

## Industry feedback on the proposed changes – CPCCWHS1001 *Prepare to work safely in the construction industry*

### Feedback on Proposed changes to the Performance Evidence

Stakeholder	#	Industry Responses	Support	TAG Response
Employer/industry	1	<p>The scope of the project in regard to this change is to strengthen assessment conditions to clearly outline industry endorsed assessment methods and that this project originated, in part, from concerns raised about the poor quality of delivery by some training providers.</p> <p>While removal of the word orally provides greater flexibility to RTOs it also risks weakening the safety intent of the unit and learning outcomes as most communication on site and at this level is oral. More broadly, some of the performance evidence should be moved to knowledge evidence and the learner should only be assessed on what they would be expected to do on site and to demonstrate how they would do it.</p> <p>Having consulted with the state and territory Master Builders Associations it is evident that the requirements for the performance evidence should only include demonstrable skills and align what an individual having only completed this unit would be expected to do on site and how they would be expected to do it. If they are not expected to do it on site but should be aware of it then it should be moved to knowledge evidence.</p> <p>On site, an entry level worker would be expected to:</p> <ul style="list-style-type: none"> <li>• Select and correctly fit themselves with appropriate PPE for the task/risk</li> <li>• Identify risks and be able to minimise the risk to self, alert</li> </ul>		<p>Questioned advice regarding 3 different scenarios noting the unit of competency needs to cater for multiple variations and is included in over 50 qualifications</p> <p>Noted the removal of mandatory oral assessment does not mean it cannot continue to be done orally</p>

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		<p>colleagues, control some risks, know who and how to report risks, follow instructions given to reduce or remove the risk.</p> <ul style="list-style-type: none"> <li>• Respond to emergency situations by assessing own safety, alerting colleagues, knowing who and how to report the emergency; and following the instructions for action/evacuation.</li> <li>• Identify, interpret and explain verbal safety instructions, safety signs and safety symbols.</li> </ul> <p>At present the performance evidence doesn't require the learner to demonstrate that they understand the steps and the order to manage/mitigate risks or to respond to an emergency, nor is the learner required to demonstrate the link between safety warnings and the action required.</p> <ul style="list-style-type: none"> <li>- Current performance evidence for PPE is appropriate.</li> <li>- Explain or demonstrate the steps you would need to take for two different worksite risks or hazards. Each scenario needs to be in a different sub-sector of the construction industry – residential, commercial or civil construction.</li> <li>o Orally explain what the risk is.</li> <li>o Explain or demonstrate how you minimise the risk to yourself.</li> <li>o Orally alert your colleagues and orally tell them what action, if any, they should/should not do.</li> <li>o Explain if you can safely control the risk? If yes, explain or demonstrate what you would do.</li> <li>o Identify who you need to report the risk to, and orally report the risk, the key information they need to know about the scenario, and the actions you've already taken.</li> <li>o Follow instructions to reduce or remove the risk.</li> <li>o Example, I hit a pipe in the wall of a residential house and there is water spilling everywhere. In this scenario there is a risk of slipping, I keep myself safe by avoiding the water and</li> </ul>		

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		<p>call out to the other workers not to come over here because of the water. Next, if I know where the mains is, I'd turn it off. I would then find the site safety manager, verbally tell them I broke a pipe in the wall between the living room and kitchen, I've let the others know and I've turned off the mains. The safety manager speaks with the plumber to fix the problem and I mop up the water.</p> <p>- Orally explain the steps you would need to take for two different worksite emergencies. The two emergencies need to be in different sub-sectors of the construction industry – residential, commercial or civil construction.</p> <ul style="list-style-type: none"> <li>o Orally explain the emergency.</li> <li>o Explain how you assess your own safety and what you could do to improve your safety.</li> <li>o Orally make the people in your immediate area alert to the emergency.</li> <li>o Identify who you report the emergency to and orally report the emergency and the key information they need to know about the situation.</li> <li>o Follow the instructions for action/evacuation.</li> </ul> <p>- Update: Identify and explain the meaning of required safety signs and symbols, to require a quantifiable assessment</p> <p>- In response to three verbal safety instructions, three safety signs and three safety symbols identify orally the risk(s) in each and explain orally or demonstrate what action/inaction is indicated.</p> <p>Consideration could also be given to the inclusion of a statement along the lines of: 'all work must be performed to the standard required in the workplace' as is stipulated in the performance evidence for CPCCOM1012 Work Effectively and sustainably in the construction industry.</p>		<p>Noted this feedback but considered it beyond the scope of the project and its timeframes</p>

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		<p>A number of the current performance evidence should actually be knowledge evidence and the requirement that they be assessed orally should be removed. This includes:</p> <ul style="list-style-type: none"> <li>- Explain basic procedures for responding to incidents and emergencies, including types and purpose of the following fire equipment: fire blankets; fire extinguishers, including water, carbon dioxide, powder and foam; hose reels and mains.</li> <li>- Explain the purpose of job safety analyses (JSAs), safe work method statements (SWMS) and safety data sheet (SDS).</li> <li>- Explain the roles of the following designated health and safety personnel: first aid officers; work health and safety representatives; work health and safety committee members; supervisors.</li> </ul>		
RTO	2	<p>Considering the very different LLN levels of the students that I have delivered the White Card training to over the last 13 years, I feel that removing these four statements from being orally reported by the student, will decrease the actual retained knowledge of safety by the student. For example, asking students to verbally/orally to name two construction hazards &amp; then explain how the risks could be reduced or removed for these two construction hazards, is a good method to show if the student actually knows the options that are available to reduce or remove a hazard. If the question requires a written response, I find that sometimes the student is very good at remembering the answer to write but not always understanding why. I find that some of the secondary students, or those that have English as their second language, or older students who had to leave school to go to work at a very young age decades ago, are all more comfortable with the verbal/oral report rather than a written</p>	N	Noted the removal of mandatory oral assessment does not mean it cannot continue to be done orally

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		response. This is also the same for those students that are not very confident writers or spellers. If the student has a learning issue e.g. dyslexia, they are less anxious about the assessment if they are asked the question verbally/orally and do not have to write it. I have found that since the verbal/oral report was introduced into the White Card Course, student outcomes have been better as I can determine if the student actually understands the topic or not. I feel that we should leave the four instances of 'orally' in the performance evidence as is.		
Regulator/licensing Authority	3	Accept the removal of these instances	Y	
RTO	4	Agree with the removal of orally as this evidence to meet competency can be gathered through other types of assessment.	Y	
Regulator/licensing Authority/Association	5	- I'm not sure how the two instances of "orally" maintain a requirement for the provision of performance evidence for the other dot points. Both points maintain the same dot point level as the others from which "orally" has been removed. This can be taken to mean that ONLY those two dot points require an oral demonstration of performance evidence. If the aim is that the succeeding points require an oral demonstration, then it stands to reason that the succeeding points are further indented.		Noted the removal of mandatory oral assessment does not mean it cannot continue to be done orally
RTO	6	As long as the student is being asked to "explain" this infers oral context anyway, so no issue with the word "oral" being removed.	Y	
RTO	7	Change - high visibility retro reflective vest. To - high visibility vest, jacket or shirt		Advice noted  TAG agreed to action this advice and to change text to high visibility vest, jacket or shirt

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		This change is required due to the fact that industry accept these garments as a preferred safety attire		
Regulator/licensing Authority	8	I support the removal.	Y	
Government Regulator	9	No	N	
Regulator/licensing Authority	10	No	N	
Regulator/licensing Authority	11	No	N	
Regulator/licensing Authority	12	No	N	
Regulator/licensing Authority	13	No	N	
Regulator/licensing Authority	14	No	N	
RTO	15	Seems logical as an explanation is usually oral but allows for the student to provide a written response as well.	Y	
Regulator/licensing Authority	16	Agree	Y	
RTO	17	No	N	
Regulator/licensing Authority	18	<p>For assessment and/or the method of assessment to remain 'Valid' one needs to consider will 'written evidence' be a true reflection of how a learner/worker would normally respond in a typical workplace setting?</p> <p>If the worker would normally speak/verbally respond to a workplace emergency situation - then oral/verbal direct questioning assessment would be appropriate. (e.g., would a worker respond to an emergency situation by writing a short email to a colleague - No they would talk/tell/yell to alert a fellow worker).</p> <p>A work may need to write up an incident report after the situation or when safe, but when actually on a job site written</p>		Agreed and noted this scenario is catered for in the proposed changes

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		<p>communication is limited. Most written communication is undertaken when back in the office.</p> <p>Being able to orally communicate (effectively) on a jobsite (or with an assessor) is more critical than a worker being able to answer multiple choice question on a page or respond to short answer on a computer).</p> <p>I believe oral communication is vital and assessment of the learner's ability to verbally communicate is critical to the safety of self and others.</p>		
RTO	19	<p>Removing the term "orally" and not specifying its replacement, leaves the issue subject to interpretation. The default assessment methodology would potentially remain oral, thus rendering the change moot.</p> <p>Suggest a caveat that suggests oral responses are only accepted where LLN is an issue.</p>		Advice noted - the removal of mandatory oral assessment does not mean it cannot continue to be done orally and updates to the Companion Volume Implementation provide advice regarding reasonable adjustment
RTO	20	This is good. It allows for more flexibility in using a range of assessment methods.	Y	
RTO	21	No	N	
RTO/Employer	22	why is orally left in dot point 1 but removed from all the rest? identify and orally report two construction hazards		
RTO	23	<p>Simply removing the word 'orally' does not change the requirements because it still clearly states that certain tasks need to be performed 'orally'. For example, performance evidence item 2 requires that they still need to report how the risk can be reduced in 'those hazards'.</p> <p>I also:</p> <ol style="list-style-type: none"> <li>1. believe 'verbally' is the more appropriate word.</li> <li>2. The information regarding equivalence and the superseded unit is incorrect.</li> </ol>		<p>Change of wording discussed but TAG could not see sufficient reason to change oral to verbal</p> <p>SSO to check advice re equivalence and superseded</p>
RTO	24	No	N	

Stakeholder	#	Industry Responses	Support	TAG Response
Industry Association	25	If the requirement for an individual oral assessment was removed, it would keep the presentation to the mandatory 6hrs.		This was considered out of scope
RTO	26	Agree to remove verbally as assessing a group verbally can be challenging (and very time consuming). Removal will make assessing much more reliable.	Y	
RTO	27	I believe the amendments are positive and that the changes are allow more fairness to the unit and how the unit can be achieved by a diverse cohort.	Y	
RTO/Employer	28	this seems to be geared towards online learning	Y	Feedback out of scope
RTO	29	No	N	
Regulator/licensing Authority/Employer	30	no	N	
RTO	31	no objection to this change	Y	
RTO	32	Not supported. The change means that a verbal interview is still being conducted anyway for two construction hazards and for signage. It achieves a reduction in the interview workload only	N	
RTO	33	Clarification at the top covers this well.	Y	
Regulator/licensing Authority	34	No	N	
RTO	35	This seems to be a reasonable suggestion.	Y	
RTO	36	I believe this will streamline the assessment process as the collection of the oral evidence in a larger group can become quite unwieldy	Y	
RTO	37	No	N	
RTO	38	That is a good amendment. As long as mandated assessment also reflect these changes, this would be effective.	Y	
RTO	39	I presume that the concerns raised are about improving the knowledge and skills of students? If this is the goal then I fail to see how removing the requirement for students to orally report/explain will improve skills and knowledge, in fact,		



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		quite the opposite will occur. The standard of skills and knowledge will diminish along with the level of safety.		
RTO	40	Agreed...this would provide a more flexible approach	Y	
RTO	41	Yes better	Y	
RTO/Employer	42	So, removal of orally leaves this open for the "explain" to be either oral or written or both.		
RTO	43	These amendments will make assessment easier, particularly with large groups.	Y	
RTO	44	Can candidates still provide responses orally if writing skills are low?		
RTO	45	<p>I am trainer and assessor for CCFSFA.</p> <p>I would like to make a comment regarding the delivery of the CPCCWHS1001 unit.</p> <p>In my training life which now is entering its 15th year, I have watched the standard of training and assessing of this unit drop in its quality of delivery.</p> <p>What I am saying is that RTO's have taken the unit and gone from delivering with quality of training they turn it into quantity of numbers in the classroom to increase RTO's cash flow which very sad.</p> <p>I have taught this unit for 14 years and when it online instead of face to face in the classroom I believe that's when the decline started to happen.</p> <p>I had ones tell me that they had family members, or they had another worker do the course for them online. I would just shake my head in disbelief. And spend time again teaching them the basics of safety.</p> <p>I am very pleased to see that there is going to be future changes to way the unit is delivered. Hopefully, this will help RTOs to deliver the unit to the student correctly, so they are prepared for the working environment they are entering.</p>		Commentary out of scope

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		<p>I want all workers especially new starter to the construction and civil fields, to learn about safety before they go onsite.</p> <p>So, any improvement to way that RTO's delivery unit and the way it is taught to the students in classroom will help them to go home safe at night.</p> <p>So, my recommendation is to make the delivery of this unit face to face again in the classroom, and like traffic management make it requirement to have a refresher course, every five years to see that the worker is still applying what they learned.</p>		
RTO	46	<p>Change the wording from high visibility retro reflective vest to high visibility vest, shirt or jacket.</p> <p>The person must also demonstrate correctly fitting to themselves the PPE listed below:</p> <ul style="list-style-type: none"> <li>eye protection</li> <li>hearing protection</li> <li>hard hat</li> <li>high visibility vest, shirt or jacket high visibility retro reflective vest.</li> </ul>		<p>Advice noted</p> <p>TAG agreed to action this advice and to change text to high visibility vest, jacket or shirt</p>

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		<p>Rationale</p> <p>The wording changes allows for other industry accepted safety items to be part of the performance such as:</p> <p>High visibility vest</p> <p>High visibility shirt</p> <p>High visibility jacket</p> <p>High visibility retro reflective shirt</p> <p>High visibility retro reflective jacket</p> <p>Case for Change:</p> <p>The impact of the change is minimal as the requirement for 'The person must also demonstrate correctly fitting to themselves the PPE listed below' remains the same. Industry expectations regarding safety clothing include high visibility vests, high visibility shirts and high visibility jackets. Vests are generally used for office staff or visitors to the site. Workers generally wear more permanent items such as shirt or jacket or both.</p>		
RTO	47	<p>Please consider the following change during the White Card review. I have shown the change in yellow below. The requirement to fit remains it simply allows for industry accepted safety clothing (ie high vis shirt or jacket accepted). The fact that the unit currently calls for 'high visibility retro reflective vest' does not allow for an industry accepted high vis shirt or high vis jacket to be used.</p> <p>Justification: Industry expectations and safety clothing include high visibility vests, shirts and jackets. Vests are generally for office staff or visitors to the site not necessarily workers.</p>		<p>Advice noted</p> <p>TAG agreed to action this advice and to change text to high visibility vest, jacket or shirt</p>

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		<p>Extract from the unit</p> <p>The person must also demonstrate correctly fitting to themselves the PPE listed below:</p> <p>eye protection</p> <p>hearing protection</p> <p>hard hat</p> <p>high visibility vest, shirt or jacket.</p>		

### Feedback on proposed changes to assessment conditions

Stakeholder	#	Industry Responses	Support	TAG Response
Employer/Industry	1	<p>First inclusion - we have concerns that this will change the intent and focus from someone who is mainly communicating orally on site (and should therefore be assessed in this way) to written communication which is less common on site, particularly for entry level jobs. If the statement is retained suggest changing to '... practical demonstration, oral reporting and written response'</p> <p>The risks of tick boxes for oral assessments in the performance evidence could be mitigated by requiring real time recording (e.g. voice, video, zoom recording). Side note: Where state safe work associations have mandated assessment tools they should be validated and audited by ASQA prior to being issues to RTOs (The SafeWork NSW assessment tool does not meet ASQA requirements).</p>	N	Feedback noted
Regulator/Licensing Authority	2	Nil	N	
RTO/Employer	3	<p>I agree with all these inclusions, however I do wonder if, like the national High Risk Work Licences, &amp; because the White Card is issued by WorkSafe or SafeWork or equivalent counterpart in each Australian state/territory, whether the White Card should have a mandated assessment also written by Safe Work Australia so that the assessment is uniform and the same topics are being taught no matter where in Australia the student is completing the White Card.</p>	Y	Feedback noted

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Regulator/Licensing Authority	4	Supported.	Y	
RTO	5	Agree -suitable for cohort group and industry sector requirements.	Y	
Regulator/Licensing Authority/Association	6	<ul style="list-style-type: none"> <li>- Inclusion 1 - I agree with the comment made during the conference. If the statement is "must reflect a range" then a regulatory body will look for evidence of each of those methods as a minimum</li> <li>- Inclusion 2 - No comment</li> <li>- Inclusion 3 - If we are seeking to endorse a nationally recognised mandated assessment then the AR for UoC needs to explicitly state that any requirements of the mandated assessment will be adhered to and, given this is ONLY a AQF level 1 course, the RTO/assessor may apply reasonable adjustment for assessment (eg the assessor facilitating verbal responses to the written assessment)</li> </ul>		Feedback noted
RTO	7	Have you ever checked out Easy Guides Australia? James Tennant created books, that are ANTA approved, which are truly successful in delivering course content to ESL and LLN students. Worth looking at for White Card delivery.		Advice reviewed and proprietary nature of content makes inclusion unsuitable for further recommendation
RTO	8	Change - high visibility retro reflective vest. To - high visibility vest, jacket or shirt This change is required due to the fact that industry accept these garments as a preferred safety attire		Advice noted  TAG agreed to action this advice and to change text to high visibility vest, jacket or shirt
Regulator/Licensing Authority	9	Agree with the amendments.	Y	
Government Regulator	10	Appears to make allowances for varying degrees of literacy etc which is a good thing. People need to know the practical application of hazard identification and risk management not how to write an essay on it	Y	

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Regulator/Licensing Authority	11	No	Y	
Regulator/Licensing Authority	12	Take into account person where English is not there first language.		
Regulator/Licensing Authority	13	No	N	
Regulator/Licensing Authority	14	No	N	
RTO	15	Great for weeding out the cowboy/gal RTOs	Y	
Regulator/Licensing Authority	16	Agree	Y	
Regulator/Licensing Authority	17	<p>1) Yes - the Standards for RTO 2015 Principles of Assessment table 1.8 Validity requires - "a BROAD RANGE of skills and knowledge that are essential to competent PERFORMANCE". Also " assessment of knowledge and skills in INTERGRATED with their PRATICAL APPLICATION" (therefore the student should be assess while DOING/demonstrating what is asked of them at a competent level.</p> <p>2) Yes as stated above</p> <p>3) Yes. that is flexibility and fairness.</p> <p>However if a learner is unable to read and write English to a satisfactory level would it be safe for them to be on a work site in the first instance where other worker may not be able to safely and effectively communicate? Therefore is the task requires a 'written response' (e.g. complete this SWMS) but if the assessor decides to assess outside of the written requirement to accommodate the needs of the candidate this can conflict with point 1 &amp; 2 above.</p>	Y	<p>Feedback noted</p> <p>TAG recommended removal of proposed items 2 &amp; 3</p>
RTO	18	No	N	
RTO	19	No	N	

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RTO	20	None	N	
RTO	21	No	N	
RTO	22	<p>Inclusion of: Assessment processes and techniques must be appropriate to the language, literacy and numeracy requirements of the work being performed and the needs of the candidate. This is not possible where regulators mandate specific written assessment tools, or where the assessment mandates an oral response.</p>		Role of Safe Work regulators in the competency assessment process considered out of scope
Employer	23	<p>The assessment must reflect a range of methods including practical demonstration, oral and written reporting. This could be interpreted that all 3 methods of reporting are mandatory in reporting. maybe an "or" should be included. this will allow for individuals who have sever literacy issues to only verbalise the assessment not write it. this then ties into the statement of allowing students to use assessments that meet their needs.</p>		Advice noted - the removal of mandatory oral assessment does not mean it cannot continue to be done orally and updates to the Companion Volume Implementation provide advice regarding reasonable adjustment
RTO	24	This statement is still a little vague and would be difficult to determine compliance as part of audit (ie. variations in interpretation and judgement would be likely).		
Compliance Specialist	25	<p>I think if 'practical demonstration' is required, you need to be very specific about how and where remembering that it is unlawful to be on a construction site without a white card and therefore any practical demonstration must reflect that. Unfortunately, auditor misinterpretation of these types of issues is rampant. The second inclusion is unnecessary. It is a registration requirement of an RTO to meet this requirement, Artibus is venturing into an area that is not of their concern but nor is it relevant. If they don't meet the condition of</p>		<p>Feedback noted</p> <p>TAG recommended removal of proposed items 2 &amp; 3</p>



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		registration, they are sanctioned by the regulator. The statement regarding LLN is problematic in that many people undertaking this unit either don't have work already or it is such a transient workforce that the statement 'appropriate to the LLN requirements of the work being performed' is not really a good indicator.		
RTO	26	no	N	
RTO	27	None of these are really necessary, all are true but as RTO's all changes should already be included in our processes. These proposals will need to make it past the Regulator (SafeWork NSW) to ly as they mandate what we use as an assessment.		Feedback noted  TAG recommended removal of proposed items 2 & 3
RTO	28	"Assessment must satisfy the Principles of Assessment and Rules of Evidence and all regulatory requirements included within the Standards for Registered Training Organisations current at the time of assessment" this statement is not necessary as it should go without saying that RTOs must follow the principles and rules regarding assessment practice. Having it listed in this one unit, is not going to encourage a non-compliant RTO to meet the standards and I feel that it also causes confusion as this statement is not included in other units of competency, that I have seen.		Feedback noted  TAG recommended removal of proposed items 2 & 3
RTO	29	Agree	Y	
RTO	30	These changes are heavily implied in almost every unit of competency given that assessments need to comply with the Standards. I'm not sure these inclusions would make much of a difference, but it wouldn't hurt to spell it out for assessment developers, especially given the critical nature of this unit.		Feedback noted  TAG recommended removal of proposed items 2 & 3
RTO	31	no objection to these changes	Y	

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RTO	32	Supported. We use a combination of online written assessment, face to face practical, and face to face practical demonstration. We expect and support assessment to be comprehensive, to meet standards and to provide fair opportunities for students with LLN needs	Y	
RTO	33	No.	N	
RTO	34	First change provides flexibility and is welcomed.  The next two changes are pointless. RTOs are required to follow the principles of assessment regardless and are audited extensively on that requirement. There is no need to add these superfluous statements that will have no impact whatsoever on providers delivery. The new units that have just today been released have been streamlined with this type of unnecessary information removed. Please don't go adding it all back in again. Find more innovative ways to encourage consistency.	N	Feedback noted  TAG recommended removal of proposed items 2 & 3
RTO	35	What evidence is there that 'real-time assessment' is better than self-paced learning and assessment? The following appears in the unit, despite there being no evidence that it leads to a better outcome: "The assessment of performance evidence must be done by direct observation of the learner by an assessor, either by an assessor observing the learner physically and/or by an assessor observing the learner via audio and visual media in real time."		Feedback noted  Industry concerns regarding online delivery remain and this assessment condition goes some way to alleviating this
RTO	36	A large number of our students do not yet have a work position, therefore it is very important that candidates are able to articulate answers in English, given this is the	N	

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		predominant language (English) utilised in Australian Workplaces. The burden on RTO's of trying to arrange interpreters where language is an issue would be difficult to establish.		
RTO	37	The word 'reporting' (for the oral and written requirements) can be confusing. For example, if a written questioning assessment instrument is used (questions and answers), is this considered written 'reporting'? The oral 'reporting' is clearer because the Performance Evidence 1 clearer requires students to 'orally report 2 hazards'. But there isn't any other 'reporting' requirement in the Performance Evidence other than this. The inclusion of 'principles of assessment/rules of evidence' is unnecessary. This is a requirement for ALL assessment across ALL units of competency, so it is unnecessary to include.		Feedback noted  TAG recommended removal of proposed items 2 & 3
RTO	38	no	N	
RTO	39	No	N	
RTO	40	"assessment strategy to suit the candidate" this can be interpreted in different ways. It also means where mandated assessments require written responses or oral responses, this inclusion means adjustments need to be made to suit the candidates LLN requirements.  I think it's important to understand the industry candidates come from or wish to work in and what communications methods are required and this needs to be reflected in the assessment processes.		Noted
RTO	41	Makes no difference as in NSW a mandatory assessment tool is utilised		Role of Safe Work regulators in the competency assessment process considered out of scope
RTO	42	changes are appropriate.	Y	

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RTO	43	These look good.	Y	
RTO	44	<p>To assist with quality of training and to assist with the possible LLN issues I would recommend capping class numbers in the conditions of assessment. What that number is, will no doubt become a point of contention between training providers however my opinion is 10. My rational for that is, this allows students to work in pairs to complete the practical aspects of the course and creates that whole buddy check scenario to ensure your mate is safe. 10 is also a good number of people to get around in the theory aspect also. If some one is struggling with something (LLN or other) it is easier to address that one on one with out holding all the class back when you have larger numbers. I have found historically that smaller classes tend to help each other more than larger classes. This number is also easier for the instructor to what as you can bring the exercise into a smaller area rather than having people spread out everywhere.</p> <p>The next thing I strongly believe in to assist with quality of training is for the development of training materials and tests from the state training authorities.</p> <p>If this is a nationally recognised qualification then why cant the state training authorities and industry regulators get together and create all the:</p> <ul style="list-style-type: none"> <li>• Resources</li> <li>• Tests</li> <li>• Practical's</li> </ul> <p>This would all need comprehensive mapping and supplied to all RTO's and that is what they teach from and assess from. This would provide consistency of information being delivered and assessed.</p>		<p>Items related to training materials considered out of scope</p> <p>TAG noted that SWA does not support the IRCs recommendation for a national assessment instrument.</p>

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		<p>Considerations for the testing aspect would be to have:</p> <ul style="list-style-type: none"> <li>• 4 smaller tests to correspond to the elements/ performance criteria as opposed to one massive test</li> <li>• 100% pass mark</li> <li>• Ability to incorporate into our electronic testing/ learning platforms</li> <li>• Ability to use paper based as required for LLN adjustment</li> </ul>		
RTO	45	<p>Change: Inclusion of: The assessment must reflect a range of methods including practical demonstration, oral and written reporting.</p> <p>Proposed change: Delete written reporting as this skill is well beyond an AQF level 1. More appropriate wording would be practical demonstration, orally report simple issues and theory assessment.</p> <p>The AISC requested industry to update and strengthen assessment conditions to clearly outline industry endorsed assessment methods. The Case for Change recommended that the unit should require multiple assessment approaches to better ensure evidence of knowledge gained. The ability to produce a written report requires a very high level of LLN way beyond AQF level 1. Graduates at AFT Level 1 will have foundational cognitive, technical and communication skills to identify and report simple issues.</p>		Noted feedback and the TAG considered including the requirement for multiple forms of assessment has greater merit and will strengthen the assessment process

Stakeholder	#	Industry Responses	Support	TAG Response
		<p>Case for Change:</p> <p>The ability to produce a written report requires a very high level of LLN way beyond AQF level 1. Graduates at AFT Level 1 will have foundational cognitive, technical and communication skills to identify and report simple issues. This is achieved by Performance Evidence:</p> <p>The person must:</p> <p>identify and orally report two construction hazards</p>		

### Feedback on whether the content included in the CVIG is practical for RTOs

Stakeholder	#	Industry Responses	Support	TAG Response
Employer/Industry	1	We have been advised that some RTOs think that the USI alone is sufficient to verify identity. However, there is no way to determine that the USI belongs to the person doing the training. USI should be able to contribute to 100 point ID, but photo ID is needed. For online delivery the learner should hold up their photo ID next to their face at the start of each assessment activity.		Noted that the advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
Regulator/Licensing Authority	2	Yes, the identify verification requirements proposed seem sufficient.	Y	
RTO	3	As an RTO that only delivers the White Card Course face-to-face, I feel that we already have sufficient verification of learner ID and compliance to complete. On enrolment, we (our RTO) require official photo ID of the learner & check that it is them by the photo (Australian Driver's Licence, Boat Licence, Firearm Licence or passport, KeyPass or Proof of Age card, or, for secondary students under 18 who do not have official photo ID, a letter from their school (on school letterhead) stating that they are currently enrolled as a student. The letter requires the following details on it: Current date, the learner's FULL name (including middle names), their DOB, their student photo (in colour), their VSN, the year level they are currently undertaking, their current Victorian residential address, and it must be signed by either the Principal or the Registrar). We must also verify their USI, or apply for one on their behalf. We verify their signature matches the one on their ID. We also take photos of each learner		Noted that the advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice

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		wearing the correct PPE as listed in the performance evidence. If another level of ID verification is needed, then, as the White Card is issued by WorkSafe or SafeWork or equivalent counterpart in each Australian state/territory, and again I bring up the High Risk Licence system, why do we not use the same system for the applying for a White Card like RTOs do for High Risk Licences? The MyWorkSafe account in Victoria uses a third-party ID verification service, or the learner could take something similar to a L2 form to an Australia Post outlet with 100 points of ID & a passport photo (& White Cards can be issued with the photo of the learner on, just like a HRW licence).The system is already in place. Maybe it could be extended to the White Card system. I feel that RTOs have had an increase in compliance over the last few years, so why not pass some of the required "proof of ID" back on to the learner?		
Regulator/Licensing Authority	4	<p>Amend the online questions evidence to read: DOB or USI and webcam and audio capture before and during online assessment</p> <p>Amend Assessments evidence to read: Verify learner ID by DOB or USI and webcam before online assessment If these changes are not made online training without any real time, two way communications could occur and licensing Regulators may refuse to recognise training for the purpose of issuing a General Construction Induction Training Card.</p>		<p>Noted.</p> <p>AISC direction is to include advice in the CVIG not in the unit of competency.</p>
RTO	5	Yes, suitable	Y	



Stakeholder	#	Industry Responses	Support	TAG Response
RTO	6	Sounds fair enough. I don't have any issues with verification of the students at the RTO I work for.	Y	
Regulator/Licensing Authority	7	Verification of identity seems appropriate	Y	
Regulator/Licensing Authority	8	Appears to be from my understanding	Y	
Regulator/Licensing Authority	9	Yes, previous system allowed for anyone to do assessment	Y	
Regulator/Licensing Authority	10	Looks ok	Y	
Regulator/Licensing Authority	11	Yes	Y	
Regulator/Licensing Authority	12	Yes	Y	
RTO	13	Yes	Y	
Regulator/Licensing Authority	14	Agree	Y	
RTO	15	Yes	Y	
RTO	16	No	N	
RTO	17	Remove references to "or", and require visual confirmation of students against the IDs. Otherwise this remains subject to mis-use. Without photo ID the USI reference can also be misrepresented. Prevention of fraud or any other criminal activity is better than having to chase the matter afterwards.		Noted and actioned. The advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
RTO	18	Course enrolment already requires USI - this should be sufficient  Assessments within RTO should have Learner declaration (not a Stat Dec) that work is their own and the RTO Learner handbook references plagiarism and other		Noted that the advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice

Stakeholder	#	Industry Responses	Support	TAG Response
		fraudulent activities as part of their internal and quality processes to meet AQSA standards.		
RTO	19	I have serious concerns as to whether this level of identity verification is practical for RTO's. While there is a requirement around verification of identity of learner, there also needs to be a level of trust extended in the learning process. Additionally, many RTO's would be limited by such requirements around video or audio capture as the learner may have limited technological access or understanding. In addition, as an RTO we also work with VETiS students and under Education QLD guidelines, video capture of students is not allowed for privacy and child safety reasons. This would hinder working with VETiS students in these course areas.	N	Noted that the advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
RTO	20	Should not be available to be done online		
RTO	21	Where a learner provides a USI we can assume that a validated USI indicates the correct learner name and DOB. As such photo ID is all that should be required to match the photo to the name. Webcam capture during assessment is conceptually a good idea, but in practice easy to bypass as students can have all sorts of other resources not 'visible' to the webcam. Webcam will only work for facilitated online training - not true distance education		Noted
RTO	22	unable to answer this I am not an RTO. However all but the webcam someone else can enter.		
RTO	23	This is an Australian unit of competency that is sometimes delivered in other countries as part of Australian qualifications. The forms of acceptable ID listed are mostly Australian and unachievable students in developing nations thereby imposing barriers to access. Acceptance of other forms of national photo ID would		Noted that this is a recommendation only and not mandatory

Stakeholder	#	Industry Responses	Support	TAG Response
		address this issue, whilst maintaining the rigour of ID checks.		
RTO	24	This form of identity verification is more than possible, I have numerous clients who implement this level of identity verification.	Y	
RTO	25	Yes, it is	Y	
RTO	26	In South Australia online cards are not accepted, and all cards must have a current photo attached.		
RTO	27	RTO's have absolutely no say in this process as our state Regulator (SafeWork NSW) mandates that we must physically sight 100 points of ORIGINAL ID on the day of trailing. End of story - no copies allowed, no photo included in the 100 points = no training. Breaches of sighting the ID documents can means our contractual arrangement with SafeWork NSW will be cancelled. Consultation needs to take place with the Regulator, not the RTO.		
RTO	28	Yes	Y	
RTO	29	Webcam and audio capture might not be practical if a student has limited resources. Other measures are practical.	N	
Regulator/Licensing Authority	30	Yes, I think it is	Y	
RTO	31	SafeWork NSW already require 100pts of ID for this card/course		Noted that SafeWork and Government more generally is reconsidering this issue, including digital Whitecards
RTO	32	DOB, USI and ID documents are all appropriate. We use these in a face-to-face environment  These plus webcam capture are appropriate for online delivery and assessment	Y	

Stakeholder	#	Industry Responses	Support	TAG Response
RTO	33	As our RTO's only deliver to our students in NSW Public Schools, further verification of identity is not necessary. We will refer to SafeWork NSW for advice. Online delivery and assessment does not occur in NSW, SafeWork NSW mandates face to face.		
RTO	34	Online only providers need to be randomly checked. No question. Having to point out to our excited, happy and engaged first year apprentices or pre-apprentices our 'fraud and crime' department will report any discrepancy to the 'authorities' sounds just a little too far. There is a secondary check with Worksafe Victoria issuing the CI card. Can that be enough?		Noted. The advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
RTO	35	A Stat Dec is not sufficient evidence of authenticity. It means nothing. Other methods of ensuring authenticity should be included, such as password protected log-ins, and randomised question banks.		Noted that this advice is included in the proposed changes
RTO	36	As an RTO in Victoria, I do not feel online training is suitable for this unit or registration with the state authority. Online does not allow opportunity for RTO trainers and assessors to interact and determine student learning needs whilst the lesson is progressing. Phot ID should be collected at registration and a copy placed on file, where the individual is as identified in the document.	N	Noted
RTO	37	The webcam process seems way beyond the level of identity confirmation required in our school based setting.	N	Noted. The advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
RTO	38	I believe it can be achieved	Y	

Stakeholder	#	Industry Responses	Support	TAG Response
RTO	39	Yes, the level of identity verification is practical. All students are required to get/provide a USI so that makes sense and the technology to utilise webcam image capture is widely used and inexpensive. It has been around for more than 10 years so it should be utilised. Video and audio is now widely used and available so this should not be a barrier to modern organisations.	Y	
RTO	40	Already implemented a more rigorous id check in WA, NSW and Qld		Noted
RTO	41	Possible, but not necessarily practicable. This may then set a precedence for all online training by RTOs. Have there been any fraud cases specifically linked to the issue of 'white card' that has precipitated the need for these changes?		Noted. The advice included in the CVIG is recommended (not mandatory) and limitations in the USI process give reason for this additional advice
RTO	42	Yes	Y	
RTO	43	We confirm ID using these options.	Y	
RTO	44	Difficult to see how a learner can make a Statutory Declaration in relation to assessments - unlikely to have access to a competent witness at the time		

### Feedback on whether information in the CVIG useful for RTOs/what additional information would improve section

Stakeholder	#	Industry Responses	Support	TAG Response
Employer/industry	1	Is there guidance from ASQA that we could link to on what they deem to be and not to be reasonable adjustment in particular situations?	ASQA guidance	SSO to review further
Regulator/Licensing Authority	2	Yes, i consider that this information is useful for RTOs.	Y	
RTO/Employer	3	The information is relevant & useful to RTOs. "Reasonable adjustment" is something that every RTO & trainer must be aware of, and put into practice when delivering training & assessments to students. I feel that it is important to also mention the part of the Disability Standards for Education 2005 that states: "The Standards do not require changes to be made if this would impose unjustifiable hardship on the education provider." I know that training & assessments in the VET sector are mostly about the student, however, not all students have the LLN levels for certain courses, and it would be remiss to tell the student otherwise. Again, I bring up the possibility of a mandated assessment instrument. I feel that this, along with guidelines of the acceptable forms of reasonable adjustment would greatly help RTOs to both make sure the requirements & topics to be covered are complied with, but it would also assist the students to know that the assessment is the same all over Australia, and, as the White Card Course is a 1-day course, there is no time for the RTO/trainer/student to spend with one student during the course, so if the student may need to spend more time going over the topics covered (e.g. pre-course work), then it is best for all parties concerned (student, RTO,	Y	

Stakeholder	#	Industry Responses	Support	TAG Response
		trainer) to know this prior to the start of the course so that things can be put into place to assist the student to achieve their best possible outcome.		
RTO/Employer	4	Yes, meets the communication required.	Y	
RTO	5	examples for R.A. for industry perspective - example of what R A might look like for minor visual impairment for example; or writing incapacities etc.	Further examples to provided	SSO to review further
RTO	6	Change - high visibility retro reflective vest.  To - high visibility vest, jacket or shirt This change is required due to the fact that industry accept these garments as a preferred safety attire	C	Feedback noted and actioned
Regulator/Licensing Authority	7	I think it provides a level of clarity required at the RTO level.	Y	
Government Regulator	8	I do not have enough experience or understanding to comment accurately		
Regulator/Licensing Authority	9	Yes	Y	
Regulator/Licensing Authority	10	None.	N	
Regulator/Licensing Authority	11	Yes. It may also be worthwhile to acknowledge that the construction industry does include a higher than normal percentage of workers with numeracy and literacy issues which should be taken into account when presenting the information and assessing them.	Y	Noted
Regulator/Licensing Authority	12	Yes	Y	
RTO	13	Yes	Y	
Regulator/Licensing Authority	14	Agree	Y	

Stakeholder	#	Industry Responses	Support	TAG Response
Regulator/Licensing Authority	15	-		
RTO	16	No comment		
RTO	17	Provide an example of 'RA' in context  e.g LLN provide 'verbal' responses, recorded verbatim when clarity or confidence in written work is not achievable; Indigenous / Cultural understanding or exploring concepts translated to / from known or familiar cultural background to assessment context Disability / capacity limited learning structure or strategies requiring combination of on-line, online terminology, face-to-face, demonstration	Further examples to provided	SSO to review further
RTO	18	Ok	Y	
RTO	19	Not really practical where the regulator mandates specific assessment tools, which cannot be changed, and requires written short answer questions.	N	
RTO	20	unable to answer this		
RTO	21	Yes, this is useful.	Y	
RTO	22	I think that a statement regarding OHS/WHs responsibilities and duty of care is a necessary consideration. While it is important not to discriminate, employers, particularly in the workplace have an obligation to ensure the safety of the employee. The employer cannot put someone on a construction site if their disability would be a breach of OHS/WHs legislation, therefore, this should be the same for an RTO.		Noted
RTO	23	yes, this is helpful	Y	
RTO	24	This is all good information and RTOs should be aware of the access and equity requirements for all training. With respect to this unit, less important for a couple of reasons:		Noted



Stakeholder	#	Industry Responses	Support	TAG Response
		<p>1. as the unit name suggests it is Prepare to work..... so students don't actually physically go onto construction sites so a physical disability would not exclude them from doing this training - whether or not they ever actually work on a construction site.</p> <p>2. It's Cert 1 level - following procedures in a narrow and familiar context, no decision making, no changing procedure, no thinking outside the square - well within most student's capabilities.</p>		
RTO	25	Yes	Y	
RTO	26	Mostly useful. I would suggest to give examples of what is unreasonable (e.g., expanding on not maintaining academic integrity by having someone else complete the task, or by skipping/being overly flexible on how a student completes a task).		
Regulator/Licensing Authority	27	yes	Y	
RTO	28	seems OK	Y	
RTO	29	Page not found The requested page "/disability-standards-education." could not be found.		SSO to check link
RTO	30	This information would be useful for RTO's where trainers are not fully aware of students literacy and numeracy issues.		
RTO	31	Case studies and examples.	Further examples to provided	SSO to review further
RTO/Employer	32	Online e-learning systems should conform to WACG 2.0 <a href="https://www.w3.org/WAI/GL/WCAG20/">https://www.w3.org/WAI/GL/WCAG20/</a>		
RTO	33	The link says page not found, so making the link work would be a good start ! I feel any information that contributes to the support of an individual with any		SSO to check link

Stakeholder	#	Industry Responses	Support	TAG Response
		sought of challenge is valued. It is always fair to suggest that any disability and the adjustments made to assist, must not loose sight of the work related duties and environment the learner is seeking to enter. In this case the "Construction Industry". Trainer assessors are qualified personnel and have completed qualifications to assist them to identify opportunities for "Reasonable" adjustment for students.		
RTO	34	Some examples of how this might be achieved in relation to this particular unit of competency.	Further examples to provided	SSO to review further
RTO	35	Since the assessment in NSW is developed by SafeWork and is mandated it makes the allowance of reasonable adjustment difficult		
RTO/Employer	36	No because the link is outdated and the information cannot be accessed through it.	N	SSO to check link
RTO	37	A clear line of what is an acceptable adjustment is require. Physical and intellectual disabilities differ a lot.	Further examples to provided	Noted
RTO	38	As far as academic integrity goes, this is where providers have come adrift previously. More rigorous auditing in the future will help this. This info was useful.		