

Mr Gary Dunshea
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Dear Gary

Further to the attached submission, dated 14 May 2018 on Assessment Conditions, I am pleased to make the following additional comments on the public consultation draft report on the Furnishing Training Package Review.

Assessment conditions

CIAL supports:

- adoption of the Draft 1 Assessment conditions statement, and
- removal of specific requirements in units of competency that necessitate work place delivery because the size or configuration of the performance demonstration area.

Packaging rules

The proposal that the 13 elective units can include ‘up to 5 units from Groups A, B, C, D, E or, any endorsed Training Package or accredited course – these units must be relevant to the work outcome’ is problematic and the underlined words should be removed in the interests of certainty.

While flexibility is a good thing, allowing up to 20% of the units for the certificate III in flooring technology qualification to be imported from ‘*any endorsed training package accredited course*’ could significantly reduce the effectiveness of the qualification.

Core units

The proposed new unit, *Establish and maintain a safe flooring technology work environment*, affords adequate coverage for this topic. There is no need therefore to add to the core *Prepare to work safely in the construction industry*. CIAL members commented that White Card is readily available online and that it is only required for union supervised commercial work sites. Adding this unit to the core would disadvantage some students and, to some extent, dilute the technical content of the qualification.

The proposed new core unit – *Inspect and assess flooring installation sites* – is thought to be too large and complex and unfair to those students who are highly unlikely to need to do the unit (e.g. floor sanders). CIAL recommends that the unit be critically reviewed and consideration be given to:

- splitting the unit into a core unit that provides instruction on what to look for onsite; and an elective unit on how to perform the tests, and
- removing from Performance Evidence the requirement for a ‘capacitance moisture test

on concrete’, noting that the test instrument is currently not available to purchase

Prepare subfloors with cementitious coating is another huge unit that would benefit from having the instructional technical content exported to a new elective unit while retaining informative content as a core unit.

In our view, *Plan and cost flooring technology work* is not a core unit as currently drafted. It would be better as an elective.

Given that *Participate in environmentally sustainable work practices* is a core unit, *CIAL* questions the need for other units of competency to include generic content on not only environmental issues but also consumer law. It would be far better in our view to address these issues in a single unit – a core unit if required by Government policy and an elective if not – than to copy similar content to a range of different units, ensuring that students receive exactly the same material a number of times. If duplication of content is unavoidable then I suggest that students be told the reason for this.

CIAL’s comments on *Receive and prepare flooring materials* are as follows:

- In Application and Performance Evidence– for ease of understanding, provide examples if what are ‘*non regulated moving devices*’ (e.g. hand trolley)
- 2.1 and 2.2. – check production batch as well as dye lot compatibility
- to the extent possible, relocate ‘boilerplate’ content to a new common unit.

Carpet elective units

Install carpet cushion and gripper accessories

- change *carpet cushion* to *soft carpet underlay* to be consistent with the terminology of Australian Standard AS 4288 – Soft underlays for textile floor coverings
- as mentioned above, remove repetition of WH&S and consumer law content and export to a generic elective unit
- if repeated generic content must be retained then this and the other units should tell the student why this is necessary and what needs to be assessed
- there is no reason why an Assessment Demonstration for this unit or any other common or carpet unit cannot be performed in a simulated environment.

Install adhesive fixed carpet floor coverings

- clause 3.8 – change to *Install specified protective coverings, if required*
- Knowledge evidence – from the list of products remove (1) foam backed carpet (2) rubber backed carpet and (3) styrene butadiene
- It is not clear why the code needs to be changed if the unit is deemed to be equivalent
- please note that it may be difficult to get work place Assessment Demonstration evidence on direct stick (and dual bond). Simulation is essential therefore.

Install carpet floor coverings to custom design stairs

- the wording of Performance Evidence is unclear
- we strongly disagree with the requirement for at least one Assessment Demonstration in the work place.

Install carpet tiles

- Performance evidence – Assessment Demonstration for one only of the common ‘glueless’ (change to ‘low adhesive’) installation systems
- change backed and unbacked to backing options
- change fixed or unfixed to fixing methods
- disagree that one Assessment Demonstration must be performed in the work place

Install commercial floor coverings

- Performance evidence needs to be reconsidered
 - conventional stretched- in tufted carpet installation (referred to in the unit as ‘carpet gripper strip system’) is not a common installation method in the commercial market
 - the size and configuration of the areas for Assessment Demonstrations cannot be simulated in the classroom and would be unfair to students who do not have access to the specified sites, constituting a breach of the Standards for Registered Training Organisations 2015.
 - for patterned carpet, the key requirement is to demonstrate the ability to install square and straight, to maintain pattern repeat and to match the pattern at the seam
- Assessment Conditions – CIAL disagrees that skills must be demonstrated in the work place for at least one installation.

Install patterned and custom designed carpet floor coverings

- this is a very large unit and the performance requirements are unlikely to be assessable in the normal training period
- CIAL recommends that the assessment requirement be changed to evidence of the student completing a custom feature or custom design
- Remove skills must be demonstrated in the work place for at least one installation

Install unpatterned tufted carpet floor coverings

- Performance evidence – the requirement for an assessment demonstration on a box step stairway of at least 12 steps, is excessive. 3 steps would suffice
- CIAL disagrees that one assessment demonstration must be in the work place on the grounds that the requirement is restrictive and there is no evidentiary basis to support it.

Install synthetic textile floor coverings to sports facilities and outdoor spaces

- Performance evidence
 - the requirements for assessment demonstrations on one outdoor and one indoor installation/recreational/sports area, are unrealistic and unachievable for many students.
 - Assessment conditions require skills to be demonstrated in the work place or in a simulated environment that reflects work place conditions and contingencies, subject to, among other things, ‘use of suitable facilities, equipment and resources including locations requiring synthetic floor covering installation.’ Once again, the drafts over-reaches by effectively mandating work place assessment demonstrations that may not be available to many students.

Certain common units

Remove existing floor coverings

- Performance criteria – Clause 2.2 ‘Check area and flooring for presence of any hazardous substances and take appropriate action’ – CIAL recommends that this section specifically mentions the risk of asbestos in old vinyl tile installations. Traces of asbestos contamination have also been found a few cases in WA in very old hair felt underlay made from recycled hessian bags that were originally used to transport asbestos.
- CIAL disagrees with the requirement for at least one assessment demonstration in the work place

Provide advice to customers on floor coverings

- This unit appears to be a retail sales unit and it is not clear therefore why it has been included in the flooring technology qualification

Install hard underlays

- No comment

Mechanically prepare surfaces for installation of flooring materials

- Retain and modify this unit
- Delete scarifying and shot blasting as they won't be used
- In contrast, grinding and sanding with Polyvac are in common use

Select and fit diamond tools for concrete surface preparation and polishing

Polish concrete floors

- No comment

Select, prepare and apply moisture barriers to complete subfloors

- the unit is not well written
- the unit is relevant to commercial carpet and carpet tiles, not residential carpet
- Performance criteria
 - 3.1 and 3.5 are ‘undoable’ for an engineer and therefore need to be reconsidered
 - 3.2 – the meaning is unclear

Thank you for the opportunity to contribute our comments on the draft report.

Yours sincerely



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Carpet Institute of Australia Limited

21 May 2018



Attachment

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Dear Gary

Thank you for the opportunity to provide feedback on the Draft 2 units of competency that have been developed for the new Certificate III in Flooring Technology, which forms part of the Furnishing 2017 Project.

The Carpet Institute of Australia Limited (CIAL) has taken a strong interest in these units, and although our main focus is on the carpet units, our members are also involved in activities covered by other groupings of units, including those in the resilient, timber, resin and common clusters.

A particular concern has been raised by CIAL members in relation to a new statement that appears in most of the carpet units, as well as many units in the other clusters (although I note that it is explicitly excluded from all of the resin units). The statement appears immediately under the 'Assessment conditions' sub-heading, and reads:

'Skills must have been demonstrated in the workplace for at least 1 installation.'

This is a significant change to the assessment conditions, and CIAL members have pointed out to me that it will have serious implications on the ability of training providers to carry out formal assessments of competency that are in compliance with the Standards for RTOs 2015.

CIAL works closely with various TAFE Institutes and specialist RTOs, and has been advised that ASQA is taking an increasingly strict regulatory approach to compliance audits against the Standards for RTOs. ASQA's own website publishes a range of 'enhanced scrutiny' measures it is progressively rolling out to enforce the Standards, and it also provides regular updates on audit decisions and the names of non-compliant providers who have been sanctioned or had their RTO registrations cancelled.

In addition to the more stringent enforcement of the Standards for RTOs, the provisions in the Standards themselves are also being enhanced. In April 2019, a new set of accreditation requirements will come into force for all trainers, assessors and 'any individual working under the supervision of a trainer'. These provisions will further tighten the compliance requirements imposed on training providers.

Objections to the new statement

In the context of these strict regulatory requirements, I would like to raise the following objections to the statement quoted above that now appears in the ‘Assessment conditions’ of the new draft competencies.

1. Use of the term ‘demonstrated’

The term ‘demonstrated’, when used in reference to an ‘assessment condition’, means that the candidate will be required to undertake a formal ‘assessment demonstration’ in the workplace of at least one installation.

The Standards for RTOs state that all assessment demonstrations must be assessed by a qualified assessor, which rules out anyone who does not hold the TAE assessor skill set or full TAE qualification. Unfortunately, it will have the effect that for every carpet, resilient and timber unit that contains this statement, the candidate will have to organise a date and location with their assessor for the practical demonstration to take place.

2. Implied reference to RPL evidence

The use of past tense language in this statement implies that the workplace demonstration could have occurred at some time in the past, and be validated by the types of evidence that a candidate might submit in an RPL (recognition of prior learning) application, such as photos, letters of support, and so on.

I have been advised that part of ASQA’s increased scrutiny on training providers relates to the evaluation of RPL evidence when making assessment decisions. This can be troublesome for a training provider when the assessor applies the ‘Rules of evidence’ and ‘Principles of assessment’ to the evidence they have gathered. These criteria include: ‘currency’ (how recent was the installation?), ‘authenticity’ (how do we know that the candidate actually carried out the full installation without prompting or assistance from their workplace supervisor?) and ‘sufficiency’ (did the installation cover all performance criteria specified by the competency?).

3. Mandatory requirement for workplace demonstration

The mandatory requirement for an assessment demonstration to be carried out in the workplace increases the burden on both the RTO and the candidate to comply with the Standards for RTOs.

From the candidate’s perspective, they need to find a suitable jobsite that will let them demonstrate all the criteria listed in the competency. If they are unable to nominate a suitable jobsite within a reasonable timeframe and make all the necessary arrangements with the assessor, they may have grounds for claiming that their training provider is imposing unreasonable conditions on them, and not complying with two other ‘Principles of assessment’, namely: ‘fairness’ (candidates in remote areas would have more trouble than those in capital cities in organising suitable dates and locations) and ‘flexibility’ (the assessment procedures must be sufficiently flexible to allow for a range of conditions and different environments).

4. Additional compliance requirements for ‘workplace assessments’

In July this year, ASQA will introduce a new set of compliance requirements for recently registered RTOs. One of these is a ‘Self-assessment form’ that must be submitted by the training provider with any extension to scope application.

Among other things, this form will require RTOs that use ‘workplaces’ as training or assessment venues to provide evidence to ASQA of the leasing arrangements relating to the site, written agreements with the site owners and on-site facilities provided to the candidate. These provisions will need to be formally verified because the RTO is deemed to be responsible for the site and the candidate while carrying out formal training or assessment events at that location.

Proposed solution

CIAL supports the spirit of the new ‘Assessment conditions’ statement. We acknowledge that its main intent is to ensure that candidates are able to apply their skills and knowledge in the workplace, and perform the tasks described in the unit of competency consistently on-the-job and under a range of varying on-site conditions.

We agree with the principle that all candidates should provide workplace-based evidence that they are able to successfully apply their skills and knowledge to the jobsite at a trade-level standard before they are signed off as ‘competent’ by their assessor. However, this is not the same thing as a mandatory formal assessment at a worksite by a qualified assessor.

There is already the requirement in the current Flooring Technology competencies that candidates must provide evidence of consistent performance and application of skills and knowledge in the workplace, prior to being signed off as competent by the qualified assessor.

The ‘Assessment conditions’ in the current units include the following statements:

- *Assessment methods must confirm consistency of performance over time rather than a single assessment event and in a range of workplace relevant contexts.*
- *Assessment must be by observation of relevant tasks with questioning on underpinning knowledge and, where applicable, multimedia evidence, supervisor’s reports, projects and work samples.*
- *Assessment must occur on the job or in a workplace simulated facility with relevant process, equipment, materials, work instructions and deadlines.*

These statements satisfy the ‘Fairness’ and ‘Flexibility’ provisions in the ‘Principles of assessment’, since they allow the formal assessments to be undertaken either on-the-job or in a simulated environment, such as a specialist training facility in a TAFE Institute or flooring manufacturer’s warehouse.

We have been advised by the TAFE Institutes and RTOs we have consulted, that when the formal assessment events are carried out in a simulated environment, the workplace-based confirmation of skills and knowledge can be verified via a comprehensive ‘third party report’ from the candidate’s supervisor. To be acceptable, the report must include sufficient information for the assessor to make a valid judgement on the candidate’s ability to apply

their skills and knowledge on-the-job with a ‘...consistency of performance over time ... in a range of workplace relevant contexts’ (as stated above in the first dot point).

Third party reports are accepted by ASQA as valid examples of ‘supplementary evidence’ and are used to support the assessment decisions made by a qualified assessor. However, they are not a substitute for the direct evidence that must be gained by the assessor, generally through direct observation of the candidate while they perform a practical demonstration of their skills.

NSW TAFE has confirmed with that state government funded training is audited by Training Services, in addition to ASQA, and that a mandatory requirement for apprenticeship training is an employer’s ‘confirmation of competency’ for every unit the apprentice undertakes as part of their qualification. We believe the same requirement applies in the other Australian states and territories.

CIAL strongly urges IBSA to remove the new statement that requires a mandatory assessment demonstration of skills in the workplace. We believe that this would be unnecessarily onerous on training providers, apprentices and their employers, and that it would be particularly unfair on regional and rural apprentices. It could result in some apprentices being unable to finish their qualification, simply because their employer was unable to provide a workplace installation that met all competency demonstration criteria and the assessor’s timetable for travel commitments.

Our recommendation is for the current wording in the ‘Assessment conditions’ to be retained (as quoted above).

After further consultation with members, CIAL will provide comments on the units of competency and packaging rules.

Yours sincerely



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14 May 2018