

Stock Picking and Shelving Access

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 Risk Management Framework	<ul style="list-style-type: none"> Lack of a documented WHS risk management procedure for stock picking and shelving access at height Officers not exercising due diligence to ensure compliance with WHS Act 2011 and WHS Regulations Inadequate consultation with workers and HSRs on height-related storage and access risks Failure to integrate working at height risks into the organisation's overall WHS management system No clear allocation of responsibilities for managing storage height, equipment selection and inspection Inadequate monitoring, review and continuous improvement of controls related to shelving access 	4A	<ul style="list-style-type: none"> Establish and maintain a documented WHS risk management procedure that specifically covers stock picking and shelving access, including high storage and overhead compartments Ensure officers demonstrate due diligence by regularly reviewing height-related risk controls, resourcing WHS initiatives and verifying legal compliance Implement a formal WHS governance structure with defined roles, responsibilities and accountabilities for storage design, equipment procurement, inspection and training Embed consultation mechanisms (e.g. WHS committee, toolbox talks, safety walks) that specifically address working at heights, storage and stock access areas Integrate stock picking and shelving access risks into the organisation's WHS risk register and audit program with scheduled reviews at least annually or after incidents Develop tools for safe storage and access (e.g. reduction in over-shoulder reaches, incidents involving ladders, near misses involving items from height) and report them to senior management 	3H
2. Storage Design, Racking Layout and Engineering Controls	<ul style="list-style-type: none"> Inappropriate racking and shelving design leading to unstable loads or collapse High-use or heavy items stored at excessive height requiring unsafe reaching or climbing Inadequate design of racking systems or hoists for accessing high stock, creating crush or struck-by risks Insufficient clearance around aisles, high shelves and overhead compartments increasing collision risks with forklifts or pedestrians Uncertified or non-compliant racking for working at heights (rack storage access platforms, mezzanines) No formal engineering assessment of load ratings for high storage areas and overhead cupboards 	4A	<ul style="list-style-type: none"> Engage competent engineers or racking specialists to design and certify all shelving, pallet racking, overhead cupboards and high storage systems to relevant Australian Standards Implement a storage zoning system that places heavy, frequently accessed and awkward items at waist-to-shoulder height, minimising the need to access high shelves Designate high-level storage only for light, low-frequency items and document this requirement in storage procedures Where pulleys or mechanical devices are used to access high stock, ensure they are engineered, rated and installed to manufacturer specifications, with physical guarding and clear operating instructions Provide fixed access solutions such as integrated stairs, walkways or platforms instead of ad-hoc ladder use where regular access to high storage is required Ensure adequate aisle width, impact protection and separation between pedestrians, stock pickers and mobile plant around racking and high shelving areas 	2M
3. Working at Height Access Systems	<ul style="list-style-type: none"> Reliance on unsuitable or domestic-grade ladders for industrial stock picking 	4A	<ul style="list-style-type: none"> Develop and implement a documented hierarchy of control procedure for working at height in storage areas that prioritises elimination and engineering controls over ladders 	2M

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(Ladders, Platforms, EWP, Pulleys)	<ul style="list-style-type: none"> No formal system for selection, inspection and withdrawal from service of ladders, step platforms, mobile scaffolds and EWPs used for shelving access Inappropriate use of forklifts or pallets as work platforms to reach high storage Uncontrolled use of pulley systems or makeshift lifting devices for fetching items from high places Inadequate controls for working at height while fitting cupboards or working on rack storage Failure to control environmental factors (uneven floors, wet surfaces, congestion) when using access equipment 		<ul style="list-style-type: none"> Standardise approved access equipment (e.g. industrial platform ladders with handrails, order picker machines, mobile step platforms, EWPs) and prohibit use of unsafe alternatives such as standing on pallets or shelving Introduce a formal inspection and tagging system for all access equipment, including scheduled inspections, defect reporting and removal from service protocols Implement a permit or authorisation process for use of EWPs and complex height access (e.g. working at height fitting cupboards, rack storage modification) Develop clear, written procedures for the safe use of pulley and lifting devices at height, including rated components, exclusion zones and supervision requirements Ensure floor surfaces and access equipment locations are maintained in good condition, kept dry, free of obstructions and subject to housekeeping inspections 	
4. Stock Storage Strategy and Material Handling at Height	<ul style="list-style-type: none"> Poorly planned stock placement leading to frequent climbing or overreaching into overhead compartments and high storage Heavy or bulky items stored above shoulder height creating manual handling and drop object risks Ad-hoc storage of materials or tools at height during cupboarding or rack installation No system for securing items on high shelves or in overhead cupboards against movement or dislodgement Inadequate labelling of load limits on shelves and high storage areas Uncontrolled stacking of cartons or materials above racking height or on top of cupboards 	3H	[REDACTED]	2M
5. Procurement, Suitability and Maintenance of Access and Lifting Equipment	<ul style="list-style-type: none"> Procurement of low-quality, unsuitable or non-compliant ladders, pulleys, hoists and access platforms Lack of a preventative maintenance program for order pickers, EWPs, hoists and pulley systems 	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> Failure to maintain safety features such as brakes, guardrails, interlocks and fall-prevention devices Inadequate verification of equipment against Australian Standards for working at height and mechanical lifting Spare keys, tools or critical items stored at height without consideration of safe access equipment required to retrieve them 		[REDACTED]	
6. Training, Competency and Supervision for Work at Height	<ul style="list-style-type: none"> Workers not trained in safe stock picking practices or correct use of height access equipment Inadequate competency assessment for persons operating order pickers, EWP's or using pulley systems at height Supervisors unaware of their responsibilities regarding enforcement of working at height procedures No training in hazard identification for overreaching, unstable loads and inappropriate storage of stock Lack of refresher training leading to unsafe shortcuts or normalisation of deviance over time 	4A	[REDACTED]	2M
7. Safe Systems of Work, Procedures and Permits	<ul style="list-style-type: none"> Absence of documented procedures for accessing high storage units, using pulleys or working on rack storage Procedures that focus only on manual tasks rather than system and management controls No permit-to-work or authorisation process for higher-risk work at height (e.g. fitting cupboards, altering racking, using EWP's) Inconsistent practices between shifts, contractors and sites when accessing high shelves 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Failure to incorporate lessons learned from incidents into procedures and systems 		[REDACTED]	
8. Consultation, Communication and Worker Engagement	<ul style="list-style-type: none"> Workers' practical knowledge of storage and access risks not captured in system design Lack of clear communication on rules for using ladders, platforms and equipment when accessing high areas Poor reporting culture for hazards and near misses involving working at height or dropped objects Multi-lingual workforce not fully understanding instructions relating to safe access to high shelving Insufficient involvement of workers in decisions about storage redesign, equipment procurement and process changes 	3H	[REDACTED]	2M
9. Contractor and Third-Party Management	<ul style="list-style-type: none"> External installers or contractors fitting cupboards or racking at height without following site WHS procedures Contractor equipment (ladders, scaffolds, pulleys, WPs) not meeting site standards or Australian requirements Lack of coordination between contractors and employees working in the same storage areas, leading to overlapping height risks Inadequate verification of contractor competence in working at heights and racking installation Poor induction of contractors regarding site-specific hazards, emergency procedures and exclusion zones 	3H	[REDACTED]	2M
10. Ergonomics, Manual Handling and	<ul style="list-style-type: none"> Excessive reaching, twisting or force when retrieving stock from high shelves or overhead compartments 	3H	[REDACTED]	2M

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Dropped Object Controls	<ul style="list-style-type: none"> Inadequate controls to prevent tools and materials falling from height during cupboard fitting or rack work Lack of consideration of human factors when designing pulley systems and high storage workflows No system for segregating people from areas where items may be dropped from height Cumulative strain injuries from repeated overhead lifting and reaching to high storage 		[REDACTED]	
11. Emergency Preparedness, Rescue and Incident Response	<ul style="list-style-type: none"> No rescue plan for persons incapacitated while working at height on shelving, platforms or EWPs Delayed emergency response due to poor access to high storage areas or lack of communication systems Inadequate first aid capability for injuries resulting from falls or struck-by incidents involving falling objects Workers unaware of emergency procedures for incidents occurring in high-bay racking or storage area Lack of post-incident investigation and learning focused on systemic and management failures 	3H	[REDACTED]	2M
12. Environment, Housekeeping and Traffic Management in Storage Areas	<ul style="list-style-type: none"> Poor housekeeping resulting in trip hazards around ladders, platforms and access equipment Inadequate lighting in high-bay storage areas affecting depth perception and safe placement of access equipment Slippery or uneven flooring contributing to falls from ladders and platforms used to reach high stock 	3H	[REDACTED]	2M

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	<ul style="list-style-type: none"> Uncontrolled interaction between pedestrians, stock pickers and mobile plant near racking and high shelves Unsecured access to mezzanines, high storage platforms and restricted overhead areas 		[REDACTED]	
13. Fatigue, Workload and Scheduling Controls for Height-Related Tasks	<ul style="list-style-type: none"> Workers accessing high storage areas or pulleys when fatigued, increasing likelihood of mis-steps or poor judgement High workload and time pressure encouraging shortcuts such as climbing racking or overloading platforms Inadequate breaks during intensive stock picking periods leading to reduced concentration at height Rosters that do not account for physically demanding tasks like repeated climbing or overhead reaching Lack of supervision during early morning, night or weekend shifts when height-related tasks may still occur 	3H	[REDACTED]	1L
14. Monitoring, Audit and Continuous Improvement of Height Controls	<ul style="list-style-type: none"> Controls for stock picking and shelving access at height not regularly reviewed for effectiveness Lack of structured inspections for racking integrity, access equipment condition and storage compliance Data on incidents, near misses and observations not analysed to identify trends in height-related risks Non-compliances with procedures (e.g. unsafe ladder use, storing heavy items at height) going uncorrected Changes in stock types, volumes or layouts implemented without reassessment of height risks 	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.