



Training Accreditation Council
WESTERN AUSTRALIA

Strategic Industry Audit Report

Strategic Industry Audit
into Units of Competency that lead to
High Risk Work Licences in Western Australia

The Training Accreditation Council conducted a Strategic Industry Audit into 10 units of competency that lead to high risk licences in Western Australia. The outcome of the audits, including key findings and recommendations, are contained within this report.

This is version 1, ref: 2016/07866 of the Training Accreditation Council Strategic Industry Audit into Units of Competency that lead to High Risk Work Licences in Western Australia.

Contact the Training Accreditation Council:

P: (08) 9441 1900 (Monday to Friday, 8.30 am – 4.30 pm)

E: tac@des.wa.gov.au

W: www.tac.wa.gov.au

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ACRONYMS

AQF	Australian Qualifications Framework
AQTF	Australian Quality Training Framework
ASQA	Australian Skills Quality Authority
CISC	Council of Australian Governments Industry and Skills Council
DTWD	Department of Training and Workforce Development
HRW	High risk work
HRWL	High Risk Work Licence
NAI	National Assessment Instrument
RPL	Recognition of Prior Learning
RTO	Registered Training Organisation
SIA	Strategic Industry Audit
TAC	Training Accreditation Council (of Western Australia)
VET	Vocational Education and Training
WA	Western Australia

ACKNOWLEDGEMENT

The Training Accreditation Council (the Council) would like to thank and acknowledge the Reference Group members and technical advisors for their participation and technical expertise and advice provided throughout the duration of the strategic industry audit. The Council would also like to thank and acknowledge RTOs for their co-operation, assistance and participation in the strategic industry audit.

EXECUTIVE SUMMARY

The Training Accreditation Council (the Council) is Western Australia's registering and course accrediting body. The Council is an independent statutory body responsible for the quality assurance and recognition of vocational education and training (VET) services in WA.

During 2015 the quality of training linked to the issuance of high risk work licence (HRWL) training and assessment was identified as a concern by various stakeholders, including industry training councils, industry regulators, advisory groups and RTOs. Issues of central concern were:

- the amount of training allocated for training and assessment activities per learner was not sufficient to enable them to meet the requirements of the unit of competency;
- assessment practices, including assessment against the unit of competency, were not meeting requirements of the *Standards for Registered Training Organisations (RTOs) 2015* and legislative requirements underpinned by the *Occupational Safety and Health Regulations 1996*;
- vocational competencies of trainers and assessors; and
- marketing practices and use of third party arrangements.

In general, key stakeholders believed that existing HRWL training and assessment practices were not sufficiently robust to give industry confidence in training and assessment outcomes.

A Strategic Industry Audit (SIA) was initiated to confirm whether RTOs delivering this training and assessment in Western Australia (WA) were meeting the *Standards for RTOs*, provide comment on whether there were systemic issues impacting on the delivery of HRWL training and assessment services, and recommend strategies to address key issues to improve the quality of HRWL training and assessment.

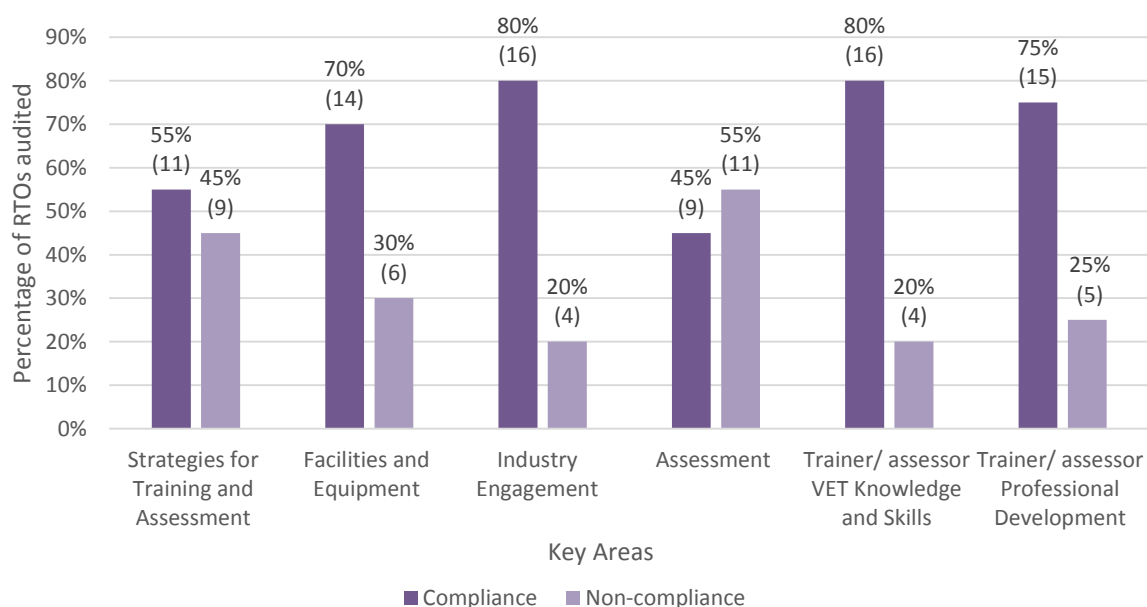
Audit findings of 20 RTOs were reviewed as part of the SIA, which comprised 12 RTOs specifically selected for the SIA and 8 RTOs previously audited as part of the Council's ongoing regulatory strategy. Student and stakeholder views were sought through targeted interviews and an online survey of employers of high risk work licence holders was commissioned to capture employer perspectives on HRWL training and assessment. Feedback from these stakeholders contributed to the findings of the SIA.

In industries where gaining a licence is dependent on the training and assessment outcomes, and the training has critical high risk safety implications, one RTO operating in non-compliance is not acceptable. The proportion of providers in this SIA with an overall level of non-compliance that was significant or critical (35%), and the proportion of providers with at least one non-compliance relating to assessment (55%) raises significant concern. Given the nature of the training provided in the context of high risk work and associated safety implications, the unease and concern expressed by industry stakeholders is justified.

Concerns about the safety of individuals is of the highest priority and the potential for serious consequences is heightened when evidence of non-compliant training and assessment practices are identified.

Figure 1 below provides a snapshot of the key areas of non-compliance identified through the audit process:

Figure 1: Overall compliance outcomes



Reference Group and Council members agree that more should be done to ensure the recipients of VET certification and licences issued on the strength of the issuance of VET certification have appropriately demonstrated competency to perform the prescribed skills.

The findings of the SIA has resulted in a number of recommendations aimed at:

- ensuring ongoing compliance of RTOs, including exploring options for VET Regulators to reduce timeframes to remove non-compliant RTOs from the sector; and
- providing information and advice to key stakeholders regarding the findings of the SIA, in particular related to practical experience and assessment components of the units of competency, including a communication strategy that explains the role of competency outcomes expected from HRWL training and job specific development of employee skills.

The impact, key findings and recommendations of the SIA are as follows:

Impact of audit

As a result of the SIA:

- one RTO that was found critically non-compliant at audit voluntarily relinquished its registration,
- one RTO removed the nominated units of competency following notification of their inclusion in the audit sample;
- one RTO remains in rectification, at the time of publication of this report; and
- all remaining RTO have demonstrated compliance with the standards following rectification and will continue to be monitored by the Council.

Key findings

Variability in compliance

- There were varying levels of compliance with the standards:
 - 70% of RTOs were non-compliant with one or more of the standards; and
 - 35% of non-compliant RTOs had overall levels of significant or critical non-compliance; and
 - 30% of RTOs were fully compliant with all standards audited
- All RTOs demonstrated compliance with the standards relating to:
 - provision of sufficient trainers and assessors to deliver the HRWL units;
 - employment of trainers and assessors with requisite vocational competencies; and
 - issuance of certification documentation only to learners who have been assessed as meeting the training product requirements.
- The areas of highest non-compliance are in relation to the assessment standards and meeting the training package specifications, which compromise assessment outcomes.
- There were varying levels of compliance between different HRWL units:
 - higher levels of non-compliance were found for Rigging Basic and Advanced, Scaffolding Intermediate and Advanced and Crane mobile slewing >3 tonne compared to the other licensing units.
- The variability in the levels of compliance with the standards results in inconsistency in the quality of HRWL training outcomes and confirms industry concern about the lack of consistency in competencies of employees who have undertaken HRWL training.

Assessment practices

- High levels of non-compliance with assessment standards were found, validating industry's concerns about the quality of assessment for HRWL units.
- Most of the non-compliances were due to insufficient evidence to confirm that the assessment requirements of the HRWL units, the principles of assessment and the rules of evidence had been met.
- Poor assessment practices have resulted in compromised assessment outcomes.

Timeframes for training and assessment

- The duration of training for HRWL units varied between 15 and 40 hours.
- 58% of the RTOs audited were unable to justify how the skills, knowledge and experience of individual learners have been taken into account in determining the duration of training.
- The inability by some RTOs to justify training duration may indicate insufficient learning opportunities to develop knowledge and skills and insufficient assessment time to ensure all unit requirements are able to be demonstrated.
- There is a direct relationship between delivery of courses in shorter timeframes and higher non-compliance with the standards.

Trainer and assessor knowledge and skills

- Almost all HRWL trainers and assessors held the TAE40110 Certificate IV in Training and Assessment, however there is evidence of a lack of ongoing professional development in VET knowledge and skills. This may be a contributing factor in the poor assessment practices.
- The majority of RTOs were compliant with the standards relating to the vocational competency and industry currency of HRWL trainers and assessors.

Employer expectations

- 40% of employers surveyed believe that there is too much emphasis on theory and not enough on practical experience in HRWL training.
- Employer expectations about the experience employees will gain from undertaking the HRWL training do not match the outcomes as specified in the HRWL units of competency.
- Employers are calling for more practical experience:
 - before learners are deemed competent in the HRWL units; and
 - in between progression from basic to intermediate to advanced levels of the licences.

The Council, Industry Training Councils and Industry Regulators will work collaboratively to implement the following recommendations of the SIA.

Recommendations

Ongoing compliance

- 1) The Council to undertake within 6 months monitoring audits of all RTOs continuing to deliver HRWL training that were found to have critical or significant levels of non-compliance. The audits to focus on non-compliances identified as part of the SIA findings and the implementation of rectification actions.
- 2) The Council to ensure that RTOs audited for units of competency that lead to HRWLs, including all new applications, be subject to a site audit, with technical advisors in attendance wherever possible. The outcome of the audits to be reviewed within 12 months to determine if monitoring is an ongoing requirement.
- 3) The Council, WorkSafe and Department of Mines and Petroleum to develop strategies for the capture and timely sharing of intelligence from industry. This information would be used to inform the Council's risk strategies.

Practical experience and assessment

- 4) The Council to forward the outcomes of the SIA to the Australian Industry and Skills Committee (AISC) and the relevant National Industry Reference Committees highlighting concerns surrounding the assessment requirements, including:
 - a. the need to thoroughly review arrangements where assessment instruments are prepared by external bodies, and
 - b. relaying industry's position that more practical training and assessment should be mandated in the units of competency.
- 5) The Council to raise with Safe Work Australia concerns identified during the SIA regarding the NAIs for consideration in the review and future development of the instruments.
- 6) The Council and WorkSafe collaborate to refine and expand materials for registered HRWL assessors including requirements for the use of the national NAIs and general assessment requirements in the *Standards for RTOs*.

Information and education

- 7) The Council to request that the relevant Western Australian Training Councils liaise with WorkSafe on the development of a communication strategy that explains to employers the competency outcomes to be expected from HRWL training including the basic threshold for HRW licensing and employer responsibility for site and job specific development of employee skills.

Regulatory reforms

- 8) The Council, together with other VET Regulators, explore options to reduce timeframes to remove non-compliant providers from the sector.

1 INTRODUCTION

1.1 Background

The Training Accreditation Council (the Council) is Western Australia's registering and course accrediting body. The Council is an independent statutory body responsible for the quality assurance and recognition of vocational education and training (VET) services in WA.

The Council implements a continuous audit strategy as part of its approach to regulation. This ensures a flexible audit approach that is able to respond to issues as they arise. The audit strategy complements the national approach to risk management and enables ongoing monitoring of compliance. The Council undertakes a range of audits, including strategic industry audits (SIA) of registered training organisations (RTOs), to ensure ongoing compliance with the *Standards for Registered Training Organisations (RTOs) 2015 (Standards for RTOs)*. The *Standards for RTOs* provide a national set of standards which assure nationally consistent, high-quality training and assessment services for the clients of Australia's vocational education and training system.

Specifically, SIAs are undertaken to confirm that RTOs delivering training and assessment services within a specific industry area are meeting the requirements of:

- the *Standards for RTOs*;
- the endorsed nationally recognised training products (qualifications and units of competency within Training Packages);
- industry and industry licensing authority areas; and
- VET and relevant industry based legislation, where applicable.

The outcomes of SIAs provide an overview of activity and quality of delivery and assessment for key stakeholders and other interested parties. Other issues of concern to industry may also be reported on, however the focus is on the qualifications and/or units of competency (training products) in the specific industry area.

To obtain a HRWL an individual is required to be trained by an RTO and assessed by a registered HRWL Assessor. Registered HRWL Assessors have an ongoing responsibility to comply with WorkSafe's legislative and administrative requirements relating to the assessment of applicants for a licence to perform high risk work¹.

During 2015 the quality of training linked to the issuance of high risk work licence (HRWL) training and assessment was identified as a serious concern by various stakeholders, including industry training councils, industry regulators, advisory groups and RTOs. Given the high risk nature and potentially life-threatening implications of the job roles to which the training relates, stakeholders expressed with

¹ A Guide to Becoming a registered HRWL Assessor for Licensing Persons Performing High Risk Work (WorkSafe, http://www.commerce.wa.gov.au/sites/default/files/atoms/files/application_guide_hrassessor.pdf, p5)

great urgency the need to review training and assessment practices as a matter of priority in the interest of public safety.

Concerns raised by stakeholders are categorised as follows:

- the amount of training allocated for training and assessment activities was not sufficient to enable individual learners to meet the requirements of the unit of competency;
- assessment practices, including assessment against the unit of competency and use of the mandated National Assessment Instruments (NAIs), were not meeting requirements of the *Standards for RTOs* and legislative requirements underpinned by the *Occupational Safety and Health Regulations 1996*;
- vocational competencies of trainers and assessors may not be sufficient to meet the requirements of the *Standards for RTOs*; and
- marketing practices and use of third party arrangements may not be adequate in meeting the requirements of the *Standards for RTOs*.

In general, key stakeholders believed that existing HRWL training and assessment practices were not sufficiently robust to give industry confidence in training and assessment outcomes.

Further, an analysis of the Council's complaints data for 2014 and early 2015 revealed that six verified complaints were lodged against RTOs delivering HRWL training – the only area of training for which repeated complaints were lodged. Four of the six complaints related to duration, quality of training and assessment, and marketing, adding weight to the concerns raised by stakeholders.

Based on the information provided by various stakeholders and Council data, a SIA was initiated to confirm whether RTOs delivering HRWL training and assessment in Western Australia (WA) were meeting the *Standards for RTOs*. This SIA provides stakeholders with a 'point in time' snapshot of training and assessment for units of competency that lead to the issuance of 10 HRWLs.

The objectives of the HRWL SIA were to:

- determine the overall level of compliance with the relevant standards (the *Standards for RTOs* or the Australian Qualifications Training Framework (AQTF)) of a sample of RTOs in WA delivering nationally recognised units of competency leading to HRWLs;
- identify and analyse key areas of RTO compliance and non-compliance with the standards;
- identify key issues impacting on training and assessment practices;
- provide comment on whether there are systemic issues impacting on the delivery of HRWL training and assessment services; and
- recommend strategies to improve the quality of HRWL training and assessment and enhance working relationships with other industry regulators.

1.2 Audit methodology and scope

1.2.1 Methodology

The audit methodology was based on the following key steps:

- scoping and risk assessment of units of competency/HRWLs;
- initial profiling of RTOs and determination of audit sample;
- establishment of a Reference Group;
- identification of technical advisors;
- site audits of RTOs;
- key stakeholder interviews;
- interviews of past students;
- employer survey;
- collation and analysis of data from audit outcomes; and
- identification of common themes or trends from interviews and surveys.

Student and stakeholder views were sought through targeted interviews, and an online survey of employers of high risk work licence holders was commissioned to capture employer perspectives on HRWL training and assessment and suggested areas for improvement.

Full details of the audit methodology are provided in **Appendix A**.

1.2.2 Reference group

VET programs are designed to deliver workplace specific skills and competencies and VET providers are required to engage with industry to deliver client-focused, flexible, relevant and responsive education and training to individuals².

Collaboration with industry is therefore an important feature of SIAs conducted by the Training Accreditation Council and as such, a Reference Group was established to support the SIA. Specifically, the role of the Reference Group for this SIA was to:

- provide input into the scope and audit approach;
- provide advice on industry issues and trends relating to high risk work licences;
- provide advice, direction and support for the SIA process;
- assist in identifying technical advisors to attend RTO audits and provide assistance to auditors;

² Commonwealth Department of Education and Training website - <https://www.education.gov.au/skills-and-training>

- provide input into the employer survey and facilitate its distribution through industry networks; and
- provide comment on, and endorse, the recommendations of the final report.

The Reference Group comprised representatives with a strong understanding of industry, licensing and regulatory requirements, as well as issues impacting on the industries that employ personnel with HRWLs.

Membership of the Reference Group is provided at **Appendix B**.

The SIA targeted 10 units of competency that lead to HRWLs in WA:

Table 1: Units targeted in SIA

UNIT OF COMPETENCY	HIGH RISK WORK LICENCE CLASS
CPCCLDG3001A Licence to perform dogging	DG
CPCCLRG3001A Licence to perform rigging basic level	RB
CPCCLRG3002A Licence to perform rigging intermediate level	RI
CPCCLRG4001A Licence to perform rigging advanced level	RA
CPCCLSF2001A Licence to erect, alter and dismantle scaffolding basic level	SB
CPCCLSF3001A Licence to erect, alter and dismantle scaffolding intermediate level	SI
CPCCLSF4001A Licence to erect, alter and dismantle scaffolding advanced level	SA
TLILIC2005A Licence to operate a boom-type elevating work platform (boom length 11 metres or more)	WP
TLILIC3006A Licence to operate a non-slewing mobile crane (greater than 3 tonnes capacity)	CN
TLILIC4011A Licence to operate a slewing mobile crane (over 100 tonnes)	CO

1.2.3 Additional areas of focus

Anecdotal evidence from industry stakeholders and RTOs suggested that a number of factors contributed to alleged poor practices in training and assessment services undertaken by RTOs. The feedback received resulted in the inclusion of additional areas of focus for this SIA to provide some context to the characteristics of the industry that may or may not impact on the quality of nationally recognised training and assessment services provided by RTOs.

Based on anecdotal evidence from industry stakeholders and RTOs, the additional areas of focus for the audit included:

- influencing factors, business pressures and drivers for HRWL RTOs;
- amount of training provided by RTOs for each HRWL;
- clustering of units of competency by RTOs (clustering means when RTOs combine two or more units of competency and this practice generally results in shorter timeframes);
- consecutive delivery of related units that increase in complexity (basic, intermediate, advanced) without workplace application of the skills before progressing to the next level; and
- requirements for practical on-site experience.

Student and stakeholder views were sought through targeted interviews, and an online survey of employers of high risk work licence holders was commissioned to capture employer perspectives on HRWL training and assessment and suggested areas for improvement.

1.2.4 RTO sample and training products

At the time of preparing the audit sample, 51 TAC-regulated RTOs had units of competency related to high risk work licences on their scope of registration. Six of these RTOs did not have the specific HRWL units selected for audit on scope. WorkSafe data identified a further six RTOs that were not currently issuing Notices of Assessment³, indicating that they were not delivering training or assessment for the ten selected units of competency. For the purpose of the SIA, the HRWL training market was therefore estimated to consist of 39 RTOs delivering one or more of the selected units of competency.

The following factors were considered in establishing the final audit sample:

- volume of delivery;
- geographic location;
- audit activity within the previous 12 months;
- complaint history;
- RTO's general audit history of compliance/non-compliance;
- selection of a large enough cross-section of RTOs delivering across the HRWL units identified in the audit sample; and
- any previously identified issues collected as part of information gathered from a number of sources, such as industry engagement activities.

³ WorkSafe registered HRWL assessors conduct vocational education and training assessments on behalf of WorkSafe that results in the issuing of a Notice of Assessment. This is the only document issued by the HRWL assessor, required for WorkSafe to issue a HRWL.

The audit sample of 20 RTOs comprised 12 RTOs specifically selected for the SIA and 8 RTOs previously audited as part of the Council's ongoing regulatory strategy. Audits were conducted between October 2014 and December 2015. This combined sample of 20 RTOs enabled the SIA findings to reflect the performance of:

- 51% of Council-registered RTOs delivering the selected units of competency; and
- 77% of Notices of Assessment submitted to WorkSafe by Council-registered RTOs.

Five RTOs registered with the national VET Regulator, the Australian Skills Quality Authority (ASQA) were included in the data sample and ASQA was invited to participate in the audits. At the time of compiling the final report, ASQA audits had not yet been undertaken, and therefore data from these five RTOs could not be included.

1.3 The High Risk Work Licence training landscape

1.3.1 Overview

High risk work occurs to varying degrees in a range of industries in WA and RTOs in the audit sample reported that they served one or more of the following industry sectors:

- Building and Construction;
- Mining and Resources;
- Power;
- Transport;
- Oil and Gas;
- Warehousing;
- Arborists;
- Painters;
- Fire Services and Systems;
- Fishing; and
- General Industry.

All of the RTOs in the audit sample provided training to the building and construction industry and all but one also served the mining industry. All RTOs served two or more industries, with one RTO providing HRWL training to six of the industry sectors listed above.

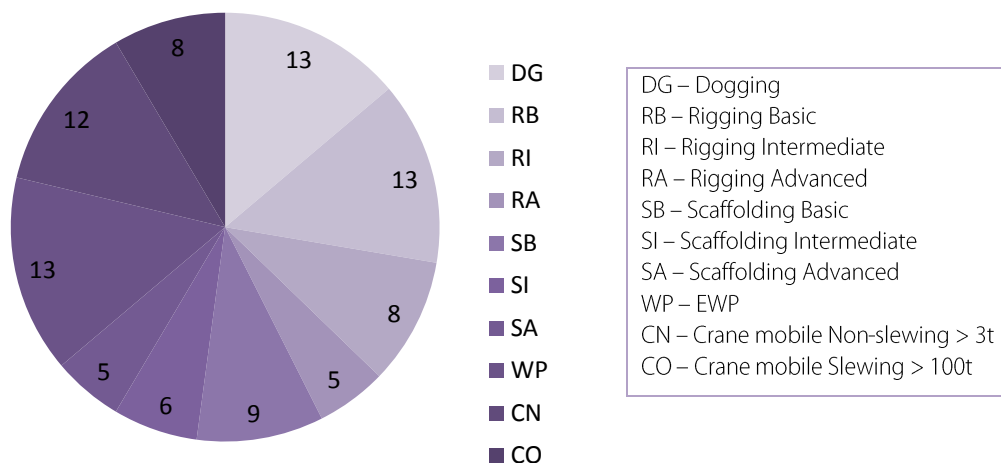
The most common training delivered by RTOs in the SIA sample were as follows:

- elevated work platforms (13 RTOs);
- dogging (13 RTOs);
- basic rigging (13 RTOs); and
- non-slewing mobile cranes greater than 3 tonnes capacity (12 RTOs).

Training delivered by the least number of RTOs were in the following areas:

- advanced rigging (5 RTOs);
- advanced scaffolding (5 RTOs); and
- intermediate rigging (6 RTOs).

Figure 2: Number of RTOs delivering HRWLs



The units of competency aligned to HRWLs were developed by four Industry Skills Councils (ISCs)⁴:

- Construction and Property Services (18 licence classes);
- Energy Skills Australia (2 licence classes);
- Manufacturing Skills Australia (2 licence classes); and
- Transport and Logistics (14 licence classes).

The 10 units of competency selected for the SIA were developed by Construction and Property Services (7 units with prefix CPC) and Transport and Logistics (3 units with prefix TLI).

Over 20,000 new licences were issued in 2014/2015⁵ for the 10 classes of licence related to the SIA unit of competency sample with the most common licence being for the operation of boom-type elevating work platforms.

⁴ ISCs have been replaced in January 2016 with Service Skills Organisations – see Appendix B

⁵ <https://www.commerce.wa.gov.au/worksafe/five-year-overview-high-risk-work-licences>

Table 2: Number of HRWL classes issued by WorkSafe 2014 – 2015

NUMBER OF NEW LICENCES ISSUED IN 2014/2015		
Unit of competency	Licence Class	Number issued*
CPCCLDG3001A Licence to perform dogging	DG	4,006
CPCCLRG3001A Licence to perform rigging basic level	RB	2,800
CPCCLRG3002A Licence to perform rigging intermediate level	RI	700
CPCCLRG4001A Licence to perform rigging advanced level	RA	1,037
CPCCLSF2001A Licence to erect, alter and dismantle scaffolding basic level	SB	768
CPCCLSF3001A Licence to erect, alter and dismantle scaffolding intermediate level	SI	341
CPCCLSF4001A Licence to erect, alter and dismantle scaffolding advanced level	SA	690
TLILIC2005A Licence to operate a boom-type elevating work platform (boom length 11 metres or more)	WP	9,294
TLILIC3006A Licence to operate a non-slewing mobile crane (greater than 3 tonnes capacity)	CN	993
TLILIC4011A Licence to operate a slewing mobile crane (over 100 tonnes)	CO	366
TOTAL	10	20,995
<i>*Extract from data on Department of Commerce website</i>		

RTOs choose which HRWL training to deliver based on their expertise and/or experience in the area or their choices are driven by the industries they served. A small number of RTOs indicated that their choices related to a commitment to safety in the industries they served.

1.3.2 Mandated assessment tools and meeting assessment requirements of the unit of competency

Units of competency that lead to the issuance of HRWLs specify that assessment must be undertaken using mandated National Assessment Instruments (NAIs). These NAIs are endorsed by Safe Work Australia and registered HRWL assessors must use the NAIs to assess a candidate's competency.

For all assessment instruments utilised by RTOs, the RTO is responsible for ensuring that any assessment instruments they use, regardless of the source, cover all requirements of the units of competency being assessed. This is relevant in all cases when RTOs develop assessment instruments in-house, or use commercial assessment resources, or any other resources provided from sources

external to the RTO. Similarly, RTOs are also required to ensure the NAI covers all requirements of the unit of competency being assessed.

If gaps are found, RTOs are required to supplement the assessment to address the gaps between the assessment instrument and the unit of competency requirements.

1.3.3 Role of Industry Regulators

WORKSAFE

In WA, the occupational licensing of workers conducting prescribed high risk work is regulated by the WorkSafe division of the Department of Commerce, which issues licences following delivery of training and assessment by RTOs.

WorkSafe issues 29 classes of licence related to high risk work (see Appendix C) and during the five year period from July 2010 to June 2015 WorkSafe processed and issued 267,432 new applications for all classes of WS High Risk Work Licence (not including licence renewals). Over 20,000 new classes of licence were issued in the past 12 months for the 10 classes selected as the focus of the SIA.

To be granted a licence by WorkSafe (or any other HRW licensing regulator in Australia) applicants must be able to demonstrate that they can meet a nationally agreed minimum standard. The RTOs that deliver this nationally recognised training must satisfy specified training and assessment requirements so that on completion of their training, applicants will be able to obtain an HRWL. Assessments must be carried out by WorkSafe registered HRWL assessors aligned to the RTOs and using mandated NAIs.

The *Occupational Safety and Health Regulations 1996* require that HRWL applicants provide a Notice of Assessment issued by a registered assessor and a Statement of Attainment issued by an RTO. Registered HRWL assessors conduct assessments on behalf of the WorkSafe Western Australia Commissioner that result in the issuing of a Notice of Assessment. The RTO, where they are also an assessor, are required to verify that the training and assessment (as conducted by the assessor) meets the requirements of the *Standards for RTOs* before issuing a Statement of Attainment for each unit of competency linked to a licence.

Because registered HRWL assessors are registered to perform a legislative function, they are deemed to be public officers and must operate within the limits of the Public Service code of conduct and code of ethics.

A person wishing to become a Registered HRWL assessor must meet specified criteria including:

- hold an HRWL for the class they wish to be registered;
- have extensive and recent operating experience in that class of HRWL, as a senior operator or supervisor;
- have completed a Certificate IV in Training and Assessment;
- demonstrate a sound knowledge of occupational safety and health legislation and Australian Standards as they relate to the HRWL class they seek registration for;

- successfully pass a written examination and interview conducted by WorkSafe; and
- a police clearance.

Registered HRWL assessors are subject to auditing by a WorkSafe audit and compliance investigator, at least once in the registration cycle (3 years). These audits are to ensure that assessors are complying with the conditions of their registration.

At the time of finalising this report, WorkSafe WA had conducted a series of 12 information sessions across WA strongly encouraging all registered HRWL Assessors registered under the *Occupational Safety and Health Regulations 1996* to attend. The sessions focussed on the requirements of the NAIs, including critical questions, the requirements for the knowledge and calculation assessment to be conducted before the performance assessments, optional questions, notices of assessment, validity and currency of instruments used and the assessor's role as a Public Officer acting on behalf of the WorkSafe Western Australia Commissioner. Further information about high risk work licensing in WA is provided in Appendix D.

DEPARTMENT OF MINES AND PETROLEUM

The Department of Mines and Petroleum (DMP⁶) is WA's regulator for extractive industries and dangerous goods and is responsible for ensuring the State's resources sector is developed and managed responsibly and sustainably for the benefit of all Western Australians. HRWLs are required at mine sites by *Regulation 6.37(1)(a)* whenever the use of plant and equipment at a mine relates to high risk work, as defined in the *Occupational Safety and Health Regulations 1996 (Reg 6.1)*. Unlike WorkSafe, DMP does not issue HRWLs.

DMP's Resources Safety Division promotes best practice in the areas of occupational safety and health with companies (and their employees) involved in the dangerous goods, mining and onshore petroleum industries. This is achieved by educating and regulating industry through the administration of various Acts including the *Mines Safety and Inspection Act 1994 (WA)* and *Mines Safety and Inspection Regulations 1995*.

The induction and training of employees on a mine site is covered in *Regulation 4.13* which identifies the duties of each responsible person at a mine including requirements for training and assessment. They must ensure that employees are given adequate instruction and training in safety procedures and systems of work and in the tasks required of them. They must also ensure that employees are assessed before commencing work at the mine to ensure they are competent to perform the tasks they will be assigned and competent to operate any plant and equipment they will be required to operate. Retraining and reassessment is also required whenever systems of work or plant and equipment are changed, or new systems of work or plant and equipment are introduced.

⁶ <http://www.dmp.wa.gov.au/About-Us-Careers/About-DMP-1422.aspx>

1.3.4 Verification of competency

The *Mines Safety and Inspection Act 1994*⁷ defines a competent person as "a person who is appointed or designated by the employer to perform specified duties which the person is qualified to perform by knowledge, training and experience". The requirement for employees to be assessed as competent onsite before commencing work appears to have been the reason for the emergence of processes referred to by industry as verification of competency (VoC).

VoC certificates have no status in the national vocational education and training (VET) system, although industry utilise the VoC process as a method of assessment that assists employers to meet occupational health and safety requirements and ensure staff are competent to operate equipment or perform a task. In WA, VoC services are conducted by both RTOs and others. The arrangements are variable and determined by the provider or in consultation with industry clients.

Through feedback collected from RTOs in the audit sample, some RTOs stated they developed their own assessments for VoCs and others used the NAs as the basis for VoCs, with feedback suggesting RTOs use a shortened version of the NAs, either with a more practical focus or using critical questions from the knowledge assessment combined with practical tasks.

According to employer survey responses collected as part of the SIA strategy, responses appear to indicate confusion as to the purpose of VoCs and their relationship to nationally recognised training. A number of responses indicated that VoCs should be standardised or be an accredited process through an RTO, however these comments were balanced by those who clearly understood the purpose of VoCs - that is, to cover site specific aspects of tasks using site-specific plant and equipment in accordance with site-specific procedures, and the role of the HRWLs was to provide the required safety knowledge and initial practical skills at the level of the unit of competency and related HRWL.

Anecdotal evidence informing the SIA strategy revealed practices of retraining employees resulting in instances of paying for the same or similar training on more than one occasion for an individual employee. These practices may be attributed to a lack of understanding or clarity in the various sectors about what a Statement of Attainment achieves within a national training system, the attainment of a licence and the application of VoC processes.

⁷ https://www.slp.wa.gov.au/legislation/statutes.nsf/main_mrtitle_599_homepage.html (p3)

2 OVERALL COMPLIANCE WITH THE STANDARDS

To maintain registration, RTOs are expected to demonstrate compliance with the national set of standards agreed by CISC at all times. The Council's quality assurance activities, including its audit strategy, are aimed at ensuring that RTOs continue to remain compliant with the standards.

The standards describe outcomes RTOs must achieve but do not prescribe the methods by which they must achieve these outcomes. This non-prescriptive approach:

- allows RTOs to be flexible and innovative in their VET delivery, and
- acknowledges that each RTO is different and needs to operate in a way that suits their clients and learners.

Audit findings for the 20 RTOs reviewed as part of the SIA were collected for the period October 2014 to December 2015 and included 12 RTOs specifically selected for the SIA and 8 RTOs audited as part of the Council's ongoing regulatory strategy. In September 2014 the CISC endorsed the new *Standards for RTOs* to replace the Australian Quality Training Framework Standards (AQTF), effective from 1 April 2015. Due to the transition in national standards, the audit findings bridge both sets of standards.

To enhance clarity, data from the audits undertaken under the AQTF have been aligned with equivalent standards under the *Standards for RTOs* and reporting is provided under the one set of standards covering the following areas:

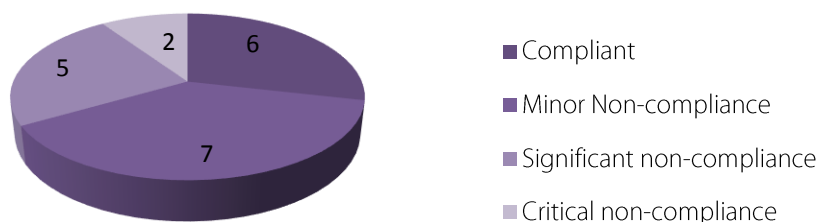
- amount of training;
- assessment in accordance with training package, industry and regulatory requirements;
- trainer and assessors' VET knowledge and skills, vocational competencies and industry currency;
- training, assessment and support services provided to meet the needs of learners and clients;
- marketing; and
- third party arrangements.

2.1 Overall compliance outcomes

As outlined in figure 3, the SIA found varying levels of compliance with the standards for the sample of RTOs audited :

- 70% were non-compliant with at least one of the standards, which contributed to the following overall audit findings for RTOs:
 - 35% were in the overall category of minor non-compliance;
 - 25% were in the overall category of significant non-compliance; and
 - 10% were in the overall level of critical non-compliance.
- 30% of RTOs were fully compliant with the standards audited.

Figure 3: Overall levels of non-compliance across 20 RTOs



A definition of the categories of non-compliance are outlined at Attachment 1.

In any industry, one RTO operating in non-compliance is not acceptable, and in this industry where the safety of individuals is paramount, evidence of non-compliant training and assessment practices is extremely alarming. The proportion of providers with an overall level of non-compliance that was significant or critical (35%) and the proportion of providers with at least one non-compliance relating to assessment (55%) raises significant concern.

The findings demonstrate that the concern expressed by industry stakeholders is justified, particularly in the context of high risk work and associated safety implications, and that immediate action is required to address the audit findings.

2.1.1 Overall compliance outcomes by standards

The audit outcomes raised issues of concern in the key areas of deployment of the RTOs strategies for training and assessment and assessment practices and highlighted areas of strength within the HRWL marketplace as outlined below:

The highest number of non-compliance were found to be in relation to the following standards:

- RTO meets all requirements specified in the relevant training package;
- RTO implements an assessment system (including RPL) that complies with the training package requirements and is in accordance with the principles of assessment and the rules of evidence; and
- strategies and practices, including amount of training, are consistent with training package requirements and enable each learner to meet the unit of competency requirements.

These non-compliances were found in approximately 50% of the RTOs found non-compliant in the audit sample.

- non-compliances were reported for some RTOs in relation to:
 - provision of educational and support services to meet the needs of learners; and
 - industry engagement to ensure industry relevance of training and assessment practices, resources and currency of trainer/assessor skills.

- all RTOs were fully compliant with the standards relating to:
 - provision of sufficient trainers and assessors to deliver the HRWL units;
 - employment of trainers and assessors with requisite vocational competencies; and
 - issuance of certification documentation only to learners who have been assessed as meeting the training product requirements.

Figure 4: Overall compliance outcomes



2.1.2 Compliance by Standard and Clause

The following information provides an overview of the level of compliance against the standards which relate to the key focus areas of the SIA where non-compliances were found and outlines the factors that contributed to the compliance findings.

Standard 1

The *Standards for RTOs* require that:

Clause 1.1 The RTO’s training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

Note: The requirement for RTOs to determine and justify the amount of training was not specifically included in the AQTF, so the information that follows at clause 1.2a and 1.2b only relates to RTOs audited during the period October to December 2015 against the Standards for RTOs.

Compliance Findings

Of the 20 RTOs audited:

- 9 (45%) were not compliant with this clause; and
- 11 (55%) were compliant with this clause.

Factors impacting on compliance included:

- lack of details regarding how the RTO accommodates or provides adequate details pertaining to the diversity of the learners, or how the RTO differentiates between learner groups when amending the practice deployed as opposed to that detailed in the strategy;
- lack of accurate information regarding how the training and assessment practices were consistent with the requirements of the training package;
- delivery and assessment times were not justified and did not accurately reflect the content, complexity and mandated specifications of the training;
- scheduling for assessment was unclear and contained information that was inconsistent with the data recorded on the WorkSafe Notice of Assessment;
- RTO not ensuring that a client's facilities and equipment meet the requirements of the unit of competency; and
- the strategies were not consistent with the practice and did not demonstrate how the requirements of the training package were met to enable each learner to meet the requirements for each of the units of competency.

Clause 1.2a For the Purpose of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to the existing skills, knowledge and the experience of the learner.

Compliance Findings

Of the 12 RTOs audited:

- 7 (58%) were not compliant with this element; and
- 5 (42%) were compliant with this element.

Factors impacting on compliance included:

- the RTO was unable to demonstrate how the amount of training was determined;
- insufficient or no evidence provided that the RTO considered the existing skills, knowledge and experience of the learner in determining the amount of training they provide to each learner; and
- the RTO combined two units of competency together without adjusting the timeframe for the delivery and assessment of the two units.

Clause 1.2b For the Purpose of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to the mode of delivery.

Compliance Findings

Of the 12 RTOs audited:

- 6 (50%) were not compliant with this clause; and
- 6 (50%) were compliant with this clause.

Factors impacting on compliance included:

- lack of evidence of how the RTO considered the mode of delivery to determine the amount of training they will provide to each learner; and
- timeframes for the delivery of combined units of competency were shortened without any analysis made to ratify the changes to the delivery and assessment time taken.

Clause 1.8a The RTO implements an assessment system that ensures that assessment (including recognition of prior learning) complies with the assessment requirements of the relevant training package or VET accredited course.

Compliance Findings

Of the 20 RTOs audited:

- 11 (55%) were not compliant with this clause; and
- 9 (45%) were compliant with this clause.

Factors impacting on compliance included:

- the assessments were not being conducted in accordance with the training package or unit of competency;
- there was a lack of written evidence regarding the verbal questioning of the learner;
- some RTOs had amended the NAI in violation of the guidelines for the administration of this tool; and
- the mandatory assessment tool was not being used correctly.

Clause 1.8b The RTO implements an assessment system that ensures that assessment (including recognition of prior learning) is conducted in accordance with the Principles of Assessment and the Rules of Evidence

Compliance Findings

Of the 20 RTOs audited:

- 11 (55%) were not compliant with this clause; and
- 9 (45%) were compliant with this clause.

Factors impacting on compliance included:

- insufficient numbers of assessments to determine accurately the competence of the learner; and
- lack of evidence proving the learner correctly answered questions during the assessment.

Clause 1.16 The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

Compliance Findings

Of the 20 RTOs audited:

- 5 (25%) were not compliant with this clause; and
- 15 (75%) were compliant with this clause.

Factors impacting on compliance included:

- the RTOs found to be non-compliant did not provide professional development for all of their trainers and assessors.

The audit outcomes have contributed to the development of key findings of the SIA in conjunction with the employer survey, student interview and key stakeholder interview. The key findings are outlined in Chapter 4.

3 EMPLOYER SURVEY

An online survey was developed and conducted to seek feedback from businesses who employ HRWL holders to gain an understanding of the employer's perspective on HRWL training and to identify areas for improvement.

The survey sought information on:

- how satisfied employers were about the training being provided by RTOs;
- employer opinion on the ability of recently trained HRW licence holders to meet industry requirements;
- employer confidence in the training and assessment as an indicator that a person should get their HRW licence; and
- general comments on the experience or perceptions as employers of licensed HRW staff/contractors.

A total of 150 responses were received from employers or contractors who employ and contract people with HRWLs. Survey participants represented a number of industry sectors as follows:

- construction - 66%;
- resources - 36%;
- transport and logistics - 6.7%; and
- miscellaneous - 7.3%.

It should be noted that some companies participated in multiple sectors. The resources companies were generally large businesses and the construction companies were generally small and medium-sized businesses. The survey participants were drawn from across the State, many with multiple locations in both Perth and regional areas. Just under 60% of survey participants were located in the Perth and Peel regions and 64% had locations in regional WA. Participants represented a mix of business sizes, with just under half being large businesses (100+ employees).

Responses were analysed and included in a survey report with key outcomes and issues included in the body of the report. A copy of the employer survey report is provided at Attachment 4.

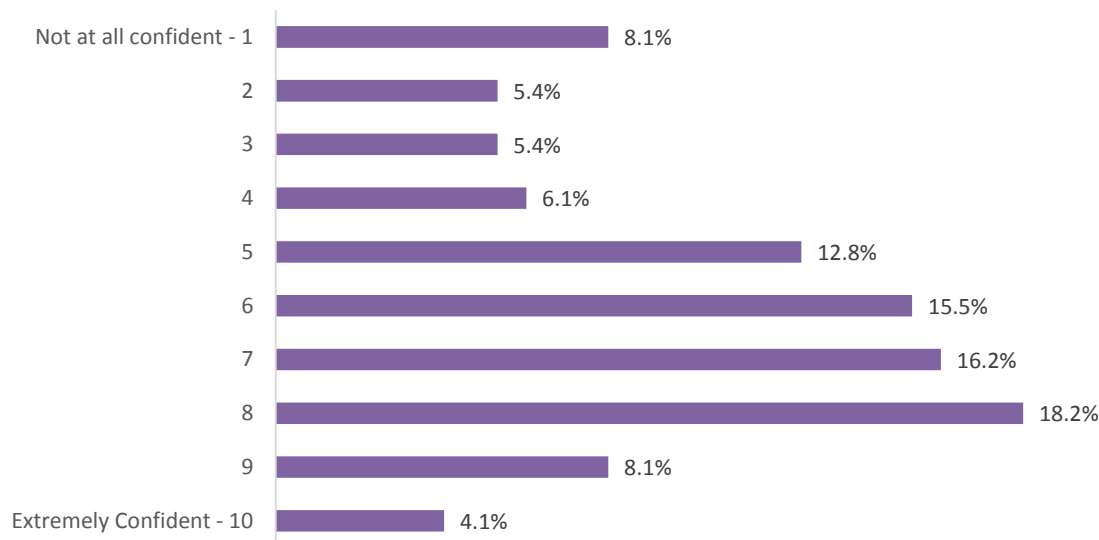
3.1 Survey outcomes

The following information provides an overview of the survey outcomes which relate to the key focus areas of the SIA.

3.1.1 Lack of confidence in the competency of new employees or contractors issued a HRWL

Although 63.8% of employers rated their satisfaction with the HRWL training delivered as 8 out of 10 or higher (a high level of satisfaction), the proportion of employers who have high levels of confidence in the competency of employees and contractors is small. Only 4.1% of survey participants are extremely confident in the competency of those with a basic HRWL and only 30.4% gave a rating of 8 out of 10 or better.

Figure 5: Level of confidence that the licence holder is competent after a basic licence course

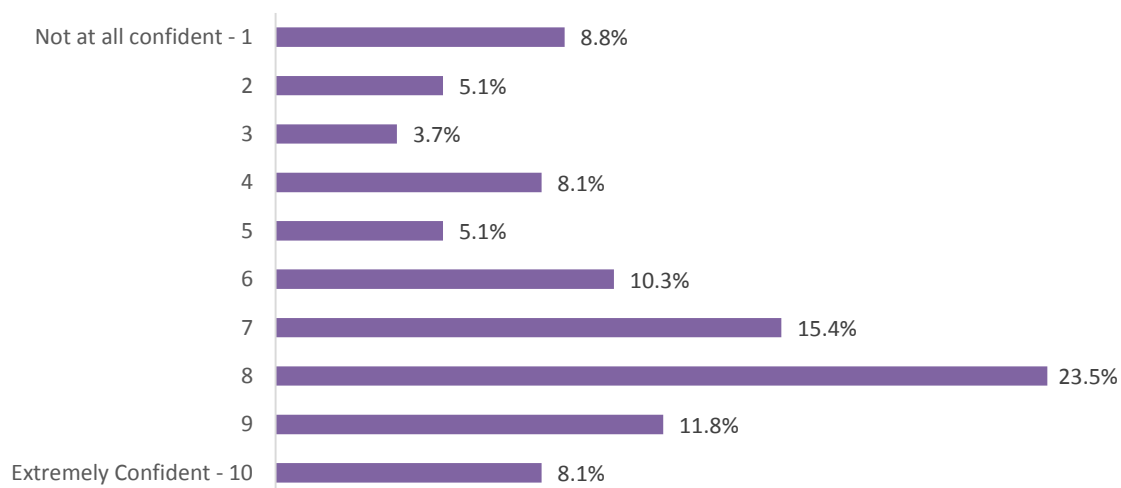


Employer confidence in the competency of employees with both basic and those with advanced HRWLs is 4.1% of survey participants rating their level of confidence in the competency of those with a basic HRWL as 10/10 and 12.2% rated their confidence as 9 or 10/10.

The figures are only marginally better for the advanced HRWLs – 8.1% of survey participants rating the competency of employees and contractors with an advanced HRWL as 10/10 and 19.9% as 9 or 10/10.

“People must gain experience at the basic level before advancing further. It is absurd that someone can hold an advanced rigging ticket and never been on a job.”

Figure 6: Level of confidence that the licence holder is competent after an advanced licence course



The single main factor for this lack of confidence is the lack of practical experience required to get the ticket (25 mentions).

“The construction and mining industry have built a rod for their own back where they require advanced qualifications for personnel on site, but don't require a minimum level of experience. It is possible for someone to sit in a classroom for 20 days and obtain an advanced riggers ticket with no more experience than what is gained in the course. I have a little, albeit reserved, confidence in the people holding the license have the skills, knowledge and experience to perform the role to an adequate level of practical competency.”

“There are occasions when employees or contractors have completed course levels one after the other, but have no practical skills in application to real life scenarios.”

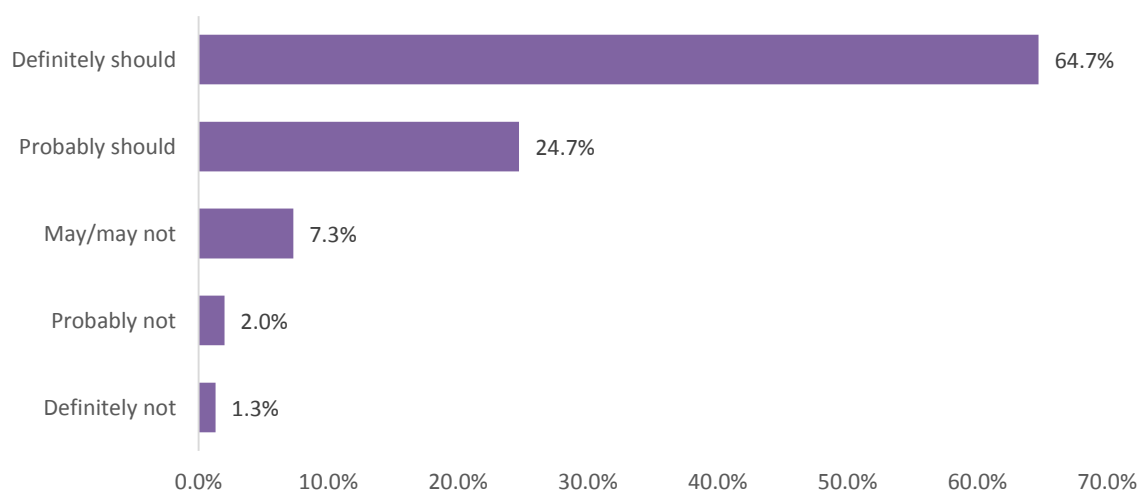
“A person with no experience in construction work or even in scaffolding can complete an advanced HRWL in scaffolding and immediately begin work erecting/dismantling scaffold up to 45 meters in height. I see scaffolding on worksites which is non-compliant and when I speak with the scaffolds they are not aware of the scaffolding safety requirements (codes and standards)”

‘It’s very text booky. The biggest problem is they need to know what to do when things go wrong. That is what makes good riggers, you just can’t teach that stuff (in the classroom).’

3.1.2 Call for practical experience

Overall, 89.4% of survey participants support the implementation of a **set level of workplace experience** at a basic level before an employee can obtain an intermediate licence and further workforce experience before progressing to an advanced licence. 64.7% believe this should definitely be a requirement.

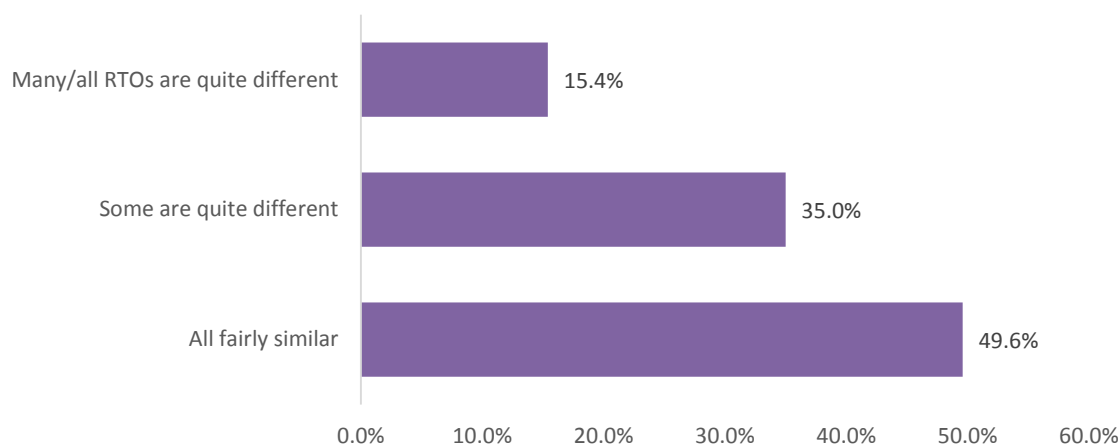
Figure 7: Support for the implementation of a set level of workplace experience



3.1.3 Concerns with consistency

The survey indicates that there may be a lack of consistency between RTOs in delivering the training outcomes which is supported by the RTO audit findings. Only half the survey participants felt that HRWL training course attendees graduate with similar levels of skills and competency regardless of the RTO attended. Those who reported inconsistencies were the least satisfied with HRWL training.

Figure 8: Competency and skill level between RTOs for the same HRWL

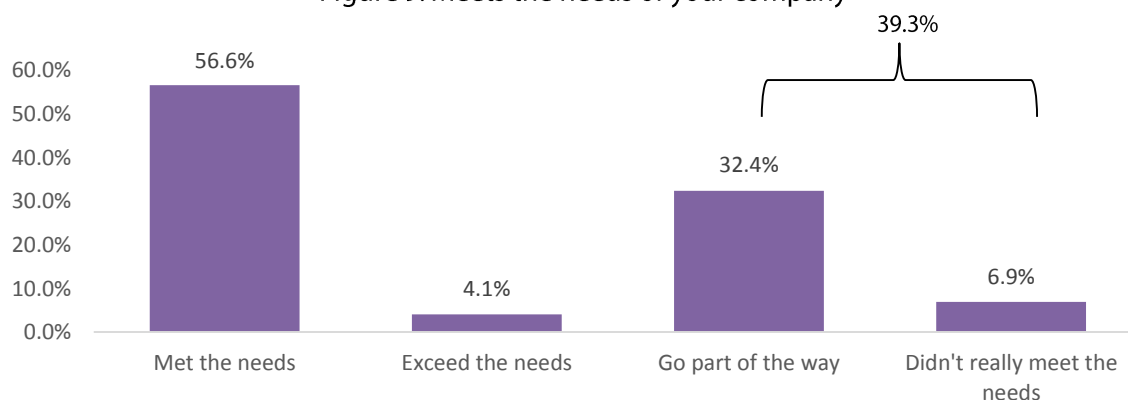


3.1.4 Training meeting employer’s needs

56.6% of survey participants report that the set of skills required to obtain the HRWL are appropriate to the needs of their business. A further 4.1% report that the skills required are more than needed for the job role they are employing for. The remaining 39.3% find the skills required to obtain the HRWL don't meet the needs of their business, although most of these (32.4%) find they go part way. Only 6.9% report they don't really meet the needs of their business.

The main area where needs are not being met relates to the level of practical experience required to obtain the qualification delivered. There is a concern that there is too much emphasis on “book learning” rather than hands on experience in a variety of environments.

Figure 9: Meets the needs of your company



Other improvements suggested by employers were:

- a review of the course content to ensure that a core set of skills are taught by each RTO which are fit for purpose;
- a mandated minimum time period between completing units of competency during which candidates needed to work in the occupation;
- a review of the quality and consistency of the RTOs, trainers and assessors, both in:
 - the ability to teach the subject; and
 - their competency and the currency of their knowledge.
- the Council should have the legal authority to enforce its audits and suspend or shut down RTOs that are non-conforming; and
- verification of competency should be undertaken independently of the RTO doing the training.

In many areas, survey responses echo stakeholder concerns contributing to the reasons for initiating the SIA. Calls for more practical experience, the lack of employer confidence in the competency of those with a basic HRWL, and calls for improved regulatory levers escalate the need for urgent attention to address the issues and findings highlighted throughout this report.

The employer survey report is provided at Attachment 4.

The survey outcomes have contributed to the development of key findings of the SIA. The key findings are outlined in Chapter 4.

4 KEY FINDINGS

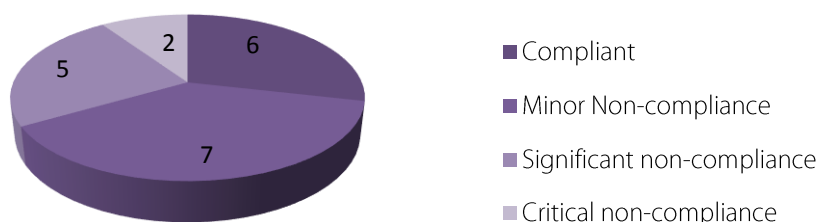
4.1 Variability of compliance

As outlined in chapter 2, a key finding of the SIA was the varying levels of compliance with the standards for the sample of RTOs audited.

70% were non-compliant with at least one of the standards, which contributed to the following overall audit findings for RTOs:

- 35% were in the overall category of minor non-compliance;
- 25% were in the overall category of significant non-compliance; and
- 10% were in the overall level of critical non-compliance.

Figure 10: Overall levels of non-compliance across 20 RTOs



The highest number of non-compliance were found to be in relation to the following standards:

- RTO meets all requirements specified in the relevant training package;
- RTO implements an assessment system (including RPL) that complies with the training package requirements and is in accordance with the principles of assessment and the rules of evidence; and
- Strategies and practices, including amount of training, are consistent with training package requirements and enable each learner to meet the unit of competency requirements.

Significant and critical levels of overall non-compliance (35%) and the proportion of providers with at least one non-compliance relating to assessment (55%) is of critical concern given the nature of the training provided in the context of high risk work and associated safety implications. Ongoing monitoring of RTOs' compliance is required to provide assurance that quality standards are being met.

Key Findings

- There were varying levels of compliance with the standards:
 - 70% of RTOs were non-compliant with one or more of the standards;
 - 60% of non-compliant RTOs had overall levels of significant or critical non-compliance; and
 - 30% of RTOs were fully compliant with all standards audited.
- The areas of highest non-compliance are in relation to the assessment standards and meeting the training package specifications, which compromise assessment outcomes.
- There were varying levels of compliance between different HRWL units:
 - higher levels of non-compliance were found for Rigging Basic and Advanced, Scaffolding Intermediate and Advanced and Crane mobile slewing >3tonne compared to the other licensing units.
- The variability in the levels of compliance with the standards results in inconsistency in the quality of HRWL training outcomes and confirms industry concern about the lack of consistency in competencies of employees who have undertaken HRWL training.
- All RTOs demonstrated compliance with the standards relating to:
 - provision of sufficient trainers and assessors to deliver the HRWL units;
 - employment of trainers and assessors with requisite vocational competencies; and
 - issuance of certification documentation only to learners who have been assessed as meeting the training product requirements.

4.2 Assessment practices

It is widely acknowledged that poor assessment practices are at the heart of issues undermining the quality of VET outcomes. Training and assessment are the core business of an RTO and discussion and debate about how to improve assessment practices is commonplace amongst stakeholders including industry, government and VET professionals, and training and assessment practices across the HRWL area is not immune to these concerns.

In relation to the SIA, a key concern raised by industry stakeholders included anecdotal evidence of poor assessment practices amongst registered HRWL assessors. Key stakeholders believed that assessment practices were not robust enough to give industry confidence in assessment outcomes. Feedback from industry suggested that assessment practices, including assessment against the unit of competency, and use of the NAs were not meeting the requirements of the *Standards for RTOs* and legislative requirements underpinned by the *Occupational Safety and Health Regulations 1996*.

Audits checked whether or not assessments complied with the requirements of the standards (in terms of meeting the rules of evidence and principles of assessment), and whether or not the individual requirements of the unit of competency from the relevant Training Package were met. Further, units of competency that lead to the issuance of HRWLs specify that assessment must be

undertaken using NAIs. These NAIs are endorsed by Safe Work Australia and registered HRWL assessors must use the NAIs to assess a learner's competency.

For all assessment instruments utilised by RTOs, the RTO is responsible for ensuring that any assessment instruments they use, regardless of the source, cover all requirements of the units of competency being assessed. This is relevant in all cases when RTOs develop assessment instruments in-house, or use commercial assessment resources, or any other resources provided from sources external to the RTO. Similarly, RTOs are also required to ensure the NAI covers all requirements of the unit of competency being assessed.

The SIA found that:

- 55% (11) RTOs were found to be non-compliant with the assessment requirements across the standards;
- in most cases, multiple causes contributed to non-compliance, with incorrect deployment of the NAIs by HRWL Registered Assessors being a common factor; and
- only one RTO in the sample outsourced training and assessment services to a third party, and this RTO demonstrated compliance against the standards. Concerns about third party arrangements in the delivery of training and assessment for HRWLs were not able to be substantiated by the audit data or survey responses.

The *Standards for RTOs* require that:

Clause 1.8 The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):

- a) complies with the assessment requirements of the relevant training package or VET accredited course; and
- b) is conducted in accordance with the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2. (refer Appendix E for tables).

Audit findings for the RTO sample audited against the *Standards for RTOs* showed that:

- 67% (8) RTOs did not follow the instructions in the NAIs as required;
- 58% (7 RTOs) marked incorrect answers in the knowledge section of the NAIs with no further assessment evidence recorded;
- 50% (6) RTOs did not provide evidence that oral assessments occurred when those candidates were awarded a 'competent' outcome; and
- possible coaching of learners evidenced by almost word-for-word copies of NAIs used immediately prior to assessment, were identified in 17% of RTOs (2).

These practices compromised assessment outcomes because assessment processes could not be confirmed as valid. There was no evidence to confirm the assessment decision was reliable (or safe), therefore breaching the principles of assessment. Incomplete records meant that there was no evidence to confirm that all required assessments were completed. Further, this meant there was no evidence to confirm the validity, sufficiency or authenticity of the evidence relied upon to make the

assessment decision that candidates were competent. Refer to Appendix E for the rules of evidence and principles of assessment table.

In regard to the mandated NAIs, there is a common view expressed by various stakeholders that requires attention, and that is the design of the NAIs are a factor that significantly contributes to poor assessment practices and outcomes. Feedback from RTOs and TAC Auditors during the SIA corroborates these views with some assessment compliance issues directly attributed to issues linked to the design and instructional use of the NAIs. An outcome of this SIA includes that issues identified regarding the NAIs are forwarded to Safe Work Australia for their consideration in the review and future development of the instruments. Further, the recommendation is expanded to include that the AISC consider that the outsourcing of the development and design of mandated assessment instruments potentially compromises an RTO's ability to correctly apply assessment requirements set out by the units of competency and the *Standards for RTOs*.

Although the conduct and outcomes of practical assessments contributed to the non-compliant outcomes already described, the importance of practical skill development and the associated practical assessment tasks that must be satisfactorily completed by all candidates, warranted additional attention. For 50% (6) of the RTOs audited against the *Standards for RTOs*, issues related to practical assessments contributed to the non-compliant outcomes. Non-compliant practices were identified from past student records or were observed by technical advisors and auditors during site audits where observation of practical training and/or assessment was undertaken in line with the audit approach. Issues such as incomplete practical assessments, failure to provide required equipment or loads, incorrect sequencing of the practical assessments, unsafe equipment and unsafe practices were of concern and supported industry concerns about the quality of practical skills assessment for units of competency leading to HRWLs.

There was evidence of assessments undertaken for multiple students or courses, where assessment records were not completed at the time of assessment but at a later date, with the recorded dates reflecting the time of signature, rather than the dates of assessment. At audit these records were found to be inconsistent with RTO enrolment and attendance data which showed when actual training and assessment occurred. This may explain anomalies in Notices of Assessment (a requirement that is submitted by assessors to WorkSafe) where assessors appear to assess multiple courses all at the same time, assessing large numbers of students at the same time and being in two places at the same time.

The practice of completing multiple student records from memory at a later date calls into question validity, reliability and fairness of the assessment process and the validity and authenticity of the assessment evidence recorded. The principles of assessment and the rules of evidence have not been met in this scenario.

Assessors need to meet their responsibilities with regard to correct completion, dating and signing of official assessment records and RTOs must have processes to ensure this happens, to identify gaps and address lapses so that all records are complete. This is critical as candidates are being deemed competent without sufficient evidence on hand to corroborate the decision. These practices compromise assessment and impact on the overall credibility of HRWL assessments.

Practical assessment undertaken in a group situation was conducted by 25% (3) of the RTOs audited against the *Standards for RTOs*. One RTO was found to conduct assessment with candidates in pairs with each one assessed individually undertaking the required tasks. This practice addressed the rules of evidence and met the requirements of the Training Packages and complied with assessment instructions in the NAs. However, the remaining two RTOs that undertook group assessments could not provide evidence that candidates within the groups were individually assessed undertaking all required tasks. Recording observations during live performance is an integral component of sound assessment practice, as recording information later from memory undermines the integrity of the process and the outcomes. In this case the RTOs did not have all the required equipment and materials for some of the mandated practical assessment tasks, so that assessment was compromised and the records were incorrect. No other RTOs in the sample conducted group assessments.

Key Findings

- High levels of non-compliance with assessment standards were found noting that assessment contributed to an overall finding of significant or critical non-compliant in 35% of the audit sample. This validates industry's concerns about the quality of assessment for HRWL units.
- Most of the non-compliances were due to insufficient evidence to confirm that the assessment requirements of the HRWL units the Principles of Assessment and the Rules of Evidence had been met.
- Poor assessment practices have resulted in compromised assessment outcomes.

4.3 Duration of training and assessment

Industry stakeholders raised concerns that the amount of training allocated for training and assessment activities per learner was not sufficient to enable them to meet the requirements of the units of competency. There were anecdotal reports of significantly reduced timeframes for training and assessment, including where RTOs cluster (combine) units of competency to achieve shorter timeframes for training and assessment.

The RTO's training and assessment strategies and practices must have regard to the amount of training required for the learner to gain the competencies as specified in the relevant training package or VET accredited course, and the amount of training will vary depending on the existing skills and knowledge of the learner and the mode of delivery. RTOs determine, and include within their training and assessment strategies, the amount of training they provide to enable each learner to meet the requirements for each unit of competency in which they are enrolled.

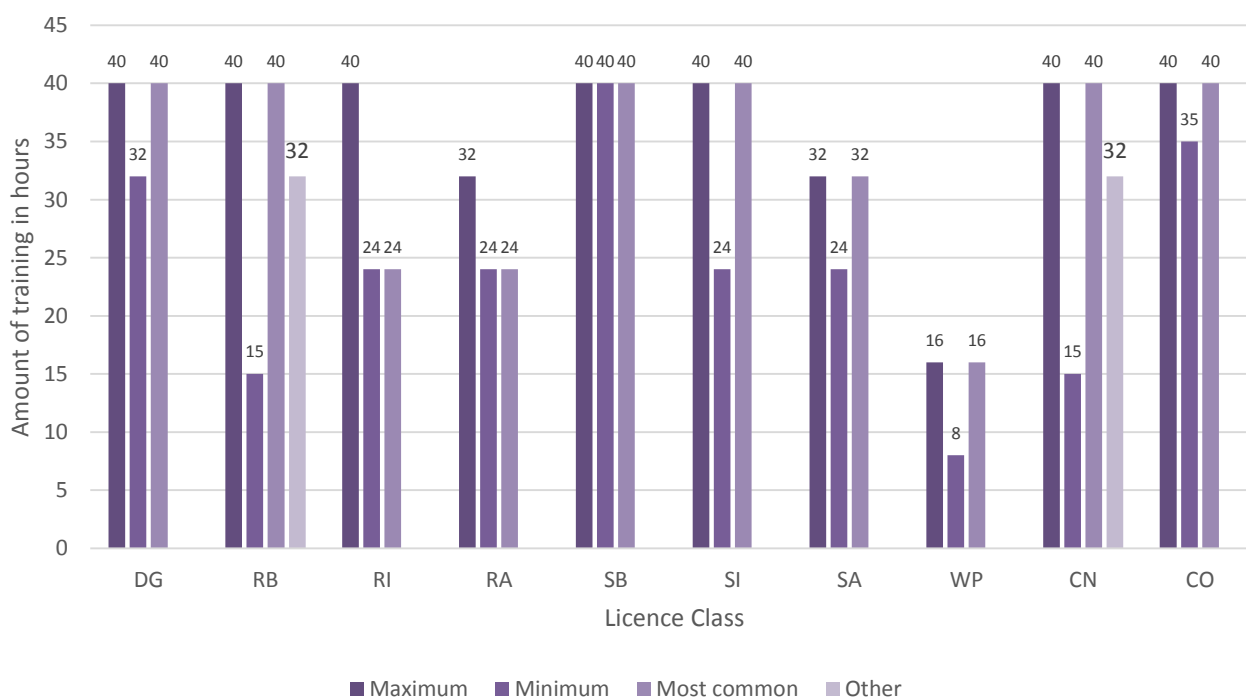
Note, the requirement for RTOs to determine and justify the amount of training was not specifically included in the *AQTF*, so the information that follows only relates to RTOs audited against the *Standards for RTOs*.

The SIA found that:

- 58% (7) RTOs were unable to justify how course lengths had been determined to suit individual learners;
- course hours across all licence classes ranged from 15 hours to 40 hours;
- 58% (7) of the RTOs audited clustered (combined) units of competency, including 4 RTOs that combined courses resulting in reduced timeframes;
- a number of RTOs in the audit sample confirmed that they had been pressured by employers to shorten their courses and/or had lost business to RTOs delivering courses in shorter timeframes; and
- outcomes of the SIA confirm reports from industry stakeholders, including RTOs, of reduced timeframes for training and assessment.

Audit evidence confirmed that there was variation of one day at most for dogging, advanced rigging and advanced scaffolding (three to four days) and a two-day variation for intermediate scaffolding and intermediate rigging (three to five days). Timeframes for basic scaffolding and open crane were the same across the RTOs with these on scope. The greatest disparity was a single RTO delivering basic rigging and non-slewing crane in 15 hours per course, compared with other RTOs delivering the same courses in four to five days. The following graph shows the range of training hours for each licence class in terms of maximum recorded hours, minimum hours, the most common number of hours across RTOs and 'other hours' – those not included in the other three categories.

Figure 11: Range of delivery hours for each licence class



DG – Dogging	SI – Scaffolding Intermediate
RB – Rigging Basic	SA – Scaffolding Advanced
RI – Rigging Intermediate	WP – EWP
RA – Rigging Advanced	CN – Crane Mobile Non-slewing > 3t
SB – Scaffolding Basic	CO – Crane Mobile Slewing > 100t

The audits also revealed that for 42% (5) of the RTOs, strategies for training and assessment did not reflect actual practice. Commonly these strategies showed unit by unit delivery whereas in practice, units were either clustered or delivered consecutively in combined courses with more than one licence as the outcome.

Clustered or consecutive (basic to intermediate to advanced) delivery was reported for 58% (7) of the RTOs audited. For 25% (3) of the RTOs the amount of training for combined courses was the same as the sum of hours for the individual courses. For the remaining four RTOs combined courses were delivered in reduced timeframes – less than the sum of the hours assigned to individual course delivery.

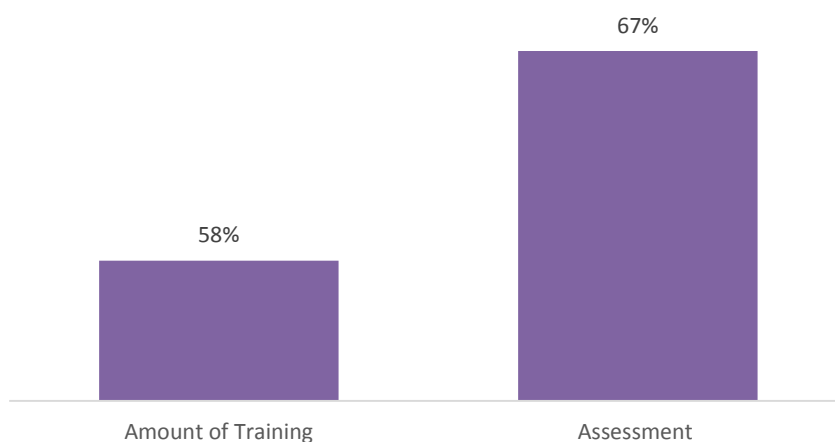
The number of learners per course also has an impact on the timeframes for training but most HRWL courses had similar student numbers – a maximum of eight to 10, or eight to 12. No course sizes exceeded 12, however there were some variations at the low end of the scale with some RTOs restricting numbers to two or four participants.

To determine if there was a correlation between audit outcomes for course durations and audit outcomes relating to assessment, data from the audits were cross-referenced to the amount of training provided by compliant and non-compliant RTOs. In summary:

- five RTOs compliant with the amount of training requirements ran all courses with the maximum recorded timeframes;
- four of these RTOs did not provide clustered or consecutive delivery of the units of competency;
- comparison of the audit outcomes for assessment versus the course durations revealed a similar result with all four RTOs demonstrating compliance against the assessment requirements delivering all their courses in the maximum recorded timeframes; and
- RTOs delivering some of their courses in the minimum recorded timeframes were all non-compliant with the amount of training requirements and/or assessment requirements.

The data indicates that delivery of courses in shorter timeframes corresponds to higher non-compliance with the standards.

Figure 12: Non-compliance - amount of training and assessment



Anecdotal evidence from a range of industry stakeholders suggested that industry pressure was driving short durations of training at the lowest price. All RTOs who responded to a question about industry pressures during the audits said they had experienced pressure by industry clients to shorten their courses and some had also been pressured to lower their costs. These RTOs reported losing business as a result.

Many responses were provided, among them:

“... lost work due to not bowing to pressures to deliver as an example open crane in 2 days”

“regularly get phone calls asking for quotes and during the conversation get told ... ‘we will be going for the cheapest price’...”

“[We] don’t bow to industry requirements relating to shorter programs and lower costs as [we] would like the areas of dogging, rigging and scaffolding to be longer than the current delivery periods”

“Many companies are not looking at quality, they just want their people GIVEN a ticket and do not care how, as they think it is not their responsibility”

“Genuine courses get questioned by industry ... ‘why can you not run it [combined course] in the same time?’ rather than question those running short courses”

“... can’t compete with some low priced courses, and also those RTOs who are offering shorter programs ... [we] also only offer one ticket which is not attractive to many learners/clients as other RTOs offer two or three tickets in the same timeframe.”

In these cases, some RTOs were insistent that they would not reduce training times, increase class sizes or deliver training for multiple licences in the same timeframe as for a single licence in order to cut costs, however audit outcomes reflect that these pressures are contributing to the quality of assessment practice and course duration.

RTOs were asked how they felt about a suggestion that minimum timeframes for training and assessment should be mandated. 67% (8) of the RTOs were in favour of this suggestion with the proviso that minimum timeframes must be realistic and combined with set maximum class sizes. RTOs stated that this would also allow a level playing field for RTOs.

Key Findings

- The duration of training for HRWL units varied between 15 and 40 hours.
- 58% of the RTOs audited were unable to justify how the skills, knowledge and experience of individual learners have been taken into account in determining the duration of training.
- The inability by some RTOs to justify training duration may indicate insufficient learning opportunities to develop knowledge and skills and insufficient assessment time to ensure all unit requirements are able to be demonstrated.
- There is a direct relationship between delivery of courses in shorter timeframes and higher non-compliance with the standards.

4.4 Trainers and assessors

The *Standards for RTOs* require that RTOs have sufficient trainers and assessors consistent with its scope of registration and its training and assessment strategies. The standards also require that the RTO's training and assessment is delivered only by persons who have:

- vocational competencies at least to the level being delivered and assessed;
- current industry skills directly relevant to the training and assessment being provided;
- current knowledge and skills in vocational training and learning that informs their training and assessment; and
- the RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment (Clause 1.16).

The SIA found that:

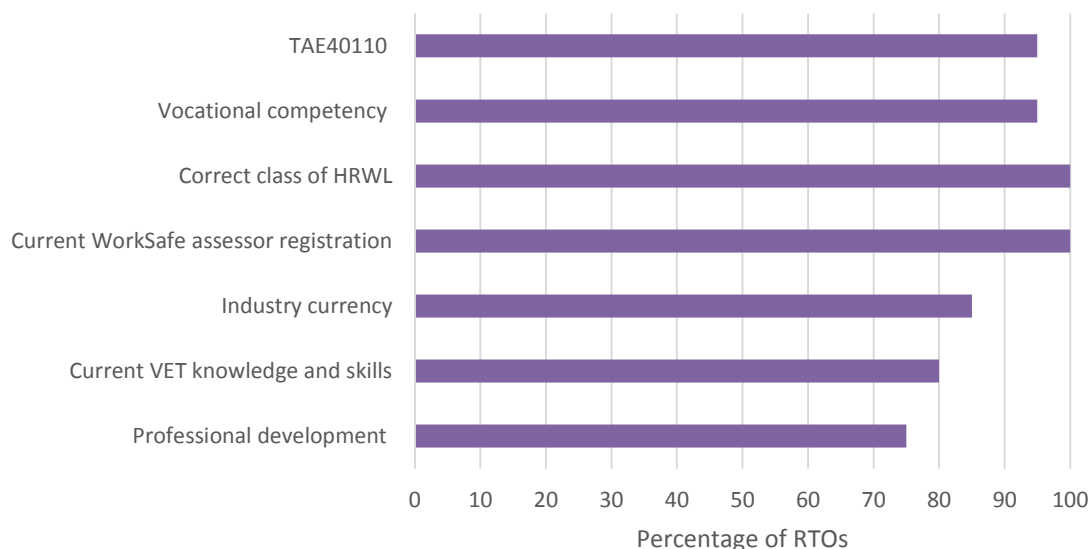
- all RTOs in the audit sample demonstrated they had sufficient trainers and assessors for the HRWL units they delivered and 80% (16) RTOs demonstrated their assessors held the actual unit of competency they were delivering and assessing;
- 95% (19) RTOs were able to demonstrate their assessors met the requirements for vocational competency;
- 85% (17) RTOs were able to provide sufficient evidence of industry currency for trainers and assessors;
- 95% (19) RTOs held the TAE40110 Certificate IV in Training and Assessment;
- 25% (5) RTOs were unable to demonstrate that their trainers and assessors were undertaking ongoing professional development to ensure they continued to develop as professional trainers and assessors; and
- concerns raised about the vocational competencies and industry currency of HRWL trainers and assessors were not supported by audit outcomes.

In WA only a WorkSafe registered HRWL assessor can issue a Notice of Assessment which is required to obtain a HRWL licence. Registered HRWL assessors are required to meet specified criteria, including holding a HRWL for the class they wish to be registered in; extensive and recent operating experience as a senior operator or supervisor in that class; completion of the Certificate IV in Training and Assessment; sound knowledge of OSH legislation and Australian Standards as they relate to that class; successfully passing a WorkSafe examination and interview and a Police Clearance. Registered HRWL assessors are also subject to ongoing WorkSafe audit and compliance requirements.

Industry stakeholders raised concerns about the vocational competencies and industry currency of HRWL trainers and assessors. There were anecdotal reports that HRWL trainers and assessors did not demonstrate these requirements.

The audit found all trainers and assessors were WorkSafe registered HRWL assessors and held the relevant class of HRWL licence. They also met all the vocational competency and industry currency requirements of the standards.

Figure 13: Trainer and assessor competencies and professional development



A high proportion of trainers and assessors (95%) held the TAE40110 Certificate IV in Training and Assessment; however, there was also a high degree of non-compliance in regard to ongoing professional development as a trainer or assessor which could be a contributing factor in the high level of non-compliance in the areas of assessment.

Key Findings

- Trainers and assessors met all the vocational competency and industry currency requirements of the standards.
- Almost all HRWL trainers and assessors held the TAE40110 Certificate IV in Training and Assessment, however there is evidence of a lack of ongoing professional development in VET knowledge and skills. This may be a contributing factor in the poor assessment practices.
- The majority of RTOs were compliant with the standards relating to the vocational competency and industry currency of HRWL trainers and assessors.

4.5 Disparity in employer expectations and HRWL outcomes and support for higher levels of practical experience

Employer feedback indicated that not all employers fully understand the purpose of the training and licensing regime or understand the concept of 'competency' as it applies within the vocational education and training system. The outcomes of nationally recognised training and licences that are issued on the basis of successful completion, are not intended to provide employers with an indication of the depth and breadth of experience the candidate has in application of the skill in the workplace.

Within a vocational education and training setting, competency relates to a person meeting all the requirements specified in the unit of competency within the training environment. If practical onsite experience is not specified in the units of competency as is currently the case, this may indicate a gap in the unit of competency.

A number of verbatim comments from the employer survey indicated some of the employer views on what it means to be competent, reflect the views related to the individual's competency as an employee and competent worker as opposed to their competency following training.

"... experience is the key to a competent worker ..."

"A few days of training do not guarantee a person is competent on the job. Several hours of practical training should be mandatory."

"Needs are met by achieving the regulatory license requirements for high risk work, however they are not met entirely from the perspective of actual competence"

"Training over a set period of time, whether short or extended with a log book, still requires supervision and training on the job to achieve acceptable competency levels."

In some cases, individuals and employers reported paying for training again in similar areas. The employer survey did not examine whether retraining practices were as a result of apparent gaps in the units of competency or site specific obligations such as those linked to safety legislation.

Clarity in communications about expectations of training outcomes and the purpose of HRWL to provide a basic threshold for high risk work practice, may assist employers and employees in assessing capability and determining site specific/job specific development of employee skills.

A lack of confidence or dissatisfaction with training outcomes may in some cases signal a disparity between industry requirements and the outcomes specified in the units of competency. Survey responses indicated support to include more time practicing the skills learnt either during and/or between units of competency where units include basic, intermediate and advanced levels including:

- 40% of employers felt that the skills required to obtain HRWLs only went part of the way to meeting the needs of their business;
- employers were not convinced that the HRWL holder is competent when confronted with a variety of situations;
- there is a low level of confidence in the competency of employees with both basic and those with advanced HRWLs, with only 4.1% of survey participants reporting they are extremely confident in the competency of those with a basic HRWL and only 12.2% reported being highly confident;

- a common concern underpinning the lack of confidence was the lack of practical experience required to get the HRWL;
- views indicate that if a person has a HRWL, then this should mean the person is competent to do the job; and
- almost 90% of employers commented that on the job experience should be mandated as part of the HRWL training requirements or before the HRWL can be issued.

There is currently nothing that prevents an RTO from incorporating a higher level of practical experience in HRWL courses however the units of competency do not require specific levels of practical experience.

Views about whether or not units of competency should include a practical experience component should be put forward formally as part of mechanisms that feed into the development of nationally endorsed training products.

Key Findings

- 40% of employers surveyed believe that there is too much emphasis on theory and not enough on practical experience in HRWL training.
- Employer expectations about the experience employees will gain from undertaking the HRWL training do not match the outcomes as specified in the HRWL units of competency.
- Employers are calling for more practical experience:
 - before learners are deemed competent in the HRWL units; and
 - in between progression from basic to intermediate to advanced levels of the units of competency.

5 RECOMMENDATIONS

Ongoing compliance

To maintain registration, RTOs are expected to demonstrate compliance with the national set of standards agreed by the Council of Australian Governments Industry and Skills Council (CISC) at all times. The Council's quality assurance activities, including its audit strategy, are aimed at ensuring that RTOs continue to maintain compliance with the standards.

The standards describe outcomes RTOs must achieve, but do not prescribe the methods by which they must achieve these outcomes. This non-prescriptive approach allows RTOs to be flexible and innovative in their VET delivery, and acknowledges that each RTO is different and needs to operate in a way that suits their clients and learners.

In an audit context VET regulatory processes require that RTOs are treated in accordance with natural justice and procedural fairness principles and therefore RTOs are provided with the opportunity to rectify non-compliance within specific timeframes. Monitoring audits are often undertaken following audits where significant or critical non-compliance is found, even though rectification evidence is judged to be adequate to assume that, once fully implemented, the RTO will be operating in compliance with the *Standards for RTOs*. This aligns with the risk-based approach to regulation.

It is recommended that RTOs delivering HRWL units be monitored to provide assurance that the rectifications have been fully implemented and RTOs continue to comply with the *Standards for RTOs*. Monitoring audits will focus on the highest areas of non-compliance identified during this SIA - assessment practices, amount of training and the ongoing professional development of trainers and assessors in VET knowledge and skills. The attendance of technical advisors at these audits will continue where possible.

Recommendations

- 1) The Council to undertake within 6 months monitoring audits of all RTOs continuing to deliver HRWL training that were found to have critical or significant levels of non-compliance. The audits to focus on non-compliances identified as part of the SIA findings and the implementation of rectification actions.
- 2) The Council to ensure that RTOs audited for units of competency that lead to HRWLs, including all new applications, be subject to a site audit, with industry advisors in attendance wherever possible. The outcome of the audits to be reviewed within 12 months to determine if monitoring is an ongoing requirement.
- 3) The Council, WorkSafe and Department of Mines and Petroleum to develop strategies for the capture and timely sharing of intelligence from industry. This information would be used to inform the Council's risk strategies.

Practical Experience and Assessment

The findings of this SIA highlighted that assessment practices were not being conducted in accordance with training package/unit of competency requirements, resulting in non-compliance against the standards. This may indicate a need for greater specification or clarification of assessment arrangements to be incorporated into the units of competency, including consideration to incorporating views expressed by employers and industry stakeholders for the inclusion of more practical experience, both within the unit of competency and as a pre-requisite prior to enrolment into intermediate and advanced units leading to the issuance of a high risk work licence.

Units of competency leading to the issuance of HRWLs require assessment to be undertaken using mandated NAIs. The mandated NAIs are endorsed by Safe Work Australia and must be used by registered HRWL assessors to assess a candidate's competency against the relevant unit of competency. RTOs are responsible for ensuring that any assessment instruments they use, regardless of the source, cover all requirements of the units of competency being assessed. Similarly, RTOs are responsible for ensuring that NAIs covers all requirements of the unit of competency being assessed. This means any identified gaps must be supplemented to address any identified gaps between the assessment instrument and the unit of competency requirements.

Over half of RTOs in the sample were found to be non-compliant with the assessment requirements across the standards with incorrect deployment of the NAIs by registered HRWL assessors being a common factor. Incorrect use of the NAIs contribute to poor assessment practices and record-keeping of assessment results. These findings may be able to inform future improvements to the NAIs to ensure they meet the assessment requirements of the HRWL units.

The findings of this SIA confirm the need to strengthen assessment practices in relation to the HRWL units. In addition to poor assessment and evidence-gathering practices and the inaccurate records of practical assessments, there was evidence of a lack of ongoing professional development in VET knowledge and skills of trainers and assessors.

It is strongly recommended that any assessment measures incorporated into the units of competency leading to the issuance of high risk work licences provide sufficient detail to enable RTOs and regulators to have a clear understanding of what is required to ensure assessment validity, sufficiency and currency, resulting in increased confidence by industry of licence holders.

Recommendations

- 4) The Training Accreditation Council to forward the outcomes of the SIA to the Australian Industry and Skills Committee (AISC) and the relevant National Industry Reference Committees highlighting concerns surrounding the assessment requirements, including:
 - a. the need to thoroughly review arrangements where assessment instruments are prepared by external bodies, and
 - b. relaying industry's position that more practical training and assessment should be mandated in the units of competency.
- 5) The Training Accreditation Council to raise with Safe Work Australia concerns identified during the SIA regarding the NAIs for consideration in the review and future development of the instruments.
- 6) The Training Accreditation Council and WorkSafe collaborate to refine and expand materials for registered HRWL assessors including requirements for the use of the national NAIs and general assessment requirements in the *Standards for RTOs*.

Information and education

Employer feedback indicated that not all employers fully understand the purpose of the training and licensing regime or understand the concept of 'competency' as it applies within the vocational education and training system. The outcomes of nationally recognised training and licenses that are issued on the basis of successful completion, are not intended to provide employers with an indication of the depth and breadth of experience the candidate has in application of the skill in the workplace.

Employers are calling for more practical experience before learners are deemed competent in the units of competency leading to the issuance of high risk work licences, and in between progression from basic to intermediate to advanced levels of the units. The SIA found that employer expectations about the breadth and depth of experience employees will gain from undertaking the HRWL training do not match the outcomes as specified in the units of competency. In some instances, the disparity has resulted in individuals and employers paying for retraining in similar areas. Employers could be supported to gain a more realistic understanding of what to expect from the training linked to the units of competency and the issuance of high risk work licences.

Recommendation

- 7) The Training Accreditation Council to request that the relevant Western Australian Training Councils liaise with WorkSafe on the development of a communication strategy that explains to employers the competency outcomes to be expected from HRWL training including the basic threshold for HRW licensing and employer responsibility for site and job specific development of employee skills.

Regulatory reforms

In January 2016, following agreement from CISC that further reform options should be developed to improve the quality of assessment, the Commonwealth Department of Education and Training released a paper entitled, *"Quality of assessment in vocational education and training – Discussion Paper"*. The paper states

"In dealing with assessment issues, the regulatory framework must strike a balance between the costs of regulation, both for RTOs and for the regulator, and the importance of ensuring that issued VET qualifications reflect a person's competencies as rigorously tested through robust assessment processes. An incompetent graduate that is deemed competent can have a negative impact on employers and the workplace, and could endanger an individual, the community or seriously affect public safety. Such flawed qualifications may also have a broader impact on public confidence in nationally accredited training and the reputation of Australia's VET sector" (p21).⁸

There is strong support from a range of stakeholders, including SIA Reference Group members that regulatory systems should be able to respond to poor performing RTOs more effectively, in particular in detecting and taking action against RTOs demonstrating inadequate assessment systems.

Recommendation

- 8) The Training Accreditation Council, together with other VET Regulators, explore options to reduce timeframes to remove non-compliant providers from the sector.

⁸ Quality of assessment in VET – Discussion Paper <https://docs.education.gov.au/node/39446>

6 APPENDICES

Appendix A	Audit Methodology
Appendix B	Reference Group membership
Appendix C	HRWL Units Linked to ISC and SSO
Appendix D	Registration and role of WorkSafe registered HRWL assessors
Appendix E	Standards for RTOs – Principles of Assessment and Rules of Evidence
Appendix F	Assessment of competency – Mines Safety and Inspection
Appendix G	Audit outcomes against the <i>Standards for RTOs</i>

7 ATTACHMENTS

Attachment 1	Categories of Non-Compliance
Attachment 2	<i>Standards for Registered Training Organisations (RTOs) 2015</i> Clauses and sub-clauses selected for audit
Attachment 3	<i>Australian Quality Training Framework Essential Conditions and Standards for Continuing Registration (AQTF)</i> Conditions and elements selected for audit
Attachment 4	Employer survey report

APPENDIX A: AUDIT METHODOLOGY

Audit process

The SIA process consisted of the following steps:

1. establish and convene Reference Group;
2. develop audit process and methodology and have endorsed by Reference Group;
3. identify all RTOs with relevant scope related to the SIA and confirm delivery;
4. finalise audit sample and methodology;
5. identify technical advisors and provide briefing information;
6. assign audits and conduct auditor briefing;
7. undertake audits of RTOs;
8. interview past students;
9. undertake survey of employers;
10. interview key stakeholders;
11. analyse reports from recently audited RTOs in the audit sample;
12. compile industry and strategic data/information;
13. draft audit report and distribute to reference group for comment;
14. present final audit report to Council for endorsement; and
15. distribute endorsed report to key stakeholders and publish.

The conduct of site audits for the SIA was in line with the Council's established audit process and the requirements of the audit handbook.

Parameters for the audit

The requirements established for the conduct of the audit were as follows:

- RTOs actively delivering training and assessment for high risk work licences in WA to be selected for the audit sample using a risk-based approach and have a site audit;
- recently audited RTOs to be excluded from the site audit sample and their recent audit outcomes against the *AQTF* included in the audit data for analysis;
- RTOs to be advised of the audit focus in line with TAC's established audit process;
- compliance with the *Standards for Registered Training Organisations (RTOs) 2015* to be recorded on the day of the site audit;
- technical advisors to accompany the auditor on all site audits, wherever possible;
- student records and assessments to be tracked during audit;
- input from students to be obtained as part of the audit process, interviewing past students rather than enrolled students, where possible, to capture their perspectives after they have applied their learning in the workplace;
- employer survey to be developed and conducted online with Reference Group members assisting with the promotion of the survey to their stakeholders;
- stakeholder interviews to be conducted to complement employer survey data;

- the Council's established system for recording and responding to compliance outcomes to be applied;
- auditors to provide additional comment on a range of issues relating to HRWL training and assessment in line with concerns raised by the Reference Group; and
- preparation of a report on the outcomes of the SIA.

Audit team briefing

A briefing for the Council's external panel of auditors was conducted and the purpose of the briefing was to:

- provide the background and overview of the SIA;
- provide an overview of high risk work licence issues raised by the Reference Group; and
- discuss the audit process, focus and specific requirements of the audit, including the role of technical advisors.

A student questionnaire, RTO trigger questions and auditor checklist were developed to ensure consistent information was obtained and recorded for each audit to enable meaningful analysis and comparison of audit findings and descriptive data to achieve the objectives of the SIA.

Due to the technical and complex nature of the units of competency related to high risk work licence classes it was agreed that technical advisors would participate in site audits of the RTOs and where possible view live training and/or assessment with the auditor. Technical advisors play a valuable role in the provision of specific advice on industry plant and equipment and licensing requirements. Due to the small number of nominated technical advisors individual briefings were provided by auditors. The purpose of the briefing was to:

- discuss the role of technical advisors at audit, including audit protocols, conflict of interest issues and confidentiality requirements; and
- discuss the process, focus and specific requirements of the audit.

RTO audit reporting tool

Auditors used the standard TAC template for reporting audit outcomes, through the online AuditorNet facility. The supplementary data and additional information requested by the Reference Group was included in the audit reports. The reports were analysed and informed the findings outlined in this report.

Conduct of audits

All site audits were conducted by members of the Council's external panel of auditors. Audits conducted in 2015 evaluated compliance against the *Standards for RTOs*, whereas audits conducted in the previous 12 to 18 months were against the requirements of the *AQTF*. The compliances and non-compliances identified in this report are based on the outcomes determined at the site audits. It is

important to note that to maintain registration under the *AQTF* and the *Standards for RTOs* RTOs must be fully compliant with the standards at all times.

The Council's processes allow for RTOs that are found non-compliant at audit against the standards to provide additional evidence within a specified timeframe, generally 20 working days after receipt of the audit report, in order to demonstrate compliance.

In some instances provision of additional evidence is sufficient to demonstrate compliance with the standards; however where non-compliances remain, the matter is referred to the Council for further consideration and action.

Data gathering approaches

Data gathering approaches for the SIA included an employer survey; structured student interviews; key stakeholder interviews; analysis of recently audited RTO audit reports; targeted RTO site audits plus interviews for RTO perspectives on HRWL training and assessment; and involvement of technical advisors in site audits and the observation of practical training and/or assessment.

Employer survey

An employer survey was developed and conducted to seek feedback on employer satisfaction with the training provided for HRWLs. The survey sought information on:

- how satisfied employers were;
- employer opinion on the ability of recently trained HRW licence holders to meet industry requirements;
- employer confidence in the training and assessment as an indicator that a person should get their HRWL; and
- general comments on the experience or perceptions as employers of licensed HRW staff/contractors.

The survey was administered through the use of an online survey tool. The invitation to participate in the survey was sent to employers via Reference Group members who assisted in the promotion of the survey to its wider stakeholder group.

A copy of the survey questionnaire is in Appendix 3.

A total of 150 responses were received from employers, although not all participants responded to every question. Throughout the survey report, the total number of respondents is indicated for each survey question. Responses were analysed and included in a survey report with key outcomes and issues included in the body of this report.

A copy of the Employer Survey Report is provided at Attachment 4.

Student interviews

A structured questionnaire targeted at past students was developed to capture student perspectives on HRWL training. A small number of past students were interviewed by auditors using some or all of the structured questions with additional feedback provided by six groups of onsite students. In all, over 50 students contributed their views on past or current training.

Stakeholder interviews

Nine unstructured interviews were conducted with Reference Group stakeholders and a number of technical advisors to discuss industry views on issues related to HRW licensing and training with discussion centred on the focus areas of the audit.

Additional anecdotal information collected from the interviews added weight to views supporting a focus on the amount of training and assessment practices being provided by RTOs, including correct use of the NAIs. Additionally, a number of stakeholders raised the issue of onsite practical experience needing to be a requirement for HRW licensing.

APPENDIX B: REFERENCE GROUP MEMBERSHIP

The role of the Reference Group for the Strategic Industry Audit of RTOs delivering high risk work licence training in Western Australia was to:

- provide input into the scope and audit approach;
- provide advice on industry issues and trends relating to high risk work licences;
- provide advice, direction and support for the SIA process;
- assist in identifying technical advisors to attend RTO audits and provide assistance to auditors;
- provide input into the employer survey and facilitate its distribution through industry networks; and
- provide comment on, and endorse, the recommendations of the final report.

Membership

Construction Training Council

Alan Davis

Director, Skills Development

Department of Mines and Petroleum

Dr Neil Woodward

A/Director Mines Safety, Resources Safety Division

Housing Industry Association

John Gelavis

Regional Executive Director - Western Australia

Master Builders Western Australia

Neil Du Rand

Training Director

Resources Industry Training Council

Tony Noonan

Board member

Rio Tinto

Nigel Haywood

Manager

Marcus Emmerton

Training and Delivery Superintendent

Woodside Energy

John Weaver

Superintendent - Learning Management

WorkSafe

(Department of Commerce)

Stephen Kidd

Production Learning and Development Manager

Bill Mitchell

A/Executive Director

Australian Skills Quality Authority

Kavita Dayal

Manager, Industry Engagement

Training Accreditation Council Secretariat

(Department of Education Services)

Stephanie Trestrail

Director Training Regulation

Morena Stanley

A/Manager Regulation (VET Compliance)

Angela Hollingsworth

Senior Regulation Officer (VET Policy)

Kane Depiazz

A/Senior Regulation Officer (VET Policy)

Cherrie Hawke

Consultant

APPENDIX C: HRWL UNITS LINKED TO ISC AND SSO

UNIT OF COMPETENCY	LICENCE	INDUSTRY SKILLS COUNCIL ⁹	SERVICE SKILLS ORGANISATION ¹⁰
CPCCLDG3001A Licence to perform dogging CPCCLRG3001A Licence to perform rigging basic level CPCCLRG3002A Licence to perform rigging intermediate level CPCCLRG4001A Licence to perform rigging advanced level CPCCLSF2001A Licence to erect, alter and dismantle scaffolding basic level CPCCLSF3001A Licence to erect, alter and dismantle scaffolding intermediate level CPCCLSF4001A Licence to erect, alter and dismantle scaffolding advanced level CPCCLHS3001A Licence to operate a personnel and materials hoist CPCCLHS3002A Licence to operate a materials hoist CPCCLBM3001 Licence to operate a concrete placing boom CPCCLTC4001A Licence to operate a tower crane CPCCLTC4002A Licence to operate a self-erecting tower crane	DG RB RI RA SB SI SA HP HM PB CT CS	Construction and Property Services Industry Skills Council (CPSISC)	Artibus Innovation
UEOPL001A Licence to operate a steam turbine UEOPL002A Licence to operate a reciprocating steam engine	TO ES	Energy Skills Australia (EE-Oz)	Australian Industry Standards Limited
MSMBLIC001 Licence to operate a standard boiler MSMBLIC002 Licence to operate an advanced boiler	BB BA	Manufacturing Skills Australia (MSA)	Manufacturing Skills Australia (MSA)
TLILIC0012A Licence to operate a vehicle loading crane (capacity 10 metre tonnes and above) TLILIC2001A Licence to operate forklift truck TLILIC2002A Licence to operate an order picking forklift truck TLILIC2005A Licence to operate a boom-type elevating work platform (boom length 11 metres or more) TLILIC3003A Licence to operate a bridge and gantry crane TLILIC3004A Licence to operate derrick crane TLILIC3006A Licence to operate a non-slewing mobile crane (greater than 3 tonnes capacity) TLILIC3007A Licence to operate a portal boom crane TLILIC3008A Licence to operate a slewing mobile crane (up to 20 tonnes) TLILIC3019A Licence to operate a reach stacker (greater than 3 tonnes capacity) TLILIC4009A Licence to operate a slewing mobile crane (up to 60 tonnes) TLILIC4010A Licence to operate a slewing mobile crane (up to 100 tonnes) TLILIC4011A Licence to operate a slewing mobile crane (up over 100 tonnes)	CV LF LO WP CB CD CN CP C2 - C6 C1 CO	Transport and Logistics Industry Skills Council (TLISC)	Australian Industry Standards Limited

⁹ <http://www.safeworkaustralia.gov.au/sites/swa/whs-information/licensing/pages/industry-skills-council-contact-units-competency>

¹⁰ <https://docs.education.gov.au/node/39421>

APPENDIX D: REGISTRATION AND ROLE OF WORKSAFE REGISTERED HRWL ASSESSORS¹¹

Persons wishing to obtain an HRWL must be assessed by a WorkSafe registered HRWL assessor for the class of HRWL required. The assessment is conducted using an approved national assessment instrument for the particular class of HRWL. The Notice of Assessment, Statement of Attainment issued by an RTO and other application documents are submitted to WorkSafe to obtain an HRWL.

Assessor registration

A person wishing to become an HRWL assessor must meet certain criteria including:

- Hold an HRWL for the class they wish to be registered;
- Have extensive and recent operating experience in that class of HRWL, as a senior operator or supervisor;
- Have completed a Certificate IV in Training and Assessment;
- Demonstrate a sound knowledge of occupational safety and health legislation and Australian Standards as they relate to the HRWL class they seek registration for;
- Successfully pass a written examination and interview conducted by WorkSafe; and
- Police clearance.

An applicant for registration as an HRWL assessor may apply for more than one class of HRWL providing they meet the above criteria for each class.

Registered Training Organisation (RTO)

An HRWL Assessor must be aligned to an RTO. Some registered HRWL assessors are themselves an RTO. This national qualification is administered by the Training and Accreditation Council in the Education system.

The RTO must be scoped to train in the class of HRWL held by the registered HRWL assessor. The registered HRWL assessor may be aligned to more than one RTO.

Auditing of Registered HRWL Assessors

Registered HRWL assessors are subject to auditing by a WorkSafe audit and compliance investigator, at least once in the registration cycle (3 years). The audit is to ensure that the assessor is complying with the conditions of their registration including:

- Sighting photographic documentary evidence of the applicants identity and age;
- The applicant is enrolled with an RTO for training in the HRWL class;

¹¹ <https://www.commerce.wa.gov.au/publications/information-registration-and-role-high-risk-work-licence-hrwl-assessors>

- Written examination papers are available for audit to ensure compliance with the relevant assessment instrument;
- Notices of assessment are completed in accordance with the directives listed in the assessment book; and
- Assessments are only carried out for HRWL classes that the assessor is registered for.

Status of registered HRWL assessors

WorkSafe registered HRWL assessors conduct Vocational Education and Training assessments on behalf of WorkSafe that results in the issuing of a Notice of Assessment. This is the only document issued by the HRWL assessor, required for the OSH regulations to issue a HRWL. However, the OSH regulations also require that a Statement of Attainment issued by an RTO is included in an application before the WorkSafe Western Australia Commissioner can issue an HRWL.

Registered HRWL assessors as public officers

Because registered HRWL assessors are registered to perform a legislative function, they are deemed to be a public officer. A registered HRWL assessor is expected to operate within the limits of the Public Service codes of conduct and code of ethics.

There is an expectation that the assessor will correctly mark assessment papers with fairness and equity. If an applicant fails an assessment they are required to receive further training and undergo re-assessment.

Accepting or seeking bribes or any other inducement to ensure that a candidate passes a HRWL assessment is prohibited.

The candidate provides personal information about themselves to prove age and identity. Copies of these documents must be retained securely and not disclosed.

Penalties available for breaches of HRWL conditions

There are a number of compliance options if registered HRWL assessors act inconsistent with the requirements of the OSH regulations. Depending on the nature and seriousness, assessors may be instructed to correct practices. Should the conduct continue or be serious, suspension for a period of time, cancellation or prosecution could occur. If any fraud is identified, WorkSafe is required to refer the matter to the Public Sector Commission or Corruption and Crime Commission with potential for criminal proceedings.

Registration as an assessor is governed by the requirements in:

Occupational Safety and Health Regulations 1996 – Part 6, Division 3 – Registration as an assessor.

APPENDIX E: STANDARDS FOR RTOS - PRINCIPLES OF ASSESSMENT AND RULES OF EVIDENCE EXTRACT

Principles of Assessment

Fairness	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.</p>
Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none"> • reflecting the learner's needs; • assessing competencies held by the learner no matter how or where they have been acquired; and • drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none"> • assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance; • assessment of knowledge and skills is integrated with their practical application; • assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and • judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>

Rules of Evidence

Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

APPENDIX F: ASSESSMENT OF COMPETENCY – MINES SAFETY AND INSPECTION

Mines Safety and Inspection Regulations 1995¹²

Reg. 4.13: Induction and training of employees

- (1) Each responsible person at a mine must ensure that every employee is —
- (a) given adequate instruction and training in safety procedures and systems of work and in the tasks required of the employee; and
 - b) assessed before commencing work at the mine to ensure that the employee is competent to perform the tasks he or she will be assigned and to operate any plant and equipment the employee will be required to operate; and
 - c) retrained and reassessed whenever systems of work or plant and equipment are changed, or new systems of work or plant and equipment are introduced.
- (2) Each responsible person at a mine must ensure that —
- a) a record is made of any instruction, training, retraining, assessment or reassessment given as required under this regulation; and
 - b) the record is kept for a minimum of 2 years after it is made.

Reg. 6.37(1)(a) A person must not do high risk work of a particular class at a mine unless the person holds a high risk work licence for that class of work.

High risk work and high risk work licences have the meaning given in the Occupational Safety and Health Regulations 1996 regulation 6.1.

¹²

[http://www.slp.wa.gov.au/pco/prod/FileStore.nsf/Documents/MRDocument:27726P/\\$FILE/Mines%20Safety%20and%20Inspection%20Regulations%201995%20-%2006-b0-011.pdf?OpenElement](http://www.slp.wa.gov.au/pco/prod/FileStore.nsf/Documents/MRDocument:27726P/$FILE/Mines%20Safety%20and%20Inspection%20Regulations%201995%20-%2006-b0-011.pdf?OpenElement)

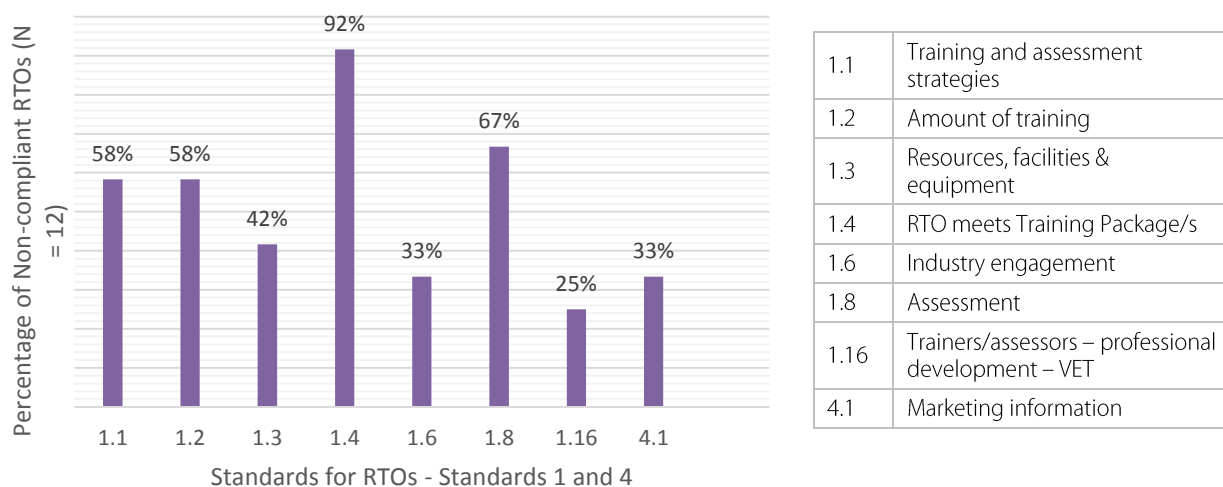
APPENDIX G: AUDIT OUTCOMES AGAINST THE *STANDARDS FOR RTOS* 2015 AND THE AQTF

12 RTOs audited against the *Standards for RTOs*

Table 3: Summary of RTO compliance against the *Standards for RTOs* N = 12)

CLAUSE	FOCUS OF CLAUSE	NUMBER COMPLIANT RTOS	NUMBER NON-COMPLIANT RTOS	NUMBER RTOS NOT AUDITED
1.1	Strategies	5	7	
1.2a	Amount of training	5	7	
1.2b	Amount of training	6	6	
1.3a	Sufficient trainers/assessors	12	0	
1.3b	Support services	10	2	
1.3c	Learning resources	9	3	
1.3d	Facilities & equipment	8	4	
1.4	Meets Training Package (TP)	1	11	
1.5	Industry engagement (IE)	11	1	
1.6a	IE strategies, practices, resources	9	3	
1.6b	IE trainer/assessor industry skills	8	4	
1.8a	Assessment meets TP	4	8	
1.8b	Principles of assessment & rules of evidence	4	8	
1.13a	Vocational competencies	12	0	
1.13b	Current industry skills	11	1	
1.13c	VET knowledge & skills	10	2	
1.14a	TAE40110 Certificate IV in Training and Assessment	11	1	
1.15a	Assessment only	3	0	9
1.16	Professional development	9	3	
1.18	Supervised trainers	0	0	12
2.3	Third party agreement	1	0	11
2.4	Third party monitoring	1	0	11
3.1	Issuance of certificates	12	0	
4.1	Marketing information	8	4	
5.2	Information prior to enrolment	10	2	
8.3a	Third party cooperation	1	0	11
8.3b	Notify third party agreements	1	0	11

Figure 14: Clauses with three or more non-compliances



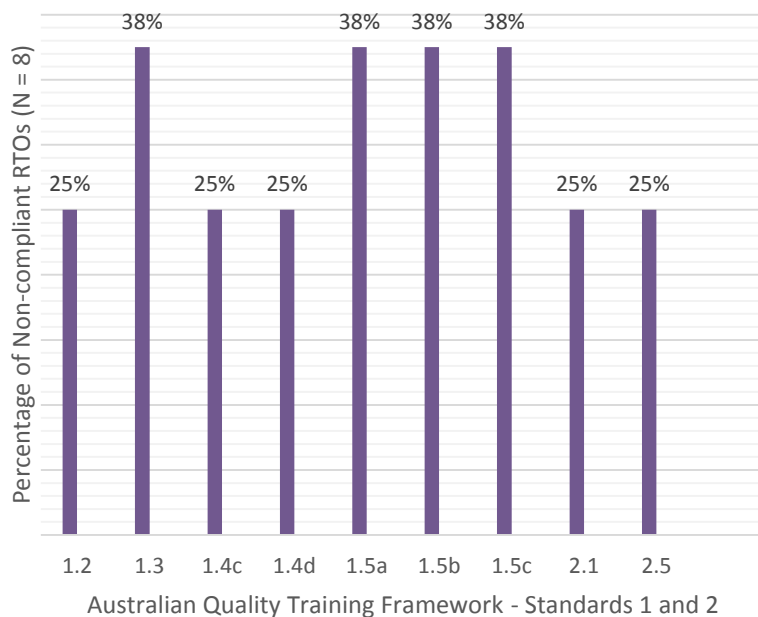
1.1	Training and assessment strategies
1.2	Amount of training
1.3	Resources, facilities & equipment
1.4	RTO meets Training Package/s
1.6	Industry engagement
1.8	Assessment
1.16	Trainers/assessors – professional development – VET
4.1	Marketing information

Eight RTOs audited against the Australian Quality Training Framework

Table 4: Summary of RTO compliance against the AQTF (N=8)

ELEMENT	FOCUS OF ELEMENT	NUMBER COMPLIANT RTOS	NUMBER NON-COMPLIANT RTOS	RTOS NOT AUDITED
1.2	Training and assessment strategies	6	2	
1.3	Resources, facilities and equipment	5	3	
1.4a	TAE40110 Certificate IV in Training and Assessment	8	0	
1.4b	Vocational competencies	7	1	
1.4c	Current industry skills	6	2	
1.4d	Professional development	6	2	
1.5a	Assessment meets Training Package	5	3	
1.5b	Assessment meets principles of assessment & rules of evidence	5	3	
1.5c	Assessment meets workplace and regulatory requirements	5	3	
2.1	Establish and meet client needs	6	2	
2.3	Information prior to enrolment	8	0	
2.5	Training, assessment and support services meet individual needs	6	2	
3.3	Third party agreements	0	0	8
C6	Issuance of certificates	7	1	
C8	Marketing	7	1	

Figure 15: Elements with two or more non-compliances



1.2	Training and assessment strategies
1.3	Resources, facilities & equipment
1.4c	Trainers/assessors – Current industry skills
1.4d	Trainers/assessors – Professional development
1.5a	Assessment meets Training Package
1.5b	Assessment meets principles of assessment & rules of evidence
1.5c	Assessment meets workplace and regulatory requirements
2.1	Establish and meet client need
2.5	Services meet learner needs

ATTACHMENT 1: CATEGORIES OF NON-COMPLIANCE

- In line with the *National Guideline for Managing Non-Compliance*

Non-compliance

The requirements of the *Standards for Registered Training Organisations 2015* have not been met based on the evidence reviewed. There are three categories of non-compliance.

Minor non-compliance

The requirements of the *Standards for Registered Training Organisations 2015* have not been met based on the evidence reviewed but there is no or minor adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace.

Evidence indicates that:

- non-compliance does not demonstrate a serious breakdown of the RTO's systems for the provision of quality training and assessment;
- continuous improvement systems are in place; and
- data from the quality indicators or other sources shows that clients are generally satisfied with services and outcomes from the RTO.

Significant non-compliance

The requirements of the *Standards for Registered Training Organisations 2015* have not been met based on the evidence reviewed and there are indications of a significant adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace.

Evidence indicates that:

- training and assessment systems are not sufficiently focused on quality training and assessment outcomes and meeting individual learners' needs in some areas of the RTO's operations;
- systems to continuously improve the RTO's operations are inadequate;
- data from the quality indicators or other sources shows that a range of clients have expressed dissatisfaction with services and outcomes from the RTO; and
- previously identified minor non-compliance has not been rectified or evidence of improvement within the applicable period has not been provided.

Critical non-compliance

The requirements of the *Standards for Registered Training Organisations 2015* have not been met based on the evidence reviewed and a critical adverse impact on learners and/or consumers of goods and services produced in the training environment or the current (or future) workplace is occurring or has occurred.

Evidence indicates that:

- training and assessment systems are not achieving quality training and assessment outcomes and are not meeting individual learners' needs;
- there is a breakdown in, or absence of, effective management systems;
- there is no systematic approach to continuous improvement; and

- data from quality indicators or other sources shows that there is widespread or persistent dissatisfaction with services and outcomes.

In extreme situations evidence from audit may indicate risk of injury or death to people in the training environment or the current (or future) workplace. In such instances, the level of risk and potential impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace warrants immediate rectification.

ATTACHMENT 2: STANDARDS FOR REGISTERED TRAINING ORGANISATIONS (RTOS) 2015

– clauses and sub-clauses selected for reporting

Standard	The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of Training Packages and VET accredited courses.
1.1	The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of Training Packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.
1.2	For the purposes of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to: <ul style="list-style-type: none"> a) the existing skills, knowledge and the experience of the learner; b) the mode of delivery
1.3	The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient: <ul style="list-style-type: none"> a) trainers and assessors to deliver the training and assessment; b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment; c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.
1.4	The RTO meets all requirements specified in the relevant Training Package or VET accredited course.
1.5	The RTO's training and assessment practices are relevant to the needs of industry and informed by industry engagement.
1.6	The RTO implements a range of strategies for industry engagement and systematically uses the outcome of that industry engagement to ensure the industry relevance of: <ul style="list-style-type: none"> a) its training and assessment strategies, practices and resources; and b) the current industry skills of its trainers and assessors.
1.8	The RTO implements an assessment system that ensures that assessment (including recognition of prior learning): <ul style="list-style-type: none"> a) complies with the assessment requirements of the relevant Training Package or VET accredited course; and b) is conducted in accordance with the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2 [of the <i>Standards for Registered Training Organisations (RTOS) 2015</i>].
1.13	In addition to the requirements specified in Clause 1.14 and Clause 1.15, the RTO's training and assessment is delivered only by persons who have: <ul style="list-style-type: none"> a) vocational competencies at least to the level being delivered and assessed; b) current industry skills directly relevant to the training and assessment being provided; and c) current knowledge and skills in vocational training and learning that informs their training and assessment. <p>Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.</p>
1.14	The RTO's training and assessment is delivered only by persons who have: <ul style="list-style-type: none"> a) prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1, or demonstrated equivalence of competencies; and b) from 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1. [Item 1: TAE40110 Certificate IV in Training and Assessment or its successor; Item 2: a Diploma or higher level qualification in adult education]
1.15	Where a person conducts assessment only, the RTO ensures that the person has: <ul style="list-style-type: none"> a) prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1, or demonstrated equivalence of competencies; and b) from 1 January 2016, Item 1 or Item 2 or Item 3 of Schedule 1. [Item 3: TAESS00001 Assessor Skill Set or its successor]
1.16	The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

1.18	<p>The RTO ensures that any individual working under the supervision of a trainer under Clause 1.17:</p> <ul style="list-style-type: none"> a) holds the skill set defined in Item 4 of Schedule 1 or, prior to 1 January 2016, is able to demonstrate equivalence of competencies; b) has vocational competencies at least to the level being delivered and assessed; and c) has current industry skills directly relevant to the training and assessment being provided. <p>[Item 4: TAESS00007 Enterprise Trainer – Presenting Skill Set or its successor; or TAESS00008 Enterprise Trainer – Mentoring Skill Set or its successor; or TAESS00003 - Enterprise Trainer and Assessor Skill Set or its successor]</p>
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Standard 2	The operations of the RTO are quality assured.
2.3	The RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.
2.4	The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and uses these to ensure that the services delivered comply with these Standards at all times.

Standard 3	The RTO issues, maintains and accepts AQF certification documentation in accordance with these Standards and provides access to learner records.
3.1	The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant Training Package or VET accredited course.

Standard 4	Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients.
4.1	<p>Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:</p> <ul style="list-style-type: none"> a) accurately represents the services it provides and the training products on its scope of registration; b) includes its RTO Code; c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained; d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4; e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf; f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party; g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO; h) includes the code and title of any training product, as published on the National Register, referred to in that information; i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration; j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised; k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and l) does not guarantee that: <ul style="list-style-type: none"> i) a learner will successfully complete a training product on its scope of registration; or ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

Standard 5	Each learner is properly informed and protected.
5.2	<p>Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:</p> <ul style="list-style-type: none"> a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register; b) the training and assessment, and related educational and support services the RTO will provide to the learner including the: <ul style="list-style-type: none"> i) estimated duration; ii) expected locations at which it will be provided; iii) expected modes of delivery; iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and v) any work placement arrangements. c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation. d) the learner's rights, including: <ul style="list-style-type: none"> i) details of the RTO's complaints and appeals process required by Standard 6; and ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in; e) the learner's obligations: <ul style="list-style-type: none"> i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services; ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and iii) any materials and equipment that the learner must provide; and f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

Standard 8	The RTO cooperates with the VET Regulator and is legally compliant at all times.
8.3	<p>The RTO notifies the Regulator:</p> <ul style="list-style-type: none"> a) of any written agreement entered into under Clause 0 for the delivery of services on its behalf within 30 calendar days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and b) within 30 calendar days of the agreement coming to an end.

ATTACHMENT 3: AQTF ESSENTIAL CONDITIONS AND STANDARDS FOR CONTINUING REGISTRATION

– Conditions and Elements of the Standards selected for audit

Conditions	
Condition 6	Certification & Issuing of Qualifications & Statements of Attainment
Condition 8	Accuracy and Integrity of Marketing
Standards	
Standard 1	The RTO provides quality training and assessment across all of its operations
1.2	Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.
1.3	Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.
1.4	Training and assessment is delivered by trainers and assessors who: <ul style="list-style-type: none"> (a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and (b) have the relevant vocational competencies at least to the level being delivered or assessed, and (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and (d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.
1.5	Assessment including Recognition of Prior Learning (RPL): <ul style="list-style-type: none"> (a) meets the requirements of the relevant Training Package or accredited course (b) is conducted in accordance with the principles of assessment and the rules of evidence (c) meets workplace and, where relevant, regulatory requirements

Standard 2	The RTO adheres to principles of access and equity and maximises outcomes for its clients.
2.1	The RTO establishes the needs of clients, and delivers services to meet these needs.
2.3	Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.
2.5	Learners receive training, assessment and support services to meet their individual needs.

Standard 3	Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the RTO operates.
3.3	The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.

ATTACHMENT 4: EMPLOYER SURVEY REPORT

The high risk work licence employer study is attached here.



High Risk Work Licence Employer Study

Prepared For:

The Training Accreditation Council

January 2016

Research Solutions Pty Ltd ABN 16083 581 766
24/60 Royal Street, East Perth, Western Australia 6004
PO Box 382 North Perth, WA 6906
Telephone (08) 9225 7772 Fax (08) 9225 7773
www.researchsolutions.com.au

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1.0 KEY FINDINGS

A High Risk Work Licence (HRWL) is an essential qualification for the safety of employees and contractors carrying out work in high risk areas such as rigging, scaffolding, crane operations and dogging in the construction, resources, transport and logistics industries.

The Training Accreditation Council (TAC) commissioned a survey of businesses who employ HRWL holders to gain an understanding of the employer's perspective on HRWL training and to identify areas for improvement.

The survey participants indicated that the majority of them paid for the cost of HRWL training and almost all provided paid training leave for employees and contractors to receive training. The most important and most widely mentioned issues in selecting an RTO for HRWLs were:

- The reputation of the RTO for doing a thorough job of training.
- The ability to offer training when it was required.

Cost was an issue in selecting an RTO with 70% of employers listing it as important; however, just over 30% listed low cost as very important in their selection criteria.

Keeping the course short was of less importance with about 50% of employers listing it as important and only 32.8% listing it as very important; keeping the course short was of more importance to small/medium size companies than large companies. Generally the RTO set the length of the course, though in a few instances (14.5%) the employer and the RTO would negotiate this. In less than 10% of cases the employers indicated that they specified the length of the course.

In all 63.8% of employers rated their satisfaction with the HRWL training delivered in the survey as 8 out of 10 or higher, 15.5% scored it 6 or 7 out of 10 and 20.9% scored it 5 out of 10 or lower.

The survey indicates that there is a perceived lack of consistency between RTOs in delivering the training outcomes. Only half the survey participants felt that HRWL training course attendees from the different RTOs graduate with similar levels of skills and competency. **There is also perceived to be a lack of consistency in training outcomes between licence types.** Fewer than half the survey participants find HRWL training course attendees training for different licence types graduate with similar levels of skills and competency. Those who reported inconsistencies were the least satisfied with HRWL training.

The survey indicated that about 40% of employers felt that the skills required to obtain HRWLs only went part way to meeting the needs of their business. The main area where needs are not being met relates to the level of experience delivered, the main concern being that there is too much emphasis placed on "book learning" rather than hands on experience in a variety of circumstances. The comments made by employers in the survey indicated that the employers:

- Are not convinced that the HRWL holder is competent when confronted with a wide variety of situations; and
- The licence holder believes that because they have the licence they are able to do the job without further hands on experience.

Employer confidence in the competency of employees with both basic and those with advanced HRWLs is 4.1% of survey participants rating their level of confidence in the competency of those with a basic HRWL as 10/10 and 12.2% rated their confidence as 9 or 10/10. The figures are only marginally better for the advanced HRWLs – 8.1% of survey participants rating the competency of employees and contractors with an advanced HRWL as 10/10 and 19.9% as 9 or 10/10.

A common concern underscoring these figures is expressed as **the lack of practical experience required by the HRWL**. Survey participants indicate that employees are able to gain their basic licences with no practical experience and that employees are able to progress from basic to intermediate to advanced licences, and be awarded them, without stepping on site.

“People must gain experience at the basic level before advancing further. It is absurd that someone can hold an advanced rigging ticket and never been on a job.”

Employers note that the lack of practical experience also means that trainees do not have the opportunity to consolidate their learning and are not exposed to the variety of real life scenarios they must deal with on the job, yet the HRWL certifies that they are competent to do the job.

In addition employers report that course attendees are often told that they are qualified and work ready to perform high risk work once they have their licence without practical experience.

The comments made by employers indicate that many employers who hire employees with an HRWL expect them to have been taught the practical skills of rigging or scaffolding as part of the HRWL course over and above the safety issues. The request for on the job experience (one suggestion was a signed off log book) as part of the HRWL requirements or before the HRWL can be issued was made by almost 90% of employers, with 64.7% saying it should definitely occur. It was felt that this approach should ensure that:

- The employee has relevant work experience under a competent professional.
- The employee can do the job consistently.
- The employee has faced a variety of risk situations that might be encountered on the job.

Other improvements suggested by employers were:

- A review of the course content to ensure that a core set of skills are taught by each RTO which are fit for purpose.
- A mandated minimum time period between completing qualifications during which candidates needed to work in the occupation.
- A review of the quality and consistency of the RTOs, trainers and assessors, both in:
 - The ability to teach the subject.
 - Their competency and the currency of their knowledge.
- TAC should have the legal authority to enforce its audits and suspend or shut down RTOs that are non-conforming.
- Verification of Competency should be undertaken independently of the RTO doing the training.

2.0 BACKGROUND

The Training Accreditation Council (TAC) licences and regulates VET training organisations who provide training services only in Western Australia. It regulates about 320 organisations.

On occasion TAC undertakes a strategic industry audit and in the second half of 2015 TAC is in the process of auditing the training for High Risk Work Licences (HRWL). Research Solutions was approached to survey employers who employed staff required to hold HRWLs to gather the employer perspective of the training provided for HRWLs.

2.1 The Objectives

The survey addressed the following issues:

- The employer's involvement in organising the training for a HRWL.
- The selection of the HRWL RTO.
- Satisfaction with the RTOs providing HRWL training.
- The appropriateness of the HRWL training.
- Confidence in the standard of HRWL training.
- Verification of competency.
- Areas for improvement.

The results of the survey are detailed in the following pages of this report.

2.2 Method

The TAC provided Research Solutions with a briefing and a list of draft questions for the survey. These questions were then framed into a questionnaire by the Research Solutions' team following discussions with the industry stakeholders. The questionnaire was distributed by TAC to its stakeholder committee for comment, following this it was redrafted to take into account the comments from industry and programmed into an online survey. The survey was then reviewed by TAC along with a covering email ready for distribution. Due to privacy limitations, TAC provided the covering email and a common link to the questionnaire to four organisations who have contact with HRWL employers. These organisations were:

- Department of Mines and Petroleum
- Master Builders Western Australia
- Construction Training Council
- Resource Industry Training Council

Following an initial email, two reminder emails were sent at weekly intervals encouraging participation in the survey; the survey period was from mid November to 10 December 2015.

A final sample of 150 employers responded to the survey. This is a convenience sample as it is not known if all employers of people with HRWL received this survey, nor if all relevant staff within an organisation were reached. However, the results of the survey are consistent in most areas and similar across all groups of employers and hence are deemed to be fairly reliable.

3.0 THE LOGISTICS OF HRWL TRAINING

Just over 60% survey participants required their employees and contractors to hold HRWLs prior to being employed. The majority refer existing employees and contractors for training to obtain HRWLs, and just over 60% employers paid for the cost of training.

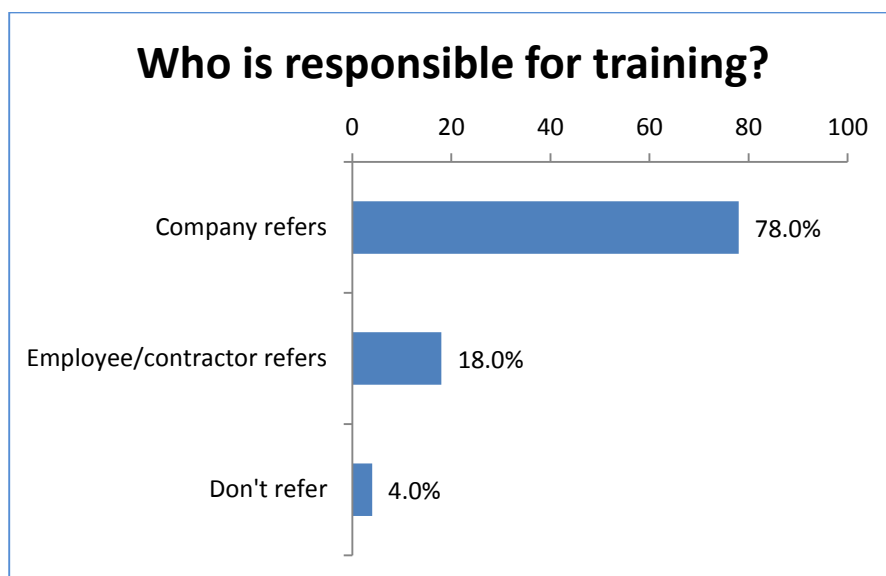
Almost 95% of employers provide paid training leave for employees and contractors to receive training, with the amount of time typically linked to the length of the course, as specified by the RTO.

3.1 The Requirement

60.7% of survey participants require their employees and contractors to hold HRWLs prior to being employed.

This was particularly the case for businesses requiring Intermediate and Advanced Rigging HRWLs, Intermediate and Advances Scaffolding HRWLs, and Slewing Mobile Crane HRWLs, here more than 70% of those businesses where these HRWLs were relevant required the licence prior to employment.

The majority of companies (78.0%) refer existing employees and contractors for training to obtain HRWLs. 18.0% place the responsibility for obtaining this training on their employees and contractors. The remaining 4.0% don't refer them for training.



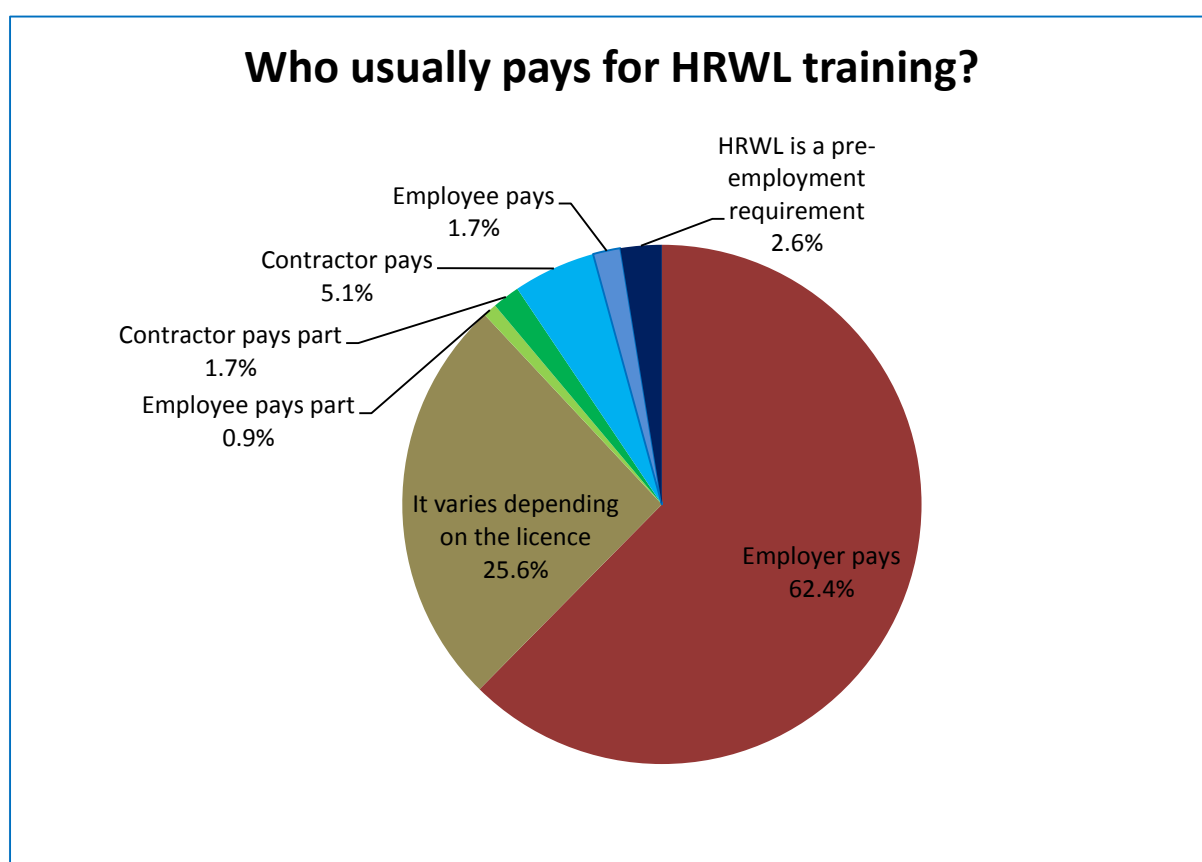
Q.6b. Do you refer existing employees/contractors for training to obtain HRWLs? n=150

3.2 Who Pays

As shown in the figure below, 62.4% of survey participants pay the full cost of training for their employees or contractors.

For 9.4%, the cost is paid for by the employee or contractor, with a HRWL being a pre-employment requirement for 2.6% of those (the remaining 6.8% must pay for their training after commencing employment).

For the remainder of the survey participants, 25.6% indicated that who pays varies depending on the licence, and 2.6% share the responsibility with the employee or contractor making a contribution to the cost of training.



Q.7. Who usually pays for the training of an employee or contractor in your business? (n=117; 33 do not refer existing employees / contractors for training to obtain HRWLs). n=150

3.3 Time Off

94.1% of survey participants provide paid time off for their employees and contractors to receive their training; 5.9% require them to take leave without pay.

3.4 Training Time

In 66.4% of cases, the time allowed for the training for each licence for each employee is determined by the RTO specifying the length of the course.

Who determines the training time / course length	%
The RTO specifies the length of the course	66.4%
Employer and RTO negotiate the length of the course together	14.5%
Award/agreements/industrial arrangements	9.1%
The employer specifies the length of the course	7.3%
Time allowed for training is dependent on the work schedule on site	2.7%
Other (type in)	0.0%

Q.9. How is the time allowed for the training of each licence for each employee determined? (n=110; 7 did not answer; 33 do not refer existing employees / contractors for training to obtain HRWLs)

4.0 THE SELECTION OF AN RTO

The majority of companies use multiple RTOs to meet their HRWL training needs. In choosing these RTOs, reputation and the timing of the course are the most important factors. Whilst not specifically measured, a consistent theme throughout the survey is the importance of the competence, experience and professionalism of the trainers and the requirement for proper training and assessment. These are also important factors in choosing RTOs.

There is definitely a level of consultation, customisation and flexibility in course content and delivery, although this doesn't occur on all occasions and for all client organisations.

In all 76.1% of survey participants use multiple RTOs to provide the training that leads to HRWLs. This is true of all types of HRWL.

4.1 What's Important in Choosing an RTO

The most important factors in selecting an RTO are reputation for doing a thorough job of training and the ability to offer the training when the company requires it. These are significantly more important than any other factor. Of the two, reputation is more "critically important".

The next most important factors are a good record in getting the employees licensed, cost and the ability to deliver on site.

Important Factors in Choosing an RTO	Critically important (10/10)	Very important (9+/10)	Overall importance (6+ / 10)
A reputation for doing a thorough job of the training	62.6%	75.7%	94.8%
The ability to offer the training I require when I need it	47.0%	65.8%	95.7%
A good record of getting the employees licensed	38.7%	45.9%	70.3%
A low cost	22.4%	32.8%	69.8%
The ability to deliver training at my site	18.3%	27.0%	64.3%
Keeping the courses short	16.2%	20.7%	51.4%
Running courses out of hours like weekends	6.7%	7.7%	33.7%
Online courses	5.9%	9.8%	33.3%

Q.11. How important are the following factors in selecting your RTO? Please score each of the following factors out of 10 where 1 is not at all important and 10 is critically important. (n=102-117; 0-15 don't know; 33 do not refer existing employees / contractors for training to obtain HRWLs)

There were little differences between companies in terms of which factors were important. Keeping the course short was less important for large companies (only 32.7% of survey participants from large companies rated this as important overall).

Survey participants also nominated a number of other factors they considered important in selecting an RTO, the more popular of which should be included in future surveys. These are:

- The quality, competence, industry experience and professionalism of the trainers (13 mentions).
- Proper training, not a "tick and flick" (5 mentions).
- Flexibility of the RTO in meeting clients' needs (covering specific areas), timing and location (5 mentions).

For those located in regional WA, having an RTO in their town was also an important factor in choosing an RTO.

In their own words ...

“Actually educating personnel and not just a tick and flick. Completing thorough and detailed VOC's especially with Scaffolding. The VOC process or skills assessment needs to cover all aspects, more practical assessment over a number of days, not just 3 or 4 hours as this benefits no one, not the individual nor the company.”

“Maintain consistency and ensure their trainers hold appropriate training delivery skills, adequate industry experience with licence being delivered and most importantly don't take short cuts.”

“The people delivering the training and assessing have up to date industry experience. The system with which they are assessing against is flexible enough for team demonstration of skills can be assessed as a group to meet the outcomes and demonstrate the skills needed.”

“The RTO should also have a reputation for not passing students who are not yet competent.”

4.2 Customisation and Flexibility of Course Content

The majority of survey participants report that the RTOs they use for delivery of HRWLs customise the training they deliver to meet client needs some or all of the time.

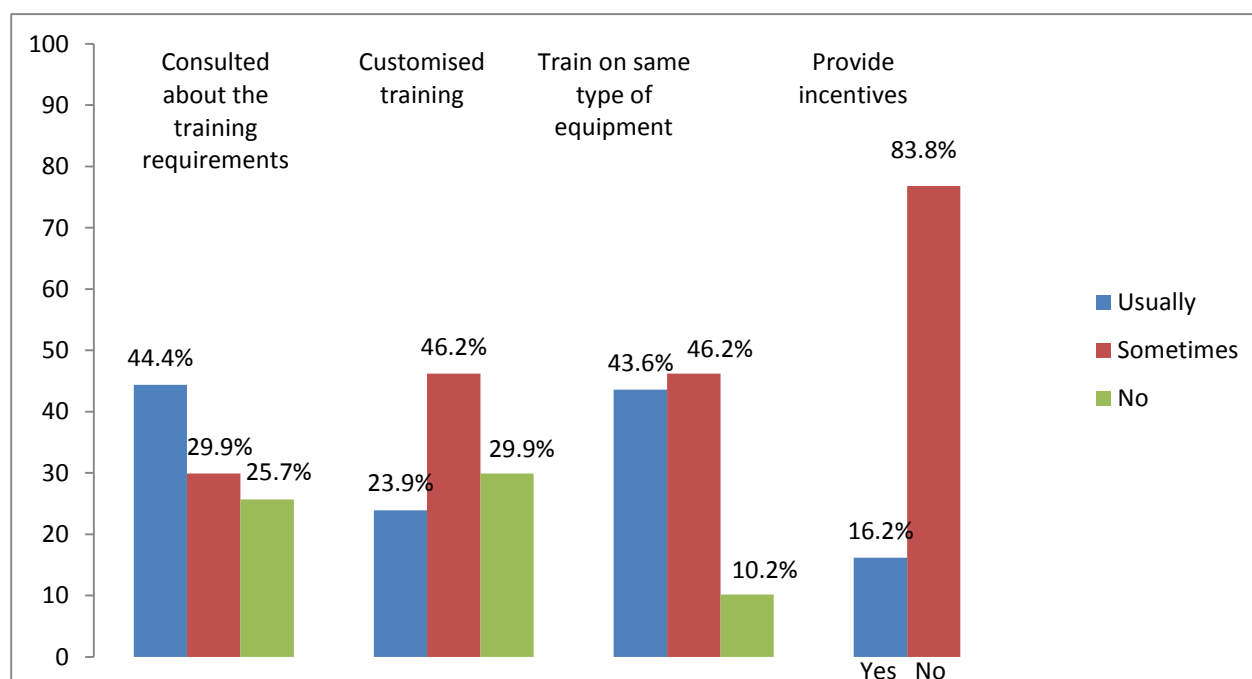
Whilst 74.3 say they are consulted, 44.4% are usually consulted about what training they need to meet their requirements and 29.9% are sometimes consulted.

RTOs usually train on the same equipment that the employer organisation uses amongst 43.6% of employers and a further 48.7% find this happens sometimes. This is less likely to usually happen to companies based in Perth (25.8%).

Whilst customisation was experienced by 70.1% of survey participants, 23.9% usually receive training customised for the needs of their organisation and 46.2% sometimes receive customised training.

Only 16.2% receive incentives from the RTOs for placing their HRWL training with them. Most of these incentives are price-related.

Consulted about training requirements



Q.12a Do they consult with you about what training you need to meet your requirements? n=150

Q.12b Do they customise the training for you?

Q.12c Do they train on the same type of equipment as you use?

Q.12d Do they provide some incentives for you to place your training with them?

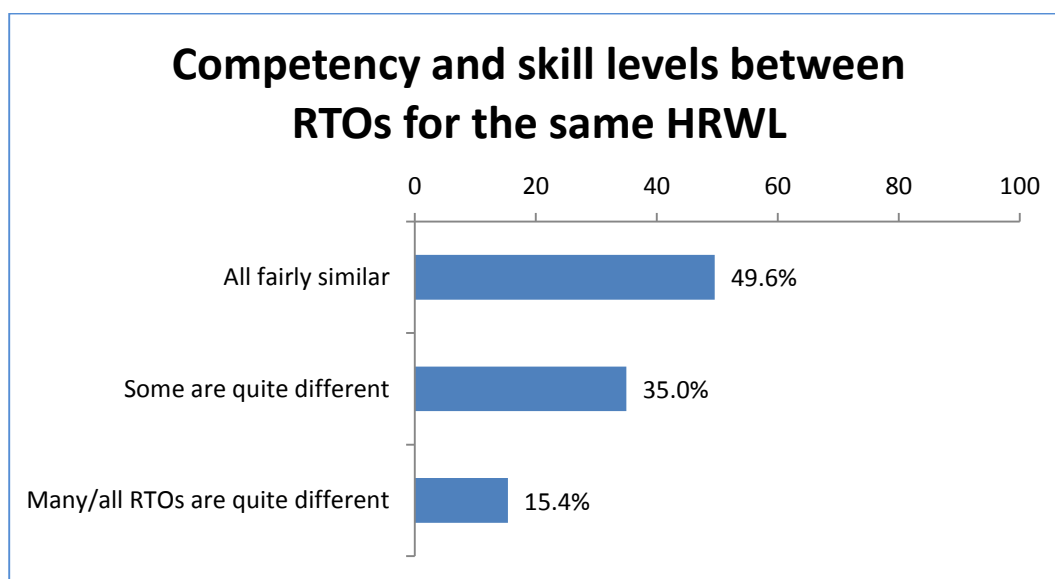
5.0 SATISFACTION WITH THE TRAINING OUTCOMES

Overall, there is felt to be a lack of consistency between RTOs in the training outcomes they deliver. Whilst half the employers believe their employees achieve similar levels of skills and competency regardless of the RTO, half do not.

Satisfaction with the HRWL training is divided; in all 63.8% of employers rated their satisfaction with the HRWL training delivered in the survey as 8 out of 10 or higher, 15.5% scored it 6 or 7 out of 10 and 20.9% scored it 5 out of 10 or lower. The least satisfied are those who feel there are large differences between RTOs in the skills and competency of employees and contractors on completing HRWL training.

5.1 Consistency of Training Outcomes Between RTOs

Survey participants have very different experiences with RTOs; half the companies (49.6%) report that the RTOs produce fairly similar levels of skills and competency for the same HRWL, the remaining half find that the different RTOs graduate employees with different levels of skills and competencies. 35.0% of companies find some RTOs are quite different and 15.4% find many or all RTOs are quite different for the same HRWL.



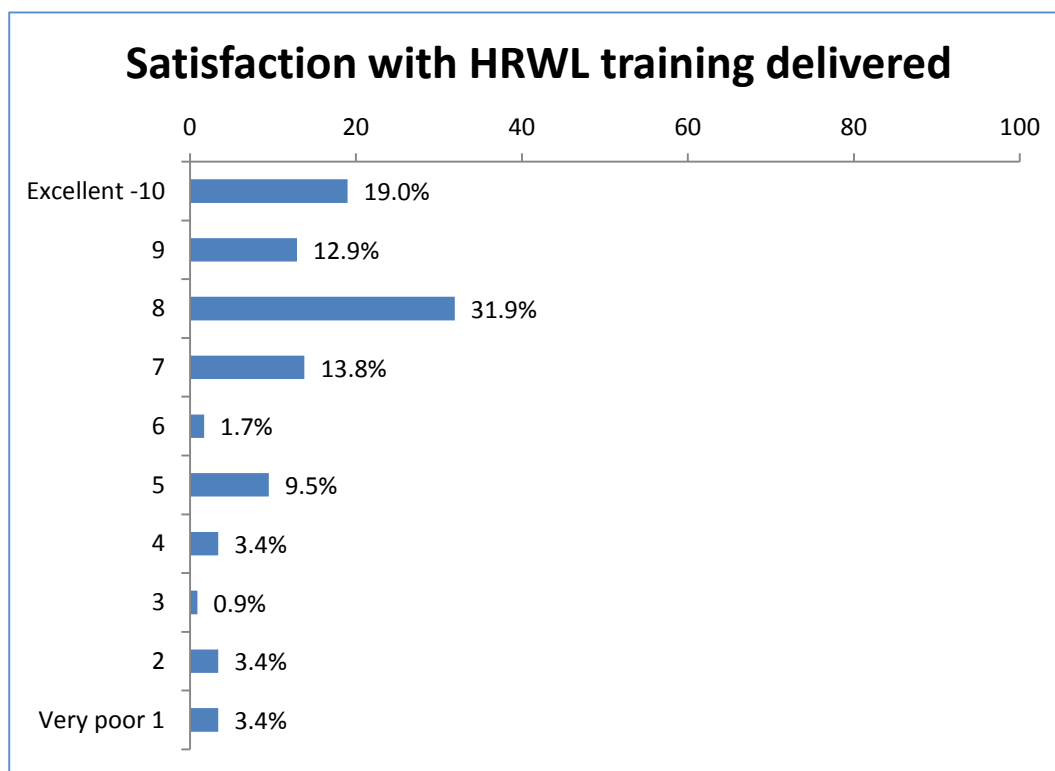
Q.13 Do people receiving the same HRWL have a similar level of competency and skills regardless of the RTO used or are the levels quite different between RTOs? n=150

Survey participants from construction companies (64.8%) and medium sized companies (81.5%) report that the skill and competency levels between RTOs are fairly similar. Whilst few survey participants found large differences between RTOs (15.4% overall), those that did were more likely to come from large companies (25.0%) and from resource companies (23.4%). They were also more likely to come from businesses with a need for Intermediate or Advanced Scaffolding HRWLs (28.3% and 26.5% respectively) and/or from businesses located in the Pilbara (37.0%).

5.2 Satisfaction with HRWL Training

Whilst overall, survey participants are satisfied with the training provided by the RTOs, they are not highly satisfied leaving considerable room for improvement.

5.2.1 Satisfaction with HRWL Training Delivered



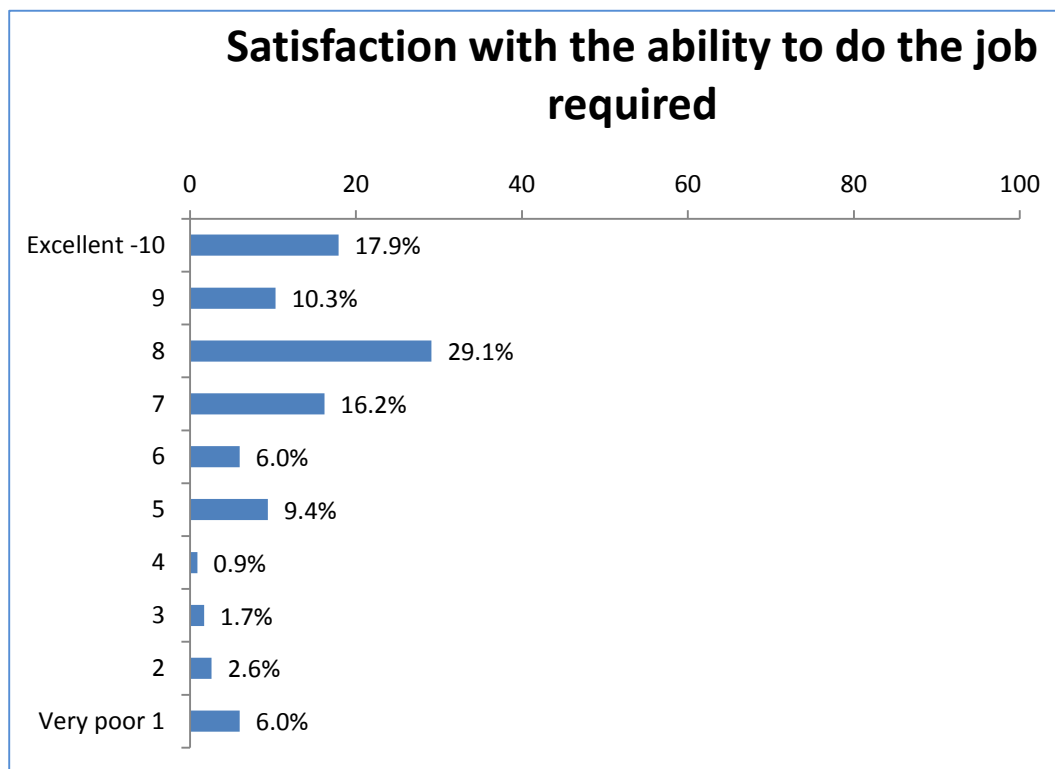
Q.14a Following the HRWL training, how would you rate your satisfaction with the HRWL training delivered? Please use a scale of 1 to 10 where 1 is very poor and 10 is excellent. Please use the whole scale not just the ends. (n=116, 1 don't know)

In all 63.8% of employers rated their satisfaction with the HRWL training delivered in the survey as 8 out of 10 or higher, 15.5% scored it 6 or 7 out of 10 and 20.9% scored it 5 out of 10 or lower.

Those survey participants who felt that many RTOs graduate employees with different skill levels and competencies (see Section 5.1 above) gave much lower ratings with 55.7% rating their satisfaction with the HRWL training delivered as 5 out of 10 or lower.

5.2.2 The Ability of the Person to Do the Job Required

The research indicated that 28.2% rated their satisfaction with the ability of the person to do the job required as 9 or 10 out of 10, this increased to 57.3% when one includes those who rate their satisfaction as 8 out of 10 or more.



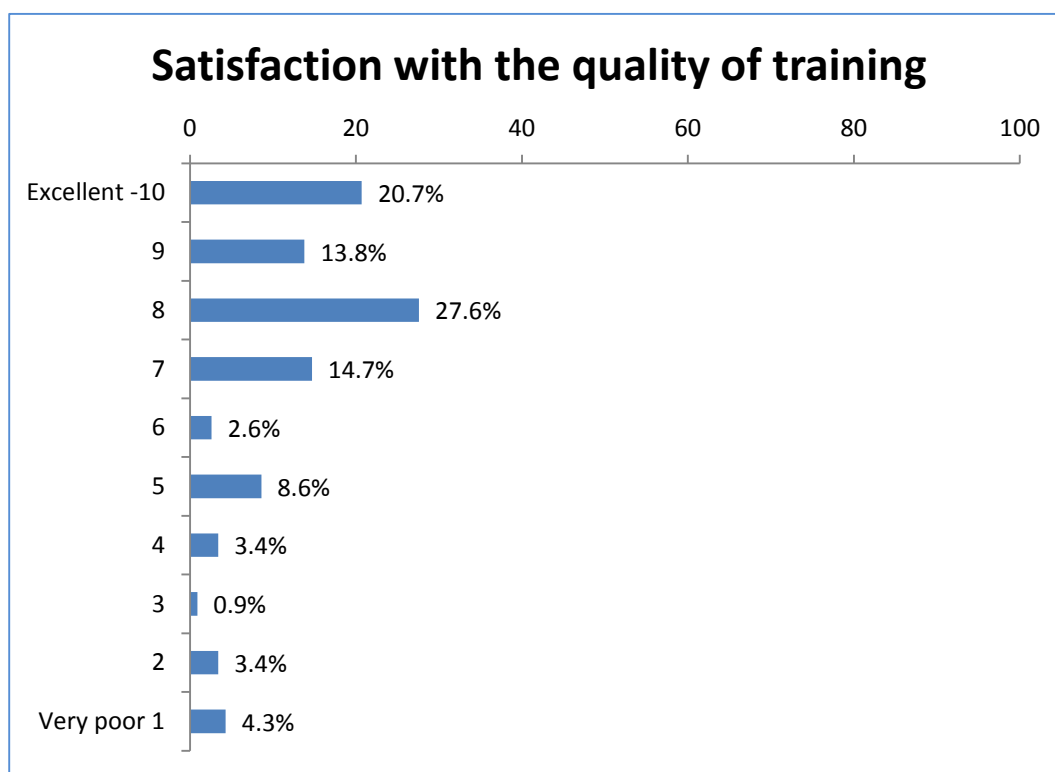
Q.14e Following the HRWL training, how would you rate your satisfaction the ability of the person to do the job required? Please use a scale of 1 to 10 where 1 is very poor and 10 is excellent. Please use the whole scale not just the ends. (n=117)

In all 22.2% of respondents rated their satisfaction as 6 or 7 out of 10 and 20.6% rated their satisfaction as 5 out of 10 or lower.

In all 66.7% of those people who felt that the level of skills and competencies were quite different between RTOs rated the ability of the person to do the job required after training as 5 out of 10 or below.

5.2.3 The Quality of Training

The majority of survey participants (62.1%) rated the quality of the training as 8 out of 10 or better and 20.6% rated the quality of training as 5 out of 10 or below.

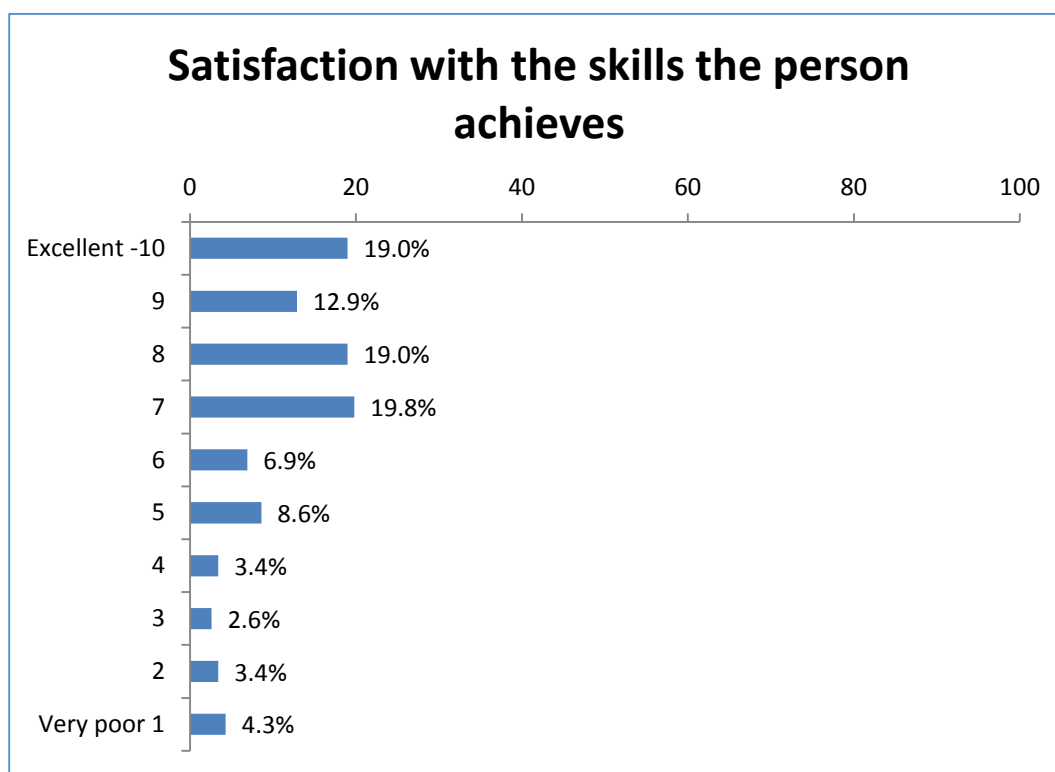


Q.14b Following the HRWL training, how would you rate your satisfaction with the quality of training? Please use a scale of 1 to 10 where 1 is very poor and 10 is excellent. Please use the whole scale not just the ends. (n=116, 1 don't know)

Those people who felt that the level of skills and competencies were quite different between RTOs were the most dissatisfied with the quality of training, 61.2% of these people rating the quality of training as 5 out of 10 or lower.

5.2.4 The Skills the Person Achieves

In all, half of respondents (50.9%) rated their satisfaction with the skills the trainee received as 8 out of 10 or greater, and 22.3% rated skills as 5 out of 10 or lower.

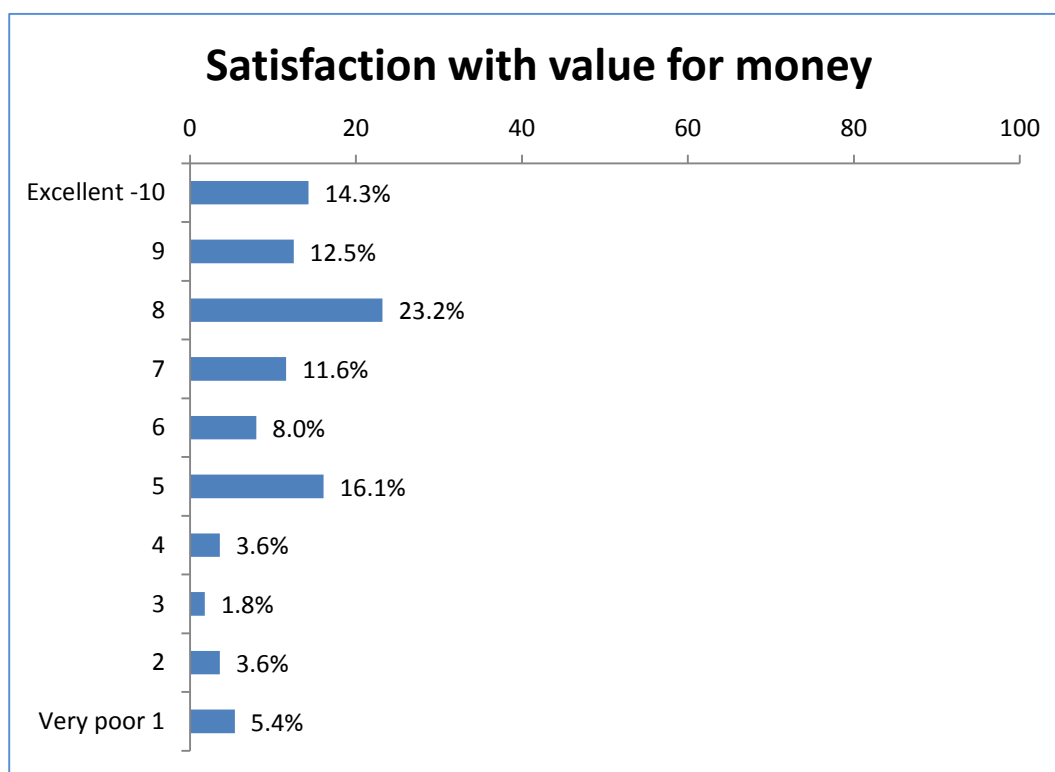


Q.14d Following the HRWL training, how would you rate your satisfaction with the skills the person achieves? Please use a scale of 1 to 10 where 1 is very poor and 10 is excellent. Please use the whole scale not just the ends. (n=116, 1 don't know)

As above, respondents who felt that the levels of skills delivered were quite different between RTOs were the least satisfied with the skills received with two thirds of respondents (66.7%) rating these skills as 5 out of 10 or below.

5.2.5 Value for Money

As above, half (50.0%) of survey participants rated the value for money they received from the HRWL training as 8 out of 10 or higher. A further 19.6% rated it 6 or 7 out of 10.



Q.14c Following the HRWL training, how would you rate your satisfaction with the value for money? Please use a scale of 1 to 10 where 1 is very poor and 10 is excellent. Please use the whole scale not just the ends. (n=112, 5 don't know)

In all 30.5% rated their satisfaction with the value for money they received as 5 out of 10 or below.

6.0 THE APPROPRIATENESS OF HRWL TRAINING

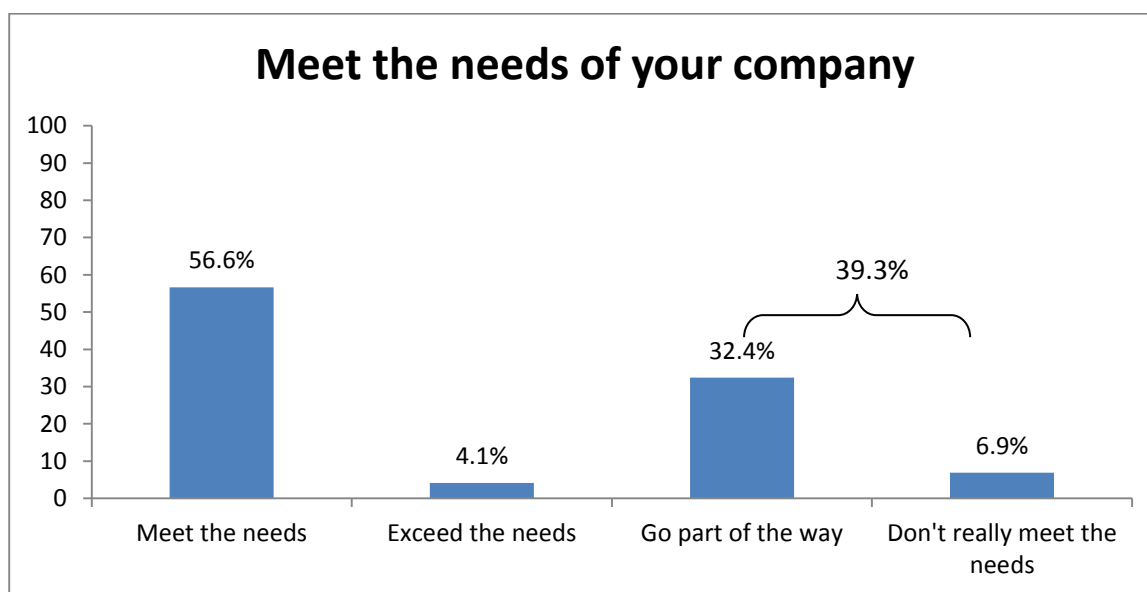
Almost 40% of companies report that HRWL training is not meeting the needs of their business, with the main issue cited being the lack of experience.

Furthermore, just over half of survey participants find that there is a lack of consistency in training outcomes between licence types, although there is no particular licence that is affected more than any other.

6.1 How Well Skills Produced Meet the Needs of Business

56.6% of survey participants report that the set of skills required to obtain the HRWL are appropriate to the needs of their business and this closely correlates with those people who rate their satisfaction with HWRL training as 8 out of 10 and above. A further 4.1% report that the skills required are more than needed for the jobs they are employing for.

The remaining 39.3% find the skills required to obtain the HRWL don't meet the needs of their business, although most of these (32.4%) find they go part way. Only 6.9% report they don't really meet the needs of their business.



Q.15a. How appropriate are the set of skills required to obtain the HRWL to the needs of your business?
n=150

The main area where **needs are not being met relates to the level of experience delivered**. There is a concern that there is too much emphasis on “book learning” rather than hands on experience in a variety of circumstances. The book learning produces licensed employees who believe that because they have a piece of paper they can do the job. Comments include:

- A greater length and variety of experience to complete the qualification, for example using a log book to document the type and amount of experience (12 mentions)
- Mentored experience is required for effective training (6 mentions)
- Verification of competency is conducted over too short a time frame to really assess their skills (4 mentions)
- Incompetent people should not be passed; turning up to the course should not guarantee a pass (2 mentions)

“Mostly when they return from training they are as unemployable as when they went in but it is a statutory requirement to do the training and there is no substitute for on the job experience. Any fool can get a scaffold ticket and scaffold their own house or as in the case of a supervisor attempt to understand scaffolding and the process involved. Owner builders / individuals can get a ticket and be in the workforce. They should have to be retested and gain their full ticket after an apprenticeship / probation period working in the industry with a scaffolding overseer. Just had an employee leave me to work FIFO after just completing his SI and it is a joke that he can go work in the industry when he is completely incompetent as a basic scaffolder - even after 6 months employ. How he got his ticket amazes me? It’s just too easy to get a ticket. They come out of training expecting a pay rise because they have a ticket but to me it’s useless because they have no real knowledge.”

“The system pushes a short course approach to high risk work and I believe that this is one of the main reasons we have accidents. When I trained to become a rigger I had to provide evidence (a log book) of my working under the supervision of a licensed rigger for a minimum of two years before I was eligible to sit the exams. We also tend to condition people to look for a written procedure for doing a job rather than thinking for themselves and having to use their brain.”

“The course is so short the candidates have no time to consolidate any of their learning. There are also major gaps in what is being taught to the level of HWRL. For example, 5 day SB, 3 day SI, 3 day SA, now licensed to erect a dropped scaffold underneath an oil rig in the middle of the ocean!!”

“Training over a set period of time, whether short or extended with a log book, still requires supervision & training on the job to achieve acceptable competency levels. The mistake made by most RTO's is that once the certificate is issued, they assure the candidate they are work ready. At times they offer Verification of competency when not even on the equipment on the actual job.”

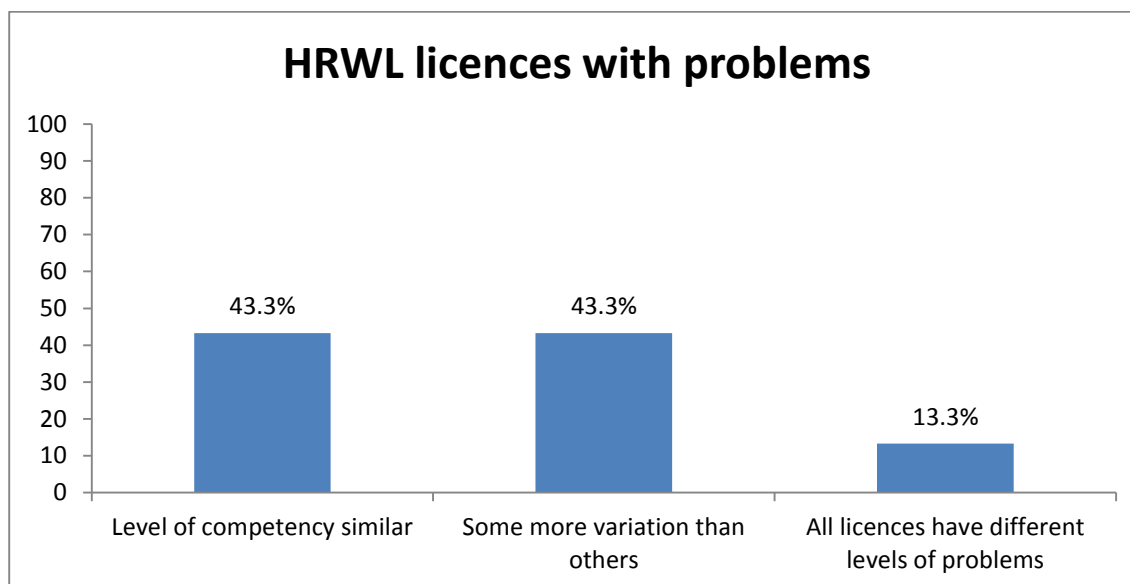
The other key area for improvement is in the course content. A number of survey participants suggest a core / generic skill set be identified and taught, with additional training or customisation to meet the needs of the site, company or particular equipment being used.

“Often time is wasted on things that many participants may never use, i.e. gin poles in advanced rigging. I believe this should be a separate endorsement for those that need it. Also, concrete tilt-up panels are covered yet there is a separate tilt-up panel course. Again, this could be a 2-3 day endorsement additional to the HRWL. Neither of these is ever used in the resources sector yet personnel have to do this in the training. Food for thought - a rigger in the entertainment industry would rarely use a slewing crane let alone tilt panels/material hoists and the like.”

“There are many examples - one would be basic rigging. Our tradesmen are required to hold the basic rigging HRWL for the use of chain blacks and lever hoists. WorkSafe, TAC are focussed on the construction industry they have not catered for the mining industry. As a subject matter expert and lead auditor in the mining industry for 30 years I feel that high risk licensing is at the worst level I have ever seen.”

6.2 Consistency of Training Outcomes Between Licence types

Survey participants report varying experiences between licence types in the level of skills and competency provided; 43.3% find they are all fairly similar. Of the 56.7% who feel the level of skill and competency is not similar, the problem is seen to be limited to some (43.3%) licences rather than many or all (13.3%) of the different licences.



Q.16a. Is the level of competency and skills provided between licence types variable, and do you experience more problems with some types of licences, than others? n=150

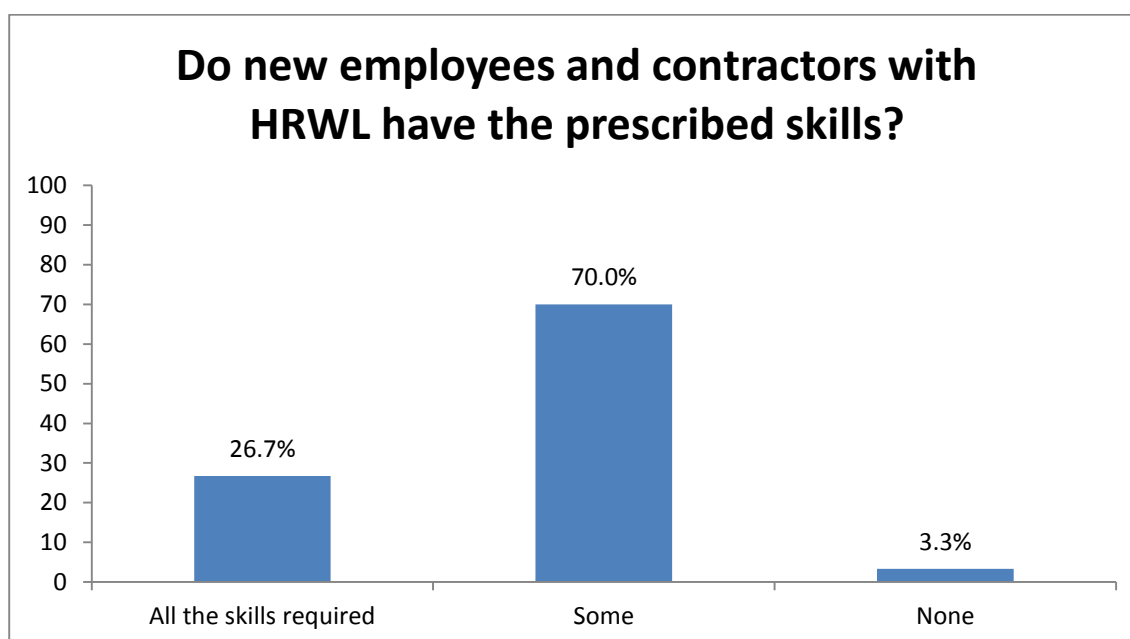
Amongst that 56.7% who report problems, half of them report the problems relate to all licences. Amongst the rest, no particular HRWL stands out as having more problems than any other.

"I've hired so called advanced riggers and they wouldn't know how to tie their shoe laces. You can ask them some basic rigging questions; they roll their eyes and say that I'm supposed to teach them those basics. I hire skilled people to work for me, not to have to train them when they come to work for me. If I wanted labourers I would have hired labourers."

"In too many areas people have tickets yet they are effectively incompetent. Having worked in industry for 40 years I have many skills but few licenses. All too frequently I find I have greater skills than half the licensed tossers you blokes have given tickets to. They can legally do the work; I can't."

“We had major issues with every scaffold RTO in the past. We now do not use any of them other than --- for scaffolding. This training centre is nothing like you see anywhere in Australia and the trainers are far superior in the education of our people. This is the only training business we use and recommend to anyone in the scaffold industry. We still have to use other RTOs for rigging aspects and see the same issues with most RTOs, just want them out the door fast so they can get more people through which means more dollars, and that’s all most RTOs are about – sad to say but most would agree.”

The majority of survey participants (70.0%) find that new employees or contractors presenting with HRWLs usually some but not all the prescribed skills they require for a HRWL. A further 3.3% report they have none of the skills and yet have their HRWL. Only 26.7% present with their HRWL and all the skills required.



Q.17 When new employees or contractors present with high risk work licences, do they usually have? n=150

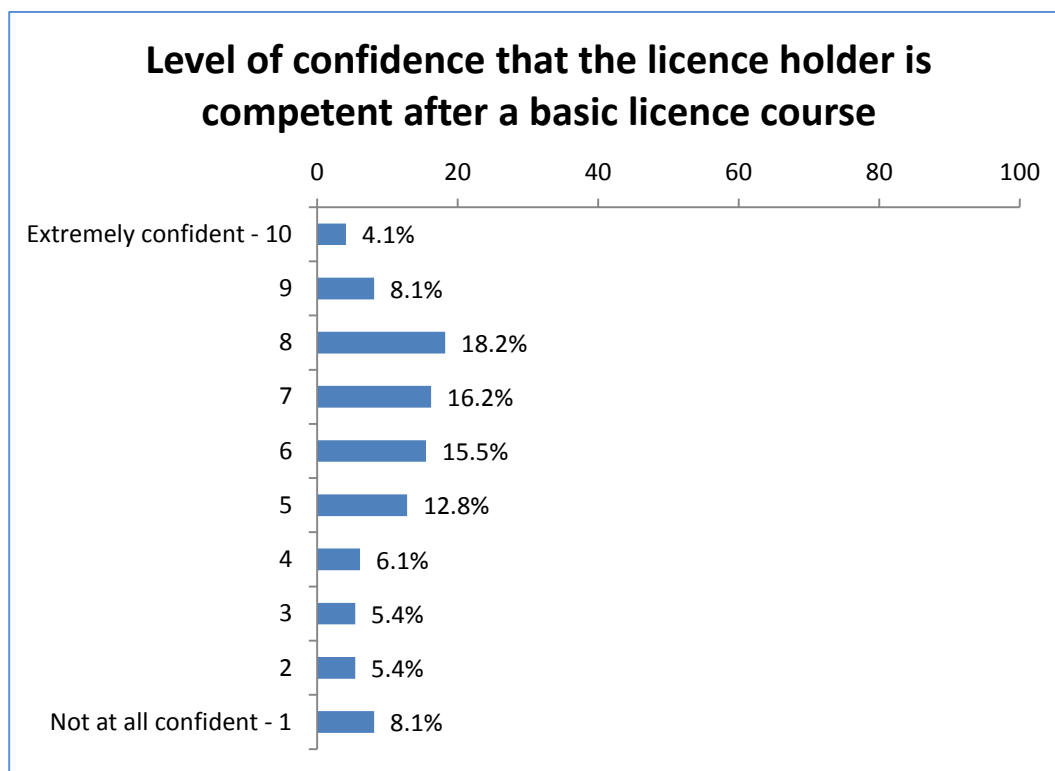
7.0 THE STANDARD OF TRAINING

There is a low level of confidence that once an employee or contractor has completed their basic or advanced licence that they are competent to do the work they are licensed to do. And most of this is attributed to the lack of practical experience the employees have.

There is strong support for practical experience to be a requirement for high risk work licences, both basic and advanced levels.

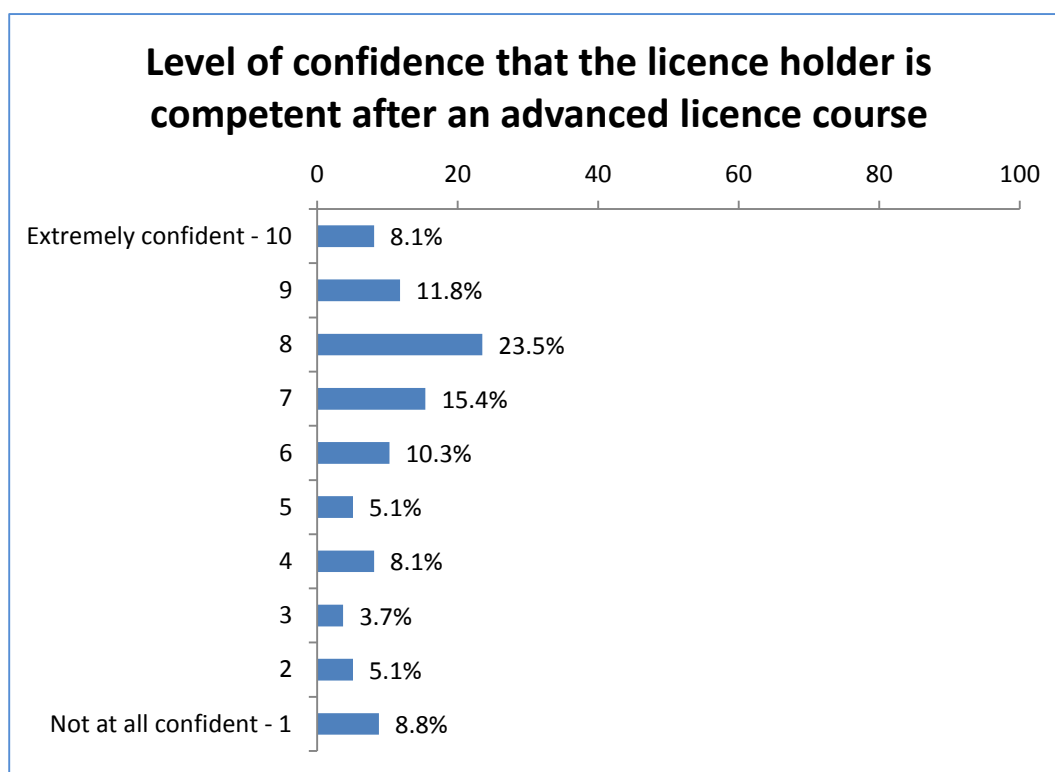
7.1 Level of Confidence in the Standard of Training

Amongst High Risk Work Licences, the proportion of employers who have high levels of confidence in the competency of employees and contractors is small. Only 4.1% of survey participants are extremely confident in the competency of those with a basic HRWL and only 30.4% give a rating of 8 out of 10 or better.



Q.18a In general, how confident are you that once the person has completed their basic licence, they are competent to do the work they are licensed to do on your site? Please rate your confidence out of 10, where 1 is not at all confident and 10 is extremely confident. (n=148, 2 missing)

The figures are only marginally better for the advanced HRWLs – 8.1% of survey participants are extremely confident (10/10) of the competency of employees and contractors with an advanced HRWL and 43.4% are highly confident (8 out of 10 or higher).



Q.18b In general, how confident are you that once the person has completed their advanced licence, they are competent to do the work they are licenced to do on your site? Please rate your confidence out of 10, where 1 is not at all confident and 10 is extremely confident. (n=136, 14 don't know)

The single main factor for this lack of confidence is the lack of practical experience required to get the ticket (25 mentions).

"The construction and mining industry have built a rod for their own back where they require advanced qualifications for personnel on site, but don't require a minimum level of experience. It is possible for someone to sit in a classroom for 20 days and obtain an advanced riggers ticket with no more experience than what is gained in the course. I have a little, albeit reserved, confidence the people holding the license have the skills, knowledge and experience to perform the role to an adequate level of practical competency."

"There are occasions when employees or contractors have completed course levels one after the other, but have no practical skills in application to real life scenarios."

"A person with no experience in construction work or even in scaffolding can complete an advanced HRWL in scaffolding and immediately begin work erecting/dismantling scaffold up to 45 metres in height. I see scaffolding on worksites which is non compliant and when I speak with the scaffolders they are not aware of the scaffolding safety requirements (codes and standards)"

"It's very text booky. The biggest problem is they need to know what to do when things go wrong. That is what makes good riggers, you just can't teach that stuff (in the classroom)."

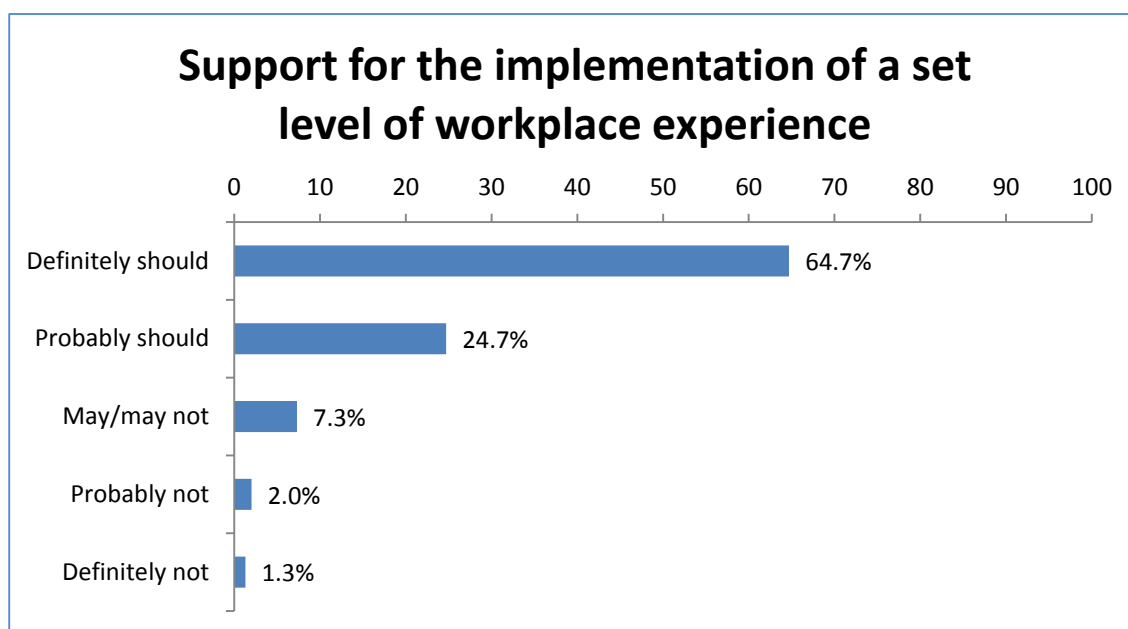
“They don't assess common sense or willingness to do the work. With scaffolding I believe you need to be 100% focussed and apart from the minority, most see it as an easy way to a high paying job or another ticket on their resume to make them more employable. I constantly hear – “yeah I have a scaffold ticket” - but they wouldn't know a coupler from a brace.”

Other concerns relate to:

- Uncertainty that the training is not of sufficient depth for employees to perform the tasks safely and efficiently (5 mentions).
- The fact that employees believe they have a ticket, so they are competent. They don't understand the importance of basics. They don't realise what they don't know or when they don't know (4 mentions).
- Lack of experience and competence of the trainers doing the training (4 mentions).
- Lack of experience, competence and thoroughness of the assessors (3 mentions).

7.2 The Level of Practical Experience Required

Overall, 89.4% of survey participants support the implementation of a **set level of workplace experience** at a basic level before an employee can obtain an intermediate licence and further workforce experience before progressing to an advanced licence. 64.7% believe this should definitely be a requirement.



Q.20a Should a set level of experience be required in the workplace at the basic licence level before a person can obtain the intermediate licence and then be required to gain even more experience in the workforce before they can do an advanced licence? n=150

8.0 VERIFICATION OF COMPETENCY

A verification of competency (VOC) is used by 90.6% of companies in the resources industry and by 60.2% of organisations who said they operate in the construction industry (a small percentage operated in both industries) although not for all licences. The main reasons for doing so relate to confidence in skills competency and safety.

Most use an in house program and those who use an external organisation use one that also delivers HRWL training.

VoC pass rates are high, but retraining amongst those who do not pass happens consistently amongst only 39.0% of companies.

8.1 Use of the VoC process

70.0% of survey participants use a verification of competency (VoC) process at their workplace. 42.7% use it for all high risk work licences and 27.3% use it for some licences. Survey participants from the construction industry were the least likely to use a VoC process (see below).

Verification of Competency	Resources	Construction	Transport	Other
Yes for all HRWL licences	49.1%	34.7%	60.0%	53.8%
Yes for some HRWL licences	41.5%	25.5%	30.0%	30.8%
No	9.4%	39.8%	10.0%	15.4%
	n=53	n=98	n=10	n=13

Q.21 Do you use a certification of competency (VOC) process at your work place analysed by industry type?

32.4% of survey participants report having a separate VoC for each site.

The key reasons for using a VoC process relate to confidence in skills competency and safety.

Reasons for Using a VoC process

To ensure employees or contractors have the appropriate skills to do the job	74.3%
To ensure a safe workplace	71.4%
To ensure employee or contractor skills are current	47.6%
Part of induction process	31.4%
Legislative requirement	26.7%
Company requirement	1.9%

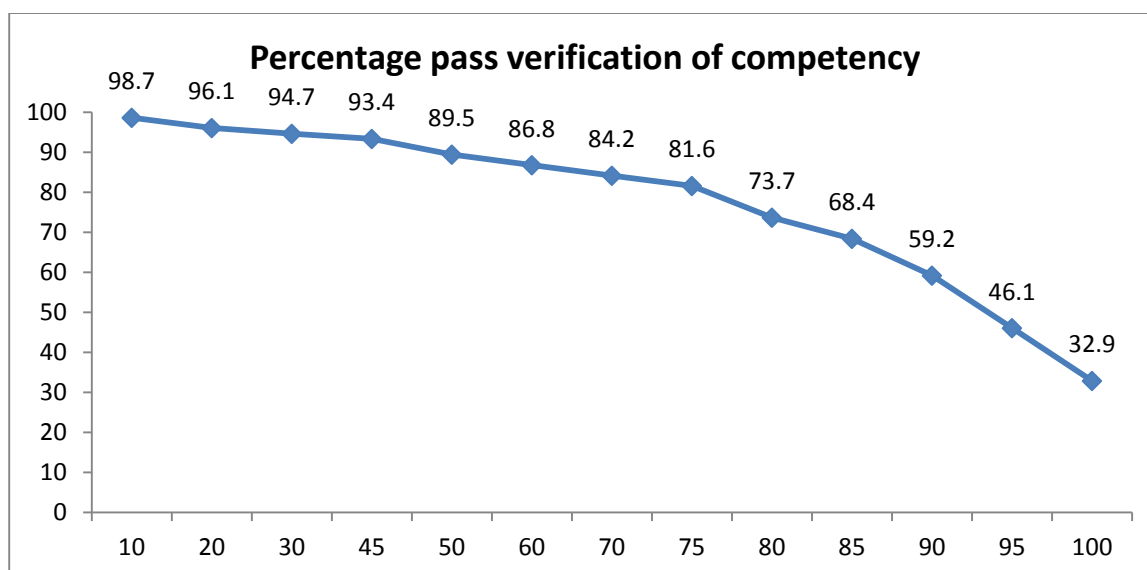
Q.22. Why do you undertake a VoC process? *Multiple responses allowed* (n=105 who use a VoC process)

Responsibility for the VoC process: The majority of employers (72.4%) use an in house program with their own staff, in addition a few do this in combination with an external provider (3.8%). 22.9% only use an external organisation for VOC.

The majority of those using an external organisation (70.8%) use one that also delivers HRWL training.

8.2 Passing and Training

Those who were able to provide information on the VoC pass rates (about half of the respondents) report the pass rates shown below.



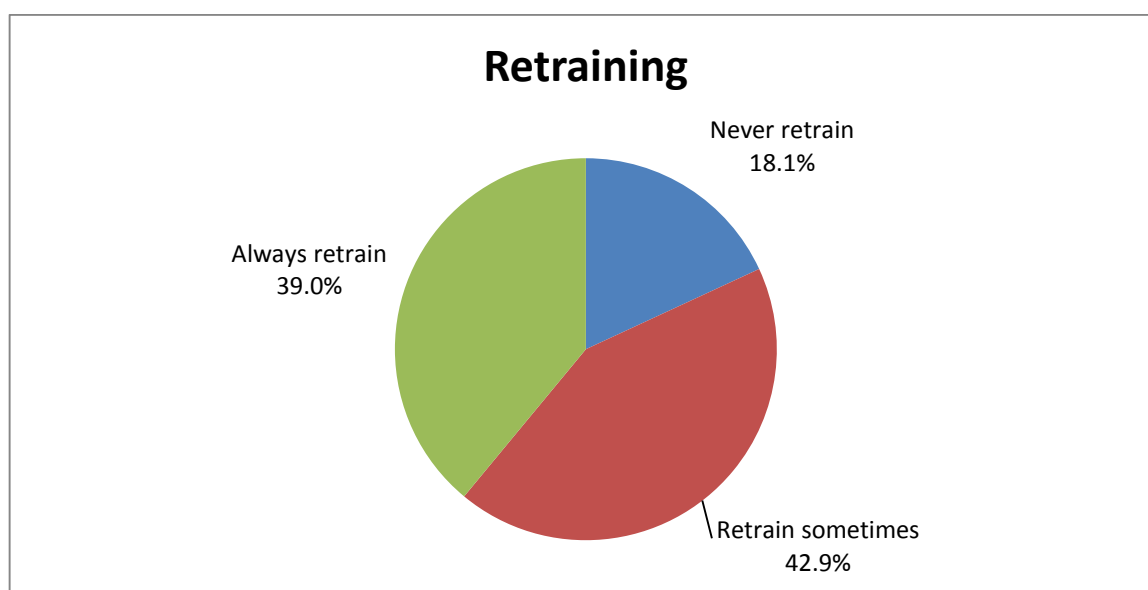
Q26. What percentage (or estimate) of employees pass their verification of competency

Note: The graph should be read as:

- 98.7% of employers reported more than 10% of their employees passing
- 59.2% report more than 90% of their employees passing
- 32.9% report 100% of their employees passing

Retraining of employees who fail their VoC does not happen all the time.

58.1% of them do this retraining in house; 41.9% do it through an RTO.



Q.27 Do you retrain staff or contractors who fail their verification of competency?

9.0 AREAS FOR IMPROVEMENT

Half the employers participating in the survey provided further comments about how HRWL training can be improved.

Again, the topic of **experience** received many comments. Experience is felt to be about competency. It is about being exposed to a variety of situations so that employees know how to handle them. And it is ultimately about safety and about productivity – doing the job right, every time.

“Experience is at least as important as the required training qualification. Currently people can get the formal qualification, but without the experience, our confidence in their ability to perform is not always great.”

“Candidate must have some level of work place experience through mentoring or buddy programme before being able to be engaged by RTO to be trained and receive licence.”

“For Scaffolding I think we should revert back to the old system where a Licensed Scaffolder could have a few unlicensed people in their team. After enough practical and theoretical experience they can then be examined to gain verification of the competency level they have achieved and if achieved the appropriate licence be issued.”

“I think that some level of experience should be gained before any licence is issued, such as a probationers licence until a certain amount of hours is achieved this could be verified by the employer.”

“Needs to be logged-booked, just like the IRATA (International Rope Access Trades Association), 1,000 hours must be completed on the job to be able to sit your next level of training, from Basic 1,000/Intermediate 1,000 to Advanced – actual in-depth training spending 80% of time building multiple scaffold scenarios. This needs to be standard from all RTOs, then and only then will you see an increase in skill and ability and the likelihood of someone seriously injuring or dying dramatically reduced.”

“People must gain experience at the basic level before advancing further. It is absurd that someone can hold an advanced rigging ticket and never been on a job.”

“As far as HRWL's go it is good the person has learnt the skills required but until a person has experienced those "OH SH!#" moments it would be difficult to say they were 100% skilled for the task.”

“The HRWL system needs to go back to a logbook process so people have time to gain the on the job experience. I did a three year traineeship as a Rigger in 1985. We had to have 100 logbook hours on every license we obtained. It took three years to get my RA, SA, Dogman, LF, EWP and C6 Crane. You had enough time to learn the skills and practice them. I have only recently come back to Mining after several years in Construction and the Standard of license holders is getting lower. How you can do two weeks of training and be an Advanced Scaffolder doing Canter lever? Dropped scaffolds is a joke. I wonder how many people could actually set up a Gin Pole if we asked them to. Most people that I have VOC'd in construction could not even tell you the fleet angle of a winch if asked. I found the failure rate was high when working at places like Barrow Island but sadly in the mining industry we have fitters / boilermakers being Riggers and Crane drivers and they do not have the skill set. If they do, they lose it because they do not use the skills frequently enough.”

Hand in hand with experience is the issue of **mandating minimum time periods between qualifications** so employees have the time to cement those skills and avoid the issuing of HRWLs to inexperienced people that some fear is happening today.

“Copy the system that has evolved in the UK. Do not allow scaffolders with no experience to obtain all of their tickets and licences in 'one hit'. Do not rely on VOC's which are as loose as the HRL system and are often carried out in a tick the box manner. To me it seems like a money-generating scheme and not an accurate reflection of a person's skills or experience at all.”

Another area of concern is the **quality and consistency of the RTOs, the trainers and the assessors**. There is a perception amongst some that they are not up to the job and there is no guarantee of quality, let alone consistency across RTOs and HRWL course content and assessment.

“Firstly, Improve the VET knowledge of registered assessors. It is these people who are making the licensing decisions. Having met many of them in the capacity of an RTO manager before starting with this industry employer, I can say that many should be required to re-sit Cert IV TAE. Basic understanding of VoC requirements as well as actual responsibilities of a Trainer or Assessor should be the first priority. Many do not have the skills to be good trainers. Just because a person has been a scaffolder or rigger for X amount of years does not make the person a good trainer. However, WorkSafe who accredits them is only interested in their past experience, not in their capability as a trainer or assessor.”

“The lack of consistency across RTO's is a major problem and this will not be resolved by paperwork audits conducted by State or Federal departments. True audits should be done observing delivery by the trainers and observing the assessing of the participants on the various RTO HRWL programs. Any audits should also include an inspection of the training facility to see if the equipment and environment that the training is being delivered in is suitable to deliver real life work experience.”

“More rigor applied to RTOs. Specific auditing of RTOs. Too many RTO's do not conduct training in the correct manner. (It's) not competency based. VOCs are seen as tick and flick exercises. Trainers should also be regularly assessed as to their competency. Regular audits of RTO trainers on site with reference to their paperwork and practical skills would be of an advantage. Just because the paperwork is signed off does not mean that the training was conducted correctly. The system as it stands today is allowing some RTOs to pass personnel who do not have the required competency to obtain HRWL.”

“Needs to be delivered by people who have performed the work and are experienced in the work rather those who simply hold a training qualification.”

“Improve the auditing and monitoring of HRWL Assessors. For too long WorkSafe and TAC have been leaving the auditing to each other. The result is gaps and too many non-compliant assessors. The old system of WorkSafe auditing the assessors was far better. Ensure TAC has the legal authority to shut down non conforming RTO's.”

“Consistency and recognition of HRWL across all States within Australia would be of assistance.”

“Ensure VOC's are an accredited training process, (via an RTO), that is nationally recognised, (just like the licence), and portable from site to site for up to 2.5 years, - i.e. half the life cycle of the HRL.”

“The VOC process needs to be relevant to the skills being assessed; you cannot trust an RTO to conduct a VOC when they have provided substandard training in the first place. How about you put some secret shoppers through some courses to see how bad it really is out there?”

There is also a call for **more thorough assessment of skills and competencies**, to ensure those holding a HRWL can perform the tasks they are trained for.

“One of the questions, in this survey asked about the skills of new employees. The question should also include the underpinning knowledge and practical application of it. Most scaffolders and riggers, even those in industry for many years, cannot demonstrate knowledge during a VOC assessment yet can show the skills. Let's face it, anyone can use a spanner. More time should be allocated to both (useful) knowledge and skills if it wasn't spent on things they are unlikely to use once they are licensed.”

“The course material provided at training is excellent however most organisations skim over it and only complete the parts needed to pass the exam. Exams need to be a closed book. It needs to be acceptable to fail a course regardless of the consequence on fees charged.”

“A thorough assessment of the person's ability in understanding of the training undertaken and not just the fact that they have attended needs to be carried out before the licence is granted.”

“Applicants for HRWLs should be verified 'in the field' prior to receiving their HRWL. This way their competence can be assessed outside of a controlled classroom scenario and their compliance with associated factors such as safety control measures, pre-inspection of equipment etc. can be adequately verified.”

Course content, length and cost attracted some comment. Ultimately, they are all linked to the need for the courses to be fit for purpose - thorough to cover the essentials fully and properly, no unnecessary duplication given that the training involves taking productive resources out of the business for days at a time, and not penuriously expensive for the business. More **flexibility to recognise prior learning** and to **fill the gaps in knowledge or competency** would also be welcomed.

“A lot of these courses should not be run in such a short space of time with the attitude that no one fails. There needs to be more time spent on most of them. More than half of the info is just skimmed over.”

“A course may be booked to run for 5 days but can easier be completed in 3 days. There seems to be a lot of duplication between high risk tickets on the first day of each course.”

“Many WorkSafe Assessors feel they are entitled to huge payments because they have that accreditation. This makes extending the duration of training courses an unviable option. I personally would like to see that Scaffolding and Rigging be a minimum of 3-4 weeks training though many employers would disagree because of costs. In its current form the only one making money is the Registered Assessors and I've already questioned their VET knowledge and skills.”

“A more flexible system would be good for RPL for experienced staff whose ticket has lapsed or is not recognised in WA.”

“Assess the person’s skill and knowledge level prior to training. Many could have the desired level and only require a refresher and not sit through full training. RTOs need to understand the requirements and not have predetermined, out of date ideas that do not suit industry e.g. stating set log book hours for everyone regardless of their skill levels.”

“There should be more allowance for recognized prior learning and courses modified in length of time and cost to reflect less time needed in training.”

Training in regional areas is a particular area of concern for those not based in Perth. It is costly and classes are often not run because of small student numbers. Ultimately, the consequence of poor access to training is employee safety.

“Have more training facilities in the regional centres. The local Institute of Technology only runs courses if they have the numbers and you often find the course has been cancelled due to lack of numbers and their costs are too expensive. We have either been sending our employees to Perth or paying for a training company in Perth to send one of their trainers down to conduct the courses on our premises. To increase the numbers we enquire if any of our clients need any of their employees to complete the course we are running.”

“Training Council should look at the individual needs of each region. Provide more assistance and maybe assist with subsidies to the individual Perth based trainers, so it is attractive for them to come down to the regions rather than having training centralised in Perth. This increases dramatically the training costs for the student or the employer because of the extra accommodation, travel and extra time costs. Lack of training in the regions increases the danger of having untrained workers on site due to no choice (the job has to be done and risks are taken) or running the risk of having workers on site with fake licences.”

“We are in an established industry in a small area and it is difficult to get training done. I have had one person booked for a course for eight months and because the numbers are not high enough the course keeps being delayed. He is a good competent employee but by law he should not be working with me. Can rural areas get more subsidy to enable smaller class sizes?”

A number of other suggestions relate to:

- A centralised register of HRWL holders so employers can check the bona fides of prospective employees and contractors.
- Compiling evidence from thorough adverse incident investigations involving high risk work to provide feedback on the breadth and depth of coverage of HRWL skill and competency areas.
- Develop tools to allow industry to make objective assessments of RTOs.
- Make HRWL holders fully accountable for their actions, just like holders of motor vehicle licences.
- Developing (where they don't exist) Australian Standards for the equipment being used in high risk work to reduce the likelihood of things going wrong.

10.0 SAMPLE PROFILE

A sample of 150 employers or contractors took part in the survey, all of whom employed and contracted people with High Risk Work Licences (HRWLs).

The participants were drawn from across the state, many with multiple locations in both Perth and country regions. Just under 60% were located in the Perth and Peel regions and 64.0% had locations in regional WA. Participants represented a mix of business sizes, with just under half being large businesses (100+ employees).

The majority of survey participants were in the construction industry (66.0%) and 36.0% in the resources sector; it should be noted that some companies participated in multiple sectors. Understandably, the resources companies were generally large businesses and the construction companies were small and medium-sized businesses.

The most popular HRWLs were Elevated Work Platforms and Dogging (used by more than 80.0% survey participants), Basic Rigging, Non Slewing Mobile Cranes and Basic Scaffolding (used by at least 64.0% of companies). In total, 74.7% had an interest in Rigging HRWLs, 72.0% were interested in Scaffolding HRWLs, and 36.0% were interested in Slewing Mobile Cranes over 100 tons HRWLs. Larger businesses mostly used employees / contractors with the Rigging, Scaffolding and Mobile Crane HRWLs.

Business Size	None – I am self-employed	0.0%
	Small 1 - 20 employees/contractors	30.0%
	Medium 21 – 99	23.3%
	Large 100+	46.7%
Industry	Construction	66.0%
	Resources	36.0%
	Transport and Logistics	6.7%
	Other (specify)	0.0%
	Miscellaneous	7.3%
Location	Perth	57.3%
	Peel	6.7%
	South West	19.3%
	Great Southern	8.0%
	Goldfields/Esperance	14.7%
	Mid-West	11.3%
	Wheatbelt	4.0%
	Pilbara	21.3%
	Kimberley	5.3%
	Perth + Peel	58.7%
Regional WA (outside Perth & Peel)	64.0%	
HRWL's that are relevant to the business	EW – Elevated Work Platform	86.7%
	DG – Dogging	84.0%
	RB – Rigging Basic	68.0%
	RI – Rigging Intermediate	48.0%
	RA – Rigging Advanced	42.7%
	SB – Scaffolding Basic	64.0%
	SI – Scaffolding Intermediate	48.7%
	SA – Scaffolding Advanced	43.3%
	CN - Non slewing mobile cranes	64.7%
	CO - Slewing mobile cranes over 100 tonnes	36.0%

APPENDICES

Technical Appendix 1 - Sampling and Data Collection Specifics

Component	Details
Project Management Team	
Research Solutions Contact	Nicky Munro
Client Contact	Kane Depiazz, Training Accreditation Council
Data programming company	Thinkfield
Field Company Credentials	ISO 20252
Research Methodology	
Data collection method	Online survey
Sampling Methodology	
Target population for survey	Employers in High Risk Work Licence industries employing staff
Source of sampling frame e.g. Access panel, Grey Pages, client provided list, customers visiting xxx between date & date	Online survey distributed by industry associations in the Department of Mines & Petroleum to members and organisations on their distribution lists
If using an Access Panel (note below or NA):	N/A
<ul style="list-style-type: none"> Selection criteria for the sample 	Census
<ul style="list-style-type: none"> Appropriateness of the sample for the purpose 	Completely appropriate, these employers employed people with HRWL
Sampling Technique e.g. quota /probability / convenience / geographical coverage if relevant	Convenience sample across Western Australia, stakeholders and RTOs were screened out of the questionnaire at Q.2
Sample Size e.g. if sample size achieved was different from planned sample, note this and reason why	150
Was sample quota'd? (note below or NA):	N/A
Fieldwork	Data collection undertaken by client's stakeholder organisations and industry bodies
Pilot study date(s)	3-13 November 2015
Changes made as result of pilot	Some changes to wording
Survey dates	11 November – 7 December 2015
Questionnaire length / administration time	10 minutes
Incentives provided for respondents e.g. No / yes & description of incentive	No
If using client provided product/incentive (note below or NA):	N/A
Survey Procedure for Online / Mail surveys (note below or delete):	
<ul style="list-style-type: none"> Administration process 	Covering email and link sent to each of the organisations distributing the questionnaire to members
<ul style="list-style-type: none"> Number of reminders to non-respondents 	Two reminders to non-respondents at the beginning of the second and third weeks

Data Collection Outcomes:	
Response Rate or Participation rate (non-probability samples) <i>delete as required</i>	Total number of members to whom the survey was sent is unknown as is the number of eligible employers
Overall sampling error	This is a convenience sample; if full coverage of the industries using HRWL was obtained the sampling error would be $\pm 8\%$ at the 95% level of confidence
Validation procedures	Not required as survey was self-completion
Data Coding, Analysis and Data File Treatment	
Validity and Reliability Issues	This is a convenience sample with an unknown universe
Data coding	<ul style="list-style-type: none"> • N/A
Consistency checks	<ul style="list-style-type: none"> • Preliminary data file checked by Project Manager using SPSS: <ul style="list-style-type: none"> ○ Frequency counts ○ Relevant cross tabulations • Data outside the range/duplicates or abnormalities investigated
Treatment of missing data	<ul style="list-style-type: none"> • One response was excluded from analysis and noted where relevant •
Was sample weighted? (note below or NA):	No
Any estimating or imputation procedures used	NA
Statistical tests used	<i>See Survey Research Appendix: Statistical Tests</i>
Data file provided to client	If requested
De-identified data files retained	For five years

This project has been undertaken in compliance with ISO 20252.

Technical Appendix 2: Statistical Tests

Test:	One Sample T-Test of a Proportion
Use:	To determine if the proportion of a variable in one sub-sample is significantly different to the proportion of the same variable in some other group, such as: <ul style="list-style-type: none"> • The sample overall (i.e. sub-group differs to the sample in general) • The rest of the sample (e.g. sub-group of people aged 18-24 differs to the sub-group of people not aged 18-24).
Data Assumptions:	<ul style="list-style-type: none"> • Measure being tested is normally distributed within the two (sub-) samples. • Data must be interval or ratio. • Variance of measure being tested is roughly similar (homogeneity of variance). • Appropriate version of the test chosen for independent or dependent samples.
Test Measure / Cut-off Criterion:	<p>$p \leq 0.05$ i.e. the difference between two groups has only a 5% probability of occurring by chance alone</p>
Issues to be aware of:	<p>The result should be both statistically significant and clinically or tactically or strategically significant. Be mindful of statistically significant differences where:</p> <ol style="list-style-type: none"> 1. The sample sizes are very large 2. Scores within the groups are very similar (i.e. the groups have small standard deviations)
Test:	Z-Test
Use:	To determine if the proportions of a variable in two independent samples are significantly different.
Data Assumptions:	<ul style="list-style-type: none"> • Measure being tested is normally distributed with the two samples. • Data must be interval or ratio. • Sample size is large enough to form a normal curve ($n > 30$) • Variance of measure being tested is roughly similar (homogeneity of variance).
Test Measure / Cut-off Criterion:	$p \leq 0.5$
Issues to be aware of:	<p>The result should be both statistically significant and clinically or tactically or strategically significant. Be mindful of statistically significant differences where:</p> <ol style="list-style-type: none"> 1. The sample sizes are very large 2. Scores within the groups are very similar (i.e. the groups have small standard deviations)

Test:	Chi Square (Pearson's chi-square)
Use:	To determine if two variables are related by more than chance alone.
Data Assumptions:	<ul style="list-style-type: none"> • Data is from a random sample. • Data must be nominal, ordinal or interval. • Sufficiently large sample (absolute minimum $n=30$) & adequate cell sizes ($n=10+$) • Observations must be independent. • Observations must have the same underlying distribution. • Data is unweighted
Test Measure / Cut-off Criterion:	$p \leq 0.5$

Test:	False Discovery Rate
Use:	To adjust the results of tests of statistical significance to reduce the chance of finding results to be significant when they are really due to sampling error.
Data Assumptions:	The data assumptions are relevant to the underlying tests of significance being "adjusted"
Test Measure / Cut-off Criterion:	$q \leq 0.5$

Appendix 3: The Questionnaire

High Risk Work Licence Employer and Contractor Survey

Do you or your company employ or contract workers involved in dogging, rigging, scaffolding or crane or EWP operations?

If you do, the Training Accreditation Council (TAC) would like to know your views on the quality of high risk work licence (HRWL) training in your industry and how you feel it can be improved and how well the licences meet your business needs.

TAC regulates registered training organisations (RTOs) who operate in Western Australia or Victoria only. As part of its regulatory function, TAC is undertaking a strategic industry audit (SIA) of RTOs which deliver training that leads to the issuance of HRWLs in Western Australia. The purpose of an SIA is to provide a 'point in time' snapshot of the quality of training and assessment in a specific industry area.

The findings of the survey will be used to help TAC understand the issues impacting on your industries and compare these with the audit findings. The survey will not ask questions that identify individuals or companies, so you can be assured your responses will be confidential. A summary of survey findings will be published in the SIA report, which will be published in early 2016 and will be available on the TAC website (www.tac.wa.gov.au).

The survey will take about 10 minutes to complete. You can leave it at any time and it will restart where you left off. **We would appreciate it very much if you would complete the survey by the 10th December**

If you would like to know more about the SIA or the survey please contact Angela Hollingsworth on 9441 1986 or angela.hollingsworth@des.wa.gov.au

Please note:

This survey is being conducted on behalf of TAC by Research Solutions, a Perth-based research company. You have the right to access any information you have provided as part of the survey and request that this information be destroyed.

Research Solutions' privacy policy is available on its website (www.researchsolutions.com.au) and provides further details regarding how you can access or correct information, how you can make a privacy related complaint and how that complaint will be dealt with. You can also contact the Privacy Officer Nicky Munro on 0411 600 074.

Please click on the link below to start the survey

Firstly, just a few questions about you and your business to help us understand the answers that you provide

1. Do you or your business employ or contract people with High Risk Work Licences (HRWLs)?

Yes	<input type="checkbox"/>
No/ don't know	<input type="checkbox"/> <i>programmer thank and terminate survey refer to the results availability at the end</i>

2. How many people does your business employ or contract? *Programmer single response*

None – I am self-employed	<input type="checkbox"/>
Small 1 - 20 employees/contractors	<input type="checkbox"/>
Medium 21 – 99	<input type="checkbox"/>
Large 100+	<input type="checkbox"/>

3. What industry are you in? *Programmer allow multiple response*

Construction	<input type="checkbox"/>
Resources	<input type="checkbox"/>
Transport and Logistics	<input type="checkbox"/>
Other (specify).....	<input type="checkbox"/>

4. Where are you based in WA? *(programmer allow multiple response)*

Perth Metro area	<input type="checkbox"/>
Regional: South west	<input type="checkbox"/>
Regional: North	<input type="checkbox"/>
Regional Eastern	<input type="checkbox"/>

5. Which of the following HRWLs are relevant to your business? *(Multiple response)*

EW – Elevated Work Platform	<input type="checkbox"/>
DG – Dogging	<input type="checkbox"/>
RB – Rigging Basic	<input type="checkbox"/>
RI – Rigging Intermediate	<input type="checkbox"/>
RA – Rigging Advanced	<input type="checkbox"/>
SB – Scaffolding Basic	<input type="checkbox"/>
SI – Scaffolding Intermediate	<input type="checkbox"/>
SA – Scaffolding Advanced	<input type="checkbox"/>
CN - Non slewing mobile cranes	<input type="checkbox"/>
CO - Slewing mobile cranes over 100 tonnes	<input type="checkbox"/>

Training Requirements

- 6a Are your employees/contactors required to hold HRWLs prior to being employed?
- Yes
- No
- 6b. Do you refer existing employees/contactors for training to obtain HRWLs?
- Yes Go to 7
- No skip to Employee/Contractor Skills Q15a
- Not applicable Employee/Contractor responsibility skip to Employee/Contractor Skills Q15a
7. Who usually pays for the training of an employee or contractor in your business?
- All paid by the employer
- All paid by the contractor
- All paid by the employee
- The employee makes a contribution to the cost of training
- The contractor makes a contribution to the cost of training
- It varies depending on the licence
- HRWL is a pre-employment requirement
8. Does the employee:
- Receive paid time off for the training
- Takes leave without pay
- Not applicable

9. How is the time allowed for the training of each licence for each employee determined?

- Award/agreements/industrial arrangements
- The employer specifies the length of the course
- The RTO specifies the length of the course
- Employer and RTO negotiate the length of the course together
- Other ways (type in)
- Not applicable

10. For the training leading to HRWLs do you use:

- A single preferred RTO or
- Multiple RTOs

11. How important are the following factors in selecting your RTO? Please score each of the following factors out of 10 where:

1 is not at all important
 10 is critically important
Please put in one number against each statement

Score out of 10

- A good record of getting the employees licensed [_____]
- The ability to offer the training I require when I need it [_____]
- A low cost [_____]
- Running courses out of hours like weekends [_____]
- The ability to deliver training at my site [_____]
- Keeping the courses short [_____]
- Online courses [_____]
- A reputation for doing a thorough job of the training [_____]

Is there anything else that you consider is an important factor in selecting your RTO? *(Type in)*

.....

12. Now thinking about the RTOs you use for delivery of HRWLs:
- a. Do they consult with you about what training you need to meet your requirements?
- Yes usually
- Yes sometimes
- No
- b. Do they customise the training for you?
- Yes usually
- Yes sometimes
- No
- c. Do they train on the same type of equipment as you use?
- Yes usually
- Yes sometimes
- No
- d. Do they provide some incentives for you to place your training with them?
- Yes
- No
- If yes, what incentives are offered (programmer not mandatory)
13. Do people receiving the same HRWL have a similar level of competency and skills regardless of the RTO used or are the levels quite different between RTOs?
- All fairly similar
- Some are quite different
- Many/ all are quite different
14. Following the HRWL training, how would you rate the following?
Please rate each out of 10 using a scale of 1 to 10 where 1 is very poor and 10 is excellent, don't know =99, please use the whole scale not just the ends.
- Score out of 10**
- a. Your satisfaction with the training delivered
- b. The quality of the training
- c. The value for money of the training
- d. The skills that the person achieves
- e. The ability of the person to do the job required

Employee/Contractor skills

Thinking of the ability of the person to do the job required

15a. How appropriate are the set of skills required to obtain the HRWL to the needs of your business?

Meet the needs of my business

Go part way there to meeting the needs of my business

Don't really meet the needs of my business

More skills than needed for job requirements

Programmer If 9a (2 or 3) ask:

15b Where do you feel the needs are not met or exceeded?

.....

.....

16a. Is the level of competency and skills provided between licence types variable, and do you experience more problems with some types of licences, than others?

All fairly similar **Go to 17**

Some licences have much more variation in skills than others

Many/ all are quite different

16b. Which type of HRWL do you experience the most problems?

- | | |
|--|--------------------------|
| EW – Elevated Work Platform | <input type="checkbox"/> |
| DG – Dogging | <input type="checkbox"/> |
| RB – Rigging Basic | <input type="checkbox"/> |
| RI – Rigging Intermediate | <input type="checkbox"/> |
| RA – Rigging Advanced | <input type="checkbox"/> |
| SB – Scaffolding Basic | <input type="checkbox"/> |
| SI – Scaffolding Intermediate | <input type="checkbox"/> |
| SA – Scaffolding Advanced | <input type="checkbox"/> |
| CN - Non slewing mobile cranes | <input type="checkbox"/> |
| CO - Slewing mobile cranes over 100 tonnes | <input type="checkbox"/> |
| All have their own issues | <input type="checkbox"/> |

Comment:

17. When new employees or contractors present with high risk work licences, do they usually have: (tick one)

- No skills
- Some but not all the prescribed skills they require for a High Risk Work Licence
- All the prescribed skills of the High Risk Work Licence

18a. In general, how confident are you that once the person has completed their basic licence, they are competent to do the work they are licensed to do on your site? Please rate your confidence out of 10, where 1 is not at all confident and 10 is extremely confident

1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	----

Not at all confident

extremely confident

18b. In general, how confident are you that once the person has completed their advanced licence, they are competent to do the work they are licensed to do on your site? Please rate your confidence out of 10, where 1 is not at all confident and 10 is extremely confident

1	2	3	4	5	6	7	8	9	10
---	---	---	---	---	---	---	---	---	----

Not at all confident

extremely confident

If not confident to Q18a or b ask:

19. What are the factors that impact on your level of confidence? *Type in full*

.....

.....

20. Here are some views which have been expressed and we would be interested in your feedback on them.

- a. Should a set level of experience be required in the workplace at the basic licence level before a person can obtain the intermediate licence and then be required to gain even more experience in the workforce before they can do an advanced licence? *tick the one closest to how you feel*

- | | |
|-------------------|--------------------------|
| Definitely should | <input type="checkbox"/> |
| Probably should | <input type="checkbox"/> |
| May/ may not | <input type="checkbox"/> |
| Probably not | <input type="checkbox"/> |
| Definitely not | <input type="checkbox"/> |

- b. Is it appropriate for students with no workplace experience to go from basic to advanced HRWL course in one week or less? *tick the one closest to how you feel¹*

- | | |
|-------------------|--------------------------|
| Definitely should | <input type="checkbox"/> |
| Probably should | <input type="checkbox"/> |
| Undecided | <input type="checkbox"/> |
| Probably not | <input type="checkbox"/> |
| Definitely not | <input type="checkbox"/> |

Verification of Competency

21. Do you use a verification of competency (VoC) process at your workplace?
- | | |
|----------------------------|--|
| Yes for all HRWL licences | <input type="checkbox"/> |
| Yes for some HRWL licences | <input type="checkbox"/> |
| No | <input type="checkbox"/> Go to General areas for improvement |
- If yes to Q21 (codes 1 or 2) ask Q22-28:*

¹ This question was withdrawn as it was found not to reflect industry practice

22. Why do you undertake a VoC process? MULTIPLE RESPONSES

- Legislative requirement
- To ensure a safe workplace
- Part of induction process
- To ensure employee or contractor skills are current
- To ensure employees or contractors have the appropriate skills to do the job
- Other specify

23. Who is responsible for conducting VoC processes at your sites?

- In-house program and staff
- External organisation
- Other

24. If an external organisation conducts your VoC process, do they also deliver the HRWL training?

- Yes
- No

25. Do you have a separate verification of competency for each site?

- Yes
- No

26. What percentage (or estimate) of employees pass their verification of competency?

.....%

27. Do you retrain staff or contractors who fail their verification of competency?

- Yes always
- Yes sometimes
- No

28. If yes, how are staff or contractors retrained?

- In-house training
- Retrained with RTO

General areas for improvement *Programmer ask all*

31. Do you have any other comments about how HRWL training can be improved? (*describe in full*)

.....
.....

Thank you for participating in this survey. The results will be included in the report on the Strategic Industry Audit of HRWLs which will be published in early 2016 on the Training Accreditation Council's website.

Appendix 4: Verbatim Responses

The following pages contain the verbatim responses to the open-ended questions in the survey. Not all survey participants answered these questions and the comments cannot be taken as representative of the opinions of all participants.

Minimal editing has only been performed for clarity purposes.

Q11. Is there anything else that you consider is an important factor in selecting your RTO?
Ability to meet our needs when we need them to be met at a minimal cost and disruption to business
Actually educating personnel and not just a tick / flick. Completing thorough and detailed VOC's especially with Scaffolding. The VOC process or skills assessment needs to cover all aspects, more practical assessment over a number of days, not just 3 or 4 hours as this benefits no one, not the individual nor the company.
After Training Support
An RTO that automatically deducts the CTF rebate from the cost of the course makes managing training much easier.
Availability and duration of course
Availability of courses at short notice
Competent Teacher/Trainer
Ensure that there is sufficient exposure to employees for gaining experience in line with the qualification i.e. Intermediate to Advanced forms of training require different amounts of exposure for experience purposes.
Good communication / follow up for any issues that may arise.
Good correspondence with the RTO's representative
Good feedback from attendees and there supervisors regarding relevancy etc
Good reputation
Harder training and proper tests.
Having a RTO in town!
Location
Location and complying with above criteria
Location of the RTO, as we are located in the South West (Busselton)
Maintain consistency and ensure their trainers hold appropriate training delivery skills, adequate industry experience with licence being delivered and most importantly don't take short cuts.
No compromise on quality or time taken to train as a result of pressure from the requesting company
Professional
Professional, and admin returns calls/emails in a timely manner
Professionalism
Quality training at a competitive price, and stick to the agreed time frame so we can plan our training relief roster.
Record/reputation for training in general
Reputation to deliver thorough, high quality training
RTO must complete our company safety qualification process before they can become a supplier to us
RTO needs to provide quality training but be flexible with employer needs
Running as a partnership. Deliver the training to our requirements. Important is the ability of the RTO to manage their side of the agreement
Standard of training must be of the highest quality, no cutting corners and consistency within the trainers

Q11. Is there anything else that you consider is an important factor in selecting your RTO?
Supporting local companies.
The ability to modify training to suit our requirements
The capacity to understand the capabilities and needs of indigenous trainees as well as regular employees, and ensure that all trainees are provided with an equal opportunity to succeed in their chosen field
Feedback from the persons undertaking the courses, i.e. was the training good/ bad and worthwhile or was it just treated as a tick and flick, meaning you paid the fee so you are guaranteed to get the ticket regardless of your competency
The people delivering the training and assessing have up to date industry experience. The system with which they are assessing against is flexible enough for team demonstration of skills, they can be assessed as a group to meet the outcomes and demonstrate the skills needed.
The quality of the working relationship between the employer and the RTO including alignment of values, quality reputation and low staff turnover, particularly their high risk trainer/assessors
The RTO needs to listen to industry and be flexible with delivery, time and content
The RTO should also have a reputation for not passing students who are not yet competent.
The RTO's in Western Australia have failed, as they have zero accountability for the individual and the education is dated and unacceptable. People are dying. Not educated, specialist
The training is done with comparable equipment to what the trainee will be using once qualified.
We look for people who are flexible with location and accommodating to our needs
Who are the Trainer / Assessors?
Work conditions. Modern facilities. Trainers experience.
Yes, I would like them to stop selling us plastic!

Q15b. Where do you feel the needs are not met or exceeded?
A HRWL is a license which means all are trained in the basics which in parts means all workers have a strong base to improve from; however experience is the key to a competent worker, and each individual has various levels of experience. The VOC system I have witness on numerous sites and for different contractors is on the whole quite poor; it's a very short verification of competence. I believe the Log book system (Brown Book) is warranted to document experience and various types of experience. e.g. www.rms.nsw.gov.au/business-industry/partners.../certification.pdf
Actual training being provided is not comprehensive enough
As an example, an advanced licence can be obtained in two weeks. In other countries this take a minimum of three years. Says it all.
Common sense
Common sense should still be allowed to be used
Demolition involves understanding multiple High Risk areas and a HRWL does not ensure the worker is effectively trained to operate this equipment on a demolition site. For demolition activities, they still need to be mentored and have done demolition training.
Does not relate to site-specific standards
Due to the different standards of the training, we need to conduct a verification of competency after the training to ensure they have been trained correctly and can competently perform the task.
Employees are qualified to the highest level in approximately 3 weeks dependant on the qualification, however in some instances candidates may have never been exposed to the conditions in which they are required to work. The real world is very different to a classroom.
Essentially the view is any person can obtain a HRWL - which in personal opinion should not be the case. Needs are not being met with respect to large differences in quality of delivered training where we continually see incompetence.

Q15b. Where do you feel the needs are not met or exceeded?
Even though most RTO's meet standards, the QUALITY of training varies between them
I have found that the majority of successful trainees have had some prior experience with the equipment (if putting a 'first timer' into a course). Refresher courses are generally not much different to initial training, so trainees can be bored/disengaged after the training.
Industry specific requirements
It seems that the Competency Based Training has not been successful. A lot of people with "Qualifications" but not really experienced.
Lack of on-site experience with an competent worker on hand
Majority of our business is single storey residential housing.
Many providers pass people who are not competent and never will be. Rigging is a good example of this.
Mostly when they return from training they are as unemployable as when they went in but it is a statutory requirement to do the training and there is no substitute for on the job experience. Any fool can get a scaffold ticket and scaffold their own house or, as in the case of a supervisor, attempt to understand scaffolding and the process involved. Owner builders/individuals can get a ticket end be in the workforce. They should have to be retested and gain their full ticket after an apprenticeship/probation period working in the industry with a scaffolding overseer. Just had an employee leave me to work FIFO after just completing his SI and it is a joke that he can go work in the industry when he is completely incompetent as a basic scaffolder - even after 6 months employment. How he got his ticket amazes me. It's just too easy to get a ticket. They come out of training expecting a pay rise because they have a ticket but to me it's useless because they have no real knowledge.
Needs are met by achieving the regulatory license requirements for high risk work, however they are not met entirely from the perspective of actual competence
Not specific to operation procedures
Often time is wasted on things that many participants may never use. i.e. Gin Poles in Advanced Rigging. I believe this should be a separate endorsement for those that need it. Also, concrete Tilt-up Panels are covered yet there is a separate Tilt-up Panel course, again, this could be a 2-3 day endorsement additional to the HRWL. Neither of these is ever used in the Resources sector yet personnel have to do this in the training. Food for thought - A Rigger in the Entertainment Industry would rarely use a slewing crane let alone tilt panels/material hoists and the like.
Personnel having completed the course not aware of basic requirements which leads to poor standard of work (Particularly in scaffolding work found on our worksites) The HRWL training courses appear to be getting shorter in duration which can lead to important information not being covered.
Practical experience
Prior experience is not up to an acceptable standard in being granted a HRWL
Project Specific Requirements
RPL and RCC. It is very onerous getting RTO's to get involved with this process, easier to do the course again.
Scaffolding activities in general, a lot of scaffolders are not clear about basic requirements even if they hold an advanced scaffolder ticket
Site and industry specific hazards
Some site requirements and job specific requirements can vary.
Sometimes skill sets are very generic, and do not cover relevant industry situations
The "generic" training mostly meets the needs but does rely on the trainer "personalising" the training to meet specifics for site i.e. site procedures, equipment etc. I don't believe much can be done about this.
The attitude that here is no failing any course, even though some of these high risk skills can kill. The pass rate is 100% no matter how you complete the course, the attitude of the employee is that they don't have to listen and learn in the course, but just be there and at the end of it they have their ticket.

Q15b. Where do you feel the needs are not met or exceeded?
The course is so short the candidates have no time to consolidate any of their learning; there are also major gaps in what is being taught to the level of HRWL, example 5 day SB, 3 day SI, 3 day SA, now licensed to erect a dropped scaffold underneath an oil rig in the middle of the ocean!!
The courses are generic and cover a mix of construction and mining scenarios. At the basic level this is OK but not beyond that
The HRWL as it stands just now does not take into account the experience factor. All too often we see Advanced Scaffolders or Advanced Riggers who are issued license's after a 10 day program at an RTO. The system needs to be stepped with gates between levels with evidence through logbook/APP of time and task completed.
The HRWL is limited and there are not clear standards once a license has been obtained in regards to license renewal or refreshers.
The individual's pre-existing skills are more relevant than the training. Site based training after a licence is received is where people learn how to carry out 'high risk' work. It's a bit like your car licence - you learn how to drive safely when you're driving on the road, not in the paddock.
The needs of an arborist using an EWP are very different to other occupations. We rig trees, which is not a common practice and not very well understood.
The Scaffolding Education Tool, the Trainers delivering need a complete review, as it is it has FAILED, it takes 4 years at Uni to educate grade 1 kids in Perth and yet 10 days of so called education and you are able to deliver HRL education????????
The timing in getting the issued credentials
There are many examples, one would be Basic rigging, our tradesmen are required to hold the basic rigging HRWL for the use of chain blacks and lever hoists. Work Safe, TAC are focussed on the construction industry they have not catered for the mining industry. As a subject matter expert and lead auditor in the mining industry for 30 years I feel that high risk licensing is at the worst level I have ever seen.
Tick and flick training, not enough exposure to the real world.
Training is not good enough for all high risk trades. It should go back to the days of proper traineeships under the guidance of experienced personnel with existing High Risk Work Licenses prior to the issue of license. Assessments should be given after the traineeship prior issue as well
Training over a set period of time, whether short or extended with a log book still requires supervision & training on the job to achieve acceptable competency levels. The mistake made by most RTO's is that once the certificate is issued, they assure the candidate they are work ready. At times they offer Verification of competency when not even on the equipment on the actual job
Training programs always seems to be the same training topics. In the region, RTO's are having problems bringing down trainers if not enough students sign up... Therefore, certain training topics do not happen and the same training keeps occurring because those particular trainers are prepared to come to the region...
We have been on waiting list for scaffold and dogging for over 12 months, can't get enough people together to run a course
What I have seen is the training does not go into enough detail, they brush over things too quickly leaving too many questions in certain people's minds, and the practical side of the assessments can be next to nothing.
Where do I start, basically the stuff that is taught in the classroom is nothing like it is in the real world. The assessment was a disgrace and some answers required to pass do not line up with Australian Standards. I know this because I am telling my employees one thing and they are trying to tell me I am wrong, it was a test question. So I go to the standards and turns out they have been taught WRONG. They came up with some crazy maths equation that is totally irrelevant and completely useless for dual crane lifts. The trainer did have a few good tricks to show them but that was in the practical. I have basically had to un-train them and train them myself.
Workers need long term structured training. The old permit system was far better as a worker could operate the High Risk Plant.

Q16b. Which type of HRWL do you experience the most problems? Comment:
As a small owner Builder I think some of the Dogging and Crane operators are rushing sometimes to get the next job for their company. The Dogging man is usually a contractor to the Crane company not a direct employee. I think I am correct with that statement.
As EWP are used day in day out people are complacent with their use and risks
Due to LLN limitations (Maths)
However having given my answer we still complete a Visual Observation Checklist, (V.O.C) on all mobile equipment. Guidance and overseeing is conducted with new dogmen but once they have been observed undertaking a lifting task then they are deemed competent.
In the majority of cases the employee or contractor only requires/utilises about 10 to 20% of the skills learnt to obtain the licence.
In too many areas people have tickets yet they are effectively incompetent. Having worked in industry for 40 years I have many skills but few licenses. All too frequently I find I have greater skills than half the licensed tossers you blokes have given tickets to. They can legally do the work, I can't.
Inadequate standards on EWP's.
I've hired so called advanced riggers and they wouldn't know how to tie their shoe laces. You can ask them some basic rigging questions; they roll their eyes and say that I'm supposed to teach them those basics. I hire skilled people to work for me, not to have to train them when they come to work for me, if I wanted labourers I would have hired labourers.
Only experience minor issues and rarely any problems. Just slight inconsistencies between trainers and different RTO's
RTO to ensure there is enough and appropriate time for exposure to experience as experience necessary for Rigging Basic is very different to experience necessary for Rigging Advanced etc. Do not want RTO to rush through training, want them to assess against appropriate time frames.
Short courses with little to no instruction
The process needs to go back to being a Certificate of Competency and passing needs to be based on understanding of the requirements of the ticket. For example; a traineeship followed by a qualification is much better than the existing system of a qualification followed by a traineeship.
The System has failed!!
We contract out the Scaffolding, we don't require Rigging past basic but send a few supervisors to get advanced Rigging so they have a better concept of the License, Our workshops require basic rigging only for Come-A longs / chain Pullers and all the rest of the skills are not used IE : Mast climbers, material hoist, winches, Span wires and Safety nets, thing like steel erection are not used as we only do mechanical repairs but need Basic rigging just to use chain Blocks/ chain pullers.
We do not experience problems with any of the HRWL, they are what they are and an employee can only conduct work for which they are licensed in. The Telehandler RIIHAN309D is not a HRWL but we feel it should be as this poses issues depending on what attachment is being used.
We had major issues with every scaffold RTO in the past. We now do not use any of them other than -- for scaffolding. This training centre is nothing like you see anywhere in Australia and the trainers are far superior in the education of our people. This is the only training business we use and recommend to anyone in the scaffold industry. We still have to use other RTOs for rigging aspects and see the same issues with most RTOs, just want them out the door fast so they can get more people through which means more dollars, and that's all most RTOs are about – sad to say but most would agree.
What is one problem with one employee's interpretation of a point may not be a problem with another one's.
When considering DG is also covered in CO and RB, and could be course on its own and recognised when completing the higher level course
When getting RA's VOC'd we have had people fail
Where possible I try to use RTO's with similar brands of equipment to us.

Q16b. Which type of HRWL do you experience the most problems? Comment:

You should add forklift

Q19. What are the factors that impact on your level of confidence?

A person with no experience in construction work or even in scaffolding can complete an advanced HRWL in scaffolding and immediately begin work erecting/dismantling scaffold up to 45 metres in height. I see scaffolding on worksites which is non compliant and when I speak with the Scaffolders they are not aware of the scaffolding safety requirements (Codes and standards)

Ability to piece together planning and safe work requirements. Ability to do the simple aspects of a job - i.e. not leave open edges etc. Continued supervision required for licensed trades who see themselves as competent however more often than not from on the basis of the quality of work they dish up.

Advanced Scaffolding can be achieved with little or no experience. Scaffolding Basic can be achieved in 4.5 days with no experience and that person can erect scaffold to 45 metres in height!!

After the candidates complete their HRWL in the mining industry they are required to complete a VOC (verification of competency). This is a DMP regulation. We are currently experiencing around 50% of all candidates who sit the VOC are NYC (not yet competent).

All persons are only competent at time of training not competent at industry requirements or operating within industry.

Already commented on in previous question, the time between basic, intermediate and Advanced need to be stepped with hours experience logged centrally against the licence holder

Although they have done the training my level of confidence remains in the lower end due to a belief that the personnel have not gained the levels practical experience required to align with the level of licence achieved.

An Employee should be able to do some onsite training for a probationary period and then do the training and obtain the HRWL. They will then have some understanding of what they are learning and be better able to take the information in and when they go out on the job they will start really learning the work.

As previously said, prior experience is not required to the level it once was, and the standard being accepted nowadays is poor

Can you train them to switch brain on

Common sense. Caution

Compromise on level of training vs. work place consolidation

Experience

Experience on the job is a big thing, as most personnel that have just done training with an RTO don't know or understand too much.

Experience. There are occasions when employees or contractors have completed course levels one after the other, but have no practical skills in application to real life scenarios.

A few days of training do not guarantee a person is competent on the job. Several hours of practical training should be mandatory.

General lack of experience

Having tried several training providers, most are more interested in processing as many people as they can (for profit) and not in improving the skills of WA's work force. There is absolutely no doubt the quality of training has deteriorated significantly and we now have many "qualified" people who are not competent and in some cases dangerous if they were to use their ticket at work.

Inexperience is the main factor followed by one certificate for all. The same ticket is held by an experienced person as the long term unemployed guy who Centrelink put on a course to satisfy his unemployment benefits condition.

It's very text booky. What is taught in the classroom is like some fantasy world. There is not much that they take away from the classroom that is any good to me. The biggest problem is they need to know what to do when things go wrong. That is what makes good riggers, you just can't teach that stuff.

Q19. What are the factors that impact on your level of confidence?
Lack of exposure to the industry and ease of obtaining a HRWL.
Lack of practical skills. Lack of knowledge of OSH requirements. Lack of knowledge of Australian Standards related to the class of high risk work
My experience seeing people coming through the RTO process
New employees should also have a log book of hours showing past works and experience.
On site experience with a competent worker
Once the employee gets there license they think they know everything. My issue is that we have to have a license before they can start work legally without getting supervised experience first. I had a competent worker removed from site because he was not licensed and picked up a hammer.
People completing their advanced ticket in 10 days, this is a joke. When we have new scaffolders come into our business we send them straight over to --- for a 2 days skills assessment. The pass rate for the ticket they hold is only around 15 to 20%. This is concerning that there are RTOs out there that just sign off on tickets just to get paid. When we ask most of the new guys that have just got their ticket what the course was like, majority turn round and say their training was an absolute joke. Normally answers on the white board when completing their assessment. Some have even been issued high risk licences with not even touching a single piece of scaffolding.
Practical experience and actual operating time. IF they have multiple categories or only one
Practical on the job experience
Renewal of licence fast tracked if there is prior experience
Short length required to obtain the advanced ticket not enough time to teach everything required to conduct the job.
The ability of the trainer to pass on the information required and the ability of the trainee to retain this information. People have different levels of coordination this impacts on their ability to perform many tasks especially with the operation of EWP
The construction and mining industry have built a rod for their own back where they require advanced qualifications for personnel on site, but don't require a minimum level of experience. As it is possible for someone to sit in a classroom for 20 days and obtain an advanced riggers ticket with no more experience that what is gained in the course, I have a little, albeit reserved, confidence the people holding the license have the skills, knowledge and experience to perform the role to an adequate level of practical competency.
The Entire System is Not working and has not worked..
The fact that an advanced licence can be obtained in two weeks.
The lack of proper education and experienced trainers
The length of exposure to the works/process, understanding of knowledge and risk, verification of the individuals competencies on site.
The quality of the training provided by some providers is very low. Examples include both Confined Space and Working at Heights licenses achieved in under 3 hours and EWP licenses achieved with only 20 minutes of actual equipment operation
Their experience on the particular machine/job/equipment/skill.
They don't assess common sense or willingness to do the work. With scaffolding I believe you need to be 100% focussed and apart from the minority most see it as an easy way to a high paying job or another ticket on their resume to make them more employable. You shouldn't be able to retain a license in something if you are not actively doing it. I constantly here - yeah I have a scaffold ticket from builders etc - but they wouldn't know a coupler from a brace. Past employers should be contacted for some sort of reference before tickets are issued. There is no way I would let some people get any ticket. So the main factor is real experience.
Training programs are too short.
Uncertainty that the training is at the depth required to complete the task safety and efficiently
Variable quality of assessors and trainers

Q19. What are the factors that impact on your level of confidence?

When a labourer gets a job and works, the employer thinks that this person is promising, so he puts them through some form of high risk training. The attitude of some of these people is that they have never achieved anything in their career before and all of a sudden they have got a high risk ticket. It makes them proud, but they don't really give a toss if they can do the works required with the high risk certificate.

Q31. Do you have any other comments about how HRWL training can be improved?

1. Improve the auditing and monitoring of HRWL Assessors. For too long WorkSafe and TAC have been leaving the auditing to each other. The result is gaps and too many non-compliant assessors. The old system of WorkSafe auditing the assessors was far better. 2. Ensure TAC has the legal authority to shut down non conforming RTO's

1. More rigour applied to RTO's. 2. Specific auditing of RTO's, too many RTO's do not conduct training in the correct manner, not competency based, VOC's are seen as tick and flick exercises. 3. Time on task log books should be reintroduced for all HRWL's especially for all crane operators. 4. Trainers should also be regularly assessed as to their competency. 5. Regular audits of RTO trainers on site with reference to their paperwork and practical skills would be of an advantage, just because the paperwork is signed off does not mean that the training was conducted correctly. The system as it stands today is allowing some RTO's to pass personnel who do not have the required competency to obtain HRWL.

A CCC enquiry into the state of the industry and the RTO'S

A course may be booked to run for 5 days but can easier be completed in 3 days. Their seems to be a lot of duplication between high risk tickets on the first day of each course.

A HRWL such as a forklift or possibly an EWP licence can be completed in 2 days & have a person competent. Licences such as Crane operations I feel need industry experience, there are a wide set of variables in the workplace that most RTO's cannot duplicate, also someone who completes a HRWL & does not use that competence immediate is likely to have a limited confidence/competence.

A lot of these courses should not be run in such a short space of time with the attitude that no one fails there needs to be more time spent on most of them. More than half of the info is just skimmed over

A person who had SB on their licence, had not used the skill for 15 years...but as they renew the licence each year this is not checked. There is no currency requirement and when we employ people that have a licence they should be able to use it. One person failed their VoC with our provider yet passed with another group the next day without doing anything further....

A thorough assessment of the person's ability in understanding of the training undertaken and not just the fact that they have attended needs to be carried out before the licence is granted.

Applicants for HRWLs should be verified 'in the field' prior to receiving their HRWL, this way their competence can be assessed outside of a controlled classroom scenario and their compliance with associated factors such as safety control measures, pre-inspection of equipment etc. can be adequately verified. The ability for 'back to back' training results in many cases with advanced license holders with little or no competence at a basic level

As an employer we send all of our employees to preferred RTOs for Training in order to maintain consistency of quality. Contractors however come from many different RTO's and cost seems to be a big driver rather than quality. Verifying contractor skills is a time consuming but essential part of the pre-task process.

As noted previously - Traineeships.

Consistency and recognition of HRWL across all States within Australia would be of assistance.

Consistency across RTO's

Copy the system that has evolved in the UK. Do not allow scaffolders with no experience to obtain all of their tickets and licences in 'one hit'. Do not rely on VOC's which are as loose as the HRL system and are often carried out in a tick the box manner. To me it seems like a money-generating scheme and not an accurate reflection of a person's skills or experience at all.

Q31. Do you have any other comments about how HRWL training can be improved?
Courses are too long for what they deliver.
Don't employ impractical tossers as trainers
Ensure that businesses check to see that the equipment used in the training is appropriate or similar to that used on site.
Ensure training organisations are accountable in delivery of high quality training courses and maintain consistency across the board from content and material preparation through to delivery styles and formats.
Ensure VOC's are an accredited training process, (via an RTO), that is nationally recognised, (just like the licence), and portable from site to site for up to 2.5 years, - i.e. half the life cycle of the HRL.
Every now and then, there should be some one that fails and has to do the course again, and I do believe that many of these trainees should fail, but the TRO's pass them out. This would pass on a message that you actually do have to listen and learn in the course.
Experience
Experience is at least as important as the required training qualification. Currently people can get the formal qualification, but without the experience, our confidence in their ability to perform is not always great.
Experience is generally far better than training in my views. I believe there should be hours on the job or a time frame between getting higher tickets in the same high risk i.e. scaffolding, rigging, crane etc.
Experience is generally the best teacher
First and foremost would be to assess the person's skill and knowledge level prior to training, many could have the desired level and only require a refresher and not sit through full training. RTO's need to understand the requirements and not have predetermined, out of date ideas that do not suit industry e.g. stating set log book hours for everyone regardless of their skill levels.
Firstly, Improve the VET knowledge of registered assessors. It is these people who are making the licensing decisions. Having met many of them in the capacity of an RTO manager before starting with this industry employer, I can say that many should be required to re-sit Cert IV TAE. Basic understanding of VoC requirements as well as actual responsibilities of a Trainer or Assessor should be the first priority. Many do not have the skills to be good trainers. Just because a person has been a scaffolder or rigger for X amount of years does not make the person a good trainer. However, WorkSafe who accredits them is only interested in their past experience, not in their capability as a trainer or assessor. Many WorkSafe Assessors feel they are entitled to huge payments because they have that accreditation. This makes extending the duration of training courses an unviable option. The realm of HRW Licensing should be under one regulator, not multiple. This is just the surface and it hasn't even been scratched yet! I have many thoughts on this and the advantage of being able to look at the situation from the sides of an RTO and as an Employer organisation. I personally would like to see that Scaffolding and Rigging be a minimum of 3-4 weeks training though many employers would disagree because of costs. In its current form the only one making money is the Registered Assessors and I've already questioned their VET knowledge and skills. One of the questions, in this survey asked about the skills of new employees. The question should also include the underpinning knowledge and practical application of it. Most scaffolders and riggers, even those in industry for many years, cannot demonstrate knowledge during a VOC assessment yet can show the skills. Let's face it, anyone can use a spanner. More time should be allocated to both (useful) knowledge and skills if it wasn't spent on things they are unlikely to use once they are licensed. I would welcome the opportunity to be part of a working group to instigate change, but alas, I was on one with WorkSafe NT looking at crane assessment in 2014. This only resulted in a rehash of the same problems.
Fit for purpose independent regular auditing and engagement programme of RTOs that deliver HRWL. Candidate must have some level of work place experience through mentoring or buddy programme before being able to be engaged by RTO to be trained and receive licence.

Q31. Do you have any other comments about how HRWL training can be improved?
Follow-up: Operator Log book to record type and frequency of using their skill. Bring in a trainee or mentoring (basic level) and an open level with EWP, Crane operators & Doggers/Riggers. The VoC also needs to be sent to WorkSafe to add to the profile of the operator and a scan of the scab/ of the log book should also be included with the VoC to WorkSafe.
For Scaffolding I think we should revert back to the old system where a Licensed Scaffolder could have a few unlicensed people in their team. After enough practical and theoretical experience they can then be examined to gain verification of the competency level they have achieved and if achieved the appropriate licence be issued.
Further practical experience prior to issuing the licence
Give VOC when completing ticket
Have more training facilities in the regional centres. The local Institute of Technology only run courses if they have the numbers and you often find the course has been cancelled due to lack of numbers and their costs are too expensive. We have either been sending our employees to Perth or paying for a training company in Perth to send one of their trainers down to conduct the courses on our premises and to increase the numbers we enquire if any of our clients need any of their employees to complete the course we are running.
HRWL is not the answer, some one can go off for a day or two and be entitled to use the same machinery, should be hands on training
I have never experienced any personnel here onsite having to be retrained on their HRWL's. We require all our personnel to provide updated renewal's of their licences so we can maintain a correct record on our Training Management System. We conduct reviews with our personnel on a regular basis; this is an excellent time for personnel to request their next stage of High Risk training. We have a good and experienced group of personnel working here on site; all their training requirements are met.
I passionately believe that the logged hour's system should be introduced, having conducted audits for one of the largest miners on external RTOs for one of the largest miners I believe that accreditation is given by TAC far too easily. For example (CN) non-slewing crane should require 100 logged hours of operation before the HRWL is considered.
I see there is nothing about forklifts. Some RTOs are 2 days some are one. Manitous come under forklift tickets but they are completely different.
I think an independent VOC Cert should also be provided apart from the RTO within 3 months for the latest accreditation to be valid and new ticket sent out
I think that some level of experience should be gained before any licence is issued, such as a probationers licence until a certain amount of hours is achieved this could be verified by the employer.
I would like to have confidence that RTO's are not providing HRWL's when adequate skills have not been displayed. I also would not like to see industry shortening the duration of courses.
Ideally, onsite training would be the best for our business, as the student will be training in the environment they'll be working in.
Incorporate a category for demolition
Indentured apprentices under the age of 18 should be allowed to complete HRWL courses and gain qualification. In a lot of industries the HRWL is the bread and butter of the job, if the person cannot get the endorsement why employ them... We let them drive cars and motorbikes on the roads after all.....
Introduce a VOC that is standardised and minimum set assessment for each HRWL
Introduce training logbooks, encourage traineeships, incentivise employers to engage staff on traineeships.
Just need to ensure consistency across the whole of the country with respect to HRWL.
Mandate the level/s of underpinning knowledge required. Mandate that more advanced HRWLs take longer to achieve, and set the minimum time periods
Mandated hold points should apply at each level of competence to stretch the acquiring of tickets from basic to advanced to at least 12 months
My issue is the levels of practical experience currently required

Q31. Do you have any other comments about how HRWL training can be improved?
Needs to be delivered by people who have performed the work and are experienced in the work rather than those who simply hold a training qualification
Needs to be logged-booked, just like the IRATA (International Rope Access Trades Association), 1,000 hours must be completed on the job to be able to sit your next level of training, from Basic 1,000/Intermediate 1,000 to Advanced – actual in-depth training spending 80% of time building multiple scaffold scenarios. This needs to be standard from all RTOs, then and only then will you see an increase in skill and ability and the likelihood of someone seriously injuring or dying dramatically reduced.
Needs to be more relevant
People should have to have a period of on the job experience prior to being given a ticket of competency
Prescribed time in the field, similar to a traineeship. Log books would be a good start.
Quality training for high risk work licences comes down to the quality of the RTO selected to conduct the training and the quality of the relationship between the employer and the RTO. One key element in establishing an effective working relationship between employer and RTO is in developing a diagnostic tool which allows industry to make an objective assessment of an RTO for selection.
Reduce the cost of training.
Reduce the cost of training. It is very difficult to have more of our employees undertake HRWL training due to the cost.
Reduce the duplication in the Basic - to - Advanced and reduce the TIME spent on training. More practical, onsite assessments would be more beneficial in a workplace such as ours. ROT's to provide flexibility in offering VOC Assessment with employer equipment
Some of the training content seems to be irrelevant to the actual training, for example, what ID is required when applying for HRWL etc.
The course material provided at training is excellent, however most organisations skim over it and only complete the parts needed to pass the exam. Exams need to be closed book. It needs to be acceptable to fail a course regardless of the consequence on fees charged. Much more government monitoring of training providers is needed to weed out the rogue operators. People must gain experience at the basic level before advancing further. It is absurd that someone can hold an advanced rigging ticket and never been on a job. A more flexible system would be good for RPL for experienced staff whose ticket has lapsed or is not recognised in WA.
The HRWL system needs to go back to a Logbook process so people have time to gain the on the job experience, I did a three year Traineeship as a Rigger in 1985, We had to have 100 Logbook hours on every license we obtained, It took three years to get my RA, SA, Dogman, LF, EWP and C6 Crane, you had enough time to learn the skills and practice them. I have only recently come back to Mining after several years in Construction and the Standard of license holders is getting lower, How you can do two weeks of training and be an Advanced scaffolder doing Canter lever, Dropped scaffolds is a joke, I wonder how many people could actually set up a Gin Pole if we asked them to do them at a VOC, most people that I have VOC'd in construction could not even tell you the fleet angle of a winch if asked, I found the failure rate was high when working at places like Barrow island but sadly in the mining industry we have Fitters/boilermakers being Riggers and Crane drivers and they do not have the skill set of if they do, they lose it because they do not use the skills frequently enough
The lack of consistency across RTO's is a major problem and this will not be resolved by paperwork audits conducted by State or Federal departments. True audits should be done observing delivery by the trainers and observing the assessing of the participants on the various RTO HRWL programs. Any audits should also include a inspection of the training facility to see if the equipment and environment that the training is being delivered in is suitable to deliver real life work experience.
The training needs to be more regulated by WorkSafe and TAC/ASQA
The VOC process needs to be relevant to the skills being assessed; you cannot trust an RTO to conduct a VOC when they have provided substandard training in the first place. How about you put some secret shoppers through some courses to see how bad it really is out there

Q31. Do you have any other comments about how HRWL training can be improved?
There is very little Advanced Rigging that gets done in this day and age, however at least if someone has their advanced ticket there is no part of rigging they cannot do. So with a little supervision they are usually good to go even if they are fresh out of school.
There should be more allowance for recognized prior learning and courses modified in length of time and cost to reflect less time needed in training.
These licences should work just like a car licence where the individual is made fully accountable for their actions
Training Council should look at the individual needs of each region and separate from the metropolitan area. Provide more assistance and maybe assist with subsidies to the individual training Perth teachers, so it is attractive for them to come down to the regions rather than having training centralised in Perth. This increases dramatically the training costs for the student or the employer because of the extra accommodation, travel and extra time costs. Lack of training in the regions increases the danger of having untrained workers on site due to no choice (the job has to be done and risks are taken) or running the risk of having workers on site with fake licences.
Training providers should need to complete a register that allows business using their students to check all qualifications.
We are in an established industry in a small area and it is difficult to get training done. I have had one person booked for a course for eight months and because the numbers are not high enough the course keeps being delayed. He is a good competent employee but by law he should not be working with me. Can rural areas get more subsidy to enable smaller class sizes?
We do question that some RTO's pass everybody that walk through the door and set their training packages up to pass a VOC processes
With the correct education being given and also with the correct educated trainers.
With the VOC process the site specific aspects of a task can be covered. Part of the VOC is to have the candidate carry out a practical component which as a trainer and assessor it is fairly obvious after a practical whether the person has the desired skill set to carry out the task. As far as HRWL's go it is good the person has learnt the skills required but until a person has experienced those "OH SH!#" moments it would be difficult to say they were 100% skilled for the task. Compiling evidenced from thorough incident investigations involving high risk work would be advantageous in acquiring information related to the effectiveness and depth required of HRWL's.
Your questionnaire should have had the ability for comments on each answer as your multiple choices often were inadequate. Carrying out the VoC allows for picking up deficiencies and correcting them. 90% of the time there is a deficiency and 90% of the time common sense and a JHSA resolves the deficiency - hence the 80% success rate for the process. The 20% fail rate is the contractor or trainer's responsibility to resolve not ours. Regarding EWP's, there are so many low cost imported machines now on the market, that the lack of Australian Standards will lead to higher risk activities being carried out and higher likelihood of things going wrong. One of the big issues we see is that joystick controls in particular in the EWP basket are not safe when forward motion on the controls can cause an upward movement of the basket. This is common on imported machines today and can be the cause of fatalities when someone accidentally leans forward on the controls causing the basket to rise in an uncontrolled manner.