Australian Government Department of Employment



Department of Employme and Workplace Relations

# **Training Product Submission**

This form facilitates <u>Section 7: Step 5.1 Submission of draft training products to the Assurance Body</u> in the Training Package Products Development and Endorsement Process Policy (TPPDEPP).

Completing this form and submitting the required information, including in the attachments, provides the Assurance Body with the necessary information to assess your Training Product Submission (the submission) against the standards and policies set out in the Training Package Organising Framework (TPOF). This is an opportunity to describe how the processes you have applied to develop your products and the products themselves comply with the requirements of the TPOF.

Components of the submission include:

- this form
- completed attachments including:
  - o the draft training package products (products)
  - o the Companion Volume Implementation Guide/s

# About this form

There are nine sections to this submission form:

Section 1 — Jobs and Skills Council Details
Section 2 — Submission Details
Section 3 — Planning Documents
Section 4 — Overview of the Technical Committee
Section 5 — Consultation Strategy & Activity
Section 6 — Dispute Resolution
Section 7 — Mandatory Workplace Requirements
Section 8 — Compliance with Requirements
Section 9 — CEO Declaration

Unless otherwise indicated, you must provide a response to each question and to each part of each question.



This symbol has been used throughout this form to indicate where attachments and additional information **must** be attached to the submission.

# Submission to the department

This form and the required attachments must be uploaded to the relevant activity folder in the TPA GovTEAMS Community. Once all documents have been uploaded and your submission is complete, email <u>TrainingPackageAssurance@dewr.gov.au</u> with the Activity ID and Title to advise the submission is ready for assurance.

Incomplete submissions, including where there is insufficient/missing detail in the submission form and/or attachments, will be returned to you and the assurance process will be paused until the required information is received.

A checklist is provided at the end of this document to ensure your submission is complete.

# Assistance completing this form

If you need help completing this form, please contact <u>TrainingPackageAssurance@dewr.gov.au</u>.

Please refer to the department's website and the TPA Community in GovTEAMS for further information about the Training Package Assurance process.

# Section 1 – Jobs and Skills Council Details

# 1.1 Jobs and Skills Council Details

#### Jobs and Skills Council Name:

Skills Insight

# Contact person:<br/>(the officer the Training Package Assurance team will liaise with during the assessment process)Name:Danni McDonaldPosition:Training Standards and PPhone:03 9321 3511Mobile:Email:danni@skillsinsight.com.au

# Section 2 – Submission details

# 2.1 Activity

Activity ID:	AFP_ANN_2223_003
Activity Title:	Tree Felling Safety

# 2.2 Scope of submission

List the number of Qualifications, Units of Competency, and Skills Sets included in this submission:

Qualification(s):	3
Unit(s) of competency:	3
Skill Set(s):	0

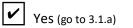
Complete and attach Attachment A – Products submitted for assurance

Attach a copy of all products submitted for assurance including the Companion Volume Implementation Guide

# Section 3 – Planning Documents

# 3.1 The Annual Training Product Development Plan

Is this activity included in the published Annual Training Product Development Plan as required at Section 6 of the TPPDEPP?



NO (go to 3.1.b)

#### **3.1.a** Provide a link to the published plan.

Link/URL: https://skillsinsight.com.au/wordpress/wp-content/uploads/2023/12/PLN.Annual.Training.Product.Developr

**3.1.b** Describe why the activity is not included in the published Annual Training Product Development Plan.

# Section 4 – Technical Committee

### 4.1 Technical committee details

Attach details of the membership of the technical committee and their expertise as per Section 7, Step 1.2 of the TPPDEPP including the Terms of Reference for the committee.

If the composition of the technical committee has changed from that published at the pre-submission stage, include a justification for the change describing the impact of the change on the development activity.

### 4.2 Technical Committee Review

Attach a statement that the technical committee has reviewed the draft training products

# Section 5 – Consultation Strategy & Activity

5.1 Stakeholder consultation strategy

Attach a copy of the stakeholder consultation strategy

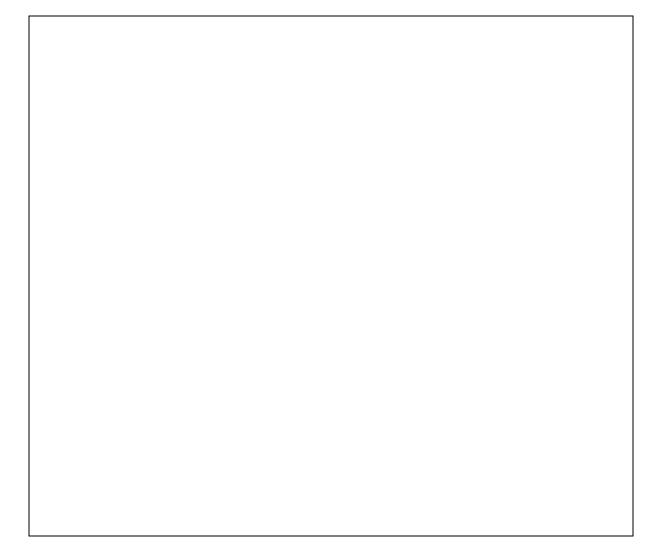
Did the consultation undertaken deviate from the stakeholder consultation strategy (including changes to identified stakeholders, and any delays or changes to consultation timeframes)?



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**X** No (go to 5.2)

Provide a summary of the changes and describe why the consultation strategy changed including any impacts of those changes.



# 5.2 Vulnerable and Minority Cohorts

Describe how consultation has been responsive to the needs of vulnerable or minority cohorts, including women, people with disability, culturally and linguistically diverse communities, and First Nations people.

This was a fast-track project with a specific focus on addressing the challenge of training delivery for RTOs. The challenge pertained to the increasingly restricted access to trees for training and assessment, due to environmental and heritage protection regulations and policies. The consultations aimed to find solutions to reduce the number of trees required to demonstrate competency in manual tree felling at basic, intermediate, and advanced levels, while ensuring that safety and competency remained paramount.

The scope of this project in the approved Activity Submission (included with this TPAB submission for reference) did not identify issues associated with vulnerable and minority cohorts, nor did it anticipate that any in these groups could be impacted by the project outcomes. Consequently, the consultation strategy did not identify any additional specific consultation activities (beyond those that are standard practice in all Skills Insight projects) that would seek specific feedback from vulnerable and minority cohorts, nor did it ensure representation of these groups as key stakeholders in the consultations.

However, during the final round of consultations, an RTO highlighted that the reduction in the number of trees used for training and assessment is particularly important when delivering these units to First Nations people on their country, as the needless destruction of trees is culturally inappropriate. We must always be mindful of this. These environmental and cultural concerns from First Nations communities regarding tree use as part of tree felling training were noted and acknowledged in this project, highlighting the importance of engaging with First Nations peoples as key stakeholders in any future projects in this area.

This feedback enhanced our understanding of the factors that, alongside environmental and cultural heritage legislation and policies. limit tree availability for some trainers. However, the

# 5.3 Consultation Log

Attach a consultation log that includes:

- stakeholder feedback from public and government consultation, supplementary consultation (if required), and the senior officials' check
  - include a summary of all feedback received incorporating details about the number and categories of stakeholders, key issues and any action taken to address the issue, indication of support of the product as well as further detail on individual pieces of feedback
- evidence that RTOs, Commonwealth and state and territory representatives and educational experts have been consulted and responses received
  - Where evidence from one or more is not received, provide a rationale
- where the proposed product has cross-sector units, evidence that relevant JSCs have been consulted
- outcomes from any dispute resolution process
- what changes were made in response to any feedback received
- where feedback has not been incorporated, evidence detailing why

Where there is missing evidence or the consultation log does not include the required evidence, provide details including a rationale.

The Consultation Log provides a comprehensive summary of all feedback received, including detailed contributions from individual stakeholders. Additionally, it encompasses feedback from the Technical Committee.

Registered Training Organisations (RTOs) and educational experts operating within or across specific industry sectors related to manual tree felling operations, alongside unions and industry body representatives, were informed about this project. Their input was solicited during the two phases of consultation - Broad Consultation and Validation. This feedback was thoroughly recorded and addressed.

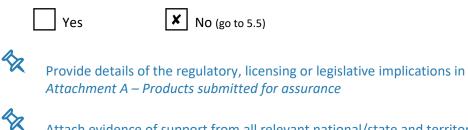
Furthermore, the Public Skills Australia Jobs and Skills Council participated in the review and consultation processes for the FWP units focusing on manual tree felling as part of this project. These units were revised and updated with feedback from the Work Health and Safety (WHS) regulatory authority in Victoria, through a WorkSafe Inspector participating as member of the Technical Committee.



Attach the consultation log (example consultation log provided at *Attachment B*)

# 5.4 Engagement of Regulatory and Licensing Bodies

Do any of the products in the submission have regulatory, licensing, or legislative implications?



Attach evidence of support from all relevant national/state and territory regulatory and/or licensing bodies

# 5.5 Engagement with other Jobs and Skills Councils

Do any of the products in this submission impact other Jobs and Skills Councils products?

🖌 Yes

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NO (go to 5.6)

List the Jobs and Skills Council(s) impacted:

Public Skills Australia Jobs and Skills Council

Attach evidence of support from all relevant Jobs and Skills Councils

# 5.6 Evidence of broad consensus

Has broad consensus been reached on all products?



#### Attach evidence of support

**5.6.a** Provide a summary of how broad consensus has been determined.

Project communication was facilitated through a variety of channels and tools, including the Skills Insight website, newsletters, project update emails, workshops, meetings, and surveys. Technical Committee Experts played a crucial role by discussing the issues related to training delivery, suggesting potential solutions, reviewing feedback from extensive consultations, and reaching consensus on modifications to the units. They identified key factors that influenced the proposed changes to the units and formulated justifications for these agreed-upon changes. This information served as a basis for informing comprehensive consultations at two stages: the initial 'broad consultation' phase from 17 October to 14 November 2023, and subsequently, the 'validation' phase from 4 December to 17 December 2023.

Stakeholders were encouraged to provide feedback. Every piece of feedback received was thoroughly considered, addressed and presented in both the summary of feedback documents and through direct communication with individual stakeholders. During the broad consultation phase, 73 pieces of stakeholder feedback were gathered, with an additional 39 pieces collected during the validation stage.

Recognising that training delivery challenges associated with access to tree resources

**5.6.b** Where broad consensus is not reached, provide a justification for why the product has been submitted for endorsement.

### Section 6 – Dispute Resolution

Note: This section refers to disputes as described in the Model Dispute Resolution Policy at Appendix C of the TPPDEPP

#### 6.1 Disputes

Were there any disputes about the content of the products during stakeholder consultations?



**X** No (go to 7.1)

Describe the dispute/s and how you applied your internal dispute resolution process.



Provide detail about the dispute/s including the stakeholders involved in the consultation log (See example Attachment B Consultation Log - Dispute Resolution tab)

# 6.2 Alternative Dispute Resolution (ADR)

Was an Alternative Dispute Resolution (ADR) practitioner engaged?



**X** No (go to 7.1)

Provide an outline of any disputes that were escalated to ADR. Provide recommendations produced as well as the final position of the Jobs and Skills Council, including a justification where the ADR practitioner's recommendations were not adopted.



Attach a copy of the ADR practitioner's advice

# Section 7 – Mandatory Workplace Requirements

# 7.1 Rationale for mandatory workplace requirements

Are there Mandatory Workplace Requirements (MWRs) included in the submitted products?



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Yes

**X** NO (go to 8.1)

Include details of the MWRs in Attachment A – Products submitted for assurance

Describe the process undertaken to determine the MWR. The information in this section should include:

- the methods used to consult with stakeholders about MWR
- negotiations about the structure of the requirements
- impact on training and assessment delivery
- rationale for inclusion this must include the industry reasons for wanting MWR and why it is not possible to simulate a workplace environment

Consider the process set out in the good practice guide on MWR: <u>On the Mark: 5 Good Practice</u> <u>Principles</u> when completing this section.

# 7.2 Support for mandatory workplace requirements

Attach evidence of support for proposed requirements (including from small to medium sized enterprises), and employer willingness to support learner work placements

# Section 8 – Compliance with Requirements

#### 8.1 Anti-Discrimination Assessment

Provide an assessment that demonstrates that the products meet anti-discrimination legislation, and associated standards and regulations, including the <u>Disability Standards for Education 2005</u>.

Refer to the *Training Product Assurance Submission Compliance Guide* for information.



### 8.2 Pathways

Provide evidence that pathways from entry and preparatory level facilitate movement between schools and VET, from entry level into work, and between VET and higher education qualifications where applicable. Evidence may include (but is not limited to):

- confirmation from States and Territories in relation to VET in schools
- correspondence with universities about pathways acknowledgement
- notes from discussions with technical committee
- mapping documentation



Attach supporting evidence

### 8.3 Existing Units

Describe the process undertaken to rationalise and streamline the products. This may include units to be deleted and the use of cross sector units and/or other existing units.

This project did not undertake a comprehensive review of the three tree felling units. Furthermore, no qualifications were reviewed during this project, which could have facilitated the identification of redundant units. Three qualifications received minor updates to incorporate the updated unit codes that resulted from this project. No new units were created as part of this project.

The project was a fast-tracked project with a specific focus on addressing concerns around competency and access to trees for assessment, specifically, to review the volume of trees required for assessment. This review was initiated in response to feedback from both industry stakeholders and training providers, which highlighted the need to revisit these specific units despite having undergone amendments in 2022 as part of the broader Responding and Assisting in Bushfires. The amendments at that time were subsequently considered unsuitable with ongoing safety concerns preventing the full support of industry to the changes made at that

#### 8.4 Pre-requisites

Does the submission include any products that contain pre-requisites?

Yes

**X** No (go to 8.5)

Describe the process undertaken to minimise pre-requisites.

Were there any issues raised about pre-requisites through the consultation process?



NO (go to 8.5)

Provide a summary of the issues raised and how the issue has been resolved.

Whilst the project's scope was to review the volume of trees for assessment in Performance Evidence of three units of competency, considerable stakeholder feedback focused on the need to incorporate pre-requisite units into tree felling units.

Stakeholders, including experts from the Technical Committee, have emphasised the critical importance of pre-requisite units as a fundamental safety measure because tree felling is considered a high-risk operation. The underlying rationale is to ensure that learners enter training programs with the necessary underpinning skills and knowledge, thus supporting a safer training and assessment process.

Currently, the units of competency and the Companion Volume User Guide: Fell Trees Manually allows for an RTOs discretion in determining the suitability of learners for training. The absence of pre-requisites has been identified as a gap that may compromise learner safety, prompting significant feedback on the critical need for pre-requisite units - an issue that fell outside the scope of this project.

However, the project investigated the possibility of integrating pre-requisites into the units.

# 8.5 Implementation Issues

Were there any implementation issues raised through the consultation process?



NO (go to 8.6)

Provide a summary of the implementation issues raised and the proposed management strategy. For example:

- how the downstream impacts of the changes will be managed (for example, where the submission proposes deletion of units/qualifications)
- implications for other products in the training system

This project has reviewed and, where applicable, updated three tree felling units to improve their deliverability, while supporting safety and competency. The delivery challenge identified was the number of trees required to be felled in order to demonstrate competence at a basic, intermediate and advanced level.

The updates to the units include several key changes, including a reduction in the number of trees required for assessment to 3 for the basic level and 4 for the intermediate skill level, with no change for the advanced unit remaining at 6. This is in comparison to the units' version before the 2023 release, whereby the changes implemented were considered inadequate when forestry industry stakeholders considering competency and safety.

Additional updates to the units include:

Improved criteria for risk assessment across all skill levels to strengthen safety measures.
New Performance Evidence criteria in FWPCOT2275 Fell Trees Manually (Basic) for using the wedge technique, aimed at supporting competence in directional felling of trees.
New Performance Evidence criteria in FWPCOT3350 Fell Trees Manually (Intermediate) for selecting tree types based on varying diameters in relation to the length of the chainsaw bar and the lean of the tree to ensure competency in handling diverse tree types.
New Performance Evidence criteria in FWPCOT3351 Fell Trees Manually (Advanced) for selecting different types of advanced trees, ensuring a broad spectrum of competency across different types of trees.

### 8.6 Request to change transition period

Do any of the submitted products require a change to the standard transition period (12 months)?



**X** No (go to 9.1)

Include details of the requested transition period and rationale in *Attachment A – Products submitted for assurance* 

#### Section 9 – CEO Declaration

#### 9.1 Submission declaration



The proposed products were developed in accordance with all components of the Training Package Organising Framework.



I confirm all required attachments are included with this submission.

Jobs and Skills Council Chief Executive Officer							
Signature:	Affler	Date:	23/02/2023				
Full Name:	Michael Hartman						

# 9.2 Summary of assurance process

Include a summary indicating how the CEO was assured that the submission meets the requirements set out in the TPOF comprising of the Standards for Training Packages, the Training Package Products Policy and the Training Package Products Development and Endorsement Process Policy.

The training products have undergone proofreading, anti-discrimination assessment and quality checks. They have been reviewed to ensure they are of high quality and comply with the Standards for Training Packages, the Training Package Products Policy and the Training Package Products Development and Endorsement Process Policy.

This process ensures that any barriers to training have been identified, acknowledged, and reduced as far as possible, so learners can gain the skills required to participate in the workforce.

# Checklist for submitting a Training Package assurance submission

To avoid a delay in the processing of your submission, please ensure that your submission is complete. Submissions that are not accompanied by the required attachments will be returned for completion. Confirm the following documents have been uploaded where applicable:

Section	Required Document	Uploaded	n/a
Section 2	Submission Details		
2.2	<ul> <li>Attachment A – Products submitted for assurance including (where applicable):</li> <li>Regulatory, Licensing, or legislative implications (see 5.3)</li> <li>Mandatory Workplace Requirements (see 7.1)</li> <li>Requested extension period details (see 8.5) as required</li> </ul>	V	
	A copy of each product submitted for assurance	~	
	The Companion Volume Implementation Guide	✓	
Section 4	Technical Committee		
4.1	Technical committee membership details	✓	
4.2	A statement that the technical committee has reviewed the draft training products	✓	
Section 5	Consultation Strategy & Activity	_	
5.1	A copy of the stakeholder consultation strategy	✓	
5.2	<ul> <li>The consultation log including (where applicable):</li> <li>Detail about disputes and the stakeholders involved (see 6.1)</li> </ul>	•	
5.3	Evidence of support from all relevant national/state and territory regulatory and/or licensing bodies		
5.4	Evidence of support from Jobs and Skills Councils where the submitted product has impacted their products		
5.6	Evidence to support broad consensus	✓	
Section 6	Dispute Resolution		
6.2	The ADR practitioner's advice		●
Section 7	Mandatory Workplace Requirements		
7.2	Evidence of support for proposed requirements and employer willingness to support learner work placements		
Section 8	Compliance with Requirements		
8.1	The Anti-Discrimination Assessment	✓	
8.2	Evidence to support pathways		