

Compliance and Short Course Training November 2024

Executive Summary

As the standard-setting body for Construction and Infrastructure, Waihangara Rau is responsible for standards that are being used as standalone courses across several of our industry sectors. They are generally defined as compliance training and cover topics such as Working at Heights, Elevated Work Platforms, Cranes, and driver's licence endorsements. The standards are some of the highest reported standards across our sectors, and we have categorised these as high-risk and high-credit-value standards.

Waihangara Rau has undertaken a project to better understand how compliance training is being delivered and how the outcomes are meeting the expectations of industry. Generally, the assessment resources being used have passed the desktop post-assessment moderation process over several years, but post-assessment moderation doesn't tell the full story.

The previous standard-setting bodies had learners undertaking this training as part of a programme and/or had contracts with the specialist providers and training companies to deliver the training for them, so there was a potential conflict of interest in play.

As an organisation we have looked beyond just moderation for these standards and through our own internal reflections the same themes have kept appearing. This suggests there are unresolved issues with the achievement of these standards and that the outcomes are not meeting industry expectations. We have the opportunity to work with industry and providers to resolve this long-standing issue and have taken a stance that we are not prepared to just accept what has been previously deemed acceptable based on good moderation results alone.

It was clear from our industry engagement that industry expectations do not meet the expected outcomes of the standards being used. The gap is the learners experience in the workplace to be able to reinforce and demonstrate competency in the skills being assessed.

RECOMMENDATIONS

The recommendations from this project are categorised into two separate areas due to the specific nature of the recommendations. There is additional context around the recommendations in the body of the report, including recommendations that relate to the delivery of these standards for secondary school students.

Industry Compliance Training and Short Courses

These recommendations relate to the delivery of compliance and standards to learners who are working in, or seeking opportunities in, industry. The current delivery and assessment of these standards is through the use of short courses and assessment is undertaken in a simulated environment.

1. A Guidance Document is developed for industry and providers outlining the purpose, suitability, intended outcomes, and expected competency level for those standards that are currently being delivered via short courses.
2. Review the current suite of standards to ensure they are fit for the purpose and context they are being used in and outcomes align with industry expectations.
3. Continue to monitor the use of standards in the compliance or short scope and work with providers to implement solutions to ensure that learners awarded standards are assessed at the level of competence required to meet the standard outcomes and to keep them safe at work.
4. Work with other Workforce Development Councils where they have standards that are being used in the same context to ensure that we have consistency of approach for both industry and providers.

NEXT STEPS

The issues identified as part of this report will take time to change, however, there are actions that need to be implemented as a starting point. These are:

- ▶ Consult with WorkSafe, NZQA, CHASNZ, and other WDCs to discuss the outcomes of the project and look at how solutions may be implemented to ensure consistency of information and outcomes across the various sectors.
- ▶ Develop initial guidance documents for industry, providers, and secondary schools outlining the purpose, suitability, intended outcomes, and expected competency level for those standards that are currently being delivered.
- ▶ Gather a database from providers for all assessors who are currently assessing standards in this space. This will help to understand the status of quality assurance around assessment practice across the network.
- ▶ Call specific post-assessment moderation from those providers that have reported results for secondary schools for standards 3800, 15757, 23960, 23966, and 23962, seeking samples from students who have been awarded these results.
- ▶ Ensure the results of this project are considered for any current Waihangara Ara Rau qualification or standard reviews, or reviews that are being planned.
- ▶ Communicate the outcomes from the project across industry and provider networks.

BACKGROUND

As the standard-setting body for Construction and Infrastructure, Waihangara Ara Rau is responsible for standards that are being used as standalone courses across several of our industry sectors. They are generally defined as compliance training and cover topics such as Working at Heights, Elevated Work Platforms, Cranes, and for driver licence endorsements. There are also standards under the compliance umbrella that are the responsibility of other Workforce Development Councils.

The training related to these standards is undertaken by specialist providers, or training companies that are working under the umbrella of a registered provider. The standards may be offered standalone or combined into the one course.

Traditionally the courses are delivered over a 4hr to 16hr period depending on the provider, the course, and the expectation of industry. The demand from industry remains high but has dropped off in 2024 due to the challenges within the construction and infrastructure sectors.

The standards are some of the highest reported standards across our sectors and we have categorised these as high risk and high credit value standards. Generally, the assessment resources being used have passed the desktop post-assessment moderation process over several years. It is clear from discussions with industry that there is a lack of understanding around the purpose and level of competency required from workers who have been awarded these standards.

Note

- ▶ It needs to be made clear that the issues identified in this report only relate to standards that are being delivered as short courses. Where those same standards are integrated into a programme of learning, the same issues are not apparent due to the additional workplace experience that learners gain through undertaking these tasks on-job. This additional experience further reinforces their skills, knowledge and level of competency. The exception to this is the compliance units that are being used as a 'ticket' to get on site and the learner never has the opportunity to reinforce the knowledge gained from that short course because they are not exposed to those tasks as part of their role.

Why have we looked into this further?

Post-assessment moderation doesn't tell the full story, and the previous standard setting bodies had learners undertaking this training as part of a programme, and/or had contracts with the specialist providers and training companies to deliver the training for them. Potentially this was a conflict of interest and a reason not to address it further.

As an organisation we have looked beyond just moderation for these standards, and we have seen the same themes appearing. This suggests that there is an unresolved issue with the achievement of these standards.

We know:

- ▶ That the courses are being delivered between 4hrs and 16hrs depending on the course.
- ▶ The average credit value for these courses is 10 to 15 credits. Notional hours of 100 to 150, but being delivered and assessed in 4 to 16hrs.
- ▶ Learners range from having no prior experience, to having some industry experience, but this is not recognised as part of the process.
- ▶ The courses are getting shorter based on demand from industry who are looking for the shortest period away from work, and the lowest cost.
- ▶ Most courses are theory heavy with little time for learners to practice the skill and be practically assessed. Due to time pressures learners are being lead through theory assessments by various means.
- ▶ The competency level of learners who are awarded the standards does not meet the level of competency of the standard, or the expectations of industry.
- ▶ There is a lack of consistency of delivery and assessment across the provider network.
- ▶ English as a second language has been a barrier for those workers from overseas and the need to complete assessments in English, especially due to the short nature of the training and assessment.
- ▶ The providers feel pressured to deliver the training in shorter timeframes due to the commercial realities of meeting their clients' expectations.

WHAT have WE seen or HEARD?

We have gathered information using a number of sources and this has allowed us to see trends or themes that support our original assumptions. The cranes and scaffolding industry sectors also shared similar concerns regarding the use of standards being delivered through short courses, rather than through a programme.

1. Industry workshop

- ▶ There is a gap between the industry's expectation around understanding/competency and the requirements of the unit standards being used. Typically, this gap is 'experience'.
- ▶ The industry expects someone who has attended the course to have a basic level of understanding of the topic so they can be 'safe' on site. They do not expect them to be competent at the level of the current standards.
- ▶ Following the course, all workers would be subject to a high level of supervision. Some workers won't use the skills gained in the workplace, as the course is being used as a 'ticket' to get on site, written into SoPs.
- ▶ The larger employers will undertake additional training and experience in the workplace until the learner is deemed 'competent'.
- ▶ The industry wants more teaching and learning (practical reinforcement of the knowledge) on the courses, with less of a focus on assessment.
- ▶ The industry spoke of a framework of basic (current courses), intermediate, and advanced training. The intermediate/advanced should be undertaken in the workplace as they would be based on experience.
- ▶ There was still a misconception around the purpose of the WTR course between driving or

operation of machines. The outcome of the standards is around driving a machine on a road which leads to an endorsement on a driver's licence, not about being competent to operate a type of machinery.

2. Provider training site visits

- ▶ Post course many learners would not be able to work safely back on the job, without supervision.
- ▶ Courses tend to include no practical training; rather training is focussed on theory. Assessment activities have minimal practical components, they are focussed on theory tasks.
- ▶ There are two types of learners: those with experience, and those with no experience.
- ▶ The theory component of assessments is challenging for learners, even more so ESOL learners. E.g. High level of technical language used, they are in English.
- ▶ Training and assessment are simultaneous, with assessor coaching and learners sharing answers evident.
- ▶ Venues are of a good standard and the training rooms fit for purpose. Practical training/assessment areas well set up with all the safety equipment and zones required to carry out safe assessment. All equipment/machinery and structures are compliant.
- ▶ Inconsistent use of workplace evidence for verification of a learner's prior experience.

3. Pre-assessment Moderation

- ▶ There were many resubmissions of assessment resources required, with some providers needing support to bring assessment resources and assessor guidance to an acceptable level.
- ▶ Issues included:
 - ▶ Outcome requirements not fully met
 - ▶ Unclear assessment instructions
 - ▶ Incorrect or incomplete model answers
 - ▶ Incomplete standard guidance information
 - ▶ Supporting documentation not included
 - ▶ Assessment tasks not fully aligned with the unit standard guidance information.

4. Post-assessment Moderation

- ▶ Theory answers incomplete, lacking in detail or borderline where a more in-depth answer is required.
- ▶ Assessor marking often deviated from model answers and lacked alignment with assessor guides and judgment statements.
- ▶ Assessor observations and supporting documents incomplete or lacking sufficient detail to confirm whether the tasks were completed and by whom.
- ▶ Photos used as evidence were often not labelled.
- ▶ Insufficient or no comments documented by the assessor to validate assessment judgements.
- ▶ Assessment resources not to national standard and required pre-assessment submission.

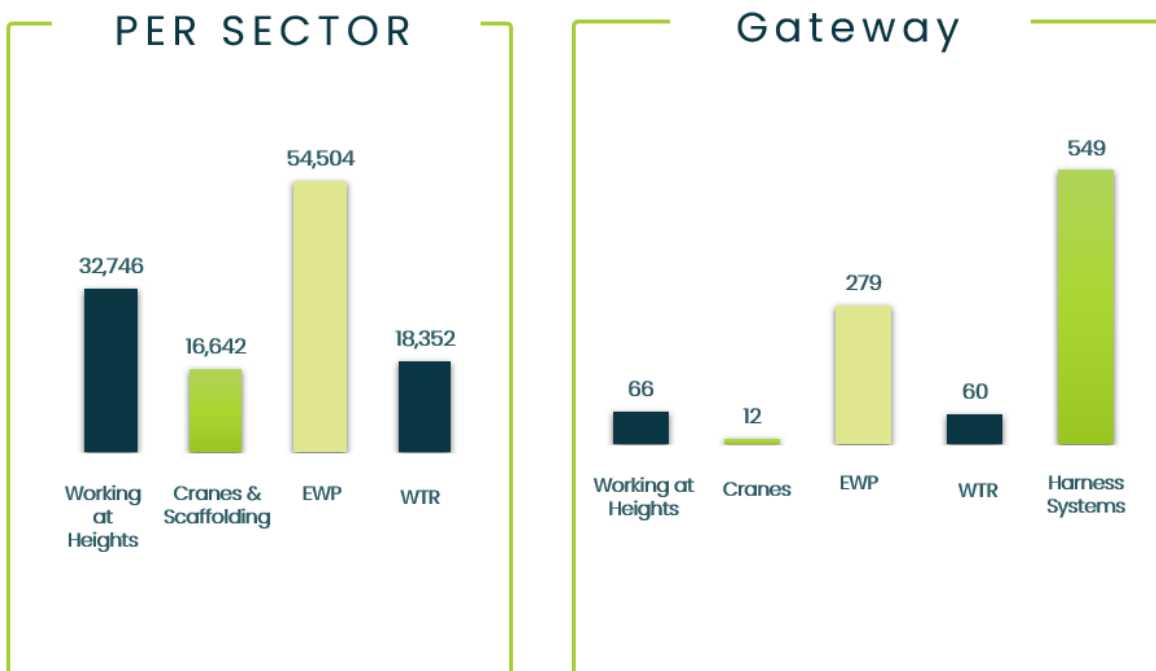
- ▶ Where internal moderation was conducted, it did not fully identify issues.

5. Secondary School Delivery

- ▶ It was found that these standards were being delivered to students across the secondary school network.
- ▶ These students had no industry experience or were unlikely to enter an industry to gain experience in these areas.
- ▶ The students were undertaking the same short courses training as industry learners.
- ▶ Based on the timing of the results being reported you could argue that these courses are being used to 'gather credits' for achieving NCEA. The majority of results were reported in Quarter 4-2023.
- ▶ Although the industry supports the use of industry standards to help students in Gateway be exposed to an industry sector, they question the suitability of the compliance-based standards being used in the general secondary school setting.

School Data

The graph on the left shows the total number of results reported in 2023 for standards covered by the project. The graph on the right shows the specific results reported by providers who have assessed these units for students in the secondary school sector.



CONCLUSIONS

There were consistent themes that came through all of the discovery activities, and these were confirmed during the provider and industry workshops. This has led to courses being delivered in shorter periods of time and or the intended purpose of each standard to be forgotten. It is clear that the current situation has happen over a period of time and there have been a number of drivers.

The industry expectation of why they are sending staff to these training courses doesn't match the required outcomes of the various standards. This is resulting in learners either needing to be retrained in the workplace, or never being in a position to put the skills and knowledge they have gained into action. For some workplaces the courses are being used as a 'ticket' to get into onto a jobsite, which is not the intended purpose.

Due to the way the courses are structured, and the perceived industry expectation, the providers are struggling to get through all of the content required in the short timeframes due to the heavy theory content of the courses. Learners with English as a second language, or with learning difficulties, are unable to get the additional support needed to ensure they understand the subject, especially considering the technical jargon used in the industry.

The project has shown that the current training being delivered is of value to the industry and largely is of high quality. However, it is not meeting the expectations of the industry with regards to the level of competency required. It is also not meeting the level of competency required for the majority of the standards being assessed against.

Something needs to change due to the high-risk nature of the standards and the industry. It is going to take time to work through and implement best practice solutions.

RECOMMENDATIONS

The recommendations from this project are categorised into two separate areas due to the specific nature of the recommendations.

Industry Compliance Training and Short Courses

These recommendations relate to the delivery of compliance and standards to learners who are working in, or seeking opportunities in, industry. The current delivery and assessment of these standards is through the use of short courses and assessment is undertaken in a simulated environment.

Note These recommendations may not be applied where the standards are being taught as part of a 'programme' where the learner is exposed to tasks relating to the skills and knowledge aligned to each standard and will have the opportunity over time to gain more experience.

1. A Guidance Document is developed for industry and providers outlining the purpose, suitability, intended outcomes, and expected competency level for those standards that are

currently being delivered via short courses. The guidance needs to include the expected sufficiency of evidence and the length of the training to ensure there is teaching, the opportunity to reinforce knowledge through practical application, and assessment through the repeatability of demonstrating skills and knowledge aligned to the standard.

Example

US3800 – *Use a radio pendant controlled gantry crane to lift and place regular loads.* This is an industry based standard and is intended for those people who are working with cranes on a regular basis. Assessment for this standard must be carried out in a crane workplace or other non-simulated environment. Two different assessor observed lifts are required. The expectation is that learners being assessed can show evidence of using cranes on a regular basis within their workplace environment.

US15757 – *Use, install and disestablish temporary proprietary height safety systems when working at height.* This is an industry standard and is intended for those people that are working at heights in a workplace setting. Although the WorkSafe advice doesn't reflect the wording of the current standard, it has the same meaning. This advice states that this standard is for "those workers involved in planning, installing, operating fall arrest systems and supervising staff". The expectation is that learners being assessed against this standard are in the workplace and are working at heights on a regular basis with limited supervision.

2. Review the current suite of standards to ensure they are fit for the purpose and context they are being used in and that outcomes align with industry expectations. This should consider the industry basic, intermediate, and advanced levels of competency. Any review would need to consider how some of these standards are used in programmes related to a qualification and the appropriate level of competence that a learner needs to demonstrate.

Example for working at heights:

- ▶ **Basic:** An introduction to the subject with the outcome of ensuring that the learner can be safe when undertaking tasks or working around others who are working from height. US23229 – *Use safety harness system when working at height*, maybe an appropriate standard at this level with some revision. The current short course delivery could be considered appropriate for this standard when delivered alone.
- ▶ **Intermediate:** Where a worker is undertaking tasks in the workplace, under supervision, and has the opportunity to demonstrate the appropriate level of competency in the workplace environment. A new standard may need to be developed to meet this outcome.
- ▶ **Advanced:** Where a worker is undertaking tasks in the workplace unsupervised and maybe responsible for others in their team. They would be able to demonstrate competency using evidence from the workplace. US15757 – *Use, install and disestablish temporary proprietary height safety systems when working at height*, maybe an appropriate standard at this level with some revision and potential movement to Level 4.

3. Continue to monitor the use of standards in the compliance or short scope and work with providers to implement solutions to ensure that learners awarded standards are assessed at the level of competence required to meet the standard outcomes and to keep them safe at work. Visits by Waihangara Ara Rau will be an important aspect of this recommendation to ensure that agreed solutions are being implemented.
4. Work with other Workforce Development Councils where they have standards that are being used in the same context to ensure that we have consistency of an approach for both industry and providers. An example is the Confined Space Safety area where Toitū te Waiora are the SSB.

Secondary School Delivery

These recommendations relate to the delivery of compliance and industry standards in the secondary school system. The recommendations exclude students who are engaged in Gateway or Trades Academy programmes who are exposed to work experience in a related industry sector.

Note The promotion of these courses as 'Gateway', by providers, doesn't always reflect that they are for Gateway students or that they are being funded through Gateway.

1. A Guidance Document is developed for secondary schools and providers outlining the purpose, suitability, intended outcomes, and expected competency level for those standards that are currently being delivered in the Secondary School sector. The guidance needs to include the expected sufficiency of evidence and the length of the training to ensure there is teaching, the opportunity to reinforce knowledge through practical application, and assessment through the repeatability of demonstrating skills and knowledge aligned to the standard.

Note The standards being delivered to secondary school students are industry based standards where the expectation is that they are delivered and assessed in the workplace to ensure there is the opportunity to gain experience before being assessed. This can not be achieved where the standards are delivered through the various short courses.

Example

US3800 – *Use a radio pendant controlled gantry crane to lift and place regular loads.* This is an industry based standard and is intended for those people who are working with cranes on a regular basis. Assessment for this standard must be carried out in a crane workplace or other non-simulated environment. Two different assessor observed lifts are required. Although the usage of this standard was low, we need to question the use of this standard for secondary school students, even if they are in a gateway programme.

US15757 – *Use, install and disestablish temporary proprietary height safety systems when working at height.* This is an industry standard and is intended for those people that are working at heights in a workplace setting under limited supervision. Although the WorkSafe advice doesn't reflect the wording of the current standard, it has the same meaning. This advice states that this standard is for "those workers involved in planning, installing,

operating fall arrest systems and supervising staff". The usage of this standard was reasonably high, and we question the suitability of this standard for secondary school students who are not working at heights on a regular basis in an industry setting.

The exception to the above is where appropriate standards are being delivered as part of the Gateway programme where students do gain workplace experience. However, this experience needs to ensure that the student is exposed to the skills required to be deemed 'competent' at the same level as someone working in industry.

2. Call specific post-assessment moderation from those providers that have reported results for secondary schools for standards 3800, 15757, 23960, 23966, and 23962, seeking samples from students who have been awarded these results. The purpose is to ensure that the awarding of the results is justified, and that workplace evidence has been used as the basis of that assessment.
3. Continue to monitor the use of these standards within the secondary school system, and work with providers to ensure that the appropriate standards are being used in this environment.