

SIA OHS Education Chapter – Submission Paper to Scoping of BSB07 OHS Qualifications

Organisation:	Safety Institute of Australia
Suburb/City:	Tullamarine
State & Postcode:	VIC 3043
Principal contact:	PJ Fleming MOHS FSIA RSP (Aust)
Position:	Vocational & Workplace Training Group – Safety Institute of Australia
Phone:	0439 605 217

This submission has been prepared by the SIA OHS Education Chapter on behalf of the membership of the Safety Institute of Australia. The SIA OHS Education Chapter is a special interest group within the Safety Institute of Australia with the objective of promoting the integrity of the OHS profession and improving health and safety in the workplace by enhancing the quality and sustainability of OHS education.

The submission has been informed by a questionnaire circulated to over 3500 members of the SIA which resulted in 176 responses (approx. 5% of the SIA membership). Respondent demographic information is provided at Attachment A.

Comments on the Scoping Review of the OHS Qualifications and Units of Competence within the BSB07 Training Package	
Specific Issues / Themes	Comments
OHS Industry Profile	
1 (a). Are there changes in traditional work roles?	<p>Segmentation and professionalization of the role</p> <ul style="list-style-type: none"> The OHS role has become segmented with the traditional OHS advisor role professionalized. The SIA grading requirements now require a Bachelor degree or Graduate Diploma/Masters for professional recognition. This leaves a practitioner role (VET qualified) and the ‘juggler’ who has a basic OHS role along with other functions. (This segmentation has been initiated and supported by the Victorian Regulator, with varying support from other jurisdictions; Worksafe Vic has been working with the other Regulators for some time on this issue.) The Safety Institute of Australia (SIA) considers that there is a role for both practitioners and professionals in the occupational health and safety (OHS) function and that these roles are different in scope and nature; however this difference has not been recognised or articulated. This position is reinforced by feedback from those working in the OHS function as well as employers. The practitioner role referred to here is different to that of the ‘juggler’ as defined by WorkSafe Victoria which the SIA sees as a different function, as is the role of the health and safety representative.

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	<ul style="list-style-type: none"> Historically, the SIA grading criteria provided for two routes to recognition as an OHS practitioner / professional; an OHS degree or post graduate diploma plus three years experience or an OHS diploma plus five years experience. This lack of differentiation of function for those with varying education backgrounds is also apparent in the results of an international survey of the tasks and activities of OHS advisors (Hale & Guldenmund, 2006) where Australia was the only country where there was not a clear differentiation between vocational qualified OHS personnel and University educated advisors. The SIA position changed in February 2009 when the SIA identified the need for professional qualifications and changed the criteria for professional grade of membership to an OHS degree or OHS postgraduate diploma/masters. This change in requirement for professional recognition was implemented nationally on July 1, 2009. Recent developments in the UK, Europe and the USA to differentiate the professional role have resulted in the professional bodies in those countries introducing an 'OHS Technician' title. It is not clear whether this role and title is relevant to, or acceptable by, the various Australian stakeholders. The SIA is currently undertaking a project to clarify the different roles of the VET trained OHS practitioner and the university trained OHS advisor. The outcomes of the project would inform any review of the OHS practitioner competencies and qualifications. <p>Definition of the OHS body of knowledge</p> <ul style="list-style-type: none"> One of the issues hampering OHS education and training is the lack of clarity over the knowledge required for fulfilling the role of an OHS advisor. A major project, funded by WorkSafe Victoria, and involving OHS educators and OHS professionals nationally, will define this required knowledge. While this project targets the university-trained professional there will be trickle-down effect that should inform the revision of the competencies and qualifications.
1(b). Does it vary across different business sizes?	<ul style="list-style-type: none"> Not so much across business sizes but more across Industry Sectors. Many respondents commented that the current training package is not industry specific enough. (This may well be a reflection on the quality of training providers). There is a need to make industry based learning more relevant with increased levels of practical application based around 'real life/issue' case studies.
2. Other OHS industry changes/trends like to affect future vocational skill requirements.	<p>Respondents require:</p> <ul style="list-style-type: none"> increased levels of industry training; (meaning training for specific industry contexts and the need to make adjustments based upon the different environments, cultures and industrial applications, etc. (This could be a reflection of the ability and experience of the trainer.) improved levels of practical application and emphasis across a wider variety of industries ;

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	<ul style="list-style-type: none"> ensuring more timely review and updating of content and materials to reflect legislative (ie model WHS Act, etc), technical and scientific changes; industry does not always fully support students during their vocational training programs; at the Advanced Diploma level, there is a real need for more coverage of the strategic influences affecting organizations; More exposure to a variety of industries (including high risk).
OHS Regulatory Arrangements	
3. Role BSB07 Qualifications /Units play in supporting OHS Regulation?	<ul style="list-style-type: none"> A number of respondents thought that the OHS Law competency was too generic; Need more on influencing skills and interpretation of laws/legal concepts; Some providers teach specifically to their state OHS legislation and do not cover other OHS legislation such as dangerous goods, hazardous substances, etc;
4. If approved HSR Training Courses are provided, do you currently use or prefer to any BSB07 Quals/Units or materials in assessing or approving those courses?	<ul style="list-style-type: none"> Refer to SIA members comments at 8(a).
5. Are there gaps or shortcomings in current suite of BSB07 Quals/Units from a regulatory perspective?	<ul style="list-style-type: none"> Some respondents thought that the Law Competency could be broader with more depth. (This may be a reflection on who is providing the training)
6. Will new model WHS Act present any challenges/opportunities for the current suite of BSB07 qualifications?	<ul style="list-style-type: none"> Only from the position of IBSA having the capability to undertake and capture the required changes and amendments to course materials/resources/etc in a timely manner for Industry. Revision of all materials must be mandatory. The application of the Model legislation will need to be integrated within relevant qualifications.
7. In what ways could BSB07 OHS Qualifications better assist the training needs of those affected by model Act requirements?	<ul style="list-style-type: none"> Risk management is an important principle throughout the training package. The Model Act will need to be integrated into many of the competencies not just the OHS Law competency

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8. Under model WHS Act, HSRs will need to attend training which is approved by Regulators in order to be able to issue PINS. In what ways could BSB07 better assist to assess or approve HSR Training Courses?	<ul style="list-style-type: none"> Under the two competencies, Law and Consultation, these aspects are currently covered.
8 (a). Assessment of HSRs under the National Training Package	<ul style="list-style-type: none"> A majority of respondents have no concerns with the notion of assessment of the competence of HSRs being undertaken. However, the 20% that did express a concern were adamant that there is a need for consistency in the facilitation of HSR training, particularly with the national model WHS legislation pending. Secondly, that there must be a national standardised approach to the qualification and the assessment. On the other hand, a number of respondents indicated that assessment may discourage employees voluntarily becoming HSRs. Others identified a need to assess trainers and assessors of HSR course delivery. It is vitally important that trainers and assessors have the appropriate OHS qualifications and experience. The SIA recommends that they have one level above that which they are teaching – At Least. Some respondents suggested regular refresher training.
Demand for OHS Training	
9. Are the current BSB07 OHS Qualifications of value to Industry? Do they meet both current and anticipated needs?	<p>Yes</p> <ul style="list-style-type: none"> Members who had completed VET training made comments with about half responding positively eg <i>'contributed to their learning', 'good stepping stone', 'wetted appetite'</i>. The negative comments (about half) were; too basic, lacked practical elements, did not address real issues, needed more on OHS research. Note: this may be a reflection on delivery and the participant's prior industry background and experience, also noting that training in OHS research usually occurs at higher level qualifications. These are also examples of the types of confusion over what a VET Qualification is meant to deliver.
10. Which qualifications/units are in most demand? Why?	<ul style="list-style-type: none"> Unable to respond

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11. Are there any major barriers to greater uptake of these qualifications and units?	<ul style="list-style-type: none"> • Unable to respond
Content & Structure of Generic Units	
12. Do you have a view on the value of the current BSB07 OHS generic units?	<ul style="list-style-type: none"> • Some of the respondents indicated that they like the following content areas: Hazard Identification, OHS Consultation, OHS Management Systems and Risk Management. • A number commented on the useful blend of practical knowledge and theory. • It should be noted that in some cases these generic units are designed for employees or supervisors where OHS is not their main role. These units are not always appropriate for people who are studying to become an OHS practitioner. • The SIA would like to be involved in further analysis of the mapping exercise.
13. Would you support substitution of any or all of the relevant Safe Work Australia generic OHS units for the current BSB07 generic units?	<p>The Safe Work Australia competencies are generally good with two exceptions:</p> <ul style="list-style-type: none"> • OHS456 is mistakenly described as 'OHS Technician' or 'OHS specialist'. This is absolutely an error! It is intended for workplace technician or specialist (such as tradesperson) whose work has OHS implications but who do not supervise others and so for whom OHS400 is inappropriate. The application is actually correctly stated. • Use of language or lack of definition or clarity. Eg 1: OHS 100, 2.1 Identify basic principles of risk management. This is entirely inappropriate at this level. Perhaps it means hierarchy of risk control. Needs to be clearly stated what is meant. Eg 2: OHS 100, 4.1 Identify and explain principles for first aid. Surely in this context it should read '.... For obtaining first aid.' There are a number of other examples of lack of clarity or definition. • It is a difficult issue to address at this stage as they were never designed to replace VET developed competencies. • This needs a lot more research and consultation as these generic units were developed to merely inform and assist developers of units of competency. Further research and consultation must occur to ensure their robustness and relevance.
14. Should BSB07 incorporate additional generic units such as the Safe Work Australia generic units OHS100, OHS600 and/or OHS456?	<ul style="list-style-type: none"> • No - see 13 above

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15. Should the generic units be available as electives within the BSB07 OHS qualifications?	<ul style="list-style-type: none"> No - see 13 above
16. Do you have any views on the current availability of BSB07 generic units within other BSB07 qualifications and/or other Training Package qualifications?	<ul style="list-style-type: none"> Nil
Content & Structure of Qualifications	
17. Are the descriptors, roles and indicative titles in the current BSB07 qualifications an accurate and meaningful reflection of current industry roles and titles for these levels?	<p>No. The descriptors appear to have been written by applying generic AQF descriptors which relate to roles such as supervisor, front-line manager and have little relevance to OHS which is usually a solo technical role.</p> <ul style="list-style-type: none"> Cert III should not be providing technical advice to a team. An HSR role is facilitate consultation it is definitely not to provide technical advice. A Cert III in OHS is not a skilled operator in relation to OHS. The job role for Cert III could be an HSR or committee member. A Cert III could help a juggler but a juggler is really a different set of skills. There is no such role a Health and Safety Assistant. Cert IV: This is considered the very beginning of the practitioner role. It is important that the limitations of the qualification are highlighted. May well be a part time role (more likely than full time) <i>“works under the supervision of a higher qualified practitioner or professional”</i> is appropriate wording. A Cert IV would not be expected to provide leadership and would/should never have responsibility for the output of others in relation to OHS. Could be titled ‘officer’. Diploma: Most likely to be a ‘coordinator’ (not manager; senior OHS officer not a title that is used. This is the role that is particularly poorly defined as in the past it has often merged with the role of the university qualified professional. This is the level that the SIA sees as the practitioner. Advanced Diploma: This qualification level has a low take up as most see that they are better to get university level qualification. This job role would not be seen as a specialist or senior consultant under the SIA professional grading criteria list.
18. Does the content of the current BSB07	Yes

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OHS qualifications/units meet industry needs?	<ul style="list-style-type: none"> The positive comments were; a mix of practical knowledge and theory, provision of workplace skills and hazard identification, technical training for practical application, OHS management systems, risk management, incident investigation, consultation and change management. The negative comments were; too much rule based, base level qualification only, better assessment tools required, only provides basic understanding of OHS. This is really about the type and level of OHS advice that Industry requires. The current SIA OHS Professional / Practitioner Project will provide clarity around the definition of 'what are industry's OHS advice needs'. The Victorian Suitably Qualified Publication has contributed to the discussion and the SIA project will extend this work.
19. Is there a sufficiently clear differentiation between units within and across current BSB07 OHS qualifications?	<p>No</p> <ul style="list-style-type: none"> There is considerable overlap and repetitiveness with similar elements and PCs that have to be taught at higher level, which makes it very difficult to develop learning programs eg OHS 403/404 and 504; 401 and 501. This has arisen partly due to the lack of pre-requisites. There were a few comments suggesting that there is overlap, however this may be a reflection on how the RTOs deliver the training as some competencies should be taught together and not separately.
20. Should the qualification packaging rules be changed in any way?	<p>Yes</p> <ul style="list-style-type: none"> Prerequisites should apply eg. must do Cert IV before Diploma etc. BSBOHS407 should be removed as an elective. This is a generic unit and not appropriate in the practitioner qualifications.
21. Would you support re-packaging the Certificate III as proposed?	<ul style="list-style-type: none"> See comments at 8.(a) above.
22. Would you support substitution of the RABQSA Lead OHS Auditor competency units for equivalent units within the Advanced Diploma of OHS?	<p>No</p> <ul style="list-style-type: none"> Not without further extensive investigation into the implications. The SIA strongly recommends that this issue be taken off line pending more time to investigate the full extent and ramifications of such a proposal. The SIA would like to take the lead in undertaking a mapping exercise and analysis of the RABQSA and VET AQF level 6 units of competence for OHS Auditing as detailed within the IBSA Discussion Paper (page 11). There are particular and quite different perspectives associated with Quality and OHS auditing; ie Quality Lead Auditors do not always make credible OHS Management Systems auditors. The skill set of the OHS Lead Auditor is and must be totally different in order to fully appreciate OHS systems and their the component parts, the relationships between each, safe systems of work and associated methodologies, the

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	<p>requirements of leading a multi-disciplinary approach to gathering objective quality OHS evidence, etc.</p> <ul style="list-style-type: none"> • There are specific differences between an OHS audit tool (as used in the field) and SMSs implemented/adopted in workplaces. • A key character trait of an OHS Lead Auditor (grounded with OHS background) is the ability to separate irrelevant information from what is useful as part of the overall validation/verification process. Some OHS gems may be provided, retained and then used again to re-confirm and validate the objective quality evidence. Others may not be re-used. OHS auditors must have significant knowledge of OHS issues that may arise in order to interrogate further and make decisions and judgments about legislative compliance, etc. Quality based auditors do not always possess this knowledge and skill. The investigations of a number of disasters have shown that implications for an OHS auditor getting it wrong may be injury, fatality or multiple fatalities. • Industry engages and sources its OHS auditors from a variety of providers not just RABQSA and the Safety Institute. • The RABQSA assessment process needs to be evaluated further as we are unsure whether it aligns with VET processes.
<p>23. Are there any significant gaps in the current suite of BSB07 OHS qualifications?</p>	<p>Yes</p> <ul style="list-style-type: none"> • The current OHS competencies and qualifications focus on generic skills. There is a major gap on that 'technician' skills are almost non-existent. There should be competencies which specifically address skills such as: <ul style="list-style-type: none"> • Conduct a workplace inspection • Lead development of a Job Safety Analysis • Prepare a standard operating procedure • Conduct a non-complex risk assessment (limitations should be clearly defined). • Support the function of an OHS committee • Develop an OHS learning program to address a specific issue • BSBOHS 406 addresses some of these technician skills but is only an elective. • BSBOHS502 also addresses some support skills such as monitoring trends, producing reports but there is too much design (which would normally be done by a professional) ie. they should be seeking professional advice in this area. <p>Respondents suggested the following content areas;</p> <ul style="list-style-type: none"> ➢ Human factors/ergonomics, ➢ auditing, logic training, ➢ marketing OHS, ➢ behavior based safety and safety culture,

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	<ul style="list-style-type: none"> ➢ safety management system plans, ➢ corporate governance, ➢ occupational hygiene, hazardous substances, ➢ risk management, ➢ more on the job training, ➢ emergency management, ➢ influencing skills. <ul style="list-style-type: none"> • There is a view by many SIA members that the current training package is seen as being too generic in content, missing important components such as: <ul style="list-style-type: none"> ➢ occupational hygiene, ➢ shop floor based safety leadership, ➢ OHS marketing, ➢ assertiveness and influencing skills. • This is particularly the case with the Cert IV and Diploma while the Advanced Diploma requires more content on strategic thinking. • Supervisors and managers of VET Sector trained OHS practitioners want additional learning in areas such as: industry specifics, researching skills, logic training, safety management plans, legal principles/concepts/interpretation, corporate governance, occupational hygiene, hazardous substances, deeper understanding of the nature of hazards, incident investigation, auditing, human factors, risk management, and more on-the-job training coupled with practical assessments.
<p>24. From a provider perspective, are there any other impediments to the quality delivery of these qualifications?</p>	<p>Yes, there are a number of issues impacting on the quality of delivery.</p> <p>Qualifications of trainers and assessors:</p> <ul style="list-style-type: none"> • Currently, trainers and assessors are only required to have the competency in which they are training /assessing plus TAA Cert IV. This means that they could be training or assessing in complex topics such as risk assessment with little knowledge or experience in the topic. OHS issues are complex and may have many nuances which may not be obvious to the person with little in-depth knowledge or experience. At the least trainers and assessors should have the relevant knowledge and skills at least one qualification higher than at which they are training/assessing. <p>Interpretation of the competency statements:</p> <ul style="list-style-type: none"> • The competency statements are written in such a way that they may be interpreted by different persons (with different backgrounds) in different way and at different levels of complexity. The variation in duration of the offerings of different providers is testament to this. See also the diverse views below and on Support Resources Q 25.

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	<ul style="list-style-type: none"> • The lack of definition of the OHS body of knowledge also contributes to this variation in interpretation. <p>Some comments regarding the levels of satisfaction and/or impediments with the quality of delivery were as follows</p> <ul style="list-style-type: none"> • Better training delivery; • Better trainers; • Improved assessment and assessment strategies; • To many scrape through - too easy to pass; • More auditing of RTOs/ provider organizations; • Differences in the standards of RTOs; • Poor teaching skills; • Variation in the quality of trainers; • Utilize more than one trainer; • Improved training delivery including better trainers, facilitators, lecturers as there are too many inconsistencies in the quality, availability, experience, competence and enthusiasm of trainers; <p>One respondent's response was: "Pay \$2000, provide CV and get your Advanced Diploma in OHS" – on-line delivery.</p>
Support Resources	
25. How useful are the current BSB07 support resources?	<p>A mix of comments was received in relation to this issue. On the positive side:</p> <ul style="list-style-type: none"> • Well laid out and up to date; • Use of a CD ROM as back-up was beneficial; • All relevant information was supplied by the RTO; • Use of and access to Safety Line Institute Resources improved consistency; • "Everything I needed"; • Relevant case studies were useful; • Program notes were well prepared. <p>On the other hand:</p> <ul style="list-style-type: none"> • Poorly resourced RTO; • RTOs don't have the resources of TAFE; • Needed access to Australian Standards / ISO etc , which cost; • Monitoring equipment supplied was poor; facilities inadequate; • Outdated / misinformation / typo's;

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	<ul style="list-style-type: none"> • High cost to purchase; • Dependent on the quality of RTO's; (ranging from very good to abysmal / shocking); • More specific information required such as guiding principles.
26. Are there any significant gaps in resource materials to support BSB07 OHS qualifications and/or generic units?	<p>A number of useful suggestions were provided by respondents:</p> <ul style="list-style-type: none"> • Provision of more on-line services/E-learning including: <ul style="list-style-type: none"> ➢ scientific papers, ➢ assignments, ➢ CD ROMs, ➢ Pod Casting, ➢ access to Australian Standards, etc. • More participation in mentoring programs, particularly with TAFE Institutions; • More opportunities for work experience as part of the program/course; • Access to national OHS resources for all VET trainers; • Partnerships with RTOs and provider organisations; • Accessibility of quality resources generally; eg hands on monitoring equipment; • Current support equipment to the occupational health/hygiene components leave a lot to be desired;
27 Other issues / considerations	
On the job training Assessment	<ul style="list-style-type: none"> • Most of the work in the suite of courses requires participants to show competency OJT via assignments. This is often difficult for those that are not working in the OHS field during their course of training.
The VET sector does not fully understand OHS	<ul style="list-style-type: none"> • This is highlighted perfectly in the email feedback from a recent participant in a Cert IV Frontline Management Course – see Attachment B
Need for improvements in the accreditation of RTOs	<ul style="list-style-type: none"> • There is also a concern by members about the accreditation of RTOs particularly in relation to the OHS component of the audit process by State Training Authorities.
Accessibility of equipment	<ul style="list-style-type: none"> • Some RTO's are not teaching the competency "Use of Monitoring Equipment" because of the difficulty in

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	accessing the monitoring equipment, finding someone with appropriate skills and experience to teach the competency and students having difficulty in accessing the equipment to complete assignments. But should not prevent them undertaking the teaching of technician type skills. (These comments came from a number of OHS educators / trainers.)

In summary, the SIA has highlighted the following:

- the unit descriptors may not reflect what is occurring in industry in terms of OHS positions available;
- the generic nature of the competencies, which does not address specific skill development ie. the ‘technician’ role;
- major concerns in the quality of delivery of OHS training;
- minimum trainer qualifications to deliver vocational OHS training courses;
- concerns about fast tracked courses and the level of teaching content and depth eg. The example of the \$2000 Advanced Diploma on line; and
- the importance of pre-requisites.

Historically, VET courses have provided employers with employees that possess practical hands on skills. The SIA survey indicates that some RTOs may be teaching more of the OHS management type competencies and less on the practical application needs such as those associated with noise, lighting, air sampling, dust level monitoring, etc. While the SIA believes that the generic units are beneficial to supervisors and employees, they are not at a sufficient level for OHS practitioners.

There is still much confusion and misperception over the application of the roles and job titles in the health and safety space which impacts on the interpretation of the qualification levels.

Finally, there is a real need for visibility of the quality and practice including underpinning knowledge and skill of all OHS trainers and OHS training assessors.

PJ Fleming FSIA
SIA Education Chapter
Vocational & Workplace Training Group
Safety Institute of Australia
Mob: 0439 605 217;
Email: peter.fleming4@defence.gov.au

DEMOGRAPHIC INFORMATION

ATTACHMENT A

In preparing its submission to the Scoping Review, the SIA OHS Education Chapter surveyed its membership to capture issues, concerns and comments relating to the IBSA Review of the BSB07 OHS Qualifications. This consultation enabled the SIA OHS Education Chapter to compile its submission.

Respondent demographic information is provided for background and context.

1. There were a total of 176 respondents to the survey, representing approx 5% of the SIA membership;
2. The majority of respondents were non-graded members (41%) with an additional 68 Chartered Professional members (39%).
3. Majority are internal OHS advisors (40%), followed by consultants (30%) and managers (24%).
4. Of 176 respondents, 70% (124) had completed an OHS VET qualification.
5. Of those completing a VET qualification, 58 (47%) had a Diploma, 21 (17%) a Cert IV, 4 (3%) a Cert III and 37 (30%) an Advanced Diploma.
6. As practising OHS practitioners/professionals, 32% have been in the role for greater than 15 years, while 47% have between 6 and 15 years experience in the role.
7. A majority of respondents 70% (122 of 176) were greater than 41 years of age; Only 7 identified as less than 30 years age.
8. More males than females responded to the survey indicated in the ratio of 3:1;
9. Using the National Priority Industries as a guide, respondent industry sectors were as follows:
 - a. Manufacturing: 16
 - b. Agriculture/Forestry/Fishing: 5
 - c. Construction: 20
 - d. Healthy & Community; 17
 - e. Transport & Storage; 9
 - f. Government; 31
 - g. Power/Electrical/utilities; 9
 - h. Mining/Resources; 25
 - i. Education/Research; 9 and
 - j. Others; 35.
10. A majority of respondents were employed in medium to large organisations with 34% working in organisations with up to 1000 employees, 11% identified as organisations with 501 to 1000 employees. Only 10% of respondents worked in organisations with less than 100 people.

An Example email feedback from a recent participant in a Cert IV Frontline Management Course

From: xxxxxxxxxxxxxxxx
Sent: Thursday, 17 September 2009 4:31 PM
To: xxxxxxxxxxxxxxxx
Subject: OHS Modules delivered by non-OHS Professionals

Hi xxxxx,

I thought it worth mentioning that I've been undertaking a Cert IV in Frontline Management with a local provider. The course itself has been going well, and last month we were scheduled to complete the module BSBOHS407A Monitor a Safe Workplace.

What was interesting was that the module was scheduled to take a full day, but due to the need to catch up from previous training days, and time lost, in reality we probably spent about 3hrs on the module. The notes provided were based on the NSW OHS Act, which in itself was really disappointing given that the majority of participants would have had no prior OHS knowledge. To date we still have not been provided with notes updated to reflect the Victorian OHS Act. This can only promote the notion that while OHS may be a 'core' unit in many qualifications, it's certainly not being given the same importance as other units that have been taught.

The facilitator was not an OHS professional - no formal OHS qualifications, little to no OHS experience in industry, and was the same trainer that had taken the majority of other units in the course. While reference was made to the Maxwell Review of the Act, the Act itself was not referred to in any depth, although there were a range of OHS publications produced by WorkSafe displayed to participants.

I found it interesting that when sent out of the room to undertake a Hazard Identification of the training venue, there was no context provided for what constituted a hazard, what was an energy, no reference to the hierarchy of controls, and when returning to the classroom, no information provided on what you did with the 'hazards' identified i.e. no risk assessment or control conversation/discussion.

This is the second course I've undertaken recently that has had an OHS module incorporated into the qualification. The previous course also treated the OHS module in a cavalier fashion, failing to give the module the credibility and importance it deserved. I wonder if this is due to the trainer also having no OHS experience or qualifications?

Perhaps those that teach OHS modules should be required to have their own OHS qualifications and/or experience?

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