance in force. [41] | Read the NT's definition of child-related employment for the role. | The Department's clearance policy applies to contractors in all school workplaces. [42] | 2 years [41] |

Read 5 November 2026; renewal rules re-read 10 November 2026.

## A current status, not just an expiry date.

A card in date can still be suspended, barred, or under renewal. Three habits keep the check current.

### Check the status

Identity, paid or volunteer, any conditions, and the date and outcome of the check with the agency, not a card's expiry date alone (page 12).

### Act on a notice

In Victoria, from 19 October 2026, WWC Connect tells a connected organisation of a suspension, interim bar, exclusion, revocation, or expiry. After a suspension, bar, exclusion, or revocation, stop the person's child-related work at once; after an expiry, the WWC status checker says whether they may keep working while a renewal is decided. [48]

### Know the renewal rule

In South Australia, a worker who completed an application before the check expired may work on re-application while it is finalised, if the Screening Unit says they are eligible and the organisation allows it. In the ACT, a renewal lodged before expiry keeps the registration valid until it is decided. [33, 40]

Our view: a check from another state, a pending renewal, or a new card is current only when that scheme's rule says so; a reminder is not an approval.

06 WORKING WITH CHILDREN

## Decide it by role, before the first job.

Three questions, in order, for each contractor role at each school.

**Is it child-related work here, under the state or territory's law?**
Read the state's own definition against the role, not the company. A school cleaner and a once-a-year lift technician can land on different sides, and in Queensland the same plumber can need a blue card anywhere in an outside school hours care service, its grounds included, while children are there, and not in the staff car park. [23, 24]

Yes → **The state or territory's check,** where its law requires one for that work (page 10). Held by that worker.

And

**What does the school ask on top?**
Your department, system, or own policy may ask more than the law, as NSW, South Australia, and Tasmania do for government schools. [14, 34, 38]

Yes → **The check the policy asks for.** Except in WA, where it cannot: a check is not available to most contractors. [28]

Then

**Who verifies it, and when?**
A check is verified with the issuing agency, not by looking at a card.

How → **With the issuing agency.** NSW employers must verify each check online; South Australia's department says sighting the outcome email is not enough; Queensland requires organisations to link card holders before they start. [13, 34, 46]

## A check is not supervision, and supervision is not a check.

Victoria's education department puts it plainly: "An activity may be 'child-related work' regardless of whether another person supervises the contact with a child." [20] The reverse also holds. A cleared contractor working in an occupied school still needs the supervision the work calls for, so far as is reasonably practicable (model Act section 19(3)(f); in Victoria, the employer's duties under sections 21 and 23 of its own Act). [1, 4]

### On a university or TAFE campus.

The check follows the children. In Victoria, TAFEs are listed as child-related settings where they provide VCE or the Victorian Certificate of Applied Learning (the regulator's wording). [17] Our view: map where children are (a childcare centre, a holiday program, residences with students under 18). Before work in a laboratory, workshop, animal facility, clinical area, or residence, add a local sign-off: hazards disclosed, the area made safe, services controlled, a handback.

### What to record for each worker.

NSW's regulator lists what an employer keeps: full name, date of birth, check number, verification date and outcome, expiry date, and whether the work is paid or voluntary. [13] A good list for any state, held against the person and the schools they attend, with any conditions, and checked again on a notice or a renewal (page 11).

**Reportable conduct reaches contractors.** In NSW, the reportable conduct scheme counts as an employee any contractor who holds, or is required to hold, a Working With Children Check for the engagement, and it applies to government and non-government schools. [43] Victoria's scheme applies to contractors as well as employees and volunteers. [44] Page 19 covers what to do if a concern is raised.



07 OLDER BUILDINGS

# The asbestos register belongs in the trade's hands.

Much of Australia's school and university estate was built long before asbestos was banned. Under the model Regulations, the person with management or control of a workplace must ensure, so far as is reasonably practicable, that all asbestos at the workplace is identified by a competent person, or assume it is present, and must ensure that a register is prepared and kept there (r 422, r 425).[2] A register in a locked office protects nobody.

07 OLDER BUILDINGS

## Six moments when the register matters.

Each row gives the moment, what the model Regulations require then, and the check to make.

| When | What the model Regulations require | What to check |
|---|---|---|
| **Every day** | The register is readily accessible to workers who carry out, or intend to carry out, work at the workplace, their health and safety representatives, and businesses that carry out or require work there (r 427(1)). [2] | The trade can see it before the job, not after |
| **When the work risks exposure** | A business whose work involves a risk of exposure to airborne asbestos must be given a copy of the register (r 427(2)). [2] | The copy given, with its version and date |
| **Where nobody can look** | If part of the workplace is inaccessible and likely to contain asbestos, assume it is present (r 422(2)(b)). [2] | Ceiling spaces, wall cavities, and under floors the survey could not reach |
| **Before refurbishment** | For a structure built before 31 December 2003, the register is reviewed, and revised if it is inadequate for the proposed work; the business carrying out the work is given a copy before it starts (r 447, r 448, r 449). The Regulations' own example: an inaccessible area likely to contain asbestos that the work will open up. [2] | Does the register cover the exact area the job will open? |
| **If suspect material turns up** | Material a competent person reasonably believes is asbestos is assumed to be asbestos (r 422(2)(a)); the register is reviewed when further asbestos is identified or asbestos is disturbed (r 426(b), (c)); and construction work likely to disturb asbestos is high risk construction work (r 291(d)). [2] | Stop, keep people out, note the areas and the people affected, call the school's asbestos contact |
| **Before the area reopens** | After licensed asbestos removal, the business that commissioned it ensures a clearance inspection by an independent licensed asbestos assessor or independent competent person, and a written clearance certificate is issued before the area is re-occupied (r 473, r 474). [2] | Students return on the clearance certificate, not on the permit or work order closing |

## What the education departments say.

These departments add their own asbestos steps for contractors; read your own before the first job.

### NSW.

School asbestos registers are available online, and maintenance contractors must review the asbestos management plan and register before attending the site and starting any works. [15, 16]

### Queensland.

A Work Area Access Permit is needed for maintenance and construction work whether or not it is meant to disturb asbestos, and the register is attached to it. [26]

### SA, WA, and Victoria.

South Australia: all contractors review the register before any works, as part of induction. Western Australia: the register is kept at reception and read before any work. Victoria: the location of asbestos is shared with contractors where relevant. [35, 32, 22]

**A register is not a guarantee.** Our view: treat the register as the start of the conversation. Confirm it covers the exact ceiling, wall, or floor the job will open, record which version the trade saw, and agree before work starts who they call if they find something the register does not show.

08 HOLIDAY WORKS

# Six weeks to do a year's work.

The summer break is when roofs are replaced, air conditioning goes in, ceilings come down, and classrooms are refitted. Most of it is construction work, and much of it is high risk.

The model Regulations define construction work as "any work carried out in connection with the construction, alteration, conversion, fitting-out, commissioning, renovation, repair, maintenance, refurbishment, demolition, decommissioning or dismantling of a structure" (r 289(1)), including installing, testing, or maintaining an essential service (r 289(2)(e)). Testing, maintenance, or repair work of a minor nature is not (r 289(3)(d)).[2]

## High risk construction work needs a safe work method statement.

Before high risk construction work starts, the business carrying it out must ensure a safe work method statement is prepared, and it is needed at any project value (r 299(1)).[2] These six turn up most in holiday works.

**Roofs**
### A fall of more than 2 metres
Roof plant, gutters, skylights, and high ceilings in halls and gyms (r 291(a)).

**Air conditioning**
### Refrigerant lines
Work on or near chemical, fuel, or refrigerant lines (r 291(j)).

**Electrical**
### Energised installations
Work on or near energised electrical installations or services (r 291(k)).

**Ceilings and walls**
### Asbestos
Work that involves, or is likely to involve, disturbing asbestos (r 291(d)).

**Plant rooms and pits**
### Confined spaces
Work in or near a confined space (r 291(f)); entry needs a written permit (r 67).

**Refits**
### Structural changes
Alterations that need temporary support to prevent collapse (r 291(e)).

## Below 2 metres, falls are still managed, in this order.

1. **Ground first.** On the ground or a solid construction, so far as is reasonably practicable (r 78(3)).
2. **Prevention.** Otherwise, fall prevention first.
3. **Positioning.** Then a work positioning system.
4. **Arrest.** Then fall arrest (r 79(3)).[2]

The risk of any fall from one level to another that is reasonably likely to cause injury must be managed, whatever the height (r 78(1)).[2]

## Hot work, fire systems, and dust.

We recommend the school's own permits for the first two; silica dust has rules in the model Regulations.

### Hot work.
No single model regulation sets a hot work permit. Our recommendation: the school's own permit for welding, brazing, and cutting, a fire watch, and detector isolations approved and reinstated.

### Fire systems.
Our recommendation: no alarm, sprinkler, or detector isolated without approval; each isolation logged and confirmed back on before anyone returns.

### Dust and silica.
Under the model Regulations Safe Work Australia published as at 5 December 2025, power-tool cutting, drilling, or grinding of concrete, brick, or tile holding 1% or more crystalline silica is processing a crystalline silica substance (r 529A). It must be controlled (r 529C) and assessed for whether it is high risk (r 529CA); high risk processing needs a silica risk control plan first, unless it is also high risk construction work and a SWMS that meets the plan's requirements is prepared first (r 529CB).[2] Keep the dust out of occupied air systems.

09 AROUND STUDENTS, AND AFTER HOURS

# Schools are never really empty.

Term time brings children past the works. The holidays bring vacation care, sport, and summer schools. Nights bring cleaners, security patrols, and the on-call electrician. The question is the same at 6am, 3pm, and 2am: who is this, are they cleared for here, and who knows they are here?



## Keep the works and the children apart.

A person with management or control of a workplace where construction work is carried out must ensure, so far as is reasonably practicable, that it is secured from unauthorised access, having regard to the risks, the likelihood of access, and how to isolate hazards where access cannot be prevented. The model Regulations' own example of a relevant matter: "The proximity of the workplace to places frequented by children, including schools, parks and shopping precincts" (r 298).[2] In Queensland, maintenance inside an outside school hours care service or kindergarten while children are there ordinarily needs a blue card, subject to the exemptions on page 10.[24]

## Sign in at the front office, every time.

Departments say it in their own words: in NSW, maintenance contractors report to the school office on arrival, follow its sign-in procedure, and produce their screening evidence before work; in Victoria, contractors sign in and out at reception or the work area and complete induction documents before work; in WA, the sign-in record holds name, company, contact, purpose, and arrival and departure times.[15, 21, 31]

Whatever the department's wording, every sign-in should show these four things.

**Expected.**
The visit is booked, and the office or the patrol can see it.

**Cleared for here.**
Checks, licences, and induction read against this school, not the last one.

**Not alone without a way to call.**
A named person watches a lone worker's check-ins, a missed one is followed up, and there is a fallback where the phone has no signal.

**Signed in and out.**
So the roll call in an evacuation includes them.

**Child safe conduct**

Our recommendation: in the induction, stay in the authorised area; no photographs of students, and no personal contact or messages; secure tools, keys, and doors; tell staff before entering an occupied space; report a concern at once to the school's named person, who protects the child and reports it, and do not question the child. NSW's Child Safe Standards apply to schools, the Department, and the TAFE Commission.[52]

**Good practice, and one rule.** No one provision says "escort every contractor past a classroom". The duty to provide supervision (section 19(3)(f)), the duty to other persons (section 19(2)), and the emergency plan every workplace needs (r 43) point the same way. Work isolated from the assistance of others by location, time, or the nature of the work needs a system of work that includes effective communication (r 48).[1, 2]

10 AUTHORISING AND CONTROLLING THE WORK

# Let in is not the same as authorised.

Signing in at the front office lets a contractor onto the site. It does not authorise them to open the ceiling above the library, isolate the fire panel, or climb onto the hall roof. That takes a second step before the tools come out, and a handback before students or staff return.

| Control | What it means on a school or campus | Status and source |
|---|---|---|
| **Task risk assessment** | The job, the area, and the students, staff, and visitors nearby assessed before work starts, and the controls agreed, not left to the trade on arrival. | LAW eliminate or minimise risks so far as is reasonably practicable (model Act ss 17 and 19; Regulations Part 3.1 where a regulation applies it) [1, 2]<br>GOOD PRACTICE the written assessment |
| **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, that is or is likely to be a risk from its atmosphere, contaminants, or engulfment. A tank, pit, or duct is one only if it meets all of that. Entry needs a written permit, and also continuous communication and a standby person; risks from connected plant and services eliminated or minimised, and the space purged or ventilated, so far as is reasonably practicable; a safe oxygen level, or air-supplied respiratory equipment where that is not reasonably practicable; and rescue procedures that are practised. The permit records these controls; it does not replace them. | LAW the definition, r 5; the permit, r 67; the controls, rr 69 to 71 and 74 [2]<br>GOOD PRACTICE the permit form |
| **Other permits and isolations** | Hot work, roof access, ceiling spaces, and isolating power, water, gas, or a fire system, each with a named person who issues the permit, checks the isolation holds, and closes it. | LAW risks eliminated or minimised so far as is reasonably practicable, with isolation among the controls, Part 3.1 (r 35, r 36); no electrical work on energised equipment except as r 157 allows, r 154 [2]<br>GOOD PRACTICE the school's permit forms |
| **Read the SWMS against the job** | For high risk construction work, a safe work method statement before work starts (r 299), with a principal contractor, where there is one, taking all reasonable steps to get a copy first (r 312). Once there is one, the work must follow it: if it does not, it stops immediately, or as soon as it is safe to stop (r 300). | LAW r 299, r 300, r 312 [2] |
| **Roof and heights** | Roof access controlled, skylights and fragile roofing protected, and any fall that is reasonably likely to cause injury managed, whatever the height (page 15). | LAW r 78 [2]<br>GOOD PRACTICE the roof access permit |
| **Fire system isolation** | Approved in advance, kept short, logged, and confirmed back on before staff and students return (page 15). | LAW an emergency plan for the workplace, r 43 [2]<br>GOOD PRACTICE the isolation steps |
| **Work-area protection and supervision** | Barriers and signs; students, staff, and visitors kept clear; tools and materials secured; exits and fire doors kept free; and supervision matched to the work and the children nearby. | LAW s 19(2) and s 19(3)(f); a construction workplace secured from unauthorised access, r 298; each so far as is reasonably practicable [1, 2] |
| **Handback** | The area inspected and cleaned, services reinstated and tested, the fire system confirmed on, penetrations sealed, any asbestos clearance certificate issued (page 14), and the permit closed, before students or staff return. | LAW people returning not put at risk, s 19(2), and the workplace without risks, s 20(2), so far as is reasonably practicable; clearance after licensed asbestos removal, r 474 [1, 2]<br>GOOD PRACTICE the handback form |

10 AUTHORISING AND CONTROLLING THE WORK

## One job, four stages, controlled throughout.

Every job runs through the same four stages, whoever the contractor is. From authorisation to handback, a named person is responsible for the work while it runs, and checks it against what was authorised.

1
### Requested.
The job, the area, the contractor, and who is nearby.

2
### Assessed.
Risks, permits, isolations, any SWMS, the asbestos and child safety checks.

3
### Authorised.
By whoever controls the area; the school told.

4
### Handed back.
Checked, reinstated, signed off, record closed.

## What one authorisation records.

Each field, and who fills it in: together, who was allowed to do what, where, and when it was handed back.

| | Field | Filled in by |
|---|---|---|
| ☐ | The job, the area, the date and hours, and the contractor and each worker | Requester |
| ☐ | Working with children checks, licences, and induction checked for each worker, for this school or campus (page 21) | Contractor coordinator |
| ☐ | The risk assessment, and any SWMS, permit, or isolation, by number | Contractor and permit issuer |
| ☐ | The asbestos register checked for this exact area, and a copy given if the work risks exposure | Business manager or facilities |
| ☐ | Any fire isolation: approved by, time out, time reinstated and tested | Fire services contractor and business manager |
| ☐ | Classes, programs, and other contractors affected: who was told, and what they agreed | Principal or campus manager |
| ☐ | Handback: area checked, services reinstated, penetrations sealed, signed off, permit closed | Business manager or facilities |

## Two rules that keep it controlled.

### Anyone can stop the work.
Make it a contract term and a line in the induction: a business manager, a security officer, a teacher, or the contractor's own worker who sees work running outside what was authorised can stop it, and the person who authorised it decides what happens next. For high risk construction work not done to its SWMS, stopping is the law.[2]

### When the job changes.
A bigger job than the one authorised is a new job: assess it again and re-authorise it. Asbestos is the common case: if suspect material appears in a ceiling the register did not cover, the work stops (page 14). A routine service that turns into a unit replacement may now be construction work (page 15).

11 WHEN SOMETHING GOES WRONG

# One event, several reports.

A contractor falls through a skylight in January, a cleaner disturbs suspect material, a parent raises a concern about a contractor: one event can start more than one report, each with its own clock and owner.

### WHS notifiable incident

A death, a serious injury or illness, or a dangerous incident (section 35). The business notifies the regulator immediately after becoming aware of it, by the fastest possible means; gives a written notice within 48 hours if the regulator requires one; and keeps a record for at least 5 years (section 38). The person with management or control, so far as is reasonably practicable, preserves the site until an inspector releases it, and preserves the evidence, except to assist an injured person, remove a deceased person, make the site safe or minimise the risk of a further occurrence, for a police investigation, or with an inspector's or the regulator's permission (section 39).

**Law** model Act, Part 3 [1]

**Immediately** The contractor and the school can both hold these duties. One may lead the notice, but each business with the duty stays responsible for it being met.

### The same, in Victoria

The employer or self-employed person with management and control of the workplace where the incident happened notifies WorkSafe immediately after becoming aware of it, gives a written record within 48 hours, and keeps a copy for at least 5 years; the site is not disturbed until an inspector arrives or directs otherwise, except to protect health or safety, aid an injured person, or take essential action to make the site safe or prevent a further incident (ss 38 and 39).

**Law** OHS Act 2004 (Vic) [4]

**Immediately; 48 hours** For a contractor hurt at a Victorian school, usually the school.

### The 2025 additions, where adopted

A violent incident (such as a physical or sexual assault that exposes a person to a serious risk of psychological harm), a serious fall of a person as a dangerous incident, and notifiable extended absences and suicides. Safe Work Australia says these "only apply if adopted under local WHS laws". The ACT adopted the serious fall and site preservation changes from 19 November 2025.

**Law** model Act ss 35A, 35B, 37(1)(m), 37A [1] **Regulator** SWA; WorkSafe ACT [11, 47]

**Where adopted** Check your own regulator's current list.

### Between the businesses

The contractor's employer, the school or system, and any other business on site. Where the 2025 model change is adopted, the business that must notify the regulator and the person with management or control of the workplace must each ensure the other is told (s 39A).

**Law** where adopted, s 39A [1] **Good practice** elsewhere

**Immediately** Where adopted, so far as is reasonably practicable; elsewhere, our recommendation too.

### Suspect asbestos disturbed

Where a competent person reasonably believes it is asbestos, it is assumed to be (r 422(2)(a)), and the register is reviewed (r 426(b), (c)); work that disturbs asbestos is prohibited except as the Regulations allow (r 419), and construction work likely to disturb it is high risk construction work (r 291(d)).

**Law** r 291, r 419, r 422, r 426 [2]

**Straight away** Stop, keep people out, call the asbestos contact; students stay out until a competent person has assessed the area and, where licensed removal was needed, a clearance certificate is issued (page 14).

### A concern about conduct towards a child

Both schemes reach contractors (page 12). NSW: the head of the relevant entity notifies the Children's Guardian within 7 working days of becoming aware of a reportable allegation, then gives an interim or final entity report within 30 calendar days. Victoria: the head of the organisation notifies the Social Services Regulator within 3 business days, with more detail within 30 calendar days. Not every complaint is a reportable allegation.

**Law** NSW and Victorian schemes, as their regulators state the deadlines [43, 44, 50, 51, 56]

**7 working days (NSW); 3 business days (Vic)** Police first where a crime is suspected; in Victoria, both Victoria Police and the SSR are told, and the organisation's own investigation waits for police.

**Who decides, at 2am.** Name an on-call manager for each school or campus who can stop work, call the emergency services, and decide who leads the regulator notice; name in the contract who reports what; and keep the incident, the notification, and what changed with the contractor's record.

12 A WORKED EXAMPLE

# Two weeks in the January holidays.

A government primary school in western Sydney, built in 1968. Over two weeks in January, a mechanical contractor replaces the library block's rooftop air conditioning and runs new ductwork through its ceiling, and an electrician isolates and reconnects the supply: AU$180,000 of construction work in all. Contract cleaners do the holiday clean, security patrols at night, and an outside provider runs vacation care in the hall.

| What is live | Why | What gets checked and kept |
|---|---|---|
| **The roof** | A risk of falling more than 2 metres, work near refrigerant lines, and work near energised electrical services are each high risk construction work (r 291(a), (j), (k)), so a safe work method statement is needed before work starts, and followed (r 299, r 300).[2] | The statement read against this roof; load, fragile areas, edge protection, access, and rescue checked on day one and kept in place; the brazing under a hot work permit, detectors back on before handback |
| **The crane lift** | A crane lifts the units onto the roof while vacation care runs. Any high risk work licence the crane needs is sighted first (r 85); the trades hold the NSW electrical and air conditioning licences their work needs.[2, 54, 55] | The lift plan, exclusion zone, and delivery route clear of the hall; licences checked |
| **The ceiling** | The block was built before 31 December 2003, so the register is reviewed before refurbishment and the contractor given a copy (r 448, r 449);[2] the Department asks maintenance contractors to review the register before attending.[15] Any inaccessible part likely to contain asbestos is assumed to (r 422(2)(b)).[2] | Register version, the ceiling space it covers, and the date given |
| **The project** | At AU$180,000 for all the construction work on the project, not one package of it, it is under the AU$250,000 construction project threshold SafeWork NSW gives (in Victoria, the principal contractor rules start at AU$350,000), so there is no principal contractor.[9] Each business still holds its own duties, and must, so far as is reasonably practicable, consult, co-operate, and co-ordinate with the others (section 46).[1] | Who co-ordinates the four contractors, written down |
| **The children** | Vacation care brings children onto an operating school. Whether the school or School Infrastructure engages them, the Department asks each contractor for verified identity, a Not to be Employed check, and a valid clearance before starting.[14] The works must be secured from unauthorised access, so far as is reasonably practicable, with places frequented by children a relevant matter (r 298).[2] | Clearances verified per worker; the works zone fenced; deliveries kept off the hall's path |

Section and regulation numbers are the model laws'. In NSW, the Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW) apply; SafeWork NSW says the Regulation's provisions are now called sections, so check the NSW numbering before quoting it.[8]

## The same fortnight, on paper and joined up.

The same roof and ceiling job, twice: once with the checks on paper, once with them joined up.

### On paper.

The business manager is on leave. At 7am the technician signs a paper book at the side gate, and nobody checks his clearance. The register sits in the office, vacation care staff do not know a crane is due, and the detectors stay isolated all weekend.

### With the checks joined up.

The contractor and its technicians were checked against this school's rules when engaged. He signs in on his phone at the gate, sees the ceiling's register and the vacation care hours, and the brazing permit is approved before he lights a torch. Where the school is set up that way, anyone not cleared is stopped, and the handback cannot close with an isolation still open.

13 THE RECORD

# What to hold for every contractor.

LAW an Act or Regulations: the duty, not always its form

REGULATOR a regulator's guidance

POLICY a department rule that binds that department's schools, or a contract term that binds you

GOOD PRACTICE not itself a legal requirement

| Level | What to hold | Status and source |
|---|---|---|
| **The company** | Selection criteria and the evidence asked for: safety records, incidents, notices, and prosecutions | REGULATOR WorkSafe Tasmania [45] |
| | Workers compensation cover for the people they send, not only a certificate, and public liability insurance, with expiry dates | POLICY Victorian Department of Education (workers compensation and public liability insurance reviewed before works begin); [21] GOOD PRACTICE (who the cover reaches, expiry dates) |
| | The contract: WHS roles, who screens whom, who gives the trades the asbestos register, permits, incident reporting, and telling you when they are on site | REGULATOR WorkSafe Tasmania (WHS roles, incident reporting, telling you when they are on site); [45] POLICY Tasmanian Department (who screens whom); [38] GOOD PRACTICE (the asbestos register and permits) |
| **The worker** | A working with children check where the state's law or your policy requires one: number, expiry, conditions, the date it was verified and the outcome, re-checked on a notice or renewal (page 11). Victoria, for child-related work: connected in WWC Connect within 7 days (21 for a volunteer), disconnected when they stop, and the evidence kept for at least 7 years after the engagement ends. NSW government schools: who confirmed identity, the Not to be Employed check, and any national criminal history check | LAW each state's check, page 10; Vic WWC Connect; [12, 48] REGULATOR NSW record list; [13] POLICY NSW Department [14] |
| | Written evidence of any high risk work licence, sighted before the work, and a record kept for at least 1 year after the high risk work is carried out | LAW r 85(1) and (4) [2] |
| | General construction induction training for construction work, with the 2-year rule | LAW r 317 [2] |
| | A licence for the trade where the state's law requires one, such as electrical or air conditioning work in NSW, checked for class and current status; other qualifications for the task | LAW state trade licensing, for example NSW; [54, 55] REGULATOR WorkSafe Tasmania (other qualifications) [45] |
| **The site** | A site induction, including emergency procedures, hazards, and child safe conduct, before they start | LAW information, training, and instruction that fit the risk, r 39; [2] POLICY NSW and Victorian departments (the induction); [15, 21] GOOD PRACTICE (child safe conduct) |
| | The asbestos register accessible; a copy given where the work risks airborne exposure, and before refurbishment | LAW r 427; refurbishment, page 14 [2] |
| | A safe work method statement for high risk construction work, and permits: confined space entry in writing; hot work, roof, ceiling, and isolations by the school's own | LAW page 17 GOOD PRACTICE other permits |
| **The visit** | Sign in and out at the front office or gate, by school or campus and building | POLICY NSW, Victorian, and WA departments [15, 21, 31] |
| | Supervision proportionate to the work and the children nearby | LAW so far as is reasonably practicable, page 17 [1] |
| | Consultation with the other duty holders, and with affected workers and their representatives | LAW s 46, s 47, s 48(2) [1] |
| | The handback: isolations reinstated, area cleaned and inspected, any asbestos clearance issued, signed off | LAW page 17 GOOD PRACTICE the sign-off |

13 CHECKLIST

# Before a contractor starts.

| | Check | Owner | Date checked |
|---|---|---|---|
| **Know who holds the duty** | | | |
| ☐ | We know who manages or controls each building, including space leased to others, and the FM contract says who checks and who screens.<br>**Good practice** the campus works map, page 24 | | |
| ☐ | Each contractor role is classified against the state's working with children law and our own policy, and why, with a named owner, reviewed when a regulator's or department's rule changes.<br>**Law, each state's check, page 10** **Good practice (named owner, review)** the role list, dated | | |
| **Before engagement** | | | |
| ☐ | The company was assessed against clear selection criteria, including its safety record.<br>**Regulator** **Good practice, reviewed on a change** the prequalification, dated | | |
| ☐ | Workers compensation covers the people they send, not only a certificate; public liability is current; and each trade licence the state's law requires is checked for class and current status.<br>**Law, state trade licensing, page 21** **Policy, Victorian Department (insurance)**<br>**Good practice (who the cover reaches)** certificates, licences, status | | |
| ☐ | The contract says who gives the asbestos register, who issues permits, who connects workers in WWC Connect and receives status notices, and who notifies after an incident.<br>**Good practice** the clause | | |
| ☐ | For a construction project, we know who the principal contractor is, and have it in writing.<br>**Law, r 293; in Victoria, r 333: the owner, unless it appoints one and authorises it to manage or control the workplace (who it is)**<br>**Good practice (in writing); thresholds page 8** the appointment | | |
| **Before the first visit to this school or campus** | | | |
| ☐ | Every worker who needs a working with children check holds one, or a renewal its scheme allows, verified with the issuing agency, not sighted; in Victoria, connected in WWC Connect for child-related work; in NSW government schools, identity and Not to be Employed checks too.<br>**Law, each state's check** **Policy, NSW, page 10** **Regulator, verifying, pages 11 and 12** number, status, date verified, outcome | | |
| ☐ | Each worker has completed this site's induction, including emergency procedures, hazards, and child safe conduct.<br>**Law, training that fits the risk, r 39** **Policy, NSW and Victorian departments (the induction)**<br>**Good practice (child safe conduct)** completion, per worker | | |
| ☐ | The asbestos register has been seen, covers the area of the job, and a copy was given where the work risks exposure or is refurbishment.<br>**Law, r 427; refurbishment, page 14** register version and date given | | |
| ☐ | Construction workers hold a general construction induction card, or a certification issued in the last 60 days while the card is pending; anyone trained over 2 years ago did construction work in the last 2 years.<br>**Law, r 317** card numbers, and recent work | | |
| ☐ | We know when children will be on site, including vacation care and holiday programs, and the works zone is planned around them.<br>**Law, so far as is reasonably practicable, page 16** the site plan | | |

**Hold it carefully.** Check numbers, licences, and incident records are personal information. Keep each for the longest of the legal minimum (such as r 85(4), page 21), your government records rules, and any incident or claim hold. The Privacy Act's employee records exemption does not cover handling another organisation's employees' information, such as a contractor's workers.[53] Our recommendation: let the front office see a status, not the document, and keep screening details and any allegation about conduct towards a child behind tighter access.

13 CHECKLIST, CONTINUED

# On the day, and after.

| | Check | Owner | Date checked |
|---|---|---|---|
| | **On the day, at any hour** | | |
| ☐ | The visit was expected, and the office, the gate, or the night patrol could see it.<br>**Good practice** the booking | | |
| ☐ | Every worker signed in and out at the front office or gate.<br>**Policy, education departments** sign-in by school and building | | |
| ☐ | Any high risk work licence was sighted before the work, not after.<br>**Law, r 85** licence number, class, expiry | | |
| ☐ | A lone worker after dark is on a check-in system: a named person watches, a missed check-in is followed up, and there is a fallback without signal.<br>**Law, effective communication, r 48** the check-in log | | |
| | **Before the work starts** | | |
| ☐ | The task was assessed for this area today, including who is nearby.<br>**Good practice** the assessment | | |
| ☐ | A safe work method statement for high risk construction work was read against the job before work started.<br>**Law, page 17** the statement, version and date | | |
| ☐ | Permits were issued: confined space entry in writing; hot work, roof, ceiling space, and isolations by our own permit.<br>**Law, page 17** **Good practice, other permits** permit numbers | | |
| ☐ | Someone checked the work follows the statement, and knows they can stop it.<br>**Law, page 17** who checked, and when | | |
| | **Handback, and if something goes wrong** | | |
| ☐ | Isolations reinstated, the fire system confirmed on, any asbestos clearance issued, the area cleaned and inspected, and the handback signed before students return.<br>**Law, page 17** **Good practice** the handback, signed | | |
| ☐ | The contractor knows who to call at any hour, who leads the regulator notice, and who preserves the site; each business still meets its own duty. A concern about a child goes to the school's named person at once.<br>**Law, page 19** the incident route | | |
| | **Across every school and campus** | | |
| ☐ | Officers receive a regular report that verifies the checks happen, not only that the policy exists.<br>**Good practice; taking reasonable steps to verify is part of an officer's due diligence, s 27(5)(f)** the report, dated | | |

13 TEMPLATE

# The campus works map.

One row per school, campus, or building; the first row is an example. It settles, before the job starts, who may work where, what they must hold to work there, and who has to know.

| School and area | Who authorises work | Working with children check | Asbestos register | Permits needed | Children on site | After hours |
|---|---|---|---|---|---|---|
| *Example Primary, library block roof and ceiling* | *Business manager; principal for term-time work* | *Every contractor at an operating school: identity, Not to be Employed, and a valid WWCC (department)* | *Online; version checked before attending* | *Heights, hot work, ceiling space, isolations* | *Vacation care in the hall, January* | *Security patrol; side gate only* |
| | | | | | | |
| | | | | | | |
| | | | | | | |



## How to keep the map true.

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

### Fill it in with the schools.

Facilities, the principal or campus manager, and the WHS lead agree each row. A disagreement is a gap in who does what, and the duty does not wait for it to close.

### Review it before every break.

The holiday works change the map for six weeks. Decide in advance who updates it, and how the contractors and the holiday programs hear.

### Keep it with the record.

The map is only useful if the front office, the gate, and the night patrol can see it when a contractor turns up.

14 ONE STANDARD ACROSS EVERY SCHOOL

# The same standard at every front office.

Everything in this guide needs to work at every school and campus, in term and in the holidays.



## Questions to ask about how you manage it today.

1. If you were asked which contractors were at one school on a given day last term, how long would the answer take?
2. Which contractor roles need a working with children check under your state's law, which does your policy add, and is that written down?
3. Who verifies each check with the issuing agency, and who notices when it lapses?
4. When a contractor sends a new worker at 6am, is that worker checked before arriving, at the front office, or not at all?
5. Does the trade see the asbestos register for the exact ceiling space before work starts?
6. Who can approve a smoke detector isolation for hot work, and who confirms it is back on before students return?
7. During the holiday works, where are the children in vacation care, and who keeps the works apart from them?
8. How many hours a term go on chasing certificates and typing them into spreadsheets?

## What to look for in a system.

Seven capabilities that keep the checks in this guide working at every school and campus, in term and in the holidays.

- **One standard, each school's rules on top.** By contractor category and by site.
- **Checks that reach the worker.** Working with children checks where your policy requires them, licences, and inductions, held against each person with their status and expiry.
- **Contractors keep it current.** They upload once, from their phone, and every school measures them against its own list.
- **Expiry tracked for you.** A reminder before a check or licence lapses.
- **A front office and a gate that check.** Sign-in read against the school's requirements, with the asbestos register and site documents shown, and the version each person saw kept.
- **Permits on the same record.** Hot work, heights, and ceiling spaces raised, routed to an authoriser, and tied to the sign-in.
- **Connected, and visible to the board.** Work orders and access control linked, and every check, approval, and sign-in kept per site, with a name and a time.

START SMALL

### Start with the holiday works.

Take the schools with works booked for the next break, and run the checklist on pages 22 and 23 against their contractors. Close the gaps it shows first, and ask anyone offering a system to show each point above on your own sites.

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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 and Regulations 2017, each state's and territory's working with children scheme as its regulator describes it, the published policies of state and territory education departments, and regulator guidance, as read on the dates above. Each jurisdiction enacts its own WHS law, and its text and numbering can differ. Non-government schools, systems, and universities set their own contractor rules. For a decision about your own schools, campuses, and contractors, read the law in your jurisdiction and take legal advice. It is a guide to managing contractors, not a technical manual for asbestos, crane, roof, laboratory, or child protection work; read the specialist rules it names.

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