Consultation & Subcontractor Management

Accreditation Readiness Workbook | September 2026

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

How to use this workbook

Understand what good consultation and subcontractor management look like, test your readiness and build a stronger evidence trail.

PURPOSE

Use this workbook to strengthen worker consultation and subcontractor WHS management, identify gaps, improve project evidence and prepare teams for audit conversations.

What you should get from it

- Consultation arrangements agreed with workers and used throughout the project.
- A clear WHS issue-resolution process that workers understand.
- Subcontractor WHS built into procurement, mobilisation and SWMS review.
- Joint inspections and field checks that verify agreed controls.
- Evidence that issues and actions are recorded and followed through.

A simple way to work through the resource

01	02	03	04	05
UNDERSTAND	**CHECK**	**STRENGTHEN**	**EVIDENCE**	**PREPARE**
Know what accreditation-ready consultation and subcontractor management look like.	Test your current systems and evidence.	Use the practical tools to close priority gaps.	Build a traceable record of implementation.	Practise the conversations people may need to have at audit.

IMPORTANT

OFSC accreditation does not replace State or Territory WHS/OHS legislation. Applicable consultation, contractor-management and high-risk work requirements continue to apply. This workbook focuses on additional OFSC consultation and subcontractor-management evidence a builder may need to demonstrate. It is a readiness resource and does not guarantee accreditation or legal compliance.

DISCLAIMER

Readiness resource only. Confirm current OFSC criteria and the WHS/OHS requirements applying in each project jurisdiction, including consultation, high-risk work and subcontractor obligations.

01

Why consultation and subcontractor management matter

For OFSC accreditation, consultation is not demonstrated by toolbox talks alone and subcontractor management is not demonstrated by prequalification alone. The builder needs evidence that arrangements are agreed, workers participate and subcontractor WHS is managed through the full project lifecycle.

The Residential Builders Guide tests whether consultation arrangements are agreed and implemented, workers are involved in relevant safety procedures, and subcontractor WHS is managed from procurement and mobilisation through Safety Work Method Statement (SWMS) review, joint inspection, field verification and follow-up.

ACCREDITATION LENS

The audit process looks beyond registers, induction signatures and subcontractor files. It tests whether consultation arrangements are agreed and used, subcontractors are managed through the project lifecycle, workers participate in relevant safety processes, and subcontractor controls are verified for the work actually undertaken.

What this means in practice

AGREED	Consultation arrangements are established with workers, not simply imposed, and the agreement is recorded.
PARTICIPATIVE	Workers and subcontractors contribute to Work Health and Safety (WHS) discussions, relevant procedures and selected inspections.
CONTROLLED	Subcontractor WHS requirements are built into procurement, mobilisation, Safe Work Method Statement (SWMS) review and field verification.
VERIFIED	Subcontractor capability and critical work controls are checked before work and periodically in the field.
RECORDED	Minutes, agreements, procurement reviews, SWMS checks, inspection participation and actions show the processes occurred.

Where this category maps to the OFSC guide

- FP3.1-FP3.3 - whole-of-project consultation, WHS issue resolution and worker involvement in developing site safety procedures.
- FP4.1-FP4.6 - subcontractor information, HIRAC in procurement, SWMS review, common site induction, joint inspections and verification of work against SWMS.
- Use Book 5 for training, competency and WHS performance evidence so these requirements are not duplicated here.
- Use existing Risk Management and Leadership records where they already demonstrate HIRAC participation, SWMS controls or management oversight.

02

What good looks like

Compare your current practice with stronger accreditation-ready practice. The aim is to make consultation and subcontractor controls deliberate, visible and auditable.

AREA	WEAK / INFORMAL PRACTICE	STRONGER ACCREDITATION-READY PRACTICE
Consultation	Toolbox talks occur, but arrangements are informal.	Workers agree consultation arrangements; regular forums, records and issue resolution are visible.
Worker involvement	Procedures are written without affected workers.	Affected workers or representatives contribute to relevant SWMS, Job Hazard Analysis (JHA), Safe Operating Procedure (SOP) and site-procedure review.
Subcontractor selection	Preferred supplier status or price drives selection.	Hazard Identification, Risk assessment & Control (HIRAC), work-package risk and current WHS capability form part of procurement and selection.
Mobilisation & SWMS	Documents and signatures are collected.	Project information is issued, SWMS are reviewed against builder criteria and site requirements are confirmed before work.
Joint inspections	The builder inspects subcontractors.	Subcontractors participate with the builder in selected whole-of-project WHS inspections.
Field verification	Controls are assumed to be in place once paperwork is accepted.	Actual work is periodically observed against the reviewed SWMS and agreed controls, with actions followed through.

04

Your four readiness levels

Use the level that best describes the consistency and evidence behind your current consultation and subcontractor management system.

1	**NONE AT ALL | Establish** **What it means: No consistent consultation or subcontractor WHS management process is evident.** **Your focus: Define minimum arrangements, responsibilities, procurement, mobilisation, SWMS and evidence expectations.**
2	**GETTING STARTED | Implement** **What it means: Some arrangements exist, but they may be informal, person-dependent or inconsistently recorded.** **Your focus: Make processes repeatable, communicate them and retain usable project evidence.**
3	**BUILDING THE FOUNDATIONS | Embed** **What it means: Core systems are established, but consistency across projects and subcontractors needs strengthening.** **Your focus: Standardise, monitor and verify consultation and subcontractor controls across live work.**
4	**STRENGTHENING IMPLEMENTATION | Assure and improve** **What it means: Systems are operating and evidence is available. The focus is on quality, effectiveness and continuous improvement.** **Your focus: Analyse themes, verify field effectiveness and use consultation and subcontractor performance to improve the WHSMS.**

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.

Consultation & Subcontractor Management Readiness Check

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

#	READINESS QUESTION	Y / P / N	POSSIBLE EVIDENCE
1	Are project consultation arrangements agreed with workers and recorded?	Yes [ ] Partly [ ] No [ ]	Consultation agreement; project WHS plan; prestart/toolbox record
2	Are regular consultation forums defined and are relevant outcomes available to workers?	Yes [ ] Partly [ ] No [ ]	Meeting schedule; minutes; communication records
3	Is there a WHS issue-resolution process that workers understand and can access?	Yes [ ] Partly [ ] No [ ]	Issue-resolution procedure; induction/toolbox evidence; issue records
4	Are workers or Health & Safety Representative (HSRs) involved in developing/reviewing site safety procedures relevant to their work?	Yes [ ] Partly [ ] No [ ]	SWMS/Job Hazard Analysis JHA/SOP consultation records; worker comments/sign-off
5	Is relevant project WHS and risk information provided to subcontractors before work starts?	Yes [ ] Partly [ ] No [ ]	Prestart package; scope briefing; WHS plan/risk information
6	Is HIRAC applied in subcontractor selection/procurement for the actual work package?	Yes [ ] Partly [ ] No [ ]	Tender/prequalification criteria; risk review; selection record
7	Are required SWMS identified and reviewed against builder-defined criteria before high-risk construction work begins?	Yes [ ] Partly [ ] No [ ]	SWMS register; review checklist; review/approval record
8	Is there a common site induction process for subcontractors and workers, with relevant visitor arrangements?	Yes [ ] Partly [ ] No [ ]	Induction content; attendance/acknowledgement; visitor process
9	Are subcontractor mobilisation checks completed before work starts?	Yes [ ] Partly [ ] No [ ]	Mobilisation checklist; insurances; licences/capability evidence where relevant
10	Do subcontractors participate with the builder in selected WHS inspections?	Yes [ ] Partly [ ] No [ ]	Joint inspection records; attendee details; actions
11	Is work periodically verified against the applicable SWMS and recorded?	Yes [ ] Partly [ ] No [ ]	SWMS observation/task verification; inspection records

12	Are subcontractor non-conformances assigned, tracked and closed?	Yes [ ] Partly [ ] No [ ]	Action register; non-conformance record; close-out evidence
13	Are repeat subcontractor WHS issues escalated into performance review or future procurement decisions?	Yes [ ] Partly [ ] No [ ]	Performance review; supplier review; management minutes
14	Are changes in scope, sequencing, design or site conditions communicated and reflected in subcontractor controls?	Yes [ ] Partly [ ] No [ ]	Change briefing; revised SWMS; risk review; toolbox record
15	Can one work package be traced from procurement through consultation, SWMS, mobilisation, field verification and close-out?	Yes [ ] Partly [ ] No [ ]	Linked procurement, mobilisation, SWMS, inspection and action records

USE THE EVIDENCE TEST

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

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Tool 1: Roles & accountability

Use this matrix to make consultation, subcontractor WHS and subcontractor management responsibilities explicit. Adapt role titles to your structure and keep responsibilities proportionate.

ROLE	WHAT THEY ARE ACCOUNTABLE FOR	EVIDENCE TO RETAIN
Director / CEO / Managing Director	Set expectations and resources; review material subcontractor performance and systemic issues.	Management review; decisions; escalations; action follow-up.
Construction / Operations Manager	Set project expectations; approve key subcontractor arrangements; review performance and capability across projects.	Project reviews; procurement decisions; performance reports; assurance visits.
WHS Manager / Adviser	Maintain consultation and subcontractor-management processes; support SWMS criteria and assurance.	Procedures; SWMS criteria; audit/inspection records; trend reports.
Project Manager	Establish consultation arrangements; coordinate subcontractor procurement/mobilisation; ensure SWMS and project requirements are met.	Project plan; meeting records; subcontractor reviews; mobilisation evidence.
Site Manager / Supervisor	Consult workers; induct people; verify SWMS implementation; involve subcontractors in inspections; stop/escalate unsafe work.	Prestarts; inductions; joint inspections; SWMS observations; actions.
Workers / Subcontractors	Participate in consultation and procedures; follow controls; raise issues and contribute to inspections and reviews.	Acknowledgements; toolbox records; inspection participation; feedback; close-out evidence.

MINIMUM DECISIONS TO DEFINE

Define how workers agree consultation arrangements; how issues are escalated; which subcontractor WHS criteria apply at procurement and mobilisation; who reviews SWMS; how joint inspections occur; how field verification is recorded; and how recurring subcontractor performance issues affect future work.

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Tool 2: Consultation & subcontractor WHS review

Use this review to test whether consultation, procurement, SWMS, induction, inspections and subcontractor field checks are working together rather than as separate administrative processes.

AGENDA ITEM	QUESTIONS TO ASK	DECISION / ACTION
Consultation arrangements	Are arrangements agreed, active and suitable for the current workforce and project stage?	Owner: ________ Due: ________ Evidence: ________
WHS issues	What issues have workers raised? How were they resolved and fed back?	Owner: ________ Due: ________ Evidence: ________
Worker involvement	Are workers involved in procedures/SWMS relevant to their actual work?	Owner: ________ Due: ________ Evidence: ________
Subcontractor procurement	Are WHS risk and current capability influencing work-package selection and engagement?	Owner: ________ Due: ________ Evidence: ________
Mobilisation	Have project information, inductions, permits/interfaces and required submissions been completed before work?	Owner: ________ Due: ________ Evidence: ________
SWMS review	Are required SWMS current, project-specific and reviewed against builder criteria before work?	Owner: ________ Due: ________ Evidence: ________
Joint inspections	Are subcontractors participating in selected whole-of-project WHS inspections?	Owner: ________ Due: ________ Evidence: ________
Field verification	Does work being performed match the SWMS and agreed controls?	Owner: ________ Due: ________ Evidence: ________
Non-conformance close-out	Are significant issues assigned, closed and checked for effectiveness?	Owner: ________ Due: ________ Evidence: ________
Trends & supplier performance	What recurring issues need management intervention or future procurement action?	Owner: ________ Due: ________ Evidence: ________

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Tool 3: Project participation & subcontractor verification

Use this site-based check to verify worker participation, subcontractor controls and subcontractor capability evidence against actual work being undertaken.

Project		**Reviewer**	
Date		**Site contact**	

Ask, observe and verify

FOCUS	PROMPT	NOTES / ACTION
Worker voice	Ask a worker: How are WHS issues raised and resolved on this site?	
Consultation	Show a recent consultation record and what changed or was decided as a result.	
Procedure involvement	Select a current SWMS/SOP. Were affected workers involved in its development or review?	
Subcontractor mobilisation	Select a subcontractor. Show the WHS information, procurement review and mobilisation checks completed.	
SWMS / work as done	Observe one high-risk activity. Does actual work match the reviewed SWMS and controls?	
Joint inspection	Show a recent inspection where a subcontractor participated with the builder beyond its own immediate work area.	
Change	How are changed conditions, sequencing or scope communicated and reflected in controls?	
Follow-through	Select one issue or non-conformance. Was it assigned, closed and, where significant, checked for effectiveness?	

EVIDENCE TO KEEP

Record who participated, worker/subcontractor discussions, procurement and mobilisation evidence reviewed, SWMS observations, issues, actions and follow-up.

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Build your evidence chain

For each requirement, connect the documented process to a recent implementation record. Strong evidence is traceable from expectation, participation or verification, to action and follow-up.

01	02	03	04
EXPECTATION	IMPLEMENTATION	EVIDENCE	REVIEW

Accreditation evidence map

REQUIREMENT	DOCUMENTED PROCESS	IMPLEMENTATION TEST	POSSIBLE EVIDENCE
Consultation arrangements	Consultation procedure / project plan	Workers agree how consultation will occur	Agreement record; meeting schedule; minutes; communication
Issue resolution	Issue-resolution process	Workers know and use the process; issues are resolved/escalated	Induction/toolbox evidence; issue record; resolution/feedback
Worker involvement	Procedure/SWMS development process	Affected workers/representatives participate	Consultation evidence; SWMS/JHA/SOP review record
Subcontractor information & selection	Procurement / mobilisation process	Relevant WHS information issued; HIRAC and capability applied to selection	Tender/prequalification record; risk review; mobilisation pack
SWMS review & implementation	SWMS review/verification process	Required SWMS reviewed before work and checked in field	SWMS register; review checklist; task observation
Common site induction	Induction process	Workers receive consistent site information and acknowledge instruction	Induction material; attendance/acknowledgement; visitor record
Joint inspections	Inspection process	Subcontractors participate in selected whole-of-project inspections	Inspection record; participants; actions
Performance / non-conformance	Subcontractor performance and corrective-action process	Issues are tracked, repeat themes escalated and significant actions verified	Action register; close-out; performance review; procurement decision
Change management	Project risk/change process	Subcontractor controls are reviewed when scope, design, sequence or site conditions change	Risk review; revised SWMS; toolbox/prestart; change record

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Auditor lens: questions to be ready for

The goal is not scripted answers. Workers, supervisors, project managers and subcontractors should be able to explain how consultation and subcontractor controls checks operate and point to recent evidence.

WHO	PRACTICE QUESTION
Senior leader	How do you know subcontractor WHS performance is being managed consistently across projects?
Project manager	Show how consultation arrangements were agreed on this project and how a recent issue was resolved.
Project / commercial	Show how WHS risk and capability influenced selection of a current subcontractor.
Site manager	Select a current subcontractor. Show mobilisation, induction and SWMS review before work started.
Worker / subcontractor	How do you raise a WHS concern here and what happens after you raise it?
Supervisor	Show one activity where actual work was checked against the SWMS and what happened with any gap.
Subcontractor representative	When have you participated with the builder in a broader project WHS inspection or review?
Senior leader / WHS	What recurring subcontractor issues have caused a change to procurement, controls or project management?

Common gaps to look for

- Consultation forums exist, but there is no evidence workers agreed to the consultation arrangements.
- The issue-resolution procedure is displayed, but workers cannot explain how to raise or escalate a WHS issue.
- SWMS are collected, but they are not reviewed against builder criteria before high-risk work starts.
- Subcontractors are prequalified, but HIRAC and current WHS capability are not considered for the actual work package.
- Subcontractors are inspected, but do not participate with the builder in broader project WHS inspections.
- Subcontractor records exist, but there is no defined process linking work-package WHS capability, mobilisation, SWMS review and field verification.
- Workers and subcontractors sign or acknowledge documents, but there is little evidence they were consulted, understood the controls or contributed to improvement.

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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 participation and field implementation as well as the evidence trail. Strengthen existing procurement, mobilisation, SWMS, induction and inspection records before creating new accreditation-only forms.

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Suggested sequence if you are starting from a low score

Build the consultation and subcontractor system in a logical order, then test whether the evidence chain holds together on a live project.

FIRST	Define consultation arrangements, issue resolution and subcontractor WHS responsibilities.
SECOND	Build HIRAC and work-package WHS criteria into procurement, selection and mobilisation.
THIRD	Standardise SWMS review, common site induction and project information before work starts.
FOURTH	Run worker consultation and joint subcontractor inspections; verify selected work against SWMS in the field.
FIFTH	Review 60 to 90 days of records and fix gaps in participation, close-out, change management or recurring subcontractor performance.

READINESS TEST

At the end of 90 days, select one active work package and trace it from procurement through consultation, mobilisation, SWMS review, induction, field verification and action close-out. 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	Establish minimum consultation and subcontractor-management processes and start building evidence.
Getting Started	Focus on worker agreement, issue resolution, consistent procurement/mobilisation and usable field records.
Building the Foundations	Test whether participation, SWMS verification and subcontractor controls are embedded across projects.
Strengthening Implementation	Use performance trends, auditor questions and field verification to improve effectiveness.

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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 criteria are FP3.1 to FP3.3 and FP4.1 to FP4.6. 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 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

Do not create separate OFSC-only consultation or subcontractor systems if existing project processes already demonstrate the required activity. Improve their clarity, participation and traceability. For SMEs, keep tools short and responsibilities explicit, but retain enough evidence to show what happened in practice.

Primary OFSC reference

- Scheme criteria guidance explained for head contractor builders - www.fsc.gov.au/scheme-criteria-guidance-explained-head-contractor-builders
- 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.