

Common Issues of Non-Compliance

Trainer/Assessor Competence & Currency

Every provider will have their own requirements for trainers/assessor competence and currency however, they will all commence with the minimum requirements relevant to their industry area and the units of competency that they are delivering and assessing. Each provider's requirements will be clearly articulated in their own policies and procedures however, the basis of their policies and procedures originate from, at the bare minimum, requirements from the NSSC, industry requirements, external accreditation and licensing authorities and additional legislation and licensing requirements. An example is to take the unit of competency HLTA311A – Apply first aid (current at time of publishing) <http://training.gov.au/Training/Details/HLTA311A> a very common unit of competency found in many qualifications as an example (superseded on 1 July 2013). **HLTAID003 - Provide First Aid (current)** released on 1 July 2013 introduces even more significant changes, particularly around trainer & assessor competence.

This particular unit of competency has recently seen some significant changes that meant that the unit is not equivalent to its predecessor HLTA301C – Apply first aid. The unit changed on 7 May 2012 meaning that currently, as the unit has been released for more than 12 months, no further students should be enrolled in the old superseded unit of competency (*they commonly are though*). It also means that every trainer and assessor who is delivering and assessing the new unit of competency must be able to demonstrate that they hold the current unit of competency or demonstrate equivalence to this unit of competency to meet the NSSC requirements, requirements under AQTF and the VET Quality Framework. The demonstrated equivalence must include not only knowledge but current skills evidence against the gaps between HLTA301C – Apply first aid and HLTA311A – Apply first aid.

Further, an external body, namely the Australian Resuscitation Council (ARC) require that the CPR component of this unit of competency is renewed annually. In addition to the ARC guidelines, guidelines of Australian national peak clinical bodies and State / Territory legislation and regulations usually specify that the units of competency HLTA301C – Apply first aid and HLTA311A – Apply first aid are valid for a period of 3 years only. If we also look at for example the unit regarding medications, CHCCS424B – Administer and monitor medications, it is also clearly stated within the unit of competency that annual reconfirmation of knowledge and competency by the employer within the performance management framework is mandatory.

So in terms of who is qualified and experienced in accordance with the NSSC guidelines, AQTF and the VET Quality Framework to deliver and assess the units HLTA301C – Apply first aid and HLTA311A – Apply first aid, all of these minimum factors **must** be taken into account by a provider.

Vocational Competency

To look at 1.4(b) regardless of whether it is the NVR Standard or AQTF Element, we can see that it is the NSSC that requires that trainers and assessors have vocational competencies at least to the level being delivered or assessed. Providers therefore must have this as their basic minimum requirement for vocational competency.

If we look at 1.4(c) regardless of whether it is the NVR Standard or AQTF Element, we can see that it is the NSSC that requires that trainers and assessors have currency in their industry skills that are directly relevant to the training and assessment being undertaken. For example, a situation that we at RTO Doctor often find is that trainers and assessors in the nursing industry who are qualified registered nurses will often be employed to deliver and assess in aged care courses without any consideration being given as to whether or not their current skills, knowledge and professional development include aged care related knowledge and skills. An excellent extreme example is the registered nurse who has 20 years experience working as a registered nurse in a paediatric hospital being engaged as an aged care trainer and assessor. The more common example however is the registered nurse who has been working in general nursing perhaps in the day surgery unit however has not had any experience specifically dealing with issues related to aged care or the units that they are specifically delivering and assessing. For example, if either of these registered nurses were engaged to deliver and assess the core unit of competency from CHC30212 – Certificate III in Aged Care, CHCAC318B – Work effectively with older people, it may be very difficult for them to evidence that they have current knowledge and skills to deliver and assess a significant amount of the unit of competency including a large number of the elements of competency, performance criteria, required skills and knowledge or even be able to assess one of the fundamental critical aspects of assessment 'The individual being assessed must provide evidence of specified essential knowledge as well as skills' for if the trainer/assessor doesn't possess them, how can they recognize them to assess them?

Occupational licensing & registration

The consideration of industry currency under item 1.4(c) also refers to maintaining any occupational licensing or professional development requirements. So, for example to continue with the registered nurse theme, it would be expected that if it is those qualifications and that industry experience that is being used as the principle evidence for staff competence, then the registered nurse would need to be able to demonstrate that they have maintained their professional registration requirements with the Australian Health Practitioner Regulatory Agency (AHPRA) and that any conditions on their registration are noted and monitored if relevant. For an accountant for example delivering financial services qualifications, one would expect to see that the accountant has maintained their CPA registration (or similar) and that they have maintained their Continuing Professional Development (CPD) requirements.

For those trainers & assessors without occupational licensing or registration requirements, currency is not very clearly defined by the regulatory authorities. It would be expected however that, where occupational licensing or registration is not a requirement for your industry, that you can demonstrate not only developing your vocational knowledge but also your vocational skills. For example, it is one thing to have a forklift license that was issued 10 years ago and for you to be teaching others how to drive a forklift today but if you've not driven a forklift in the past 10 years, it is highly questionable whether you really have the vocational competence to be able to deliver and assess that unit. So many things have changed regarding the delivery and assessment of forklift training in the past 10 years, just at a training and assessment level and that doesn't even consider the changes in the forklifts themselves that have occurred in the past 10 years, that it would make it impossible for your knowledge and skills to be deemed current. Likewise, if you worked as a trainer and assessor 10 years ago with the old BSZ qualification but you went back to industry for a few years and have only just decided to come back, it is highly unlikely that your knowledge and skills would be current. The training and assessment industry has undergone incredible change in 10 years and two training packages that if you've had no training and assessment experience in the past 10 years in a nationally recognized training environment, it is highly improbable that your skills could genuinely be recognized as current.