COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Energy and Renewables: the contractor compliance guide.

What Australian law asks of energy businesses when contractors work on their generation and storage sites, 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 as at 4 June 2026, its Definitions Rules as at 4 January 2023, and its risk management program Rules as at 10 June 2026; sources read on 14 and 17 November 2026

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

Covers
Wind, solar, battery storage, hydro, and gas-fired generation, from construction to operations, in every state and territory, Victoria and Queensland named

START HERE

The short version.

What is your business responsible for when contractors work on your energy sites, and what should you check before they start?

Most work on a generation or storage site is done by other businesses. The EPC contractor, the turbine technician, the crane crew, and the cleaner at the operations building all work under your duty.

1 **The owner or operator is the business, and contractors' workers are its workers too.** 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 **Some plant cannot be switched off.** Queensland's code of practice for solar farms says PV modules cannot be isolated and generate whenever light falls on them. The model Regulations treat every exposed part as energised until it is isolated and proved not to be (r 155; page 11).[2, 7]

3 **A harness needs a rescue behind it.** Where a fall arrest system is used, as in many turbine towers, the business sets emergency and rescue procedures, tests that they work, and trains the workers who use them (r 80; page 15).[2]

4 **A large generator can be critical infrastructure.** A station connected to a wholesale electricity market with an installed capacity of at least 30 megawatts, or contracted for system restart, is a critical electricity asset. Its risk program must identify critical workers, contractors included, and assess them before access (page 18).[9, 10, 11]

5 **Approved once is not checked today.** A contractor approved for the panel says little about the worker at turbine 14 today. Our recommendation: check each worker's licence, ticket, and competence for the task, at the site, before the work; for a high risk work licence, seeing it first is the law (page 3).[2]

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01 THE PRACTICAL TEST

The practical test is what you can show.

An owner approves a contractor once. Its people then work at turbines, inverters, and battery compounds the panel never sees. The question a regulator asks: who was on site, and what did they hold on the day?



An approved contractor is not a ready worker.

A common failure is a check that stops 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 (r 85).[2] A contractor on the panel since 2023 says little about the crane operator it sends today.

OUR RECOMMENDATION: ASSESSED ONCE, REVIEWED ON ANY CHANGE

The company

- ✓ Assessed for the panel or project, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Any accreditation or authorisation your site or the network requires, kept apart from each worker's licence
- ✓ Its workers compensation and public liability cover, and their dates (page 22)

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

Each worker, at each site

Turbine | Inverter station | Battery compound

- ✓ Any high risk work licence, of the right class and current, sighted before the work: that one is law[2]
- ✓ The electrical licence your state requires for the work, and the tickets the job needs, such as height rescue or confined space entry
- ✓ Inducted to this site, signed in, authorised for the task, and supervised to match the work

Where it can break.

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

A list per contract.
The build contract and the turbine service agreement each keep their own copy of the same certificates.

Checked by hand.
Expiry dates live in a spreadsheet, until a component exchange brings three crane crews in one week.

Sites with nobody there.
A wind or solar farm has no front desk. A book at the operations building says nothing about who is up turbine 14.

No view across the portfolio.
Nobody can say who is current on every site, or who worked on last month's inverter fault.

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



02 THE DUTY HOLDERS

The owner is the business.

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. A generator, a renewables owner, an EPC contractor, and a government-owned energy business are each one.[1] The duty reaches the cleaner at the operations building as surely as the turbine technician.

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

02 THE DUTY HOLDERS

Who the owner owes the duty to.

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

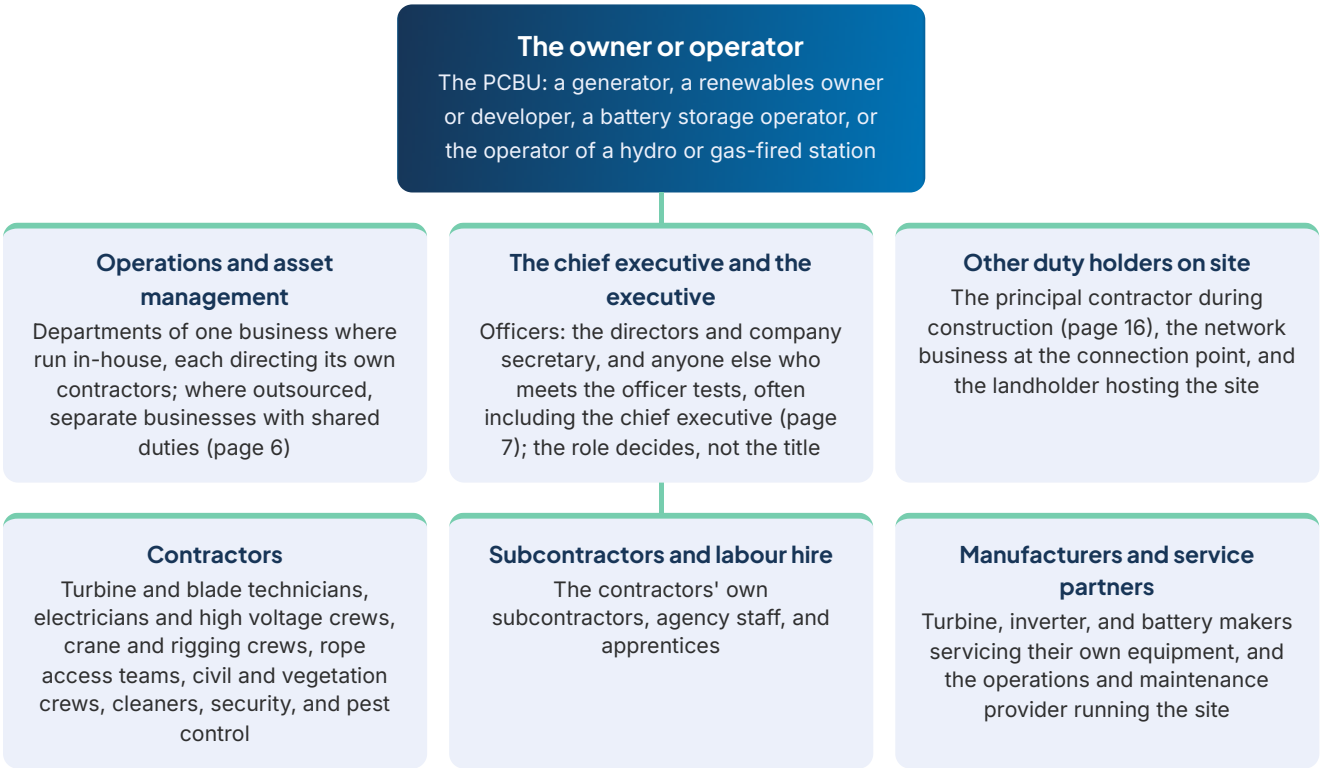
The business must ensure, so far as is reasonably practicable, the health and safety of workers "engaged, or caused to be engaged" by it, and of workers whose activities in carrying out work are "influenced or directed" by it (section 19(1)). That can reach a contractor's subcontractor the owner never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

Each site carries its own duty.

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

Who is on an energy site.

A common arrangement: the owner or operator at the top. Each organisation below it that is a separate business holds its own duties (page 6); each brings people onto the site and needs a place in your checks.

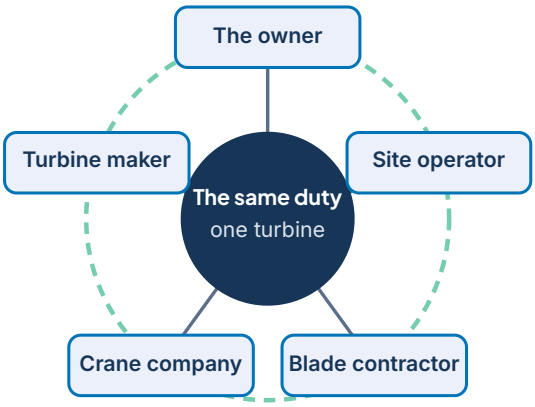


A remote site is not an exception. A crew driven in from another state for a major component exchange is a worker of the business that engages or directs it, like any other. Our recommendation: check every crew against the same record, at sign-in, before it reaches the turbine. Running a network or a water business instead? The rest of the series is at complyflow.com/ebooks-reports.

02 SHARED DUTIES

Shared, but never handed over.

A blade repair on a working wind farm puts the owner, the site operator, the blade contractor, the crane company, and the turbine maker at one turbine. 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 [13]

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 plant or a site changes hands. Each card is one of those moments, and what to settle in writing before it comes.

Construction to operations.

The principal contractor's control ends and the operator's begins. Settle the date, the open defects and limits, and whose permit system applies to each area in between.

The maker's own crew.

A turbine, inverter, or battery maker servicing its own equipment brings its own procedures to your site. Settle whose permits, isolations, and rescue plan apply, and how they meet yours.

The connection point.

Work at the site's substation can touch the network business's equipment. Settle who isolates what, who can refuse a return to service, and how the permits link.

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). What counts as a public authority is for your jurisdiction's Act.[1, 16]

Then

Name the officers by what they decide.

At an energy business, that can include the chief executive, the board, and the executives who run operations, asset management, and project delivery: 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). Each jurisdiction sets its own penalties: check yours.[1] 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, 14]

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 at an energy business. The last, verify, checks that what (c) to (e) put in place is provided and used.

a

Know.

Acquire and keep up to date knowledge of WHS matters.

At an energy business: a briefing when the state changes its electrical safety rules, or the critical infrastructure rules change.

b

Understand.

The operations, and their hazards and risks.

At an energy business: knowing which plant cannot be switched off, which towers rely on fall arrest, and which sites have nobody there.

c

Resource.

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

At an energy business: one funded contractor process, used on every site, during construction and operations alike.

d

Hear and respond.

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

At an energy business: contractor incidents, dropped objects, and near misses 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.

At an energy business: a written route for who notifies the WHS regulator, and who tells the electrical safety regulator where your state requires it.

f

Verify.

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

At an energy business: 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 site and contract, and how many were checked before their first shift.
- Licences, tickets, and rescue training due to lapse in the next 30 days, and any whose status changed (suspended, cancelled, or conditions added), by contractor.
- Live electrical work, lifts, and confined space entries authorised, how many were checked on site, and a sample of permits and SWMS compared with the work done.
- Incidents and near misses, which regulator was told, and the corrective actions still open past their due date.

04 WHERE THE LAWS DIFFER

One set of model laws, and a second layer.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws." [3] An energy business may also answer to its state's electrical safety law, which sits beside the WHS law, and offshore to a Commonwealth one.

Law	What it says	What it means for an energy business
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 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, for matters it manages or controls (s 26). [4]	The Electricity Safety Act 1998 (Vic) also applies. An installation with an installed generation capacity of 1000 kVA or more is a complex electrical installation: its owner or operator must design, construct, operate, maintain, and decommission it to minimise, as far as practicable, the hazards and risks to any person's safety, the risk of damage to property, and the bushfire danger (ss 3, 75(1)). Energy Safe Victoria may permit it to submit an electricity safety management scheme; once accepted, the owner or operator must comply with it, and so must an employer of electrical workers whose work it covers (ss 116, 118). [6]
Queensland	The WHS Act and Regulations, plus the Electrical Safety Act 2002 (Qld). A generation entity is an electricity entity, which must ensure its works are electrically safe and operated in a way that is electrically safe, including inspecting, testing, and maintaining them (s 29; sch 2), and every business must be conducted in a way that is electrically safe (s 30). [5]	Electrical work is licensed, and a business whose own work includes electrical work, and that engages others to do or supervise it, keeps a register of licensed workers (s 57AB(1); page 12). The Act's safety management system duty is for prescribed electricity entities, and a generation entity cannot be one (ss 66, 67). [5] Queensland's WHS Regulation does not use the model's electrical rules: its Part 4.7, sections 145 to 166, is "not used". [19] Its own Electrical Safety Regulation covers the same ground with its own numbering, and in places goes wider, such as work near energised equipment (page 13). [21]
Western Australia	Work Health and Safety Act 2020 (WA). It binds the Crown (s 10), and has its own industrial manslaughter offence (s 30A). [14]	Its own electrical safety laws also apply; this edition does not summarise them.
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 (NSW) commenced on 22 August 2025, and it refers to that Regulation's provisions as sections. [15]	The duties are broadly alike, but text and numbering can differ, and each has its own electrical licensing and safety law: check yours.
Offshore	In the Commonwealth offshore area, the Work Health and Safety Act 2011 (Cth), as modified, applies to offshore infrastructure activities, with NOPSEMA as the regulator (Offshore Electricity Infrastructure Act 2021 (Cth) ss 175, 226, 227). [12]	Our recommendation: on an offshore wind project, settle which WHS law and regulator apply to each part of the work, onshore and offshore, before it starts.
The Commonwealth	The Security of Critical Infrastructure Act 2018 (Cth) applies across every state to the critical electricity, gas, and liquid fuel assets its Rules specify (page 18). [9, 11]	It adds a risk program; it does not replace the WHS duty.

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 ELECTRICAL WORK

Treat it as live until it is proved dead.

The model Regulations start from one rule: no electrical work on energised equipment. On a solar farm that rule meets plant a switch cannot make dead: Queensland's code of practice for solar farms says PV modules "cannot be isolated".[2, 7]

> **A business must ensure that "each exposed part is treated as energised until it is isolated and determined not to be energised".**
>
> Model Work Health and Safety Regulations, regulation 155(2)[2]

05 ELECTRICAL WORK

Plant that stays live.

The model Regulations' electrical rules cover equipment used for controlling, generating, supplying, transforming, or transmitting electricity above extra-low voltage, that is, above 50 V AC or 120 V ripple-free DC (rr 5, 144). Our reading: that takes in turbines, inverters, and battery systems. Three sources of energy need more than a switch.[2]

Solar arrays.

Queensland's code says PV modules generate whenever they are exposed to light, sunlight or the lights used for night work, so their terminals and cables always carry an electrical risk, and the SWMS should deal with it (code s 3.5). It applies to solar farms of at least 100 kW.[7]

Battery systems.

Our view: a battery keeps its charge when it is disconnected from the grid. Treat its terminals the same way, proved dead or worked as live under the rules below. WorkSafe Queensland names energy storage systems as part of the duty, from design to decommissioning.[8] Heat, gas, and fire are separate risks (page 21).

High voltage plant.

Each high voltage exposed part is earthed after it is de-energised (r 155(2)(b)), and equipment de-energised for the work must not be re-energised by accident while the work goes on (r 156).[2]

Four steps, in order.

Where the model's live work rules apply, the work runs in this order. Most duties fall on the business doing the electrical work; rr 156, 159, and 160 bind every business, yours included (r 153, page 24). A summary, not a full authorisation: r 158 adds clear access and a marked, operable isolation point (Queensland: page 13).

1

Test first.

Before electrical work, a competent person tests whether the equipment is energised.

r 155(1)[2]

2

Dead by default.

No electrical work on energised equipment. Unsafe equipment is disconnected and stays disconnected until it is repaired or tested and found safe, or replaced or removed.

rr 154, 149[2]

3

Live only for a listed reason.

Necessary for health and safety, for the work to be done properly, or for testing, or no reasonable alternative. Then a risk assessment by a competent person, recorded, and the work authorised after consulting whoever manages or controls the workplace.

rr 157(1), 158[2]

4

Then the controls.

A competent person with suitable, tested tools and PPE, a SWMS, and a safety observer assessed in the previous 12 months as competent to rescue and resuscitate; no observer is needed where the work is only testing and the risk assessment shows no serious risk. The risk assessment is kept at least 28 days after the work and the SWMS until the work is done; after a notifiable incident, each is kept at least 2 years.

rr 161, 162[2]

Who these rules reach. They do not apply to work by or for an "electricity supply authority" on the equipment it controls or operates to transform, transmit, or supply electricity (r 152). The model leaves each state to define that term (r 5), so whether a generator's own site work sits inside it depends on your state's law: read it before relying on the exemption. In Queensland these rules are not used at all (page 9).[2, 19]

05 ELECTRICAL WORK

What a licence will not show.

These checks sit around the electrical work: who isolated what, whether the worker is fit for this shift, and how the plant goes back into service. The duty behind them is the law; the forms are ours.[1]

Control	What it means on site	Status and source
Permits and isolations	Switching, isolation, live work, and confined space entry run under a permit, with a named person who issues and closes it. Our recommendation: isolations only by whoever has authority over that plant, such as the owner's authorised switching operator. The permit names the plant, how each point is locked, how the safe state is proved, stored charge included, and who authorises release of isolation; permits are linked where the network business's equipment is involved.	LAW the primary duty, s 19; no accidental re-energising during the work, r 156[1, 2] GOOD PRACTICE the permit forms, the isolation authority, and linked permits
Fit for this shift	A current licence says nothing about today. Before a long or night shift, or a long drive to a remote site, check each worker's recent hours, other employers included, their rest and travel, and the breaks planned. Give workers a way to report fatigue without pressure.	LAW the primary duty, s 19[1] GOOD PRACTICE the pre-shift check
Handback and return to service	Work complete, permit closed, and permission to energise are three sign-offs. Safeguards restored and verified; isolation released only through the authorised process; any retained isolation, defect, or restriction recorded before the handback is accepted; the record shows who can refuse it.	LAW the workplace without risks so far as is reasonably practicable, s 20(2)[1] GOOD PRACTICE the signed handback, accepted
When the check cannot be done	No signal or a stale record: confirm identity and the evidence another way, such as a call to the control room. For high risk work, a call does not replace the licence check: the business must still see written evidence of the licence before the work starts (r 85). Record who decided. Where evidence or controls cannot be confirmed, hold safety-critical work until they are.	LAW the licence check, page 3[2] GOOD PRACTICE the fallback route

Who may do it: the state's licence.

The model WHS Regulations leave electrical licensing to each jurisdiction's own law (r 146 and its Appendix note). Queensland's shows what to ask of the electrical contractors you engage.[5]

The worker.

In Queensland nobody may perform or supervise electrical work unless they hold an electrical work licence that authorises it, except in the cases s 55(3) lists, such as an apprentice performing electrical work in their calling (s 55(1), (3)); maximum penalty 400 penalty units.[5]

The business.

A business whose work includes electrical work must hold an electrical contractor licence (s 56(1)), and must ensure the work, and any supervision of it, is done by the holder of a licence that authorises it (s 57AA(2)).[5]

The register.

Where its own work includes electrical work and it engages others, a business keeps a register of licensed workers, shows it to an inspector immediately on request, updates it within 7 days of being told of a change, and keeps each entry at least 5 years after the person stops being engaged (s 57AB). Our recommendation: if you do no electrical work yourself, ask each electrical contractor for its register.[5]

05 ELECTRICAL WORK

Queensland: its own electrical route.

Queensland's WHS Regulation does not use the model's electrical rules (page 9). Its Electrical Safety Regulation 2026 commenced on 1 September 2026 (s 2) and has its own. This page is a route into it, not a summary.[19, 21]

Topic	What it says	Status and source
Energised work	No electrical work on or near energised equipment unless it is necessary for health and safety, necessary for the work to be done properly, necessary for testing, or there is no reasonable alternative. "Near" means within 3 metres of an exposed energised part (ss 193, 195). Test first; treat every exposed part as energised until it is isolated and found not to be; earth each high voltage part after de-energising; do not re-energise by accident (ss 196, 197). The duties fall mainly on the business doing the work; ss 197, 201, and 202 bind every business (s 194).[21]	LAW Qld Electrical Safety Regulation ss 193 to 197[21]
Before and during live work	Before it starts: a recorded risk assessment by a competent person, a SWMS, a clear work area, a marked and operable isolation point, and authorisation after consulting whoever manages or controls the workplace (s 199). During it: entry to the immediate area is limited to authorised people, and inadvertent contact with an exposed energised part is prevented (ss 201, 202). The work is done by a competent person with suitable, tested tools and PPE, to the SWMS, with a safety observer unless it is only testing and the risk assessment shows no serious risk (s 203).[21]	LAW ss 199, 201 to 203[21]
Overhead and underground lines	So far as is reasonably practicable, nobody and nothing comes within an unsafe distance of an overhead line; where that is not reasonably practicable, a risk assessment and controls that match it and any requirements of the line's electricity entity (ss 10, 11, 13). So far as is reasonably practicable, nobody and nothing damages an underground line (s 14). Where work has a risk of contact with one, a risk assessment is done, and the controls match it and any requirements of the line's electricity entity (s 15).[21]	LAW ss 10, 11, 13 to 15[21]
Telling the regulator	A business ensures the regulator is notified immediately, by the fastest possible means, by telephone or in writing, of a serious electrical incident or dangerous electrical event arising out of its business; written notice within 48 hours if the regulator requires it; keep the record 5 years (s 292). The distribution entity has its own 24-hour written notice duty (s 293). The person with management or control of the place ensures, so far as is reasonably practicable, that the site is not disturbed until an inspector arrives or directs otherwise (s 296). This is separate from the WHS notification (page 20).[21]	LAW ss 292, 293, 296[21] GOOD PRACTICE agree who calls each regulator before the job



06 HEIGHT, LIFTS, AND RESCUE

A harness needs a rescue behind it.

Turbine towers, nacelles, and blades put much of the maintenance work at height, often far from help. The model Regulations set the order of controls, and add a duty that is easy to miss: a rescue that works.[2]

> **Where a fall arrest system is used, the business "must establish emergency procedures, including rescue procedures, in relation to the use of the fall arrest system".**
>
> Model Work Health and Safety Regulations, regulation 80(2)[2]

06 HEIGHT, LIFTS, AND RESCUE

Falls: the order of controls.

Where a fall from one level to another is reasonably likely to cause injury, the business manages the risk in this order. Each step is the law.[2]

1

On the ground first.

So far as is reasonably practicable, the work is done on the ground or on a solid construction, with safe access and exit.

r 78(3), (4)[2]

2

Prevent, position, arrest.

If the risk remains: a fall prevention device; if that is not reasonably practicable, a work positioning system; only then a fall arrest system.

r 79(3)[2]

3

A rescue that works.

With fall arrest, emergency and rescue procedures set, tested so they are effective, and workers given the information, training, and instruction to follow them.

r 80(2) to (4)[2]

Construction work with a risk of a fall of more than 2 metres is high risk construction work, which needs a SWMS before it starts (r 291(a), r 299). The model names a telecommunication tower but no wind turbine; construction work on a turbine tower is caught by the 2 metre test, but minor testing, maintenance, or repair is not construction work (r 289(3)(d)).[2]

Lifts: the licence for the class.

Cranes, rigging, dogging, and boom-type elevating work platforms with a boom of 11 metres or more are licensed high risk work. The business sees written evidence of each licence before directing or allowing the work, and keeps a record of it for at least 1 year after the work (r 85(1), (4)). At a gas-fired or other thermal station, operating a steam turbine of 500 kW or more with a listed feature is licensed too (Sch 3 item 28).[2]

Cranes.

Licensed by class: slewing mobile cranes up to 20, 60, and 100 tonnes and over 100 tonnes; non-slewing mobile cranes over 3 tonnes. Schedule 4 makes the dogging course part of the qualification for most crane licences.[2]

Rigging.

Three levels. Intermediate covers cranes, conveyors, dredges, and excavators, and dual lifts, among others; advanced adds gin poles, shear legs, and guyed derricks and structures. Basic rigging includes dogging work, and every rigging licence needs the dogging course.[2]

Work platforms.

A boom-type elevating work platform needs a licence where the boom is 11 metres or more, measured as the greater of the platform's height and its reach.[2]

Near the connection line.

So far as is reasonably practicable, no person, plant, or thing comes within an unsafe distance of an electric line; otherwise, a risk assessment, and controls consistent with it and with any requirements of the line's electricity supply authority (r 166). Queensland's Regulation does not use this rule (page 9).[2]

Industry training.

Our recommendation: where a turbine contract asks for Global Wind Organisation (GWO) training or an equivalent, hold each certificate and its expiry on the record. It is Good practice; the law asks for training suited to the work, its risks, and the controls (r 39).[2]

07 THE BUILD, ALONE, AND ENCLOSED

Built far from help.

Three duties follow the work: the build, the worker alone, and the enclosed space.



The build: three tests, not one.

Construction law reaches commissioning, and it asks three separate questions. Do not run them together.

Construction work.

Includes commissioning, decommissioning, and dismantling a structure, the installation and testing that go with them, and such work on, under, or near water, as at a hydro station's intake or tailrace (r 289). Minor testing, maintenance, or repair is not construction work (r 289(3)(d)). [2]

High risk construction work.

Work with a listed risk, such as a fall of more than 2 metres, or work on or near energised installations, in or near a confined space, or in or near water with a drowning risk, needs a SWMS before it starts, whatever the cost (rr 291, 299). On a construction project, the principal contractor takes all reasonable steps to get each one before the work starts (r 312). [2]

A construction project.

Construction work costing AU$250,000 or more under the model Regulations (r 292), or AU$450,000 or more in South Australia (r 292 of its Regulations). It has one principal contractor at a time (r 293) and a written WHS management plan (r 309). In Victoria, the principal contractor duties apply from AU$350,000 (OHS Regulations 2017 r 332), with a health and safety co-ordination plan instead (r 335). General construction induction is not a project rule: every worker doing construction work needs it, whatever the cost (r 317). [2, 17, 20]

The business that commissions a project is its principal contractor unless it engages another business and authorises it to manage or control the workplace (r 293). [2] Our view: define the project and its cost first; one battery enclosure can be high risk work without being a project.

Alone, out of reach, and the rescue.

A technician alone at a battery compound, or on a night patrol of an array, can be doing remote or isolated work: work isolated from other people's help by location, time, or the nature of the work. It needs a system of work that includes effective communication with the worker (r 48). [2] A check-in message is not a rescue plan. Our recommendation: decide who watches the check-ins and what a missed one triggers, and settle these three things for each remote site and turbine type, in proportion to the risk.

Rescue at this site.

Name each turbine or enclosure's access point, the rescue kit and trained people on site that day, and tested communications there. Test the rescue for each turbine type; where fall arrest is used, the law asks for rescue procedures that are tested so they are effective (r 80(1), (3)). [2]

When help cannot reach.

Name who owns the escalation, how long an ambulance or fire service would take to reach a casualty there, and what the site does meanwhile. If that is not acceptable, hold the job until it is.

Stop and overlap.

Set stop criteria in the task plan: wind, lightning, heat, fire danger, and other work at the same time, such as a lift beside the turbine or a switching program. Our view: whoever authorises the task owns the decision to stop it.

07 THE BUILD, ALONE, AND ENCLOSED

Confined spaces: the test, then the controls.

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).[2] A hub, a blade, or a tank is not one by default. Our recommendation: classify the space and the task.

Before entry.

A competent person's written risk assessment (r 66); risk from connected plant and services eliminated, or where that is not reasonably practicable minimised, 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 (r 5). Where that is not reasonably practicable and oxygen is below 19.5%, the floor published in those 2025 model WHS Regulations, air-supplied respiratory equipment for each worker (r 71(2)), never as a first choice. Flammable gas, vapour, or mist kept below 5% of its LEL so far as is reasonably practicable; workers come out at 5% unless a suitably 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 allowed in, the time, and the controls, with room to sign that everyone has left (r 67). It records the controls; it does not replace them. The risk assessment is kept at least 28 days after the work, and the permit at least until the work is done; after a notifiable incident, each is kept at least 2 years (r 77).[2]

Who verifies the air, and when.

Our recommendation: settle six things in the entry assessment, before the permit is drafted. A generic "gas tested" tick replaces none of the limits.

1

Can entry be avoided?

Could the work be done from outside, by remote tool, or by changing the task?

2

Who tests.

A competent person, named on the permit, tests and monitors. Where conditions can change, monitoring is continuous, and the detector rule for flammable gas in the atmosphere card above applies (r 72(2)(a)).[2]

3

What, and where.

Oxygen, flammable gas, and the contaminants the task or the space can produce, sampled where people will work, at more than one height.

4

The equipment.

An instrument, and any ventilation or breathing equipment, suited to the space and the contaminant, with calibration in date.

5

Stop and get out.

Written stop and evacuate criteria: which readings mean everyone comes out, and who calls it.

6

Hydro and turbine spaces.

Inflow, a connected penstock or pump, or a nearby process can change the atmosphere after the test. Re-test after any change, and confirm each connected service stays isolated (r 70).[2]

08 CRITICAL INFRASTRUCTURE

The people who can reach the asset.

Larger generators carry a second, Commonwealth duty. It is about security, not only safety. And it names contractors.

Which energy assets it covers.

Under the Security of Critical Infrastructure Act 2018 (Cth), an electricity generation station is a critical electricity asset where it is connected to a wholesale electricity market and either has an installed capacity of at least 30 megawatts, or its owner or operator is contracted to provide a system restart ancillary service (Act s 10; Definitions Rules s 5).[9, 10] Gas processing facilities and gas storage facilities at or above set capacities are critical gas assets (s 12(1)(a), (b)).[9] The Rules read for this guide do not mention batteries or energy storage, so this guide does not say whether a grid battery is caught: settle it for your own asset.[10]

What the responsible entity must do.

The responsible entity, generally whoever holds the licence, approval, or authorisation to operate the asset (s 12L), must adopt, maintain, and comply with a critical infrastructure risk management program (ss 30AC, 30AD): 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 and mitigate its impact (s 30AH(1)).[9] For personnel hazards, the Rules set four requirements, below; critical electricity, gas, and liquid fuel assets carry enhanced requirements on top (Rules s 4A(1), (3)).[11]

1

Identify critical workers.

A critical worker is an employee, intern, contractor, or subcontractor who has access to, or control and management of, a critical component of the asset, and whose absence or compromise would prevent its proper function or could cause significant damage to it, as the responsible entity assesses.

Act s 5; Rules s 9(1)(a)[9, 11]

2

Assess before access.

A critical worker reaches critical components only once assessed as suitable (s 9(1)(b)). Under the enhanced rules, once their grace period ends, suitability means an AusCheck background check followed by the entity's assessment, or a relevant security clearance; a worker who meets neither may have access only if the program records the risk and the actions taken. For ongoing access the AusCheck check is repeated at least every 5 years; a clearance is revalidated, or replaced by an AusCheck check, before it lapses.

Rules s 9(1)(b), s 4A(6), s 9A(3) to (6)[11]

3

Manage the insider risk.

So far as is reasonably practicable, minimise or eliminate material risks from malicious or negligent employees or contractors.

Rules s 9(1)(c)(i)[11]

4

Off-board properly.

And the same for the off-boarding of outgoing employees and contractors. The enhanced rules also cover unauthorised or unsupervised access, credentials and privileged access, access by people who are not critical workers, and incoming and outgoing critical workers, after the grace periods the Rules set.

Rules s 9(1)(c)(ii), s 9A(2), s 4A(6)[11]

Reported every year. Each entity gives an annual report on its program within 90 days after the end of the financial year (s 30AG(2)); where the entity has a board, council, or other governing body, that body approves the report (s 30AG(2)(f)).[9] Our recommendation: keep which contractors are critical workers, when each was assessed, and when access ended, on the same record as their safety checks.

08 CRITICAL INFRASTRUCTURE

Which dates apply to your asset.

For a critical electricity asset already covered when the enhanced Rules commenced on 10 June 2026, the enhanced personnel requirements arrive in two steps (Rules s 4A(6)). An asset that becomes covered later counts each period from its own date, so work that date out for your asset. [11]

1

Now.

The baseline personnel requirements on page 18: identify critical workers, assess before access, manage the insider risk, and off-board properly.

Rules s 9 [11]

2

End of 10 June 2027.

Access management, 12 months on: unauthorised or unsupervised access, credentials and privileged access, people who are not critical workers, and incoming and outgoing critical workers.

Rules s 9A(2), s 4A(6)(a) [11]

3

End of 10 June 2028.

The rest of s 9A, 24 months on: the two access routes, ongoing suitability, AusCheck at least every 5 years, and clearance revalidation.

Rules s 9A(3) to (6), s 4A(6)(b) [11]

Each grace period ends at the end of its date. The Rules count from "the commencement of this instrument", which the explanatory statement to the 2026 amending Rules reads as 10 June 2026. [11, 23] An asset the Minister declared critical under s 51 of the Act before then, by a declaration that makes it subject to Part 2A of the Act, stays outside the enhanced rules while that declaration, as made, stays in force (Rules s 12). The AusCheck date in the access map on page 26 is an illustration: a check date shows a check was done, not that a worker is suitable or that access is approved.

Who sees what.

Our recommendation: keep security and safety checks on one record, but not on one level of access. A gate does not need a worker's background check, only the decision that came from it.

Site and gate.

Operational status and review date only: cleared, cleared with a restriction, pending, or access ended. Enough to let a worker in, or not.

Security and asset roles.

The suitability decision, the route taken, any restriction on access scope, who approved it, and when it is reviewed. Only the people who make or act on the decision.

The vetting material.

Identity documents and background check results stay with the few roles that need them, for a stated purpose, with access logged and a secure way to hand them on.

Keep it only as long as it has a purpose. Our recommendation: set a retention period for each kind of record, and when the purpose has ended and no legal minimum, records rule, or incident or claim hold applies, destroy or de-identify it. Which privacy law applies to your entity is for you to work out; this guide does not settle it.

What each worker's record shows.

Our recommendation: the company's record links to each critical worker's own record, so a date can be traced to a person, a component, and a decision.

- Which components the worker can reach, and the scope of access, such as one substation or one control room.
- The suitability decision and who made it, the route (AusCheck, a clearance, or recorded exceptional access), and any restriction.
- The date of the check or clearance, the date it is next reviewed or revalidated, and the date access ended.
- The company that supplies the worker, so a change to the contract changes the access.

09 WORKED EXAMPLE

Adding a battery to a working solar farm.

A solar farm in regional NSW on a bright weekday. The owner is adding a battery: an EPC contractor builds and commissions it while the operations provider keeps the array running. The rule numbers are the model's; NSW numbers its own Regulation's provisions as sections, so check yours. [15]

What is live	Why it matters	What gets checked and kept
The build	Building and commissioning the battery is construction work (r 289). Under the model Regulations, construction work costing AU$250,000 or more is a construction project with one principal contractor: the owner, unless it engages and authorises the EPC contractor (rr 292, 293); Victoria's principal contractor duties start at AU$350,000 (r 332 of its OHS Regulations) and South Australia's at AU$450,000 (r 292 of its Regulations). [2, 17, 20]	The principal contractor named in the contract, with its WHS management plan (r 309); each worker's construction induction card (r 317); a SWMS for each kind of high risk construction work
The array beside it	Modules next to the new cabling generate in daylight, and under work lights at night. Exposed parts are treated as energised until isolated and proved not to be (r 155(2)); live work only for a listed reason (r 157). [2, 7]	The SWMS for work near energised equipment (r 291(k)); the test record; where live work is done, the observer's rescue assessment
The lift	A slewing mobile crane sets the battery enclosures. The operator holds the licence for the crane's class, and the dogger or rigger holds theirs, each sighted before the lift (page 15); the boom stays outside an unsafe distance from the site's overhead line so far as is reasonably practicable, or the risk is assessed and controlled to match it and any requirements of the line's electricity supply authority (r 166). [2]	Licences sighted and recorded, kept at least 1 year after the work; the lift plan; the line's distance set for the job
The slashing crew	A contractor slashes grass between the rows, alone at the far end of the array for hours: remote or isolated work, so a system of work with effective communication (r 48). [2]	The check-in plan and who watches it; how a missed check-in is escalated
The handover	At the end of commissioning, the EPC contractor hands the battery to the operations provider. The workplace and anything arising from it must be without risks so far as is reasonably practicable (s 20(2)). [1]	The isolations, tests, open defects, and limits in force; who accepts the battery, and who can refuse it
If something goes wrong	A notifiable incident is reported to the regulator immediately after the business becomes aware of it, by the fastest possible means (s 38(1), (2)). [1]	Who calls, agreed first: under the model Act as at 5 December 2025, one notice is enough (s 38(1A)), where your state has adopted it; each business keeps its own duty (page 6). Under the model Act, the person with management or control preserves the site, so far as is reasonably practicable, until an inspector releases it (s 39(1)); who tells the electrical regulator where your state requires it (page 13)

The same week, on paper and joined up.

On paper

The EPC contractor's induction cards sit in its site office; the crane operator's licence was checked at tender; the slashing contractor signs a book at the gate nobody reads; nobody can say who is on the array at 6 pm.

Joined up

Each worker signs in at the gate, licence, card, and tickets checked against the record; the SWMS and the permits sit on the job; the live list shows who is on site, and the slasher's check-ins are watched.

09 WORKED EXAMPLE, CONTINUED

Handing over the battery.

The example ends with a handover. For a battery, a handover also has to cover heat, gas, and fire, not only electric shock. Everything on this page is illustrative: the boundaries are examples, not requirements.

The commissioning boundary, made explicit.

Settle in writing	What it means for the battery
The energisation boundary	The point up to which the EPC contractor controls the plant, and from which the operator does. Who may authorise the first energisation of each enclosure, and on what evidence.
Overlapping permits	EPC commissioning work and the operator's array permits can touch the same cabling. Name which permit governs each area, and how the permits are linked.
Temporary controls	Temporary earths, barriers, and any bypassed alarm or interlock used during commissioning are listed, with who removes each and when.
The acceptance authority	The named person who accepts the battery, the evidence they need (tests, open defects, limits in force), and who can refuse it.

Battery emergencies: more than shock.

Our recommendation: require a competent, site-specific emergency plan before the first energisation, and for any units stored on site before commissioning. This guide gives no firefighting instruction: that belongs to the plan's author, the manufacturer, and your fire authority. Put the electrical incident notification (page 13) in the same plan.

1

What it is.

The battery type, its size, its state of charge, and the manufacturer's emergency response information, held where responders can reach it.

2

Alarms and monitoring.

What each alarm means, who watches it, and who responds. Abnormal heating or off-gassing is a signal to stop work and withdraw.

3

Access and exclusion.

The emergency access route, the exclusion distance, and who controls entry to it, contractors and visitors included.

4

Evacuation and responders.

The muster point, the information handed to responders, and who meets them at the gate.

5

Stored units.

Batteries delivered and held before commissioning are covered by the same plan, and a unit that is not yet connected is not a unit that is off.

6

Authority to resume.

Who decides it is safe to go back, and on what evidence.

10 THE RECORD

What to hold for every contractor.

Unless another law is named, numbers are the model WHS Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 9).

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

REGULATOR guidance **GOOD PRACTICE** our recommended way; your contract, policy, or the law may still require it

Level	What to hold	Status and source
The company	Any accreditation your site or the network requires, held apart from each worker's licence; in Queensland, an electrical contractor licence for a business doing electrical work (s 56); public liability and any other cover the contract asks for, with expiry dates; its workers compensation cover under its own scheme	**LAW** Qld s 56(1), page 12 [5] **POLICY** your site's rules and the contract; workers compensation duties are not summarised here
	On a critical infrastructure asset: whether the contractor supplies critical workers, and its part in the program	**LAW** SOCI Act s 30AC; Rules ss 9, 9A; pages 18 and 19 [9, 11]
The worker	Written evidence of any high risk work licence (crane, rigging, dogging, work platform, or steam turbine), sighted before the work and kept at least 1 year after it; class, scope, conditions, and status checked; reviewed on a suspension, an incident, or a change of scope	**LAW** r 85(1) and (4); Sch 3 [2] **GOOD PRACTICE** the status check
	The electrical licence your state requires for the work, its class and status; in Queensland, where your own work includes electrical work and you engage others to do it, the register of licensed workers, each entry kept at least 5 years after the worker stops being engaged	**LAW** your state's licensing law, such as Qld ss 55, 57AB, page 12 [5] **GOOD PRACTICE** asking each electrical contractor for its register
	For live work, the safety observer's rescue and resuscitation assessment, within the previous 12 months; general construction induction training for construction work; training in the rescue procedures for anyone using fall arrest; GWO or other tickets the contract asks for, with expiry dates	**LAW** rr 161(4), 317, 80(4) [2] **POLICY** the contract's tickets
	For a critical worker, the suitability assessment and its date, the AusCheck check or security clearance where the enhanced rules apply, its renewal date, and the date access ended	**LAW** Rules s 9(1)(b), (c)(ii), s 9A(3) to (6) [11] **GOOD PRACTICE** the dates
The site and the visit	A site induction suited to the work and its risks; on a construction project, the principal contractor's WHS management plan; a SWMS for high risk construction work; the live work risk assessment, kept at least 28 days after the work; a written confined space entry permit, its risk assessment, and the entrants' training record; for lone or remote work, the check-in plan; near electric lines, the distance set or the risk assessment; with fall arrest, the tested rescue procedure; sign in and out by site	**LAW** rr 39, 309, 299, 162, 67, 76, 77, 48, 166, 80 [2] **GOOD PRACTICE** the induction form and sign-in
	The permit and isolation record, and the signed handback	**LAW** the duties these show, page 12 [1, 2] **GOOD PRACTICE** the record and the forms
	Keep each record for the longest of the legal minimum, any government records rules that bind you, and any incident or claim hold; then destroy or de-identify. The employee records exemption covers only an employer's records of its own current or former employees, so it does not cover what you hold about a contractor's workers	**GOOD PRACTICE** the retention schedule **LAW** Privacy Act 1988 (Cth) s 7B(3) [18]
The incident	Under the model Act as at 5 December 2025, where adopted: violent incidents notifiable too, notifiable suicides (immediately) and notifiable extended absences (within 14 days) added, one notice per event; each record kept at least 5 years; the site preserved, so far as is reasonably practicable, until an inspector releases it (s 39); where adopted, the notifier and the site controller tell each other at once (s 39A); no business's own duty moves	**LAW** ss 35, 35A, 35B, 38(1), (1A), (7), 39, 39A, where adopted [1] **GOOD PRACTICE** the escalation

10 CHECKLIST

Before a contractor starts.

Each line is tagged: the law, or our recommendation. Write the owner and evidence as you go; where a line does not apply, say why. It runs over three pages, 23 to 25.

	Check	Applies, or N/A and why	Owner	Date and evidence ref.
Before engagement				
☐	We know which WHS law, regulator, and electrical safety law apply to us and to each contractor, onshore and offshore. **Law, pages 9 and 13** **Good practice** the site access map, page 26			
☐	The company's accreditation, insurance, and workers compensation cover are on file, with dates, apart from its workers' licences. **Policy** the contract, page 22			
☐	On a critical infrastructure asset, we know which of its workers are critical workers, and none reaches critical components before being assessed as suitable. **Law, page 18**			
☐	We know which dates apply to our asset: the baseline now, and for an asset already covered, access management once its grace period ends at the end of 10 June 2027, and the rest at the end of 10 June 2028; a later-covered asset counts from its own date. **Law, page 19**			
☐	The status the gate shows is operational only, the vetting material is kept to the roles that need it, and each record has a retention period and a disposal decision. **Good practice** pages 19 and 22			
☐	On a construction project (thresholds on page 16), the principal contractor is known and has its WHS management plan before the work. **Law, page 16** **Good practice** naming it in the contract			
☐	Every construction worker holds general construction induction, refreshed by construction work in the past 2 years. **Law, page 16**			
Before the first shift				
☐	Each worker's electrical licence, high risk work licence, and tickets are on file, with class, scope, conditions, and current status. **Law, pages 3, 12, and 15** **Good practice** the status check			
☐	A SWMS for each kind of high risk construction work, including falls over 2 metres, work on or near energised electrical installations or services, work in or near a confined space, and work in or near water with a risk of drowning. **Law, pages 15, 16, and 20, r 291(a), (f), (k), (q)** versions and dates			

10 CHECKLIST

On the day, at the site.

Same columns as page 23. Lines that combined two duties are split, so each can be ticked on its own.

	Check	Applies, or N/A and why	Owner	Date and evidence ref.
Before the first shift, continued				
☐	For a battery installation, the energisation boundary, overlapping permits, temporary controls, acceptance authority, and battery emergency plan are agreed before first energisation. **Good practice** page 21			
On the day, at the site				
☐	Every worker signed in and out, and any high risk work licence sighted before the work, not after. **Law, page 3 (licences)** **Good practice** sign-in by site			
☐	The business doing the electrical work tests equipment first, treats exposed parts as live until isolated and proved dead (PV and batteries too, on our reading), and earths high voltage parts; every business prevents accidental re-energising during the work (r 153, r 156). **Law, pages 11 and 13** **Good practice** the permit and the test record			
☐	Live work by the business doing it only for a listed reason, after its risk assessment and your consultation, with a current safety observer; your own duty: the immediate area limited to people you authorise, and no accidental contact with exposed live parts (r 159, r 160). An observer is not needed where the work is only testing and the risk assessment shows no serious risk (r 161(5)); a site may still require one, as policy. **Law, page 11** **Policy** the stricter site rule			
☐	Isolations only by the authority for that plant, and each worker fit for this shift. **Law, page 12** **Good practice** the checks and the permit			
☐	Handback: safeguards restored and verified; isolation released only through the authorised process; any retained isolation, defect, or restriction recorded; work complete, permit closed, and permission to energise recorded separately. **Law, page 12** **Good practice** the signed handback			
☐	At height: ground first; prevention before arrest; with fall arrest, a rescue plan tested and climbers trained in it. **Law, page 15** **Good practice** the rescue drill record			
☐	Cranes clear of electric lines so far as is reasonably practicable, or the risk assessed and controlled (r 166; in Queensland, its Electrical Safety Regulation s 13). **Law, pages 13 and 15**			
☐	A remote site has its rescue access point, kit, trained people, and tested communications named, an escalation owner, and stop criteria for weather and overlapping work. **Good practice** page 16			

10 CHECKLIST

Confined spaces, and if it goes wrong.

Same columns as page 23. Each line can be ticked on its own.

	Check	Applies, or N/A and why	Owner	Date and evidence ref.
	Confined spaces			
☐	A confined space classified first. If it is one: a written risk assessment by a competent person, risk from connected plant and services eliminated or minimised, no ignition source, signs at each entry, and standby and communication. **Law, page 17, rr 66, 68 to 70, 73** **Good practice** a competent person's test and monitoring named on the permit, and the six checks on page 17			
☐	Purging or ventilation never uses pure oxygen or an oxygen-enriched mix, richer than air (r 71(1)); a safe oxygen level while anyone is inside, with air-supplied respiratory equipment only where r 71(2) applies, never as a first choice. **Law, page 17, r 71**			
☐	Flammable gas within the r 72 limits or workers out (page 17), rescue equipment (r 75) and practised rescue, trained entrants (r 76), and a written entry permit. **Law, page 17, rr 67, 72, 74 to 76** permit numbers			
☐	A worker alone or remote has a way to call for help that works there; someone watches the check-ins and escalates a missed one. **Law, page 16 (r 48)** **Good practice** who watches, and the escalation			
	If something goes wrong, and standing			
☐	We have agreed with each contractor who gives the notice as lead notifier, immediately as the law requires, who preserves the site until an inspector releases it, and who tells the electrical safety regulator where the state requires it; each business keeps its own duty. **Law, pages 13 and 20 (s 38)** **Good practice** the agreed route			
☐	A battery has an emergency plan: alarms and who responds, exclusion, evacuation, who meets responders, and who decides it is safe to resume. **Good practice** page 21			
☐	Officers receive a regular report that verifies the checks happen: overdue actions, and a sample of permits and SWMS checked against the work done. **Good practice; verifying is part of due diligence, s 27(5)(f)**			

10 TEMPLATE

The site access map.

One card per site or asset; the first is an example. It settles, before the job starts, which law applies, who may work there, what they must hold, and who has to know. Copy the blank card for each site.

Site or asset	Illustrative example: a 150 MW wind farm in western Victoria, in operation
Which laws, which regulators	OHS Act, WorkSafe Victoria; Electricity Safety Act, a complex electrical installation; SOCI Act, a critical electricity asset
Who controls it	The owner's operations provider, under the operations contract
Who authorises access and work	The site manager; high voltage switching by the owner's authorised switching operator
Live plant, height, and spaces	Collector cabling and the substation; towers with fall arrest, rescue kit checked each visit; the hub assessed as a confined space for one task
Critical workers	The control system contractor: worker records W-01 and W-02, each linked to the company. Scope: the SCADA workstation and the east substation only. AusCheck check dated 03/03/2026 (illustrative); suitability decision: approved with escort at the substation, 04/03/2026
Alone, after hours, and who reports	No lone climbs; lone patrols check in with the control room; the owner gives the notice as lead notifier, agreed with each contractor; each keeps its own duty; Energy Safe Victoria told where its law requires it
Applies, accountable person, evidence, decision, review date	Applies: yes. Accountable: the site manager. Evidence: access map v3, permit log. Decision: approved. Reviewed 01/11/2026; next review 01/05/2027 or on any change

Site or asset	
Which laws, which regulators	
Who controls it	
Who authorises access and work	
Live plant, height, and spaces	
Critical workers	
Alone, after hours, and who reports	
Applies, accountable person, evidence, decision, review date	

How to keep the map true.

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

Fill it in together.

Operations, asset management, safety, security, and procurement should agree each card. 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 service agreement, a construction stage, a changed critical worker, or a new operations provider changes the card. Give each card a review date.

Keep it with the record.

The map is only useful if the site, the control room, and the on-call manager can see it when a contractor arrives.

11 ONE STANDARD ACROSS EVERY SITE

The same standard at every site.

Every check in this guide has to work at every site, staffed or not, from the first day of construction to the last shift of operations.

Questions to ask about how you manage it today.

1. If a regulator asked who climbed turbine 14 last Tuesday, and what each held, how long would the answer take?
2. At a solar farm or battery compound with nobody there, who knows a contractor is in, and who answers when check-ins stop?
3. When a crane licence, a rescue certificate, or a safety observer's assessment lapses, who finds out before the next shift?
4. Do you hold a contractor's accreditation and each worker's licence separately, so one is never taken as proof of the other?
5. Has the fall arrest rescue been tested for each turbine type, and do the contractors who climb know it?
6. Which of your contractors' workers are critical workers, and when was each assessed?
7. Have you agreed with each contractor who reports a notifiable incident, and who tells the electrical safety regulator?
8. How many hours a month go on chasing certificates?

What to look for in a system.

Seven capabilities that keep these checks working at every site. A system holds evidence; it does not prove compliance on its own, and a live list is only as good as sign-in, coverage, and a fallback.

- **Company and worker, kept apart.** A contractor's panel approval and each worker's clearance, on one record but never confused.
- **Requirements matched to the work.** Site inductions for turbine, solar array, or battery work, and licences checked against the lift plan's crew list.
- **Expiry tracked for you.** GWO and licence renewal reminders sent before anything lapses.
- **A check at the gate.** A QR check-in at the compound or the turbine base, with no gatehouse needed, and a paper or call fallback where coverage is patchy.
- **Permits on the same record.** High voltage isolation and switching, and confined space entry, with permits that can be set not to close without the standby sign-off and the exit check.
- **Inspections that close.** Every failed item becomes an owned, dated action.
- **A record for the audit.** One searchable record per project, with scheduled reports.

START SMALL

Start with one site.

Take one site or service agreement, fill in its card of the access map on page 26, and run the checklist on pages 23 to 25 against its contractors. Close the gaps first: worker ready, work authorised, controls in place. Then ask anyone offering a system to show each point above on your own sites, offline included.

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Every source, with the date it was read.

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This guide is general information, not legal advice. It summarises the model Work Health and Safety Act and Regulations published by Safe Work Australia (as at 5 December 2025), Victoria's Occupational Health and Safety Act 2004, its OHS Regulations 2017 (rr 332, 335), and its Electricity Safety Act 1998, the Electrical Safety Act 2002 (Qld), the Electrical Safety Regulation 2026 (Qld), the Work Health and Safety Regulation 2011 (Qld), the Work Health and Safety Regulations 2012 (SA), and Queensland's code of practice for solar farms, the Western Australian WHS Act 2020, the Security of Critical Infrastructure Act 2018 (Cth) and its Definitions and risk management program Rules (with the explanatory statement to the 2026 amending Rules), the Offshore Electricity Infrastructure Act 2021 (Cth), the Corporations Act 2001 (Cth) s 9AD, the Privacy Act 1988 (Cth) s 7B(3), and regulator guidance, as read on the dates above. Each jurisdiction enacts its own WHS and electrical safety law, so text and numbering can differ. For a decision about your own sites and contractors, read the law that applies to you and take legal advice. It is a contractor management guide, not a technical manual.

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If you have questions about anything in this guide, how it applies to your own sites and contractors, or about ComplyFlow, we are happy to have a conversation and help answer them.

Get in touch.

Tell us what you are working on, and the right person will come back to you.

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