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Safe Work Australia response to VET discussion paper – Quality of assessment in vocational education and training

Safe Work Australia is an independent statutory agency with primary responsibility to improve work health and safety (WHS) and workers' compensation arrangements across Australia. It is a tripartite body representing the interests of the Commonwealth, states and territories as well as workers and employers in Australia.

As a national policy body, the agency does not regulate WHS laws. The Commonwealth, states and territories retain responsibility for regulating and enforcing WHS laws in their jurisdiction.

The vocational education and training (VET) sector plays a key part in delivering strategic outcomes of the *Australian Work Health and Safety Strategy 2012-22* (Australian Strategy) relating to WHS skills and training. The Australian Strategy is a 10 year framework for national collaborative action to improve work health and safety across Australia. The strategic outcomes for the *health and safety capabilities* action area in the Australian Strategy are that workers have the WHS capabilities they require, those providing WHS education, training and advice have the appropriate capabilities and WHS skills development is integrated effectively into relevant education and training programs.

WHS training is of particular significance as there are prescribed courses in the model WHS Regulations developed by Safe Work Australia. These qualifications are used by WHS regulators to set minimum safety standards and competencies of workers undertaking high risk activities in workplaces, which leads to a licence being issued and accreditation recognised nationally. The types of work which require a licence are described in Schedule 3 of the model WHS Regulations – High Risk Work Licences and Classes of High Risk Work.

The prescribed courses in the model WHS Regulations recognise the importance of quality training as an underpinning principle in providing skilled workers, and that the most effective form of training is a combination of informal and formal training methods. It requires training and assessment to be undertaken by Registered Training Organisations (RTOs) under the Australian Skills Quality Authority (ASQA).

Licensing for High Risk Work (HRW) has a long history in Australia. The classes of work contained within Schedule 3 of the model WHS Regulations date back to 1991 and beyond. At that time, the licensing of particular classes of work was achieved through the adoption by states and territories of the then *National Certification Standard for Users and Operators of Industrial Equipment (NOHSC 1006)*. The National Certification Standard was replaced in 2006 with the *National Standard for Licensing High Risk Work* (the Standard). While the Standard provided a refreshed approach to training and assessment, the licence classes within the Standard remained essentially the same as those agreed in 1991.

The Standard 'facilitates the operation of a nationally uniform, competency based licensing system for persons performing certain types of high risk work' and was adopted in Part 4.5 of the model WHS Regulations.

HRW is defined in the model WHS Regulations as 'any work set out in Schedule 3 as being within the scope of a High Risk Work licence'. The aim is to ensure that persons have the skills and knowledge (competency) required to perform any prescribed HRW safely.

Schedule 4 of the model WHS Regulations lists the 29 aligned units of competency required for a HRW licence. These units of competency were established and maintained by the former relevant industry skills council (ISC) under the VET legislative framework.

The national HRW licensing system includes:

- a) developing and maintaining:
 - i) 29 units of competency
 - ii) 29 national assessment instruments (NAIs)
 - iii) a guide for accredited assessors, and
- b) the accreditation of assessors and administration of HRW licences (including issue and renewal) by WHS regulators.

HRW licensing spans both WHS and VET legislative frameworks. In 2012 the Council of Australian Governments (COAG) agreed to training package reforms including a requirement that all training packages and the 29 units of competency would be revised by ISCs by December 2015. Some of this work remains outstanding and it is understood that under the new VET model these revisions will be completed.

Safe Work Australia Members have raised concerns about poor quality training being delivered for general construction induction (White Card), HRW licences and asbestos removal licences. Poor quality training was also identified in the ASQA review report *'Training for the White Card for Australia's Construction Industry'* (December 2013).

Safe Work Australia Members have identified online training and assessment delivery (e.g. quality of online training, identity verification and course duration) as some of the issues that are contributing to poor outcomes for a number of other WHS training areas, particularly those associated with licensing under the model WHS laws. The discussion paper acknowledges that these issues occur across the VET sector however, the focus of the discussion paper is on the assessment of training rather than its delivery. The proposed strengthening of the assessment role does not address the issue of poor quality training delivery.

Safe Work Australia supports measures for a robust training and assessment framework to build confidence in the VET sector, including improving the monitoring and enforcement capability of ASQA.

Safe Work Australia is committed to working with ASQA and the Department of Education and Training to progress changes that may improve quality training outcomes.