

Exhibited Animal & Marine Wildlife Project

Summary of Validation Feedback, Responses and Actions:

Additional consultation relating to decisions around 240 hours mandatory work placement within the ACM30121 Certificate III in Wildlife and Exhibited Animal Care



February 2021

First draft (Round 1) Public Consultation Feedback was undertaken November-December 2019.

Validation Feedback (Round 2) Public and Subject Matter Expert Feedback was undertaken April-May 2020.

During the subsequent Edit and Equity and the Quality Assurance processes, issues were raised regarding potential barriers to learners if the 240 mandatory workplace hours was included in two units of competency and within the *ACM30121 Certificate III in Wildlife and Exhibited Animal Care* qualification. For example, learners who might import the units into another qualification, and who might be unable to gain the 240 hours of placement may be disadvantaged.

The Animal Care and Management Industry Reference Committee identified the need to undertake additional consultation regarding this concern, and this occurred during October 2020. Feedback was received via the Skills Impact Feedback Hub, direct emails to the 26 Subject Matter Experts and telephone calls.

Most stakeholders recommended removing the reference to mandated work placement hours from the qualification. As a result, they were removed from the *Certificate III in Wildlife and Exhibited Animal Care* and two core units. Stakeholders also supported the initiative to strengthen the Performance Evidence and Assessment Conditions within the two units to ensure assessments were completed within a suitable work setting. The information below relates to the consultation/validation undertaken during this additional consultation phase.

Feedback was received from a variety of stakeholders around the country via emails, phone and the Skills Impact Feedback Hub as follows:

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	National
Industry (employer / employee)									
Industry association									
Union*									
Registered Training Organisation (RTO)									
Government department									

* Note: Relevant unions across all States were provided with information but did not provide feedback

Feedback received during the additional consultation period (October 2020) supported removing reference to 240 hours of work placement within the *Certificate III in Wildlife and Exhibited Animal Care* and the two core units:

- ACMEXH301 Work within a zoological facility
- ACMEXH303 Prepare and maintain animal habitats

Performance Evidence and Assessment Conditions were strengthened in both units to support the workplace experience necessary.

Below is a summary of the feedback raised, views of industry stakeholders and from people who are part of the Subject Matter Expert Working Group process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the *Standards for Training Package 2012*. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

Acronyms - PC – Performance Criteria, PE – Performance Evidence, KE – Knowledge Evidence, AC – Assessment Conditions, SMEs – Subject Matter Experts, RTO – Registered Training Organisations

Summary of additional consultation relating to decisions around 240 hours mandatory work placement within the ACM30121 Certificate III in Wildlife and Exhibited Animal Care

A meeting was held on 8 October 2020 with the members of the IRC representing Captive Animals who approved removal of the mandatory work placement hours and for this version of the drafts to be opened for further public consultation.

Subject Matter Experts were contacted via email 9 October 2020, informing them of the concerns raised during Edit and Equity and Quality Assurance regarding the barriers for learners caused by the 240 hours of mandatory work placement in the qualification and in the two units of competency. Subject Matter Experts were asked to respond via email about whether they felt it would be suitable to remove the proposed 240 hour work placement, or whether the 240 hour work placement should be retained. Feedback supported removing reference to 240 hours work placement.

A Skills Impact news alert was sent out and the revised draft documents were placed on the Skills Impact website for public feedback 14 October 2020.

The majority of feedback received from Subject Matter Experts and public consultation, supported the removal of the 240 hour work placement and the strengthening of the Performance Evidence and Assessment Conditions within the two units. These changes ensure assessments are completed within a suitable work setting, including practical tasks involving live animals in line with animal welfare principles, without causing barriers to learners by mandating a specific number of work placement hours.

This information was presented to the IRC under general business as an updated change to the Case for Endorsement and agreed to by all IRC members in December 2020.

A summary of the feedback received during the additional consultation period is below.

Stakeholder feedback supporting removal of 240 hour mandatory work placement

Stakeholder Comments and Identified Issues	
RTO	I am happy with the changes; I do have a suggestion in the assessment conditions can we add live animals to it therefore it must be completed in a real work environment. I am happy to discuss if you like.
Industry	I have read these documents and I am not sure that I can give all that much input into them. I think that the amendments make sense and look reasonable to me.
RTO	I am happy to endorse these changes
Industry	Just to advise that I concur with the changes suggested (to remove reference to 240 mandatory workplace hours within the qualification and strengthening the performance evidence and assessment condition with the two core units of competency).

Stakeholder Comments and Identified Issues	
Industry	<p>I've read through the information attached and my feedback is as follows: With the points in the revised proposal:</p> <ol style="list-style-type: none"> 1. I agree it should incorporate the 240 hours over the entire course, so practical work for all units can be incorporated into the total of 240 hours, don't set a specific time requirement on each unit. 2. No issue strengthening the performance evidence by being more specific- as long as it is achievable by a wide range of facilities (smaller vs larger zoological institutions). 3. Strengthening assessment conditions- I'm struggling with this one. Adding the zoological facility is fine as I'm assuming all providers and students are operating out of one but specifying 'live animals' without 'or simulated' will have huge implications with animal health and wellbeing. We just can't have untrained students undertaking the handling of a range of animals. There will be opportunities during their practical placement hours but to specify it to occur specifically under assessment conditions with a trainer to complete specific handling method/tasks etc will go directly against the zoos own animal welfare, WHS and dignity and respect charter policies and procedures. Actual animal handling is taught on the job once employed as the staff and animals are covered under these policies.
RTO	<p>In relation to the Cert III in Wildlife and Exhibited Animal Care I would provide the following comments: 240 hours is fine Changes to assessment conditions is fine What we do have an issue with is the use of live animals in assessments. If this criteria could be signed off by a Zookeeper during their practical placement, this would be okay as they are working on a daily basis with live animals. However, if we are expected to use live animals purely for assessment purposes and each student is required to interact with the animals then this will go against the Policies and Procedures in place at (workplace).</p>
Industry	<p>Supports plan to proceed with changes (to remove reference to 240 mandatory workplace hours within the qualification and strengthening the performance evidence and assessment condition with the two core units of competency).</p>
RTO	<p>Certificate III in Wildlife and Exhibited Animal Care</p> <ul style="list-style-type: none"> • Support for the removal of the 240 hours of work placement requirement from the Certificate III in Wildlife and Exhibited Animal Care. <p>Unit ACMEXH301 Work within a zoological facility</p> <ul style="list-style-type: none"> • Support the removal of the reference 240 hours of work placement requirement for ACM30121 from the Performance Evidence. • The removal of the reference to a simulated environment in the assessment conditions does not provide a barrier to the typical Victorian student cohort undertaking the training. No objection raised for this unit. • Issue around the consistency of use of term 'zoological facility'. ACMEXH301 Work within a zoological facility which states in the Application: 'This unit of competency describes the skills and knowledge required to work safely in a facility housing wildlife...'. This is a core unit for the Certificate III in Wildlife and Exhibited Animal Care which states: 'This qualification reflects the skills and knowledge required for individuals undertaking a range of animal care functions in a zoo, wildlife sanctuary, aquaria or other facility where animals are cared for or exhibited'. The qualification wording differentiates a zoo from other facilities housing wildlife. ACMEXH301 unit's title, Element 1, Performance Evidence, Knowledge Evidence and Assessment Conditions all use the term zoological facility. The assumption is the term zoological facility includes zoos (zoological gardens), wildlife shelters, aquaria and other facilities where animals are cared for or exhibited, however it is an assumption only. Is a 'facility housing wildlife' the same as a 'zoological facility'? The mixture of terms creates the potential for misinterpretation. Suggest review wording to provide consistency and clarity of meaning. <p>Unit ACMEXH303 Prepare and maintain animal habitats</p>

Stakeholder Comments and Identified Issues	
	<ul style="list-style-type: none"> • Support the removal of the reference 240 hours of work placement requirement for ACM30121 from the Performance Evidence. • The removal of the reference to a simulated environment in the assessment conditions does not provide a barrier to the typical Victorian student cohort undertaking the training. No objection raised for this unit.
RTO	<p>Thank you for the opportunity to provide feedback on the Exhibited Animal Care project. The materials have been circulated to WA stakeholders; however, we have received no further feedback. I understand that you have received feedback from (stakeholder), with regard to strengthening the assessment requirements in lieu of the removal of 240 hours work placement.</p> <p>The (stakeholder) understands that industry supports the inclusion of the 240 hours of work placement however, we recognise there are issues and downstream implications in mandating hours within units of competency. These include:</p> <ul style="list-style-type: none"> • the RTO/employer will need to provide/pay for an assessor/supervisor for the individual learner for the whole 240 hours. This could be costly to the RTO/employer to ensure adequate staff to supervise one or more learners. • retention of staff/learners may be difficult if they are required to supervise/be in training for an extended amount of time; and • the limited number of available workplaces and qualified staff for supervision. <p>In addition, currently there are potential implications with the COVID environment. This includes:</p> <ul style="list-style-type: none"> • accessing staff for supervision and to document/collect evidence of competence • students being unable to access workplaces due to government directives (such as social distancing restrictions) • industry determinations to not allow access to workplaces based on safety or reduced business activity; or • students themselves being unwilling to accept health risks associated with work placements. <p>Notwithstanding the above, the (stakeholder) appreciates the importance of the work practice and health and safety considerations attached to this industry, therefore:</p> <ul style="list-style-type: none"> • supports the inclusion of volume and frequency of assessment in the units of competency • supports the inclusion of assessment in a zoological facility in the assessment conditions; and • supports the removal of the mandated 240 hours of work placement.
Industry Association	<p>The removal of the 240-hour requirement is generally supported. While the intent is admirable, the TP should not be prescribing hours of training/experience required. Competence should be determined by the RTO based on evidence. However, this does place additional pressure on the assessment requirements to be clear and specific.</p>

Stakeholder feedback supporting inclusion of 240 hour mandatory work placement

Stakeholder Comments and Identified Issues	
Industry	<p>As it stands currently, our Cert III students do at least 240 hours of placement, which is extra to any work they do with regards to study units. So, each student does one day (8 hours) per week for the duration of the course. So, 8 hours x 36 weeks = 288 hours of practical skills which exceeds the 240 hours but is giving them the best chance of employment and up-skilling. Then they also do their class days for the theory aspect. I believe there needs to be the 240 hours of 'placement' stipulated because if they do not complete those hands-on placement hours, in short, they will not get a job because they do not have on-the-job experience.</p>

Stakeholder Comments and Identified Issues

RTO

The original description is very similar to what is in the current ACM40418 Cert IV Veterinary Nursing, so it was accepted in that course review (eventually!)

- The original wording for 240 hours of work placement is no different to the existing description in ACM40418 Cert IV Veterinary Nursing on TGA, where it says:

The Certificate IV in Veterinary Nursing requires access to patients (animals), clients, medical and surgical cases, veterinary staff, and practice policies and procedures.

To achieve this qualification, the candidate must have completed at least 240 hours of work placement as detailed in the Assessment Requirements of the relevant units of competency.

- And in each of the 12 core ACMVET4XX units, the following description in the Performance Evidence:

- performed the activities outlined in the performance criteria of this unit during a period of at least 240 hours of work in a veterinary practice.

- To-date, (this RTO) has not experienced any difficulty with the work placement requirements in Cert IV Veterinary Nursing. As long as the course is designed properly to take into consideration work placement requirements, and the methods used to gather the work placement evidence, having work placement in the qualification and unit descriptions should not pose a hindrance to this important component of a student's learning experience.

The original description and proposed revision seem to be different things

- The proposed revision to strengthen the skills tasks in the Performance Evidence, and the Assessment Conditions, is different to us wanting them to gain a period of hands on practical on the job experience over all units

The original description is about work placement hours and the need for work placement, for students to gain the experience required during training, so that they are job ready.

- The proposed revision is about skills that the student must demonstrate to satisfy the competency requirements.
- The proposed revision can still be included in the revision, but it may not lead to the outcomes that I find industry expects from the training package:
 - consistent training and assessment outcomes across RTOs
 - consistent levels of experience of learners enrolling and graduating from the qualification
 - workplace exposure, including access to exotic and native species
 - access to an actual real-life workplace whilst undertaking their whole course, and not just specific subjects

Could we design a work placement core unit (probably not at this late stage)?

Stakeholder Comments and Identified Issues	
	<ul style="list-style-type: none"> • One possible approach could be for work placement to be as a separate core unit suitable only for Cert III Wildlife and Exhibited Animal Care. It could contain the required work placement hours and the Knowledge Evidence, Performance Evidence and Assessment Conditions for work placement. • This core unit could specify the nature of the work placement, such as: <ul style="list-style-type: none"> ▪ As a block of work placement, or minimum number of days per week ▪ Types of captive animal facilities to be used for work placement ▪ How work placement evidence should be provided <p>If we can have Work placement in Vet Nursing but not this qual – how is it done in other courses at all?</p> <p>Also we find work placement is mutually beneficial</p> <ul style="list-style-type: none"> • Some captive animal facilities rely on a steady flow of volunteer students to supplement their workforce, as much as the students relying on the facilities for their work experience, and this is beneficial as they very often get offered employment during their course as this is a very competitive industry to get into. • Many zoos will not take volunteers unless they <u>are</u> enrolled into this course • It's also a trade level course – this qual enables the graduate to be employed as a keeper in the end <p>Maybe overall we could strengthen the course description by taking a leaf out of vet nursing and putting in this course requires access to live exotic animals in a captive animal setting, facility records etc or something similar?</p>
RTO	<p>I have huge concerns in the removal of the 240 placement hours in the Certificate III in Wildlife and Exhibited Animal Care.</p> <p>I have been teaching the C3 Captive Animals for the past 6 years and have an amazing partnership with a very reputable zoo! During my time here a very large number of my students have gained employment at this particular zoo and at many others throughout Australia! I strongly believe that this is due to the one on one time they spend with the keepers each week as well as the face to face class time. It is like a years' probation for the employer and it is a fantastic way for the students to show their skills and gain such a wealth of knowledge and a massive amount of practical experience in both working with animals and how the industry operates! I am very concerned as this will 100% be lost if the hours are removed!</p> <p>I interview all my students and they are so exceptionally excited to have this opportunity given to them when they are successful! It would be a devastating loss to the industry as a whole to lose this opportunity for trainees starting in this field. I have been in the zoo industry for 23 years and I was stunned to hear that this was a possibility! I also believe that it will make practical assessments extremely difficult to complete. These hours allow the students to be a part of the industry as they learn.</p>
RTO	<p>Removal of the 240 hours limits entry level keepers to gain valuable hands on experience and potentially employment at the end of the qualification - highly disagree with this decision as its one of the most important elements of the entire course. The students gain real hands on experience and enjoy this element of the course the most from my experiences as a teacher and a previous trainee keeper</p>

Stakeholder Comments and Identified Issues

Industry	<p>I appreciate the notification of this change. I have spoken with my Curator at work and I don't know if I feel ok with the removal of the hours from the requirement for the course,</p> <p>The reasoning for this is that currently there are RTO's that offer that amount of hours or more. I have concerns about the integrity of the qualification if the hour amount is not definitively stated within the qual. Is there a way we can create a unit that is purely prac that is a core unit? This would mean it is not imported by other quals and ensures the prac occurs?</p>
Industry	<p>It is a tough one, but we certainly understand the concerns. Our belief is certainly that the practical time spent is the most important part of this course - and really believe that what is learnt in that prac time is so much more valuable than theory in so many instances, and almost pulls the theory work that has been learned into perspective and importantly adds a lot more value to potential employers as well, which is of course the often forgotten reason people are studying!</p> <p>So whilst we understand why it needs to be adapted and certainly the suggested changes still then allow for some practical experience guidelines students have to complete - but simply doing those things once or twice to meet the criteria - especially at a Cert 3 level, does not provide anywhere near the experience that 240 hours of practical experience does. For what it's worth maybe some guidelines on the amount of hours done as part of those extra activities outlined and what constitutes competence in terms of hours completed correctly completing these tasks may help - though also gets back to the problem of stipulating required hours which may cause the same headaches. More than happy to have a chat on the phone if that helps at all or to explain the thoughts further.</p>
Industry	<p>Don't remove the 240 hours. I don't care what assessment criteria you install; you can't assess these sorts of skills without being in a workplace enough to perform these duties regularly. It simply can't be done and put your hand on your heart and call someone competent.</p> <p>I have been through an ASQA audit and taught in this area for 15 years.</p> <p>Please don't take the 240 hours out.</p>