General Construction Induction (White card) Training – Guidance for RTO proposals for connected real-time delivery

# Background

To be able to carry out construction work, a person must complete an introductory safety training course called ‘general construction induction training’. This is also commonly known as ‘white card’ training. The term ‘training’ includes the necessary assessment.

Assessment requirements for white card training are defined in *CPCCWHS1001 Prepare to work safely in the construction industry*. CPCCWHS1001 requires that assessment of performance be done by direct observation of the learner by an assessor, either by an assessor observing the learning physically and/or by an assessor observing the learner via audio and visual media in real time.

The Commonwealth, state and territory WHS Regulators set their own policies as to how Registered Training Organisations (RTOs) are engaged and are to deliver white card training in their own jurisdiction. Although the model WHS laws do not specify how training must be delivered, in practice, most WHS Regulators require white card training be delivered ‘face-to-face’.

These policies are in addition to the assessment requirements for CPCCWHS1001 but are required if a learner wants to apply for a white card.

The Australian Skills Quality Authority (ASQA) is the national regulator for vocational education and training providers, with responsibility for ensuring that the nationally approved standards, the Standards for Registered Training Organisations (RTOs) 2015, are met. In developing this document, ASQA has provided advice on the regulatory obligations RTOs must satisfy in relation to the Standards for RTOs 2015.

## COVID -19

The COVID-19 pandemic is significantly impacting the ability of RTOs to deliver face-to-face training. In recognition of this, Commonwealth, state and territory WHS regulators have worked with Safe Work Australia to develop national parameters to enable RTOs to deliver white card training via “Connected real-time delivery” along with other delivery or administrative supporting arrangements (e.g. provision of digital or hard copy training materials).

Note: The option for RTOs to deliver white card training via connected real-time delivery will only apply during the COVID-19 pandemic.

## What is “Connected real-time delivery”?

* Live video streaming/conferencing using platforms such as Zoom, Skype, Teams
* Involves real-time interaction between learner and trainer
* Active participation of learners and trainers
* Verification of learner Evidence of Identity (EOI) can be done one-on-one (or face-to-face) via video conference
* Direct observation or verbal assessment can be undertaken for all assessment components.

## Are there limitations on delivery of connected real-time white card training?

Training must involve real-time interactions between the learner and trainer and must include one-on-one (or face-to-face) training and assessment interaction. The training must not:

* be delivered entirely via an online learning management system through portals
* include a pre-training requirement
* include self-paced learning
* include pre-recorded trainer videos or teaching course content (Note: this does not include educational videos showing construction sites).

In Western Australia (WA), RTOs are required to deliver the white card training consistent with the Standards for Registered Training Organisation 2015 (Standards). During the COVID-19 pandemic, providing RTOs deliver White Card training to candidates located in WA at the time of assessment do so in accordance with the Standards, there is no need to apply to WorkSafe in relation to connected real-time delivery.

## Determining whether an RTO is authorised to deliver connected real-time white card training

WHS Regulators have agreed to allow RTOs that are already approved to deliver white card training to apply to deliver this training via connected real-time delivery. All other RTOs will need to submit a full new application. RTO applications for connected delivery must specify how an RTO will meet the requirements set out in this guidance.

RTOs must apply to their WHS Regulator (except in WA) and if approved to provide connected delivery services, this approval will only apply during the COVID-19 pandemic.

To enable national consistency, WHS Regulators require that any white card training delivered via connected real-time delivery must:

1. Have a minimum training duration of six (6) hours (i.e. not including course administration and learner verification activities)
2. Be completed within two (2) weeks, and
3. Be delivered to no more than ten (10) learners in any one learning session (**Note:** regulators may set a further reduced maximum number of students (e.g. six) for initial delivery).

**Note:** There is no requirement for an RTO to deliver training in one (1) day and a cumulative delivery method is acceptable (e.g. two (2) hours per day across three (3) days).

## What must an RTO’s submission to deliver connected real-time white card training address?

### Training Delivery

Specify the training and assessment strategy and planned delivery of the training course, including:

* Connected real-time delivery method and systems (including delivery platform, technical requirements, and any supporting arrangements)
* Training plan
* Course content, including any amendments to the standard course requirements for the connected real-time delivery method
* Course run sheet (sessions, durations and content)
* Course notes
* Trainers
* Trainer notes, ND
* Links to any educational videos or other digital support materials to be used during the training program.

### Compliance with the Unit of Competency

Provide evidence that the proposed connected real-time delivery is compliant with the national unit of competency [CPCCWHS1001](https://training.gov.au/Training/Details/CPCCWHS1001).

### Learner Welfare

Specify the learner welfare provisions, including to determine that the planned delivery method is suitable for learners and that the program provides a suitable environment, including for breaks and physical movement.

### Learner Identity Verification

Specify how learners’ identity will be verified and their EOI documents confirmed, including:

* proposed method/s for receipt of identity documents from the learner
* proposed method to verify that the identity documents belong to the learner, and
* how and when would the identity verification process be conducted for each learner, including how the RTO will protect the learners’ privacy.

**Note**: Privacy issues may arise if identity verification is conducted over a public communication medium.

### Language Literacy and Numeracy (LLN) and Special Needs

Specify how learners’ LLN competency will be assessed and any special needs identified/assessed and how these will be provided for prior to confirmation of enrolment and acceptance for training.

Specify how the proposed delivery method and system can/will accommodate any identified LLN issues and special needs.

### Learning Environment and Feedback

Specify how the RTO will determine that each learner has a suitable learning environment and the resources needed to facilitate a positive learning outcome, including to specify the minimum learner technical requirements to enrol, effectively participate and successfully complete the training.

Specify how the learner will be able to evaluate and provide feedback on the training and how this will be recorded/managed to provide for training delivery improvement.

### Personal Protective Equipment (PPE)

Specify how the learner is to be provided with/obtain the correct PPE required to complete the training, including:

* eye protection
* hearing protection
* head protection (hard hat), and
* high visibility retro reflective vest.

Specify how a learner will be assessed when they demonstrate the correct fitting of the PPE.

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| Note: RTO submissions proposing virtual and/or simulated demonstrations of correct PPE fitting will not be accepted by a WHS Regulator. Examples of demonstrations that would not be acceptable include:   * asking the learner to show how/where PPE should be fitted via use of a computer program * asking the learner to simulate how PPE is to be fitted without the learner being in possession of the PPE, or * asking the learner to direct the trainer to fit PPE. |

### Supporting Learning Resources

If additional learning resources, such as a workbook or learner notes, will be used to support learning outcomes, specify how learners will be provided, receive, and complete the resources (e.g. hard copy by mail, complete and return mail; or digital via email; or a Learning Management System).

Note: Where any digital learning resources are provided, these must be able to be completed electronically (e.g. areas where information is to be inserted are to be fillable) and must not require printing by the learner.

### Learner Technical Support

Specify the technical support to be provided and available to learners so that technical issues can be identified, logged and resolved in a timely fashion so as not to negatively impact the learners’ experience.

This should include:

* the method of technical support (e.g. online or phone support), and
* the technical support provider (e.g. the RTO or a nominated third party)
  + **Note**: if a third party is used, how the learners’ privacy will be protected.

### Technical Verification of Learner Presence in Training

Specify how the training delivery system will verify and record that a learner is present during and for the duration of the training and how any instances of learner non-presence will be identified and managed.

This may include:

* System learner connection monitoring and logging in real-time
* System alerts to the trainer of individual learner disconnections/dropouts so that these can be resolved in a timely fashion
* Establishing a benchmark of minimum learner presence (e.g. 90 per cent) that must be met to successfully complete the training course, and
* Providing ‘catch-up’ opportunities for any impacted learners.

### Successful Training Certification

Specify how and when the learner will be provided certification on successful completion.

### Regulator Audit and Verification Provisions

Specify how the delivery method and systems will allow/provide for regulator audit and verification of training delivery, including:

* Training record keeping and management (including the completion and collection of any mandatory forms)
* Digital data capture and provision, as may be required, for audit and verification purposes, and
* Regulator observation of or participation in any training course delivered.

### Evaluation

Specify how course evaluation will be conducted upon completion of the course.