Towing Trailers			
Business Name:		ABN:	
Business Address:			
Contact Person:	Phone:	Email:	

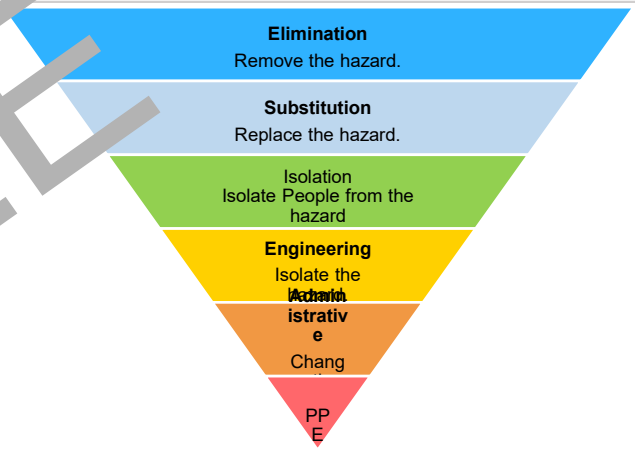
THIS RISK ASSESSMENT IS APPROVED BY THE PCBU OF THE PROJECT		
Under the Work Health and Safety Regulation (WHS Regulation), a person conducting a business or undertaking (PCBU) is required to ensure that a RISK ASSESSMENT is prepared before the proposed work starts.		
Full Name:		
Signature:	Title:	Date:

CLIENT OR PRINCIPAL CONTRACTOR DETAILS	SCOPE OF WORKS
Client:	
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, Legal Compliance and WHS Accountability	• Lack of documented WHS policy specific to towing trailers and tow-bar usage leading to inconsistent practices • Failure to align towing activities with WHS Act 2011 and relevant Australian Road Rules and vehicle standards • Unclear responsibilities between PCBUs, managers, supervisors and workers for towing safety and trailer set-up • No formal consultation with workers, health and safety representatives about towing-related risks • Inadequate due diligence by officers regarding suitability of tow vehicles, trailers and tow hooks for intended loads • Poor integration of towing safety into the organisation's overall WHS management system	High	• Develop and endorse a written WHS policy that ex[illegible]ly covers towing trailers, tow-bar usage, use of tow hooks and safe attachment methods in line w[illegible] the WHS Act 2011 and WHS Regulation • Assign clear accountability for towing safe[illegible] (e.g. fleet m[illegible]ager, workshop manager, supervisors) within the WHS governance structure, including do[illegible]mented[illegible]e descriptions • Incorporate towing trailer risks into the organis[illegible]n's formal WH[illegible] risk management procedure (identify, assess, control, review) and e[illegible]sure it is applied c[illegible]sistently t[illegible]r towing tasks • Ensure officers exercise due d[illegible]ence by regularly vi[illegible]ing towing risk assessments, maintenance data, incident trends[illegible]gislati[illegible] changes related t[illegible] vehicles and towing equipment • Implement a f[illegible]mal consu[illegible]tion pr[illegible]ess (too[illegible]x talks, safety committee, HSR forums) specifically addressing t[illegible]g trailers, [illegible]rrect tow[illegible]r[illegible]ge and selection of attachment points • Inte[illegible]e towin[illegible]raile[illegible]sks into the WHS planning cycle, including measurable objectives (e.g. training compl[illegible] audit [illegible]es, defect close-out times) • Estab[illegible]h a[illegible]d main[illegible] a legal register capturing applicable legislation, codes of practice and relevant Australi[illegible] St[illegible]ards f[illegible]owing, tow bars, safety chains and couplings, and review this at least annually [illegible]sure[illegible]l towi[illegible]related policies and procedures are readily accessible (intranet, app, depot notice boa[illegible]a[illegible]d periodically reviewed with worker feedback	Medium
2. Vehicle, Trailer and Tow-Bar Procurement and Engineering Control	• Procurement of vehicles and trailers that are not engineered[illegible]d for intended towing load[illegible]or conditions • Tow bars, hooks[illegible]nd coupling[illegible]stems that are not compa[illegible]le wi[illegible]e ve[illegible]es or trailers they are use[illegible] with • Use of non-compliant or modified[illegible]w hooks, tow points, or rec[illegible]nts for towing activities • Lack of engineering verification for aftermarket tow bars, tow hooks or attachment systems • Inadequate design of trailers leading to instability, poor load distribution and excessive ball weight • No specification for requirements such as electric brakes, breakaway systems, safety chains and rated shackles	High	• I[illegible]lement a formal procurement standard for vehicles, tow bars, tow hooks and trailers that specifies minimum compliance requirements (e.g. Australian Design Rules, relevant Australian Standards and OEM ratings) • Require all vehicles intended for towing to be supplied with manufacturer-approved towing packages, including rated tow bars, appropriate tow ball mounts and clearly identified rated attachment points • Mandate that trailers used by the organisation be purpose-built for the tasks and loads expected, with documented Gross Trailer Mass (GTM) and Aggregate Trailer Mass (ATM) ratings appropriate to the work • Prohibit the purchase or use of unverified aftermarket tow hooks or non-rated recovery points for towing, and require engineering certification for any non-standard fitment • Ensure procurement specifications include requirements for electric brake systems, breakaway units, and safety chains that match trailer mass categories, as well as compatible in-vehicle brake controllers • Include stability features in trailer design (e.g. correct axle placement, suspension type, load securing points) and specify that trailers must be suitable for road conditions (sealed, unsealed, off-road if applicable) • Require suppliers to provide documentation for all towing components, including compliance certificates, installation instructions, maximum towing and tongue load ratings • Keep a central register of all towing-capable vehicles and trailers with their approved towing configurations and limitations to prevent mismatched combinations	Medium

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
3. System for Selection and Control of Attachment Points and Tow Hooks	• Use of incorrect attachment points (e.g. tie-down points, non-rated loops or recovery points) for towing loads • Confusion between recovery hooks and towing hooks leading to misuse under continuous load • Lack of clear guidance on determining the best attachment points for different vehicle-trailer combinations • Inadequate identification or labelling of rated tow points and tow hooks on vehicles and trailers • Inconsistent practices between depots or drivers regarding which attachment methods are acceptable • Increased risk of equipment failure and detachment due to using under-rated or incorrectly oriented tow points	High	• Develop a standard procedure that defines acceptable tow points for each vehicle type, differentiating clearly between towing points and recovery points, and linking to manufacturer guidance • Maintain a database or matrix that lists each fleet vehicle and trailer, with approved attachment points, compatible tow bar types, and rated accessories (e.g. D-shackles, hitches) • Require vehicles with multiple attachment options to have rated towing points and tow hooks permanently marked or tagged (e.g. stamping, paint coding, labels) and documented in the vehicle's towing profile • Prohibit the use of non-rated tie-down brackets, bull bars, rear steps or structural members as towing attachment points through clear procedures and visual signage where practicable • Include diagrams and photographs in internal guidance documents to show the correct attachment points on common fleet vehicles and trailers and how tow hooks should be oriented and secured • Require all modifications that introduce or alter tow points or tow hooks to be designed or reviewed by a competent engineer and documented with updated instructions • Conduct periodic audits (desktop and field) to verify that workers are using only authorised attachment points and that tow hooks, shackles and pins are correctly matched and secured • Integrate assessment of attachment-point selection and tow hook usage into competency assessments and refresher training	Medium
4. Tow-Bar Installation, Configuration and Hook-Up Management	• Tow bars installed incorrectly or not in accordance with manufacturer specifications and load ratings • Inadequate system for ensuring compatibility between tow bar, towing tow ball size, coupling and safety chains • Uncontrolled variations in tow bar height leading to trailer nose-up or nose-down configurations and instability • Lack of a formal process to verify that tow bars remain securely attached to vehicles over time • Inconsistent hook-up practices, including incorrect positioning of safety chains, breakaway cables and electrical connections • No clear organisational standard for tow-bar usage procedures across different sites or operational groups	High	[redacted]	Medium

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
			[redacted]	
5. Training, Competency and Authorisation for Towing and Tow-Bar Usage	• Drivers and workers not trained in determining suitable attachment points or correctly attaching tow hooks • Lack of competency in assessing tow ratings, trailer loading limits and suitable vehicle-trailer combinations • Insufficient knowledge of organisational tow-bar usage procedures and legal obligations when towing • Uncontrolled use of towing-capable vehicles by inexperienced or unauthorised personnel • No refresher training, resulting in skill fade and poor adherence to systems over time • Supervisors not competent to verify safe towing practices and coach workers on improvements	High	[redacted]	Medium
6. Procedures, Work Instructions and Standardisation of Hook-Up Practices	• Absence of clear, written procedures for attaching tow hooks securely and hooking up tow bars • Reliance on informal knowledge and individual habits instead of documented systems • Procedures that exist but are difficult to access, overly complex or not aligned with actual work • Inconsistent tow-bar usage procedures between different business units or locations • Failure to include checks related to best attachment points, tow hooks,	High	[redacted]	Medium

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
	safety chains and electrical connections in routine processes • Procedures that do not cover non-routine situations (e.g. emergency towing, breakdowns, off-site work)		[redacted]	
7. Fleet, Tow-Bar and Trailer Inspection, Maintenance and Asset Management	• Undetected wear, corrosion or damage to tow bars, tow hooks, attachment points and trailer couplings • Inadequate maintenance scheduling for towing-related components compared to general vehicle servicing • Failure to remove from [redacted] vehicles or trailers with known towing defects • Poor record-keeping leading to uncertainty about inspection status, repairs and component replacements • No systematic approach to checking that tow hooks, shackles and safety chains remain within rating and service life • Maintenance personnel not trained or instructed to focus on towing-specific risks during inspections	High	[redacted]	Low
8. Journey Management, Planning and Operational Risk Controls	• Towing operations undertaken without prior assessment of route suitability, load, weather or timing	High	[redacted]	Medium

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
	• Use of trailers and towing combinations beyond organisational or manufacturer limits for distance, speed or terrain • Pressure to complete jobs quickly leading to shortcuts in hook-up verification and pre-tow checks • Lack of planning for breakdowns or emergencies involving towed trailers • Inadequate arrangements for safe parking, uncoupling and storage of trailers at worksites • No system to restrict high-risk towing activities (e.g. heavy loads, steep or unsealed roads) to competent drivers and suitable equipment		[redacted]	
9. Information, Communication, Signage and Documentation	• Workers unaware of current towing policies, maximum tow[illegible] capacities or hook-up requirements • Critical information on tow[illegible] attachment points and procedures not readily available at point of use • Inconsistent or outdated signage on vehicles and trailers regarding safe towing practices • Poor documentation standards leading to incomplete or inaccurate towing records and checklists • Breakdowns in communication between fleet management, workshops and operational staff about towing-related defects or restrictions • Contractors not provided with organisation-specific towing requirements when using company equipment	Medium	[redacted]	Low

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
			[redacted]	
10. Contractor, Hire Vehicle and Third-Party Interface Management	• Contractors using incompatible or poorly maintained vehicles, tow bars or trailers when undertaking work for the organisation • Hire vehicles issued without appropriate towing packages or documentation about towing limitations • Lack of control over how third parties attach to company trailers or how company vehicles tow third-party trailers • No verification that contractors' workers are competent and authorised to tow in line with organisational standards • Inconsistent expectations about determining safe attachment points and securing tow hooks w[redacted] is subcontracted • Assumptions tha[redacted] contractor systems [redacted] towing risks without verification	High	[redacted]	Medium
11. Monitoring, Audit, Incident Management and Continuous Improvement	• Inadequate monitoring of compliance with towing procedures, attachment standards and hook-up requirements • Under-reporting of incidents and near misses related to towing, tow-bar failures or incorrect attachment points • Lack of systematic analysis of towing-related incident data to identify root causes and systemic issues • No process to verify effectiveness of implemented control measures for towing activities	Medium	[redacted]	Low

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
	• Failure to capture worker feedback about practical issues with tow-bar usage procedures and attachments • Missed opportunities to improve equipment design, procedures or training as technology and best practice evolve		[redacted]	

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