



# Changes to High Risk Work Assessor Licensing Requirements Summary of Feedback

The following table provides a summary of the submissions received in response to changes to the requirements for obtaining or renewing a high risk work assessor accreditation.

An email notifying assessors and RTO's of these changes was issued on 8 October 2024.

A total of 65 submissions were received.

In the following table a reference to 'the regulations' refers to the Western Australian Work Health and Safety (General) Regulations 2022.

Submission	Response
<p><b>Removal of encompassment</b></p> <p>Several submissions were received requesting clarification of the removal of encompassment for accreditation holder. One submission was made opposing this change.</p>	<p><b>No change</b></p> <p>The removal of encompassment for accredited assessors is required to bring WA into compliance with the regulations and with all other states and territories.</p> <p>This change will have no impact on existing assessors who will have the 'encompassed' classes added to their accreditations before this change is made.</p>
<p><b>Training qualifications are too limited</b></p> <p>Seven submissions raised a concern that the requirements for assessors to complete:</p> <ol style="list-style-type: none"> <li>1. TAE40122 or TAE40116 Certificate IV in Training and Assessment (or an equivalent successor), or</li> <li>2. TAE40110 or TAA40104 Certificate IV in Training and Assessment and evidence of completing additional units TAEASS502 and TAELLN411.</li> </ol> <p>Is too limited and does not allow for assessors who hold a higher qualification such as a teaching degree.</p>	<p><b>Change made</b></p> <p>The regulations (regulation 118(2A)) require that an assessor must be suitably <b>qualified</b> to provide the competency assessment. To ensure that applicant meet this requirement they are required to complete an appropriate qualification.</p> <p>The TAE40122 and TAE40116 Certificate IV courses are considered a base level of qualification.</p> <p>The licensing requirements have been updated to show that higher level of qualification, such as diplomas and bachelor degrees, in a suitable discipline will also be accepted.</p>
<p><b>Training qualifications are too broad</b></p> <p>One submission raised a concern that accepting TAE40110 or TAA40104 Certificate IV in Training and Assessment and evidence of completing additional units TAEASS502 and TAELLN411, was not appropriate. The concern raised was that these qualifications were outdated and no longer reflected current training and assessment standards.</p>	<p><b>Change made</b></p> <p>TAE40110 and TAA40104 were superseded in may 2010 and 2004 respectively.</p> <p>The licensing requirements have been updated to show that these courses will not be accepted for new applications for accreditation.</p> <p>Applicants who have these accreditations and object to this can make a submission for consideration when applying.</p>
<p><b>TAE40122 is too hard</b></p> <p>One submission raised a concern that the TAE40122 certification is significantly more difficult to achieve and could result in difficulties recruiting assessors.</p>	<p><b>No change</b></p> <p>The Department actively participates with other regulators and the Safe Work Australia in monitoring issues like this. There is no current indication of an issue caused by this course. If issues are identified in the future action will be taken.</p>
<p><b>Certificate IV in Work Health and Safety should be required.</b></p> <p>One submission suggested that all assessors should be required to complete this additional qualification to be eligible for accreditation. The proposal stated that given the work being assessed was recognised as high risk it was appropriate for assessor to be suitable and formally qualified in work health and safety.</p>	<p><b>To be considered</b></p> <p>Unlike other states and territories Western Australia does not currently require applicants for accreditation to undertake an assessment. Assessment in other jurisdictions include work health and safety content.</p> <p>Requiring new applicants for accreditation to have completed a qualification in Work Health and Safety will be considered, subject to further consultation with stakeholders.</p>

Submission	Response
<p><b>Objections to the requirement for assessments for renewal</b></p> <p>57 submissions raised concerns about the requirement for accreditation holders to conduct nine assessments to be eligible for renewal. The concerns raised included:</p> <ul style="list-style-type: none"> <li>• Nine assessments was unachievable for many assessors and in particular in some classes of accreditation.</li> <li>• The alternative or providing evidence of work experience is too onerous.</li> <li>• If assessments are used as a measure of competency, then the number should be counted as one per candidate not one per group, and assessments in encompassed classes should also be accepted.</li> <li>• The requirement to provide evidence of competency duplicates the requirements placed on an RTO by ASQA and TAC.</li> <li>• It is unclear if interstate assessments can be accepted.</li> <li>• Accepting only assessments only gives an indication of competency to assess, not competency in that class of high risk work.</li> <li>• Many assessors conduct mainly or solely VOC's and do not conduct assessments.</li> </ul>	<p><b>Change made</b></p> <p>The use of assessments of a measure to assess maintenance of experience has been removed. Instead the assessors declaration on the renewal application form has been updated to required additional information detailing the activities undertaken to maintain experience over the term of the accreditation. Activities can include training, assessing, VOC's, and working in the class of high risk work. Refer to the renewal application form for further information.</p>
<p><b>Limited number of classes per application</b></p> <p>Nine submissions opposed the new limit of three classes per accreditation application. Reasons for opposing this included concerns that it was motivated by revenue raising and would not improve processing of applications.</p> <p>One submission suggested that the fee for adding classes should be reduced to reflect this change.</p>	<p><b>No change</b></p> <p>The removal of encompassment from accreditations is likely to cause an increase in the number of applications to add a class to a new or existing accreditation.</p> <p>Applications with multiple classes are difficult for licensing officers to process because often the information provided by applicants is difficult to make sense of. This results in applications with more classes taking longer to process which delays processing of other applications and inflates the cost of processing.</p> <p>Limiting applications to three classes will assist officers to process applications more quickly and will also act as an incentive for assessors to only apply for classes of accreditation they intend to use. This will also assist in maintaining the lowest possible application fees.</p> <p>It is important to note that the limit of three classes does not apply to applications to renew an existing accreditation.</p>

Submission	Response
<p><b>New experience requirements are too low</b></p> <p>13 submissions raised concerns that the new experience requirements for obtaining a new assessor accreditation were too low.</p> <p>The submissions indicated that one year of experience was suitable for less complicated classes such as forklift (LF), but that classes such as crane classes should require a larger amount of experience.</p>	<p><b>No change</b></p> <p>After considering this feedback no change will be made to the proposed experience requirements. The volume of experience required is consistent with other jurisdictions.</p> <p>It was also noted that RTO's are required to validate the competency of trainers and assessors.</p>
<p><b>HRWL trainer should be different to the assessor</b></p> <p>One submission advocated that high risk work assessor should not also act as the trainer for the associated VET course.</p>	<p><b>No change</b></p> <p>The Department is not considering investigating this proposal at this stage.</p>