

GUIDE AND CHECKLIST

Contractor compliance for property and FM: the duty, the record, and the checks.

For property owners, managing agents, and facilities management companies. The duties you owe the contractors on every site you manage, the record that shows you met them, and the checks to run before a trade walks in.

Current to October 2026

Model WHS laws as at 5
December 2025

Includes

A pre-start checklist and a building
duty map

Covers

The model WHS states, with Victoria and
NSW named

START HERE

The short version.

A contractor who carries out work for your business in a building you own or manage is, in the eyes of work health and safety law, one of your workers, and your duty also reaches workers you cause to be engaged or whose work you influence or direct. The duty you owe them does not shrink because someone else employs them, and it cannot be handed to the FM company, the managing agent, or the contractor in a clause.

- 1 Contractors are workers.** 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. Safe Work Australia's own example puts that duty on the building owner and the property manager.^{2,5}
- 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.** A business must see written evidence of a high risk work licence before it directs or allows the work, and the person with management or control must give the asbestos register to a business whose work risks exposure.³
- 5 Victoria is different.** It runs its own Occupational Health and Safety Act 2004, with its own duties to contractors and for whoever manages or controls a workplace, framed differently from the model laws.^{7,8}

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01 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."¹ The model Act sets that duty "so far as is reasonably practicable" (section 19).²

Contractors are workers.

A person is a worker if they carry out work in any capacity for a PCBU, including as "a contractor or subcontractor" or "an employee of a contractor or subcontractor" (section 7(1)).²

Engaged or directed is enough.

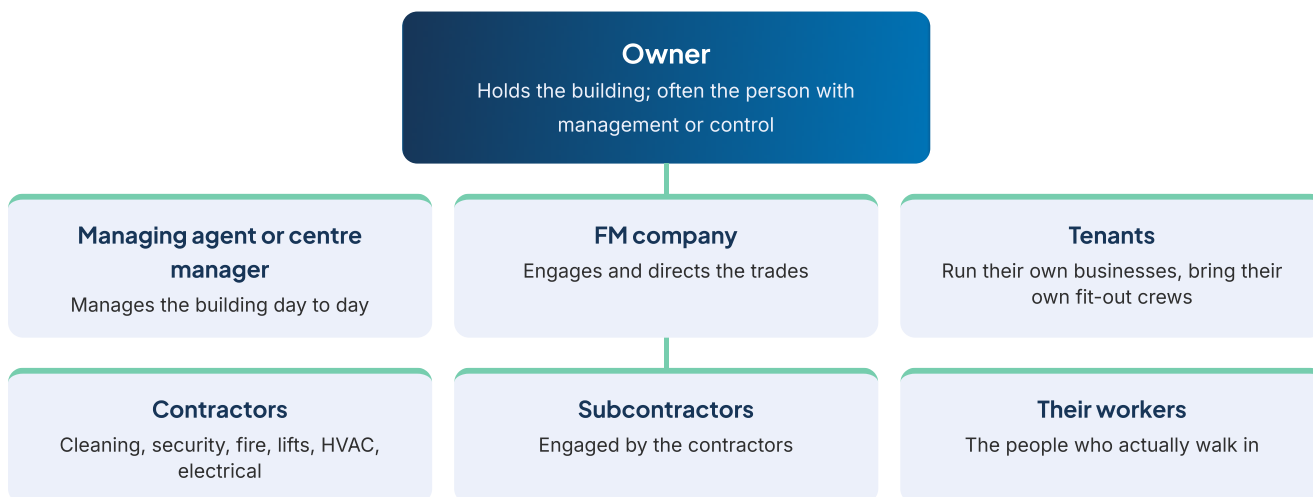
The business must ensure, so far as is reasonably practicable, the health and safety of workers "engaged, or caused to be engaged" by it, and of workers whose activities in carrying out work are "influenced or directed" by it, while the workers are at work in the business (section 19(1)). That can reach 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

Who is a PCBU at a shopping centre.

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



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 fact to be determined in 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.

02 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

A parallel duty applies to whoever manages or controls fixtures, fittings, or plant: lifts, plant rooms, switchboards, and building services. They must ensure, so far as is reasonably practicable, that the fixtures, fittings, and plant are without risks to the health and safety of any person (section 21(2)).²

"Reasonably practicable" means what is, or was at a particular time, reasonably able to be done, weighing up all relevant matters, including: how likely the risk is, how much harm it could do, what the person knows or ought reasonably to know about it and the ways to deal with it, and what is available and suitable; then, after assessing the risk and those ways, the cost, including whether it is grossly disproportionate to the risk (section 18).²

Who holds it at a managed building.

The owner and the property manager.

In the lift maintenance example in Safe Work Australia's code of practice, "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."⁵

An FM company or agent can too.

WorkSafe Victoria describes a person who "has legally been assigned management or control duties over a workplace (such as a management group or agent that may or may not be located at the workplace)".¹⁰ That is Victoria's regulator writing under Victorian law. Whether an FM contract does the same turns on what the contract assigns.

Usually the owner, in Victoria.

WorkSafe Victoria's asbestos guidance says the person with management or control is "usually" the owner of the workplace or a representative of the owner.¹⁰

Usually not the tenant.

The same guidance says: "Generally, a person who leases a building and runs a business from that building is not the person with the management or control of the workplace."¹⁰ A tenant still owes its own duties to its own workers and contractors.

What we recommend: write down, for each building, who manages or controls it and for what. An FM contract that says the FM company runs maintenance but the owner approves capital works sets 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 Both halves need a name against them.

03 SHARED DUTIES

Shared, but never handed over.

An owner, a managing agent, an FM company, the tenants, and the contractors can all hold a duty about the same lift, the same roof, or the same loading dock. The model WHS Act sets four rules for that.

- 1 More than one person can hold the same duty.** "More than 1 person can concurrently have the same duty" (section 16(1)).²
- 2 Each acts to the extent of its influence and control.** Each must discharge 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 They must work 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 Nobody can transfer it.** "A duty cannot be transferred to another person" (section 14).² A contract term that tries to exclude, limit, or modify a duty, or transfer it to someone else, is void (section 272).²

"WHS duties cannot be contracted out to another party, such as a subcontractor."

Safe Work Australia, WHS duties in a contractual chain, March 2022⁶

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

Formally, on a large site. "The owner of a large shopping centre may need formal mechanisms with the retail businesses, for example written agreements and consultative committees."⁵

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." It also calls a record of consultation good practice.⁶

FOR THE CONTRACT MANAGER

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

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 what, who keeps the record, and who calls the coordination meeting, and every party should still be able to show what it did.

04 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) (section 4), so 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

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. Verification is evidence that it did: at which building, against which requirements, on which day.

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.
- Incidents and near misses involving contractors, and what changed.

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, from the same record, is the simplest way for each to show the verification step.

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

05 STATE BY STATE

One model, with Victoria apart.

Western Australia's Work Health and Safety Act 2020 received assent on 10 November 2020²⁹ 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, so section and regulation numbers can differ.

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). ¹⁷ It uses the model numbers for r 85, r 289, r 291, r 292, r 299, r 425, r 427, r 428, r 448, and r 449 (checked 29 September 2026). ¹⁸	Those provisions apply in NSW under the same numbers; check any other number before quoting it. In NSW, SafeWork NSW says a principal contractor needs to make sure its subcontractors hold workers compensation, and names SIRA as the agency responsible for workers compensation. ¹⁹
Victoria	Occupational Health and Safety Act 2004 (Vic) and the Occupational Health and Safety Regulations 2017 (Vic). ^{11, 28} 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.
Queensland, South Australia, Tasmania, Western Australia, the ACT, and the Northern 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, ¹⁶ SafeWork SA on contractor management, ¹⁵ and WorkSafe Tasmania on contractor management. ¹⁴ Check each jurisdiction's numbering before quoting it.

One figure that differs.

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; NSW r 292). In Victoria the figure is AU\$350,000, and the owner is the principal contractor unless it appoints one and authorises it to manage or control the workplace (OHS Regulations 2017, r 332 and r 333).^{3, 18, 28}

06 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.

Construction work includes the construction, alteration, repair, maintenance, refurbishment, or demolition of a structure (r 289(1)), and it expressly includes "the installation, testing or maintenance of an essential service in relation to a structure" (r 289(2)(e)). It does not include "testing, maintenance or repair work of a minor nature carried out in connection with a structure" (r 289(3)(d)).³ The Regulations define essential services as the supply of gas, water, sewerage, telecommunications, electricity, and similar services, or of chemicals, fuel, and refrigerant in pipes or lines (r 5(1)); they do not name air conditioning.³

Rule	What it requires
R 291 High risk construction work	Construction work that "involves a risk of a person falling more than 2 metres", work "on or near energised electrical installations or services", work in an area with "any movement of powered mobile plant", and work likely to disturb asbestos, among others. ³
R 299 Safe work method statement	Each business whose business "includes the carrying out of high risk construction work" must, before the work starts, ensure a safe work method statement is prepared, or has already been prepared by someone else (r 299(1)). A principal contractor must take all reasonable steps to obtain a copy before the work starts (r 312). ³ Below that, seeing it before work starts is our recommendation, not a rule.
R 85 High risk work licences	A business "must not direct or allow a worker to carry out high risk work for which a high risk work licence is required unless the person sees written evidence" of the licence. ³ Licence classes include dogging and slewing mobile cranes. ³
R 293 Principal contractor	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. ³ A project has only one principal contractor at a time. ³
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 of AU\$250,000 or more. It is a model provision; Victoria's Regulations are not covered by this row. ³

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."¹⁶ Handing a contractor the keys hands over the work, not the duty.

07 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.

R 422

Ensure, so far as is reasonably practicable, that all asbestos or asbestos-containing material at the workplace "is identified by a competent person."³

R 427

Keep the register readily accessible to workers and businesses that have carried out, carry out, or intend to carry out work at the workplace, their health and safety representatives, and businesses that require work to be done there. Where that work involves a risk of exposure to airborne asbestos, ensure the business "is given a copy of the asbestos register."³

R 429

Where asbestos is identified or likely to be present, ensure "a written plan (an asbestos management plan) for the workplace is prepared."³

R 425

Ensure that a register "is prepared and kept at the workplace." It must be maintained so the information in it is up to date (r 425(2)). It applies to buildings whenever constructed, unless the building was constructed after 31 December 2003 and no asbestos has been identified, and none is likely to be present.³

R 428

When management or control changes hands, ensure so far as is reasonably practicable that the register "is given to the person, if any, assuming management or control of the workplace." That is the moment an FM contract moves to a new provider.³

R 449

Before demolition or refurbishment of a structure or plant constructed or installed before 31 December 2003, give the business doing it a copy of the register, which must be reviewed first (r 448). Minor or routine maintenance is not demolition or refurbishment (r 447).³

When an owner renovates.

In an example in Safe Work Australia's asbestos code, an arcade owner renovating a shop with contractors "has management and control over the workplace and is responsible for ensuring the current asbestos register is updated due to the work that is being carried out".²¹

In Victoria.

A person who manages or controls a workplace "must record in an asbestos register ... the results of an identification of asbestos" (OHS Regulations 2017, r 227(1)).²⁸ 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, 23}

5 years

Asbestos register review.

At the latest. A register must be kept up to date, not only reviewed on a timetable. Under the model Regulations it must be maintained so its information is up to date (r 425(2)). It must also be reviewed whenever further asbestos is identified, asbestos is removed, disturbed, sealed, or enclosed, or the asbestos management plan is reviewed, which must happen at least once every 5 years (r 426, r 430(1)(e)).³ In Victoria it must be revised to keep it current, including any change of condition and any removal, enclosure, or sealing, and reviewed at least every 5 years (OHS Regulations 2017, r 228).²⁸

08 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 to isolate and reconnect the supply.

Before anyone climbs a ladder, five things are live, and each one has a name against it. In NSW, r 85, r 289, r 291, r 299, r 425, r 427, r 448, and r 449 sit in the Work Health and Safety Regulation 2025 (NSW) under the same numbers as the model Regulations.¹⁸

What is live	Why	What gets checked and kept
The contractor's documents	Contractors are workers of the businesses they work for. ² WorkSafe Tasmania advises asking a tendering contractor for evidence of its workers' licences and certificates and its safety record. ¹⁴	Company prequalification current; insurance and workers compensation current; the electrician's licence on file
The crane	If the crane is a slewing mobile crane, its operator needs the high risk work licence for its capacity class, and whoever slings the load or directs the operator when the load is out of view needs a dogging licence (model Regulations, Schedule 3). The business must see written evidence before it directs or allows the work (r 85). ³	Both licences sighted before the lift, with expiry dates
The method	If replacing the unit is construction work (r 289; work of a minor nature is excluded), then work with a risk of a person falling more than 2 metres, work on or near energised electrical installations, and work in an area with any movement of powered mobile plant is high risk construction work (r 291), and the contractor must ensure a safe work method statement is prepared before it starts (r 299). ³	The SWMS received and read before Saturday, not on the roof
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 the job is refurbishment of a structure or plant built or installed before 31 December 2003, the register must also be reviewed, and a copy given before work starts (r 448, r 449). ³	The register for the roof and plant room given to the contractor, with the date
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

On paper.

The centre manager is off on Saturday. The crane arrives early; the dogger's licence is "in the truck". The SWMS was emailed on Friday night to an inbox nobody checks at weekends. The asbestos register is in a folder in the locked centre office.

On one record.

The contractor's company and workers were checked against this centre's requirements when they were engaged. On Saturday each worker signs in on their own phone; where the centre is set up that way, anyone not cleared is stopped. The register and the SWMS are already on the job.

09 THE RECORD

What to hold for every contractor.

Four levels, each with its own evidence. The tags show which items are a legal requirement under the model laws, which come from regulator guidance, and which are good practice that the law does not itself require. Keeping the three apart stops a team over-claiming what the law demands, or under-doing what it does.

LAW a provision of the model WHS Act or Regulations

REGULATOR guidance from Safe Work Australia or a state regulator

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 ¹⁴
	Insurance and its limits, settled before the work starts	GOOD PRACTICE WorkSafe WA, written under the pre-2022 law; no duty to check it found in WHS law ²²
	Workers compensation current, at a sufficient level	REGULATOR SafeWork NSW, for principal contractors and contractors who subcontract; in NSW a workers compensation law matter, administered by SIRA ¹⁹
	The contract: WHS roles, action on non-compliance, incident reporting, inductions, and telling you when they are on site	REGULATOR WorkSafe Tasmania ¹⁴
The worker	Written evidence of any high risk work licence, sighted before the work, and a record of it kept for at least 1 year	LAW r 85(1) and (4) ³
	For construction work, evidence of general construction induction training	LAW r 317 ³
	Qualifications, licences, and certificates for the work	REGULATOR WorkSafe Tasmania ¹⁴
The site	An induction before they start, so they know your safety expectations and standards	REGULATOR WorkSafe Tasmania ¹⁴
	The asbestos register accessible, and a copy given where the work risks exposure	LAW r 427 ³
	The SWMS for any high risk construction work, before it starts	LAW r 299 for the business doing the work; r 312 if you are principal contractor; otherwise good practice ³
The visit	Who is on site and who is not: sign in and sign out	GOOD PRACTICE WorkSafe WA, pre-2022 law ²²
	Supervision proportionate to the work, higher for new contractors, high risk work, and complex work	LAW s 19(3)(f); levels from WorkSafe Tasmania ^{2, 14}
	A record of consultation with the other duty holders	REGULATOR Safe Work Australia calls it good practice ⁶

What we recommend: one record per contractor, checked once at company level and then against each building's own requirements.

10 CHECKLIST

Before a contractor starts.

Check	Owner	Date checked
Know who holds the duty		
☐ We know who manages or controls this building, and for what. Good practice the building duty map, page 13		
☐ The FM contract says who checks contractors, who keeps the record, and who coordinates. Good practice the clause, and who holds the record		
Before engagement		
☐ The company was assessed against clear selection criteria, including its safety record. Regulator the prequalification, dated		
☐ Insurance and workers compensation are current, with their expiry dates on file. Good practice; workers compensation: Regulator, SafeWork NSW, for principal contractors certificates and expiry dates		
☐ Workers' licences, certificates, and qualifications for the work are on file. Regulator documents against each worker		
Before the first visit to this building		
☐ The contractor has been inducted to this building's rules and hazards. Regulator induction completion, per worker		
☐ For construction work, each worker holds a general construction induction training card. Law, r 317 card number, per worker		
☐ The asbestos register is accessible to them, and a copy given if the work risks exposure. Law, r 427 register version and date given		
☐ For high risk construction work, the SWMS has been received and read. Law, r 312, if you are principal contractor: take all reasonable steps to obtain a copy; reading it is good practice the SWMS, and who read it		
☐ Tenants and other contractors affected by the work have been consulted. Law, s 46, so far as is reasonably practicable, where a duty is shared a note of who agreed what		
On the day		
☐ Any high risk work licence was sighted before the work, not after. Law, r 85 licence number, class, expiry		
☐ Every worker signed in and out, including after hours at an unattended building. Good practice sign-in records by building		
☐ Supervision matched the work: higher for new contractors and high risk work. Law, s 19(3)(f), so far as is reasonably practicable; levels from WorkSafe Tasmania who supervised, and how		
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, the asbestos registers go with it. Law, r 428, so far as is reasonably practicable, where management or control passes handover record		

11 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	Asbestos register, last reviewed	Coordination with tenants	Record kept by
<i>Example Plaza, Sydney</i>	<i>Example Property Fund</i>	<i>FM company: maintenance. Owner: capital works</i>	<i>FM company</i>	<i>Yes, March 2026</i>	<i>Monthly tenant meeting</i>	<i>FM company, one record</i>

Fill it in with the owner.

The owner and the FM company should agree each row. Where they disagree, the duty has a gap.

Review it at handover.

A new FM provider, a new managing agent, or a sale changes the map, and the outgoing holder of management or control 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.

12 ONE RECORD ACROSS A PORTFOLIO

Check once. Prove it at every building.

A facilities team does not run one workplace. It runs 20, or 200, each owned by someone else, with tenants whose own trades come and go, and many of them empty after hours.

Spreadsheets and sign-in books per building cannot answer the question that matters: who was on site, and what did they hold on the day.

ComplyFlow is Contractor Management Software: one record for every contractor, worker, site, and process, so nothing is entered twice and a status set once is what every gate knows.

One standard, per-building rules.

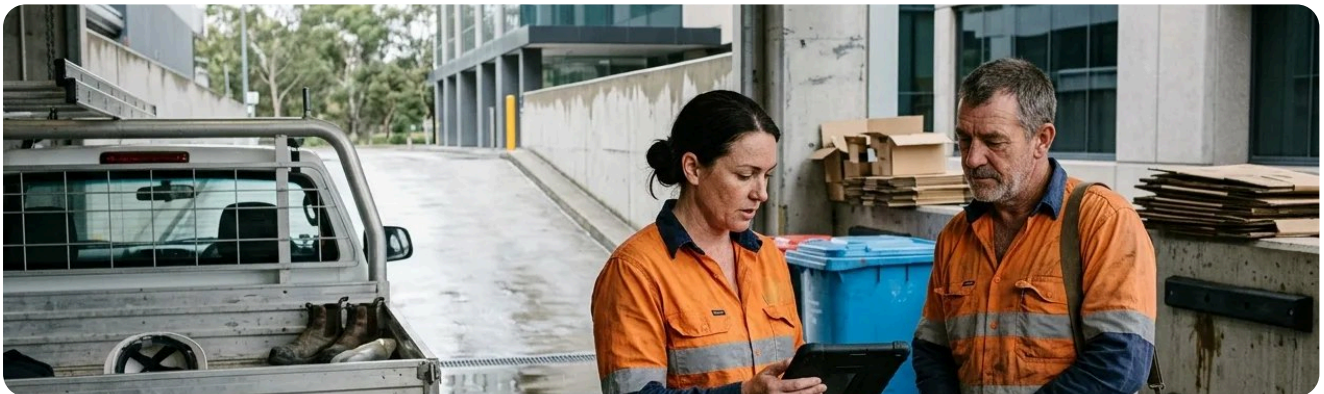
Set what every contractor must hold, then add each site's own requirements on top.^{24, 25}

Contractors keep it current.

Trades upload their insurances, licences, and qualifications once, and each building measures them against its own list.²⁴

The door works unattended.

Workers sign in on their own phone. Where a building is set up that way, anyone not cleared is stopped, and the site documents, such as the asbestos register, are shown at sign-in.²⁶



The check happens at the door of each building, whether or not anyone from the building team is there.

A live list of who is in each building.

The same sign-in gives a live view of who is signed in at each site.²⁷

One record to search.

When an owner asks which trades worked in a building this year and what each held, the answer comes from one record rather than a hunt through sign-in books.

START SMALL

Start with the buildings that worry you most.

Put 5 buildings and their regular trades on the record, then run the checklist on page 12 against it. The gaps it shows are the ones worth closing first.



Compliance you can prove, instantly.

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

Try it on your own buildings.

Two ways to see whether ComplyFlow would answer "who was on site, and what did they hold" for your portfolio.

Create a free account.

The Starter plan is free for up to 5 users and 5 sites. No credit card required.

Create Free Account

complyflow.com/create-free-account

Book a demo.

See a trade checked against one building's requirements, signing in at an unattended door, and the record an owner would ask for.

Book a Demo

complyflow.com/request-demo

1

Create your free account.

5 users and 5 sites, no card.

2

Add 5 of your buildings.

Set what a contractor must hold at each.

3

Run this guide's checklist.

Against the record, not against memory.

Keep reading: complyflow.com/blog/contractor-management-software-for-facilities-management, and our page for property and facilities management.

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

SOURCES

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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 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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