COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

State and Federal Government: the contractor compliance guide.

What Australian law asks of government agencies when contractors work on their sites, and how to prove you met it.

Current to November 2026
Commonwealth WHS Act as compiled 1 July 2024; Procurement Rules of 17 November 2025; all read 11 and 12 November 2026

Includes
A checklist, an incident card, and an agency site map

Covers
Commonwealth and state agencies: offices, fit-outs, and secure sites, with prompts for laboratories and depots

START HERE

The short version.

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

More than one law can reach a government building, and the cleaner, the security officer, the HVAC technician, the IT contractor, and the fit-out crew all work there for the agency.

1 **Which law applies depends on who you are.** The Commonwealth, acting through its departments, and each Commonwealth public authority are under the Commonwealth WHS Act and Comcare wherever they work; state and territory WHS laws do not apply to them. A state or territory agency is under its own law at home, and checks first when it works across a border (page 5).[1]

2 **Your contractor may answer to a different law.** Comcare says a contractor engaged by a Commonwealth agency may be a business in its own right under its state or territory's law. Both laws can apply in one workplace, and where both hold a duty on the same matter, the Commonwealth duty holder has to consult, co-operate, and co-ordinate with the other (page 7).[1, 7]

3 **Officers are named by what they decide, and the duty is personal.** Under the Commonwealth Act, a person who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business is an officer, and must exercise due diligence (page 8).[1]

4 **The tender is not the safety check.** The Commonwealth Procurement Rules require officials to make reasonable enquiries about tenderers' workplace health and safety practices. Checking each worker before the work comes from the WHS law, whatever the tender found (page 11).[1, 12]

5 **A security clearance is not a safety check.** A clearance settles who may see what, and agency security, not an expiry date, confirms it is current. It says nothing about the electrician's licence or the floor's emergency plan, so hold both, separately (page 14).

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01 THE PRACTICAL TEST

The practical test is what you can show.

An agency approves a contractor once, through a panel or a standing offer. That contractor's people then work at offices, laboratories, and sites the panel never sees. The question an auditor, a regulator, or a parliamentary committee asks is simple: who was there, and what did they hold on the day?

An approved panel is not a ready worker.

Most agency checks stop at the company. The law reaches further. A contractor's employees who carry out work for the agency are its workers too, for WHS purposes (section 7(1)),[1] and before anyone does high risk work that needs a licence, the business directing or allowing it must see written evidence of that licence (r 85).[2] A cleaning company on the panel since 2023 says little about the night cleaner it sends to a new building tomorrow.

ASSESSED BEFORE ENGAGEMENT; REVIEWED ON ANY CHANGE

The company

- ✓ Assessed for the panel or the tender, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Its statutory workers compensation cover, its public liability insurance, and their dates (page 24)
- ✓ The contract: who checks, who authorises the work, and who reports what

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

Each worker, at each site

Office | Laboratory | Secure site

- ✓ Any high risk work licence, of the right class and current, sighted before the work: that one is law[2]
- ✓ Inducted to this site, signed in, authorised for the task, and supervised to match the work
- ✓ Any security clearance the role needs, confirmed by agency security as a separate question (page 14)

Where it usually breaks.

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

Three registers for one person.
Procurement holds the panel, security holds the clearance, and WHS holds the licence. Nobody holds all three for the same worker.

Checked by hand.
Someone opens each certificate and types its expiry date into a spreadsheet. It holds until that person is on leave, or a fit-out brings 40 new workers in a month.

A building you share.
The agency leases three floors; the building owner's facilities provider runs the dock, the risers, and the roof plant. Contractors sign in at two desks, or at neither.

No view across the estate.
Nobody can say which contractors are current across every site, or who was in the comms room last Tuesday.

One standard, every site. One requirement set for every contractor, each site's own requirements on top. Each gap above makes the verification step of an officer's due diligence harder to show: due diligence includes taking reasonable steps to verify the provision and use of the business's health and safety resources and processes (section 27(5)(f)).[1]



02 WHICH LAW APPLIES

Two WHS laws can meet in one building.

A Commonwealth department is under the Commonwealth Work Health and Safety Act 2011 wherever it works, with Comcare as its regulator. A state agency is under its own state's law at home, and checks first when it works across a border. The contractors in either building usually answer to the law of the state or territory where they work.

> **"A corresponding WHS law does not apply in relation to the Commonwealth or a public authority."**
>
> Work Health and Safety Act 2011 (Cth), section 12(3). A corresponding WHS law is a state or territory WHS or OHS Act[1]

02 WHICH LAW APPLIES

Start with who runs the business, not where the building is.

Two questions settle it for most agencies. Ask them for the agency, then again for each business that works on its sites.

Is it the Commonwealth, or a Commonwealth public authority?

"Commonwealth" covers each non-corporate Commonwealth entity, normally a department of state, says Comcare. A public authority is a body corporate set up for a public purpose under a Commonwealth law, a Commonwealth company, or a body the Regulations name, unless the Regulations exclude it (section 4; r 6C). [1, 2, 11]

Yes → **The Commonwealth Act, and Comcare.** State and territory WHS laws do not apply to it (section 12(3)), in its own building or a leased one. [1]

No ↓

Is it a state or territory department, agency, or authority?

Each state and territory WHS or OHS Act we read binds that jurisdiction's Crown: Victoria's (s 6), and those of WA, Queensland, SA, Tasmania, the ACT, and the NT; in NSW, check your own. [5, 6, 23-27] The ACT and NT administrations are not Commonwealth businesses for the Commonwealth Act (section 12(2)). [1]

Yes → **Its own jurisdiction's Act.** In Victoria, the Occupational Health and Safety Act 2004, under which the Crown is a body corporate (s 6). [5]

No ↓

A contractor, a building owner, or a facilities provider.

Comcare's guidance: a contractor engaged by a Commonwealth business may be a business in its own right, "subject to the health and safety laws of their relevant State or Territory", and a building contractor on a Commonwealth job is likely to come under that law. [7, 8]

So → **Usually the law of the place.** The state or territory law where it works, with its own regulator, unless it is a 'non-Commonwealth licensee' (a business that held a Comcare licence before the Commonwealth Act began), which stays under the Commonwealth Act during its transitional period (section 12(4) to (6)): ask. [1]

Across a border, or under a special regime. A state agency working in another jurisdiction, or on a site with its own regime such as a mine, checks which law covers the work first. The ACT's WHS Act, for one, binds not only the ACT Crown but, so far as its Assembly's power permits, "the Crown in all its other capacities". [26]

Where the two laws meet.

One building can hold duty holders under both laws at once. The Commonwealth Act says so, and adds a duty of its own that the model Act does not have.

Both laws can apply.

"Both this Act and a corresponding WHS law may apply in relation to a worker or a workplace" (section 12(9)). Nobody is convicted twice of the same offence for the same act (section 12(10)). [1]

The Commonwealth side must coordinate.

Where a duty under the Commonwealth Act and a duty under a state or territory law cover the same matter, the Commonwealth duty holder has to consult, co-operate, and co-ordinate activities with the other person (section 12B). [1]

Both regulators may need to hear.

Comcare says a contractor on a Commonwealth site may have to notify both Comcare and its state or territory regulator, and that the agency and contractor should agree who notifies Comcare (page 20). [7, 9]

Our view: record each party's Act and regulator in the agency site map (page 29).

03 THE DUTY HOLDERS

The agency is the business.

Work health and safety law puts its main duty on a "person conducting a business or undertaking", a PCBU, whether or not it runs for profit or gain. Under the Commonwealth Act, the Commonwealth is one, acting through its departments, and a public authority is one in its own right.[1, 11]

Who the agency owes the duty to.

Three sections decide it, worded as in the model Act, and together they reach well past the agency's own staff.

Contractors are workers.

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

Engaged or directed is enough.

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

Each site carries its own duty.

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

Who is at a government site.

The agency sits at the top. Everyone below it brings people into the building, and each needs a place in your checks.

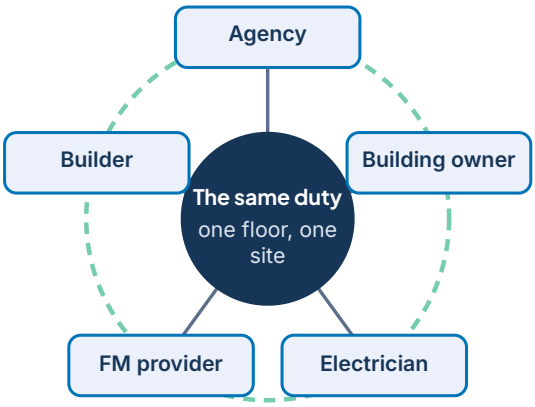


Our view: write down who manages or controls each part of each site. A leased floor in a tower is where it is most often unwritten.

03 SHARED DUTIES

Shared, but never handed over.

A fit-out on a leased floor puts the agency, the building owner, the builder, the electrician, and the facilities provider in one place. Four rules apply to every one of them, and a fifth to a Commonwealth agency.



Consult, cooperate, and coordinate

1. **Held at once, each to its own control.** "More than 1 person can concurrently have the same duty" (section 16(1)). Each keeps responsibility for its own duty and must discharge it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1]
2. **Worked together.** Each "must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter" (section 46).[1]
3. **Workers consulted too.** So far as is reasonably practicable, each consults the workers who carry out work for it, contractors' workers included, who are, or are likely to be, directly affected by a health and safety matter, and involves their health and safety representative where they have one (sections 47 and 48(2)).[1]
4. **Never transferred.** "A duty cannot be transferred to another person" (section 14). A contract term that tries to exclude, limit, or modify a duty, or transfer it, is void (section 272).[1]
5. **Across two laws, for a Commonwealth agency.** Where its duty and a duty under a state or territory law cover the same matter, it has to consult, co-operate, and co-ordinate with the other duty holder (section 12B).[1]

> **"WHS duties cannot be contracted out to another party, such as a subcontractor."**
> Safe Work Australia, WHS duties in a contractual chain, March 2022[21]

In Victoria.

Victoria's OHS Act has no general version of section 46. Its consult, cooperate, and coordinate duty between duty holders is limited to labour hire workers (s 35A). The employer's duties to its contractors (s 21) and to other people (s 23), and the duty of whoever manages or controls the workplace (s 26), still apply to each business on the floor (page 10).[5]

What Comcare asks an agency to do with its contractors.

Where the agency relies on a contractor's specialist expertise, Comcare says it is required to take five steps. Relying on a contractor to comply "does not automatically result in compliance" by the agency.[7]

1. **Expertise.** Verify the contractor has the expertise the work needs.
2. **Systems.** Verify it has its own systems for working safely.
3. **In use.** Verify it works safely, to its own stated procedures.
4. **Coordinate.** Keep consulting, co-operating, and co-ordinating with it.
5. **Instruct.** Give the contractor appropriate instruction.

Comcare, Contractor management: guidance for Commonwealth PCBUs.[7]

04 OFFICERS

Due diligence is personal.

An officer of a PCBU "must exercise due diligence to ensure that the person conducting the business or undertaking complies with that duty or obligation" (section 27(1)). An officer can be convicted whether or not the agency is (section 27(4)).[1] Who is an officer of the Commonwealth, under its Act:

Is the person a Minister, acting as one?
"A Minister of a State or the Commonwealth is not in that capacity an officer" (section 247(2)).[1]

Yes →

Not an officer, in that capacity.
The exclusion is personal to the Minister. Our view: identify every other officer by what they actually decide; the agency's own duty is unchanged.

No ↓

Do they make, or participate in making, decisions that affect the whole, or a substantial part, of the business or undertaking?
That is the test for an officer of the Commonwealth (section 247(1)) and of a public authority (section 252).[1]

Yes →

An officer.
In a department, that can include the secretary and the senior executive: it is decided by the role, not the title.

In Western Australia and Victoria.

WA's WHS Act 2020 names them: in a department of the Public Service, the chief executive is an officer of the Crown, and so is anyone directly responsible to the chief executive who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business (s 4A).[6] Victoria's OHS Act takes "officer" from the Corporations Act (s 5(1)); an officer of a body corporate, "including a body corporate representing the Crown", commits an offence where its contravention is attributable to the officer's failure to take reasonable care (s 144).[5]

What the executive can ask for.

Four regular reports that show the checks happen, not only that they are planned: evidence for the verify step on the next page. Counts are not enough on their own, so two of them sample the work itself.

- Contractors engaged this quarter, by division and site, and how many were checked before their first visit.
- Licences and tickets due to lapse in the next 30 days, and any clearance agency security has flagged, by site.
- High risk work authorised, how much was checked on site, and a sample of permits and SWMS compared with the work done.
- Incidents, which regulator was told, and the corrective actions still open past their due date.

04 OFFICERS

Due diligence includes taking reasonable steps to:

Each card gives one of the six steps the Act lists, then what it can look like in an agency. The last, verify, checks that what (c) to (e) put in place is provided and used.

a

Know.

Acquire and keep up to date knowledge of WHS matters.

In an agency: a briefing when the WHS law, the regulator's notification rules, or the Procurement Rules change.

b

Understand.

The operations, and their hazards and risks.

In an agency: knowing which buildings are leased or shared, which hold asbestos, and where contractors work alone after hours.

c

Resource.

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

In an agency: one funded contractor process, used by every division and regional office, not only head office.

d

Hear and respond.

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

In an agency: contractor incidents reported to the same place as staff ones, including those the building manager hears of first.

e

Comply.

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

In an agency: a written route for who notifies Comcare or the state regulator, and who tells the building.

f

Verify.

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

In an agency: a regular report to the executive that shows the checks happened, not only that the policy exists.

Work Health and Safety Act 2011 (Cth), section 27(5)(a) to (f), worded as in the model Act;[1, 3] the examples are ours.

05 WHERE THE LAWS DIFFER

Nine WHS laws, real differences.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws." Some others have made substantial variations.[4] An agency meets the law that covers it, and its contractors meet theirs.

Law	What it says	What it means for an agency
Commonwealth	Work Health and Safety Act 2011 (Cth), regulated by Comcare. It binds the Commonwealth, which is liable for offences and faces the body corporate penalty (ss 10, 245E). Proceedings may specify the "responsible agency", the agency whose acts or omissions are alleged (s 248). Industrial manslaughter is an offence: up to 25 years' imprisonment for an individual, and AU$18,000,000 for a body corporate (s 30A).[1]	Comcare's indexed maximum penalties for a Category 1 offence, 2026-27: AU$3,546,000 or 15 years' imprisonment, or both, for an officer or an individual PCBU (s 31), and AU$17,728,000 for a body corporate, the Commonwealth included.[1, 10] Failing to notify an incident, 2026-27: up to AU$17,000 for an individual and AU$83,000 for a body corporate (s 38(1)).[10]
Victoria	Occupational Health and Safety Act 2004 (Vic). An employer's duties extend to independent contractors it engages, and their employees, "in relation to matters over which the employer has control or would have control if not for any agreement purporting to limit or remove that control" (s 21(3)(b)), and it must ensure, so far as is reasonably practicable, that people other than its employees are not exposed to risks from its undertaking (s 23). Whoever has the management or control of a workplace must ensure, so far as is reasonably practicable, that it and the means of entering and leaving it are safe and without risks to health, for matters it manages or controls (s 26).[5]	The Crown is a body corporate for the Act (s 6). Proceedings against the Crown name a responsible agency (s 146). Workplace manslaughter reaches an officer of an entity whether or not it represents the Crown (s 39G).[5]
Western Australia	Work Health and Safety Act 2020 (WA). It binds the Crown (s 10). Industrial manslaughter (s 30A): up to 20 years' imprisonment and AU$5,000,000 for an individual, and AU$10,000,000 for a body corporate. Its Category 1 offence is a failure to comply with a duty that causes death or serious harm (s 31).[6]	A department's chief executive is an officer by the Act's own words (s 4A, page 8).[6]
Every other state and territory	Each jurisdiction's own version of the model WHS Act and Regulations. The Queensland, South Australian, Tasmanian, ACT, and Northern Territory Acts we read on 11 November 2026 bind their own Crown.[4, 23-27] In NSW, SafeWork NSW says the Work Health and Safety Regulation 2025 (NSW) commenced on 22 August 2025, and that its provisions are now called sections.[22]	The duties are broadly alike, but text and numbering can differ: check your own jurisdiction's. SafeWork NSW says that from 1 July 2026 a NSW business must comply with approved codes of practice, or manage the risk to an equal or higher standard.[22]

Notifying an incident. The model Act as at 5 December 2025 adds new notification categories, but Safe Work Australia says they "only apply if adopted under local WHS laws".[31] The Commonwealth Act as compiled on 1 July 2024 does not include them, so Comcare notifications follow the earlier sections (page 20).[1]

Unless another law is named, section and rule numbers in this guide are the Commonwealth Act's and Regulations'. Those shared with the model laws keep the model numbering; the provisions about the Commonwealth itself (sections 10, 12, 12B, and 245E to 248) are its own. A state's own may differ, and Victoria's is a different Act.[1, 2]



06 PROCUREMENT

The Procurement Rules bind officials. The WHS law binds everyone on site.

The Commonwealth Procurement Rules are a legislative instrument that binds officials, not suppliers, and they are not a WHS law. Officials must make reasonable enquiries about a tenderer's workplace health and safety practices. Checking each worker before the work is the agency's WHS duty, whatever the tender found.

> **"Officials must make reasonable enquiries that the procurement is carried out considering relevant regulations and/or regulatory frameworks, including but not limited to tenderers' practices regarding … workplace health and safety"**
>
> Commonwealth Procurement Rules, 17 November 2025, paragraph 6.6 [12]

06 PROCUREMENT

Four layers, and what each one binds.

Government buying runs on several kinds of rule at once. Knowing which binds everyone, which binds only officials, and which binds the supplier only through the contract tells you where each check belongs.

Layer	What it says	Who it binds, and what it means for checks
WHS law	The Commonwealth Act, or the state or territory law, with its duties to workers and others (page 6). "A duty cannot be transferred to another person" (s 14), and a contract term that tries to is void (s 272). [1]	The agency and every contractor, each for its own duty. Some checks are law in their own right, such as sighting a high risk work licence before the work (r 85); a status check at the door each visit is our recommendation. [2]
The Procurement Rules	A legislative instrument made under the PGPA Act (s 105B). [29] Price is not the sole factor in value for money: officials must consider a potential supplier's "relevant experience, performance history and ethical conduct" (para 4.5), and make reasonable enquiries about tenderers' workplace health and safety practices (para 6.6). They must keep documentation for each procurement commensurate with its scale, scope, and risk, retained under the Archives Act (paras 7.2 and 7.5). [12]	Officials of non-corporate Commonwealth entities and the listed corporate entities, when doing procurement (para 2.2). [12] State agencies follow their own state's procurement rules.
The Supplier Code of Conduct	In effect for Commonwealth contracts entered from 1 July 2024; Finance says it is not retrospective. Relevant entities must put it into all Commonwealth forms of contract, unless an accountable authority documents a decision not to (para 6.13). [12] Its clause 3.1: suppliers "must comply with all applicable workplace health and safety laws". Where asked, they must be able to show appropriate policies, and failure may lead to remedial action or termination under the contract. [13]	The supplier and its subcontractors, through the contract. A declaration on file is evidence of a promise, not of a checked worker.
State policy, for example NSW	On every construction project, buyers must review contractors' WHS performance through the life of the contract, including monthly WHS management reports; over AU$1 million, they must agree and implement an audit schedule, which should include an audit within 3 months of the start of work on site and at least 2 audits over the project. [16]	NSW Government buyers, as procurement policy, not a statute. Other states set their own.

Build the check into the buy.

Five points where an agency buys work, and the WHS check that belongs at each.

1 Specify. The licences, tickets, clearances, and site rules the work needs, in the request.

2 Evaluate. The safety record and capability, weighted with price.

3 Contract. Who checks each worker, who authorises the work, who notifies.

4 Onboard. Check the company and its workers before the first site visit.

5 Every visit. Checked at the door, authorised, handed back.

Our recommendation: link the procurement and safety records for each contractor, with each team seeing what its role needs (page 15). The auditor, the regulator, and a parliamentary committee ask about the same contractors.

07 COMMONWEALTH-FUNDED BUILDING WORK

Commonwealth money can need an accredited builder.

The WHS Accreditation Scheme is law, not policy. The Commonwealth and its corporate entities must not fund building work unless the builders are accredited, except where the Rules exempt it. The Federal Safety Commissioner is the accrediting authority. [14]



Where the Scheme starts.

The Federal Safety Commissioner states the thresholds this way (fact sheet, January 2025; Rules as compiled 12 August 2023). Each figure includes GST, and under the Rules work by a subcontractor is exempt. [14, 15]

Directly funded.

An accredited builder must be engaged where a head contract for building work is worth at least AU$4 million. The Commissioner's examples include a fit-out or refurbishment of existing Australian Government office accommodation. [15]

Indirectly funded.

As the Federal Safety Commissioner published it in January 2025, a project is captured where the Commonwealth's contribution is at least AU$6 million and at least 50% of the total, or at least AU$10 million. An accredited builder is then needed for a head contract of at least AU$4 million. [15]

Below the line.

Accreditation is not the WHS duty. Under or over the thresholds, the agency and the builder each keep their own WHS duties, and a construction project may still need a principal contractor (below). [1]

A construction project has one principal contractor.

Under the Commonwealth Regulations, as under the model ones, a construction project is construction work costing AU$250,000 or more, and the business that commissions it is the principal contractor, unless it engages another business as principal contractor and authorises it to manage or control the workplace (r 292, r 293). [2] Victoria's principal contractor rules apply from AU$350,000 (r 332). [28] Our view: put the appointment in the contract, in writing. Whoever holds the role then:

Signs the site.

Its name and telephone numbers, including an after hours number, visible from outside (r 308). [2]

Writes the plan.

A written WHS management plan before work starts, and everyone who is to carry out construction work on the project made aware of it, so far as is reasonably practicable (r 309, r 310). [2]

Gets the SWMS.

All reasonable steps to get a copy of each safe work method statement before the high risk construction work starts (r 312). [2]

08 CLEARANCES, PRIVACY, AND RECORDS

A clearance is not a safety check.

On a secure site, a contractor may need a security clearance as well as the usual licences and induction. They answer different questions and come from different rules. One never stands in for the other.



Two checks, side by side.

The left column is security policy, reaching contractors through their contracts; the right is WHS law. A worker in a secure comms room needs both answered. For national security, defence, and certain police work, the Commonwealth Act does not require action that would prejudice them, and some agency heads may, with the Minister's approval, declare provisions not to apply or to apply with changes (sections 12C to 12E).[1]

The security check: policy

- The Protective Security Policy Framework, Release 2026, issued 1 July 2026. Non-corporate Commonwealth entities must apply it, by ministerial direction; for corporate Commonwealth entities it is better practice; state and territory agencies apply it to Commonwealth classified information they hold or access.[20]
- It reaches contractors through contracts: proportionate security terms (Requirement 0040), and reporting of security incidents (0042).[20]
- Personnel, contractors included, who need ongoing access to classified information are cleared to the appropriate level (0132), by the relevant Authorised Vetting Agency (0146), and see it only with a need-to-know (0131); security awareness training at engagement and each year (0024).[20]
- A clearance has a status, not only an expiry date: active, inactive, expired, or ceased (revoked or denied), and the vetting agency can extend an expiry date. Agency security confirms the status and level.[20]

The WHS check: law

- Written evidence of any high risk work licence, sighted before the work (r 85).[2]
- Information, training, and instruction suited to the work and its risks, such as a site induction (r 39).[2]
- The emergency plan for the workplace (r 43), and any permit, isolation, or safe work method statement the task needs (page 16).[2]

08 CLEARANCES, PRIVACY, AND RECORDS

Records and privacy.

Contractor records hold personal information, and in government they are public records too: three rules shape them.

The privacy principles bind the agency.

A Commonwealth agency is an APP entity (Privacy Act 1988 s 6(1), s 15). The employee records exemption covers only an "organisation", which excludes an agency (s 7B(3), s 6C). A state or territory authority is not bound by these principles (s 6(1), s 6C); it follows the privacy law or rules that apply to it. [17]

The contract carries them on.

An agency entering a Commonwealth contract must take contractual measures so its contracted service provider, and any subcontractor, does not do what would breach a privacy principle if the agency did it (s 95B). [17]

Records are not yours to discard.

Destroying or disposing of a Commonwealth record is an offence, unless a law requires it, the Archives permits it, or it is a normal administrative practice the Archives has not disapproved (Archives Act 1983 s 24). [18] State Records NSW says records made for outsourced government business remain State records, whoever holds them. [19]

How long to keep each record.

The legal minimums differ by record, and an incident extends several of them. These are floors, not destruction dates: keep each record for the longest of the minimum, your agency's records authority (for Commonwealth records, the Archives Act, above), and any hold for an incident or claim. [18]

Record	Commonwealth minimum	Kept by
High risk work licence evidence	At least 1 year after the high risk work (r 85(4)) [2]	The business that directed or allowed the work
Confined space risk assessment	At least 28 days after the work is completed; at least 2 years after a notifiable incident connected with it (r 77) [2]	The business that prepared it
Confined space entry permit	Until the work is completed; at least 2 years after a connected notifiable incident (r 77) [2]	The business that issued it
Safe work method statement	Until the high risk construction work is completed; at least 2 years after a connected notifiable incident (r 303) [2]	The business doing the work
Silica training record	While the worker does high risk silica processing, and 5 years after they stop working for the business (r 529CD) [2]	Each business training them
Notifiable incident record	At least 5 years from the day the regulator was told (s 38(7)) [1]	Each business with the duty to notify

Linked, not one open file. Licences, clearances, and incident records hold personal information. A Commonwealth agency handles them under the privacy principles, which its contracts must carry to its providers (above); [17] a state agency, under the privacy law or rules that apply to it. Our recommendation: link the records rather than pool them. Reception sees a status, not the document; clearance, vetting, and health details stay behind tighter access; each team sees what its role needs, access is logged, exports are limited, and the contract says how the records come back if the provider changes.

09 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 switchboard, isolate a fire system, or climb onto the roof plant: that takes a second step, and a handback.

The controls most jobs need.

Each row gives the control, what it means on a government site, and its source. The law names the duty; the form you keep for it is yours, unless the law, a contract, or policy sets it.

Control	What it means on a government site	Status and source
Task risk assessment	The job, the area, and the staff, visitors, and other contractors nearby assessed before work starts, and the controls agreed, not left to the crew on arrival.	**LAW** eliminate or minimise risks so far as is reasonably practicable (ss 17 and 19; Regulations Part 3.1 where a regulation applies it) [1, 2] **GOOD PRACTICE** the written assessment
Confined spaces	An enclosed or partially enclosed space not designed or intended primarily for people to occupy, at normal atmospheric pressure while anyone is in it, with a risk from its atmosphere, contaminants, or engulfment (r 5). Classify the space and the task, not the name. Before entry: a competent person's written risk assessment (r 66), and risk from connected plant and services eliminated or minimised, as by isolation (r 70). The space is purged or ventilated so far as is reasonably practicable, never with pure or enriched oxygen, and kept at a safe oxygen level while anyone works in it; air-supplied respiratory equipment is the answer only where that is not reasonably practicable and oxygen is below 19.5%, the floor published in the 2011 Regulations (r 71). Flammable gas is kept below 5% of its lower explosive limit so far as is reasonably practicable; at 10% or more, or 5% without a continuous detector, workers leave at once, as published in the same Regulations of 2011 (r 72). Communication and a standby person outside (r 69); rescue procedures set and practised (r 74). The written entry permit records them (r 67); it does not replace them.	**LAW** r 5, rr 66, 67, 69 to 72, 74 [2] **GOOD PRACTICE** the permit's layout, and the atmosphere tested by a competent person before and during entry
Permits and isolations	Hot work, roof access, and isolating power, water, or a fire system run as the agency's own permits, or the building's, each with a named person who issues and closes it. Electrical work is not carried out on energised electrical equipment except as the Regulations allow, and that duty sits with the business doing the work (r 153, r 154, r 157).	**LAW** s 19; no electrical work on energised equipment, r 154 [1, 2] **GOOD PRACTICE** the permit forms
Read the SWMS against the job	For high risk construction work, a safe work method statement before work starts (r 299), with a principal contractor, where there is one, taking all reasonable steps to get a copy first (r 312). Once there is one, the work must follow it: if it does not, it stops immediately, or as soon as it is safe to stop (r 300).	**LAW** r 299, r 300, r 312 [2]
Heights	Roof plant, risers, atria, and ceilings: any fall that is reasonably likely to cause injury managed, whatever the height.	**LAW** r 78 [2] **GOOD PRACTICE** the access permit

09 AUTHORISING AND CONTROLLING THE WORK

The hazards a government site adds.

Older buildings, public counters, and fit-outs bring risks a licence check will not find. These rows are prompts, not a technical manual: where work needs a specialist, name one as its owner.

Control	What it means on a government site	Status and source
After hours and alone	A cleaner or a technician alone in a building at night needs a system of work with effective communication, so help can be called (r 48), and the building's emergency plan. Decide who watches the check-ins, and what a missed one triggers.	LAW r 48, r 43[2] GOOD PRACTICE the check-in plan
Asbestos, before work that opens the building	Whoever manages or controls the workplace keeps the asbestos register readily accessible, and gives a copy to anyone whose work there risks exposure (r 425, r 427). A register is not permission to open a ceiling. Before refurbishing or demolishing a structure or plant from before 31 December 2003, other than minor or routine maintenance, the register is reviewed, revised if inadequate for the work (such as a void it lists as inaccessible), and given to the business doing it, which must get one (rr 447 to 450). Asbestos likely to be disturbed by a refurbishment is identified, and removed so far as is reasonably practicable, before it starts (r 456). After licensed removal, a clearance inspection before the area is used again (r 473).	LAW r 425, r 427, rr 447 to 450, r 456, r 473[2] GOOD PRACTICE stop work and isolate the area if suspect material turns up
Silica dust	Drilling, cutting, or grinding concrete, masonry, or other material with 1% or more crystalline silica, by power tool or mechanical plant, is processing it, by the test published in the Work Health and Safety Regulations 2011 (r 529A). It must be controlled: risks eliminated or minimised so far as is reasonably practicable, at least one effective wet, extraction, ventilation, enclosed-cabin, or isolation measure, and respiratory protection worn by anyone still exposed (r 529B, r 529C). The business doing it assesses, in writing, whether it is high risk; if so, a silica risk control plan, training, air monitoring, and health monitoring follow (rr 529CA to 529CE). Engineered stone benchtops, panels, and slabs are banned; removing, repairing, or disposing of installed stone needs controls and Comcare notified first (rr 529D to 529G). Comcare says the workplace exposure limits replace the exposure standards from 1 December 2026.	LAW rr 529A to 529G[2] REGULATOR Comcare, exposure limits[33]
Aggression and other psychosocial risks	Courts, service counters, security posts, and after-hours cleaning can expose contractors to aggression, harassment, or a traumatic event. These are psychosocial hazards, and each business manages them like any other risk, with regard to how the work is designed, staffed, and supported and to the interactions it involves (r 55A, r 55C, r 55D), working with the agency on a shared site (page 7). Our recommendation: agree separation from the public, a duress or assistance route, staffing, reporting, and support after an incident, ask the contractor's workers what they face, and do not rely on training alone.	LAW r 55A, r 55C, r 55D[2] GOOD PRACTICE the controls named
Laboratories, depots, and public areas	A laboratory released and decontaminated before trades enter; vehicles and people kept apart at a dock or depot; energy isolated and the isolation tested before plant work; chemicals stored and spills planned for, with their Safety Data Sheets; the public kept out by barriers; noise, dust, and waste controlled. Each is part of managing the risks of the work and workplace, so far as is reasonably practicable.	LAW ss 19 and 20(2)[1] GOOD PRACTICE the prompts

09 AUTHORISING AND CONTROLLING THE WORK

Control, continued	What it means on a government site	Status and source
Fire system isolation	Approved in advance, agreed with whoever controls the building, kept short, logged, and confirmed back in service by the fire contractor before the floor is occupied.	LAW an emergency plan for the workplace, r 43; and your state's building fire safety rules for the system itself [2] GOOD PRACTICE the isolation steps
Handback	The area inspected and cleared, services reinstated and tested, barriers removed, and the permit closed, before staff and visitors return.	LAW the workplace without risks so far as is reasonably practicable, s 20(2) [1] GOOD PRACTICE the signed handback

What one authorisation records.

One record per job, filled in by the people who know each answer. Each line names who fills it in, so nothing is assumed by the next person.

	Field	Filled in by
☐	The job, the site and area, the date and hours, and the contractor and each worker	Requester
☐	Licences, tickets, and induction checked for each worker, for this site (page 24)	Contract or facilities manager
☐	Any security access the area needs: the clearance level and status as agency security confirms it, or an escort, as a separate line	Agency security
☐	The risk assessment, and any SWMS, silica plan, permit, or isolation, by number	Contractor and permit issuer
☐	The asbestos register checked for this exact area, reviewed for the work if it opens the building, and a copy given if the work risks exposure	Whoever controls the building
☐	Handback: area checked, services reinstated, barriers removed, signed off, permit closed	Site or facilities manager

09 AUTHORISING AND CONTROLLING THE WORK

One job, four stages, controlled throughout.

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

1

Requested.

The job, the site, the contractor, and who is nearby.

Who: the requester.

Kept: the job, the area, the hours, each worker.

2

Assessed.

Risks, permits, any SWMS, security access, and the asbestos register.

Who: the contractor, the permit issuer, agency security.

Kept: the assessment and each permit, by number.

3

Authorised.

By whoever controls the area; the building told.

Who: the named authoriser, who then watches the work.

Kept: who authorised it, and when.

4

Handed back.

Checked, reinstated, signed off, record closed.

Who: the site or facilities manager.

Kept: the signed handback, permits closed.

Two rules for every contract.

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

Anyone can stop the work. Restart takes more.

A facilities manager, a security officer, or the contractor's own worker who sees work outside what was authorised can stop it. That adds to, and never limits, a worker's right to cease unsafe work (s 84) and a health and safety representative's power to direct it (s 85); where work has stopped that way, the business, the worker, or the representative may ask the regulator for an inspector (s 89). For high risk construction work not done to its SWMS, stopping is the law (r 300). Our rule: restart once the hazard is dealt with, the permit and any SWMS reviewed, and those affected consulted; disputes go to the agency's WHS lead first. [1, 2]

When the job changes.

A bigger job than the one authorised is a new job: assess it again and re-authorise it. A light fitting that becomes a switchboard change, or a ceiling repair that opens a void, changes the permits as well as the job, and may turn the work into refurbishment that needs the asbestos register reviewed first.

10 WHEN SOMETHING GOES WRONG

One event, more than one regulator.

A cleaner falls from a ladder on an agency floor, or a technician is burnt in a switch room shared with the building. Two businesses, under two different laws, may each have to tell their own regulator.

A notifiable incident is a death, a serious injury or illness, or a dangerous incident arising out of the conduct of the business or undertaking (sections 35 and 38(1)), whether the person hurt is a worker, a visitor, or a member of the public.[1]

	Immediately	Within 48 hours	At least 5 years
Commonwealth Act Comcare; sections 38 and 39[1]	**Notify Comcare.** Immediately after becoming aware of it, by the fastest possible means, by telephone or in writing. The person with management or control of the workplace ensures, so far as is reasonably practicable, that the site is not disturbed until an inspector arrives or directs otherwise.	**Written notice, if asked.** After a telephone notice, only if Comcare requires one: within 48 hours of that request, not of the incident.	**Keep a record.** For at least 5 years.
Victoria OHS Act 2004 (Vic) ss 38 and 39[5]	**Notify WorkSafe.** The employer or self-employed person with management and control of the workplace where the incident happened, immediately after becoming aware of it. The site is not disturbed until an inspector arrives or directs otherwise.	**Written record.** Given within 48 hours.	**Keep a copy.** For at least 5 years.

Under the Commonwealth Act, the site may still be disturbed to assist an injured person, remove a deceased person, take action that is essential to make the site safe or to minimise the risk of a further notifiable incident, for a police investigation, or with an inspector's or the regulator's permission (section 39(3)).[1] Other states and territories follow their own Act, and the 2025 model changes only where adopted (page 10):[31] the ACT, for example, adopted the mobile plant, serious fall, and site preservation changes from 19 November 2025.[30]

Agree who notifies, before anything happens.

Comcare says the agency's obligation is to have a process with its contractors, so it is told of any incident and it is agreed who will notify Comcare. The contractor may also have to notify its own state or territory regulator, and a barrier around the contractor's work area does not change whether Comcare must be told. "If in doubt notify the regulator."[7, 9] Each business with the duty stays responsible for it, whoever sends the notice.[1]



10 WHEN SOMETHING GOES WRONG

Put the route on one card for each site.

The incident card sits at reception, at the dock, and with security, and every contractor sees it at induction. It answers the questions people ask at 2 am, so nobody waits for a manager to be found. Fill in the right-hand column for each site, and review it with the site map.

On the card	What it says	This site
Emergency	000, the site's first aid and first aiders, the evacuation point, and anyone who needs help to evacuate	
Rescue for the task	For a confined space, work at height, or work alone, the rescue arrangement the permit names, and who runs it	
For responders	The street address, the entrance to use, who meets them, and how to reach a locked plant room or the roof	
Agency and building	The agency's site contact and the building manager, a backup for each, and their after-hours numbers	
Who decides on notifying	The person who decides whether Comcare or the state regulator must be told, their backup, and each contractor's own notifier	
Security and privacy	Who to tell when the same event is also a security incident or involves personal information	
The record	Incident number, the time the regulator was told and by whom, and its reference or acknowledgement	

Call first, approve later. A notifiable incident is reported to the regulator immediately after the business becomes aware of it, by the fastest possible means (section 38(1) and (2)).[1] Let no internal approval hold that call up: the card names who makes it, and the briefing follows. Our recommendation: test the card once a year, after hours, with a contractor.

11 A WORKED EXAMPLE

A refit on a leased floor.

A Commonwealth department refits two floors it leases in a Canberra office tower, a directly funded job with a head contract above AU$4 million. The builder, its electricians, the building owner's facilities provider, the department's cleaners and security, and an IT contractor all work there in the same month.

What is live	Why	What gets checked and kept
Two laws	The department is under the Commonwealth Act and Comcare (s 12(3)). The builder, its subcontractors, and the owner's facilities provider are likely to come under the Work Health and Safety Act 2011 (ACT), says Comcare. Both laws can apply to the floor (s 12(9)), and the department has to consult, co-operate, and co-ordinate with them (page 5). [1, 7]	The site map row naming each party's law and regulator; a dated record of each coordination meeting
The builder	A fit-out of existing Australian Government office accommodation, directly funded, with a head contract of at least AU$4 million: an accredited builder under the WHS Accreditation Scheme (page 13). [15] At AU$250,000 or more it is also a construction project. The department commissions it, so under the Commonwealth Regulations it is the principal contractor unless it engages the builder as one and authorises it to manage or control the workplace (r 292, r 293); [2] the builder then becomes it, likely under the ACT Regulation (Comcare), which uses AU$250,000 too (ACT ss 292, 293); Victoria's, by contrast, starts at AU$350,000. [28, 34]	Accreditation checked before the contract is signed; the principal contractor named in it, with the law each party holds its role under
The ceilings	The tower dates from 1988: Part 8.6 applies. For the department, which controls its floors (Commonwealth Regulations): the register reviewed, a copy to the builder first, and asbestos likely to be disturbed found and, so far as is reasonably practicable, removed (r 448, r 449, r 456); falls from the scissor lift managed (r 78). [2] For the builder and its electricians (ACT Regulation): the register obtained before starting (s 450), no work on energised equipment (s 154), and drilling the concrete slab controlled under the ACT's own silica rules (chapter 7A). [34]	Register reviewed, version given and date; isolation permits; the silica control; the lift operator's training
The comms room	The IT contractor works under escort, by the department's security terms (policy, page 14). [20] The WHS checks still apply: induction suited to the work (r 39), and any isolation. [2]	The escort log and the WHS induction on the same record
The cleaners, after hours	Comcare's own scenario for a cleaning contract: verify the chemicals the contractor will use and get the Safety Data Sheets, verify the cleaners' training, and verify how working alone after hours is managed. [7] Remote or isolated work needs a system of work with effective communication (r 48). [2]	Safety Data Sheets on file; the check-in plan; who answers a missed check-in

11 A WORKED EXAMPLE

The same month, on paper and joined up.

Four moments from the table, on paper and joined up. Joined up, on Friday the executive sees who worked where, what each held, which checks were done on site, and what is still open.

	The builder	The ceiling	The comms room	The cleaners
On paper	Accreditation is assumed from last year's job, and nobody records who the principal contractor is.	The electrician opens a ceiling before anyone has looked at the register.	Security has the escort log; WHS never sees whether the contractor was inducted.	A cleaner works alone until midnight, and nobody is watching for a check-in.
Joined up	Accreditation and the principal contractor are recorded before the contract is signed.	The register is reviewed for the refit, and asbestos the work could disturb is found and, so far as is reasonably practicable, removed before the permit is issued.	The escort and the induction are linked to the same worker's record.	Check-ins go to security, and a missed one is followed up within the agreed time.



12 THE RECORD

What to hold for every contractor.

Unless another law is named, numbers are the Commonwealth Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 10).

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

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

Level	What to hold	Status and source
The company	The evidence that it has the expertise it claims, its own systems for working safely, and that it follows them	**REGULATOR** Comcare [7]
	The procurement record: the evaluation, including the tenderer's workplace health and safety practices and performance history, and the documentation and decision trail, kept to the procurement's scale, scope, and risk and retained under the Archives Act	**LAW** for Commonwealth officials, Procurement Rules paras 4.5, 6.6, 7.2, and 7.5 (a legislative instrument), page 12 [12] **GOOD PRACTICE** one way to organise it: linked to the safety record
	The Supplier Code of Conduct in the contract, and any declaration asked for	**LAW** for relevant entities, Procurement Rules para 6.13 [12] **POLICY** the Code's terms, through the contract [13]
	Workers compensation: the contractor's own statutory cover as an employer under its state or territory scheme, or its self-insurance or a documented exemption where one applies. In the ACT, for example, an employer that is not a self-insurer must keep a licensed insurer's policy (Workers Compensation Act 1951 (ACT) s 147A). Our view: the scheme it is insured under does not decide which WHS law applies (page 5)	**LAW** the employer's duty under its scheme, such as ACT s 147A [32] **GOOD PRACTICE** the certificate of currency, and its date
	Public liability and any other cover the contract asks for, with expiry dates	**POLICY** the contract's insurance terms **GOOD PRACTICE** the certificates and expiry dates
	For Commonwealth-funded building work at or above the thresholds: the builder's accreditation	**LAW** Federal Safety Commissioner Act 2022 s 43; Rules r 26; page 13 [14]
The worker	Written evidence of any high risk work licence, sighted before the work, and a record kept for at least 1 year after the high risk work is carried out; its class, scope, conditions, and current status checked; reviewed again on a suspension, an incident, or a change of scope, and a renewal reviewed, not approved on arrival	**LAW** r 85(1) and (4) [2] **GOOD PRACTICE** the status check
	General construction induction training for construction work (and, if it was completed more than 2 years ago, construction work in the past 2 years), and any licence your state requires for the trade itself, such as an electrical licence	**LAW** r 317; [2] your state's licensing law

12 THE RECORD, CONTINUED

The worker's clearance, the site, and the visit.

Unless another law is named, numbers are the Commonwealth Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 10).

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

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

Level	What to hold	Status and source
The worker, continued	A security clearance at the level the role needs, where it needs ongoing access to classified information, with its status and sponsorship confirmed by agency security, not read from an expiry date, and access only with a need-to-know; security awareness training at engagement and each year	POLICY PSPF Requirements 0131, 0132, 0146, 0024; Table 26[20] GOOD PRACTICE who confirmed it, and when
The site	A site induction, including emergency procedures and hazards, before they start	LAW training suited to the work and its risks, r 39[2] GOOD PRACTICE the induction form
	The asbestos register accessible, and a copy given where the work risks exposure; before older structures or plant are refurbished, the register reviewed for the work and given to the business doing it (page 17)	LAW r 425, r 427, r 448, r 449[2]
	A safe work method statement for high risk construction work, and permits: confined space entry in writing; the rest by the agency's or the building's own	LAW page 16 GOOD PRACTICE other permits
	Which law and regulator applies to the agency, the building owner, and each contractor (page 5)	LAW the Commonwealth Act, page 5[1] GOOD PRACTICE the site map
The visit	Sign in and out, by site, so you know who is on site and when	REGULATOR Comcare: a contractor register and induction process "to know who is onsite when"[7]
	Consultation with the other duty holders, under both laws where both apply, and with affected workers and their representatives	LAW s 46, s 47, s 48(2); across two laws, page 5[1]
	The handback: isolations reinstated, area cleared and inspected, signed off	LAW page 18 GOOD PRACTICE the signed record

Keep it, and keep it linked. How long each record is kept, who keeps it, and who may see it are on page 15.

12 CHECKLIST

Before a contractor starts.

Unless another law is named, numbers are the Commonwealth Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 10).

	Check	Owner	Date and evidence ref.
	Know who holds the duty, under which law		
☐	We know which law and regulator apply to us, to the building owner, and to each contractor at each site. **Law, page 5** **Good practice** the agency site map, page 29		
☐	We know who has management or control of each part of each building: the agency, the owner, or a facilities provider. **Good practice** the agency site map		
☐	For each construction project, we know who the principal contractor is, in writing, and for Commonwealth-funded building work at or above the thresholds, that the builder is accredited. **Law, r 293 (who it is); FSC Act s 43 (accreditation)** **Good practice (in writing)** page 13		
	Across the agency, standing		
☐	Officers receive a regular report that verifies the checks happen, not only that the policy exists: overdue actions, and a sample of permits and records checked against the work done. **Good practice; taking reasonable steps to verify is part of an officer's due diligence, s 27(5)(f)** the report, dated		
☐	Every action raised by these checks has an owner and a due date, and is closed only when someone has seen that it was done. **Good practice** the action, its owner, and the evidence it closed		
	At tender, quote, or panel		
☐	The request names the licences, tickets, clearances, and site rules the work needs. **Good practice** the specification		
☐	The evaluation looked at the tenderer's workplace health and safety practices and its performance history. **Law for Commonwealth officials, Procurement Rules paras 4.5 and 6.6** the evaluation, dated		
☐	The contractor's statutory workers compensation cover, or its self-insurance or exemption, is on file, and so is the public liability and other cover the contract asks for, with dates. **Law, the employer's scheme, page 24** **Policy** the contract's insurance terms **Good practice** certificates and dates		
☐	The contract carries the Supplier Code of Conduct, any security terms, the privacy clauses, and says who checks each worker, who authorises the work, and who notifies after an incident. **Law, Procurement Rules para 6.13 (the Code) and Privacy Act s 95B** **Policy, PSPF 0040 (security terms)** **Good practice** the other clauses		

12 CHECKLIST, CONTINUED

Before the first visit, and on the day.

Unless another law is named, numbers are the Commonwealth Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 10).

	Check	Owner	Date and evidence ref.
	Before the first site visit		
☐	Each worker's licences and tickets for the work are on file, with class, scope, conditions, and current status, and reviewed again on a suspension, an incident, or a change of scope. **Law, page 24 (high risk work licences)** **Good practice** the other tickets, the reviews, and documents against each worker		
☐	Each worker has completed this site's induction, including emergency procedures and hazards. **Law, page 25 (training suited to the work)** **Good practice** induction completion, per person		
☐	Agency security has confirmed that each worker who needs ongoing access to classified information holds a clearance at the right level, that it is current and sponsored, and that the worker has a need-to-know for this area, recorded separately from the WHS checks. **Policy, PSPF 0131, 0132, 0146** the status, who confirmed it, and when; not the vetting file		
☐	The asbestos register has been seen, covers the area of the job, and a copy was given where the work risks exposure. Before refurbishing older structures or plant, it was reviewed, and asbestos likely to be disturbed found and, so far as is reasonably practicable, removed. **Law, page 17** register version, review date, and date given		
	On the day, at any site		
☐	The visit was expected, and the site, and the building where it is not ours, could see it. **Good practice** the booking		
☐	Every worker signed in and out, and any escort was recorded against the same worker. **Regulator, Comcare** **Good practice** sign-in by site		
☐	Any high risk work licence was sighted before the work, not after. **Law, page 24** licence number, class, scope, conditions, current status		
☐	A worker alone after hours has a way to call for help that works in that building, someone watches the check-ins, and a missed one is escalated. **Law, page 17 (a system of work with effective communication, and an emergency plan)** **Good practice** the check-in plan		

12 CHECKLIST, CONTINUED

The work, the handback, and after.

Unless another law is named, numbers are the Commonwealth Act's and Regulations'; your state's may differ, and in Victoria read its own OHS Act and Regulations (page 10).

	Check	Owner	Date and evidence ref.
	Before the work starts		
☐	The task was assessed for this site today, including the staff, visitors, and other contractors nearby. **Law, page 16** **Good practice** the written assessment		
☐	A safe work method statement for high risk construction work was read against the job. **Law, page 16** the statement, version and date		
☐	Permits were issued: confined space entry in writing, after the assessment, isolation, standby, and rescue plan; hot work, roof access, and isolations by our own permit or the building's. **Law, page 16** **Good practice, other permits** permit numbers		
☐	Cleaning chemicals were checked against their Safety Data Sheets, and the cleaners' training for them was confirmed. **Regulator, Comcare** the SDS on file		
☐	Any drilling, cutting, or grinding of concrete or masonry has its dust controls in place, and any high risk processing its plan. **Law, page 17 (silica)** the control used, the plan or SWMS		
☐	Psychosocial risks for contractors at a public counter, a court, or a security post, or cleaning after hours, are assessed and controlled, for example with separation, a duress or assistance route, and a way to report. **Law, page 17 (psychosocial risks)** **Good practice** the controls agreed, an owner, a date checked		
	Handback, and if something goes wrong		
☐	Isolations reinstated, the area cleared and inspected, barriers removed, and the handback signed before staff and visitors return. **Law, page 18** **Good practice** the handback, signed		
☐	Work that was stopped, by anyone, restarted only after the hazard was dealt with, the permit and any SWMS reviewed, and those affected consulted. **Good practice, page 19 (our rule)** who agreed the restart, and when		
☐	The site's incident card is current: emergency help, access for responders, contacts with backups, who decides on notifying Comcare or the state regulator, and who preserves the site; the contractor has seen it. **Law, page 20** **Regulator, Comcare** **Good practice** the card, page 21, reviewed		

12 TEMPLATE

The agency site map.

One row per site; the first row is an example. It settles, before the job starts, which law applies to whom, who may work where, what they must hold to work there, and who has to know.

Site	Which law, which regulator	Who controls it	Who authorises work	Security access	Asbestos register	After hours, and who notifies
Example: two leased floors, office tower, Canberra	*Agency: Commonwealth Act, Comcare. Owner, facilities provider, and contractors: ACT law, WorkSafe ACT*	*Agency for its floors; the owner's facilities provider for the dock, risers, and roof plant*	*Agency property officer; facilities provider for base building work*	*Escort in the comms room; agency pass at the floor doors*	*Built 1988; the owner's register, a copy at the dock office; reviewed for the refit*	*Cleaners 6pm to 11pm, check-ins to security. Agency WHS lead notifies Comcare; the builder notifies WorkSafe ACT. Reviewed 01/11/2026*

How to keep the map true.

A map nobody keeps current is worse than none, because the door trusts it. Three habits keep it right: agree each row, review it when anything changes, and keep it where the door can see it.

Fill it in together.

Property, security, WHS, and procurement should agree each row, with the building owner where you lease. Where they disagree, there is a gap in who does what, and the duty does not wait for it to close.

Review it on any change.

A new lease, a new facilities contract, a fit-out, or a change of security zone changes the row. Give each row a review date and any current restrictions, and keep the site's incident card (page 21) with it.

Keep it with the record.

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

13 ONE STANDARD ACROSS THE ESTATE

The same standard at every door.

Everything in this guide needs to work in every building the agency runs or leases, from head office to a regional shopfront, staffed or not.



Questions to ask about how you manage it today.

1. If an auditor asked which contractors worked in one building last quarter, and what each held on the day, how long would the answer take?
2. How many contractor lists does the agency keep: one per division, one for security, one for procurement, or one for all?
3. When a licence or an insurance certificate lapses, or agency security flags a clearance, who finds out, and before or after the next visit?
4. For each leased building, do you know who controls the dock, the risers, and the roof, and under which law?
5. Before a ceiling is opened in an older building, is the asbestos register reviewed for that work, and does the electrician see it?
6. Who authorises work in the comms room, and is the escort recorded against the same worker as the induction?
7. Have you agreed with each contractor who notifies Comcare, or the state regulator, and is it on a card at each site?
8. How many hours a month go on chasing certificates and typing them into spreadsheets?

What to look for in a system.

Seven capabilities that keep the checks in this guide working at every site, staffed or not.

- **One standard across the estate.** One requirement set for every department, agency, or estate, with each site's own requirements on top.
- **Register once.** Each company and worker registers once and uploads what the role needs, such as insurance, licences, and the Supplier Code declaration.
- **Expiry tracked for you.** Reminders before anything lapses, and re-approval requests sent on their own.
- **Clearance status beside WHS status.** The clearance status agency security confirms, recorded beside the licences, while the vetting itself stays with the agency.
- **A door that checks.** Sign-in by QR code or tablet at reception, the dock, or a secure door, read against the record.
- **Permits on the same record.** Heights, hot work, and escorted-access permits routed to a named authoriser, with the method statement read before approval.
- **A report for the executive and the auditor.** Scheduled reports across every department, agency, or estate, and one export for Comcare or an auditor.

START SMALL

Start with one leased building.

Take one building you lease and share, fill in its row of the site map on page 29, and run the checklist on pages 26 to 28 against its contractors. Close the gaps it shows first, and ask anyone offering a system to show each point above in your own buildings.

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

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