



**WATER SERVICES
ASSOCIATION OF AUSTRALIA**



**WSAA SUBMISSION TO NSW
DCCEEW'S COMPETENCY
BENCHMARK FOR LOCAL
WATER UTILITY
OPERATORS IN NSW**



WSAA submission to Consultation Paper: Competency benchmark for local water utility Operators in NSW

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Dear Josh,

Competency benchmark for local water utility Operators in NSW

The Water Services Association of Australia (WSAA) welcomes the opportunity to make a submission to your consultation paper and supports the approach undertaken by the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW). The Australian water sector faces a critical shortage of formally trained Operators, which is particularly pronounced in regional and remote areas. This shortage increases the risk of water safety incidents that could compromise public and environmental health. WSAA's forward looking data on capital expenditure shows a doubling of investment by 2027 to over 10 billion annually. This forecast investment will create even more demand for critical roles such as Operators, making attraction, retention and development a priority.

Despite being essential and critical workers, there are no requirements for water treatment, wastewater treatment or operations staff to have undertaken competency-based training. There is no clear definition of a 'qualified' Operator. WSAA believes that this needs to be addressed urgently to mitigate risks to customers and communities.

We congratulate NSW DCCEEW for your proactive approach to improving Operator capability by developing a competency benchmarking framework. This is necessary given the absence of national coordination and regulation, current skill shortages and the fragmentation of the training market.

WSAA's submission focusses on a national perspective and outlines key opportunities to support adoption and implementation, we also provide some minor suggestions for improvement.

The importance of a competency benchmark for Operators

WSAA believes that in the absence of national coordination and regulation, a NSW competency benchmark will:

- Improve access and quality of training delivered by registered training organisations (RTOs), to increase competency rates at a reduced cost
- Assist with capability gap analysis and mitigation of risks to public health
- Reduce training material development costs through economies of scale
- Help facilitate the attraction and retention of staff and portability and transfer of skills
- Provide a foundation that will help facilitate improved remuneration and conditions
- Provide greater transparency for RTOs to enter the market
- Assist with facilitating funding and advocacy opportunities
- Positively influence units within the National Water Package (NWP) and reduce instances of duplication
- Provide other State and Territories with possible approaches to replicate.

Key barriers impacting attraction, retention, and development

The shortage of formally trained water Operators has several causes, which together result in a poorly functioning water operations training market. The causes include (NSW Government, 2022):

- The lack of any mandatory requirement for water Operators to complete accredited training or hold qualifications
- Low uptake of available national accredited water operations training
- Difficulty attracting new Operators to water utilities, and retaining existing skilled Operators, particular in regional and remote Australian communities.
- Few registered training organisations offer water operations training
- Shortage of accredited trainers, and lack of pathways for existing trainers to maintain training and technical skills.

Other barriers include:

- Funding subsidies differ markedly across jurisdictions, as does the capability to budget and coordinate training
- Requirements for RTOs are not clear and/or are not clearly communicated, resulting in RTOs being reluctant to enter the market
- A lack of consistency in competency assessments for Operators, and water corporations are duplicating training resources

- Water utilities are allocating resources to responding to increased extreme climatic events (e.g. bushfires, floods, storms), making it more difficult to allocate resources to manage changing regulatory expectations.

Opportunities for consideration

While WSAA is supportive of the approach undertaken by NSW DCCEEW, we recommend the following opportunities are considered to enhance the outcomes of the competency benchmark framework:

1. National collaboration
2. Funding for smaller NSW utilities
3. Promoting a Career in Water
4. Improving visibility
5. People productivity
6. Additional analysis of Operator shortage and capability gaps
7. Influencing the National Water Package
8. Competency benchmarks for other skills sets and roles
9. First Nations support
10. Further sector-wide consultation will be required.

WSAA recommends that these opportunities are used to develop critical success factors for implementation.

1. National collaboration

Overarching principals should be developed that promote national standardisation but not limit improved levels of competency. Training resources should be leveraged and harmonised, with costs reduced through economies of scale. WSAA encourages collaboration with other States and Territories.

Example 1 - Queensland

The QWRAP Program is a joint initiative between the Queensland Government, LGAQ and *qldwater* which assists Local Government water service providers across Queensland to collaborate with the aim of better managing water services and infrastructure across the state. This model is already proving to be successful and could be adopted by NSW.

In Queensland, without funding for subsidised training, minimum standards of competency would be difficult to meet. While QWRAP delivers training efficiencies, it is the level of direct government support for training in essential services like water that is significant. Water funding for councils has also been extended on an ongoing basis. For further details refer to:

<https://statements.qld.gov.au/statements/94120>

Example 2- Victoria

The VicWater Workforce Readiness Project and their proposed Training Academy presents an opportunity for national collaboration around the following outcomes:

- Delivery of NWP Certificate III and IV suite of courses
- Nationally accredited curriculum
- An apprenticeship or training system that is aligned with and supported by federal and state funding
- Short and refreshed courses
- Career paths for Operators to become trainers and competency assessors and connection to the sector that promotes water careers and retention of staff to STEM opportunities through pathways to universities.

In addition, four training cells to support standardisation and mutual aid will be developed. This aims to reduce duplication, costs and create a sharing network of Operators to foster innovation and problem sharing.

2. Funding for smaller NSW utilities

WSAA considers a key barrier to implementation is funding and coordination for smaller NSW utilities. WSAA calls for appropriate support to be in place from Governments to allow all service providers to reach agreed benchmarks. Appropriate timeframes for adoption should also be implemented.

Consideration should be given to maximising funding available through NSW Smart and Skilled, by aggregating fundamentals training under a Certificate II and advanced training under a Certificate III. This would allow an Operator to have up to 22 units of competency, satisfying the need of some Operators with water, wastewater and networks under their operating role profile.

3. Promoting a Career in Water

WSAA in collaboration the Australian Water Association and other stakeholders including NSW Water Directorate, have developed an industry campaign to promote attraction and retention of key talent (refer to www.careersinwater.com.au). Operators are identified as one of the key targeted talent segments for the national campaign. WSAA recommends continued promotion and adaption of content to market conditions and, through Careers in Water, development of educational resources and mentoring programs.

In addition, sector collaboration and advocacy on key national opportunities such as skilled migration would help improve the attractiveness of our labour market.

4. Improving visibility

Water and Wastewater Operators are not adequately reflected in the National Skills Priority List and in the ANZSCO codes. Leveraging competency benchmarks is an opportunity to improve visibility and transparency. This may support advocacy and funding opportunities. WSAA calls for improved sector collaboration to better reflect critical roles.

5. People productivity

Optimising time to competency should be a key factor in the framework. The optimum mix of face-to-face, remote training delivery, and emerging new technologies must be considered. For example, WSAA is delivering an Artificial Intelligence Adaptive Learning Project with an initial focus on falls prevention. Early results and feedback are extremely positive. Future modules could be expanded to Operator training. However, Operators need solid 'hands-on' skills which reinforce the need for regional training centres such as the above-mentioned VicWater Training Academy.

6. Additional analysis of Operator shortage and capability gaps

There is a lack of national understanding of the Operator shortage and capability gaps. This has significant implications for national risk management and how jurisdictions fund, coordinate and plan the training delivery. The newly formed Building Construction and Property Jobs Skills Council (operated by BuildSkills Australia) could play a vital role in assisting the sector improve reporting and transparency. For instance, BuildSkills Australia could manage a National Water Sector Snapshot extending the example *qldwater* has set over the last decade:

https://qldwater.com.au/workforce_composition_snapshot_reports

7. Influencing the National Water Package (NWP)

The current NWP does not effectively address the needs of local water utility Operators. WSAA agrees that the packaging rules have very few mandatory units of competency and allow significant flexibility in the choice of elective units. In addition, the units lack the granularity required and there are some areas of duplication within units. This results in inconsistent training delivery across the state and no clear definition of a 'qualified' operator.

There is also no direct reference in the NWP to the protection of public health and a lack of promotion of the critical role of Operators. This has a negative impact on the value of the role of Operator and is a barrier to attraction, retention and remuneration.

8. Competency benchmarks for other skills sets and roles

Prioritisation of a competency benchmark for Operators is appropriate given current capability gaps and public health risks. There is a wider opportunity to develop similar benchmarks for other critical roles such as engineers.

9. First Nations support

WSAA strongly supports First Nations values and involvement in water management (WSAA submission to Productivity Commission's Interim Report National Water Reform 2024). Furthermore, WSAA emphasises the need for training to be culturally sensitive. A competency benchmark for Operators also presents an opportunity to build the capability of First Nations Operators and attract and retain First Nations people. This is particularly important in regional and remote roles.

10. Further sector wide consultation will be required

WSAA acknowledges that the competency benchmark has been specifically developed for local water utilities and that it is not intended at this time to apply to large public utilities or private water Operators. Local water utilities typically require their Operators to develop skills across water treatment, wastewater treatment and sometimes network operations. Large utilities (e.g. within NSW such as Sydney Water and Hunter Water) require their Operators to develop specialist skills within water treatment, wastewater treatment or network maintenance and operations. Obviously this requires a different mix of national Units at both entry and advanced levels which can be accommodated through the large elective pool of Units. However, the competency benchmark has

other elements that remain consistent regardless of the size of the utility, namely industry induction, safety training required to ensure compliance with the WHS Act 2011 and fundamental operations training. Any proposal about adopting online training leading to industry certifications such as the “aqua card”, “brown card”, “green card” or a “water industry safety card” should formerly consult the whole water sector, not just local water utilities.

Feedback on consultation paper

While WSAA is supportive of the competency benchmark outlined in the consultation paper, we propose the following minor suggestions for improvement.

- 1) The proposed model outlined in Figure 1 (reproduced below) indicates that completing ‘Fundamental operations’ an Operator would be required to complete ‘Water fundamentals’ or ‘Wastewater fundamentals.’ WSAA contends that for some roles both water and wastewater fundamentals will be required and there should be flexibility introduced to account for this. Flexibility in the competency benchmark should also be provided for treatment specialists in large utilities to specialise without having to do any required network units. This will minimise the units for advanced Operators.



Figure 1 Local water utility operator competency benchmark

An Asset test should be applied so that an Operator is not required to undertake units of competency that are not applicable to them or their organisation. There should be enough flexibility in the framework to align units of competency to infrastructure, recognising that the Operator is ‘competent’ to work on all plant that has that corresponding technology within it.

- 2) The approach should not impact the portability of skills. However, in some remote or regional settings where there is a shortage of Operators, the breadth of units should be considered. Where

Operators have neighbouring networks with differing assets, there may be an opportunity for an Operator to consider additional units, so they are able to work if needed.

- 3) WSAA recommends that a survey of Operators is conducted to determine the balance of training materials developed and units of competency that should be completed. Data could be collected and accessible locally and nationally, held in a system that is accessible at all levels, with appropriate permissions and de identified data (where appropriate) in place for an individual, employer and State and Federal Governments. This need was highlighted as a recommendation in a report commissioned by *qldwater*, produced by the Balmoral Group.

- 4) WSAA Members have a significant focus on fatal risk (refer to WSAA Fatal Risk Guidelines). WSAA would recommend that required safety training includes a fatal risk focus.

WSAA endorsement

WSAA endorses the DCCEEW Competency benchmark for local water utility Operators in NSW. There is an urgent need to mitigate public health risks through improving the capability of our essential Operators. WSAA recommends that NSW DCCEEW consider WSAA's feedback on the consultation paper and opportunities that will enhance outcomes.

Contact

WSAA welcomes the opportunity to discuss this submission further.

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