

BSBWHS515

LEAD INITIAL RESPONSE TO AND INVESTIGATE WHS INCIDENTS

WORKBOOK

Participant name	
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FOR THE PARTICIPANT

Instructions

- You will complete written activities as outlined on the following pages. You must attempt all questions and provide enough detail in your responses to demonstrate your knowledge.
- The timeframe for these tasks will be established by your Assessor or Training Provider. Additional time may be allowed upon negotiation with the Assessor.
- You must complete all questions unless instructed otherwise by the Assessor or other personnel. You may refer to reference material as needed. All questions must be answered correctly for a 'Satisfactory' assessment outcome to be awarded.
- An oral examination may be allowed under certain circumstances, whereby your answers will be documented by another party.
- If any written questions are incomplete, or not answered satisfactorily, you will need to complete them again after further training support.
- If you answer a question incorrectly but modify your response, put your initials next to the written change (or the Assessor must initial a verbal change).

Resources required

Pen

FOR THE ASSESSOR

Instructions

- Where oral examination has occurred, ensure that this is acknowledged in writing (e.g. FT001 and Assessor Comments)
- All questions must be satisfactorily demonstrated by the Participant for a Satisfactory determination (indicated by an Assessor tick to the right of the question).
- Assessors are to complete marking in pen of a different colour to the Participant.
- If the Participant verbally modifies their response, write in the modified response verbatim and put your initials next to the written change.

ASSESSOR COMMENTS

As necessary, outline:

- Details on reattempts, alternative arrangements or reasonable adjustments made.
- Where a Participant is deemed 'Not Satisfactory', provide recommendations for future training.

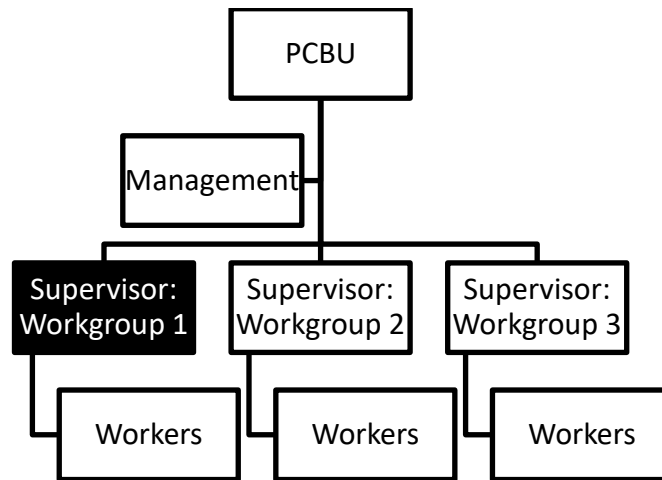
NOTE

At times, you will be provided with a specific business context to which you must respond, otherwise it is anticipated that you will use a workplace of your choosing (your own, or hypothetical) to provide the context to the task.

At all times, the responses in your assessment must reference **Australian** (Queensland or Federal) documentation, including legislation, regulations, codes of practice, standards and guidance publications. For example, in Queensland refer to

<https://www.worksafe.qld.gov.au/>

For the following activities, you will assume the role of a workgroup supervisor in a workplace of your choosing (see example organisational chart below).



Name a workplace and workgroup that you are (or hypothetically are) the supervisor for. Also, identify a likely incident to occur within this workplace which requires investigation. It may have actually happened or could hypothetically happen.

Name of workplace	Construction Skills Training Centre (CSTC)
Workgroup	Resource Development
Describe incident	Students completing a concreting task outside were using chemicals in the workshop area which were wafting into the office area. The chemical smell was causing headaches/nausea for office staff, including pregnant individuals.

ACTIVITY 1

Consider the initial responses to the incident, in preparation for an investigation:

- a) How would you ensure the incident site is safe and secure?
 - Describe how you would address the immediate needs of those involved in the incident
- b) Outline the WHS legislative requirements for your workplace regarding incident response (i.e. duty holders, notification/reporting, recordkeeping, preserving incident sites) as outlined in:
 - WHS Acts
 - WHS Regulations
- c) Outline your workplace's requirements regarding incident response (including consultation requirements) as outlined in:
 - Organisational response plan/process
 - Policies
 - Procedures
 - Systems

Ensuring safety and security of site

As office personnel had presented with ill-feeling, these staff were directed to leave the office area. The pregnant individuals were directed to go home for the day. The class was directed to stop using the chemical, but this task had already concluded.

In terms of ensuring the site was secure, the students were directed to leave their equipment as is, including the chemical in question, to be examined by the HSR.

WHS Acts

PCBU:

- Section 19 of the *Work Health and Safety Act 2011* (Qld) provides that in holding the primary duty of care the PCBU should ensure, so far as is reasonably practicable, the health and safety of workers affected by the business or undertaking.
- This would extend to responding to incidents (e.g. providing first aid and responding to emergencies), investigations and implementation of risk control measures.

Workers:

- Section 28 of the *Work Health and Safety Act 2011* (Qld) provides that workers:
 - Comply, so far as they are reasonably able, with any reasonable instruction given by the PCBU to allow the PCBU to comply with WHS laws, and
 - Cooperate with any reasonable policy or procedure of the PCBU relating to health or safety at the workplace that has been notified to workers (e.g. implement risk controls as specified by the PCBU).
- This would extend to responding to incidents (e.g. providing first aid and responding to emergencies), investigations and implementation of risk control measures.

Notification and site preservation:

- Sections 35-37 outlines the types of incidents that require notification.
- Section 38 requires the PCBU to keep a record of each notifiable incident for at least 5 years from the day the notice is given to the regulator
- Section 39 outlines the duty on those who manage or control a workplace to preserve sites where incidents occur.
- As this was not a notifiable incident and was not an emergency situation, only internal personnel needed to be informed (i.e. management and HSR).

WHS Regulations

Regulation 711 of the Work Health and Safety Regulation 2011 (Qld) outlines that a relevant person must ensure that the regulator is notified immediately after becoming aware that a notifiable incident has arisen.

Regulation 712 outlines that a PCBU has a duty to preserve the site of a notifiable incident.

Response plan/process

Section 3.6 of CSTC's Safety Management System – Policies and Procedures manual outlines that any incident must be reported to the Operational Executive Team (CSTC) and CSTC's Health and Safety Advisor. Further, in the event of a notifiable incident WHSQ must be made aware.

Section 3.7 outlines that investigations shall be completed by suitably qualified and trained personnel and that a report must be completed for all incidents.

Section 3.7 outlines that a written investigation report must be completed for all incidents resulting in serious injury or illness and/or dangerous incidents.

Policies

Sections 2.3 and 2.7 of CSTC's Safety Management System – Policies and Procedures manual identify that managers and workers, respectively, must report on all incidents or 'near misses'.

Procedures

Section 3.6 of CSTC's Safety Management System – Policies and Procedures manual outlines that in the event of a notifiable incident, WHSQ must be made aware within 24 hours.

Section 3.7 outlines that all incidents shall be investigated to determine the cause as a precursor to the implementation of remedial action to prevent a similar occurrence.

Section 3.7 outlines that reports should be made on FS004 – Incident Report Form. The Managing Director must review and sign off on the report. Further CSTC's Incident Investigation Procedures (FS028) outlines the required tasks to be undertaken for an investigation.

FS028 Section 4 outlines that the Managing Director shall ensure that all incidents are investigated and actioned. The Health and Safety Advisor will notify WHSQ of notifiable incidents, as well as review all incident reports to identify trends. FS028 Section 5.1 outlines that incidents must be reported to the Health and Safety Advisor ASAP and reports completed within three days (to be kept for a minimum of five years).

FS028 Section 5.4 also outlines the objective of incident investigation and first response measures.

Systems

CSTC's Safety Management System – Policies and Procedures manual outlines how incident reporting and recording fits within the general Safety Management System and procedures.

**Satisfactory
Outcome**



ACTIVITY 2

You are required to develop an investigation plan to address the incident:

- a) Define the scope and purpose/objectives of the investigation
 - Ensure this reflects the scope and nature of the incident
 - Explain which individuals/parties have a duty to be involved/consulted, according to legal and workplace policies, procedures and systems
 - Identify any expert advice that may be required
- b) Outline the requirements of the investigation in the form of an action plan
 - Identify resourcing requirements, and allocate roles and responsibilities
 - Prioritise tasks and specify timelines for the investigation
 - Identify how the outcomes of the investigation will be documented in order to meet organisational and legal requirements
- c) Identify factors that may impact on the investigation and how they might be addressed. Consider the impact of:
 - Workers with specific needs and limitations (e.g. cultural background and diversity, low language, literacy and numeracy levels)
 - Structure and organisation of the workforce (i.e. part time vs casual vs contract workers; shift rosters; geographical location)
 - Commercial requirements (e.g. need to continue working)
 - Necessity for ensuring privacy throughout the investigation

Ensure that the requirements from Activity 1 are met through your responses to Activity 2.

Scope and purpose/objectives of the investigation

As the nature of this incident is able to be easily defined (i.e. it was obvious what the influencing factors were), only a small investigation needs to be undertaken. As such, a limited number of parties would need to be involved (e.g. HSR, management, workers/students in question).

In planning the investigation procedure, the PCBU and HSR should be involved in order to address organisational and legislative requirements (sections 47 and 48). If the chemicals in question had been combined with others, a toxicologist may need to be consulted as well. However, this was not the case in this scenario.

Action plan

- Task: Undertake investigation of chemicals causing ill-feeling within the office area.
- Resourcing requirements (Equipment): PPE, notepad and pen, computer
- Resourcing requirements (People): HSR (also acting as First Aid officer), PCBU
- Resourcing requirements (Financial): Loss of production costs (e.g. evacuated office staff, delays in class time). All other equipment and personnel are internal.
- Role/responsibility: HSR to investigate source of smell, implement safety measures, document findings.
- Timeframe: Due to the undisclosed nature of the chemical and the presence of pregnant individuals, this should be addressed ASAP. The priority would be the pregnant individuals and other affected individuals (e.g. attending to their needs, and gathering information from them before they depart).
- Documenting outcomes: Findings to be documented (e.g. incident report form) and presented to PCBU within three days

Impacting factors

Factors that may impact on investigations, include:

- Problems within policies, procedures, processes and systems with regards to how investigations are undertaken (e.g. there may be a conflict of interest). In the event of management being involved in an investigation (which may make a worker feel as though they are being judged and thus not be as forthcoming with information), care could be taken to involve management from a different work area. There should also be assurance that information gathered will be handled privately, so that workers feel free to be forthcoming with information.
- Low language, literacy, numeracy and communication skills of those involved. This may include those who are undertaking the investigations or those who are being interviewed. Care must be taken to ensure that people conducting interviews are appropriately selected based on their skills and abilities. Those being interviewed may have their language issues supported by an interpreter.
- Cultural background and diversity may influence the types of responses gained during investigations. These should be addressed on a case by case basis, depending on the cultural needs of those involved.
- Structure and organisation of the workforce (e.g. availability of workers due to part-time, casual, contract workers; shift rosters; geographical location). This may be problematic, particularly when conducting interviews, as people may be unavailable or inaccessible. Management need to take a strong role here, providing sufficient timetabling so that interviews can be undertaken in the most efficient way possible.
- Commercial requirements: Investigations need to be timely to ensure that the business can continue to operate in order to meet their obligations to clients – not removing areas/equipment/personnel from action for too long and addressing any issues

**Satisfactory
Outcome**



ACTIVITY 3

Consider the collection and analysis of information and data:

- a) Explain why and how you will inspect the incident site.
- b) Explain why and how you will inspect the equipment used at the time of the incident.
- c) Identify other evidence you would gather regarding the incident.
- d) Outline how you would gather information and data in ways that ensure objectivity, confidentiality, validity, admissibility and accuracy.
- e) What reasoning would you give to the investigation team to justify the following approaches during the analysis:
 - Adopting an open-minded and objective approach
 - Analysing policies, procedures, processes and systems in place at the time of the incident
 - Active listening
 - Focussing on the 'how', 'what' and 'why' of the incident
 - Not focussing on individual behaviour or fault
 - Using applicable models of causation and occurrence
- f) Identify the benefits of presenting numerical information/data using graphs

Ensure that the requirements from Activity 1 are met through your responses to Activity 3.

Inspecting the incident site

The incident site should be examined to get an accurate picture of the environment and the tasks undertaken at the time of the incident.

As much evidence as possible must be gathered as close to the time of the incident as possible, in case the details change. The investigation team should be physically present to make direct observations (e.g. affected parties, unusual circumstances, and the work environment). It may be useful to take photographs to support written records.

Inspecting equipment

Equipment should be examined to get an accurate picture of the tasks undertaken at the time of the incident.

As much evidence as possible must be gathered as close to the time of the incident as possible, in case the details change (e.g. equipment is serviced and put back into use). The investigation team should be physically present to make direct observations (e.g. observing current/past damage on equipment, checking fluid levels, identifying barricades in place, observing unusual circumstances and checking the work environment). It may be useful to take photographs to support written records.

Other evidence

It would be useful to collect records of similar incidents that have occurred. The PCBU is obligated to keep records of such incidents. It is important to determine if there are trends with the incident in the workplace, to determine if current risk control measures are working or not. You may supplement the workplace specific information through statistics about particular types of incidents.

Process for gathering information and data

To ensure objectivity:

- Ask suitable questions that look at the incident, rather than direct responsibility/blame
- Avoid leading witnesses (i.e. interviewers or translators)

To ensure confidentiality:

- Interviews should be conducted in a private environment
- Keep evidence and records in a secure location, avoiding the possibility of tampering
- External parties involved should sign confidentiality agreements

To ensure validity, admissibility and accuracy:

- Investigation should be conducted as soon as possible after the incident has occurred
- Sources should be direct (i.e. not hearsay)
- Investigation findings (e.g. interviews) should be carefully documented

Briefing the investigation team

- Adopting an open-minded and objective approach ensures that all evidence is collected in an accurate manner, as opposed to a particular agenda being pursued (at the sacrifice of discovering other, less obvious, root causes).
- Analysing policies, procedures, processes and systems in place at the time of the incident may uncover systemic issues as to why the incident was caused. Those involved in the incident may have been following instruction perfectly, but the instruction was flawed.
- Active listening will ensure that you get the most out of your interviews. Pay attention to the speaker's body language to determine how to address them. Show that you're listening and that you are engaged in what they are saying. Provide feedback by asking further questions or clarification.
- Focussing on the 'how', 'what' and 'why' of the incident. This will focus on what has happened objectively, not individual behaviour or fault and will provide open ended responses, avoiding a yes/no response.
- Not focussing on individual behaviour or fault will mean that witnesses are more forthcoming with information – as they don't feel like they are being blamed.
- Using applicable models of causation and occurrence will ensure that a systematic examination of the incident occurs and that possible root causes are narrowed down to the actual root cause.

Presenting information

Using graphs to present information can allow for trends to be identified (e.g. increasing numbers of incidents). This can pinpoint the impact of a change.

**Satisfactory
Outcome**



ACTIVITY 4

Complete an investigation report of the identified incident for your PCBU in the following structure:

1.0 INTRODUCTION

- Outline the background of your company, its role and purpose
- Briefly describe the incident that has taken place
- Define the scope and purpose of the investigation

2.0 INVESTIGATION FINDINGS

- Construct a timeline of events leading up to the incident (e.g. who was involved, what happened, initial responses to meet legislative/organisational requirements)
- Describe the scope of the investigation (e.g. identify investigation team, sources of information and data, site/equipment inspections that took place, other evidence gathered, experts consulted)
- Outline how information and data was gathered using objective, confidential, valid and accurate methods.
- Highlight the root causes of the incident:
 - Note the key events, conditions and/or circumstances that together resulted in the incident
 - Consider the effectiveness of workplace policies, procedures, processes and systems

3.0 RECOMMENDED PREVENTION MEASURES

- Highlight points at which the incident could have been prevented
- Outline actions, interventions and practical measures that would prevent reoccurrence of the incident, which address the root causes identified
 - Evaluate between alternative strategies to identify the best option(s) for the workplace, identifying the criteria used for this decision
 - Identify resourcing requirements, and allocation roles and responsibilities
 - Prioritise tasks and specify timelines for implementation
 - Outline how the effectiveness of these solutions will be measured and evaluated

4.0 CONCLUSION

- Explain the importance of WHS to your company, and the value of addressing and avoiding incidents

TIPS:

- Use the report template (below) and elaborate on the points above.
- Write in simple English. Remember that people from a range of backgrounds and abilities would be reading this document.
- Be sure to reference evidence to back up your conclusions and recommendations, providing sufficient detail so that the reader can look into it further.

2.0 INTRODUCTION

CSTC is registered training organisation which endeavours to provide training for workers in the building and construction industry. CSTC strives to be recognised as a learning centre of excellence for vocational education and training.

As part of recent assessment for concreting students, chemicals were used and their fumes moved into the main office area. Two pregnant workers were exposed and other members of staff started to feel ill.

In meeting the requirements of the Work Health and Safety Act 2011 (Qld) and CSTC's policies and procedures (FS001 and FS028), an investigation took place with the Health and Safety Representative (HSR) leading the process.

2.1 INVESTIGATION FINDINGS

A timeline of events leading up to the incident can be summarised as follows:

- July 4 2014 11:30am: Concreting class moved indoors as rain started. Chemicals were being used, under the direction of the class' trainer.
- July 4 2014 12:00pm: Fumes were noted by some staff members and office doors were locked to avoid exposure.
- July 4 2014 12:30pm: Staff members went to lunch, moving out of the office area. Use of chemical ceased by this time.
- July 4 2014 1:00pm: Staff returned to office and fumes had not dissipated. First Aid Officer and HSR directed pregnant individuals to go home for the day, as approved by management.
- July 4 2014 1:30pm: Other staff members reported headaches and nausea. These staff members were directed to go outside. Office doors were opened to flush out the fumes.
- July 4 2014 2:00pm: Staff members returned to office to return to work.

As a result of this incident, an investigation took place in line with section 19 of the Work Health and Safety Act 2011 (Qld), Section 3.7 of CSTC's Safety Management System – Policies and Procedures manual and CSTC's Incident Investigation Procedures (FS028), with the HSR leading the process:

- The trainer of the class was objectively interviewed by the HSR in a private area. This was a matter of urgency, as the trainer in question was a contractor and not regularly available at the workplace. The trainer explained that rain had caused the class to move indoors.
- The workshop area where the class work was conducted was examined. It was noted that the area was closed off to avoid rain entering the workshop, but this had caused the fumes to flow into the next available space – the office area.
- The chemical in question was noted and its Safety Data Sheet examined to determine the nature of the injuries it can cause. Its effects were limited to those experienced by affected staff (i.e. headaches and nausea).
- A confidential incident report form (FS004) was completed by the HSR before the close of business and was lodged with management, as per FS028 Section 5.1.

Investigation findings:

- It was determined that this chemical, when used outdoors in a normal class setting, does not cause ill-effects for those exposed as fumes can easily dissipate. The closed nature of the workshop caused the fumes to seem concentrated. Combined with the proximity of the work to the office space, this caused ill-effects on the day of the incident.
- It was also flagged that the lack of direction/procedure about classwork during inclement weather may have been a factor.

2.2 RECOMMENDED PREVENTION MEASURES

The HSR and management determined that assessment tasks involving the use of chemicals should not be conducted in a non-ventilated area. In future, when such tasks are affected by inclement weather, they should cease and only resume if they can be conducted outside. Despite claims that the chemical in question should not be used at the premises again, this would not prevent incidents where other chemicals are used in non-ventilated areas. No additional resourcing is required, unless inclement weather continues for an extended period and tasks cannot be completed until a later date, in which case trainers would need to be organised accordingly by management.

Such procedures would explained to trainers (employees and contractors) by the Training Manager as a matter of urgency. The HSR would continue to monitor its implementation and report any infringements to management.

2.3 CONCLUSION

As part of CSTC's aim of being a centre of excellence, CSTC not only trains students about the importance of WHS, but also ensures that it practices what it preaches. As outlined in the legislation, CSTC (as a PCBU) and its workers have duties to ensure that workplace health and safety is recognised - and each party has a role in upholding it.

As part of maintaining compliance, CSTC reviews its policies and procedures annually and ensures that all members keep abreast of changes. CSTC addresses staff training needs and provides training as required. As such, CSTC ensures the highest level of safety in the workplace.

**Satisfactory
Outcome**



BSBWHS515 LEAD INITIAL RESPONSE TO AND INVESTIGATE WHS INCIDENTS

QUIZ

Participant name	
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FOR THE PARTICIPANT

Instructions

- You will complete written questions as outlined on the following pages. You must attempt all questions and provide enough detail in your response to demonstrate your knowledge.
- It is anticipated that you should complete this assessment within one hour, but additional time may be allowed upon negotiation with the Assessor.
- You must complete all questions unaided by the Assessor or other personnel but may refer to reference material as needed. All questions must be answered correctly for a 'Satisfactory' assessment outcome to be awarded.
- An oral examination may be allowed under certain circumstances, whereby your answers will be documented by another party.
- Any written questions that are incomplete, or not answered satisfactorily will need to be completed again after further training support.
- If you answer a question incorrectly but modify your response, put your initials next to the written change (or the Assessor must initial a verbal change).

Resources required

Pen

FOR THE ASSESSOR

Instructions

- Where oral examination has occurred, ensure that this is acknowledged in writing (e.g. FT001 and Assessor Comments)
- All questions must be satisfactorily demonstrated by the Participant for a Satisfactory determination (indicated by an Assessor tick to the right of the question).
- Assessors are to complete marking in pen of a different colour to the Participant.
- If the Participant verbally modifies their response, write in the modified response verbatim and put your initials next to the written change.

ASSESSOR COMMENTS

As necessary, outline:

- Details on reattempts, alternative arrangements or reasonable adjustments made.
- Where a Participant is deemed 'Not Satisfactory', provide recommendations for future training.

Q1. Which of the following circumstances are considered as initial responses to incident? Tick all that apply.

Answer	Choice	Possible Answers	☐
	✓	First aid	
		Evaluation of response	
	✓	Preserving the incident site	
	✓	Evacuation	

Q2. True or False (Tick your response): 2. Under Part 3 of the *Work Health and Safety Act 2011 (Qld)*, a PCBU must notify Work Health and Safety Queensland about all incidents that occur in the workplace, even if there is no injury or damage caused.

Answer		True	☐
	✓	False	

Q3. Which of the following should be considered when developing an investigation plan? Tick all that apply.

Answer	Choice	Possible Answers	☐
	✓	WHS legislation	
	✓	Workplace policies, procedures, processes and systems	
	✓	Appropriate selection of a team for the scope of the investigation	
	✓	Delegation of suitable tasks to investigation team members, based on their background or skills	
	✓	Consultation and participation of individuals/parties with planning	
	✓	Obtaining necessary resources for investigation, including expert advice	

Q4. Which of the following factors would be considered barriers to an incident investigation? Tick all that apply.

Answer	Choice	Possible Answers	☐
	✓	Availability of witnesses due to organisational structure (e.g. casual employees, shift work)	
	✓	Differences in understanding due to diversity (e.g. cultural background, low language, literacy and numeracy levels)	
	✓	Attitudes of investigators (e.g. negative views of opposite gender)	
	✓	An extended time passing since the incident occurred	

Q5. Identify two (2) tips for good listening. Tick two (2) that apply.

Answer	Choice	Possible Answers	☐
	✓	Provide feedback to show you have interpreted the information correctly when the talker has finished.	
		Interrupt as you have questions. Do not wait until the end.	
	✓	Take notes if the information is complex or exact details are required.	
		Just listen. Don't take note of non-verbal cues.	

Q6. Match the following causation models and their descriptions by writing the appropriate letter next to each number in the centre column.

Answer	Causation Model	Answers	Description	☐
1	Complex linear	1 - B	A Series of events or circumstances which interact sequentially with each other. Incidents are preventable by eliminating one of the causes in the sequence.	
2	Complex non-linear	2 - C	B Incidents are a result of combination of unsafe acts and hazard conditions which sequentially interact.	
3	Simple linear	3 - A	C Incidents result from a combination of interacting variables, sometimes seemingly unrelated.	

BSBWHS515

LEAD INITIAL RESPONSE TO AND INVESTIGATE WHS INCIDENTS

PRACTICAL ASSESSMENT

Participant name	
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FOR THE PARTICIPANT

Instructions

- The tasks outlined on the following pages will require performance of normal workplace activities, as a result of a structured activity set by an Observer in the workplace or a simulated activity set by your Assessor/Observer.
- The timeframe for these tasks will be established by your Assessor/Observer in consideration of location conditions and industry requirements.
- You must complete all tasks assisted by the Assessor or other personnel, unless the supervisor notes assistance.
- You must attempt all tasks (and itemised steps) for a 'Satisfactory' assessment outcome to be achieved.
 - For an observation conducted that is incomplete, or without satisfactory performance, the observation will need to be completed again after further training support.

FOR THE ASSESSOR/OBSERVER

Instructions

- The following observation record should be used to judge and record your observations of the Participant as they complete the task(s) set. You must record your observations of the Participant's performance.
 - For each occasion, indicate the task performed and whether it was a simulation or workplace-based task.
 - Any simulated assessment must ensure the Participant still performs under workplace conditions which reflect industry standards.
 - In the comments, provide clear detail regarding the task that the Participant was required to do (e.g. PPE used, materials handled, attachments connected, plant types).
- All steps must be satisfactorily demonstrated by the Participant for a 'Satisfactory' determination (indicated by an Assessor tick to the right of each itemised step, or an Observer tick to the right of each itemised step, and confirmation by an Assessor in the Assessor Comments).
 - Where you have determined that one or more task steps have not been satisfactorily demonstrated, provide the Participant with additional support and outline details of such assistance in the Assessor/Observer Comments. Allow the Participant two (2) further opportunities to demonstrate the task again to allow an opportunity for a 'Satisfactory' assessment outcome to be achieved.
 - If after three (3) attempts the Assessor determines that the Participant cannot demonstrate the required steps, a 'Not Satisfactory' outcome is to be determined.

ASSESSOR COMMENTS: GENERAL

[illegible]

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