



WORK-BASED TRAINING POLICY

POLICY TITLE: WORK-BASED TRAINING POLICY
POLICY NUMBER: WIP0910 - 010
RESPONSIBILITY: TRAINING MANAGER

1. Introduction

This policy (and its procedures) relate to international WAIFS' students undertaking work-based training as part of their approved study programme.

The Department of Education states in its Standards for RTO's - Systems for quality training and assessment, 1.6:

- a) *[WAIFS] must have and comply with, a written agreement with each organisation that provides training and/or assessment on behalf of [WAIFS].*
- b) *the agreement must specify how each party to the agreement will discharge its responsibilities for ensuring the quality of the training and/or assessment conducted under the agreement*
- c) *[WAIFS] must maintain a register of all agreements.*

AQF, Standard 1, element 1.2 requires:

The RTO consults with relevant industry personnel to document and implement a plan for learning and assessment for each Training Package qualification and accredited course it offers.

And from the AQTF 2007's User's Guide to the Essential Standards for Registration:

"Access and Equity

An RTO needs to ensure that its practices are as inclusive as possible and do not unreasonably prevent any clients from accessing its services.

Basing strategies on data

When the training and assessment strategies are based on data gained from effective consultation with enterprise, training and assessment are more likely to meet their requirements.

Data relevant to training and assessment strategies could include:

- Regulations or laws governing the industry and/ or standard operating procedures, equipment and machinery used at the enterprise level
- Information about the work environment (for example shifts or seasonal changes to schedules) that will affect delivery and assessment
- Preferences about the way in which a qualification is delivered
- Characteristics of the target group that need to be accommodated in training and assessment.

You could offer industry and enterprises the opportunity to collaborate in making joint decisions about training and assessment strategies, as well as assisting in the review of strategies and training programs by providing feedback and participating in assessment validation."

2. Establishing work-based training placements

WAIFS will ensure that staff administering work-based training have all the information they require to ensure placements are successful.

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WAIFS will determine the suitability of all host employers. The determinations will be based on:

- Ability for students to achieve learning outcomes.
- Availability of induction and support for the student.
- Occupational health and safety.
- Equal opportunity.
- Training experience of host employer.

The majority of these areas can be assessed during discussion with the host employer. The trainer may need to talk to more than one employee to assess all of the information. Although this should not be an overly intrusive process, WAIFS trainers will need to satisfy themselves in these areas. For OH&S, there is a checklist which the potential host employers (and established host employers) are required to complete and which is available on the WAIFS shared drive.

3. Work-based Training Agreement

- WAIFS has a 3-way work-based training agreement relating to work-based training:
 1. An agreement between the student, host employer and WAIFS which details the respective responsibilities of each party in relation to the work-based training placement. *The agreement must be signed by all parties prior to commencement of any work-based training placement.* A file of agreements is maintained by each department.

4. Consultation with Host Employers

- WAIFS Training Manager and Trainers will work with approved host employers to ensure continuous improvement of the course programmes which are offered and to ensure that they continue to meet the needs of all key stakeholders, including students and employers (as representatives of current industry requirements).
- WAIFS should encourage all new (and continuing) host organisations to have input into the training and assessment strategies of WAIFS' accredited courses. This does not mean that all suggestions have to be followed/ incorporated but trainers should always remember that the relevancy and currency of how WAIFS teaches and assesses its courses are how the ongoing quality of graduates is maintained.
- Enabling input can be achieved in a number of ways including:
 - (i) When the outcomes, training requirements and assessment of the work-based training placement are discussed with a host employer, they can identify easily if anything has changed in how things are done in industry since the last placement occurred to ensure that current placements are relevant (pre placement training can also then be updated to reflect current practices);
 - (ii) During and post-placement feedback.

Any amendments which are recommended for any WAIFS course should be listed in the “continuous improvement” register. Where amendments are made to the course, this should be details in the CI register.

5. Student Misbehaviour/ inadequate course progress etc.

On occasion, a student may be unable to participate in/complete work-based training placements. This may be due to:

- (i) Illness and/or compassionate and compelling circumstances;
- (ii) Inadequate course progress;
- (iii) Student misbehaviour;
- (iv) Not achieving at least 80% attendance in their course. (Note: Although WAIFS does not report to DIBP on course attendance, it is considered critical that students in health-related courses have at least 80% attendance in their course to ensure they are fully prepared for a work placement and are considered able to commit to regular work placement attendance).

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(i) *Illness and/or compassionate and compelling circumstances*

If a student is unable to attend/complete work-based training due to illness or compassionate or compelling circumstances, trainers will need to refer to the WAIFS policies covering:

- a) Academic progress;
- b) Mandatory intervention strategy;
- c) Completion within expected duration;
- d) Deferring/suspending/cancelling enrolment.
- e) And also work with the host employer and student to try and arrange alternative dates for completion of work-based training (e.g. perhaps in non-compulsory study periods so that it does not impact on completed within expected duration).

(ii) *Inadequate course progress*

If a student is assessed as not making adequate course progress either before or during work-based training placement, and this impacts on their ability to attend/complete the scheduled work-based training hours, the WAIFS' trainer must refer to the WAIFS' policies covering:

- a) Academic progress;
- b) Mandatory intervention strategy;
- c) Completion within expected duration.

WAIFS monitors course progress at specific intervals (see academic progress policy) and also on an ongoing basis if there is reason for concern (e.g. erratic attendance). If this is the second consecutive period in which a student is assessed as making inadequate course progress, the WAIFS trainer (and Training Manager) will need to refer to the WAIFS policies covering:

- a) Academic progress;
- b) Deferring/suspending/cancelling enrolment.

(iii) *Student Misbehaviour*

Students are made aware of the following pre-enrolment in the detailed training and assessment strategies for their particular course (s):

WAIFS has a responsibility to protect members of the public (and students themselves) from being harmed by students taking part in work-based training. If there is evidence that a student's skills or behaviour could present a risk to themselves or other people in the workplace, they may not be allowed to participate in a work-based training placement, at least for a period of time.

Students should be aware that if they are not able to complete/commence their work-based training and this impacts on a student's ability to make adequate course progress, WAIFS will implement an intervention strategy. This may or may not impact on the student's ability to complete within the expected duration of their course (depending on the strategy adopted and the timing of any necessary intervention). This may affect a student's visa. (See WAIFS' policies covering Academic Progress, Mandatory Intervention Strategy and Completion within Expected Duration available at www.waifs.wa.edu.au/policies.)

Students who are assessed as presenting a significant risk to themselves or others before or during work placement may be prevented from undertaking or continuing further work placement. This may mean that a student will not be able to complete their course and may affect their student visa.

In accordance with Standard 13 of the National Code 2007, WAIFS can suspend or cancel a student's enrolment for misbehaviour by the student. If WAIFS initiates suspension of a student's enrolment the student has 20 working days to access WAIFS' internal complaints and appeals process, unless extenuating circumstances relating to the welfare of the student apply. If the student accesses WAIFS' internal complaints and appeals process, suspension or cancellation of

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the student’s enrolment under this standard cannot take effect until the internal process is completed, unless extenuating circumstances relating to the welfare of the student apply. WAIFS does not have to wait for the outcome of an external appeal before notifying DEEWR of the change to the student’s enrolment status.

‘Extenuating circumstances’ relating to the welfare of the student may include, but are not limited to the following. The student:

- Is missing;
- Has medical concerns, severe depression or psychological issues which lead the provider to fear for the student’s wellbeing;
- Has engaged or threatens to engage in behaviour that is reasonably believed to endanger the student or others; or
- Is at risk of committing a criminal offence.

Any claim of extenuating circumstances will need to be supported by appropriate evidence.

(See WAIFS’ policy relating to suspending/deferring or cancelling enrolment for further information.)’

Where the student’s misbehaviour is not considered a ‘significant risk’ WAIFS trainers should work with the student and host employer to try and find a way that the training can be completed at a future date. It may be that if the student makes changes to their current behaviours/receives additional training at WAIFS they could attend the host employer/an alternative host employer at a future date. Trainers must be aware of the requirements to consider course progress and completion within expected duration of study in all of these cases (see applicable WAIFS policies).

Where students are considered to present a ‘significant risk’, the trainer should refer to the requirements of the WAIFS policy covering suspension/deferral/cancellation.

(iv) Non-attendance at a work placement

If a student does not attend each scheduled day of their work placement and does not have a valid medical certificate supporting the absence, there is a risk that the placement will cancel the student work-based placement. WAIFS and the students MUST be aware that work placements are in actual businesses which are run for profit, need reliable staff and happy customers. If a student’s work placement is cancelled by a work based placement employer for unexplained absence from the host employer, WAIFS reserves the right to not offer an additional work placement to the student. Students should be aware that inability to successfully complete a work placement will effect their ability to complete their course and may effect their student visa.

6. Preparing the host employer

The following should be discussed with the host employer:

- *There is a detailed list of WAIFS’ responsibilities to the employer and vice-versa in the 3-way work placement agreement record and WAIFS trainers should ensure all issues detailed therein are covered in relation to the host employer.*

Additional detail is provided below:

- obligations under WHS, equal opportunity and other relevant workplace legislation;
- suitable workplace supervision;
- emergency and accident procedures;
- proposed training program for student and the expectations for supervision and learning – host employer should be able to give input into “how” the outcome is taught/re-enforced/assessed (trainers can consider setting separate sessions for this to be covered in more detail if the host employer is of high quality and is offering valuable contribution in these learning areas which will be beneficial);
- the skills to be learned, enhanced or demonstrated during the placement are clearly specified and agreed to in writing;
- ESOS Framework and National Code 2007;

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- Assessment during work-based training – dates/times/how assessment will occur etc.;
- WAIFS trainer attendance for ongoing review of work-based training placement and assessment/s;
- insurance coverage and arrangements –
WAIFS has arranged for students to be insured during work placements and covered for any accident to themselves or others. Copies of the relevant extracts of the insurance policy (organised through Sinclair Insurance) should be provided to employers as reassurance in this area;
- capacity to accommodate student's special needs (including disability, cultural and/or specific needs), if required;
- When and how feedback will be given – give the host employer the feedback form at this stage so that they are aware from the outset of the feedback you are looking for and in what areas. The context of the feedback should also be clear e.g. positive environment for feedback on how WAIFS has done and could do better/was good etc., and;
- Police check, Working With Children Check (WWCC), immunisation requirements and any other special requirements, (if required).
Information on the WWCC can be obtained from:
<http://www.checkwwc.wa.gov.au/checkwwc/About+WWC+Check/Publications+and+Forms/Forms.htm>

3. Preparing the student

- There is a detailed list of WAIFS' responsibilities in the 3-way work placement agreement record and WAIFS trainers should ensure all issues detailed therein are covered in relation to the student.
- There is a detailed list of student responsibilities in the 3-way work placement agreement record and WAIFS trainers should ensure that the student understands all of these items before commencing work-based training placement.

4. Focusing on the needs of students

- WAIFS is required to provide reasonable adjustment for students with a disability to complete work-based training placements.
- In order for adjustments to be made, the student must formally identify himself or herself as having a disability.
- WAIFS cannot make adjustments, or inform the host employer about the student's disability, without the student's permission.
- Where a student identifies himself or herself as having a disability and requests assistance the designated trainer coordinating the work-based training placement and Training Manager, if appropriate, should:
 - meet to ensure an accurate assessment of the requirements of the placement and the student's ability are made;
 - determine how the learning outcomes of the placement may be achieved while accommodating the needs of the student; and
 - discuss the information that will be provided to the host employer about the student and their requirements and who should provide it (as long as the student gives permission for information to be disclosed to the Host Employer).
- WAIFS trainers also needs to consider the specific requirements of all students in order to comply with access and equity requirements e.g. female students, students with specific cultural requirements.

5. Police checks/Working with Children Checks/Immunisations

- Where there is a requirement for students to undergo a Police Check/ WWCC/ Immunisations/ provide their first aid certificate (or any other specific requirement) prior to placement this requirement must be clearly communicated to all prospective students.

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- Students will be responsible for ensuring that all requirements are met prior to commencement of their work-based training placement (although WAIFS student administration staff will assist them to complete the forms etc. if they are uncertain on what to do).
- Students will pay for the cost of the Police Checks/WWCC/immunisations personally. (These items must always be identified separately on course information for students and clearly stated as a cost in addition to the tuition fee for the course.)
- Students who have not obtained all stated requirements by the commencement of the work-based training placement will not be able to commence work-based training. Students should be informed of the importance of getting all of the requirements and the potential impact on making satisfactory course progress and completing within the expected duration of the course (see appropriate WAIFS policies for further information).
- The student will be required to show the originals of any checks/ immunisations/ other requirements to the host employer.

6. Conducting assessment

Assessing skills taught in the course is the responsibility of WAIFS. The skills to be learned, enhanced or demonstrated (and the training required to achieve them) should be clearly explained to the student and the workplace supervisor before the placement begins and put in writing.

The workplace supervisor may provide evidence towards an assessment judgement, but the WAIFS' nominated trainer is responsible for the final assessment decision.

Trainers should always be mindful of the following:

Challenge

Under AQF Standard 9, RTOs are required to develop assessment strategies in consultation with enterprises and industry at a local level. However, RTOs are also required to ensure that they follow the requirements of Training Packages, which have been developed with a national focus. Sometimes local industry input runs contrary to the requirements of a Training Package, leaving RTOs in a difficult position.

The challenge for trainers/assessors is to ensure that both requirements are met.

Discussion

We are encouraged to consult with industry on a number of AQF criteria. Standard 1.9 requires the RTO to 'collect and analyse stakeholder and client feedback and satisfaction data on the services it provides' and in Standard 9.1b we are instructed to develop our assessment strategies 'in consultation with enterprises/industry'.

If we are using the workplace for assessment, Standard 9.3vii requires that the RTO negotiates the assessment strategy with the employer, works with the employer to integrate any on-the-job assessment, and schedules workplace visits to monitor and/or review the assessment.

These requirements for consultation are important, as it is crucial that assessments reflect current workplace practices and contexts. The potential problem lurking behind these consultations is that they may result in inappropriate and invalid changes in assessment standards. There have been a number of examples where a local industry group has sought to impose additional criteria for qualification, to amend a unit of competency by deleting a locally irrelevant element, or even to delete an entire unit of competency from the core of a qualification. **The standards laid down by the Training Package are not negotiable.** They represent industry's voice, expressed through an extensive national consultation and design process. Once endorsed, these standards provide the basis for national consistency and national recognition.

Source: *Trouble-shooting Guide – Competency Based Assessment - Department of Education and Training.* <http://www.ncver.edu.au/research/proj/nr06012.pdf>

11. Record of attendance

- Provision must be made to record the attendance of students while on work-based training placement, including starting and finishing times.
- The attendance record used must be approved by WAIFS. Attendance must be entered into WISENET for all students. Although WAIFS does not monitor attendance under Standard 11

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of the National Code, non-attendance by a student can be used to identify students at risk of not making satisfactory progress in advance of/at the end of the usual end of semester review of this requirement.

12. **Dissemination of Policy**

- All new WAIFS trainers will be given training relevant to this policy;
- Training will occur as changes are made (or at least annually)
- Policy is available on WAIFS shared drive.

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