



Australian Government

Department of Employment and Workplace Relations
Office of the Federal Safety Commissioner



Common concerns and possible solutions for the WH13 Audit Criteria

Safe Work Month 2025

The WH13 (Emergency Preparedness and Response) audit criteria for the Work Health and Safety Accreditation Scheme is focused on the documented processes a company has developed to support emergency management. This resource addresses common concerns with the WH13 audit criteria and possible solutions that may improve a company's performance.

This document has been prepared with the assistance of a Federal Safety Officer but is for information only and does not prescribe exact requirements for meeting the WH13 or other Scheme criteria. Other solutions may be more appropriate depending on your operating environment, refer to the [Audit Criteria Guidelines](#) for more details.

WH13.1

There is a documented process to identify potential emergency situations for this project

Common Concerns

- While the company is able to present their standard emergency procedures, their documented process provides limited information on how the project's likely emergency scenarios are determined. For example,
 - who determines the project's possible emergency scenarios?
 - when are emergency situations determined?
 - the method of recording the project's emergency situations is not defined.

- The emergency management plan does not identify all of the project's applicable emergency scenarios (e.g. the rollover of plant or equipment or contact with overhead/underground services are not addressed, although these risks apply to the site).

Possible Solutions/Improvements

- All emergency situations are determined within the Project Risk Assessment (PRA). These can be recorded as a separate 'Emergency Management' section within the Project Risk Assessment, or individually against each of the identified major risk categories within the document.
- Emergency scenarios are identified from a listing of project hazards or a basic risk assessment process within the Emergency Management Plan (EMP) document.
- Emergency scenarios external to the project that could impact project workforce are identified e.g. client emergencies on shared sites such as hospitals, major hazard facilities, refineries etc.

WH13.2

There is a documented process to ensure procedures/plans are developed and regularly reviewed for identified emergency situations

Common Concerns

- The documented process is generic and does not focus on development of procedures for identified site-specific emergency situations.
- The frequency for 'regular' review of emergency procedures is inadequate for the project duration and/or the general duration of projects delivered by the company e.g. reviews are to occur annually, however most of the company's projects are delivered within a year.
- The documented process focuses on administrative updates rather than whether there is a change in risk or workplace change which could impact how emergency procedures are to be executed e.g. phased handover of projects etc.

Possible Solutions/Improvements

- A defined documented process for the initial development of emergency procedures e.g. a review of Project Risk Assessment or other similar documents by project team, and incorporation of it within the Emergency Management Plan.

- An overarching requirement within the documented management system to ensure emergency procedures remain current as the project progresses.
- Clearly defined criteria which trigger ongoing review of emergency procedures and/or reviews are incorporated alongside other review processes (e.g. the Site Emergency Management Plan is reviewed as part of the quarterly review of the Project Risk Assessment and Site Safety Plan document).

WH13.3

There is a documented process to ensure emergency response arrangements are communicated to all personnel and visitors.

Common Concerns

- An over reliance on displaying information on site noticeboards.
- A lack of effective communication which focuses on information being received, understood and acknowledged by the recipient.

Possible Solutions/Improvements

- Maintaining separate defined documented methods for communicating emergency information for both workers and visitors.
- Utilising a multi-layered approach – Emergency information is graphically presented within project induction presentations, and an acknowledgement process is to be completed by workers within the project induction regarding receipt of emergency information. This can be supplemented with information displayed on noticeboards and within the site (e.g. posting site evacuation diagrams within defined site locations such as at exit doors/stairwells).
- The definition of ‘visitors’ is clearly defined in documented management system (e.g. those attending site for less than 2 hours and/or those not completing trade work). This removes ambiguity in how a project’s emergency procedures are communicated.
- The communication of emergency information is embedded within the site’s electronic visitor sign in process. The process also includes other controls to manage visitor safety, such as remaining under escort of an inducted worker whilst onsite.
- Outlining defined methods for communicating changes to emergency procedures e.g. changes to evacuation routes are recorded on the site layout plan and are communicated to the workforce via pre-start meetings/toolbox talks.

WH13.4

There is a documented process to ensure designated emergency personnel for the project:

- have been inducted in the site-specific emergency procedures/plans; and
- have obtained any qualification or formal training defined by the company as required to fulfill the role

Common Concerns

- Workers are not inducted into their specific emergency positions on the project. For example, a generic induction of workers which references their project position rather than their allocated emergency response role is undertaken.
- Limited evidence is presented to confirm that those workers with allocated emergency response roles have been trained in their specific duties and responsibilities and/or the content of the Emergency Management Plan.

Possible Solutions/Improvements

- Use of the EMP to capture all elements of this sub-criterion i.e. the EMP contains the documented duties and responsibilities of emergency response roles and the induction requirements and formal training/qualification requirements for those with allocated emergency roles on the project.
- Emergency management related training requirements are detailed within the company's wider management system e.g. a Training Needs Analysis or Learning Management System.

WH13.5

There is a documented process to ensure emergency practice drills:

- are scheduled and carried out on site;
- are scenario based and test a variety of the identified potential emergency situations;
- are recorded and evaluated for effectiveness; and
- incorporate a process for the identification and management of corrective actions.

Common Concerns

- The EMP requires annual drills, however, most of the company's projects are delivered in under a year.
- Drills do not address all possible emergency scenarios that could occur on the site, or the scenarios are general in nature e.g. general site evacuation.

Possible Solutions/Improvements

- Inclusion of clearly defined criteria for the scheduling of drills (e.g. the first drill needs to occur within 3 months of project inception and at six months intervals thereafter).
- The scheduling of the initial emergency drill by the project team occurs at the project inception phase through the Project Risk Assessment workshop.
- Emergency drills based on the specific risks determined in the Project Risk Assessment workshop are scheduled at the project inception.
- Emergency drills are scheduled through automated activity schedules, so they are less reliant on one person driving the process: with drills being highlighted as overdue if not completed within required timeframes.
- Actions from emergency drills are captured in the company's electronic corrective management system. The emergency drill form also includes a link for raising and assignment of corrective actions.
- For companies that do not have an electronic corrective action management system, the identification and assignment of corrective actions are incorporated within the emergency drill form.
- The completion of drills drive improvements to site emergency procedures e.g. new /additional emergency equipment is purchased etc.

WH13.6

There is a documented process to ensure a qualified person identifies site first aid equipment and requirements in accordance with relevant legislation, codes of practice and Australian standards

Common Concerns

- The lack of a definition of a ‘qualified person’ relating to first aid, or the person who completed the assessment did not hold the required qualification as defined by the company.
- The First Aid Risk Assessment process does not align well with the requirements of the applicable legislative and other requirements e.g. Victorian First Aid Compliance Code, First Aid Code of Practice in other states/territories.
- The lack of a defined process such as the requirement for onsite checks to ensure arrangements are in place as per the initial assessment completed.

Possible Solutions/Improvements

- The First Aid Risk Assessment includes input from the ‘project team’ at project inception. This process ensures combined expertise with completed sign off by the position who holds the required first aid related qualification.
- Checks for completion of the first aid assessment process are undertaken, including checks of installed items through the company’s Site Establishment Checklist.
- Ongoing first aid checks against the initial first aid risk assessment are completed through the site inspection process.
- A requirement for the periodic review of the completed first aid assessment for longer duration projects (i.e. projects over 24 months).
- The First Aid Requirements are determined through a risk-based approach. The First Aid Risk Assessment identifies the site as being either a low, medium or a high-risk workplace. A set of minimum first aid resources are required for each of the identified risk levels.

WH13.7

There is a documented process to ensure a competent person identifies site emergency equipment and requirements.

Common Concerns

- The company’s definition of a ‘competent person’ does not include any specific emergency management related competency.
- The identification of emergency equipment does align to the specific hazards and potential emergency scenarios that could occur on the site.
- The placement and location of emergency equipment on the site is not well defined in the company’s emergency equipment assessment process.

- Emergency equipment is not in place on the site as per the initial emergency equipment assessment process.

Possible Solutions/Improvements

- The first aid and emergency equipment assessment processes are combined to form a consistent approach and methodology.
- A comprehensive listing of various emergency equipment types is included within the site emergency assessment form, preventing an applicable emergency being inadvertently omitted.

WH13.8

There is a documented process to ensure inspection, test and maintenance requirements for emergency and first aid equipment are identified, scheduled and undertaken.

Common Concerns

- An over reliance on the site inspection process to ensure first aid and emergency equipment is maintained in line with its required frequencies.

Possible Solutions/Improvements

- Inspection and maintenance requirements are determined from the site specific first aid and emergency assessment process. This includes inspection frequencies, responsibilities and record requirements for these items.
- Inspection and maintenance requirements for common first aid and emergency equipment are included in the documented management system (e.g. Safety Plan, Emergency Management Procedure, Site Inspection and Maintenance Register).
- Registers are maintained and track the inspection and maintenance status of the site's first aid and emergency equipment. These can be in either in electronic or traditional hard copy format.

WH13.9

There is a documented process for managing critical incidents, including:

- the company's definition of a critical incident;
- clearly defined roles;
- return-to-work of injured workers;
- employee assistance/counselling; and
- the process for review of the effectiveness of critical incident response procedures.

Common Concerns

- The five distinct elements of this sub-criterion are not addressed.
- There are no existing arrangements in place for employees to access assistance/counselling, rather they will be provided on as 'needs basis'.
- There is a limited defined process for how the critical incident response procedure will be reviewed for effectiveness; for example, who will be involved in the review, when it will occur, and what inputs will be incorporated within the review process.
- The company does not have an appropriate definition of a 'critical incident' and focuses on only 'serious incidents' with limited emphasis on whether an incident is likely to affect the wider community or cause damage to their reputation.

Possible Solutions/Improvements

- The company's existing counselling and psychological arrangements are communicated, including how and when employees can access such services.
- A comprehensive documented process and accompanying flowchart which addresses when and how a critical incident is declared, the assembly of a critical incident management team, clearly defined roles and responsibilities, how the response is reviewed for effectiveness, and how the return-to-work of injured workers is managed.
- Although not mandatory, the involvement of senior management in the critical incident response.
- A defined process for reviewing the effectiveness of the critical incident response e.g. a specialist paper or report produced by the Safety Manager for inclusion within the company's management review process or for a senior leadership meeting.

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