



INSPECTOR REPORT

COMCARE REFERENCE NUMBER	MC00041529
PCBU DETAILS	Name: Australian National University ABN: 520234 063 906 ACN:
REPORT ISSUED TO	Name: Pru May Position: Senior WHS Manager Cc:
BACKGROUND	
1. On 14 January 2026 a proactive work health and safety inspection was commenced with the Australian National University (ANU) as part of <i>Regional Engagement Program 2025-26 – Risk Management Program</i>. 2. The purpose of the inspection was to monitor compliance with the <i>Work Health and Safety Act 2011</i> (Cth) (WHS Act) and the <i>Work Health and Safety Regulations 2011</i> (Cth) (WHS Regulations). 3. The scope of the inspection was to examine whether persons conducting a business or undertaking (PCBU) has implemented a system for <i>Risk Management</i> that allows it to achieve legislative compliance and ensure that the PCBU's stated requirements are in use and systematically reviewed to ensure they deliver the PCBU's intended WHS outcomes.	
OUTCOMES	
4. Based on the information reviewed during the inspection, I did not identify any non-compliance with the WHS Act/WHS Regulations with respect to the scope of the inspection. Information and advice 5. The PCBU must ensure risks to health and safety are eliminated so far as is reasonably practicable, or if not reasonably practicable to do so, are minimised so far as reasonably practicable: s 17 of the WHS Act. PCBUs should have regard to Part 3.1 of the WHS Regulations and the <i>Code of Practice: How to Manage Work Health and Safety Risks</i> when managing risks to health and safety. The PCBU must monitor and maintain control measures, particularly any interim controls, to ensure that they remain in use and effective. 6. Comcare draws the ANU's attention to their duties to consult, so far as is reasonably practicable, with workers and HSRs on work health and safety matters. Comcare	



encourages PCBUs to share inspector reports, or to provide access to relevant content or information regarding hazards and associated risks, with their workers, including HSRs. PCBU must, so far as is reasonably practicable, 'consult with workers who carry out work for the business or undertaking who are, or are likely to be, directly affected by a matter relating to work health and safety' (s47).

7. Compliance with this duty may be assisted by sharing health and safety information from inspector reports with relevant workers and/or their representatives. PCBU should also note that HSRs are empowered to receive information relevant to their work groups, and that as a function of their role, may request access to inspector reports, or relevant information within them. Comcare encourages PCBU to have regard to their consultation duties, and to their obligations to HSRs under the WHS Act when responding to such requests (see s49, 70(1)(a), 70(1)(c), 71 and 79(3)).

COMPLIANCE ASSESSMENT

8. Prior to the inspection, the ANU was requested to provide a copy of any policies and procedures related to WHS Risk Management, including but not limited to:
 - Policies and procedures to demonstrate these arrangements are in place:
 - WHSMS/HSMA including - WHS Policy, WHS Risk Management Framework, Incident Reporting procedure; change management procedure
 - Roles and responsibilities of workers to:
 - Identify WHS hazards
 - Assess risks
 - Implement controls measures
 - Monitor control measures for effectiveness
 - Evidence of WHS training and instruction relevant to the workplace
 - Evidence of consultation on a WHS risk with another PCBU
 - Last two WHS Committee meeting minutes where workers have participated in decision making in relation to managing WHS matters
 - Completed WHS Inspection Checklist
 - Two operational risk assessments
 - Current list of HSRs
9. On 18 March 2026, I attended the ANU's Chancery Building 10A in the conduct of the inspection. The site visit was conducted as an announced inspection.
10. I undertook actions to make relevant Health and Safety Representative/s aware of my attendance at the workplace and afford the opportunity to engage in the inspection process. I did engage with the relevant Health and Safety Representative.



11. Based on the documentation provided prior to the inspection and the information reviewed during the inspection, I did identify elements within the Comcare *Risk Management* checklist that could not be demonstrated. The ANU should consider:
- a. include a process for the management of shared or cross jurisdictional risk.
12. I did identify elements of the Comcare *Risk Management* checklist that could be demonstrated. The ANU has implemented the following in relation to *Risk Management*:
- a. identifying components of a risk management framework that sets out the organisational arrangements for implementing, monitoring, reviewing and continually improving risk management practices,
 - b. defining when the PCBU's risk management approach is to be used,
 - c. endorsement by the PCBU's accountable authority,
 - d. defining the PCBU's risk appetite/risk tolerance,
 - e. an outline of key accountabilities and responsibilities for managing and implementing the PCBU's risk management framework,
 - f. identifying when risk assessments should be carried out,
 - g. defining the process for the identification of hazards,
 - h. defining the process for the management or control of the identified risk/s,
 - i. outlining how the PCBU reviews the controls to ensure they remain effective,
 - j. outlining the PCBU's process to train workers in the risk management framework,
 - k. including key definitions, such as but not limited to:
 - i. reasonably practicable,
 - ii. hazard,
 - iii. risk,
 - iv. risk assessment,
 - v. risk appetite.
 - l. keeping records of the risk management process.

During the onsite review of the risk register, the ANU demonstrated that:

- m. the processes as outlined in their documentation are followed,
- n. documents how consultation on control measures has been decided, approved/endorsed,
- o. implemented a process to review control measures including:
 - i. triggers,
 - ii. timeframes,
 - iii. obligations,
 - iv. version control.

The examples provided of consultation with another PCBU demonstrated that:

- p. consultation has occurred with another PCBU on a WHS matter,



q. consideration of feedback the ANU received.

13. A review of the ANU's incident register demonstrated that they were effectively capturing:

- i. incidents and hazards are being reported and investigated,
- ii. root cause/s are being identified,
- iii. appropriate controls are being applied to mitigate the risk of reoccurrence,
- iv. There is a process in place to review control measures to ensure they remain effective.

Discussions with an HSR, a worker and a contractor demonstrate that:

- a. They were able to identify the policies and procedures for risk management,
- b. They were consulted on the controls to be implemented to mitigate identified risk/s,
- c. They have received hazard identification, risk assessment and control (HIRAC) training and instruction to enable them to:
 - v. identify hazards,
 - vi. assess risk/s,
 - vii. implement control measures,
 - viii. monitor control measures to ensure they remain effective.

14. It is important to understand that the outcomes of this engagement should not be considered a validation of the ANU policies and procedures or their effectiveness. The ANU should ensure that the requirements of the Code of Practice (CoP): How to manage work health and safety risks are met.

15. Based on this assessment I did not identify any non-compliance with the scope of the activity and the inspection is now closed.

REPORT ISSUED BY	Inspector	[REDACTED]
	Inspector ID number	[REDACTED]
	Email	[REDACTED]@comcare.gov.au
	Phone	[REDACTED]
	Date	31/03/2026
	Signature	[REDACTED]



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DISCLAIMER

This report contains information that may assist you to take steps regarding your obligations under the WHS Act. You must refer to the Commonwealth *Work Health and Safety Act 2011* (WHS Act) and the *Work Health and Safety Regulations 2011* (WHS Regulations) to understand your duties and obligations. Comcare's external website contains links to WHS legislation. Comcare does not accept liability for any errors or omissions or for any loss or damage suffered by you or any person which arises from your reliance on this report or for any breach by you of your obligations under the WHS Act. Where a Comcare inspector has inspected a particular workplace, it is not a representation by Comcare that the particular workplace is in any way free of hazards.

IF YOU DO NOT AGREE WITH A DECISION

If you disagree with the outcome of this inspection, you may seek an internal reconsideration of the inspector's decision. A request for a review should be sent to statutory.oversight@comcare.gov.au including any additional information or evidence you have to support your request. Comcare will review your request and advise of the outcome in writing within 20 business days.

If you would like to clarify any aspect of this report, you can contact the inspector directly.

Comcare has a range of publications and fact sheets to help explain your responsibilities and provide guidance to make your workplace safer. The Compliance and Enforcement Policy provides guidance as to how Comcare approaches regulation. To access these, visit our website.

PRIVACY STATEMENT

Your privacy is important to us. Comcare will only collect, use or disclose personal information in accordance with the Commonwealth *Privacy Act 1988* and if it is reasonably necessary for, or directly related to, one or more of our functions, powers and/or activities. These include functions and activities under the following Commonwealth legislation: *Safety, Rehabilitation and Compensation Act 1988*, the WHS Act, the *Seafarer's Rehabilitation and Compensation Act 1992*, and the *Asbestos related- Claims (Management of Commonwealth Liabilities) Act 2005*. If Comcare does not collect personal information from you, for the purposes of its legislated functions or related functions, we may not be able to respond appropriately.

Comcare is the Commonwealth agency authorised by the WHS Act to collect personal information relevant to the exercise of functions and powers under the WHS Act, WHS Regulations and the administration and evaluation of Comcare's WHS programmes. Any personal information collected in these forms will be used for those purposes.

In exercising our functions and powers, Comcare may disclose personal information, subject to confidentiality of information provisions under the WHS Act, to the following bodies and agencies, including but not limited to:

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- a court or tribunal
- state or territory work health and safety regulatory agencies
- personnel engaged by Comcare to conduct research related activities
- enforcement agencies or bodies
- state and territory Coroners
- Commonwealth, state or territory industry regulators
- any other person assisting Comcare in the performance of its functions or exercise of its powers, including contractors and consultants
- any other person where there is an obligation under law to do so (for example but not limited to, responding to the direction of a court to produce documentation).

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