



Training Product Submission

This form facilitates [Step 5.1 Submission of draft training products to the Assurance Body of the Training Package Organising Framework \(TPOF\) Process Requirements](#).

Completing this form and submitting the required information, including the attachments, provides the Training Package Assurance (TPA) team with the necessary information to assess your Training Product Submission (the submission) against the TPOF. This is an opportunity to describe how the processes you have applied to develop your products and the products themselves comply with the requirements of the TPOF.

Refer to the Training Package Assurance (TPA) Submission Compliance Guide for detailed information about the evidence required for your submission.

Components of the submission include:

- this form
- completed attachments including the Companion Volume Implementation Guide

About this form

There are three sections to this submission form:

Section 1: Submission Details

Section 2: Submission Evidence

Section 3: CEO Declaration

Unless otherwise indicated, you must provide a response to each part of each question.



This symbol has been used to indicate where attachments and/or additional information must be uploaded with the submission.

Submission to the Assurance Body

This form and the required attachments must be uploaded to the relevant activity folder in the TPA GovTEAMS Community. Once all documents have been uploaded, email the TPA team at TrainingPackageAssurance@dewr.gov.au with the Project ID and Title to advise the submission is ready for assurance.

Incomplete submissions, including where there is insufficient or missing detail in the submission form and/or attachments, will be returned to you and the assurance process will be paused until the required information is received.

One form of evidence may satisfy multiple questions. A checklist is provided at the end of this document to assist you to ensure your submission is complete. You can use the column titled 'Evidence Reference' in the checklist to identify the document title of the specific evidence in your submission, alternatively, you may prefer to produce your own cover sheet to accompany the submission.

Assistance completing this form

Please refer to the TPA Submission Compliance Guide TPOF 1 July 2025 for information about how the TPA team will review the submission, noting that the examples of evidence provided are only a guide and not intended to be an exhaustive list.

If you need help completing this form, please contact TrainingPackageAssurance@dewr.gov.au.

Refer to the department's website and the TPA Community in GovTEAMS for further information about the Training Package Assurance process.

Section One: Submission Details

1. Jobs and Skills Council Details

Jobs and Skills Council Name:
HumanAbility

Contact person: (the person the Training Package Assurance team will liaise with during the assessment process, you can identify more than one person here if required)			
Name(s):	Cristina Ferrari	Position:	Director of Quality Assurance
Phone:	0493 891 586	Mobile:	Click here to enter text.
Email(s):	Cristina.ferrari@humanability.com.au		

2. Project Details

Project ID:	HMA_ANN_2425_002
Project Title:	HLT Health Services Assistance: Qualification Review

Provide a brief description of the project.

The *HLT33115 Certificate III in Health Services Assistance* is a key entry-level qualification mapped to the Nursing Support and Personal Care Worker role (ANZSCO 4233). Last reviewed in 2015, the qualification no longer fully aligns with contemporary sector demands, which have evolved significantly due to rapid technological advancements, heightened infection control measures, and a growing focus on patient-centred, culturally competent care.

Despite strong demand, the industry faces labour and skills shortages. Factors contributing to high turnover include relatively low wages in some roles, limited career progression pathways, and the physically and emotionally demanding nature of the work. This is compounded by changes in policy settings related to migration, gender pay disparities, and aged care reforms. Taken together, these pressures underscore the need for qualifications that can attract, train, and retain workers ready to meet current and future healthcare challenges.

The health care and social assistance sector employs over 2 million workers, making it Australia's largest employing industry. Employment in this sector has grown steadily over the past decade, with ongoing increases projected for roles under ANZSCO 4233 particularly in hospitals, aged care, disability support, and community-based services. The 2023

Intergenerational Report also highlights Australia's ageing population as a key driver of expanded care needs, further emphasising the importance of equipping the workforce with updated, flexible skills. In line with the growing demand for health services, vacancies for skilled Nursing Support and Personal Care Workers have grown significantly in recent years. Training efforts have seen limited success, with most students not completing the qualification. This project aimed to build a more effective training pathway with flexible products to support occupational flows and provide satisfying careers for graduates in this important and growing sector.

Project scope

The project initially focused on reviewing the *HLT33115 Certificate III in Health Services Assistance* and its 25 associated units of competency. The scope was later broadened to include the *HLT47515 Certificate IV in Operating Theatre Technical Support* and a new unit focused on maternity support.

During the 'Initial Development' phase through the functional analysis process, it was identified that *HLT33115 Certificate III in Health Services Assistance* provides a pathway into *HLT47515 Certificate IV in Operating Theatre Technical Support*. An early review of the *HLT47515 Certificate IV in Operating Theatre Technical Support* revealed substantial duplication with *HLT33515 Certificate III in Health Service Assistance*, with many of its units of competency already included with the Certificate III level qualification, resulting in significant overlap between the 2 qualifications. Enrolment data also indicated relatively low uptake of the Certificate IV, with no enrolments recorded in some jurisdictions.

In response, a proposal to expand the scope of the project was submitted to and approved by DEWR, to expand the scope of the project to include *HLT47515 Certificate IV in Operating Theatre Technical Support*. This expansion created an opportunity to determine the ongoing need for the Certificate IV level qualification and to consider potential structural changes to the qualification to ensure closer alignment to AQF level IV requirements.

Out of the 25 units under reviewed, 6 units listed in the qualification were replaced with endorsed equivalent units. As part of the functional analysis a detailed component-by-component analysis confirmed that the updated versions delivered outcomes consistent with the original intent. As a result, no redevelopment was required, and the endorsed replacement units were adopted directly into the qualification.

There were 14 'cross-sector' units, including 9 HLT food safety and handling units that appear in multiple qualifications. Due to the limitation in scope of this project, it was determined it would be more appropriate to review these units as part of a future cross-sector project.

3. Scope of the submission

Provide the total number of Qualifications, Units of Competency, and Skills Sets included in the proposed release of the Training Package. This may include any minor changes that will be made in the proposed release.

While the assurance assessment focuses on products that require endorsement by Skills Ministers (i.e. major changes), understanding the context for the entire release may be helpful to the Assurance Body.

Refer to the Categories of Change tables in the TPOF for the definition of major and minor changes.

	Major	Minor	Total
Qualification(s):	2	0	2
Unit(s) of competency:	8	0	8
Skill Set(s):			0

If applicable, provide an overview of minor change updates that will be included in this release.

N/A. The units in this submission do not appear in any other qualifications other than the ones being submitted for endorsement.

 Complete and upload *Attachment A – Products submitted for assurance*

4. The Annual Training Product Development Plan

Provide a link to the published plan on your website.

Link/URL:	Copy and paste the link/URL here.
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If the activity is not listed in the plan, provide an overview of the unforeseen or urgent need addressed by the activity.

As confirmed during the functional analysis and the public and government consultation process, the qualification purpose for *HLT33126 Certificate III in Health Services Assistance* and *HLT47526 Certificate IV in Operating Theatre Technical Support* remained unchanged. The qualification descriptions were refined to provide greater clarity of their purpose. These improvements ensure that the purpose of each qualification is clearly articulated to students, employers, and RTOs, directly supporting the TPOF.

4.1 Where the submission contains major changes to a qualification/s, has the Purpose of any of the products changed from what is recorded in the Annual Training Product Development Plan (ATPDP)? Answer 'Yes' where the Purpose of the products is not included in the ATPDP.

Yes No (go to Q5)

If yes, provide details of the changes OR where the purpose of the qualification/s contained in the project is not included in the ATPDP, please provide below.

Click here to enter text.

Section 2 - Submission Evidence

Technical Committee

5. Technical Committee Composition



Upload details of the membership of the technical committee and their expertise as per Step 1.2 of the TPOF Process Requirements including the Terms of Reference for the committee

Has the composition of the technical committee changed from that published at the pre-submission stage?

Yes No (go to Q6)

If yes, provide a reason for the change describing any impact of the change on the development activity.

The Technical Committee (TC) has undergone the following membership changes:

- Australian Nursing & Midwifery Federation (ANMF): Jodie Davies stepped down from the TC effective 16 June 2025. To maintain the essential representation of nursing and midwifery industrial interests, Alice Kett (ANMF National Branch) was appointed as her replacement. This ensured the union's perspective remained integrated into the development process without a lapse in oversight.
- All Health Training (RTO): Marc Phee resigned from the TC effective 22 July 2025. Following a review of the committee's composition, it was determined that a direct replacement was not required. The TC retained a robust educational perspective through the participation of 3 other registered training organisations (RTOs) and 4 educational experts.
Rationale for sufficiency - The current membership continued to meet the requirements of the 2025 TPOF by maintaining a balanced cross-section of industry, regulatory, and provider expertise.

6. Technical Committee Statement

Provide a statement that the technical committee has reviewed the final draft training package products. Include information about the process for the technical committee review (for example, was the review completed during a meeting or out of session).

The last technical committee meeting was held on 9th April 2026. Final training products drafts were provided one week prior to the meeting, to enable members to review.

After feedback received from the Assurance Body on the maternity unit, an additional technical committee meeting was held to review the revised unit. The revised maternity unit, including the assurance body's feedback, was circulated again via email for final review by the technical committee one week prior to the meeting. 2 TC members were unable to attend the scheduled meeting and were briefed via email.

All technical committee members were subsequently provided with the Technical Committee Confirmation of Review form to formalise and confirm their review of the final version of the training products.

The ANMF has formally informed that while they support this project, they do not support the maternity support unit - HLTAIN05 Pregnancy and postnatal health and wellbeing foundations and its inclusion in the Certificate III in Health Services Assistance qualification.

Consultation Activity

7. Stakeholder Consultation Strategy



Upload a copy of the stakeholder consultation strategy

Did the consultation undertaken deviate from the stakeholder consultation strategy (including changes to identified stakeholders, and any delays or changes to consultation timeframes)?

Refer to pg 24-26 of TPA Submission Compliance Guide.

Yes

No (go to Q8)

If yes, provide a summary of what changed and why.

The project was executed in a manner that largely adhered to the geographic and sectoral goals of the consultation strategy. Public and government consultation kept in line with the consultation strategy by a couple of days, in which additional time was allowed.

The original strategy planned for 12 consultation workshops. In execution, 10 formal workshops were conducted, which included a planned workshop in Broken Hill that was converted into a site visit. This allowed for deeper engagement with the region, when it became clear that a traditional workshop format was not the most effective way to capture local insights. Bairnsdale and Busselton were initially planned as workshops, however due to limited number of registrations, these workshops were turned into online sessions. There was a total of 5 online workshops planned, this was increased to 7, due to the 2 face to face session cancellations.

While the consultation strategy initially proposed consultation through the consultation portal, delays in the portal's implementation have impacted the project's consultation methodology. Stakeholders accessed draft training products and provided feedback via a structured survey accessed directly via the HumanAbility website. This change ensured that

the online feedback process was integrated into the existing user experience, though it required additional time to manage the consultation log, including providing manual individual responses and a rationale for individual items.

8. Consultation Timeframes

Provide an overview of when the consultation activities were undertaken.

You can enter more than one set of dates for each consultation phase as required.

Consultation Phase	Dates
Public and government consultation	18 March to 14 May 2025
Incorporating feedback (additional consultation if required)	<p>19 May 2025 to 4 March 2026.</p> <p>On 10 November 2025, the updated draft training products were published on the HumanAbility website for a 3-week public validation period, closing on 28 November 2025. The validation release included:</p> <ul style="list-style-type: none"> • draft qualifications and associated units of competency • draft Companion Volume Implementation Guide (CVIG) • summary of proposed changes • consultation log. <p>All stakeholders signed up for project updates were formally notified of the validation period via email and social media. Stakeholders were invited to provide feedback via an online survey published alongside the draft materials on the HumanAbility’s website. In addition to survey submissions, written feedback was also received directly via email. All feedback received during the validation period was recorded in the consultation log under the “validation” tab to ensure transparency, traceability and response.</p>

Consultation Phase	Dates
Senior Officials Check	<p>5 March 2026 to 21 April 2026.</p> <p>The Senior Responsible Officer (SRO) review commenced on 5 March 2026. Following jurisdictional concern regarding the ASK template design for HLTAIN005 Pregnancy and postnatal health and wellbeing foundations, and the Assurance Body technical review, updated training products were re-submitted to the SROs on 8 April 2026. The SRO review period was extended by a further 2 weeks to conclude on 21 April 2026. WA requested for an extension and this was provided until the 22 April 2026. Commonwealth has also requested for an extension until the 29 April.</p>

9. Vulnerable and Minority Cohorts

Describe how consultation activities have been responsive to the needs of vulnerable or minority cohorts, including women, people with disability, culturally and linguistically diverse communities, and First Nations people.

Information should include how vulnerable or minority stakeholders were identified and how consultation activities were tailored to respond to the needs of those stakeholders.

Refer to pg 26 of the TPA Submission Compliance Guide.

The consultation activities were designed to meet 2025 TPOF requirements and align with HumanAbility’s value of being inclusive and designed to value diversity. Public consultation was held in every state and territory, covering metropolitan (all capital cities) and regional/remote areas, including Cairns and Broken Hill. To ensure meaningful participation, the project utilised:

- Diverse methods: Face-to-face and online workshops, site visits, surveys, and interviews.
- Flexible scheduling: Sessions were held at various times to accommodate frontline workers, employers, and unions.
- Inclusion of priority cohorts: Special attention was provided to ensure training products were culturally safe and accessible, with specific focus given to women, people with disability, CALD communities, and Aboriginal and Torres Strait Islander people. See anti-discrimination assessment for further information on how these were incorporated into the training products.

10. Consultation Log



Upload the consultation log including the high-level summary
(an example consultation log is provided in GovTEAMS)

Include information about all consultation activities undertaken, how feedback has been logged, and how feedback has been addressed. For example, if a workshop was conducted and no individual feedback was gathered, describe how the results of the workshop were considered in the activity.

Provide as much detail as possible to support the Assurance Assessor’s understanding of the consultation process including the treatment of feedback. This detail may be provided in the high-level summary or below.

Refer to pg 27-32 of the TPA Submission Compliance Guide.

Consultation Activities Undertaken

HumanAbility engaged 167 stakeholders through a mix of metropolitan, regional, and remote consultation activities. Formal workshops were conducted in every state and territory, including capital cities and regional hubs such as Cairns and Broken Hill. When face-to-face registrations were low, such as in Bairnsdale and Busselton, these sessions were converted to online workshops to maintain engagement. Throughout the consultation period, a stakeholder engagement survey was hosted on the HumanAbility website, receiving 30 responses. All engagement activities were recorded in the engagement activities tab.

Subject Matter Expert (SME) Panels

Due to limited initial feedback regarding the operating theatre technician (OTT) stream and conflicting views on maternity support units, 2 specialist SME panels were established. The OTT panel met several times to refine OTT technical units. The maternity SME panel, comprising representatives from the ANMF, CATSINaM, and various state health departments, met several times.

These panels provided the technical depth required to resolve complex design issues before final materials were presented to the technical committee for review and alignment. These meetings, including agreed actions, were recorded in the SME meetings tab. SME representatives were also logged in the SME members tab for transparency.

Feedback Logging and Resolution

All feedback received via workshops, surveys, site visits, and email were recorded in the consultation log. The consultation log served as the primary tool for transparency and governance. Feedback received during the consultation period was logged in the “All

feedback and responses' tab, whilst a separate tab was created for the validation phase. Each entry was carefully analysed based on the volume of support, the feasibility of implementation, and alignment with project outcomes.

For more detailed information, refer to Attachment – Consultation Summary Report.

11. Senior Officials Check



Upload evidence that the Senior Responsible Officer (SRO) check was undertaken

Engagement with SROs must be recorded in the Consultation Log.

Use this space to record any additional information about the SRO check to support the Assurance Assessor's understanding of the submission.

The Senior Responsible Officer (SRO) review process commenced on 5 March 2026. Following technical feedback from the Assurance Body and jurisdictional concerns regarding the ASK template design for HLTAIN005 Pregnancy and postnatal health and wellbeing foundations, updated training products were re-submitted on 8 April 2026. To accommodate this, the SRO review period was extended by a further two weeks to conclude on 21 April 2026. Further extensions were granted to WA until the 22 April 2026 and the Commonwealth until the 29 April.

While all responding SROs provided support for the project, the WA SRO has formally indicated they do not support the above maternity unit.

12. Support from Regulatory and Licensing Bodies

Do any of the products in the submission have regulatory, licensing, or legislative implications?

Yes No (go to Q13)



Identify products that contain regulatory, licensing or legislative implications in *Attachment A – Products submitted for assurance*



Upload evidence of support from all relevant national/state and territory regulatory and/or licensing bodies

Note: Where products contain regulatory, licensing or legislative implications there is mandatory information that must be included in the Companion Volume Implementation Guide.

13. Engagement with other Jobs and Skills Councils

Are any of the products in this submission imported into training package products managed by other Jobs and Skills Councils?

Yes No (go to Q14)

If yes, list the Jobs and Skills Council(s) impacted and describe how you have consulted with them. Briefly describe the impact on relevant qualifications.

Refer to pg 29 and 31 of the TPA Submission Compliance Guide.

The 8 units of competency in this project do not appear in any other training products other than the qualifications being sent for endorsement, therefore consultation with other JSCs was not required.



Upload evidence of engagement with all listed Jobs and Skills Councils

14. Rationale for mandatory workplace requirements

Are any Mandatory Workplace Requirements (MWRs) included in the submitted products?

Yes No (go to Q15)



Identify products that contain MWRs in *Attachment A – Products submitted for assurance*

If yes, describe the process undertaken to determine the inclusion of MWR. Consider the process set out in the good practice guide on MWR: [On the Mark: 5 Good Practice Principles](#) when completing this section.

The inclusion of mandatory workplace requirements (MWR) for units HLTAIN003 Assist with nursing care, HLTTHE005 Assist with preparation of healthcare recipient for operative procedures, and HLTTHE007 Manage advanced technology in surgical theatre environments is based on the high-risk nature of acute and surgical environments where simulation cannot replicate live clinical variables.

For the HLT33126 Certificate III in Health Services Assistance, these requirements apply only if specific elective units or one of the specialisations are selected. Group B: Operating Theatre Technician which includes HLTTHE005, and Group C: Assisting in Nursing includes HLTAIN003. In the HLT47526 Certificate IV in Operating Theatre Technical Support, HLTTHE007 is now a core unit, making the MWR of 80-hours mandatory for all learners completing this qualification.

The existing 80-hour requirement for *HLTAIN003 Assist with nursing care* was retained without amendment. Consultation with stakeholders and the Technical Committee confirmed that 80 hours is necessary to ensure the safe application of nursing care under delegation and supervision in an acute care setting.

The addition of 80-hours for HLTTHE005 and HLTTHE007 was validated by Subject Matter Expert (SME) panels and the technical committee as essential for safe practice. For HLTTHE005, the MWR provides supervised exposure to sterile field management and live surgical workflows. For HLTTHE007, the requirement addresses the complexity of advanced technologies, such as robotics and integrated systems, which require workplace immersion for safe calibration, troubleshooting, and understanding of theatre governance. Industry consensus indicates that simulation is insufficient to replicate team dynamics, infection control rigour, and communication under pressure required in these specialised environments.

14.1 Support for mandatory workplace requirements



Upload evidence of support for proposed requirements (including from small to medium sized enterprises), and employer willingness to support learner work placements

Use this space to record any additional information about how employer support for learner work placements was gained.

Note: support is required to be demonstrated for all training package products containing MWRs in the scope of the submission, regardless of whether they have been changed as a result of the development project. Confirmation of ongoing support for MWR including employer support for work placement needs to be gathered through the consultation process.

Refer to pg 29 - 32 of the TPA Submission Compliance Guide.

MWR was one of the questions included in our survey, during consultation and validation, to gather feedback and identify any potential implementation issues. It was also discussed in greater detail during the SME panels as well as the technical committee meetings. Key employers, that were part of these groups, have provided support for providing work placements to learners, as documented in the consultation log – SME Meetings and Technical Committee Meetings. The technical committee has also signed the Technical Committee Confirmation of Review form, confirming that they support MWR in the relevant training products above.

15. Implementation Issues

What intelligence did you gather from stakeholders about implementation of the training package products? How were any implementation issues raised through the consultation process addressed? Provide detail below to support the Assurance Assessor’s understanding of the submission.

Refer to pg 30-31 of the TPA Submission Compliance Guide.

There were 2 main issues identified during the public and government consultation period: There was not sufficient feedback received on the Certificate IV in Operating Theatre Technical Support and the 3 OTT units that are part of this review. There was a wide range of conflicting views on the development and inclusion of the maternity support units, and consensus could not be reached as part of consultation.

Examining the membership of the Health Service Assistance Technical Committee, it was identified that there was limited coverage of the above areas. To address these challenges, 2 specialist subject matter expert (SME) panels were established to provide targeted guidance: one focusing on operating theatre (OTT) practice and the other on maternity support.

Membership of the panels was identified through industry recommendations and industry contacts. These panels enabled in-depth, industry-informed input, ensuring the review captured the specific skills, knowledge, and workforce needs relevant to each specialisation. Victoria is heavily represented on the OTT SME panel due to the majority of delivery of the Certificate IV in Operating Theatre Technical Support occurring in this state. There were no formal terms of reference for the panels. The primary purpose of the panel was to provide specialist advice on specific units of competency and qualification. All advice and recommendations were documented and discussed with the technical committee for consideration and review. The panels met on multiple occasions as documented in the consultation log and also reviewed documents out of session, ensuring timely and ongoing input into qualification and unit development.



Include detail about implementation in the *Consultation Log* including information about the stakeholders involved

16. Disputes

Note: This section refers to disputes as described in the Model Dispute Resolution Policy outlined in the TPOF Process Requirements.

Were any disputes recorded during the development activity?

Yes No (go to Q18)

If yes, describe the dispute/s and how you applied your internal dispute resolution process to resolve the matter.

Click here to enter text.



Include detail about the dispute/s in the *Consultation Log* including information about the stakeholders involved (See example Attachment B Consultation Log - Dispute Resolution tab)

17. Alternative Dispute Resolution (ADR)

Was an Alternative Dispute Resolution (ADR) practitioner engaged?

Yes No (go to Q18)

If yes, provide a summary of any disputes that were escalated to ADR. Include the recommendations produced, the final position of the Jobs and Skills Council, and a justification where the ADR practitioner's recommendations were not adopted.

Click here to enter text.



Upload a copy of the ADR practitioner's advice

18. Evidence of broad consensus

Has broad consensus been reached on all products?

Yes (go to 18.1) No (go to 18.2)



Upload evidence of support (e.g. letters of support)

18.1 Provide a summary of how broad consensus has been determined.

Refer to pg 35-36 of the TPA Submission Compliance Guide.

HumanAbility ensured that consultation activities captured a diverse range of perspectives of stakeholders. All training products have been reviewed and updated following a thorough analysis of feedback received throughout the consultation period from a diverse range of stakeholders, including employers, training providers, peak bodies, subject matter experts, operating theatre technicians, registered nurses and midwives.

Following the initial consultation, a thorough analysis of all feedback was undertaken to identify areas of clear consensus. Where divergent views existed, HumanAbility worked with subject matter experts and the technical committee members, to assist with finalising key decision on training products.

Training products were then added to the website for a validation period of 3 weeks. Following the validation, feedback was discussed with the subject matter expert panels as well as the technical committee for decision on those final training products.

This process confirmed the suitability of the proposed changes and strengthened the overall quality, relevance and accuracy of the training products.

18.2 Where broad consensus is not reached, provide a justification for why the product has been submitted for endorsement, including how you attempted to gain consensus.

In accordance with the 2025 TPOF and our internal dispute resolution policy, HumanAbility undertook extensive efforts to achieve broad consensus on the maternity support unit - HLTAIN05 Pregnancy and postnatal health and wellbeing foundations. Despite these efforts, a significant disagreement remains between key stakeholders, specifically regarding the inclusion of this unit within the HLT Health Training Package and the Certificate III in Health Services Assistance qualification.

Throughout the development process, HumanAbility prioritised early resolution by initiating several rounds of meaningful engagement. Recognising the sensitivity around maternity support, we established a specialist subject matter expert (SME) panel and convened multiple one-on-one meetings with dissenting parties, including the Australian Nursing and Midwifery Federation (ANMF).

The primary goal was to genuinely consider stakeholder opinions while refining the unit's scope. To address concerns, we:

- transitioned the content into a single Application of Skills and Knowledge (ASK) template
- strengthened the language surrounding supervision, delegation, and role boundaries
- focused the unit purely on foundational support, removing any clinical intervention or assessment.

Despite these modifications and broader technical committee's support for the revised version, the submission has opposing concerns from 2 major stakeholders. The ANMF have confirmed they do not support the maternity unit and its including in the Certificate III in

Health Services Assistance qualification. The disagreement centres on the potential for unintended workforce impacts and concerns that the unit may still imply an overlap with regulated midwifery practice.

Conversely, while the WA SRO supports the Certificate IV in Operating Theatre Technical Support and the Certificate III in Health Services Assistance submissions, they oppose the final version of the maternity unit for the opposite reason. The WA SRO raised concerns regarding the absence of a maternity specialisation in the Certificate III supported by the original 2 draft maternity support units of competency that were shared during the public consultation period. The WA SRO suggests that removal of the original 2 draft units of competency potentially constrains the development of a sustainable workforce pipeline by limiting opportunities to expand alternative models of care involving maternity assistants as a strategy to address the critical shortage of midwives in WA.

While our dispute resolution policy has been followed through intensive consultation and technical refinement, consensus on this specific component remains irreconcilable at this stage. The impact of excluding the unit would be a missed opportunity to provide nationally consistent training for existing support roles; however, as a tripartite organisation, we recognise the weight of this industry and jurisdictional non-support and present this submission with the identified disagreement clearly transparent.

Compliance with Requirements

19. Anti-Discrimination Assessment

Provide an assessment that demonstrates that the products meet anti-discrimination legislation, and associated standards and regulations, including the [Disability Standards for Education 2005](#).

Refer to pg 38–40 of the TPA Submission Compliance Guide.



[Upload a copy of the Anti-Discrimination Assessment](#)

20. Pathways

Describe the process undertaken to ensure the training package products have pathways that facilitate movement between education sectors and employment.

Refer to pg 41–42 of the TPA Submission Compliance Guide.

Note: Pathways advice must be included in the Companion Volume Implementation Guide.

The pathways discussion is a fundamental component of the functional analysis process. This includes extensive initial research to confirm the purpose of the qualification, followed by researching job ads, and then targeted interviews with stakeholders, specifically employers, to determine how the training products are utilised and how they align with specific job roles and industry requirements. Detailed findings regarding these occupational flows are documented in the Functional Analysis Report.

For this project, the review of the qualifications were particularly focused on ensuring the qualification purpose was clear and removed duplication to ensure the occupational outcomes were better defined.

This evidence-led approach to pathway design aims to address historic attrition rates by providing students with transparent career trajectories that reflect the diverse realities of the healthcare sector.

21. Rationalising and Streamlining

Describe the process undertaken to rationalise and streamline the training package products.

Include information about any units and/or qualifications to be deleted and the results of any analysis of cross sector units and/or other existing units.

Refer to pg 43-44 of the TPA Submission Compliance Guide.

The redesign of these qualifications focused on creating a clearer pathway for learners by strengthening the differentiation between occupational outcomes in these 2 qualifications. For the Certificate III in Health Services Assistance, we have retained the existing specialisations for operating theatre technicians and assistants in nursing, and introduced a range of occupation titles in the qualification description to provide greater clarity on the qualification purpose and roles.

As part of the functional analysis, it was identified the need to add targeted electives designed to bridge identified gaps for ward assistants and ward clerks. By adding these units, the qualification now supports essential administrative coordination without compromising its core clinical focus, while a flexible WHS group allows learners to select the unit most relevant to their practical environment. The analysis also identified a gap which led to the creation of a specialised unit for maternity assistants. This new unit directly responds to jurisdictional variations and provides a clear framework for non-midwifery support tasks performed under midwife delegation.

To support career progression, we established a more direct pathway into senior roles by introducing formal entry requirements to the Certificate IV in Operating Theatre Technical Support. This transition involved a rigorous rationalisation process to remove unit duplication and a greater alignment of the qualification to the units of competency and skills and knowledge required at that senior level. A key part of this streamlining was identifying the most appropriate WHS, which focuses on conducting manual tasks safely, and managing personal stressors in the work environment, over more general safety units. By taking this approach we have ensured the core requirements remain focused on the high-risk nature of patient handling and clinical workflows.

21.1 Has the analysis identified any overlap with existing units?

Yes No (go to Q22)

21.2 Provide a justification for why existing products are not suitable.

An analysis of the SIT food handling and safety units has been undertaken to identify potential duplication with the HLT units. It is noted that the SIT units are currently under review by SaCSA. Where industry stakeholders deemed SIT units suitable for the health context, they have been utilised to promote cross-sectoral portability. In scenarios where hospital-specific risks, patient safety and clinical infection control requirements required a more specialised approach, the HLT units have been retained. This model ensures the qualifications reflect the diverse realities of the health services assistance workforce while maintaining safety standards.

22. Request to change transition period

Is a change to the standard transition period (12 months) proposed for any products in this submission?

Yes No (go to Q23)



Identify products where a change to the transition period is proposed in *Attachment A – Products submitted for assurance*

Provide a rationale for the proposed transition period. Include information about the consultation undertaken to identify the need for a changed transition period.

As both qualifications have been deemed 'not equivalent' to their superseding training products, stakeholders have informed a longer transition period would assist preparing to add the new qualifications to scope, as well as completing students enrolled under the current training package rules.

A number of Queensland providers deliver the Certificate III in Health Service Assistance as a VET in Secondary School program. To assist this delivery mode and to align to the school calendar year, as well as adding this qualification to scope, a longer transition period is required.

A formal request has also been received by Swinburne to extend the transition period to 18 months (December 2027) to assist delivery, noting that the expected endorsement date will be late June/early July 2026.

HumanAbility consulted ASQA, who advised that under the 2025 Standards for RTOs, students enrolled within the first 12 months may complete their study in a "timely manner," potentially removing the need for a formal extension for existing cohorts. However, stakeholders remain concerned about the administrative burden of adding non-equivalent products to scope within the 12 month period.

HumanAbility seeks Assurance Body (AB) guidance on this matter, noting that VRQA and WA TAC operate under separate regulatory frameworks. We have documented ASQA's full response in the Consultation Log and remain committed to a transition process that supports both providers and students.

Training Product Content

23. Training Package Products

The Training Package Assurance team will review qualifications, units of competency and Skill Sets through Training Product Central.

Note: The drafting status of each training product must be set to 'Ready for Submission' and the project status must be set to 'Assurance Body Consideration'.



[Upload a copy of the Companion Volume Implementation Guide](#)

24. Pre-requisites

Does the submission include any units of competency that contain pre-requisites?

Yes No (go to Q25)

If yes, describe the process undertaken to ensure the use of pre-requisites is minimised.

This project ensures the use of pre-requisites is minimised by explaining to SME panels and the technical committee the barriers created by introducing pre-requisites. The goal is to remove unnecessary obstacles to learner progression and ensure skills are transferable when possible. The newly created unit - HLTTHE008 Provide assistance during clinical emergencies in surgical theatre environments is the only unit that a pre-requisite was deemed as required. The unit HLTAID009 Provide cardiopulmonary resuscitation has been identified as a pre-requisite, this is due to safety requirements necessary prior to undertaking HLTTHE008.

Were there any issues raised about pre-requisites through the consultation process?

Yes No (go to Q25)

If yes, provide a summary of the issue/s raised and how the issue/s have been resolved.

Click here to enter text.

25. Foundation skills

How did you determine the required level of performance for each of the ACSF core skills areas?

Refer pp 51-52 of the TPA Submission Compliance Guide.

To determine the foundation skill requirements for the qualification, HA conducted a systematic analysis of all core units to identify both implicit and explicit skill demands. The process began by identifying each core unit and pinpointing where the 5 core skills (learning, reading, writing, oral communication, and numeracy) were embedded within the units. By marking up the units, HA could accurately map where these skills sit within the performance criteria and required knowledge.

Following this mapping, HA assessed each identified skill against the Australian Core Skills Framework (ACSF) performance features grid to determine the ACSF level. This ensured that the levels assigned were evidence-based and accurately reflected the complexity required to perform the tasks. Throughout this stage, HA exercised particular care to ensure the analysis reflected existing expectations without introducing new requirements or unnecessary barriers to learning.

The data for each individual core unit was then consolidated into a summary spreadsheet. By aggregating these findings, HA identified the highest ACSF level required for each of the 5 core skills across the entire core unit set of each qualification. These maximum levels were then used to develop the final spikey profile for the qualification, providing a clear and transparent representation of the foundation skill benchmarks necessary for successful completion and industry practice.

26. Stand-alone Units

Does the submission include any stand-alone units of competency?

Note: stand-alone units refer to units of competency that are not packaged into a qualification.

Yes No (go to Q27)

If yes, provide justification for the use of a stand-alone unit. Explain why it cannot be immediately packaged into a qualification and the proposed plan for embedding it in a qualification in future updates to the training package.

Refer p 52 of the TPA Submission Compliance Guide.

Click here to enter text.

26.1 Support for Stand-alone Unit/s




Upload evidence of industry need and support for each stand-alone unit

Section 3 – CEO Declaration

27. Submission declaration

- This submission and proposed training package products were developed in accordance with all components of the Training Package Organising Framework (TPOF).
- I confirm the training package product/s align with their intended purpose and are structured to meet the needs of industry, employers and learners.
- I confirm all required attachments are included with this submission.
- I confirm the final draft products are accurately entered into Training Product Central and are ready for assurance assessment.

Jobs and Skills Council Chief Executive Officer			
Signature*:		Date:	30/04/2026
Full Name:	Emma King		

* Options for capturing the CEO signature include: copy and paste an electronic signature above; upload a separate signed document which includes the required declarations to GovTEAMS; send an email from the CEOs email address to TrainingPackageAssurance@dewr.gov.au which includes the required declarations.

27. CEO summary statement


Include a summary from the CEO describing how they have ensured that the submission has been developed in accordance with the requirements set out in the TPOF.


I confirm that the submission for HLT Health Services Assistance Qualification review has been developed in strict adherence to the 2025 Training Package Organising Framework (TPOF). Our development process was anchored in an evidence-led functional analysis that identified critical gaps in the current qualifications and units of competency. Our teams have engaged deeply in public consultation across the country to discuss solutions to these training products that reached 167 stakeholders across metropolitan, regional, and remote locations. Recognising the complexity of the healthcare sector, we established specialised subject matter expert panels to resolve divergent views regarding the maternity support unit and operating theatre practice and worked with the technical committee to discuss and validate these complexities. This iterative approach, incorporating public workshops, site visits to regional centres like Broken Hill, and a formal 3-week validation period has resulted

in streamlined qualifications that remove duplication, establish clear career pathways, and provide flexible, high-quality training outcomes required by these sectors.

Submission Checklist

To avoid a delay in the processing of your submission, please ensure that your submission is complete. Submissions that are not accompanied by the required attachments will be returned for completion. Confirm the following documents have been uploaded where applicable.

Q.	Submission Requirement	Uploaded	N/A	 Evidence Reference
Other	Publish submission to JSC website. Step 5.1 of the TPOF requires JSCs to publish the submission on their website at the time of submission to the TPA.	<input type="checkbox"/>		Click here to enter the URL/link to the published submission.
3	Attachment A – Products submitted for assurance, including (where applicable): <ul style="list-style-type: none"> Regulatory, licensing, or legislative implications (see item 12) Mandatory Workplace Requirements (see item 14) Requested transition period details (see item 22) 	<input checked="" type="checkbox"/>		3. 25-002_HLT_Health_Services_Assistance_Attachment_A - Training_products_submitted_for_assurance
5	Technical committee membership details	<input checked="" type="checkbox"/>		5. 25-002_HLT_Health_Services_Assistance_Technical_Committee_TOR 5. 25-002_LST_HSA_Technical_Committee_Member_Bios
7	A copy of the stakeholder consultation strategy	<input checked="" type="checkbox"/>		7. 25-002_HLT_Health_Services_Assistance_Consultation_Strategy
10	The consultation log including: <ul style="list-style-type: none"> Detail about implementation (see item 15) Detail about disputes and the stakeholders involved where applicable (see item 16) 	<input checked="" type="checkbox"/>		10. 25-002_HLT_HealthServicesAssistanceConsultationLog
11	Evidence that the SRO check was undertaken	<input checked="" type="checkbox"/>		10. 25-002_HLT_HealthServicesAssistanceConsultationLog – Engagement activities tab 11. 25-002_LOS_SRO_Support_Emails_for_AB_Submission

Q.	Submission Requirement	Uploaded	N/A	 Evidence Reference
12	Evidence of support from all relevant national/state and territory regulatory and/or licensing bodies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Click here to enter the evidence reference/s, e.g. the relevant document title.
13	Evidence of engagement with other relevant JSCs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Click here to enter the evidence reference/s, e.g. the relevant document title.
14.1	Evidence of support for proposed MWRs including employer willingness to support placements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. 25-002_HLT_HealthServicesAssistanceConsultationLog 14. 25-002_LOS_Technical_Committee_Training_Product_Review_Confirmation_Forms_Combined 14. Letter_NSW_Health_HSA_qualification_review
16	Dispute details - describe the how you applied your internal dispute resolution process to resolve any disputes.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Click here to enter the evidence reference/s, e.g. the relevant document title.
17	The Alternative Dispute Resolution practitioner's advice	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Click here to enter the evidence reference/s, e.g. the relevant document title.
18	Evidence to support broad consensus	<input checked="" type="checkbox"/>		10. 25-002_HLT_HealthServicesAssistanceConsultationLog 18. 25_002_HA_Health_Services_Assistance_Consultation_Summary_Report
19	The Anti-Discrimination Assessment	<input checked="" type="checkbox"/>		19. HMA_ANN_2425_002_Project_Anti-discrimination Assessment
23	The Companion Volume Implementation Guide	<input checked="" type="checkbox"/>		HLT_Health_Companion_Volume_Implementation_Guide_Release_11.0
26.1	Evidence of identified industry need and support for a stand-alone unit	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Click here to enter the evidence reference/s, e.g. the relevant document title.