

Working on Roofs

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. WHS Governance, Legal Compliance and Due Diligence	<ul style="list-style-type: none"> PCBU officers not exercising due diligence under WHS Act 2011 leading to inadequate resourcing and oversight of work on roofs Lack of clear WHS policy specific to work at height and roof access activities Inadequate integration of roof-work risks into the organisation's WHS management system and risk register Failure to identify and comply with relevant WHS Regulations, Codes of Practice, and Australian Standards for fall prevention and roof work Poor definition of WHS roles, responsibilities, and authority for approving and controlling roof work Inadequate consultation with workers and health and safety representatives (HSRs) on roof-work systems and changes 	High	<ul style="list-style-type: none"> Establish and maintain a documented WHS management system that explicitly includes working on roofs as a high-risk work activity, with links to the WHS Act 2011, WHS Regulation, Codes of Practice and relevant Australian Standards (e.g. AS/NZS 1891 series, AS 1657) Develop a specific organisational policy on work at height and roof access, endorsed by senior management, outlining zero-tolerance for uncontrolled work on roofs and minimum mandatory controls Ensure officers exercise due diligence by receiving regular briefings on roof-work risk, reviewing incident trends, and verifying the effectiveness of control measures through audits and inspections Define and document roles, responsibilities and delegated authority for planning, approving, supervising and reviewing work on roofs (e.g. WHS manager, project manager, permit issuer, competent person for fall protection systems) Integrate roof-work risks and controls into the corporate risk register and enforce a requirement for formal risk assessment for all planned roof work Implement a process to regularly review and update roof-work procedures and controls when there are legislative changes, new guidance material, or after incidents, near misses and audits Formalise consultation arrangements with workers and HSRs regarding roof-work systems, including toolbox talks, safety committees and review of procedures Ensure contractual arrangements (including labour hire and subcontractor agreements) explicitly require compliance with organisational roof-work procedures and relevant WHS legislation 	Medium
2. Planning, Design and Engineering for Safe Roof Access	<ul style="list-style-type: none"> Building and plant design not incorporating safe permanent access to roofs, leading to reliance on temporary or improvised solutions Lack of early consultation with designers, engineers and principal contractors regarding fall-prevention design requirements Inadequate assessment of roof structural integrity and load-bearing capacity before permitting access Failure to consider weather, roof pitch, roof material, brittle surfaces, skylights and edges at the planning and design stage Inconsistent standards for fixed ladders, platforms, walkways, anchor points and guardrails across different sites 	High	<ul style="list-style-type: none"> Implement a formal design review process that requires consideration of safe access, fall prevention and rescue from the earliest stages of building and plant design, in line with WHS Regulation duties for designers Adopt an organisational standard for roof design and access systems (e.g. permanent ladders, walkways, guardrails, anchor points, roof hatches) referencing AS 1657 and relevant fall-prevention standards Require a documented engineering assessment of roof structural integrity and load limits by a competent person prior to authorising routine roof access, particularly on older or unknown structures Establish design criteria for controlling brittle and fragile roof surfaces, including designated no-go zones, safety mesh, and clearly marked walkways over brittle areas Include weather, roof pitch, access routes, proximity to power lines, and potential for falling objects in the planning documentation and Safe Design reports Standardise specifications and approval processes for installation, modification and certification of engineered controls such as guardrails, static line systems and anchor points Maintain a register and as-built drawings of all installed roof access systems, anchor points, and fall-prevention equipment, including design load ratings and inspection requirements 	Medium

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3. Roof Access Authorisation and Permit-to-Work System	<ul style="list-style-type: none"> Uncontrolled or unauthorised access to roofs by workers, contractors or visitors Roof work commencing without a formal risk assessment or verification of controls No centralised system to track who is on the roof, when, and for what purpose Inconsistent application of isolation, exclusion zones and fall-prevention requirements across different departments or sites Failure to coordinate multiple work parties on the same roof leading to congestion and conflicting activities 	High	<ul style="list-style-type: none"> Implement a mandatory roof access permit-to-work system for all non-emergency roof work, including contractors, integrated into the WHS management system Require documented task-specific risk assessments and verification of fall-prevention controls as prerequisites for issuing a roof access permit Establish clear criteria for when roof access is prohibited (e.g. certain weather conditions, after hours without supervision, when structural integrity is in doubt) Designate and train competent permit issuers with authority to approve, suspend or cancel roof access based on risk conditions Maintain a site-wide roof access log, linked to induction records and permits, to track personnel, duration of access, and scope of work Institute a coordination process (e.g. department coordination meeting or booking system) to manage multiple work groups on the same roof or adjoining roofs Integrate the roof access permit with lock-out systems for access points (e.g. locked roof hatches, access doors or ladders) so they are controlled and only opened under an approved permit 	Medium
4. Contractor and Worker Competency, Training and Induction	<ul style="list-style-type: none"> Workers and contractors accessing roofs without verified competency in work at heights Insufficient training on site-specific roof hazards, access systems, and emergency procedures Reliance on generic height training that does not address brittle roofs, skylights, steep pitches or specific plant on roofs Supervisors lacking the competence to oversee safe roof work and challenge unsafe practices Language barriers or low literacy causing misunderstanding of roof-work procedures and signage 	High	<p>[REDACTED]</p>	Medium
5. Procurement and Management of Fall-Prevention Systems and Equipment	<ul style="list-style-type: none"> Procurement of non-compliant or unsuitable fall-prevention equipment (e.g. harnesses, lanyards, anchors, guardrails) 	High	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

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	<ul style="list-style-type: none"> • Inconsistent standards across sites leading to confusion and misuse of systems • Lack of clear ownership for inspection, maintenance and replacement of fall-prevention equipment • Use of improvised or makeshift systems due to inadequate procurement planning or stock availability • Failure to ensure designed fall-prevention systems are compatible with each other and with the roof structure 		[REDACTED]	
6. Inspection, Maintenance and Verification of Roof Structures and Controls	<ul style="list-style-type: none"> • Deterioration of roofs, guardrails, anchors, static lines, walkways and ladders going undetected • Failure to recertify fall-prevention systems in accordance with manufacturer and relevant standards requirements • Inaccurate or outdated records of inspection findings and corrective actions • Inadequate systems to tag out or restrict access to defective structures or equipment • Poor coordination between building maintenance, WHS and contractors regarding structural issues on roofs 	High	[REDACTED]	Low
7. Operational Planning, Scheduling and Environmental	<ul style="list-style-type: none"> • Roof work scheduled without consideration of weather, wind, rain, temperature or visibility conditions 	High	[REDACTED]	Medium

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Conditions Management	<ul style="list-style-type: none"> • Time pressure and production demands leading to shortcuts in roof-work controls • Inadequate planning for access to tools, materials and plant on the roof, increasing manual handling and trip risks near edges • No formal process to postpone or cancel roof work when environmental conditions become unsafe • Lack of coordination between roof-work schedules and other high-risk activities (e.g. crane lifts, electrical work, confined space work below) 		[REDACTED]	
8. Interfaces with Other Services and Third Parties	<ul style="list-style-type: none"> • Uncontrolled proximity to live electrical installations, overhead power lines or communications equipment during roof access • Failure to coordinate with building occupants resulting in people entering danger zones below roof work • Inadequate management of interface between landlord, tenant, principal contractor and sub-contractors leading to roof-work responsibilities • Lack of information about hidden services within or under the roof (e.g. fragile ducting, skylights, etc.) • Third-party contractors performing roof work without aligning to the principal PCBU's WHS systems 	High	[REDACTED]	Medium
9. Emergency Preparedness, Rescue and Incident Management	<ul style="list-style-type: none"> • No practicable rescue plan for a person suspended in a fall-arrest system on a roof • Reliance solely on external emergency services without considering access constraints or response times • Workers not trained or equipped to implement a safe and timely roof rescue 	High	[REDACTED]	Medium

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	<ul style="list-style-type: none"> Inadequate communication systems for summoning assistance from roof locations Poor post-incident investigation processes leading to repeated failures in roof-work systems 		[REDACTED]	
10. Monitoring, Audit, Consultation and Continuous Improvement	<ul style="list-style-type: none"> Lack of systematic monitoring of roof-work practices leading to drift from procedures over time Infrequent or superficial audits failing to detect non-compliance with roof-work controls Workers' concerns about roof-work safety not being captured or escalated effectively No performance indicators or metrics for roof-work safety at management level Failure to learn from industry incidents and external guidance on roof-work risks 	Medium	[REDACTED]	Low

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.