

ETU Response to Energy Safe Victoria's *Consultation on the requirements for the effective supervision of apprentice electricians*

11/04/2024

Opening Statement

The Electrical Trades Union of Victoria (ETU) welcomes the opportunity to provide feedback on Energy Safe Victoria's (ESV) consultation paper, entitled *Consultation on the requirements for the effective supervision of apprentice electricians*, and the draft copy of the proposed amendment *Requirements for the effective supervision of apprentice electricians*. As the sole representative of licensed electrical workers, the ETU has a significant interest in ensuring the integrity of the trade and, by extension, the skilled pathway that produces it.

As such we welcome this essential review of the efficacy and effectiveness of apprentice supervision. Broadly, the ETU is supportive of the draft policy as proposed by ESV, with a small number of key changes which are detailed below. The need to ensure adequate supervision of the next generation of licensed electrical workers is paramount to the future safety, security and stability of our energy system, and as such, we support any attempt to strengthen this essential education and employment pathway.

Detailed Response/s

Section 3.1 —Employer and supervisor responsibilities

1. Do you agree that the roles of the employer and the supervisor are distinct and that this should be reflected in the Apprentice Supervision Requirements?

ETU Position **Revise**

Comment

While we agree that the roles are distinct, we recommend that the final item of Section 4 (*Employers - your responsibilities*), sub-section 4.2 which lists the employer's responsibility to ensure that the supervisor 'is aware of their responsibilities and the requirements as outlined in this document' be amended to 'is **presented with a copy of this document and made** aware of their responsibilities and the requirements as outlined **therein**'.

2. Are the proposed roles and responsibilities of employers and supervisors as outlined in the draft updated Apprentice Supervision Requirements appropriate and clear? Do you have any suggestions to make them clearer?

ETU Position **Revise**

Comment

While we agree that the proposed roles and responsibilities are appropriate, we recommend that the requirements be extended to lineworkers, who are also licensed electrical workers. As such, we recommend that Section 5 (*'Supervisors —your responsibilities'*), sub section 5.3 which defines the term 'relevant electrical licence' to include an additional line item '• *if the apprentice is a lineworker, a Lineworker's Licence (class D, T, R or C) issued by Energy Safe Victoria under the Electrical Safety Act.*'

We understand that this may only be possible following an update to the regulations.

3. Do you believe that a supervisor is adequately qualified by holding a relevant electrical licence or should they be required to hold additional qualifications or undertake additional training? If the latter, what qualifications and/or training are necessary?

ETU Position **Revise**

Comment

We believe that the essential work of supervision should entail a level of appropriate training to be undertaken by potential supervisors. We recommend that Section 5 (*'Supervisors —your responsibilities'*), sub section 5.2 which describes the competency requirements of supervisors as being 'competent in the work being carried out by the apprentice they are supervising and hold a current relevant electrical licence' be amended to 'competent in the work being carried out by the apprentice they are supervising, **and** hold a current relevant electrical licence **and have completed an Supervisors Continuing Professional Development (CPD) course.**' Consequently, we also recommend that ESV develops such a CPD course, in consultation with industry, to be made available after 5 years of employment post-licencing.

4. Do you have any other comments regarding the approach to the roles and responsibilities of employers and supervisors for ensuring effective supervision?

ETU Position **N/A**

Comment

We have no additional comments.

Section 3.2 —Apprentice responsibilities

5. Do you agree with the proposed wording of the section in the draft updated Apprentice Supervision Requirements outlining the rights and responsibilities of apprentices?

ETU Position **Support**

Comment

N/A.

6. Are there any other responsibilities or requirements that should be imposed on apprentices?

ETU Position **Reject**

Comment

We believe no additional responsibilities or requirements should be imposed on apprentices.

Section 3.3 —Levels of supervision

7. Are the three levels of supervision as currently drafted appropriate?

ETU Position **Support**

Comment

N/A.

8. Do these levels of supervision provide employers, supervisors and apprentices with clarity around the supervision requirements?

ETU Position **Support**

Comment

N/A.

9. Is there sufficient differentiation between the three levels?

ETU Position **Support**

Comment

N/A.

10. Are the names appropriate, or would alternatives be preferred?

ETU Position **Support**

11. Is the concept of being "within visual contact and audible range (within sight and earshot)" a good gauge for a supervisor being in close contact with the apprentice? Is there a better alternative?

ETU Position **Support**

Comment

N/A.

12. Do you consider that these supervision levels are best suited for this document (and therefore represent a regulatory requirement), or would they better fit in general guidance?

ETU Position **Support**

Comment

N/A.

Section 3.4 —Supervisor to apprentice ratios

13. Do you consider this stated approach to be appropriate?

ETU Position **Support**

Comment

N/A

14. Do you have suggestions for the wording of the responsibilities of employers and supervisors?

ETU Position **Reject**

Comment

We have no additional suggestions.

15. Should we remove the requirement that a supervisor be adequately qualified in the role of supervisor or, alternatively, should we mandate that supervisors undertake identified qualifications or training? If the latter, what training or qualifications are necessary?

ETU Position **Reject**

Comment

As described in our response to Question (3), we recommend the development of a specific CPD course for supervisors to be required for all potential supervisors. We recommend this course only be available to licensed electrical workers who have 5 years experience post-license.

16. Do you have any other comments regarding the approach to ensuring supervisors are sufficiently capable of providing effective supervision?

ETU Position **Reject**

Comment

We have no additional comments.

Section 3.5 —Supervision requirements for higher risk work tasks

17. Are the conditions for carrying out isolation procedures and fault finding appropriate? Are they clear?

ETU Position **Revise**

Comment

While we agree that the conditions listed are broadly adequate, we recommend amended Section 9 (*Conditions for carrying out isolation procedures*) sub-section 9.1 to include '• *testing to confirm electricity supply pre-isolation*'.

18. Are there any other specific work tasks that should have conditions applied that are not already captured in the draft updated Apprentice Supervision Requirements?
- No.

Section 3.6 —Levels of effective supervision for specified types of electrical work

19. Does the Minimum levels of effective supervision table provide a useful approach to understand the supervision levels that are necessary for apprentice electrical workers?

ETU Position **Support**

Comment

N/A.

20. This table is currently noted as being "general guidance". Do you agree that it should instead represent a regulatory requirement, noting the importance of the competency assessments?

ETU Position **Support**

Comment

N/A.

21. Do you have any comments on the specific material in the table? Are the levels of supervision appropriate for the tasks identified? Should we identify additional work tasks for inclusion in the table and, if so, what should the supervision levels be for these tasks?

ETU Position **Reject**

Comment

We have no additional comments.

Section 3.7 —Other elements of this document

22. Should the flowchart for determining the level of effective supervision or the levels of guidance be included in the Apprentice Supervision Requirements?

ETU Position **Support**

Comment

We support the inclusion of the flowchart in the Apprenticeship Supervision Requirements.

23. Are there any elements missing from the draft Apprentice Supervision Requirements that you believe should be included?

ETU Position **Revise**

Comment

We recommend that our aforementioned suggestions be incorporated into the draft.

24. Do you have any feedback on the overall clarity, readability and understandability of the draft updated Apprentice Supervision Requirements?

ETU Position **Reject**

Comment

We believe that the clarity, readability and understandability of the draft is appropriate.