



Australian Government

Comcare

ISO45001 Certification or alignment assurance program

Information sheet

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Introducing a new assurance program

The purpose of the *AS/NZS ISO 45001:2018 (ISO45001) certification or alignment assurance program* is to provide assurance to the Safety, Rehabilitation and Compensation Commission (SRCC) that self-insured licensees (licensees) have and maintain a robust prevention management system that meets the requirements of ISO45001.

ISO45001 provides a best practice framework for managing occupational health and safety risks and opportunities, to prevent work-related injury and ill health and provide safe and healthy workplaces.

Licensees must meet specific requirements set out in the program to either:

- > achieve ISO45001 certification, or
- > demonstrate alignment with its standards.

This document provides information to support licensees transitioning from the National Audit Tool (NAT) to ISO45001 as the standard for their prevention management system.

The SRCC's Licence Compliance and Performance Model (LCPM) will be updated in June 2026 to incorporate the requirements of the certification and alignment assurance program.

Quick comparison: National Audit Tool and ISO45001

ISO45001 is less prescriptive than the NAT, providing more flexibility for organisations in their approach to risk control and documentation.

Category	National Audit Tool	AS/NZS ISO 45001:2018
Approach	Prescriptive	Risk-based and flexible
Structure	108 detailed criteria grouped into 5 elements	40 clauses structured under Plan-Do-Check-Act (PDCA)
Documentation	Extensive documentation required (eg procedures, registers)	Flexible documentation based on organisational needs
Hazard control	Specific controls mandated for various hazard types	Organisation determines appropriate controls based on risk
Legal compliance	Direct alignment with Australian WHS laws	Requires compliance with applicable legal requirements, but less prescriptive
Worker participation	Requires consultation and representation mechanisms	Emphasises worker participation and leadership commitment
Organisational context	Not explicitly addressed	Requires analysis of internal/external context and stakeholder needs
Continuous improvement	Focused on maintaining compliance	Strong emphasis on continual improvement and integration with business strategy
Audit and certification	Used by regulators for WHS assurance audits	Can be certified by accredited bodies or used as a framework for assurance

Pathways for transitioning to ISO45001

A licensee may choose to either become certified to ISO45001 or demonstrate alignment to the standard.

ISO45001 certification

If a licensee chooses to become certified, it must arrange its own certification under ISO45001.

Certification to ISO45001 requires an organisation to undergo an initial certification audit against its full requirements, followed by annual surveillance audits to monitor ongoing compliance and system effectiveness. A recertification audit is then undertaken at the end of the three-year cycle (see table below).

The audits must be undertaken by a JASANZ accredited auditor.

JASANZ publishes a list of accredited auditors on its website at JASANZ Register at www.jasanz.org

Overview of ISO45001 certification audits

Audit type	Purpose	When it's conducted
Certification audit	Assess full compliance with ISO45001 to issue certification	Start of 3-year cycle (Year 0)
Surveillance audit	Monitor ongoing compliance and system effectiveness	Year 1 and Year 2
Recertification audit	Confirm system compliance for renewal	End of 3-year cycle (Year 3)

Demonstrating alignment with ISO45001

Licensees may choose to align to ISO45001 without achieving formal certification.

Alignment of a prevention management system with ISO45001 refers to the extent to which the licensees' policies, processes, governance arrangements and operational practices are consistent with the requirements and intent of ISO45001.

To demonstrate alignment, licensees must arrange yearly independent audits that assess whether the system has been designed, implemented and maintained in accordance with the standard. The audit must also meet the requirements outlined in *SRCC ISO45001 Audit Requirements*.

Steps to transition

Licensees that are not yet certified or aligned with ISO45001 must complete a gap analysis and implement a documented transition plan to ensure their prevention management system meets ISO45001 requirements within the specified transition period timeframe.

Licensees must provide ongoing assurance during the transition period that its prevention management system remains operational and effective. This assurance must demonstrate that worker health and safety outcomes are maintained while alignment to ISO45001 is being implemented.

Conduct a structured gap analysis

The licensee must undertake a comprehensive comparison of its existing NAT-based prevention management system against the requirements of ISO45001.

This analysis should identify:

- > areas of alignment
- > areas requiring modification or enhancement
- > duplication or unnecessary content carried over from the NAT
- > opportunities to simplify or integrate processes.

The gap analysis would form the evidence base for transition planning.

Develop a transition plan

Based on the gap analysis findings, the licensee must prepare a documented transition plan that sets out:

- > transition objectives (including whether seeking ISO45001 certification or alignment)
- > required system changes
- > responsibilities and accountabilities
- > timeframes and milestones
- > resourcing requirements
- > monitoring and review arrangements
- > schedule for first audit against the *SRCC ISO45001 Audit Requirements* to establish initial conformity with ISO45001 (undertaken, at the latest, in the first quarter after the transition period).

Comcare and SRCC monitoring of the transition

Comcare and the SRCC will oversee licensee progress throughout the transition period.

The licensee must provide quarterly updates on the implementation of its transition plan. Comcare will review these updates, monitor progress, and may request additional documents or meetings with licensee representatives as needed. Comcare will report progress to the SRCC.

The quarterly progress report must also include documented assurance that:

- > the existing prevention management system continues to operate effectively
- > risk controls remain implemented and monitored
- > the transition to ISO45001 has not resulted in any reduction of worker health and safety protections.

Transition readiness and requirements

Your organisation has been assigned to a tier that determines its transition period.

Allocation to a tier is based on your organisation's response to Comcare's October 2025 ISO45001 maturity survey, and reflects the level of understanding of ISO45001 and readiness to align with the standard.

Detailed information about the requirements for the transition of each tier is set out below.

[Tier 1 – requires support to transition](#)

[Tier 2 – ready to transition](#)

[Tier 3 – certified](#)

Tier 1 – requires support to transition

Tier 1 organisations need to undertake foundational work to either align or certify their prevention management system with the ISO45001 standard. They have not undertaken an ISO45001 gap analysis.

Transition period

2 years (extensions can be considered by exception by the SRCC).

Documentation and monitoring requirements

Comcare and the SRCC will monitor the transition period. Licensees must submit required documentation within specified timeframes.

Timeframe (from 1 July 2026)	Requirements
3 months	> Undertake a gap analysis > Provide the full gap analysis to Comcare/SRCC
6 months	> Develop a transition plan > Provide the full transition plan to Comcare/SRCC
24 months	> Implement the transition plan > Provide Comcare/SRCC with quarterly updates on the progress of the transition plan, including assurance that the licensee's prevention management system remains operational and effective. Comcare will review these updates, monitor progress, and may request additional documents or meetings with licensee representatives as needed. Comcare will report progress to the SRCC.

Audit requirements

Audits commence when the transition period has completed.

For certification audits, the licensee will be subject to the ISO45001 audit cycle (certification, surveillance and recertification audits) by a JASANZ accredited auditor. The audit scope will be as per JASANZ certification requirements.

For alignment audits, the audit scope must cover the relevant clauses and requirements of ISO45001 that apply to the licensee's prevention management system as outlined in *SRCC ISO45001 Audit Requirements* or as directed by the SRCC.

Full audit reports and corrective action plans, limited to the scope of the self-insured licensee (non-licensee information can be redacted) must be submitted to Comcare with the annual Licensee Compliance and Performance Improvement (LCPI) report.

Audit schedule

Timeframe		Requirements
Transition year 1	1 July 2026 – 30 June 2027	No longer subject to LCPM NAT prevention management system extensive or scheduled reviews, except for any audits scheduled, directed or underway as at 1 July 2026. These must be completed. This includes the associated corrective action plans. Transition plan activities will satisfy the LCPM system maintenance requirement for quarterly performance, and yearly LCPI reporting.
Transition year 2	1 July 2027 – 30 June 2028	No longer subject to LCPM NAT prevention management system extensive or scheduled reviews. Transition plan activities will satisfy the LCPM system maintenance requirement for quarterly performance, and yearly LCPI reporting.
Post transition	1 July 2028 – 30 September 2028	First audit to establish alignment with ISO45001 must occur in the first quarter after the transition period.
	1 July 2029 onwards (to be aligned with LCPI reporting date)	Yearly audit against the ISO45001 standard by an independent auditor against <i>SRCC ISO45001 Audit Requirements</i> . The <i>SRCC ISO45001 Audit Requirements</i> will be subject to yearly review and update by the SRCC to ensure consistency and currency.

Tier 2 – ready to transition

Tier 2 organisations have an understanding of ISO45001 requirements and have undertaken an ISO45001 gap analysis.

Transition period

15 months (extensions can be considered by exception by the SRCC).

Documentation and monitoring requirements

Timeframe (from 1 July 2026)	Requirements
3 months	> Develop a transition plan > Provide the full transition plan to Comcare/SRCC
15 months	> Implement the transition plan > Provide Comcare/SRCC with quarterly updates on the progress of the transition plan, including assurance that the licensee's prevention (WHS) management system remains operational and effective. Comcare will review these updates, monitor progress, and may request additional documents or meetings with licensee representatives as needed. Comcare will report progress to the SRCC.

Auditing requirements

Audits commence when the transition period has completed.

For certification audits, the licensee will be subject to ISO45001 audit cycle (certification, surveillance and recertification audits) by a JASANZ accredited auditor. The audit scope will be as per JASANZ certification requirements.

For alignment audits, the audit scope must cover the relevant clauses and requirements of ISO45001 that apply to the licensee's prevention management system as outlined in the *SRCC ISO45001 Audit Requirements* or as directed by the SRCC.

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Tier 3 – certified

Tier 3 organisations are already ISO45001 certified.

Transition period

No transition period.

Auditing requirements

Licensee is subject to ISO45001 audit cycle (certification, surveillance and recertification audits) by a JASANZ accredited auditor. The audit scope will be as per JASANZ certification requirements.

Certification certificate and associated audit reports and corrective action plans limited to the scope of the self-insured licensee (non-licensee information can be redacted) must be submitted to Comcare with the annual Licensee Compliance and Performance Improvement report.

Audit schedule – transition arrangements for current audit activity

Timeframe	Requirements
1 July 2026 – 30 June 2027	No longer subject to LCPM NAT prevention management system extensive or scheduled reviews, except for any audits scheduled, directed or underway as at 1 July 2026. These must be completed. This includes the associated corrective action plans.
From 1 July 2027	No longer subject to LCPM NAT prevention management system extensive or scheduled reviews.

Assessing licensee performance

The SRCC will assess a licensee's ISO45001 yearly audit (whether certification or alignment audits) and corrective action performance against the standards and measures set out in the LCPM, (in particular, the success factors for prevention audits and corrective actions outlined in *Attachment E – Performance Assessment Methodology* of the LCPM). The terminology in the LCPM will be updated to reflect the change from the NAT to ISO45001.

Poor performance or loss of certification

In the first instance, the SRCC will direct a licensee to include relevant ISO45001 clauses and/or specific sites into its yearly internal audit program and include the outcomes in its LCPI audit report submission.

If the Commission wasn't satisfied with the assurance provided by the licensee's internal audit, it could then direct Comcare to undertake a targeted review.

If a licensee loses ISO45001 certification or fails to maintain alignment with the standard, the SRCC will consider its regulatory response framework under the LCPM, which includes actions up to and including revocation of the self-insurance licence.