



# Justification of Training Hours for High Risk Work Units of Competency

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## Introduction

With the Australian Skill Quality Authority (ASQA) introducing Volume of Learning Indicators for Qualifications in the Registered Training Organisation Standards 2015, there is a need to justify the number of hours training for Units of Competency for High Risk Work. The Units of Competency for High Risk Work are Stand-Alone units and are not part of a Training Package or Qualification.

DTW Designs (Qld) Pty Ltd has four such Units of Competency on Scope of Registration and it is these four units to which this justification applies.

## Scope

This scope for the Justification of Training Hours will consider the following points:

- Units of Competency on Scope of Registration for DTW Designs (Qld) Pty Ltd
- The Attendance Category for Boilers
- The applicable Australian Standards
- The Industry Sector of Employers
- The Plant Type and Level of Complexity
- The commencing knowledge and skill of trainees enrolling and
- Previous High Risk Work training requirements.

## Units of Competency on Scope

DTW Designs (Qld) Pty Ltd has the following High Risk Work Licensing Units of Competency on Scope of Registration.

- MSABLIC001 Licence to Operate a Standard Boiler (Certificate III Level)
- MSABLIC002 Licence to Operate an Advanced Boiler (Certificate IV Level)
- UEPOPL001A Licence to Operate a Steam Turbine (Certificate IV Level)
- UEPOPL002A Licence to Operate a Reciprocating Steam Engine (Certificate IV Level)

## Attendance Categories for Boilers and Australian Standards

Boiler attendance categories are defined in AS2593 Boilers – Safety Management and Supervision Systems defining boilers in three categories as shown in Table 1 of AS2593.

These categories are:

- Unattended (No High Risk Work Licence required)
- Limited Attendance (High Risk Work Licence required)
- Attended (High Risk Work Licence required)

The categories are determined based on the type and capacity of the boilers and in general terms, Unattended are at the low risk end of the scale with Attended Boiler at the high risk end of the scale.

Boilers in the 'Unattended' category are not considered in this justification.

## Employer Industry Sectors, Plant Type and Complexity

All industry sectors are represented in this justification though some larger industries may be singled out for ease of clarification. These larger industries are:

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- Power Utilities
- Petro-Chemical
- Chemical and
- Sugar

While other sectors such as Abattoirs, Dairy, Brewing, Juice, Laundries etc. form the major smaller sectors.

The reason why the larger industries have been identified is because their plants tend to be more specialised and specific to the industry, while the majority of the smaller industries tend to have plant of a lesser level of risk and complexity than the large industries and plant of similar types.

The type of plant and the complexity of the plant is a major influence in determining training time required. Another consideration is the High Risk Work Licence Classes for Boilers (Boiler Standard and Boiler Advanced) and these will be a major consideration in the justification.

### Commencing Knowledge and Skill of Trainees Enrolling

Trainees enrolling in the four units of competency have traditionally been from many walks of life and with varying levels of education, literacy and numeracy. Traditionally we have been protected in some way by the WHS Regulators mandated requirement that trainees who are assessed for High Risk Work Licences must be able to speak, read and write in the English Language at assessment and on the job.

While this tends to assist, some employers simply allocate trainees to courses and enrol trainees who may have less than desirable Learning, Literacy and Numeracy capacity to reach their goal.

### Previous High Risk Work Training Requirements

In previous years there have been many changes to the High Risk Work Licences and indeed to the amount of training required to be considered for assessment. In recent years there has been in Queensland an idea of 'Nominal Hours' which the WHS Regulator has considered a minimum requirement for Training Plans and Log Books.

These hours were originally set not for training but the allocation of funding by government for the units of competency and have been adopted as a de-facto number of training hours.

In fact the 2012 changes to Boiler Classes saw the loss of 60 nominal hours with the loss of the Boiler Intermediate Classification. This highlights the need to better determine training hours. In years past hours of training were typically 750 hours for what was old second class licences and 1000 hours for first class licenses. These were more in tune with the realistic approach to on-the-job learning.

### Training Packages

Training Packages for the various industries are available for employers to use for their trainees. Some employers do and some do not. In either case it is easy to map the Units of Competency in the various training packages against the requirements for the Licensing High Risk Work Units of Competency.

## Determination of Training Hours

DTW Designs (Qld) Pty Ltd will adopt the mapping process for the industry groups as the means of determining the industry hours for learning. By mapping Training Package Units of Competency against the Licensing High Risk Work Units of Competency a minimum number of hours will be able to be determined for the industry/employer.

The hours then will be used as the standard and consideration for each trainee can be determined against these units to determine if any reduction in hours can be considered. Any consideration of a reduction in hours will require to be supported by documented evidence directly related to the Unit/s of Competency applicable.

## Training Hours

The following is a list of the Training Packages and hours applicable to ESI Competency Units that align with the Licensing High Risk Work Units of Competency as mapped for each industry group. These hours are a guide and may vary slightly from site to site determined by the plant and the employer's needs.

- Electricity Supply Industry Training Package
  - Boiler Advanced Fired Boiler 1320 hours from UEP12 + 40 hours of BA Course = 1360 hours
  - Boiler Advanced Heat Recovery Steam Generator (HRSG) 920 hours from UEP12 + 40 hours of BA Course = 940 hours
  - Steam Turbine 980 hours from UEP12 + 32 hours of Steam Turbine Course = 1012 hours
  - Reciprocating Steam Engine 220 hours from UEP12 + Reciprocating Steam Engine Course 32 Hours = 252 hours
- Sugar Milling Industry Training Package
  - Boiler Advanced Fired Boiler 670 hours from SUG02 + 40 hours of BA Course = 710 hours
  - Steam Turbine 420 hours from SUG02 + 32 hours of Steam Turbine Course = 452 hours
- Manufacturing Industry Training Package
  - Boiler Standard 640 hours + 32 hours BS Course = 672 hours
  - Boiler Advanced 660 hours + 40 hours BA Course = 700 hours
- Chemical Hydrocarbons and Refining Training Package

The Chemical and Refining Sector is a harder area to define hours due to the great variation in plant. For this reason hours are a guide only and will need to be determined based on the plant. As a guide the following Training Packages should be considered when determining hours.

- PMA08 Chemical Hydrocarbons and Refining Training Package
- Manufacturing Training Package
- Resources and Infrastructure Industry Training Package

## Conclusion

While due care has been taken in formulating this Justification of Training Hours for High Risk Work Units of Competency each trainee will be assessed and assigned hours based on their industry, their site and their prior skills and knowledge. The outcome of the assessment will determine the hours and tasks assigned in their Training Plan and Log Book.