



Australian Government

Australian Skills Quality Authority



REPORT

Training for the White Card for Australia's Construction Industry

A national strategic review of registered training organisations
offering industry induction training - the White Card



20 September 2013

Letter of transmittal



The Hon Ian McFarlane MP
Minister for Industry
Parliament House
Canberra ACT 2600

Dear Minister

We are pleased to provide the report of a national strategic review of general construction industry training (the White Card) that was undertaken by the Australian Skills Quality Authority (ASQA). The White Card is required by all persons wishing to work on a construction site in Australia and is issued following mandatory training.

This strategic review was initiated by ASQA Commissioners because of the serious concerns raised by stakeholders about the quality of training and assessment for the White Card and, in particular, whether new entrants to the construction industry were receiving the necessary work health and safety skills through the White Card training.

This national strategic review relied on audits of registered training organisations, surveys of registered training organisations and stakeholder feedback for its findings. The key findings were: most training was delivered online resulting in inadequate arrangements to ensure the person undertaking the assessment was the person issued with the White Card; delivery in many cases, particularly online was too short to allow for adequate training and assessment; most registered training organisations assessed knowledge and not skills; and some registered training organisations delivering 'face-to-face' are leaving the market because they cannot compete with registered training organisations delivering online.

This strategic review was guided by a management committee drawn from key stakeholders comprising the construction industry, industry skills councils, employer associations, unions and government and was chaired by ASQA's Chief Commissioner. ASQA's Commissioners are very grateful for the invaluable contribution of the management committee both collectively and individually.

Key recommendations of the strategic review of White Card training address the need for:

- ASQA to continue to give high priority in its on-going regulatory activities to White Card training and assessment and, in collaboration with the Construction and Property Services Industry Skills Council (CPSISC), to conduct national workshops to explain and reinforce the key findings of this review;
- ASQA, within 12 months of the workshops, conduct a series of audits to evaluate whether training and assessment has improved and the concerns of stakeholders have been addressed;
- the Construction and Property Services Industry Skills Council (CPSISC) in collaboration with industry and work health and safety regulators to redevelop the unit of competency for the White Card to address assessment and length of delivery concerns identified as a result of this strategic review; and
- the National Skills Standards Council, in its review of the standards for the national regulation of VET, to address the issues of identity validation and assessment identified as a result of this strategic review.

ASQA considers the implementation of the strategic review's recommendations will strengthen considerably the quality of training and assessment for the White Card provided to learners. This is particularly important not only for the integrity of the VET sector but also for health and safety of construction workers.

We commend this report to you and its recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Robinson'.

Chris Robinson
Chief Commissioner

A handwritten signature in black ink, appearing to read 'Dianne Orr'.

Dianne Orr
Deputy Chief Commissioner

A handwritten signature in black ink, appearing to read 'Michael Lavarch'.

Michael Lavarch
Commissioner





Key messages

White Card training for the construction industry in Australia has been mandated in recognition of the high-risk nature of construction work. Projected employment growth of 12% by 2016-17 indicates that there will be an additional 131 200 workers who will require this mandatory entry-level work health and safety training

There is great variety in state requirements for work health and safety regulation

Most registered training organisations have difficulty complying with assessment requirements

Following time to rectify areas where they were not compliant, over two-thirds of registered training organisations became compliant with the national standards. However, all registered training organisations delivering and assessing training online continued to be not compliant

Training programs delivered online are largely too short and without time in a workplace for sufficient skills development, also raising quality concerns about student identification verification

Changes to the national standards for training organisations are required

A more consistent national approach to work health and safety regulation regarding General Construction Induction training is required



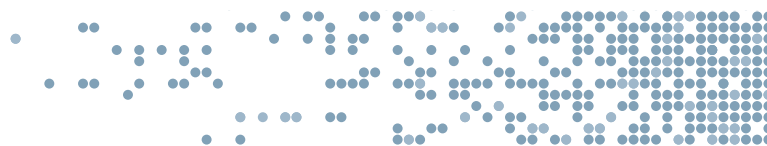
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Executive summary

The Australian Skills Quality Authority (ASQA) undertakes strategic reviews that conduct in-depth analysis of a particular issue, sector, qualification or method of delivery when a risk has been identified to the quality of training and assessment. The focus is on examining systemic poor practice and identifying appropriate actions to address the poor practice across the system.

This strategic review has been initiated as a result of concerns raised by industry with ASQA regarding the quality of training and assessment provided by some registered training organisations (RTOs) offering the entry-level occupational health and safety training required to commence work on construction sites in Australia. Once people have successfully completed training in the unit of competency CPCCOHS1001A *Work safely in the construction industry* (see Appendix A), they can be issued with a General Induction Training Card, commonly known as the White Card. This induction safety training is mandatory for all persons working on construction sites in recognition of the high-risk nature of construction sites.

Persistent stakeholder concerns focused on:

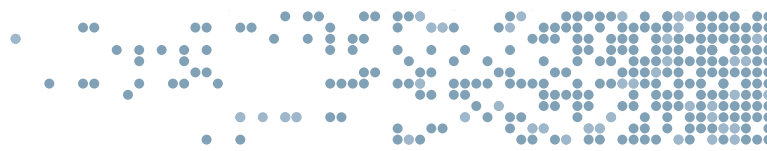
- the poor quality of general construction induction training programs of short duration, particularly in relation to lack of construction industry context, inadequate assessment of communication and comprehension skills, and failure to meet the learning needs of people with language and literacy issues;
- the risk of identity fraud in online training due to inadequate verification of people's identity; and
- employer concerns that many people presenting for work on construction sites with a White Card do not have the required workplace health and safety skills.

These concerns cast doubt on whether people issued with White Cards are actually competent to work safely on construction sites.

The review was guided by a management committee comprising ASQA and key stakeholders: the Construction and Property Services Industry Skills Council; the Master Builders Association; the Housing Industry Association; the Construction, Forestry, Mining and Energy Union; and the then Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education.

It was found in this review that:

- most RTOs are only assessing knowledge and not skills;
- most training is delivered online;
- there are not adequate arrangements in place to ensure the online assessment is actually being done by the person enrolled in the training for the White Card;
- training and assessment is mostly completed in less than four hours, with some programs completed in under an hour. Some RTOs provided no actual training, but provided only a knowledge test; and
- some RTOs delivering through face-to-face training and assessment are leaving the market because they cannot compete with the RTOs offering delivery of White Card training and assessment online.

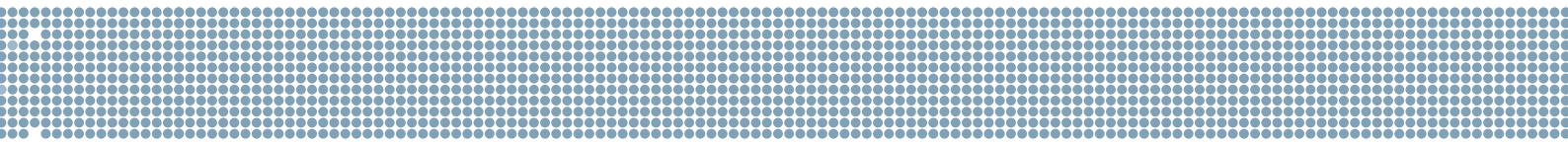


For the purposes of this review:

- the views of stakeholders were sought, including employers and unions, work health and safety regulators and RTOs;
- the scale and nature of delivery was derived through a survey of 851 RTOs of which 593 advised they deliver the unit of competency CPCCOHS1001A *Work safely in the construction industry* and 456 replied that their primary purpose in delivering the unit was to enable people to receive the White Card; and
- the quality of delivery and assessment of 63 RTOs delivering the unit of competency CPCCOHS1001A *Work safely in the construction industry* was analysed through audits of RTOs that had that unit of competency on their scope of registration. Forty-seven RTOs were audited specifically for this review and the remaining 16 were registration audits conducted as part of ASQA's usual regulatory functions. The audits focused on selected standards within the *Standards for NVR Registered Training Organisations 2012*.

The findings of the review have confirmed the concerns of stakeholders, identifying significant deficiencies in some RTOs' delivery and assessment of White Card training. These findings include:

- a lack of confidence among many stakeholders, including industry and some work health and safety regulators that the current program is achieving its safety objective due to concerns about the quality of White Card training and assessment;
- most people who receive a White Card complete an online program with a small percentage of providers and many who complete the program, particularly online, do so in a significantly shorter time than the six hours recommended by the Construction and Property Services Industry Skills Council, casting doubt on whether they are competent in the required skills:
 - of the 47 RTOs sampled for audit in the review, 12 were found to deliver and assess online. In 2012, the 12 RTOs using the online method delivered 121,072 or 95.0% of the total 127,392 White Card programs that were delivered by the 47 RTOs in the audit sample
 - of all the RTOs using online delivery (14 out of the 63), 100% were found to have training and assessment strategies with a duration of four hours or less. However, through evidence sighted at the audits, most people doing their White Card training in the online method were found to complete the training and assessment in less than one hour.
- the majority of RTOs that were audited were compliant with most of the training and assessment standards but 74.6% of RTOs were not fully compliant with the standard relating to assessment practices, at the initial audit, even though this rate of non-compliance is expected to fall to 27.7% following the completion of rectification actions by RTOs to address the non-compliances identified at the initial audit; and
- the risk to achievement of the safety objective is compounded by the potential for identity fraud because identity verification in the very large number of online White Card programs is not assuring that the person completing the assessment is the person who receives the White Card. The use of an "accredited third party" to verify the identity of the person sitting the assessment appears to provide the strongest assurance of identity if online delivery and assessment is to continue.



It is clear that in order to systematically address the issues identified, a concerted and collaborative effort will be required by a number of stakeholders and agencies that have a responsibility for and investment in the White Card arrangements. Maintaining the status quo is not an option given the serious concerns about risks to safety. Nevertheless, through the consultations that occurred in this review there is the will and commitment to maintain the White Card but with changes to the arrangements to ensure that it achieves its objective of preparing people to work safely on construction sites.

As a first response to the review, ASQA has requested, in accordance with its usual regulatory processes, that all RTOs found during the review to be not compliant with the standards, provide evidence of rectification. Where any non-compliance remains, ASQA will take further regulatory action including imposing sanctions.

The recommendations focus on achieving change in the key areas that are undermining confidence in the White Card.

The key areas for action are:

- industry, through the Construction and Property Services Industry Skills Council, to consider strengthening its requirements in relation to assessment and program duration through the training package where needed, especially where the training package requirements are unclear or ambiguous;
- work health and safety regulators to give consideration to more consistent requirements across Australia for White Cards to avoid the current variation of White Card arrangements that impact on the consistent quality of delivery of White Card training;
- the National Skills Standards Council to consider strengthening and clarifying the *Standards for NVR Registered Training Organisations* in relation to assessment and the requirements for validating the identity of those being assessed; and
- ASQA to treat White Card training as a high-risk area requiring greater regulatory scrutiny.

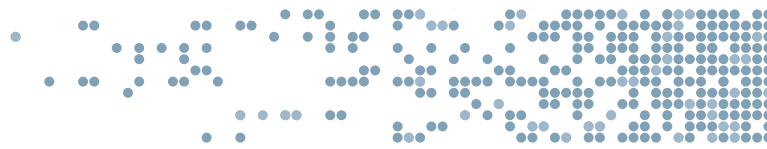
Recommendations

Industry improving assessment and program quality through training package requirements

All industry skills councils are required to review training packages by 31 December 2015 to comply with the 2012 *Standards for Training Packages*, which significantly strengthen the ability of an industry skills council to specify as mandatory elements of a training package, the performance evidence, the knowledge evidence and assessment requirements. It would be desirable if the review of the unit of competency CPCCOHS1001A *Work safely in the construction industry* was expedited to address the concerns found in this review.

Recommendation 1:

It is recommended that the Construction and Property Services Industry Skills Council give consideration to prioritising redevelopment of the unit of competency 'CPCCOHS1001A Work safely in the construction industry' to specify any mandatory requirements for performance evidence and a revision of any knowledge evidence requirements as soon as possible. This should include collaboration with industry and the work health and safety regulators.



RTOs in particular struggled with meeting the existing standards for assessment.

Recommendation 2:

It is recommended that the Construction and Property Services Industry Skills Council, in collaboration with industry and the work health and safety regulators, give consideration to including the following clear specifications of assessment requirements in the unit of competency 'CPCCOHS1001A Work safely in the construction industry':

- *the stipulation of any mandatory conditions for assessment, including any requirements for skills demonstration in a simulated workplace context;*
- *the specification of the conditions under which evidence for assessment must be gathered, including any details such as equipment and materials and physical conditions for assessment; and*
- *the specification of assessor requirements including any details relating to the qualifications and experience of assessors and their industry currency.*

Program duration

The findings of the review indicate that there is an extremely wide variation in the duration of programs that deliver the unit of competency CPCCOHS1001A *Work safely in the construction industry* and that short-duration programs make it difficult to meet the requirements of the unit of competency. Program duration is not specified in the training package but the Construction and Property Services Industry Skills Council's *Delivery and Assessment Guide 2012* does, however, recommend a duration of six hours of delivery. The state and territory work health and safety regulators do not have a consistent position on this matter. Some are silent, some recommend six hours and some require six hours. Greater clarity is needed. This lack of consistency has allowed a situation to develop where 58% of White Cards are now issued as a result of doing courses of fewer than six hours duration, and 70% of all White Cards issued in Australia are now issued in just two states, Queensland and Western Australia, where there are no minimum times required for White Card training. The diversity of arrangements set by work health and safety regulators across different jurisdictions appears to be contributing to very different quality in training arrangements for the White Card across Australia.

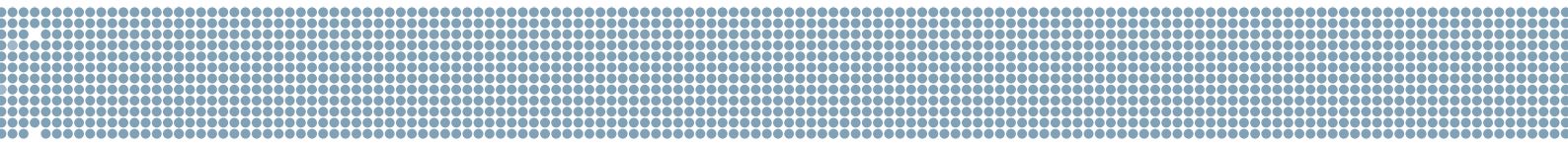
Recommendation 3:

It is recommended that the Construction and Property Services Industry Skills Council, in collaboration with industry and work health and safety regulators, give consideration to the inclusion of a minimum duration of training and assessment for the unit of competency 'CPCCOHS1001A Work safely in the construction industry' and making this mandatory unless the RTO can demonstrate that the needs of the target group can be met in less than the mandated duration.

The assessment standard

A failure to meet the requirements of the assessments standard by a significant number of providers, following the opportunity for rectification after non-compliances were identified at the initial site audit, is of significant concern.

The principles of assessment (fair, flexible, valid and reliable) and rules of evidence (valid, sufficient, authentic and current) that are included in the definitions section of the standards provide significant guidance to RTOs in relation to the practice of assessment, but either they are not aware of these or are not using them to inform their practice. These principles and rules need to be part of the Assessment Standard



for RTOs and a revision of this standard should be part of the national review of standards for RTOs that is currently being undertaken by the National Skills Standards Council. The problems with assessment go beyond specific action to review the assessment requirements of the White Card unit of competency. This is not just an issue for assessment of the White Card, but for the VET sector as a whole.

Recommendation 4:

It is recommended that the National Skills Standards Council give consideration to including in the revised Standards for NVR Registered Training Organisations an assessment standard that explicitly includes the principles of assessment and the rules of evidence (as they are currently defined in the definitions section of the Standards).

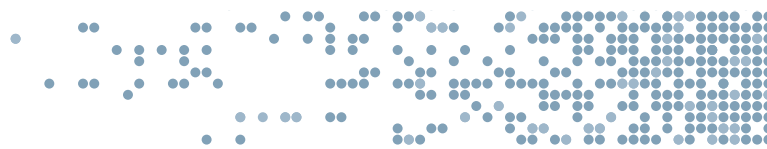
The new assessment standard should be along the lines of: assessment must be conducted by a qualified assessor according to the principles of assessment and the rules of evidence for assessment.

The principles of assessment are that:

- *assessment must be fair so that an individual candidate's needs and characteristics are considered in the assessment process, there is clear communication between the assessor and the candidate so that the candidate is informed about and fully understands the assessment process, and that the candidate is able to challenge the result of the assessment to the RTO and be reassessed if necessary;*
- *assessment must be flexible where the assessment draws on a range of assessment methods appropriate to the context and recognising the existing competencies of the candidate;*
- *assessment must be valid in terms of the assessment decision being based on evidence of performance by the candidate; and*
- *assessment must be reliable in terms of consistency between different assessors on the basis of the assessment evidence used, including that the precise assessment task or measurement instrument is appropriate and accurate to determine whether the candidate has the competencies being assessed.*

Assessment must be based on the collection of evidence to ensure that it is valid, sufficient, authentic and current as follows:

- *assessment evidence must be valid so that the assessor is certain that the candidate has the skills, knowledge and attributes as described in the relevant unit of competence;*
- *assessment evidence must be sufficient so that the quality and quantity of assessment evidence is adequate to ensure that all aspects of the competency have been met and that it can be demonstrated repeatedly;*
- *assessment evidence must be authentic so that the assessor can be assured that the evidence presented for assessment is the candidate's own work; and*
- *assessment evidence must be current to the extent that assessment is of current competencies.*



The issue of verification of identity

The findings of the review indicated that RTOs, particularly those delivering online, had inadequate procedures to ensure the person issued with the statement of attainment for the unit of competency CPCCOHS1001A *Work safely in the construction industry* is actually the person who completed the training. Standard 15.5 (b) requires that assessment must be conducted in accordance with the rules of evidence. One of these rules of evidence is authenticity, that is, that the assessor must be assured the evidence presented for assessment is the candidate's own work. This needs to be an explicit part of the standards. Advice received from the Flexible Learning Advisory Group is that the minimum acceptable level of verification is confirmation of identity by an "accredited third party" and that the confirmation be stored with the assessment results, and "the third party" must confirm the person is the student who registered for and completed the assessment.

Recommendation 5:

It is recommended that the National Skills Standards Council give consideration to, including in the revised standards, a specific requirement that RTOs validate the identity of every student's identity for the purposes of assessment by having it confirmed by an "accredited third party" and that the confirmation be stored with the assessment results, and the "third party" must confirm the person is the student who registered for and completed the assessment. These standards should state that to accept assessment evidence, an assessor must be assured that the evidence presented for assessment is the candidate's own work.

Driving systemic change in RTO practice

The systemic poor practices identified through this review indicate that many RTOs are not complying with the requirements of the unit CPCCOHS1001A *Work safely in the construction industry*, which demonstrates a clear need for them to improve their training and assessment services. Furthermore, it is apparent ASQA should continue to focus on the delivery of the unit of competency in its compliance activities.

Recommendation 6:

It is recommended that ASQA:

- *treat the unit 'CPCCOHS1001A Work safely in the construction industry' as a high-risk unit in its regulatory approach, meaning that ASQA will ensure any audit it conducts of an RTO offering this unit will include the unit as a mandatory requirement in the sample of the RTO's programs to be audited;*
- *undertake a round of national workshops, in collaboration with the Construction and Property Services Industry Skills Council, for RTOs delivering the unit of competency 'CPCCOHS1001A Work safely in the construction industry' once the revised national standards are settled to explain and reinforce the key findings of this review; and*
- *within 12 months of the workshops, conduct a series of audits targeting the delivery and assessment of this unit with a view to evaluating whether the quality of training and assessment has improved and the concerns of stakeholders have been addressed.*

Chapter 1

Introduction

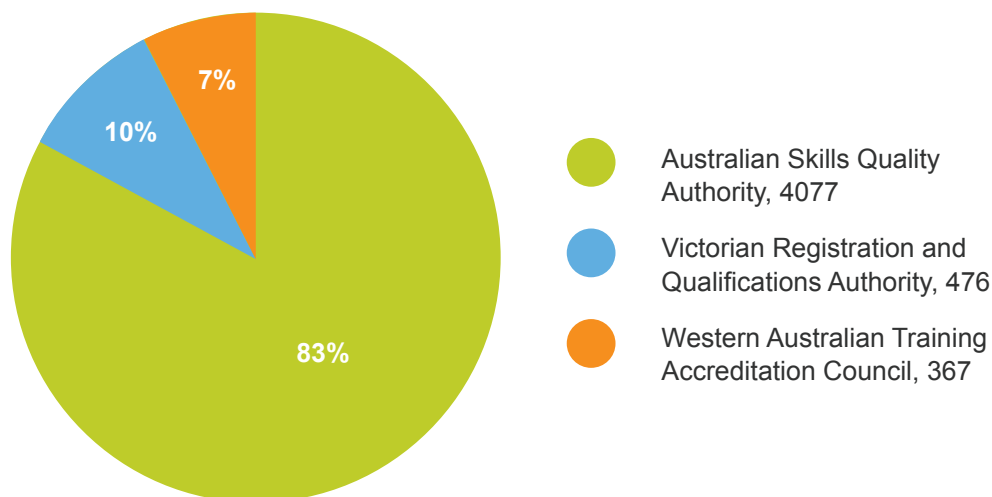
The Australian Skills Quality Authority (ASQA) commenced operations as the national regulator for Australia's vocational education and training (VET) sector on 1 July 2011.

ASQA regulates courses and training providers to ensure nationally approved quality standards are met so that students, employers and governments have confidence in the quality of vocational education and training outcomes delivered by Australian registered training organisations (RTOs).

ASQA is the regulatory body for RTOs in:

- the Australian Capital Territory;
- New South Wales;
- the Northern Territory;
- South Australia;
- Queensland;
- Tasmania; and
- for RTOs in Victoria and Western Australia that offer courses to overseas students and/or offer courses to students (including through offering courses online) in the Australian Capital Territory, New South Wales, the Northern Territory, South Australia, Queensland or Tasmania¹.

Figure 1: Number of RTOs registered by each regulator



Source: www.training.gov.au 30 March 2013.

¹ The **Victorian Registration and Qualifications Authority (VRQA)** is the regulatory body for registered training organisations that enrol only domestic learners and enrol learners in Victoria only (or in Victoria and Western Australia only). Western Australia's **Training Accreditation Council (TAC)** is the regulatory body for registered training organisations that enrol only domestic learners and enrol learners in Western Australia only (or in Victoria and Western Australia only).



ASQA's functions include:

- registering training providers as RTOs;
- registering providers that can enrol international students;
- accrediting VET courses;
- ensuring that organisations comply with the conditions and standards for registration, including by carrying out audits; and collecting, analysing and publishing information on the VET sector and VET providers.

RTOs that are registered with ASQA must comply with the VET Quality Framework which is comprised of:

- *the Standards for NVR Registered Training Organisations 2012;*
- *the Fit and Proper Person Requirements 2011;*
- *the Financial Viability Risk Assessment Requirements 2011;*
- *the Data Provision Requirements 2012; and*
- the Australian Qualifications Framework.

One of the three objectives in ASQA's 2011-2014 Strategic Plan is to *improve the quality of the VET system through regulatory intelligence and advice*. To achieve this objective ASQA has conducted three strategic reviews in 2012 and 2013 targeting training "hot spots" where risks have been identified to the quality of outcomes achieved by training delivery and assessment. ASQA strategic reviews conduct in-depth analysis of a particular issue, sector, qualification or method of delivery related to the quality of training and assessment. The focus is on examining systemic poor practice and identifying appropriate actions to address the poor practice across the system and not just to resolve issues with individual RTOs.

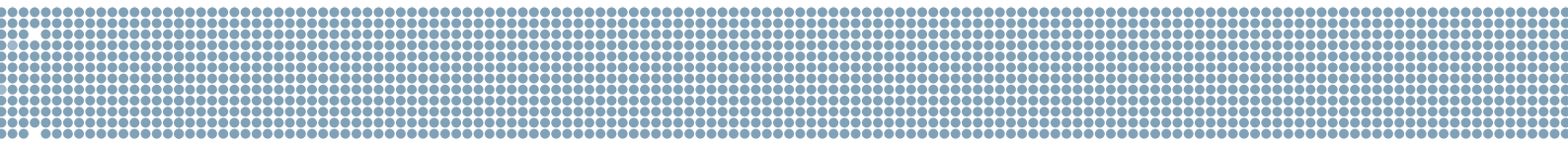
The three current strategic reviews are:

- VET in aged and community care;
- the entry-level occupational health and safety training required to work on construction sites in Australia, commonly known as the White Card; and
- marketing and advertising practices of RTOs.

In addition to identifying actions ASQA can take to best target its regulatory efforts, the timing is opportune for the outcomes of the strategic reviews to inform a number of related initiatives or reforms, which are underway in the VET sector including:

- the National Skills Standards Council's review of the standards for VET regulation, focusing on issues of quality
- the implementation of the 2012 *Standards for Training Packages* which now require Industry Skills Councils to specify assessment requirements to accompany every unit of competency; and
- the Industry Skills Councils' VET Quality Project, which is proposing that Industry Skills Councils should have the capacity to further define industry requirements relating to how training is delivered and assessed, as appropriate to a specific qualification/unit of competency and based on a suite of nationally agreed measures.

This strategic review was initiated as a result of concerns raised by industry with ASQA regarding the quality of training and assessment provided by some RTOs offering the unit of competency, CPCCOHS1001A *Work safely in the construction industry*, the White Card training program. Poor quality in this area has the capacity to compromise safety for workers on construction sites. These concerns particularly related to online delivery and assessment of the training for the White Card.



The review was established under the authority of the *National Vocational Education and Training Regulator Act 2011* to provide advice and findings about the efficacy of the delivery and assessment of the unit of competency, CPCCOHS1001A *Work safely in the construction industry* by RTOs.

The review has been guided by a management committee comprising ASQA and key stakeholders: the Construction and Property Services Industry Skills Council; the Master Builders Association; the Housing Industry Association; the Construction, Forestry, Mining and Energy Union; and the then Department of Industry, Innovation, Climate Change, Science, Research and Tertiary Education. The terms of reference included overseeing the work of the review, approving the methodology, overseeing the consultation, making findings about how RTOs should deliver and assess the required skills and reporting to ASQA on the findings.

Stakeholder concerns

Stakeholder concerns included that learning programs:

- are too short to give participants the knowledge and skills they need;
- lack construction industry context. While the unit is unusual in the VET system in that it cannot be assessed on an actual construction work site, it still requires the provision of workplace resources such as personal protective equipment. For example, a criterion of the unit is that students can demonstrate the use of this equipment;

Performance criteria 4.3. Requirements for the selection and use of relevant personal protective equipment are identified and demonstrated. (page 4 of the unit)

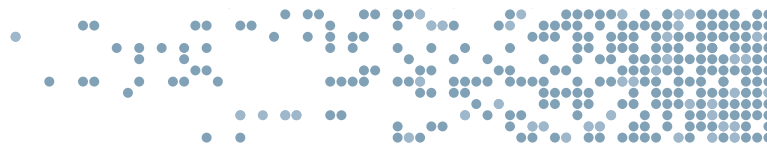
- do not adequately assess the communication and comprehension skills required by the training package. These skills require that students can *ask effective questions, verbally report hazards, and discuss OHS issues*;
- do not meet the learning needs of people with language and literacy issues; and
- are not meeting the specific requirements of the unit.

An additional and widespread concern was expressed about online delivery and assessment, with a potential for fraud due to inadequate validation of the identity of the participants that could result in significant compromise to the safety objectives of the White Card.

Throughout this report a reference to RTOs is a reference to those RTOs that are registered with and regulated by ASQA unless otherwise specified.

The background for the strategic review of White Card training is provided in Chapter 2 of this report. Features of current delivery are described in Chapter 3. Stakeholder perspectives are outlined in Chapter 4. A detailed analysis of the quality of White Card training is discussed in Chapter 5. Conclusions, actions underway and recommendations for further actions by ASQA and other agencies are set out in the final chapter with a view to informing and improving future practice in relation to White Card training so that it more effectively achieves its safety objectives.

The focus of this review has been on the applicable Part 3 of the *Standards for NVR Registered Training Organisations 2012*. It is important to note that there is also a Part 2 of the standards that sets out the requirements for those seeking to become a RTO. An excerpt of the standards has been included in Appendix D of this report to assist readers of this review.



Chapter 2 Background

In this chapter, background information is provided about the strategic review including:

- facts about the construction industry;
- the history and purpose of the White Card; and
- White Card regulatory arrangements.

2.1 Construction industry workforce

The construction industry has a workforce of 995,300, as estimated by the Construction and Property Services Industry Skills Council in its 2013 Environmental Scan.

Construction is the second largest industry gross value added contributor to Gross Domestic Product (GDP) within the Australian economy at nearly 7.8% in trend terms. The construction industry has a workforce of 995,300, which is the third largest workforce behind retail trade and health care employing over 8.6% of all Australian workers (CPSISC 2013, p18).

The Construction and Property Services Industry Skills Council notes that with a 12% increase in construction workers forecast by 2016-17, the nation will require over 127,000 additional workers across construction occupations. Taking the attrition of the ageing workforce into account there will need to be a very significant number of new entrants to the workforce to reach this number. Master Builders Australia estimates this at around 50,000 industry entrants per year. The Department of Education, Employment and Workplace Relations forecasts that the construction industry is projected to experience stronger growth with 131,200 additional workers to be employed in the industry by 2016-17.

Safe Work Australia has estimated the construction industry in 2010-11 as employing 1.02 million people, or 9% of the Australian work force.

There is significant growth forecast in the construction industry work force. All new entrants to the construction industry require completion of safety induction training prior to entry to a building site.

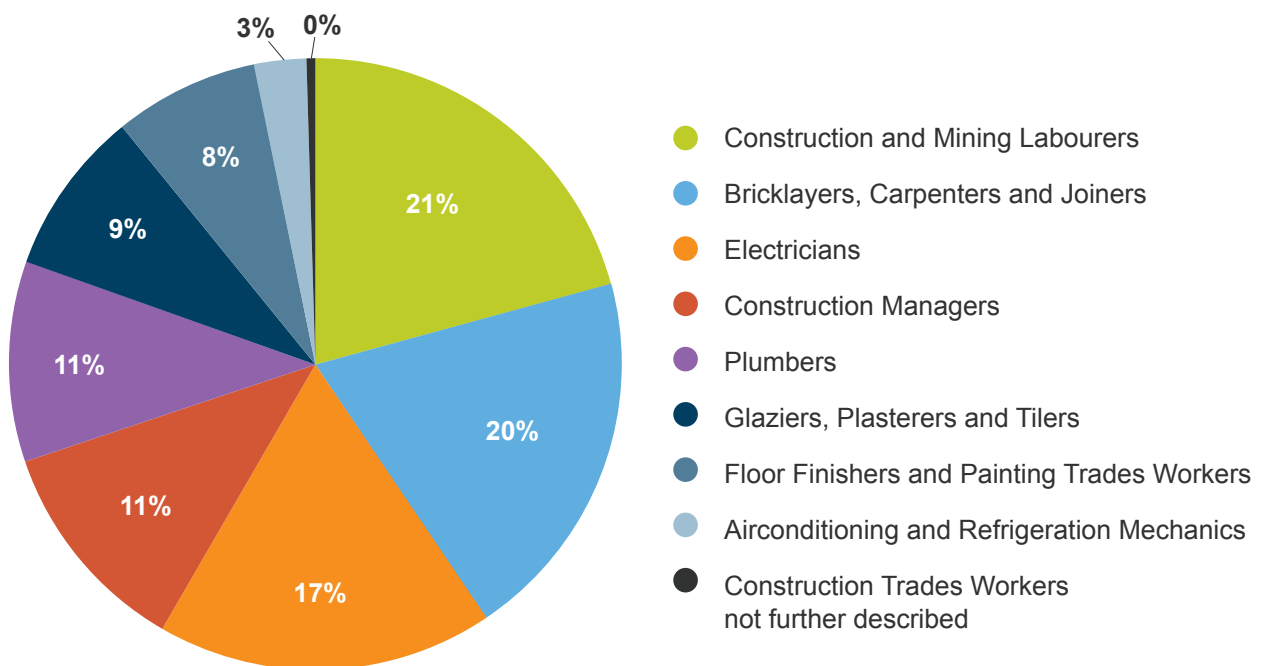
The composition of the existing construction industry workforce is shown in Table 1 and Figure 2. Well over half of the construction industry workforce are labourers, bricklayers, carpenters and joiners or electricians. As at the 2011 Australian Census, approximately one third of the construction industry was comprised of persons in administrative roles, including in human resources and contract drafting. These numbers are not captured in the data Table 1 and Figure 2.

Table 1: Australian construction labour force by occupation 2011

Occupation	Employees	
	Numbers	Proportion (%)
Construction and Mining Labourers	130,979	20.8
Bricklayers and Carpenters and Joiners	124,709	19.8
Electricians	110,712	17.6
Construction Managers	72,679	11.6
Plumbers	67,024	10.7
Glaziers, Plasterers and Tilers	54,649	8.7
Floor Finishers and Painting Trades Workers	48,460	7.7
Air-conditioning and Refrigeration Mechanics	17,492	2.7
Construction Trades Workers (not further defined)	2,403	0.4
TOTAL	629,107	100.0

*Source: Unofficial data extracted from Australian Bureau of Statistics 2011 Census Data collection on 25.6.2013.
Based on employees' usual place of residence.*

Figure 2: Australian construction labour force by occupation 2011



*Source: Unofficial data extracted from Australian Bureau of Statistics 2011 Census Data collection on 25.6.2013.
Based on employees' usual place of residence.*



2.2 Safety in the construction industry

Safe Work Australia has collated data on workplace accidents or incidents, which provides a background to the importance of preventative measures such as quality training for the industry, including with induction safety training. Of serious injuries resulting in a workers' compensation claim, 10.2% were from workers in the construction industry.

In the three years from 2008-2011, there were 123 fatalities in the construction industry workforce. In the period 2010-11 there were 112,570 claims for serious injury or illness involving construction industry workers.

The construction industry has mandated induction safety training for all construction workers, in recognition of the high-risk nature of construction work. Completion of the mandated training enables trainees to apply for a White Card, which must be presented to an employee prior to entry to a work site.

2.3 The White Card – safety requirements, past and present

Work health and safety is regulated by states and territories.

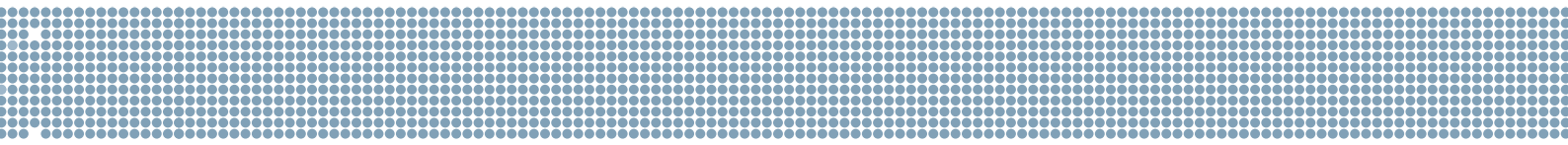
Since 2009 all states and territories have been working together to harmonise work health and safety laws to benefit employers and workers that operate in more than one state or territory. While new harmonised laws are still being progressively implemented across jurisdictions since January 2012 (with Victoria electing not to adopt the model legislation in its current form and Western Australia's adoption date yet to be determined), the *National Code of Practice for Induction for Construction Work* (Australian Safety and Compensation Council 2007) will ultimately be superseded by the *Model Work Health and Safety Regulations 2011* and the *Construction Work Code of Practice* (Safe Work Australia 2012), in jurisdictions that have implemented the harmonised work health and safety laws.

The *Model Work Health and Safety Regulations 2011* specify the requirement for general construction induction training. The *Construction Work Code of Practice* (Safe Work Australia 2012) states that the training must be delivered by an RTO. Upon completion of the training, the person may apply for a general construction induction training card, known as the 'White Card'. Hence the harmonised work health and safety legislative arrangements are continuing the mandatory White Card requirements. There is, however, one notable difference between the *National Code of Practice for Induction for Construction Work* (Australian Safety and Compensation Council 2007) and the *Construction Work Code of Practice* (Safe Work Australia 2012). The previous *National Code of Practice for Induction for Construction Work* (Australian Safety and Compensation Council 2007) included a section entitled "How are participants trained and assessed?", which stated in part:

General induction is a structured training course that has a nominal duration of 6 hours face-to-face delivery. This can be extended where necessary to accommodate learning preferences or special learning needs.

The previous *National Code of Practice for Induction for Construction Work* also made a reference to the *Delivery and Assessment Guide, WELL resource for CPCCOHS1001A Work safely in the construction industry* produced by the Construction and Property Services Industry Skills Council and indicated that the delivery and assessment guide "includes advice for RTOs on structuring the general induction course and an assessment instrument to ensure consistency in learning outcomes."

The *Construction Work Code of Practice* (Safe Work Australia 2012) is silent on duration of the training, method of delivery. The only specific national reference that remains to duration and method of delivery now resides in the Construction and Property Services Industry Skills Council's *Delivery and Assessment Guide*



where six hours delivery of the training is recommended. State and territory work health and safety regulators have different requirements in relation to duration. Two regulators require six hours on their web sites, two recommend six hours on their web sites and the remainder are silent about the duration of delivery.

The mandatory General Construction Induction training results in a statement of attainment (and the White Card) being issued to people who have successfully completed the unit of competency CHCCOHS1001A *Work safely in the construction industry* through an RTO registered to deliver and assess the unit. Completion of the unit is intended to provide new building and construction industry workers with the introductory knowledge and skills needed to commence work within the building and construction industry.

The unit of competency, which is included in the CPC08 *Construction, Plumbing and Services Training Package* was specified as meeting the requirements for general induction training in the *National Code of Practice for Induction for Construction Work*, developed and adopted by all jurisdictions in 2007. The White Card provides evidence of a person's completion of the induction training before they are permitted to commence work on a construction site.

Competency in the unit CPCCOHS1001A *Work safely in the construction industry* means that the trainee will have:

- *basic OHS knowledge required prior to undertaking designated work tasks within any of the sectors in the construction industry; and*
- *communication skills, including the ability to verbally report construction hazards and risks, to ask effective questions and to relay information to others.*

The unit is unusual in the VET system, in that it cannot be assessed on a construction worksite, as it is essential to have completed the unit before entering such a worksite. Nevertheless, the unit refers to 'practical' assessment. Students need to be able to demonstrate the *selection and use of relevant personal protective equipment*. For example, such equipment could include high-visibility vests, respiratory devices, safety footwear and hearing protection. Hence the unit clearly requires that students or trainees can demonstrate familiarity with and use of relevant safety equipment.

2.4 Current regulatory arrangements for the White Card

Work health and safety legislation and accompanying Codes of Practice are administered by state and territory work health and safety regulators and a review of arrangements for administration of the White Card indicates that requirements differ across jurisdictions. In some jurisdictions, for example Queensland and South Australia, the White Cards are issued by the RTO that delivers the training. In some other jurisdictions the White Card is issued by the regulator following completion of the training with an RTO.

There are also significant differences across jurisdictions in how the training is delivered. Several jurisdictions permit online delivery and assessment (for example Queensland and Western Australia) whereas RTOs registered in other jurisdictions (for example New South Wales, Australian Capital Territory and Northern Territory) are required to deliver face-to-face training only. Table 2 has been compiled from information extracted from work health and safety regulator web sites. Where a particular jurisdiction does not itself issue White Cards where delivery and assessment has been completed online, such White Cards are still recognised by the work health and safety regulators in each jurisdiction.

The issue of method of delivery and assessment is a key stakeholder concern and was, therefore, a focus of the review as outlined later in this report.

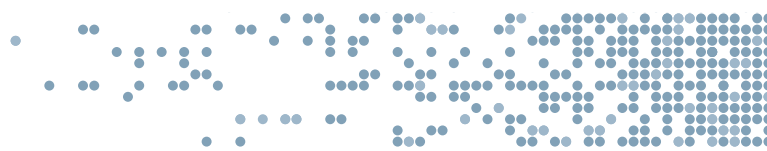


Table 2: White Card requirements of work health and safety regulators

Jurisdiction	Process for issuing	Mode of delivery	Duration of delivery	Other requirements or employer issues
NSW	100 points identity check* and successful completion of training, application to WorkCover.	<p>RTOs must ensure that training is face-to-face.</p> <p>WorkCover mandates the use of standardised assessment and recognition of prior learning (RPL) tools that have been developed by the Construction and Property Services Industry Skills Council.</p>	<p>RTOs must ensure that training is of six hours durations.</p> <p>Suggested time frames for each element of the unit are detailed within the Construction and Property Services Industry Skills Council (CPSISC) Trainer's and Assessor's Guide for the specified unit of competency.</p> <p>Time frames may be extended, where necessary, to accommodate learning preferences or special learning needs.</p>	<p>The Card ceases to be current if holder has not worked in construction for two years or more.</p> <p>Some employers refuse to accept White Cards achieved through online delivery.</p>
QLD	The RTO issues the cards.	Face-to-face and online methods acceptable.	No timeframes are specified on the regulator website.	No issues known
NT	Photo ID required. Cards printed centrally and sent to RTOs to issue.	Face-to-face and online methods acceptable.	Training should be at least six hours.	<p>WorkSafe issues a unique identifier to RTOs, with this number printed on White Cards.</p> <p>Currency requirement as for NSW.</p>
WA	RTO issues at completion of training.	Face-to-face and online methods acceptable.	No minimum training duration stated on the regulator website.	Employers may require training to be repeated if workers not in workforce for more than two years.

ACT	Office of Regulatory Services issue White Cards.	Training is described as a formal, face-to-face training program.	Suggested duration of six hours.	No issues known
TAS	Workplace Standards TAS issue White Cards.	General Induction training is described as classroom training, with online training only available under strict conditions.	No minimum duration is described on the regulator web site.	No issues known Currency requirement for NSW.
VIC	RTO requires photo ID. WorkSafe VIC issue White Cards.	Regulator website refers to the <i>National Code of Practice for Induction for Construction Work</i> which describes the training as a structured training course that has a nominal duration of six hours face-to-face delivery.	Website lacks detail but refers readers to the <i>National Code of Practice for Induction for Construction Work</i> which quotes a nominal duration of six hours.	No issues known
SA**	RTOs issue at completion of training.	Face-to-face training is encouraged.	No minimum training duration stated on the regulator website.	Employers may refuse to accept White Cards delivered through online training and assessment. Construction site managers in South Australia have the right to refuse entry to a person, and require a person to be re-trained if they decide that there is a need for re-training.

Source: the web sites of work health and safety regulators, 2013.

* Identity is established by providing a combination of primary documents, such as birth certificates, passports citizenship certificate and secondary documents, such as a driver licence issued by an Australian state or territory, identification cards issued by tertiary institutions or the public service.

** As at July 2013, the content of the SA regulator web site relating to construction induction training was being revised.



Chapter 3

Scale and nature of White Card training

3.1 The scale of White Card training

Safe Work Australia has advised that approximately 490,000 White Cards were issued in the past 12 months². This number is in excess of the predicted industry growth, as described in Chapter 2. The number of White Cards issued in some jurisdictions has dropped, however, and may relate to restrictions on online delivery in these jurisdictions. Some 70% of White Cards nationally are now issued in just two states, Queensland and Western Australia, where the work health and safety regulators permit online assessment of training leading to a White Card. Certain RTOs delivering through a face-to-face mode have informed ASQA that they cannot compete with online delivery; that they are considering leaving the market; and/or that they are planning to move to online delivery. White Card issuance numbers for the past five years are shown in Table 3.

Table 3: Construction induction cards issued

Jurisdiction	2008	2009	2010	2011	2012	Comments
NSW	96,748	87,891	95,419	77,267	66,427	Does not include replacement cards
QLD	Data not available	Data not available	Data not available	Data not available	182,400	
VIC	Data not available	Data not available	56,513	47,152	37,768	These figures may be financial year rather than calendar year
SA	31,728	34,888	26,148	Data not available	Data not available	Cards are no longer issued by SafeWork SA
WA	Data not available	162,500	162,500	162,500	162,500	These figures are an average, as the cards are issued to RTOs that then issue directly to competent trainees.
TAS	Data not available	Data not available	12,466	10,124	7,391	
ACT	Data not available	6,792	5,227	3,679	2,387	
NT	Data not available	Data not available	11,655	6,614	4,748	Data relates to financial years

Source: *The state and territory work health and safety regulators, 2013.*

² Some jurisdictions have calculated the number of Cards issued in a calendar year, others for the previous 12 months. One jurisdiction has not collected this data since 2010, so data from 2010 has been included in the total of 490,000.

3.2 White Card training delivery

At the commencement of the strategic review ASQA conducted a survey of RTOs that are registered with ASQA and registered to deliver the unit of competency CPCCOHS1001A *Work safely in the construction industry*. The survey was designed to inform the review about the scale and nature of delivery of the unit across the country. Because it generates a picture of the potential volume of delivery it provides the context for considering the seriousness and significance of stakeholder concerns about poor quality delivery and assessment. The survey also provided the opportunity to seek RTO perspectives and input to the review by inviting submissions from RTOs that were surveyed.

The survey findings are summarised in this chapter.

The survey asked RTOs to provide the following information:

- whether the RTO is currently delivering the unit;
- if not, when was it last delivered;
- will the RTO deliver it in the next six months;
- is it delivered primarily to students wanting a White Card;
- what is the delivery method;
- what is the assessment method; and
- how long does the training and assessment usually take.

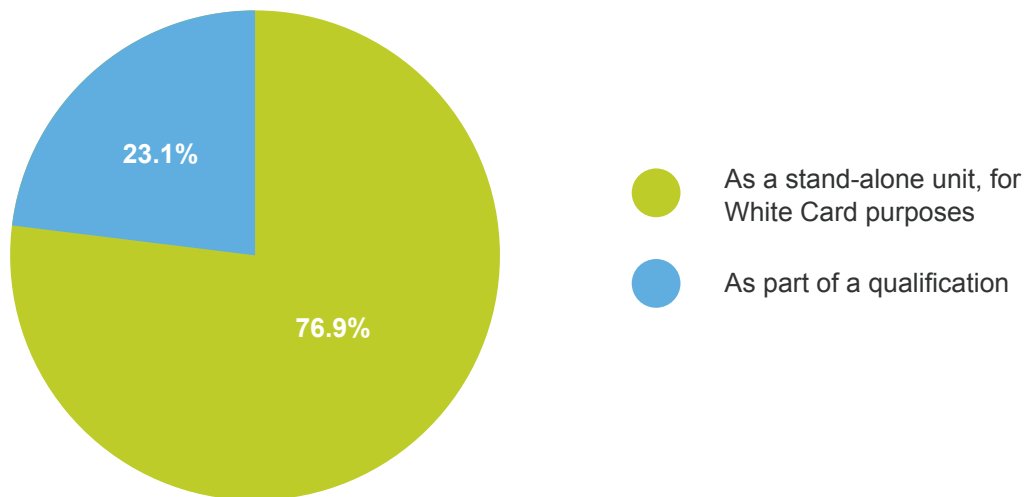
The survey was sent to 851 RTOs, with replies received from 768 (90.2%).

Many RTOs have applied to ASQA for approval to have the unit listed on their registration. Others have applied to have qualifications, which include the unit to be listed on their registration. Many of the latter group responded to the survey that they had no idea they were registered to deliver the unit and had never delivered it. Others had never delivered the unit and indicated they intended to withdraw it from their registration. In all 593 RTOs indicated that they actually deliver the unit.

Most RTOs (76.9%) that indicated that their primary reason for having the unit of competency on their registration is to deliver White Card training as shown in Figure 3. That is, they are not delivering it primarily as part of a qualification. Of the 593 respondents to the survey, 456 replied that their primary purpose in delivering the unit was to enable students to receive the White Card and 137 RTOs indicated they primarily delivered the unit as part of a certificate level qualification. The unit is included in 104 qualifications.



Figure 3: White Card delivery

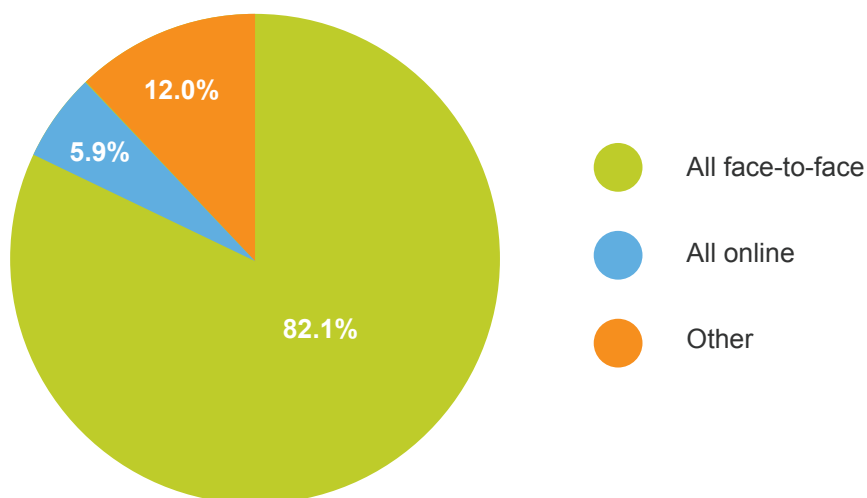


Source: ASQA survey, 2012.

3.3 Delivery method

Most RTOs, 487 (82.1%), that responded to the survey indicated their delivery method for the White Card was face-to-face as shown in Figure 4. Of the 593 respondents, 71 (12.0%) indicated their training delivery was through a combination of means, including distance, work-based and online. Another 35 (5.9%) identified that online delivery was their exclusive mode of delivery. The percentage of RTOs that responded to the survey and use online delivery could, therefore, be estimated to be 17.9%.

Figure 4: Training delivery method used by RTOs



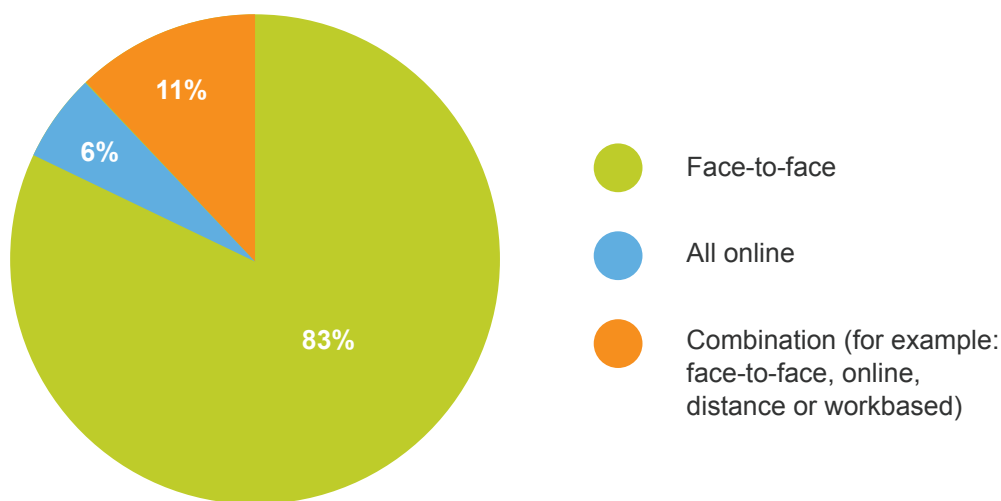
Source: ASQA survey, 2012.

The data for delivery method gathered through the sample of 47 RTOs audited for the third component of this review indicates that 95% of White Cards were delivered through online training and assessment by 25.5% of the sampled RTOs. For information on the other components of the review, see Chapter 5, page 24.

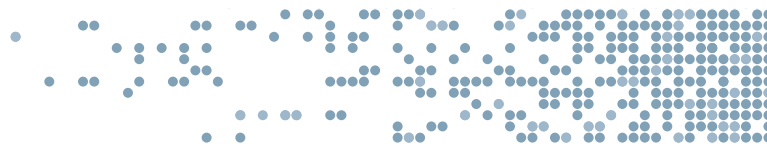
3.4 Assessment method

Most RTOs (83.0%) indicated their assessment method for the White Card was a face-to-face method as shown in Figure 5. Of the 593 respondents to the survey, 491 RTOs do all assessment through a face-to-face method, with 35 (6.0%) doing online assessment only. A further 67 (11.0%) indicated 'other' methods. No further details are available for this number, but it would be consistent with delivery method as shown in Figure 4, for the majority of this to include at least some online assessment.

Figure 5: Assessment method used by RTOs



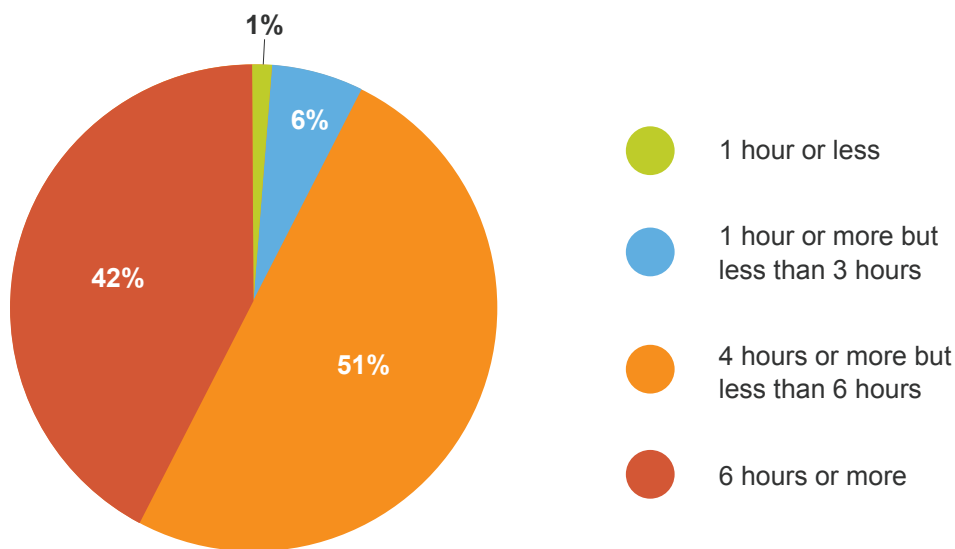
Source: ASQA survey, 2012.



3.5 Duration of training and assessment programs

The Construction and Property Services Industry Skills Council recommends a duration of six hours for White Card training in its *Delivery and Assessment Guide 2012*. However, 58% of respondent RTOs to the ASQA White Card training survey indicate that they deliver training and assessment in fewer than six hours. This finding was replicated in the RTO audits as outlined in Chapter 5. Given the concerns expressed by industry about short duration of training and its impact on the students' competency and potentially safety on construction sites, as outlined in Chapter 4, it confirms there is a significant issue.

Figure 6: Duration of RTO training and assessment programs



Source: ASQA survey, 2012.



Chapter 4

Stakeholder perspectives

Stakeholder perspectives on the White Card were sought from five sources:

- industry consultation meetings with employers and unions;
- management committee input;
- RTO submissions gathered during the RTO survey;
- comments invited from RTOs during the audit process; and
- feedback from work health and safety regulators in the commonwealth and each state and territory.

The key themes identified from each group of stakeholders are summarised below. There is significant commonality of views across industry and RTO groups. Work health and safety regulators were more diverse in their views, particularly in relation to views about online training.

4.1 The industry consultations

Two focus group meetings were held with employers in Melbourne and Sydney and one with unions in Canberra.

The purpose of the consultations, which were conducted at the outset of the review, was to:

- test the range of concerns that had been raised with ASQA in the lead up to the strategic review;
- test the breadth and depth of concerns; and
- identify any examples of good practice that generate confidence in the impact on safety of the White Card training.

Some employers also drew upon advice provided by their employees about their experience with the training.

Several employers observed that while the White Card provides an appreciation of what a new employee on a construction site needs to know, it is the employer's responsibility to build on the White Card training and provide the new employee with appropriate knowledge and skills for safety.

In a similar vein it was noted that a good employer will ensure there is a strong relationship between the basic training provided by the White Card and the induction provided on site by the employer.

The strongest and most consistent concerns were expressed about the risks of online delivery to achieving quality outcomes. However, several employers also noted that face-to-face delivery is no guarantee of quality.

Online delivery

Online training and assessment raises two concerns for industry:

- how are RTOs able to confirm that the identity of the student who undertakes the training is the same as the employee who is issued the White Card; and
- how well can RTOs delivering and assessing students online determine whether the student has acquired the appropriate communication competencies and more generally has been familiarised with a work place.



In its *Environmental Scan 2013-14*, the Construction and Property Services Industry Skills Council noted that its RTO Network Members:

“Raised the increasing use of technology and an interest in capturing the quantum growth in tablet and smart technology to provide training to potential students. This enthusiasm to embark into new technology frontiers is also tempered with quality concerns about student ID verification and other factors that lead to authentic and reliable assessments. For example, stakeholders raised concerns about the value and reliability of the online ‘White Card’ course which is a key tool to maintain workplace safety in the construction industry”. (CPSISC 2013, p16.)

Some in the industry suggested that while online delivery may be suitable, online assessment is not, for the reasons outlined above.

Further elaboration of the issues with respect to verifying the identity of students in an online environment is included Chapter 5.

It is easy to identify those new employees who have received the White Card training online. Their work health and safety ‘readiness’ is not as solid as that of new employees who gained their White Card through face-to-face training. (Employer)

People attending the industry focus groups identified the following issues:

- many students receive their White Card even though they have not participated effectively when the training is delivered face-to-face;
- in some instances, students are provided with the answers during the assessment;
- merely providing the course in a ‘face-to-face’ delivery mode is no guarantee of quality training;
- RTOs that invest in resources and appropriate training and assessment are being undercut by other RTOs. Some RTOs, particularly those delivering and assessing online may be focusing on how best to reduce the cost to the student rather than ensuring the student becomes competent. This leads to some new workers on construction sites not having the appropriate level of work health and safety awareness. It also puts pressure on those RTOs currently delivering quality training to focus on costs rather than providing appropriate training and assessment;
- delivery of the White Card through VET in School programs was raised as a concern because schools can have relatively poor links with industry and teachers can lack recent relevant industry experience; and
- at one focus group, all employers indicated they undertake their own on-site induction for new employees and most considered the White Card training to be largely superfluous.

Further industry input was also provided by members of the management committee for the review. The members of the management committee came from a variety of organisations, with details provided in Appendix B. All members of the committee shared a commitment to assisting with improving the training and assessment of the unit, to achieve better safety in the construction industry. The issues identified below are not attributed to any particular committee member.

The committee raised the following specific issues:

- trainers and assessors should hold an Australian Qualification Framework Certificate IV qualification in occupational (or work) health and safety;
- the standard for identity verification should be the same as for other high risk-work units, that is a minimum of a photograph and signature;

- communication skills as required in the unit are very difficult to assess in an online environment;
- the Evidence Guide within the unit CPCCOHS1001A *Work safely in the construction industry* requires that *physical resources should include equipment modified for people with disabilities*. Providing such resources, modified or not, in an online environment would be extremely difficult;
- other requirements of the Evidence Guide within the unit of competency CPCCOHS1001A *Work safely in the construction industry* involve RTO provision of resources adapted to meet the needs of students - *assessment processes and techniques ...appropriate to the oracy, language and literacy capacity of the assessee*; and
- where students have poor oracy or literacy in English, a face-to-face training and assessment environment is essential.

4.2 Submissions from registered training organisations

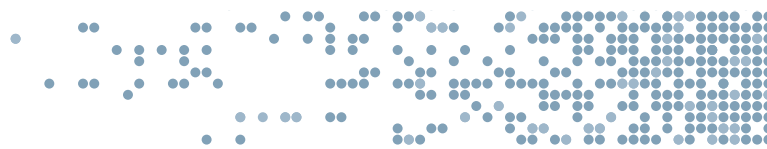
The 851 RTOs that were surveyed for the review were also invited to “*make a submission to ASQA on any issues you perceive concerning the delivery and assessment of the White Card unit*”. Two hundred and sixty RTOs (30.5%) responded to the invitation and made submissions in addition to participating in the survey. This has provided important qualitative information to inform the review and supplements the industry perspective gained from the consultations.

The key themes that emerged from the submissions are summarised in Table 4, followed by some illustrative quotes drawn from the submissions.

Table 4: Summary of RTO concerns

Concern	Description of concerns	Number of respondents	Proportion (%)
Online delivery compromising safety	Training online does not assure safety	65	25
Identity and online delivery	No way of absolutely verifying identity	42	16
Unfair competition	RTOs using face-to-face delivery cannot compete with online	37	14
Jurisdictional differences	Differences between work health and safety regulators are creating administrative burdens for RTOs	25	10
Duration	Short-duration programs do not meet assessment requirements of unit and undermine safety	23	9
English skills	People with poor English skills are being issued the White Card suggesting assessment requirements of unit not met	17	7
Retain online	Online is efficient, cost effective	7	3

Source: ASQA survey, 2012.



The above comments can be broadly grouped into those against online programs for a variety of reasons and those supportive of online programs, with the majority expressing concern about online delivery.

Those against online delivery – identity issues, workplace context and literacy/English language

- *The online course is ridiculous as I have met people who hold these Cards who admitted they didn't personally do the course – someone else did it for them.*
- *A number of prospective apprentices confirmed that a parent completed this unit of competency for them.*
- *The widespread practice is to have office staff complete the online course on behalf of others.*
- *Integrity of the assessments is totally corrupted. The employers call an external person and give them personnel details and he/she does the course for them.*
- *We have had cancellations by people from a non English speaking background because the boss will do it for them online.*
- *I completed an online course using the details of my dog.*
- *We include a mock construction site and students practise use and maintenance of Personal Protective Equipment... essential especially for school leavers.*
- *Due to the need to ensure assessment authenticity, validity and reliability, we have made the decision to only ever offer the course face-to-face.*
- *A large number of students have poor literacy and face-to-face means they can receive help.*
- *The course needs to be adjusted where students have poor English – not possible with online delivery.*

On the other hand, those supportive of online delivery

- *Online training under the supervision of an employer is cost effective for new arrivals to Australia.*
- *We are developing software to meet identity requirements.*
- *Webcam video and screen [recording] can be effective.*

Another key theme was the impact on quality of short-duration programs, a theme seen as applicable to both face-to-face and online delivery.

- *In some cases online delivery takes less than an hour.*
- *Short-duration training undermines quality and exposure of applicants to a range of scenarios.*
- *No opportunity to discuss the concepts in risk identification.*
- *The course can be completed in 15 minutes.*
- *You can get a Queensland or Western Australian White Card in as little as an hour.*
- *Students need to practice the skills over a period of time in an industry setting.*



Separate to the many suggestions to prohibit online delivery and assessment, there were a number of other suggestions to address the concerns including:

- shelving the unit and replacing it with a mandatory presentation within any worksite induction;
- issuing the White Card from one body nationally;
- having a standard assessment process across the country; and
- restricting delivery to RTOs with specialist skills.

4.3 Comments provided by RTOs during audits

ASQA conducted an audit of 47 randomly sampled RTOs registered to deliver the unit. RTOs were selected for a site audit across all jurisdictions and their delivery encompassed both face-to-face and online delivery methods. A full description of the audit methodology is included in Chapter 5.

In addition to ASQA's usual evidence-based audit process, the RTOs audited were asked to provide input to the review on what they liked, did not like, or would change about any aspect of training and assessment. This has provided additional stakeholder views to inform the review and supplements the RTO perspective gained from the submissions gathered as part of the survey.

Comments were also provided by 26 RTOs audited specifically for the review. The common themes were consistent with those provided by industry and the RTOs that were surveyed. The most consistent theme, expressed by nine of the 26 RTOs focused on concerns about online training and delivery including:

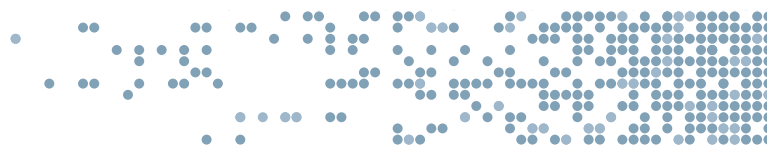
- difficulties with identity verification and potential for fraud;
- less support can be provided to students;
- poor reliability of assessment including in particular, assessment of the required level of competence in communication skills;
- short duration bringing into question whether the outcomes of the unit can be achieved;
- the conceptual nature of online, which does not provide real or simulated workplace experience; and
- compromising of safety for individuals and their colleagues.

Several others raised quality issues that related to face-to-face as well as online training.

Answers were given in the face-to-face assessment and it was a “tick the box” focused on being compliant for the White Card rather than competent.

Finally, a number of RTOs made suggestions about improvements to the current system:

- reduce the administrative burden for RTOs that work across jurisdictions by making requirements of the jurisdictional work health and safety regulators consistent;
- make the processes consistent across jurisdictions, including assessment;
- make the rules the same for all providers and create a level playing field; and
- make the initial White Card training quite intense and implement refresher training every two years, which could be an online process.



4.4 Comments provided by work health and safety regulators

Work health and safety regulators were contacted for their views on the current White Card arrangements. Some regulators contacted field staff who provided comments from trainers. Regulators were divided in their views about online training with some being supportive.

Those who were supportive commented:

- we accept online delivery. There has never been any evidence of fraud (with student identity);
- the online industry is too big for us to go back to only allowing face-to-face delivery; and
- we would be concerned about moves to unnecessarily restrict access to online White Card courses. To require face-to-face delivery will be difficult for employers particularly where students are in rural and remote locations. It would be likely to add significant cost to what is an induction course. There may be a shortage of trainers.

Others were strongly against online training and assessment:

- the web site of one work health and safety regulator comments that industry in its state has expressed a strong view that online training for this course is not acceptable; and
- regulator comments included:
 - the legitimacy of online training is questionable;
 - with online courses we have always had concerns that the person actually completing the answers and responses is that actual person;
 - multiple choice scenarios can allow people to guess the answers by a process of elimination;
 - the requirement to mutually recognise White Cards issued following training by an online provider in another state means that there are significant concerns about safety until concerns about online training are addressed; and
 - the reform of online General Construction Induction training will not address concerns that there may be thousands of workers who have already obtained a White Card online and are potentially at risk because of the inadequacy of this training. The inadequacy of this training is attested by the fact that some construction firms have required workers with online White Cards to undertake face-to-face training because of their concerns about the basic safety understanding of these workers.

Others raised the issue of quality in general:

- some trainers are ignoring poor English skills of students and handing out White Cards;
- some people say that the training is a waste of time and induction should be done on work sites; and
- some RTOs allow clients to be assessed before completing the full training.

There were also concerns about the new *Model Code of Practice: Construction Work* which does not include the provisions of the now superseded *National Code of Practice for Induction for Construction Work* in relation to duration of training (six hours) and method of training (face-to-face).

If this situation stands, there will be a severe diminution of the original Code for induction training and its intent, leading to a reduction in the quality and standing of general induction training.
(Comment from a state regulator)



Chapter 5

Analysis of the quality of White Card training and assessment

The review included three key components to provide a picture of the quality of training and assessment of the unit CPCCOHS1001A *Work safely in the construction industry*. These were: surveying all RTOs registered to deliver the unit; stakeholder consultation; and auditing RTOs. Competency in the unit allows the issuance of a White Card.

The audit component consisted of a random sample of RTOs that are registered with ASQA and are delivering the unit of competency CHCCOHS1001A *Work safely in the construction industry*. An additional number of RTOs specifically identified as delivering the unit in the online environment was added to the sample as a result of the serious concerns expressed by stakeholders about this method of delivery and assessment.

The data gathered through the audit of randomly sampled RTOs was supplemented by data gathered through audits conducted through ASQA's usual compliance functions.³ This included an additional 16 RTOs audited between October 2012 and March 2013.

As outlined in Chapter 4 the audits also provided the opportunity to invite RTOs that were audited to provide input to the review.

The focus and purpose of the audits; the sample used; the methodology adopted; and the key findings are outlined in this chapter.

5.1 Focus and purpose of the audits

The focus of the audits conducted for the strategic review was informed by the stakeholder concerns that initiated the review. These included concerns about the duration of delivery being too short to gain the required knowledge and competency. It was felt that short duration impacted on the quality of training and assessment, particularly in relation to communication and comprehension skills and understanding of workplace context and inadequate verification of identity in the case of online delivery and assessment. Therefore, the audits focused attention on selected standards in the *Standards for NVR Registered Training Organisations 2012* relevant to quality training and assessment. The purposes of the audits conducted were to establish:

- whether RTOs' strategies for training and assessment and resources meet the requirements of the training package;
- whether RTOs' trainers and assessors have all the competencies required;
- whether RTOs are assessing all required skills from the unit of competency CHCCOHS1001A *Work safely in the construction industry*; and
- RTO practice in verifying the identity of students, particularly but not only in the online delivery and assessment environment.

³ RTOs must be compliant at all times with the VET Quality Framework, which includes the *Standards for NVR Registered Training Organisations 2012*. All training organisations applying for initial registration, to renew registration or to be registered to deliver additional qualifications, have their applications assessed against the standards through an audit or risk-assessment process.



5.2 Audit sample

As mentioned previously the audit sample included 63 RTOs in total, consisting of 40 RTOs that were randomly selected, an additional seven selected from those identifying as delivering the unit in an online environment and 16 RTOs that were audited by ASQA for re-registration purposes from October 2012 to March 2013. Details of the numbers and spread of the 63 RTOs across the states and territories are shown in Table 5.

Table 5: RTOs audited for the White Card review.

Jurisdiction	Compliance – RTOs sampled through usual regulatory process	RTOs randomly sampled for review	Total number audited
ACT	-	1	1
NSW	2	13	15
NT	-	1	1
QLD	5	17	22
SA	4	2	6
TAS	-	1	1
VIC	-	7	7
WA	5	5	10
Total	16	47	63

Source: ASQA, 2012.

5.3 Audit methodology

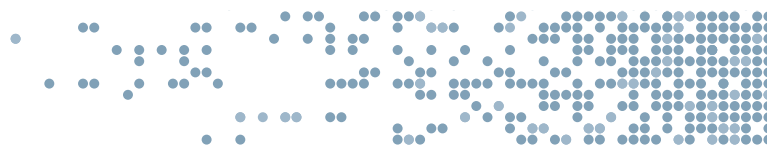
Audits are undertaken by ASQA to determine if RTOs are compliant with the VET Quality Framework. In particular, audits focus on compliance against the selected standards reviewed. When ASQA finds practices that are not compliant at audit, RTOs are given time to provide evidence about how they have rectified any non-compliance.

Evidence from all audits conducted for the review was collated to provide a picture of the level of compliance and areas that were not compliant with the standards at the time of audit. It provides a “point-in-time” picture. Each RTO found not compliant during the review has been given the opportunity to rectify its non-compliance. Many of the RTOs are still in the process of providing evidence to demonstrate their compliance and ASQA will continue to follow this up.

In relation to the sample of 47 randomly selected RTOs, additional information was collected for the purposes of the review. This included factors such as the number of enrolled students, the type of funding, RTO location and program duration. This information has informed the overall picture of training for the White Card, particularly in relation to program duration.

The audits focused on identifying evidence of compliance with the following standards relevant to stakeholder concerns about White Card training:

- strategies for training and assessment meet the requirements of the relevant training package or VET accredited course and have been developed through effective consultation with industry (Standard 15.2).
- resources – staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the training package or VET accredited course and the NVR registered training organisation’s own training and assessment strategies and are developed through effective consultation with industry (Standard 15.3).
- training and assessment is delivered by trainers and assessors who:
 - a. have the necessary training and assessment competencies as determined by the National Skills Standards Council;
 - b. have the relevant vocational competencies at least to the level being delivered and assessed;
 - c. can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and
 - d. continue to develop their vocational education and training knowledge and skills as well as their industry currency and training/assessor competence (Standard 15.4).
- assessment including Recognition of Prior Learning (RPL):
 - a. meets the requirements of the relevant training package or VET accredited course; is conducted in accordance with the principles of assessment and the rules of evidence;
 - b. meets workplace, and where relevant, regulatory requirements; and
 - c. is systematically validated (Standard 15.5).
- the NVR registered training organisation has informed clients before they enrol or enter into an agreement about the training, assessment and support services to be provided and about their rights and obligations (Standard 16.3).



5.4 Audit outcomes - compliance with the standards

An overview of the audit outcomes in relation to compliance against each of the standards audited is provided in this section followed by a detailed analysis in relation to each standard which outlines:

- the key findings against each standard;
- the requirements of each standard;
- the requirements of the CPC08 *Construction, Plumbing and Services Training Package* to which the unit of competency CPCCOHS1001A *Work safely in the construction industry* belongs. The training package contains information on what must be included in the training and assessment program; and
- areas of non-compliance.

Where appropriate the audit outcomes are also illustrated by industry and stakeholder comments and examples of good practice, which can be used to inform improvements in the future.

The issue of verification of student identity in online delivery and assessment is explored in detail as it emerged as a key issue of concern through stakeholder consultations and the audit outcomes.

The key findings arising from the audit outcomes form the basis for the recommendations in Chapter 6.

5.5 Overview of audit outcomes

The outcomes of the initial site audits of the sample of 63 RTOs show that although 49 (77.7%) were found compliant in their training and assessment strategies, 20 (31.7%) were not compliant with assessment materials and practices at the initial site audit. This indicates that a large number of RTOs are not following their specified strategy. Twelve of the RTOs (19.1%) in the sample delivered using an online training and assessment system, the other 51 RTOs (80.9%) used a face-to-face delivery and assessment method. However, 100% of the online group were not compliant at the initial audit with the assessment standard (Standard 15.5), compared to 66.7% of the face-to-face group.

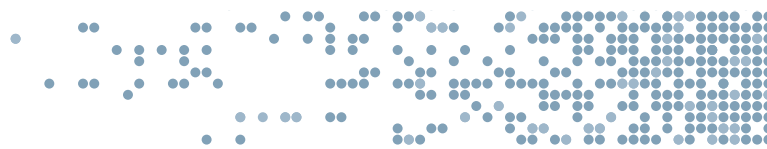
It needs to be stressed, however, that the non-compliance identified at the initial audit ranges from minor issues that can be and actually are able to be addressed by RTOs once they are given the audit report by ASQA, which identified those areas where they were not fully compliant, right through to very serious levels of non-compliance that involve a regulatory sanction of the RTO (including possible loss of registration as an RTO or the suspension or cancellation of a particular training program from their registration).

Nevertheless, the fact that the majority of RTOs were compliant with most standards but in contrast the majority were not compliant with the assessment standard (Standard 15.5) could point to a systemic problem with the assessment standard itself, with the clarity of requirements of the training package, or with the benchmark set for the competencies of trainers and assessors. These issues are explored in the analysis of the audit outcomes against each standard. The number and percentage of RTOs that were compliant or not compliant against each of the standards audited is shown in Table 6.

Table 6: The levels of compliance and non-compliance at the initial audit

Standard	Compliant RTOs		Non-compliant RTOs	
	Number	Proportion (%)	Number	Proportion (%)
Strategies for training and assessment <ul style="list-style-type: none"> meet the requirements of the training package developed through effective consultation with industry (Standard 15.2) 	49	77.7	14	22.3
Staff, facilities, equipment and training and assessment materials consistent with the requirements of the training package and RTO's training and assessment strategies developed through effective consultation with industry (Standard 15.3)	43	68.3	20	31.7
Trainers and assessors have required training and assessment competencies, relevant vocational competencies, demonstrate current industry skills, continue to develop knowledge, skills and competence (Standard 15.4)	53	84.1	10	15.9
Assessment meets requirements of the training package, principles of assessment and rules of evidence and workplace and regulatory requirements and is systematically validated (Standard 15.5)	16	25.4	47	74.6
Before enrolment students informed about the training, assessment and support services and rights and obligations (Standard 16.3)	50	79.4	13	20.6

Source: ASQA, 2012.



5.6 Detailed analysis against each standard

5.6.1 Training and assessment strategies – Standard 15.2

The majority of RTOs (77.7%) were compliant with this standard at the initial audit. Of the 22.3% that were not compliant, it was found:

- there is little evidence of effective industry consultation in the design, implementation and ongoing review of the training and assessment strategies.

Following the opportunity to rectify the non-compliances identified at the initial audit, the number of RTOs that remain not compliant are expected to fall from the 22.3% identified as not compliant at the initial site audit.

Requirements of the standard

RTOs must have strategies for training and assessment which meet the requirements of the training package. These strategies are to guide trainers and assessors who are delivering a unit of competency, skill set⁴, qualification, or accredited course to students. They must be developed through effective consultation with industry. There is no specific format for describing a strategy. However, it should include key parameters such as whether it is delivered in a classroom or work-based setting (or both); how much time will be involved; what if any pre-requisite learning is required; who the targeted learners are (school leavers, existing workers, et cetera); as well as an outline of the content.

An RTO can change its training and assessment strategy at any time and there is no requirement that the changes be reviewed by a regulator. Such changes might be made to reflect the needs of a new client group or the availability of different resources. Such flexibility is necessary and desirable. However, the requirement that the strategies are developed with effective consultation with industry should mean that the strategies (both as developed initially and as amended) would meet the needs of learners (and others impacted such as employers and work colleagues) and will continue at all times to meet the requirements of the training package.

Requirements of the training package

The Construction and Property Services Industry Skills Council's 2012 *Delivery and Assessment Guide*, *WELL Resource* for CPCCOHS1001A *Work safely in the construction industry*, contains a detailed training and assessment strategy, assessment plan and assessment requirements. While this is a guide, it is a statement from industry of its expectations. Where an RTO wishes to use a training and assessment strategy that varies from this guide, there should be effective consultation with industry.

Areas of non-compliance with training and assessment strategies Standard 15.2

Of the RTOs audited, 49 (77.7%) were compliant with this standard at the initial audit, and 14 (22.3 %) were not compliant with Standard 15.2. Key areas of non-compliance included:

- training and assessment strategy not consistent with practice;
- no assessment strategy for assessing communication skills;
- target group for the strategy not identified; for example, existing worker or school leaver, English speaker or person with English as a second language;

⁴ A 'skill set' is a cluster of units of competency which leads to an occupational skill

- no provision for literacy assistance or identification of needs;
- online strategy not covering the range of work environments as detailed in the unit of competency;
- no method to assess verbal reporting of hazards and risks;
- the strategy did not provide information to trainers on how to deliver the unit of competency;
- no evidence of effective industry consultation;
- no process for reviewing strategy; and
- no training and assessment strategy.

All RTOs where non-compliance was identified at the initial audit were given 20 working days by ASQA to respond to the concerns raised. At the time of writing this report this process is not yet complete. Following the provision of rectification evidence by RTOs and the completion of the rectification process, the numbers remaining not compliant with this standard are expected to fall from the 22.3% of RTOs identified as not compliant at the initial audit.

Industry and RTO comments

Most stakeholders expressed concern about online learning particularly with respect to short duration and inadequate assessment of skills. It was, however, noted in one focus group that merely providing the training face-to-face is no guarantee of quality. Most employers consulted had concerns about employees who had achieved the White Card through online learning. One said that applicants for work were 'chalk and cheese' in the differences between students from face-to-face and online learning delivery. However, one employer said that the online environment could use multi-media, be interactive and has a place.

From the responses to the survey, RTOs were generally critical of programs of short durations, including the online ones.

Online trained people have very little knowledge. (Employer)

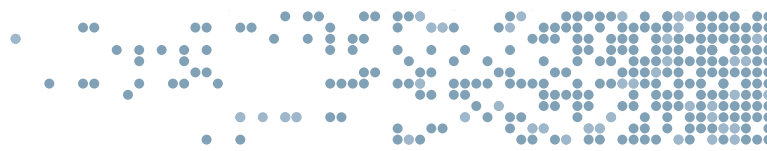
Short-duration training undermines quality and exposure of applicants to a range of scenarios. (RTO)

It cannot be effectively delivered in under six hours unless the content and practical assessment components are reviewed by the Skills Council. (RTO)

Examples of good practice

A number of examples of good practice by RTOs were identified during the audits including:

- extensive consultation with work health and safety regulators;
- RTO liaison with employers;
- internal reviews of the training and assessment strategy; and
- small class groups of, for example, 10 to 12 students.



5.6.2 Resources – Standard 15.3

The majority of RTOs (68.3%) were compliant with this standard at the initial audit. However, of the 31.7% that were not compliant at the initial audit many are not providing sufficient resources to meet the requirements of the unit of competency, particularly in relation to a simulated construction environment.

Following the opportunity to rectify non-compliance, the number of RTOs remaining not compliant with the standard can be expected to fall from the 31.7% identified at the initial audit.

Requirements of the standard

This standard requires RTOs to have the resources (staff, facilities, equipment, materials) as required by the training package and the training and assessment strategies, to deliver the programs. It intersects with some other standards. For example, if the trainers do not have appropriate qualifications (Standard 15.4), or assessment is not compliant with requirements (Standard 15.5), then the RTO is also not compliant with Standard 15.3.

Requirements of the training package

The Range Statement in the unit of competency specifies resources that are required for its delivery and assessment; for example, '*personal protective equipment, safety signs and symbols, common construction hazards*'.

The critical aspects for assessment and evidence required to demonstrate competency in the unit, state that the assessment of the unit requires 'personal awareness' of the following:

- *applicable OHS legislative and safety requirements for construction work including duty of care;*
- *the range of common construction hazards and procedures for the assessment of risk and application of the hierarchy of control;*
- *OHS communication processes, information and documentation including the role of OHS committees and representatives, the meaning of common safety signs and symbols and procedures for reporting hazards, incidents and injuries; and*
- *general procedures for responding to incidents and emergencies including evacuation, first aid, fire safety equipment and PPE'.*

RTOs, therefore, need to ensure resources are available, including training and assessment resources that allow the student to demonstrate 'personal awareness'.

Areas of non-compliance

Of the RTOs audited, 43 (68.3%) were compliant with Standard 15.3 at the initial audit, with 20 (31.7%) not compliant with this standard. Key areas of non-compliance included:

- the language used in the online course was too complex;
- the photos used in the online material did not clearly illustrate risks and hazards in the workplace;
- learning materials did not address communication skills;

- learning materials were out of date;
- inaccurate information concerning state regulations was provided; and
- online visuals of personal protective equipment (PPE) and workplace hazards did not provide adequate workplace context for students.

All RTOs where non-compliance was identified at the initial audit were given 20 working days by ASQA to respond to the concerns raised. At the time of writing this report this process is not yet complete. Following the provision of rectification evidence by RTOs and the completion of the rectification process, the numbers remaining non-compliant with this standard are expected to fall from the 31.7% of RTOs identified as not compliant at the initial audit.

Industry and stakeholder comments

Key stakeholder comments relevant to this standard included:

- 'White Card training is seen to be very theoretical and provides little appreciation of the hazards a new employee can expect on a construction site.' (Employer)
- 'Students need to practice the skills over a period of time in an industry setting.' (RTO)
- 'The course must include practical application of hazard identification and interaction and critical discussion.' (RTO)
- 'Cut back on time in classroom and increase the time in a simulated workplace.' (RTO)

Examples of good practice

A number of examples of good practice by RTOs were identified during the audits including:

- use of a large simulated workplace environment resembling a real offshore working facility;
- use of a warehouse space set up as a construction site, with a range of hazards including a crane, scaffolding, drums and a range of personal protective equipment as listed in the unit;
- some online training materials using different media to provide a range of workplace contexts; and
- students practising using personal protective equipment.

The examples of good practice are in line with the Construction and Property Services Industry Skills Council suggested *Delivery and Assessment Guide* CPCCOHS1001A *Work safely in the construction industry*:

The program allows for some flexibility and includes suggested work activities which can be conducted on-site, or in a simulated work situation if needed. Face-to-face delivery methods should vary to cater for a range of learning styles, e.g. incorporating use of visual aids, practical demonstration, case studies, role play and simulation. (CPSISC 2012, p13.)



5.6.3 Trainers and assessors – Standard 15.4

The majority of RTOs (84.1%) were compliant against this standard at the initial audit.

Following the opportunity to rectify non-compliance, the number of RTOs remaining not compliant with the standard can be expected to fall from the 15.9% identified at the initial audit.

Requirements of the standard

The standard requires that trainers and assessors:

- have training and assessment competencies – currently defined as holding TAE40110 Certificate IV in Training and Assessment (or the earlier qualification, TAA40104 Certificate IV in Training and Assessment) from the *Training and Education* training package;
- have relevant vocational competencies;
- have current industry skills; and
- continue to develop their knowledge and skills related to VET knowledge, training and assessing competence and their industry currency.

It should be noted that on 17 June 2013 the National Skills Standards Council issued the *Determination for trainer and assessor competencies* to reflect changes made to the TAE10 *Training and Education Training Package's* Enterprise Trainer Skill Sets in relation to the minimum qualifications or competencies that must be held by trainers and people delivering nationally recognised training under supervision and assessors in the VET sector (NSSC 2013).

Given the high level of non-compliance (74.6%) with the assessment standard, (Standard 15.5), it is worth noting that the qualification TAE40110 does not include the unit of competency TAEASS502B *Design and develop assessment tools* as a core unit. There is in fact no requirement that an RTO employ anyone holding this unit. A correlation could be drawn between poor assessment practice and staff not trained to design assessment tools. While the standard may not require trainers and assessors to have the *Design and develop assessment tools* unit of competency, RTOs are required to have assessment materials and practices that meet the requirements of the unit.

Requirements of the training package

In addition to holding training and assessment competencies, trainers must hold industry competencies and have current experience. The CPC08 *Construction, Plumbing and Services Training Package* has the following requirements for Assessors (CPSISC 2013, p361):

- *formal recognition of competency, at least to level being assessed;*
- *relevant industry experience...workplace experience within the last two years in the competency area being delivered; and*
- *relevant occupational registration or licensing in areas where this is a regulatory requirement...*

Areas of non-compliance

Of the RTO's audited, 53 (84.1%) were compliant with this standard (Standard 15.4), with 10 (15.9%) not compliant with this standard. Key areas of non-compliance included:

- trainers not undertaking professional development;
- no evidence of industry currency; and
- qualifications of trainers not verified.

All RTOs where non-compliance was identified at the initial audit were given 20 working days by ASQA to respond to the concerns raised. At the time of writing this report this process is not yet complete. Following the provision of rectification evidence by RTOs and the completion of the rectification process, the numbers remaining not compliant with this standard are expected to fall from the 15.9% of RTOs identified as not compliant at the initial audit.

Industry and stakeholder comments

It's the trainer/assessor with years of experience that makes the course real because they have stories/ anecdotes about hazards et cetera. (RTO)

Examples of good practice

A number of examples of good practice by RTOs were identified during the audits including:

- trainer currency maintained through ongoing work on construction sites; and
- trainers completing an industry placement each year.

5.6.4 Assessment – Standard 15.5

At the initial audit the majority of RTOs audited (74.6%) were not compliant against Standard 15.5, which focuses on assessment practice. There is significant evidence of assessments not meeting the requirements of the unit of competency, the principles of assessment and the rules of evidence.

This is in contrast to:

- the majority of RTOs (77.7%) being found compliant in their training and assessment strategies, indicating that a large number of RTOs are not applying their specified strategies effectively; and
- the majority (84.1%) employ trainers and assessors whose qualifications and experience meet the standards, suggesting that the benchmark for trainer and assessor competencies is inadequate to meet the requirements of assessment practice.

Of the 63 RTOs audited, 15 RTOs assess online. Of these RTOs, 100% were found to be not compliant at the initial audit.

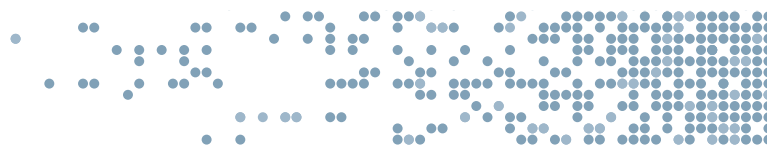
Of the 48 RTOs assessing, in a face-to-face mode, 66.7% were found to be not compliant at the initial audit.

Following the opportunity to rectify the non-compliance(s) identified at the initial audit, the proportion of RTOs found to be not compliant with the Assessment Standard can be expected to fall from 74.6% after the rectification period of 20 days.

Requirements of the standard

Assessment must:

- meet the requirements of the training package;
- be in accord with the principles of assessment, that is, be valid, reliable, flexible and fair; (see Appendix E)
- be conducted according to the rules of evidence, that is, for sufficient, valid, authentic and current evidence to be collected;
- meet workplace requirements; and
- be validated.



Requirements of the training package

The unit, in its *Application of the Unit* section states that it:

Supports the attainment of basic OHS knowledge required prior to undertaking designated work tasks within any of the sectors within the construction industry.

This statement appears to have been relied on by RTOs as an indicator that the unit is a 'knowledge unit'. This view appears to be reinforced for many RTOs from their reading of the "*Critical aspects for assessment*" section of the unit. The headnote states '*Evidence must confirm personal awareness of the following*', with a list including legislative requirements, range of hazards, procedures and communication processes.

It appears that the section '*Required skills*' in the unit are sometimes overlooked by RTOs when designing assessment tools. The required skills include:

- *verbally report construction hazards and risks;*
- *ask effective questions;*
- *relay information to others;*
- *discuss OHS issues and information; and*
- *comprehension skills to:*
 - *explain the basic OHS legislative requirements which will be applicable to own work;*
 - *explain the meaning of safety signs and symbols;*
 - *identify common construction hazards;*
 - *discuss the basic principles of risk management.*

The Performance Criteria for the unit include requirements for discussion and actual skills demonstration:

- 2.2 *Common construction hazards are identified and discussed.*
- 3.1 *OHS communication processes, information and documentation are identified and discussed.*
- 4.3 *Requirements for the selection and use of relevant personal protective equipment are identified and demonstrated.*
- 4.4 *Fire safety equipment is identified and discussed.*

This focus in the unit on 'discussion' and 'demonstration' means that any online assessment would need to include some interaction with an assessor.⁵ It is doubtful that entering a response to an online question or scenario qualifies as 'discussion'. A few RTOs providing online assessment have or are planning to incorporate a telephone conversation with students, to assist the assessment of elements of the unit requiring 'discussion'. This is not a common practice and appears at best to be random. It also appears to be primarily to verify identity.

⁵ The use of Skype technology enabling real time interaction with an assessor has been mentioned during the review as a potentially valuable tool, but no RTOs audited were found to be using this.

The requirements of the unit are reinforced in the Construction and Property Services Industry Skills Council's *Delivery and Assessment Guide 2012*, which states:

The work activities allow for some on-the-job training and assessment of skill and knowledge requirements as part of the participant's normal work (or in a simulated environment). Evidence can be gathered through a range of methods using the work activities, eg through observation, questioning and documentation such as notes taken.

Areas of non-compliance

Only 16 (25.4%) RTOs were found to be compliant with the assessment standard at the initial audit and 47 (74.6%) were found to be not compliant in this standard. At the initial audit, key areas of non-compliance included:

- no assessment of required communication skills, in both classroom and online etc;
- insufficient evidence on which to determine competence;
- informal assessment of practical skills;
- no assessment of demonstrated use of Personal Protective Equipment;
- poor options in multiple-choice questions, with an example recorded of football field and supermarket as options for answers;⁶ and
- in relation to online assessment, the correct answer was achieved by continued 'button pressing'⁷.

Industry and stakeholder comments

Stakeholder concerns about poor assessment of competency and communication skills related to both online and face-to-face assessment although the concerns were more prevalent about the online method.

One concern of industry was the perception that students are provided with the answers to questions. This was not observed by auditors, but this is not necessarily because the perception is invalid. Several respondents to the survey suggested that ASQA send auditors to courses as 'secret shoppers'.

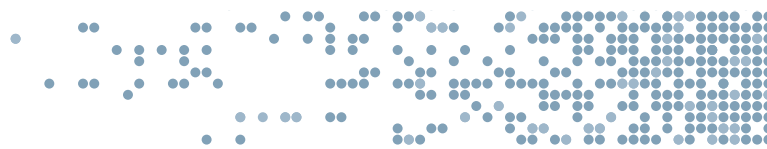
Employers and some work health and safety regulators have also queried how people with few English skills have apparently completed assessments for the unit. One respondent said "*a foreman who is supervising construction works, has an online White Card, has extremely poor literacy and could not have completed the course himself.*"

I have seen this course degraded, which is putting lives at risk. I know of trainers who give people with very poor English the answers...or even have 40 people in the room and tell them what to write. (RTO)

The unit addresses the literacy issues that participants may experience by requiring them to demonstrate competency by such activities as "identify and explain" and "identify and discuss" which would involve the trainer conversing with the participant to assess the learning has taken place rather than relying on a written task. (work health and safety regulator)

⁶ Such options may be called 'distractors'

⁷ 'Button pressing' refers to the assessment process in the online environment whereby a student after selecting an incorrect answer, can simply select other answers until the correct one is selected.



Examples of good practice

A number of examples of good practice by RTOs were identified during the audits including:

- moderation of assessment that resulted in the RTO providing further opportunities for practical skills assessment;
- routine validation of assessment; and
- in relation to online assessment, questions were selected from a bank of questions, so students cannot easily select the correct choice by 'button pressing'.

5.6.5 Information to trainees - Standard 16.3

The majority of RTOs (79.4%) were compliant against this standard at the initial audit. However, of the 20.6% that were not compliant, it was found that there is some variation in the quality and accuracy of information provided to students before enrolment.

Following the opportunity to rectify the non-compliance(s) identified at the initial audit, the proportion of RTOs found to be not compliant with the Assessment Standard can be expected to fall from 20.6% after the rectification period of 20 working days.

Requirements of the standard

The standard requires that before clients enrol or enter into an agreement, the RTO must inform them about the training, assessment and support services to be provided. This would include, for example, any attendance requirements. The RTO must also inform them about their rights and obligations.

Requirements of the training package

The unit requires information on the different regulatory requirements for each jurisdiction to be clarified to students. As stated in the Unit Descriptor *"licensing requirements will apply to this unit of competency depending on the regulatory requirements of each jurisdiction"*. This should be made clear to students prior to enrolment, particularly for the online programs, given that some regulators do not accept online training and assessment for the purposes of issuing a White Card.

The provision for students with special needs, including language and literacy, should also be explained.

Areas of non-compliance

Fifty (79.4%) RTOs were found to be compliant, and 13 (20.6%) RTOs audited were not compliant with this standard at the initial audit. Key areas of non-compliance included:

- assistance with assessment for students with special needs not explained; and
- different regulatory requirements were not always explained.

Following the opportunity to rectify the non-compliance(s) identified at the initial audit, the proportion of RTOs found to be not compliant with the Assessment Standard can be expected to fall from 20.6% after the rectification period of 20 working days.

5.7 Implications of short duration delivery

Duration of delivery (or volume of learning) for the White Card is not currently included in the training package and the proposed changes to the Australian Qualifications Framework (AQF), to come into effect from 1 January 2015 that relate to volume of learning are at the qualification not unit level. Therefore, the AQF changes do not directly address duration of delivery issues in relation to the unit of competency CPCCOHS1001A *Work Safely in the construction industry*.

In relation to assessment Standard 15.5 (see 5.6.4), 74.6% of RTOs audited for this review were not compliant at the initial audit against this standard. It is reasonable to conclude there would be a direct relationship between inadequate assessment and short duration of delivery by RTOs of the unit of competency CPCCOHS1001A *Work safely in the construction industry*.

Of particular note in the audit outcomes is the duration of the training and assessment strategy. This was a particular focus in the audits given concerns expressed by stakeholders about short duration impacting on quality of outcomes. Also significant is the comparison of the duration of the training and assessment strategy across face-to-face and online methods.

Some 35 (74.5%) of the 47 RTOs in the sample audit are using a face-to-face delivery and assessment strategy as shown in Table 7. Of these, one RTO (2.1%) has a strategy of less than four hours duration. Twenty-nine RTOs (61.7%) have strategies with a duration of four hours to less than six hours. Only five (10.6%) of the RTOs with a face-to-face delivery have a program of six hours duration or more.

For the 12 RTOs (25.5%) using online delivery, four (8.5%) have strategies with a duration of less than four hours. However, through evidence sighted at the audits, most students in the online method completed the training and assessment in less than one hour. Eight RTOs (17%) complete the program in four to less than six hours, with none taking six hours or more.

The data relates only to the audit sample undertaken for the review and does not include the 16 re-registration audits of RTOs.

Table 7: Method and duration of program

Duration (in hours)	Mode of delivery and assessment					
	Face-to-face		Online		Total	
	Number	Proportion (%)	Number	Proportion (%)	Number	Proportion (%)
Less than 4 hours	1	2.1	4	8.5	5	10.6
4 hours or more, but less than 6 hours	29	61.7	8	17	37	78.7
6 hours or more	5	10.6	0	0	5	10.6
Total of RTOs	35	74.5	12	25.5	47	100.0

Source: ASQA, 2012.



The Construction and Property Services Industry Skills Council in its 2012 *Delivery and Assessment Guide*, *WELL Resource for CPCCOHS1001A Work safely in the construction industry* recommends a duration of six hours for the delivery and assessment of the unit.

While this is a guide it is a statement from industry of its expectations⁸. Where an RTO wishes to use a training and assessment strategy that varies from this guide, there must be *effective consultation with industry*. The large percentage of RTOs (89.3%) delivering the program in less than six hours, is inconsistent with the recommendation from the Industry Skills Council. There is no evidence to indicate that where a shorter duration of delivery occurred, that it related to the specific needs of the target groups for these programs. An example of where a shorter duration may be appropriate would be where all students had previous experience relevant to the construction industry. The audits identified a range in program duration from as little as 20 minutes to an hour in an online environment to seven hours in a face-to-face environment.

This finding of short durations that are not in alignment with the Industry Skills Council advice was replicated in the survey findings as outlined in Chapter 4 and given the concerns expressed by industry about short duration of training and its impact on the students' competency and potentially comprised safety on construction sites, it confirms there is a significant issue.

Volume of learning in the training package

The concerns about short durations raise the question of whether duration or volume of learning should be included in the training package.

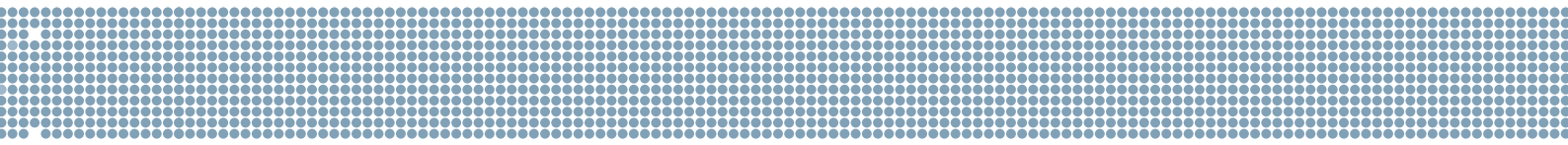
Currently there is no reference in either the training package or in the *Standards for NVR Registered Training Organisations 2012* to duration of training or volume of learning. This means that when ASQA audits, it is not able to require evidence that a specified course duration has been met or that if it has not been met, the RTO can provide clear reasons for a shorter duration that are related to the learning needs of the group, such as prior experience relevant to the competencies being assessed.

Some stakeholders consider that the notion of duration is in fact incompatible with the principles of competency-based training. However, there are new developments in relation to specification of the volume of learning for qualifications. The volume of learning of qualification types is described in the Australian Qualifications Framework qualification type specifications (Australian Qualifications Framework Council 2013, pp.23-66). An explanation of volume of learning and an excerpt of the qualification specification types is in Appendix F.

The volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes specified for a particular Australian Qualifications Framework qualification. It is expressed in equivalent full time years. (Australian Qualifications Framework Council 2012, p.2)

The Australian Qualifications Framework Implementation Arrangements require that from 1 January 2015, all new enrolments will be in qualifications that meet the requirements of the Australian Qualifications Framework. In turn, Standard 8 of the NSSC - *Standards for Training Packages* requires that qualifications comply with the Australian Qualifications Framework specification for that qualification type (National Skills Standards Council 2012, p.3). This means that as Industry Skills Councils progressively redevelop their training packages to meet the *Standards for Training Packages*, they will also need to address the volume of learning issue to ensure compliance with the Australian Qualifications Framework. This will not, however, address the issue of short duration of White Card training as the Australian Qualifications Framework requirements are at qualification and not unit level. Approaches to address the issue at unit level are considered in the final chapter of this report.

⁸ As noted in Chapter 1 this is now the only national advice provided about duration of the training program with the 2012 *Construction Code of Practice* not including any reference to duration and method of delivery.



Although there is not yet a reference in the training package to volume of learning, the notion that 20 minutes to an hour is sufficient for both delivery and assessment for an average learner with no prior experience, would be difficult to justify.

It is also difficult to envisage that the requirements of the unit of competency could be met within 20 minutes to an hour. The unit details the required skills and knowledge, which the training and assessment strategy must cover, assuring through the assessment methods and the advice provided in the unit's evidence guide that students are found competent in all required skills and have all required knowledge, prior to the issuance of a Statement of Attainment.

The Construction and Property Services Industry Skills Council (2012a, p.34) advises that:

Generic requirements:

- *assessment must address the scope of the unit of competency and reflect all components;*
- *a range of assessment methods/evidence gathering techniques must be used to determine competency;*
- *evidence must be gathered with participants working in a construction context; and*
- *assessment should replicate workplace conditions as far as possible.*

5.8 Verifying the identity of students

Concerns about inadequate identity checks of people receiving their training in the online environment are one of the significant reasons that a number of employers, regulators and RTOs have called for this strategic review. These concerns were outlined in Chapter 4.

In this section the issue of identity verification, including stakeholder views, is explored together with current practice identified through the audits and the reliability of such practice. The implications of data about current delivery and options for reliable verification of identity are outlined.

The audits found in relation to verification of identity that:

- **the potential for identity fraud in relation to online delivery and assessment is one of the most significant concerns held by stakeholders as it has the potential to compromise the safety objectives of the training;**
- **most, but not all, of the RTOs audited who are delivering face-to-face programs are checking the identity of enrolling students;**
- **the current methods of verifying identity for online assessment are inadequate to provide assurance of the identity of the person completing the assessment;**
- **the number of persons substituted for the enrolled students may be small but there is no way to quantify the level of fraud;**
- **as 95% of White Cards were achieved through online assessment of the 47 RTOs audited, there is potentially a high risk of identity fraud; and**
- **the use of an “accredited third party” to verify the identity of the person sitting the assessment appears to provide the strongest assurance of identity if online delivery and assessment is to continue.**



5.8.1 Online assessment, student identity and stakeholder perspectives

Work health and safety regulators have divided views on the merits of online training for the White Card. One regulator acknowledges that online training is more accessible and convenient as it can be undertaken anytime anywhere. This is particularly true for workers who live in remote regions where there is limited or no access to any other form of training. Online programs are also significantly cheaper. However, this regulator advises that extensive complaints have been made to it about the range of concerns with online delivery, including potential for identity fraud, concerns about inadequate assessment to meet the requirements of the unit and inadequate supports for people with language or literacy issues. The regulator indicates that until such time as these issues are adequately addressed and resolved it will continue to specify face-to-face training as the delivery method for White Card training.

Some work health and safety regulators that accept online delivery and assessment require the RTOs in their jurisdictions to check the identity of 5% of students. This is in order to detect any identity fraud. There have been many allegations made in the context of the review of identity fraud. No online provider audited for the review checked identity of all its students. However, it is not possible from these arrangements to be able to estimate the extent to which people might substitute for the enrolled students to complete the assessment for the White Card. Thus, it is not possible to quantify any level of fraud.

What is clear, however, is that the risk or potential for fraud appears to be significant. Other comments received in the context of the review from online students included:

- *I completed an online course using the details of my dog;*
- *My mother did the course as I was busy; and*
- *The boss does the course for the [poor English]... speakers.*

The concern is that it defeats the purpose of the White Card as a safety induction mechanism if there is a substitution in the online environment for the student completing the assessment, (or as has been alleged, the provision of answers to students in a classroom environment by the person delivering training assessment).

The question for the industry is whether the convenience of online programs, without adequate identity checks, is worth the risk of some degree of cheating or fraud.

Proponents of online delivery have in some cases invested heavily in quality software and are continuing to do so. It has been suggested that quality software (meeting the requirements of the training package), with the use of technology such as Skype, could address both the identity and assessment issues.

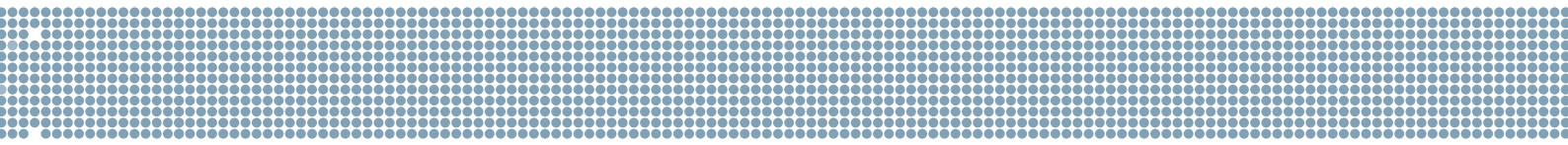
Standard 15.5(b) requires assessments to be conducted in accordance with the principles of assessment and the rules of evidence, therefore requiring RTOs to comply with the authenticity rule of evidence.

It follows, therefore, that it is an obligation for RTOs that they check the identity of persons whom they enrol in a program and to whom they issue a credential. This applies to people enrolling in both a classroom and an online learning environment.

Sections 105-106 the *National Vocational Education and Training Regulator Act 2011* includes penalties for 'issuing a VET statement of attainment without providing adequate assessment':

The *National Vocation Education and Training Regulator Act 2011* also provides that it is an offence if the training organisation:

Did not satisfy itself that the VET student had successfully satisfied the requirements of the units of competency", prior to issuing a statement of attainment (sections 109-110).



The issue of e-assessment has been examined previously by the Flexible Learning Network that reported on the views of practitioners and auditors. The common view was that:

E-assessment was finding its place in the VET sector mostly as a form of diagnostic and formative assessment. The primary use of e-assessment for summative assessment was rare. There was little support from practitioners or auditors for the use of e-assessment as the primary form of evidence to support the signing-off of a formal qualification or certification of a skill.

The Flexible Learning Network report acknowledges the key issue that the online delivery and assessment poses for the construction industry:

At present, tensions do exist between practitioners and auditors around various forms of e-assessment. These tensions are around maintaining the reliability and validity of assessment, while also achieving flexibility and cost efficiencies.

Where a program is conducted over a period of time, of months or years for example, the relationship between trainer (or teacher) and student provides some assurance of identity, in the patterns and linguistic features of work. This is not the case for the unit CPCCOHS1001A *Work safely in the construction industry* which is conducted over the course of a number of hours (when delivered in accordance with the recommended duration), and particularly when delivered online.

5.8.2 Current identity checks

In the face-to-face learning environment it was found that some, but not all RTOs, are checking identity papers at enrolment. Some examples of practice include:

- copies of photograph identification retained on file and document number also recorded;
- use of any form of photograph identification, including passport or other occupational licence; and
- requiring 100 points of identification, similar to the practice of banks and other institutions.

In the online environment it was found that RTOs currently use a variety of forms of identity verification including:

- requirement to produce photograph identification to the webcam at commencement;
- certified identification;
- production of drivers licence;
- provision of a statutory declaration, photograph identification, witness or observer statement;
- identification checked at assessment (not enrolment) using statutory declaration, certified photograph identification, or witness statement;
- use of time and date photos during assessment; and
- a telephone call to students after assessment.

5.8.3 Are the current online checks of identity absolutely reliable?

Current online checks are not absolutely reliable. The use of photograph identification, webcams, statutory declarations and witness statements do not provide an absolute assurance of identity of the person completing the assessment. Even with the use of a webcam, it is possible that someone else can still, off camera, provide the answers to the “on camera” person.



5.8.4 Delivery activity data

While the extent of identity fraud is not known, the potential extent could be assessed via the data on the scale and volume of online delivery.

The comparative proportions of delivery via online and face-to-face methods in 2012 for the sample of 47 RTOs audited for the review is shown in Table 7 and Table 8.

Table 8: Delivery data for 2012, for the 47 RTOs sampled

	RTOs	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Total
Online	12	1,210	13,274	2,239	43,803	4,327	3,256	10,271	42,692	121,072
Non online	35	97	1,412	263	1,220	981	4	1,293	1,050	6,320
Total	47	1,307	14,686	2,502	45,023	5,308	3,260	11,564	43,742	127,392

Source: ASQA, 2013.

From the delivery activity data from the RTO sample, it emerged that in 2012, only 5% of White Cards were obtained through face-to-face delivery and assessment, with 95.0% through online delivery and assessment.

As 95.0% of White Cards were achieved through online assessment of the 47 RTOs audited, there is potentially a high risk of identity fraud.

5.8.5 Options for verification of identity in an online environment

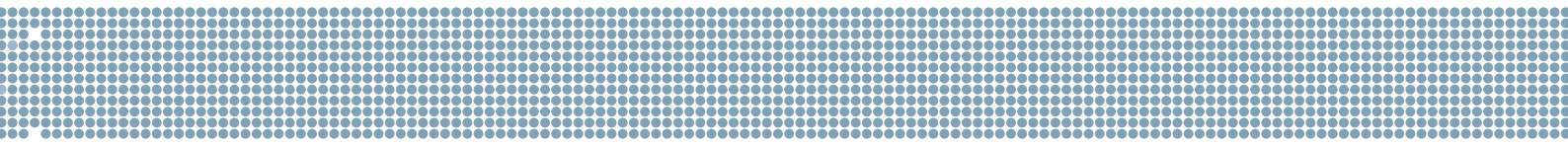
Advice was sought from the Flexible Learning Advisory Group (FLAG) about the verification of identity issue.⁹ The letter of advice is at Appendix G.

The FLAG advice assumes that the *highest level of reliability is required* in establishing student identity in the case for training and assessment leading to the issue of an occupational licence or qualification. FLAG's E-Standards Experts Group recommends the following minimum standard:

A record of candidate identity verification is required for all assessments that can be termed tests undertaken entirely online outside a controlled test environment.

The minimum acceptable level of verification is confirmation of the identity of the student by an accredited third party. The confirmation must be stored with the assessment results and the third-party must confirm that the student who receives the recognition is the same student who registered for and completed the assessment.

⁹ The Flexible Learning Advisory Group is an advisory group of the National Senior Officials Committee. As the key policy advisory group on national directions and priorities for information and communication technologies in the vocational education and training system and Adult and Community Education, it has oversight of the National VET E-learning Strategy 2012-2015.



The FLAG advice also considered the use of other available technology as a means of verifying identity but noted drawbacks:

The recommendation to consider third-party confirmation of identity as a minimum standard facilitates the compliance of students and RTOs with minimal technical resources.

The use of a web-camera to record training and assessment and to take random photos during the training offers a technical solution to support verification of candidate identity, but is not considered to be universally available nor to offer the same degree of reliability as third-party confirmation as the web camera captures do not necessarily identify the user unless other identity documents are also captured.

We suggest any use of a web-camera should include a requirement for the student to hold up a picture identification (suggest government-issued such as a driver's license) in front of the web-camera and to then pose for a second picture of themselves, for an initial identity check. This would require the training provider to compare the two images to confirm they match and for that to be deemed adequate.

Widely available applications such as Skype or virtual classrooms could be used to get a video feed from a web-camera and the student could use native screen-capture tools to capture still image of themselves.

Finally, the advice noted that new advances in technology may assist in future but are not yet sufficiently well developed or cost effective to consider.

The suggestion that an 'accredited third party' verify the identity of the person sitting the assessment appears to provide the strongest assurance of identity if online delivery and assessment is to continue.



5.9 Improvements in compliance following rectification

At the time of writing this review 32 of the 47 RTOs specifically audited for this review have been given the opportunity to rectify their non-compliance with the Assessment Standard within 20 working days. Some 19 RTOs have done this and 12 RTOs were able to rectify the non-compliances with the Assessment Standard identified at the initial audit. Of the 12 RTOs that have not yet completed this rectification process, ASQA expects six to reach compliance with the assessment standards with the remaining not compliant. If this turns out to be the case, then the true rate of non-compliance with at least one national standard the Assessment Standard is likely to fall to 27.7 % as shown in Table 9.

Table 9: Audit outcomes of the random sample of 47 RTOs offering White Card training

Audit outcome/expected audit outcome	Number of RTOs	Proportion of RTOs (%)
Compliant at initial audit	15	31.9
Not compliant at initial audit, but:		
• Rectification process is now complete and found compliant	12	25.6
• Rectification process is now complete and found not compliant	7	14.9
• Registration withdrawn by RTO	1	2.1
• Rectification process is not yet complete but expected to be found compliant	6	12.7
• Rectification process is not yet complete but expected to be found not compliant	6	12.7
<i>Total compliant</i>	33	70.2
<i>Total not compliant</i>	13	27.7
<i>Total withdrawals</i>	1	2.1
Total RTOs	47	100.0

Source: ASQA, 2013.

Chapter 6

Conclusions and recommendations

The strategic review was initiated as a result of persistent stakeholder concerns about the quality of White Card training. In particular concerns were raised by industry about inadequate assessment, in programs that were too short for trainees to obtain competencies needed and the potential for identity fraud in online training. Both concerns cast doubt on whether people issued White Cards are actually competent and have achieved the introductory knowledge and skills required to start work on construction sites.

In this review, the views of stakeholders such as employers, unions, work health and safety regulators and RTOs have been sought. The scale and nature of delivery has been examined through a survey of RTOs and the quality of delivery and assessment has been analysed through audits of RTOs delivering the unit of competency CPCCOHS1001A *Work safely in the construction industry*.

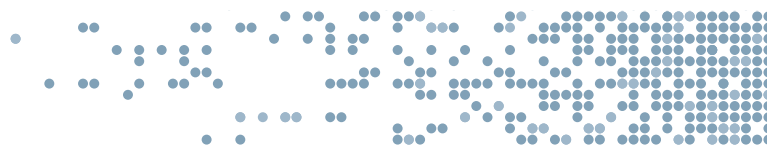
In conducting this review ASQA has found that:

- industry has lost confidence in the value of the White Card as providing an assurance of safety in the workplace for new entrants to the construction industry;
- RTOs delivering the White Card through face-to-face training and assessment have advised they cannot compete with those offering the training and assessment online;
- some delivery of the White Card is taking as little as 30 minutes;
- the majority of White Cards, 95 per cent, are being delivered through an online environment;
- no RTOs, audited for the purpose of this review, delivering in the online environment are adequately assuring the identity of students;
- the risk to achievement of the safety objective is compounded by the potential for identity fraud because identity verification in the online White Card programs is not assuring that the person completing the assessment is the person who receives the White Card; and
- the majority of training providers that were audited are compliant with most of the training and assessment standards but the majority are not compliant with the standard relating to assessment practices, potentially compromising the safety objectives of the White Card.

As a first response to the review, ASQA has requested, in accordance with its usual regulatory processes, that all RTOs found during the review to be not compliant with the standards, provide evidence of rectification. Where any non-compliance remains, ASQA will take further regulatory action including imposing sanctions.

However, it is clear that in order to systematically address the issues identified, a concerted and collaborative effort will be required by a number of stakeholders and agencies that have a responsibility for and investment in the White Card arrangements. The recommendations that follow assume that:

- maintaining the status quo is not an option given the serious concerns about risks to safety;
- there is the will and commitment to maintain the White Card but with changes to the arrangements to ensure that it achieves its objective of preparing people to work safely on construction sites; and
- that any changes to the unit of competency CPCCOHS1001A *Work safely in the construction industry* will need to occur through close collaboration between industry, the Construction and Property Services Industry Skills Council and the work health and safety regulators to ensure that the outcomes are feasible and can be applied consistently across jurisdictions.



The recommendations in this chapter focus on achieving change in the key areas that are undermining confidence in the White Card.

The key areas for action are:

- industry, through the Construction and Property Services Industry Skills Council, to consider strengthening its requirements in relation to assessment and program duration through the training package where needed, especially where the training package requirements are unclear or ambiguous;
- work health and safety regulators to give consideration to more consistent requirements across Australia for White Cards to avoid the current variation of White Card arrangements that impact on the consistent quality of delivery of White Card training;
- the National Skills Standards Council to consider strengthening and clarifying the *Standards for NVR Registered Training Organisations* in relation to assessment and the requirements for validating the identity of those being assessed; and
- ASQA to treat White Card training as a high-risk area requiring greater regulatory scrutiny.

RTOs are required under the training and assessment strategies standard (Standard 15) to meet the requirements of the relevant training package or VET accredited course. Stronger industry specification of assessment requirements would provide greater clarity for RTOs and significantly improve ASQA's capacity to regulate against clearer, robust specifications.

Industry improving assessment and program quality through training package requirements

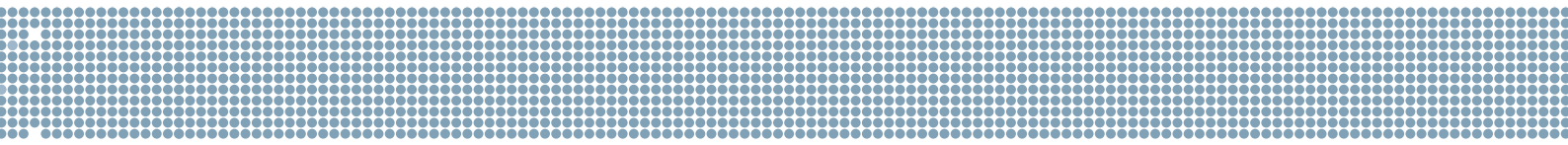
All Industry Skills Councils are required to review their training packages to comply with the 2012 *Standards for Training Packages* by 31 December 2015. The new standards significantly strengthen the assessment requirements to be specified in training packages for each unit of competency. It is, therefore, proposed that the Construction and Property Services Industry Skills Council give consideration to prioritising the redevelopment of the unit CPCCOHS1001A *Work safely in the construction industry* so that it is compliant with the new *Standards for Training Packages* as soon as possible.

Early compliance with the new *Standards for Training Packages* will ensure that the assessment requirements of the unit are spelled out, including performance evidence, knowledge evidence and assessment conditions. In addition the assessment requirements should:

- clearly specify any requirement for skills demonstration in a simulated workplace context as the review found that of the 31.7% of RTOs found not compliant at the initial audit in the training resources standard (Standard 15.3) during the review, many are not providing sufficient resources to meet the requirements of the unit of competency, particularly in relation to a simulated construction environment; and
- highlight the requirement to confirm the authenticity of the assessment evidence in an online assessment environment by verifying the identity of the person undertaking the assessment.

The short duration of many White Card programs, particularly, but not only those delivered online, was a key concern of stakeholders. The review found that 22.3% of RTOs were not compliant in relation to their training and assessment strategies at the initial audit and that:

- programs of short duration are not providing a sufficient opportunity for the requirements of the unit of competency to be met; and
- the majority of RTOs conducting short-duration programs are doing so via online delivery and assessment.



The 2012 *Standards for Training Packages* require inclusion of the volume of learning so that qualifications comply with the AQF requirements by 31 December 2015. However, the volume of learning requirements are at qualification and not unit level and, therefore, may not address the concerns about short-duration programs used for delivery of this unit. It is, therefore, proposed that the Construction and Property Services Industry Skills Council should, during the review of the unit, give consideration to including a mandatory minimum duration for training and assessment, subject to flexibility in cases where learners might have prior industry experience. The follow up to this review ought to involve industry and the work health and safety regulators so that any mandatory requirements for performance evidence and assessment conditions that will lead to greater national consistency in the provision of White Cards can be included in the revised training package covering its training and assessment.

The Construction and Property Services Industry Skills Council *Delivery and Assessment Guide 2012* currently recommends a duration of six hours of delivery and whether this duration is still considered appropriate could be tested with industry and stakeholders during the review of the assessment requirements. The state and territory work health and safety regulators do not have a consistent position on this matter. Some are silent, some recommend six hours and some require six hours.

Inclusion of a mandatory duration in the unit that assures the assessment requirements have been met will address concerns about short durations that are compromising the integrity of delivery and assessment and will ensure that ASQA can, when auditing, require RTOs to either demonstrate they have met the duration requirements or provide evidence that any deviations are based on the specific needs of the learner group. Inclusion of volume of learning need not compromise the principles of competency-based training as there will remain flexibility for RTOs to modify duration to meet learner needs and experience.

Recommendation 1:

It is recommended that the Construction and Property Services Industry Skills Council give consideration to prioritising redevelopment of the unit of competency 'CPCCOHS1001A Work safely in the construction industry' to specify any mandatory requirements for performance evidence and a revision of any knowledge evidence requirements as soon as possible. This should include collaboration with industry and the work health and safety regulators.

RTOs in particular struggled with meeting the existing standards for assessment.

Recommendation 2:

It is recommended that the Construction and Property Services Industry Skills Council in collaboration with industry and work health and safety regulators give consideration to including the following clear specifications of assessment requirements in the unit of competency 'CPCCOHS1001A Work safely in the construction industry':

- *the stipulation of any mandatory conditions for assessment, including any requirements for skills demonstration in a simulated workplace context;*
- *the specification of the conditions under which evidence for assessment must be gathered, including any details such as equipment and materials and physical conditions for assessment; and*
- *the specification of assessor requirements including any details relating to the qualifications and experience of assessors and their industry currency.*



Program Duration

The findings of the review indicate that there is an extremely wide variation in the duration of programs that deliver the unit of competency CPCCOHS1001A *Work safely in the construction industry* and that short-duration programs make it difficult to meet the requirements of the unit of competency. Program duration is not specified in the training package but the Construction and Property Services Industry Skills Council's *Delivery and Assessment Guide 2012* does, however, recommend a duration of six hours of delivery. The state and territory work health and safety regulators do not have a consistent position on this matter. Some are silent, some recommend six hours and some require six hours. Greater clarity is needed. This lack of consistency has allowed a situation to develop where 58% of White Cards are now issued as a result of doing courses of fewer than six hours duration, and 70% of all White Cards issued in Australia are now issued in just two states, Queensland and Western Australia, where there are no minimum times required for White Card training. The diversity of arrangements set by work health and safety regulators across different jurisdictions appears to be contributing to very different quality in training arrangements for the White Card across Australia.

Recommendation 3:

It is recommended that the Construction and Property Services Industry Skills Council in collaboration with industry and work health and safety regulators give consideration to inclusion of a minimum duration of training and assessment for the unit of competency 'CPCCOHS1001A Work safely in the construction industry' and making this mandatory unless the RTO can demonstrate that the needs of the target group can be met in less than the mandated duration.

The Assessment Standard

A failure to meet the requirements of the Assessment Standard by 27.7% of providers following the opportunity for rectification after non-compliances were identified at the initial site audit is of significant concern.

The principles of assessment (fair, flexible, valid and reliable) and rules of evidence (valid, sufficient, authentic and current) that are included in the definitions section of the standards provide significant guidance to RTOs in relation to the practice of assessment, but either they are not aware of these or not using them to inform their practice. These principles and rules need to be part of the assessment standard for RTOs and a revision of this standard should be part of the national review of standards for RTOs that is currently being undertaken by the National Skills Standards Council. The problems with assessment go beyond specific action to review the assessment requirements of the White Card unit of competency. This is not just an issue for assessment of the White Card but for the VET sector as a whole.

Recommendation 4:

It is recommended that the National Skills Standards Council give consideration to including in the revised Standards for NVR Registered Training Organisations an assessment standard that explicitly includes the principles of assessment and the rules of evidence (as they are currently defined in the definitions section of the Standards).

The new assessment standard should be along the lines of: assessment must be conducted by a qualified assessor according to the principles of assessment and the rules of evidence for assessment.

The principles of assessment are that:

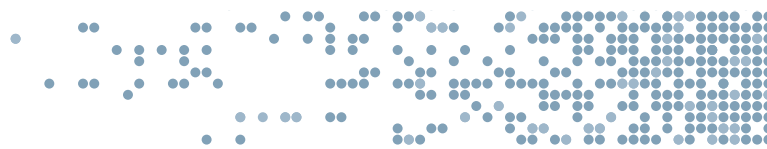
- *assessment must be fair so that an individual candidate's needs and characteristics are considered in the assessment process, there is clear communication between the assessor and the candidate so that the candidate is informed about and fully understands the assessment process, and that the candidate is able to challenge the result of the assessment to the RTO and be reassessed if necessary;*
- *assessment must be flexible where the assessment draws on a range of assessment methods appropriate to the context and recognising the existing competencies of the candidate;*
- *assessment must be valid in terms of the assessment decision being based on evidence of performance by the candidate; and*
- *assessment must be reliable in terms of consistency between different assessors on the basis of the assessment evidence used, including that the precise assessment task or measurement instrument is appropriate and accurate to determine whether the candidate has the competencies being assessed.*

Assessment must be based on the collection of evidence to ensure that it is valid, sufficient, authentic and current as follows:

- *assessment evidence must be valid so that the assessor is certain that the candidate has the skills, knowledge and attributes as described in the relevant unit of competence;*
- *assessment evidence must be sufficient so that the quality and quantity of assessment evidence is adequate to ensure that all aspects of the competency have been met and that it can be demonstrated repeatedly;*
- *assessment evidence must be authentic so that the assessor can be assured that the evidence presented for assessment is the candidate's own work; and*
- *assessment evidence must be current to the extent that assessment is of current competencies.*

The issue of verification of identity

The findings of the review indicated that RTOs, particularly those delivering online, had inadequate procedures to ensure, the person issued with the statement of attainment for the unit of competency CPCCOHS1001A *Work safely in the construction industry* is actually the person who completed the training. Standard 15.5 (b) requires that assessment must be conducted in accordance with the rules of evidence. One of these rules of evidence is authenticity, that is, that the assessor must be assured that the evidence presented for assessment is the candidate's own work. This needs to be an explicit part of the standards. Advice received from the Flexible Learning Advisory Group is that the minimum acceptable level of verification is confirmation of identity by an "accredited third party" and that the confirmation be stored with the assessment results and "the third party" must confirm the person is the student who registered for and completed the assessment.



Recommendation 5:

It is recommended that the National Skills Standards Council give consideration to, including in the revised standards, a specific requirement that RTOs validate the identity of every student's identity for the purposes of assessment by having it confirmed by an "accredited third party" and that the confirmation be stored with the assessment results, and the "third party" must confirm the person is the student who registered for and completed the assessment. These standards should state that to accept assessment evidence, an assessor must be assured that the evidence presented for assessment is the candidate's own work.

Driving systemic change in RTO practice

The systemic poor practices identified through this review indicate that many RTOs are not complying with the requirements of the unit CPCCOHS1001A *Work safely in the construction industry*, which demonstrates a clear need for them to improve their training and assessment services. Furthermore, it is apparent ASQA should continue to focus on the delivery of the unit of competency in its compliance activities.

Recommendation 6:

It is recommended that ASQA:

- *treat the unit 'CPCCOHS1001A Work safely in the construction industry' as a high-risk unit in its regulatory approach, meaning that ASQA will ensure any audit it conducts of an RTO offering this unit will include the unit as a mandatory requirement in the sample of the RTO's programs to be audited;*
- *undertake a round of national workshops, in collaboration with the Construction and Property Services Industry Skills Council, for RTOs delivering the unit of competency 'CPCCOHS1001A Work safely in the construction industry' once the revised national standards are settled to explain and reinforce the key findings of this review; and*
- *within 12 months of the workshops, conduct a series of audits targeting the delivery and assessment of this unit with a view to evaluating whether the quality of training and assessment has improved and the concerns of stakeholders have been addressed.*

Glossary

Assessment	<p>The process of collecting evidence and making judgements on whether competency has been achieved, to confirm that an individual can perform to the standard expected in the workplace, as expressed by the relevant endorsed industry/enterprise competency standards of a training package or by the learning outcomes of an accredited course.</p> <p><i>Source: 2010 AQTF User's guide to the essential conditions and standards for Continuing Registration. http://natese.gov.au/?a=69353</i></p>
Assessment guidelines	<p>The endorsed component of a training package that underpins assessment and sets out the industry's approach to valid, reliable, flexible and fair assessment.</p> <p><i>Source: 2010 AQTF User's guide to the essential conditions and standards for Continuing Registration. http://natese.gov.au/?a=69353</i></p>
Assessment tools	<p>An assessment tool includes the following components: the context and conditions for the assessment, the tasks to be administered to the candidate, an outline of the evidence to be gathered from the candidate and the evidence criteria used to judge the quality of performance (i.e. the assessment decision making rules). It also includes the administration, recording and reporting requirements.</p> <p><i>Source: 2010 AQTF User's guide to the essential conditions and standards for Continuing Registration. http://natese.gov.au/?a=69353</i></p>
Authenticity	<p>One of the rules of evidence. To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.</p>
Compliance audit	<p>An audit conducted, under s.35.1 of the <i>National Vocational Education and Training Regulator Act 2011</i>, to assess whether or not NVR RTOs continue to comply with the NVETR Act or the VET Quality Framework. They are also conducted under the <i>Education Services for Overseas Students Act 2000</i>.</p>
Non-compliance	<p>The evidence reviewed during an audit indicates that the requirements of VET Quality Framework have not been met.</p>
NVR RTO	<p>An NVR RTO is a training organisation that is registered by the National VET Regulator as a registered training organisation.</p>
OHS Also see, WHS	<p>Occupational Health and Safety</p>



Principles of assessment

To ensure quality outcomes, assessment should be fair, flexible, valid, and reliable. See also: Fairness, Flexibility, Reliability and Validity.

Fairness

Fairness in assessment requires consideration of the individual candidate's needs and characteristics, and any reasonable adjustments that need to be applied to take account of them.

It requires clear communication between the assessor and the candidate to ensure that the candidate is fully informed about, understands, is able to participate in, the assessment process, and agrees that the process is appropriate. It also includes an opportunity for the person being assessed to challenge the result of the assessment and to be reassessed if necessary.

Flexibility

To be flexible, assessment should reflect the candidate's needs; provide for recognition of competencies no matter how, where or when they have been acquired; draw on a range of methods appropriate to the context, competency and the candidate; and, support continuous competency development.

Reliability

One of the principles of assessment. There are five types of reliability: internal consistency; parallel forms; split-half; inter-rater; and, intra rater. In general, reliability is an estimate of how accurate or precise the task is as a measurement instrument. Reliability is concerned with how much error is included in the evidence.

Validity

One of the rules of evidence and one of the principles of assessment.

There are five major types of validity: face, content, criterion (i.e. predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (e.g. competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified.

It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence.

Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.

Recognition of prior learning (RPL)

An assessment process that assesses an individual's non-formal and informal learning to determine the extent to which that individual has achieved the required learning outcomes, competency outcomes, or standards for entry to, and/or partial or total completion of, a qualification.

Source: 2010 AQTF User's guide to the essential conditions and standards for Continuing Registration. <http://natese.gov.au/?a=69353>

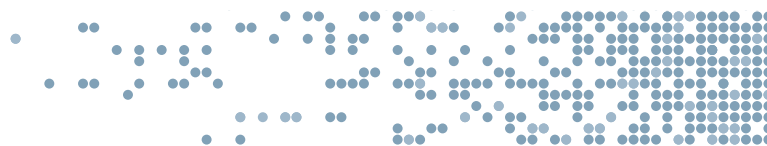
Registered training organisation (RTO)	A training organisation registered by a national, state or territory registering body.
Rules of evidence	<p>These are closely related to the principles of assessment and provide guidance on the collection of evidence to ensure that it is valid, sufficient, authentic and current.</p> <p>Validity</p> <p>There are five major types of validity: face, content, criterion (i.e. predictive and concurrent), construct and consequential.</p> <p>In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment.</p> <p>In simple terms, it is concerned with the extent to which an assessment decision about a candidate (e.g. competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified.</p> <p>It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence.</p> <p>Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.</p> <p>Sufficiency</p> <p>One of the rules of evidence. Sufficiency relates to the quality and quantity of evidence assessed. It requires collection of enough appropriate evidence to ensure that all aspects of competency have been satisfied and that competency can be demonstrated repeatedly.</p> <p>Supplementary sources of evidence may be necessary. The specific evidence requirements of each unit of competency provide advice on sufficiency.</p> <p>Authenticity</p> <p>To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.</p> <p>Currency</p> <p>In assessment, currency relates to the age of the evidence presented by candidates to demonstrate that they are still competent. Competency requires demonstration of current performance, so the evidence must be from either the present or the very recent past.</p>



Sampled audit (random sampled audit)	Reviews and examinations of any aspects of NVR RTOs operations to determine any systemic issues relating to the quality of vocational education and training.
Simulated work environment	<p>The requirement for a unit of competency to be assessed in a simulated workplace environment may be identified either within the unit of competency itself or within the relevant training package Assessment Guidelines.</p> <p>A simulated workplace may be required for the following reasons:</p> <ul style="list-style-type: none"> • The learner may not have access to a workplace. • The available workplace may not use the relevant skill, equipment or process. • Conducting assessments may be disruptive or interfere with work requirements, e.g. there may be ethical, privacy or confidentiality issues to consider. • It may not be appropriate to apply the skills in the workplace due to potential risks such as health and safety or equipment being damaged. <p>For the purposes of assessment, a simulated workplace may be described as one in which all of the required skills are performed with respect to the provision of paid services to an employer or the public can be demonstrated as though the business was actually operating.</p> <p>In order to be valid and reliable, the simulation must closely resemble what occurs in a real work environment.</p> <p>The simulated workplace should involve a range of activities that reflect real work experience. The simulated workplace should allow the performance of all of the required skills and demonstration of the required knowledge.</p> <p>It is critical that when a simulated workplace is being set up, the assessor is thoroughly familiar with the competency standard/s as well as experienced in the current circumstances and environment of the workplace.</p> <p>In deciding whether a simulation or an assessment environment has been adequately set up, the following should be considered.</p> <p>Are there opportunities to:</p> <ul style="list-style-type: none"> • Test the full range of equipment • Use up-to-date equipment and software • Reflect times and deadlines • Show the complexity of dealing with multiple tasks • Involve prioritising among competing tasks • Deal with customers, including difficult ones • Work with others in a team • Communicate with diverse groups • Find, discuss and test solutions to problems • Explore health and safety issues • Answer practically oriented, applied knowledge questions • Show the level of written and verbal expression sufficient for, but not exceeding, the work requirements.

Source: 2010 AQTF User's guide to the essential conditions and standards for initial registration.
<http://natese.gov.au/?a=69353>

Training and assessment strategy	A framework that guides the learning requirements and the teaching, training and assessment arrangements of a vocational education and training qualification. It is the document that outlines the macro-level requirements of the learning and assessment process, usually at the qualification level.
Unit of competency	Specification of industry knowledge and skill and the application of that knowledge and skill to the standard of performance expected in the workplace
Vocational Education and Training (VET)	Post-compulsory education and training, excluding degree and higher level programs delivered by further education institutions, which provides people with occupational or work-related knowledge and skills. VET also includes programs which provide the basis for subsequent vocational programs. Alternative terms used internationally include technical and vocational education and training (TVET), vocational and technical education and training (VTET), technical and vocational education (TVE), vocational and technical education (VTE), further education and training (FET), and career and technical education (CTE).
VET Quality Framework	A set of standards and conditions used by the Australian Skills Quality Authority (ASQA) to assess whether a registered training organisation (RTO) meets the requirements for registration. It comprises: the <i>Standards for NVR Registered Training Organisations</i> , the Fit and Proper Person Requirements, the Financial Viability Risk Assessment Requirements, the Data Provision Requirements, and the Australian Qualifications Framework.
WHS	Work health and safety. Work health and safety legislation aims to ensure that the same standard of health and safety protection applies to all workers in Australia regardless of the work they do or where they work





Appendices

Appendix A CPCCOHS1001A *Work safely in the construction industry*

Appendix B Strategic Industry Review Management Committee

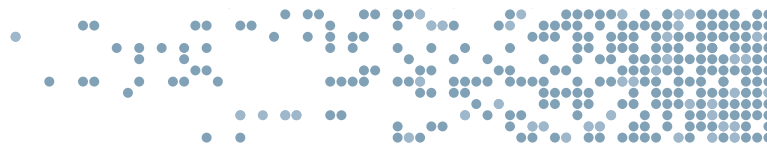
Appendix C Management Committee - Terms of Reference

Appendix D Excerpts from the *Standards for NVR Registered Training Organisations 2012*

Appendix E The Principles of Assessment and the Rules of Evidence

Appendix F Volume of learning: an Explanation, an extract from

Appendix G Flexible Learning Advisory Group



Appendix A

CPCCOHS1001A *Work safely in the construction industry*

Modification History

Not Applicable

Unit descriptor

This unit of competency specifies the outcomes required to undertake Occupational Health and Safety (OHS) induction training within the construction industry.

It requires the ability to demonstrate personal awareness of OHS legislative requirements, and the basic principles of risk management and prevention of injury and illness in the construction industry.

Licensing requirements will apply to this unit of competency depending on the regulatory requirements of each jurisdiction.

Application of the unit

This unit of competency supports the attainment of the basic OHS knowledge required prior to undertaking designated work tasks within any of the sectors within the construction industry. The unit relates directly to the general induction training program specified by the **National Code of Practice for Induction for Construction Work** (ASCC 2007).

Licensing/Regulatory Information

Refer to Unit Descriptor

Prerequisite units

Nil

Employability skills

This unit contains employability skills.

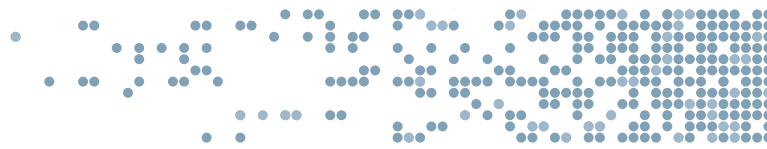
Elements and Performance Criteria Pre-Content

Elements describe the essential outcomes of a unit of competency.

Performance criteria describe the performance needed to demonstrate achievement of the element. Where bold italicised text is used, further information is detailed in the required skills and knowledge section and the range statement. Assessment of performance is to be consistent with the evidence guide.

Elements and Performance Criteria

Element	Performance Criteria
1. Identify OHS legislative requirements.	1.1. Applicable OHS legislative requirements relevant to own work, role and responsibilities are identified and explained. 1.2. Duty of care requirements are identified. 1.3. Own responsibilities to comply with safe work practices are identified and explained.
2. Identify construction hazards and control measures.	2.1. Basic principles of risk management are identified. 2.2. Common construction hazards are identified and discussed. 2.3. Measures for controlling hazards and risks are identified.
3. Identify OHS communication and reporting processes.	3.1. OHS communication processes, information and documentation are identified and discussed. 3.2. Role of designated OHS personnel is identified and explained. 3.3. Safety signs and symbols are identified and explained. 3.4. Procedures and relevant authorities for reporting hazards, incidents and injuries are identified.
4. Identify OHS incident response procedures.	4.1. General procedures for responding to incidents and emergencies are identified and explained. 4.2. Procedures for accessing first aid are identified. 4.3. Requirements for the selection and use of relevant personal protective equipment are identified and demonstrated. 4.4. Fire safety equipment is identified and discussed.



This section describes the skills and knowledge required for this unit.

Required skills

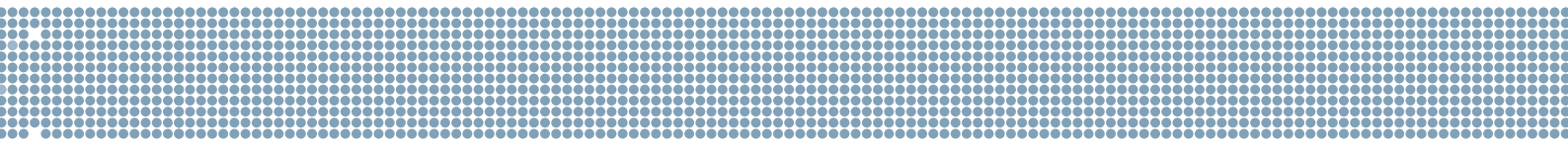
Required skills for this unit are:

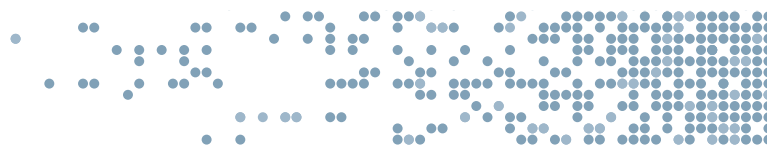
- communication skills to:
- clarify OHS legislative requirements
- verbally report construction hazards and risks
- ask effective questions
- relay information to others
- discuss OHS issues and information
- comprehension skills to:
- explain the basic OHS legislative requirements which will be applicable to own work
- explain the meaning of safety signs and symbols
- identify common construction hazards
- discuss the basic principles of risk management.

Required knowledge

Required knowledge for this unit is:

- applicable Commonwealth, State or Territory OHS legislation, regulations, standards, codes of practice and industry standards/guidance notes relevant to own work, role and responsibilities
- basic principles of risk management and assessment for construction work
- common construction hazards
- common construction safety signage and its meanings
- general construction emergency response and evacuation procedures
- general construction work activities that require licenses, tickets or certificates of competency
- general first aid response requirements
- general procedures for raising OHS issues
- general procedures for reporting OHS hazards, accidents, incidents, emergencies, injuries, near misses and dangerous occurrences
- general procedures for responding to hazards, incidents and injuries
- general workers' compensation and injury management requirements
- OHS hierarchy of controls

- 
- OHS responsibilities and rights of duty holders, including:
 - persons in control of construction work/projects
 - employers and self-employed persons
 - supervisors
 - employees
 - designers
 - inspectors
 - manufacturers and suppliers
 - own responsibilities to comply with safe work practices relating to:
 - housekeeping
 - identification of hazards
 - preventing bullying or harassment
 - smoking
 - use of amenities
 - use of drugs and alcohol
 - role of OHS committees and representatives
 - types of common personal protective equipment and fire safety equipment
 - types of OHS information and documentation.



Evidence guide

The evidence guide provides advice on assessment and must be read in conjunction with the performance criteria, required skills and knowledge, range statement and the Assessment Guidelines for the training package.

Overview of assessment	
Critical aspects for assessment and evidence required to demonstrate competency in this unit	<p>Evidence must confirm personal awareness of the following:</p> <ul style="list-style-type: none"> • applicable OHS legislative and safety requirements for construction work including duty of care • the range of common construction hazards and procedures for the assessment of risk and application of the hierarchy of control • OHS communication processes, information and documentation including the role of OHS committees and representatives, the meaning of common safety signs and symbols, and procedures for reporting hazards, incidents and injuries • general procedures for responding to incidents and emergencies including evacuation, first aid, fire safety equipment and PPE.
Context of and specific resources for assessment	<ul style="list-style-type: none"> • Resources must be available to support the program including participant materials and other information or equipment related to the skills and knowledge covered by the program. • It is recommended that the assessment tool designed specifically to support this unit of competency will provide consistency in assessment outcomes. • Where applicable, physical resources should include equipment modified for people with disabilities • Access must be provided to appropriate assessment support when required. • Assessment processes and techniques must be culturally appropriate, and appropriate to the oracy, language and literacy capacity of the assessee and the work being performed • In all cases where practical assessment is used it will be combined with targeted questioning to assess the underpinning knowledge. Questioning will be undertaken in such a manner as is appropriate to the oracy, language and literacy levels of the operator, any cultural issues that may affect responses to the questions, and reflecting the requirements of the competency and the work being performed.

Method of
assessment

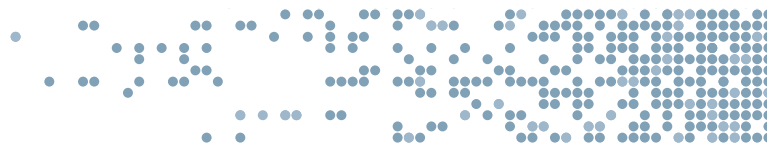
Assessment methods may include more than one of the following:

- practical assessment
- oral questioning
- written test
- work-based activities
- simulated project based activity

Range statement

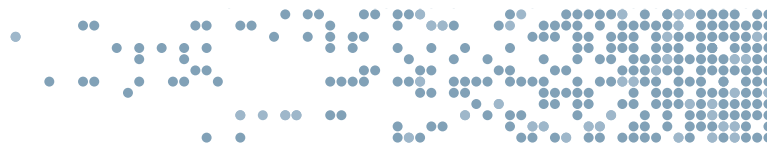
The range statement relates to the unit of competency as a whole. It allows for different work environments and situations that may affect performance. Bold italicised wording, if used in the performance criteria, is detailed below. Essential operating conditions that may be present with training and assessment (depending on the work situation, needs of the candidate, accessibility of the item, and local industry and regional contexts) may also be included.

Overview of assessment	
OHS legislative requirements relate to:	<ul style="list-style-type: none">• Australian standards• construction industry OHS standards and guidelines• duty of care• health and safety representatives, committees and supervisors• licences, tickets or certificates of competency• National Code of Practice for Induction Training for Construction Work• national safety standards• OHS and welfare Acts and regulations• safety codes of practice.
Duty of care requirements relate to:	<ul style="list-style-type: none">• legal responsibility under duty of care to do everything reasonably practicable to protect others from harm• own responsibilities to comply with safe work practices, including activities that require licences, tickets or certificates of competency• relevant state OHS requirements, including employers and self-employed persons, persons in control of the work site, construction supervisors, designers, manufacturers and suppliers, construction workers, subcontractors and inspectors.



Safe work practices include:	<ul style="list-style-type: none"> • access to site amenities, such as drinking water and toilets • general requirements for safe use of plant and equipment • general requirements for use of personal protective equipment and clothing • housekeeping to ensure a clean, tidy and safer work area • no drugs and alcohol at work • preventing bullying and harassment • smoking in designated areas • storage and removal of debris.
Risk relates to:	<ul style="list-style-type: none"> • likelihood of a hazard causing injury or harm.
Principles of risk management include:	<ul style="list-style-type: none"> • assessing the risks involved • consulting and reporting ensuring the involvement of relevant workers • controlling the hazard • identifying hazards • reviewing to identify change or improvement.
Hazard relates to:	<ul style="list-style-type: none"> • any thing (including an intrinsic property of a thing) or situation with the potential to cause injury or harm.
Common construction hazards include:	<ul style="list-style-type: none"> • confined spaces • electrical safety • excavations, including trenches • falling objects • hazardous substances and dangerous goods • HIV and other infectious diseases • hot and cold working environments • manual handling • noise • plant and equipment • traffic and mobile plant • unplanned collapse • ultraviolet (UV) radiation • working at heights.

Measures for controlling risk to eliminate or minimise hazards in accordance with the hierarchy of control include:	<ul style="list-style-type: none"> • elimination • substitution • isolation • engineering control • administrative control • personal protective equipment.
OHS communication processes include:	<ul style="list-style-type: none"> • discussions with OHS representatives • OHS meetings • OHS notices, newsletters, bulletins and correspondence • OHS participative arrangements • processes for raising OHS issues • toolbox talks • workplace consultation relating to OHS issues and changes.
OHS information and documentation includes:	<ul style="list-style-type: none"> • accident and incident reports • Acts and regulations • Australian standards • codes of practice • construction documentation and plans • emergency information contact • evacuation plans • guidance notes • job safety analyses • labels • material safety data sheets (MSDS) • proformas for reporting hazards, incidents and injuries • reports of near misses and dangerous occurrences • risk assessments • safe work method statements • safety meeting minutes • site safety inspection reports.



Designated OHS personnel includes:	<ul style="list-style-type: none"> • first aid officers • OHS committee members • OHS representatives • supervisors.
Safety signs and symbols include:	<ul style="list-style-type: none"> • emergency information signs (e.g. exits, equipment and first aid) • fire signs (e.g. location of fire alarms and firefighting equipment) • hazard signs (e.g. danger and warning) • regulatory signs (e.g. prohibition, mandatory and limitation or restriction) • safety tags and lockout (e.g. danger tags, out of service tags).
Relevant authorities include:	<ul style="list-style-type: none"> • emergency services (e.g. police, ambulance, fire brigade and emergency rescue) • OHS regulatory authority • supervisor.
Incidents include:	<ul style="list-style-type: none"> • accidents resulting in personal injury or damage to property • near misses or dangerous occurrences which do not cause injury but may pose an immediate and significant risk to persons or property, and need to be reported so that action can be taken to prevent recurrence, for example: • breathing apparatus malfunctioning to the extent that the user's health is in danger • collapse of the floor, wall or ceiling of a building being used as a workplace • collapse or failure of an excavation more than 1.5 metres deep (including any shoring) • collapse or partial collapse of a building or structure • collapse, overturning or failure of the load bearing of any scaffolding, lift, crane, hoist or mine-winding equipment • damage to or malfunction of any other major plant • electric shock. • electrical short circuit, malfunction or explosion • uncontrolled explosion, fire or escape of gas, hazardous substance or steam • any other unintended or uncontrolled incident or event arising from operations carried on at a workplace.

General procedures for responding to incidents and emergencies include:	<ul style="list-style-type: none"> • basic emergency response (keep calm, raise alarm, obtain help) • evacuation • notification of designated OHS personnel and authorities • notification of emergency services (e.g. when and how) • referring to site emergency plans and documentation.
Emergencies include:	<ul style="list-style-type: none"> • chemical spill • fire • injury to personnel • structural collapse • toxic and/or flammable vapours emission • vehicle/mobile plant accident.
Personal protective equipment includes:	<ul style="list-style-type: none"> • aprons • arm guards • eye protection • gloves • hard hat • hearing protection • high visibility retro reflective vests • protective, well fitting clothing • respiratory protection • safety footwear • UV protective clothing and sunscreen.
Fire safety equipment includes:	<ul style="list-style-type: none"> • breathing apparatus • fire blankets • firefighting equipment.

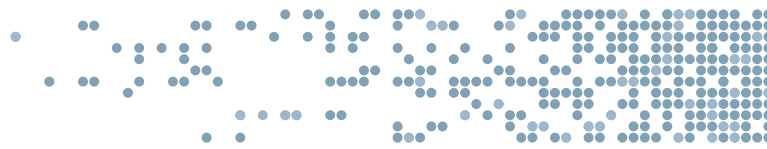
Unit sector

Construction

Co-requisite units

Nil

Functional area



Appendix B

Strategic Industry Review Management Committee

Chris Robinson (Chair)

Chief Commissioner, Australian Skills Quality Authority (ASQA)

Patricia Sherry

Assistant Director, Tertiary Quality Regulations, Systems and Reporting Branch
Department of Industry, Innovation, Climate Changes, Science, Research and Tertiary Education

Nick Proud

Construction and Property Services Industry Skills Council (CPSISC)

Dr Alex Maroya

National Training Director, Master Builders Association (MBA)

Elizabeth Greenwood

Executive Director, Industry Workforce Development House Industry Association Limited (IWDHIA)

Lindsay Fraser, AM

Assistant National Secretary, Construction Forestry, Mining and Energy Union (CFMEU)

Note: The Victorian Registration and Qualifications Authority and the Western Australian Training Accreditation Council were invited to be observers to each of the three strategic reviews ASQA undertook in 2012-2013 and provided valuable input.



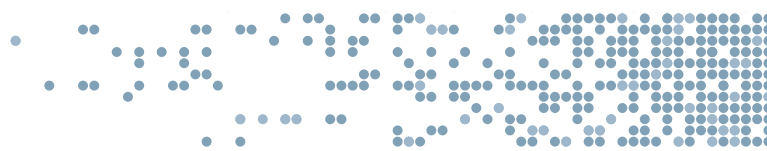
Appendix C

Management Committee - Terms of Reference

The Strategic Review of Work Safely in the Construction Industry has been established by the Australian Skills and Qualifications Authority under the authority of the *National Vocational Education and Training Regulator Act 2011* to: provide advice and findings about the efficacy of the delivery and assessment of the competency, CPCCOHS1001A *Work safely in the construction industry* by RTOs.

ASQA has established a management committee chaired by ASQA and comprising representatives from: the Construction and Property Services Industry Skills Council; the Master Builders Australia the Housing Industry Association, the Construction, Forestry, Mining and Energy Union; and the then Department of Innovation, Industry, Science, Research and Tertiary Education. The management committee will:

1. Provide considered findings on how RTOs should deliver and assess the required skills and knowledge entry level employees need to work safely on construction sites;
2. Oversee the work of the secretariat provided by ASQA to conduct the review;
3. Approve the methodology to be implemented by the secretariat to the review;
4. Oversee the consultation with stakeholders including Safe Work Australia, state and territory State Training Authorities and work safety agencies as well as employers; and
5. Provide a report to ASQA of the review's findings.



Appendix D

Excerpts from the *Standards for NVR Registered Training Organisations 2012*

Applicable *Standards for NVR Registered Training Organisations 2012* relevant to the review

SNR 15 The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:

- 15.2 Strategies for training and assessment meet the requirements of the relevant training package or VET accredited course and have been developed through effective consultation with industry.
 - 15.3 Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the training package or VET accredited course and the NVR registered training organisation's own training and assessment strategies and are developed through effective consultation with industry.
 - 15.4 Training and assessment is delivered by trainers and assessors who:
 - a. have the necessary training and assessment competencies as determined by the National Skills Standards 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.
 - 15.5 Assessment including Recognition of Prior Learning (RPL):
 - a. meets the requirements of the relevant training package or VET accredited course; and
 - b. is conducted in accordance with the principles of assessment and the rules of evidence; and
 - c. meets workplace and, where relevant, regulatory requirements; and
 - d. is systematically validated.
-

SNR 16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:

- 16.3 Before clients enrol or enter into an agreement, the NVR registered training organisation informs them about the training, assessment and support services to be provided, and about their rights and obligations.



SNR 23 Certification, issuing and recognition of qualifications & statements of attainment

- 23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the training package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:
- a. meets the Australian Qualifications Framework (AQF) requirements;
 - b. identifies the NVR registered training organisation by its national provider number from the National Register and
 - c. includes the NRT logo in accordance with current conditions of use.



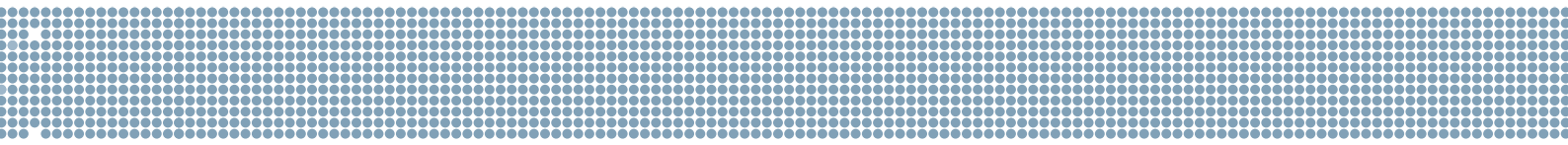
Appendix E

The Principles of Assessment and the Rules of Evidence

Standards for NVR Registered Training Organisations 2012

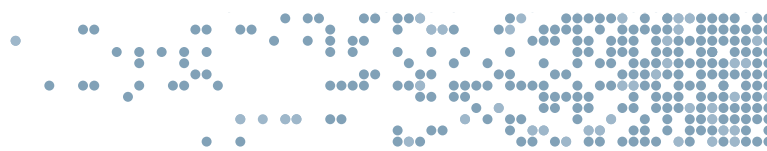
Principles of assessment are required to ensure quality outcomes. Assessments should be fair, flexible, valid and reliable as follows:

- a. **Fairness:** Fairness requires consideration of the individual candidate's needs and characteristics, and any reasonable adjustments that need to be applied to take account of them. It requires clear communication between the assessor and the candidate to ensure that the candidate is fully informed about, understands, and is able to participate in, the assessment process, and agrees that the process is appropriate. It also includes an opportunity for the person being assessed to challenge the result of the assessment and to be reassessed if necessary.
- b. **Flexible:** To be flexible, assessment should reflect the candidate's needs; provide for recognition of competencies no matter how, where or when they have been acquired; draw on a range of methods appropriate to the context, competency and the candidate; and, support continuous competency development.
- c. **Validity:** There are five major types of validity: face, content, criterion (i.e. predictive and concurrent), construct and consequential. In general, validity is concerned with the appropriateness of the inferences, use and consequences that result from the assessment. In simple terms, it is concerned with the extent to which an assessment decision about a candidate (e.g. competent/not yet competent, a grade and/or a mark), based on the evidence of performance by the candidate, is justified. It requires determining conditions that weaken the truthfulness of the decision, exploring alternative explanations for good or poor performance, and feeding them back into the assessment process to reduce errors when making inferences about competence. Unlike reliability, validity is not simply a property of the assessment tool. As such, an assessment tool designed for a particular purpose and target group may not necessarily lead to valid interpretations of performance and assessment decisions if the tool was used for a different purpose and/or target group.
- d. **Reliability:** There are five types of reliability: internal consistency; parallel forms; split-half; inter-rater; and, intra-rater. In general, reliability is an estimate of how accurate or precise the task is as a measurement instrument. Reliability is concerned with how much error is included in the evidence.



Rules of evidence are closely related to the principles of assessment and provide guidance on the collection of evidence to ensure that it is valid, sufficient, authentic and current as follows:

- a. **Validity:** see Principles of assessment.
- b. **Sufficiency:** Sufficiency relates to the quality and quantity of evidence assessed. It requires collection of enough appropriate evidence to ensure that all aspects of competency have been satisfied and that competency can be demonstrated repeatedly. Supplementary sources of evidence may be necessary. The specific evidence requirements of each unit of competency provide advice on sufficiency.
- c. **Authenticity:** To accept evidence as authentic, an assessor must be assured that the evidence presented for assessment is the candidate's own work.
- d. **Currency:** Currency relates to the age of the evidence presented by candidates to demonstrate that they are still competent. Competency requires demonstration of current performance, so the evidence must be from either the present or the very recent past.



Appendix F

Volume of learning: an Explanation, an extract from

Australian Qualifications Framework Council www.aqf.edu.au

© Australian Qualifications Framework Council, Issued November 2012

“The volume of learning, along with the breadth and depth of the knowledge, skills and application of the knowledge and skills determined for a qualification, defines the complexity of the qualification.

The volume of learning determined for a qualification must fall within the range provided in the descriptor for the qualification type.

The concept of ‘typically’, used to describe the volume of learning, is intended to provide some flexibility in relation to pathways into and from AQF qualifications that are incorporated into the design of the qualification. It is not intended as justification for not applying the requirement.”

Volume of learning applied

It is the responsibility of organisations developing and/or accrediting qualifications to exercise professional judgment to ensure that design of programs of learning leading to qualifications enables students to achieve the learning outcomes for both the qualification type and the discipline. Decisions about design of qualifications must take into account students’ likelihood of successfully achieving qualification outcomes and also must ensure that integrity of qualification outcomes is maintained. Those developing and/or accrediting qualifications should be able to provide a pedagogical rationale to justify a decision about the volume of learning.

The volume of learning allocated to a qualification should include all teaching, learning and assessment activities that are required to be undertaken by the typical student to achieve the learning outcomes. These activities may include some or all of the following: guided learning (such as classes, lectures, tutorials, online study or self-paced study guides), individual study, research, and learning activities in the workplace and assessment activities.

The teaching, learning and assessment activities are usually measured in equivalent full time years. The generally accepted length of a full time year, used for educational participation, is 1200 hours.

The volume of learning allocated in the design of a qualification may vary depending upon:

- the level of the previous qualification required for entry
- whether the purpose of the qualification is for deepening or broadening of knowledge and skills, or
- whether the qualification leads to professional outcomes or is generalist in purpose.

It would be usual for the maximum volume of learning to be allocated to qualifications designed for:

- building on a previous qualification in a different discipline regardless of the level of the previous qualification
- those that build on a qualification from any lower level and
- those that require workplace, clinical or professional practice.

If the minimum volume of learning is allocated to a qualification, the components of the program of learning must be predominately or entirely at the level of the qualification type.

If credit, such as through articulation arrangements, contributes to the volume of learning the learning outcomes for the qualification must be achievable despite the reduced volume of learning.

Volume of learning applied in delivery

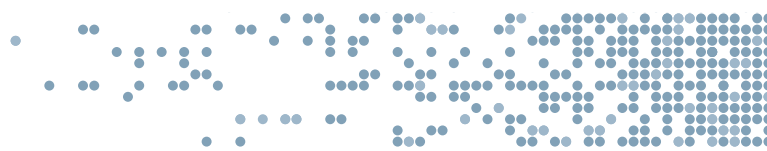
The duration of the delivery of the qualification may vary from the volume of learning specified for the qualification. Providers may offer the qualification in more or less time than the specified volume of learning provided that delivery arrangements give students sufficient opportunity to achieve the learning outcomes for the qualification type, level and discipline.

Students may be fast-tracked through the qualification, for example by providers offering three semesters per year, longer study hours in the traditional two semester model, or intensive periods of study. Conversely, some cohorts of students may be offered a longer duration of delivery to support their successful achievement of the qualification outcomes. Students may be offered more self-paced methodologies, including online delivery and workplace delivery, which will vary the duration required to achieve the learning outcomes. The duration may be reduced for individual students if credit towards the qualification is given in the form of credit transfer, recognition of prior learning or advanced standing.

Provider decisions about the duration of the delivery of a qualification must take into account the students' likelihood of successfully achieving the learning outcomes and ensure that integrity of the qualification outcomes is maintained. If the duration of delivery is substantially different from the volume of learning allocated to the qualification, providers should be able to provide pedagogical rationale to support the variation."

Volume of learning for each qualification type

Senior Secondary Certificate of Education	typically two years
Certificate I	typically 0.5-1 year
Certificate II	typically 0.5-1 year
Certificate III	typically 1-2 years. Up to 4 years may be required to achieve the learning outcomes though a program of indentured training/employment.
Certificate IV	typically 0.5-2 years. There may be variations between short duration specialist qualifications that build on knowledge and skills already acquired and longer duration qualifications that are designed as entry level work.
Diploma	typically 1-2 years
Advanced Diploma	typically 1.5-2 years
Associate Degree	typically 2 years
Bachelor Degree	typically 3-4 years
Bachelor Honours Degree	typically 1 year following a Bachelor Degree.
Graduate Certificate	typically 0.5-1 year
Graduate Diploma	typically 1-2 years
Refer to Australian Qualifications Framework qualification type specifications for information about Masters Degree and Doctoral Degree.	



Appendix G

Flexible Learning Advisory Group

Extract from a letter from the Director, FLAG Support, February 2013, to ASQA.

Re: VET candidate identity verification for tests undertaken entirely online

I am writing in response to your letter of 6 February 2013 requesting advice from the Flexible Learning Advisory Group (FLAG) about how training providers can effectively verify the identity of students undertaking short courses delivered and assessed online.

The processes that should be applied to verify the identity of individual candidates depend to some degree on the level of reliability ASQA requires.

If the highest level of reliability is required (and we assume this is the case for training and assessment leading to the issue of an occupational licence or qualification), then the following minimum standard is recommended by FLAG's E-Standards Experts Group:

A record of candidate identity verification is required for all assessments that can be termed tests undertaken entirely online outside a controlled test environment.

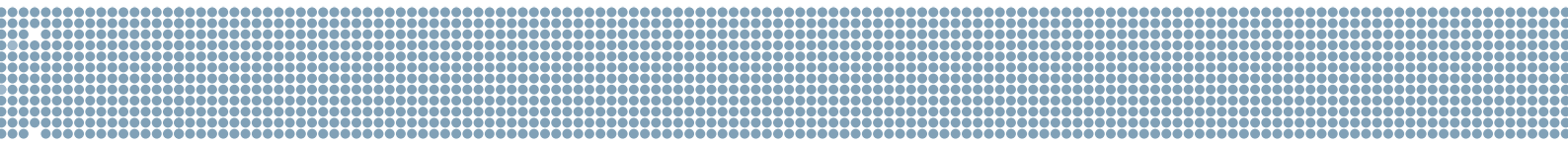
The minimum acceptable level of verification is confirmation of the identity of the student by an accredited third party. The confirmation must be stored with the assessment results and the third-party must confirm that the student who receives the recognition is the same student who registered for and completed the assessment.

The recommendation to consider third-party confirmation of identity as a minimum standard facilitates the compliance of students and RTOs with minimal technical resources.

The use of a web-camera to record training and assessment and to take random photos during the training offers a technical solution to support verification of candidate identity, but is not considered to be universally available nor to offer the same degree of reliability as third-party confirmation as the web camera captures do not necessarily identify the user unless other identity documents are also captured.

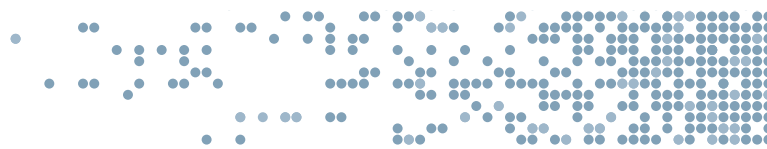
We suggest any use of a web-camera should include a requirement for the student to hold up a picture ID (suggest government-issued such as a driver's license) in front of the web-camera and to then pose for a second picture of themselves, for an initial identity check. This would require the training provider to compare the two images to confirm they match and for that to be deemed adequate.

Widely available applications such as Skype or virtual classrooms could be used to get a video feed from a web-camera and the student could use native screen-capture tools to capture still image of themselves.



We are aware of emerging biometric testing technologies to verify student identity, such as keystroke analysis; voice, face and iris recognition; hand geometry and fingerprinting. However we are of the view that these technologies are generally not sufficiently well developed or cost effective to recommend as a minimum solution in the VET context at this time. We have noted, for example that Coursera are now piloting an identity checking service based upon keystroke analysis and an uploaded photo id¹⁰ but it is a proprietary solution and for formal recognition the American Council on Education's College Credit Recommendation Service still requires the students to take an online proctored exam through a third-party provider. This indicates that there is more work to done before this approach is accepted as entirely viable.

¹⁰ <http://blog.coursera.org/post/40080531667/signaturetrack>
and <http://blog.coursera.org/post/42486198362/five-courses-receive-college-credit-recommendations>



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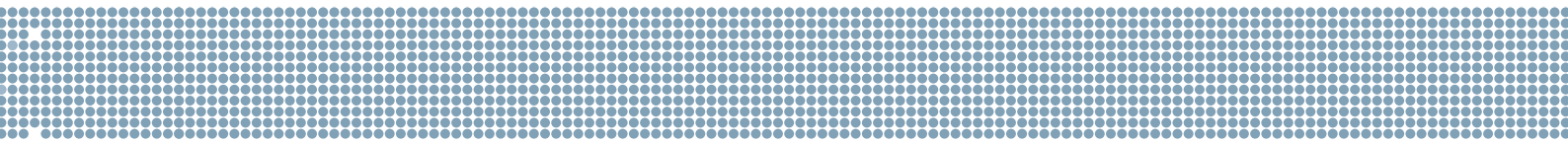
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