

WHS Leadership & Governance

Accreditation Readiness Workbook | August 2026

Practical guidance and tools for residential and construction businesses preparing for OFSC WHS Accreditation.



How to use this workbook

Understand what good leadership and governance look like, test your current readiness and build a stronger evidence trail.

PURPOSE

Use this workbook to understand what good leadership and governance look like in practice, identify gaps, strengthen evidence and prepare your leaders and project teams for accreditation audit conversations.

What you should get from it

- ▶ Clear senior management Work Health & Safety (WHS) responsibilities and involvement.
- ▶ WHS objectives and performance reporting that drive decisions.
- ▶ Role-specific WHS and due diligence training.
- ▶ Regular senior management site visits that include genuine WHS discussion with workers.
- ▶ Evidence that leadership commitments are implemented, recorded and followed through.

A simple way to work through the resource

01

UNDERSTAND

Know what accreditation-ready leadership looks like.

02

CHECK

Test your current systems and evidence.

03

STRENGTHEN

Use the practical tools to close priority gaps.

04

EVIDENCE

Build a traceable record of implementation.

05

PREPARE

Practise the conversations leaders may need to have at audit.

IMPORTANT

Office of the Federal Safety Commissioner (OFSC) accreditation does not replace State or Territory WHS/Occupational Health and Safety (OHS) HS legislation. The applicable jurisdictional laws continue to apply to the construction work. This workbook focuses on the additional OFSC governance, assurance and implementation evidence a builder may need to demonstrate. It is a readiness resource and does not guarantee accreditation or legal compliance.

Why leadership and governance matter

For OFSC accreditation, leadership is not demonstrated by a WHS policy alone.

The Residential Builders' Guide tests whether senior managers participate in risk management, review WHS performance, receive relevant training and regularly engage with projects and workers on WHS matters.

ACCREDITATION LENS

The audit process looks beyond the existence of a WHS management system. It tests whether documented requirements are implemented consistently in practice and supported by evidence. OFSC accreditation adds a more formal layer of governance, auditing, assurance, reporting and contractor-management evidence.

What this means in practice

DOCUMENTED	Your system says who the senior managers are, what WHS activities they must participate in, how often they do them and how this is recorded.
VISIBLE	Senior leaders are seen participating in Hazard Identification, Risk Assessment, and Control (HIRAC), reviewing WHS performance and visiting projects.
CONNECTED	Builder-level objectives, project-level WHS priorities and site actions align.
RECORDED	Meeting minutes, approvals, site visit records, risk review records and training evidence show that leadership activity occurred.
FOLLOWED THROUGH	Issues identified by leaders result in decisions, owners, due dates and verified close-out.

Where this category maps to the OFSC guide

- ▶ FP1.1 - senior management participation in the builder HIRAC process.
- ▶ FP1.2 - WHS reports monitor performance against objectives and targets, are reviewed by senior management and are communicated to site management.
- ▶ FP1.3 - senior managers, site managers and supervisors receive role-relevant training in WHS obligations, due diligence and the builder WHS management system.
- ▶ FP1.4 - senior managers regularly visit sites and discuss WHS issues with site management and workers.

What good looks like

Compare your current practice with stronger accreditation-ready practice. The aim is not to create paperwork; it is to make leadership activity deliberate, visible and auditable.

AREA	WEAK / INFORMAL PRACTICE	STRONGER ACCREDITATION-READY PRACTICE
Policy & accountability	A policy exists, but senior roles are unclear.	Senior roles and decision rights are defined and understood, including who participates in risk review, performance review and site assurance.
Risk management	Senior managers receive risk information after decisions are made.	Senior managers participate at defined points in builder and project HIRAC and their involvement is recorded.
Performance reporting	Reports focus mainly on injuries and incidents.	Reports use leading and lagging indicators, compare performance to objectives, prompt decisions and are communicated back to project/site teams.
Training	Leaders rely on experience or generic construction induction.	Senior managers, site managers and supervisors receive role-specific training on duties, due diligence and the builder's WHS system.
Site visits	Senior leaders attend sites for commercial or program reasons.	Senior leaders conduct scheduled WHS visits, speak directly with site management and workers, verify critical controls and record follow-up actions.
Action close-out	Actions are marked complete when a task is done.	Leaders verify significant actions are implemented and, where relevant, effective at reducing risk.

Your four readiness levels

Use the level that best describes the consistency and evidence behind your current leadership system.

1

NONE AT ALL | Establish

What it means: No clear governance process, defined senior management WHS roles or consistent evidence of leadership involvement.

Your focus: Create responsibilities, reporting rhythms, training requirements and site engagement expectations.

2

GETTING STARTED | Implement

What it means: Some leadership activity occurs, but it may be informal, person-dependent or inconsistently recorded.

Your focus: Make the process repeatable, communicate it and start retaining evidence.

3

BUILDING THE FOUNDATIONS | Embed

What it means: Core systems are established, but consistency across projects, leaders or reporting cycles needs strengthening.

Your focus: Standardise, monitor and verify that leadership activity is occurring as intended.

4

STRENGTHENING IMPLEMENTATION | Assure and improve

What it means: Leadership systems are operating and evidence is available. The focus is on quality, effectiveness and continuous improvement.

Your focus: Analyse trends, test effectiveness and use leadership assurance to improve project performance.

DO NOT TREAT A HIGH SCORE AS COMPLETION

A strong diagnostic result means the business appears to have stronger foundations. Formal accreditation still depends on the OFSC application and on-site audit process.

Leadership & Governance Readiness Check

Use Yes / Partly / No and note the evidence you can actually produce. If you answer Yes but cannot locate evidence, treat the item as Partly until the evidence trail is clear.

#	READINESS QUESTION	Y / P / N	POSSIBLE EVIDENCE
1	Have senior management roles been formally identified for WHS governance purposes?	Yes [] Partly [] No []	Position descriptions; governance matrix; WHSMS responsibility table
2	Does the WHSMS define where senior managers must participate in HIRAC?	Yes [] Partly [] No []	HIRAC procedure; risk workshop requirements; approval/sign-off points
3	Can you show recent senior management participation in builder or project risk review?	Yes [] Partly [] No []	Risk register review minutes; workshop attendance; approvals
4	Are builder and project WHS objectives and targets defined and aligned?	Yes [] Partly [] No []	WHS plan; project WHS plan; objectives register
5	Are WHS performance reports produced at a defined frequency?	Yes [] Partly [] No []	Monthly/quarterly reports; dashboard; project reports
6	Do reports include both leading and lagging indicators?	Yes [] Partly [] No []	Inspections; critical control checks; actions; consultation; incidents; injuries
7	Is senior management review of WHS performance recorded?	Yes [] Partly [] No []	Minutes; decisions; approvals; assigned actions
8	Are relevant outcomes communicated back to site/project management?	Yes [] Partly [] No []	Project meeting minutes; action notices; email records; toolbox cascades
9	Are senior managers, site managers and supervisors trained in role-relevant WHS duties and due diligence?	Yes [] Partly [] No []	Training matrix; course content; attendance records
10	Are they also trained in the builder-specific WHSMS requirements relevant to their role?	Yes [] Partly [] No []	WHSMS induction/training material and records
11	Is there a defined senior management site visit frequency?	Yes [] Partly [] No []	Procedure; schedule; calendar; assurance plan
12	Do senior management site visits include WHS discussions with workers and site management?	Yes [] Partly [] No []	Completed visit record; discussion notes; worker feedback

13	Do site visits include verification of actual work, controls or SWMS implementation?	Yes [] Partly [] No []	Observation records; photos where appropriate; inspection notes
14	Are issues from leadership activities assigned, tracked and closed?	Yes [] Partly [] No []	Action register; owners; due dates; close-out evidence
15	For significant actions, is effectiveness checked rather than completion only?	Yes [] Partly [] No []	Follow-up verification; repeat inspection; management review

USE THE EVIDENCE TEST

If the process exists but you cannot locate a recent implementation record, treat the item as Partly until the evidence trail is clear.

Tool 1: Leadership roles & accountability

Use this matrix to make WHS leadership responsibilities explicit. Adapt role titles to your structure and keep accountability above project-level management where the OFSC criterion refers to senior managers.

ROLE	WHAT THEY ARE ACCOUNTABLE FOR	EVIDENCE TO RETAIN
Director / CEO / Managing Director	Set expectations; ensure resources; review material WHS performance; participate in defined HIRAC; approve significant risk decisions; undertake site engagement.	Quarterly management review; HIRAC approvals; site visits; decisions and actions.
Senior operational leader / Construction Manager	Review project risk and performance; escalate systemic issues; support project teams; verify implementation across projects.	Project reviews; risk workshops; assurance visits; action follow-up.
WHS Manager / Adviser	Maintain WHSMS; provide analysis and technical advice; coordinate reporting and assurance; identify trends and gaps.	Reports; audit findings; training records; system updates.
Project Manager	Implement project WHS requirements; coordinate subcontractors; review risks and actions; report performance upward.	Project WHS plan; risk register; subcontractor reviews; project reports.
Site Manager / Supervisor	Lead day-to-day implementation; consult workers; verify controls; stop or escalate unsafe work.	Pre-starts; inspections; SWMS observations; corrective actions; consultation records.
Workers / Subcontractors	Follow agreed controls; participate in consultation; report hazards and incidents; provide task-specific information.	SWMS participation; toolbox records; hazard reports; feedback.

MINIMUM DECISIONS TO DEFINE

Define who counts as senior management and where they must participate in HIRAC. Set the WHS performance review and site visit frequency, plus how outcomes are recorded and communicated. Define which roles require due diligence and builder-specific WHSMS training.

Tool 2: Senior management WHS review

A management review should do more than receive statistics. It should test whether risk controls and project systems are working, identify emerging issues and record decisions.

AGENDA ITEM	QUESTIONS TO ASK	DECISION / ACTION
Objectives & targets	Are builder and project objectives aligned? What is off track? What decision is required?	Owner: _____ Due: _____ Evidence: _____
Critical risks / HIRAC	What has changed? Are any risks above tolerance? Where is senior management input required?	Owner: _____ Due: _____ Evidence: _____
Incidents & near misses	What patterns or serious potential events need escalation or systemic action?	Owner: _____ Due: _____ Evidence: _____
Corrective actions	Which actions are overdue, recurring or not yet verified as effective?	Owner: _____ Due: _____ Evidence: _____
Subcontractor performance	Are repeated non-conformances, capability issues or poor-performing contractors emerging?	Owner: _____ Due: _____ Evidence: _____
Training & competency	Are there gaps in licences, VOC, supervisor capability or WHSMS training?	Owner: _____ Due: _____ Evidence: _____
Worker health	Any silica/dust, noise, hazardous chemical, fatigue, heat or health monitoring concerns?	Owner: _____ Due: _____ Evidence: _____
Critical controls	What assurance tells us the most important controls are actually present and effective?	Owner: _____ Due: _____ Evidence: _____
Consultation	What are workers raising? Are issues being resolved and fed back?	Owner: _____ Due: _____ Evidence: _____
Audits & inspections	What recurring findings or cross-project trends need management intervention?	Owner: _____ Due: _____ Evidence: _____

Tool 3: Senior leadership site visit

This is not intended to duplicate a supervisor inspection. The purpose is to demonstrate leadership engagement, verify that the WHSMS is visible in the field and create a direct line between senior management, site management and workers.

Project		Senior manager	
Date		Site contact	

Ask, observe and verify

FOCUS	PROMPT	NOTES / ACTION
Critical risks	What are the three most important risks on this project right now? What controls must not fail?	
Change	What has changed recently in design, program, subcontractors, plant or work sequence? How was the risk reassessed?	
SWMS / work as done	Select one high-risk activity. Does the work being performed match the SWMS and controls?	
Subcontractors	How do we know subcontractors are competent and following agreed controls?	
Worker voice	Ask workers: What is the biggest safety issue on this site? What happens when you raise a concern?	
Corrective actions	Select one recent action. Was it completed? Was effectiveness checked?	
Worker health	What current health exposures need active control or monitoring?	
Emergency readiness	Ask a worker what they would do in a foreseeable site emergency. Does the answer match the plan?	

EVIDENCE TO KEEP

Record who attended, WHS discussions with site management and workers, observations, actions and follow-up.

Build your evidence chain

For each requirement, connect the documented process to a real implementation record. The strongest evidence is traceable from expectation, to action, to review and follow-up.

01 EXPECTATION	02 IMPLEMENTATION	03 EVIDENCE	04 REVIEW
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Accreditation evidence map

REQUIREMENT	DOCUMENTED PROCESS	IMPLEMENTATION TEST	POSSIBLE EVIDENCE
Senior management roles defined	WHSMS / governance procedure	Named senior management roles and responsibilities	Current responsibility matrix; position descriptions; governance procedure
Senior management HIRAC participation	HIRAC procedure	Recorded participation in defined risk processes	Risk workshop record; risk register approval; meeting minutes
WHS objectives and targets	WHS planning / reporting process	Objectives measured at builder and project level	Objectives register; project WHS plan; performance report
Senior management performance review	Reporting / management review process	Review occurs and decisions are made	Minutes; dashboard review; actions; evidence of escalation
Communication to site management	Reporting / communication process	Relevant decisions reach projects	Project meeting minutes; action communication; briefings
Role-relevant training	Training procedure / matrix	Required leaders trained in duties, due diligence and WHSMS	Training content; attendance; competency/understanding checks where used
Senior manager site visits	Site assurance / leadership procedure	Visits occur at nominated frequency and include WHS discussion	Schedule; completed visit records; worker discussion notes; actions
Action follow-through	Corrective action process	Issues are owned, tracked, closed and significant actions verified	Action register; close-out evidence; effectiveness check
Jurisdiction interface	Legal obligations / project compliance process	Project requirements reflect the WHS/OHS jurisdiction and additional OFSC requirements	Jurisdiction register; project legal checklist; local regulator guidance; updates to WHSMS/project controls where needed

Auditor lens: questions to be ready for

The goal is not scripted answers. Leaders should be able to explain how the system works in their own business and point to recent evidence.

WHO	PRACTICE QUESTION
Senior leader	Which WHS risk decisions require your involvement? Show me a recent example.
Senior leader	What WHS objectives are you currently monitoring, and what have you done where performance is below target?
Senior leader	When did you last visit an active site? What WHS issue did you discuss directly with workers?
Senior leader	How do you know project teams are implementing the WHSMS rather than simply completing paperwork?
Project manager	What WHS information do you report to senior management, and what decisions or feedback come back?
Site manager / supervisor	What has senior management asked you to improve recently? How was it followed up?
Worker	Have senior managers spoken with you about safety? What happens when workers raise an issue?
Senior leader / Project manager	How do you make sure the OFSC WHSMS is implemented consistently while also meeting the WHS/OHS requirements that apply in each project jurisdiction? Show me a recent example.

Common gaps to look for

- ▶ The business has not clearly defined which roles count as senior management for the WHSMS.
- ▶ Senior management receives WHS reports, but the reports do not measure performance against defined objectives and targets.
- ▶ Reports are reviewed, but decisions and communication back to project teams are not recorded.
- ▶ Training records exist, but training is generic and does not cover role-specific WHS obligations, due diligence and the builder WHSMS.
- ▶ Site visits occur, but they are commercial/program visits with no recorded WHS discussion with workers.
- ▶ Project or construction managers visit sites, but relevant senior managers above the project level are not included.
- ▶ Actions are closed administratively without checking whether the risk was actually reduced.

Your 30 / 60 / 90-day action plan

Choose only the highest-value gaps. The purpose is to create a credible evidence trail quickly, not to generate unnecessary documents.

WHEN	PRIORITY ACTION	OWNER	DUE	EVIDENCE OF COMPLETION
0-30 days				
31-60 days				
61-90 days				

TIP

Prioritise actions that improve both implementation and the evidence trail. A new document is not automatically the best solution if an existing process can be strengthened and consistently recorded.

Suggested sequence if you are starting from a low score

Build the leadership system in a logical order, then test whether the evidence chain holds together.

FIRST	Define senior management roles and the leadership activities required by your WHSMS.
SECOND	Establish a simple WHS reporting and management review rhythm with aligned objectives and targets.
THIRD	Confirm role-specific training requirements and close priority training gaps.
FOURTH	Schedule senior manager site visits and use the site visit tool to create implementation evidence.
FIFTH	Review the first 60 to 90 days of records and fix any gaps in consistency, communication or follow-through.

READINESS TEST

At the end of 90 days, select one active project and trace each leadership requirement from the WHSMS to a recent implementation record. If the evidence chain breaks, that is your next improvement priority.

How to use this workbook with the WHS Readiness Diagnostic

DIAGNOSTIC RESULT	USE THIS WORKBOOK TO...
None at All	Use the workbook to establish the minimum leadership system and start building evidence.
Getting Started	Focus on consistency, role clarity and keeping usable implementation records.
Building the Foundations	Test whether leadership activity is embedded across projects and managers.
Strengthening Implementation	Use the auditor lens, evidence map and assurance questions to improve effectiveness.

Reference points and use notes

Keep the resource proportionate, use existing records wherever possible and confirm current requirements before relying on this workbook.

Primary OFSC reference

[Office of the Federal Safety Commissioner](#), WHS Accreditation Scheme Audit Criteria: [Residential Builders' Guide](#). Relevant leadership criteria are FP1.1 to FP1.4. The Guide emphasises both documented process and evidence of effective implementation.

Housing Australia context

The OFSC provides specific guidance for residential and head contractor builders tendering for Housing Australia funding under the Housing Australia Future Fund Facility (HAFFF) and National Housing Accord Facility (NHAF). Depending on the project and applicable exemptions, the Scheme may require the head contractor builder to be accredited before Housing Australia can fund the building work.

KEEP IT PROPORTIONATE

The objective is not to duplicate the State/Territory compliance system or create a second set of safety paperwork. Use existing WHS records wherever they already demonstrate the required activity, then add only the governance, assurance, reporting or audit evidence needed to close an OFSC readiness gap. For SMEs, keep responsibilities clear, tools short and records easy to maintain within normal project delivery. Proportionate does not mean informal: the evidence still needs to be consistent, traceable and usable at audit.

Useful official sources

- ▶ Residential builders undertaking Housing Australia projects - www.fsc.gov.au/residential-builders-undertaking-housing-australia-projects
- ▶ Scheme criteria guidance explained for head contractor builders - www.fsc.gov.au/scheme-criteria-guidance-explained-head-contractor-builders
- ▶ What is the accreditation process? - www.fsc.gov.au/what-accreditation-process
- ▶ Does the Scheme apply to me and my project? - www.fsc.gov.au/does-scheme-apply-me-and-my-project

DISCLAIMER

Readiness resource only. Confirm current OFSC criteria and the WHS/OHS requirements applying in each project jurisdiction.