Spotter Duties For Overhead Dangers

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:

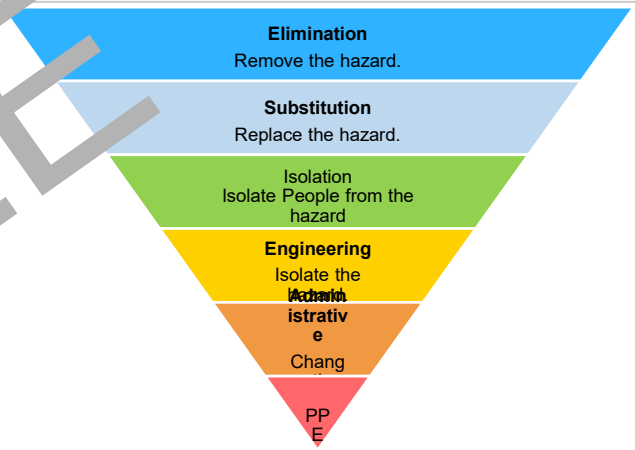
CLIENT OR PRINCIPAL CONTRACTOR DETAILS

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. Governance, WHS Duties and Legal Compliance	• Failure of PCBU and officers to understand and discharge primary duties under WHS Act 2011 in relation to use of spotters for overhead dangers • Absence of a documented WHS risk management process specifically addressing spotter use near overhead powerlines and other overhead hazards • Inadequate integration of spotter requirements into the overall Safety Management System (SMS) and project WHS plans • Lack of clear accountability for approving work that requires a spotter and for verifying that appropriate controls are in place • Inadequate consultation with workers and Health and Safety Representatives (HSRs) about safe systems of work involving spotters	High	• Develop and implement a documented WHS ...overnance procedure that explicitly addresses work involving spotters for overhead hazards, al...ed with WHS ...ct 2011 and relevant WHS Regulations and Codes of Practice (e.g. Managing Electrical ...ks in th...Workplace, Construction Work, Excavation, Mobile Plant) • Assign clear WHS responsi...ties for senior ma...gement, ...ervisors, planners, and plant operators regarding when and how spott... must be used an...up...sed • Embed spotter-rel... contr... into the organisation's SMS, project WHS plans, and contract WHS requirements s...at spotte...se is ...nned, not ... hoc • Establish a ...mal approv... process ...h...-risk work involving proximity to overhead services (including requir...ent fo... docum...ted risk asse...sment and safe work procedures before work commences) • Ensu... nsultat... mechanisms (toolbox talks, pre-starts, WHS committee meetings) routinely include review ...spotter ar...gements and feedback from workers • Sched...e pe...dic ma...gement reviews and internal audits to verify compliance with enterprise ...cedur...s and ...HS Act 2011 duties related to oversight of spotter activities	Medium
2. Planning, Design and Job Set-Up	• Inadequate pre-planning of tasks in areas with overhead electrical lines, structures, or other ov...ad ...ervices leading to unasses...d risks • Incomplete or ina...curate inf...n about location and ...overhe... powerlines and exclusion zones • Lack of formal requirement for ...y engagement with asset o...(e.g. electricity distributors) where overhead services are present • Poorly defined work zones that do not physically separate plant movements from overhead danger zones, increasing reliance on spotter alone • Failure to plan for alternative work methods that eliminate or minimise exposure to overhead hazards (e.g. de-energisation, relocation, or undergrounding of services)	High	• Implement a formal planning procedure that mandates identification and documentation of all overhead hazards at the design and tender stages (including drawings, site inspections, and service locators) • Require a documented Overhead Services Risk Assessment for all works where plant, loads, or equipment could encroach on electrical approach distances or other overhead danger zones • Establish a mandatory process for contacting and consulting with relevant utility/asset owners to obtain accurate information and conditions of work near overhead lines • Incorporate hierarchy of control into planning so that elimination, substitution, or engineering controls (e.g. line relocation, isolation, physical barriers, height restrictors) are considered before reliance on a spotter as an administrative control • Define and document designated plant operating zones, no-go zones, and spotter observation points in site plans and traffic management plans • Require that Project Managers verify and sign off that spotter requirements, overhead hazard controls, and communication protocols are embedded in job set-up documentation before work starts	Medium
3. Procurement and Selection of Plant,	• Procurement of plant that makes safe operation near overhead hazards	High		Medium

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Equipment and Technology	difficult (e.g. excessive boom length without limiters, poor visibility from operator position) • Lack of integrated safety devices (e.g. height limiting systems, slew restrictors, proximity detection, load moment indicators) increasing reliance on spotter judgement alone • Insufficient provision of dedicated communication equipment for spotter-operator interaction in noisy or visually obstructed environments • Failure to select and maintain high-visibility PPE and signage that effectively distinguishes spotters from other workers • Procurement of equipment from suppliers without verification that it meets relevant Australian Standards and manufacturer guidance for operation near electrical hazards		• Include requirements for overhead hazard management (e.g. height limiters, slew restrictors, cameras, audible alarms) in plant and equipment procurement specifications • Adopt a procurement standard that prioritises plant with engineering controls that reduce the likelihood of encroaching on exclusion zones, thereby reducing dependence on spotter performance • Specify and procure reliable communication systems (two-way radios, dedicated channels, noise-cancelling headsets) for exclusive use between spotter and operator where necessary • Standardise procurement of high-visibility clothing, helmets, and identification (e.g. distinctive coloured vests or markings) that clearly identify authorised spotters on site • Require suppliers to provide documentation confirming compliance with relevant Australian Standards and safe operating guidance, including limitations for work near overhead powerlines • Implement a formal review process to ensure new plant introduced to the fleet is assessed for suitability and risk when working under or near overhead hazards	
4. Competency, Training and Authorisation of Spotters and Operators	• Spotters lacking adequate training in electrical hazards, exclusion zones, and organisational procedures for overhead risks • Operators and supervisors not fully understanding the role, authority, and limitations of spotters • No formal competency assessment or licensing requirements for spotters working near overhead powerlines or crane operations • Inconsistent understanding of standard hand signals, radio protocols, and emergency stop commands • Failure to provide refresher training, leading to skill fade, complacency, and normalisation of deviance	High	[redacted]	Low
5. Role Definition, Supervision and	• Ambiguous definition of spotter responsibilities leading to distraction with	High		Medium

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Communication Protocols	other duties (e.g. labouring, traffic control) while spotting is required • Multiple spotters or informal assistants giving conflicting instructions to the operator • Inadequate supervision of spotters and operators by site management, resulting in unsafe practices becoming accepted • No formal escalation pathway when a spotter is concerned about unsafe conditions or pressured to continue work • Failure to implement and enforce standardised communication protocols (e.g. call and response, closed-loop communication) between spotter and operator		[redacted]	
6. Fatigue, Workload and Human Factors Management	• Spotter fatigue and loss of concentration due to long periods of continuous high-vigilance work • Cognitive overload [redacted] multiple hazards, vehicles, or worke[redacted] • Inappropriate roste[redacted] reducing alertness (e.g. night work, extended shifts, inadequate break[redacted] • Exposure to environmental stressors (heat, cold, glare, noise) impairing the spotter's ability to detect hazards and communicate clearly • Complacency arising from repetitive tasks without incident, leading to reduced vigilance and risk perception	High	[redacted]	Medium
7. Documentation, Procedures and Work Instructions	• Lack of clear, accessible written procedures describing safe systems of work for using a spotter near overhead dangers • Procedures that do not reflect current site conditions, plant configurations, or	Medium	[redacted]	Low

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	regulatory requirements, leading to confusion or non-compliance • Overly complex or generic documentation that workers do not read, understand, or apply in practice • Failure to systematically use and maintain checklists and permits related to overhead hazards and spotter deployment • Inconsistent documentation between principal contractor and subcontractors, leading to gaps or conflicts in requirements		[redacted]	
8. Site Layout, Traffic Management and Spotter Positioning Systems	• Poor site layout and traffic management planning creating blind spots and complex movements that increase reliance on spotter judgement • Inadequate systems to ensure spotte[r] are positioned with clear line of sight to both overhead hazards and plant movements • Uncontrolled inter[ac]tion between spotters, pedestria[n]s, and vehicle[s] leading to new risk[s] (e.g. spotter st[r]uck by plant while monitoring overhead hazards) • Failure to use physical c[on]trols (e.g. barriers, bunting, clearance markers) that would simplify the spotter's task • No documented protocol for adjusting spotter position as work progresses, resulting in the spotter drifting into unsafe locations	High	[redacted]	Medium
9. Communication Systems, Tools and Environmental Constraints	• Inadequate communication systems between spotter and operator in high-noise or low-visibility environments • Reliance on hand signals only where line of sight can be easily obstructed by plant, structures, or weather conditions	High	[redacted]	Medium

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	• Radio interference, cross-talk, or shared channels resulting in missed or misunderstood instructions • Lack of backup communication method if primary system fails (e.g. flat batteries, equipment damage) • No formal process for checking and testing communication devices before use		[redacted]	
10. Contractor Management and Coordination of Multiple PCBUs	• Different PCBUs using inconsistent standards for spotter competency, communication, and overhead hazard controls on the same site • Assumptions between principal contractors and subcontractors about who is responsible for providing and managing spotters • Poor coordination of simultaneous operations (SIMOPS) where multiple cranes, EWPs, or vehicles share overhead risk areas • Inadequate induction of subcontractor spotters into site-specific rules and procedures • Lack of clarity over who has authority to stop work when overhead risk becomes unacceptable	Hi[redacted]	[redacted]	Medium
11. Incident Reporting, Investigation and Continuous Improvement	• Under-reporting of near misses involving overhead clearances and spotter-assisted activities, leading to missed learning opportunities • Superficial investigations that focus on operator or spotter error rather than systemic root causes (planning, training, communication, design) • No centralised analysis of incident data to identify patterns in overhead hazard management failures	Medium	[redacted]	Low

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	• Lack of feedback loop to update procedures, training, and engineering controls following incidents or regulatory changes		[redacted]	
12. Emergency Preparedness and Response for Overhead Incidents	• Absence of a specific emergency response plan for plant contact with overhead powerlines or other overhead structures while under spotter guidance • Workers, including spotters and operators, unaware of safe response actions if electrical contact occurs (e.g. stay in cab, step-and-shuffle exit when instructed) • No coordination with emergency services and asset owners regarding response protocols for electrical incidents • Lack of drills or simulations to practis emergency response to overhead incidents, resulting in co e and delay • Emergency infor tion and rescue equipment not rea avai at t point of work	High	[redacted]	Medium

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