

Tow Truck - Tilt Tray

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. Vehicle Procurement and Design Suitability	<ul style="list-style-type: none"> • Selection of tow truck tilt trays that are not fit for purpose or not compliant with Australian Design Rules and relevant state/territory road transport legislation • Inadequate consideration of load capacity, stability, and centre-of-gravity impacts for typical recovery tasks • Lack of engineering controls such as fall protection, load restraint systems, emergency stop devices and adequate lighting on tray and winch areas • Procurement based solely on cost without documented WHS and lifecycle safety criteria • No formal consultation with drivers, mechanics and WHS representatives when specifying vehicles and equipment 	High	<ul style="list-style-type: none"> • Develop and implement a formal vehicle procurement policy that incorporates WHS Act 2011 primary duty of care and due diligence requirements, including documented safety specifications for tilt tray tow trucks • Specify compliance with Australian Design Rules, Heavy Vehicle National Law (where applicable), AS/NZS 1418 series (cranes, lifting), AS/NZS 2244 series (machinery safety) and relevant load restraint guides as minimum procurement criteria • Use a risk-based specification process that considers maximum loads, typical vehicle recovery scenarios, terrain conditions, and operating environment (urban, highway, remote, night work) • Require suppliers to provide documented evidence of compliance (certificates, engineering reports, testing results) for key safety features such as winches, hydraulic systems, anchorage points and load restraint systems • Include mandatory features such as non-slip surfaces, guard rails or anchor points for fall protection, adequate task lighting, in-cab and external cameras where justified by risk, and clearly marked exclusion zones • Undertake pre-purchase risk assessments with participation from experienced drivers, maintenance staff and HSRs to ensure practicality and safety of proposed designs • Include requirements in purchase contracts for supplier training, technical manuals, maintenance schedules and safe use instructions that align with PCBU obligations under the WHS Act 2011 • Establish a change management process for introducing new vehicle models or significant modifications, including consultation, risk assessment and documented approval 	Medium
2. Governance, WHS Leadership and Safety Culture	<ul style="list-style-type: none"> • Lack of clear WHS governance structure and accountabilities for tow truck operations • Insufficient officer due diligence regarding hazards and risks associated with tilt tray fleets • Production and response time pressures overriding safety considerations in dispatch and field decisions • Inadequate consultation with workers and Health and Safety Representatives (HSRs) on operational risks and proposed changes • Poor reporting culture leading to under-reporting of near misses, fatigue concerns, vehicle defects and client-related hazards 	High	<ul style="list-style-type: none"> • Define and document WHS governance arrangements, including roles and responsibilities for officers, managers, dispatchers, supervisors and drivers in line with WHS Act 2011 sections 19 and 27 • Implement a formal WHS management system (aligned with ISO 45001 or similar) that specifically addresses tow truck tilt tray operations, with scheduled audits and management reviews • Set and communicate clear safety objectives and key performance indicators that prioritise safe outcomes over response times or job volume, and monitor these routinely at leadership level • Embed due diligence activities for officers, including regular WHS briefings on tow truck risks, field visits, review of incident data and verification of control implementation • Establish structured worker consultation mechanisms such as WHS committees, toolbox talks, and digital feedback channels specifically addressing tow truck hazards, procedures and equipment • Promote a just culture that encourages reporting of hazards, near misses, client site issues and fatigue without fear of unreasonable reprisal, supported by a clear disciplinary framework for wilful breaches • Integrate WHS considerations into business planning, rostering, client contracts and performance reviews to ensure commercial pressures do not incentivise unsafe practices • Conduct periodic independent WHS audits of tow truck operations and management systems, with documented corrective actions and follow-up responsibilities 	Medium

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3. Driver Competency, Licensing and Training Systems	<ul style="list-style-type: none"> • Drivers operating tilt tray tow trucks without appropriate licence class, endorsements or verifiable competency • Inconsistent induction and training practices across depots, shifts or subcontractors • Lack of formal verification of competency for winch use, load restraint, working around traffic, and managing difficult recovery scenarios • No structured training for new technology such as telematics, in-vehicle cameras, dispatch systems and electronic job management tools • Failure to provide refresher training, leading to skill fade and normalisation of unsafe shortcuts 	High	<ul style="list-style-type: none"> • Establish a documented competency framework for all driver roles that specifies minimum licence classes, experience levels and verified skills required for tilt tray operations • Implement a standardised induction program for new drivers, covering WHS responsibilities, company policies, vehicle-specific systems, emergency procedures and reporting requirements • Use a formal Verification of Competency (VOC) process for key activities such as operating tilt mechanisms, using winches, applying load restraint systems, and working in or near live traffic environments • Maintain centralised training and competency records for each driver, including copies of licences, qualification expiry dates, VOC outcomes, and history of incidents or remedial training • Provide structured refresher training at defined intervals (e.g. annually or biannually) and after key events such as incidents, introduction of new equipment or changes to procedures • Include fatigue management, defensive driving, hazard perception, conflict management and dealing with aggressive or aggressive clients in the training curriculum • Ensure subcontractor drivers are subject to the same induction, competency and verification processes as direct employees, formalised in contractual arrangements • Regularly evaluate training effectiveness through field observations, ride-alongs, quizzes, and review of incident trends, adjusting content accordingly 	Medium
4. Fatigue Management and Working Hours	<ul style="list-style-type: none"> • Excessive working hours, overtime work and irregular shifts leading to driver fatigue and reduced alertness • Inadequate consideration of cumulative fatigue from call-out work, secondhand employment or long commuting distances • Incentive structures that reward high job numbers or after-hours attendance, encouraging drivers to work beyond safe limits • Lack of systems to monitor actual hours worked, rest breaks taken and sleep opportunities • Insufficient training for managers, dispatchers and drivers on recognising and managing fatigue risk 	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

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			[REDACTED]	
5. Vehicle Maintenance, Inspection and Defect Management Systems	<ul style="list-style-type: none"> • Failure of critical components such as hydraulics, winches, brakes and steering due to inadequate maintenance • Uncontrolled use of vehicles with known defects or overdue servicing • Lack of systematic pre-use and periodic inspections, leading to undetected wear and damage • Poor communication between drivers, maintenance staff and management about recurring or serious defects • Substandard repairs from non-qualified or poorly supervised contractors 	High	[REDACTED]	Medium
6. Journey Management and Dispatch Practices	<ul style="list-style-type: none"> • Poorly planned jobs resulting in unnecessary travel, exposure to traffic risks and extended driving hours • Dispatch decisions based solely on speed of response rather than driver fatigue, proximity, skill set, and vehicle suitability • Inadequate information provided to drivers about job locations, site conditions, vehicle types and special hazards • Lack of escalation process for high-risk jobs such as recoveries on high-speed roads, remote locations or unstable terrain 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> • Pressure from clients, roadside assistance providers or management to accept unsafe jobs or timeframes 		[REDACTED]	
7. Contractor and Subcontractor Management	<ul style="list-style-type: none"> • Subcontracted tow operators not meeting the PCBU's WHS standards and legal obligations • Inconsistent training, induction and competency verification for subcontractor drivers • Lack of clarity over responsibilities and communication channels in multi-PCBU environments • Inadequate monitoring of subcontractor performance, incident reporting and corrective actions • Commercial arrangements that unintentionally incentivise unsafe behaviours by subcontractors 	High	[REDACTED]	Medium
8. Incident, Near Miss and Hazard Reporting and Investigation	<ul style="list-style-type: none"> • Under-reporting of incidents, near misses and hazards due to fear of blame, complex processes or lack of feedback 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> Failure to identify systemic or recurring issues across the tow truck fleet and operations Inadequate investigation quality leading to superficial causes and ineffective corrective actions Non-compliance with notifiable incident requirements under WHS Act 2011 Lack of follow-through on agreed corrective actions and recommendations 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
9. Communication, Consultation and Worker Engagement	<ul style="list-style-type: none"> Insufficient communication of policies, procedures and changes relevant to tow truck operations Limited involvement of workers and HSRs in the development and review of safe systems of work Language, literacy or technology barriers that prevent some workers from understanding safety information Inadequate mechanisms for workers to raise concerns or improvement ideas related to tilt tray operations 	Medium	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Low

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			[REDACTED]	
10. Emergency Preparedness and Response Management	<ul style="list-style-type: none"> Inadequate planning for on-road emergencies involving tow trucks, including collisions, rollovers, fires or hazardous load situations Lack of clear procedures for managing breakdowns or failures of tilt mechanisms or winches during operations Insufficient training and equipment for drivers to manage first aid, spills, and traffic control during emergencies Poor coordination with emergency services, road authorities and clients during major incidents Failure to test and review emergency response plans, leading to confusion during real events 	High	[REDACTED]	Medium
11. Remote and Isolated Work Management	<ul style="list-style-type: none"> Drivers working alone in remote or isolated locations without reliable communication or timely access to assistance Delayed response to medical emergencies, vehicle breakdowns or acts of violence in isolated areas Inadequate location tracking and check-in systems for lone workers Insufficient planning for environmental extremes (heat, cold, bushfire risk, flooding) during remote recoveries 	High	[REDACTED]	Medium

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			[REDACTED]	
12. Client, Public and Third-Party Interface Management	<ul style="list-style-type: none"> • Conflicting site rules or unsafe directions from clients, road authorities or members of the public • Exposure of bystanders, customers or other road users to risks arising from tow operations due to inadequate control by the PCBU • Poor management of aggressive, distressed or intoxicated clients at breakdown or crash scenes • Inadequate coordination with other PCBUs at multi-vehicle or construction sites 	High	[REDACTED]	Medium
13. Documentation, Procedures and Record Management	<ul style="list-style-type: none"> • Outdated, inconsistent or inaccessible procedures for tow truck operations and WHS management • Lack of version control leading to drivers using superseded practices • Inadequate record keeping, making it difficult to demonstrate due diligence or investigate incidents effectively 	Medium	[REDACTED]	Low

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	<ul style="list-style-type: none"> Overly complex or lengthy documents that workers are unlikely to read or understand 		<div style="background-color: black; height: 15px; width: 100%;"></div>	

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.