



Submission Template | Asbestos Safety Training Options for Workers Entering Trades

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Whilst you can structure your submission in any form that you choose, you may like to use the questions below to frame your thoughts and ideas. Please write as much as you like.

The final question – question 9 – is open ended and asks for any feedback or experience you may like to give.

Information about submissions:

Please send your submission (or any questions) to engage@asbestosafety.gov.au

Consultation closes on **17 December 2021**. We will acknowledge receipt of all submissions received.

Please note that your submission may be published on our website. If you would like your submission to be excluded from publishing, or to be published anonymously, please indicate this below:

- do not publish submission
- publish submission anonymously
- other, please advise

Responses to questions posed:

1. Do you agree that asbestos awareness training is required *before* apprentices are at any risk of asbestos exposure? If so, what training do apprentices need?

(box will expand as you type)

Yes.

A nationally accredited prerequisite course (or Unit of Competency) in asbestos awareness should be mandatory in all states and territories as an entry requirement into all qualifications that are likely to come into contact with Asbestos.

This nationally recognised unit should sit outside of trade qualifications, but be a mandatory WHS requirement.



It is important that it sits outside of the trade qualification to ensure quality of delivery. There is a risk to the quality of delivery if the mandatory unit is included in the qualification as it is then available to all RTOs with the qualification on scope.

Delivery of a mandatory asbestos awareness course should be restricted to RTOs who are licensed to deliver the course and subject to ongoing audit and moderation activities of their facilities, staff and training materials.

In addition, it is also important that any mandatory awareness training is an entry requirement so that it is delivered prior to an apprentice commencing their qualification. This point is important, it is not uncommon in some areas for apprentices to commence their apprenticeship, but not attend a single day of off-the-job training (at an RTO) until months after commencement.

There are a number of nationally accredited awareness courses already developed and available that should be considered.

In addition, like the ACT, the course in Working Safely with Asbestos Containing Materials (10852NAT) should also be mandatory for apprentices and tradespeople in identified occupations.

2. While all WHS laws impose duties on PCBUs (or equivalents) to provide training, they are not prescriptive about what training needs to be undertaken or who can provide that training, apart from the ACT. Do these laws provide adequate protection to workers at risk of being exposed to asbestos? If not, how could they be improved?

No - they do not provide enough advice around suitable training. They need to be more specific and should include more specific advice. All WHS laws should be harmonised and amended to reflect the ACT requirements.

3. In your state or territory do the current asbestos training provisions in WHS regulations and codes provide enough information to determine what 'suitable and adequate' training means for asbestos related jobs?

Yes.

However as stated in question 2, all WHS laws across the country should be harmonised and amended to reflect the information provided in the ACT.

4. If further prescription about training is desirable, are there particular occupations which should be targeted (see for example the list at Appendix 1 setting out the occupations listed under the ACT legislative scheme).

Agree, all those identified in appendix 1 should be included.



5. Is nationally recognised training generally preferable to non-accredited courses to meet PCBU duties for workers entering trades who may be exposed to asbestos? Why?

Nationally accredited training is preferred as this ensures consistency, portability and recognition of units/qualifications across the country.

Nationally accredited training is also regulated and subject to industry consultation, validation and moderation. Nationally accredited training delivery and assessment can be customised to address any local or jurisdictional differences whilst still meeting the requirements of the unit/s.

All other forms of training and assessment are not regulated and may not meet industry or regulatory needs and could potentially put PCBUs at risk of not meeting their WHS obligations.

6. Do some PCBUs find choosing asbestos training difficult given the range of choice and the need to ensure training meets duties under WHS laws? Why? Do small businesses face any particular challenges in this regard?

Yes.

Each WHS law is different and there is no clear guidance in what is suitable and adequate training.

Small businesses face many challenges in sourcing and navigating the available training. However, nationally accredited training provides a layer of compliance with WHS obligations and further protection over workers compensation compared to non-accredited courses. Unlike nationally accredited training, non accredited training is developed ad hoc and not subject to the same checks and balances as nationally accredited training.

SMEs major focus is on running their business. They may not have the HR team or staff who understand the difference between optimal or suboptimal training. Providing clearer and more specific guidance will help SMEs meet their WHS obligations, keep their employees and customers safe and can get on with their core business.

7. Which of the options at 6.1 – 6.5, if any, do you support or not support and why? (You may wish to rank the options in order of preference).

E-Oz preferred options (from most to least preferred) are detailed below:

6.5 - Adoption of the ACT model

6.4 - WHS regulator to approve awareness course

6.3 - Improve encouragement from WHS regulators to choose specific training

6.2 - Core unit of competency to be incorporated into Training Package qualifications

6.1 - Maintain status quo.



E-Oz supports the adoption of the ACT model in all jurisdictions. If done correctly this would enable a holistic approach to ensure that every worker entering a trade (who may be exposed to asbestos) will have the necessary and adequate training to protect the operative, consumer and ultimately the general public.

8. Are there other levers which could be used to ensure all workers entering trades who may be exposed to asbestos receive adequate asbestos safety training?

Other levers that could be used or implemented include, making a nationally endorsed asbestos awareness training course:

- a condition of the occupational licence (for licenced trades)
- an entry requirement for trade qualifications (apprenticeship and others)
- Industry associations to include national accredited training as part of their requirements for members
- marketing campaign to inform industry and consumers of asbestos risks and ensuring tradespeople working on their house hold the approved training certification.

9. Are there any other issues you would like to comment on regarding the adequacy of asbestos safety training especially for workers entering trades where they may be exposed to asbestos?

Further to the ACT mandatory awareness course, the ACT has also implemented a mandatory Working Safely with Asbestos Containing Material course (10852NAT). This should also be adopted across all jurisdictions for apprentice and tradespeople in identified occupations.