COMPLYFLOW

CONTRACTOR COMPLIANCE GUIDES

Property and Facilities Management: the contractor compliance guide.

What Australian law asks of building owners, managing agents, and FM companies when contractors work on site, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; state sources read 4 and 5 November 2026

Includes
A pre-start checklist, an authorisation record, and a building duty map

Covers
The model WHS states, with Victoria and NSW named

START HERE

The short version.

The cleaner in the tower after hours, the guard on the loading dock, the lift technician in the motor room, and the electrician on the roof all work in buildings you own or manage. For WHS purposes, a contractor who carries out work for your business is one of your workers; Victoria gets there by its own route (page 11). The duty you owe them cannot be handed to the FM company, the managing agent, or the contractor in a clause.

1 **Contractors are workers, for WHS purposes.** Under the model WHS Act, a person who carries out work for a business as a contractor or subcontractor, or as a contractor's employee, is a worker of that business.[2]

2 **Managing or controlling a building brings its own duty.** The building, the ways in and out, and anything arising from it must be without risks to anyone, so far as is reasonably practicable. An owner, a property manager, an FM company, and a tenant can each hold it, for the part they control.[2, 5, 9]

3 **Several businesses can hold the same duty at once,** and each must, so far as is reasonably practicable, consult, cooperate, and coordinate with the others. None of them can transfer it.[2]

4 **Some checks are law, not good practice.** Sighting a high risk work licence before the work, giving the asbestos register to a business whose work risks exposure, and a safe work method statement before high risk construction work, whatever the job is worth.[3]

5 **Let in is not the same as authorised.** Signing a trade in does not authorise them to isolate a fire system or open a roof. Permits, isolations, the method actually followed, and a formal handback come between the two (page 17).

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01 THE PRACTICAL TEST

The practical test is what you can show.

A facilities team rarely runs one workplace. It runs 20, or 200: office towers, shopping centres, campuses, terminals, and government buildings, each owned by someone else, with tenants whose own trades come and go, and many of them empty after hours. At any one of them, the question that matters is easy to ask and hard to answer: who was on site, and what did they hold on the day?

An approved company is not a ready worker.

Most contractor checks stop at the company. Under the model WHS laws, the duty reaches further. For WHS purposes, a contractor's employees who carry out work for your business are your workers too (section 7(1)),[2] and before any of them does high risk work that needs a licence, the business directing or allowing it must see written evidence of that licence (r 85).[3] A company approved last year says little about whether the electrician on the roof this Saturday is licensed, inducted to this building, and expected there today.

CHECKED ONCE

The company

- ✓ Selected against clear criteria, its safety record included; reviewed on a new scope, an incident, or a lapse
- ✓ Insurance and workers compensation, with expiry dates
- ✓ The contract: who checks, who authorises, who keeps the record

CHECKED AT EVERY DOOR, ON THE DAY

Each worker, at each building

Office tower | Shopping centre | Campus

- ✓ Any high risk work licence sighted before the work (r 85), and any licence the trade needs by law[3]
- ✓ For construction work, general construction induction training, and construction work in the last 2 years if the training is older (r 317)[3]
- ✓ Inducted to this building, signed in, authorised for this task, and supervised to match the work

Where it usually breaks across a portfolio.

The same trade, onboarded again and again.
A contractor who works at 30 of your buildings fills in 30 sets of forms, and each building holds a slightly different copy.

Checked by hand.
Someone opens each certificate and types its expiry date into a spreadsheet. It holds until that person is away, or the list grows.

Different rules at every door.
One building asks for an induction and the asbestos register; the next asks for neither. The standard is whatever the last site manager decided.

No view across the portfolio.
Nobody can say which trades are current across every building, or who signed in at an empty site last Sunday.

Consistent does not mean identical. One standard every contractor must meet, each building's own requirements on top, checked once at company level and again for each worker at each door. 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)).[2] Page 25 ends with questions to ask about how you manage it today.

02 THE DUTY HOLDERS

One building, many duty holders.

Work health and safety law puts its main duty on a "person conducting a business or undertaking", a PCBU. That business "has a primary duty to ensure the health and safety of workers while they are at work in the business or undertaking and others who may be affected by the carrying out of work", so far as is reasonably practicable (section 19).[1, 2]

Contractors are workers.

For WHS purposes, 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)).[2]

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, while the workers are at work in the business (section 19(1)). That can reach a subcontractor's technician you never contracted with.[2]

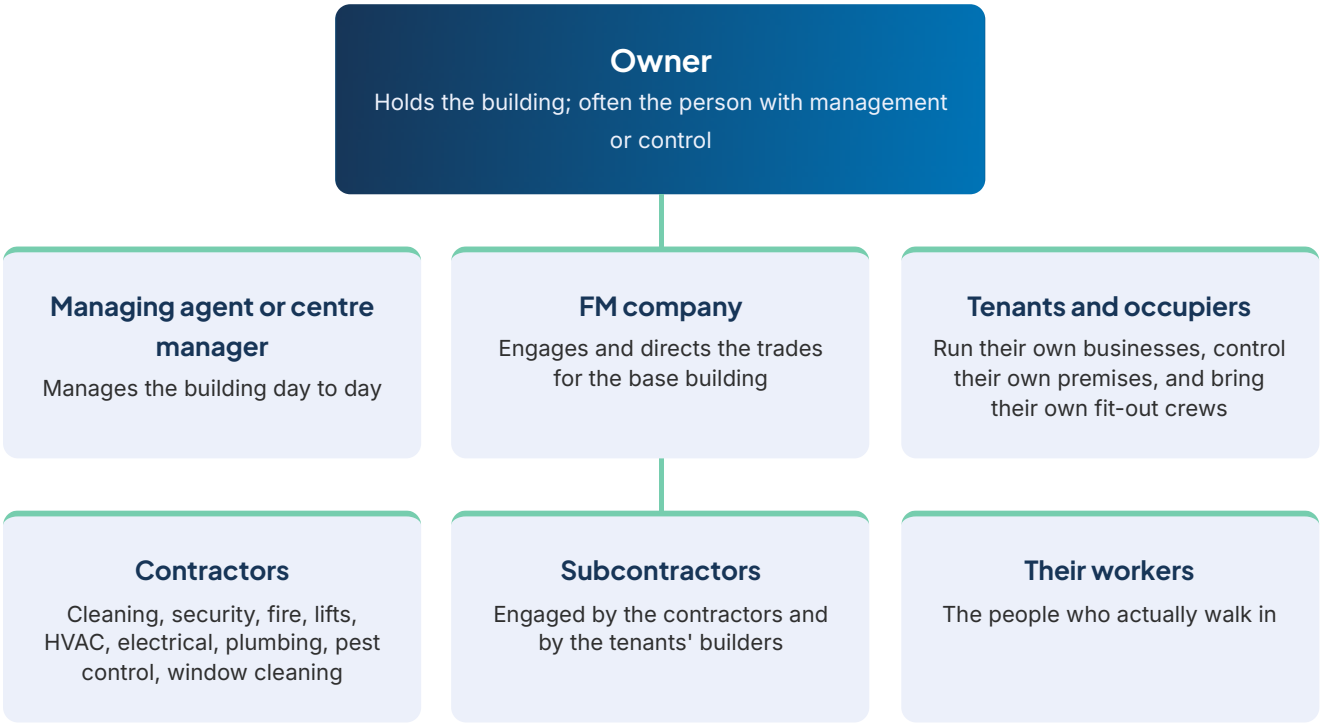
Supervision is part of it.

The duty includes ensuring, so far as is reasonably practicable, the information, training, instruction, or supervision needed to protect everyone from risks arising from the work (section 19(3)(f)).[2]

02 THE DUTY HOLDERS

Who is a PCBU at a shopping centre, a tower, or a campus.

Safe Work Australia's own example of a workplace with many PCBUs is a building like the ones you manage: "The owner of a multi-tenanted shopping centre, the manager of the shopping centre, each of the businesses operating from shops in the shopping centre and those carrying out ancillary activities such as cleaning, security and shopping trolley collection."[4] The same pattern holds in an office tower, a university campus, an airport terminal, or a government building: an owner, a manager, an FM company, tenants or occupiers, and their trades.



Tenant fit-outs bring strangers into your building.

Fitting out, converting, and renovating leased premises is construction work under the model Regulations (r 289(1), page 12).[3] It is a common way trades nobody in the building team engaged end up on your floors and in your risers. Decide before the first fit-out who approves a tenant's trades, whether they must meet the base building's standard, who holds the asbestos register for their area, and who signs them in. Our recommendation: the same sign-in and the same minimum standard for every trade, whoever engaged them, with the tenant's own requirements on top.

One thing the law leaves open. Whether a particular owner conducts a business or undertaking at a building is, in Safe Work Australia's words, "a question of fact to be determined in the circumstances of each case".[1] Its guidance lists control over the place where work is done as one relevant factor, and its shopping centre example names the owner as a PCBU.[4] Our view: an owner that engages contractors, directly or through an agent, should plan on the duty applying.

03 MANAGEMENT OR CONTROL

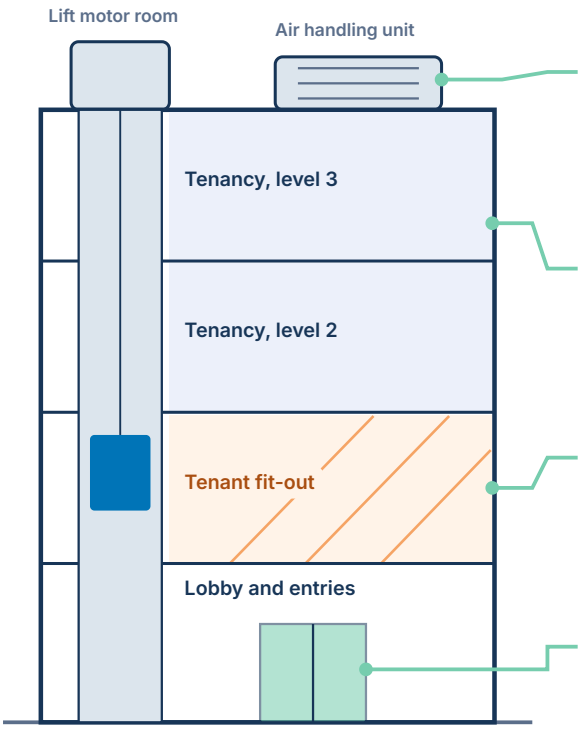
The building carries its own duty.

A person with management or control of a workplace is a PCBU "to the extent that the business or undertaking involves the management or control, in whole or in part, of the workplace" (section 20(1)).[2]

> **"… must ensure, so far as is reasonably practicable, that the workplace, the means of entering and exiting the workplace and anything arising from the workplace are without risks to the health and safety of any person."**
>
> Model WHS Act, section 20(2)[2]

"Reasonably practicable" weighs how likely and how harmful the risk is, what the person knows, or ought reasonably to know, about it and the ways to deal with it, what is available and suitable, and then whether the cost is grossly disproportionate to the risk (section 18).[2]

Who holds it at a managed building.



Lifts, plant rooms, switchboards, building services.

Whoever manages or controls fixtures, fittings, or plant must ensure, so far as is reasonably practicable, that they are without risks to the health and safety of any person (section 21(2)).[2]

A tenancy: the tenant, for what it controls.

WorkSafe Victoria says the person who manages or controls a workplace "can include an employer, the building or site owner and the property management or tenant of a building".[9] For asbestos, it says a person who leases a building and runs a business from it is generally not that person.[10]

A tenant's fit-out: construction work.

Fitting out leased premises is construction work (r 289(1)). Under the model laws, a tenant that commissions one of AU$250,000 or more is the principal contractor by default (page 13); in Victoria, from AU$350,000, the owner is, unless it appoints one and

The building, and the ways in and out.

In Safe Work Australia's lift maintenance example, "the building owner and property manager have duties as persons with management or control of the building to ensure people can safely enter and exit the building and the building is safe and without risk to others", so far as is reasonably practicable.[5]

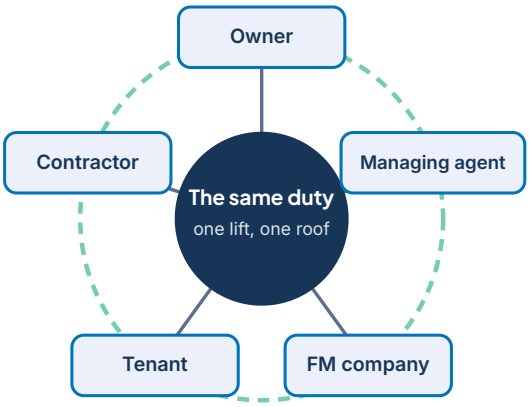
FM companies and agents. In its asbestos guidance, written under Victorian law, WorkSafe Victoria says the person with management or control can be one who "has legally been assigned management or control duties over a workplace".[10] Whether an FM company holds the duty turns on what the contract assigns and what it actually controls. **Residential strata is different:** SafeWork NSW says an owners corporation responsible only for common areas used only for residential purposes is generally not a PCBU for those areas, unless it employs a worker; where common areas mix residential and commercial use, WHS laws usually apply.[28]

What we recommend: write down, for each building, who manages or controls it and for what: the base building, each tenancy, and each fit-out. A contract can set out who does what. It does not split the duty: each business keeps its own, measured by its capacity to influence and control the matter, counting any capacity a contract tries to remove (section 16(3)).[2] Every part needs a name against it.

04 SHARED DUTIES

Shared, but never handed over.

An owner, a managing agent, an FM company, a tenant, and a contractor can all hold a duty about the same lift. The model WHS Act sets four rules for that.



Consult, cooperate, and coordinate

1. **Held at once.** "More than 1 person can concurrently have the same duty" (section 16(1)).[2]
2. **Each to its own control.** Each discharges its duty "to the extent to which the person has the capacity to influence and control the matter or would have had that capacity but for an agreement or arrangement purporting to limit or remove that capacity" (section 16(3)(b)).[2]
3. **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).[2]
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).[2]

What working together looks like in a building.

With tenants and contractors. Safe Work Australia's code says "a landlord or managing agent should consult, cooperate and coordinate activities with commercial tenants, for example about emergency plans and procedures, or with a contractor carrying out maintenance or repair work."[5]

Before the work, not after. In the code's worked example, before lift maintenance "the property manager consults with the maintenance contractor, the tenants and the cleaning contractor so duty holders know of the work and what they each need to do".[5]

With the workers, not only the businesses. Each business must also consult, so far as is reasonably practicable, its workers who are, or are likely to be, directly affected, and their health and safety representatives (sections 47 and 48).[2] A tenant meeting does not discharge it.

Led from the top of the chain. Safe Work Australia says businesses "at the top of the contractual chain can build work health and safety into contractual management and take the lead in coordinating work health and safety practices down the chain."[6]

FOR THE CONTRACT MANAGER

An agreement can organise the work. It cannot carry the duty.

"WHS duties cannot be contracted out to another party, such as a subcontractor," says Safe Work Australia; businesses can agree how duties will be met, "so long as it does not limit or modify their WHS obligations".[6] So the FM contract should say who checks, who authorises, who keeps the record, and who coordinates; every party should still be able to show what it did.

05 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)).[2]

The model Act defines an officer through section 9 of the Corporations Act 2001 (Cth) and, for the Crown and public authorities, as a person who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business or undertaking (sections 4, 247 and 252). Whether someone is an officer turns on the role they play, not their job title.[2] Safe Work Australia describes an officer as someone who "makes, or participates in making, significant decisions that affect the whole, or a substantial part, of the business, or has the capacity to significantly affect the business' financial standing."[1]

Why it matters to an FM company.

An FM company's officers answer for the FM company's duties, and the owner's officers answer for the owner's. A monthly report that both can read, drawn from the same records, is a simple way for each to support the verification step.

Victoria.

This chapter describes the model WHS Act. Victoria's OHS Act 2004 has its own provisions on officers; check them before relying on this chapter for a Victorian entity.

05 OFFICERS

The six things due diligence includes.

Section 27(5) of the model Act says due diligence includes taking reasonable steps to:[2]

1. Acquire and keep up to date knowledge of WHS matters
2. Understand the operations, and their hazards and risks
3. Make sure the business has, and uses, appropriate resources and processes to eliminate or minimise risks
4. Make sure it has appropriate processes to receive and consider information on incidents, hazards, and risks, and to respond in a timely way
5. Make sure it has, and implements, processes for complying with its duties
6. Verify that the resources and processes in steps 3 to 5 are provided and used

The last step is the one a contractor policy cannot satisfy on its own. A policy says what should happen before a trade starts. Verifying means checking that it did: at which building, against which requirements, on which day, and whether the work was authorised and handed back.

What a policy says.

- Contractors must be prequalified before engagement.
- High risk work licences are sighted before the work.
- Fire isolations are approved in advance.
- Every job is handed back before the area reopens.

What verifying shows.

- Which contractors worked last month without a current prequalification.
- Whose licence was sighted, by whom, and before which job.
- Which isolations ran longer than approved, and at which building.
- Which jobs closed without a signed handback.

WHAT A BOARD CAN ASK FOR

- Contractors engaged this quarter, and how many were checked before their first visit.
- Documents due to lapse in the next 30 days, by building.
- Buildings with no current asbestos register, or one not reviewed.
- Fire system isolations this quarter, and how long each lasted.
- Jobs handed back without a sign-off, by building.
- Incidents and near misses involving contractors, and what changed.

06 STATE BY STATE

One model, with Victoria apart.

Western Australia's Work Health and Safety Act 2020 received assent on 10 November 2020[21] and became operational on 31 March 2022,[7] and Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws."[7] Each jurisdiction enacts its own version, and the differences go beyond numbering.

Safe Work Australia notes that "in some instances, states and territories have also made more substantial variations".[7] For a portfolio, that means a figure, a date, or a trigger that is right in one state can be wrong in the next: the cost that makes a construction project, the build date that exempts a building from an asbestos register, and how incidents are notified (page 20). The figures below and the table overleaf name the ones a property team trips over most.

AU$250,000

Construction project, model laws and NSW.

A construction project is one where the cost of the construction work is AU$250,000 or more (model r 292). SafeWork NSW puts the NSW figure at AU$250,000 too. Victoria sets no cost; its principal contractor rules apply from AU$350,000 (r 332(1)).[3, 30, 20]

AU$350,000

Victoria.

The owner is the principal contractor unless it appoints one and authorises it to manage or control the workplace and authorises it to manage or control the workplace (Victorian Regulations, r 332 and r 333).[20]

AU$450,000

South Australia.

SafeWork SA puts its construction project threshold at AU$450,000.[22]

06 STATE BY STATE

Where	The law	What it means for a portfolio
New South Wales	Work Health and Safety Act 2011 (NSW) and Work Health and Safety Regulation 2025 (NSW).[15] The Regulation numbers its provisions as sections; check each number against it before quoting one.[16]	Two NSW rules sit outside WHS law: fire safety measures tested to AS 1851-2012 (page 16), and the workers compensation statement a principal contractor gets from each subcontractor (page 21).
Victoria	Occupational Health and Safety Act 2004 (Vic) and the Occupational Health and Safety Regulations 2017 (Vic).[11, 20] 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).[11] Whoever has, to any extent, the management or control of a workplace, "whether as an owner or otherwise", must ensure so far as is reasonably practicable that the workplace and the means of entering and leaving it are safe and without risks to health, but only for matters it manages or controls (s 26).[11]	WorkSafe Victoria says the person who manages or controls a workplace can include an employer, the building or site owner, and the property management or tenant of a building.[9] Hold a Victorian building to the same discipline as the rest of the portfolio, checked against Victoria's own Act and Regulations.
Every other state and territory	Each jurisdiction's own version of the model WHS Act and Regulations.[7]	The regulators publish their own guidance on contractors: WorkSafe Queensland on principal contractors,[14] SafeWork SA on contractor management,[13] and WorkSafe Tasmania on contractor management.[12] Check the local law, not only its numbering.

Queensland: an older asbestos date.

	Built on or before 31 December 1989	Built 1990 to 2003	Built after 31 December 2003
Model laws r 425[3]	Register needed	Register needed	No register if no asbestos is identified and none is likely
Queensland Queensland Government[23]	Register needed	No register if no asbestos is identified and none is likely	No register if no asbestos is identified and none is likely

The ringed pair is the trap: a policy written to Queensland's date leaves 1990s buildings elsewhere under the model laws without the register the model date requires. Queensland's guidance also says that before demolition, refurbishment, maintenance, or service work on a building constructed before 31 December 1989, the register must be reviewed, revised if it is not adequate, and a copy given to whoever does the work before it starts.[23]

07 CONSTRUCTION WORK

When maintenance becomes construction work.

Property teams rarely think of themselves as running construction work. The model WHS Regulations take a wider view, and the rules that follow from it are some of the most specific in the law.

Is it construction work?

Work in connection with the construction, alteration, conversion, fitting-out, commissioning, renovation, repair, maintenance, refurbishment, demolition, decommissioning, or dismantling of a structure (r 289(1)), including installing, testing, or maintaining an essential service: gas, water, sewerage, telecommunications, electricity, and similar services, or chemicals, fuel, or refrigerant in pipes or lines (r 289(2)(e), r 5(1)). [3]

No →

Not construction work.

Nor is testing, maintenance, or repair of a minor nature (r 289(3)(d)). Routine servicing of an air conditioning unit can be minor work. [3]

Yes ↓

Is it high risk construction work?

For example, a risk of a person falling more than 2 metres; work on or near energised electrical installations or services, or chemical, fuel, or refrigerant lines; work where powered mobile plant moves; work likely to disturb asbestos (r 291). [3]

Yes →

A SWMS first, whatever the job is worth.

Prepared before the work starts (r 299(1)), and the work done to it; if it is not, the work stops, immediately or as soon as it is safe to, and resumes only to the statement (r 300). [3]

And ↓

Is it a construction project?

Construction work costing AU$250,000 or more under the model laws (r 292), or AU$450,000 in South Australia. In Victoria, any construction project, but the principal contractor rules apply only from AU$350,000 (page 10). [3, 22, 20]

Yes →

A principal contractor.

Under the model laws, the business that commissions it, by default (page 13); in Victoria, the owner, unless it appoints one and authorises it to manage or control the workplace (page 10). [3, 20]

On every construction job

No worker starts construction work without general construction induction training, and construction work in the last 2 years if that training is older; the card, or a certification issued in the last 60 days while it is pending, is held (r 317). Any high risk work licence is seen in writing before the work (r 85). [3]

In our reading, replacing a rooftop unit with a crane, with roof access and the supply isolated, is likely to be construction work. Falls below 2 metres are still managed: any fall from one level to another that is reasonably likely to cause injury (r 78(1)). **Dogging** is slinging that calls for judgement about the lifting gear and method, or directing the crane operator when the load is out of view (r 5(1)); our recommendation is a licensed dogger named for any crane lift at your building. [3]

07 CONSTRUCTION WORK

Commission a refurbishment, and you may be the principal contractor.

Under the model laws, a business that commissions a construction project is the principal contractor for it, unless it engages another business and authorises it to have management or control of the workplace and to discharge the principal contractor's duties. A project has only one principal contractor at a time (r 293).[3] So an owner or an FM company that commissions a AU$250,000 refurbishment of a floor is the principal contractor by default. In Victoria, the owner is the principal contractor for a project of AU$350,000 or more unless it appoints one and authorises it to manage or control the workplace (page 10).[20]

What the principal contractor must do.

Rule	The duty
R 308 Signs	Install signs, clearly visible from outside the workplace, showing the principal contractor's name and telephone contact numbers, an after hours telephone number included, and where its site office is, if there is one.[3]
R 309, R 310 WHS management plan	Prepare a written WHS management plan for the workplace before work on the project starts, and ensure, so far as is reasonably practicable, that each person who is to carry out construction work is made aware, before starting, of its content and of their right to inspect it.[3]
R 312, R 301 SWMS	Take all reasonable steps to obtain a copy of the SWMS for any high risk construction work before that work starts; the business doing the work must give it one (r 301).[3]

Three more rules that reach the building owner.

Rule	What it requires
R 296 **Hazard information**	Where it engages a principal contractor, the commissioning business must give it "any information the person has in relation to hazards and risks at or in the vicinity of the workplace".[3]
R 294 **Consulting the designer**	A business that commissions construction work on a structure must, so far as is reasonably practicable, consult the designer of the structure. This applies to any construction work on a structure, not only to construction projects (page 10). It is a model provision; Victoria's Regulations are not covered by this row.[3]

A tenant's fit-out.

Under the model laws, a tenant that commissions a fit-out costing AU$250,000 or more is the principal contractor for it, unless it engages a builder as principal contractor and authorises it to have management or control of the workplace and to discharge the principal contractor's duties (r 293). In Victoria (AU$350,000 or more), the owner is the principal contractor unless it appoints one and authorises it to manage or control the workplace (page 10).[3, 20]

Below the threshold.

WorkSafe Queensland puts it plainly: a business "can authorise a contractor to have management or control of a construction workplace, but cannot transfer any duty in relation to management or control under the Act."[14]

08 ASBESTOS

The register, and who has to see it.

For most older buildings, the asbestos register is the single document a contractor most needs before starting. The model WHS Regulations put its keeping squarely on the person with management or control of the workplace.

1 Identify.

Asbestos at the workplace identified by a competent person, so far as is reasonably practicable.

R 422

2 Record.

A register kept at the workplace, up to date. Under the model laws, none needed for a building constructed after 31 December 2003 (in Queensland, after 31 December 1989) if none is identified or likely (page 11).

R 425

3 Share.

Readily accessible to workers and businesses that have worked, work, or will work there, those workers' health and safety representatives, and businesses that have had, have, or will have work done there; a copy given to a business whose work risks exposure to airborne asbestos.

R 427

4 Plan.

A written asbestos management plan, where asbestos is identified or likely to be present.

R 429

Keep it current The register is reviewed when the asbestos management plan is, at least once every 5 years, and whenever asbestos is found, removed, disturbed, sealed, or enclosed (r 426, r 430(1)(e)). In Victoria, at least every 5 years (r 228). [3, 20]

Two moments the register must move.

Before demolition or refurbishment.

For a structure or plant constructed or installed before 31 December 2003, the register is reviewed, revised where it is inadequate for the work (for example, made without access to an area the work will open up), and a copy given to the business doing the work (r 448, r 449). Minor or routine maintenance is not demolition or refurbishment (r 447). [3]

When management or control changes hands.

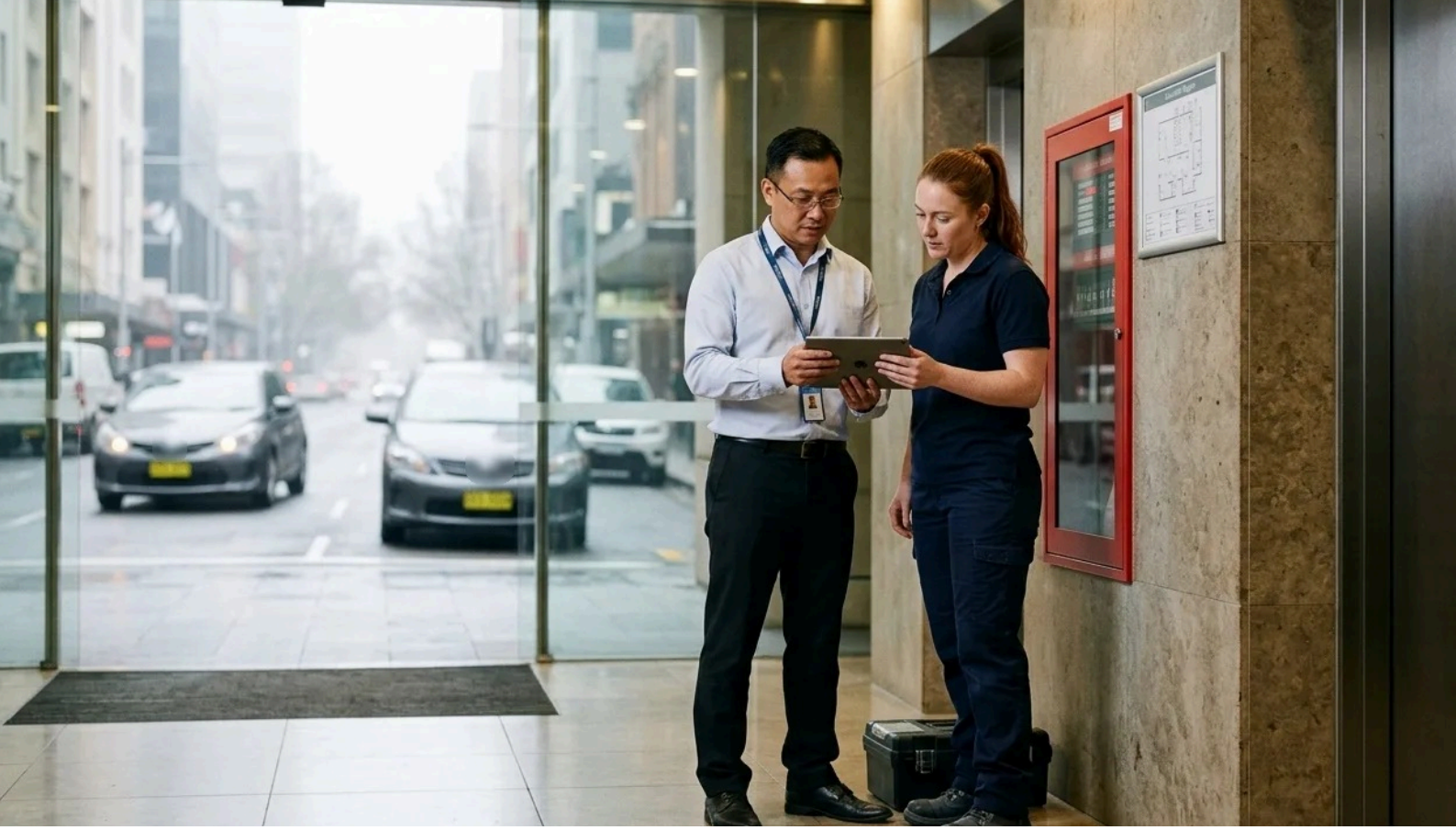
The register is given, so far as is reasonably practicable, to the person, if any, assuming management or control of the workplace (r 428). That is the moment an FM contract moves to a new provider, where management or control passes with it. [3]

A register has limits.

It records what the surveyor could see. Our recommendation: before work that cuts, drills, or opens a ceiling, wall, or riser, confirm the register covers that area; treat inaccessible areas as unknown; stop if suspect material appears.

In Victoria.

Whoever manages or controls a workplace "must record in an asbestos register ... the results of an identification of asbestos" (Victorian Regulations, r 227(1)). [20] WorkSafe Victoria says the register must be accessible to all employees and contractors who may encounter asbestos, and handed to whoever does demolition or refurbishment. [10, 19]



09 FIRE SAFETY, ESSENTIAL SERVICES, AND REGISTERED PLANT

Contractor work can switch off a building's protection.

An electrician isolates a zone so the dust will not set off the detectors. A plumber shuts a sprinkler valve. A fit-out crew cuts a hole through a fire-rated wall for new cabling. Each is routine, and each leaves the building less protected until someone puts it back. The people who must restore it are often the ones who left first.

Isolations.
Detection, alarms, sprinklers, and smoke control taken offline for work, then reinstated and tested.

Penetrations.
Holes made through fire-rated walls, floors, and shafts for services, and sealed again to the right standard.

Exits.
Paths of travel, fire doors, and stairs blocked by materials, plant, or a crane set-up.

Four controls for any work near a fire system.

1 Approved before.
By a named person, for a stated time, with the monitoring company and the building told.

2 Covered during.
A fire watch, or another agreed measure, while the protection is off; kept as short as the work allows.

3 Restored after.
Isolations removed, the system reinstated and tested, penetrations sealed, and exits clear, before the trade leaves.

4 Recorded.
Who approved it, time out, time reinstated, and who tested it, kept with the fire safety records.

09 FIRE SAFETY, ESSENTIAL SERVICES, AND REGISTERED PLANT

What	The rule	What it means for the trades
NSW fire safety measures	From 13 February 2026, the essential fire safety measures in class 1b and class 2 to 9 buildings must be inspected and tested to AS 1851-2012 where the standard covers the measure, and the owner gives an annual fire safety statement.[26]	The fire services contractor works to the standard, and the owner keeps the record that it did. LAW STANDARD
Victoria essential safety measures	The owner of a building with essential safety measures must prepare an annual essential safety measures report, and may authorise an agent, such as a maintenance contractor, to complete it.[27]	Every contractor who services a measure, or works near one, feeds that report. LAW
Registered plant	Lifts, escalators and moving walkways included, building maintenance units, the cradles that carry window cleaners down a tower, and mobile cranes rated over 10 tonnes are items of plant that must be registered (model r 246 and Schedule 5). Nobody may carry out work using plant that must be registered unless it is (Act s 42).[2, 3]	Lift technicians and window cleaners work on or from registered plant. Hold the registration, and check it is current before the cradle goes over the edge. LAW
An emergency plan	A business must ensure an emergency plan is prepared for the workplace, including evacuation procedures, and maintained so it stays effective (model r 43).[3]	A trade that disables a system or blocks an exit changes how that plan works. The plan, and the people running it, need to know.

What to ask each specialist trade for.

Fire services.
The service records for each measure, the isolation log, and the open defects list, every visit.

Lifts and escalators.
The plant registration and its expiry, the maintenance log, and who answers a trapped-passenger call after hours.

Window cleaning at height.
The building maintenance unit's registration, its last inspection, and the method for the drop, before the cradle is used.

Good practice, not a single rule. These lists and the four controls on page 15 are our recommendation, drawn from the duties to manage risk so far as is reasonably practicable and to keep the emergency plan effective. A building's own fire safety contractor and its fire safety engineer set the detail for that building.

10 AUTHORISING AND CONTROLLING THE WORK

Let in is not the same as authorised.

Signing in lets a contractor into the building. It does not authorise them to open a ceiling, isolate a fire system, or go onto the roof.

Control	What it means in a managed building	Status and source
Task risk assessment	The job, the area, and the tenants and public nearby assessed before work starts, and the controls agreed, not left to the trade on arrival.	LAW eliminate or minimise risks so far as is reasonably practicable (model Act ss 17 and 19; Regulations Part 3.1 where a regulation applies it) [2, 3] GOOD PRACTICE the written assessment
Permits and isolations	Work in a confined space needs a written permit and the page 18 controls. Hot work, roof access, and isolating power, water, gas, or a fire system are run as the building's own permits, each with a named person who issues and closes it.	LAW the risks managed, so far as is reasonably practicable, model Act ss 17 and 19; confined space entry permit, r 67 [2, 3] GOOD PRACTICE the permit form
A SWMS, where the law asks for one	Required before high risk construction work, not before every job (page 12). Once there is one, the work must follow it: if it does not, the work is stopped immediately, or as soon as it is safe to stop.	LAW r 299 and r 300 [3]
Roof and heights	Roof access controlled, edges and fragile roofing protected, and any fall that is reasonably likely to cause injury managed, whatever the height.	LAW r 78 [3] GOOD PRACTICE the roof access permit
Fire system isolation	Approved in advance, kept short, covered, reinstated and tested before the trade leaves (page 15).	LAW an emergency plan for the workplace, r 43 [3] GOOD PRACTICE the isolation steps
Work-area protection	Barriers and signs; tenants, shoppers, and the public kept clear; tools and materials secured; exits and fire doors kept free.	LAW others not put at risk, so far as is reasonably practicable, s 19(2); a construction workplace secured from unauthorised access, so far as is reasonably practicable, r 298 [2, 3] GOOD PRACTICE the measures listed
Handback	The area inspected, services reinstated and tested, isolations removed, penetrations sealed, the tenant or the building manager told, and the permit closed, before the area reopens.	LAW the building and the ways in and out without risks, so far as is reasonably practicable, s 20(2) [2] GOOD PRACTICE the signed handback

One job, five steps.

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

2 Assessed.
Risks, permits, isolations, any SWMS, the fire and asbestos checks.

3 Authorised.
By whoever controls the area; affected tenants told.

4 Handed back.
Checked, reinstated, signed off, record closed, then reopened.

5 Controlled Throughout: a named person is responsible for the work while it runs, and checks it against what was authorised.

10 AUTHORISING AND CONTROLLING THE WORK

What one authorisation records.

	Field	Filled in by
☐	The job, the area, the date and hours, and the contractor and each worker	Requester
☐	Licences and induction checked for each worker, for this building (page 21)	Contractor coordinator
☐	The risk assessment, and any SWMS, permit, or isolation, by number	Contractor and permit issuer
☐	The asbestos register checked for this exact area, and a copy given if the work risks exposure	Building manager
☐	Any fire isolation: approved by, time out, time reinstated and tested	Fire services contractor and building manager
☐	Tenants and other contractors affected: who was told, and what they agreed	Building manager
☐	Handback: area checked, services reinstated, penetrations sealed, signed off, permit closed	Building manager

Anyone can stop the work.

Make it a contract term and a line in the induction: anyone who sees work running outside what was authorised can stop it, and the person who authorised it decides what happens next. For high risk construction work not done to its SWMS, stopping is the law.[3]

When the job changes.

A bigger job than the one authorised is a new job: assess it again and re-authorise it. Asbestos is the common case: if suspect material appears where the register did not expect it, the work stops. A routine service that turns into a unit replacement may now be construction work (page 12).

Confined spaces: the permit does not replace the controls. An enclosed or partially enclosed space, not designed or intended mainly for people, at normal atmospheric pressure, with an actual or likely atmosphere, contaminant, or engulfment risk (r 5): a riser or duct only if those apply. Always a competent person's written risk assessment; avoid entry if you can; to enter, a standby in contact, the atmosphere and connected plant controlled, and practised rescue.[3]
LAW rr 66, 67, 69 to 71, 74

How long, and who sees it. Keep records for the longest legal minimum (licence evidence 1 year after the work, r 85(4); notifiable incidents 5 years, s 38(7)) and any incident or claim hold.[2, 3] The Privacy Act's employee records exemption covers your own employees, not a contractor's.[31]

11 A WORKED EXAMPLE

A Saturday on the roof.

A suburban shopping centre in north-west Sydney, built in the early 1990s, is managed by an FM company for a property fund. A rooftop air handling unit has failed, and the mechanical contractor will replace it on Saturday morning, with a mobile crane in the service yard and its own electrician on the supply.

Seven things are live, each with a name against it. The regulation numbers below are the model's; the NSW Regulation numbers its provisions as sections, so check each number against it before quoting one. [16]

What is live	Why	What gets checked and kept
The contractor's documents	The technician who recovers the refrigerant needs the national refrigerant handling licence, [25] and the electrician the trade licence the state requires. [24]	Company prequalification current; insurance and workers compensation current; both trade licences on file
The crane	If the crane is a slewing mobile crane, its operator needs the high risk work licence for its capacity class (a non-slewing mobile crane over 3 tonnes needs one too), and anyone doing dogging work, that is, slinging the load with judgement about the lifting gear and method, or directing the operator when the load is out of view, needs a dogging licence (r 5(1), Schedule 3). [3]	Both licences sighted before the lift, with expiry dates; the crane's set-up area kept clear of the public
The method	If replacing the unit is construction work, as it is likely to be (r 289), then work at a fall risk of more than 2 metres, on or near energised electrical installations, on or near refrigerant lines, and with powered mobile plant moving is high risk construction work (r 291), so a SWMS is needed whatever the job is worth (r 299), and the work must follow it (r 300). [3]	The SWMS received and read before Saturday; on the roof, the supervisor checks the work against it
The lift and the roof	Any fall reasonably likely to cause injury must be managed, at any height (r 78). [3] Our recommendation: the supply isolated and locked before disconnection, the roof edge and fragile roofing protected, the lift zone closed.	Roof access permit and electrical isolation, by number; the yard closed until noon
The asbestos register	A building from the early 1990s is covered by the register rules (r 425). If the work risks exposure to airborne asbestos, the contractor must be given a copy (r 427); if it is refurbishment of plant installed before 31 December 2003, the register is reviewed first (r 448, r 449). [3]	The register for the roof and plant room given, with the date, after confirming it covers the roof penetrations
The tenants	A landlord or managing agent should consult, cooperate, and coordinate with tenants and with a contractor doing maintenance or repair work. [5]	Tenants told the service yard is closed until noon; a note of who agreed what
Handback	The unit commissioned, the supply reconnected and tested, any fire or smoke control link restored, penetrations sealed, the yard reopened.	Handback signed by the building manager; permits closed

On paper.

The centre manager is off. The dogger's licence is "in the truck". The SWMS went to an inbox nobody checks at weekends. The asbestos register is in the locked centre office, and nobody signs the area back.

With the checks joined up.

The company and its workers were checked for this centre at engagement. On Saturday each worker signs in on their phone against the authorised job; where the centre is set up that way, anyone not cleared is stopped. The register and the SWMS are on the job, and the handback is signed before noon.

12 WHEN SOMETHING GOES WRONG

One event, several reports.

A technician falls from a ladder in a riser, a guard is assaulted on the loading dock, a cleaner is hurt alone in an empty tower at night: one event can start more than one report, each with its own clock and its own owner. Settle the routes before the night it happens.

One event.
Several routes, each on its own clock, with its own owner.

WHS notifiable incident

A death, a serious injury or illness, or a dangerous incident arising out of the conduct of the business, a contractor's included.

LAW model Act ss 35 to 39 [2]

Immediately
Tell the regulator after becoming aware. Preserve the site, so far as is reasonably practicable, until an inspector arrives or directs otherwise (where the 2025 model change is adopted, releases it); helping the injured and making it safe are still allowed.

Violent incident, where adopted

An assault, a deprivation of liberty, or a threat of either that the person making it is reasonably believed to intend and be able to carry out, that exposes a person to a serious risk of psychological harm.

LAW model amendment, s 37A [29]

As a notifiable incident
Only in a state or territory that adopts the 2025 model change.

Other 2025 additions, where adopted

A worker's absence of 15 or more consecutive days, or expected on a medical practitioner's opinion, after a work-related injury or illness (s 35A); a suicide or attempted suicide with a link to the work or the workplace, as section 35B defines it.

LAW model amendment [29]

14 days, or immediately
In the model, an extended absence within 14 days of becoming aware and a suicide immediately (s 38(1)); each state sets its own once it adopts them.

Between the businesses

The contractor's employer, the FM company, the owner, and any tenant affected. Where the 2025 model change is adopted, the business that must notify the regulator and the person with management or control of the workplace must each ensure, so far as is reasonably practicable, that the other is told immediately (s 39A). Agree a lead notifier if you like; each business still meets its own duty.

LAW where adopted, s 39A [29] GOOD PRACTICE elsewhere

Immediately
Where adopted; elsewhere as soon as you can. Never held to the end of the shift.

Alone in an empty building.

A contract cleaner works the 30th floor at 11pm; the guard is in the lobby. Under the model WHS laws, that needs a system of work with effective communication (r 48). [3] Decide who watches the check-ins, what a missed one triggers, what happens with no signal, and who the guard calls first.

Who decides, at 2am.

- A named on-call manager for the building, who can stop work, call the emergency services, and decide who notifies the regulator.
- Name in the contract who reports what, so nothing falls between two businesses.

13 THE RECORD

What to hold for every contractor.

LAW an Act or Regulations, the model WHS laws or a state's own

REGULATOR STANDARD guidance from Safe Work Australia or a state regulator, or an Australian Standard

GOOD PRACTICE not itself a legal requirement

Level	What to hold	Status and source
The company	Selection criteria and the evidence asked for: safety records, incidents, notices, and prosecutions	REGULATOR WorkSafe Tasmania [12]
	Insurance and its limits, settled before the work starts	GOOD PRACTICE no duty to check it in WHS law
	Workers compensation current. In NSW, SafeWork NSW says a principal contractor needs to make sure its subcontractors sign a statement declaring no outstanding liabilities and that all workers compensation premiums for the work have been paid	REGULATOR SafeWork NSW [17]
	The contract: WHS roles, who authorises the work, action on non-compliance, incident reporting, inductions, and telling you when they are on site	REGULATOR WorkSafe Tasmania [12] GOOD PRACTICE who authorises the work
The worker	Written evidence of any high risk work licence, sighted before the work and kept for at least 1 year after it; class and current status checked, and reviewed if it is suspended, cancelled, or its conditions change	LAW licence evidence seen before the work and kept, r 85(1) and (4) [3] GOOD PRACTICE the status checks and review
	Licences the trade needs by law: in NSW, an electrical licence or certificate for any electrical wiring work, whatever it costs and whether residential, commercial, or industrial; anywhere, a Refrigerant Handling Licence for anything done with a regulated refrigerant that could cause leakage, including installing, servicing, or decommissioning refrigeration and air conditioning equipment	LAW NSW Home Building Act 1989 (NSW Government, Electrical work); [24] LAW national Refrigerant Handling Licence [25]
	For construction work, general construction induction training, with the 2 year rule, or a certification issued in the last 60 days while the card is pending (page 12)	LAW r 317 [3]
	Qualifications, competency evidence, and certificates for the work	REGULATOR WorkSafe Tasmania [12]
The site	An induction before they start, so they know the building's safety expectations, its emergency plan, and who can stop the work	REGULATOR WorkSafe Tasmania, the induction [12] GOOD PRACTICE the emergency plan and who can stop the work
	The asbestos register accessible, a copy given where the work risks exposure, and confirmed to cover the work area	LAW r 427 [3] GOOD PRACTICE the coverage check
	The SWMS for any high risk construction work, before it starts, and the work checked against it	LAW page 12 for the business doing the work; page 13 if you are principal contractor [3]
	Each job's authorisation: risk assessment, permits and isolations, any SWMS, the fire and asbestos checks, and the handback (page 17)	LAW where they apply, page 17 [3] GOOD PRACTICE the written assessment, permits, and handback
	Fire safety measures serviced to the standard, and lift and building maintenance unit registrations current (page 16)	LAW NSW; registered plant [26, 3] STANDARD AS 1851-2012
The visit	Who is on site and who is not: sign in and sign out, by building and by floor	GOOD PRACTICE
	Supervision proportionate to the work, higher for new contractors, high risk work, and complex work	LAW s 19(3)(f), so far as is reasonably practicable; levels from WorkSafe Tasmania [2, 12]
	A record of consultation with the other duty holders, and with the workers affected and their health and safety representatives	LAW consultation, so far as is reasonably practicable, ss 46 to 48; [2] REGULATOR the record between duty holders: Safe Work Australia calls it good practice [6]

13 CHECKLIST

Before a contractor starts.

	Check	Owner	Date checked
	Know who holds the duty		
☐	We know who manages or controls this building, each tenancy, and each fit-out, and for what. **Good practice** the building duty map, page 24		
☐	The FM contract says who checks contractors, who authorises the work, who keeps the record, who coordinates, and who reports incidents. **Good practice** the clauses, and who holds the record		
☐	A tenant's fit-out trades are checked against this building's standard before they arrive. **Good practice** the approval, per fit-out		
	Before engagement		
☐	The company was assessed against clear selection criteria, including its safety record, and is reviewed again on a change of scope, an incident, or a lapsed licence or policy. **Regulator, the selection criteria** **Good practice, the review triggers** the prequalification, dated		
☐	Insurance and workers compensation are current: scope and status checked, not only expiry, and a renewal does not re-approve on its own; in NSW, the subcontractor's workers compensation statement is held. **Good practice; NSW statement: Regulator SafeWork NSW, page 21** certificates, statement, expiry dates		
☐	Each worker's licences for the work are on file, with class and current status checked: any the trade needs by law, any high risk work licence, and qualifications and certificates. **Law, page 21** **Regulator** documents against each worker		
	Before the first visit to this building		
☐	Each worker's induction to this building covered its rules and hazards, its emergency plan, and who can stop the work. **Regulator, the induction** **Good practice, the emergency plan and who can stop the work** induction completion, per worker		
☐	For construction work, each worker holds a general construction induction training card, with construction work in the last 2 years if the training is older, or a certification issued in the last 60 days. **Law, page 12** card number, per worker		
☐	Tenants, other contractors, and the workers affected, with their health and safety representatives, have been consulted. **Law, ss 46 to 48, so far as is reasonably practicable** a note of who agreed what		
	Before the work starts		
☐	The job has a risk assessment, and any permit, isolation, or SWMS it needs. **Law, where they apply, page 17** numbers on the authorisation, page 18		
☐	The asbestos register covers the area being worked on, and a copy was given if the work risks exposure. **Law, page 14, the copy** **Good practice, the coverage check** register version and date given		
☐	Any fire system isolation was approved, covered, and timed. **Good practice** time out, time reinstated		
☐	If we are principal contractor: signs up, WHS management plan written and shared, and SWMS obtained. **Law, page 13** the plan, and the SWMS on file		

13 CHECKLIST

	Check	Owner	Date checked
On the day			
☐	Any high risk work licence was sighted before the work, not after. **Law, page 12** licence number, class, current status, expiry		
☐	Every worker signed in and out, including after hours at an unattended building. **Good practice** sign-in records by building		
☐	High risk construction work was checked on site against its SWMS. **Law, page 12** who checked, and when		
☐	Supervision matched the work: higher for new contractors and high risk work. **Law, s 19(3)(f), so far as is reasonably practicable** who supervised, and how		
☐	The area was handed back: checked, services and fire systems reinstated, signed off, permit closed. **Good practice** the handback, signed		
If something goes wrong			
☐	The contractor knows who to call at any hour and who can stop the work; an isolated worker has a watched check-in. **Law, r 48** **Good practice** the induction record, the check-in log		
☐	Each route was checked: WHS notification, the site preserved, the 2025 routes where adopted; any lead notifier agreed, each business still meeting its own duty. **Law, model Act ss 35 to 39A** page 20, the notifications made, timed		
Across the portfolio			
☐	Officers receive a regular report that verifies the checks happen, not only that the policy exists. **Good practice; taking reasonable steps to verify is part of an officer's due diligence, s 27(5)(f)** the report, dated		
☐	When an FM contract changes hands and management or control passes with it, the asbestos registers go too. **Law, r 428, so far as is reasonably practicable** handover record		

13 TEMPLATE

The building duty map.

One row per building; the first row is an example. It settles who is meant to do each check before the job starts, not after something goes wrong.

Building	Owner	Manages or controls, and for what	Engages the trades	Tenant fit-out: who approves the trades	Asbestos register, last reviewed	Fire isolations approved by	Record kept by
Example Plaza, Sydney	*Example Property Fund*	*FM company: maintenance. Owner: capital works. Tenants: their premises*	*FM company*	*Centre manager, against the base building standard*	*Yes, March 2026*	*Building manager; on-call manager after hours*	*FM company, shared with the owner*

Fill it in with the owner.
The owner and the FM company should agree each row. Where they disagree, there is a gap in who does what, and the duty does not wait for it to close.

Review it at handover.
A new FM provider, a new managing agent, or a sale changes the map. Where management or control passes, the outgoing holder must, so far as is reasonably practicable, pass the asbestos register to the incoming one (r 428).[3]

Keep it with the record.
The map is only useful if the people checking contractors can see it when a trade turns up.

14 ONE STANDARD ACROSS A PORTFOLIO

The same standard at every building.

Everything in this guide needs to work at every building, on the same day, whether or not anyone from the building team is there.

Questions to ask about how you manage it today.

1. If an owner asked which trades worked in one of their buildings this year, and what each held on the day, how long would the answer take?
2. How many times has your most-used contractor been onboarded across your buildings, and do all those copies agree?
3. When a contractor sends a new worker, is that worker checked before arriving, on arrival, or not at all?
4. When a tenant's fit-out crew arrives, who has checked them against your building's standard?
5. Who can authorise a fire system isolation at 2am, and who confirms it is back on?
6. At a building with nobody on site after hours, what stops a worker who is not cleared?
7. When an FM contract changes hands, could you hand over the registers and the contractor history in a day?
8. How many hours a month go on chasing documents and typing them into spreadsheets?

What to look for in a system.

- **One standard, per-building rules.** What every contractor must hold, with each building's own requirements on top.
- **Checks that reach the worker.** Licences, inductions, and cards held against each person, not only the company.
- **Contractors keep it current.** Trades upload their documents once, and every building measures them against its own list.
- **Expiry tracked for you.** A warning before a document lapses, not a discovery after it has.
- **A door that works unattended.** Sign-in checked against the building's requirements and a permit or work order, with the asbestos register shown at sign-in.
- **Connected to what you already run.** Property and maintenance systems, work orders, procurement, and access control, so nothing is typed twice.
- **A view across every building.** Tenants' crews included, in a report an owner or an officer can read.

START SMALL

Start with the buildings that worry you most.

Whatever you use today, take 5 buildings and their regular trades and run the checklist on pages 22 and 23 against them. Close the gaps it shows first, and ask anyone offering a system to show each point above on your own buildings.

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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 and Regulations 2017, the NSW and Queensland rules named in it, and regulator guidance, as read on the dates above. Each jurisdiction enacts its own version and its numbering can differ; model codes of practice apply in a jurisdiction once it adopts them. For a decision about your own buildings, read the law in your jurisdiction and take legal advice.

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COMPLYFLOW

Compliance you can prove, instantly.

Every contractor, worker, site, and process. Every time.

Happy to talk it through.

If you have questions about anything in this guide, how it applies to your own buildings 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.

Contact Us

complyflow.com/contact

Keep reading: our page for property and facilities management, and the rest of the Contractor Compliance Guides at complyflow.com/ebooks-reports.

Trusted by teams at **CBRE**, **Qantas**, **Auckland Transport**, and **Australian Catholic University**. Sydney-based since 2009, ISO 27001 certified, serving Australia and New Zealand.