

**Automotive Locksmithing Vehicle Entry and Key Programming**

Business Name:		ABN:
Business Address:		
Contact Person:	Phone:	Email:

**THIS RISK ASSESSMENT IS APPROVED BY THE PCBU ON THIS PROJECT**

Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.

Full Name:		
Signature:	Title:	Date:

**CLIENT OR PRINCIPAL CONTRACTOR DETAILS**

Client:	SCOPE OF WORKS
Project Name:	
Project Address:	
Project Manager:	
Contact Phone:	
Date Risk Assessment supplied to Project Manager:	



RISK MATRIX									
LIKELIHOOD	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC	SCORE	ACTION	HIERARCHY OF CONTROLS	
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE			<b>Elimination</b> Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	<b>Substitution</b> Replace the hazard.	
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Review before work starts.	Isolation Isolate People from the hazard	
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	2M MODERATE	Ensure control measures in place.	<b>Engineering</b> Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	<b>Administrative</b> Change	
								<b>PPE</b>	

  

Risk Rating & Required Action:	
<b>4A</b>	Stop work. The risk is intolerable. Eliminate the hazard or redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or higher-level authorisation is required.
<b>3H</b>	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
<b>2M</b>	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
<b>1L</b>	Proceed, following standard operating procedures. Monitor and keep records.

  

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
<b>Catastrophic</b>	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
<b>Major</b>	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
<b>Moderate</b>	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
<b>Minor</b>	First-aid only, no lost time	negligible delay	Isolated non-conformance
<b>Insignificant</b>	No injury	no schedule impact	Deviation caught and corrected on site

  

**Notes on Hierarchy of Controls:**  
Remember to apply controls in the preferred order shown by the coloured pyramid:

1. **Eliminate**
2. **Substitute**
3. **Isolate**
4. **Engineering**
5. **Administrative**
6. **PPE**

Always document **why** a lower-order control is accepted if elimination or substitution is not reasonably practicable.

*aligned with Safe Work Australia's Managing the risk of fatigue at work (2023) and ISO 45001:2018 clauses 6–8.*

JOB STEP	POTENTIAL HAZARDS	IR	CONTROL MEASURES	RR
SPECIFIC WORK STEPS	HAZARDS THAT MAY ARISE	INITIAL RISK	SPECIFIC MEASURES TO BE PUT IN PLACE TO ELIMINATE OR CONTROL THE RISKS	RESIDUAL RISK
1. Governance, Legal Compliance & WHS Duties	<ul style="list-style-type: none"> <li>Lack of documented WHS management system aligned to WHS Act 2011 and WHS Regulations</li> <li>Unclear PCBU, officer, worker and subcontractor WHS duties for mobile locksmith work</li> <li>Inadequate consultation mechanisms with workers regarding changing risks in automotive locksmithing</li> <li>Failure to monitor changes in legislation, Australian Standards and manufacturer requirements for vehicle entry and key programming</li> <li>No formal WHS objectives, targets or KPIs for mobile and workshop-based locksmith services</li> <li>Inadequate incident reporting, investigation and corrective action processes</li> <li>Poor integration of WHS requirements into contracts with clients, strata managers and motor dealers</li> </ul>	4A	<ul style="list-style-type: none"> <li>Establish and maintain a documented WHS management system aligned with WHS Act 2011, WHS Regulations and relevant Codes of Practice specifically covering automotive locksmithing activities</li> <li>Define and communicate roles, responsibilities and accountabilities for officers, managers, supervisors, workers and subcontractors involved in vehicle entry and key programming</li> <li>Implement a formal WHS consultation process (e.g. toolbox talks, safety meetings, HSRs) that specifically addresses automotive work environments such as roadside, car parks, workshops and customer premises</li> <li>Develop a WHS legal and standards register and schedule regular reviews to capture updates to vehicle safety, electrical and security-related legislation and manufacturer instructions</li> <li>Set measurable performance indicators for mobile locksmith operations (e.g. incident frequency, near miss reporting, training completion, vehicle damage events) and review them at management meetings</li> <li>Implement a standardised incident and near miss reporting procedure, including investigation templates to identify root causes and systemic corrective actions</li> <li>Embed WHS expectations and minimum standards (e.g. safe access to vehicles, safe work areas, emergency contacts) into contracts and service agreements with key clients and suppliers</li> </ul>	3H
2. Competency, Licensing & Training Systems	<ul style="list-style-type: none"> <li>Inadequate trade qualifications or locksmith-specific competencies for complex automotive work</li> <li>Lack of formal verification of competency for new workers, casuals and subcontractors</li> <li>No structured induction covering WHS requirements for mobile vehicle entry and key programming work</li> <li>Insufficient training on late-model vehicle systems, transponder technologies and OEM procedures</li> <li>Lack of training in managing conflict or aggression from distressed customers in lockout situations</li> <li>Inadequate training on electrical hazards related to vehicle electronics, batteries and ignition systems</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop and maintain a competency framework for automotive locksmithing roles, including trade qualifications, product-specific training and WHS competencies</li> <li>Implement a documented induction program for all workers and subcontractors that covers WHS duties, mobile work risks, emergency procedures and client interaction requirements</li> <li>Use a competency assessment process (e.g. practical assessments, observation checklists) before allowing unsupervised work on vehicle entry and key programming</li> <li>Provide manufacturer-specific and industry training on transponder keys, remote programming, immobiliser systems and safe access methods for cars and motorcycles</li> <li>Include training modules on de-escalation, dealing with distressed or aggressive clients, and managing work in public or high-traffic areas</li> <li>Provide training on low-voltage and vehicle electrical safety, including safe handling of batteries, wiring, ignitions and electronic modules during key programming and ignition rebuilding</li> <li>Maintain a training matrix and schedule refresher training and toolbox talks to address emerging vehicle technologies, new tools, incidents and near misses</li> </ul>	2M

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	<ul style="list-style-type: none"> <li>No refresher training program, leading to skill decay and unsafe shortcuts</li> </ul>			
3. Worker Fitness for Duty & Fatigue Management	<ul style="list-style-type: none"> <li>Workers attending after-hours and emergency callouts while fatigued</li> <li>No formal system to manage extended shifts or frequent night and weekend work</li> <li>Workers driving between jobs while tired, increasing crash risk</li> <li>Inadequate consideration of medical conditions, medications or substance use affecting safe work</li> <li>Lack of procedure for workers to self-report fatigue or fitness issues without fear of reprisal</li> <li>Irregular work patterns and long on-call periods leading to cumulative fatigue</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop and implement a fatigue management procedure that sets maximum shift lengths, minimum breaks and limits on consecutive days worked for mobile locksmiths</li> <li>Establish an on-call roster system that balances emergency response requirements with adequate rest periods</li> <li>Include fitness-for-duty and fatigue awareness training in inductions and refresher programs, including recognition of early warning signs</li> <li>Implement a confidential reporting process for workers to declare fatigue, impairment or health conditions that may affect safe performance</li> <li>Require pre-employment and periodic medical declarations appropriate to driving and manual handling tasks and refer workers to occupational health professionals where needed</li> <li>Monitor working hours, callout logs and travel distances, and adjust staffing levels or rostering where excessive hours are identified</li> <li>Ensure supervisors are trained to identify fatigue indicators and to implement immediate risk controls such as reallocating tasks or arranging transport</li> </ul>	2M
4. Vehicle Fleet Safety & Maintenance Systems	<ul style="list-style-type: none"> <li>Company or personal vehicles used for work without formal safety assessments</li> <li>Inadequate maintenance program for work vehicles used for mobile locksmith services</li> <li>Use of vehicles not designed for carrying tools, key-cutting machines and programming equipment</li> <li>Lack of restraint systems, seats and parts, creating projectiles in a crash or sudden braking</li> <li>No pre-start inspection process to detect defects such as worn tyres, faulty brakes or lights</li> <li>Use of motorcycles or scooters for rapid response without appropriate risk controls</li> </ul>	4A	<p>[REDACTED]</p>	2M
5. Journey Management & Mobile Work Planning	<ul style="list-style-type: none"> <li>Unplanned travel to unfamiliar locations for lockouts and key replacement jobs</li> </ul>	4A	<p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> <li>Driving to customers in high-risk environments (e.g. highways, roadside breakdown lanes, remote areas)</li> <li>Insufficient time allocated between jobs, leading to speeding or unsafe driving behaviour</li> <li>No formal system to manage travel in poor weather, at night or in high-crime areas</li> <li>Single worker response to remote or isolated jobs without adequate communication or oversight</li> <li>Inaccurate job information resulting in arrival at unsafe vehicle locations (e.g. blind bends, narrow shoulders)</li> </ul>		[REDACTED]	
6. Remote & Isolated Work, Communications & Duress	<ul style="list-style-type: none"> <li>Workers attending lockouts or key extraction jobs alone at night or in isolated car parks</li> <li>Inadequate mobile phone coverage during rural or remote callouts</li> <li>No duress or escalation process if a worker feels threatened by a client or bystanders</li> <li>Lack of system to track worker location and status during jobs away from the workshop</li> <li>Delayed emergency response due to unclear procedures or inaccurate location information</li> <li>No formal pre-job risk screening for potentially volatile or criminal situations (e.g. vehicle theft disputes)</li> </ul>	4A	[REDACTED]	2M
7. Tools, Plant & Equipment Management	<ul style="list-style-type: none"> <li>Use of damaged or poorly maintained locksmith tools (e.g. picks, key cutting machines, extraction tools)</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>• Improvised tools or methods being used on vehicles and motorcycles due to lack of correct equipment</li> <li>• Failure of powered equipment used for cutting, grinding or coding keys</li> <li>• Lack of testing and tagging program for electrical tools used in the workshop and mobile vans</li> <li>• Inadequate storage systems leading to dropped objects, cuts and strains while handling equipment</li> <li>• Incorrect selection of tools for specific vehicle models, increasing risk of damage or sudden release of force</li> </ul>		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
8. Safe Systems for Vehicle Entry & Key Programming Activities	<ul style="list-style-type: none"> <li>• No standardised procedures for non-destructive vehicle entry and lockout resolution</li> <li>• Inconsistent practices for programming transponder keys and remotes, leading to unintended activation of vehicle systems</li> <li>• Uncontrolled interaction with airbags, steering locks and immobilisers during ignition rebuilding or key replacement</li> <li>• Accidental vehicle movement during programming or when working on steep or uneven surfaces</li> <li>• Insufficient safeguards to prevent working in travel lanes or other traffic-exposed positions</li> <li>• Inadequate verification that the person requesting access to a locked vehicle is the lawful controller</li> </ul>	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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9. Manual Handling & Ergonomic Risk Management	<ul style="list-style-type: none"> <li>• Frequent lifting and carrying of heavy toolboxes, key machines and diagnostic equipment between vehicle and worksite</li> <li>• Awkward postures when leaning into vehicles, footwells and under dashboards during key programming and ignition work</li> <li>• Repetitive fine-motor tasks when cutting keys and using small tools, increasing risk of cumulative strain injuries</li> <li>• Working at ground level or in cramped spaces around motorcycles and scooters</li> <li>• Lack of ergonomic design in van fit-outs and workshop benches used for automotive locksmith tasks</li> </ul>	3H	[REDACTED]	2M
10. Psychosocial Risks, Customer Interaction & Occupational Violence	<ul style="list-style-type: none"> <li>• Exposure to distressed, intoxicated or aggressive customers during car lockouts and lost keys</li> <li>• Working alone with members of the public in isolated car parks or driveways</li> <li>• High workload, urgent calls and after hours demands leading to stress and anxiety</li> <li>• Abuse or threats when workers cannot provide the desired service (e.g. vehicle cannot be opened or started)</li> <li>• No formal system to manage complaints, conflict or post-incident support for workers</li> </ul>	4A	[REDACTED]	2M
11. Information Security, Cyber & Data Management Risks	<ul style="list-style-type: none"> <li>• Unauthorised access to key programming devices and software that could enable vehicle theft</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Inadequate control of customer vehicle key codes, VIN data and immobiliser information</li> <li>Loss or theft of laptops, tablets or programming tools containing sensitive security data</li> <li>Use of unlicensed or compromised software and code databases for transponder programming</li> <li>Poor password and access management for diagnostic and key programming platforms</li> </ul>		[REDACTED]	
12. Environmental, Chemical & Fire Safety Management	<ul style="list-style-type: none"> <li>Use and storage of flammable liquids, lubricants and cleaners during lock and ignition work</li> <li>Generation of metal swarf and debris during key cutting and ignition rebuilding</li> <li>Inadequate ventilation in areas when using aerosols or solvents inside vehicles</li> <li>Improper disposal of damaged key, lock components and electronic fobs containing batteries</li> <li>Fire risk in vehicles or workshops due to electrical faults, charging stations or stored chemicals</li> </ul>	3H	[REDACTED]	1L
13. Security of Premises, Vehicles & High-Value Stock	<ul style="list-style-type: none"> <li>Theft of key blanks, programming devices, master keys or immobiliser equipment from workshops or vans</li> <li>Unauthorised after-hours access to locksmith premises storing high-value automotive security components</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Inadequate key control for company vehicles and secure storage areas</li> <li>Poor segregation of customer keys and codes from general workshop areas</li> <li>No formal response process to security breaches involving key stock or programming equipment</li> </ul>		[REDACTED]	
14. Contractor, Subcontractor & Third-Party Management	<ul style="list-style-type: none"> <li>Use of subcontract automotive locksmiths without adequate WHS vetting</li> <li>Inconsistent safety practices between in-house staff and contractors attending the same jobs</li> <li>Lack of clarity over who controls the worksite when multiple service providers attend vehicle breakdowns</li> <li>Insufficient induction of contractors regarding company procedures and client-specific requirements</li> <li>Poor communication channels for reporting hazards, incidents and near misses involving subcontractors</li> </ul>	3H	[REDACTED]	2M
15. Emergency Preparedness & Incident Response	<ul style="list-style-type: none"> <li>Lack of clear procedures for responding to vehicle accidents involving workers en route to or from jobs</li> <li>Inadequate planning for medical emergencies or injuries occurring at remote job locations</li> <li>No tested process for managing vehicle fires, battery incidents or airbag deployment during locksmith work</li> </ul>	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> <li>Workers uncertain about when and how to contact emergency services or notify management</li> <li>Absence of regular drills or simulations for likely emergencies such as roadside incidents or aggressive customers</li> </ul>		<div style="background-color: black; height: 15px; width: 100%;"></div>	

SAMPLE

**EMERGENCY RESPONSE – CALL 000 FOR EMERGENCIES**

Ensure to have an Emergency Management Plan in place as well as adequate numbers of trained first aid staff with easy access to fully stocked first aid kits, rescue equipment, material safety data sheets, adequate access to emergency communication equipment and fire-fighting equipment suitable for all classes of fire and ignition sources.

**LEGISLATIVE REFERENCES**

RELEVANT LEGISLATION AND CODES OF PRACTICE. DELETE THE LEGISLATIVE REFERENCES FOR ANY STATE THAT ARE NOT APPLICABLE

**Queensland & Australian Capital Territory**

Work Health and Safety Act 2011  
 Work Health and Safety Regulations 2011  
 Legislation QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/work-health-and-safety-laws>  
 Codes of Practice QLD: <https://www.worksafe.qld.gov.au/laws-and-compliance/codes-of-practice>  
 Legislation ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/acts-and-regulations>  
 Codes of Practice ACT: <https://www.worksafe.act.gov.au/laws-and-compliance/codes-of-practice>

**Victoria**

Occupational Health and Safety Act 2004  
 Occupational Health and Safety Regulations 2017  
 Legislation VIC: <https://www.worksafe.vic.gov.au/occupational-health-and-safety-act-and-regulations>  
 Codes of Practice VIC: <https://www.worksafe.vic.gov.au/compliance-codes-and-codes-practice>

**New South Wales**

Work Health and Safety Act 2011  
 Work Health and Safety Regulations 2025  
 Legislation NSW: <https://www.safework.nsw.gov.au/legal-obligations/legislation>  
 Codes of Practice NSW: <https://www.safework.nsw.gov.au/resource-library/list-codes-of-practice>

**Western Australia**

Work Health and Safety Act 2020  
 Work Health and Safety Regulations 2022  
 Legislation Western Australia: <https://www.commerce.wa.gov.au/worksafe/legislation>  
 Codes of Practice WA: <https://www.commerce.wa.gov.au/worksafe/codes-practice>

**Northern Territory**

Work Health and Safety (National Uniform Legislation) Act 2011  
 Work Health and Safety (National Uniform Legislation) Regulation 2011  
 Legislation NT: <https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws>  
 Codes of Practice NT: <https://worksafe.nt.gov.au/laws-and-compliance/codes-of-practice>

**Safe Work Australia Links**

Law and Regulation (All States): <https://www.safeworkaustralia.gov.au/law-and-regulation>  
 Model Codes of Practice: <https://www.safeworkaustralia.gov.au/resources-publications/model-codes-of-practice>

**South Australia**

Work Health and Safety Act 2012 (SA)  
 Work Health and Safety Regulations 2012 (SA)  
 Legislation for SA: <https://www.safework.sa.gov.au/resources/legislation>  
 Codes of Practice for SA: <https://www.safework.sa.gov.au/workplaces/codes-of-practice#COPs>

**Model Codes of Practice**

- Managing noise and preventing hearing loss at work
- Confined spaces
- Labelling of workplace hazardous chemicals
- Managing risks of hazardous chemicals in the workplace
- Welding processes
- First aid in the workplace
- Managing the risk of falls at workplaces
- Hazardous manual tasks
- Managing the risk of falls in housing construction
- Managing electrical risks in the workplace
- Demolition work
- Excavation work
- Work health and safety consultation, cooperation and coordination
- Managing the work environment and facilities
- How to manage work health and safety risks
- Managing risks of plant in the workplace
- Construction work

**Tasmania**

Work Health and Safety Act 2012  
 Work Health and Safety (Transitional and Consequential Provisions) Act 2012  
 Work Health and Safety Regulations 2012  
 Work Health and Safety (Transitional) Regulations 2012  
 Legislation for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/acts-and-regulations>  
 Codes of Practice for TAS: <https://worksafe.tas.gov.au/topics/laws-and-compliance/codes-of-practice>

Details of permits, licenses or access required by regulatory bodies (add or delete as required):

- Permits from local council
- Authorisation to commence work
- Any required documents.