COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Manufacturing: the contractor compliance guide.

What Australian law asks of manufacturers when contractors work in their plants, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; Victoria's OHS Regulations as at 20 October 2026; the Food Standards Code as at 13 August 2025; sources read on 13 and 17 November 2026

Includes
A checklist, an incident card, and a plant contractor map

Covers
Manufacturing and food and beverage plants, in every state and territory, Victoria named

START HERE

The short version.

What is your plant responsible for when contractors work on your lines, and what should you check before they start?

Contractors keep a plant running: the fitters and electricians in a maintenance window, the refrigeration technicians, the cleaners and sanitation crews, the pest controllers, and security.

1 **Every business on the floor holds its own duty.** Under the WHS laws, a contractor's workers are workers of the plant that engages or directs them, and "A duty cannot be transferred to another person." Our recommendation: check each worker at your gate, whoever employs them (pages 3 to 6).[1]

2 **Stopped means locked, and proved.** The model Regulations ask for plant controls that can be locked off to disconnect all motive power, and for de-energised electrical equipment not to be re-energised by mistake while the work goes on; Safe Work Australia's plant code sets out the steps: isolate, lock out, tag, and try, and a try alone does not prove zero energy (pages 10 to 13).[2, 8]

3 **Licensed for the plant they touch.** See written evidence of a high risk work licence, for a forklift or a boiler for example, before the work; work on refrigeration or air conditioning equipment that uses a fluorocarbon refrigerant (CFC, HCFC, HFC, or PFC) or halon, such as installing, servicing, or maintaining it, or anything that could release the refrigerant, needs a refrigerant handling licence that covers that work (page 14).[2, 12]

4 **Fire, chemicals, and confined spaces are planned first.** The chemicals register is readily accessible to anyone likely to be affected; a tank or silo is classified first, and where it is a confined space, the assessment, isolation, safe atmosphere, standby, and rescue come before the entry permit that records them; and the welding code recommends a hot work permit (pages 15 to 17).[2, 9]

5 **In a food plant, the hygiene rules reach everyone.** The food business must take all practicable measures to ensure "all people on the food premises" do not contaminate food; Food Standards Australia New Zealand's guide says that includes tradespeople (pages 18 to 20).[14, 19]

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01 THE PRACTICAL TEST

The practical test is what you can show.

A plant approves a contractor once. Its people then arrive for a 2 am breakdown, a weekend maintenance window, or the Christmas shutdown. The question an inspector asks: who was on the floor, and were they ready on the day?



An approved contractor is not a ready worker.

Most checks stop at the company. The law reaches further. Under the WHS laws, a business must not direct or allow a worker to carry out high risk work unless it sees written evidence of the worker's licence for it, and it keeps a record of that evidence for at least 1 year after the work (r 85).[2] The business with management or control of plant makes sure its maintenance, inspection, and, if necessary, testing is carried out by a competent person (r 213).[2] In Victoria, an employer's duties extend to the independent contractors it engages, and their employees, for matters over which it has control, or would have control but for an agreement that tries to limit or remove it (s 21(3)).[4]

ASSESSED BEFORE ENGAGEMENT; REVIEWED ON ANY CHANGE

The contractor

- ✓ Prequalified for the work, safety record included; again on a change of scope, an incident, or a lapse
- ✓ Told about your plant, its chemicals, and its rules, and has told you about its own (page 6)
- ✓ The contract: who isolates, who authorises the work, and who reports what

→

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

Each worker, at each plant

Line | Plant room | Food area

- ✓ Inducted to this plant, its hazards, and its food-area rules
- ✓ Licensed and competent for the plant they will touch, and authorised for any isolation or permit (pages 11 to 14)
- ✓ Signed in, briefed on today's permits and isolations, and supervised to match the work

Where it usually breaks.

Four common gaps, each one leaving a plant unable to show who was on the floor and what they held.

The borrowed isolation.
A contractor works behind someone else's lock, and nobody tried the plant before hands went in.

Checked by hand.
Each licence's expiry is typed into a spreadsheet, until a shutdown brings 200 workers to one gate.

The food rules skipped.
Trades and pest controllers walk into production rooms without the hygiene rules the plant's own staff follow.

No view across plants.
Nobody can say who is current at every site, or who was on the floor on Saturday night.

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



02 THE DUTY HOLDERS

Every business on the floor is a duty holder.

The manufacturer, each contractor, the labour hire agency, and the sole trader on the tools each carry their own duty. None of them can pass it to someone else.[1]

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

02 THE DUTY HOLDERS

Who the plant owes the duty to.

Under the WHS laws, three sections of the model Act decide it, and they reach well past the plant's payroll.

Contractors are workers.

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

Engaged or directed is enough.

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

The plant 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]

In Victoria, the OHS Act says it its own way.

An employer's duties to its employees extend to the independent contractors it engages, and their employees, for matters over which it has control, or would have control but for an agreement that tries to limit or remove it (s 21(3)). A worker a labour hire provider supplies is taken to be the host's employee (s 5A). An employer, and a self-employed person, must also ensure, so far as is reasonably practicable, that other people are not exposed to risks from its undertaking (ss 23, 24).[4]

Who is on the floor.

A plant runs on layers of contractors, and each layer needs a place in your checks.

The manufacturer
The business with management or control of the plant and its lines, its own staff, and the contractors it engages

Maintenance and shutdown contractors
Fitters, boilermakers, and welders, and the contractor that brings its own crew for a shutdown

Officers on every side
Directors, and others who meet the officer tests (page 7); the role decides, not the title

Labour hire agencies
Forklift drivers, process workers, and shutdown crews supplied to the plant

Trade contractors
Electricians, refrigeration and HVAC technicians, instrument technicians, and scaffolders

Site and hygiene services
Cleaners and sanitation crews, pest controllers, security officers, and waste

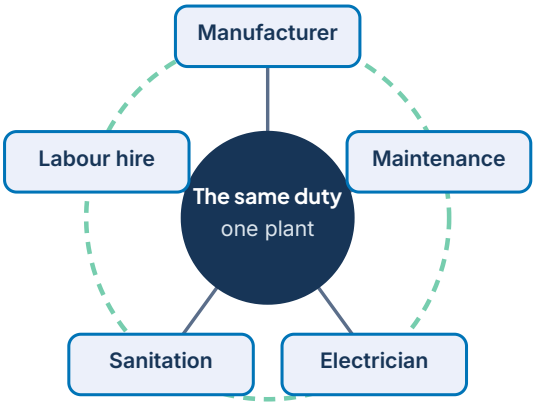
Their subcontractors
Second tiers, sole traders, apprentices, and agency crews

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

02 SHARED DUTIES

Shared, but never handed over.

One maintenance window can put the plant's own fitters, a refrigeration contractor, the electricians, a sanitation crew, and a labour hire crew on one line. Under the WHS laws, four rules apply to every one of them.



Consult, cooperate, and coordinate

1. **Held at once, each to its own control.** "More than 1 person can concurrently have the same duty" (section 16(1)). Each keeps responsibility for its own duty and must discharge it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1]
2. **Worked together.** Each "must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter" (section 46). Our recommendation: write down who controls which areas and which isolations, and who checks whom (page 33).[1]
3. **Workers consulted too.** So far as is reasonably practicable, each consults the workers who carry out work for it, contractors' workers included, who are, or are likely to be, directly affected by a health and safety matter (section 47(1)): sharing the information, a reasonable chance to raise views and help decide, taking those views into account, and telling them the outcome in good time, with any health and safety representative involved (section 48). Our reading: a meeting between businesses alone, without the workers or their health and safety representative, does not meet it.[1]
4. **Never transferred.** "A duty cannot be transferred to another person" (section 14). A contract term that tries to exclude, limit, or modify a duty, or transfer it, is void (section 272).[1]

On the same plant.

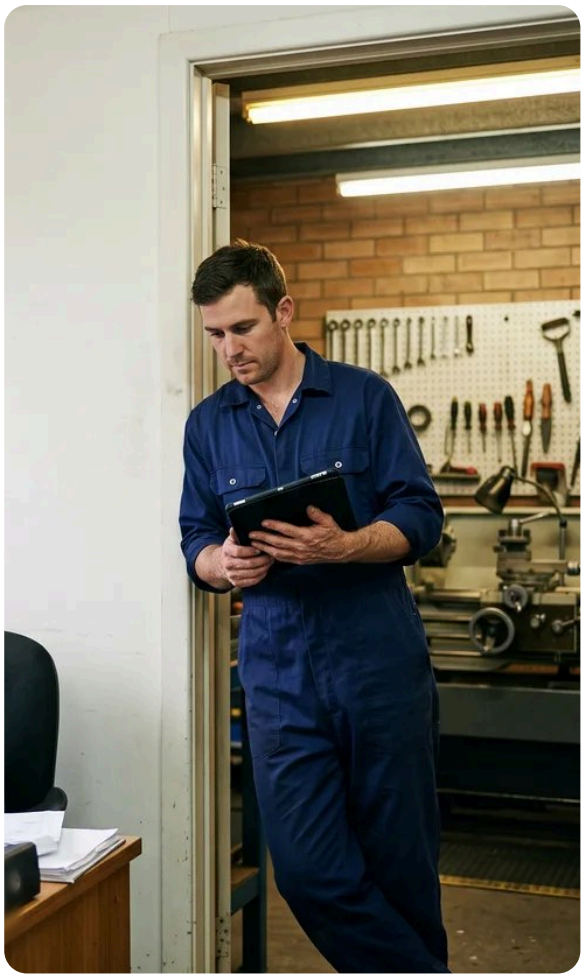
Safe Work Australia's plant code says that where businesses share a workplace or have duties for the same plant, each duty holder should exchange information to find out who is doing what, and work together so risks are eliminated or minimised so far as is reasonably practicable. For a labour hire business, that means agreeing with the host whether its workers could be exposed to hazardous plant, and what each party will do about it.[8] In Victoria, an employer must, so far as is reasonably practicable, consult its employees, and the independent contractors it engages and their employees, on matters it controls or would control but for an agreement, involving any health and safety representative (s 35).[4] Our recommendation: when a crew raises a concern, change the work plan where it is right to, and tell them what changed.



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.

A company director or secretary is an officer, and so is anyone who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business, who can significantly affect its financial standing, or whose instructions or wishes the directors are accustomed to act on, other than advice given in a professional or business capacity (section 4, taking the Corporations Act meaning).[1] A plant manager can meet that test; 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, is engaging, without reasonable excuse, in conduct that exposes someone to a risk of death or serious injury or illness, with gross negligence or recklessness as to that risk. It carries, for an individual such as an officer, a fine, up to 10 years in prison, or both, and for a body corporate a fine (section 31). Safe Work Australia puts the model fines, for the year from 1 July 2026, at up to AU$2,464,000 for an officer and AU$12,321,000 for a body corporate.[1, 6] It is not the ceiling: the model Act leaves room for an industrial manslaughter offence, with a recommended 20 years for an individual (section 30A). Each jurisdiction sets its own offences and penalties: check yours.[1, 6]

Victoria's OHS Act has its own workplace manslaughter offence, in Part 5A (s 39G).[4] There, breaching an employer's duties to its employees or to others (ss 21, 23) carries up to 1,800 penalty units for an individual and 9,000 for a body corporate. And under the model Act, a person must not, without reasonable excuse, insure against a WHS fine, or take the benefit of an indemnity for one, and a contract term that tries to cover one is void (section 272A, a section each jurisdiction may adopt in its own form).[1]

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 a plant. 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 a plant: a briefing when a code your maintenance teams rely on changes, such as the plant or confined spaces code.

b

Understand.

The operations, and their hazards and risks.

At a plant: knowing which lines are isolated for cleaning every night, where forklifts meet people, and which tanks count as confined spaces.

c

Resource.

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

At a plant: one funded contractor process, used every week, not only for the Christmas shutdown.

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 a plant: contractor incidents and near misses reported to the same place as the plant's own.

e

Comply.

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

At a plant: a written route for who notifies the regulator, agreed with every contractor.

f

Verify.

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

At a plant: a regular report that shows the checks happened, not only that the policy exists.

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

What the board can ask for.

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

Contractors who worked this month, by plant, and how many of their workers were checked at the gate, inducted, and licensed for their plant before their first shift.

Licences and insurances expiring in the next 30 days, site refreshers and competency reassessments falling due, by plant and contractor, and any isolation or permit authoriser role left unfilled.

Shutdowns and maintenance windows under way, and a sample of isolations and permits compared with the work being done.

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

04 WHERE THE LAWS DIFFER

One set of model laws, and Victoria.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws."[3] The other states and territories each enact their own version. For a plant, five differences matter most.

Topic	Model WHS laws	Victoria
Isolating plant	Operator controls lock in the off position to disconnect all motive power; if plant must run during maintenance or cleaning, only the person doing it can operate it, or, where someone else must, only a person authorised for it (r 210). De-energised electrical equipment is not inadvertently re-energised during electrical work (page 11).[2]	The same lockable controls; if plant must run during maintenance or cleaning, only the person doing it can operate it (r 101). Permit to work systems stop electrical plant that is isolated, but not physically disconnected, being energised by mistake (r 114).[7]
Maintaining plant	Maintenance, inspection, and, if necessary, testing by a competent person, to the manufacturer's recommendations if any (r 213).[2]	Plant inspected to the extent needed to monitor its risks; records of inspection and maintenance kept for listed plant, such as boilers and pressure vessels (rr 105, 106).[7]
The licence check	No high risk work without the licence (r 81); the business sees written evidence of it first, and keeps a record for at least 1 year (r 85).[2]	No high risk work without the licence, and an employer must not allow an employee to do it without one (rr 128, 129); a current interstate licence is recognised (r 131).[7]
Confined spaces	A test of the space: not designed or intended primarily for people, at normal atmospheric pressure, with a risk from its atmosphere, contaminants, or engulfment; a written risk assessment by a competent person, and a standby person (page 16).[2]	A list of structures, such as a tank, pit, silo, or reaction vessel, with a limited or restricted way in or out; continuous communication from outside, and a record that everyone has left (page 17).[7]
Notifying an incident	To the regulator immediately after becoming aware; a written notice within 48 hours of the regulator's request for one, not of the incident (page 23).[1]	To WorkSafe immediately after becoming aware; a written record within 48 hours after being required to notify (page 23).[4]

In New South Wales, SafeWork NSW says it administers and enforces the Work Health and Safety Act 2011 (NSW) and the Work Health and Safety Regulation 2025 (NSW).[23]

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. Check your own state's law, and its regulator's guidance, before you rely on a number.[1, 2, 3]



05 PLANT AND ISOLATION

Stopped, locked, and proved before anyone reaches in.

A fitter clearing a jam, an electrician on a drive, a cleaner inside a guard: each needs the plant stopped and kept stopped. The Regulations set the outcome. Safe Work Australia's plant code sets out the steps.[2, 8]

> **"The lock-out process is the most effective isolation procedure."**
>
> Safe Work Australia, model Code of Practice: Managing the risks of plant in the workplace, section 4.5[8]

05 PLANT AND ISOLATION

What the Regulations require.

Six duties under the model Regulations, on the business with management or control of the plant, or, for most electrical work duties, the business doing the electrical work; the duty not to re-energise equipment by mistake (r 156) is on every business involved, the plant included (r 153). Each says what must be true; none sets out a lockout procedure step by step.[2]

Controls that lock off.

Operator controls able to be locked into the off position, to disconnect all motive power (r 210(1)(d)).[2]

Running only for the person on it.

If plant must run during maintenance or cleaning, its controls are set so only the person doing that work can operate it, or, where it must be run by someone else, only a person the business authorises for it (r 210(2)(b)).[2]

Guards back before restart.

Where guarding is used and the guarded area must be reached during operation, maintenance, or cleaning, the guard is an interlocked physical barrier or, where that is not reasonably practicable, a barrier that needs tools to remove or a presence-sensing system; if guarding is removed, the plant cannot, so far as is reasonably practicable, restart until it is replaced (r 208).[2]

Stops that stay stopped.

Where plant designed to be operated or attended by more than one person has more than one emergency stop, each is a "stop and lock-off" type: the plant cannot restart until that stop is reset (r 211(1)).[2]

Maintained by a competent person.

Maintenance, inspection, and, if necessary, testing carried out by a competent person, to the manufacturer's recommendations if there are any (r 213).[2]

Electrical work dead, and kept dead.

Equipment tested by a competent person before electrical work, to find whether it is energised (r 155); no work on energised equipment except as r 157 allows (r 154); and once de-energised, it is not inadvertently re-energised while the work goes on (r 156).[2]

Lock, tag, try: the steps in the plant code.

Safe Work Australia's model plant code lists the steps in this order (how codes count: page 12).[8]

1. Shut down the machinery and equipment.
2. Identify all energy sources and other hazards.
3. Identify all isolation points.
4. Isolate all energy sources.
5. Control or de-energise all stored energy.
6. Lock out all isolation points.
7. Tag machinery controls, energy sources, and other hazards.
8. Test by "trying" to reactivate the plant, without exposing the tester or others to risk.

Trying is not proof of zero energy. The code warns that failing to reactivate the plant "does not guarantee all stored energies have dissipated": hydraulic or pneumatic pressure, suspended weight, or compressed springs may need releasing too.[8]

05 PLANT AND ISOLATION

One person, one lock.

Where a fitter, an electrician, and a sanitation crew all work on one line, the plant code's advice on locks and tags is what keeps each of them safe from the others' mistakes.[8]

Each worker, their own lock.

Each worker in the maintenance, cleaning, or repair should have a lock, tag, and key for each isolation point. Or: one padlock on the point, and its keys in a box each worker locks separately.[8]

No spare key.

No duplicate key for any lock, except a master key kept in a secure location and used only in an emergency.[8]

A tag informs; a lock isolates.

A tag should not be used on its own as an isolation device. Locks and tags are removed by the person who applied them, or by the supervisor after consulting the tag's signatory, and otherwise only under a management approved procedure.[8]

Before the work.

Our recommendation, for every job behind an isolation.

Isolate and lock.

- A permit that names each isolation point, and who isolates which system
- The contractor's own lock on every point it works behind, or on the group lock box the approved procedure uses, so each worker has their own protection

Verify, then start.

- The safe energy state verified by the approved method: electrical, pressure, gravity, thermal, and stored mechanical energy, as they apply
- A try alone is not proof of zero energy (page 11)

Who isolates what.

Our recommendation: write down which systems only the plant's own authorised people isolate, such as the incoming electrical supply, steam, and ammonia; which a contractor may isolate itself; and which isolations are shared under one lock box. Link each permit to the isolations it actually depends on, so an isolation another job still needs is not removed when one job finishes. Handing the plant back, shift changes, and test runs are on page 13.

What a code of practice counts for.

The plant, confined spaces, welding, and chemicals codes in this guide are Safe Work Australia's model codes. Where your state has approved a code, a court may use it as evidence of whether a duty was met and of what is reasonably practicable, and another way that gives an equivalent or higher standard is allowed (model Act s 275). Check which codes your state has approved; Victoria has its own compliance codes.[1]

In Victoria.

Operator controls lock in the off position the same way (r 101(1)(d)); if plant must run during maintenance or cleaning, only the person doing it can operate it (r 101(2)); and permit to work systems stop electrical plant that is isolated, but not physically disconnected, being energised by mistake (r 114(c)). The Regulations also make sure a person involved in a plant activity, such as its maintenance, gets the information the employer holds on doing it safely (r 123), and that duty reaches people who are not its employees.[7]

05 PLANT AND ISOLATION

Finished work is not a restart.

A job can be done while the plant stays isolated for a defect, another job, or another permit. Our recommendation: keep four decisions apart, so no paperwork rule forces a lock off early.

1

Work complete.
The job's completion criteria are met, and any outstanding work or defect is recorded.

2

Permit closed.
The work activity closes, and its permit with it.

3

Isolation kept or released.
Any isolation still needed for a defect, further work, or another permit stays on, with a named owner.

4

Restart authorised.
Only after the release process confirms that all work, people, guards, and controls are accounted for.

Handing the plant back.

Under the model Regulations, plant whose guarding was removed cannot, so far as is reasonably practicable, restart until it is replaced (r 208(5)(b)).[2] The plant code adds that plant with damage that poses a risk should be withdrawn from service until the risk is controlled, and that a process should be in place to communicate and consult with affected workers and other businesses before plant shut down for inspection, maintenance, or cleaning is restarted.[8]

Restart and handback: a checklist to adapt.

Our recommendation, as a drafting aid: adapt it to your plant and have it approved.

- Work completed, or outstanding work and defects clearly recorded
- People, tools, temporary equipment, and affected areas accounted for
- Guards, interlocks, and other safeguards restored and checked
- Linked jobs and permits reviewed; isolations still needed identified and assigned
- In a food area, the cleaning, contamination, and quality release checks done (page 20)
- Each lock removed by its owner under the approved procedure; nothing forces an early removal
- Restart authorised by the designated person, and affected workers told
- The controlled restart, and any operating checks, recorded

Shift changes and test runs.

Our recommendation: when a job runs past a shift, or the plant must be energised for a test, follow one short exception route.

1
Name the authorised coordinator for the isolation.

2
Account for every affected worker and every linked permit.

3
Hand the isolation over lock for lock, so no one is unprotected in between.

4
For a test, set the controlled boundary and who may be inside it.

5
Restore and verify the isolation before work resumes.

05 LICENCES

Licensed for the plant they touch.

Forklifts, boilers, boom-type elevating work platforms of 11 metres or more, many cranes, and refrigerant work each need a licence for the person who does it; some plant needs registering too.



High risk work licences.

A person must not carry out a class of high risk work without a licence for that class (r 81). A business must not direct or allow a worker to do it unless it sees written evidence of the licence, and it keeps a record of that evidence for at least 1 year after the work (r 85). Classes a plant often needs (Schedule 3):[2]

- Forklift truck, and order-picking forklift truck
- Boom-type elevating work platform, boom of 11 metres or more
- Standard and advanced boiler operation
- Steam turbine operation, 500 kilowatts or more, of the kinds Schedule 3 lists
- Scaffolding, rigging, and dogging
- Cranes by class, including bridge and gantry cranes run from a cabin or control station, or remotely with more than 3 powered operations

A licence is not needed for work solely to maintain, service, repair, test, or move the plant within the workplace, while it runs without a load other than calibration weights (r 82(2)).[2] In Victoria, an employer must not allow an employee to do high risk work without the licence (r 129), and its maintenance exception does not cover scaffolding, dogging, or rigging work, or loading plant onto or off a vehicle (r 130).[7] Neither exception is general: check the task against the rule.

Registered plant.

Registrable plant, such as boilers and pressure vessels at hazard level A, B, or C (serially produced vessels and gas cylinders excepted), lifts, and mobile cranes over 10 tonnes, is registered before it is commissioned (r 234(2), Schedule 5 Part 2). Some plant designs must be registered too (r 243, Schedule 5 Part 1), separately from each item. Whoever manages or controls registered plant keeps a record of its tests, inspections, maintenance, and alterations while it is used, and hands it on with control (r 237).[2] In Victoria, the employer keeps inspection and maintenance records for listed plant, boilers and pressure vessels among them, while it controls them (r 106).[7] Our recommendation: a contractor who maintains registered plant adds to that record, and a named person checks the registration and the licences before plant is commissioned or used.

Refrigeration: a licence from Commonwealth law.

The rules cover refrigeration and air conditioning equipment that uses CFC, HCFC, HFC, PFC, or halon (r 110). Work on it means anything with a refrigerant, or a component of the equipment, that involves a risk of refrigerant being emitted, such as installing, servicing, or maintaining it, whether or not refrigerant is present; doing it without a refrigerant handling licence that entitles the person to that work is an offence (r 111). A business that acquires, holds, or disposes of bulk refrigerant needs a separate refrigerant trading authorisation (r 112).[12, 13] Our reading: an ammonia system uses none of these refrigerants, so these licences do not apply to it; the WHS or OHS laws still do (pages 11 and 15), and your state's dangerous goods or trade licensing rules may too.[12] Our recommendation: record the refrigerant and the task, including whether it installs, services, or maintains the equipment or could release refrigerant, before you set the evidence you need.

06 HOT WORK AND CHEMICALS

Fire, chemicals, and spaces nobody should be in.

Process plants hold fuel, sparks, and spaces never built for people. A contractor arriving for one day's work can meet all three.



Hot work.

No model regulation is headed hot work. Its rules sit in the hazardous atmosphere duties: an atmosphere is hazardous where, among other things, flammable gas, vapour, mist, or fumes exceed 5% of the lower explosive limit, the figure published in the model WHS Regulations of 2025, or combustible dust is present in a quantity and form that would result in a hazardous area (r 51); the risk of an ignition source in it is managed, unless the ignition source is part of a deliberate process (r 52), and the welding code treats welding sparks as ignition sources to manage; and flammable and combustible substances are kept to the lowest quantity reasonably practicable (r 53).[2]

A documented permit.

The welding code says to document specific procedures, including the issue of a "hot work permit", and points to AS 1674.1 for more.[9]

Fuel away from sparks.

Its controls include fire-resistant barriers, a work area free of rubbish, paper, or dust, no flammables stored near the welding, and fire-fighting equipment kept close.[9]

Dust is fuel too.

The chemicals code: dust explosions are a significant risk in some workplaces, often overlooked, and dust can be a hazardous atmosphere like flammable vapour.[11]

Hazardous chemicals.

The business manages the risks of using, handling, generating, or storing a hazardous chemical (r 351). It keeps the current safety data sheet readily accessible (r 344), and a register of the chemicals, with each sheet, readily accessible to workers and to anyone else likely to be affected (r 346).[2]

Contractors' chemicals.

The chemicals code: if you engage a contractor whose work involves hazardous chemicals, consult the other duty holders on site so they know about it and cooperate.[11]

Chemicals inside the plant.

Chemicals held in plant that is part of a manufacturing process, such as a piping system, are identified too, so maintenance and cleaning can be controlled.[11]

Spills kept in.

Where a spill or leak of a solid or liquid hazardous chemical is a risk, a spill containment system, so far as is reasonably practicable, in each part of the plant where it is used, handled, generated, or stored (r 357).[2]

In Victoria, the employer keeps the safety data sheets and a register (rr 155, 156, 162), identifies a hazardous substance in a pipe or process plant to employees who may be exposed (r 160), and these duties reach the independent contractors it engages, for matters it controls or would control but for an agreement (r 8; Act s 21(3)).[7] Our recommendation, everywhere: a contractor's safety data sheets arrive before its chemicals do.

06 CONFINED SPACES

Tanks, silos, and pits: classify first.

A tank is cleaned, a silo is inspected, a pit is pumped out. Whether each is a confined space decides what must happen before anyone climbs in.

Under the model laws.

A confined space is an enclosed or partially enclosed space not designed or intended primarily for people to occupy, at normal atmospheric pressure while anyone is in it, with a risk from its atmosphere, contaminants, or engulfment (r 5). A tank, silo, or pit is not one by default: classify the space and the task. Where it is one, six things come before entry. The written entry permit, completed by a competent person, records them and who may enter (r 67); it does not replace them.[2]

Assessed.

A competent person's written risk assessment (r 66).[2]

Cut off.

The risk from connected plant and services, such as a clean-in-place or product line, eliminated or, if that is not reasonably practicable, minimised so far as is reasonably practicable (r 70).[2]

Air to breathe.

Contaminants purged or ventilated so far as is reasonably practicable, never with pure oxygen or an oxygen-enriched mixture; a safe oxygen level while anyone works in it, or, where that is not reasonably practicable and oxygen is below 19.5%, the floor published in the model WHS Regulations of 2025, air-supplied respiratory equipment for each worker in it (r 71).[2]

No fire risk.

Flammable gas, vapour, or mist kept below 5% of its lower explosive limit, so far as is reasonably practicable; if not, workers out at 5% unless a continuous detector is used, and out at once at 10%, the limits published in the model WHS Regulations of 2025 (r 72).[2]

Watched.

Continuous communication with the worker from outside, and a standby person monitoring conditions (r 69).[2]

Rescue ready.

First aid and rescue procedures set, practised, and started from outside the space (r 74).[2]

Test the air, and keep testing.

The risk assessment considers the atmosphere and how it may change (r 66), and air monitoring is required wherever you are not certain on reasonable grounds that an exposure standard is met, or it is needed to tell whether there is a risk to health (r 50).[2] The confined spaces code says air monitoring should be done by a competent person with a suitable, correctly calibrated gas detector.[10]

Our recommendation. A competent person first decides whether entry can be avoided. Then oxygen, flammable gas, and the toxic contaminants the space may hold, cleaning chemical residues included, are tested before entry and again as the assessment says, and each is a separate check. A generic checklist is not an entry authorisation: the permit is (page 17).

06 CONFINED SPACES

What the confined spaces code adds.

Three points from Safe Work Australia's model code (how an approved code counts: page 12). [10]

Isolated to zero.

The confined spaces code: isolate all potentially hazardous plant and services before anyone enters, reduce stored energy to a zero energy condition, and keep isolations until every worker has left. [10]

The key stays with the worker.

The person who places a lock keeps its key; spare keys are kept out of reach except in an emergency, and the tag shows that a person is inside. [10]

No sparks next door.

No ignition source goes into a confined space where it could cause a fire or explosion (r 73); the code warns of hot work in areas next to a space holding a flammable atmosphere. [2, 10]

In Victoria.

A confined space is a space in a listed structure, such as a tank, pit, silo, or reaction vessel, that has a limited or restricted way in or out, is at normal atmospheric pressure while anyone is in it, and holds, or is likely to hold, a harmful atmosphere, an unsafe oxygen level, or a stored substance, other than a liquid, that could cause engulfment (r 5). The employer issues an entry permit for one space, naming who may enter and who is assigned to communication and emergencies (r 63); keeps continuous communication from outside (r 65); keeps a written record that everyone has left (r 68); and keeps the permit until the work is done, or for 2 years after a notifiable incident (r 64). [7]

What the entry permit records.

The law sets the permit's minimum contents (r 67; in Victoria, r 63). Our recommendation: these on top, so the permit shows the space was safe to enter, not only that a form was filled in.

On the permit	What it shows
The space and the task	Why entry could not be avoided, and the work to be done inside
Contaminants and services	What the space held, cleaning residues included, and each connected line isolated, with its owner
The tests	Where and when each test was taken, oxygen, flammable gas, and toxic contaminants separately, the results, and the instrument and its calibration
Ventilation and monitoring	How the space is ventilated, and how often the air is tested again while anyone is inside
Stop and get out	The readings or events that mean everyone leaves at once, and who calls it
People and rescue	Who may enter, the standby person, entry and exit times, and the rescue ready outside



07 FOOD PLANTS

In a food plant, the hygiene rules reach every contractor.

A fitter on a filler, a cleaner on a slicer, a pest controller in the store: each can contaminate food. The Food Standards Code makes the food business take all practicable measures so that everyone on its premises does not contaminate food.[14]

> **"'All people' includes food handlers, tradespeople, visitors and members of the public."**
>
> Food Standards Australia New Zealand, Safe Food Australia, 4th edition, on Standard 3.2.2, clause 18(3)[19]

07 FOOD PLANTS

Who the Code binds.

Standard 3.2.2 applies to all food businesses and food handlers in Australia (clause 2), and each state's and territory's Food Act enforces the Code. It binds the business and, for their own hygiene, the food handlers. [14, 15, 18]

The business, for everyone.

All practicable measures so all people on its premises do not contaminate food, have no unnecessary contact with ready-to-eat food, and do not spit, smoke, or use tobacco where food or food-contact surfaces are unprotected (Standard 3.2.2, cl 18(3)). [14]

A contractor can be a food handler.

A food handler handles food, or surfaces likely to come into contact with food, for a food business (Standard 3.1.1, cl 1), and must take all reasonable measures not to compromise the safety of food through them, keep outer clothing clean, cover dressings, and wash hands (cls 13, 15). Our reading: a crew cleaning food-contact surfaces fits. [14, 15]

Sick means off the line.

A food handler with a symptom such as vomiting, diarrhoea, or fever, or a foodborne disease, reports it to their supervisor and does not handle food where contamination is reasonably likely (cl 14); the business keeps them off it (cl 16). [14]

What FSANZ's guide suggests.

Food Standards Australia New Zealand's guide is not legally binding, but it reads clause 18(3) this way: where possible, keep everyone except food handlers out of food areas; supervise people with a legitimate reason to be there; and in food manufacturing areas, ask them to wear protective clothing and hair coverings, wash their hands, and wash their shoe soles. [18, 19]

Maintenance and pests are food safety work.

The business keeps its premises, fixtures, fittings, and equipment clean and in a good state of repair and working order, and food-contact surfaces clean and sanitary whenever food that touches them is likely to be contaminated (cls 19 to 21); FSANZ's examples of what repair prevents include flaking paint, broken glass, and leaking pipes. It takes all practicable measures to keep pests out and stop them harbouring (cl 24), and premises are designed to be cleaned and, to the extent practicable, to keep pests out and give them no harbourage (Standard 3.2.3, cl 3). [14, 17, 19] FSANZ's examples include keeping chemicals for cleaning and pest control separate from food processing areas. [19]

Two more food standards to place.

A dairy processor must also control its food safety hazards by implementing a documented food safety program (Standard 4.2.4, cl 13); our recommendation: put the contractor rules in it. [22] Standard 3.2.2A applies only to a category one or two business: a caterer or food service that processes unpackaged potentially hazardous food into food that is both potentially hazardous and ready to eat, or a business that offers such food for retail sale, received or opened unpackaged, without making or processing it other than slicing, weighing, repacking, reheating, or hot-holding it. [16] Our reading: making food, or packing it, does not settle either category; assess each activity on site, such as a staff canteen or a factory outlet, against the definitions.

OUR RECOMMENDATION

Put the food-area rules in every contractor's induction, clean tools before they enter, and supervise anyone who is not a food handler. A tidy area is not a release: see the next page.

07 FOOD PLANTS

Handing a food area back.

After maintenance in a production room, the question is not whether the area looks tidy. It is whether product and food-contact surfaces are ready for production, and who says so.

What to accept before production restarts.

Our recommendation: set the criteria by risk for each area, not as one list for every plant. Each criterion names the evidence, and an authorised production or quality representative accepts the area and makes the release decision.

Check	What good looks like	Evidence
Tools and fragments	Every tool, part, fastener, and offcut taken in is counted back out; no glass, hard plastic, or metal fragments left on or near the line	The tool count, signed by the contractor and the area owner
Lubricants and chemicals	Only lubricants and chemicals approved for the area used, and any residue removed from food-contact surfaces	The products used, against the site's approved list
Allergens	No cross-contact from tools, clothing, or materials brought from another area or line	The allergen check in the site's own procedure
Cleaning and sanitising	Food-contact surfaces cleaned and sanitised after the work, by the site's method	The clean and its verification, such as a swab or visual check
Temperature controls	Any cold room, freezer, or process temperature the work touched is back within its limits	The readings, and who checked them
Exposed product	Any product in the area during the work is assessed, held, or disposed of	The decision, and who made it

Illness reports are not for every file.

A food handler, a contractor included, reports a symptom or a foodborne disease to their supervisor (page 19). The food business must ensure that report is not disclosed without the food handler's consent, except to the proprietor or an authorised officer, and is used only to address the risk of food contamination (Standard 3.2.2, cl 18(2)). [14, 24]

Our recommendation. The supervisor and the gate see a status, such as "not to work in food areas until cleared", never the diagnosis. The underlying report stays out of the general contractor record, with access limited and logged.

08 ON THE DAY

What the paperwork will not show.

A prequalified contractor says nothing about tonight's wash-down, the forklift aisle beside the job, or the electrician alone in the switch room at 3 am.

Control	What it means on site	Status and source
After hours and alone	Night maintenance, security patrols, and cleaners often work alone. Remote or isolated work needs its risks managed and a system of work that includes effective communication with the worker (r 48).[2] Our recommendation: someone watches the check-ins, and a missed one is escalated at once.	LAW r 48 GOOD PRACTICE who watches
Live electrical work	Allowed only on the grounds r 157 lists, such as testing, and only after a risk assessment, a clear work area, the isolation point marked, and authorisation by the business doing the work after consulting the business that manages or controls the workplace (r 158); the immediate area is kept to people the business has authorised (r 159); and the work is done by a competent person with suitable tools and equipment, under a safe work method statement, with a safety observer unless it is only testing assessed as no serious risk (r 161).[2] Victoria's OHS Regulations have no equivalent; your state's electrical safety law, which this guide does not cover, may add its own rules: read it, and check the electrician's and the business's licences.	LAW rr 157 to 159, 161 GOOD PRACTICE the licence checks
Wet and dusty areas	Electrical equipment supplied through a socket outlet and used where moisture, heat, vibration, mechanical damage, corrosive chemicals, or dust are likely to damage it is regularly inspected and tested by a competent person (r 150).[2] Our recommendation: contractors' leads and tools are in date before they enter a wash-down area, and a current tag does not clear visibly damaged equipment; check where the law requires a residual current device too (r 164).	LAW r 150 GOOD PRACTICE the gate check
Forklifts and people	Under the model Regulations, whoever manages or controls powered mobile plant manages the risk of it colliding with any person or thing (r 214), must ensure it does not collide with pedestrians or other powered mobile plant, and fits a warning device where a collision is possible (r 215(4), (5)).[2] In Victoria, the risks to be controlled include colliding with pedestrians (r 109), and an industrial lift truck is fitted with warning devices (r 113).[7] Our recommendation, everywhere: contractors' walking routes kept apart from forklift aisles, and agency drivers' licences sighted (page 14).	LAW rr 214, 215; Vic rr 109, 113 GOOD PRACTICE the routes

08 ON THE DAY, CONTINUED

Control	What it means on site	Status and source
Emergencies	Every workplace has an emergency plan, kept effective, with its procedures tested and put into effect in an emergency (r 43). Where Schedule 11 chemicals exceed the manifest quantity, the plan goes to the primary emergency service organisation (r 361).[2] Our recommendation: every contractor on the sign-in list, and briefed on the muster point.	LAW rr 43, 361 GOOD PRACTICE the briefing

Three rules for every contract.

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

Anyone can stop the work. Restart takes more.

Our rule: anyone who sees work outside the plan can stop it. That adds to a worker's right to cease, or refuse to carry out, work if they have a reasonable concern that it would expose them to a serious risk from an immediate or imminent exposure to a hazard (s 84), and a trained health and safety representative's power to direct a worker in their work group to cease such work, after consulting the business and trying to resolve it, unless the risk is too serious and immediate to wait (s 85). Our rule for restart: once the hazard is dealt with, and those affected consulted.[1]

When the job changes.

Our recommendation: treat a guard repair that becomes a rebuild, or a valve swap that becomes a line change, as a new job. Check the isolations, the permits, the licences, and whether it is now construction work (page 27) again.

When the check cannot be done.

Our recommendation: confirm identity and evidence another way, such as a call to the site office; without the evidence, safety-critical work does not start, and a screenshot does not prove today's status. A call does not replace the written evidence of a high risk work licence the plant must see first (page 14).[2]

09 WHEN SOMETHING GOES WRONG

Call first, approve later.

A steam line lets go during a maintenance window. Protect life and call 000 first. Then the regulator hears immediately, by the fastest means, without waiting for anyone's approval.[1]

Where adopted. The 2025 model changes marked below apply only where your state or territory has adopted them into its own law: check yours before you rely on them.[21]

Topic	Model WHS laws	Victoria
Notify at once	A death, a serious injury or illness, or a dangerous incident, and, under the 2025 changes where adopted, a violent incident (s 35). A dangerous incident immediately or imminently exposes a person to a serious risk, and includes an uncontrolled escape, spillage, or leakage of a substance; an uncontrolled escape of gas or steam, or of a pressurised substance; an electric shock; the failure of plant that must be authorised; and, under the 2025 changes, a mobile plant incident, such as a forklift colliding with a person or thing (s 37). Lists as at 5 December 2025: yours may differ.[1, 21]	A death, and injuries that need immediate treatment, such as an amputation or an electric shock (s 37(1)). Also an incident that exposes a person to a serious risk from, among others, an uncontrolled escape, spillage, or leakage of any substance; an implosion, explosion, or fire; an electric shock; or the failure of plant whose design must be registered (s 37(2)).[4]
Absences and suicides	Under the 2025 changes, where adopted: a worker's absence of 15 or more consecutive days from a work-related injury or illness, or one the worker tells the business a doctor expects to last that long, notified within 14 days of becoming aware of it; and a suicide or attempted suicide, suspected included, of a worker with a listed link to the work or workplace, or of another person at a workplace where it is a foreseeable risk, notified immediately (ss 35A, 35B, 38(1)).[1, 21]	No separate category for absences or suicides; a death, or a listed injury, from an incident at the workplace is still notifiable (ss 37, 38).[4]
When and how	To the regulator immediately after becoming aware, by the fastest possible means, by phone or in writing; a written notice within 48 hours of the regulator's request for one, not of the incident (s 38).[1]	To WorkSafe immediately after becoming aware, by the employer or self-employed person that manages and controls the workplace (s 38(1)); a written record within 48 hours after being required to notify (s 38(3)).[4]
The site	The business with management or control of the workplace preserves the site, so far as is reasonably practicable, until an inspector arrives or directs; where your state has adopted the 2025 changes, until an inspector releases it, with evidence preserved too. Either way, it may act to help an injured person or make the site safe (s 39).[1, 21]	The site is not disturbed until an inspector arrives or directs, except to protect health or safety, help an injured person, or make it safe (s 39).[4]
Who tells whom	Under the 2025 changes, where your state has adopted them, the business that notifies and the business with management or control of the workplace tell each other, so far as is reasonably practicable (s 39A).[1, 21] Agree who makes the call; where adopted, one notice is enough for the same event (s 38(1A)), and each business with the duty stays responsible for making sure it is given (ss 14, 38(1)).[1]	No equivalent rule. Our recommendation: agree in the contract who notifies, and who tells whom.
The record	Kept for at least 5 years from the day notice is given (s 38(7)).[1]	A copy of the written record kept for at least 5 years (s 38(4)).[4]

09 WHEN SOMETHING GOES WRONG

The first hour, in order.

Life comes first, and the regulator hears straight after, not when a manager has signed off. Section numbers are the model Act's; Victoria's are on page 23.

1
Protect life. Call 000, give first aid, and start the rescue the permit names.

2
Make it safe. Stop the work and isolate the hazard; then, so far as is reasonably practicable, keep the site undisturbed until an inspector arrives, directs, or releases it, except to help an injured person or make it safe (s 39; page 23). [1]

3
Notify. The regulator, immediately after becoming aware, by the fastest possible means, without waiting for internal approval (s 38). [1]

4
Confirm and keep. Check the agreed notifier did notify; keep the reference and the record for at least 5 years (s 38(7)). [1]

If food may be contaminated.

Our recommendation. The contractor's part is to stop, tell, and give evidence; the site's food incident and recall procedure decides the rest. Recall and food regulator notification rules are outside this guide.

1
Stop and tell. The contractor stops and tells the site's named food safety lead at once.

2
Hold. Affected product is stopped and kept apart, with its batch and distribution details.

3
Decide. The food safety lead assesses any regulator notification, withdrawal, or recall, and records the decision.

4
Evidence. The contractor records what it saw, what it used, and when, for the site's file.

09 TEMPLATE

The incident card: one for each plant.

Our recommendation: fill in the right-hand column, put the card in the site office and the induction, and test it once a year on a night shift with a contractor. Keep health details off the copies that go round.

On the card	What it says	This plant
Site and access	The plant's address, the gate responders use, who meets them, and any key or code	
Emergency	000, first aiders, the muster point, and the rescue for each confined space or high task	
The regulator	Its phone line and online route, and the food regulator's, for the food safety lead	
Category and clock	Immediate notice; a written notice within 48 hours of being asked (in Victoria, of being required to notify); 14 days for an extended absence where adopted (page 23)	
Caller and backup	Who decides and makes the call, their backup, and each contractor's notifier	
Notified	The time the regulator was told, the reference number, and who checked it was done	
Preserve the site	Who keeps it undisturbed, and the exceptions: helping the injured and making it safe	
Who tells whom	The other businesses told, by whom and when (page 23)	

10 A WORKED EXAMPLE

A weekend maintenance window at a food plant.

A dairy and juice plant stops two lines from Friday night to Monday morning. A maintenance contractor brings fitters and a welder, some from a labour hire agency; refrigeration, electrical, sanitation, and pest control contractors work alongside. Numbers are the model laws'; adapt them to your state (page 9).

What is live	Why	What gets checked and kept
The isolations	Each fitter and electrician fits their own lock at each isolation point, or on the group lock box, and the safe energy state, electrical, steam, air, and gravity, is verified by the approved method before work; a try alone is not proof (plant code, s 4.5).[8] De-energised electrical equipment is not inadvertently re-energised while electrical work goes on (r 156, page 11), and plant with guards off cannot, so far as is reasonably practicable, restart until they are back (r 208(5)(b)).[2]	Each lock and its owner, the verification, any isolation kept on and its owner, and each release
The cool room	The cool room runs on an HFC refrigerant, and the job, replacing a valve on its refrigerant circuit, could release it: the technician holds a refrigerant handling licence that entitles them to that work (rr 110, 111). The contractor brings bulk refrigerant, so it holds a refrigerant trading authorisation (r 112).[12]	The refrigerant and the task recorded; the licence and the authorisation, sighted
The hot work	The welder repairs a frame beside the milk powder room. Combustible dust can make a hazardous atmosphere (r 51), and the risk of an ignition source in it is managed (r 52, which the welding code applies to welding sparks); the welding code's hot work permit records the controls.[2, 9]	The permit, and our recommended fire watch during and after
The tank	The sanitation crew must go inside a juice tank last cleaned in place with caustic and sanitiser. It is classified first (page 16); as a confined space, it needs a written risk assessment, the clean-in-place and product lines isolated, the tank purged or ventilated, a safe oxygen level and no flammable atmosphere, a standby person, practised rescue, and an entry permit (rr 66 to 74); air monitoring where you are not certain on reasonable grounds that an exposure standard is met (r 50). Our recommendation: oxygen, flammable gas, and the cleaning chemicals tested separately before entry and as assessed.[2]	The assessment, the test readings, the permit, and the record that everyone left
The food rules	The plant takes all practicable measures so that no one in the production rooms contaminates food (Standard 3.2.2, cl 18(3)); on our reading, the sanitation crew are food handlers, with their own hygiene duties (Standard 3.1.1, cl 1; Standard 3.2.2, cl 15).[14, 15]	The induction, and the area accepted for production by the quality lead against the handback criteria (page 20)

10 A WORKED EXAMPLE, CONTINUED

What is live	Why	What gets checked and kept
The forklift	A labour hire driver moves pallets out of the way: the plant sees written evidence of the forklift licence first (page 14).[2]	The licence, sighted, and kept at least 1 year
If something goes wrong	Life first: 000, first aid, and the rescue. An uncontrolled escape of steam that exposes someone to a serious risk is a dangerous incident, notified to the regulator immediately after (page 23).[1]	The notice, its time, and the reference
Is it construction work?	Three separate questions, each with its own answer. Is it construction work? Repairing or maintaining a structure, other than minor work, is (r 289); routine plant maintenance may not be. Is any of it high risk construction work, such as work in a confined space or near refrigerant lines? That needs a safe work method statement before it starts (rr 291, 299). Is it a construction project? Only at AU$250,000 or more under the model laws (AU$350,000 in Victoria; SafeWork SA says AU$450,000 in South Australia), and then the business that commissions it is the principal contractor, unless it engages and authorises another business as principal contractor (rr 292, 293). Check your own state's threshold.[2, 7, 25]	Each of the three decisions, each statement, and who is principal contractor

Who releases what, on Monday morning.

An illustration, not a rule: the roles are this example plant's. Each release has one named role, and nothing restarts until all of them have signed.

Release	Who decides	On the evidence of
Each isolation	The plant's maintenance supervisor, with each lock's owner	Every lock off by its owner, or kept on for a named defect and owner
The tank	The permit issuer	The record that everyone left, and the tank closed up
The cool room	The plant's engineer, with the refrigeration contractor's lead	Leak check done and temperatures back within limits
The production rooms	The quality lead	The handback criteria met (page 20)
Restart of each line	The production manager	All of the above, and the line's crew told

On paper, each of these lives in a different folder. Joined up, the maintenance manager sees on Friday afternoon who is cleared for which job, which isolations and permits are open, and who is inside the plant on Sunday night.

11 THE RECORD

What to hold for every contractor.

Four levels: the company, the worker, the plant, and the visit (page 29). Each row says whether the law, a regulator, a contract, or good practice asks for it.

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

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

Level	What to hold	Status and source
The company	The prequalification: its safety record and capability for the work, reviewed on a change of scope, an incident, or a lapse	**GOOD PRACTICE**
	What each side told the other about the work, the plant, and its chemicals, and who isolates, authorises, and reports what	**LAW** s 46 (consult, cooperate, coordinate) [1] **REGULATOR** the plant and chemicals codes [8, 11]
	Safety data sheets for any hazardous chemical it brings, added to your register before the chemical arrives	**LAW** rr 344, 346 (the sheets and the register) [2] **GOOD PRACTICE** before arrival
	A refrigerant trading authorisation, where it acquires, holds, or disposes of bulk refrigerant	**LAW** r 112, Commonwealth (the contractor's duty) [12] **GOOD PRACTICE** a copy on file
	Workers compensation: its own policy or self-insurance under its state's scheme; public liability and any other cover the contract asks for, with expiry dates	**LAW** each employer's state scheme (not covered in this guide) **POLICY** the contract's insurance terms
The worker	The induction to this plant: its hazards, its isolation rules, its emergency route, and its food-area rules, dated, with its refresher due date	**LAW** suitable and adequate information, training, and instruction (r 39) [2] **GOOD PRACTICE** the content
	Written evidence of any high risk work licence, sighted before the work, and kept at least 1 year after it; held as separate fields: its class and conditions, its expiry, the date it was verified, and the tasks it covers; reviewed again on a suspension, an incident, or a change of scope, and a renewal reviewed, not approved on arrival	**LAW** r 85(1) and (4) [2] **GOOD PRACTICE** the separate fields, the status check, and the reviews
	A refrigerant handling licence that entitles the worker to the task, where the work installs, services, or maintains equipment using a fluorocarbon refrigerant or halon, or could release it (page 14); any electrical licence the work needs under your state's law	**LAW** r 111, Commonwealth (the worker's duty) [12]; state electrical law (not covered in this guide) **GOOD PRACTICE** sighting it
	Competence for the plant they maintain, with its reassessment date, and authorisation for any isolation or permit they will hold. Our recommendation: your site rules say which work an overdue item stops; it need not bar the worker from the site	**LAW** page 11 (a competent person) [2] **GOOD PRACTICE** the authorisation list

11 THE RECORD, CONTINUED

The plant and the visit.

What each plant holds, and what each day adds to the record.

Level	What to hold	Status and source
The plant	A register of plant needing regular inspection and maintenance, with the isolation procedure for each item; the records for registered plant	REGULATOR the plant code, s 3.5 [8] LAW r 237 (registered plant) [2]
	The hazardous chemicals register, with each current safety data sheet; the confined spaces identified; the food areas and their rules	LAW r 346 (the register) [2] GOOD PRACTICE the lists
The visit	Sign in and out by area, so everyone can be found in an emergency; the permits, isolations, and locks open and closed; the check-ins for anyone alone; incidents, who was told and when, and the reference	LAW pages 11 to 23 GOOD PRACTICE the log

How long to keep each record.

These are floors, not destruction dates: keep each for the longest of the minimum, your contract, and any hold for an incident or claim.

Record	Minimum	Kept by
High risk work licence evidence	At least 1 year after the work (page 14) [2]	The business that directed or allowed the work
Confined space assessment and permit	The assessment at least 28 days after the work, the permit until the work is done, and both at least 2 years after a connected notifiable incident; training records 2 years (rr 76, 77). Victoria: the permit until the work is done, or 2 years after a notifiable incident (r 64) [2, 7]	The business that prepared the assessment or issued the permit; in Victoria, the employer that issued the permit
Live electrical work risk assessment and safe work method statement	The risk assessment at least 28 days after the work is finished, the statement until the work is finished, and both at least 2 years after a connected notifiable incident (r 162) [2]	The business that prepared them, the business doing the electrical work
Air monitoring results	30 years after the record is made (r 50(2)) [2]	The business that monitored
Health monitoring reports	At least 30 years, as a confidential record (r 378) [2]	The business that engaged the worker
Registered plant records	While the plant is used, then handed on with control (r 237). Victoria: inspection and maintenance records for listed plant while in control (r 106) [2, 7]	Whoever manages or controls the plant
Notifiable incident record	At least 5 years (model Act s 38(7); Victoria s 38(4)) [1, 4]	Each business with the duty to notify

Linked, not one open file.

Health monitoring, illness reports, and incident records hold personal information about other businesses' workers. Our recommendation: link the records rather than pool them; the gate sees a status, not the document; each team sees what its role needs; access is logged; and do not assume a privacy exemption for your own employees' records covers your contractors' workers.

11 CHECKLIST

Before a contractor starts.

Run it for each plant and each contract, and tick a line only when you can point to the evidence. Read your state's law beside it (page 9).

	Check	Owner	Date and evidence ref.
	Settle the law and the roles		
☐	We know which WHS or OHS law applies at this plant, and which food law, if we make food. **Law, page 9** **Law, page 19**		
☐	We have written down who may isolate which system, who authorises permits, and who signs plant back after work. **Good practice, page 12** the authorisation list		
☐	We have answered three questions separately: is it construction work; is any of it high risk construction work, needing a safe work method statement, and which contractor owns each; and is it a construction project, at our state's threshold, needing a principal contractor. **Law, page 27** the decision		
☐	Each confined space is identified and classified, and so is each area where hot work is restricted. **Law, pages 15 and 16 (managing the risks)** **Good practice** the lists		
	At prequalification and contract		
☐	The contractor's safety record and capability for the work were checked. **Good practice** the assessment		
☐	Each side told the other about the work, the plant, and its chemicals, and the contract says who isolates, authorises, and reports what. **Law, s 46, page 6** **Regulator, the codes**		
☐	Affected workers, contractors' workers included, and any health and safety representative were given the information and a chance to raise views before decisions, and told the outcome; in Victoria, by its own route. **Law, ss 47, 48; Vic s 35, page 6** what was shared, and the outcome		
☐	Safety data sheets for any chemical it brings are on our register; any refrigerant trading authorisation is on file. **Law, page 15 (the sheets and the register)** **Good practice** the authorisation on file, page 14		
☐	Its workers compensation cover, and the public liability and other cover the contract asks for, are on file with dates, and so are those of any tier below it. **Policy** the contract's insurance terms		

11 CHECKLIST, CONTINUED

Each worker, each visit, and the officers.

Checks for each worker before they start and at every visit, and standing checks for the officers.

	Check	Owner	Date and evidence ref.
	Before the first shift		
☐	Each worker, of every tier, is inducted to this plant, its isolation rules, its emergency route, and its food-area rules. **Law, r 39, page 28** the induction record		
☐	Written evidence of each high risk work licence is sighted, and its class and status checked; for refrigerant work, the refrigerant and the task are recorded and the licence that covers them is sighted. **Law, page 14 (the evidence, kept 1 year)** **Good practice** the status check and the refrigerant licence sighted		
☐	Each worker who maintains plant is competent for it, and authorised for any isolation or permit they will hold. **Law, page 11 (a competent person)** **Good practice** the list		
	At the gate, each visit		
☐	Every worker signed in and out by area, with induction and licence status checked, not only sighted. **Good practice** the status check		
☐	Tools and leads for wet or dusty areas are in test, and food-area entrants are gowned and washed. **Law, r 150, page 21; Standard 3.2.2 cl 18(3) (all practicable measures)** **Regulator, FSANZ's guide (gowning and washing), page 19**		
☐	Where a check could not be done, safety-critical work did not start without the evidence, and the decision was recorded. **Good practice, page 22** who decided, and why		
	If something goes wrong, and standing		
☐	The plant's incident card is current, and each contractor knows who notifies, and who tells whom. **Law, page 23 (notifying)** **Good practice** the card, reviewed		
☐	Officers receive a regular report that verifies the checks happen: lapses, open actions, and a sample of isolations and permits checked against the work. **Good practice; verifying is part of due diligence, page 8** the report, dated		
☐	Every action raised by these checks has an owner and a due date, and is closed only when someone has seen that it was done. **Good practice** the action and its evidence		

11 CHECKLIST, CONTINUED

On the job.

Checks for each job, isolation, and permit, through to the restart.

	Check	Owner	Date and evidence ref.
	On the job		
☐	Each isolation: every energy source isolated, stored energy controlled, each worker's own lock on, or on the group lock box, and the safe energy state verified by the approved method; a try alone is not proof. **Law, page 11 (the outcome)** **Regulator, the plant code (the steps)**		
☐	A job that runs past a shift, or a test that needs the plant energised, follows the exception route: a named coordinator, every worker and linked permit accounted for, a lock-for-lock handover, and the isolation verified again before work resumes. **Good practice, page 13** the handover record		
☐	Hot work only under a permit, with fuel and dust cleared, fire equipment close, and the area checked after. **Law, rr 51, 52, page 15** **Regulator, the welding code (the permit)**		
☐	A confined space entered only under its permit, after the written assessment, with connected plant isolated so far as is reasonably practicable; purged or ventilated, and oxygen, flammable gas, and toxic contaminants tested separately before entry; a safe oxygen level kept or, where that is not reasonably practicable and oxygen is below 19.5%, the floor published in the model WHS Regulations of 2025, air-supplied equipment for each worker inside; flammable gas below the limits; a standby person; and practised rescue. This line is not the permit. **Law, rr 66 to 74, page 16; in Victoria, rr 63 to 68, page 17** **Good practice** the separate tests		
☐	A worker alone or after hours has a way to call for help that works there; someone watches the check-ins, and a missed one is escalated. **Law, r 48, page 21 (the system of work)** **Good practice** who watches, and the escalation		
☐	Before restart: the handback checklist done; each lock removed by its owner under the approved procedure, or kept on for a named defect and owner; guards back; in a food area, the area accepted by the quality lead; and the restart authorised by the designated person. **Law, r 208(5), page 13 (the guards)** **Good practice (the handback)**		

11 TEMPLATE

The plant contractor map.

One row per contractor, at every tier, in two linked views: who and where, then what they hold and who releases the work. The first row of each is an illustration; its names, numbers, and dates are examples, not live actions.

View 1: who, where, and who answers for it.

Contractor and tier	Engaged by, and contract	State	Work, area, and plant	Accountable roles	Review date
Illustration: a refrigeration contractor, tier 1	*The plant, contract 27, from 06/03/2027*	*Victoria*	*Cool room and blast freezer evaporators; Saturday and Sunday*	*Plant: the maintenance supervisor. Contractor: its supervisor*	*01/04/2027*

View 2: what they hold, and who releases the work.

Contractor	Isolations and permits	Licences and competence	Workers consulted	Food-area rules	Notifying	Release by
Illustration: the refrigeration contractor	*Isolations by the plant's electrician; the contractor's own locks; permit 5119*	*2 technicians, licences for the HFC valve work sighted; trading authorisation on file*	*Crew and the plant's health and safety representative briefed; views recorded*	*Inducted; gowned and washed; tools cleaned in*	*Leading hand tells the shift manager at once; the operations manager notifies, and the contractor confirms its own duty is met*	*Plant engineer, with the contractor's lead*

How to keep the map true.

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

Start it at the contract.
A row is opened when the contract is signed, not when the crew turns up, and each contractor tells you before it engages a tier below it, labour hire included.

Review it on any change.
A new tier, a changed area, a lapsed licence, a new chemical, or an incident changes the row. Fill in each row's review date, and keep the plant's incident card (page 25) with it.

Keep it where the gate can see it.
The map is only useful if the gate, the maintenance office, and the shift supervisor can all see it when a crew arrives, on day shift and night shift.

12 ONE STANDARD AT EVERY GATE

The same standard at every gate.

Every check in this guide has to work on the first morning of the Christmas shutdown, and at 2 am on a Tuesday breakdown.

Questions to ask about how you manage it today.

1. If an inspector asked who was on the floor last Saturday during the maintenance window, and what each held, how long would the answer take?
2. For each isolation in your last shutdown, can you show whose lock went on, who verified the isolation, and who took the lock off?
3. Who checks a forklift driver's licence, and a refrigeration technician's refrigerant handling licence, before they start?
4. Do contractors who bring chemicals give you the safety data sheets before they arrive?
5. Who decides whether a tank, silo, or pit is a confined space, and is that decision written down?
6. Do your food-area rules reach the trades and pest controllers as well as your own staff?
7. Have you agreed with every contractor who notifies, and who tells whom, and is it on each plant's card?
8. How many hours a week do your maintenance and HSE teams spend chasing contractor paperwork?

What to look for in a system.

Seven capabilities that keep these checks working at every gate. A system holds the evidence and runs the checks; a person still decides who suits the task, checks they understood, and authorises the work. Keep a paper fallback for the gate and roll call.

- **One record for every worker.** Direct-hire workers and contractors on the same record, induction, licence, and verification of competency alike.
- **Licences checked before the shift.** Forklift, elevating work platform, and electrical licences checked at sign-in before the shift starts, so a lapsed one is caught at the gate; your site rules decide which work it stops.
- **Isolations tied to the worker.** A lockout and tagout permit raised on a phone, naming the isolation point and the worker who holds it.
- **Permits with the method behind them.** Isolation, confined space, and hot work permits; AI reads the safe work method statement against your standard before a person approves it; and confined space entry and exit times logged.
- **Shutdown crews ready before the gate opens.** Inductions on the worker's own phone before arrival; the site briefing still happens on the day. AI flags a ticket that lapses inside the shutdown window before booking.
- **Food areas on the record.** Site-specific induction content for a production area, contractor access checked against hygiene requirements, and a record of who entered.
- **A live list at the gate, and a record for the regulator.** A QR code or kiosk at the gate: not cleared, not in; a live list for the evacuation and the roll call; and an audit export of every induction, permit, isolation, and sign-in.

START SMALL

Start with one plant, or one shutdown.

Take one plant, fill in its contractor map on page 33, and run the checklist on pages 30 to 32 against its contractors. Close the gaps first: isolations owned and verified, licences sighted, food-area rules in the induction. Then ask anyone offering a system to show each point above on your own plant.

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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) and Safe Work Australia's model codes of practice, Victoria's OHS Act and Regulations, the Commonwealth's refrigerant handling rules, and Food Standards Code Standards 3.1.1, 3.2.2, 3.2.2A, 3.2.3, and 4.2.4 with Food Standards Australia New Zealand's guidance, as read on the dates above. Each jurisdiction enacts its own WHS law, so text and numbering differ; New South Wales legislation and each state's food Act were not read for this edition. It does not cover workers compensation, electrical licensing, dangerous goods, environment protection, export, or food recall and notification rules. For a decision about your own plants and contractors, read the law that applies to you and take legal advice. It is a contractor management guide, not a technical, machinery safety, or food safety manual.

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