

Window Cleaning

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 PCBU Oversight	<ul style="list-style-type: none"> Lack of clear allocation of WHS duties between PCBU, officers, managers, supervisors and workers for window cleaning operations at all heights Inadequate due diligence by officers to ensure resources and processes are in place to manage high-risk work such as high-rise and skylight window cleaning Absence of a documented WHS management system covering specialised tasks like waterfed pole systems, lowering and raising sashes, and sash cord adjustments Poor integration of window cleaning activities into the broader organisational WHS plan, risk register and consultation arrangements Failure to verify that subcontractors and labour-hire providers comply with WHS Act 2011 and relevant Regulations and Codes of Practice Inadequate review of incidents, near misses and industry alerts relating to work at height and fragile surfaces (e.g. skylights, old sashes) 	High	<ul style="list-style-type: none"> Establish and maintain a formal WHS management system that explicitly covers all window cleaning activities including low level, high-rise, external windows, skylights, windowsills, waterfed pole systems, and sash cord/sash adjustments Define and document WHS roles, responsibilities and authorities for PCBUs, officers, managers, supervisors, HSRs and workers ensuring accountability for work at height risk management Ensure officers exercise due diligence by periodically reviewing WHS performance, high-risk work controls and resourcing for window cleaning (including equipment budgets, training allocations and supervision levels) Integrate window cleaning hazards and controls into the organisational WHS risk register, with scheduled reviews and sign-off by senior management Implement a formal contractor and labour-hire management procedure requiring pre-qualification, WHS documentation review and performance monitoring for all window cleaning providers Establish a structured incident, near-miss and hazard reporting and investigation process focusing on systemic causes (e.g. design of work, supervision, policy gaps) for falls, dropped objects and glass failures Schedule regular management reviews (e.g. annually) of the window cleaning WHS program, referencing regulatory updates, Australian Standards and relevant Codes of Practice on managing the risk of falls 	Medium
2. WHS Risk Management Framework and Change Management	<ul style="list-style-type: none"> No consistent methodology for identifying and assessing risks associated with high-rise, at-height and skylight window cleaning Failure to consider hierarchy of control when selecting control measures for extension pole use, waterfed pole systems and access to external façades Poor change management when building design, glazing types, access methods or equipment are altered (e.g. introduction of new waterfed pole technology) Inadequate pre-commencement risk assessments for non-routine work such as sash cord adjustments, skylight 	High	<ul style="list-style-type: none"> Implement a documented risk management procedure aligned with WHS Act 2011 and WHS Regulations, mandating hazard identification, risk assessment and documented controls for all window cleaning activities Standardise risk assessment tools (e.g. task-based risk assessment templates) that specifically prompt consideration of work at height, fragile surfaces, building interfaces, extension and waterfed poles, and manual handling of sashes Embed the hierarchy of control into all risk assessments, requiring justification where higher-order controls (elimination, substitution, engineering) are not practicable for window cleaning tasks Introduce a formal change management process requiring WHS review before new buildings, access systems, cleaning products, waterfed pole systems or work methods are introduced Require consultation with workers and HSRs when developing or revising window cleaning risk assessments, with records of feedback and agreed changes Set trigger points for additional risk assessment (e.g. extreme weather, changes in building access arrangements, new façade designs, deteriorated window frames or sashes) 	Medium

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	<p>cleaning or unusual façade configurations</p> <ul style="list-style-type: none"> • Insufficient consultation with workers and HSRs when developing or reviewing risk assessments for window cleaning tasks • Failure to assess cumulative risks from weather, nearby traffic, public interface, and other contractors working above or below 		<ul style="list-style-type: none"> • Schedule periodic audits of completed risk assessments for high-rise and at-height window cleaning to ensure quality, currency and implementation of identified controls 	
3. Procurement and Design of Equipment and Systems of Work	<ul style="list-style-type: none"> • Selection of inappropriate or low-quality window cleaning equipment (e.g. extension poles, waterfed poles, anchors) not compliant with Australian Standards • Failure to consider ergonomics, reach, load ratings and compatibility of equipment with high-rise façades, skylights and old sash windows • Procurement driven solely by cost rather than WHS performance and lifecycle maintenance requirements • Lack of standardisation of equipment leading to confusion, misuse and difficult maintenance control • Inadequate design of new buildings or refurbishments to ensure safe external window cleaning access (e.g. anchors, davits, BMUs, platforms, safe access paths) • Use of non-certified or unsuitable fixing points for harnesses or rope access when cleaning high-rise external windows • No system for verifying that supplied sashes, sash cords and skylight assemblies are safe and suited to repeated cleaning operations 	High	<ul style="list-style-type: none"> • Implement a formal procurement policy that mandates WHS criteria for all window cleaning equipment including extension poles, waterfed pole systems, harnesses, lanyards, rope access gear, ladders and access equipment • Specify compliance with relevant Australian Standards, manufacturer instructions and design limits in procurement documentation and contracts • Involve competent WHS and technical personnel in selection and trialling of equipment, particularly for high-rise access, skylight cleaning methods and sash adjustment tooling • Standardise key equipment types and brands across the organisation to simplify training, inspections, maintenance and replacement controls • Integrate safe access for window cleaning into building and refurbishment design reviews, requiring permanent engineered solutions (anchors, guardrails, walkways, BMUs) wherever reasonably practicable • Require suppliers and contractors to provide documentation on load ratings, certifications, inspection schedules and safe use instructions for all high-risk equipment • Establish a pre-use approval process for any new or innovative cleaning technologies (e.g. new waterfed pole systems) that includes WHS risk assessment and field trial under supervision 	Medium
4. Competency, Licensing and Training Systems	<ul style="list-style-type: none"> • Inadequate competency of workers and supervisors in work at height principles, including use of fall arrest systems, anchor points and rope access 	High		Medium

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	<ul style="list-style-type: none"> Lack of specific training in safe use of extension poles, waterfed pole systems and techniques for preventing over-reaching and musculoskeletal strain Insufficient training in recognising structural defects in sashes, sash cords, window frames, skylights and windowsills that may fail under load Supervisors not competent to verify correct setup and use of high-rise access systems, including harnesses, anchors and rope systems No formal induction covering building-specific access arrangements, restricted areas, emergency procedures and exclusion zones around public thoroughfares Failure to provide refresher training, competency reassessment and verification of licences (e.g. for rope access or EWP use where applicable) 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
5. Safe Work Procedures and Work Instructions	<ul style="list-style-type: none"> Absence of clear, documented safe work procedures for high-rise and at-height window cleaning, including skylights and external façades Inconsistent instructions for lowering and raising sashes and adjusting sash cords, leading to potential uncontrolled movement or failure of window systems No documented limitations on the use of extension poles and waterfed pole systems near electrical hazards, in high winds or on unstable ground Procedures not tailored to different building designs, access systems, façade materials and window types (e.g. heritage sashes vs modern glazing) Safe work procedures not easily accessible to workers in the field or not integrated into daily planning and pre-start processes 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<ul style="list-style-type: none"> Over-reliance on informal verbal instructions and practices passed between workers without formal review or approval 		[REDACTED]	
6. Work at Height and Access Management Systems	<ul style="list-style-type: none"> Inadequate systems of work to prevent falls during window cleaning at height, including external façades, balconies, roofs and skylights Reliance on administrative controls rather than engineered solutions such as guardrails, walkways, anchor points or building maintenance units Uncontrolled use of ladders and makeshift platforms for reaching high windows or windowsills Poor planning for rope access, EWP use or other specialised access methods, including inadequate rescue plans Lack of documented criteria for determining when work should be done from inside the building versus from outside using harness or rope systems Insufficient control of simultaneous operations (e.g. other trades working above or below window cleaners) creating falling object interference risks 	High	[REDACTED]	Medium
7. Equipment Inspection, Maintenance and Asset Management	<ul style="list-style-type: none"> Failure of critical equipment such as harnesses, lanyards, anchor ropes, extension poles, waterfed poles and fittings due to inadequate inspection and maintenance Lack of tracking of inspection dates, service history and retire-from-service criteria for fall arrest and rope access equipment Use of damaged or worn components in sash mechanisms and skylight opening systems during cleaning operations Poor maintenance of pumps, filtration units and hoses for waterfed pole 	High	[REDACTED]	Medium

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	<p>systems leading to sudden pressure changes, leaks or erratic movements</p> <ul style="list-style-type: none"> • Unreported damage to windowsills, frames or glazing caused by prior work, increasing risk of collapse or breakage during subsequent cleaning • No systematic check on third-party supplied equipment from subcontractors or building owners (e.g. BMUs, anchors, EWPs) 		[REDACTED]	
8. Contractor, Subcontractor and Labour-Hire Management	<ul style="list-style-type: none"> • Subcontracted window cleaning crews operating under different or inadequate WHS standards compared with the principal PCBU • Lack of clarity over who controls the workplace and who is responsible for implementing specific control measures for high-rise and external window cleaning • Insufficient review of subcontractors work at height systems, competency, insurance and incident history • Inadequate induction and boarding processes for labour hire workers performing window cleaning at height or skylight tasks • Poor communication of building-specific hazards (e.g. fragile roofs, old sashes, restricted anchor points) to external providers • No system for monitoring subcontractor performance and rectifying non-conformances identified during audits or site inspections 	High	[REDACTED]	Medium
9. Planning, Scheduling and Environmental Conditions Management	<ul style="list-style-type: none"> • Inadequate planning of high-rise and external window cleaning around adverse weather conditions (wind, rain, lightning, extreme heat or cold) • Rushed work due to unrealistic timeframes, leading to shortcuts in setup, inspection and safe access arrangements 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> • Failure to coordinate with building occupants and management regarding access to internal areas for lowering/raising sashes and skylight operations • No systematic consideration of public interface, traffic management and pedestrian exposure beneath work areas • Poor planning for out-of-hours work, including lone work scenarios and reduced access to emergency assistance • Insufficient consideration of glare, reflection and visibility issues affecting safe use of extension and waterfed poles, particularly at height 		[REDACTED]	
10. Public, Building Occupant and Third-Party Interface	<ul style="list-style-type: none"> • Members of the public or building occupants struck by falling tools, cleaning equipment or glass during external or high-rise window cleaning • Uncontrolled access of tenants, visitors or other workers into work areas overhead window cleaning operations • Cleaners inadvertently entering secure or sensitive areas without appropriate authorisation or briefing • Inadequate communication with occupants about sash adjustments, skylight operations or temporary loss of use of windows and balconies • Public slips, trips or contact with water from waterfed pole runoff on footpaths and entryways • Reputational damage and regulatory scrutiny following injuries to third parties arising from poorly controlled window cleaning work 	High	[REDACTED]	Low
11. Manual Handling, Ergonomics and Occupational Health	<ul style="list-style-type: none"> • Musculoskeletal strain from repetitive movements, awkward postures and 	High	[REDACTED]	Medium

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	<p>sustained overhead work with extension and waterfed poles</p> <ul style="list-style-type: none"> Manual handling injuries from carrying, lifting and transporting equipment such as poles, hoses, ladders and buckets between levels and across sites Cumulative strain from operating on windowsills, leaning out of openings or managing heavy or stiff sashes and skylights Long-term health effects from exposure to cleaning chemicals, contaminated water or biological agents (e.g. mould around skylights and frames) Insufficient systems for early reporting of discomfort, minor injuries and signs of overuse among window cleaners Inadequate consideration of fatigue management, particularly during long shifts, hot conditions or repetitive work 		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	
12. Emergency Preparedness, Rescue and Incident Management	<ul style="list-style-type: none"> Lack of effective rescue plans for workers suspended in harnesses or ropes during high-rise and at-height window cleaning Delayed emergency response due to unclear access routes, poor communication systems or lack of coordination with building management and emergency services Inadequate first aid arrangements for falls, cuts from broken glass, chemical exposure or heat-related illness Workers unaware of procedures for dealing with failure of anchor points, roof access hatches, or uncontrolled movement of sashes and skylights Insufficient incident reporting and investigation, leading to recurrence of similar high-risk events 	High	<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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	<ul style="list-style-type: none"> No drills or testing of emergency plans for high-rise rescues or skylight fall-through scenarios 		[REDACTED]	
13. Consultation, Communication and Worker Engagement	<ul style="list-style-type: none"> Workers not consulted about practical risks and control effectiveness for window cleaning at different sites and building types Information about building-specific hazards, such as fragile skylights or deteriorated sash cords, not effectively communicated to all relevant workers and subcontractors Language barriers, literacy issues or cultural differences leading to misunderstanding of procedures and safety expectations Lack of structured mechanisms for workers to raise WHS concerns related to high-rise, skylight and external window cleaning work Poor feedback loops from incidents and audits to front-line workers, resulting in repeated errors Inconsistent communication between organisational management, site supervisors and client building managers regarding responsibilities and controls 	Medium	[REDACTED]	Low
14. Compliance, Monitoring and Continuous Improvement	<ul style="list-style-type: none"> Non-compliance with WHS legislation, Codes of Practice and Australian Standards relating to work at height and window cleaning Lack of systematic monitoring of WHS performance indicators specific to window cleaning operations Audit findings and corrective actions not implemented or closed out in a timely manner Complacency arising from frequent low-level incidents or long periods without serious harm, leading to erosion of controls 	Medium	[REDACTED]	Low

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	<ul style="list-style-type: none"> • Failure to keep up with industry best practice and technological developments for safer window cleaning methods (e.g. improved waterfed pole systems, automated façade cleaning) • Inadequate records management for training, inspections, permits and incident reports 		<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></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.