

Evaluation of the Tiered Industry Training Framework

March 2021

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1. Executive Summary

The Tiered Industry Training Framework (TITF) was introduced in September 2018 to reduce alcohol-related harm in NSW and improve responsible service of alcohol (RSA) procedures by ensuring that frontline staff, licensees and approved managers are trained at a level appropriate to their roles. Under the TITF, RSA training in NSW was aligned with the National RSA unit of competency, and a requirement to undertake a separate module on the NSW regulatory environment was introduced. In addition, new Licensee Training (LT) and Advanced Licensee Training (ALT) courses were introduced, along with a NSW RSA bridging course for interstate citizens, and a strengthened online RSA refresher course and assessment framework.

Consistent with advice provided to the former Minister for Racing in January 2018, and with the Government's commitment to evidence-based decision-making, an evaluation of the TITF was prioritised by Liquor & Gaming NSW (L&GNSW) for 2020-21. The evaluation was specifically focused on the uptake, efficiency and impact of training introduced under the TITF, including the content of the training, its effectiveness in improving RSA behaviour, and accessibility for liquor industry workers. Stakeholders were consulted via a call for written submissions, training course participant surveys, and stakeholder interviews. The evaluation was also informed by a range of internal information and data, including training materials and training records.

Most industry stakeholders reported that the TITF has contributed to improvements in the knowledge and skills of liquor industry workers, and many reported that it has contributed to improvements in the operation and management of licensed venues. While these results are encouraging, self-reported data from course participants has inherent limitations and the ability of L&GNSW compliance officers to visit licensed premises and observe any improvements in venue management and operation was restricted during the COVID-19 pandemic. The evaluation therefore recommends that L&GNSW consider undertaking further research to more comprehensively examine the extent to which the TITF is contributing to improvements in the knowledge and skills of liquor industry workers, and in the operation and management of licensed venues.

The evaluation found that while most licensees, approved managers and club secretaries that are required to have completed LT and ALT have done so, significant areas of non-compliance remain in the workforce. It recommends that L&GNSW work with the Behavioural Insights Unit to determine what, if any, behavioural insights techniques could be used to incentivise liquor industry workers to comply with the training requirements under the TITF. The evaluation also recommends that L&GNSW report on, and monitor compliance by, licensees that are directed by L&GNSW or the Independent Liquor & Gaming Authority (ILGA) to complete LT or ALT.

While some liquor industry workers viewed the training requirements as a 'box-ticking' exercise when the TITF was first introduced, there has since been a greater recognition among industry workers of the rationale and benefits of training. However, the cost and time involved in completing training were found to be barriers for some liquor industry workers,

particularly those in regional areas. The evaluation recommends that, while the cost and time associated with travel to face-to-face training can be ameliorated by completing training online, the organisation of more group training delivery in regional areas, possibly via liquor accords, would help to provide greater opportunities for regional workers to undertake face-to-face training. The evaluation also recommends that L&GNSW consider how it can minimise confusion among liquor industry workers as to whether or not advertised RSA courses are accredited.

Most stakeholders are satisfied with the existing training course structure, and training course participants are generally highly satisfied with the quality and relevance of industry training. More specifically, RSA training course participants were more satisfied with their training if it was delivered face-to-face than online, ALT course participants were more satisfied if their training was delivered online than face-to-face, and LT course participants reported little difference. The evaluation recommends that, while liquor industry workers should be provided with training that addresses broad competencies across all types of licensed premises, Approved Training Providers (ATPs) should ensure that appropriate consideration is given to the needs of regional businesses and specific types of venues (e.g. packaged liquor stores) when customising their courses.

The evaluation recommends that L&GNSW regularly consult with relevant business units to identify and respond to any gaps in the curricula, and provide ATPs with sufficient forewarning, where possible, that updated course content will be made available to them. It also recommends that L&GNSW (a) encourage ATPs to expand their use of case studies, videos, role play, and other practical learning methods during training delivery; (b) conduct regular reviews of training content to ensure it is written in a plain English format and recommend a minimum level of English language competency for LT and ALT; and (c) examine issues raised by stakeholders during the evaluation in relation to the definition of a 'Tier 2' venue.

To support informed purchasing behaviour by liquor industry workers and promote competitive tension among training providers, the evaluation recommends that the L&GNSW website should (a) provide a broad statement regarding the price range for the Licensee and Advanced Licensee training courses, and (b) encourage participants to directly contact ATPs to confirm course prices (including via provision of links to provider websites where appropriate). Given current limitations in relation to data collection and monitoring, the evaluation also recommends that a TITF data collection and monitoring strategy be developed to ensure appropriate and efficient on-going monitoring of key TITF performance measures, and that any future evaluation of the TITF include a focus on the success of any measures introduced to improve compliance with the training requirements.

2. Findings and Recommendations

Achievement of program objectives

Finding 1

Most industry stakeholders believe that the TITF has contributed to improvements in the knowledge and skills of liquor industry workers, and many believe it has contributed to improvements in the operation and management of licensed venues.

Finding 2

Most industry stakeholders agree that the TITF has improved the quality and usefulness of industry training when compared to the arrangements that were in place prior to its introduction.

Recommendation 1

L&GNSW should consider undertaking further research to examine the extent to which the TITF is contributing to improvements in the knowledge and skills of liquor industry workers, and in the operation and management of licensed venues.

Uptake of training courses by liquor industry workers

Finding 3

While most licensees, approved managers and club secretaries that are required to have completed Licensee Training and Advanced Licensee Training have done so, significant areas of non-compliance remain in the workforce.

Finding 4

While most liquor industry workers enrol in training due to the mandatory nature of the requirement, some workers view the training as a professional development opportunity.

Finding 5

While L&GNSW and ILGA have directed a number of licensees to complete Licensee and Advanced Licensee Training, there is currently no process in place to report on and monitor compliance by these licensees in response to this direction.

Recommendation 2

L&GNSW should work with the Behavioural Insights Unit to determine what, if any, behavioural insights techniques could be used to incentivise liquor industry workers to comply with the training requirements under the TITF.

Recommendation 3

L&GNSW should report on, and monitor compliance by, licensees that are directed by L&GNSW or ILGA to complete Licensee or Advanced Licensee Training.

Facilitators and barriers to training enrolment and completion

Finding 6

The cost and time involved in completing training is a barrier for some liquor industry workers, particularly those in regional areas.

Finding 7

While some liquor industry workers viewed the training requirements as a 'box-ticking' exercise when the TITF was first introduced, there has since been a greater recognition among industry workers of the rationale and benefits of training.

Finding 8

Most stakeholders thought that the TITF training courses were adequately promoted by L&GNSW.

Finding 9

There is evidence that some training providers offer non-accredited training courses that some liquor industry workers have completed in the mistaken belief that they would provide RSA accreditation.

Recommendation 4

While the cost and time associated with travel to face-to-face training can be ameliorated by completing training online, the organisation of more group training delivery in regional areas, possibly via liquor accords, would help to provide greater opportunities for regional workers to undertake face-to-face training.

Recommendation 5

L&GNSW should consider how it can minimise confusion among liquor industry workers as to whether or not advertised RSA courses are accredited.

Stakeholder satisfaction with the courses and framework

Finding 10

While most stakeholders were satisfied with the existing training course structure, some stakeholders suggested that certain courses should either be combined or divided into discrete topics to better meet the perceived needs of liquor industry workers.

Finding 11

Training course participants are generally highly satisfied with the quality and relevance of industry training.

Finding 12

RSA training course participants were more satisfied with their training if it was delivered face-to-face than online, Advanced Licensee Training course participants were more satisfied if their training was delivered online than face-to-face, and Licensee Training course participants reported little difference.

Finding 13

While Approved Training Providers reported customising their courses to suit the needs of participants, some stakeholders suggested that a greater consideration of the needs of regional businesses and specific types of venues (e.g. packaged liquor stores) would be beneficial in this process.

Recommendation 6

While liquor industry workers should be provided with training that addresses broad competencies across all types of licensed premises, Approved Training Providers should ensure that, in customising their courses, appropriate consideration is given to the needs of regional businesses and specific types of venues (e.g. packaged liquor stores).

Meeting the needs of training participants

Finding 14

While processes are in place to review and update course content, some stakeholders claimed that training manuals are not always updated in a sufficiently timely manner.

Finding 15

While most industry stakeholders were satisfied with the detailed and comprehensive nature of the training curriculum, some suggested that the training manuals should be presented in a 'Plainer-English' format.

Finding 16

Training providers reported that very few course participants were unable to pass the assessment after three attempts.

Finding 17

While most training providers provide some level of support to participants that speak English as a Second Language (ESL), some screen participants prior to course completion to ensure that they have sufficient English language skills to meet the course requirements.

Finding 18

Most stakeholders did not raise concerns about the RSA, Licensee Training and Advanced Licensee Training course duration.

Finding 19

While most stakeholders did not raise concerns about the current definition of a 'Tier 2' venue, which is used to determine which licensees must complete Advanced Licensee Training, a number of areas for further consideration were identified.

Finding 20

The training requirements do not fully meet the needs or respond to the specific operational risks of packaged liquor delivery services, though the development of a new Responsible Supply of Alcohol Training course for same-day alcohol delivery workers will help to address this issue.

Finding 21

Virtual and online training has been offering greater convenience, flexibility and affordability for a significant number of liquor industry workers, particularly during the COVID-19 pandemic.

Recommendation 7

The Liquor & Gaming Sector Training & Access team should regularly consult with relevant business units to identify and respond to any gaps in the curricula.

Recommendation 8

L&GNSW should provide Approved Training Providers with sufficient forewarning, where possible, that updated course content will be made available to them, so they have more certainty and time to prepare for the updating of the curricula.

Recommendation 9

L&GNSW should encourage Approved Training providers to expand their use of case studies, videos, role play, and other practical learning methods during training delivery.

Recommendation 10

L&GNSW should conduct regular reviews of training content to ensure it is written in a plain English format and recommend a minimum level of English language competency for Licensee and Advanced Licensee Training.

Recommendation 11

L&GNSW should examine issues raised by stakeholders during the evaluation in relation to the definition of a 'Tier 2' venue.

Value for money, other impacts and improvements to the framework

Finding 22

While stakeholders are generally satisfied with the training course prices, some claim more should be done to promote competition among training providers.

Finding 23

Shortcomings were identified with some internal data collection and monitoring processes that made it difficult to determine whether some industry workers were compliant with the training requirements.

Recommendation 12

The L&GNSW website should (a) provide a broad statement regarding the price range for the Licensee and Advanced Licensee training courses, and (b) encourage participants to directly contact Approved Training Providers to confirm course prices (including via provision of links to provider websites where appropriate).

Recommendation 13

Given current limitations in relation to data collection and monitoring, a TITF data collection and monitoring strategy should be developed to ensure appropriate and efficient on-going monitoring of key TITF performance measures.

Recommendation 14

L&GNSW should (a) within three years of implementation of the recommendations in this report, assess the need for any further evaluation of the TITF to ensure that it is able to respond to the evolving needs of industry, regulators and the community into the future; and (b) ensure that any such evaluation includes a focus on the success of any measures introduced to improve compliance with the training requirements.

3. Background

3.1 Purpose of the Tiered Industry Training Framework

The purpose of the Tiered Industry Training Framework (TITF) is to reduce alcohol-related harm in NSW and improve responsible service of alcohol (RSA) procedures by ensuring that frontline staff, licensees and approved managers are trained at a level appropriate to their roles. The framework was designed to:

- ▲ build on the education of liquor industry staff
- ▲ provide specialised training for licensees and managers
- ▲ improve the effectiveness of the RSA course, and
- ▲ harmonise the NSW RSA course with other Australian states and territories.

3.2 Review of the *Liquor Act 2007*

Since 2004, RSA training has been mandatory for licensees, serving staff and security staff in licensed venues. While this training provided participants with general knowledge of RSA principles and obligations under the liquor laws, it did not cater to the specific needs of security staff, RSA marshals, bar managers or venue managers and licensees.

The 2013 Statutory Review of the *Liquor Act 2007*¹ contained four recommendations about industry training (recommendations 16–19), which were supported by Government:

- ▲ A tiered approach to training should be developed that extends to mandated licensee training, and tailored RSA training for other industry workers, and allows for refresher training to be undertaken when competency cards expire
- ▲ Initially mandated licensee training should focus on higher risk venues (such as hotels, bars, clubs, late trading venues) or venues located in high risk precincts
- ▲ Competency training should be introduced for high risk venues and the Authority should be given the ability to refuse applications where the competency of the individual (training and experience) is disproportionate to the risk profile of the licensed venue
- ▲ Administration of industry training should rest with a single decision maker in the then Office of Liquor, Gaming & Racing (OLGR)² to avoid confusion and inconsistencies.

The purpose of these recommendations was to establish a tiered approach to RSA training and equip course participants with the specific skill sets and knowledge they require to perform their roles in a lawful and responsible manner. These reforms also sought to align the approval of RSA and licensee training, so a single decision-maker is responsible for approving all industry training.

¹ Foggo, M 2013, *Report on the statutory review of the Liquor Act 2007 and the Gaming and Liquor Administration Act 2007*, viewed 2 March 2021, https://www.parliament.nsw.gov.au/tp/files/21157/Review_LA_GALAA_NOV2013.pdf

² In 2016, L&GNSW replaced OLGR and took on the responsibility for designing and implementing the TITF.

3.3 Introduction of the framework

In 2015, OLGR established the Industry Training Working Group (ITWG) to obtain feedback on the establishment of a TITF. It included representatives from the Australian Hotels Association NSW (AHA), ClubsNSW, Club Managers' Association Australia (CMAA), Liquor Stores Association NSW (now Retail Drinks Australia (RDA)), and Restaurant & Catering Australia.

During this consultation process, it was agreed that the RSA course should be aligned to the nationally recognised Australian Skills Quality Authority (ASQA³) RSA course, with a separate module on the NSW regulatory environment. It was also agreed that additional training was required for the licensees of late-trading and high-risk venues.

Following its formation in 2016, L&GNSW consulted the ITWG, which the NSW Police Force joined in 2018, to confirm industry training needs and barriers to training availability. In early 2018, L&GNSW conducted an Expression of Interest (EOI) process to select eight Approved Training Providers (ATPs) to work with L&GNSW and the ITWG to co-design a new training framework and provide training to industry workers.

This process led to the development of new training courses which were reflected in the remade Liquor Regulation 2018. The TITF was introduced in September 2018, with the new courses released to market in December 2018. A second phase of the TITF was implemented in 2019. This second phase involved introducing a NSW RSA bridging course for interstate citizens (in August 2019) and strengthening the online RSA refresher course and its assessment framework (in November 2019).

3.4 Approved training courses

The following training courses are available under the TITF.

3.4.1 RSA training

RSA training is mandatory for a liquor industry worker to sell and serve alcohol in NSW. The course focuses on the responsibilities of frontline workers in licensed venues. These frontline workers include:

- ▲ licensees, managers and service staff
- ▲ club secretaries and club directors (if they serve alcohol)
- ▲ RSA marshals
- ▲ crowd controllers and security staff
- ▲ promotional staff
- ▲ volunteers.

RSA training is comprised of both the National RSA unit of competency (SITHFAB002 – Provide responsible service of alcohol) and a separate module on the specific legislative

³ ASQA is the national regulator for vocational education and training (VET). It registers training providers and accredits VET courses to ensure that nationally approved standards are met.

requirements to qualify for NSW RSA competency. The certification is recognised in NSW and allows liquor industry workers to work in licensed premises in other states or territories (except Victoria and the ACT).

The training covers subjects such as:

- ▲ How to provide responsible service of alcohol
- ▲ NSW liquor laws and selling serving or supplying alcohol responsibly
- ▲ About secondary sales/supply
- ▲ How to help customers to drink within appropriate limits
- ▲ How to assess alcohol-affected customers and refuse service
- ▲ How to perform an identification check
- ▲ Strategies for harm minimisation
- ▲ Compliance and enforcement.

3.4.2 Licensee Training and Advanced Licensee Training

Most licensees, approved managers and club secretaries (including licensees and approved managers at The Star Casino) need to complete the Licensee Training (LT) course. This training is designed to ensure that they have a better understanding of the NSW liquor laws and their higher-level compliance responsibilities beyond those covered in RSA training.

LT covers topics including:

- ▲ Overview of liquor regulation in NSW
- ▲ Responsibilities to manage alcohol related harms
- ▲ Best practice strategies to prevent alcohol related harms
- ▲ Compliance and enforcement.

New licensees, approved managers and club secretaries must complete an RSA course before completing LT. From 1 March 2020⁴, new licensees, approved managers and club secretaries were required to complete LT within 12 months of the date of their liquor licence approval. From 2 February 2021, new licensees, approved managers and secretaries are required to complete LT within 6 months of their liquor licence or application approval. Prior to 1 March 2020, new club secretaries and approved managers were required to complete LT within 60 days of commencing in their position and new licensees were required to complete LT prior to their application approval.

For current licensees, approved managers and club secretaries, RSA competency renews automatically upon LT completion. Interstate workers with RSA qualifications wanting to become a licensee, approved manager or club secretary can skip the RSA bridging course and do LT to gain RSA and LT competency.

Advanced Licensee Training (ALT) is an additional course for those who operate a business in a higher risk environment. These licensed premises include:

⁴ Licensees were given 12 months to complete LT from this date due to COVID-19 disruptions.

- ▲ small bars authorised to trade between 2-5am on a regular basis
- ▲ other premises authorised to trade between midnight and 5am on a regular basis
- ▲ certain business types, such as karaoke bars and adult entertainment premises
- ▲ those subject to a regulatory scheme
- ▲ those directed by L&GNSW or ILGA.

ALT covers topics including:

- ▲ Overview of liquor regulation in higher risk environments in NSW
- ▲ Build a culture of compliance in your business
- ▲ Government and industry approaches to minimise alcohol related harms
- ▲ Best practice strategies and minimising risk of alcohol related harms in your business.

3.4.3 RSA bridging course

Qualified interstate workers can complete an RSA bridging course to gain RSA competency. This course focuses on NSW liquor laws, industry best practice and guidance on how to sell, serve and supply alcohol safely and responsibly. Interstate workers with appropriate RSA competencies that want to become licensees, approved managers or club secretaries can skip the bridging course and complete LT to gain both their NSW RSA and LT competencies.

The course is available for people who have one of the following RSA competencies:

- ▲ RSA certificate or refresher certificate from Victoria issued within the last three years, or
- ▲ an RSA certificate or refresher certificate or national RSA statement of attainment from the Australian Capital Territory issued within the last three years, or
- ▲ a national RSA statement of attainment from the Northern Territory, South Australia, Western Australia, Queensland, or Tasmania issued within the last five years.

3.4.4 RSA refresher training

Liquor industry workers must renew their NSW RSA competency every five years. Due to disruptions arising from the COVID-19 pandemic, RSA competency cards that were due to expire on or after 1 March 2020 have been extended, with a new expiry date of 30 June 2021. To renew a competency card, liquor industry workers must complete an RSA refresher course and achieve a 100% mark on a multiple-choice assessment at the end of the course. The RSA refresher course covers topics including:

- ▲ NSW liquor laws
- ▲ Intoxication
- ▲ Minors
- ▲ Harm minimisation strategies
- ▲ Compliance and enforcement.

The duration and cost of each training course are provided in Table 1.

Table 1: Duration and cost of TITF training courses

Training course	Duration	Cost ⁵
RSA Training	3-6 hours	\$114-\$170
Licensee Training (LT)	6 hours	\$395-\$480
Advanced Licensee Training (ALT)	6 hours	\$395-\$480
RSA Bridging Course	90 minutes	\$86
RSA Refresher Training	45 minutes	\$41

3.5 Training providers and course delivery options

3.5.1 Training providers

As at 2 March 2021, L&GNSW has approved 87 training providers to deliver RSA training in NSW, and eight training providers to delivery LT and ALT. The eight approved ATPs are:

- ▲ Barrington Training Services
- ▲ Clear to Work
- ▲ Express Online Training
- ▲ Institute of Training and Further Education
- ▲ Restaurant & Catering Association
- ▲ TAFE NSW
- ▲ Urban Global
- ▲ William Angliss Institute of TAFE.

All ATPs approved by L&GNSW are ASQA-accredited. The RSA bridging course and RSA refresher training are delivered by L&GNSW.

3.5.2 Course delivery options

TITF courses are available to liquor industry workers via the following three delivery pathways:

- ▲ Face-to-face: Delivered in a face-to-face classroom setting
- ▲ Online module: Delivered as an online learning module
- ▲ Virtual classroom: Delivered in a virtual classroom setting.

⁵ Course fees are current as at 5 March 2021 and are subject to change.

The RSA bridging course and RSA refresher training are delivered via online modules only. ATPs may deliver RSA Training, LT and ALT via online modules, face-to-face and/or in virtual classroom format (see Table 2).

Table 2: Training course delivery organisations and formats

Training course	Delivery organisation	Delivery format
RSA Training	ATPs	Online/face-to face/virtual classroom
Licensee Training (LT)	ATPs	Online/face-to face/virtual classroom
Advanced Licensee Training (ALT)	ATPs	Online/face-to face/virtual classroom
RSA Bridging Course	L&GNSW	Online only
RSA Refresher Training	L&GNSW	Online only

4. Evaluation of the TITF

4.1 Rationale for the evaluation

The former Minister for Racing formally approved the TITF in January 2018. In approving the framework, the former Minister noted that a range of information would be collected for evaluation purposes, including industry feedback and feedback from training participants. Consistent with this advice, and with the Government's commitment to evidence-based decision-making, an evaluation of the TITF was prioritised by L&GNSW for 2020-21 and included in the Department of Customer Service's 2020-21 Evidence Bank report for NSW Treasury.

4.2 Evaluation objectives

The purpose of the evaluation was to assess the extent to which the TITF, and training courses delivered under the framework, are meeting their program objectives. The evaluation examined the uptake, efficiency and impact of TITF training. It focused on the quality and relevance of course content, the effectiveness of the training in improving responsible service of alcohol, and the accessibility of training by liquor industry workers.

To build a more robust understanding of the impact of the TITF, the evaluation focused on the following specific areas:

- ▲ the uptake of new courses offered under the framework
- ▲ any facilitators or barriers relating to the uptake of courses under the framework
- ▲ the level of stakeholder satisfaction with the courses and/or framework
- ▲ whether the courses and/or framework are meeting the needs of training participants
- ▲ whether the framework has improved the knowledge and skill base of frontline workers, licensees, approved managers and club secretaries, and contributed to improvements in the operation and management of licensed venues
- ▲ value for money and any other impacts of, and possible improvements to, the framework.

Evaluation questions underpinning each of these objectives are listed in Appendix A.

4.3 Scope

The evaluation was specifically focused on issues concerning the uptake, efficiency and impact of training introduced under the TITF, including content of the training, its effectiveness in improving RSA behaviour, and accessibility for liquor industry workers. The evaluation did not assess the administration of the framework by ATPs, which will be examined separately by L&GNSW.

4.4 Methodology

The evaluation utilised a mixed methods approach, whereby a range of quantitative and qualitative evidence was collected and analysed. The central premise of the mixed methods

approach is that it provides a better understanding of research problems than either a quantitative or qualitative approach alone (Creswell & Plano Clark 2017⁶).

4.4.1 Call for written submissions

Stakeholders were invited to lodge written submissions to inform the evaluation. L&GNSW invited written submissions via emails sent to key stakeholders and liquor accords, and via the L&GNSW website. The closing date for written submissions was 27 November 2020. A written submission was received from Retail Drinks Australia. The submission is published on the L&GNSW website.⁷

4.4.2 Surveys of training participants

L&GNSW invited training course participants to complete an online survey to provide feedback on the quality, usefulness and accessibility of TITF training. L&GNSW emailed the survey link to all LT and ALT participants that completed the course prior to 16 March 2020. LT and ALT participants that completed courses after this date were invited to complete a survey by their training provider on completion of their course. Similarly, L&GNSW emailed the survey link to all refresher training and RSA bridging course participants that completed the course prior to 31 March 2020. Refresher training and RSA bridging course participants that completed courses following this date were invited to complete a survey by L&GNSW on completion of their course. The survey questions can be found in Appendices B-F.

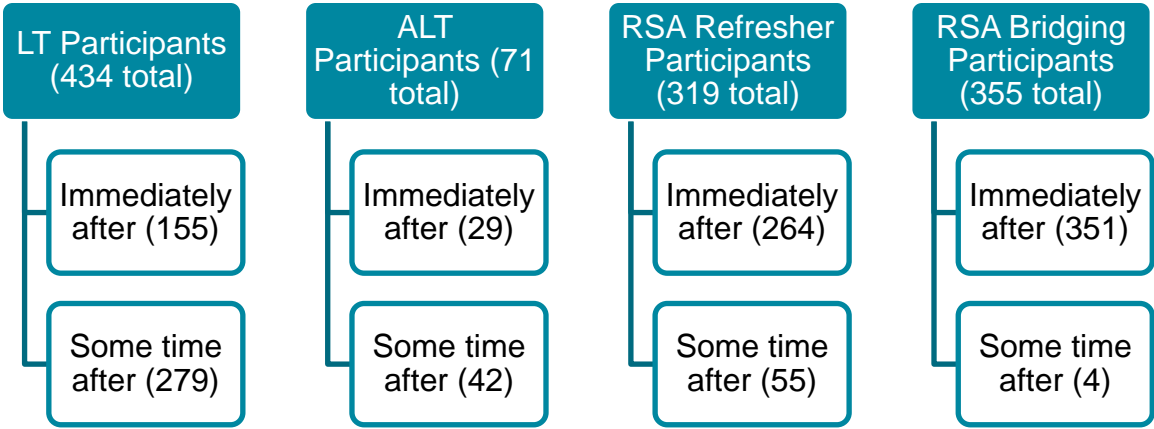
Figure 1 illustrates the number of training course participants who completed a survey, by course type and time of survey completion. A distinction is drawn between those who completed the survey immediately after the course and those completed the survey some time after the course. For those who completed the survey some time after the course, the timeframe for survey completion ranged from one week to 15 months after the course.

L&GNSW also invited a random sample of 5,000 liquor industry workers who completed the RSA training course between 1 July 2018 and 4 November 2020 to provide feedback via an online survey. This survey was also promoted to liquor industry workers by registered training providers and a number of liquor accords. In total, 99 workers completed the RSA training course survey.

⁶ Creswell, JW & Plano Clark, VL 2017, *Designing and conducting mixed methods research*, 7th edn, Sage Publications, Thousand Oaks, CA.

⁷ <https://www.liquorandgaming.nsw.gov.au/community-and-stakeholders/have-your-say/community-consultations/past-consultations>

Figure 1: Number of training course participants who completed a survey, by course type and time of survey completion.



4.4.3 Stakeholder interviews

To collect more detailed qualitative information on the outcomes and effectiveness of the TITF and the training courses delivered under the framework, L&GNSW held interviews with 11 stakeholder organisations, including industry peak body associations, ATPs, and Government agencies.

- ▲ Australian Hotels Association NSW (AHA)
- ▲ Clear to Work
- ▲ Club Managers’ Association Australia (CMAA)
- ▲ Express Online Training
- ▲ Independent Liquor & Gaming Authority (ILGA)
- ▲ Liquor & Gaming NSW (L&GNSW)
- ▲ Office of the NSW Small Business Commissioner (OSBC)
- ▲ Retail Drinks Australia (RDA)
- ▲ The Star Casino
- ▲ Urban Global
- ▲ William Angliss Institute of TAFE.

Eight other stakeholder organisations declined to be interviewed. Some of these stakeholders provided written feedback instead, including the NSW Police Force, ClubsNSW, the NSW Independent Bars Association, and Barrington Training Services.

4.4.4 Other information and data

In addition to information and data provided via the written submission process, online surveys and stakeholder interviews, the evaluation was informed by a range of internal information and data, including training materials and training records.

Training records were extracted from OneGov, an e-Government platform used by several NSW Government Departments to manage business, occupational, recreational and community licensing. Data on directions issued to licensees, approved managers and club secretaries by L&GNSW and ILGA were provided by Liquor & Gaming Compliance. Data on the number of training participants who were unable to complete the assessments were provided by individual ATPs.

Specific training course materials were reviewed to inform the evaluation.

4.4.5 Limitations

The limitations inherent in self-reported survey data were mitigated by a mixed-methods approach, where stakeholder interviews were used to elicit further detail and qualitative data for validation of findings.

The surveys did not ascertain the time period from completion of the course to survey completion. This data may be useful for future evaluations to examine the sustainability of course impacts over time.

5. Outcomes

5.1 Achievement of program objectives

As stated in section 3.1, the purpose of the TITF is to reduce alcohol-related harm in NSW and improve responsible service of alcohol procedures by ensuring that frontline staff, licensees and approved managers are trained at a level appropriate to their roles. Most course participants that completed a survey reported that the training had contributed to improvements in their knowledge, skills and understanding of their responsibilities as liquor industry workers.

Of those that completed the LT course, 96% reported improved knowledge, 94% reported improved skills and 95% reported better understanding of their responsibilities after completing the course. Of those that completed the ALT course, 94% reported improved knowledge, 90% reported improved skills and 94% reported better understanding of their responsibilities after completing the course. High percentages were also reported among RSA refresher and RSA bridging course participants (see Table 3).

Table 3: Percentage of survey respondents that reported improved knowledge, improved skills and a better understanding of their responsibilities after completing training

Training course	Improved knowledge	Improved skills	Better understanding of responsibilities
Licensee Training (LT)	96%	94%	95%
Advanced Licensee Training (ALT)	94%	90%	94%
RSA Refresher Training	N/A	85%	93%
RSA Bridging Course	98%	92%	99%

In addition to improvements in knowledge, skills and understanding, many LT and ALT survey respondents expected the training to contribute to improvements in, or reported that the training had contributed to improvements in, the operation and management of their venue (see Table 4). Of LT participants who completed the survey immediately after the course, 90% said they expected to see improvements to the operation and management of their venue as a result of completing the training. By comparison, 75% of LT participants who completed the survey some time after completing their course reported that the training had led to improvements in the operation and management of their venue⁸.

⁸ The time period from course completion to survey completion for those that completed the survey some time after the course was not measured, but would have ranged anywhere from one week to 15 months for individual participants.

Table 4: Percentage of LT and ALT survey respondents that expected completing their course would contribute to, or actually had contributed to, improvements in the operation and management of their venue

Training course	Surveyed some time after course (i.e. had observed improvement)	Surveyed immediately after course (i.e. expected to see improvement)
Licensee Training (LT)	75%	90%
Advanced Licensee Training (ALT)	76%	97%

The findings for ALT participants were similar. Of ALT participants who completed the survey immediately after the course, 97% said they expected to see improvements to the operation and management of their venue as a result of completing the training. By comparison, 76% of ALT participants who completed the survey some time after completing their course reported that the training had led to improvements in venue operation and management. While for both LT and ALT a higher percentage of participants reported expecting an improvement in venue operation and management than actually observed such an improvement, the percentages were highly encouraging for both groups of participants.

Feedback from industry peak bodies supported these survey findings, indicating that the TITF has met its key policy objective of improving responsible service of alcohol practices in venues by ensuring that frontline staff, licensees and approved managers are trained at a level appropriate to their roles. The AHA stated that training provided under the TITF provides new entrants with a good understanding of the licensed premises operating environment, risk mitigation strategies and regulatory changes, and noted that the ALT course is very practical and well targeted to those working in late trading venues. Similarly, ClubsNSW stated:

“The TITF has been effective at meeting its stated objectives – equipping industry workers with specific skill sets and knowledge necessary to perform roles in a lawful, responsible and compliant manner”.

Other industry stakeholders such as the CMAA stated that TITF training ensures that workers are aware of and can appropriately manage the risks involved in making significant decisions with grave safety consequences.

Most industry stakeholders agree that the TITF has improved the quality and usefulness of industry training when compared to the arrangements that were in place prior to its introduction. While the RSA course previously had to meet the needs of all types of liquor industry workers, it now focuses on the frontline worker and what they need to know, and the LT and ALT courses provide more detailed and specific information for those who are running a venue (and for ALT, running a venue in a higher risk environment). The AHA also noted that

the RSA bridging course is a useful addition, and a positive step toward mutual licence recognition⁹.

RDA stated that the TITF is more rigorous and holds industry participants to a higher standard than previous training arrangements. The CMAA argued that a tiered approach to training is the most appropriate method of ensuring that workers in the liquor industry have the skills required to perform their duties safely.

While the survey results were encouraging with regard to the extent to which knowledge and skills derived from the training was being translated into improved venue practice, the extent to which these responses may reflect practice in the sector more broadly, and the nature of reported improvements in the operation and management of venues, is unknown. As RDA noted in its submission:

“Whilst there may be several aspects of the TITF which can be considered superior to the previous training framework, the ultimate arbiter of its effectiveness is the application of knowledge in a licensed environment. Whilst Retail Drinks has received anecdotal feedback from members attesting to the effectiveness of the TITF, it is unclear as to whether this has translated to improved compliance outcomes at an actual store level”.

This issue has been further exacerbated during the COVID-19 pandemic, with L&GNSW compliance officers having limited ability to visit licensed premises and observe any improvements in venue management and operation that may be attributable to undertaking training under the TITF.

Given these limitations, it is recommended that L&GNSW consider undertaking further research to more comprehensively examine the extent to which the TITF is contributing to improvements in the knowledge and skills of liquor industry workers, and in the operation and management of licensed venues. Such research would provide invaluable information as to how venues are using the knowledge and skills derived from the TITF training to make improvements to the operation and management of their venue and would potentially identify areas for further improvement.

Finding 1: Most industry stakeholders believe that the TITF has contributed to improvements in the knowledge and skills of liquor industry workers, and many believe it has contributed to improvements in the operation and management of licensed venues.

Finding 2: Most industry stakeholders agree that the TITF has improved the quality and usefulness of industry training when compared to the arrangements that were in place prior to its introduction.

⁹ Draft legislation to amend the *Mutual Recognition Act 1992* to implement a uniform national scheme of automatic mutual recognition (AMR) to improve occupational mobility was publicly released in December 2020 for consultation.

Recommendation 1: L&GNSW should consider undertaking further research to examine the extent to which the TITF is contributing to improvements in the knowledge and skills of liquor industry workers, and in the operation and management of licensed venues.

5.2 Uptake of training courses by liquor industry workers

Compliance with the LT and ALT training requirements¹⁰

Table 5 shows the number of people that had completed the RSA, RSA refresher and RSA bridging courses under the TITF as at 3 February 2021. The total number of current RSA competency card holders as at 3 February 2021 was 670,051, with 64% of current competency card holders gaining their RSA accreditation before the introduction of the new RSA training requirements on 1 July 2018.

Table 5: Number of people that had completed the RSA, RSA refresher and RSA bridging courses under the TITF as at 3 February 2021

Training course	Number of course completions	% of total competency card holders
RSA (since 1 July 2018)	241,746	36%
RSA Refresher (since 1 November 2019)	13,762	2%
RSA Bridging (since 1 August 2019)	885	0.1%
Total RSA competency card holders	670,051	100%

Table 6 shows the number of licensees, approved managers and club secretaries that had completed the LT and ALT courses as at 3 February 2021. Licensees, approved managers and club secretaries appointed prior to 1 September 2018 are required to complete the training when their competency card expires. Licensees, approved managers and club secretaries appointed after 1 September 2018 are normally¹¹ required to complete the training before the licence is approved or, for approved managers and club secretaries, within 60 days of their appointment. Licensees, approved managers and club secretaries

¹⁰ Note that for all data relating to compliance with the training requirements, duplicate records may exist for some people recorded in the OneGov database. Some people hold multiple positions and may be counted more than once.

¹¹ In March 2020, new licensees and approved managers were granted a period of 12 months from the time of licence approval to complete the training.

appointed after 1 March 2020 have been granted an extension to 30 June 2021 to complete their training requirements due to the disruptions relating to the COVID-19 pandemic.

Table 6: Number of licensees, approved managers and club secretaries that had completed the LT and ALT courses as at 3 February 2021

Training course	Number of course completions
Licensee Training (LT)	7,345
Advanced Licensee Training (ALT)	962

Table 7 shows the percentage of current licensees, approved managers or club secretaries who were required to have completed LT and/or ALT as at 3 February 2021 who were recorded in OneGov as having completed their training requirements. While Liquor & Gaming Compliance reported that they had undertaken a significant follow-up exercise in May 2020 to contact licensees who had not completed their training requirements, it seems that there remains a significant number of licensees recorded in OneGov who are non-compliant.

Table 7: Percentage of current licensees, approved managers and club secretaries who were required to have completed LT and/or ALT as at 3 February 2021 who were recorded in OneGov as having completed their training requirements¹²

Appointment date	LT	ALT
Prior to 1 Sep 2018	63%	79%
On or after 1 Sep 2018	88%	76%

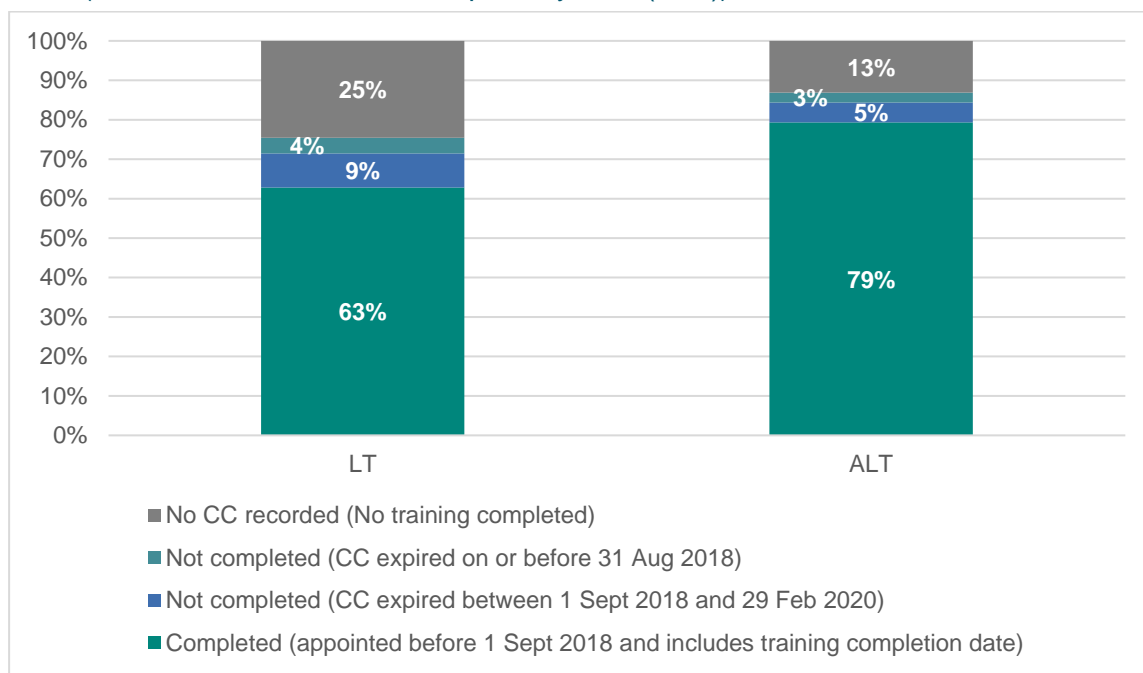
During initial implementation of the TITF, a supportive and educative approach to compliance with the TITF requirements was adopted by Liquor & Gaming Compliance. However, it was difficult for them to implement this approach in 2020 due to restrictions imposed in response to the COVID-19 pandemic. While some stakeholders, such as the OSBC, have been supportive of the general approach taken by L&GNSW to compliance with the requirements, others have suggested that a more significant enforcement strategy is required to ensure high rates of compliance.

In analysing the data presented in Table 7, it was discovered that a significant number of current licensees, approved managers and club secretaries appointed prior to 1 September 2018 were recorded as not having competency cards. A breakdown is provided in Figure 2. This shows that 25% of those who should have completed LT, and 13% of those who should

¹² These figures may include people who completed the training before they were required to (i.e. well before their competency card expiry date).

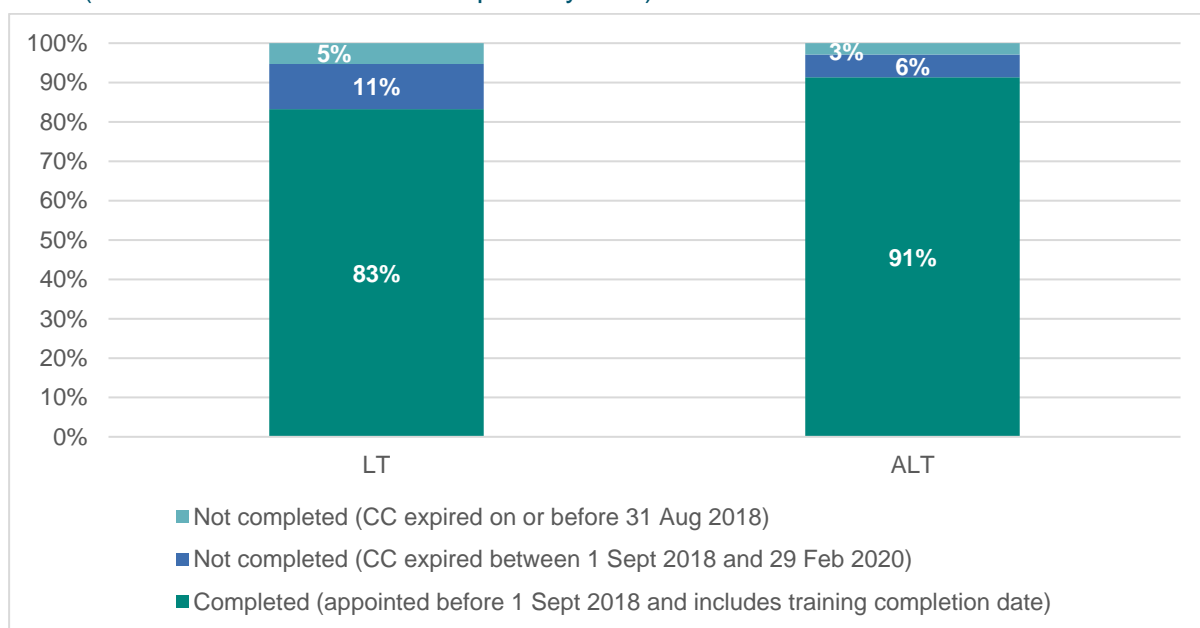
have completed ALT, are recorded as not having completed the training *and* not having a competency card.

Figure 2: Percentages of licensees, approved managers and club secretaries appointed prior to 1 September 2018 that have completed or not completed LT and/or ALT as at 3 February 2021 (includes those without a competency card ('CC'))



While those without a competency card were included in the calculations in Table 7, it is unclear how many of these licensee records are affected by data entry errors, refer to licensees of venues that are not currently trading but have not surrendered their licence, or refer to licensees that have left the industry without alerting L&GNSW to this change. When those without a competency card are removed from the analysis, the rate of compliance is significantly higher for both LT (83%) and ALT (91%) (see Figure 3).

Figure 3: Percentages of licensees, approved managers and club secretaries appointed prior to 1 September 2018 that have completed or not completed LT and/or ALT as at 3 February 2021 (excludes those without a competency card)

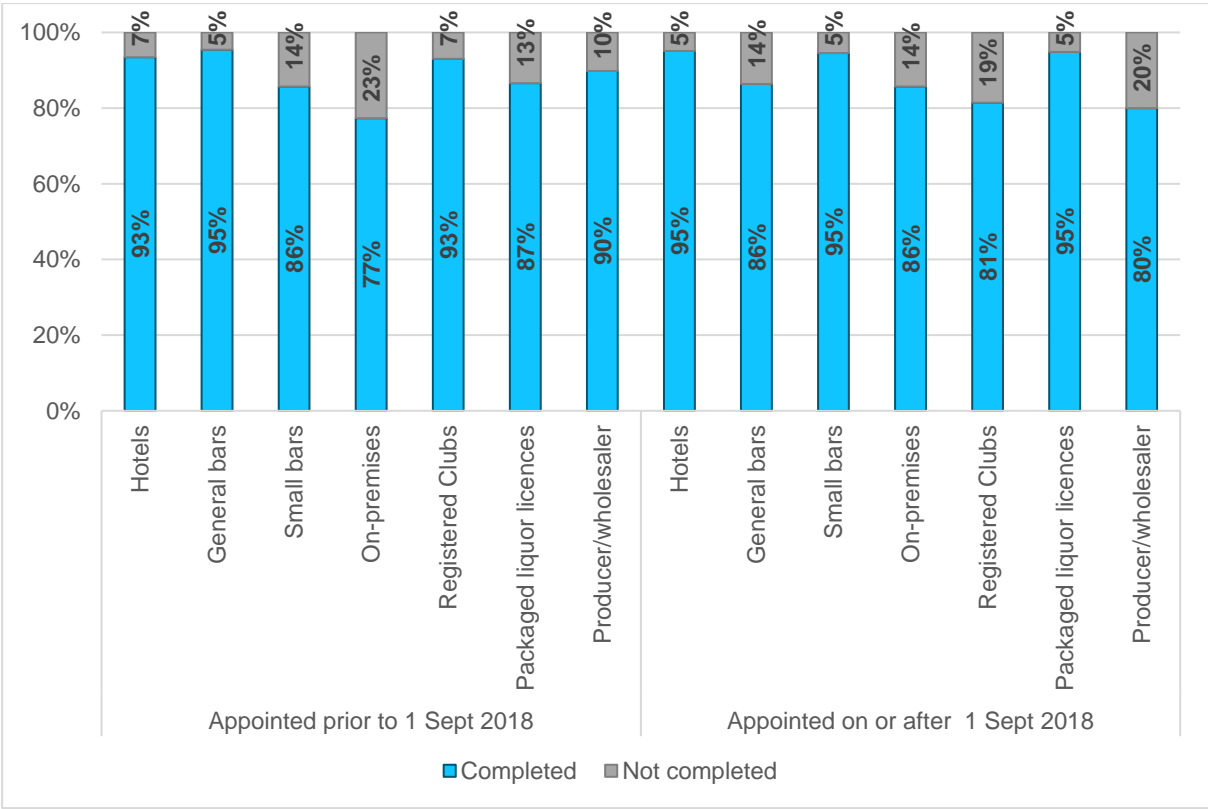


Figures 4 and 5 show the breakdown of compliance rates by licence type for LT and ALT respectively, when those without a competency card have been removed from the analysis. For those appointed before 1 September 2018, the lowest rate of compliance with LT requirements was seen for on-premises licences (77%). For those appointed on or after 1 September 2018, the lowest rate of compliance with LT requirements was seen for producer/wholesaler licences (80%).

For those appointed before 1 September 2018, the lowest rate of compliance with ALT requirements was seen for on-premises licences (58%). For those appointed on or after 1 September 2018, the lowest rate of compliance with ALT requirements was seen for general bar licences (50%).

No small bar, packaged liquor or producer/wholesaler licensees appointed prior to 1 September 2018 were required to complete ALT and no packaged liquor licensees appointed after 1 September 2018 were required to complete ALT.

Figure 4: Percentages of current licensees, approved managers and club secretaries (i.e. those who were required to have completed LT) who had or had not completed LT as at 3 February 2021, by licence type and appointment date



Figures 6 and 7 show the metropolitan status breakdown of compliance rates for LT and ALT respectively, when those without a competency card have been removed from the analysis. For LT, little difference was observed between metropolitan and non-metropolitan workers. For ALT, the compliance rate for those appointed on or after 1 September 2018 was much lower for non-metropolitan workers (66%) than for metropolitan workers (81%).

Figure 5: Percentages of current licensees, approved managers and club secretaries (i.e. those who were required to have completed ALT) who had or had not completed ALT as at 3 February 2021, by licence type and appointment date

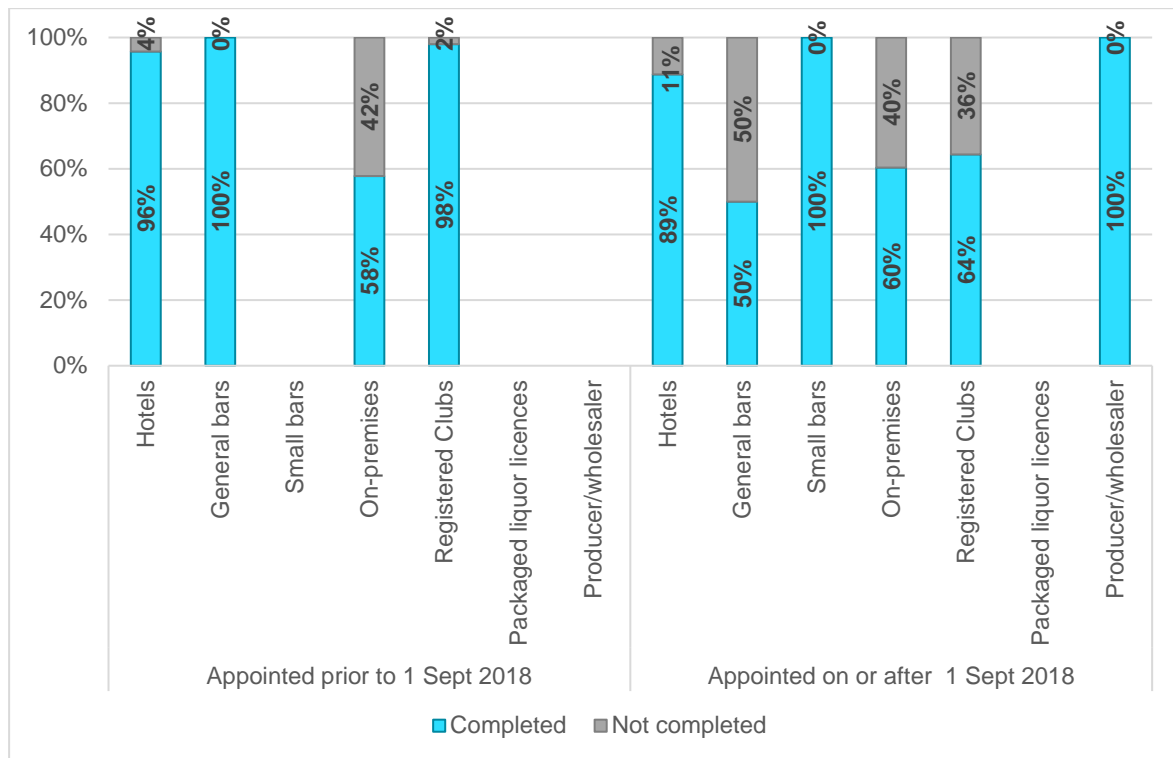


Figure 6: Percentages of current licensees, approved managers and club secretaries (i.e. those who were required to have completed LT) who had or had not completed LT as at 3 February 2021, by metropolitan status and appointment date

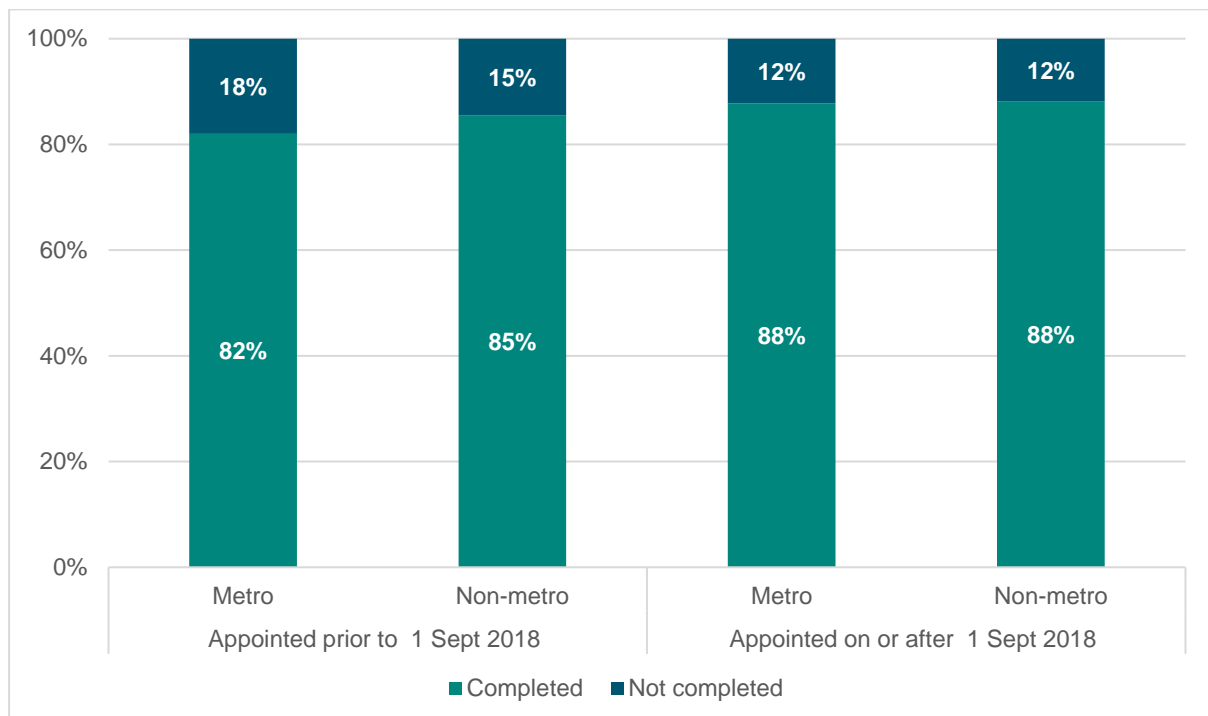
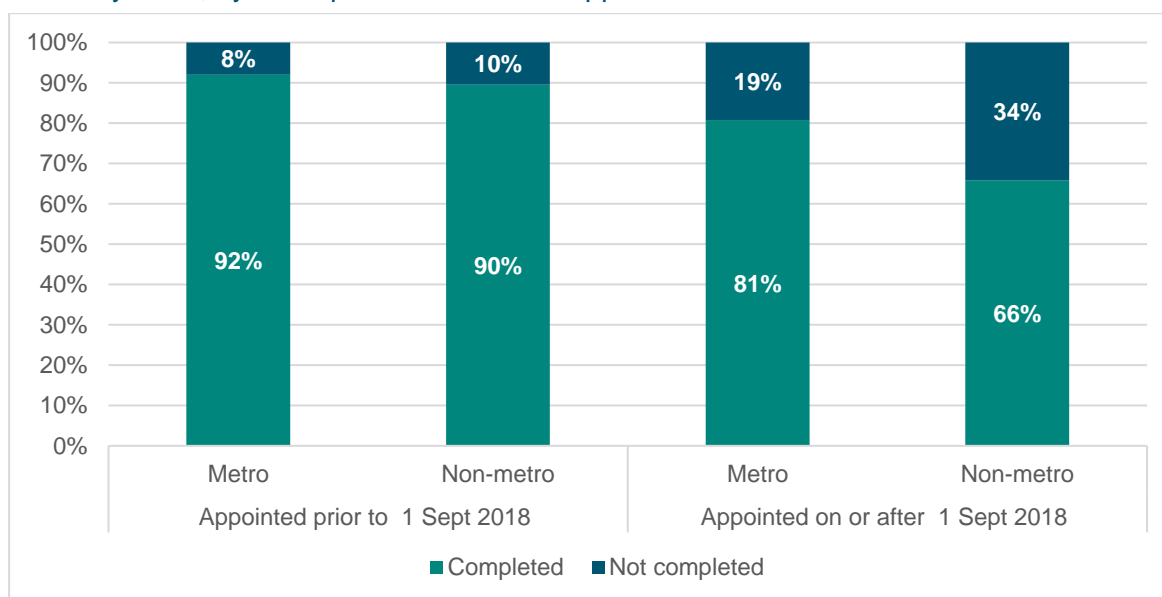


Figure 7: Percentages of current licensees, approved managers and club secretaries (i.e. those who were required to have completed ALT) who had or had not completed ALT as at 3 February 2021, by metropolitan status and appointment date



Given that there are still significant areas of non-compliance with the training requirements among liquor industry workers, it is recommended that L&GNSW work with the Behavioural Insights Unit (BIU) to determine what, if any, behavioural insights techniques could be used to incentivise liquor industry workers to comply with the training requirements under the TITF.

As an example, L&GNSW sends reminders to competency card holders 90, 60 and 30 days before their competency card expires. The BIU could work with L&GNSW to modify the wording in these reminder letters to increase the likelihood that recipients will take action in response to the reminders. Stakeholders such as the CMAA also suggested that L&GNSW should consider other communication methods, such as videos, to raise awareness and encourage training completion and this is something on which the BIU could also provide advice.

Finding 3: While most licensees, approved managers and club secretaries that are required to have completed Licensee Training and Advanced Licensee Training have done so, significant areas of non-compliance remain in the workforce.

Recommendation 2: L&GNSW should work with the Behavioural Insights Unit to determine what, if any, behavioural insights techniques could be used to incentivise liquor industry workers to comply with the training requirements under the TITF.

Reasons for LT and ALT completion

Stakeholder feedback indicated that while most liquor industry workers enrol in training due to the mandatory nature of the requirement, some workers view the training as a professional development opportunity. A small number of LT survey respondents (9%) and ALT survey respondents (16%) completed the training to contribute to their professional development, even when not a mandatory requirement (see Table 8). On the other hand, 42% of LT and 34% of ALT survey respondents stated that they only completed the training because it was a

mandatory requirement. In total, 48% of LT and 50% of ALT survey respondents stated that they completed the training both due to it being a requirement and because it contributed to their professional development. Some ATPs confirmed that some participants complete LT and ALT solely for professional development purposes, though noted that if the training was not mandated few would be likely to enrol.

Table 8: Percentage of LT and ALT survey respondents that completed the training because it was mandatory or because it contributed to their professional development

Training course	Completed only because it was mandatory	Completed because it was mandatory and for professional development	Completed only for professional development
Licensee Training (LT)¹³	42%	48%	9%
Advanced Licensee Training (ALT)	34%	50%	16%

Finding 4: While most liquor industry workers enrol in training due to the mandatory nature of the requirement, some workers view the training as a professional development opportunity.

Licensees given a direction by L&GNSW or ILGA to undertake training

Either L&GNSW or ILGA may direct a licensee to complete LT or ALT. However, the powers that L&GNSW and ILGA have to issue such directions are different in nature and conferred under different parts of the legislation. Under clause 69 of the Liquor Regulation 2018, the Secretary may direct any licensee or approved manager to complete LT or ALT if deemed necessary to ‘reduce the risk of alcohol-related violence or anti-social behaviour on or about the licensed premises.’ Under section 144F(1) of the *Liquor Act 2007*, ILGA may direct a licensee or approved manager of a venue that has incurred a strike to complete training to ‘reduce the risks that contributed to the commission of the prescribed offence in respect of which the strike was incurred’.

L&GNSW’s power to issue a direction to undertake training is more expansive than ILGA’s. The Secretary may issue such a direction for any reason considered appropriate, whereas ILGA’s power is limited to licensees or approved managers of venues that incur a strike. On the other hand, ILGA may direct a person to complete any training deemed necessary, whereas L&GNSW may only direct a person to complete LT and/or ALT.

¹³ A small percentage (0.5%) stated they completed the training for ‘other’ reasons (e.g. it was an employer requirement).

Liquor & Gaming Licensing reported only a single case where it had directed a licensee to complete either LT or ALT. This involved a licensee who was directed to complete ALT based on a recommendation from a Police Area Command (PAC). PACs may recommend to L&GNSW that it issue a direction for a licensee or approved manager to complete LT or ALT. NSW Police advised that the need for such a direction is generally identified locally by a PAC. It is then reviewed centrally by NSW Police and they provide advice back to the PAC. The PAC will then recommend that L&GNSW issue a direction for an individual to undertake training (if legal advice within NSW Police supports this recommendation). Police indicated that they may in future consider having the issuing of such recommendations centrally managed by NSW Police.

ILGA confirmed that it had, on the advice of L&GNSW, directed a number of licensees to complete LT or ALT as a result of incurring a strike. Liquor & Gaming Compliance searched its records and found that 26 licensees had been directed to complete training between December 2018 and November 2020. Of these, 18 were directed to complete both LT and ALT, seven were directed to complete only LT, and one was directed to complete only ALT.

The evaluation found that while L&GNSW and ILGA have directed a number of licensees to complete LT and ALT, there is currently no process in place to report on and monitor compliance by these licensees in response to this direction. Consequently, it is recommended that L&GNSW should report on, and monitor compliance by, licensees that are directed by L&GNSW or ILGA to complete LT or ALT. Given that these licensees have typically been directed to undertake training due to a history of compliance or venue management problems, it is important that their training completion be appropriately monitored to minimise the potential for community harm.

Finding 5: While L&GNSW and ILGA have directed a number of licensees to complete Licensee or Advanced Licensee Training, there is currently no process in place to report on and monitor compliance by these licensees in response to this direction.

Recommendation 3: L&GNSW should report on, and monitor compliance by, licensees that are directed by L&GNSW or ILGA to complete Licensee or Advanced Licensee Training.

5.3 Facilitators and barriers to training enrolment and completion

The cost of training

Participants of TITF training courses reported two main costs associated with completing their training requirements, financial cost and time cost, though the two were often linked. The extent to which these costs were barriers to individual participants was dependent on the location of the individual, their preference for online or face-to-face training, and the type of business they operated.

The primary time cost reported for workers was the amount of time that needed to be invested to complete training, particularly LT and ALT. For those completing face-to-face training, the training would typically be held during business hours, meaning the worker would be required to be absent from their workplace for the duration of the training, plus any

time spent travelling to and from the venue. This time cost was exacerbated for regional participants due to the few face-to-face options available, thus requiring these participants to travel some distance, and sometimes purchase accommodation to access training. Additionally, for those that operate small businesses, the time costs often translated directly to additional financial costs as they were required to find additional staff to cover their absence due to training requirements.

The time costs of training were somewhat mitigated for those that preferred to undertake online training instead of face-to-face as they were able to complete their training at their own convenience. This included the ability to pause and break up the training into shorter intervals. For those that chose to participate in a virtual classroom, the time costs were partially mitigated, in that these individuals were not required to travel to a venue to undertake training. However, they were still required to attend the training at a fixed time.

Some stakeholders suggested that a possible solution for regional workers intending or required to complete face-to-face training, particularly LT and ALT, could be to arrange for group training to be delivered in those regional areas. This could be facilitated by liquor accords, with interested ATPs provided the opportunity to deliver the training on a rotational basis or via an EOI process. This would also be an opportunity to foster greater networking and tailor the training to the needs of businesses in that particular region.

According to the RSA training survey, 40% of respondents stated that financial cost was a barrier to completing the training. This can be partially attributed to the competency card requirement, which is a major factor in training costs in NSW and a major cost difference when compared to other jurisdictions. For example, online RSA training in Queensland through Clear to Work, which fulfils the SITHFAB002 certification, costs \$17.50 to complete¹⁴.

Online RSA training in NSW through the same training provider costs approximately \$114¹⁵, including the \$85 competency card. There is no clear comparison between other jurisdictions for LT and ALT. However, some stakeholders, particularly smaller businesses, noted that the financial cost of LT and ALT was significant for them.

Finding 6: The cost and time involved in completing training is a barrier for some liquor industry workers, particularly those in regional areas.

Recommendation 4: While the cost and time associated with travel to face-to-face training can be ameliorated by completing training online, the organisation of more group training delivery in regional areas, possibly via liquor accords, would help to provide greater opportunities for regional workers to undertake face-to-face training.

Recognition of the rationale for training

When the TITF was introduced, there was initially some resistance to the LT, ALT and RSA refresher training requirements by certain parts of the industry. This was more pronounced

¹⁴ <https://cleartowork.com.au/rsa-qld-online/>

¹⁵ <https://cleartowork.com.au/nsw-rsa-online/>

among experienced operators who considered the training to be a 'box-ticking' exercise and increased red tape.

As greater numbers of industry participants completed LT and ALT, however, there has been increased recognition of the rationale behind those courses. Feedback from peak bodies indicated that they had encouraged their members to undertake the training and had emphasised the importance of the training. One peak body also noted the benefits of experienced operators undertaking training and sharing knowledge in a face-to-face or virtual classroom environment with less experienced operators.

This feedback from peak bodies is supported by findings from the course participant surveys. Table 9 shows the percentage of survey respondents who reported that they understood the rationale of the training requirement and the percentage who reported that they supported the training requirement. More than 90% of survey participants across each course understood the rationale for and supported the training requirement.

Table 9: Percentage of LT, ALT, RSA refresher and RSA bridging course survey respondents that reported understanding the rationale for the training requirement and supporting the training requirement

Training course	Understood the rationale for the training requirement	Supported the training requirement
Licensee Training (LT)	100% ¹⁶	98%
Advanced Licensee Training (ALT)	99%	97%
RSA Refresher Training	99%	93%
RSA Bridging Course	99%	N/A ¹⁷

Finding 7: While some liquor industry workers viewed the training requirements as a 'box-ticking' exercise when the TITF was first introduced, there has since been a greater recognition among industry workers of the rationale and benefits of training.

Promotion of the TITF training courses by L&GNSW

Most survey respondents (97% of LT respondents, 97% of ALT respondents, 94% of RSA Refresher training respondents) indicated that L&GNSW had adequately communicated the training requirements. Qualitative feedback from stakeholders also indicated that promotion of the TITF training requirements by L&GNSW was adequate. This would suggest that the

¹⁶ Rounded to the nearest whole number (Note: 0.4% did not understand the rationale).

¹⁷ RSA bridging course survey respondents were not asked this question.

non-compliance of some liquor industry workers outlined in section 5.2 is unlikely to be due to a lack of awareness of the training requirements.

Finding 8: Most stakeholders thought that the TITF training courses were adequately promoted by L&GNSW.

Non-accredited training providers

Some ATPs and peak bodies referred to instances of non-accredited training providers offering RSA training, often via online advertising. These stakeholders expressed concern that some liquor industry workers were being misled by such non-accredited training providers into completing courses that would not provide them with RSA certification.

Liquor & Gaming Compliance had been made aware of, and investigated, some non-accredited training providers offering RSA training, though they had not received any direct complaints from the public. In the examples found, the non-accredited courses were advertised as introductory and did not include RSA competency. The Liquor & Gaming Sector Training & Access team has also been in contact with some non-accredited providers to ensure they provide sufficient information to clarify that their course does not meet training requirements to work in the NSW liquor industry.

The ATPs and peak bodies that raised the issue of non-accredited training providers suggested that L&GNSW take enforcement action against the non-accredited providers to set a precedent. While L&GNSW does not have sufficient enforcement powers to take action against these non-accredited training providers, it is currently exploring options to take action via NSW Fair Trading. Additionally, the Sector Training & Access team have noted that a new ATP search and mapping tool will be released early in 2021 which should provide prospective liquor industry workers with additional information regarding which training providers can provide accredited training.

Finding 9: There is evidence that some training providers offer non-accredited training courses that some liquor industry workers have completed in the mistaken belief that they would provide RSA accreditation.

Recommendation 5: L&GNSW should consider how it can minimise confusion among liquor industry workers as to whether or not advertised RSA courses are accredited.

5.4 Stakeholder satisfaction with the courses and framework

Course structure

Most stakeholders are satisfied with the existing training course structure. The AHA, RDA and the CMAA, for example, support the current course structure as it fosters significant mobility of workers across the liquor industry. They believe that the generic content of LT makes it easier for workers to move between different licensed premises types. They suggested that if workers were required to complete additional training for different venue types, industry training would be costlier for workers and would create recruitment challenges for licensed venues.

While most stakeholders are satisfied with the existing course structure, some advocated for changes to make the training more relevant, streamlined and affordable for liquor industry workers. Some of these stakeholders recommended that a wider range of training courses be offered, with a focus on the operational needs of workers from particular types of licensed venue.

Similarly, two ATPs suggested that the general nature of LT content can make it difficult to engage participants as the curriculum does not always closely reflect their venue-specific training needs and experiences. They suggested that participants may find LT more useful if it was delivered in a tailored format for workers from venues operating under the same or similar liquor licence type. Consistent with this suggestion, a number of stakeholders commented that the content was not always relevant to packaged liquor stores or online packaged liquor services.

In contrast, one stakeholder suggested that it may be worth exploring the potential benefits of combining the LT and ALT courses for licensees of higher-risk Tier-2 venues into one course. In its opinion, a consolidated course for these workers would simplify the training requirement and reduce the time and cost involved in attending training. However, industry stakeholders, and a number of the ATPs, noted that it would be impractical to combine the LT and ALT courses due to the significant differences in the scope and content of their curricula.

Despite the views of certain stakeholders outlined above, the evaluation does not recommend changes to the current course structure. Feedback from course participants, and most stakeholder organisations consulted to inform the evaluation, suggests that the course structure is meeting the needs of training participants and is supported by the industry peak bodies, licensed venue operators and liquor industry workers.

Furthermore, the changes proposed by certain stakeholders have the potential to significantly complicate, and increase the overall cost of completing, the training requirements. It is important to note that the primary goal of each course is not to provide workers with training tailored to a particular licensed premises environment, such as a packaged liquor store or nightclub. Rather, their purpose is to provide liquor industry workers with training that is relevant and appropriate to their role and broadly applicable across all types of licensed premises.

Finding 10: While most stakeholders were satisfied with the existing training course structure, some stakeholders suggested that certain courses should either be combined or divided into discrete topics to better meet the perceived needs of liquor industry workers.

Quality and relevance of industry training

Course participants reported high levels of satisfaction with the quality and relevance of the course content in the training they had completed (see Table 10). This finding was consistent across LT, ALT, RSA refresher training, and the RSA bridging course.

Table 10: Percentage of survey respondents that reported being satisfied or very satisfied with the quality and relevance of the course content

Training course	Quality of course content	Relevance of course content
Licensee Training (LT)	90%	89%
Advanced Licensee Training (ALT)	89%	90%
RSA Refresher Training	88%	88%
RSA Bridging Course	96%	95%

Finding 11: Training course participants are generally highly satisfied with the quality and relevance of industry training.

Method of delivery

While LT and ALT training participants generally reported high levels of satisfaction regardless of the method of training delivery (online, virtual classroom, physical classroom), the impact of the method of training delivery on the percentage of participants who were satisfied or very satisfied with the training delivery and format varied across courses (see Tables 11 and 12).

Table 11: Percentage of LT and ALT survey respondents that reported being satisfied or very satisfied with the delivery of the course, broken down by course and method of delivery

Training course	Online	Virtual classroom	Physical classroom
Licensee Training (LT)	90%	82%	92%
Advanced Licensee Training (ALT)	97%	89%	88%

Among LT participants, the percentage of participants who were satisfied or very satisfied with the training delivery was slightly higher among those who completed the course in a physical classroom (92%) or online (90%) than those who completed the course in a virtual classroom (82%). Among LT participants, the percentage of participants who were satisfied or very satisfied with the training format was slightly higher among those who completed the course in a physical classroom (87%) or online (89%) than those who completed the course in a virtual classroom (80%).

Table 12: Percentage of LT and ALT survey respondents that reported being satisfied or very satisfied with the format of the course, broken down by course and method of delivery

Training course	Online	Virtual classroom	Physical classroom
Licensee Training (LT)	89%	80%	87%
Advanced Licensee Training (ALT)	95%	78%	83%

Among LT participants, the percentage of participants who were satisfied or very satisfied with the training delivery was slightly higher among those who completed the course in a physical classroom (92%) or online (90%) than those who completed the course in a virtual classroom (82%). Among LT participants, the percentage of participants who were satisfied or very satisfied with the training format was slightly higher among those who completed the course in a physical classroom (87%) or online (89%) than those who completed the course in a virtual classroom (80%).

Among ALT participants, the percentage of participants who were satisfied or very satisfied with the training delivery was slightly higher among those who completed the course online (97%) than those who completed the course in a physical (88%) or virtual (89%) classroom. Among ALT participants, the percentage of participants who were satisfied or very satisfied with the training format was slightly higher among those who completed the course online (95%) than those who completed the course in a physical (83%) or virtual (78%) classroom.

Fewer RSA survey respondents who completed the course online reported being satisfied or very satisfied with their chosen method of course delivery (79%) than respondents who completed the course in a physical (97%) or virtual (100%) classroom. A few participants stated that the online course took too long to complete, noting that each module needed to be submitted for marking before proceeding. Others stated that it was useful to be able to proceed at their own pace.

Finding 12: RSA training course participants were more satisfied with their training if it was delivered face-to-face than online, Advanced Licensee Training course participants were more satisfied if their training was delivered online than face-to-face, and Licensee Training course participants reported little difference.

Course customisation

ATPs generally reported customising their courses to suit the needs of participants. Furthermore, some ATPs have an arrangement with a particular peak industry body whereby the peak body recommends the ATP to its members because its approach to delivering the training is more suitable to those types of businesses. For example, the CMAA reported that it directs its members to certain ATPs because it believes that they offer training that is better suited to club industry workers.

While ATPs reported customising their courses to suit the needs of participants, some stakeholders suggested that a greater consideration of the needs of regional businesses and specific types of venues (e.g. packaged liquor stores) would be beneficial in this process. For example, some survey respondents suggested that the training offered by ATPs tends to be overly focused on the needs of businesses in metropolitan areas. It was also suggested by a number of stakeholders that parts of the training are less relevant to businesses such as packaged liquor stores and that the courses could perhaps be better customised to meet the needs of workers from such businesses.

In response to this feedback, the evaluation recommends that, while liquor industry workers should be provided with training that addresses broad competencies across all types of licensed premises (as noted above), ATPs should ensure that appropriate consideration is given to the needs of regional businesses and specific types of venues (e.g. packaged liquor stores) when customising their courses.

Finding 13: While Approved Training Providers reported customising their courses to suit the needs of participants, some stakeholders suggested that a greater consideration of the needs of regional businesses and specific types of venues (e.g. packaged liquor stores) would be beneficial in this process.

Recommendation 6: While liquor industry workers should be provided with training that addresses broad competencies across all types of licensed premises, Approved Training Providers should ensure that, in customising their courses, appropriate consideration is given to the needs of regional businesses and specific types of venues (e.g. packaged liquor stores).

5.5 Meeting the needs of training participants

Updating course materials

While ATPs may choose to customise training materials, the Liquor & Gaming Sector Training & Access team is responsible for developing and updating the LT and ALT course materials. At present, the Sector Training & Access team is made aware of new or updated legislation, policies or programs by joining various working groups across L&GNSW. Updates to the training materials are made and distributed to ATPs as soon as possible.

Some ATPs raised concerns about this process and stated that the materials were not updated in a sufficiently timely manner. For example, one ATP noted the ALT materials included information about outdated disciplinary schemes. Another ATP suggested that they had not been receiving any updates at all and had taken the initiative to provide participants with updated information or encourage them to subscribe to information distribution lists such as L&GNSW eNews. This ATP suggested that an online platform should be available for ATPs to easily access updated content.

Although a process already exists for identifying potential updates to the course content, it is recommended that the Sector Training & Access team regularly consult with other L&GNSW business units. This could occur in a more systematic way, where a single working group

involving all L&GNSW business units is formed for the purpose of assisting the Sector Training & Access team in identifying legislative or regulatory changes to be included in the training materials. A dedicated working group may also help the Sector Training & Access team to be aware of upcoming legislative or regulatory changes.

Several other ATPs stated that the process of updating training materials was inefficient, resource intensive and time consuming. They argued that, while L&GNSW provides them with the updates, the materials need to be customised and approved according to the required standards for the ATP. It was suggested that L&GNSW should send a package of updates at certain points during the year, rather than send ATPs frequent, minor updates.

The Sector Training & Access team stated that sending a package of updates at certain points during the year is not ideal because major legislative or regulatory changes, such as the night time economy reforms, may occur at any point during the year and often at short notice. Therefore, ATPs may be delivering outdated content for several months if a package of updates was to be distributed at certain points during the year.

However, it is recommended that, where possible, ATPs should be given sufficient forewarning that updated course content will be made available to them, so they have more certainty and time to prepare for the updates. This may assist ATPs to better plan for future updates.

Finding 14: While processes are in place to review and update course content, some stakeholders claimed that training manuals are not always updated in a sufficiently timely manner.

Recommendation 7: The Liquor & Gaming Sector Training & Access team should regularly consult with relevant business units to identify and respond to any gaps in the curricula.

Recommendation 8: L&GNSW should provide Approved Training Providers with sufficient forewarning, where possible, that updated course content will be made available to them, so they have more certainty and time to prepare for the updating of the curricula.

Plain English materials and support for ESL participants

While some ATPs raised concerns about the process for updating materials, many ATPs were satisfied with the content and stated that they had received positive feedback about the content from their training participants.

Many stakeholders, including the AHA, RDA and The Star Casino also stated that the content is appropriate and presented in a plain English format. Some stakeholders, including The Star Casino and CMAA, stated that although the content may be dense, a sufficient level of detail is required so that training participants fully understand their obligations under the legislation.

However, some stakeholders raised concerns about the plain English format of the materials. The OSBC and Liquor & Gaming Licensing stated that the training manuals are too long and dense, making it difficult for participants to understand the content or find relevant

information when additional guidance is needed. This could be particularly difficult for participants who speak English as a Second Language (ESL). The OSBC also argued that the training materials should meet the needs of ESL participants and should not be a barrier to starting a business.

Liquor & Gaming Licensing suggested that the training materials should be pitched at a general community literacy level, in line with approved accessibility standards. Other suggestions by stakeholders for improving the accessibility of training materials included delivering the courses in a more dynamic way through videos and role plays, using more case studies or providing participants with a stand-alone resource that presents course information in a summarised, concise format.

It should be noted that the Liquor & Gaming Sector Training & Access team engaged education specialists to undertake a plain English review of RSA, LT and ALT resources. One of the education specialists also developed the RSA refresher course. The purpose of the review was to ensure that content was written in plain English language, consistent in form and tone across all courses, and appropriate to the relevant participant cohort.

RSA refresher, RSA bridging, LT and ALT survey respondents were asked whether they thought the training materials were easily understood and clear. Most survey respondents indicated that the course materials were easily understood and clear (see Table 13).

Table 13: Percentage of survey respondents who stated that the training materials were easily understood and clear

Training course	% of survey respondents who stated that the training materials were easily understood and clear
Licensee Training (LT)	97%
Advanced Licensee Training (ALT)	97%
RSA Refresher Training	92%
RSA Bridging Course	99%

ATPs were also asked to provide data on the number of training participants who did not pass the LT or ALT assessments after three attempts. Training participants are permitted three attempts to successfully complete assessments under the TITF. This gives participants an opportunity to revise specific content rather than repeating the entire course.

Of the seven ATPs currently delivering LT and ALT courses, six provided the evaluation with information. Two ATPs were unable to provide the required data, two ATPs stated that no training participants failed the assessment after three attempts and two stated that a small percentage of participants did not pass the assessment after three attempts. Data provided

by one of the ATPs suggested that, of the few participants who do not pass after three attempts, 50% (5/10) were ESL participants.

ATPs noted that reasonable adjustments are made for ESL participants by offering one-one-one support with the trainer, providing smaller classrooms, suggesting face-to-face via virtual learning or allowing interpreters to assist the participant. One ATP noted that while the course content can be tailored, the assessment cannot be tailored. Some ATPs screen participants to ensure they have sufficient English language skills. If the ATP believes that the participant does not have sufficient English language skills to pass the assessment, they are refunded the course fee.

Liquor & Gaming Licensing argued that participants should not be turned away and should be supported to understand the content. Some stakeholders, including Liquor & Gaming Licensing and Compliance, suggested that it would be useful to translate the training materials. One ATP noted that, even if a participant is supported by an interpreter during the course, much of the content is lost in translation.

Translating materials was considered by Liquor & Gaming Sector Training & Access when the TITF was introduced. It was decided that this would not be the best approach given that participants would need to read and understand legislation and other information such as signage in English. Translating materials may be impractical and resource intensive given that regular updates to content are made.

Some stakeholders, including some ATPs and ILGA, suggested that the courses require a minimum level of English language proficiency due to the legislative content. In addition, stakeholders, including some ATPs, RDA and CMAA, argued that it is important for ESL participants to develop their English language skills to prepare for situations where they may have to refuse the service of alcohol to a patron or liaise with a Police or L&GNSW inspector.

A minimum level of English language proficiency has already been established for the ASQA accredited RSA unit. It could be assumed that participants attempting to complete the LT or ALT course have already met the English language requirements of the RSA course. However, the LT and ALT courses may require a higher level of English proficiency due to the detailed legislative and regulatory information presented in these courses.

Given that a minimum level of English language proficiency is required for the RSA course, it may be appropriate to recommend a minimum level of English language proficiency for the LT and ALT courses to training participants. This would ensure training participants are aware of the language skills required to successfully complete the course prior to enrolment. A recommended minimum level of English language proficiency would not negate the need for ATPs to provide support to ESL students.

Although most stakeholders were satisfied with the plain English format of course content, the training materials could be reviewed regularly to ensure updates are also communicated in a plain English format. ATPs could also be encouraged to expand their use of case studies, videos, role plays or other practical learning methods. Some stakeholders, including The Star Casino and some ATPs, noted that case studies support participants to engage

with, and better understand, the materials. Liquor & Gaming Licensing also noted that case studies could be used to help tailor content for different licence types.

The CMAA noted that videos and role plays can be used to support participants with different learning styles. Videos are currently being used for the RSA refresher and RSA bridging courses and many (93% of RSA bridging and 91% of RSA refresher) survey respondents believe they added value to the course. The CMAA also noted that role plays during face-to-face courses could be beneficial for ESL participants.

Finding 15: While most industry stakeholders were satisfied with the detailed and comprehensive nature of the training curriculum, some suggested that the training manuals should be presented in a 'Plainer-English' format.

Finding 16: Training providers reported that very few course participants were unable to pass the assessment after three attempts.

Finding 17: While most training providers provide some level of support to participants that speak English as a Second Language (ESL), some screen participants prior to course completion to ensure that they have sufficient English language skills to meet the course requirements.

Recommendation 9: L&GNSW should encourage Approved Training Providers to expand their use of case studies, videos, role play, and other practical learning methods during training delivery.

Recommendation 10: L&GNSW should conduct regular reviews of training content to ensure it is written in a plain English format and recommend a minimum level of English language competency for Licensee and Advanced Licensee Training

Course duration

One ATP stated that the skills and knowledge outcomes required in the RSA course are too demanding and suggested that many participants do not remember what they learn on the day. They noted that those who are new to the liquor industry will most likely need more than six hours to complete the course and suggested that the course could potentially be delivered as part of a qualification over the course of a week. The ATP stated that it is difficult to deliver the RSA course face-to-face as the content cannot be adequately covered in six hours.

However, the ATP also stated that the advantage of online training is that participants can learn at their own pace. This statement was supported by some RSA survey respondents, who commented that it was useful for them to complete the online course at their own pace. A few RSA survey respondents commented that the online course was too long.

Some ATPs stated that the length of the LT course was appropriate but that there is potential to reduce the duration of the ALT course for more experienced operators. One ATP suggested that the courses could be delivered more flexibly if the course duration was not

specified. However, another ATP stated that some of their employees had participated in the courses and found the six-hour duration for the LT and ALT courses to be suitable.

Finding 18: Most stakeholders did not raise concerns about the duration of the RSA, Licensee Training and Advanced Licensee Training courses.

Tier 2 premises

Tier 1 premises refer to licensed premises where the licensee, approved manager or club secretary is required to complete LT. Premises that fall within the 'Tier 1' category and trade after midnight "on a regular basis" are defined as Tier 2 premises. Tier 2 premises are required to complete ALT because they are exposed to higher risks. One stakeholder believed the term "regular basis" may be confusing to applicants and licensees and should be removed. They suggested that venues that trade past midnight at special or irregular times in a year should be required to complete ALT because those venues will be exposed to higher risks on the occasions when they trade later.

Liquor & Gaming Policy noted that the term "regular basis" is prescribed in the Liquor Regulation and is consistent with established trading hours risk loadings under the Annual Liquor Licensing Fee (ALLF) scheme. The risk loading is payable if a venue trades for certain hours after midnight on a "regular basis"; that is, more than 12 times per year (see clause 12). Liquor & Gaming Policy noted that any change to the term "regular basis" would need further consideration, particularly in relation to its impact on the ALLF scheme.

ILGA noted that trading hours do not indicate risk in all cases. ILGA suggested that other factors, such as the size of the venue and compliance history, contribute to different levels of risk. Liquor & Gaming Licensing stated that the definition of "high-risk" should reflect the evidence base. Given the diversity of views expressed by stakeholders, and the potential policy implications of any definitional changes, it is recommended that L&GNSW should examine these issues raised by stakeholders in relation to the definition of a 'Tier 2' venue.

Finding 19: While most stakeholders did not raise concerns about the current definition of a 'Tier 2' venue, which is used to determine which licensees must complete Advanced Licensee Training, a number of areas for further consideration were identified.

Recommendation 11: L&GNSW should examine issues raised by stakeholders during the evaluation in relation to the definition of a 'Tier 2' venue.

Packaged liquor - online sales/delivery

While current LT resources include some references to packaged liquor stores operating in the online-only sales/delivery space, some LT survey respondents commented that the course content was not always relevant to packaged liquor stores or online packaged liquor providers. That said, RDA commented that the LT course generally meets the needs of packaged liquor licensees in understanding their obligations and compliance risks.

However, based on a consideration of the training materials and feedback from multiple survey respondents, it would appear that the training requirements do not fully meet the

needs or respond to the specific operational risks of packaged liquor delivery services. This issue will be addressed, at least in part, during development of the new Responsible Supply of Alcohol Training course for same-day alcohol delivery workers in consultation with the RDA.

Finding 20: The training requirements do not fully meet the needs or respond to the specific operational risks of packaged liquor delivery services, though the development of a new Responsible Supply of Alcohol Training course for same-day alcohol delivery workers will help to address this issue.

Virtual and Online training

Face-to-face and online training are offered for the RSA, LT and ALT courses. The RSA bridging and refresher courses are only offered online. Online delivery involves self-paced online modules and assessments. Participants can complete this at any time and do not have a facilitator to guide them through the course. Recently, 'virtual' classrooms have been introduced for the LT and ALT courses. Participants join a virtual classroom, via skype or a similar application, at a specific time, are guided by a facilitator and joined by their peers. In collecting data, ATPs record participants as having completed training either 'online' or in a 'classroom'. 'Classroom' includes both face-to-face and virtual delivery.

Of the training participants who completed the updated RSA course introduced in July 2018, 39% completed the course online and 61% completed it in a classroom. For the LT course, there was little difference between the percentage of liquor industry workers choosing online (49%) or classroom (51%) delivery. There was also little difference in take-up of online or classroom delivery of the LT course when comparing take-up in metropolitan and non-metropolitan areas (see Figure 8).

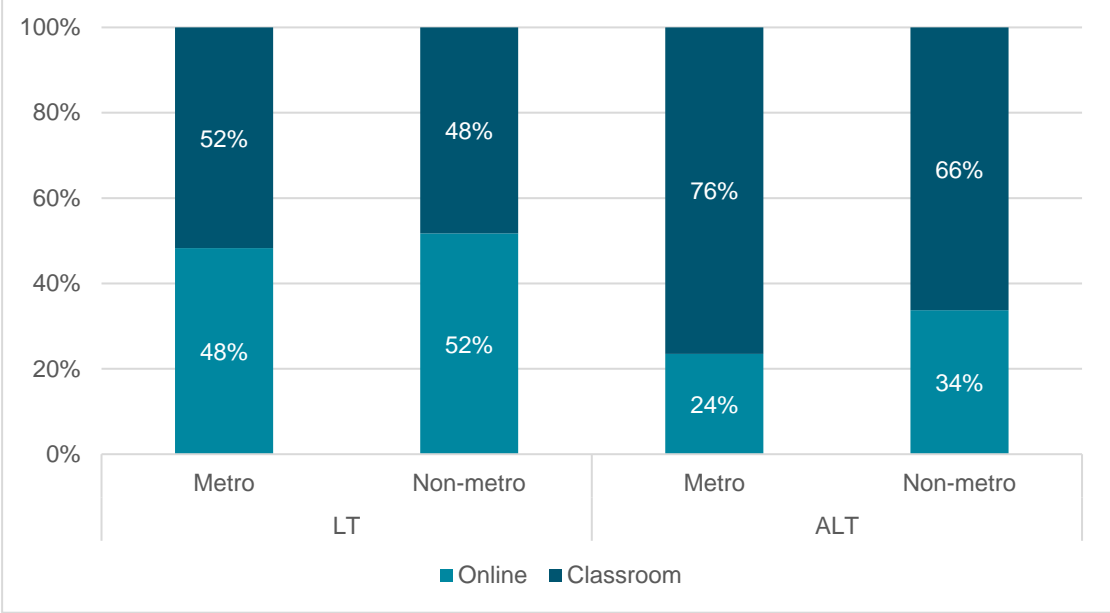
However, some differences were observed in the take-up of delivery options for the ALT course. Of all liquor industry workers who completed the course, 26% completed it online and 74% completed it in a classroom. When comparing take-up in metropolitan and non-metropolitan areas, a slightly higher proportion of liquor industry workers in non-metropolitan areas (34%) completed the training online compared to metropolitan areas (24%) (see Figure 8).

Many stakeholders stated that face-to-face training is generally the preference for liquor industry workers. AHA argued that that the COVID-19 pandemic was a key driver of uptake of online training. By contrast, RDA stated that their members prefer online training because they can complete the training at their own pace, and it is also more affordable (see section 5.3). RDA also argued that although face-to-face training is a preference in non-metropolitan areas, online training offers greater flexibility and address some of the barriers experienced by participants in non-metropolitan areas.

Some ATPs noted that improvements in technology and access to the internet are making it easier to deliver training online. They highlighted the benefits of 'virtual classrooms' where participants can experience similar benefits to face-to-face training by interacting with the

trainer and their peers through cameras. The Liquor & Gaming Sector Training & Access team agree that virtual classrooms are a good alternative to face-to-face training.

Figure 8: Chosen delivery method for the LT and ALT courses, by region



However, some stakeholders, such as the OSBC and some ATPs, noted that access to online training in non-metropolitan areas can be challenging because face-to-face training is preferred and internet connection in these areas can be poor. In addition, there are fewer opportunities for face-to-face training and additional cost and time may be involved for participants due to the need to travel.

TAFE NSW is establishing ‘Connected Learning Centres’ which will allow participants to learn with a facilitator and other students via video conferencing. The Centres will allow access to virtual classrooms across urban and regional NSW with each centre also offering students the required administrative and Language, Literacy & Numeracy support, and supervision during assessments to ensure adequate student support and integrity of training. The Centres will provide classroom facilities and access to internet for training participants, where the facilitator may appear via video conference. This option may help to improve access to training for participants in non-metropolitan areas.

It remains appropriate that a mix of delivery options are available to training participants, particularly as preferences may differ across different participant cohorts. While some stakeholders consider face-to-face training to be the preference, this option was not available during a large part of 2020 due to the COVID-19 pandemic. Some ATPs noted that moving to virtual or online formats during 2020 has demonstrated that technology can be used to support new and flexible ways of delivering training. This is evident through the increased use of ‘virtual classrooms’ and the emerging TAFE NSW Connected Learning Centres.

Finding 21: Virtual and online training has been offering greater convenience, flexibility and affordability for a significant number of liquor industry workers, particularly during the COVID-19 pandemic.

5.6 Value for money, other impacts and improvements to the framework

Course prices

While training fees were identified as a barrier for some course participants (see section 5.3), stakeholder organisations generally indicated that they were satisfied with the price of training courses under the TITF, and there was little feedback from stakeholders to suggest that they felt the training was not providing value for money. While costs to licensees cannot easily be compared to other jurisdictions as they do not have training courses equivalent to LT and ALT, costs for RSA training in NSW are significantly higher than other jurisdictions (which only require SITHFAB002¹⁸ certification) as outlined in section 5.3.

When developing the courses under the TITF, L&GNSW provided ATPs with a pricing expectation for the LT and ALT courses of around \$500, though it supported the pricing being subject to market forces. Stakeholders such as the AHA expressed support for this approach, arguing that having competition has meant that prices have been effectively capped. Others, including one ATP and The Star Casino, suggested the imposition of a formal price cap to ensure that training courses remain affordable for participants. ILGA, on the other hand, argued that course prices should be standardised across ATPs and should not be subject to competition across providers at all.

Some stakeholders, such as the CMAA and the OSBC, suggested that L&GNSW publish course prices for each ATP on its website to promote competitive tension among ATPs. RDA argued that this may be challenging for L&GNSW because ATPs change their prices from time to time and special pricing arrangements exist between some peak industry bodies and selected ATPs. For example, RDA members receive a discounted rate with their preferred training provider. These challenges are recognised by the evaluation. However, it is recommended that L&GNSW provide a broad statement regarding the price range for the LT and ALT courses. Greater awareness of the different course prices offered across providers may encourage participants to search for a provider that best meets their needs and may promote competitive tension among training providers.

Given that publishing LT and ALT prices on the L&GNSW website may not be feasible, it is recommended that clear information on how to access course pricing should be available to participants. Participants should be encouraged to compare the prices and offerings of multiple providers before selecting a preferred provider. In addition, the new ATP Mapping Tool being developed by L&GNSW is expected to make it easier for people to find suitable ATPs and access their websites to compare course offerings.

The OSBC also suggested that Government, in response to the detrimental impact of the COVID-19 pandemic on the hospitality industry, could consider providing subsidies and/or rebates to liquor industry businesses whose staff complete industry training. The frequency of staff turnover at many licensed premises would make administration of such a scheme

¹⁸ The national unit of competency for “Provide responsible service of alcohol”.

particularly difficult, and subsidies may have to be made to individuals rather than businesses.

Such a scheme would also impose a significant cost burden upon the Government. ILGA similarly suggested that subsidies could be considered for workers in regional areas who have to travel to access face-to-face training. While face-to-face training may be preferred by some workers, the availability of online training makes the case for subsidies relating to travel less compelling.

Finding 22: While stakeholders are generally satisfied with the training course prices, some claim more should be done to promote competition among training providers.

Recommendation 12: The L&GNSW website should (a) provide a broad statement regarding the price range for the Licensee and Advanced Licensee training courses, and (b) encourage participants to directly contact Approved Training Providers to confirm course prices (including via provision of links to provider websites where appropriate).

Data collection, monitoring and evaluation

Shortcomings were identified with some internal data collection and monitoring processes that made it difficult to determine whether some industry workers were compliant with the LT and ALT training requirements. For example, and as discussed in section 5.2, an analysis of OneGov data in relation to completion of LT and ALT requirements by “current” licensees revealed that a significant number of those required to complete the training did not have a RSA competency card. Of these, 99% were recorded as having commenced their role before 1 January 2020.

It is likely that some of these cases are the result of data entry errors, with the commencement date for some roles stretching back as far as 1905. However, for a large proportion of the positions listed, it is difficult to determine whether these industry workers are active in these roles without competency cards or whether these positions are no longer active and the information recorded in OneGov is erroneous or out-of-date.

Other data collection and monitoring shortcomings were found in relation to those who have been directed by ILGA or L&GNSW to undertake training. As discussed in section 5.2, while L&GNSW and ILGA have directed a number of licensees to complete LT or ALT, there is currently no process in place to report on and monitor compliance by these licensees in response to this direction. The evaluation found that information regarding directions issued by ILGA to undertake training were not easily accessible and had to be manually extracted from individual Compliance records. There was also no strategy in place to monitor the completion of training in response to these directions and ensure that such completion was recorded and reported on.

Given the shortcomings identified above, it is recommended that a TITF data collection and monitoring strategy be developed to address these shortcomings. This should include a strategy to improve the accuracy and currency of training-related data in OneGov. In addition to improved monitoring, this would allow for a future evaluation to examine the success of

any measures introduced in response to the current evaluation recommendations to improve compliance with the training requirements.

Implementation of recommendations 1 and 13 will help L&GNSW to potentially examine the longer-term contribution of the TITF to the reduction of alcohol-related harm in NSW. However, L&GNSW should, within three years of implementation of the recommendations in this report, assess the need for any further evaluation of the TITF to ensure that it is able to respond to the evolving needs of industry, regulators and the community into the future.

Finding 23: Shortcomings were identified with some internal data collection and monitoring processes that made it difficult to determine whether some industry workers were compliant with the training requirements.

Recommendation 13: Given current limitations in relation to data collection and monitoring, a TITF data collection and monitoring strategy should be developed to ensure appropriate and efficient on-going monitoring of key TITF performance measures.

Recommendation 14: L&GNSW should (a) within three years of implementation of the recommendations in this report, assess the need for any further evaluation of the TITF to ensure that it is able to respond to the evolving needs of industry, regulators and the community into the future; and (b) ensure that any such evaluation includes a focus on the success of any measures introduced to improve compliance with the training requirements.

Appendix A: Evaluation questions

The key evaluation questions related to each objective include:

Objective 1: To assess the extent to which the TITF training courses are meeting their program objectives

- ▲ Does the new training framework effectively build on liquor industry staff knowledge of responsible service of alcohol?
- ▲ Do the training courses satisfactorily explain the responsibilities of liquor industry workers, managers and licensees in NSW?
- ▲ Do course participants have a better understanding of their responsibilities after completing the course/s?
- ▲ Do stakeholders feel that the effectiveness of the current training framework has been strengthened compared to the previous training framework?
- ▲ What, if any, are the perceived improvements by stakeholders to the operation and management of licensed venues in NSW arising from participation in the training?
- ▲ Do licensees, approved managers and club secretaries of venues operating in higher risk environments feel better equipped and prepared to manage those venues?

Objective 2: To assess the uptake of new courses offered under the framework

- ▲ How many, and/or what proportion of, NSW liquor industry workers have completed new RSA training, with both National and NSW competencies?
- ▲ How many, and/or what proportion of, NSW liquor industry workers that have completed the new RSA training have completed the training online?
- ▲ How many, and/or what proportion of, NSW liquor industry workers have completed online RSA Refresher training?
- ▲ How many, and/or what proportion of, NSW liquor industry workers have completed the online NSW RSA Bridging course?
- ▲ How many licensees, approved managers and club secretaries have completed the Licensee training? How many unique licensed premises are these individuals representing? Of those completing Licensee Training, what proportion of these completed the course in classroom, online or virtual classroom environments?
- ▲ How many licensees, approved managers and club secretaries have completed the Advanced Licensee training? How many unique licensed premises are these individuals representing? Of those completing Advanced Licensee Training, what proportion of these completed the course in classroom, online or virtual classroom environments?
- ▲ How many licensees, approved managers and club secretaries have completed the Licensee or Advanced Licensee training subject to direction by L&GNSW or the Independent Liquor & Gaming Authority? How many unique licensed premises are these individuals representing?
- ▲ How many industry workers have completed the Licensee or Advanced Licensee Training as part of their professional development or for career progression? (i.e. not mandated to complete licensee training)?

- ▲ How many licensees, approved managers and club secretaries have failed to comply with their licensee training requirements? How many of these were approved between 1 September 2018 and 31 March 2019, post 1 April 2019, or were existing licensees, approved managers or club secretaries as at 1 September 2018? How many of these were newly appointed approved managers or club secretaries? How many of these were transfers? What proportion of each category of non-compliant licensees, approved managers or club secretaries are based in regional or rural areas?
- ▲ How many existing licensees, approved managers or club secretaries completed the Licensee or Advanced Licensee training after their competency card expiry date? How many, and what proportion of these individuals, represent commercial clients (i.e. Coles, Woolworths, Aldi etc.)?
- ▲ What proportion of course participants are based in regional or rural areas?

Objective 3: To assess whether there are any facilitators or barriers relating to the uptake of courses under the framework

- ▲ What factors, if any, are facilitating participation in the courses?
- ▲ What barriers, if any, are affecting participation in the courses and how are they being managed?
- ▲ Has the strategy for promoting and adapting the framework by L&GNSW been effective?
- ▲ Are there sufficient opportunities for participants in regional areas to attend face-to-face training? Did the availability of face-to-face courses in regional or rural areas contribute to failure to comply with licensee training requirements for licensees, approved managers and/or club secretaries?
- ▲ What are the costs associated with the training courses for liquor industry workers, approved managers, club secretaries and licensees?

Objective 4: To assess the level of stakeholder satisfaction with the course and/or framework

- ▲ Do stakeholders understand the purpose of the training requirements?
- ▲ How satisfied are stakeholders with the training requirements?
- ▲ How satisfied are stakeholders with the quality and relevance of course content?
- ▲ Are course attendees satisfied with the delivery and format of the training?
- ▲ How satisfied are stakeholders with the RSA Bridging course assessment framework?

Objective 5: To assess whether the courses and/or framework are meeting the needs of training participants

- ▲ Are the training courses easy to access for participants?
- ▲ Do the methods of delivery (classroom, virtual classroom and online) of the training courses meet the needs of participants?
- ▲ Are some methods of delivery (classroom, virtual classroom and online) more effective than others?
- ▲ Is the prescribed delivery time frame for the Licensee and Advanced Licensee training courses appropriate to cover the course content?
- ▲ Are there any gaps in methods of delivery of the training courses?
- ▲ Are the training materials provided in a plain English format?

- ▲ Are approved training providers taking measures to support participants with English language or learning difficulties? What strategies do ATPs use, and how effective are they, to support participants with English language or learning difficulties?
- ▲ How many participants have failed the Licensee or Advanced Licensee training after three (3) attempts? How many have re-enrolled and completed the training? What strategies do ATPs use, and how effective are they, to support/manage participants who fail the training?
- ▲ How many participants have failed the RSA Bridging course after three (3) attempts? What is the average number of attempts taken by participants to pass the training? What is the average time taken to complete the training?
- ▲ Are there any gaps or shortcomings in course content? Are there additional topics that could be included in the training courses?
- ▲ Are there adequate processes in place to review and update course content?
- ▲ Are there any gaps in the accessibility of the training courses?
- ▲ Are there any gaps or shortcomings for first-time entrants to the liquor industry?

Objective 6: To assess whether the framework has improved the knowledge and skill base of frontline workers, licensees, approved managers and club secretaries, and contributed to improvements in the operation and management of licensed venues

- ▲ Do participants report improvements in their knowledge and skills after completing the training courses?
- ▲ Have the training courses contributed to perceived improvements in the operation and management of licensed venues according to training participants?
- ▲ What improvements in the operation and management of licensed venues can be attributed, at least in part, to the participation of frontline workers, licensees, approved managers and club secretaries in the training courses?
- ▲ Where improvements in the operation and management of licensed venues were attributed to participation in training, did the extent of improvements differ based on the training course completed?
- ▲ Does the liquor industry consider the training courses meet the training needs of the workers?

Objective 7: To consider value for money and any other impacts of, and possible improvements to, the framework

- ▲ Do the benefits provided by the training framework represent value for money?
- ▲ Have there been any unintended impacts of the framework?
- ▲ Are there any other potential improvements that could be made to the framework?
- ▲ What further evaluation of the training framework may be required to ensure that it is able to respond to the evolving needs of industry, regulators and the community into the future?
- ▲ What further evaluation of the training framework could potentially examine its longer-term contribution to the reduction of alcohol-related harm in NSW?

Appendix B: RSA training survey

Introduction

On 1 July 2018, Liquor & Gaming NSW (L&GNSW) introduced a new Responsible Service of Alcohol (RSA) framework designed to align NSW RSA training with national frameworks. It allowed those completing RSA training in NSW to gain the National RSA certification along with the NSW-specific RSA competency to work in the NSW liquor industry. The training also focussed on delivering NSW specific training to familiarise frontline workers with their responsibilities under NSW liquor legislation.

This survey seeks your feedback on the records you received on completion of RSA training, the delivery method of your training, the training experiences of new entrants to the liquor industry, and whether you found the training accessible. The survey should take approximately 10 minutes.

*¹⁹ 1. Have you undertaken an RSA training course since 1 July 2018?

- Yes
- No

2. Did you receive your Statement of Attainment for Provide Responsible Service of Alcohol (SITHFAB002) after completing RSA training?

- Yes
- No

3. Did you receive your NSW RSA Interim Certificate on course completion?

- Yes
- No

4. Were you in a metropolitan or regional area when you completed RSA training?

- Metropolitan
- Regional

5. What delivery method did you use for RSA training?

- Online
- Virtual classroom
- Face-to-face

6. Which of the following best describes why you selected your chosen delivery method over the alternatives?

- I prefer this method of training

¹⁹ An asterisk (*) indicates that the survey question was mandatory.

- I wasn't aware of other training methods
- Face-to-face training was difficult to access
- Online/virtual classroom is difficult to access due to IT or internet issues
- Online/virtual classroom is COVID-safe
- Other (please specify)

7. Did you find your chosen delivery method to be satisfactory?

- Yes
- No
- If not, why not?

8. Would you recommend undertaking RSA training via your chosen delivery method to others?

- Yes
- No
- If so, why? If not, why not?

9. The current renewal timeframe for RSA Competency Cards is set at 5 years. If an annual or 3-yearly option for renewal were to be available at an appropriate price, would you consider a shorter renewal timeframe?

- Yes
- No
- If so, why? If not, why not?

* 10. Was the RSA training course that you completed since 1 July 2018 your first experience completing RSA training in NSW?

- Yes
- No

11. Do you think there were any gaps or shortcomings in the RSA training course?

- Yes
- No
- If so, please explain:

12. Did you experience any barriers to access the RSA training course? Please select all that apply.

- Cost
- Lack of awareness about training options
- Face-to-face training is not offered on a regular basis
- Face-to-face training is not offered in my area
- I did not have access to technology needed for online/virtual classroom training
- Other (please specify)

* 13. Did you have any difficulties when undertaking the RSA training course?

- Yes
- No

14. Did you have difficulties with any of the following when undertaking the RSA course?

- English language difficulty
- Learning difficulty
- Other (please specify)

15. How did your training provider support you during the training?

Appendix C: RSA refresher training survey

1. Do you understand why existing RSA holders are required to undertake the RSA Refresher Course?

- Yes
- No
- If not, why not?

2. Do you support this training requirement?

- Yes
- No
- If not, why not?

3. Do you think that this training requirement has been adequately communicated by Liquor & Gaming NSW?

- Yes
- No
- If not, why not?

4. Did the course satisfactorily explain the responsibilities of liquor industry workers in NSW?

- Yes
- No
- If not, why not?

5. Do you think completing the course has refreshed your understanding of your responsibilities as a liquor industry worker?

- Yes
- No
- If not, why not?

6. Please rate the course on the following:

	Very dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied
Quality of the course content					
Relevance of the course					

content					
Format of the course					
Delivery of the course					

7. Please comment on any improvements that you would recommend.

8. Were you satisfied with the format of the assessments?

- Yes
- No

9. Were the course materials easily understood and clear?

- Yes
- No

10. Did the videos add value to the course content?

- Yes
- No

11. Did you have any issues completing the course?

12. Do you think that completing the RSA Refresher Course has contributed to your skill development?

- Yes
- No
- Please explain why or why not.

Appendix D: RSA bridging course survey

1. Do you understand why interstate RSA holders are required to undertake the NSW RSA Bridging Course?

- Yes
- No

2. Do you think that the requirement to complete the NSW RSA Bridging course for interstate RSA holders has been adequately communicated by Liquor & Gaming NSW?

- Yes
- No
- If not, why not?

3. The NSW RSA Bridging Course has been developed so that interstate workers can become familiar with NSW liquor laws. Do you support the requirement for the NSW RSA Bridging Course for interstate RSA holders?

- Yes
- No

4. Did the course satisfactorily explain the responsibilities of liquor industry workers in NSW?

- Yes
- No
- If not, why not?

5. Do you have a better understanding of your responsibilities after completing the course?

- Yes
- No
- If not, why not?

6. Please rate the course on the following:

	Very dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied
Quality of the course content					
Relevance of the course					

content					
Format of the course					
Delivery of the course					

7. Please comment on any improvements that you would recommend.

8. Were you satisfied with the format of the assessments?

- Yes
- No

9. Were the course materials easily understood and clear?

- Yes
- No

10. Did the videos add value to the course content?

- Yes
- No

11. Did you have any issues completing the course?

12. Do you think that completing the RSA Bridging Course has contributed to your skill development?

- Yes
- No

Please explain why or why not.

Appendix E: Licensee Training survey

1. Do you understand why licensees, approved managers, and club secretaries are required to undertake Licensee Training?

- Yes
- No

2. Do you support this training requirement?

- Yes
- No
- If not, why not?

3. Do you think that this training requirement has been adequately communicated by Liquor & Gaming NSW?

- Yes
- No
- If not, why not?

4. Did you complete Licensee Training because you were required to by L&GNSW or to contribute to your professional development/career progression?

- I am completing the training because I was required to by L&GNSW
- I am completing the training to contribute to my professional development/career progression
- Both
- Other (please specify)

5. Did the course satisfactorily explain the responsibilities of industry workers, managers and licensees?

- Yes
- No
- If not, why not?

6. Do you have a better understanding of your responsibilities after completing the course?

- Yes
- No
- If not, why not?

7. Please rate the course on the following:

	Very dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied
Quality of the course content					
Relevance of the course content					
Format of the course					
Delivery of the course					

8. Please comment on any improvements that you would recommend.

9. Were the course materials easily understood and clear?

- Yes
- No

10. In what type of environment did the course you attended take place?

- Physical classroom
- Virtual classroom
- Online

11. Was the course location accessible for you?

- Yes
- No
- N/A (virtual classroom/online)
- If not, why not?

12. What barriers, if any, did you experience in completing the course?

13. Has completing the course improved your knowledge?

- Yes
- No
- Please explain why or why not.

14. Do you think that completing the Licensee Training course has contributed to your skill development?

- Yes
- No
- Please explain why or why not.

15. Do you expect improvements in the operation and management of your venue having completed the Licensee Training course?²⁰

- Yes
- No
- If yes, what improvements do you expect to observe?

²⁰ Those who completed the course prior to 16 March 2020 were asked “15. Has completing the Licensee Training course contributed to improvements in the operation and management of your venue?”.

Appendix F: Advanced Licensee Training survey

1. Do you understand why those who operate a business in a higher risk environment are required to undertake Advanced Licensee Training?

- Yes
- No

2. Do you support this training requirement?

- Yes
- No
- If not, why not?

3. Do you think that this training requirement has been adequately communicated by Liquor & Gaming NSW?

- Yes
- No
- If not, why not?

4. Did you complete Advanced Licensee Training because you were required to by L&GNSW or to contribute to your professional development/career progression?

- I am completing the training because I was required to by L&GNSW
- I am completing the training to contribute to my professional development/career progression
- Both
- Other (please specify)

5. Did the course satisfactorily explain the responsibilities of industry workers, managers and licensees working in higher risk venues?

- Yes
- No
- If not, why not?

6. Do you have a better understanding of your responsibilities after completing the course?

- Yes
- No
- If not, why not?

7. Please rate the course on the following:

	Very dissatisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Very satisfied
Quality of the course content					
Relevance of the course content					
Format of the course					
Delivery of the course					

8. Please comment on any improvements that you would recommend.

9. Were the course materials easily understood and clear?

- Yes
- No

10. In what type of environment did the course you attended take place?

- Physical classroom
- Virtual classroom
- Online

11. Was the course location accessible for you?

- Yes
- No
- N/A (virtual classroom/online)
- If not, why not?

12. What barriers, if any, did you experience in completing the course?

13. Has completing the course improved your knowledge?

- Yes
- No
- Please explain why or why not.

14. Do you think that completing the Advanced Licensee Training course has contributed to your skill development?

- Yes
- No
- Please explain why or why not.

15. Do you expect improvements in the operation and management of your venue having completed the Advanced Licensee Training course?²¹

- Yes
- No
- If yes, what improvements do you expect to observe?

²¹ Those who completed the course prior to 16 March 2020 were asked “15. Has completing the course contributed to improvements in the operation and management of your venue?”