



GOVERNMENT OF
WESTERN AUSTRALIA

High Risk Work Licences

Strategic Industry Audit Report

Final Report
May 2024

TWD/D24/0091093



Training Accreditation Council
WESTERN AUSTRALIA

Strategic Industry Audits of units of competency leading into High Risk Work Licences

The Training Accreditation Council's (TAC or the Council) *Focus on Quality: TAC Regulatory Strategy 2021-2023* (the Strategy) identified units of competency leading to high risk work licences (HRWL units) as an area of focus and endorsed a strategic industry audit (SIA) of registered training organisations (RTOs) that deliver HRWL units in Western Australia (WA).

In scoping the HRWL SIA the TAC Secretariat consulted with key stakeholders, including the:

- Department of Energy, Mines, Industry and Regulatory Services (DEMIRS);
- Department of Training and Workforce Development (DTWD);
- Australian Skills Quality Authority (ASQA);
- Victorian Registration and Qualifications Authority (VRQA);
- relevant WA training councils; and,
- other relevant government agencies and peak bodies.

The SIA was endorsed based on a number of issues identified through industry regulator and stakeholder consultation including:

- the amount of training;
- meeting the requirements of the training package;
- assessment, including recognition of prior learning (RPL);
- vocational competency and industry currency of trainers and assessors;
- facilities and equipment;
- third party agreements;
- industry engagement; and
- information provided to prospective learners and RTO marketing.

The SIA was conducted between **February 2023 and May 2023** and involved **TAC RTOs** with one or more of the following **units of competency** (and relevant superseded units) on their scope of registration:

- *TLILIC0003 Licence to operate a forklift truck*¹
- *TLILIC0005 Licence to operate a boom-type elevating work platform (boom length 11 metres or more)*²
- *CPCCLDG3001 - Licence to perform dogging*³
- *CPCCCM3001 Operate elevated work platforms up to 11 metres*⁴
- *TLILIC0018 - Licence to operate a non-slewing mobile crane (greater than 3 tonnes capacity)*⁵.

RTO selection for the SIA was based on a range of factors including, third party arrangements and audit data analysis. Based on this analysis and the range of issues identified by stakeholders, the following clauses were identified for audit:

- Standard 1 - 1.1, 1.2, 1.3, 1.5, 1.6, 1.7, 1.8, 1.8a, 1.8b, 1.13, 1.14, 1.15
- Standard 2 - 2.3, 2.4
- Standard 4 - 4.1e, 4.1f, 4.1
- Standard 5 - 5.1, 5.2

Student surveys were conducted to obtain insights into RTO practices and student training experience.

¹ Superseded by *TLILIC2001 Licence to operate a forklift truck*

² Superseded by *TLILIC2005 Licence to operate a boom-type elevating work platform (boom length 11 metres or more)*

³ Superseded by *CPCCLDG3001A Licence to perform dogging*

⁴ Superseded by *CPCCCM3001C Operate elevated work platforms up to 11 metres*

⁵ Superseded by *TLILIC0008 Licence to operate a non-slewing mobile crane (greater than 3 tonnes capacity)*

Key findings of the SIA

The HRWL SIA did not identify any systemic issues and the concerns expressed by stakeholders were not evident in relation to the TAC RTOs audited.

The overall findings indicate that RTOs are meeting the requirements of the training package and ensure industry expectations are met in training delivery and assessment.

The HRWL SIA results indicate:

- 100% compliance at main audit or following the rectification period;
- there was an improvement in compliance in the five units (or relevant superseded units) audited *during* the SIA when compared to audit outcomes *before* the SIA (**Table 1.0**); and,
- student survey results confirmed overall audit findings and indicated that of the students that responded, the majority 88% (341 of 358) rated their satisfaction with training as 75 or above (on a scale from 0 to 100).

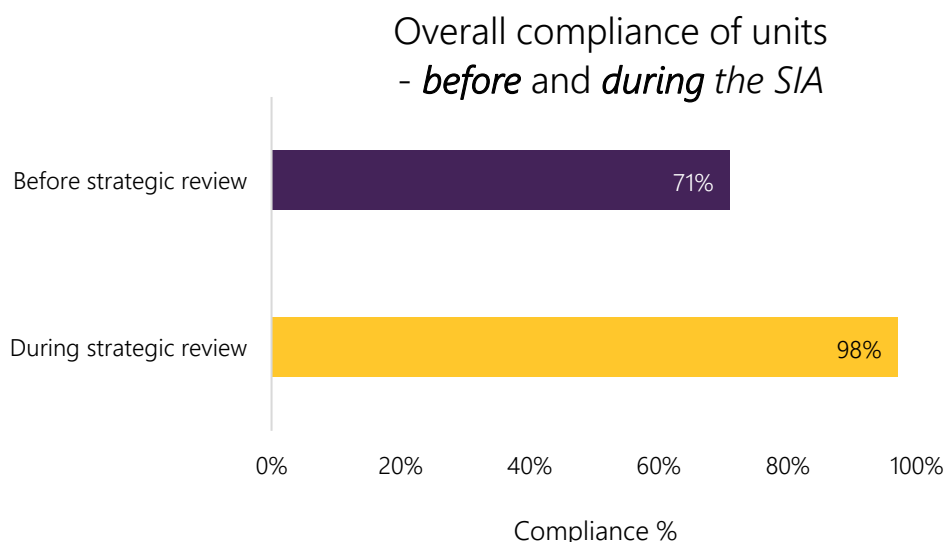
While the audits did not identify systemic issues, the Council will continue to engage with DEMIRS to ensure early detection of concerns with RTO training and assessment practices and ongoing monitoring of the sector.

HRWL Units and Audit Outcomes

Overall compliance of units *before* and *during* the SIA

Analysis of the five units (including superseded units) included in the SIA was conducted to compare overall compliance *before*⁶ and *during*⁷ the strategic review. The purpose of this comparison is to identify if overall compliance has improved over time. **Table 1.0** below provides an overview of compliance of units *before* and *during* the SIA.

Table 1.0 Overall compliance of units before and during SIA



- Audit outcomes from *before* the SIA (between 1 July 2018 – 31 December 2022) indicates that 71% of all audits of the relevant units were compliant.

⁶ RTOs with the relevant CPC and TLI training products on scope of registration subject to audits between 1 July 2018 - 31 December 2022 are identified as 'before strategic audit'. Before audit data includes outcomes from all audits including applications and monitoring.

⁷ RTOs audited in the conduct of the CPC and TLI SIA are referred to as 'during strategic audit'. During audit data includes outcomes from monitoring audits only.

- There was improvement in compliance of the five units (and superseded units) audited *during* the SIA when compared to audit outcomes *before* the SIA.
- Of the five units audited *during* the SIA, 97% were found to be compliant compared to 71% *before* the SIAs.

Compliance of Clauses

Non-compliances identified *during* the SIA were compared with data *before* the SIA to investigate if non-compliances found *during* have improved on previous levels.

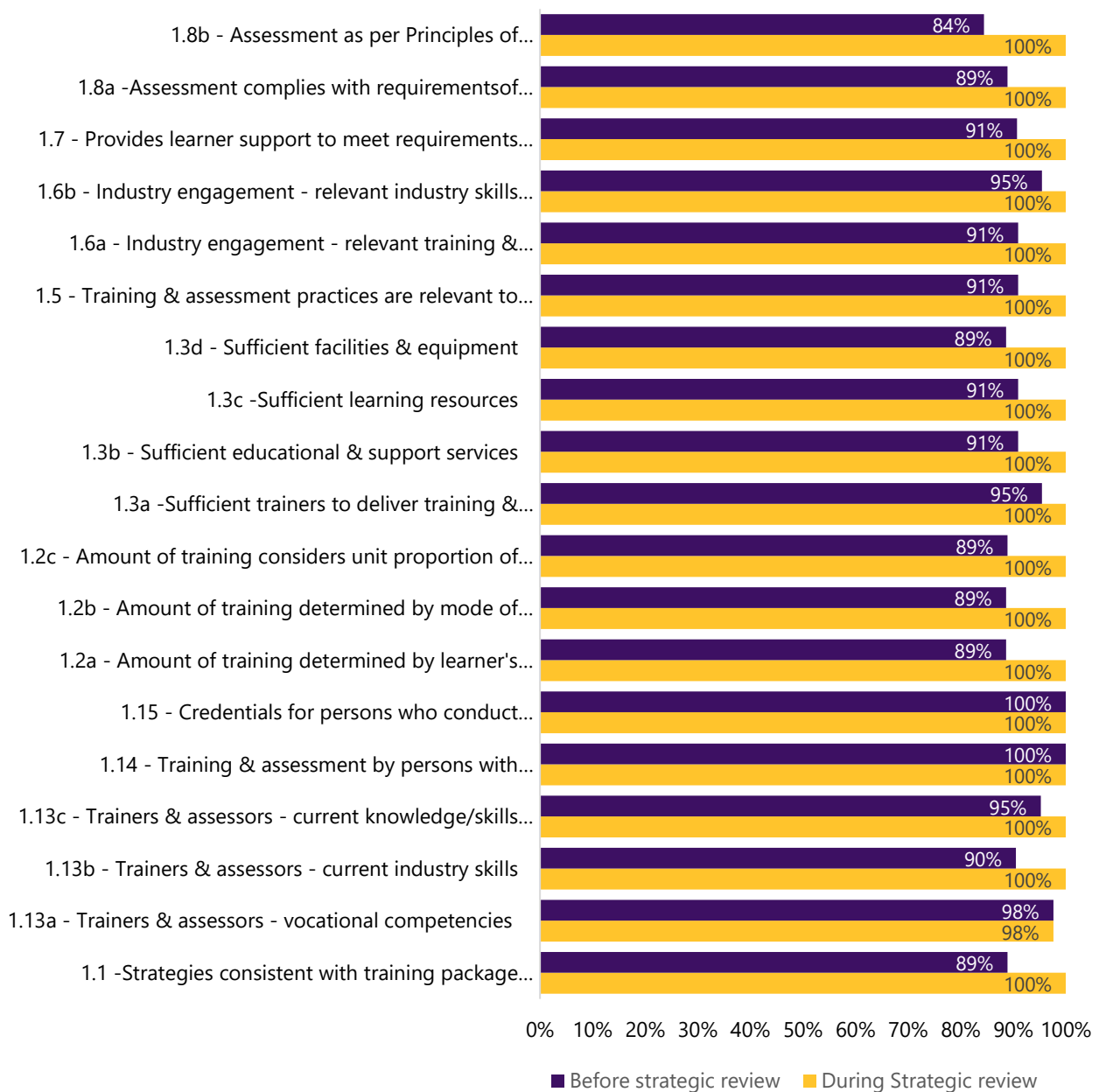
The SIA focused on Clauses 1.1, 1.2, 1.3, and 1.8, While levels of compliance were reasonably high, these clauses were all below 90% compliance in the period from the 1 July 2018-30 June 2022 period.

The SIA focused on the following areas:

- **Learners' needs**, including how the RTO provides advice to prospective learners about the training product to meet the learner's needs; and how the RTO determines learners' language and literacy (LLN) needs to support them to meet the requirements of the HRWL units.
- **Timeframes for training and assessment**, including length of each program of training, amount of training allocated per learner and support provided by trainers and assessors to learners.
- **Consistency of training** and meeting training product requirements.
- **Assessment practices** including:
 - **Recognition of Prior Learning**, evidence used by trainers and assessors to make judgements about competency of learners – how they ensure authenticity and sufficiency; and,
 - the use of **National Assessment Instruments** as the assessment tool for the unit of competency, and that where gaps exist between the NAI and the unit of competency, the RTO assessment meets the unit requirements.
- **Vocational competencies of trainers and assessors**, including processes used by RTOs to determine trainers and assessors have appropriate vocational skills and industry currency.
- **Engagement with industry**, including how training and assessment practices are relevant to and informed by industry and how trainers and assessors maintain industry currency.
- **Third party arrangements**, including evidence of third party agreements and strategies to monitor third parties (where applicable).
- **VET Delivered to Secondary Schools (VDSS)** arrangements, including tracking files of student progress (where applicable).
- **Marketing**, ensuring accurate and accessible information about the RTO services and performance is available to inform prospective and current learners and clients; including the support services offered by the RTO.

Results *during* the SIA:

- Clauses 1.1, 1.2, 1.3, and 1.8, were **fully compliant** (100% compliance) across all audits (**Table 2.0**).
- Additionally, *during* the SIA, Clause 4.1 (accurate & accessible information), Clause 5.1 (Learner informed of training product) and Clause 5.2 (Learner information and protection) were audited, and all clauses were 100% compliant.
- Given the level of compliance at main audit during the SIA no systemic issues are identified.

Table 2.0 Compliance of Standard 1 Clauses *before* and *during* the SIACompliance of Standard 1 Clauses **before** and **during** the SIA

Student Surveys

Student surveys were conducted to seek feedback on training experiences and confirm audit outcomes. Survey questions sought to determine:

- Whether information provided at enrolment matched the reality of services provided;
- learning needs were discussed, e.g. language, literacy and numeracy (LLN) and the type of support that would be provided;
- how training was undertaken (mode of delivery);
- information provided about assessment;
- number of hours/days that training was provided;
- trainers and assessors demonstrated current knowledge of skills in the industry;
- currency and relevance of learning resources, facilities and equipment; and
- whether sufficient advice was provided about RPL.

Overall satisfaction with training

Of the 7305 surveys distributed, there were **434** responses (6% response rate⁸) received. While the response rate is not statistically significant, overall, satisfaction with training was positive.

358 respondents provided free text responses describing their experience with the training provider.

Of the students that responded, the majority (88%) rated their overall satisfaction with training as 75 or above (on a scale from 0 to 100).

Summary of findings

Overall key findings of the SIA indicate that for those audited, TAC RTOs are meeting the requirements of the training package and ensuring industry expectations are met in training delivery and assessment.

A summary of key findings from the HRWL SIA is provided below.

- **Consistency of training and assessment practices** - RTO learning and assessment strategies demonstrated a sound basis for the delivery of training and assessment services. Assessment strategies were thorough and augmented to ensure unit requirements were met, including:
- **Recognition of Prior Learning** – the evidence provided by RTOs indicated assessment requirements of the unit are conducted in accordance with the Principles of Assessment and Rules of Evidence, and RTOs have established means to undertake RPL assessments that are consistent with assessment practices; and
- the use of **National Assessment Instruments (NAIs)** - RTOs demonstrated the use of the most recent version of the NAIs and provided evidence of assessment mapping and supplementary assessments to demonstrate all requirements of the unit are being assessed.

Timeframes for training and assessment - RTOs provided evidence that timeframes for delivery of HRWL units were commensurate with unit requirements and reflected the experience of the students. RTOs provided training and assessment strategies which detailed the mode of delivery and amount of training relevant to the respective HRWL unit outcomes and skills of the learner cohort. RTOs indicated that additional time may be provided for learners who require further assistance.

Meeting learners' needs - RTOs identify the learner's prior knowledge, skills and experience relevant to the respective HRWL unit and identify information about potential learner needs (including LLN) prior to commencement. Details of in-house and external support services that can be accessed if required was provided and RTOs may offer small class sizes.

Vocational competencies of trainers and assessors - RTOs demonstrated that 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, and current knowledge and skills in vocational training and learning that informs their training and assessment. Ongoing professional development is maintained, and competencies are documented in the trainer and assessor matrices.

Engagement with industry - RTOs demonstrated training and assessment practices that are responsive to industry needs and that meet requirements of the training package. Records of industry engagement and consultation was provided to show that trainers and assessor have strong links with industry. Training facilities reflected the small classes offered (where relevant) and equipment reflected current industry standards.

⁸ Statistically significant sample (over 365 respondents) based on a confidence level of 95% and a 5% margin of error.

Third party arrangements - RTOs hold third party agreements, distinguish where training and assessment is undertaken on their behalf and provide evidence of resource checklists to confirm access to the required plant, equipment and facilities.

VET Delivered to Secondary Schools (VDSS) - Two RTOs in the SIA provided HRWL training to secondary students and there were no issues identified through the audits.

Marketing - RTOs provided accurate, accessible and comprehensive information about services including learner educational and support services, name and contact details of third-party arrangements, and information related to fees and refunds. These are made available to prospective and current learners and clients through promotional materials, RTO website and learner handbooks.