

Commercial and Professional Diving

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			Elimination Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	Substitution 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.	Engineering Isolate the hazard	
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 HIGH	1L LOW	Monitor and keep records.	Administrative Change	
								PPE	

Risk Rating & Required Action:	
4A	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.
3H	Review and approve additional controls before task starts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
1L	Proceed, following standard operating procedures. Monitor and keep records.

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
Catastrophic	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
Major	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
Moderate	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
Minor	First-aid only, no lost time	negligible delay	Isolated non-conformance
Insignificant	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. WHS Governance, Legal Compliance and Diving Operations Management	<ul style="list-style-type: none"> Absence of a documented WHS and diving operations governance framework aligned with WHS Act 2011, WHS Regulations and AS/NZS 2299 series Inadequate identification of diving work that is 'high risk' under WHS Regulations and failure to apply additional controls No clear allocation of PCBU, officer, supervisor and diver responsibilities for commercial and professional diving activities (including police, military, research and aquaculture diving) Inadequate process to approve and manage specialised diving activities (e.g. saturation diving, mixed gas, nuclear, underwater demolition, blasting, offshore and maritime security diving) Failure to integrate diving WHS risks into the organisation's overall risk management system and risk register Inadequate review of lessons learnt from incidents and injury events, including hyperbaric and chamber events Poor consultation with workers, contractors and health and safety representatives on diving safety matters Lack of assurance that diving contractors maintain compliant systems (audit, pre-qualification, verification of competency) No formal management of change (MoC) process for new dive techniques, equipment types (e.g. rebreathers, surface supplied systems) or locations (caves, wrecks, ice, nuclear, harbour clearance, overhead environments) 	4A	<ul style="list-style-type: none"> Establish and maintain a documented Diving Safety Management System (DSMS) that aligns with WHS Act 2011, WHS Regulations, AS/NZS 2299 series and relevant Australian Defence, police, scientific and offshore standards Define and document roles, responsibilities and due diligence obligations for officers, dive supervisors, chamber operators, tender divers and support personnel in all commercial and professional diving contexts Implement a formal risk management procedure requiring identification, assessment, control and review of diving hazards at system level, including separate risk registers for specialised activities (e.g. saturation, nuclear, underwater demolition, harbour clearance) Develop a governance process for approval of non-routine or high-risk diving activities (e.g. cave, wreck, overhead environment, ice, deep sea treasure hunting, nuclear, underwater blasting and demolition) including independent technical review where needed Establish a contractor management procedure for diving service providers, including pre-qualification, review of DSMS/SMS, audit of training, maintenance and decompression systems, and ongoing performance monitoring Integrate diving WHS performance indicators (e.g. incidents, near misses, decompression sickness, hyperbaric events, equipment failures) into organisational WHS reporting to officers and boards Implement a consultation and communication framework that ensures divers and support staff can raise WHS concerns, participate in risk assessments and contribute to review of procedures Apply a formal management of change (MoC) process for introduction of new dive technologies, gases (e.g. nitrox, trimix), decompression software, rebreathers, saturation systems or major changes in dive profiles and locations Schedule periodic independent reviews or audits of the Diving Safety Management System and governance arrangements, with documented action plans and close-out tracking 	2M
2. Competency, Training and Diving Authorisation Systems	<ul style="list-style-type: none"> Divers, supervisors and support personnel lacking appropriate qualifications, licences and experience 	4A	<ul style="list-style-type: none"> Develop and maintain a competency framework and training matrix for all diving and hyperbaric roles, referencing AS/NZS 2299.1, ADAS and other recognised Australian qualifications and units of competency 	2M

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	<p>for specific commercial and professional diving activities</p> <ul style="list-style-type: none"> • Inadequate verification of competency for advanced activities such as saturation diving, deep water decompression, cave and overhead environment diving, nuclear diving, underwater blasting and demolition, and underwater criminal investigation • Failure to provide and verify specialist training in diving physiology, decompression theory, emergency surface ascents, in-water recompression (where allowed by policy), diver rescue and hyperbaric chamber operation • Insufficient training in specific techniques such as use of lift bags, use of bailouts, night diving, low visibility diving, ice diving, high current and surge, wreck penetration, bowline tying under water, stage cylinder rigging and left surface mark buoy deployment • Lack of competency frameworks for non-diver roles such as coordinators, supervisors, life support technicians, chamber operators, and topside support staff for saturation systems • No formal assessment of competency to use planning tools such as dive computers, decompression tables, PADI RDP training, running decompression software and nitrox/trimix blending calculations • Poor maintenance of records of training, assessments, refresher training and authorisations to dive for specific tasks (research diving, police diving, military and special forces diving, underwater photography, maritime security diving, aquaculture diving) 		<ul style="list-style-type: none"> • Implement a diver and supervisor authorisation system that links specific endorsements (e.g. surface supplied, saturation, mixed gas, nuclear, cave, wreck, ice, police, research, underwater demolition) to verified training, experience and medical clearance • Require formal training and assessment in diving physiology, decompression theory, decompression sickness recognition and management, emergency surface ascents, diver rescue and emergency response • Mandate specialist training and competency assessment for high-risk activities including underwater blasting and demolition, underwater cutting and welding, underwater pile driving, subsea drop testing, underwater drilling and use of air guns • Implement training programs and periodic practical assessments in core underwater skills such as buddy assisted gear donning, de-rigging gear post dive, bowline tying under water, search patterns (including lose line search strategy), use of lift bags and stage cylinder rigging • Provide competency-based training and assessment for hyperbaric chamber operation, hyperbaric treatment, therapeutic decompression, in-water recompression (where permitted by organisational policy) and saturation system maintenance • Ensure all personnel using planning tools and software (PADI RDP, decompression software, nitrox and trimix blending programs) receive structured training, with documented assessments and periodic refresher training • Maintain a central training and competency management system that records qualifications, experience logs, endorsements, expiry dates and scheduled refresher training for all diving personnel • Conduct regular practical emergency drills (diver rescue, lost diver, uncontrolled ascent, chamber fire, power failure, emergency evacuation) and document performance outcomes to inform retraining and procedural updates 	
3. Fitness for Work, Medical Assessment	<ul style="list-style-type: none"> • Inadequate diving medical assessments for commercial and professional divers, including those involved in saturation, mixed gas, 	4A	<ul style="list-style-type: none"> • Implement a medical fitness for diving policy requiring initial and periodic assessments by approved diving medical practitioners, consistent with AS/NZS 2299.1 and recognised commercial diving standards 	2M

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and Fatigue Management	<p>overhead environment and nuclear diving</p> <ul style="list-style-type: none"> Lack of processes to monitor and manage acute and chronic health issues relevant to diving (cardiovascular conditions, respiratory illness, seizures, mental health, obesity) No screening for impairments due to alcohol, drugs (including prescribed medication) or other substances that may elevate risk in diving and hyperbaric environments Poor fatigue management for extended shifts, offshore rotations, night diving, saturation system crew, hyperbaric chamber staff and emergency response teams Absence of policies to limit breath-holding diving and free diving in commercial and professional settings where not essential, or to manage the specific risks where required Inadequate management of stress, anxiety and claustrophobia associated with cave diving, wreck penetration, overhead environments, nuclear diving and hyperbaric chamber operations Lack of a process to ensure divers are acclimatised to cold water diving, high altitude diving and extreme weather environments prior to undertaking demanding tasks 		<ul style="list-style-type: none"> Maintain confidential records of diving medicals, fitness for work assessments and any restrictions, with an auditable process to ensure only medically cleared personnel are rostered for diving and chamber duties Establish a drug and alcohol management procedure, including pre-deployment screening, for-cause testing and clear rules on medication disclosure and assessment by a diving medical practitioner Develop and enforce a fatigue risk management system for diving and chamber operations, covering maximum shift lengths, minimum rest breaks, offshore rotation limits, and specific controls for saturation crews and night operations Adopt formal criteria and approval processes for use of breath-holding and free diving in commercial or professional work (e.g. allow inspection tasks, training), including time limits, buddy systems and emergency preparedness Provide psychological support and training for personnel involved in high-stress diving (cave, wreck, overhead, nuclear, underwater criminal investigation, harbour clearance, military and special forces missions) and ensure they can opt out without penalty Establish acclimation and progressive exposure procedures for cold water diving, diving at altitude and ice diving supported by appropriate thermal protection systems and monitoring Train supervisors to recognise signs of medical and psychological distress, decompression sickness symptoms and fitness for work concerns, with clear authority to stand divers down where risk is identified 	
4. Dive Planning, Hazard Identification and Job Safety Analysis	<ul style="list-style-type: none"> Inadequate pre-dive hazard identification for varied work such as aquaculture diving, harbour clearance, maritime security, research diving, underwater photography, inspection, maintenance and underwater criminal investigation Failure to recognise specialised hazards of overhead environment diving, wreck diving, cave diving, swimming through narrow spaces and diving into untested waters 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> Poor assessment of environmental conditions such as currents, visibility, water temperature, tides, surf, ice conditions and vessel traffic for offshore and near-shore operations Lack of systematic differentiation between routine diving and high-risk tasks such as underwater blasting, cutting and welding, pile driving, subsea drop testing and nuclear diving Inadequate consideration of altitude, depth, repetitive diving, decompression stop diving and test depth diving in planning decompression strategies Insufficient integration of research or police operational requirements with WHS risk controls, leading to unsafe compromises in dive plans No formal process to halt unnecessary diving where risk is disproportionate to operational benefit 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
5. Decompression Management, Gas Planning and Physiological Risk Control	<ul style="list-style-type: none"> Inadequate decompression planning for deep water diving, repetitive dives, saturation diving, mixed gas diving and diving at altitude Over-reliance on dive computer decompression software without verification against tables or organisational rules Incorrect use of PADI RDP training principles and decompression tables for commercial profiles not suited to recreational algorithms Nitrogen narcosis, oxygen toxicity, carbon dioxide retention and inert gas loading mismanaged due to poor gas planning and monitoring Inadequate procedures for nitrox blending, trimix blending and gas analysis leading to incorrect gas mixtures being used Lack of structured management of decompression sickness incidents, 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<p>including in-water recompression, therapeutic recompression and hyperbaric treatment</p> <ul style="list-style-type: none"> • Insufficient control of breath-holding/free diving practices in combination with scuba or surface supplied diving, increasing risk of lung barotrauma and decompression stress 		[REDACTED]	
6. Diving and Hyperbaric Equipment Procurement, Configuration and Maintenance	<ul style="list-style-type: none"> • Procurement of diving, surface supplied and saturation equipment that does not meet relevant Australian Standards or is unsuitable for intended commercial and professional activities • Inadequate maintenance systems for critical life-support equipment including regulators, rebreathers, bailout systems, dive computers, masks, dry suits, hot-water suits and communications • Improper configuration of technical diving gear such as stage cylinders, rebreathers, mixed gas systems and bailout rigs for deep, wreck, cave and overhead environment work • Failure of surface supplied systems, umbilicals, helmet and hat diving equipment and associated communications due to inspection, maintenance or configuration control • Lack of formal management of changes to equipment type, configurations, software versions and firmware for dive computers and monitoring systems • Inadequate maintenance and inspection of hyperbaric chambers, saturation systems, life support systems, emergency gas supplies and associated control systems • Improper storage, handling and transport of cylinders, high-pressure gases, nitrox/trimix blends, and explosives used in underwater blasting and demolition 	4A	[REDACTED]	2M

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7. Vessels, Platforms, Access and Logistics Management	<ul style="list-style-type: none"> • Poorly controlled loading of dive boats and support vessels, including cylinders, lift bags, explosives, tools, cranes and drilling equipment • Insufficient vessel stability and deck layout design for safe diver entry, exit, gear donning/de-kitting and manual handling in rough conditions • Inadequate integration of vessel navigation and WHS controls in busy harbours, ports and offshore locations used for harbour clearance, maritime security and offshore diving • Lack of safe systems of work for use of cranes, A-frames, moonpools and other launch and recovery systems in subsea drop testing, underwater pile driving and offshore diving • Poor planning for remote and offshore logistics including fuel, spares, emergency equipment, communications, and medical support • Failure to manage the interface between vessel operators, diving contractors and other PCBUs regarding responsibilities and emergency response 	3H	<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
8. Work Environment, Water Quality and Biohazard Management	<ul style="list-style-type: none"> • Exposure to contaminated or polluted water during harbour clearance diving, underwater criminal investigations, nuclear diving, aquaculture diving and maintaining underwater exhibits • Biological hazards from marine life (e.g. sea urchin diving, lobster diving, aquaculture pests, stings, bites, infections) and biofouling on underwater structures • Poor control of biohazard diving activities, including work involving sewage, medical waste, carcasses or contaminated sediments 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> • Insufficient assessment of nuclear, radiological or chemical hazards in specialised nuclear diving environments • Inadequate management of water temperature extremes, including cold water diving and ice diving, leading to hypothermia or cold stress • Unassessed hazards associated with diving into untested waters, such as submerged obstacles, entanglement risks and unknown contamination 		[REDACTED]	
9. High-Risk and Specialised Diving Activities Management	<ul style="list-style-type: none"> • Lack of specific system controls for complex diving such as cave diving, wreck diving, overhead environment diving, swimming through narrow spaces and overhead environment isolation • Inadequate planning and controls for saturation diving, saturation system maintenance and deep sea/offshore diving activities • Poor governance of underwater blasting, underwater demolition, underwater cutting, welding, underwater drilling and underwater pile driving • Insufficient risk controls for military, special forces and police diving where operational imperatives may pressure WHS decision-making • Inadequate systems for night diving, low visibility diving, high current diving and diving at altitude • Overextension of recreational methods and equipment into technical and commercial environments (e.g. using recreational standards for deep technical or mixed gas diving) 	4A	[REDACTED]	2M
10. Communications, Signals and Situational Awareness Systems	<ul style="list-style-type: none"> • Failure or absence of reliable communications between divers and surface support during commercial, police, military, aquaculture and research diving operations 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Lack of training or adherence to diving signals, including line signals, light/torch signals for night and low visibility diving and hand signals Poor situational awareness in complex environments such as wrecks, caves, overhead structures and construction sites with cranes and pile driving Inadequate procedures for lost diver, lost line, entanglement or out-of-gas scenarios in low visibility or high current conditions Insufficient marking and monitoring of dive sites in areas with vessel traffic, including harbours and offshore work sites Absence of effective communication protocols during emergency events in saturation systems, hyperbaric chambers and underwater blasting operations 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
11. Emergency Preparedness, Rescue and Hyperbaric Incident Response	<ul style="list-style-type: none"> Inadequate emergency response planning for diver rescue, emergency surface ascents, uncontrolled buoyant ascents and entrapment scenarios Lack of effective on-site rescue capability for overhead environment, wreck, cave, under-ice and confined space diving environments Insufficient capacity and procedures for hyperbaric emergencies, including chamber fire, rapid decompression, medical emergencies during treatment and power failure Poor coordination with external emergency services for offshore, remote and nuclear diving sites No structured approach to emergency recall and stand-down of diving operations during severe weather, vessel emergencies or site security events 	4A	<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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			[REDACTED]	
12. Information Management, Documentation and Record Keeping	<ul style="list-style-type: none"> • Incomplete or inaccurate recording of dive profiles, gas mixes, decompression schedules and incidents, impeding analysis of decompression sickness and other events • Poor documentation of maintenance, inspections and testing for diving and hyperbaric equipment, including saturation systems and chambers • Loss or fragmentation of training, competency and medical records for divers and support staff • Inadequate version control for dive plans, procedures, decompression tables, decompression software configurations and emergency plans • Failure to capture and share lessons learned from incidents, near misses and industry alerts across all teams and sites 	3H	[REDACTED]	1L
13. Behavioural Safety, Culture and Operational Discipline	<ul style="list-style-type: none"> • Normalisation of deviations, where divers and supervisors routinely accept shortcuts to decompression, gas planning or equipment checks • Production or mission pressure overriding WHS controls in commercial, military, special forces, police and research diving operations • Poor reporting culture, with divers reluctant to report near misses, decompression symptoms, equipment failures or breaches of procedure • Inconsistent adherence to buddy systems, checklists, pre-dive briefings and post-dive debriefings • Complacency in routine tasks such as aquaculture diving, maintaining underwater exhibits or repetitive harbour clearance diving 	3H	[REDACTED]	2M

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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.