COMPLYFLOW



CONTRACTOR COMPLIANCE GUIDES

Utilities: the contractor compliance guide.

What Australian law asks of utilities when contractors work on their networks, and how to prove you met it.

Current to November 2026
Model WHS laws as at 5 December 2025; the Security of Critical Infrastructure Act as at 4 June 2026 and its risk management program Rules as at 10 June 2026; sources read between 5 and 16 November 2026

Includes
A checklist, a worked example, a network access map, and an incident card

Covers
Electricity, gas, water and wastewater, and telecommunications networks, in every state and territory, Victoria named

START HERE

The short version.

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

Most work on a network is done by other businesses. The line crew, the civil contractor, the traffic controller, and the cleaner at the treatment plant all work under your duty.

1 **The utility is the business, and contractors' workers are its workers too.** A worker includes a contractor and a contractor's employee, and the duty reaches workers the business engages or directs (page 5).[1]

2 **Electrical work is done dead, unless a listed reason says otherwise.** Under the model Regulations, live work needs a listed reason, a risk assessment, a safe work method statement, and, in most cases, a safety observer. Those live work rules do not cover supply-authority work: in the model, work by or for an electricity supply authority on the equipment it controls or operates to transform, transmit, or supply electricity is governed by your state's electrical safety law and the operator's own system, alongside the general WHS duties, and a state may omit or change that carve-out (r 152; pages 11 to 13).[2]

3 **Before anyone digs, get the services information, pass it on, and find the services on the ground.** Whoever manages or controls the workplace must take all reasonable steps to get current underground services information before digging starts, and give it to the contractor doing the digging. Plans are indicative only, so our recommendation is to locate the services on site before the dig (page 15).[2, 22]

4 **A critical electricity, gas, or water asset, or a carrier's or larger carriage service provider's critical telecommunications asset, needs a risk program that covers contractors.** Its responsible entity must identify its critical workers, contractors included, and let them reach critical components only once they are assessed as suitable; for electricity, gas, and water, the enhanced rules add a recorded exception for a worker who cannot meet the assessment (pages 19 and 20).[9, 10, 20]

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

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01 THE PRACTICAL TEST

The practical test is what you can show.

A utility approves a contractor once, for a panel or a contract. Its people then work at substations, pump stations, and pits the panel never sees. The question a regulator asks: who was on the network, and what did they hold on the day?



An approved contractor is not a ready worker.

Most checks stop at the company. The law reaches further. A contractor's employees who carry out work for the utility 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 line contractor on the panel since 2023 says little about whether the crane operator it sends tonight holds the right licence class.

ASSESSED BEFORE ENGAGEMENT; REVIEWED ON ANY CHANGE

The company

- ✓ Assessed for the panel or contract, its safety record included; again on a change of scope, an incident, or a lapse
- ✓ Its contractor licence where the state requires one (page 12), and any network accreditation, apart from its workers' licences
- ✓ Its workers compensation and public liability cover, and their dates (page 22)

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

Each worker, at each site

Substation | Pump station | Road verge

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

Where it usually breaks.

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

A list per contract.
The maintenance contract, the capital program, and the facilities contract each keep their own copy of the same contractor's certificates.

Checked by hand.
Someone types each licence's expiry into a spreadsheet. It holds until a storm brings every depot's callout crews in one night.

Sites with nobody there.
A zone substation, a reservoir, or a telecommunications hut has no front desk. A book at the depot answers nothing about who was at it.

No view across the network.
Nobody can say who is current across every depot, or who worked on last Saturday's outage.

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



02 THE DUTY HOLDERS

The utility is the business.

Work health and safety law puts its main duty on a "person conducting a business or undertaking", a PCBU, whether or not it is conducted for profit or gain. A distributor, a water corporation, a gas network, and a council running a water business are each one.[1] The duty reaches the treatment plant cleaner as surely as the line crew.

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

02 THE DUTY HOLDERS

Who the utility owes the duty to.

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

Contractors are workers.

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

Engaged or directed is enough.

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

Each site carries its own duty.

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

Who is on a utility network.

The utility sits at the top. Everyone below it brings people onto the network, and each needs a place in your checks.

The utility
The PCBU: an electricity distributor or transmission business, a gas distributor, a water and sewerage business, or a telecommunications carrier

Network operations and field services
Parts of the business, not separate ones: each engages and directs its own contractors

The chief executive and the executive
Officers: the board, the chief executive, and others who meet the officer tests (page 7); the role decides, not the title

Other duty holders on site
A principal contractor on a project, another utility whose assets share the street, and the road authority

Contractors
Line and cable crews, electricians, plumbers and pipelayers, civil and trenching crews, traffic control, vegetation crews, cleaners, security, and pest control

Subcontractors and labour hire
The contractors' own subcontractors, agency staff, and apprentices

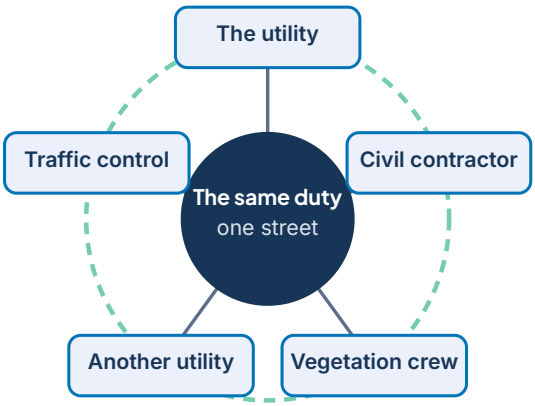
Accredited and alliance partners
Businesses accredited to build or connect to the network, and partners running parts of it under long contracts

A storm is not an exception. A callout crew brought in overnight from another depot, or another state, is a worker of the business that engages or directs it, like any other. Our recommendation: check callout crews against the same record, at sign-in, before they reach the network.

02 SHARED DUTIES

Shared, but never handed over.

A cable replacement under a suburban street puts the utility, the civil contractor, the traffic control company, the vegetation crew, and another utility's assets in one trench. Four rules apply to every one of them.



Consult, cooperate, and coordinate

1. **Held at once, each to its own control.** "More than 1 person can concurrently have the same duty" (section 16(1)). Each keeps responsibility for its own duty and must discharge it to the extent of its capacity to influence and control the matter, or the capacity it would have had but for an agreement or arrangement that tries to limit or remove it (section 16(3)).[1]

2. **Worked together.** Each "must, so far as is reasonably practicable, consult, co-operate and co-ordinate activities with all other persons who have a duty in relation to the same matter" (section 46).[1]

3. **Workers consulted too.** So far as is reasonably practicable, each consults the workers who carry out work for it, contractors' workers included, who are, or are likely to be, directly affected by a health and safety matter, and involves their health and safety representative where they have one (sections 47 and 48(2)).[1] A meeting between businesses does not meet it.

4. **Never transferred.** "A duty cannot be transferred to another person" (section 14). A contract term that tries to exclude, limit, or modify a duty, or transfer it, is void (section 272).[1]

> **"WHS duties cannot be contracted out to another party, such as a subcontractor."**
> Safe Work Australia, WHS duties in a contractual chain, March 2022[13]

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 job (page 9).[4]

03 OFFICERS

Due diligence is personal.

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

Who is an officer.

Is the utility a company, a government business, a public authority, or a council?

A company director or secretary is an officer, and so is anyone who makes, or participates in making, decisions that affect the whole, or a substantial part, of the business, who can significantly affect its financial standing, or whose instructions the directors usually follow (section 4, taking the Corporations Act meaning). For the Crown and for a public authority, an officer is a person "who makes, or participates in making, decisions that affect the whole, or a substantial part" of its business or undertaking (sections 247 and 252); a Minister is not one. What counts as a public authority is for your jurisdiction's Act.[1, 16]

Then

Name the officers by what they decide.

At a utility, that can include the chief executive, the board, and the executive who run network operations, field services, and capital works: the role decides, not the title.

What an officer risks.

Under the model Act, a Category 1 offence, the most serious of the three categories of health and safety duty offence, carries a fine, up to 10 years in prison, or both, for an officer (section 31). Each jurisdiction sets its own penalties: check yours.[1] It is not the ceiling: the model Act leaves room for an industrial manslaughter offence, and Victoria and WA are two that have one (below, and page 9).[1, 4, 14]

In Victoria.

The OHS Act 2004 (Vic) takes "officer" from section 9 of the Corporations Act (s 5(1)). An officer commits an offence where the body's contravention is attributable to the officer's failure to take reasonable care (s 144), and the workplace manslaughter offence also reaches officers (s 39G).[4]



03 OFFICERS

Due diligence includes taking reasonable steps to:

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

a

Know.

Acquire and keep up to date knowledge of WHS matters.

At a utility: a briefing when the state changes its electrical safety or notification rules.

b

Understand.

The operations, and their hazards and risks.

At a utility: knowing which sites have nobody there, where crews work near live lines, and which pits and wet wells are confined spaces.

c

Resource.

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

At a utility: one funded contractor process, used by every depot and region, storm callouts included.

d

Hear and respond.

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

At a utility: contractor incidents and asset strikes reported to the same place as staff ones, near misses included.

e

Comply.

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

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

f

Verify.

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

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

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

What the executive can ask for.

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

Contractors engaged this quarter, by depot and contract, and how many were checked before their first shift, storm callouts included.

Electrical licences, network accreditations, and tickets due to lapse in the next 30 days, and any whose status changed (suspended, cancelled, or conditions added), by contractor.

Live electrical work and confined space entries authorised, how many were checked on site, and a sample of permits and SWMS compared with the work done.

Incidents and asset strikes, which regulator was told, and the corrective actions still open past their due date.

04 WHERE THE LAWS DIFFER

One set of model laws, and a second layer.

Safe Work Australia says: "Victoria is the only jurisdiction who has not implemented the model WHS laws." Some others have made substantial variations.[3] A utility also answers to its state's electrical, gas, or water safety law, which sits beside the WHS law.

Law	What it says	What it means for a utility
Victoria	Occupational Health and Safety Act 2004 (Vic). An employer's duties extend to independent contractors it engages, and their employees, "in relation to matters over which the employer has control or would have control if not for any agreement purporting to limit or remove that control" (s 21(3)(b)), and it must ensure, so far as is reasonably practicable, that people other than its employees are not exposed to risks from its undertaking (s 23). Whoever has the management or control of a workplace must ensure, so far as is reasonably practicable, that it and the means of entering and leaving it are safe and without risks to health, for matters it manages or controls (s 26).[4]	Victoria's own electrical, gas, and drinking water safety laws also apply. This edition does not summarise them: read them for your network.
Queensland	The WHS Act and Regulations, plus the Electrical Safety Act 2002 (Qld). An electricity entity must ensure its works are electrically safe and operated in a way that is electrically safe, including inspecting, testing, and maintaining them (s 29), and every business must be conducted in a way that is electrically safe (s 30).[5]	Electrical work is licensed, and a business that engages others to do it keeps a register of licensed workers (page 12). A prescribed electricity entity has a safety management system that covers its contractors.[5] Queensland's WHS Regulation does not use the model's electrical rules: its Part 4.7, sections 145 to 166, is "not used". Queensland's electrical safety duties are in the Electrical Safety Act 2002 (ss 29 and 30, above) and the regulation made under it, which this edition does not summarise.[5, 19]
South Australia	The WHS Act and Regulations, plus the Electricity Act 1996 (SA). Anyone who owns or operates electricity infrastructure must take reasonable steps to ensure it meets the technical and safety requirements under the regulations, and is safe and safely operated (s 60(1)).[6]	A network licence carries a safety, reliability, maintenance, and technical management plan, approved by the Technical Regulator and audited (s 23).[6]
Western Australia	Work Health and Safety Act 2020 (WA). It binds the Crown (s 10), and has its own industrial manslaughter offence (s 30A).[14]	Its own electrical and network safety laws also apply; this edition does not summarise them.
Every other state and territory	Each jurisdiction's own version of the model WHS Act and Regulations.[3] In NSW, SafeWork NSW says the Work Health and Safety Regulation 2025 (NSW) commenced on 22 August 2025, and that its provisions are now called sections.[15]	The duties are broadly alike, but text and numbering can differ, and each has its own electrical licensing and network safety law: check yours.
The Commonwealth	The Security of Critical Infrastructure Act 2018 (Cth) applies across every state to the critical assets its Rules specify, telecommunications included (page 19).[9, 10, 20]	It adds a risk program; it does not replace the WHS duty.

Unless another law is named, section and rule numbers in this guide are the model WHS Act's and Regulations'. Your state's numbers may differ, and Victoria's is a different Act.[1, 2]



05 ELECTRICAL WORK

Electrical work is done dead, unless the law says otherwise.

The model Regulations start from one rule: no electrical work on energised equipment. That rule does not cover the network itself: work by or for an electricity supply authority on the equipment it controls or operates to transform, transmit, or supply electricity is governed by your state's electrical safety law and the operator's own system, alongside the general WHS duties, and a state may omit or change that carve-out (r 152; page 12).[2]

> **A business "must ensure that electrical work is not carried out on electrical equipment while the equipment is energised".**
>
> Model Work Health and Safety Regulations, regulation 154 (not network work by an electricity supply authority: see above)[2]

05 ELECTRICAL WORK

Supply-authority work and network controls.

In the model Regulations, work by or for an electricity supply authority on the equipment it controls or operates to transform, transmit, or supply electricity is outside the live work rules (r 152); a state may omit or change that carve-out. Other electrical work is not exempt just because it is on a network: page 13 applies to it. These checks carry both, and non-electrical work: who isolated what, who is fit tonight, and how the asset returns to service.[2]

Control	What it means on a network	Status and source
Permits and isolations	Switching, access, isolation, confined space, and gas work run under a permit, each with a named person who issues and closes it. Our recommendation: an isolation is issued only by whoever has authority over that system, such as network operations for a line or the utility for its own main. The permit names the systems affected, how each is locked or controlled, how the safe state is proved before work, stored pressure or charge included, and who approves reinstatement; where more than one owner is involved, the permits are linked.	**LAW** the primary duty, s 19[1] **GOOD PRACTICE** the permit forms, the isolation authority, and linked permits
Network authorisation	Each worker's authorisation to work on or near the network under the operator's own system (page 12), checked for the task, and held apart from the electrical licence.	**LAW** the operator's system where your state requires one, such as Qld s 67 or SA s 23 (page 12)[5, 6] **GOOD PRACTICE** the check at sign-in
Fit for this shift	A current licence says nothing about tonight. On a storm callout or a long outage, check before the shift each worker's recent hours, including work for other employers, their rest and travel, and the breaks and relief planned, with a plan for an overrun. Give workers a way to report fatigue without pressure to carry on.	**LAW** the primary duty, s 19[1] **GOOD PRACTICE** the pre-shift check
Handback and return to service	Required inspections and tests complete; people and equipment accounted for; isolations removed or transferred only under the authorised procedure, any that stay recorded with who controls them; the required acceptance given before return to service. Closing the permit does not by itself make the asset safe to energise or pressurise. The record shows the tests, open defects, any limit still in force, who accepts the asset back, and who can refuse it. On a drinking water asset, the return to service follows the supplier's plan (page 18).	**LAW** the workplace without risks so far as is reasonably practicable, s 20(2);[1] in Queensland, comply with the plan, s 93[11] **GOOD PRACTICE** the signed handback, accepted
When the check cannot be done	No signal, a stale record, or a status that cannot be confirmed: confirm identity and the evidence another way, such as a call to the control room, which holds the record. For high risk work, a call does not replace the licence check: the business must still see written evidence of the licence before the work starts (r 85). Record the decision and who made it. Where required evidence or controls cannot be confirmed, safety-critical work does not start, and the record is put right afterwards.	**LAW** r 85[2] **GOOD PRACTICE** the fallback route

Near the work, not on it. Construction work on or near energised electrical installations or services is high risk construction work, which needs a safe work method statement before it starts (r 291(k), r 299).[2] That reaches the civil crew working near the line, not only the electrician; other crews, such as vegetation crews, are caught where their work is construction work as r 289 defines it.

05 ELECTRICAL WORK

Who may do it: the state's licences.

The model WHS Regulations do not license electricians. Each state does, in its own law. Queensland's shows what a utility has to check at two levels, the contracting business and each worker.[2, 5] Its Electrical Safety Regulation 2026 commenced on 1 September 2026, replacing the 2013 Regulation; this edition does not summarise it.[21]

The contracting business.

A business that includes performing electrical work must hold an electrical contractor licence in force (s 56(1)); maximum penalty 400 penalty units. The Act lists exceptions. The one that matters most here: a business that contracts for work but intends to subcontract the electrical work to an electrical contractor whose licence authorises it (s 56(3)(b)). The licence is not a network accreditation.[5]

The worker.

Nobody may perform or supervise electrical work unless they hold an electrical work licence that authorises it (s 55(1)); maximum penalty 400 penalty units. Installing or repairing telecommunications cabling is one listed exception (s 55(3)(a)); customer cabling has its own registration rules (page 13).[5]

Who does the work.

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

The register.

A business that engages others to do or supervise electrical work keeps a register of licensed workers, shows it to an inspector immediately on request, updates it within 7 days of being told of a change, and keeps each entry for at least 5 years after the person stops being engaged (s 57AB).[5]

The network operator's own system.

Electrical safety law puts a second layer on the network operator itself. Two examples show it reaching contractors. Our reading: where the operator's system sets rules for contractors, such as an authorisation to work on the network, it is part of what you check at the gate, held apart from each worker's licence and the business's.

Queensland.

A prescribed electricity entity must have, and give effect to, a safety management system (s 67). It is a written document devised in consultation with worker representatives and with its principal or primary contractors, and it details what the entity will do to ensure its contractors comply with it (s 66).[5]

South Australia.

A transmission or distribution licence requires a safety, reliability, maintenance, and technical management plan, approved by the Technical Regulator, complied with, and audited, with the results reported to the Technical Regulator (s 23). An exempt operator can be required to do the same by written notice (s 60B).[6]

05 ELECTRICAL WORK

Other electrical work: the live work rules, step by step.

Outside supply-authority work (page 11), the model's live work rules apply wherever electrical work is done, pump stations and telecommunications huts included. Electrical work is defined widely, from connecting supply wiring to testing, repairing, or maintaining equipment; plugging into a socket is not (r 146). Queensland is on its own path (page 9).[2]

1

Test first.

A competent person tests whether the equipment is energised before work starts.

r 155(1)[2]

2

Work dead, and keep it dead.

No electrical work on energised equipment, and equipment de-energised for the work is not inadvertently re-energised while it goes on.

rr 154, 156[2]

3

Live only for a listed reason.

It is necessary in the interests of health and safety, necessary for the work to be done properly, necessary for the testing, or there is no reasonable alternative.

r 157(1)[2]

4

Prepare before live work.

A recorded risk assessment by a competent person; the area clear for access and exit; the isolation point marked, clear, and quick to operate; the work authorised after consulting whoever manages or controls the workplace.

r 158[2]

5

Control the live work.

Only authorised people in the area; nobody able to touch an exposed live part by accident; a competent person with suitable, tested tools and PPE; its own SWMS; and a safety observer competent to act in an emergency and to rescue and resuscitate, assessed in the previous 12 months as competent to rescue and resuscitate. Testing-only work the risk assessment shows has no serious risk needs no observer.

rr 159, 160, 161[2]

6

Keep the records.

The risk assessment until at least 28 days after the work is completed, the SWMS until it is completed, and both for at least 2 years after a notifiable incident connected with it, readily accessible to the workers. This SWMS is required for the live work in its own right, whether or not the job also needs a construction SWMS (page 11).

r 162[2]

Telecommunications cabling: a different credential.

Queensland's licence exception for telecommunications cabling is not permission for anyone to do it: customer cabling has its own national rules, set by the ACMA. Work on a carrier's own network is a separate question.[5, 23]

Customer cabling.

Done by a registered cabling provider whose registration covers the work, or by someone one directly supervises at all times and takes full responsibility for (s 21), to the Wiring Rules (s 23). On completion, the cabler gives the employer and the customer a statement that it complies, and keeps a copy for at least 1 year; small tasks such as jumpering are excepted (s 25).[23]

Carrier network work.

Our recommendation: check what the carrier's own system requires for work on its network, as a separate line from customer cabling registration, and do not record any cabling task as exempt by default. Damage to a carrier's facility has its own rule (page 16).



06 LINES AND SERVICES

Lines overhead, services underground.

Most network work happens near someone's asset: a power line over the vegetation crew, a gas main beside the water main, a telecommunications cable in the trench. Two model rules set the duty before anyone starts.[2]

> **A business must ensure, so far as is reasonably practicable, that no "person, plant or thing at the workplace comes within an unsafe distance of an overhead or underground electric line".**
>
> Model Work Health and Safety Regulations, regulation 166(1)[2]

06 LINES AND SERVICES

Electric lines: keep the distance, or assess it.

A business must ensure, so far as is reasonably practicable, that no person, plant, or thing comes within an unsafe distance of an overhead or underground electric line. Where that is not reasonably practicable, it assesses the risk, and its controls follow the assessment and any requirements of the electricity supply authority responsible for the line (r 166).[2] A note to the rule says the state's electricity safety law also applies. The model rule does not define an unsafe distance: read your state's electrical safety law and the authority's requirements for the line.

Before the dig: get it, pass it on, keep it, find it.

Rule 304 sets the first three steps for whoever manages or controls the workplace. "Essential services" covers gas, water, sewerage, telecommunications, electricity, and similar services, and chemicals, fuel, and refrigerant in pipes or lines (r 5).[2] The fourth step is ours: a plan is not the ground.

1

Get it.

Take all reasonable steps to obtain current underground essential services information for the dig and the areas next to it, before directing or allowing the digging to start: which services may be affected, where their pipes and cables are, including depth, and any conditions on the work.

r 304(1), (2), (7)[2]

2

Pass it on.

Give it to any business engaged to do the digging. Both must have regard to it in carrying out or directing the work.

r 304(3), (4)[2]

3

Keep it.

Keep it available until the digging is finished, or for at least 2 years after a notifiable incident connected with it.

r 304(6)[2]

4

Find it on the ground.

Our recommendation: locate the services on site by competent locating and safe exposure, as each asset owner requires; resolve any mismatch with the plans; protect what is exposed; allow for private and unrecorded services; and keep an owner contact for urgent work.

Good practice; plans are indicative only[22]

Where the information comes from.

Before You Dig Australia describes itself as a single point of contact to request information about underground or overhead infrastructure at a planned work site, with free plans, and relevant asset owners are notified of the proposed works.[7] It is a service, not the law: the duty is rule 304. Its own answers say the plans are indicative only, not every asset owner is a member, and receiving every response is not approval to dig.[22]

06 LINES AND SERVICES

Three more rules near services.

Each card is one kind of asset a dig often meets, and the rule that applies to it.

Trenches.

For a trench at least 1.5 metres deep, the area is secured from unauthorised access so far as is reasonably practicable, and every side is supported by shoring, benching, or battering, unless a geotechnical engineer advises in writing that all sides are safe from collapse (r 306(1), (3), (4)). Construction work in or near a trench deeper than 1.5 metres is high risk construction work (r 291(g)).[2]

Gas and fuel lines.

Construction work on or near pressurised gas distribution mains or piping, or chemical, fuel, or refrigerant lines, is high risk construction work, and needs a safe work method statement (r 291(i), (j), r 299).[2]

Telecommunications.

Tampering or interfering with a facility owned or operated by a carrier or carriage service provider is a Commonwealth offence (Criminal Code s 474.6).[8] Separately, our recommendation: report any damage to a telecommunications asset to the carrier at once.

What the pipe or the ground may contain.

An older water main may be asbestos cement, and cutting concrete, pavement, or rock can raise silica dust. Neither a plan nor a ticket says what the material is. These are the model rules; check your state's.

Asbestos.

Whoever manages or controls the workplace must ensure, so far as is reasonably practicable, that asbestos there is identified by a competent person, and material a competent person reasonably believes is asbestos but cannot identify is assumed to be asbestos (r 422). Removal needs a licensed removalist, unless it is 10 square metres or less of non-friable asbestos, or minor asbestos-contaminated dust or debris, which a competent, trained person may remove; friable asbestos always needs a licensed removalist (r 458).[2] Our recommendation: check the owner's asbestos information before cutting, and stop and escalate on an unexpected find.

Silica.

Cutting, grinding, or drilling a material with at least 1% crystalline silica with power tools is processing, by the test published in the model WHS Regulations of 2025 (r 529A). It must be controlled, with at least one listed measure, such as wet suppression or on-tool extraction, and respiratory protection for anyone still at risk (rr 529B, 529C). The business assesses whether it is high risk, and if it is, a silica risk control plan comes first, or, where the processing is also high risk construction work, a SWMS that meets the plan's terms (rr 529CA, 529CB).[2]

The road, and who runs the project.

A dig in the street is also traffic work, and a larger job can be a construction project.

Traffic.

Construction work on, in, or next to a road in use by traffic other than pedestrians is high risk construction work, so it needs a SWMS (r 291(n); page 11).[2] Our recommendation: hold the traffic management plan and the road authority's requirements, and check the controls on the street, not only the tickets: barriers, plant separation, a walking route, night lighting, and a re-check when conditions change.

The principal contractor.

A construction project is construction work costing AU$250,000 or more (r 292). A business that commissions one is its principal contractor, unless it engages another business as principal contractor and authorises it to manage or control the workplace and carry out the principal contractor's duties (r 293), and the principal contractor prepares a written WHS management plan before work starts (r 309).[2] Victoria's principal contractor duties start at AU$350,000, and South Australia's figure is AU$450,000.[24, 25] Our view: define the project and its cost first; not every maintenance order is a project.

07 CONFINED SPACES AND FIELD HAZARDS

Below ground, and alone.

Water and sewer networks add two risks the rest of the network sees less often. Each has its own rule, and each is easy to miss in a contractor's paperwork.



Confined spaces: the test, then the controls.

A confined space is an enclosed or partially enclosed space that is not designed or intended primarily for people to occupy, is at normal atmospheric pressure while anyone is in it, and carries a risk from its atmosphere, contaminants, or engulfment (r 5).[2] A pit, wet well, or tank is not one by default: classify the space and the task.

Before entry.

A competent person's written risk assessment (r 66); risk from connected plant and services eliminated or minimised, as by isolation (r 70); a standby person and communication (r 69); rescue set and practised (r 74).[2]

The atmosphere.

Assessed before entry and as it may change (r 66). While anyone works inside: contaminants purged or ventilated so far as is reasonably practicable, never with pure oxygen; a safe oxygen level, or supplied-air breathing equipment where that is not reasonably practicable (r 71); flammable gas under 5% of its lower explosive limit so far as is reasonably practicable, and workers out at once at 10% or more, or from 5% without a continuous-monitoring detector, by the limits published in the model WHS Regulations of 2025 (r 72); no ignition source that could start a fire or explosion (r 73).[2]

The permit.

No worker is directed in without a written entry permit, completed by a competent person, naming the space, the people allowed in, the time, and the controls, with room to sign that everyone has left (r 67). It records the controls; it does not replace them.[2]

When the readings are not right.

Construction work in an area that may have a contaminated or flammable atmosphere is high risk construction work, which needs a SWMS (r 291(l); page 11).[2] Our recommendation: a competent person reads the results against the entry procedure, and if the atmosphere or a control is not as the assessment requires, nobody goes in, and anyone inside comes out.

Working alone, or out of reach.

A technician alone at a reservoir, or a patrol on a rural line at night, is doing remote or isolated work: work isolated from help because of location, time, or the nature of the work. It needs a system of work that includes effective communication with the worker (r 48).[2] Decide who watches the check-ins, and what a missed one triggers. A check-in covers work outside the space: entry into a confined space still needs the standby person, communication, and practised rescue (rr 69, 74).

07 CONFINED SPACES AND FIELD HAZARDS

Gas, sewage, and drinking water: what each job adds.

Our recommendation, not a national procedure: each of these tasks names its competent owner and follows the network operator's own procedure.

Gas work.

Isolation and depressurising under the gas network's procedure; ignition sources controlled; leak checks before the job closes; and recommissioning only by whoever the network authorises. Construction work near pressurised mains also needs a SWMS (page 16).

Sewage and chemicals.

Protection from sewage exposure: gloves and eye protection, washing facilities, and cleaning up before eating. Treatment chemicals handled to their safety data sheets and kept from incompatible substances.

A drinking water repair.

Contamination kept out of the main during the repair; cleaning, disinfection, sampling, and release follow the supplier's approved plan, not a procedure of the contractor's own.

Drinking water: what the supplier must have in place.

In Queensland a drinking water service provider must not run a drinking water service without an approved drinking water quality management plan, and must comply with it; the plan identifies the hazards and hazardous events that may affect water quality (Water Supply (Safety and Reliability) Act 2008 (Qld) ss 92, 93, 95).[11] An executive officer can also be liable for these offences (s 92 Note, s 93 Note).[11] Other states have their own laws, and the Australian Drinking Water Guidelines are national guidance.[12] Our recommendation: where a contractor works on a drinking water asset, the plan's controls are part of the job's permit.

The other hazards on a network.

Prompts, not a list for every job. Pick what the task brings, and name who controls each one and how it is checked on the day.

Hazard	Prompt
Heights	Poles, towers, tanks, and reservoirs: falls controlled, and, where a fall arrest system is used, rescue procedures set and tested before anyone goes up (rr 78 to 80).[2]
Lifting and plant	Exclusion zones, a lift plan, and the operator's licence class sighted (page 3).
Radio frequency	At telecommunications sites, RF-controlled areas marked, and entry limited to people briefed on them.
Weather and heat	Stop rules for lightning, high wind, and heat, written before storm season.
The public	People kept apart from the work, and a plan for an aggressive or distressed member of the public.
Long restorations	Workload, rest, and relief planned, as for fatigue (page 11).

Stop, then restart.

A worker may cease, or refuse to carry out, work if they have a reasonable concern that it would expose them to a serious risk from an immediate or imminent exposure to a hazard (s 84), and a trained health and safety representative may direct that unsafe work cease (s 85).[1] Our recommendation: add a contract rule on top. An unknown service, a failing isolation, unsafe weather, or a bigger dig than planned stops the job. It restarts only when the hazard is dealt with, the workers and other duty holders are consulted, and the assessment, permit, and SWMS are reviewed, on the word of a named restart role. A deadline does not override an unresolved safety concern.

08 CRITICAL INFRASTRUCTURE

The people who can reach the asset.

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

Which assets it covers.

Selected tests under the Security of Critical Infrastructure Act 2018 (Cth): a transmission or distribution network serving at least 100,000 customers is a critical electricity asset; a gas distribution network serving at least 100,000 customers is a critical gas asset; and the water or sewerage systems one utility manages, delivering to at least 100,000 water connections or 100,000 sewerage connections, are a critical water asset (ss 10, 12, and s 5).[9] They are not the only tests: some generation stations, gas processing and storage facilities, and gas transmission pipelines and their control rooms are covered too (s 10(1)(b), s 12(1)).[9] Our recommendation: record which asset class applies, and why, rather than inferring it from the utility's size.

Electricity, gas, and water: the risk program.

The risk management program duty applies to these classes, among others (Rules s 4(1)).[10] The responsible entity must adopt and maintain a critical infrastructure risk management program (s 30AC): a written program to identify each hazard with a material risk of a relevant impact on the asset and, so far as is reasonably practicable, minimise or eliminate it and mitigate its impact (s 30AH(1)).[9]

Telecommunications: its own rules, not an exemption.

A carrier's critical telecommunications assets, and a carriage service provider's critical assets that supply at least 20,000 active services or serve a Commonwealth entity, are not on that list, but they have their own: the Telecommunications Security and Risk Management Program Rules 2025 apply the same program duty to them (ss 5, 7), with the same four personnel requirements below (s 12).[20] The responsible entity must also protect the asset so far as is reasonably practicable, including competent supervision of and effective control over it (Act s 30EB), and, for a carrier's asset, notify the Secretary of a change likely to have a material adverse effect on that protection (s 30EC; TSRMP s 16).[9, 20]

The four personnel requirements.

For personnel hazards, both sets of Rules require four things, read in order. On page 20: what the enhanced rules add for electricity, gas, and water.[10, 20]

1

Identify critical workers.

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

Act s 5; Rules s 9(1)(a); TSRMP s 12(1)(a)[9, 10, 20]

2

Assess before access.

A critical worker reaches critical components only once assessed as suitable. For electricity, gas, and water, the enhanced rules decide how, and allow one recorded exception (page 20).

Rules s 9(1)(b), s 9A; TSRMP s 12(1)(b)[10, 20]

3

Manage the insider risk.

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

Rules s 9(1)(c)(i); TSRMP s 12(1)(c)[10, 20]

4

Off-board properly.

And the same for the risks of off-boarding outgoing employees and contractors: access removed when the contract ends.

Rules s 9(1)(c)(ii); TSRMP s 12(1)(c)[10, 20]

08 CRITICAL INFRASTRUCTURE

Electricity, gas, and water: the enhanced rules.

From 10 June 2026, the Rules add enhanced requirements for critical electricity, gas, and water assets on top of the baseline, phased in over 2 years (below); where the two differ, the enhanced one wins (Rules s 4A(1), (3), (4), (6)).[10] For a critical worker, they set two separate routes to access. Keep them apart in the record: only the first is a suitability assessment.

Route 1: assessed as suitable.

Either an AusCheck background check, then the entity's own assessment of the worker as suitable, or a relevant security clearance held when the person was identified as a critical worker (s 9A(4)). A relevant clearance is an active Australian Government clearance at Negative Vetting 1 or higher (s 3); a pending application is not one (s 9A(4) Note).[10]

Route 2: exceptional access, recorded.

Where a worker cannot meet those requirements, access is permitted only if the program sets out the risk of employing that worker and the actions taken, or to be taken as soon as reasonably practicable, to minimise or eliminate it (s 9A(3)(a)(ii)).[10] It is not a clearance. Our recommendation: record the basis, who approved it, the restrictions, and when it is reviewed.

Suitability is checked again, not once.

The program must proactively monitor, identify, and act on changes that may affect a critical worker's ongoing suitability (s 9A(3)(b)). For ongoing access, the AusCheck check is repeated at least every 5 years (s 9A(5)(c)), and a clearance is revalidated, or replaced by an AusCheck check and assessment, before it lapses or expires (s 9A(6)).[10] A renewal date alone misses the change in between.

When the enhanced rules apply.

For an asset already covered before 10 June 2026, the enhanced rules arrive in two steps (s 4A(6)). An asset that becomes covered later counts each period from that date.[10]

1

Now.

The baseline personnel requirements on page 19, and the rest of the baseline program.

Rules s 9[10]

2

After 12 months.

Access management: unauthorised or unsupervised access, credentials and privileged access, people who are not critical workers, and incoming and outgoing critical workers (s 9A(2)).

s 4A(6)(a): June 2027[10]

3

After 24 months.

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

s 4A(6)(b): June 2028[10]

Reported every year, and kept to those who need it.

Each entity gives an annual report on its program within 90 days after the end of the financial year (s 30AG(2)), which is 28 September for a year ending 30 June; where the entity has a board, council, or other governing body, that body approves the report (s 30AG(2)(f)).[9] Our recommendation: the gate sees only a critical worker's status (identified, the route, any restriction, the next review, access ended), linked to the safety record. Vetting detail, identity documents, and sensitive asset details stay with the people authorised to see them, with access logged (page 23).

09 WORKED EXAMPLE

A burst water main on a suburban street.

A water utility in a state that uses the model laws, 10 pm on a Friday. A main has burst under a suburban street with overhead power lines and a gas main beside it. Three contractors are called out. The rule numbers are the model's; check your own state's, and in Queensland see page 9.

What is live	Why it matters	What gets checked and kept
The dig	The utility manages the site, so it gets current services information before the excavator starts and gives it to the civil contractor (r 304);[2] our recommendation is that it also has the services located on the ground (page 15). A trench 1.5 metres deep or more needs its sides supported, unless a geotechnical engineer advises in writing that they are safe (r 306).[2]	The plans, dated and passed on, and the locating record; the SWMS; shoring, benching, or battering, or the written advice (page 16); the pipe material checked before cutting; return to service under the supplier's plan (page 18)
The lines overhead	The excavator's boom must stay outside an unsafe distance from the line, or the risk is assessed and the electricity supply authority's requirements are followed (r 166).[2]	The distance set for the job, a spotter where the assessment calls for one, and the authority's requirements
The gas main	Excavation near pressurised gas mains is high risk construction work, so a SWMS before it starts (r 291(i); page 16).[2]	The SWMS, the gas network told before the dig, and its procedure for any work on the main (page 18)
The traffic	Construction work on, in, or next to a road in use by traffic other than pedestrians is high risk construction work (r 291(n)).[2]	The SWMS; barriers, the pedestrian route, lighting, and plant separation checked on the street (page 16); the controllers' tickets
The pump station, later	The plumber isolates at a pump station with nobody else there: remote or isolated work, so a system of work with effective communication (r 48).[2] If the wet well is a confined space, a written entry permit first (r 67), with a standby person and practised rescue; a check-in does not cover entry (rr 69, 74).[2]	The check-in plan and who watches it; the permit, the readings, the standby, and the rescue plan
If something goes wrong	A notifiable incident is reported to the regulator immediately after the business becomes aware of it, by the fastest possible means (s 38(1), (2)).[1]	The incident card (page 27), agreed before the night: one lead notifier, but each business keeps its own duty to make sure notice is given (s 38; page 6); who preserves the site, tells other utilities and regulators, and calls the security lead if a control system is involved

The same night, on paper and joined up.

The same four checks, done two ways. On the left is what a regulator usually finds; on the right is what it should find.

On paper

The civil crew's supervisor holds the services plans on his phone; the traffic company's tickets were last checked at tender; the plumber's licence is in a folder at the head office; nobody knows who is still on site at 2 am.

Joined up

Each worker signs in at the street on arrival, licence and tickets checked against the record; the plans, the SWMS, and the permit sit on the job; the live list shows who is in the trench, and the plumber's check-ins are watched.

10 THE RECORD

What to hold for every contractor.

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

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

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

Level	What to hold	Status and source
The company	Its electrical contractor licence where your state requires one, such as Queensland, and any network accreditation, each held apart from its workers' licences	**LAW** such as Qld s 56, page 12 [5] **POLICY** your network's rules
	Public liability and any other cover the contract asks for, with expiry dates; its workers compensation cover under its own scheme	**POLICY** the contract **LAW** the employer's workers compensation scheme
	Where the asset is a critical infrastructure asset, a carrier's telecommunications asset included: whether the contractor supplies critical workers, and its part in the program	**LAW** SOCI Act s 30AC; Rules ss 9, 9A; TSRMP Rules s 12; pages 19 and 20 [9, 10, 20]
The worker	Written evidence of any high risk work licence, sighted before the work; its class, scope, conditions, and current status checked; reviewed again on a suspension, an incident, or a change of scope; a renewal does not re-approve on its own	**LAW** r 85(1) [2] **GOOD PRACTICE** the status check
	The electrical licence your state requires for the work, its class and status; in Queensland, the register of licensed workers	**LAW** your state's licensing law, such as Qld ss 55, 57AB, page 12 [5]
	For live work: the recorded risk assessment and its own SWMS, and the safety observer's rescue and resuscitation assessment within the previous 12 months, unless testing-only work has no serious risk; required in its own right, as well as any construction SWMS	**LAW** rr 158, 161(4), (5), page 13 [2]
	General construction induction training; tickets such as confined space entry and traffic control	**LAW** r 317 [2] **GOOD PRACTICE** the other tickets
	For customer cabling: the cabler's registration and its category, or the registered cabler directly supervising; the completion statement	**LAW** Cabling Provider Rules ss 21, 25, page 13 [23]
	For a critical worker, linked to that person: access scope; the route (assessed as suitable, with how and when, such as the AusCheck check or clearance and its date where the enhanced rules apply, or the recorded exceptional access); restrictions; next review; date access ended. Vetting detail is held only by those authorised to see it	**LAW** Rules s 9(1)(b), (c)(ii), s 9A(3) to (6), page 20 [10] **GOOD PRACTICE** the dates and the restricted view
The site and the visit	A site induction, including emergency procedures and hazards; a SWMS for high risk construction work; the services information before any dig, given to the excavating business, and how the services were located; the asbestos information before cutting; a written confined space entry permit; sign in and out by site	**LAW** r 39, r 299, r 304, r 422, r 67 [2] **GOOD PRACTICE** the induction form, the locating record, and sign-in
	The permit and isolation record, each worker's network authorisation, and the signed handback, with any isolation or restriction that stays and who controls it; on a drinking water asset, the plan's controls for the job	**LAW** the duties these show, ss 19, 20(2); the operator's system, page 12; in Queensland the plan, s 93, page 18 [1, 11] **GOOD PRACTICE** the record and the forms

10 THE RECORD

The incident.

What an event adds to the record. Tags as on page 22.

Level	What to hold	Status and source
The incident	Under the model Act as at 5 December 2025, where adopted, violent incidents are notifiable too, notifiable suicides and extended absences (within 14 days) are added, and one notice per event is enough; no business's own duty moves, and a serious event is escalated at once (page 27)	LAW ss 14, 35, 35A, 35B, 38(1), (1A), where adopted [1] GOOD PRACTICE the escalation

How long to keep it.

Keep each record for the longest of the legal minimum, any government records rules that bind you, and any incident or claim hold. One expiry field cannot do this: each class has its own trigger. The minimums are the model's unless another law is named.

Record	Minimum, and what starts it	Source
High risk work licence evidence	At least 1 year after the high risk work is carried out	r 85(4) [2]
Live work risk assessment and SWMS	The assessment until at least 28 days after the work is completed, the SWMS until it is completed; both at least 2 years after a connected notifiable incident	r 162 [2]
Confined space risk assessment and permit	The assessment until at least 28 days after the work is completed, the permit until it is completed; both at least 2 years after a connected notifiable incident	r 77 [2]
Construction SWMS	Until the high risk construction work is completed; at least 2 years after a connected notifiable incident	r 303 [2]
Services information	Until the digging is finished, or at least 2 years after a connected notifiable incident	r 304(6) [2]
Notifiable incident record	At least 5 years from the day the regulator is notified	s 38(7) [1]
Queensland register of licensed workers	At least 5 years after the person stops being engaged	Qld s 57AB [5]
Cabling completion statement	The cabler keeps a copy for at least 1 year	Cabling Rules s 25(5) [23]
Critical worker decisions	No period in the Rules read for this guide. Our recommendation: while the worker has access, then under your records rules	Good practice

Who sees what.

The employee records exemption covers only an employer's records of its own current or former employees, so it does not cover what you hold about a contractor's workers (Privacy Act 1988 (Cth) s 7B(3)). [17, 18] It does not settle every privacy duty either: which law applies is for your own entity to work out. Our recommendation: the field sees status only; vetting, identity, health, and sensitive asset details stay with authorised roles, with a stated purpose, access logged, secure transfer, a retention period, and a plan for a provider's exit.

10 CHECKLIST

Before a contractor starts.

Each line is tagged: the law, or our recommendation. Fill in the owner and evidence as you go. It runs over two pages.

	Check	Owner	Date and evidence ref.
Before engagement			
☐	We know which WHS law and regulator apply to us and to each contractor, and which electrical, gas, or water safety law sits beside it. **Law, page 9** the network access map, page 26		
☐	The company's electrical contractor licence where the state requires one, its network accreditation, insurance, and workers compensation cover are on file, with dates, apart from its workers' licences. **Law, pages 12 and 22** **Policy** the contract		
☐	On a critical infrastructure asset, a carrier's telecommunications asset included, we know which of its workers are critical workers, and none reaches critical components except by a recorded route: assessed as suitable, or, under the enhanced rules, the program's recorded exceptional access. **Law, pages 19 and 20**		
☐	Where the enhanced rules apply, ongoing suitability is monitored, and AusCheck checks and clearances are renewed before they lapse, on the dates that apply to the asset. **Law, page 20** **Good practice** the review dates		
☐	Each construction project, by the values on page 16, has its principal contractor named, and a WHS management plan. **Law, page 16**		
Before the first shift			
☐	Each worker's electrical licence, high risk work licence, and tickets are on file, with class, scope, conditions, and current status. **Law, pages 3 and 12** **Good practice** the status check		
☐	A SWMS for each kind of high risk construction work, including work on or near energised services or pressurised gas mains, in or near trenches deeper than 1.5 metres, on or next to roads in use by traffic, and in or near confined spaces; a silica risk control plan for high risk silica work, or, where it is also high risk construction work, a SWMS that meets its terms. **Law, pages 11, 16, and 17** versions and dates		
☐	Customer cabling is done by a registered cabler of the right category, or under one's direct supervision, with the completion statement. **Law, page 13**		
On the day, at the site			
☐	Every worker signed in and out, and any high risk work licence sighted before the work, not after. **Law, page 3 (licences)** **Good practice** sign-in by site		
☐	Other electrical work: tested first; done dead and kept dead; live only for a listed reason, after the recorded risk assessment and authorisation, with its own SWMS and a safety observer, unless testing-only work has no serious risk. **Law, page 13** the permit and the test record		
☐	Supply-authority work and network controls: each worker's network authorisation checked, isolations by the authority for that system, each worker fit for this shift, and the handback accepted, isolations removed or transferred only as authorised. **Law, pages 11 and 12 (ss 19, 20(2); the operator's system where your state requires one)** **Good practice** the authorisation check, the isolation authority, the fitness check, the permit, and the handback		

10 CHECKLIST

Before a contractor starts, continued.

The ground, the air, and the road on the day, then what stands behind every job.

	Check	Owner	Date and evidence ref.
	On the day, at the site, continued		
☐	Services information obtained before the dig and given to the excavating crew, and the services located on the ground; the distance from electric lines set, or assessed with the authority's requirements. **Law, page 15 (r 304, r 166)** **Good practice** locating the services on the ground, and the locating record		
☐	Before cutting a pipe, pit, or pavement: the asbestos information checked, or the material assumed to be asbestos, and silica processing controlled. **Law, page 16 (r 422, r 529C)** **Good practice** checking the owner's asbestos information		
☐	Traffic controls checked on the street: barriers, the pedestrian route, lighting, and plant separation, not only the controllers' tickets. **Law, page 16 (the SWMS)** **Good practice** the street check		
☐	A confined space classified first; if it is one: risk assessment, isolation, standby, rescue plan, atmosphere controls as the rules require, a written entry permit, and nobody in while the readings or controls are not right. **Law, page 17** permit numbers **Good practice** the stop rule when the readings or controls are not right		
☐	A worker alone has a way to call for help that works there; someone watches check-ins and escalates a missed one. **Law, page 17** **Good practice** the check-in plan		
☐	Gas, sewage, and drinking water work follows the operator's procedure, and the other hazards the task brings have an owner and a check. **Good practice, page 18**		
☐	Every crew knows the stop-and-escalate rule, and who may restart the job. **Law, page 18 (ss 84, 85)** **Good practice** the contract rule		
	If something goes wrong, and standing		
☐	The incident card on page 27 is agreed with each contractor: who gives the notice as lead notifier, immediately as the law requires; who preserves the site; who tells any other regulator, the asset owner of any strike, and the security lead; each business keeps its own duty. **Law, pages 21 and 27** **Good practice** the agreed route		
☐	Records kept to the schedule on page 23, with vetting detail restricted to those authorised. **Law, page 23 (the minimums)** **Good practice** the restricted view		
☐	Officers receive a regular report that verifies the checks happen: overdue actions, and a sample of permits and SWMS checked against the work done. **Good practice; verifying is part of due diligence, s 27(5)(f)**		

10 TEMPLATE

The network access map.

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

Site or asset	Which laws, which regulators	Who controls it	Who authorises access and work	Lines, services, and spaces	Critical workers	After hours, and who reports
Example: a sewage pump station and its rising main, south-east Queensland	*WHS law, Workplace Health and Safety Queensland; Electrical Safety Act for the switchboard; the drinking water plan does not apply to sewer; SOCI Act: at least 100,000 sewerage connections, so a critical water asset; the risk program Rules apply (recorded 01/03/2026)*	*The water utility's network operations*	*The operations supervisor; isolations placed and removed only by the authorised officer for each system*	*Overhead line on the boundary; gas main under the access road, located on site; the wet well, a confined space, with standby and rescue; handback to network operations*	*Two named control system technicians, each assessed as suitable on 03/03/2026; remote access only; next review 03/03/2027*	*Technicians alone at night, check-ins to the control room; the incident card agreed with each contractor; the utility gives the notice as lead notifier; each keeps its own duty. Reviewed 01/11/2026*

How to keep the map true.

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

Fill it in together.

Operations, asset management, safety, security, and procurement agree each row. A disagreement is a gap in who does what.

Review it on any change.

A new maintenance contract, a capital project, a changed critical worker, or a new storm roster changes the row. Give each row a review date.

Keep it with the record.

The depot, the control room, and the on-call manager need to see the row when a contractor arrives, and only the status, not the vetting detail behind it.

10 TEMPLATE

The incident card.

One card per site or job, agreed with every contractor before work starts and kept where the crew can reach it. A utility event can start several clocks at once, and one WHS notice does not answer the others. Fill in the last column.

Route	What starts it, and the clock	Who, their number, and a backup
Emergency services	Anyone hurt or in danger: 000 first. Give the site's address or nearest cross street, and where emergency vehicles get in.	
The WHS regulator	A notifiable incident: immediately after becoming aware, by the fastest possible means; a written notice within 48 hours if the regulator asks; the record kept for at least 5 years from the notice (s 38(1), (2), (4), (7)). One lead notifier may give it, but each business keeps its own duty. [1]	
The site	Under the model Act as at 5 December 2025, where adopted: whoever manages or controls the workplace preserves the site, so far as is reasonably practicable, until an inspector releases it, and the evidence too, except to help the injured, make it safe, or as allowed (s 39); and the businesses with these duties tell each other at once, so far as is reasonably practicable (s 39A). [1]	
Other regulators	The electrical safety, drinking water, and environment regulators, where your state's law and the supplier's plan require it, each on its own clock (pages 9 and 18).	
A control system or cyber event	Where Part 2B of the SOCI Act applies to the asset: a cyber security incident that has had, or is having, a significant impact on its availability is reported as soon as practicable, and in any event within 12 hours of becoming aware; one that has had, is having, or is likely to have a relevant impact, imminent ones included, as soon as practicable and within 72 hours; an oral report is followed by a written record, with a copy to the relevant Commonwealth body, within 84 or 48 hours of the oral report (ss 30BB, 30BC, 30BD). [9] Our recommendation: a contractor tells the utility's security lead at once.	
Asset owners	Our recommendation: a strike on another utility's or a carrier's asset is reported to its owner at once (page 16).	
Records and evidence	Where each report, photograph, and reading is kept, and its reference.	

Card reviewed on ___/___/_____ by _____. Unless another law is named, section numbers are the model WHS Act's; in Victoria, read the OHS Act.

11 ONE STANDARD ACROSS THE NETWORK

The same standard at every site.

Every check in this guide has to work at every depot and every site, staffed or not, storm night included.

Questions to ask about how you manage it today.

1. If a regulator asked who worked on last Saturday's outage, and what each held, how long would the answer take?
2. At a pump station or zone substation with nobody there, who knows a contractor is in, and who answers when check-ins stop?
3. When an electrical licence, a network accreditation, or a safety observer's rescue assessment lapses, who finds out before the next shift?
4. Do you hold a contractor's network accreditation and each worker's licence separately, so one is never taken as proof of the other?
5. Before every dig, who gets the services information, and how do you know it reached the crew?
6. Which of your contractors' workers are critical workers, by which route was each given access, and when is each reviewed?
7. Have you agreed an incident card with each contractor: who reports, to which regulators, and who tells another utility about a strike?
8. How many hours a month go on chasing certificates?

What to look for in a system.

Seven capabilities that keep these checks working at every site.

- **Company and worker, kept apart.** A company's network accreditation and each worker's licence, checked on one record but never confused.
- **Requirements matched to the work.** Licences, tickets, inductions, and permits set by role and network, with extras where a region needs them.
- **Expiry tracked for you.** Reminders before anything runs out, so the depot is not chasing.
- **A check at the site.** A QR code or a tablet at the depot gate, checked at sign-in, after hours too, and for workers alone in rural areas.
- **Permits on the same record.** Switching, access, isolation, confined space, and gas work permits, closed from the field, and not approved with a required test missing.
- **Inspections that close.** Every failed item becomes an owned, dated action.
- **A record for the audit.** One searchable record per depot or region, with scheduled reports.

START SMALL

Start with one depot.

Take one depot or maintenance contract, fill in its row of the access map on page 26 and its incident card on page 27, and run the checklist on pages 24 and 25 against its contractors. Close the gaps first: worker ready, work authorised, controls in place. Then ask anyone offering a system to show each point above on your own network.

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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, the Electrical Safety Act 2002 (Qld), the Electricity Act 1996 (SA), the Water Supply (Safety and Reliability) Act 2008 (Qld), the Security of Critical Infrastructure Act 2018 (Cth) and its two sets of risk management program Rules, the Electrical Safety Regulation 2026 (Qld), the Occupational Health and Safety Regulations 2017 (Vic) r 332, the Telecommunications (Cabling Provider) Rules 2025, the Criminal Code (Cth) s 474.6, the Corporations Act 2001 (Cth) s 9AD, the Privacy Act 1988 (Cth) s 7B(3), and regulator guidance, as read on the dates above. Each jurisdiction enacts its own WHS, electrical safety, gas, and water law, so text and numbering can differ. For a decision about your own network, sites, and contractors, read the law that applies to you and take legal advice. It is a contractor management guide, not a technical manual.

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COMPLYFLOW

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

Get in touch.

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

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