

**Tow Truck Tilt Tray Operations and Vehicle Recovery**

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:	

SAMPLE

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			<b>Elimination</b> Remove the hazard.	
LIKELY	2 MODERATE	3 HIGH	3 HIGH	4 ACUTE	4 ACUTE	4A ACUTE	DO NOT PROCEED	<b>Substitution</b> 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.	<b>Engineering</b> 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:	
<b>4A</b>	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.
<b>3H</b>	Review and approve additional controls for the task parts. Senior supervisor sign-off needed.
<b>2M</b>	Ensure all nominated controls are in place and effective. Proceed with caution; monitor conditions.
<b>1L</b>	Proceed, following standard operating procedures. Monitor and keep records.

  

Consequence Scale:			
Consequence	People (injury/illness)	Project / Assets	Compliance / Reputation
<b>Catastrophic</b>	Fatality or permanent total disability	project shutdown	Significant regulator intervention; criminal prosecution
<b>Major</b>	Serious injury/illness (hospital > 5 days)	critical delay	Improvement notice; major media coverage
<b>Moderate</b>	Medical-treatment injury; lost-time > 1 day	moderate delay	Minor breach; adverse client comment
<b>Minor</b>	First-aid only, no lost time	negligible delay	Isolated non-conformance
<b>Insignificant</b>	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, Legal Compliance and WHS Accountability	<ul style="list-style-type: none"> <li>Lack of clear WHS governance structure for tow truck operations leading to unclear duties under WHS Act 2011</li> <li>Inadequate understanding of Chain of Responsibility obligations for heavy vehicles and tow trucks</li> <li>No formal process to review compliance with state tow truck licensing and vehicle standards legislation</li> <li>Policies not reflecting current Australian Standards and Codes of Practice for vehicle recovery and tilt tray operations</li> <li>Insufficient resourcing for WHS roles, resulting in unmanaged systemic risks</li> <li>Poor consultation with workers and health and safety representatives about tow truck system risks</li> <li>No documented WHS objectives or performance indicators for towing and recovery activities</li> </ul>	4A	<ul style="list-style-type: none"> <li>Establish and document a WHS governance framework defining PCBU, officer and worker duties specific to tow truck and tilt tray operations aligned with WHS Act 2011 and WHS Regulations</li> <li>Assign clear accountability for tow truck safety (e.g. Asset/WHS Manager) with documented role descriptions and authority to implement controls</li> <li>Maintain a legal register covering relevant WHS legislation, heavy vehicle national law, state tow truck regulations, road rules and environmental requirements and review at least annually</li> <li>Develop and endorse a Tow Truck and Vehicle Recovery WHS Policy that references zero harm principles, due diligence, and Chain of Responsibility duties</li> <li>Implement regular management review meetings (e.g. quarterly) to review WHS performance, incidents, audit outcomes and legislative changes relating to towing operations</li> <li>Ensure due diligence is demonstrated through documented site visits, toolbox attendance, review of training, maintenance and risk assessments for tow operations</li> <li>Establish formal worker consultation mechanisms (HSR structure, WHS committee, toolbox talks) with tow truck operators to capture operational risks and improvement ideas</li> <li>Integrate tow truck WHS objectives and KPIs into business plans (e.g. incident rate reductions, inspection completion rates, training completion) and report performance to senior management</li> </ul>	3H
2. Organisational Risk Management and Change Management	<ul style="list-style-type: none"> <li>No systematic risk assessment process for new or changed towing activities (e.g. scooter towing, heavy vehicle recovery, tilting operations)</li> <li>Uncontrolled introduction of new tow trucks, underbody wheel lifts, hoists or tilt beds without engineering approval</li> <li>Failure to assess risks associated with operating in new locations, depots or temporary storage yards</li> <li>Inadequate review of hazards for specialised tasks such as towing malfunctioning trucks or damaged vehicles</li> <li>Poor communication of changes to procedures, routes, equipment or IT systems used for dispatch and job allocation</li> </ul>	4A	<ul style="list-style-type: none"> <li>Implement a documented WHS risk management procedure requiring identification, assessment, control and review of risks for all tow truck and tilt tray operations</li> <li>Require formal risk assessments for new or changed equipment (tilt trays, hoists, underbody wheel lifts, scooter towing frames, towing cables) before procurement and commissioning</li> <li>Use a structured Management of Change (MoC) process for significant changes (new depots, addition of heavy recovery services, new storage facilities, new client contracts) including consultation with operators and HSRs</li> <li>Maintain a register of high-risk activities (e.g. heavy truck recovery, off-road extractions, congested CBD recoveries) with specific documented risk controls and approval requirements</li> <li>Ensure updated procedures and risk controls are communicated via toolbox talks, written bulletins and re-training where changes affect tow truck operators or depot staff</li> <li>Define criteria and an approval process for tagging out, quarantining and decommissioning unsafe towing equipment, tilt trays or hoists, including recording in an asset register</li> <li>Schedule periodic review (at least annually) of risk assessments for tilt tray operations, hoist use, storage yard operations and vehicle verification tasks to ensure controls remain effective</li> </ul>	2M

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	<ul style="list-style-type: none"> <li>No formal process to retire or decommission unsafe equipment from service</li> </ul>			
3. Fleet Procurement, Design and Engineering Controls	<ul style="list-style-type: none"> <li>Tow trucks procured without adequate safety specifications (e.g. no stability control, inadequate braking, poor load rating for tilt tray)</li> <li>Tilt trays, underbody wheel lifts, winches and hoists not compatible with intended loads and vehicle types (e.g. scooters, light vehicles, malfunctioning trucks)</li> <li>Absence of engineered fail-safes on tilt tray and winch operations that could lead to rollback or uncontrolled movement</li> <li>Substandard towing cables, chains, hooks or lifting points not rated to Australian Standards</li> <li>Insufficient lighting, cameras or mirrors leading to poor visibility when directing vehicles onto tilt trays or operating in low light</li> <li>Cab design not suitable for long shifts, increasing muscular/skeletal and fatigue risk while driving tow trucks</li> </ul>	4A	<ul style="list-style-type: none"> <li>Develop a technical procurement specification for tow trucks and tilt trays requiring compliance with relevant Australian Standards, ADRs and manufacturer ratings for towing and recovery operations</li> <li>Specify minimum safety features for all new tow trucks (e.g. ABS, stability control, load-rated tilt tray, integrated winch control, reversing cameras, work lights, ANCAP 5-star equivalent where applicable)</li> <li>Ensure all winches, towing cables, chains, underbody wheel lifts and hoists are engineered, rated and certified by competent persons with documentation retained in equipment files</li> <li>Require independent engineering verification for modifications to tilt trays, wheel lifts, scooter towing frames and underbody towing systems</li> <li>Install physical interlocks and emergency stop devices on tilt tray and hoist controls to prevent uncontrolled rollback and permit safe isolation during maintenance</li> <li>Provide adequate directional lighting, beacons, work lamps and camera systems on tow trucks to support safe operations during alignment, loading and unloading at all hours</li> <li>Ensure cab design and seating in tow trucks meets ergonomic guidelines for long-distance driving, with adjustable seating, climate control and noise reduction features</li> <li>Maintain an asset register for all towing and recovery equipment, including load ratings, engineering certificates and expiry dates for inspections</li> </ul>	2M
4. Preventative Maintenance, Inspection and Asset Management	<ul style="list-style-type: none"> <li>Inadequate system for daily inspection of tow trucks and tilt trays leading to undetected defects</li> <li>No scheduled inspection regime for winches, towing cables, hooks, chains, underbody wheel lifts and scooter towing equipment</li> <li>Failure to conduct regular non-destructive testing or strength testing of critical lifting and towing components</li> <li>Poor record-keeping of maintenance activities, making it difficult to verify roadworthiness and compliance</li> <li>Tow trucks or hoists remaining in service despite known defects due to</li> </ul>	4A	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	2M

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	<ul style="list-style-type: none"> <li>production pressure or poor defect escalation processes</li> <li>Lack of documented standards for assessing damage to tow trucks or equipment after incidents</li> </ul>		[REDACTED]	
5. Competency, Licensing, Training and Verification of Skills	<ul style="list-style-type: none"> <li>Tow truck drivers operating tilt trays, hoists or underbody wheel lifts without appropriate training or competency assessment</li> <li>No formal induction covering specific hazards of vehicle recovery, tilt bed rollback, scooter towing and towing malfunctioning trucks</li> <li>Inadequate instruction on safe operating envelopes and limitations of towing equipment, leading to overloading or misuse</li> <li>Supervisors unable to identify unsafe practices due to lack of technical understanding of towing systems</li> <li>Failure to maintain currency of driver licences, tow truck authorities and high-risk work licences (where applicable)</li> <li>Informal on-the-job training with no structured competency verification or inspecting damage to verify roadworthiness of recovered vehicle</li> </ul>	4A	[REDACTED]	2M
6. Fatigue, Rostering and Journey Management	<ul style="list-style-type: none"> <li>Extended shifts, night work and irregular call-outs leading to fatigue while driving tow trucks or operating tilt trays</li> <li>Inadequate scheduling and journey planning for long-distance recovery jobs, increasing risk of speeding and microsleeps</li> <li>Lack of a formal fatigue management policy for on-call and emergency response towing work</li> <li>Insufficient controls for working alone in remote or low-traffic areas, affecting decision-making and response to incidents</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Time pressure from clients, insurers or traffic authorities causing risk-taking behaviour during loading, unloading or operating towing controls</li> </ul>		[REDACTED]	
7. Traffic, Roadside and Site Safety Management	<ul style="list-style-type: none"> <li>Uncontrolled exposure to live traffic when aligning tow trucks with vehicles on roadsides, highways or intersections</li> <li>Inadequate planning for recovery in complex environments such as multi-storey car parks, loading docks or narrow lanes</li> <li>Poor coordination with traffic controllers, police or road authorities during high-risk recovery operations</li> <li>Insufficient systems for risk assessment of roadside jobs before deployment of equipment and personnel</li> <li>No standardised approach to safe positioning of tow trucks and tilt trays relative to the vehicle being recovered</li> </ul>	4A	[REDACTED]	2M
8. Safe Systems for Tilt Tray, Hoist and Towing Equipment Operation	<ul style="list-style-type: none"> <li>Lack of standardised procedures for operating tilt trays, underbody wheel lifts and towing controls</li> <li>Uncontrolled movement or rollback of tilt beds due to incorrect operation or system faults</li> <li>Improper use of hoists when mounting towed vehicles for inspection or repair, leading to instability or collapse</li> <li>No systematic approach for testing towing cables, chains and anchor points for strength and condition</li> <li>Inadequate controls for operating underbody wheel lifts around persons on foot or in tight spaces</li> </ul>	4A	[REDACTED]	2M

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	<ul style="list-style-type: none"> <li>Reliance on individual operator judgement rather than documented operating envelopes and limitations</li> </ul>		[REDACTED]	
9. Vehicle Assessment, Damage Inspection and Roadworthiness Verification Systems	<ul style="list-style-type: none"> <li>Inconsistent processes for inspecting damage of towed vehicles before loading, leading to misjudgement of securement needs</li> <li>No defined criteria or process for verifying basic roadworthiness of vehicles before they are driven onto or off tilt trays or through depots</li> <li>Inadequate communication to workshops or storage facilities regarding known damage or mechanical faults</li> <li>Improper use of hoists or supports when mounting towed vehicles for further inspection or repair</li> <li>Workers relying on assumptions rather than structured checklists to determine whether vehicles can be moved under their own power</li> </ul>	3H	[REDACTED]	1L
10. Depot, Workshop and Temporary Storage Yard Safety	<ul style="list-style-type: none"> <li>Poor layout of depots and storage yards leading to vehicle congestion, near misses and collisions</li> <li>Inadequate systems for separating pedestrians from moving tow trucks and recovered vehicles</li> <li>No standard arrangements for temporary storage of towed vehicles, resulting in instability, fluid leaks or fire hazards</li> <li>Lack of documented procedures for preventing unauthorised access to stored vehicles and their contents</li> <li>Insufficient controls for hazardous substances (e.g. fuel, oils, coolants) leaking from damaged vehicles in storage</li> <li>Ineffective housekeeping and traffic flow management within workshops where tow trucks, hoists and pedestrians interact</li> </ul>	4A	[REDACTED]	2M

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11. Security, Evidence Management and Protection of Towed Property	<ul style="list-style-type: none"> <li>• Failure to prevent unauthorised access to towed vehicles, leading to theft, tampering or disputes</li> <li>• Inadequate system for documenting vehicle condition and contents at the time of towing and storage</li> <li>• Poor chain-of-custody records for vehicles involved in crashes, insurance claims or police investigations</li> <li>• Lack of clear responsibilities for key control, yard access and release of vehicles</li> <li>• Disputes with customers or third parties regarding damage allegedly caused during towing or storage</li> </ul>	3H	[REDACTED]	1L
12. Communications, Dispatch and Remote Work Systems	<ul style="list-style-type: none"> <li>• Unreliable communication channels between drivers, dispatch and emergency services, particularly in remote or low-coverage areas</li> <li>• No formal process to support lone workers during night shifts or remote recoveries</li> <li>• Poor quality or incomplete information provided to drivers, leading to mismatched equipment or underestimation of hazards</li> <li>• Dispatch practices that promise speed over safety, encouraging unsafe driving or rushed tilt tray operations</li> <li>• Lack of documented contingency plans if communications or GPS tracking systems fail</li> </ul>	3H	[REDACTED]	1L
13. Incident, Hazard and Near Miss Reporting and Investigation	<ul style="list-style-type: none"> <li>• Under-reporting of hazards and near misses related to tow truck operations and tilt tray usage</li> <li>• No consistent process for investigating rollbacks, equipment failures or vehicle damage incidents</li> </ul>	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> <li>Lack of trend analysis to identify recurring system failures in towing gear, hoists, or daily inspection routines</li> <li>Workers perceiving that reporting will lead to blame or disciplinary action, reducing transparency</li> <li>Corrective actions from investigations not tracked to completion, resulting in repeated incidents</li> </ul>		[REDACTED]	
14. Emergency Preparedness and Response for Towing Operations	<ul style="list-style-type: none"> <li>Lack of planning for emergencies during towing and recovery, such as vehicle fires, fuel spills or equipment failure in live traffic</li> <li>Inadequate procedures for managing medical emergencies involving drivers, passengers or third parties at the recovery scene</li> <li>No clear instructions for responding to trapped or unstable vehicles during loading or unloading on tilt trays</li> <li>Poor coordination with emergency services during complex recoveries of malfunctioning trucks or heavily damaged vehicles</li> <li>Insufficient provision of emergency equipment in tow trucks (e.g. fire extinguishers, spill kits, first aid kits)</li> </ul>	3H	[REDACTED]	1L
15. Contractor, Subcontractor and Third-Party Management	<ul style="list-style-type: none"> <li>Subcontracted tow operators not meeting company WHS standards for tilt tray and recovery operations</li> <li>Inconsistent training, licensing and maintenance regimes between internal fleet and external operators</li> <li>Poor control over third-party workshops conducting maintenance on towing gear, hoists or underbody wheel lifts</li> <li>Lack of clarity about WHS responsibilities and information sharing with clients, insurers and road authorities</li> </ul>	3H	[REDACTED]	1L

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	<ul style="list-style-type: none"> <li>Contractual arrangements that incentivise speed and volume over safety and compliance</li> </ul>		<div style="background-color: black; width: 100%; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 20px;"></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/factsheets-and-resources/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.