

Work Health and Safety Management Plan - [REDACTED]

Compliance & Document Audit

Document audited	[REDACTED] WHS Management Plan - [REDACTED] Version 4, dated 24/04/2026
Principal Contractor	[REDACTED]
Project	[REDACTED]
Source of truth	WHS Act 2011 (Qld), WHS Regulation 2011 (Qld) (March 2026) and current Qld Codes of Practice (June 2026)
Ratings	MAJOR = legislative/currency or pervasive MOD = clear error, fix quickly MINOR = typo/consistency OK = checked, compliant

Executive Summary

This audit reviewed the WHS Management Plan for [REDACTED] Version 4, 24/04/2026) clause by clause across all 20 sections. Each legislative point was checked against the WHS Act 2011 (Qld), WHS Regulation 2011 (Qld) and current Queensland Codes of Practice (June 2026). Ninety findings were recorded: 8 major, 27 moderate, 38 minor, and 17 clauses confirmed compliant.

The good. The plan is structurally sound and its core legal machinery is correct. The high risk construction work list matches s.291 in full; the SWMS provisions match ss.299 to 312; the hierarchy of control matches s.36; the hazardous chemicals register, incident notification and site-preservation duties, plant registration, and the baseline construction amenities all align with the current Regulation. The statutory duty-holder definitions are accurate, the plan satisfies the mandatory content of Reg s.309(2), and it sensibly delegates operational detail to its subordinate procedures. It also already addresses psychosocial hazards and respirable crystalline silica, both current priorities.

The not so good. The plan reads as a capable document that has drifted out of date. Code of Practice titles are largely outdated or undated, legacy terminology recurs throughout (OH&S, MSDS, health surveillance, HSE Advisor), and there are numerous internal-consistency defects: clashing form/register numbers, duplicated paragraphs and headings, an unsigned approval page, and personnel details that no longer reflect the team.

A small number of items are wrong against current law or are materially incomplete, and these need correction now (table below). Chief among them: the health and safety committee timeframe is out of date (the Act now requires 28 days, not two months); the amenities section omits the designated female toilets that Schedule 5A requires on a large construction project like this one; the Australian Standards list is entirely defunct NOHSC documents; the regulator notification link is dead; and the key personnel (Safety Manager and Project Manager) are out of date on a current, in-use plan (which is itself still unsigned).

This document has page numbers to check against to assist quick navigation as this document is a beast.

Section-by-section findings

Section 1 - Purpose

#	Clause	Page	Finding	Recommended correction	Rating
1.1	1.1 General	p.5	"Workplace Health and Safety Legislation" - old pre-2011 term; inconsistent with Sec 7	Use "Work Health and Safety Act 2011 (Qld) & WHS Regulation 2011 (Qld)"	MOD
1.3	1.2 / 1.3 (vs 4.1 p.17, 5.1 p.21)	p.5-6	Key-personnel mismatch: [REDACTED] vs [REDACTED] (Snr PM); [REDACTED] vs [REDACTED] (GM); [REDACTED] vs [REDACTED] (Constr Mgr); [REDACTED] vs [REDACTED] (Snr Contracts)	Reconcile names/roles across Sec 1, 4, 5	MAJOR
1.4	1.4 Revision	p.5 & p.6	Version conflict: header "VERSION 4" vs schedule "Revision 2.0"	Single version scheme	MINOR
1.5	1.4 vs 1.5 review table	p.6 & p.9	Same amendment dated 19/5/2025 (schedule) and 19/5/2024 (review table)	Correct the year	MINOR
1.6	1.3 (vs 5.1 p.21)	p.5	Name spelt [REDACTED] vs [REDACTED]	Standardise spelling	MINOR
1.7	1.5 vs 4.1 (p.17)	p.7	Project description differs ("7 levels of apartments" vs "49 apartments")	Harmonise wording	MINOR

Section 2 - H&S Management System Structure

#	Clause	Page	Finding	Recommended correction	Rating
2.1	2.2 Legislation	p.12	"when dealing with OH&S management" - superseded term	Replace "OH&S" with "WHS"	MOD
2.2	2.4.2 Emergency Response Plan	p.13	Typo "location of spill skits"	"spill kits"	MINOR
2.3	2.4.1 (whole-plan check)	p.13	Mandatory-content check - plan contains all five WHS Reg s.309(2)(a)-(e) elements (responsibilities, consult/coop/coord, incident mgmt, site rules+how communicated, SWMS collect/assess/monitor/review). PASS	No action	OK

Section 3 - Document Control & Records

#	Clause	Page	Finding	Recommended correction	Rating
3.1	Sec 3	p.16	No errors - short, generic, correctly delegates detail to the Records Management / Project	No action	OK

			Administration processes		
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Section 4 - Project Description / Details

#	Clause	Page	Finding	Recommended correction	Rating
4.1	4.1 Project Manager	p.17	PM [REDACTED] outdated; current (Snr) PM is [REDACTED]	Replace with [REDACTED] across Sec 1, 4, 5	MAJOR
4.2	4.1 duration vs completion	p.17	"98 weeks" duration does not reconcile with "November 2026" completion (Jan-2024 start is ~150 weeks) – proper completion date whatever it is	Correct duration or completion date in 2027.	MOD
4.3	4.1.2 HRCW	p.18	Refrigerant lines marked "N" but mechanical services are in scope	Verify; likely change to Y; ensure SWMS covers refrigerant work	MOD
4.4	4.1.2 HRCW list	p.18	All 18 high risk construction work activities present and match WHS Reg s.291. Correct	No action	OK
4.5	4.1.2 extra rows	p.18	Duplicative bottom rows (tilt-up/precast repeats item (m); energised electrical repeats item (k))	Remove duplicates	MINOR
4.6	4.1 address	p.17	Typo "Qld4101"	"QLD 4101"	MINOR

Section 5 - Responsibilities & Authorities

#	Clause	Page	Finding	Recommended correction	Rating
5.1	5.1.1 Key Personnel (on site)	p.21	Safety role [REDACTED] HSE Advisor" is outdated; now Craig James, Safety Manager	Replace name + title throughout plan	MAJOR
5.2	5.1.1	p.21	Snr Project Manager should be [REDACTED] Finishing Foreman name + contacts blank	Update PM; complete Finishing Foreman details	MAJOR
5.3	5.1.2 Key Personnel (off site)	p.21	GM [REDACTED] vs Sec 1.3 [REDACTED]; Constr Mgr [REDACTED] vs [REDACTED]; Contracts = "TBA"	Reconcile Sec 1 vs Sec 5; fill TBA	MAJOR
5.4	5.1.2 GM email	p.21	Domain typo [REDACTED] (missing s)	Correct email domain	MINOR
5.5	5.2.2 role titles	p.22-31	Safety role named 5 different ways (HSE Advisor / WHS Advisor / QSE Safety Advisor / Safety Officer / Safety Advisor)	Standardise to "Safety Manager"	MOD
5.6	5.2.1 statutory definitions	p.22-24	PCBU (s.5), primary duty (s.19), officer due diligence (s.27), worker (s.7), other persons (s.29) accurate to Qld WHS Act	No action	OK
5.7	5.2.2 HSR	p.29	Legacy term "occupational health and safety" + "statutory	Use "WHS"; drop "each state"	MINOR

			provisions in each state"		
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Section 6 - Induction, Training & Competency

#	Clause	Page	Finding	Recommended correction	Rating
6.1	6.1 other-state content	p.33	Other-state card rules incl. incorrect claim "ACT, NT and Tas do not require construction induction" - White Card is national (Qld Reg s.316/317)	Delete other-state content; reference Qld Reg ss.316-319	MOD
6.2	6.4.2	p.35	Typo "Scaffolding (basic, immediate & advanced)"	"intermediate"	MINOR
6.3	6.4.4	p.36	Garbled "Vehicle loading cranes under 10 metres tonnes"	"10 metre tonnes"	MINOR
6.4	6.3 / 6.4	p.34-35	"HSE Advisor" title used	Update to Safety Advisor or Managers title	MINOR
6.5	6.1-6.4	p.33-37	White Card 2-yr rule (s.316/317), HRW licence classes, HSR 5-day + 1-day training (Reg 21), EWP/scaffold thresholds, CPR/first-aid renewals - all correct	No action	OK

Section 7 - Legal and Other Requirements

#	Clause	Page	Finding	Recommended correction	Rating
7.1	Intro link	p.38	Dead regulator link deir.qld.gov.au (DEIR abolished)	Use worksafe.qld.gov.au	MOD
7.2	Intro link	p.38	Old legislation link path	legislation.qld.gov.au	MINOR
7.3	7.1.1 / 7.1.2	p.38	"WH&S Qld Act 2011" / "WHS Regulations 2011" wrong titles	Work Health and Safety Act 2011 (Qld) / Regulation 2011 (Qld) (singular)	MOD
7.4	7.1.1 / 7.1.2	p.38	"Workers Compensation Act 2003 / Regulation 2014"	Workers' Compensation and Rehabilitation Act 2003 (Qld) / Regulation 2014 (Qld)	MOD
7.5	7.1.3 Codes of Practice	p.38-39	Code titles outdated/undated throughout (e.g. Confined spaces CoP 2021; Mobile crane CoP 2024; psychosocial "at work" CoP 2022); "Formwork CoP" has no current Qld equivalent	Update to current Qld titles + years; remove/verify Formwork CoP; do NOT add a Construction Work CoP (Qld has none)	MOD
7.6	7.1.4 Australian Standards	p.39	Entire list is defunct NOHSC documents (NOHSC abolished 2005); mislabelled "Australian Standards"	Replace with SWA Workplace Exposure Standards + actual current AS/NZS standards	MAJOR

Section 8 - Project Risk Management

#	Clause	Page	Finding	Recommended correction	Rating
8.1	8.3 SWMS	p.41-42	SWMS content matches Qld Reg s.299(2); compliance (s.300), contractor copy to PC (s.301), PC obtain copy (s.312) reflected. Correct	No action	OK
8.2	8.3.1 / 8.3.2	p.43	Non-statutory term "High Risk Construction Activity"	Standardise to "high risk construction work"	MINOR
8.3	Sec 8	p.40-44	"HSE Advisor" carry; JSA/JSEA/SOP used interchangeably	Align terms	MINOR

Section 9 - Safety in Design

#	Clause	Page	Finding	Recommended correction	Rating
9.1	Sec 9	p.45	No errors - design process reads correctly and delegates detail to the Managing Design process	No action	OK

Section 10 - Safety in Purchasing

#	Clause	Page	Finding	Recommended correction	Rating
10.1	10.2 Hazardous Chemicals	p.46-47	Hazardous chemicals register (list + current SDS, accessible) matches Qld Reg s.346; SDS provision s.344. Correct	No action	OK
10.2	10.2	p.47	"isocyanides" - wrong chemical; Qld Reg Schedule 14 item 8 is "isocyanates"	"isocyanates"	MOD
10.3	10.2	p.47	"Health surveillance" - statutory term is "health monitoring" (Qld Reg s.368)	"health monitoring"	MOD
10.4	10.2	p.46	Legacy term "hazardous substances"	"hazardous chemicals"	MINOR

Section 11 - Safety in Construction

#	Clause	Page	Finding	Recommended correction	Rating
11.1	11.1 Hierarchy of control	p.48	Order (eliminate > substitution/isolation/engineering > administrative > PPE) matches Qld Reg s.36. Correct	No action	OK
11.2	11.2 document refs	p.49	Register IDs inconsistent: [REDACTED] vs [REDACTED] named two ways	Fix to one correct form-number + name	MOD
11.3	11.3	p.50	Duplicated paragraph (verbatim)	Delete duplicate	MINOR

	Defective Work				
11.4	11.2.5 / 11.3	p.49-50	"HSE Advisor" carry; "High Risk Construction Activities" -> "work"	Align terms	MINOR

Section 12 - Emergency Preparedness & Response

#	Clause	Page	Finding	Recommended correction	Rating
12.1	Sec 12	p.51	Addresses Qld Reg s.43 elements (response, evacuation, notify services, medical, communication, training, drills) and correctly delegates operational detail to [REDACTED] [REDACTED] No WHSMP-level error	No action	OK

Section 13 - Communication & Consultation

#	Clause	Page	Finding	Recommended correction	Rating
13.1	13.1.1 HSC formation	p.52	Says committee must be formed "within 2 months" of a request by an HSR or 5+ workers; WHS Act s.75 now reads "as soon as practicable but no later than 28 days"	Change to "as soon as practicable but no later than 28 days" (both triggers)	MAJOR
13.2	13.1.2 / 13.1.3	p.52	Half-members-not-nominated matches s.76; 3-monthly meetings matches s.78. Correct	No action	OK
13.3	13.8 Dispute Resolution	p.56	Internal contradiction: heading "Minor issue: Within 24 hrs" but body says resolve "within 72 hrs"	Correct minor-issue heading to 72 hrs	MOD
13.4	13.8 escalation	p.56	"mediation with the regulator" - statutory route is ask regulator to appoint an inspector to assist	Reword to statutory mechanism	MINOR
13.5	13.2 + 13.8	p.53,55	Duplicate "DISPUTE RESOLUTION" heading	Merge / renumber	MINOR
13.6	13.8 / 13.4	p.54-56	Typos: "HE Advisor", "OHS, issue", "Pre-Stats", "field on site", "cannot be resolve"	Clean up	MINOR

Section 14 - Plant Management

#	Clause	Page	Finding	Recommended correction	Rating
14.1	14.1 / 14.2	p.57-	Plant design + item registration	No action	OK

		58	(Qld Reg s.243/s.245, Schedule 5) - tower crane, hoist, concrete booms, mobile cranes >10t covered. Correct		
14.2	14.3 / 14.4	p.58-60	Mobile-plant records, inspections, lifting/fall test-tag - adequate; AS/NZS refs legitimate	No action	OK
14.3	14.5 Electrical	p.60	"Electrical Installation Commissioning Report" has two form numbers [REDACTED] vs [REDACTED]	Use one correct form number	MOD
14.4	14.5	p.60	"HSE Advisor" carry	Align title	MINOR

Section 15 - Protective Equipment / Amenities

#	Clause	Page	Finding	Recommended correction	Rating
15.1	15 PPE list	p.61	PPE minimums adequate; AS/NZS references legitimate	No action	OK
15.2	15.1 heading	p.61	"Health Surveillance" heading; statutory term is "health monitoring" (Qld Reg s.368)	Re-title Health Monitoring	MOD
15.3	15.2 Amenities	p.62	Figures match Qld Reg Schedule 5A (toilets 1/15 s.2B; multilevel s.2C; water 30m/every 2nd level s.7; meal room s.5; washing s.6). Correct	No action	OK
15.4	15.2 Amenities	p.62	No designated female toilet provisions in the ERP. (these are present onsite though) As a large construction project, [REDACTED] requires 1 designated female toilet per 100 (or part of 100) persons in addition to general toilets, regardless of headcount (Sch 5A s.2B(2)); located on ground/4th/every 3rd level incl. 4th below ground (s.2C); with signage + restricted access (s.2E). The \$7.5m figure only sorts large from small, it does not decide whether female toilets are required.	Add designated female toilet regime per Sch 5A s.2B(2)/2C/2E	MAJOR
15.5	15.2 Amenities	p.62	Above-ground only; Schedule 5A s.2C also covers below-ground levels (basement/undercroft)	Add below-ground level provision	MINOR

Section 16 - Site Rules and Site Behaviour

#	Clause	Page	Finding	Recommended correction	Rating
16.1	16.4 Unsafe Behaviour	p.65	Wrong cross-reference: remedying unsafe conditions points to "Psychosocial Hazards procedure" (pasted from 16.3)	Point to the correct unsafe-behaviour/disciplinary procedure	MOD
16.2	16.7 Delivery & Storage	p.66	Copy-paste: first sentence duplicates 16.6 and refers to "construction waste" under a Delivery/Storage heading	Rewrite 16.7 for delivery/storage of materials	MOD
16.3	16.3 policy list	p.64	POL 09 "Workplace Harassment & Discrimination Policy" vs Appendix "Workplace Harassment Policy"	Make policy title consistent	MINOR
16.4	16.3.1	p.64	Typo "summarsied"	"summarised"	MINOR
16.5	16.3.1	p.64	US spellings "organization", "utilizing"	Use AU "-ise"	MINOR
16.6	16.8	p.66	Plan calls itself "Safety Management Plan" / "QSE WHS Plan" - inconsistent title	Use one consistent document title	MINOR

Section 17 - Incident & Corrective Action

#	Clause	Page	Finding	Recommended correction	Rating
17.1	17.1.3 Notifiable incidents	p.67	"report immediately and within 24 hrs complete Form 3" - Qld WHS Act s.38 written-notice period (on regulator request) is 48 hours	Clarify 24 hr is internal, or correct to 48 hrs	MINOR
17.2	17.1.3 scene preservation	p.68	Incident-site exceptions match Qld WHS Act s.39(3); notify WHSQ immediately matches s.38. Correct	No action	OK
17.3	17.1 numbering	p.67	Heading jumps from "17" to "17.1.1" - no parent "17.1" heading	Add 17.1 heading	MINOR
17.4	17.1.1-17.1.4	p.67-69	"HSE Advisor" carry	Align title	MINOR

Section 19 - Site Rules

#	Clause	Page	Finding	Recommended correction	Rating
19.1	19.2 SWMS	p.72	Equates JSEA with SWMS and ties a SWMS to "medium or high-risk rating"; a SWMS is for high risk construction work (Qld	Reserve SWMS for HRCW; do not equate with JSEA	MOD

			Reg s.291/299)		
19.2	19.9 + 19.10	p.73	Duplicate "TRAFFIC CONTROL" heading and sentence	Delete the duplicate clause	MOD
19.3	19.26 Hazardous Substances	p.76	Outdated "Material Safety Data Sheets / MSDS" - under the WHS Reg (GHS) it is "Safety Data Sheet (SDS)"	MSDS -> SDS	MOD
19.4	19.5 Alcohol & Drugs	p.73	Typo "fellow workers or member so the public"	"members of the public"	MINOR
19.5	19.6 Safety Awareness	p.73	"OHS representative" - Qld term is health and safety representative (HSR) / WHS	"HSR"	MINOR
19.6	19.3 Housekeeping (Silica)	p.72	Silica dust controls present and sound (wet methods, cleanup, dry-sweep approval, barricades/vacuum)	No action	OK

Section 20 - Appendices Summary (forms register)

#	Clause	Page	Finding	Recommended correction	Rating
20.1		p.78	Number clash: appendix = "Emergency Equipment Checklist" but body (Sec 12) uses for the Site Specific Emergency Response Plan	Pick one number for the Emergency Response Plan; fix body or appendix	MOD
20.2		p.78	Same form number used for two documents: "Audit Report" and "Quality Management Plan"	Re-number one	MOD
20.3		p.80	"Fall Equipment Register" listed twice	Delete duplicate	MINOR
20.4		p.80	Wrong prefix - sits in Excavation folder	Fix prefix to	MINOR
20.5		p.81	Wrong prefix - sits in Mobile Plant folder	Fix prefix to	MINOR
20.6	Services Isolation Permit	p.80	Malformed + wrong prefix - FORM -06"; body cites	Standardise to one number	MOD
20.7	Electrical forms	p.80	Appendix form numbers do not match body	Reconcile electrical form numbers body <-> appendix	MOD
20.8	register list	p.77-78	Omits (Document Control Register) and (SWMS Register), both referenced in the body	Add the missing registers	MOD