

Review of Training and Assessment and the Interface with Licensing within the Queensland Construction Industry

A joint report with Construction Skills Queensland (CSQ)

Conducted between July and December 2018

Report to the Minister for Employment and Small Business and Minister for Training and Skills Development

Key Findings and Recommendations

February 2019

CSQ

**STRONGER FUTURES
IN CONSTRUCTION**

White Card

Key Findings

1. There are varied views of when a White Card is needed within the Queensland construction industry. Over 55,000 individuals complete the competency annually, and 67,000 White Cards are issued annually within a total workforce of 237,000 individuals and 20,000 new entrant apprentices and trainees commencing each year. These figures demonstrate that the intent of the legislative provision is being exceeded but may also indicate over-training and over-licensing.
2. Maintaining the Blue Card creates a level of confusion in the industry in relation to the validity of the card if a person has not performed construction work for two years, and in meeting pre-requisite requirements for asbestos training.
3. Communication and co-operation between ASQA and OIR needs improving, particularly regarding planned audits and approval of RTOs.
4. There are no clear boundaries between the elements of White Card delivery that should be addressed in the training package and the elements that should be addressed by licensing authorities.
5. Communication with industry around the requirement for an individual to undertake construction work in the preceding two years for the White Card or Blue Card to remain valid is not explicit nor clear.
6. Despite previous stakeholder concerns regarding the adequacy of electrical safety awareness delivered by the White Card, the current competency appears to now adequately address this concern.
7. The relevance and value of online training of the White Card continues to be questioned by stakeholders.
8. The White Card replacement process in Queensland appears to be considered an easy avenue for renewal of White Cards across Australia.

Recent changes and activities to address some of the key findings

New conditions of agreement for RTOs to issue general construction induction cards have been implemented by OIR from 1 February 2019. New requirements include:

- A replacement white card can only be issued where the applicant can provide a Statement of Attainment from CPCCOHS1001A – Work Safely in the Construction Industry, or CPCCWHS1001 – Prepare to work safely in the construction industry
- Additional record keeping requirements to assist with compliance audits for on-line training
- Training must occur in Queensland (noting that previously online training was deemed to have occurred in Queensland if hosted by an internet service provider who offered services in Queensland)
- Training must be delivered face to face, with the only exception that online training can be offered where an applicant resides more than 100kms from any OIR approved RTO delivering the competency.

Additionally, stakeholders have provided advice to the Office of the Queensland Training Ombudsman that they are seeking approval to remove the pre-requisite requirement for asbestos training. If this requirement is removed, it will address confusion regarding the equivalence of the Blue Card and the White Card.

Recommendations

Recommendation 1

OIR should provide clear communication to the industry regarding the expiration of a White or Blue Card if construction work has not been performed during the preceding two years, together with clear advice to stakeholders on what action is required to be undertaken by individuals to regain a White Card.

Recommendation 2

Given the significant changes implemented by OIR in February 2019, a follow up review should be conducted in 2020 by the QTO and CSQ, in conjunction with OIR, to determine the impact that those changes have had in addressing the key findings outlined in this report.

Painting and Decorating

Key Findings

1. There appears to be no correlation between the number of defects and the quality of training being delivered.
2. There is a significant difference between the number of individuals completing the qualification and the number of Trade Contractor licences issued.

Recommendations

Recommendation 1

The QTO to continue to work with QBCC to identify why there is a significant difference between the number of individuals completing the qualification and the number of Trade Contractor licences issued.

Plumbing and Drainage

Key Findings

1. The discrepancy between the apprenticeship declaration, requirements of the *Plumbing and Drainage Act*, and QBCC and DNRME licensing requirements is creating confusion.
2. Communication of the link between plumbing apprenticeship and licence requirements with QBCC and DNRME is not clear nor consistent.
3. The review of the qualification being led by Artibus Innovation provides an ideal opportunity to address this link in the longer term.
4. There is an opportunity for QBCC licence processes to adopt best practice models that provide clearer pathways for individuals and enable QBCC to target areas of high risk.
5. RTOs are not providing apprentices with both a Certificate III in Plumbing qualification, and a Statement of Attainment for those competencies delivered above the minimum training package requirements.
6. The implementation of current ERA requirements for apprentice plumbers are not effective in ensuring apprentices are accessing the full range of work or identifying instances where rotation to another employer is required, or where competencies need to be completed in a simulated work environment.
7. Communication regarding acceptable competencies within the Certificate III in Plumbing and the Certificate IV in Plumbing and Services that can be delivered by RPL, or the availability of alternate training pathways, is not clear.

8. The current experience requirements for gas work licences do not reflect the current delivery model for the Certificate III in Plumbing, where a significant number of apprentices are undertaking training for gas competencies in a simulated work environment.
9. Funding provided under the UC program may need to be reviewed by DESBT to ensure it is delivering quality licensed trade outcomes when comparing the number of competencies to be completed in other trade areas.

Recent changes and activities to address some of the key findings

In late 2018, a revised Technical Qualifications for Licensing document was released by DHPW. This document has clarified a number of issues regarding the link between training and licences in the 2016 document. For example, eligibility for sprinkler and suppression system licences now relies on licence endorsements and not the completion of a qualification and/or skill set.

In January 2019, QBCC released “Decision Making Guide – Experience and Qualifications – Plumbing and Drainage licences” for the use of internal staff. This document clarifies that qualifications completed substantially by RPL cannot be accepted and clarifies that the appropriate qualification is the Certificate III in Plumbing.

Whilst these two measures go some way to addressing the findings, inconsistency still exists in relation to industry expectations regarding the additional competencies to be completed above the minimum training package requirements. Industry and union representatives have confirmed that they still believe the “64 competency model” is required to be completed. Given that the QBCC document clarifies the qualification is required for licence eligibility (which is consistent with the legislative requirements), this inconsistency regarding industry expectations is a matter that needs to be resolved between QBCC and industry. Until such time as this inconsistency is addressed, there will continue to be confusion for employers, apprentices and RTOs.

Additionally, the *Plumbing and Drainage Act 2018* was introduced in late 2018, with many provisions relating to licensing not coming into effect until mid-2019. In particular, the new Act indicates that the QBCC Commissioner must decide on the qualifications and practical experience that an individual must have to be granted a licence, and must publish that information on the QBCC website. It is presumed that when this is enacted, the current provisions of the Regulation will need to be amended. This provides an opportunity for QBCC and the industry to provide clear communication to all stakeholders regarding the requirement for a licence.

Recommendations

Recommendation 1

QBCC should continue to work with DESBT and industry to align licence requirements with apprenticeship outcomes and industry expectations, and provide clear advice to all stakeholders regarding licence requirements.

Recommendation 2

The QTO to work with QBCC and CSQ to identify which competencies, if any, within the Certificate III in Plumbing and the Certificate IV in Plumbing and Services, could be recognised for licensing purposes if delivered through an RPL pathway.

Recommendation 3

QBCC should provide clear advice to all stakeholders regarding competencies that will not be accepted for licensing purposes if delivered through an RPL pathway.

Recommendation 4

CSQ should work with DESBT, QBCC and industry stakeholders to identify potential opportunities to provide assistance for experienced individuals in the construction industry to complete qualifications outside of the apprenticeship pathway where applicable.

Recommendation 5

Given recent changes implemented by QBCC, the introduction of the revised “Technical Qualifications for Licensing” document, upcoming legislative changes, and the current training package review, a further review should be conducted by the QTO and CSQ in 2020 to ensure that the key issues identified in this report are being addressed. This follow up review should also consider DESBT ERA requirements and User Choice funding.

High Risk Work Licences

Key Findings

1. The mapping of TVA data to HRW licences issued has identified that in some, but not all, cases there is a close correlation between the number of students undertaking the competency and the number of licences issued. There are a large number of individuals undertaking the training and a large number of licences issued.
2. In most cases, only a very small proportion of enrolments in high risk competencies are funded by the Queensland Government or CSQ.
3. In most cases, the information provided to prospective students is clear, transparent and up to date.
4. All stakeholders indicated a desire for Plant Operator licences to be reinstated.
5. OIR plays an active role in overseeing quality with regard to HRW licences through their accreditation of assessors. However, improved communication and co-ordination with ASQA is required.
6. RTO guidelines or a code of practice, currently being developed by OIR, that reflect the shared nature of achieving quality in the VET sector, and also set out clear expectations from the licensing body/regulator, will assist to address perceived and real issues of concern raised by some stakeholders.

Recommendations

Recommendation 1

Due to what appears to be unexplained discrepancies between competency enrolments and licences issued, the QTO, in conjunction with CSQ and OIR, should undertake further analysis of the following competencies once 2018 TVA data is available:

- Licence to operate a reach stacker (greater than 3 tonnes capacity)
- Licence to operate a slewing mobile crane (up to 20 tonnes)
- Licence to operate a slewing mobile crane (up to 60 tonnes)
- Licence to operate slewing mobile crane (over 100 tonnes)
- Licence to operate a derrick crane
- Licence to operate a portal boom crane
- Licence to operate a non-slewing mobile crane (greater than 3 tonne capacity)
- Licence to operate a tower crane
- Licence to operate a self-erecting tower crane
- Licence to operate forklift truck
- Licence to operate an order picking forklift truck.

- Licence to perform rigging advanced level
- Licence to perform dogging
- Licence to erect, alter and dismantle scaffolding advanced level

Recommendation 2

CSQ and DESBT should use the analysis provided to determine the appropriateness of their investment in each licence competency, and identify areas for future targeted investment.

Recommendation 3

OIR should remove reference to 30765QLD General Course in Demolition, Theory and Application from its website as it ceased to be an accredited course on 30 April 2014 and new licence applicants should be encouraged to undertake the most up to date training available.

Other issues

Legacy licences

Key Finding

There is an opportunity for CSQ and QBCC to work together to identify opportunities to provide subsidised training to individuals to bring them into alignment with current licensing requirements.

Observations regarding licensing

There are many licences and many licensing bodies applicable to work in the construction industry, representing substantial sources of revenue for government agencies. Interestingly, licensing authorities appear to have limited information technology (IT) platforms in place to enable them to easily report on the number of licences held. Individuals are also working with several different agencies in regards to the number of licences that are required. Licensing authorities should consider if there is value in investment in a combined IT platform for licensing in the construction industry.

Currently, experience requirements for Gas Work Licences administered by DNRME vary depending on whether an individual has completed an apprenticeship or not. As many plumbing apprentices are completing their gas work competencies through simulated environments, DNRME should consider reviewing the experience requirements. For example, in NSW, apprentice electricians are required to have their employer complete a statutory declaration outlining that the apprentice has completed at least 12 months supervised work relevant to some critical competencies. This is a model that could be considered by DNRME in lieu of the separate experience requirements for each pathway.