

Lead-based Paint

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 PCBU's Duties	<ul style="list-style-type: none"> Failure to recognise work as lead-risk work under WHS Regulations (e.g. WHS Regulation 2011, Part 7.2 – Lead) Inadequate understanding of due diligence duties by officers and PCBUs regarding lead exposure and contamination control Absence of a documented WHS management system specifically addressing lead-based paint and lead-containing materials Poor integration of lead-related controls into existing WHS policies, risk registers and consultation arrangements Non-compliance with notification requirements to the WHS regulator for lead-risk work Lack of clarity over legal responsibilities between client/PCBU, principal contractor and subcontractors for lead controls 	High	<ul style="list-style-type: none"> Establish and maintain a WHS governance framework that explicitly incorporates lead-based paint and lead-containing materials, aligned with the WHS Regulation 2011 and WHS Regulation 2011 (including Part 7.2 – Lead and relevant construction provisions) Develop a site- and organisation-wide Lead Management Procedure that defines what constitutes lead-risk work, responsibilities of PCBUs, officers, workers and health and safety representatives, and interfaces between multiple duty holders Maintain a legal register identifying all applicable lead-related legislation, codes of practice, Australian Standards and guidance (e.g. Safe Work Australia 'Managing risks of lead in the workplace' code) and review it at least annually Require officer-level due diligence processes (e.g. WHS governance meetings, periodic compliance audits) to specifically review performance against lead-related legal obligations, including licensing, notifications and health monitoring Implement a documented process to identify, classify and notify lead-risk work to the WHS regulator where required, including clear triggers, responsible roles and record-keeping requirements Ensure contracts, tenders and service agreements clearly allocate WHS responsibilities for lead management between client, principal contractor and subcontractors, including requirements for systems, training, and reporting Integrate lead-related risks into the organisation's enterprise risk management framework and WHS risk registers, with defined risk owners, review dates and performance indicators Consult with workers and health and safety representatives on the development and review of lead management policies and procedures, and document outcomes in consultation records 	Medium
2. Asset, Site and Materials Identification and Assessment	<ul style="list-style-type: none"> Unknown presence, location and concentration of lead-based paint, lead-containing coatings and residues (dust, debris, contaminated soil) Reliance on assumptions or visual inspection only, without proper sampling and analysis for lead content Incomplete or inaccurate asset registers and building histories, leading to unrecognised legacy lead risks Failure to identify secondary contamination pathways (e.g. air handling systems, adjacent tenancies, common areas, vehicles and tools) Inadequate assessment of environmental and off-site receptors (neighbours, schools, waterways) for potential lead contamination 	High	<ul style="list-style-type: none"> Establish a formal Lead-Containing Materials (LCM) and Lead-Based Paint Identification Procedure requiring structured pre-work surveys for buildings, plant, equipment and infrastructure likely to contain lead-based coatings or residues Develop and maintain a verified lead materials register for each site that identifies locations, conditions, lead concentration (where known), and risk ratings, and ensure it is accessible to workers, contractors and supervisors Engage competent persons (e.g. occupational hygienists or suitably qualified assessors) to undertake lead sampling, laboratory analysis and risk assessment where the presence or concentration of lead is uncertain Incorporate historical information (construction age, previous industrial use, prior remediation works) into the hazard identification process to flag likely lead-based paint or residue locations Require documented pre-work assessments to include mapping of potential contamination pathways such as ventilation systems, access routes, adjoining properties, drainage, waste transfer routes and shared facilities Mandate baseline environmental and surface contamination monitoring (e.g. wipe sampling, dust loading measurements) where significant disturbance of lead-based paint or residues is planned 	Medium

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	<ul style="list-style-type: none"> Lack of baseline contamination data before starting removal or disturbance activities 		<ul style="list-style-type: none"> Integrate lead identification requirements into design reviews, change management processes and building refurbishment planning, so lead risks are considered early in project scoping Implement a system to review and update the lead materials register following any removal, encapsulation, disturbance or discovery of new lead-containing areas 	
3. Procurement and Contractor Management	<ul style="list-style-type: none"> Engagement of contractors or suppliers without adequate competence or systems to manage lead-based paint and lead residues Procurement decisions driven solely by lowest price without consideration of WHS or lead management capabilities Use of inappropriate removal products, tools or equipment that increase generation of lead dust and fumes Lack of contractual requirements for contractor WHS management plans and lead-specific risk assessments Inadequate verification of contractor licences, certifications, and health monitoring systems for lead-risk work Poor coordination of multiple contractors leading to uncontrolled disturbance of lead-containing materials 	High	<ul style="list-style-type: none"> Embed WHS and lead management capabilities criteria into procurement policies for contractors, consultants, products and equipment associated with lead-paint removal or disturbance of lead-containing materials Require potential contractors to provide evidence of experience, qualifications, licences (where applicable), and documented systems for lead-risk work, including health monitoring and decontamination procedures Include specific clauses in contracts requiring compliance with WHS Act 2011, WHS Regulation 2011 and relevant codes of practice for managing risks of lead, and empowering the PCBU to audit and stop unsafe practices Develop contractor pre-qualification process that assesses lead-related SWMS, risk assessments, training records, respiratory protection programs, and environmental protection measures before engagement Specify minimum equipment and product standards (e.g. preference for low-dust removal methods, HEPA filtered extraction, suitable encapsulants) within purchase specifications and tender documentation Implement a contractor coordination and interface management procedure to ensure that sequencing, isolation and communication arrangements minimise unintended disturbance of lead-based paint by other trades Require contractor submission and approval of a project-specific Lead Management Plan for significant lead works, including dust control, hygiene facilities, waste handling and clearance verification arrangements Establish a performance review process for contractors that includes WHS lead-related indicators such as exposure results, incidents, non-conformances and corrective actions 	Medium
4. Planning, Risk Assessment and Design of Work Methods	<ul style="list-style-type: none"> Inadequate high-level risk assessment for removal or disturbance of lead-based paint, lead-containing materials and lead dust residues Over-reliance on generic SWMS or procedure templates that do not consider specific site conditions or vulnerable receptors Poor planning of work methods leading to unnecessary dry sanding, abrasive blasting or other high-exposure techniques Insufficient consideration of staging, isolation and scheduling to control 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<p>exposure of workers and building occupants</p> <ul style="list-style-type: none"> • Failure to incorporate lead controls into design decisions for refurbishment, demolition or maintenance projects • Lack of clearly defined performance criteria for acceptable dust and surface contamination levels post-work 		[REDACTED]	
5. Information, Training, Competency and Supervision	<ul style="list-style-type: none"> • Workers and supervisors lacking awareness of health risks associated with lead dust, fumes and residues • Inadequate competency in identifying lead-containing materials and recognising lead-risk work • Poor understanding of organisational procedures for hygiene, decontamination, exposure control and waste segregation • Incorrect use, maintenance or selection of respiratory protective equipment (RPE) and other PPE • Insufficient supervision of inexperienced workers or subcontractors conducting lead-related tasks • Failure to provide information to neighbouring businesses, occupants or the public about lead-related activities where relevant 	High	[REDACTED]	Medium

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6. Exposure Monitoring, Health Monitoring and Medical Management	<ul style="list-style-type: none"> • Unrecognised elevated blood lead levels in workers due to lack of systematic health monitoring • Infrequent or poorly planned personal exposure monitoring leading to inaccurate understanding of risk • Absence of clear criteria and procedures for removal from lead-risk work when exposure standards are exceeded • Inadequate communication of monitoring results and implications to workers and management • Mismanagement of sensitive health data and privacy related to health monitoring records • Failure to review work methods and controls when monitoring indicates elevated exposures or trends 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium
7. Engineering Controls, Ventilation and Containment Systems	<ul style="list-style-type: none"> • Inadequate design, installation or maintenance of engineering controls used to manage lead dust, fumes and residues • Reliance on PPE rather than higher-order controls such as isolation, ventilation and on-tool extraction • Poorly designed containment (e.g. sheeting, enclosures) allowing migration of lead-contaminated dust to adjacent areas • Failure of ventilation systems to maintain appropriate negative pressure in lead work areas • Insufficient inspection, testing and tagging of vacuums, extraction units and filtration systems (e.g. HEPA filters) 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<ul style="list-style-type: none"> Inappropriate modification or shut-down of building HVAC systems that inadvertently spread lead dust 		[REDACTED]	
8. Hygiene Facilities, Decontamination and Housekeeping Systems	<ul style="list-style-type: none"> Inadequate organisational systems for preventing ingestion of lead via contaminated hands, clothing, tools or surfaces Insufficient or poorly managed wash, change and eating facilities for workers in lead work areas Lack of structured procedures for decontaminating workers, PPE, tools and reusable equipment Inadequate housekeeping regimes leading to accumulation of lead-contaminated dust in work and adjacent areas Workers taking contaminated clothing, footwear or personal items home, leading to secondary exposure of families Food and drink consumption or smoking occurring in contaminated areas due to poor facility planning or enforcement 	High	[REDACTED]	Medium
9. Environmental Protection, Waste Management and Off-Site Impacts	<ul style="list-style-type: none"> Uncontrolled release of lead-contaminated dust, debris or wash water to the external environment (soil, stormwater, waterways) Inadequate segregation, labelling and storage of lead-contaminated waste (paint chips, dust, filters, PPE, soil) 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> • Use of waste transporters or disposal facilities that are not authorised to handle lead-contaminated materials • Failure to consider impacts of lead-based paint removal on neighbouring properties, public areas and sensitive receptors • Poor documentation of waste generation, tracking and disposal leading to regulatory non-compliance • Legacy contamination of site soil, gardens, playgrounds or car parks due to poor historical or current practices 		[REDACTED]	
10. Incident Management, Non-Conformance and Continuous Improvement	<ul style="list-style-type: none"> • Delayed or inadequate response to incidents involving uncontrolled release of lead dust, paint chips or residues • Under-reporting of near misses and minor contamination events that indicate control weaknesses • Lack of structured investigation into elevated exposure results, contamination findings or monitoring outcomes • Failure to implement and verify corrective actions following lead-related incidents or audit findings • Inconsistent capture and analysis of WHS performance data relating to lead management • Organisational learning not shared across projects, leading to repetition of systemic lead management failures 	High	[REDACTED]	Low

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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.