

HOW TO USE THE MASTER CODE OF PRACTICE

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Risk Management for the Primary Duty

This guide provides a practical approach for using the Master Code to ensure the safety of your Transport Activities. As a party in the Chain of Responsibility (CoR), the Primary Duty requires you to eliminate or minimise public risks so far as is reasonably practicable, but it can be difficult to understand how this works in practice.

The steps outlined in this guide explain how to use the information about hazards, activities and controls from the Master Code to improve safety. They expand on the recommendations provided in the section on “Safety Risk Management” (p12) in the Master Code.

This guide also shows how you can use the Master Code Filter to assist with completing the risk management process.

Most Transport Activities involve other parties, and the most effective way to assess risks and identify controls is to involve your business partners when you work through the following steps.

Thought starter – the following steps will create lists of hazards, activities and controls relevant to your business. Consider these three lists in isolation first, to promote broad scale thinking and investigation and to form a comprehensive view of potential risks. Don't be afraid to repeat the process, looking at things from different perspectives to help identify risks and the best ways to deal with them, allowing for continuous review and adjustments as new insights emerge.

Who is in the room – Who else should be involved in the risk assessment process? Using a committee or working group and taking input from key people in your business can produce a better outcome, rather than relying on an individual to have all the answers.

Go broad first – assessing “so far as is reasonably practicable” happens at the end of the process, not at the beginning. See “Meaning of reasonably practicable” (p9) in the Master Code for more information.

Using the Master Code to manage risks



STEP 1 Determine whether you or your business is a party in the CoR

Review the definitions of the ten CoR parties and see whether you or your business performs any of those roles in relation to a heavy vehicle. If so, then you have a Primary Duty, and executives have an Executive Duty.

The Primary Duty relates to everything your business does associated with the use of a heavy vehicle on a road, including business practices and making decisions.

Remember: Each CoR party has the same Primary Duty – to ensure the safety of its Transport Activities.

See “Who or What is a party in the CoR” (p5) in the Master Code for more information.

STEP 2 Understand the context of your business or operations

This is the who, what, when, where, why and how of your business. Understanding the context is important because hazards and risks can differ depending on the nature of your operations.

Consider:

- What does your business do and how does it do it?
- What is the operating environment?
- What is the location?
- What are the constraints?
- Does it operate heavy vehicles?
- Does it manufacture goods?
- Does it manage a warehouse?
- Is it involved in mining, public transport, or agriculture?
- Is it a local council with multiple functions?
- How many employees are there and what do they all do?
- How many sites are there and what happens at each of them?
- What is done by the full range of employees, at each site, at different times and in different ways?
- What do your clients or contractors or business partners do?

STEP 3 Identify your transport activities

Map out all the Transport Activities your business or organisation performs, i.e. anything done that is related to the use of a heavy vehicle on the road.

It may be helpful to think about your activities chronologically and consider the transport task from start to finish – what are the activities undertaken by you and your business partners?

The Master Code describes 45 activities. Use these as a starting point to think about the things your business does. The first ten activities are Foundation Activities which every CoR party should be doing. The list of activities is not exhaustive. Your business may perform other Transport Activities not listed in the Master Code.

Record the full list of Transport Activities your business performs or is involved in. Consider what activities are done by your business partners or other parties. Consider how other parties are involved in each activity.

(Your list should include the activities you identified which are not described in the Master Code.)

Use the Master Code filter – use the Activities tab in the Master Code Filter to click through the activity types and select those activities which your business is involved in.

Downloading the Excel template will produce a list of the controls associated with each activity you select from the Master Code.

STEP 4 Identify and review the list of hazards

The “Overview of Hazards and Risks” (p21) in the Master Code contains a list of hazards which may arise through the use of heavy vehicles.

Review this list of hazards and decide which ones could be relevant to your business.

Think about hazards which might be created by the other businesses you are working with.

Some hazards are less obvious than physical ones, such as moving machinery. They may arise from the way work is organised, scheduled, communicated, or performed. These behavioural, organisational or system-related factors are also hazards and must be identified as part of the risk management process.

Consider whether there are other hazards unique to your business not described in the Master Code. The heavy vehicle industry is diverse, and the Master Code cannot describe each possible hazard. Consider your specific operating environment to identify other hazards which may arise.

Review the Master Code Hazard and Activity Matrix.

The matrix identifies which activities in the Master Code may contain controls relevant to each hazard category. Use the matrix to see whether there are other hazards associated with your activities that you may not have considered.

Make a list of the hazards associated with your transport activities.

(Your list should include other hazards you identified which are not described in the Master Code)

Use the Master Code filter – use the Hazard tab in the Master Code Filter to click through the hazard categories and select specific hazards which are relevant to your business.

Downloading the Excel template will transfer the hazards you selected into a hazard log template, where potential outcomes of each hazard can be recorded, and the likelihood and consequence considered and assessed.

STEP 5 Consider the controls

For each activity you identify as being part of your business operations in Step 3, consider the relevant controls recommended by the Master Code.

Reviewing these controls may help to identify other hazards not previously recorded. If so, add these to your list of hazards.

For each recommended control, consider whether:

1. You already have that control, or something similar, in place.
2. You could readily implement a version of the control.
3. The control could be implemented with time, or with additional resources.
4. The control is not relevant to your operations.

Note: A control may not be relevant for several reasons – because it is unfeasible, would be ineffective, cannot be applied in practice or has no safety benefit. For example, a business that unloads commodities following its own procedures does not need to rely on an unloading plan; premises that do not receive livestock do not need to train employees in safe animal handling.

Include any other controls you have in place, that aren't described in the Code, but which are implemented by your business, or by your business partners.

Use the Master Code filter – use the table of controls for each activity produced in Step 3 and decide whether each control is already in place, could be implemented immediately, requires more time or resources, or is irrelevant in your operations.

Use the notes column to make a record of your decision-making process.

STEP 6 Assess the risks

For each hazard identified in Step 4 and Step 5 (if applicable), consider and document the causes and potential consequences.

The “Overview of Hazards and Risks” in the Master Code (p21) includes a list of potential consequences. Each of these potential consequences becomes a risk to be eliminated or minimised.

Assess the likelihood and severity of each of these risks and assign each a rating.

Use the Master Code filter – the hazard log produced by the Master Code Filter in Step 4 can assist with this assessment, and with assigning each risk a rating.

Use the drop-down lists in columns F (Existing Probability) and G (Existing Severity), to produce an Existing Risk Rating in column H.

Assigning a risk rating is a useful way to establish an order of priority, so that the most serious risks can be addressed first.

Assessing risks and assigning risk ratings is discussed in more detail in the “Safety Risk Management” (p12) and “Meaning of reasonably practicable” (p9) sections of the Master Code.

It will often be necessary for multiple CoR parties to work together on the risk assessment process, to understand what the actual likelihood and severity of the risk is. Without working together, each CoR party would be unable to undertake this process effectively.

STEP 7 Allocate controls to your risks

When allocating controls to your risks, you should always start with the most serious risk first. This is the risk which is assessed as having the highest severity and the highest likelihood.

You must implement a control or combination of controls that eliminate each risk, or where it is not possible to eliminate the risk then to minimise the risk, so far as is reasonably practicable. Understanding what is ‘reasonably practicable’ requires having a sufficient view of the risks within the transport activity. The broader and more accurate your understanding of the overall risk profile, the more effectively you can choose controls that address the underlying sources of risk.

If you are working with other businesses, it might not be until you discuss the activity with your business partners, and understand what each other is doing, that you can decide what controls will be “reasonably practicable” to ensure safety.

Each business will need to do different things, at different times, and in different ways to control the risk to the required standard. Decide which controls are relevant to each risk, noting some controls will be effective for multiple hazards and risks.

Remember, you do not have to implement all the controls in each activity in the Master Code, and you may use alternative equivalent controls.

1. Continue using controls you already have in place.
2. Start applying the controls you could implement immediately.
3. Decide how, and when, you can implement the controls you identified as requiring more resources.

For each risk you identified ask yourself:

- can I properly understand the seriousness of the risk?
- are the controls I can implement sufficient?
- is the system complete? What are the gaps? can I fill the gaps?
- what do I require of my business partners? what do they require of me?
- Is the risk eliminated or minimised so far as is reasonably practicable?

Use the Master Code filter – the controls you identified in Step 5 can be added to the Hazard Log template and allocated to the assessed risks from Step 6 as part of the overall risk management process.

The Hazard Log then allows for the risks to be reassessed, once controls have been added, to decide whether the risks have been eliminated or minimised so far as is reasonably practicable.

Note: The Master Code does not link individual controls to each hazard or risk. It describes activities during which different hazards may be created, and where opportunities will exist for controls to be implemented. Identifying appropriate controls is the responsibility of the CoR party, because it depends on the who, what, when, where, why and how of each business. The Hazard and Activity Matrix provides a guide to which activities in the Master Code contain controls which may be relevant to each hazard.

STEP 8 Engage with your business partners

Depending on the context of your business, engaging with your business partners may have been a feature of each step as you worked your way through this process.

If not, working together with your business partners creates the best opportunity to implement a system of controls for each risk. Understanding what controls each business has in place allows the parties to assess whether the risk has been eliminated or minimised so far as is reasonably practicable, or if further (or fewer) controls are required.

Understand what your business partners are doing, what they can do, and communicate what you need them to do.

Inform your business partners about what you are doing, get feedback about what other things they require from you.

If your business arrangements are transactional, or your opportunity to engage with your business partners is limited, you still need to implement controls for the risks you identified. One way to do this may be to produce a policy or standard about the risks you have identified and the controls you have in place which are reliable and repeatable. Publish this or provide it to your business partners or those you are transacting with.

See “Activity 7 – Working with Other Businesses” (p32) in the Master Code for more information.

STEP 9 Re-appraisal of hazards and controls

After allocating controls to your risks, there may be controls remaining unallocated, which don't appear to be relevant to the hazards or risks you identified initially. If the controls can be applied in your business, think about the hazards and risks they could relate to.

Are there further hazards which are now apparent to you, or could the controls contribute to managing a risk for one of your business partners?

Working backwards like this might help you identify a hazard that wasn't apparent at first.

Make changes to your list of hazards or activities, or to your Hazard Log, and repeat the steps of this process to capture any new hazards you identify.

STEP 10 Monitoring and assurance

For each control implemented to manage a hazard, decide what can be measured, monitored or recorded, and what information is required to ensure the controls are operating effectively and as intended.

This includes controls implemented by you, along with those of your business partners which you are relying on. Make arrangements for the required information to be exchanged.

See “Activity 8 – Monitoring and Assurance” (p33) in the Master Code for more information.

STEP 11 Review

Review your controls and how they are implemented if you identify they are not performing as intended.

Other events might also trigger a review, for example:

- concerns raised by employees
- a serious incident or near miss
- control failures
- audit results
- data showing increased risk based on operational outcomes
- changes to business operations e.g. new client, business expansion, new staff, new equipment, new processes
- emerging hazards and risks
- changes to the physical or regulatory environment.

Establish a periodic review cycle, so minor or incremental changes over time to controls, or in the operating environment, don't escape notice and create a substantially different risk environment.