

15th April 2024

Leanne Hughson (She/Her) | Chief Executive Officer

Office of the CEO

Energy Safe Victoria

Dear Leanne,

NECA Victoria is fully supportive of the requirements for the effective supervision of apprentice electricians set out by ESV, where employers are responsible for apprentice training, safety, and supervision.

We are pleased that Energy Safe has taken the opportunity to engage with industry in this review, and we have encouraged our membership to participate in the review and survey.

While we believe that all parties involved in the employment of apprentices need to have a better understanding of the requirements, better education of all parties is needed. NECA is in the process of developing education programs for related parties, which we aim to involve and seek the support of Energy Safe Victoria.

The feedback from members of NECA has generally supported the review, however we also received some feedback which noted previously held concerns, these are centred around:

- The legal responsibility of the supervising electrician
- The ratio requirements for the supervision.

Below are some of the responses from our membership:

I would like to voice my concerns with reducing the ratio for direct supervision for first year apprentices. We do a lot of large civil works projects, which involve laying conduits and hauling mains cables. Laying conduits and hauling cable is labour intensive.

We start the first-year apprentices under our internal training program, laying conduit and getting an understanding of basic safety and product knowledge.

If the ratio changes, I can see this becoming a problem, if the general and broad is reduced.

I believe this would reduce the number of first year apprentices that we would hire.

Fault find can be difficult and challenging. Fault finding under supervision is a must. We as an industry are trying to train apprentices, so at the end of their apprenticeship they meet the requirements of a tradesperson. Currently we employ a lot of tradespeople, we are finding the young electricians we are hiring do not have the basic fault-finding knowledge or experience. The earlier they start under supervision the more compliant they will become. I believe over the last 5 – 10 years the level of competency at completion has dropped substantially.

Supervision Ratios: The proposed tightening of supervision ratios poses a direct challenge to maintaining our current apprentice employment levels. Given that our apprentice levels sit around 32%, the new ratios would inevitably lead us to reduce the number of apprentices we can support, counterintuitive to industry growth and development goals.

Qualification and Availability of Supervisors: The requirement that supervisors must be deemed competent in the apprentice's work area could potentially reduce the available pool of qualified supervisors. This restriction might limit apprentices' learning opportunities and complicate the assignment of supervisory roles within our organisation.

Logistical Challenges in Supervision: The logistics of assigning and reassigning apprentices to different supervisors, as necessitated by project demands and learning opportunities, could become significantly more complex. These challenges include ensuring continuous and effective supervision, managing supervisors' workloads, and maintaining detailed records of supervision activities.

Increased Administrative Burden: Complying with the new supervision requirements is expected to increase our administrative workload substantially. This includes more detailed documentation of supervision practices and competency assessments, potentially diverting resources from core operational activities.

Hiring and Retention Impact: The proposed changes could adversely affect our ability to hire and retain apprentices. Limitations on supervision could force us to make difficult decisions about apprentice numbers, affecting our contribution to the industry's workforce development and our operational capacity.

NECA considers that the supervisor ratios could be based on the concepts within the Tasmanian model, in that, the table included in the review paper is acceptable but should include a risk-based approach to ensuring that some tasks can have a greater ratio of apprentices to tradespeople.

While we understand the implied definition of fault-finding, if the reference to the Electrical Installation (Registration and Licensing) Regulations is made, this could also exclude certain levels of apprentices from some types of work, which, under direct supervision would be acceptable.

The requirement for the employer to “appoint supervisors who are responsible for providing effective supervision of apprentices, ensuring that the supervisor...”, NECA ideally seek a deeper explanatory note relating to this point to better understand the application. Additionally, what is the position of Energy Safe where an electrician refuses to become an “appointed supervisor”? we see this as a risk to the employment of apprentices by contractors and a potential challenge for the electrician.

We welcome the improved supervision guidance for the industry, to ensure that apprentices are adequately trained and work in a safe working environment.

Please contact me or Executive Director, Rob Selymes to arrange further discussions on this important industry issue, as required.

Regards,

Michael Weekes
Technical Manager