

Emergency Towing Accident Recovery and Roadside Safety

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. Governance, WHS Duties and Safety Leadership	<ul style="list-style-type: none"> PCBU and Officers not clearly understanding due diligence obligations under WHS Act 2011 for emergency towing operations Absence of a documented WHS management plan specific to towing and accident recovery activities Inadequate resourcing of WHS (time, budget, competent people) leading to systemic gaps Lack of visible safety leadership and poor safety culture tolerating shortcuts during urgent callouts Failure to consult with workers and health and safety representatives about emergency recovery risks Inadequate monitoring and review of WHS performance indicators (e.g. near misses, incidents on roadside, rigging failures) 	4A	<ul style="list-style-type: none"> Develop and implement a documented WHS management System (WHSMS) aligned with WHS Act 2011, WHS Regulations and relevant Codes of Practice for road transport and vehicle loading Define and document WHS roles, responsibilities and accountabilities for Officers, managers, dispatchers, drivers and recovery personnel, including emergency towing duties Provide WHS due diligence training for Directors and senior managers, with specific focus on high-risk roadside and accident recovery activities Establish and communicate a safety leadership charter that prioritises stopping work if conditions become unsafe (e.g. high-speed traffic, unstable wrecks, fire risk) Implement regular WHS consultation forums, toolbox talks and safety committee meetings focused on lessons learned from towing incidents and near misses Set measurable WHS objectives and targets (e.g. reduction in near misses during emergency callouts, compliance with load restraint standards) and review quarterly Conduct annual independent WHS audits of towing and roadside recovery operations and implement corrective action plans 	3H
2. Regulatory Compliance, Licensing and Permits	<ul style="list-style-type: none"> Non-compliance with WHS Act 2011 and WHS Regulations for high risk activities around roads and plant Tow truck operators or drivers not holding required licences, permits or tow authorities Failure to comply with road traffic heavy vehicle and towing regulations when recovering damaged or non-standard vehicles Inadequate systems to monitor changes in legislation, Australian Standards and manufacturer requirements for towing and load restraint Missing or non-current permits for oversize, over-mass or unusual recovery operations 	3H	<ul style="list-style-type: none"> Maintain a legal register covering WHS, road transport, towing, heavy vehicle, fatigue and environmental legislation applicable to emergency towing and roadside recovery Implement a licence and competency management system that records driver and operator licences, high-risk work licences (where applicable), training and expiry dates with automated alerts Develop procedures for verifying licence currency and permit requirements before allocating complex tows (e.g. heavy vehicle rollover, over-dimension recovery) Align towing and load restraint practices with relevant Australian Standards and the Heavy Vehicle National Law, and include these in internal procedures and training Undertake periodic compliance audits (paperwork and field observations) against regulatory requirements, including inspection of licences, permits and tow documentation Establish a process to review legislative updates at least annually and incorporate changes into policies, procedures, and training materials 	2M
3. Fleet Selection, Design and Engineering Controls	<ul style="list-style-type: none"> Tow trucks not designed or suitably configured for emergency accident recovery tasks (e.g. insufficient capacity, 	4A	<ul style="list-style-type: none"> Specify and procure tow trucks and recovery equipment based on a documented engineering risk assessment covering maximum loads, boom reach, stability, and emergency recovery scenarios 	2M

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	<ul style="list-style-type: none"> stability issues when operating hydraulic booms) Lack of engineered controls for working around live traffic (e.g. inadequate beacons, arrow boards, lighting) Inadequate guarding or interlocks on hydraulically operated booms, winches and tilt trays leading to crush or entanglement risks Tow vehicles without appropriate rated recovery points, winches, or anchoring systems for dragging cars from difficult positions Insufficient consideration of ergonomic design causing high manual handling loads during rigging and equipment handling 		<ul style="list-style-type: none"> Ensure all towing vehicles meet or exceed ANCAP 5-star safety ratings where available, and are fitted with advanced braking, stability control and driver assist technology as standard Fit tow trucks with compliant flashing beacons, wipers, lights, rear and side lighting, conspicuity markings, traffic arrow boards and rear-facing cameras to improve roadside safety Incorporate engineered safety features such as emergency stop controls, interlocks on hydraulic booms and winches, load-holding valves, and guarding over pinch points Standardise fit-out to include rated recovery points, anchor points, tow bars, chains, slings and spreader bars clearly marked with Working Load Limits (WLL) Involve operators, WHS advisers and engineers in purchase design reviews to identify ergonomic and safety improvements (e.g. low height tool storage, mechanical aids for chains and rigging equipment) 	
4. Vehicle Inspection, Maintenance and Pre-Start Systems	<ul style="list-style-type: none"> Inadequate preventive maintenance regime leading to hydraulic failures, brake issues or steering faults during emergency towing Winches, cables, chains and lifting slings not regularly inspected leading to failure while dragging or lifting damaged vehicles Hydraulically controlled booms or trays operating with worn seals or malfunctioning controls causing uncontrolled movements Lack of formal pre-start inspection processes for tow trucks and recovery equipment Unrecorded defects or failure to remove defective equipment from service 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M
5. Competency, Licencing and Training Systems	<ul style="list-style-type: none"> Tow operators lacking specific training in emergency towing, accident scene management and dragging vehicles from complex positions Inadequate competency in operating hydraulically controlled booms, winches and rigging of damaged vehicles 	4A	<p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> Insufficient understanding of vehicle construction (e.g. EVs, hybrids, high-strength steel) leading to unsafe recovery methods or further damage Absence of structured induction and refresher training for roadside work near live traffic and high-risk crash scenes Informal, on-the-job learning without documented competency assessments 		[REDACTED]	
6. Journey Management and Emergency Callout Planning	<ul style="list-style-type: none"> Unplanned or rushed responses to emergency towing callouts resulting in speeding, fatigue or poor route selection Inadequate assessment of scene conditions (traffic volume, weather, lighting, terrain) before dispatching suitable vehicle and crew No documented journey management process for long-distance or after-hour emergency recoveries Pressure from client, insurers or police to attend multiple urgent callouts without considering driver fatigue or vehicle capability Failure to define escalation and standby arrangements for complex accident scenes (e.g. rollovers, vehicles off embankments) 	4A	[REDACTED]	2M
7. Fatigue, Hours of Work and after-Hours Response Management	<ul style="list-style-type: none"> Operators undertaking extended hours on call combined with daytime duties leading to cumulative fatigue Inadequate systems for monitoring work and rest hours for tow truck drivers, particularly for unplanned emergency callouts Cultural expectations to accept every job offered, resulting in operators working when overtired 	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> No formal fatigue risk management plan for night work, early starts, or back-to-back emergency recoveries Lack of training for supervisors in recognising fatigue indicators and intervening 		[REDACTED]	
8. Roadside Traffic Management and Scene Safety Systems	<ul style="list-style-type: none"> Tow operators working within live traffic lanes without adequate traffic control or warning devices Lack of standardised procedures for positioning tow trucks to shield workers during accident recovery and rigging Insufficient coordination with police, fire and road authorities at crash scenes, leading to conflicting directions and unsafe exposures Inadequate controls for work on high-speed roads, multi-lane roads and blind corners during emergency recoveries Failure to consider secondary impact risks when dragging vehicles from awkward positions into carriageways 	4A	[REDACTED]	2M
9. Rigging, Load Restraint and Vehicle Recovery Planning	<ul style="list-style-type: none"> Improper selection or configuration of chains, slings, shackles and recover points when rigging damaged vehicle Dragging cars from ditches, embankments or confined spaces without adequate consideration of load path, anchor points and structural integrity of the casualty vehicle Failure to manage dynamic loads during winching, tilting and boom operation leading to sudden release or rollover of the vehicle Inadequate systems for planning non-standard or complex recoveries, such as multi-vehicle collisions or vehicles with missing wheels Lack of documented load restraint and rigging procedures leading to 	4A	[REDACTED]	2M

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	inconsistent practices between operators		[REDACTED]	
10. Operation of Hydraulic Systems, Winches and Booms	<ul style="list-style-type: none"> Uncontrolled or unexpected movement of hydraulically controlled booms, tilt trays or underlifts due to system faults or incorrect operation Winch line failure or recoil during dragging of damaged vehicles from difficult positions Hydraulic leaks causing fire hazards, slips, or environmental contamination Absence of standardised operating procedures for complex boom and winch manoeuvres during emergency recoveries Inadequate lock-out or isolation procedures during maintenance and repair of hydraulic systems 	4A	[REDACTED]	2M
11. Damaged Vehicle Handling, Stability and Further Damage Prevention	<ul style="list-style-type: none"> Moving structurally compromised vehicles resulting in collapse, secondary damage or release of components Inappropriate attachment points causing additional damage to other vehicles or compromised load security during towing Unsecured loose parts, glass or debris falling from damaged vehicles during towing or dragging operations Inadequate identification and control of vehicle-specific hazards such as undeployed airbags, fuel leaks, EV battery damage or sharp edges No consistent process for assessing whether a vehicle is safe to tow, drag or requires alternative recovery methods 	3H	[REDACTED]	2M
12. Communications, Navigation and Remote/Isolated Work	<ul style="list-style-type: none"> Inability to contact operators during emergency callouts in remote or low-coverage areas 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Poor quality or unclear instructions from dispatch leading to delays or increased exposure at dangerous scenes Lack of a monitored check-in/check-out system for after-hours and remote accident recoveries No redundancy in communication channels if primary systems fail during critical towing or dragging operations Insufficient location tracking leading to delays in emergency assistance if an incident occurs 		[REDACTED]	
13. Incident, Near Miss and Vehicle Damage Reporting and Investigation	<ul style="list-style-type: none"> Under-reporting of near misses during emergency towing and accident recovery, leading to repeated systemic failures Lack of structured process to capture incidents of further vehicle damage caused during towing or dragging operations Inadequate root cause analysis of incidents related to roadside safety, rigging or hydraulic operation Failure to meet statutory requirements for notifiable incidents under WHS Act 2011 No feedback loop from investigations into training, procedures and equipment improvements 	3H	[REDACTED]	2M
14. Contractor, Subcontractor and Third-Party Management	<ul style="list-style-type: none"> Use of subcontracted tow operators who do not meet the organisation's WHS standards for emergency towing and recovery Inadequate prequalification of contractors regarding licences, training, insurance and equipment capability Poor coordination with third-party traffic controllers, recovery specialists or repairers at complex accident scenes 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Lack of clarity on control of the workplace and safety responsibilities when multiple PCBUs are involved Insufficient monitoring of subcontractor performance and incident history 		[REDACTED]	
15. Personal Protective Equipment and Equipment Standardisation (System Level)	<ul style="list-style-type: none"> Inconsistent PPE standards between operators leading to variable protection at roadside and crash scenes Reliance on PPE as the primary control rather than part of a broader hierarchy of controls No system to ensure PPE suitability for night work, wet conditions or work around broken glass and sharp metal Failure to maintain PPE in serviceable condition or to replace it at appropriate intervals Variation in standard equipment carried on tow trucks, causing improvisation at emergency scenes 	3H	[REDACTED]	1L
16. Emergency Preparedness, Rescue and First Aid Arrangements	<ul style="list-style-type: none"> Inadequate planning for operator injury, vehicle fire or secondary operations during roadside recovery operations Lack of clear procedures for responding to vehicle fire, fuel, oil spills, or EV battery thermal events during towing and dragging Insufficient first aid equipment or trained first aiders available during after-hours emergency towing No structured process for emergency evacuation or temporary cessation of operations when conditions become unsafe Poor coordination with external emergency services in the event of an incident involving tow operators 	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/factsheets-and-resources/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.