



# Australian Racing and Breeding Industry Sector

## Annual Update 2020

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### IRC Skills Forecast and Proposed Schedule of Work

Prepared on behalf of the Racing and Breeding Industry Reference Committee (IRC) for the Australian Industry Skills Committee (AISC).



# Contents

Purpose of this Skills Forecast .....	2
Method & Structure .....	2
COVID-19 Information .....	3
Industry Reference Committee.....	3
Executive Summary .....	4
Section A: Overview.....	5
Industry Developments.....	5
VET Qualifications & Employment Outcomes .....	8
Other Training Used by Employers .....	9
Enrolment Levels .....	11
Reasons for Non-Completion.....	14
Cross-Sector Units .....	18
Changes to Skill Requirements.....	18
Apprenticeship & Traineeship Barriers.....	18
Other Relevant Activities .....	19
Section B: Ongoing Consultation.....	21
Section C: Proposed New Work.....	25
2020–2021 Project Details.....	25
Project 1: Alterations to Packaging Rules and Application Statement in the Certificate II in Racing Industry .....	25
Description.....	25
Rationale .....	25
Background .....	26
Implementation .....	26
Ministers' Priorities Addressed .....	27
Consultation.....	27
Scope of Project Overview .....	27
Summary of Components.....	28
Project 2: Simplifying Certificate IV Qualification for Jockeys.....	29
Description.....	29
Rationale .....	29
Ministers' Priorities Addressed .....	30
Consultation Plan.....	31
Other Relevant Information .....	31
Scope of Project Overview .....	31
Summary of Components.....	32
IRC Sign-Off .....	33

# Purpose of this Skills Forecast

This Skills Forecast and Proposed Schedule of Work presents the latest industry intelligence from Racing and Breeding Industry Reference Committee (IRC), inclusive of national and industry data sources and input from key stakeholders. It further proposes vocational education and training (VET) Training Package review and development work that the IRC deems necessary to meet the needs of industry. The Australian Industry and Skills Committee (AISC) considers this information and includes commissioned work in the National Schedule<sup>1</sup>.

At its June 2019 meeting, the AISC changed the requirements for the annual Skills Forecast. IRCs are now required to submit comprehensive Skills Forecasts once every three years, with abridged annual updates in the intervening two years. As IRCs submitted comprehensive Skills Forecasts in 2019, the next are due in 2022.

This document is not intended to be representative of every issue encountered across all industry sectors; it identifies and addresses the challenges and opportunities that industry has determined as 'priority' for this stage of the schedule, and is a resource for industry and associated skills, learning and accreditation bodies seeking to act upon them.

Detailed information concerning industry skills needs across all sectors covered by the Racing and Breeding IRC, including information from previous Skills Forecasts, can be found on the Skills Impact website: <https://www.skillsimpact.com.au/racing/skills-forecast/>.

## Method & Structure

This is an annual update to the comprehensive Skills Forecast submitted in 2019. IRCs are required to answer the questions in **Section A** to provide updates on issues such as industry skills and workforce development, and qualification utilisation.

IRC's are also permitted to propose additional Training Package development work projects to be included in the Proposed Schedule of Work. Where relevant, these are included in **Section C**, which includes:

- Evidence of employer and industry need for graduates;
- Alignment to Ministers' Priorities;
- Consultation plan.

**Section B** details the extensive, robust and ongoing industry consultation undertaken by IRC members and Skills Impact, including with rural, regional and remote stakeholders. In line with Skills Impact's values<sup>2</sup>, this helps to ensure transparency and accountability in the process of industry research and Training Package development work.

This Skills Forecast and Proposed Schedule of Work is developed in line with:

- Standards for Training Packages 2012<sup>3</sup>;
- Training Package Products Policy<sup>4</sup>;
- Training Package Development and Endorsement Process Policy<sup>5</sup>.

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<sup>1</sup> <https://www.aisc.net.au/content/national-schedule>

<sup>2</sup> <https://www.skillsimpact.com.au/about/>

<sup>3</sup> <https://docs.education.gov.au/documents/standards-training-packages-2012>

<sup>4</sup> <https://docs.employment.gov.au/documents/training-package-products-policy>

<sup>5</sup> <https://docs.employment.gov.au/documents/training-package-development-and-endorsement-process-policy-0>

# COVID-19 Information

This Annual Update to the Skills Forecast does not include detailed responses to the COVID-19 situation, which are being provided separately to the Australian Industry and Skills Committee (AISC) and the Department of Education, Skills and Employment on a continuing basis. The material in this Annual Update was researched and written during 2019 and early 2020, which only includes the early stages of the response to the outbreak of COVID-19. This is a rapidly evolving situation and there are major differences to the short, medium and long-term skills and labour needs of industries. The IRC and Skills Impact are working with the Department of Education, Skills and Employment to determine contingency, response and recovery plans to address reduced training system capacities; ensure workforce continuity for critical occupations across the economy; and support an emergency, temporary workforce for critical sectors, where appropriate (including strategies to swiftly re-skill newly-unemployed individuals so that they may enter sectors requiring workers).

While the content of this Industry Skills Forecast Annual Update will remain pertinent as the Australian economy and industries recover, the IRC may identify additional work and changing priorities.

## Industry Reference Committee

The Racing and Breeding IRC (RGR IRC) is responsible for national training package qualifications relevant to racing and breeding in the thoroughbred, harness and greyhound industries.

Qualifications overseen by the IRC are in the *RGR Racing and Breeding Training Package*.

The RGR IRC is supported by the Skills Service Organisation, Skills Impact.

Name	Organisation or Area of Expertise
Geoff Bloom (Chair)	Racing Australia
Ron Fleming (Deputy Chair)	Racing and Wagering WA (RWWA)
Stuart Rich	Racing NSW
Ali Wade	Expertise in animal welfare and breeding
John Sutherland	Expertise in animal welfare and breeding
Kathleen Mullan	Harness Racing Australia
Kevin Ring	Australian Jockeys Association
Dr. Mariko Lauber	Greyhounds Australasia
Dr. Norman Blackman	Greyhound Racing NSW
Rachael Bambry	Racing Queensland
Ruth Taylor	Expertise in animal welfare and breeding
Wayne Lee	Australian Trainers Association
Briony Moore	Thoroughbred Racing SA
Cameron Wright	Australian Workers Union NSW
Brooke Meehan	Racing Victoria
Position Vacant	Harness Racing Victoria

# Executive Summary

The Racing and Breeding Industry Reference Committee (RGR IRC) has successfully completed updating the *RGR Racing and Breeding Training Package*, while addressing urgent and emerging industry issues.

The training package now covers animal welfare issues, including skills for re-training and re-homing horses and greyhounds, and training safety issues. It has also been updated to include all the general skills needed to work in the industry.

The RGR IRC is currently focused on implementation issues to ensure the maximum uptake of training amongst industry participants. It is further addressing flexibility of training issues to promote the delivery of training package products and so enhance the development of skilled workers, especially in regional, rural and remote Australia. There remains a critical shortage of track riders, and the RGR IRC is examining ways in which training package development may support industry solutions on an on-going basis.

In this area, additional skill sets are being created and existing qualifications and skill sets are being simplified. The RGR IRC will also work to identify non-accredited training in the industry throughout 2020.

The RGR IRC is undertaking specific work to:

- Remodel existing skill sets for exercise and track work riders and introduce a new skill set for fast work riding, using existing units.
- Address an issue preventing participants in the greyhound industry from undertaking the Certificate II in Racing Industry.
- Simplify the Certificate IV in Racing (Jockey) and - Certificate IV in Racing (Harness Race Driver).

The RGR IRC will also work, both with industry and with other IRCs, to identify data and evidence to address questions posed in the new Annual Update format introduced by the AISC. The IRC is currently unable to provide fully informed responses and statistical data to address the AISC's questions as they were only introduced recently and there have been no additional resources provided to undertake investigative work. Having addressed its highest priorities, the RGR IRC will now allocate time and resources to developing a response to the AISC's queries. However, the RGR IRC notes that it is unlikely, given the nature of the topics being covered and the level of resources available, that there will be significant advancements in the levels of data captured.

During 2020, the RGR IRC will continue to collect feedback on the implementation of the updated Training Package and will look for ways to simplify training delivery and participation in the industry, while maintaining focus on the safety and welfare of participants and racing animals.

# Section A: Overview

## Industry Developments

### Track Riders

Shortages of track riders is an on-going issue nationally. Racing NSW, for example, identified that a “recurrent issue raised from the extensive consultation undertaken with the industry is the shortage of suitably trained stable staff and trackwork riders. This shortage is experienced across all sectors of racing throughout NSW.”<sup>6</sup>

An equine industry survey, conducted by Skills Impact on behalf of the Animal Care and Management Industry Reference Committee (ACM IRC), which included participants in the racing and breeding industries, confirmed that the shortage of track riders is one of the industry’s greatest concerns. Below is a selection of survey responses:

#### Track riders

- “We are screaming for track work riders and grooms. There is an untapped potential of rural kids who genuinely love working with horses.”
- “Definitely a lack of riders coming through. Insurance/liability makes this difficult.”
- “Skills shortage with track work riders and people who have prior experience with horses.”
- “Riding track work is a dying skill. Such a huge shortage.”
- “There is a lack of experienced and skilled track riders.”
- “Definite shortage of track work riders. From there you can then define suitability by size, experience and suitability. The need to certify would-be track work riders is a lot of cost for someone who may not want to proceed beyond one or two days in the industry.”
- “There is a shortage of qualified track riders.”
- “Track riders probably are the missing link for skills and quantity.”
- “There is a massive shortage of track work riders and grooms.”
- “There is a shortage of good track riders and a shortage of good horsemanship skills in general.”
- “There is a need for track work riders (experienced).”
- “Trackwork riders are hard to find, my local racing club [...] has no other means for exercising horses, they used to use joggers but aren’t allowed on course anymore and the club would definitely benefit from another form of exercising as it gets quite hard on the track in the warmer months.”
- “Serious shortage of competent track riders.”

Difficulties in employing suitable candidates for track rider roles were exacerbated when, in 2017, the Temporary Work Skilled Visa (Subclass 457) scheme was abolished. This prompted trainer David Hayes to issue a grim warning: “Probably 80% of our track riders are from overseas [...] It’s a skilled job having million-dollar colts and you can’t have inexperienced people learning to ride on racehorses. It’s dangerous for them and it’s dangerous for the horse”<sup>7</sup>.

<sup>6</sup> Racing NSW, 2019, p.35, *Strategic Plan as at April 2019*, viewed March 2020 <[https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018\\_3\\_Final.pdf](https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018_3_Final.pdf)>

<sup>7</sup> The Sydney Morning Herald, 2017, *David Hayes fears Malcolm Turnbull’s 457 visa crackdown could bring racing industry ‘to its knees’*, viewed March 2020 <<https://www.smh.com.au/sport/racing/david-hayes-fears-malcolm-turnbulls-457-visa-crackdown-could-bring-racing-industry-to-its-knees-20170419-gvno3x.html>>

Major industry bodies have been addressing these challenges ever since. Subsequent changes to government policy have allowed track riders to be sourced internationally, but on the condition that they undertake training; for example, through an apprenticeship or traineeship<sup>8</sup>. Industry stakeholders report that many visa holders already possess relevant skills and do not require a full course of training to achieve a qualification. As a result, non-accredited training and selective upskilling is being explored. Recognition of Prior Learning, however, has been limited due to the lack of RTOs with relevant training package products on scope and delivery issues, such as the inability to offer training in regional locations and the absence of formally qualified assessors.

## Case Study: Riders from the Philippines<sup>9</sup>

Racing NSW has arranged for up to 40 riders and jockeys from the Philippines to enter Australia under a trainee Visa program for track work riding. Riders of different levels, from entry level track riders to apprentice jockeys, will be recruited, trained and upskilled by Racing NSW to provide a competent workforce for industry trainers.

On arrival, riders are to complete a two-week safety induction training course and then be placed in pairs in a regional NSW location. Throughout their stay, training and upskilling is to continue through practical exercises facilitated by Racing NSW jockey coaches and on-line learning managed by the Racing NSW Training Academy.

Whether local or international, trackwork riders, along with jockeys, represent the “most important skill required for the racing industry into the future”<sup>10</sup>. As such, in 2019, Racing NSW devised a two-part initiative to assist trainers with the shortage of track riders. Their intention is to employ suitable riders and implement a ‘fee-for-service’ system with trainers (with the help of the clubs). It is hoped that this initiative will encourage local riders not to leave the industry, or to return, as Racing NSW will seek to provide participants with a regular, reliable source of income in place of, for example, ad hoc work for several independent trainers. Furthermore, they will look to place workers in regional areas, and some will be offered career pathways, including to jockey apprenticeships and beyond<sup>11</sup>.

The Racing and Breeding (RGR) IRC are also responding to these industry challenges. It has taken note of a survey conducted by the Australian Trainers Association, which identified the following issues:

- The Certificate III in Racing (Trackwork Rider) qualification is cumbersome and creates more work for racing trainers.
- Skill sets for track riders would be more valuable in addressing the skills shortage.
- A skill set may be more attractive to local learners, and would assist in the upskilling of visa workers.

Trackwork riders, along with jockeys, represent the “most important skill required for the racing industry into the future”

[Racing NSW, 2019, Strategic Plan]

The IRC consequently are exploring potential changes to existing skill sets for trackwork riders, which will assist people (who may not want to be jockeys) in developing a career as a trackwork rider.

<sup>8</sup> Queensland Government, 2019, *Trackrider*, viewed March 2020

<<http://qtis.training.qld.gov.au/Qualification/Details?modelCode=RGR30518&version=0&trainingCatalogNumber=22214>>

<sup>9</sup> Racing NSW, 2019, p.36, *Strategic Plan as at April 2019*, viewed March 2020 <[https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018\\_3\\_Final.pdf](https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018_3_Final.pdf)>

<sup>10</sup> *ibid.*

<sup>11</sup> Racing NSW, 2019, pps. 35-36, *Strategic Plan as at April 2019*, viewed March 2020 <[https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018\\_3\\_Final.pdf](https://www.racingnsw.com.au/wp-content/uploads/RNSW-Strategic-Plan-2018_3_Final.pdf)>

### *Proposed Approach*

The RGR IRC is developing specific skill sets, including a Trackwork Rider Skill Set, to fill the needs of industry and encourage greater use of accredited training. There will also be an additional Skill Set for Fast Work created. These skill sets will use only existing units of competency and will provide a clear pathway, thus ensuring the VET system is easier to navigate for learners, employers and regulators.

### **Certificate II in Racing Industry – Change to Core**

The Certificate II in Racing Industry includes a core unit, *ACMEQU205 Apply knowledge of horse behaviour*, which is inappropriate for greyhound industry participants. As this qualification is intended as an introduction to the racing industry generally, but allows for specialisation in distinct sectors or roles through elective units, Greyhound Racing NSW has requested an urgent change be made to the qualification so that only units applicable across the racing industries are included as core. Only then will the Certificate II in Racing Industry be suitable for learners whose intended occupation is in greyhound racing.

### *Proposed Approach*

The RGR IRC discussed the issue set out above and support, in principle, deleting *ACMEQU205 Apply knowledge of horse behaviour* from the core unit list. Moving it to the list of elective unit options is the favoured approach.

The IRC acknowledge that updating the Certificate II in Racing Industry in this way would constitute a 'major change', necessitating a full review of the qualification. However, recognising the current delivery issues impacting RTO and industry, and the relative simplicity of the change, the IRC will seek to have a Case for Change and Case for Endorsement considered together. These will be submitted to the AISC separately rather than with this Annual Update to the Industry Skills Forecast.

### **Animal Welfare & Overbreeding**

Overbreeding<sup>12</sup> and wastage<sup>13</sup> remain contentious issues for the racing and breeding industries. The RGR IRC has responded to these challenges, where possible, through recent updates to the training package; however, the impact of these changes are not expected to be evidenced substantively for a few years (until RTOs are able to get the new training package products on scope, and deliver them to learners who go on to have careers in the industry). Meanwhile, the most immediate improvements will be driven by government and industry regulations.

The industry takes seriously welfare issues, and is committed to continually improving its awareness and actions to achieve better results for the animals. Currently, bodies within the thoroughbred racing industry are working together to establish the Independent Working Group, to be Chaired by Dr Denis Naphine, to review the national welfare landscape. Driven by the Australian Thoroughbred Breeders association, working with the Australian Trainers Association and the Australian Jockeys Association, this initiative is being supported by racing clubs, industry identities and government bodies. The Working Group will also have members with backgrounds in the RSPCA, Australian Veterinary Association and policy development.

In recent years, racing authorities in each state have worked to drastically improve rules and regulations, including:

- Thoroughbred Racing SA's Equine Welfare Framework<sup>14</sup>
- Racing Victoria's \$25 million welfare plan for thoroughbreds, with an immediate focus on their post-racing wellbeing<sup>15</sup>

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<sup>12</sup> Horse Betting, 2019, *Overbreeding Needs to be Addressed: RSPCA*, viewed March 2020 <<https://horsebetting.com.au/overbreeding-needs-to-be-addressed-rspca/123189/>>

<sup>13</sup> ABC News, 2018, *Wastage rules could lead to more horses bred for racing starving in paddocks, RSPCA warns*, viewed March 2020 <<https://www.abc.net.au/news/2018-07-09/footage-shows-ex-racehorses-starving-neglected-four-corners/9945512>>

<sup>14</sup> Thoroughbred Racing SA, 2016, *Equine Welfare*, viewed March 2020 <<https://www.theracessa.com.au/industry/retirement-of-racehorses>>

<sup>15</sup> Racing Victoria, 2019, *\$25 million commitment to equine welfare in Victoria*, viewed March 2020 <[https://www.racingvictoria.com.au/news/2019-10-28/\\$25-million-commitment-to-equine-welfare-in-victoria](https://www.racingvictoria.com.au/news/2019-10-28/$25-million-commitment-to-equine-welfare-in-victoria)>

- The Queensland Government's endorsement of recommendations from its horse racing inquiry report in February 2020, with a commitment of almost \$6 million to increasing resources for animal welfare practices<sup>16</sup>
- The WA Government's announcement in November 2019 of planned changes to the state's regulation of the racehorse industry (especially its welfare standards), including the introduction of random inspection of knackeries and measures to track the location and condition of retired racehorses<sup>17</sup>. In addition, Racing and Wagering WA has purchased property for rehoming of thoroughbred and standardbred racing horses.

This builds on the work reported in the Skills Forecast 2019 – 2022, including that every jurisdiction has adopted a version of the “off the track” programming for rehoming greyhounds, and the commitment of approximately 1% of stake money to these programs. The racing industry accepts that these measures are but one step towards meeting the exacting standards expected for racehorses, both within the industry and by the Australian public.

There are few independent research publications on what happens to horses after their racing career; however, there has been intensifying public scrutiny of retired racehorse welfare after a 2019 ABC exposé on the slaughter of horses for pet food and human consumption in New South Wales and Queensland<sup>18</sup>. While this, and other recent coverage, has focussed on the operations of the meat production facilities, which source horses from various backgrounds (with a minority being former racehorses), the racing industry is being held accountable to its stated ambition of ensuring that animals are appropriately cared for after their racing careers.

Based on strong industry support, improved animal welfare skills and knowledge criteria have been included in the updated training package. Specifically, training package products have been developed for re-educating and re-homing retired racing horses and greyhounds.

## VET Qualifications & Employment Outcomes

The RGR IRC has fully updated the RGR Training Package in as short a period as possible to ensure that qualifications are fit for purpose and deliverable. The RGR IRC has worked with other industry reference committees, especially the Animal Care and Management IRC, to migrate relevant qualifications over to the RGR Training Package where they address specific racing and breeding industry needs and facilitate greater welfare standards for horses and greyhounds. These include the Certificates III and IV in Horse Breeding, and Diploma of Horse Stud Management.

The racing and breeding industries are highly regulated and require proof of proficiency, integrity, safety and experience for many job roles. Jockeys undertake one of the most dangerous professions in Australia<sup>19</sup>, with animal handling carrying an inherent risk of injury. While qualifications are not mandatory for all roles, they are proof that participants meet mandatory requirements, especially in the context that racing animals require the highest standards of care.

Specific regulatory requirements differ in each jurisdiction and job role. Nationally accredited qualifications and statements of attainment meet industry requirements, while evidence of non-accredited training may suffice for licensing purposes where it is deemed to be equivalent to relevant RGR qualifications.

Potential learners may be unable to enrol in qualifications due to RTOs not offering training in specific regions; for example, because of the unviability of ongoing capital, animal care and facility maintenance requirements, or an absence of qualified trainers and assessors. Stakeholders report that, as a result, employers may develop non-accredited training, which is often based on the RGR Training Package. This allows employees to

<sup>16</sup> Queensland Country Life, 2020, *Horse racing industry inquiry in Queensland yields results*, viewed March 2020 <<https://www.queenslandcountrylife.com.au/story/6625269/horse-racing-industry-safeguards-put-in-place/>>

<sup>17</sup> ABC News, 2019, *WA racing industry overhaul to track the welfare and whereabouts of retired racehorses*, viewed March 2020 <<https://www.abc.net.au/news/2019-11-14/wa-racehorses-welfare-plan-to-track-wellbeing-of-retired-horses/11702504>>

<sup>18</sup> ABC News, 2019, *Hundreds of racehorses sent to slaughterhouses in contravention of racing rules*, viewed February 2020 <<https://www.abc.net.au/news/2019-10-17/racehorses-sent-slaughterhouses-contravention-racing-rules/11611688>>

<sup>19</sup> B.A. Curry, P.L. Hitchens, P. Otahal, L. Si, & A.J. Palmer, 2015, *Workplace Injuries in Thoroughbred Racing: An Analysis of Insurance Payments and Injuries amongst Jockeys in Australia from 2002 to 2010*, *Animals (Basel)*, 2015, 5(3): 897–909.

demonstrate some equivalent levels of competency despite not possessing formally recognised qualifications. This point is elaborated in sections below.

NCVER data, sourced from the National Student Outcomes Survey, on RGR Training Package graduates<sup>20</sup> indicates that:

- 78.5% of those not employed before training became employed after training.
- 10.2% of those employed before training became employed at a higher skill level after training.
- 83.4% of those employed after training received at least one job-related benefit.
- 72.9% of those employed after training were in the 'Arts and Recreation Services' industry, a broad grouping of sectors that encompasses occupations such as 'jockeys' and 'dog and horse racing officials'.

The racing and breeding industries face the same workforce and training availability shortages as many other sectors based in rural, regional and remote (RRR) Australia. As a result, employment models have changed, and the industry faces difficulties in accessing funding for apprenticeships and traineeships, which have traditionally been the backbones of workplace-based training delivery. Lack of required training provisions has exacerbated difficulties in attracting new workers into the industry. Further information is provided in the section on 'barriers to apprenticeships and traineeships'.

The RGR IRC supports further research, whether commissioned by the AISC, through Skills Impact or NCVER, to collect and present statistics and evidence around this issue, which is of relevance across all training packages.

## Other Training Used by Employers

RGR IRC and key stakeholder feedback indicates that the major reasons for training outside the national system are due to racing industry regulation and RTO delivery issues. Reasons for the development of non-RTO training include:

- In the last few years, a number of RTOs have taken RGR qualifications off scope because of increased safety standards and resultant costs of delivery.
- Formal RTO training is unavailable in many regions, including most of the Northern Territory, Tasmania and ACT. This training shortage cannot be compensated through online or virtual delivery because the RGR training package necessitates hands-on capabilities development.
- Throughout Australia, all jockeys and most track riders are sole traders and therefore do not have a single employer who is responsible for their professional development. In many jurisdictions trackriders ride at public tracks for multiple trainers and may go to private facilities after tracks close to ride for another trainer. As a consequence, traineeships are unsuited to many trackrider training situations. As such, they bear the full costs of their own training and are not eligible to enrol in an apprenticeship or traineeship program.
- Barrier attendants and harness catchers in Perth are receiving non-accredited training, based on the RGR Training Package and delivered by experienced professionals. There is no available RTO and the cost of using the VET system makes it impractical to utilise accredited training, however the assessment follows the relevant units' assessment needs in content. However, with no qualified assessors available, learners are not formally assessed in a manner consistent with the national system.
- Industry participants frequently move from state to state, following industry meetings and work patterns. Consequently, many would-be apprentices and trainees are unable to fulfil specific work placement requirements stipulated within qualifications.

There is a shortage of RTOs with the RGR Training package on scope, with no formal RTO training in many regions. This training shortage cannot be addressed through online delivery.

<sup>20</sup> NCVER, 2019, *VET graduate outcomes*, SAS Visual Analytics

As part of their mandatory training under visa conditions, skilled migrants who join the industry need up-skilling to satisfy Australia's high work, safety and regulatory standards. However, employers require that they be active workplace participants as quickly as possible, and there is no requirement, given existing skills and knowledge, to deliver full qualifications. Consequently, limited formal training is often supplemented with on-the-job, informal training.

The RGR IRC confirms that, to meet licensing and regulatory requirements, a number of states' Principal Racing Authorities are utilising the content of RGR units of competency to develop training and credentialing programs outside of the national system. Victoria, for example, is introducing compulsory track rider registration, which is likely to be conditional upon evidence of training but, crucially, not necessarily possession of a VET qualification.

Some Principal Racing Authorities are utilising units of competency to develop training and credentialing programs outside of the national system.

The RGR IRC has been advised that, for greyhound racing, the only formal training taking place is in NSW. While no formal greyhound qualification is being delivered in Victoria, Greyhound Racing Victoria (GRV) has had mandatory in-house training for years and utilises the Training Package, including recent updates, to develop these programs. GRV makes their developments available to other jurisdictions for utilise.

Greyhound Racing Victoria has had mandatory in-house training for years and utilises the training package.

The role of skill sets and other micro-credentials in encouraging engagement with the national system needs to be considered further. The lack of recognition of these as some form of credential at a specific AQF level continues to undermine their standing within industry, and leads to further use of non-accredited training (albeit, ironically, often based on the RGR Training Package). While this approach may result in competent industry participants, it weakens the reputation of the national system, and obstructs its objective to be recognised internationally as an exemplar for the unison of industry and training. As an adjunct, it is clear that the national system's focus on RTO-based enrolments and training, along with the strict compliance standards set by regulatory bodies, has led to the Recognition of Prior Learning process failing the racing and breeding industry.

There is undoubtedly an industry demand for shorter-form training, yet the national system is predicated (i.e. established, regulated, funded and monitored) upon the achievement of full qualifications. Even the recent AQF Review failed to recommend the formal identification of skill sets for anything other than credit on a Recognition of Prior Learning or Recognition of Current Competency pathway.

#### *Proposed Approach*

The RGR IRC:

- Has identified additional skill sets to offer more flexibility in training delivery
  - A skill set has been developed to assess trackwork riding skills for those entering the industry with previous experience with horses (the majority of potential trackriders)
- Will consider a response to the AQF Review, especially concerning the non-endorsable and unrecognised nature of skill sets and other micro-credentials;
- Will consider AQF Review recommendations concerning the proposed Credit Pathways and the opportunities that may arise for the racing and breeding industry;
- continues to seek support for the development of national assessment tools and training resources.

There is industry demand for shorter-form training, yet the national system is based upon the achievement of full qualifications.

# Enrolment Levels

*Please note: NCVER's database, VOCSTATS, only displays enrolments for the years 2015-2018 at present. This is partly because it only became mandatory for RTOs to report their training activity from 2014. NCVER have now stated that "2014 was a transition year" and that only data from 2015 is considered reliable. This Industry Skills Forecast Annual Update, therefore, presents only data for the years 2015-2018 because many RTOs did not report their activity in 2014, and combining new and old datasets could result in spurious trends being shown.*

## **Systemic challenges causing low enrolments**

The RGR IRC faces competing priorities regarding the standards that govern its activities and the ministers' objective to delete qualifications with low/no enrolments. The IRC is required to support "nationally consistent qualifications that reflect the skills and knowledge required to successfully operate in a particular occupation", while training products must reflect "occupational skills needs of an industry, or a group of industries, to facilitate employment and vocational outcomes for individuals"<sup>21</sup>. Thus, the IRC's role is to engage with industry to describe current (and future) occupational skills standards, and *not* to ensure formal RTO enrolments within the VET system.

To be sure, RTO enrolment volumes have very little relationship with the criticality of skills to different sectors, or the value of those skills to the wider economy, nor the risks to society of not having properly trained workers in specific niche occupations or industry activities.

New units are developed to meet new ways of working but, at the same time, it is not advisable to delete units that describe older methods of work that are still in use (but which cannot be incorporated into the new products), whether in workplaces, for training or as a guide for businesses who utilise them to create and maintain job descriptions or standard operating procedures.

The IRC understand the imperative to reduce the numbers of qualifications and units within the system overall, as RTOs cannot be expected to keep up with an ever-expanding list of offerings. On the other hand, the retention of current skills within the system provides significant flexibility for RTOs to meet local industry needs, while also retaining the accurate description of current skills.

Specifically, the RGR IRC has made efforts to incorporate imported units. The IRC has identified that when it tries to utilise imported units, they are often totally unsuited to the specifics of industry and learner group even when contextualised in content. This process has identified that while there are many units that seem to cover similar areas, there are few that can truly be applied across industries because of the nature of both the industry and learners. Therefore, this problem is differently seen from outside the industry sectors, while within them there are not many available options that are suitable.

RTOs choose to deliver units based on viability, local markets and the availability of appropriate people and resources. As a result, the RGR IRC believes that many units are underutilised despite reflecting current practices within industry. Low levels of delivery against any specific group of units or qualifications should not always be seen as indicative of these training package products not being wanted and, hence, should be deleted. It may instead signal that the system places unreasonable demands upon RTOs, which have consequently withdrawn from delivering in these areas. Skill sets, which are becoming more prevalent and are in greater demand, may be part of the solution and the RGR IRC is committed to fostering greater recognition of these.

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<sup>21</sup> Australian Industry and Skills Committee, 2019, pps.4-5, *Industry Reference Committees: Operating Framework for the Development of Training Packages*, viewed February 2020, <[https://www.aisc.net.au/sites/default/files/documents/IRC%20Operating%20Framework%20-%20201912\\_0.pdf](https://www.aisc.net.au/sites/default/files/documents/IRC%20Operating%20Framework%20-%20201912_0.pdf)>

## Industry challenges causing low enrolments

The RGR IRC acknowledges that low enrolments indicate current lack of engagement with the formal training system, but does not accept that low enrolments entail low engagement with the training package.

Evidence from reports by Principal Racing Authorities, industry participant members' associations and employers specify that the reasons for low enrolments are:

1. Delivery issues: in particular,
  - the inability of RTOs to deliver in regional areas and the lack of available, qualified assessors (for all racing and breeding sectors)
  - Caps that may exist on some RTOs (eg not for profit) on overall enrolment levels, resulting in requirements to choose which qualifications to offer
2. The prohibitive costs of delivering formal training: in particular, having to bear the expense of developing and maintaining training and assessment materials, while retaining compliance professionals to ensure adherence to industry and safety regulations, as well as animal care and facility maintenance requirements.
  - There are specific issues with having suitable horses available for training delivery and the excessive amount of reporting and assessment of individual horses along with the safety issues related to the group size and supervision requirements of horse related training is very costly: there is no allowance / assessment of training costs in any state funding models
3. An inability to access financial training support through apprenticeship/traineeship programs, or other funding mechanisms, due to the structure of the industry: many industry participants are sole traders, operating on a fee-for-service model with multiple clients across several states, which is inconsistent with supervised learning models currently being used in the VET system.
4. The use of non-accredited training, either to compensate for the absence of RTOs or to enable timely up-skilling of industry participants (especially to avoid attempting to navigate the complexities of the Recognition of Prior Learning process).
5. An industry-wide inability to attract new (especially younger) entrants to the workforce, especially in the occupations that are related to VET qualifications. While the IRC has considered how a career pathway can be developed, there are no resources to devote to a project of this type.

### *Proposed Approach*

The RGR IRC will work with other IRCs who are experiencing similar challenges to develop a submission to the AISC, with a view to obtaining their supporting for forwarding potential solutions to the relevant COAG, Federal and State Authorities; these may include calls for:

- Research into the substantive access issues that create, and are created by, thin markets, especially in regional, rural and remote areas. and to consider whether the recommendations of the Report on National Regional, Rural and Remote Tertiary Education Study will help address the complexities, costs, connectivity and other issues that are influencing access to assessment and training.
- More flexible approaches to assessment, especially involving peer and workplace-based tasks. The focus should be on competence in undertaking job roles and functions, with moderation by experts from multiple sources (e.g. in addition to RTO assessors with Certificate IV in TAE, assessors from universities, schools and workplace should be considered).
- The remodelling of apprenticeship/traineeship models to suit new work approaches, including the 'gig economy' and fee-for-service operators, potentially including multiple supervisors, workplace learning locations and clients.
- Obtaining support for developing consistent, national training materials and assessment tools.

## Training Package products that should be retained

Please note, all enrolment figures below are inclusive of the current and any superseded versions of qualifications where there is data provided by NCVER. This is to more accurately assess demand for, and uptake of, a particular occupational skills need.

There are various reasons why a qualification may appear as 'low enrolment' but should be retained. Below is a sample of these.

### Qualifications recently reviewed/updated

All RGR Training Package qualifications have been fully updated (with Release 1 dates of either 18/12/2017, 05/07/2018 or 10/09/2019). Correspondingly, all RGR units have recently been reviewed and updated, and there have been numerous deletions. To inform these activities, industry has submitted content feedback through the IRC and supported the subsequent changes made, signifying an industry-wide consensus that the current units of competency are fit for purpose and comprehensive.

Due to the recency of the updates and releases of RGR qualifications and units, it is too early to identify low/no enrolment training package products for deletion. NCVER data has only been released up to the end of 2018, and the RGR IRC advises that it can take up to two years for RTOs to develop training and assessment materials and get a new qualification or units on scope. As such, any qualification released after 01/01/2017 cannot yet be assessed as 'low enrolment' because there has not been sufficient time to analyse RTO/industry supply and demand.

However, demand may reasonably be expected to rise when a qualification has been significantly updated to reflect current industry practices and occupations and so meet industry needs (ascertained through extensive consultation regarding current and future skills and tasks). The RGR IRC expects that these updated qualifications will attract a wider audience over the next few years and that businesses will increasingly seek employees who are qualified through the national system.

**Table 1: Low-enrolment qualifications recently reviewed/updated**

Current Qualification	Enrolments				Current Qual Release 1
	2015	2016	2017	2018	
RGR10118 - Certificate I in Racing (Stablehand)	83	37	38	30	5/07/2018
RGR20117 - Certificate II in Racing (Greyhound)	0	0	0	0	18/12/2017
RGR30117 - Certificate III in Racing (Greyhound)	0	0	0	0	18/12/2017
RGR30318 - Certificate III in Racing (Driving Stablehand)	0	0	0	0	5/07/2018
RGR30419 - Certificate III in Racing Services	25	53	54	25	10/09/2019
RGR30619 - Certificate III in Horse Breeding	104	90	39	32	10/09/2019
RGR40318 - Certificate IV in Racing (Harness Race Driver)	43	30	5	5	5/07/2018
RGR40419 - Certificate IV in Greyhound Racing Industry	716	27	0	0	10/09/2019
RGR40518 - Certificate IV in Racing Integrity	1	0	0	0	5/07/2018
RGR40619 - Certificate IV in Horse Breeding	0	0	0	0	10/09/2019
RGR50118 - Diploma of Racing (Racehorse Trainer)	12	29	5	2	5/07/2018
RGR50218 - Diploma of Racing Integrity Management	2	0	0	0	5/07/2018
RGR50319 - Diploma of Horse Stud Management	0	0	0	0	10/09/2019

Source: NCVER VOCSTATS, TVA program enrolments 2015-2018

### *Qualifications recently migrated from another training package*

Three current qualifications in the RGR Training Package have recently been migrated from other training packages:

- RGR30619 - Certificate III in Horse Breeding (AHC to ACM to RGR)
- RGR40619 - Certificate IV in Horse Breeding (ACM to RGR)
- RGR50319 - Diploma of Horse Stud Management (ACM to RGR)

When a qualification migrates into a new training package, it enables that IRC and industry stakeholders to enact greater ownership over it. In this scenario, more advisers from the horse breeding and stud management sectors will have the opportunity to contribute to the development and maintenance of the above qualifications (without necessarily having to compromise with viewpoints submitted by representatives from other sectors), which facilitates a clearer pathway for the insertion of specialist skills and knowledge criteria. This is likely to improve industry satisfaction with the training package and so catalyse greater demand for formal training.

As Release 1 of these qualifications – as part of the RGR Training Package – was in September 2019, it is not yet possible to judge their volume of enrolments.

### *Low industry demand at present, but future importance and opportunities*

As training delivery is partially informed by, and reflective of, industry trends, it is understandable that greyhound racing industry qualification enrolments have declined over the past few years (see Table 1).

Following a series of industry controversies<sup>22</sup>, the Australian greyhound racing industry was further thrown into turmoil in 2016, when former High Court judge Michael McHugh authored a *Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales*<sup>23</sup>. In this report, evidence was presented regarding the high rates of euthanasia of uncompetitive greyhounds, the under-reporting of greyhound injuries and death, and illegal live baiting practices.

However, because enrolment figures for qualifications such as the Certificate IV in Greyhound Racing Industry show that there was demand for training prior to the widely publicised industry scandals, enrolments are likely to increase once more as the industry restructures and expands. Such training package products are arguably all the more important given their renewed focus on the care, welfare and management of greyhounds and are thus part of the solution for the betterment of industry and reclaiming social license. Thus, while there are low enrolments in the meantime, there is a risk of deleting qualifications or units which will later become needed for their vital role in ensuring the welfare of greyhounds and rebuilding the industry using best-practices.

## Reasons for Non-Completion

The RGR IRC expects that the AISC has access to more accurate and timely information concerning these issues. The IRC would be interested in obtaining any information from exit surveys and other sources that may be available only to RTOs or NCVER.

In Skills for Victoria's Growing Economy Issues Paper<sup>24</sup>, published in March 2020, it is identified that:

***“While completions in VET are low, the reasons for this are varied. A much better understanding of the drivers of non-completions is needed to inform an effective policy response.”***

There is a critical concern over attracting the next generation of workers to industry training and demonstrating potential occupation pathways to them. While NCVER data suggests low 'success' rates in the RGR Training Package (shown in Table 2 below), more research is required to establish the true extent of course non-

<sup>22</sup> ABC News, 2015, *Greyhound racing industry: Vet Association calls for dogs to be registered with independent authority to protect them*, viewed March 2020 <<https://www.abc.net.au/news/2015-04-19/greyhound-racing-aust-vet-assn-calls-for-dog-registration/6404254>>

<sup>23</sup> State of NSW, 2016, *Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales*, volumes 1-4.

<sup>24</sup> Skills for Victoria's Growing Economy, 2020, p.31, *Skills for Victoria's Growing Economy Issues Paper*

completion issues<sup>25</sup>. Certainly, as 84.9% of RGR Training Package graduates in 2018 were ‘satisfied with the overall quality of training’ and 88.5% ‘achieved their main reason for training’<sup>26</sup>, this suggests that non-completions are a far more complex issue than is implied by the completion rates alone.

**Table 2: Completion rate**

Training Package	Completion Rate (2017)
Racing and Breeding (RGR)	42.0%

Source: NCVET, private data request

For instance, if the purpose of vocational training is to obtain employment, achieving this aim prior to completing a qualification may lead learners to discontinue their formal education. Furthermore, it is widely believed throughout the VET sector that state- and territory-based funding models play significant roles in non-completion figures. Funding is often only available to RTOs when learners enrol in full qualifications, even when their intent is to achieve competency in one or a cluster of units for specific work purposes. Learners will cancel the qualification after completing these units, having achieved their objective, but will be recorded as a non-completion against the full qualification; they will be recorded as a ‘failure’ when in fact they – and potentially their employer – are satisfied customers.

As noted earlier, the RGR Training Package has been fully updated to meet industry needs, thus completion rates are expected by the IRC to rise over the coming years as learners and employers find training to be continually relevant and fit-for-purpose (though it is too soon to quantify this).

The RGR IRC notes, however, that the nature of industry *job roles* means that a relatively high rate of non-completions is anticipated in qualifications relating to trainers, jockeys, track riders and harness drivers. This is due to the advanced levels of safety precaution, horsemanship and general skills and expertise that must be developed in order for learners to progress in this professional sporting industry. Younger entrants may experience physical growth that prevents them from participating further as a jockey. It is unfeasible for people to test their skills, for example as jockeys, in a competitive amateur context at an early age, making a higher non-completion rate arguably foreseeable. This is because learners – who may be relatively untested in a racing context – may not have the capabilities to continue with formal training. Even when people do advance beyond the foundational level, it may be that, even if training facilitates capabilities for working safely and competently in the industry, success is still dependent upon additional talents and qualities that are beyond the scope of VET to nurture.

Non-completions are also to be expected given the nature of the *industry*. Undoubtedly, the racing and breeding industries present extremely challenging working environments, with long hours and small returns for the majority of participants. Many individuals have to work in additional roles to supplement their income, while others leave the industry for lifestyle reasons. As with all professional sports-related training, there is an expectation that not all enrolments will result in completions; and, in fact, whether a learner completes or cancels their formal training is a way for industry to identify those who are (un)suitable for specialist roles.

The RHR IRC note the importance of on-the-job and workplace-based training, ahead of classroom training. Entrants to the industry are often attracted by the prospect of working with animals and not having to complete class-based work. This is becoming increasingly important as there are more potential industry entrants with little or no experience working with racing animals.

An emerging issue is that imported units are causing irrelevant training to be delivered. The IRC has received negative feedback from participants undertaking the RGR40218 Certificate IV in Racing (Jockey) regarding the core units, *BSBSMB303 Organise finances for the micro business* and *BSBSMB305 Comply with regulatory, taxation and insurance requirement for a micro business*: it is widely considered that these BSB units have too much irrelevant material, which are then delivered in a classroom context and not in a racing context. These units also appear as elective options in other RGR qualifications (see Table 3).

<sup>25</sup> Building on work by NCVET, such as: A. Bednarz, 2014, *Understanding the non-completion of apprentices*, NCVET, Adelaide.

<sup>26</sup> NCVET, 2019, *VET graduate outcomes*, SAS Visual Analytics

**Table 3: Imported BSB units of competency**

Qualification	Imported unit of competency	
	BSBSMB303	BSBSMB305
RGR30117- Certificate III in Racing (Greyhound)	Elective	Elective
RGR40118 - Certificate IV in Racing (Racehorse Trainer)	-	Elective
RGR40218 - Certificate IV in Racing (Jockey)	<b>Core</b>	<b>Core</b>
RGR40318 - Certificate IV in Racing (Harness Race Driver)	Elective	Elective
RGR40419 - Certificate IV in Greyhound Racing Industry	Elective	-

Source: [training.gov.au](http://training.gov.au)

The IRC determined that there is no need for those BSB units appearing as core in the Certificate IV in Racing (Jockey), potentially reducing the size of the qualification, and so the cost of delivery.

Using imported units in the RGR Training Package creates challenges, especially given the profile of learners, most of whom tend not to favour 'academic' approaches to education (particularly classroom-based work with textbooks and related documentation that has only limited relevance to their intended careers). Even for applied training, the assumption may be that importing units relating to work health and safety is appropriate; however, for RGR qualifications aimed at potential jockeys, track riders and harness drivers, imported units contain information that is irrelevant to these occupations, such as references to Safety Committees (that are rarely needed in racing and breeding due to most industry operators being sole traders or part of small businesses). Furthermore, given that jockeys and track riders undertake some of the most dangerous occupations in Australia, safety skills and knowledge training delivery must be overt and specifically aimed at this critical aspect of industry.

#### *Proposed Approach*

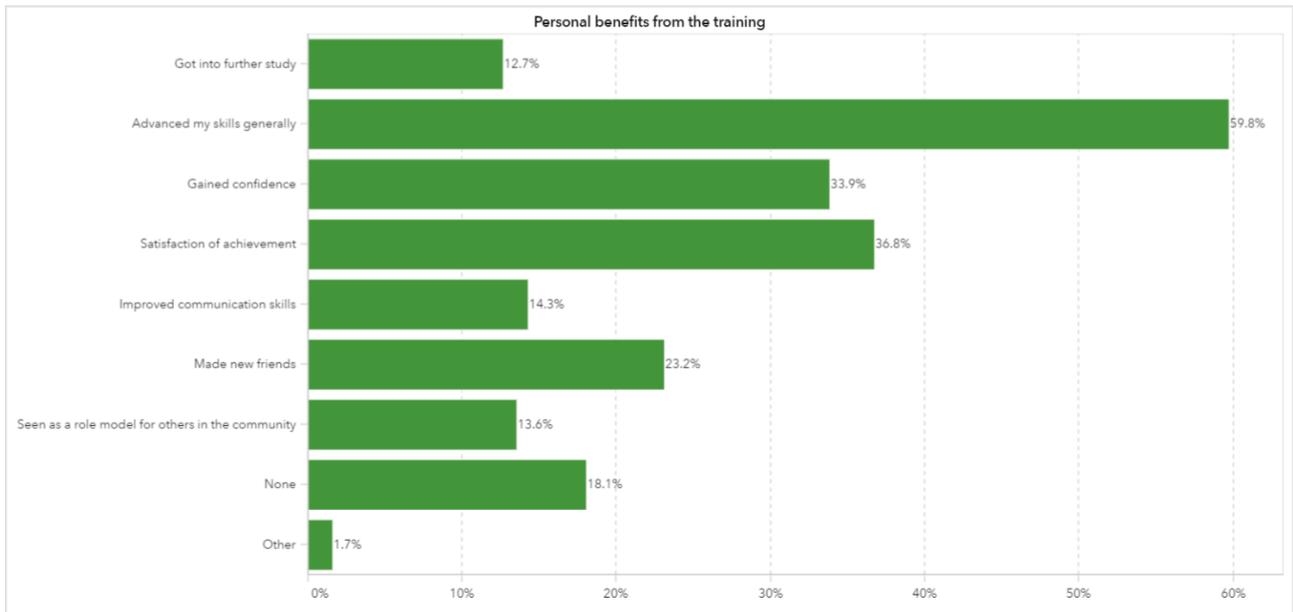
- The RGR IRC will submit a Case for Change to propose a project to change two current BSB units from the RGR40218 Certificate IV in Racing (Jockey) from core to elective.

#### **Purpose for completing qualifications and skill sets**

The RGR IRC does not have access to RTO-submitted AVETMISS data that would allow it to track RGR enrollees' 'study reason' and collate statistics on those who complete qualifications or skills sets. It can, however, access NCVER's 'VET graduate outcomes' data visualisation tool, which uses data sourced from the National Student Outcomes Survey (which, by its nature, collects data on students' retrospective reflections, which may not relate to their original purpose for undertaking training).

Of RGR graduates, 88.5% achieved their main reason for training (although 'reasons for study' are undefined). Graduates perceived personal benefits after their training, including:

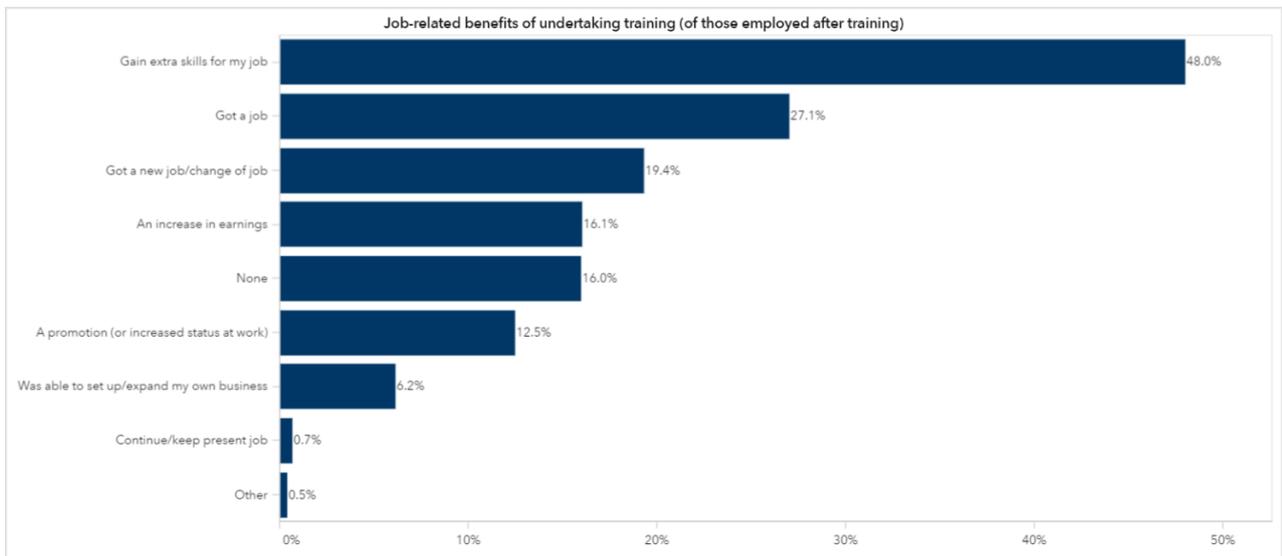
**Figure 1: Personal benefits from training (RGR)**



Source: NCVER, VET graduate outcomes

The job-related benefits of undertaking training (of those employed after training) perceived by RGR graduates are as follows:

**Figure 2: Job-related benefits of undertaking training (of those employed after training) (RGR)**



Source: NCVER, VET graduate outcomes

Despite recent improvements in NCVER data<sup>27</sup>, there are many areas in which a higher level of detail would facilitate more nuanced analyses. For example, future data releases on graduates could include data so that they can be assessed according to variables such as their Training Package qualification and 'student remoteness region' to allow comparison of outcomes in major cities, regional and remote areas.

## Cross-Sector Units

Cross-sector units are not currently applied within qualifications that are part of the Racing and Breeding RGR Training Package.

The recent focus of the RGR IRC has been to update the Training Package, which had become outdated. This has now been achieved, and specific shortcomings that were raised, especially in relation to safety and welfare issues, have been addressed. The RGR IRC will assess any feedback received on the implementation of the updated training package and will continue to analyse its contents with a view to further simplifying it for learners and RTO delivery. Opportunities provided by the AISC to re-examine the entire training package, using any new tools that are developed, will be taken.

## Changes to Skill Requirements

There have been no major changes to skill requirements since the completion of the 2019–2022 Skills Forecast and recent updates to the RGR Training Package.

Several issues have been raised regarding implementation of the newly updated training package (as outlined above) and these will be addressed:

- The need for nationally consistent training and assessment instruments;
- Corrections to the packaging rules in the Certificate II in Racing Industry (to ensure relevance for people who intend to work in greyhound racing);
- Establishing whether an RGR unit can replace the imported BSB units in relevant qualifications.

## Apprenticeship & Traineeship Barriers

The Government of Western Australia<sup>28</sup> have identified barriers to the uptake of apprenticeships, including:

- Apprenticeships and traineeships are not widely promoted or understood by young people and the community.
- The VET sector is misunderstood and undervalued by the community, schools and employers.
- There is an absence of promotion and marketing of apprenticeships and traineeships in the wider community.
- Young people need to receive quality career advice linked to labour market information.

Issues continue to exist for RTOs attempting to deliver the updated RGR qualifications. These have been acknowledged above, including changing work structures and practices, fee-for-service models (including an increasing application of the 'gig economy' in regional and rural areas) and multi-jurisdictional operations.

Traditional racing structures are changing. In the last decade, training partnerships have been introduced with a consequent growth in stables working with higher numbers of horses and greyhounds. Breeding has become more professional (less hobby breeders), and both people and animals are more commonly moving between states for racing, breeding and sales.

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<sup>27</sup> COAG Standing Council on Tertiary Education, Skills and Employment (SCOTESE) agreed to the introduction of mandatory reporting of nationally recognised training activity from 2014 onwards. Under this mandatory reporting, all Australian training providers (excluding those exempted by regulators) delivering nationally recognised training to students, either in domestic or in overseas locations, are required to report their training activity to NCVER.

<sup>28</sup> Government of Western Australia, 2018, p.11, *Strategies to grow apprenticeships and traineeships in Western Australia*, State Training Board

For example, while Rural Training Australia delivers Certificate III Racing – Track Rider traineeships as part of Racing and Wagering WA's (RWWA) Apprentice Jockey Training program, traineeships for actual track riders are not available through this program. This is due to prohibitive costs to employers and track riders being contracted to multiple licensed racehorse trainers, which is incompatible with the requirements for traineeships. Regulators and industry strictly control group training arrangements (partially due to integrity considerations). With acute shortages found in regional areas, employers have been forced to rely on skilled migration to fill vacancies, particularly for track riders (aligned to ANZSCO 361112 Horse Trainer).

There is support for a balanced approach to increasing safety and mitigating risks in vocational training, providing students have adequate exposure to workplace learning and realistic experiences with a range of horses or greyhounds. This is to ensure workplace readiness and to alleviate risk following completion of a qualification.

### *Proposed Approach*

Barriers to employers hiring apprentices and trainees is a systemic issue requiring relevant bodies, including the AISC, to consider different approaches to apprenticeships and traineeships. This is increasingly critical as workplace models, which are designed for major cities, continue to fail in regional, rural and remote areas. As a result, the 'gig economy' and fee-for-service models are increasingly being used in these locations.

Addressing barriers to employers hiring apprentices and trainees requires greater flexibility in concepts of supervision, workplace learning, self-directed learning and the pathways to apprenticeships and traineeships. In addition, new models of funding need to be developed to provide support to learners and 'supervisor' entities (perhaps distributed through a 'crowd-sharing' method).

The Racing and Breeding IRC believes the way to promote this approach is by supporting and working with a national network of RTOs who are committed to servicing the industry. A key enabler of this would be the development of national assessment tools and associated resources (with the IRC's support). This would allow a more economically-viable application of skills training, to national standards, across all jurisdictions. It would permit transferring between assessors and trainers across jurisdictions, and assessment evidence to be gathered by multiple workplace-based staff.

## Other Relevant Activities

Several states have been trying to develop assessment tools and training materials. This is because individual RTOs are struggling to meet the financial burdens of developing their own materials. These costs, which few RTOs are able to justify financially, are proving to be a major obstruction to training delivery. Various RTOs have had to focus on developing specific units rather than trying to develop materials across qualifications, arguably lowering the likelihood of completion rates improving in the future.

The racing industry has expressed the desire for linking nationally recognised training products to licensing, particularly skill sets for stablehands, track riders, and horse and greyhound trainers. Progress is impeded by the cost of enrolment for employers and the lack of local delivery in each state to support these occupations. The development of national assessment tools and associated resources would go a considerable distance towards addressing these issues.

There are concerns over qualifications for licensed horse and greyhound trainers. In each industry, the trainer faces ultimate responsibility for all industry integrity issues. An increasing focus on social licence to operate, changing community standards, the expanding purview of industry regulation and evolving workplace skills requirements entails a growing need for formal training and assessment, recognised through qualifications, skills sets and licensing.

The RGR IRC is aware of the thin market for RTOs and the expense of providing training, which results in RTOs being reluctant to apply for qualifications or skill sets to be on scope. Given the nature of this regulated industry – with significant integrity, and human and animal health and welfare considerations – the IRC believes it is urgent to find ways to encourage formal and structured training.

With stakeholders representing current training delivery options for people to learn industry skills as patchy, ineffective, expensive and state-focused, safe employment and career development in the industry is under threat. The proposal to develop national training and assessment materials is part of a broader strategy to connect the industry with training resources and RTOs, and to facilitate access to career pathways for which training, leading to national qualifications, is the vehicle.

#### *Proposed Approach*

The RGR IRC continues to support industry calls to formalise training and assessment in order to enhance the developed national skills standards, as outlined in the training package, and to improve the safety of workers, consistency across jurisdictions, and industry participants' skills transferability (nationally and internationally). As materials have been developed for some units, the IRC would modify its previous proposal to include an approach for identifying currently available materials and to facilitate access to these, with the development of additional materials to fill the gaps. Consideration would need to be given to the IP and financial issues involved in making developed materials more broadly available.

## Section B: Ongoing Consultation

Detailed below is the industry consultation undertaken by IRC members and Skills Impact, including with rural, regional and remote stakeholders.

Engagement activities are described across four key areas:

- **Ongoing engagement** and validation with industry and stakeholders
- Collection of **industry intelligence**
- **Promotion of the VET** system
- Cultivating and maintaining **networks and partnerships** with industry including engagement in rural and regional areas.

Entity Name	Sector	State	Rural/ Regional/ Remote	Ongoing engagement	Industry Intelligence	Promotion of VET	Networks & Partnerships
Anakie Greyhounds	Commercial Business	VIC	Yes	✓			
Arrowfield Group	Commercial Business	Multi State	Yes	✓	✓		✓
Arundel Equestrian	RTO private	National	Yes	✓			✓
Australian Federation Greyhound Owners, Breeders & Trainers Association	Industry Association	National	Yes	✓	✓		✓
Australian Greyhound Racing Association	Industry Association	National	Yes	✓	✓		✓
Australian Greyhound Veterinary Association	Industry Association	National	Yes		✓		
Australian Jockeys Association	Industry Association	National	Yes	✓	✓	✓	✓
Australian Online Racing Accreditation (AORA)	Regulator	National	Yes	✓	✓		
Australian Sports Commision	Local Government	National	Yes	✓	✓		
Australian Standardbred Breeders' Association (ASBA)	Industry Association	National	Yes	✓	✓		✓
Australian Trainers Association	Industry Association	National	Yes	✓	✓	✓	✓
Australian Warmblood Horse Association	Industry Association	National	Yes	✓			

Entity Name	Sector	State	Rural/ Regional/ Remote	Ongoing engagement	Industry Intelligence	Promotion of VET	Networks & Partnerships
Baramul Stud	Commercial Business	NSW	Yes	✓			
Berrys Creek Horsemanship Centre	Commercial Business	VIC	Yes	✓			
Brisbane Greyhound Racing Club	Commercial Business	QLD	Yes	✓	✓		
Caloundra Pony Club	Commercial Business	QLD	Yes	✓			
Chircop Greyhounds	Commercial Business	VIC	Yes	✓			
Cobb & Co Equestrian Pty Ltd	Commercial Business	National	Yes	✓	✓		✓
Coolmore Australia	Commercial Business	Multi State	Yes	✓	✓		✓
Dare To Go Bare	Commercial Business	TAS	Yes	✓			
Darley Australia Pty Ltd	Commercial Business	Multi State	Yes	✓	✓		
Ebby Greys	Commercial Business	NSW	Yes	✓			
Educational Services & Consultants Pty Ltd	RTO private	SA	No	✓	✓	✓	✓
Elite Greyhound	Commercial Business	VIC	Yes	✓			
Equestrian Australia	Industry Association	National	Yes	✓	✓		
Equestrian Western Australia	Industry Association	WA	Yes	✓	✓		
Equine Dental Association of Australia (EDAA)	Industry Association	National	Yes	✓	✓	✓	✓
Foxground Training Stables and Stud	Commercial Business	NSW	Yes	✓	✓		
Geelong Greyhound Racing Club	Commercial Business	VIC	No	✓			
Godolphin Pty Ltd	Commercial Business	Multi State	Yes	✓	✓	✓	✓
Greyhound Racing New South Wales	Regulator	NSW	Yes	✓	✓	✓	✓
Greyhound Racing SA	Regulator	SA	Yes	✓	✓	✓	✓

Entity Name	Sector	State	Rural/ Regional/ Remote	Ongoing engagement	Industry Intelligence	Promotion of VET	Networks & Partnerships
Greyhound Racing Victoria	Regulator	VIC	Yes	✓	✓	✓	✓
Greyhounds Australasia	Regulator	National	Yes	✓	✓	✓	✓
Harness Racing Australia	Regulator	National	Yes	✓	✓	✓	✓
Harness Racing Training Centre	RTO private	VIC	Yes	✓	✓	✓	
Hillcrest Christian College	RTO private	VIC	Yes	✓	✓	✓	
Horse Rider Fall Safety Training	RTO private	National	No	✓	✓		
Horse SA	Industry Association	SA	Yes	✓	✓	✓	✓
Ian Leighton Horsemanship	Commercial Business	TAS	Yes	✓			✓
International Horse College	RTO public	QLD	Yes	✓	✓	✓	
Newcastle Greyhounds	Commercial Business	NSW	Yes	✓			
NSW Greyhound Breeders Owners & Trainers Association	Commercial Business	NSW	Yes	✓	✓		
Queensland Racing Integrity Commission	Regulator	QLD	Yes	✓	✓	✓	✓
Racing and Wagering WA	Regulator	WA	Yes	✓	✓	✓	✓
Racing Australia	Regulator	National	Yes	✓	✓	✓	✓
Racing NSW	Commercial Business	NSW	Yes	✓	✓	✓	✓
Racing Queensland	Commercial Business	QLD	Yes	✓	✓	✓	✓
Racing Victoria	Regulator	VIC	Yes	✓	✓	✓	✓
Recreation South Australia	Local Government	SA	Yes		✓		
Rural Training Australia	RTO public	Multi State	Yes	✓	✓	✓	✓
Southern Hills Pony Club	Commercial Business	SA	Yes	✓	✓	✓	
Summit Racing Services	Commercial Business	NSW	Yes	✓			
Tara Greyhound Equipment	Commercial Business	NSW	Yes	✓			
TasRacing	Regulator	TAS	Yes	✓	✓	✓	✓

Entity Name	Sector	State	Rural/ Regional/ Remote	Ongoing engagement	Industry Intelligence	Promotion of VET	Networks & Partnerships
Thoroughbred Breeders Australia	Industry Association	National	Yes	✓	✓		✓
Thoroughbred Breeders of Victoria	Industry Association	VIC	Yes	✓	✓		✓
Thoroughbred Racing NT	Regulator	NT	Yes		✓		
Thoroughbred Racing South Australia	Industry Association	SA	Yes	✓	✓		
Victorian Master Farriers' Association	Employer Organisation	VIC	Yes	✓	✓		✓
Victorian Racing Academy	RTO private	VIC	Yes	✓			
WA Horse Council	Industry Association	WA	Yes	✓	✓		
WA Standardbred Breeders Association (WASBA)	Commercial Business	WA	Yes	✓	✓		✓
West Australian Racing Trainers Association	Industry Association	WA	Yes	✓	✓		✓
Western Australian College of Agriculture - Narrogin	RTO public	WA	Yes	✓			
Western Australian Jockeys Association	Commercial Business	WA	Yes	✓	✓		
World Wide Association of Equine Dentistry - Aust Inc.	Industry Association	Other	No		✓		

# Section C: Proposed New Work

## 2020–2021 Project Details

The RGR IRC resubmits 'Project 1: Creation of National Assessment Tools and Associated Resources and Materials', which was part of the Skills Forecast and Proposed Schedule of Work 2019–2022<sup>29</sup>.

This project was not approved by the AISC for work to be undertaken in 2019, but is hereby resubmitted for consideration of funding and completion in 2020.

## Project 1: Alterations to Packaging Rules and Application Statement in the Certificate II in Racing Industry

### Description

The RGR IRC recommends changing the packaging rules of the RGR20218 Certificate II in Racing Industry to allow participants in the greyhound industry, specifically in roles relating to track maintenance and administration, to utilise the qualification. This will require:

- Removing one unit from the core list and re-placing it as an elective;
- Inserting two current units as additional electives;
- Changing the Application Statement of the qualification.

### Rationale

The RGR IRC is proposing the following changes to RGR20218 Certificate II in Racing Industry

- That *ACMEQU205 Apply Knowledge of Horse Behaviour* be made an elective in *RGR20218 Certificate II in Racing Industry*
- That the *RGR20218 Certificate II in Racing Industry Packaging Rules* be adjusted to require the completion of 4 core units plus 10 elective units (currently 5 core and 9 elective)
- That *ACMEQU205 Apply Knowledge of Horse Behaviour* be added to Group E as an additional elective
- That *RGRPSG203 Promote and enhance greyhound behaviour* and *RGRPSG207 Demonstrate greyhound racing industry integrity and ethical practice* be added to Group E as additional electives
- That the Qualification Description be adjusted to read:
  - Competencies attained in the units packaged for this qualification will apply to the greyhound, harness and thoroughbred codes of the industry. Consequently, when performance criteria are applied, they will relate to the harness or thoroughbred code and a Certificate II in Racing Industry must contain a statement as follows:
  - 'This qualification was achieved under the conditions operating in the [insert relevant racing code – greyhound OR harness OR thoroughbred] code of the racing industry.'

The IRC believes that training is playing a key role in rebuilding the reputation and changing the practices of the greyhound industry and has the potential to provide more long-term support for the industry, if this change is approved.

The Racing and Breeding IRC are of the view that the qualification should be offered with *ACMEQU205 Apply Knowledge of Horse Behaviour* as an elective, to ensure participants in greyhound racing have access to the qualification. The IRC acknowledges that this was an oversight in the original recommendation, which would probably have been identified if the external circumstances noted above had been different.

<sup>29</sup> Skills Impact, 2019, *Racing and Breeding Industry Sector: IRC Skills Forecast and Proposed Schedule of Work, 2019–2022*, viewed April 2020 <[https://www.skillsimpact.com.au/site/skillimpactmedia/uploads/2019/05/ISF.RGR\\_IRCSkillsForecast.2019-2022.Final\\_.pdf](https://www.skillsimpact.com.au/site/skillimpactmedia/uploads/2019/05/ISF.RGR_IRCSkillsForecast.2019-2022.Final_.pdf)>

The IRC does not believe that there is any impediment to changing the Packaging Rules relating to the qualification, and it would not have any impact on currently enrolled learners or on RTOs currently delivering the qualifications. The members of the IRC have directly undertaken discussions with the relevant RTOs and Principal Racing Authorities. There have been no issues with this proposal raised, and strong support from all industry participants.

## Background

The qualification *RGR20218 Certificate II in Racing Industry* was created as a result of a review of the RGR Training Package during 2017/18, superseding three pre-existing qualifications. The qualification includes four streams and was intended to provide a foundation for participants in horse and greyhound racing.

The Review of the RGR Training Package was conducted during a time when:

- The greyhound industry faced major issues, including bans in some locations, which were either temporary or permanent
  - This led to the Greyhound Industry being only minor participants in the training product review project, and in particular to Greyhound NSW being unable to participate in the review
- There were incidents involving horse riding which led to an urgent requirement that the IRC review the Training Package with a view towards addressing major safety issues for RTOs
- There was a focus on ensuring that training related to horse breeding, formerly in the ACM training Package, were brought into the RGR Training Package to ensure integrity issues were addressed
- The Training Package had not been appropriately reviewed for a decade and major changes were required

The Unit of Competency ACMEQU205 *Apply Knowledge of Horse Behaviour* was a new unit released in November 2017 in response to urgent issues involving horse rider training safety. As it is a pre-requisite to a number of other units of competency within the horse breeding qualifications, it was made part of the core for RGR20218 Certificate II in Racing Industry. Currently the ACM IRC is considering a Case for Change designed to incorporate the content of this unit and other prerequisites directly into relevant units of competency throughout all relevant qualifications.

## Implementation

Greyhound NSW has been working on reshaping and improving the greyhound racing industry in NSW, and as a result has been working with potential RTOs to deliver training for the industry. In late 2019, they were able to identify and enter into an agreement with an RTO to deliver training, however in discussions, the issue relating to *ACMEQU205 Apply Knowledge of Horse Behaviour* became apparent.

While there is RGR20117 Certificate II in Racing (Greyhound) which is suitable for participants intending to be directly working with greyhounds, such as trainers and kennel attendants, *RGR20218 Certificate II in Racing Industry* is more suitable for those participants working in other areas, such as track maintenance, lure driving or administration, as it provides more relevant units for these workers (including the Track Maintenance and Administration streams of the qualification) and gives a basis for doing similar or related work across all sectors of the racing industry. This is especially important in regional locations where the broader qualification may provide opportunities for additional part-time or casual work across sectors.

The IRC has been approached by Greyhound NSW which is seeking an urgent resolution to this matter. It is difficult for all racing bodies to identify and obtain the services of an RTO for training purposes. In this case, Greyhound NSW is working to protect and improve the whole industry, including the welfare of animals and the integrity of the sport. They have found an RTO willing to deliver the training and assessment, however the RTO needs a viable level of training provision. This is threatened if full qualifications cannot be offered by the RTO, and in particular if *RGR20218 Certificate II in Racing Industry* cannot be offered by the RTO. The change will ensure that a suitable agreement can be reached for NSW, and potentially for other jurisdictions in the future.

## Ministers' Priorities Addressed

### **More information about industry's expectations of training delivery is available to training providers to improve their delivery and to consumers to enable more informed choices**

The change will make it easier for RTOs to provide appropriate advice to consumers by clarifying the pathways for entrants into different segments of the greyhound racing industry

### **The training system better supports individuals to move more easily between related occupations**

The work proposed will enable learners looking to work in greyhound racing track maintenance and administration to later move to similar roles in other racing codes.

### **Improved efficiency of the training system through units that can be owned and used by multiple industry sectors**

The proposed work will extend the current certificate II in Racing Industry to some participants in the greyhound racing sector.

## Consultation

In developing this Case for Change, the RGR has consulted with all of the relevant Principal Racing Authorities and relevant industry bodies. Given the unanimity with which the proposal has been greeted, the RGR IRC does not believe that further consultation is warranted.

### **Consultation with current RTOs**

The RGR IRC, through its SSO, have contacted all RTOs with the training on scope. Of the nine RTOs with the training on scope, only six are currently offering the training. Four were in favour of the change, and one did not respond. One RTO raised an issue which is addressed by changing the qualification application description as outlined in the recommendations.

However, the RTOs would face additional issues if the change was to be considered as non-equivalent.

## Scope of Project Overview

The RGR IRC does not believe that a project is required, and submits that this matter can be easily resolved by approval of the recommendations.

Should a project be required, the RGR IRC submits that due to the nature of the project, it can be completed within 6 months.

Commencement: July 2020

Submission to the AISC: December 2020

Timeline (Months)	Activity
Completed	Project planning and briefing, identification of experts and consultation with IRC
Not required	Workshops with subject matter experts including research and functional analysis
1	Development of draft documents in preparation for public consultation
2	Public Consultation
3	Validation and final draft process
3 – 4	Review of public consultation and Equity Review
4 – 5	Validation and Quality Assurance, final consultation for STA
6	Approval of Case for endorsement by IRC and submission to AISC

## Summary of Components

All work takes place within the RGR Training Package

### **Qualifications to be developed/revised:**

- One qualification to be reviewed
  - One qualification to be updated
  - No qualifications to be deleted
- No new qualifications to be created

### **Units of competency to be developed/revised:**

- No units to be reviewed
  - No units to be updated
  - No units to be deleted
    - Packaging rules will be adjusted for up to three units of competency
- No new unit to be created

### **Skill sets to be developed/revised:**

- No skill sets to be reviewed
  - No skill sets to be updated
  - No skill sets to be deleted
- No new skill sets to be created

*Table A (excel spreadsheet with full details separately submitted to the Department)*

# Project 2: Simplifying Certificate IV Qualification for Jockeys

## Description

The RGR IRC recommends the following change:

- RGR40218 Certificate IV in Racing (Jockey)
  - Remove the core unit BSBSMB303
  - Remove the core unit BSBSMB305

The RGR40218 Certificate IV in Racing (Jockey) would be reduced from 11 to 9 core units, with the elective units changing from 6 to 8 units.

## Rationale

The inclusion of *the two units, BSBSMB303 Organise finances for the micro business and BSBSMB305 Comply with regulatory, taxation and insurance requirements for the micro business* is preventing relevant RTOs offering the qualification and leading to difficulties for learners to complete the qualification. After considering feedback from RTOs and learners, and discussing the issue with all relevant Principle Racing Authorities, it is the view of the RGR IRC that these two units are unnecessary for jockeys and should not be core units in the qualification. The units have no relevance to participation in the thoroughbred racing industry as a jockey.

## IRC Recommendations

- That *BSBSMB303 Organise finances for the micro business and BSBSMB305 Comply with regulatory, taxation and insurance requirements* be removed from the core and be listed as electives in *RGR40218 Cert IV in Racing (Jockey)*
- That the *RGR40218 Cert IV in Racing (Jockey)* Packaging Rules be adjusted to require the completion of 9 core units plus 8 elective units (currently 11 core and 6 elective)

## Background

The qualification *RGR40218 Cert IV in Racing (Jockey)* superseded *RGR40208 - Certificate IV in Racing (Jockey)* after the completion of the first review in 10 years. The review took place during 2017/18, as part of the full review of the RGR Training Package.

The originally approved Review of the RGR Training Package project covered 16 qualifications and 132 Units of Competency, and additional work was added to address specific issues. The project, including the additional work, was conducted during a time when:

- There were incidents involving horse riding which led to an urgent requirement that the IRC review the Training Package with a view towards addressing major safety issues for RTOs
- There was a focus on ensuring that training related to horse breeding, formerly in the ACM training Package, were brought into the RGR Training Package to ensure integrity issues were addressed
- The greyhound industry faced major issues, including bans in some locations, which were either temporary or permanent
- The Training Package had not been appropriately reviewed for a decade and major changes were required

## Approved Changes to the Qualification

The RGR Training Package has been fully updated over the last three years and the IRC are monitoring any issues with implementation to enable the best and widest possible use of the Training Package.

The superseded qualification, *RGR40208 - Certificate IV in Racing (Jockey)*, consisted of 26 Core units and 3 Elective units. The work undertaken considerably reduced the complexity and requirements of the qualification, and the RGR IRC were primarily concerned to ensure that the updated qualification included all of the skills necessary for the job role of a jockey, as well as the improved safety requirements for training purposes.

The project also included a review of *RGR40308 - Certificate IV in Racing (Harness Race Driver)*, which also involved considerable simplification and changes to the qualification. The two relevant BSB Units of Competency were added to the updated *Certificate IV in Racing (Harness Race Driver)* as elective units.

The differential between the BSB units being core for jockeys and elective for harness drivers was not specifically identified as an issue for consideration at the time of the project.

The RGR IRC and the Principal Racing Authorities are not able to identify any reasonable rationale for this difference, and believe that making the proposed changes will further simplify delivery of the training. The proposed change will add consistency to these qualifications, and ensure that they both have core units that reflect the specific job roles of the participants, and have access to electives that enable participants to improve their business skills, if they choose to do so, through BSB units.

### **Issues with the BSB Units**

The two BSB units, *BSBSMB303 Organise finances for the micro business* and *BSBSMB305 Comply with regulatory, taxation and insurance requirements* do not reflect the job roles of jockeys. While they may contain useful knowledge in the long-term, they are not core to the requirement to participating in racing as a jockey. They include significant content that has no relevance to the job role of jockeys, who only operate as sole traders.

While there are many RTOs that have the relevant units on scope, there are very few currently offering these specific units and the RTOs working in the racing space have generally been unable to find partners to offer the units. The Racing-based RTOs do not have the relevant expertise to be able to offer the units directly due to the specialised nature of their offerings. A search by an IRC member was unable to locate an online provider of the Units, indicating that even if such courses exist, learners would be unable to locate them easily and arrange for their own enrolment.

### **Industry Regulation**

Racing and Breeding is a regulated industry and all participants who complete this qualification are required to meet the licensing requirements of the Principal Racing Authorities. These authorities consult with industry and make decisions concerning participation requirements.

Completion of *RGR40218 Cert IV in Racing (Jockey)* is recognised nationally as fulfilling the training requirements for licensing as a jockey, and licenses may also be granted where equivalent achievement to the qualification are achieved. The Principal Racing Authorities have agreed that the relevant BSB units are not required for industry participation and would not be considered in relation to equivalency when considering the issuing of a licence.

### **Industry Perspective**

The IRC does not believe that there is any impediment to changing the Packaging Rules relating to the qualification, and it would not have any impact on currently enrolled learners or on RTOs currently delivering the qualifications. The members of the IRC have directly undertaken discussions with the relevant RTOs and Principal Racing Authorities. There have been no issues with this proposal raised, and strong support from all industry participants.

## **Ministers' Priorities Addressed**

The project is designed to address an issue that arises from the implementation of training in a specific qualification. It does not directly address the current Ministers' priorities as these have been addressed in the major review of the RGR Training Package that has taken place over the last three years.

However, the project will assist RTOs to deliver training, and address potential issues relating to non-completion. It will also make one qualification smaller by two units, resulting in more efficient delivery.

## Consultation Plan

Due to the nature of this change, the RGR IRC submits that a shorter and more focused consultation can take place, if further consultation is required. The RGR IRC has already consulted Principal Racing Authorities about this change and there are no objections to this approach. The RGR IRC includes representation from the Australian Trainers Association and the Australian Jockeys Association, and no issues are foreseen. The RGR IRC has directly been in contact with the major RTOs with the training on scope and all are strongly in favour of the proposed change.

If a project is required, the RGR IRC believes that it can oversee the development process without the need for an SME Working Group or Technical Advisory Committee. Given the nature of the project the RGR IRC requests that the AISC approve a consultation plan, in which the changes are:

- Placed on the SSO website for public consultation for a period of 4 weeks, and during this period:
  - A notification is sent to thoroughbred and Harness participants in previous projects who have agreed to further contact concerning the change through email
  - The relevant ITABs in each state and Territory are directly contacted and invited to participate in the consultation or share the information with their networks
  - STAs are contacted for any feedback
  - All RTOs with the qualification on scope are directly contacted to advise of the change and seek feedback
- A short validation process is undertaken if the consultation identifies issues that need to be addressed
- The final training products proceed through the usual QA and STA processes
- Submission to the AISC for consideration

If this shortened proposal is accepted, the RGR IRC believes that the project can be completed in 2020.

## Other Relevant Information

The relevant qualifications and the unit RGRPSH310 were updated in July 2018. Further changes are required now to address implementation issues as outlined above.

## Scope of Project Overview

The RGR IRC does not believe that a project is required, and submits that this matter can be easily resolved by approval of the recommendations.

Due to the nature of the project, the RGR IRC estimates that this project can be completed within 6 months.

Commencement: July 2020

Submission to the AISC: December 2020

Timeline (Months)	Activity
Completed	Project planning and briefing, identification of experts and consultation with IRC
Not required	Workshops with subject matter experts including research and functional analysis
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## Summary of Components

All work takes place within the RGR Training Package

### **Qualifications to be developed/revised:**

- One qualification to be reviewed
  - One qualification to be updated
  - No qualifications to be deleted
- No new qualifications to be created

### **Units of competency to be developed/revised:**

- No units to be reviewed
  - No units to be updated
  - No units to be deleted
- No new units will be created

### **Skill sets to be developed/revised:**

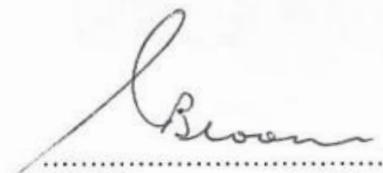
- No skill sets to be reviewed
  - No skill sets to be updated
  - No skill sets to be deleted
- No new skill sets to be created

*Table A (excel spreadsheet with full details separately submitted to the Department)*

# IRC Sign-Off

This IRC Skills Forecast and Proposed Schedule of Work was agreed as the result of a properly constituted IRC decision.

Signed for and on behalf of the Racing and Breeding IRC by its appointed Chair



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Geoff Bloom  
Chair, Racing and Breeding IRC  
Date: 3 / 5 / 2020