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Dear Sir/Madam

CMPA submission
“Review of Training Packages and Accredited Courses – Discussion Paper”

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, soil, and gypsum. CMPA members also operate construction material recycling businesses. CMPA members are typically small to medium sized family businesses, local government and utilities. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The construction material industry underpins growth and development in Victoria through supply of the construction materials described above (58 million tons in 2011/12, approximately \$833 million). CMPA members account for approximately half of this production.

Training is an issue for the extractive industry in that it is a relatively small industry with low numbers of employees, located mostly in outer metropolitan areas and a mature aged work force. Furthermore, the low number of employees per site make it difficult for the employer to send workers on training without closing the site down.

On 12 February 2013 the CMPA hosted an extractive industry employers and educational providers’ forum to evaluate the way forward with respect to the industry accessing a training and assessment service that will add value to construction material businesses.

The key points from that forum were:

1. The training system and funding arrangements are a language all of its own and combine to present a formidable barrier for employers and employees seeking to engage with the training system.
2. Vocational training, assessment and qualifications arrangements must be based on typical jobs found throughout the industry.
3. Only a properly targeted training and assessment system will add value for industry in terms of upskilling to meet increasingly complex safety and compliance requirements.
4. Industry qualifications must reflect typical industry job profiles in order for upskilling initiatives to underpin systems/job redesign and associated productivity improvements.

5. Employer engagement with the training system is an investment where the potential pay-off is in terms of enhanced compliance, safety, productivity and staff morale.
6. The Certificate III (Resource Industry and Infrastructure) was seen as a typical example of an industry qualification that had only tenuous links to real quarry related jobs.
7. Existing and previous funding arrangements have skewed training towards Certificate III level training, at the expense of well targeted Certificate II level training, which has undermined the compliance, safety, staff morale and productivity improvements that might otherwise have been achieved.
8. The CMPA is committed to assisting the Government to develop an action plan that addresses the issues raised above and a road map towards implementing a training system that can add value for extractive businesses, and at the same time represents a much better investment for both Federal and State Governments in our future workforce.

Comments on the “Review of Training Packages and Accredited Courses – Discussion Paper - Introduction

P.7 4th paragraph *“A strong focus must be placed on providing skills that most closely match job requirements, build workforce capacity, increase productivity...”*

Additionally, a strong focus should be placed on meeting regulatory compliance and competency requirements.

“Increasingly workers will need to have transportable skills that move between employers, industries and occupations in response to changes in the job market.”

Whilst it is understood that workers need transportable skills, it is not in the interest of an employer to train an employee for their next job with another employer in a different industry.

P.8 4th paragraph *“The VET system is based on the provision of nationally recognised training, a corner stone of which is nationally consistent qualifications and statements of attainment, national regulation of providers...”*

Currently, this is not the case, with rogue RTOs chasing the government funding and delivering courses that are not up to standards of more reputable RTOs leading to inconsistent quality of national qualifications. There should be more emphasis on value for money, and participant and employer satisfaction.

p.8 5th paragraph *“They (National Training Packages) also describe how these competencies can be packaged into nationally recognised qualifications that are aligned to the Australian Qualifications Framework.”*

The competencies need to be developed from real job profiles and should lead to nationally recognised qualifications. Employers should be encouraged to provide job description to RTOs.

p.9 5th paragraph *“...that the national system of qualifications must provide a reliable signal to employers about the skills an individual has...”*

Employers actually require demonstrable competency and productivity improvements.

p.9 A) *“How well is the system meeting the needs of industry, employers and individual students?”*

There is currently too much focus on generic skills. It is also very important that there is a consistent assessment of competency across Australia.

p.10 B) *“Do all the competencies, skills and qualifications currently included in the national system need the same level of prescription and oversight?”*

The level of prescription and oversight of competencies, skills and qualifications included in the national system should be dependent on the level of risk attached to the job profile. For example, the level of risk associated with operating a haul truck in the quarry industry from a safety and capital perspective would be much greater than for office administration.

p.10 C) *“Are qualifications flexible enough to meet employer needs, given that they are developed against a national standard?”*

The qualifications are not flexible enough from the perspective that training needs to be developed from real job profiles and this needs to be reflected in the qualification that is attained. Too much emphasis has been placed on providing support material to RTOs.

P.11 D) *“Is the focus on training outcomes strong enough in the training system?”*

There is not enough focus on training outcomes in that, under the current system, a qualification can be obtained in Certificate II/III surface extraction operations but the candidate would not necessarily be deemed competent by the employer in operating mobile plant on successful completion of the course. The focus should be more on assuring that the assessment demonstrates competencies and performance that meet the industry and employer requirements. This should translate into industry having a stronger role in the quality assurance of student assessment for training developed from real job profiles. The employer and the employee should have input into the final approval: if they are not satisfied then the employee has not successfully completed the training.

The proposal that the delivery of transferable skills can assist employers to have a flexible workforce that can respond to change is not necessarily the case if all the workforce has the same set of generic skills and no specialist skills.

With respect to consideration of changing the system; decisions should be based on data that support existing successes or failures. The following comments are made by CMPA concerning the three levers that are considered by the Discussion Paper for improving the current system:

1. Changing the mix of skills included in training packages and qualifications.

- Currently, the training package qualifications for the construction material industry are not structured to provide the skills relevant to the specific occupation such as “conduct haul truck operator”.
- The construction material industry is calling for workers who are competent, compliant and productive in the jobs they currently have.

- The focus of the training system should be changed to better meet the needs of employers through development of training from real job profiles that leads to competency and improved productivity of the employee.
- As a general rule, an employer would not be training their employee in skills that were relevant only to other industries.
- Whilst there appears to be common units that deliver skills which can be applied across a broad range of jobs, they are actually industry dependent.
- Broad banding qualifications into vocational streams would see the workforce with generic skills as opposed to having the technical skills that is required by the construction material industry.
- It is of concern that there are low level of completion rates in Certificate I and II and consideration should be given to the fact that there are some elements of the workforce that struggle with training and education in general. It may be more appropriate for the generic skills to be taught to secondary school students so that they are more workforce ready.
- As stated previously, what is required is the development of training funded by Government from real job profiles that provides an increase in productivity, satisfies competency requirements and leads to a nationally recognised qualification.

2. Change the system architecture

- There are benefits to prescribing additional delivery and assessment requirements where there is an identified risk such as in the construction material industry.
- Other delivery measures that could be incorporated into training packages could be a range of training conditions and mode of delivery.
- For job portability then national consistency is required in the extractive industry.
- In order for the system to provide a lighter touch for some nationally recognised training and a higher level of regulation for others there needs to be differentiation based on the risk profile of the industry/job.
- There needs to be the flexibility to developing training from the real job profile and package the relevant units to meet employer requirements for competency and improved productivity.

3. Change the focus of the system

- CMPA is concerned about training courses being delivered inappropriately (i.e. no practical training in real situations) and assessed within very short timeframes. Also, there are examples of poor assessment including “tick and flick” practices. This leads to inconsistent standards of competency that may endanger the health and safety of the student. A qualification or statement of attainment must be a guarantee that an individual is competent in their job.
- It needs to be determined whether the training is for assessing those that have been in the industry for many years; preparing future employees to work in the industry or protecting employers by having the employee assessed as competent.
- The proposal that final sign off for a qualification should be undertaken by an independent national body rather than the training provider or employer has some merit, however, there are concerns that:
 - There will be significant cost borne by government and industry to implement and maintain.
 - There may be challenges in obtaining national agreement on the outcomes.
- There should be increased transparency of training provider assessment including outcomes/performance which would assist the industry in making informed choices on training providers.
- An increased focus on improving the assessment of nationally recognised training has some merit but will not address the primary issue that training needs to be developed from real job profiles in order to meet industry needs.
- For external assessment, issues such as “conflict of interest” and the assessor focussing only on the need to generate a revenue stream also need to be addressed.
- The fit of training within the company structure should be explored, for example, whether it is ad hoc or systematic.

Conclusion

Currently, the training packages are not meeting the needs of the construction material industry in Victoria. A stronger focus needs to be on providing training developed from real job profiles that leads to an increase in productivity and satisfies competency requirements. Additionally this training (developed from real job profiles) needs to be a nationally recognised qualification and have access to government funding irrespective of previous training.

The CMPA is committed to assisting the Government to develop training package development and maintenance requirements that are industry driven, bereft of red-tape, timely and nimble enough to keep the industry’s skilling needs up to date, and futures oriented.

Please contact me if you would like to discuss this further.

Yours Sincerely

A handwritten signature in black ink that reads "EM Gibson". The letters are cursive and somewhat stylized.

Dr Elizabeth Gibson
General Manager