Lead Paint Removal Management

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

THIS RISK ASSESSMENT IS APPROVED BY THE PCBU OF THE 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:

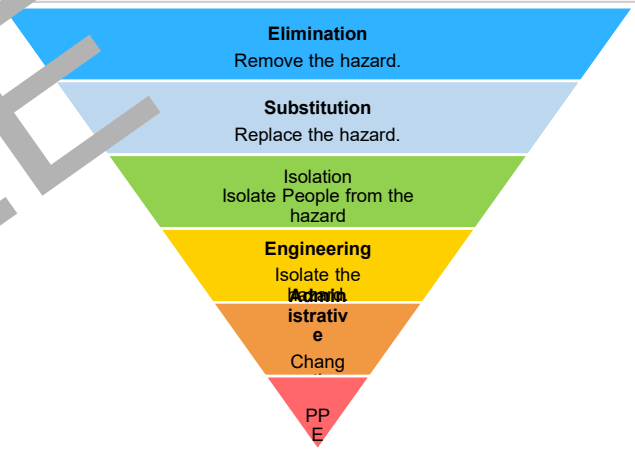
CLIENT OR PRINCIPAL CONTRACTOR DETAILS

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
ALMOST CERTAIN	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4 ACUTE		
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED
POSSIBLE	1 LOW	2 MODERATE	3 HIGH	4 ACUTE	4 ACUTE	3H HIGH	Rev before work
UNLIKELY	1 LOW	1 LOW	2 MODERATE	3 HIGH	4 ACU	2M MO RATE	Ensure control measures in place.
RARE	1 LOW	1 LOW	2 MODERATE	3 HIGH	3 H	1L LOW	Monitor and keep records.

HIERARCHY OF CONTROLS



Risk Rating & Required Action:

4A	Stop work. The risk is intolerable. E inate the hazar redesign the activity before proceeding. A Safe Work Method Statement (SWMS) or hi er-level authorisati is required.
3H	Review and approve additional c rols b ask arts. Senior supervisor sign-off needed.
2M	Ensure all nominated controls are in ace and effe ive. 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 & Duty of Care	• Lack of clear WHS governance structure for lead paint removal projects • Failure to identify and comply with WHS Act 2011, WHS Regulations and relevant Codes of Practice (e.g. Managing Risks of Hazardous Chemicals, Lead Risk Work) • Inadequate understanding of PCBUs' primary duty of care and officers' due diligence obligations • No formal process to review changes to legislation, Australian Standards or guidance on lead management • Poor allocation of resources for WHS (budget, time, competent persons) resulting in unmanaged systemic risks • Inadequate consultation with workers and health and safety representatives (HSRs) regarding lead-related hazards • Lack of documented lead management policy and project-specific WHS objectives	4A	• Establish a WHS governance framework defining roles, responsibilities and due diligence requirements for officers in relation to lead paint removal management • Develop and maintain a documented Lead Management Policy and supporting procedures that align with the WHS Act 2011, WHS Regulations and Safe Work Australia Codes of Practice • Implement a legal and standards register for hazardous chemicals and lead risk work, with scheduled six-monthly reviews and documented updates communicated to management and supervisors • Ensure competent WHS advisors or hygienists are engaged to interpret legislation and technical guidance for lead-based paint removal projects • Include lead management requirements in the organisation's WHS management system and integrate them into project planning and procurement processes • Establish formal WHS consultation mechanisms (HSR forums, toolbox meetings, pre-start briefings) with documented minutes addressing lead hazards and controls Require annual WHS governance reviews and internal audits focusing on lead-related projects, with corrective actions tracked to completion Ensure WHS responsibilities for lead control (e.g. exposure monitoring, health surveillance, licensing, notifications to the regulator where required) are clearly assigned and documented	2M
2. Lead Hazard Identification, Surveys & Risk Classification	• Failure to identify presence, location and condition of lead-based paint before works commence • Reliance on assumptions instead of documented lead surveys and sampling by competent persons • Incomplete or outdated hazardous materials (hazmat) registers for existing buildings and structures • Incorrect classification of work as non-lead risk work when exposure could exceed regulatory thresholds • No process for reassessing risks when scope changes (e.g. additional surfaces, higher disturbance methods) • Failure to identify secondary lead contamination in dust, soil and adjacent structures	4A	• Implement a formal pre-project lead hazard identification procedure requiring surveys of all suspected lead-based paint areas by a competent person • Maintain a site-specific hazardous materials register that clearly records all known or assumed lead-based coatings, condition (intact, peeling, friable) and locations • Require laboratory analysis of representative paint samples to confirm lead content and inform control measures where there is any doubt • Adopt a conservative default assumption that pre-1970s paints may contain lead unless proven otherwise by testing • Establish criteria and a documented process for classifying work as lead risk work in line with WHS Regulations (e.g. potential for significant airborne lead or high exposure tasks) • Require review and update of the hazmat register and risk assessment whenever project scope, methodology or surfaces to be treated change • Include adjacent rooms, soil, voids, plant and equipment in the survey to identify potential secondary contamination pathways • Record survey outcomes in a central document management system accessible to project managers, supervisors and workers	2M

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	• Inadequate documentation of substrates, coatings, and lead concentrations for planning control measures			
3. Project Planning, Method Selection & Design of Controls	• Inadequate planning phase leading to selection of high-risk removal methods (e.g. uncontrolled dry sanding, abrasive blasting) without appropriate engineering controls • Failure to consider hierarchy of control when choosing lead paint removal methods • Insufficient time allowed in the programme for safe set-up, decontamination and air monitoring • Poor integration of WHS requirements into project budget, leading to cost-driven reduction of controls • Lack of specialist input (e.g. occupational hygienist, engineering, ventilation expertise) in planning stage • Incompatibility between chosen method and building occupancy, ventilation, or surrounding sensitive receptors (schools, hospitals, waterways) • Failure to pre-plan contingency arrangements for control failures (e negative pressure loss, power outage, containment breach)	4A	• Require a formal project WHS planning workshop for all lead paint removal projects involving project management, supervising hygienist and key subcontractors • Establish a documented method selection guideline that applies the hierarchy of controls to lead paint removal (elimination, substitution, isolation, engineering, administrative, PPE) • Mandate documented comparison of alternative techniques (e.g. chemical stripping, wet scraping, encapsulation, controlled blasting) based on exposure risk, waste volume, and feasibility • Include sufficient time and budget in project planning for design, installation and verification of engineering controls (containment, ventilation, filtration, negative pressure monitoring) • Require review and endorsement of proposed removal methodology and control design by a competent occupational hygienist before work starts • Integrate local environmental and community constraints into method selection, including noise, dust and potential off-site lead contamination risks • Develop documented contingency plans addressing loss of power, ventilation failure, weather events, and emergency evacuations while maintaining containment integrity • Incorporate requirements for air monitoring, surface wipe testing and clearance criteria into the project execution plan	2M
4. Contractor, Subcontractor & Supplier Management	• Engagement of contractors who lack experience or competency in lead-based paint removal • Inadequate prequalification processes for assessing WHS systems and historical performance in hazardous materials work • Poorly defined scopes of work resulting in gaps in responsibility for containment, decontamination, monitoring or waste transport	4A	[redacted]	2M

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	• Inconsistent safety standards between principal contractor and subcontractors • Failure to ensure suppliers provide compliant plant, RPE, containment materials and certified filtration systems • Inadequate monitoring of contractor compliance with agreed WHS management plans and procedures • Lack of clear communication channels and escalation paths for safety issues between PCBUs		[redacted]	
5. Competency, Training & Worker Information	• Workers and supervisors not competent in recognising lead hazards and understanding exposure pathways • Insufficient training on specific lead control procedures, containment requirements and decontamination protocols • Lack of understanding of health effect of lead (neurological, reproductive, chronic impacts) leading to complacen • Supervisors unable to enforce system due to limited technica owledge of lead regulations an controls • Inadequate induc n for ne short-term workers lead wo areas • No formal verification of compet cy or refresher training program high-risk hazardous materials work • Language or literacy barriers preventing workers from comprehending procedures and signage	4A	[redacted]	2M
6. Plant, Equipment & Engineering Controls Management	• Inadequate selection and maintenance of ventilation, extraction and filtration systems resulting in ineffective lead dust control • Failure of negative pressure systems or local exhaust ventilation due to poor design, overload or lack of monitoring	4A	[redacted]	2M

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	• Use of inappropriate plant (e.g. non-HEPA vacuums, uncontrolled grinders) that generates excessive airborne lead • Insufficient inspection, testing and tagging of electrical plant used in containment areas • Lack of documented maintenance programs for RPE, compressors, extraction units and decontamination showers • Equipment breakdowns causing sudden loss of controls and potential uncontrolled release of lead dust • Improvised or substandard containment structures prone to collapse or leakage		[redacted]	
7. Containment, Segregation & Site Access Control	• Inadequate physical containment allowing lead dust to migrate into occupied or public areas • Poor zoning, with no clear separation between clean, buffer and contaminated areas • Uncontrolled access by other trades, clients or the public into lead-affected zones • Failure to manage pressure differentials and airflow between zones • Lack of robust controls on doors, entry points and material transfer passages • Insufficient signage and barriers to warn of lead contamination and required precautions • Spread of lead contamination via lifts, stairwells, corridors or external scaffolds	4A	[redacted]	2M
8. Personal Protective Equipment & Respiratory Protection Program	• Absence of a structured respiratory protection program for lead work • Use of incorrect or inadequate RPE types or protection factors for measured or expected airborne lead levels	3H	[redacted]	1L

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	• Lack of fit testing, training and medical assessment leading to ineffective RPE use • Poor PPE management (cleaning, storage, replacement) causing cross-contamination and reduced protection • Over-reliance on PPE instead of higher-order controls in the hierarchy • Insufficient guidance on donning, doffing and decontaminating PPE in lead environments • Inconsistent enforcement of PPE use due to cultural or supervisory weaknesses		[redacted]	
9. Occupational Hygiene Monitoring, Health Surveillance & Exposure Management	• Failure to undertake baseline and ongoing air monitoring to verify adequacy of controls • Inadequate interpretation of hygiene monitoring results, leadin continuation of unsaf practices • No system to ide fy when work meets regulatory triggers lead wor nd associated health sur illance • Delayed or absent biological monitoring (blood lead le ls) f workers performing lead risk work • Lack of process to remove or restrict workers exceeding biological exposure standards or investigation levels • Poor communication of monitoring results to workers and management, undermining trust and behaviour change • Inadequate recordkeeping of exposure data for long-term health management and regulatory compliance	4A	[redacted]	2M

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10. Decontamination, Cleaning & Housekeeping Systems	• Inadequate decontamination facilities resulting in transfer of lead dust to clean areas, vehicles and homes • Poor housekeeping leading to accumulation of lead dust on surfaces, scaffolds and plant • Use of unsuitable cleaning methods (dry sweeping, compressed air) that resuspend lead dust • Insufficient separation between dirty and clean change areas, increasing exposure and cross-contamination • Failure to define cleaning responsibilities and frequencies, resulting in inconsistent practices • Improper management of reusable tools and equipment leading to chronic contamination • Lack of documented clearance criteri prior to reoccupation of areas	4A	[redacted]	2M
11. Lead Waste Management, Transport & Disposal	• Misclassification lead-cont ted waste resulting in i ate han g or disposal routes • Inadequate systems for collecti packaging and labelling paint debris and contaminated consumables • Spillage or leakage of waste during internal transfer or off-site transport • Failure to comply with environmental and waste tracking regulations for hazardous waste • Insufficient training of waste handlers and transport operators in lead contamination risks • Cross-contamination of non-hazardous waste streams due to poor segregation	3H	[redacted]	1L

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	• Lack of documented verification of final disposal at licensed facilities		[redacted]	
12. Building Occupant, Public & Environmental Protection	• Insufficient systems to protect building occupants, neighbours and the public from airborne or settled lead contamination • Failure to communicate planned works and residual risks to building managers and tenants • Lead migration into soil, stormwater systems or waterways from external works • Inadequate scheduling of works in occupied premises leading to unplanned exposure scenarios • Poor management of shared services (HVAC systems, ducting) resulting in spread of lead dust beyond work area • Inadequate response to community concerns or complaints regarding dust, noise or odours	4A	[redacted]	2M
13. Documentation, Recordkeeping & Information Management	• Incomplete or inaccurate WHS documentation for lead paint removal projects • Loss of critical records such as exposure data, health surveillance results, training records and clearance certificates • Out-of-date procedures and plans remaining in circulation and being used on site • Lack of version control leading to confusion over current requirements • Inability to demonstrate compliance to regulators or clients due to poor recordkeeping systems	3H	[redacted]	1L

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	• Inadequate confidentiality controls for sensitive health information		[redacted]	
14. Emergency Preparedness, Incident Management & Spill Response	• Lack of emergency response procedures addressing containment breach, fire, medical events or major spills involving lead-contaminated materials • Poor integration of lead-specific risks into site emergency plans and drills • Inadequate availability or training in use of spill kits and emergency containment materials • Failure to manage incident scenes in a way that prevents further lead contamination or exposure • Delayed notification to regulators or other PCBUs where notifiable incidents occur • Insufficient investigation of lead-relat incidents, resulting in repeat failures	3H	[redacted]	1L
15. Audit, Inspection, Review & Continuous Improvement	• Absence of system ic audits and inspections to veri mplementation of lead management ntrols • Complacency over time leading to erosion of standards and informal workarounds • Failure to capture and act on lessons learned from previous projects or incidents • Limited involvement of senior management in reviewing lead-related WHS performance • Inadequate worker feedback mechanisms to identify practical issues with existing systems • Over-reliance on paperwork reviews without validating conditions in the field	3H	[redacted]	1L

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			[redacted]	
16. Interface Management with Other Trades, Tenants & PCBUs	• Poor coordination between lead removal activities and other construction or maintenance work on site • Other trades inadvertently disturbing lead paint or contaminated dust due to lack of information • Conflicting work schedules causing overcrowding or compromised containment areas • Inconsistent safety expectations and procedures between different PCBUs at the same workplace • Failure to manage shared facilities (amenities, access routes) leading to cross-contamination • Communication breakdowns about changes in scope, methods or containment boundaries	3H	[redacted]	1L

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

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-of-codes-of-practice

Northern Territory
Work Health and Safety (National Uniform Legislation) Act 2011
Work Health and Safety (National Uniform Legislation) Regulations 2011
Legislation NT: https://worksafe.nt.gov.au/laws-and-compliance/workplace-safety-laws
Codes of Practice NT: https://worksafe.nt.gov.au/forms-and-resources/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

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.

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

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

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

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