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## Case for Change

CPCCWHS1001 Prepare to work safely in the construction industry ('White Card')

Construction, Plumbing and Services Training Package

Submitted by Artibus Innovation  
on behalf of the  
Construction, Plumbing and Services  
Industry Reference Committee (IRC)

April 2019

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# The Case for Change

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## Administrative information

**Name of IRC(s)** Construction, Plumbing and Services IRC

**Name of SSO** Artibus Innovation

### **Name of Training Package examined to determine change required**

The CPC Construction, Plumbing and Services Training Package was examined to determine if change is required to *CPCWHS1001 Prepare to work safely in the construction industry* (Release 1).

### **Brief description of how the case for change was developed**

This Case for Change has been developed by the Construction, Plumbing and Services IRC. The development of the Case for Change focused on reviewing industry delivery issues relating to the *CPCWHS1001 Prepare to work safely in the construction industry* (also known as the 'White Card') unit of competency.

This work was commissioned by the Australian Industry and Skills Committee (AISC) following representation to them from Safe Work Australia (SWA). Safe Work Australia raised concerns that the current unit of competency does not sufficiently address the delivery related issues raised by the Australian Skills and Quality Authority (ASQA) *White Card Strategic Review*, 2013.

Safe Work Australia identified from the ASQA report the following key industry concerns regarding the delivery of the unit of competency:

- training quality was perceived as poor with many courses considered to be too short to impart sufficient skills and knowledge; lacking construction industry context; inadequate in assessing communication and correspondence skills and failing to meet the learning needs of people with language and literacy issues
- the risks of online identity fraud was considered to be poorly managed
- many people presenting for work on construction sites with a White Card were considered by their employers to not have the required workplace health and safety skills.

### *Technical Advisory Group (TAG)*

The development of the Case for Change has been supported by an IRC approved Technical Advisory Group (TAG) composed of industry stakeholders, including representatives from unions, industry associations and training providers. The TAG advised that the following issues be considered in preparation of the Case for Change:

- identified improvements in training delivery as a result of the transition to the updated unit of competency
- training delivery mode issues particularly in relation to online environments compared to face to face
- training duration and the hours allocated to training and assessment
- assessment strategies and challenges for different learner groups and geographic locations
- formative and summative assessment approaches

- verification of learner identity
- language, literacy and numeracy considerations.

A Research Paper (March 2019) developed by the SSO in response to these issues provided further insight, including:

- NCVET vocstats national enrolment data by state/territory and delivery mode
- a survey of key stakeholders, including industry, registered training organisations (RTOs) and regulators
- case studies of RTOs delivering the unit of competency

The Research Paper was also informed by the views of national regulators.

The achievement of the *CPCCWHS1001 Prepare to work safely in the construction industry* unit is a requirement for obtaining the White Card, which enables holders to work on construction sites. The White Card is the basic entry requirement for those working in the construction industry. It is also used in the mining and defence industries, and by owner-builders and other professionals whose work brings them to regularly access building sites. Attainment of this unit is an indicator to employers that an individual has achieved the basic safety competencies required.

Industry and safety regulators should have confidence that this unit meets entry level training needs, irrespective of how it is delivered. This unit does not replace industry and site-specific inductions.

This Case for Change was developed in consultation with industry stakeholders and details the proposed changes to strengthen industry confidence on the *CPCCWHS1001 Prepare to work safely in the construction industry* unit of competency.

## The Case for Change

### Driver for change

#### 1. AISC commissioned the review

In March 2016, the AISC conditionally approved for implementation the *CPCCWHS1001 Prepare to work safely in the construction industry* unit of competency, based on a review undertaken by the Construction and Property Services Industry Skills Council. In endorsing the reviewed unit of competency the AISC did not agree with a then proposed 6-hour minimum duration requirement as the 2012 Standards for Training Packages does not provide for the inclusion of specific timeframes for delivery of units of competency. The transitioned unit was released onto training.gov.au on 9 December 2016.

The AISC has since commissioned the Construction, Plumbing and Services IRC to develop the Case for Change to further review issues relating to the *CPCCWHS1001 Prepare to work safely in the construction industry* unit of competency.

The AISC has indicated that the Case for Change is to detail:

- delivery issues observed by industry
- options for addressing these delivery issues that would lead to improved safety in the industry
- the level of industry support for those options being progressed.

## Recommended changes

The TAG recommended that:

Recommendation	Description
<p><b>Authoritative identity verification standards be adopted</b></p>	<p>This Case for Change recommends the use of the Gold Standard for verification of identity.</p> <p>There are potentially serious consequences if a person fraudulently achieves competency in the <i>CPCCWHS1001 Prepare to work safely in the construction industry</i>, permitting them to gain a White Card and to work on building sites without adequate training.</p> <p>Gold standard level of identity verification should occur at the local RTO level through the use of photographic ID, for example, to ensure the identity of the learner throughout the process.<sup>1</sup></p> <p>The Gold Standard identification is:</p> <p style="padding-left: 40px;">‘appropriate for transactions with very serious consequences associated with fraudulent registration to the organisation and/or significant consequences to the community from registering a fraudulent identity, such as from issuance of a document commonly used as evidence of identity’.<sup>2</sup></p> <p>The unit of competency should include a statement specifically requiring that learner identity be verified in accordance with a standard deemed as appropriate by an authoritative source such as Commonwealth Attorney General’s Department (2016) <i>National Identity Proofing Guidelines</i> and that such guidelines be updated in the CPC Companion Volume Implementation Guide (CVIG).</p> <p>Survey and case study evidence identified variability in how and when learner identity is established. This change will standardise RTO practice and strengthen industry confidence that those who have attained this unit of competency have done so independently and without assistance.</p>

<sup>1</sup> Australian Government Department of Education and Training (n.d), *Construction, Plumbing and Services Training Package Companion Volume Implementation Guide CPC V3.PDF*, accessed 25 March 2019, p.48.

<sup>2</sup> Commonwealth Attorney General’s Department (2016) *National Identity Proofing Guidelines*, p.11.

Recommendation	Description
	<p>The Unique Student Identifier (USI) was considered as a possible alternative approach to meeting identity verification requirements. The creation of a USI, by the student or RTO on their behalf, is an essential requirement of the training system and is used for:</p> <ul style="list-style-type: none"> <li>• mandatory reporting of nationally recognised training</li> <li>• issuing of a VET qualification or statement of attainment.</li> </ul> <p>The USI is socially inclusive because it allows for exceptions for those students who do not have access to these forms of identification. These students are able to submit <u>selected alternative ID</u> to obtain a Document Verification Service (DVS) Override. Accepted alternative ID documentation include state/territory proof of age cards, licenses and registrations, utilities accounts and other Commonwealth issued notices. For example, Indigenous students can use ID documentation issued by Indigenous community organisations. Similarly, RTOs identification of students in correctional facilities can confirm their identity with the relevant state/territory corrections/justice departments.</p> <p>According to the <i>National Identity Proofing Guidelines</i>, the USI offers a high-level, Silver Standard of identity verification. For example, it provides the following local and remote level of controls: ‘Evidence of identity through use of identity information or documents from authoritative sources + information or documents verified with an authoritative source’.<sup>3</sup></p> <p>The USI does not meet the identity verification requirements of state/territory regulators. For example, SafeWork NSW requires that learners “provide the trainer with 100 points of ID”<sup>4</sup> but the Case for Change recommends allowing for this lower level of verification in very specific circumstances.</p>
<p><b>Strengthening the Assessment Conditions</b></p>	<p>The Case for Change recommends that the assessment conditions of the <i>CPCCWHS1001 Prepare to work safely in the construction industry unit</i> be reviewed, updated and strengthened to clearly outline industry endorsed assessment methods. Case study analysis identified a range of assessment methods, including electronic testing, multiple choice and open book assessments. Standardising assessment methods will alleviate industry concerns about variability and applicability of the unit.</p>

<sup>3</sup> Commonwealth Attorney General’s Department (2016) *National Identity Proofing Guidelines*, p.10.

<sup>4</sup> SafeWork NSW, (n.d.), *White Cards*, accessed 26 March 2019, <https://www.safework.nsw.gov.au/licences-and-registrations/white-cards>

Recommendation	Description
	<p>SSOs are restricted to developing competencies and cannot mandate assessment strategies. However, the Case for Change recommends that assessment methods be standardised in three ways:</p> <ol style="list-style-type: none"> <li>1. Agreement of state/territory regulators to use a mandatory assessment method to assess performance evidence and knowledge evidence.</li> <li>2. Enhancing how performance evidence and knowledge evidence are written to effectively provide consistent methods of assessment. This would require the assessment conditions to be reviewed.</li> <li>3. The IRC details specific assessment conditions. This would require industry justification.</li> </ol>
<p><b>Updating the Companion Volume Implementation Guide (CVIG)</b></p>	<p>The Case for Change recommends that further information be provided to RTOs in the CPC Companion Volume Implementation Guide (CVIG).</p> <p>The foundation skills state the LLN and employment skills essential to performance in this unit, but do not explicitly prescribe the modifications and supports for learners completing the unit. This is at the discretion of the RTO to assess and provide to learners. The current CVIG recommends that ‘RTOs are advised to assess foundations skills (language literacy and numeracy [LLN]) of prospective candidates prior to them enrolling in the qualification or related units of competency.</p> <p>Each RTO will need to decide as to whether the individual candidate possesses the LLN skills to successfully complete the qualification and what additional support the candidate will require to successfully undertake the qualification’.<sup>5</sup></p> <p>There are a range of possible strategies to achieve this. This is reflected in practice where there is considerable variation in how LLN issues are accommodated by RTOs, including pre-testing, verbal questioning, support from teacher aides, with some offering no support. However, these must be balanced against the need to maintain the integrity of unit requirements.</p> <p>ASQA’s current factsheet <i>Providing quality and training assessment services to students with disabilities</i> recommends RTOs ask learners on a universal basis if they ‘require adjustments to complete their course’. However, what is</p>

<sup>5</sup> CPC Companion Implementation Guide: Release 4.0. p.58.

Recommendation	Description
	<p>required 'should be negotiated effectively—[as] they are very individual.' ASQA also view reasonable adjustments within the broader context of the inherent requirements of the course:</p> <p style="padding-left: 40px;">Inherent requirements are the fundamental parts of a course that must be met by all students in order for them to be deemed competent. They are the abilities, skills and knowledge students need to complete the course — those components which, if removed, would compromise the learning outcomes.<sup>6</sup></p> <p>For example, RTOs delivering the unit to learners with English as a second language may make accommodations by delivering the unit bi-lingually, but must ensure that learners have the oral communication foundation skills to:</p> <ul style="list-style-type: none"> <li>• ask questions to clarify instructions</li> <li>• listen to instructions to identify key safety information</li> <li>• tell another person about a construction problem or hazard.</li> </ul> <p>Guidelines for making training and delivery adjustments have also been produced by several organisations in the VET sector, including:</p> <ul style="list-style-type: none"> <li>• Queensland Government's Department of Education and Training (2010), <i>Reasonable Adjustment in teaching, learning and assessment for learners with a disability: A Guide for VET Practitioners</i></li> <li>• TAFE NSW (2010), <i>Assessment Guidelines For TAFE NSW</i> (see Section 8 on Assessment Equity).</li> </ul> <p>Note: there are concerns that reassessment is a 'grey area' of reasonable adjustments, with some RTOs offering learners two or more opportunities to undertake assessment to achieve competency. In a competency training framework, which seeks to address industry-based risks, RTOs require advice about reassessment conditions.</p>

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<sup>6</sup> [Providing quality and training assessment services to students with disabilities](#)

## Industry support for change

Stakeholders consulted included construction industry employers and employees, registered training organisations (RTOs), state training authorities, and safety and training regulators.

Several methods were used to explore key issues, including nation-wide online survey distributed to all RTOs with the unit on scope, in-depth case studies of RTOs delivering the unit, speaking with safety and training regulators, and consulting state training authorities. The issues identified by stakeholders and how they will be addressed are described in the recommended changes above.

An outstanding issue identified by a member of the TAG is how well the unit of competency demonstrates that it meets the legislative and code of practice requirements under Safe Work Australia's Construction Work Code of Practice. It is anticipated that this issue will be addressed in reviewing the knowledge evidence, as outlined in the recommended changes section above.

The work outlined in the Case for Change takes place against a backdrop of industry reservations about the effectiveness of online delivery of the unit, and a division between regulators that endorse online delivery and those that require face-to-face delivery.

The specific methods and scale of stakeholder consultation undertaken in building the Case for Change is outlined in **Attachment B: Stakeholder Consultation Method and Scale**.

## Impact of change

### Positive Impacts

The proposed changes will:

- improve the integrity and consistency of unit delivery for learners and industry employers
- address industry concerns about how learner identity is verified
- improved accessibility of the unit by learners with LLN issues
- strengthen industry and regulator confidence in the unit of competency.

### Negative Impact

The risks of not implementing the proposed changes include:

- variability in RTOs' delivery of the unit and the continuation of 'grey areas'
- widespread industry disregard of the unit and pressure on learners to retrain through industry-accepted RTO providers
- loss of potential employees due to LLN barriers
- lost opportunity to build industry and regulator confidence in the unit's fitness for purpose as a preparatory step towards industry induction.

Estimate the timeframes to implement the proposed changes to training package(s).

- Since the vocational/job outcome of the Unit of Competency stays the same and the only changes required are the Assessment Conditions within the Assessment Requirements, a minor release can be made to the unit in accordance with Training Package Development and Endorsement Policy (page 27).
- This would allow the changes to be made almost immediately with IRC Chair approval.

## Implementing the COAG Industry and Skills Council (CISC) reforms for Training Packages

The proposed changes aim to implement key principles of COAG Industry and Skills Council reforms to training packages.

Reform	Evidence of reform being addressed
Remove obsolete and superfluous qualifications from the training system.	The unit of competency will meet baseline industry and regulatory induction skills needs and is not superfluous.
Make more information available about industry's expectations of training delivery to training providers to improve their delivery and to consumers to enable them to make more informed course choices.	The unit's conditions will be reviewed and tightened to ensure that knowledge evidence, assessment conditions, and verification of learner identity align with industry expectations for training delivery and additional information will be provided in the Companion Volume Implementation Guide.
Ensure the training system better supports individuals to move easily from one related occupation to another.	The unit of competency is the baseline for individuals to enter and complete further training in the construction industry.
Improve the efficiency of the training system by creating units that can be owned and used by multiple industry sectors.	The unit is currently being utilized by multiple industry sectors, including construction, mining and defence. The unit is efficient as it is delivered as a standalone unit, as part of an industry orientation, and as component of building and construction qualifications.
Foster greater recognition of skill sets.	Addressed in higher level qualifications for the Construction industry.

This Case for Change was agreed to by the Construction IRC

Name of Chair	Stuart Maxwell
Signature of Chair	
Date	17 <sup>th</sup> April 2019

## Attachment A: Training Package components to change

SSO: Artibus Innovation

Contact details: 373 Elizabeth Street | North Hobart | TAS | 7000

Date submitted: 1 May 2019

Training Package Code	Training Package Name	Qualification Code	Qualification Name	IRC Name	Review status	Change Required
CPC	Construction, Plumbing and Services Training Package	CPCCWHS1001	Prepare to work safely in the construction industry	Construction, Plumbing and Services IRC		

## Attachment B: Stakeholder Consultation Method and Scale

### Stakeholder Consultation

Name of Stakeholder	Detail method(s) and Scale of Consultation
<b>Industry, registered training organisations (RTOs) and regulators</b>	In 2017, nine RTOs contacted Artibus Innovation with questions about the implementation of the new unit of competency. In 2018-19, Artibus conducted a nation-wide online survey to industry employers and employees, regulators, and all RTOs with the unit on scope. There were 63 responses from 8 employers and 55 RTOs.
<b>RTOs</b>	In-depth case studies were developed of nine case studies of RTOs delivering the current unit of competency leading to 'White Card' issuance in five states/territories. These included a mix of RTOs offering the unit through online, campus-based, and hybrid models of delivery.
<b>Technical Advisory Group (TAG)</b>	A total of two meetings of the TAG were held, in October 2018 and March 2019. The TAG requested and were provided with baseline research of enrolment and delivery patterns, a national survey and in-depth case studies of key issues in the application of the unit, including training and assessment, learner verification, and reasonable adjustments. This information was presented to the TAG as a research paper at its March 2019 meeting.

Name of Stakeholder	Detail method(s) and Scale of Consultation
<b>State Training Authorities</b>	Discussions with State Training Authorities (STAs) regarding unit enrolment and delivery patterns in the latter months of 2018. Seven STAs participated in phone discussions.
<b>National safety regulators forum</b>	Artibus Innovation Project Manager presentation to national regulator forum meeting in October 2018.
<b>ASQA</b>	Artibus Innovation Project Manager met with ASQA General Manager in October 2018.