

Review of General Construction Induction (White Card) training delivery in Queensland

Report to the
Minister for Employment and Small Business
Minister for Training and Skills Development and
Minister for Youth Justice
and the
Minister for Education
Minister for Industrial Relations and
Minister for Racing

November 2023

Contents

Executive Summary	1
Introduction	3
Training Package Requirements.....	4
Interstate Comparison.....	5
Details of Current Qld WHS Requirements.....	6
Data Analysis	9
Consultation and Feedback	11
Key Themes and Conclusions	16
Recommendations	20
Attachments	21

Executive Summary

This report provides a review of General Construction Induction Training (GCIT) in Queensland leading to the issuing of a White Card. The White Card is a symbol of completion of GCIT and plays a critical role in contributing to a safe work environment. The overall objective of this review is to assess the current processes and procedures used for GCIT and the issuing of a White Card and to propose recommendations for improvement.

Key findings of the review showed:

- more needs to be done to promote the value and importance of GCIT and the White Card
- Registered Training Organisations (RTO) should train and assess, and Workplace Health and Safety Queensland (WHSQ) should issue the White Card
- there are differences between the unit of competency assessment requirements and the mandated assessment tool that need to be addressed
- GCIT terms and conditions imposed by WHSQ are generally well supported
- the mandated assessment tool is supported but needs to be urgently reviewed
- Connected Real Time Delivery (CRTD) is a supported delivery option that should be retained
- GCIT requirements regarding Personal Protective Equipment (PPE) need to be reviewed
- rural and remote delivery needs further analysis
- increased female participation in GCIT needs to be considered as part of the Women in Construction Strategy
- an annual review process needs to be implemented.

The following recommendations have been made:

1. To reinforce the importance of GCIT, WHSQ should consider implementing a communication strategy across the construction industry that promotes the importance of all forms of induction to enhance worker safety.
2. The issuing of White Cards should be a function of WHSQ and should align to similar processes for high-risk work licences to reinforce the importance of GCIT and ensure the timely issuing of White Cards.
3. WHSQ should consider whether additional components of GCIT, such as hearing tests and an expanded range of PPE, should be included.
4. WHSQ and industry stakeholders should work with the recently formed BuildSkills Australia to ensure the next review of the training competency considers alignment with the mandated assessment tool and the appropriate range of PPE.
5. WHSQ should review the maximum class size requirement of 15 to ensure it is not a barrier to rural regional and remote delivery.
6. WHSQ should review the mandated assessment tool to consider:
 - a. the format and balance of assessment techniques such as multiple choice and short answer questions
 - b. the format and balance of assessment questions ensuring confusion is reduced and questions add to the development and knowledge of appropriate safety behaviours in the workplace
 - c. the appropriateness of assessment questions, ensuring there is endorsement from employer associations and unions
 - d. whether there are alternate strategies for assessment other than having to isolate students.
7. WHSQ should consider options for the provision of the required PPE in rural and remote locations to ensure its provision is not a barrier for vulnerable individuals wishing to get a White Card.

8. WHSQ should work with Aboriginal and Torres Strait Islander Local Government Areas (LGA) to identify why there are discrepancies between people undertaking GCIT and the number of White Cards issued and develop strategies to address identified issues.
9. The Department of Youth Justice, Employment, Small Business and Training (DYJESBT) should consider female access to GCIT and whether more targeted Skilling Queenslanders for Work (SQW) programs are needed as part of the implementation of the Women in Construction Strategy.
10. WHSQ should enter into a formal agreement with DYJESBT to access Total VET Activity (TVA) data to enable an annual review of GCIT delivered and White Cards issued.

The review highlights the importance of preparing individuals to work in the construction industry through the delivery of a vocational education and training competency that leads to the issuing of a White Card. The recommendations in the report should ensure the effectiveness and relevance of the training, strengthen processes and the importance of the White Card, and contribute to enhanced workplace safety in the Queensland construction industry.

Introduction

Purpose and Scope of the Review

Construction sites are inherently risky environments due to the presence of heavy machinery, heights, confined spaces, materials used, electrical work and many other potential hazards. To enhance safety in the industry, there are a range of measures, including:

- regulations and standards
- training and education
- safety inspections
- safety equipment, including PPE
- effective communications
- emergency preparedness
- new and emerging technology.

Induction in the industry is a critical measure to develop awareness of these issues and prepare individuals to work on a construction site. General Construction Induction Training (GCIT) which leads to the issue of a White Card plays an important role in that regard. WHSQ has implemented a number of changes to these arrangements over time and has requested the current arrangements be reviewed by the Queensland Training Ombudsman (QTO).

The Terms of Reference for the Review is at **Attachment 1**.

Background

The National Code of Practice for Induction for Construction Work 2007 identified three types of induction which may be required for the construction industry. Many of the issues identified in this Code are now embedded in standards and regulations. However, the definitions of the three types of inductions are useful for the purposes of this review.

- General Induction to provide persons entering the construction industry with a basic knowledge of requirements under Occupational Health and Safety laws, the common hazards and risks likely to be encountered on construction sites and how these risks should be controlled
- Site Induction to provide information and instruction to anyone engaged on a particular construction site with a knowledge of the contractor's rules and procedures for site safety, emergency management, the supervising and reporting arrangements and other site-specific issues
- Task-Specific Induction to provide information and instruction to anyone undertaking a particular construction activity of the risk factors and control measures relating to that task.

This review is focused only on General Induction leading to the issuing of a White Card (formerly a Blue Card).

History of General Construction Induction Training requirements in Queensland

In 2002, the Queensland Government introduced a requirement for all workers on a construction site to complete a generic induction course. Individuals were required to complete an accredited course - *30215QLD – Course in General Safety Induction (Construction Industry)*. The course was accredited by the former Training Recognition Council and covered:

- appropriate legislative requirements and responsibilities
- basic concepts of workplace health and safety plans and work method statements
- physical building and construction hazards
- basic risk management concepts including hazard identification, assessment of risk, control of risk and evaluation of control measures

- the hierarchy of controls (eliminate, substitute, redesign, isolate, administrate) and use of personal protective equipment.

On completing the course, individuals were issued with a Blue Card. The course required four hours of supervised face-to-face delivery or delivery through distance education.

In 2009, the accredited course was replaced with a national training package competency *CPCCOHS1001A – Work Safely in the Construction Industry*. Individuals who completed this competency were then issued with a nationally recognised White Card.

In 2016, the competency was replaced with *CPCWHS1001 Prepare to Work Safely in the Construction Industry*, which was deemed to be equivalent to CPCCOHS1001A.

In 2022, the competency was replaced with *CPCWHS1001 Prepare to work safely in the Construction Industry*, which was deemed to be equivalent to CPCWHS1001.

As identified in the previous reviews conducted by this Office in 2018 and 2021, WHSQ allowed online delivery of White Card training until 2019. From 1 February 2019, all training had to be delivered face-to-face, with an exception for Queensland residents who lived in a rural area more than 100kms from an RTO approved to deliver the course.

Further changes were implemented from November 2022, including requirements that:

- RTOs have to provide 24 hours' notice before the commencement of a course
- RTOs can be approved to deliver face-to-face training via CRTD
- class sizes were capped at 15
- a minimum duration of 4.5 hours was introduced
- RTOs can only use trainers approved by WHSQ
- mandated assessment implemented from July 2023.

Training Package Requirements

CPCWHS1001 Prepare to work safely in the Construction Industry

The current unit of competency is within the Construction, Plumbing and Services Training Package and is embedded within a large number of qualifications across that training package and others where the attainment of the qualification may lead to work in the construction industry. The other training packages include:

- Gas Industry
- Furnishing
- National Water
- Manufacturing and Engineering
- Transport and Logistics
- Agriculture, Horticulture and Conservation and Land Management
- Defence
- Electrotechnology.

The unit can be completed as part of a qualification or as a standalone unit of competency.

The unit requires the participant to demonstrate personal awareness and knowledge of health and safety legislative requirements in order to work safely and prevent injury or harm to self and others. It covers identifying and orally reporting common construction hazards, understanding basic risk control measures, and identifying procedures for responding to potential incidents and emergencies. It also covers correctly selecting and fitting common PPE used for construction work.

Specific construction hazards identified in the competency include:

- asbestos
- confined spaces
- electrical: power lines, cords and equipment
- excavations and trenches, including underground services
- dust
- falling objects
- hazardous substances and dangerous goods
- hot and cold work environments
- manual handling
- noise
- plant and equipment operation
- traffic and mobile plant
- unplanned collapse
- ultraviolet (UV) radiation
- working at heights, including scaffolding.

The requirements for this competency specify “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”. Additionally, all PPE listed in the performance evidence for this competency must be present and available to learners during assessment activities.

The full unit of competency is at **Attachment 2** and the assessment requirements at **Attachment 3**.

Interstate Comparison

Whilst the requirement for a worker to hold a White Card is similar across jurisdictions, there are differences in terms of when a White Card is required, and the processes required to attain or replace a White Card. All jurisdictions recognise a White Card (or previous induction cards) that has been issued in another state or territory. A summary of some jurisdictional requirements (provided by WHSQ and endorsed by other jurisdictions) is below:

	QLD	NSW	VIC	SA	WA	TAS	NT	ACT
Worksafe Approved RTOs only	Yes	Yes	Yes	Yes	Yes	No	Yes	No
Nominated trainers	Yes	Yes	Yes	No	No	No	No	No
Issuer of White Card	RTO	SafeWork NSW	Worksafe Vic	RTO	RTO	Worksafe Tasmania	NT WorkSafe	Access Canberra
Who applies if White Card not issued by RTO	N/A	RTO	RTO	N/A	N/A	Individual	Individual	Individual
Online Delivery	No (CRTD – separate approval required)	No (RTCD – separate approval required)	No	No	No	Allowed	No	No
Minimum or Recommended Specified Duration	4.5hrs	6hrs	6hrs	6hrs	No	No	No	No
Maximum participants	15	20 Max 10 for RTCD	No	No	No	No	No	No
Notification of scheduled training	24hrs	7 calendar days	No	No	No	No	No	No

	QLD	NSW	VIC	SA	WA	TAS	NT	ACT
Mandated assessment toolkit	Yes	Yes	No	No	No	No	No	No
Replacement Cards	RTO	SafeWork NSW	Worksafe Vic	RTO	RTO	Worksafe Tasmania	NT WorkSafe	Access Canberra
Digital GCIT card option for applicant	No	Yes	No	No	No	No	Yes	No

CRTD = Connected Real Time Delivery

RTCD = Real Time Connected Delivery

Details of Current Qld WHS Requirements

Approved RTOs and Nominated Trainers

An RTO must be approved by the Australian Skills Quality Authority (ASQA) (or other regulator in Western Australia and Victoria) and must have CPCWHS1001 on its approved scope of registration before it can make an application to WHSQ to be approved to deliver White Card training face-to-face. An RTO will not be approved to deliver the training via CRTD without first being approved to deliver the training face-to-face.

The RTO must make application to WHSQ by:

- signing and returning the Conditions of Agreement to issue GCIT cards in Queensland to WHSQ
- nominating trainers for WHSQ to approve
- providing documentation to WHSQ including:
 - policies/procedures relating to how the RTO will manage/issue GCIT cards in accordance with the Conditions
 - evidence the RTO has access to the required PPE for the performance assessment
 - policies relating to document retention
 - policies relating to privacy
 - language, literacy and numeracy (LLN) support services
 - insurance certificates
 - process for the issue of GCIT cards and replacement of GCIT cards
 - evidence of a secure system for the storage of GCIT cards
 - evidence the RTO has a laminator for laminating cards.

An RTO wanting to be authorised to deliver GCIT in Queensland via CRTD must then complete a further two-step application process.

Step One of the approval process involves the RTO providing WHSQ with the following documentation:

- information of the real-time delivery platform to be used, how the platform will be accessed by students and provision of training details (how students will access PPE etc.)
- CRTD training and assessment strategy
- evidence of identity verification process
- strategies for the provision of technical support.

Step Two requires the RTO to facilitate a simulated CRTD session with a WHSQ Inspector to ensure the RTO is complying with WHSQ requirements.

Once this simulation is complete, a recommendation will be made as to whether the RTO should be approved or refused for CRTD.

As at 30 September 2023, there were 215 RTOs approved by WHSQ to deliver White Cards in Queensland. Ten of those were also approved to deliver through CRTD. Details of approved RTOs are available at <https://www.worksafe.qld.gov.au/licensing-and-registrations/work-health-and-safety-licences/what-licence-do-i-need/general-construction-induction>.

A copy of the Conditions of Agreement to issue GCIT cards in Queensland is at **Attachment 4**.

Issuing of White Card and Replacement White Cards

In Queensland, South Australia and Western Australia, the RTO that delivers the training is also responsible for issuing the White Card. In Queensland, approved RTOs order White Cards that are printed as blank templates by an independent third party. RTOs must provide a secure system for the storage of White Cards.

RTOs must only issue a White Card to a person who they believe has successfully completed White Card training in Queensland. Cards issued must be laminated and must include:

- person's full name
- date of birth
- signature
- RTO Number
- issue date.

RTOs must provide a monthly report to WHSQ detailing all card recipients and keep these records for five years.

The RTO may issue a replacement White Card if satisfied the original has been lost, stolen or destroyed. The RTO must:

- verify the person's identity
- obtain a Statement of Attainment from the person verifying the competency has been successfully completed
- obtain a signed written declaration from the person confirming they had previously undertaken the training with an approved RTO, the circumstances in which the card has been lost, stolen or destroyed, and that they have carried out construction work in the preceding two years.

Specified Duration

In 2020, discussions took place between the WHS regulators, Safe Work Australia (SWA) and stakeholders regarding CRTD as an option for the completion of White Card training where classroom training was unable to be accessed because of lockdowns and travel restrictions. The WHS regulators and SWA worked together to develop national parameters to enable RTOs to deliver White Card training via CRTD. These parameters included, among other items, having a minimum training duration of six hours (not including course administration and learner verification activities), and be delivered to no more than 10 learners in any one learning session.

Following subsequent informal consultation between WHSQ and approved RTOs, it was indicated 4.5 hours of training was the average face-to-face White Card training time. WHSQ decided to adopt 4.5 hours as the benchmark for minimum training requirements and mandated this through the Conditions of Agreement to issue GCIT cards in Queensland.

Maximum Number of Participants

Following feedback from RTOs, WHSQ increased the maximum student numbers from 10 to 15 (noting the trainer ratio parameters). WHSQ has at times provided exceptions to the maximum student number in regions where limited White Card training is available (e.g. north of Cairns), as well as implementing a version of the Conditions specifically for schools. The *Conditions of agreement for registered training organisations that are schools to issue general construction induction training cards in Queensland* (Conditions for School RTOs) allows for 20 students to be trained at one time by an RTO that is a school, in consideration of the structured educational setting with highly qualified trainers and being more indicative of regular class sizes. However, it should be noted school training is classroom based.

Notification of Scheduled Training

New South Wales and Queensland both have a requirement that the regulator is to be notified of upcoming course commencements. In Queensland, RTOs must provide 24 hours' notice of:

- date of GCIT
- time of GCIT
- GCIT delivery method (classroom or CRTD for those approved for CRTD)
- the address where face-to-face delivery will be delivered.

If the delivery method is CRTD, the RTO must provide a link or invitation to join the CRTD upon request.

Mandated Assessment (including additional assessment criteria)

Since mid-2023, RTOs in Queensland have been required to use mandated assessment requirements when delivering GCIT. New South Wales is the only other jurisdiction to require use of a mandated assessment toolkit. The Queensland mandated assessment toolkit is comprised of:

- GCIT Assessment Mapping Matrix
- GCIT Assessment Guide
- GCIT Assessment – Assessor Version
- GCIT Assessment – Student Version.

The RTO must ensure the following resources are present and available to students during assessment activities:

- eye protection
- hearing protection
- hard hat
- high visibility vest, shirt or jacket
- copy of the Work Health and Safety Act 2011 (Qld).

The following assessment tasks are required to be successfully completed:

- 50 multiple choice and short answer questions – the assessor must directly supervise students
- 11 oral questions – assessment must be conducted with each student individually, away from other students
- completion of a simple form - the assessor must directly supervise students
- fitting of specified PPE - assessment must be conducted with each student individually, away from other students.

Data Analysis

The regional breakdown of White Cards issued between 1 January 2022 and 31 August 2023 is outlined below:

Statistical Division	White Cards Issued	Percentage
Major Cities	51,062	67%
Inner Regional	14,497	19%
Outer Regional	9,631	13%
Remote	664	1%
Very Remote	644	1%
Total	76,499	

Source: WHSQ

During 2022, only 176 of the 215 WHSQ approved RTOs delivered the competency. Overall, based on TVA data, 284 RTOs delivered the competency during 2022, meaning 108 RTOs that delivered the competency were not approved by WHSQ and were not able to issue a White Card.

Of the 215 WHSQ approved RTOs, 22 are school RTOs and 10 are approved to deliver training through CRTD (as at 30 September 2023).

Training Delivered and White Cards Issued - by LGA

Attachment 5 provides details for all TVA reported delivery of the competency for 2021 and 2022, together with the number of RTOs that delivered to residents of each LGA and the number of White Cards issued in each LGA between 1 January 2022 and 31 August 2023.

In the following LGAs, 653 individual residents undertook the competency yet no White Cards are reported as being issued:

- Aurukun
- Doomadgee
- Etheridge
- Hinchinbrook
- Hope Vale
- Kowanyama
- Lockhart River
- Mapoon
- Mareeba
- McKinlay
- Mornington
- Pompuraaw
- Torres Strait Island
- Weipa
- Wujal Wujal.

It is important to note this has occurred in rural and remote communities, including many Aboriginal and Torres Strait Islander communities.

In the following LGAs, there is a significant discrepancy between the number of individuals undertaking the competency and the number of White Cards issued:

- Bulloo
- Cairns
- Cherbourg

- Lockyer Valley
- Logan
- Longreach
- Napranum
- Tablelands
- Torres
- Woorabinda
- Yarrabah.

Whilst the timelines used for the data do not fully align, this may highlight a need for further investigation. The LGA that requires significant attention is Yarrabah, which has a population of 2,619. In 2021, 41 residents undertook the competency and 74 residents in 2022. However, since 1 January 2022, the data indicates 2,782 residents of Yarrabah have been issued with a White Card – significantly more than the number who undertook the competency, and more than the entire population of that LGA.

The RTOs approved for CRTD delivery as outlined on the WHSQ website as at 30 September 2023 are:

- Advance OH&S Consulting and Training
- City Wide Building and Training Services
- Positive Training Academy
- Link Resources
- Inscope Training
- Express Online Training
- Eclipse Online Education
- Urban E Learning
- Blue Dog Training
- Master Builders Queensland.

Of the 10 RTOs approved for CRTD, only seven reported delivering any training in 2022. Collectively, these RTOs delivered a mix of face-to-face and CRTD training to 24,039 (42% of all delivery) residents of LGAs across Queensland, with the exception of the following LGAs:

- Bulloo
- Burke
- Mapoon
- Napranum
- Pompuraaw
- Woorabinda
- Wujal Wujal
- Yarrabah

Total VET Activity - Government funded vs Fee-for-Service Training – 2022

Age	Government Funded	Fee for Service	Total VET Activity
14 and under	30	658	688
15 to 19	8,271	11,678	19,949
20 to 24	476	7,808	8,284
25 to 29	198	7,021	7,219
30 to 34	125	5,268	5,393
35 to 39	131	3,935	4,066
40 to 44	99	3,158	3,257
45 to 49	58	2,816	2,874
50 to 54	48	2,343	2,391

Age	Government Funded	Fee for Service	Total VET Activity
55 to 59	27	1,609	1,636
60 to 64	23	1,064	1,087
65 and over	11	559	570
Unspecified	13	6	19
TOTAL	9,510 (16.6%)	47,923 (83.4%)	57,433

Source: DYJESBT - Total VET Activity data

Whilst 16.6% of all delivery is government funded, it is important to note 41.5% of the 15 to 19 year old cohort accessed government funded training to undertake GCIT.

Total VET Activity - VET in Schools (VETiS)

Year	Total VET Activity	VETiS
2020	46,351	8,117 (17.5%)
2021	54,186	9,090 (16.8%)
2022	57,433	8,593 (15%)

Source: DYJESBT - Total VET Activity data

Total VET Activity - Female participation

Year	Total VET Activity	Female	VETiS Total	VETiS Female
2020	46,351	7,638 (16.5%)	8,117	854 (10.5%)
2021	54,186	9,692 (17.9%)	9,090	1,026 (11.3%)
2022	57,433	11,069 (19.3%)	8,593	1,063 (12.4%)

Source: DYJESBT - Total VET Activity data

Skilling Queenslanders for Work

A number of SQW projects provide job seekers with an opportunity to complete the competency as part of the qualification they are studying for the relevant program they are undertaking. A number of these programs have targeted female participation. A summary of SQW program participation and outcomes provided by DYJESBT is at **Attachment 6**.

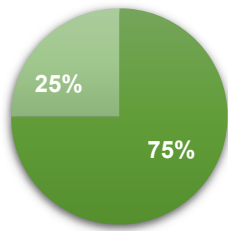
Targeted programs such as those conducted as part of SQW are resulting in 30% female participation (much higher than the average participation rate for the competency) and 60% of individuals who complete the White Card training obtaining employment. Two case studies from DYJESBT are at **Attachment 7** highlighting the outcomes achieved.

Consultation and Feedback

Student Survey

WHSQ facilitated a student survey to inform this review and 1,920 students responded. 55% of respondents were over 25 years of age and 70% of respondents were male and 35% were currently employed in the construction industry. Key responses to the survey included:

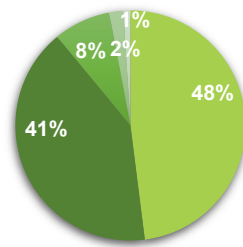
Mode of Delivery



■ "Face to Face" (Classroom)

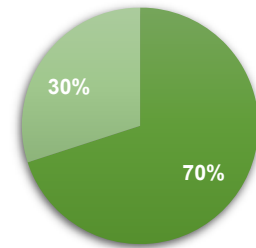
■ "Connected real time" (Zoom or Teams)

How the training was rated



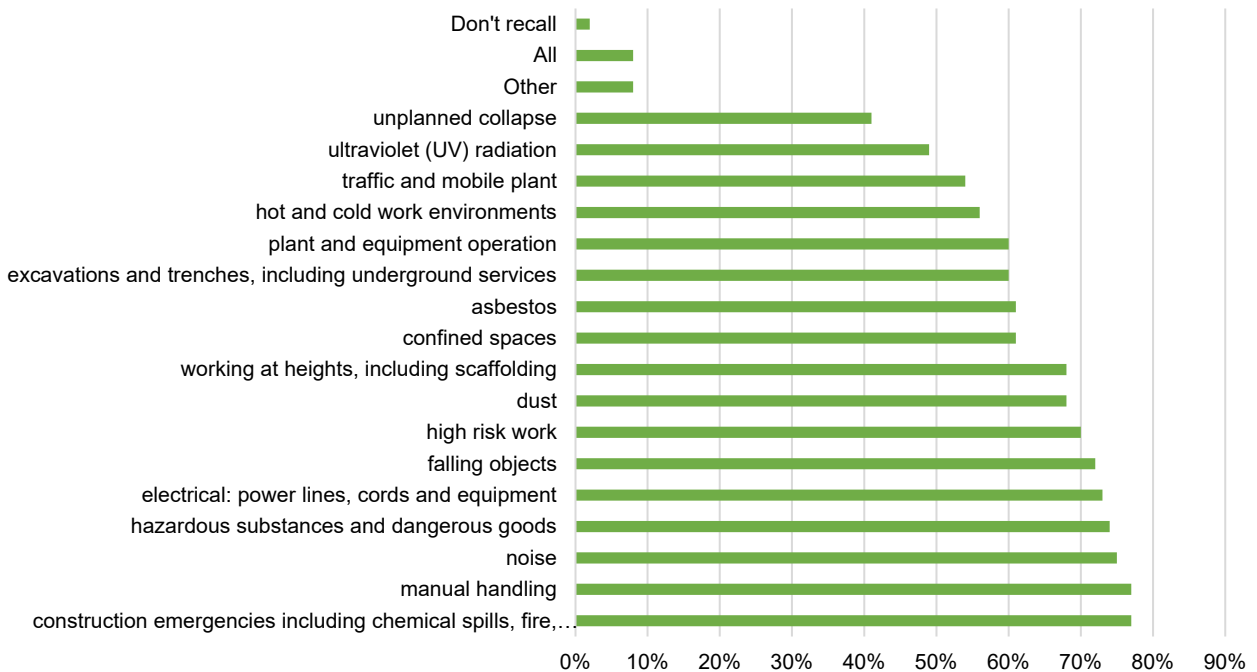
■ Excellent ■ Good ■ Average ■ Poor ■ Very poor

PPE provided by RTO

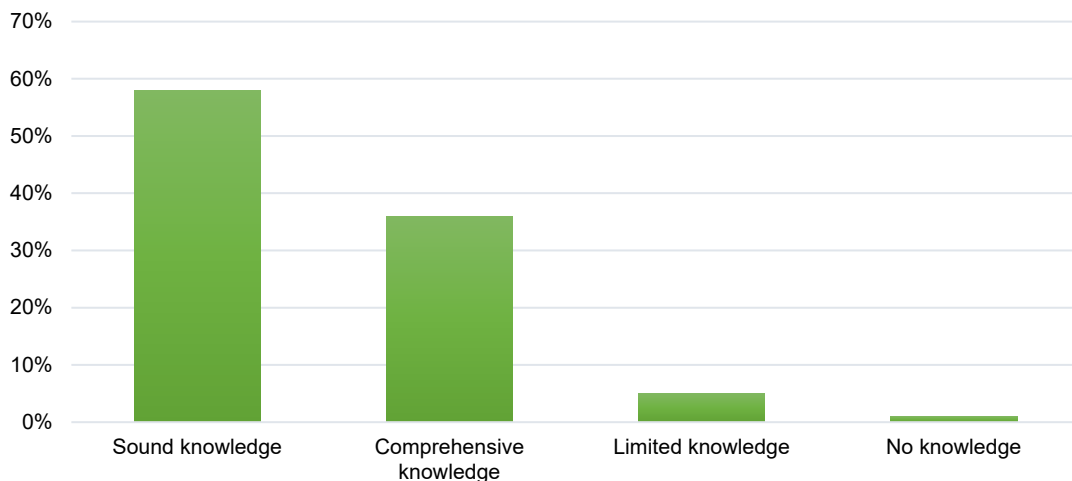


■ Yes ■ No

Hazards Covered in White Card Training



After the training, how would you rate your knowledge of hazard and risks associated with construction work?



Specific comments provided by students who rated the course as poor, very poor or average when responding to the survey included:

- course was rushed
- answers were provided to every question, yet some still got them wrong
- did not require us to put on any PPE
- it is just a box ticking exercise
- poor quality trainers, some with no construction industry experience
- completed the training but never got my White Card (raised by several respondents)
- training was boring and irrelevant
- great revenue generating exercise for RTOs
- White Card has no expiry date (raised by several respondents)
- being able to do the training online and out of hours was very valuable
- being assessed to dress yourself or put on safety glasses is too specific and over the top
- differing needs of learners not considered
- students who could not speak English were 'pushed' through
- told when entering the room that everyone would leave with a White Card
- "All I got from the training was a laminated card".

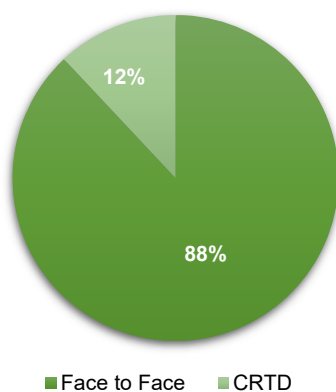
General comments provided by students included:

- a big step up from previous training in 2005
- excellent course with useful information, great training
- beneficial being able to do the course online and I hope that continues
- it helped me gain employment
- had to provide my own PPE (this issue was raised by several respondents)
- had to purchase the required PPE out of my own pocket
- the United Kingdom system requires ongoing training and renewal of the White Card rather than a one-time hit and hope approach
- if the attainment of a White Card is a control measure to mitigate the risk of an injury while on a construction site, it is ineffective
- ridiculous amount of tick the 'incorrect answer' – very confusing
- it is impossible to fail this course
- course is a waste of time (many respondents) and does little more than give bureaucrats and management a paper trail.

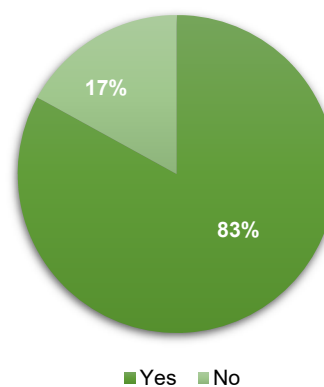
RTO Survey

WHSQ also facilitated a survey of approved RTOs to inform this review and 121 responded. Key responses identified:

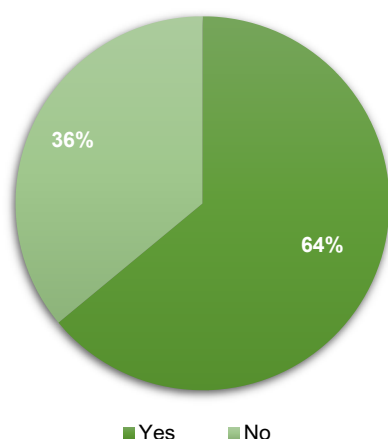
Mode of Delivery



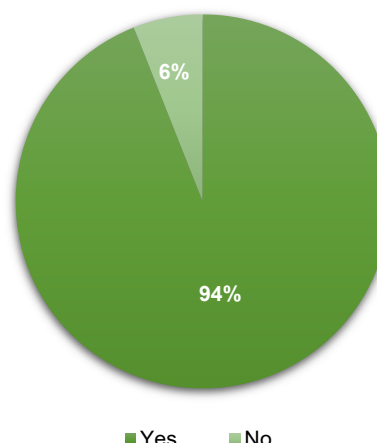
RTO provided PPE



Remote and/or Regional Delivery



Training covers all necessary hazards



General comments provided by RTOs included:

- the mandated assessment requirements create chaos as students are left waiting for 'their turn' as the one-on-one oral and practical assessments are undertaken. It was reported RTOs have recently increased fees charged to students to cater for these new requirements
- 4.5 hours is too long for students who are renewing cards. Six hours is the right amount of training for someone new to the industry
- mandated assessment tool swapping from 'identify the correct answer' to 'identify the incorrect answer' is confusing and in some cases not reinforcing what students should take from the course
- concerns the mandated assessment requirements do not align with RTO Standards and do not recognise the need for fairness in assessment and flexibility based on individual student needs
- the current arrangements for approved assessors, notifications, additional administration and mandated assessment requirements will see many RTOs phase out delivery of this product. One RTO described the assessment tool as a disgrace and indicating they were looking to exit the market, stating the regulator is out of touch and does not know how to consult stakeholders
- current format/model of delivery is the worst model to ever be implemented
- the cards need to be electronic or a better card as the current laminated card does not last
- mandated assessment means there is no difference between face-to-face or CRTD
- students appreciate being able to access the training through CRTD
- the regulator should advertise what the requirements are for a White Card. RTO staff report being abused by students who do not understand the requirements of the mandated assessment
- students access the required PPE when undertaking training through:
 - already having their own PPE or borrow PPE
 - attending the RTO's campus for that part of the assessment or to loan PPE
 - their employer prior to undertaking the training
 - a link to purchase their own PPE at discounted rates.

Stakeholder feedback

A range of stakeholders (**Attachment 8**) were invited to make comment on the issues being covered by this review.

Additionally, three large RTOs were chosen to take part in further consultation – one that delivered entirely face-to-face, one that delivered a mix of face-to-face and CRTD and one that delivered entirely through CRTD.

A summary of feedback received is outlined below:

Purpose and value of General Construction Induction Training

- There is a lot of misinformation and perceptions of what GCIT is
- Need to focus on what is the intent of GCIT ie is it to ensure workers can make the right decision at the right time and ask the right questions
- Students also need to be clearly informed what to expect in terms of site and task inductions and this should be built into the mandated assessment requirements for all RTOs
- Harmonisation across states does not exist beyond a commitment to have a White Card
- One stakeholder suggested learnings from Canada and a local response to increased demand on RTOs should be implemented, meaning the current GCIT should be supplemented with:
 - a one-day safe use of power tools workshop for new entrants
 - a hearing test to establish a hearing benchmark
 - a provocation test to establish a lung capacity benchmark.

Do the training requirements adequately support the safety needs of industry?

- White Card training represents the bare minimum safety requirements for the industry and must be supported with other forms of induction and WHS training
- Too much regulation and focus on generic induction whereas safety for workers can best be improved through more regulation of site induction
- Should be a refresher course at pre-determined intervals eg three years
- Psychosocial hazards and silicosis should be specific inclusions in the competency requirements
- Should be a clear definition of electrical work and where on a site electrical risks may be encountered
- As long as minimum requirements of training package and standards are met, there are no concerns with regulators requiring additional/supplementary knowledge and assessment.

Face-to-Face compared to CRTD delivery

- There is a definite place for online delivery of White Card training if it is controlled correctly, particularly for people in rural and remote locations
- Some organisations do not support any online delivery, whilst others promote access to RTOs delivering through CRTD
- Some organisations were not aware that CRTD was an option.

PPE

- RTOs are ensuring students have access to the required PPE either through the RTO providing access to it, students using or borrowing PPE, attending a campus at a later time, and in some cases, students being provided details of an online supplier to enable them to purchase PPE at a reduced cost
- The current mix of PPE required needs to be expanded
- Concerns were raised that undertaking assessment of an individual correctly fitting a vest/shirt, ear and eye protection and a hard hat was not achieving the desired outcome. Some organisations believed providing students with scenarios and asking them to identify all of the PPE required would demonstrate a better understanding of the importance of PPE
- Concerns that any requirement for students to be provided with the required PPE by the RTO (particularly those undertaking CRTD in rural and remote communities) would result in extra charges to undertake the training.

Mandated Assessment

- Concept is good and ensures consistency irrespective of which RTO or the mode of delivery
- The tools are not working and are creating confusion for students with the way the multiple choice questions are posed and the requirement for one-on-one assessment

- Creating viability issues for some RTOs which may see costs for students increase
- Electrical questions need to be immediately revised with input from unions and employer associations
- New South Wales and Queensland assessment toolkits are very different – New South Wales requiring more short answers compared to the Queensland approach to multiple choice – only Queensland mandates the isolated assessment requirement for oral questions.

24 hours' notice requirement

- Works well for both CRTD and face-to-face delivery with WHSQ inspectors attending sessions or conducting audits
- The seven day requirement in New South Wales can be frustrating compared to the 24 hour notice requirement.

Role of RTOs

- The role of RTOs is to train and assess in accordance with their registration and training package requirements in accordance with national standards
- The role of the regulator should be to issue the White Cards, noting the laminated paper card does not last forever
- Should the current arrangements for RTOs to issue the licence change, all stakeholders identified there KPIs need to be considered to ensure the White Card is issued in a timely manner by WHSQ and applicants have a dedicated line to contact to seek information.

Replacement of White/Blue Card

- If the competency requirements have changed since the individual originally undertook the training, they should be made to undertake the competency and not just have their card replaced
- Should White Cards have an expiry date?

Key Themes and Conclusions

Value of GCIT and the White Card

The White Card serves as evidence an individual has completed the necessary basic training to work safely on construction sites.

In general terms, the advantages of the White Card are:

- enhancing safety
- meeting legal requirements
- providing portable qualifications
- easily accessible.

Alternatively, disadvantages can be:

- cost
- no expiry date
- potential for variations in the quality of training delivery.

The White Card system in Queensland is seen as a crucial safety measure in the construction industry, ensuring workers have a foundational knowledge of hazards and safety procedures. Whilst there may be some associated costs, it is seen as a necessary investment for anyone looking to work in the construction industry.

However, based on feedback received during this review, it is necessary to ensure there is a clear understanding the White Card is only one component contributing to worker safety, noting it is highly regulated and site and task inductions also play a critical role. The regulator may need to consider a communication strategy to reinforce the importance of all components that lead to improved safety in the workplace. At the same time, a campaign should be aimed at all employers/contractors in the industry to remind them of the importance of all types of induction and the importance of ongoing WHS training for themselves and their staff.

Additionally, the feedback also indicated a laminated piece of paper that does not last forever, and can easily be replaced, may not reflect the importance of the White Card as a critical component of worker safety in the industry. As a minimum, the card itself should be updated to the equivalent level of the type of card issued by WHSQ for High-Risk Work Licences.

The Role of RTOs and WHSQ

RTOs deliver and assess nationally recognised training in the VET sector and issue nationally recognised qualifications and statements of attainment. With regards to GCIT, RTOs in Queensland and their assessors must be approved by WHSQ to enable them to deliver training that leads to the issuing of a White Card.

Regulators and licensing bodies normally issue licences which in many cases require the individual to provide evidence of completion of a relevant VET qualification or unit of competency. With regards to White Cards in Queensland, WHSQ authorises approved RTOs to issue the White Card (using an authorised template that must be laminated) to an individual that has successfully completed the required training. This enables the timely issuing of White Cards. RTOs in South Australia and Western Australia also issue the White Cards in their jurisdictions.

There is widespread support for the role of RTOs and WHSQ to be separated in Queensland, to match what occurs in New South Wales, Victoria, Tasmania, Australian Capital Territory and Northern Territory. However, WHSQ would need to commit to ensuring the timely issuing of cards, provide a mechanism for individuals to confirm they have undertaken the necessary training until such time as the White Card is issued, and provide an easily accessible communication channel for individuals seeking an update on when their card will be issued.

In some jurisdictions, RTOs make the licence application to the regulator, whilst in others it is up to the individual.

There may still be a role for RTOs to upload data from the student to enable WHSQ to issue a White Card, unless the individual is given responsibility to make that application as occurs in Tasmania, Northern Territory and Australian Capital Territory. The preference would be to align with Victoria and New South Wales where the RTO makes application on behalf of the student, to ensure a seamless service is provided to students.

If the regulator takes on the role of issuing the White Card, it should enable easier data reporting with regard to the number of White Cards issued and should provide a clear process for individuals seeking to renew or replace their cards.

Linkage between Training Package and Mandated Assessment

Whilst feedback from surveys and stakeholder meetings has identified the competency should include specific silicosis training (the competency currently includes dust as a general term), together with psychosocial hazards and how to manage/mitigate those risks, it is interesting to note the WHSQ mandated assessment tool incorporates questions on these two issues.

As such, the unit of competency requirements and the mandated assessment tool do not align.

Given the mandated assessment tool includes issues above the competency requirements, this would not normally be a concern. However, given more than 100 RTOs that are not approved by WHSQ to deliver the unit of competency actually deliver it in line with their scope of registration, it is important there is consistency between the requirements. Issues could arise where an individual that correctly holds a statement of attainment for the unit of competency has not been assessed in accordance with WHSQ mandated assessment requirements believes they are entitled to be issued with a White Card.

WHSQ Conditions for GCIT

In general terms, there was support for the process of WHSQ approved RTOs and assessors and terms and conditions around the minimum 4.5 hours delivery time and 24 hours' notice. What is evident, as outlined earlier in this report is there is very little harmonisation between jurisdictions regarding these issues.

Feedback in relation to class size and the impact of financial viability need to be considered. WHSQ already allows school RTOs to operate to a maximum of 20. WHSQ may need to consider what the impact of increasing the maximum number to 20 (in line with New South Wales) would have. As a minimum allowing the bigger class size in rural, regional and remote communities may make course delivery viable and promote more face-to-face delivery of the training in those communities.

Mandated Assessment

The introduction of mandated assessment is generally well supported and ensures individuals are able to demonstrate a uniform knowledge of safety issues irrespective of which RTO they undertake the training with, or by which method the training is delivered.

However, the effectiveness of the assessment process depends on the quality of the training provided, the relevance of the assessment questions and processes, together with appropriate measures to maintain the integrity of the assessment process.

Whilst approval processes and terms and conditions deal with the quality of the training provided, there was significant feedback received regarding the relevance of the mandated assessment tool. It is noted that changes to the mandated assessment tool had already been flagged by WHSQ prior to this review. As a minimum, a review of the tool should consider:

- the format and balance of assessment techniques such as multiple choice and short answer questions
- the format and balance of assessment questions ensuring confusion is reduced and questions add to the development of appropriate safety behaviours in the workplace
- the appropriateness of assessment questions, ensuring there is endorsement from employer associations and unions
- whether there are alternate strategies for assessment other than having to isolate students.

The requirement for the regulator to receive 24 hours' notice of delivery, and the need for an RTO to deliver a CRTD session to a WHSQ inspector as part of the approval process, are seen as appropriate measures to ensure the integrity of the mandated assessment process.

Connected Real Time Delivery

The assessment requirements for the unit of competency allow the competency to be delivered through real time delivery. WHSQ has implemented CRTD to ensure approved RTOs were required to meet additional requirements before obtaining approval delivery through that mode.

Feedback through the student surveys identified there were no differences reported by students who undertook delivery through CRTD compared to face-to-face delivery. One of the key strengths of the current system was the flexibility CRTD provides for individuals needing to obtain a White Card.

It is considered the arrangements put in place by WHSQ, particularly the introduction of mandated assessment, ensures the integrity of outcomes delivered through CRTD.

As such, CRTD should continue to be offered as a delivery option for GCIT.

Personal Protective Equipment

The unit of competency assessment requirements indicate the required PPE must be available for use by students undertaking the training. It stops short of stating it must be supplied by the RTO. The WHSQ approval conditions outline similar requirements.

An issue of concern relates to CRTD delivery and whether students (sometimes vulnerable job seekers) are having to outlay extra costs for PPE to undertake the required assessment. Should the student subsequently get a job in the construction industry, the employer is required to provide all relevant PPE.

The issue is not a concern with face-to-face delivery where students have access to the required PPE for assessment purposes, if needed. Students undertaking the training through CRTD have several options for the provision of PPE as outlined earlier in the report. Mandating that the RTO must provide PPE to students would simply see the cost of attaining a White Card increase by the cost of the PPE. Alternative options are needed to be considered particularly in rural and remote areas. One suggested option is whether a pack of the required PPE could be made available through council library facilities in those areas.

Significant feedback was also received regarding the suite of required PPE being too narrow (eg does not include masks or boots) and whether the individual assessment is still required. Concerns were raised that individuals have been assessed on how to put on a shirt. Longer term consideration may need to be given from replacing the current requirement with scenarios where an individual must identify all required PPE relevant to the workplace.

Rural and Remote Delivery

Data presented in this report and at **Attachment 5** confirms GCIT is being delivered to, and White Cards issued, across almost all LGAs. A number of LGAs have been identified where there are significant discrepancies between the number of individuals undertaking training and the number of White Cards issued.

It is concerning many of the areas identified are Aboriginal and Torres Strait Islander communities. Further analysis needs to be undertaken to understand why these discrepancies exist, whether the number of White Cards issued reflects the level of construction activity in those communities and whether targeted programs should be considered in these communities to address the identified discrepancies.

Female Participation

The *Review of support provided to Queensland Apprentices and Trainees, with a focus on female apprentices in male dominated occupations* report prepared by the QTO recommended Construction Skills Queensland develop a Women in Construction Strategy. It is understood this strategy is currently being considered by the Queensland Government.

The review of GCIT provided a further opportunity to identify barriers for females wanting to enter male dominated occupations and industries such as construction, particularly given that accessing a White Card is a pre-requisite to working in the industry. Data outlined earlier in this report identified that of the 8,593 students who undertook the competency through VETiS, only 12.4% were female. However, targeted programs such as those offered through SQW result in 30% female participation and 60% of individuals who complete the White Card training obtain employment.

Consideration should be given during the implementation of the Women in Construction Strategy to identifying barriers to females undertaking the GCIT and recognise the benefits of targeted programs such as those offered through SQW.

Annual review of activity

An analysis of training delivery linked to the issuing of White Cards should be undertaken on an annual basis by WHSQ to identify areas and RTOs of concern. To enable this, WHSQ should work with DYJESBT to develop an Information Sharing Agreement to allow WHSQ to undertake annual analysis of data by LGA as used in this report.

Recommendations

1. To reinforce the importance of GCIT, WHSQ should consider implementing a communication strategy across the construction industry that promotes the importance of all forms of induction to enhance worker safety.
2. The issuing of White Cards should be a function of WHSQ and should align to similar processes for high-risk work licences to reinforce the importance of GCIT and ensure the timely issuing of White Cards.
3. WHSQ should consider whether additional components of GCIT, such as hearing tests and an expanded range of PPE, should be included.
4. WHSQ and industry stakeholders should work with the recently formed BuildSkills Australia to ensure the next review of the training competency considers alignment with the mandated assessment tool and the appropriate range of PPE.
5. WHSQ should review the maximum class size requirement of 15 to ensure it is not a barrier to rural regional and remote delivery.
6. WHSQ should review the mandated assessment tool to consider:
 - a. the format and balance of assessment techniques such as multiple choice and short answer questions
 - b. the format and balance of assessment questions ensuring confusion is reduced and questions add to the development and knowledge of appropriate safety behaviours in the workplace
 - c. the appropriateness of assessment questions, ensuring there is endorsement from employer associations and unions
 - d. whether there are alternate strategies for assessment other than having to isolate students.
7. WHSQ should consider options for the provision of the required PPE in rural and remote locations to ensure its provision is not a barrier for vulnerable individuals wishing to get a White Card.
8. WHSQ should work with Aboriginal and Torres Strait Islander LGAs to identify why there are discrepancies between people undertaking GCIT and the number of White Cards issued and develop strategies to address identified issues.
9. DYJESBT should consider female access to GCIT and whether more targeted SQW programs are needed as part of the implementation of the Women in Construction Strategy.
10. WHSQ should enter into a formal agreement with DYJESBT to access TVA data to enable an annual review of GCIT delivered and White Cards issued.

Attachments

- Attachment 1** Terms of Reference
- Attachment 2** CPCWHS1001 Prepare to work safely in the Construction Industry
- Attachment 3** Assessment Requirements
- Attachment 4** Conditions of Agreement to issue GCIT cards
- Attachment 5** Data Analysis by LGA
- Attachment 6** Skilling Queenslanders for Work Construction and Women Projects
- Attachment 7** Skilling Queenslanders for Work Good News Stories
- Attachment 8** Stakeholder Consultation