

Examination of the role and training of Environmental Health Paraprofessionals

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Brian P Wall
Health Policy Consultant

PO Box 3186
West Hobart
Tasmania 7000

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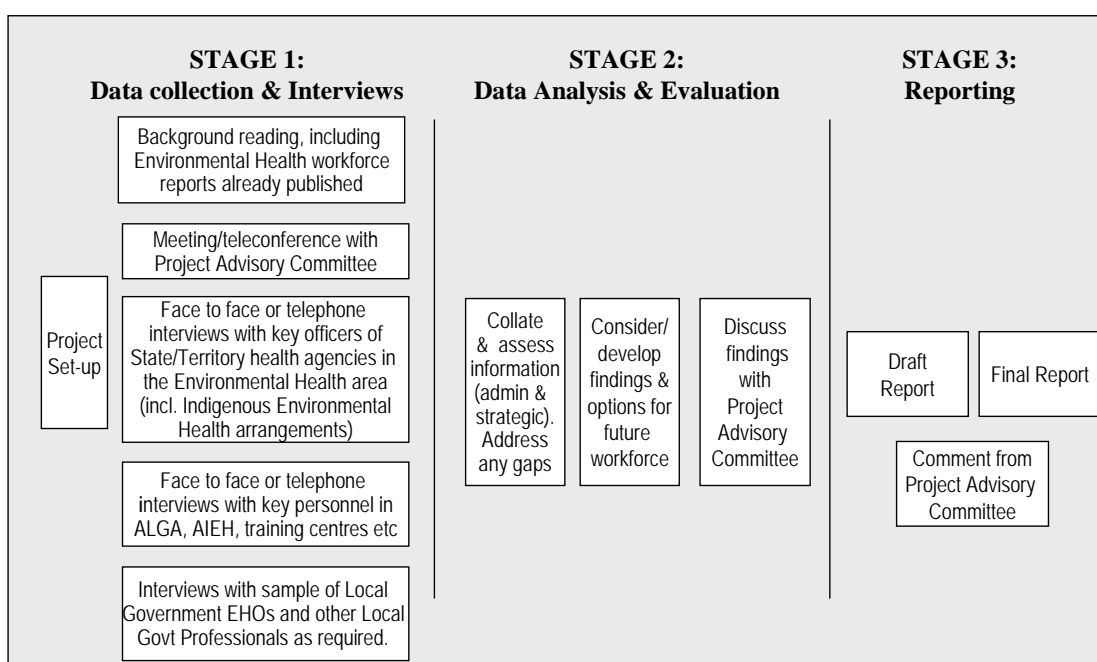
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Summary

The Environmental Health Committee (enHealth) has identified the environmental health workforce as a priority issue for health agencies and local governments across Australia. As one of the possible strategies to address the environmental health workforce requirements, enHealth commissioned this project to examine the use of environmental health paraprofessionals (technicians) to supplement the work of Environmental Health Officers (EHOs) in local government and, potentially, in other areas.

This report is principally concerned with the workforce gaps in the context of local government. Remedying that may address gaps in the environmental health workforce in other areas of government and industry as well as local government.

The methodology followed for this project is set out below.



Findings

Environmental health workforce studies undertaken by four States were reviewed. It is significant that while all found substantial workforce gaps, none specifically recommended EHPPs as a means to address them. Overseas models, while interesting, do not offer solutions that are clearly of value in the Australian context.

Interviews found technical support staff to be in fairly common use of in environmental health activities. Sometimes the interviewees did not identify these persons as 'paraprofessionals'. The majority of persons interviewed supported further use of EHPPs, provided the centrality of the EHO as supervisor was retained. Others saw it as the 'thin end of the wedge' and opposed it. The moves to deregulation, outsourcing and the increasing tendency to separate the regulation of food from other areas of environmental health are all leading to uncertainty amongst practitioners, and some see EHPPs as a further threat. The rate of change, however, appears to be driven by the inability of local governments to recruit EHOs in sufficient numbers for a range of reasons.

It is critical that the development of EHPPs does not decrease environmental health capacity still further by replacement of EHOs with a less skilled workforce. On the other hand, it is also critical to enhance the capacity to deal with day-to-day environmental health issues, which the training and employment of EHPPs offers.

The roles of technicians in other occupations are outlined and they provide models across a range of activities that support the view that the professionals' activities, capacity and efficiency are enhanced by the use of technical support. The training models support the entry level for the EHPPs at around certificate III or IV.

The Indigenous environmental health experience demonstrates the feasibility of EHPPs in certain settings, and the case to broaden it out to environmental health more generally seems compelling given the grave workforce issues that the sector faces.

One possible framework that has been developed for local government to assist it in addressing workforce needs is the Local Government Training Package (LGTP) LGA04, originally developed by ANTA but now managed by Government Skills Australia. Under the specialist qualifications training stream there are Certificate III, Certificate IV and a Diploma-level qualifications, which have been fully developed and approved by State Governments for training subsidies. This provides the opportunity for an immediate start to EHPP training, without need to design courses and units and have them approved. While this has extensive environmental health components to it, there has been little take-up of the training.

More recently a population health training package has been published by the Community Services and Health Industry Skills Council, in collaboration with the population health sector. This describes the content for three levels of training – Certificates II, III and IV. Each consists of a core of compulsory generic/organisational as well as technical units of competence, and a range of non-compulsory technically or community-oriented units. The courses offered that are of particular relevance in the context of this report are the Certificate III, IV and Diploma of Indigenous Environmental Health. No general environmental health courses have been developed as yet.

While these two training packages have different markets – local government in one case and the health sector in the other, and different Industry Skills Councils managing them, it is important that they meld. It would be a waste of resources and confusing if further units developed for EHPP training developed under the population health framework did not parallel the units set out in the LGTP where the training objectives are similar. It is heartening to note the units that have already been adopted one by the other. While the LGTP has its critics, it is at least a good place to start. In the longer run it is imperative that the two frameworks are drawn together.

Many of the persons consulted emphasised the necessity for EHPPs to have a training pathway that allowed them to progress through to become fully trained EHOs. Typically the pathway is from Certificate to Diploma to Degree. This is the same hierarchy that is provided in the Population Health Framework and is also inherent in the LGTP.

Managing risk

There are four key elements that need to be addressed in the introduction of EHPPs to the environmental health workforce arrangements in local or State/Territory government. EHPPs must work in a framework that ensures they:

1. are trained and competent in the area to which they are assigned.
2. are appropriately authorised under the relevant legislation, in line with their demonstrated competencies.
3. work under the supervision or direction of an EHO; and
4. activities undertaken have been risk-assessed as appropriate for the EHPP to undertake.

Part of the risk management under 4) is the performance of most technical tasks by EHPPs in accordance with written standard operating procedures (SOPs) or other protocols. These ensure the task is performed consistently and within certain boundaries.

List of Recommendations

1. That State and local governments work together to commence training of environmental health paraprofessionals with the intention that most trainees will be employed in local government, under the supervision of Environmental Health Officers, performing tasks appropriate to their training and competence at the time. 17
2. That Certificate III be the minimum entry point for non-Indigenous environmental health paraprofessional training and there also be offered an immediate opportunity to undertake Certificate IV training..... 17
3. Over time, Diploma level training also be provided, particularly if this is required to provide the stepping stone to full qualification as an Environmental Health Officer. 17
4. The Local Government Training Package be used as the initial basis to formulate the Certificate III and IV courses under either the local government or population health frameworks. 17
5. In promoting the development of the population health framework in this area, the Environmental Health Committee strive to ensure that the development and revision of the population health and local government training packages for environmental health paraprofessionals are coordinated and accepted by all stakeholders for the purpose of that training..... 17
6. The officers trained or training in this way should be known as Environmental Health Technicians (or trainee technician if appropriate). 17
7. That all Environmental Health Paraprofessionals work in a setting that ensures they:
 - are trained and competent in the area to which they are assigned
 - are appropriately authorised under the relevant legislation, in line with their demonstrated competencies.
 - work under the supervision of an Environmental Health Officer; and
 - are assigned activities that have been risk-assessed as appropriate for them to undertake.
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Abbreviations

Acronym	Full title
AIBS	Australian Institute of Building Surveyors
AIEH	Australian Institute of Environmental Health
ANTA	Australian National Training Authority
CSHISC	Community Services and Health Industry Skills Council
CIEH	Chartered Institute of Environmental Health
DEST	Department of Education Science and Training
EHO	Environmental Health Officer
EHP	Environmental health practitioner
EHPP	Environmental health paraprofessional
IEHW	Indigenous environmental health worker
LGTP	Local Government Training Package
PIA	Planning Institute of Australia

1 Introduction

enHealth has identified the environmental health workforce as a priority issue for health agencies and local governments across Australia. As one of the possible strategies to address the environmental health workforce requirements, enHealth has commissioned this project to examine the use of environmental health paraprofessionals (technicians) to supplement the work of Environmental Health Officers (EHOs) in local government and, potentially, in other areas. This report looks only at this one issue, although it is recognised that it needs to be part of a broader strategy if the environmental health workforce issues are to be addressed successfully.

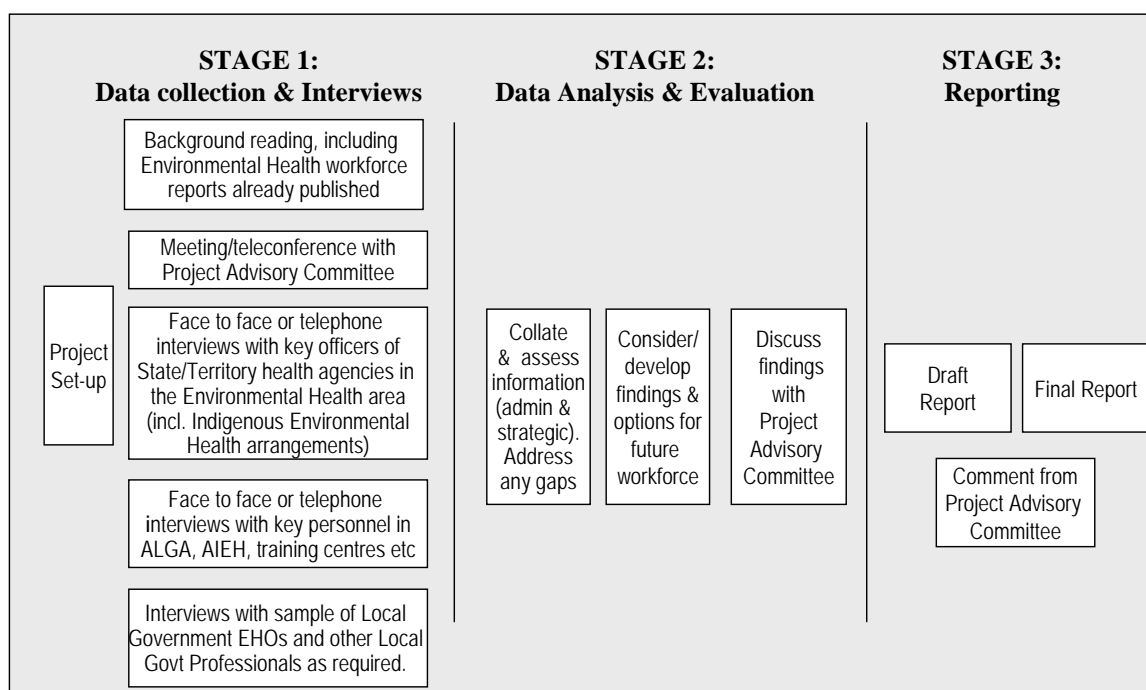
The only systematic EHPP training is in Indigenous environmental health. This report considers this and other frameworks but is principally concerned with the environmental health workforce gaps in the context of local government. Remedying that may address gaps in the environmental health workforce, in industry and other areas of government as well as local government.

The Terms of Reference for the study are provided in Appendix 1. They were endorsed by enHealth at its meeting in September 2006, and the project commenced at around that time. Brian Wall has been selected as the consultant to undertake the project, and this is the report of his findings. His background includes five years as Director Environmental Health in the (then) Health Department of Western Australia, as well as other senior public health roles. Since he commenced consulting in 1996, a number of the projects he has undertaken have centred on environmental health issues and requirements.

1.1 Methodology

The methodology followed for this project is set out below. The list of persons consulted is provided in Appendix 2.

Figure 1 Outline of the methodology to be followed for the environmental health technicians' feasibility project



2 Findings

2.1 Reports identified as being of relevance to this project

There are a number of reports in Australian environmental health workforce assessment and development that highlight the environmental health workforce shortages and they provide recommendations to address the problem. These will be briefly discussed insofar as they relate to EHPPs.

2.1.1 The “Morton Report” – Queensland, 2004

In 2004 Queensland Health published a report entitled “Public Health Workforce in Local Government”¹. This report identified the non-urban environmental health workforce shortage as of particular concern and made various recommendations to address it. The report did not propose training and employment of EHPPs.

2.1.2 South Australian EHO Workforce Review, 2004

The South Australian EHO Workforce Review² examined difficulties in recruiting and retaining EHOs, as well as examining the range of qualifications available to EHOs.

It also found a shortage of EHOs in future years, especially in non-urban areas. It examined strategies to address the shortage but, again, training and employment of EHPPs was not one of the recommended approaches.

2.1.3 Victorian EHO Workforce Review, 2005

This report³, commissioned by the Food Unit of the Victorian Department of Human Services, examined in detail the workforce issues. In relation to paraprofessionals (technicians in the report) it says (p.49):

Technician pathway - Consider the option of developing a structured pathway for a technician who would address aspects of the EHO role under supervision. Such an option would partly address the workload issues associated with annual food inspections. This option is currently in place in a number of councils but there is no minimum qualification specified. Such a role has been proposed by the AIEH although details of how the role would be structured are at an early stage of development.

Further work is required to explore whether councils would be likely to engage technicians with limited authority, to ensure that this option was not used to undermine the qualified EHO skill base and to determine appropriate minimum qualifications to support such a role.

No recommendation to proceed down this path is made in the Victorian report. There is a recommendation (11) to undertake further work in job design which, in an explanatory section to the recommendation, discusses structured job pathways from technicians to fully qualified EHOs. in a later chapter on training pathways (p. 82, it states:

The project received comment on the possibility of creating a technician role to undertake low risk aspects of the EHO function under direction. The creation of such a role could alleviate some of the workload pressures on EHOs and allow fully qualified EHOs to focus attention on more complex risk management activities. Current practice includes use of AOs who are not qualified as EHOs. The proposed AIEH certification scheme also provides for recognition of a technician role although related qualifications have not yet been specified. This option is discussed further... [elsewhere in the paper].

The impact of this issue on mapping of skills and knowledge as whether to identify levels applying to a technician role and to administering the Victorian Food Act. Exploratory discussions suggested that a technician responsible for food inspections would need to undertake sufficient food science training to support them to confirm a food safety risk level and to understand the specific risks associated with low risk food handling activities. However it was resolved that the project would only develop a detailed description of administering the Victorian Food Act. This decision reflects the mixed level of support for the proposal to create a technician role. Pending agreement on the value and functions of a technician role, skills and knowledge requirements then need to be identified and mapped.

2.1.4 Tasmanian Environmental Health Workforce Survey

An unpublished workforce survey was completed in Tasmania in 2005⁴. Like the other reports it found a shortage of EHOs, particularly in the non-urban setting. Current unmet demand is not likely to be filled by available graduates in Tasmania or from elsewhere, particularly as many of the EHOs retire. It does not specifically recommend training and employment of EHPPs but such a recommendation would have been outside the purposes for which the report was prepared.

2.2 Overseas situation

2.2.1 The environmental health workforce in the UK

The Local Government Pay and Workforce Strategy⁵ identified environmental health officers as one of the top ten workforce shortage areas for local government. In 2004, 67% of councils reported problems in this area. To address this, there have been strategies such as bursary payments, training placement funding for both Bachelor level and Masters level environmental health courses, careers websites and in London, recruitment of food enforcement officers as an entry point to the environmental health profession, with mapping of a further career development pathway. New courses have been developed at diploma level for environmental health technicians. These feed into an accredited associate route to full EHP (EHO) status⁶.

It should be noted that the UK has similar (perhaps slightly higher) academic requirements for EHOs (EHPs in the UK) but technician positions exist in the UK and anyone with an interest in environmental health is eligible to become a member of the Chartered Institute of Environmental Health (CIEH).

2.2.2 The environmental health workforce in New Zealand

New Zealand has an environmental health workforce employed at two levels – health protection officers who work in District Health Boards, and Environmental Health Officers who work at local government level. The former have a range of professional qualifications depending upon their precise role, whereas in local government they are EHOs. There has been a shift by local government to employ non-EHOs to undertake all but the statutory work that has traditionally been done by the EHOs, as the workforce shortages have become more acute. The public health legislation authorises EHOs specifically in relation to a small number of statutory roles (eg registered premises such as caravan parks) but it authorises council officers generally in other roles.

Local government EHOs still undertake work in food hygiene although the domestic food law is under review and the outcomes are unknown at this time. Food is regulated by a separate Food Safety Authority, which is separate from the Ministry of Health.

Thus New Zealand has a system in which technicians can be employed and are authorised under general powers in the public health legislation. There are presently no formal arrangements for training or recognition of a second tier of environmental health practitioner at the local government level.

2.2.3 The environmental health workforce in other countries

While there is information on the arrangements in other similar countries such as the US and Canada, the parallels are not close and their situation has not been assessed further.

2.3 *Points from consultations on the case for EHPPs*

2.3.1 Existing use of EHPPs in Australia

Persons interviewed sometimes indicated that they did not utilise EHPPs at present, but then went on to say, for example, how some complaints about certain frequently encountered issues that required low-level intervention were handled by specifically trained personnel, or mosquito control was undertaken by a person with pest control qualifications who worked solely in that area, and so on. It is clear that there are many jobs being fulfilled by ‘paraprofessionals’ now, although not by that name and they are not always viewed as being paraprofessionals. Others clearly recognised that paraprofessionals are currently an important part of the overall environmental health effort in undertaking these more routine roles.

This emphasises the difficulty of defining the limits of environmental health and activities that may be undertaken by the range of staff involved. This report will not attempt a definition, but it is clear that current and likely future practice is based on a model in which EHPPs may have many roles but only rarely have a range of competencies that allow a wide range of environmental health functions to be undertaken by the one officer. The more likely model identified during consultations is a person who undertakes a narrow range of functions for which they have specific training. This training may be through a course labelled environmental health, or it may be specialist training, such as pest control, noise measurement or complaints management and mediation.

The concern that the current workforce crisis has generated is that environmental health work will not be undertaken at all, or is or will be undertaken by inappropriately trained individuals. Even those who did not support EHPPs generally recognised the use of EHPPs as a better alternative than these other outcomes.

2.3.2 Views of those who did not support the training and use of EHPPs

A few of the persons interviewed did not support the use of EHPPs, believing that more could be done to recruit suitable trainees into undergraduate and postgraduate courses, or by recruiting already trained personnel from overseas. They saw this as 'the thin end of the wedge' and downgrading the role of EHOs. These people generally did not accept the view that use of EHPPs would free up EHOs to focus on higher risk and more strategic activities. Those who held these views came from across the whole spectrum of people interviewed, but were the minority.

Often the views expressed as to the (lack of) need for EHPPs to support overstretched EHOs were a matter of belief rather than a determination made on facts alone. Commendable efforts to achieve better recruitment into environmental health courses have been made by the AIEH, academics and others for a long time, but in most jurisdictions recruitment has steadily fallen, particularly recently. Additional dedicated sources are needed if any impact is to be made. Some additional resources are being applied to EHO enrolments, eg. in Queensland, but this needs to be a nation-wide effort. Even then, it is not assured (or even likely) that the EHO enrolments would increase sufficiently for future demand to be met. Further discussion on the findings from the consultations is found in section 3.1.

2.4 Summary on workforce initiatives

It is clear that all Australian jurisdictions and some other countries are experiencing considerable pressure in relation to the environmental health workforce at the local government level. The reasons for falling interest in environmental health as a career are unclear but the trend is long standing and appears to be getting more severe. It will only exacerbate the crisis in EHO availability, particularly in non-urban areas.

In Australia the moves to deregulation, outsourcing and the increasing tendency to separate the regulation of food from other areas of environmental health are all leading to uncertainty amongst practitioners, and some see EHPPs as a further threat. The rate of change, however, is driven by the inability of local governments to recruit EHOs in sufficient numbers (or at all) for reasons that have been described in some of the other workforce reports. Something different must also be tried.

A key risk in these changes is the loss of environmental health capacity which, in an emergency could lead to serious consequences. It is critical that the development of EHPPs does not decrease environmental health capacity still further by replacement of EHOs with a less skilled workforce. On the other hand, it is also critical to enhance the capacity to deal with day-to-day environmental health issues, which the training and appointment of EHPPs offers.

2.5 The use of technicians in other professions

Technical support staff are used almost universally to support the professionals in other areas of health. The example of pharmacy technicians is given below.

In addition there are similar workforce issues in other areas of local government and in some cases, planning and building surveying in particular, there has been change to try and improve the workforce shortage. The educational requirements that now apply in each of these professions are outlined below. Local government engineers are also in short supply. Brief communication with the Australian Local Government Managers' Association indicated that the engineers have not yet formally addressed the issue of use of technical support staff, although there is said to be instances where there are engineering technical assistants employed now.

2.5.1 Hospital pharmacy technicians

In hospital pharmacy the use of pharmacy technicians is routine. They support the pharmacists in the provision of safe and efficient hospital pharmacy services. Technicians provide a level of support that is in addition to pharmacy assistants and/or storepersons who generally have no specific qualifications other than school graduation and on-the-job training. In some States there are two levels of technicians employed, depending upon responsibility and/or the certificate level achieved (eg Certificate III or Certificate IV for senior technicians). Progress may depend upon a position being available at the more highly paid senior technician level as well as the necessary qualification. The Health Training Package⁷ includes a Certificate IV training framework for Pharmacy Technicians.

Extracts from one hospital's job description for Pharmacy Technicians and Senior Technicians are provided in Box 1. These provide a picture of the duties and responsibilities for each of the levels.

Box 1 Extracts of job descriptions for technical support staff in a hospital pharmacy

Pharmacy technicians

1. Working under the supervision of a pharmacist and following set procedures, dispense medications as prescribed for patients of the hospital and other centres as required and supply medications for inpatients as ordered on medication charts.
2. Coordinate the ordering, preparation and supply of sterile pharmaceutical products including intravenous nutrition and cytotoxics.
3. Prepare aseptic and other pharmaceutical products, as single items or batches as required, in accordance with approved procedures and under the supervision of a pharmacist.
4. Work with pharmacists on the wards by assisting in the management of Patients' Own Medications, preparation of Pharmacy Care Plans, providing Consumer Medication Information sheets, preparing patient counselling documents and discharge planning.
5. Assist in the management of the imprest system by regular liaison with clinical pharmacists and nursing staff in charge of wards and units to ensure that the levels are appropriate to the needs of the area.
6. Maintain knowledge of the specialised pharmacy software and ensure all pharmacy transactions are accurately recorded.
7. Other duties as directed by the Manager of the Pharmacy Department.

Source: Tasmanian Department of Health and Human Services. Reproduced with permission.

Senior Pharmacy Technicians

Coordinate and supervise other technicians taking particular responsibility for the workflow, prioritisation of urgent work and occupational health and safety issues.

Work with the supervisory pharmacist on the continual development and refinement of operating procedures for the area.

Train new staff in the operating procedures for the area, assist in the monitoring of current practice and provide ongoing support for technicians working in the area.

Undertake pharmacy technician tasks, including dispensing and associated tasks and the production of sterile and non-sterile products.

Roster pharmacy technician staff to cover work areas and hours of service as required.

Source: Tasmanian Department of Health and Human Services. Reproduced with permission.

The training of pharmacy technicians is provided at a number of centres throughout Australia, mostly at Certificate III level but some at Certificate IV. Some of the competencies may require training at specialised centres, such as the handling of cytotoxic (anticancer) drugs, which have significant occupational health and safety risks.

The Society of Health System Pharmacists of Australia (SHPA) provides specific arrangements for technicians at its conferences and provides information on training courses on its website. Technicians are eligible to be technician members of SHPA.

2.5.2 Local government planning assistants

The following section is an extract from the Planning Institute of Australia's (PIA) website that sets out clearly the reasons for employment of planning assistants and the courses available.

Box 2 Outline of the arrangements for Planning Assistants

The recent PIA National Inquiry into Planning Education and Employment acknowledged the difficulties faced by the profession due to the shortage of professional planners. It found that, primarily due to a shortage of planners, 40% of organisations were employing planning assistants, to help with research, public enquiries, report writing and routine development assessment.

The engagement of planning assistants is a way to ease the shortage of planners, free up planners to do more complex work and provide skill training for administration staff. This is particularly the case for rural local governments where local people with strong ties to their community can provide valuable planning support in local government planning departments.

A number of states have recognised the contribution which planning assistants can make, as a result of which State planning departments, PIA, local government organisations and recognised training providers have worked together to develop appropriate training packages and, in some cases, to provide opportunities for assistance with training costs.

With the current shortage of qualified planners the use of planning assistants will remain an essential element of many planning departments – and the profession can play a role in ensuring suitable training programs are available and accessed.

Training Courses – currently available

The following courses for Planning Assistants/Technicians are currently available. Other courses are being developed and details will be provided as they become available.

Victoria - Swinburne University of Technology:

Certificate IV in Local Government (Planning) http://www.icsswin.com/courses/9_3.html

New South Wales – University of New England

From 2006, the University of New England will offer a short undergraduate Diploma in Town Planning, by distance education. Details can be obtained from:

<http://www.une.edu.au/geoplan>

Queensland – Local Government Association of Queensland

Details of a Diploma in Local Government (Planning) for employees of Local Government Councils, who are LGAQ's subscribing members. The course will be available soon.

South Australia - TAFE

TAFE SA currently offers a Certificate IV in Local Government (Planning and Management of the Physical Environment). Details can be obtained from:

http://www.vlepub.sa.edu.au/xml/courses/Course_2006BEGLYX.aspx

Source: http://www.planning.org.au/index.php?option=com_content&task=view&id=276. Some of the course descriptions above have been abbreviated.

As can be seen from the above, the courses offered cover a range of training levels from Certificate IV to Diploma level.

2.5.3 Local government building surveyors

A national framework involving two levels of building survey has been developed under the auspices of the Australian Institute of Building Surveyors (AIBS).

The Building Surveying National Accreditation Framework identifies the Building Surveying profession via levels of responsibility. It is set out in Table 1. These levels align with Diplomas, Advanced Diplomas, Degrees and Post Graduate qualifications.

The rider at the end of the Table recognises and facilitates the activities of the third level of building surveying workforce – the building surveying technicians (once known as building inspectors) who in some States have the power under legislation to certify the type of structures outlined in that rider. In other States they must work under supervision/direction of the building surveyor. In effect the new framework moves away from allowing people with the third level qualifications certifying any structures after a further five years.

Table 1 The AIBS National Accreditation Framework

Category	Work Scope	Qualifications Experience	Generic Functions
Level 1 Building Surveyor	Unrestricted (can work on all classes and size of buildings)	<ul style="list-style-type: none"> • Degree in Building Surveying, or RPL within 5 years, plus • 3 years relevant experience 	Assess/approve plans Undertake inspections Approve building occupation/use
Level 2 Building Surveyor	Restricted to a maximum of 3 storeys with maximum floor area of 200m ²	<ul style="list-style-type: none"> • Advanced Diploma plus 2 years relevant experience, or • Working at this level at time of framework implementation 	As above
<p>NB: Individuals who are employed by Local Government Authorities may, as prescribed by State and Territory Administrations, carry out designated certification and inspectorial functions in respect of structures (including domestic buildings) that are no more than two storeys in rise, with a maximum floor area of 500m². Such personnel would be required to hold (at minimum) a Diploma in Building Surveying and have at least one year's relevant experience. (This does not operate in all States and is only in place for five years from date of NAF adoption).</p>			

Source www.aibs.com.au/

3 Frameworks for the training and employment of EHPPs

3.1 *The desirability of EHPPs – further feedback from consultations*

As outlined in section 2.3, the consultative process demonstrated that there is a range of views on the desirability of EHPPs and their likely ability to make an overall difference to the environmental health workload.

The persons consulted who expressed a conservative view sometimes saw little benefit in training and appointing EHPPs, as (they thought) nearly everything would still have to go past the EHO and so they may as well do it themselves. This group as well as others tended to be the most concerned that local government would appoint EHPPs in place of EHOs and would result in decreased, not increased, environmental health capacity.

If EHPPs did go ahead, some persons consulted wanted see they were kept at the Certificate IV level and were not encouraged to continue to Diploma level and beyond, unless they enrolled in EHO training. On the other hand others (those who supported the concept) were concerned to see a ladder up which EHPPs could progress, potentially but not necessarily to full EHO status.

In Tasmania, there was concern that the current arrangements employing cadets (trainee EHOs) could be undermined by the creation and employment of EHPPs. However, in practice it seems likely that the current arrangements will be disrupted by the move to the degree course rather than by any move to employ EHPPs. Indeed the capacity to do so may be welcomed if cadets disappear.ⁱ

It was sometimes pointed out that the current legislation allows EHPPs to operate now in many if not most jurisdictions. Few of the duties that EHOs undertake require specific legislative authorisation beyond that in Local Government Acts, or else the CEOs of the Councils have the power to appoint whomever they deem competent to undertake environmental health work under the Public Health Acts – ie there is no restriction to authorise only EHOs. In the area of food, it is becoming common for the legislation to be separate from other public health legislation and for it to refer to authorised officers, if not now then in the foreseeable future (see for example, the WA Food Bill) and it is likely that some of the new Public Health Acts will also refer to authorised officers, with mechanisms such as guidelines outlining the characteristics as to who should be appointed.

Those who supported the idea of EHPPs, including some from senior ranks of the AIEH, saw this as a means of addressing both some of the more immediate workforce issues and a means of recruiting prospective EHOs over the longer term, by the EHPPs enrolling to do the relevant degree in time. Most thought the entry point should be sub-diploma level, around Certificate III or IV and the competencies should be set to achieve this (see next section). This is a higher level than the usual entry point for training in a trade, which is Certificate II and/or III.

ⁱ A model for using undergraduate EHO trainees as ‘cadets’ developed by the City of Salisbury (SA) was provided to the consultant by a third party. This may be of interest in Tasmania and elsewhere in the employment of trainees as cadets.

The strongest support for EHPPs was from most (but not all) officers in State and Territory health agencies. They were concerned about the declining capacity of the local government environmental health workforce. They saw the need for EHPPs to redress this, notwithstanding the risks perceived by others. They were more likely to take the view that EHPPs would top up the existing workforce rather than replace it, *provided* the framework under which the EHPPs are appointed was appropriate, ie in safeguarding the EHO role. They are also concerned about maintaining capacity to deal with environmental health emergencies. The AIEH also supported EHPPs in the appropriate supervisory and training framework.

In summary, the weight of opinion amongst leaders in environmental health as expressed during this project, the employment of environmental health assistants in various guises in some local governments now, the ongoing bleak outlook for the environmental health workforce, and the general trend for essentially all degree-level professional to have certificate- or diploma-level assistants working with them, makes a compelling argument for more formal arrangements in the training and employment of EHPPs.

3.2 Existing frameworks

3.2.1 The Local Government Training Package.

One possible framework that has been developed by ANTA (now part of the Department of Education Science and Training (DEST)ⁱⁱ) to assist local government in addressing workforce needs across a range of areas is the Local Government Training Package (LGTP) LGA04⁸. Under the specialist qualifications training stream there are Certificate III, Certificate IV and a Diploma-level qualifications, which have been fully developed and approved by State Governments for training subsidies. This provides the opportunity for an immediate start for EHPP training, without need to design courses and units and have them approved.

3.2.1.1 Characteristics of learning outcomes for Certificates III and IV and Diploma level courses

A set of 'characteristics of learning outcomes' (levels of responsibility in the workplace intended for each qualification) is set nationally for *all* vocational education. For Certificates III, IV and Diploma level they are:

Certificate III Breadth, depth and complexity of knowledge and competencies would cover selecting, adapting and transferring skills and knowledge to new environments and providing technical advice and some leadership in resolution of specified problems.

This would be applied across a range of roles in a variety of contexts with some complexity in the extent and choice of options available.

Performance of a defined range of skilled operations, usually within a range of broader related activities involving known routines, methods and procedures, where some discretion and judgement is required in the selection of equipment, services or contingency measures and

ⁱⁱ Government Skills Australia now has responsibility for local government training needs and would be the organisation responsible for the revision of the LGTP.

within known time constraints.

Applications may involve some responsibility for others. Participation in teams, including group or team coordination, may be involved.

Certificate
IV Breadth, depth and complexity of knowledge and competencies would cover a broad range of varied activities or application in a wider variety of contexts most of which are complex and non-routine. Leadership and guidance are involved when organizing activities of self and others as well as contributing to technical solutions of a non-routine or contingency nature.

Performance of a broad range of skilled applications including the requirement to evaluate and analyse current practices, develop new criteria and procedures for performing current practices and provide some leadership and guidance to others in the application and planning of the skills.

Applications involve responsibility for, and limited organisation of, others.

Diploma Breadth, depth and complexity covering planning and initiation of alternative approaches to skills or knowledge applications across a broad range of technical and/or management requirements, evaluation and coordination.

The self-directed application of knowledge and skills, with substantial depth in some areas where judgement is required in planning and selecting appropriate equipment, services and techniques for self and others.

Applications involve participation in development of strategic initiatives as well as personal responsibility and autonomy in performing complex technical operations or organising others. It may include participation in teams including teams concerned with planning and evaluation functions. Group or team coordination may be involved.

The degree of emphasis on breadth as against depth of knowledge and skills may vary between qualifications granted at this level.

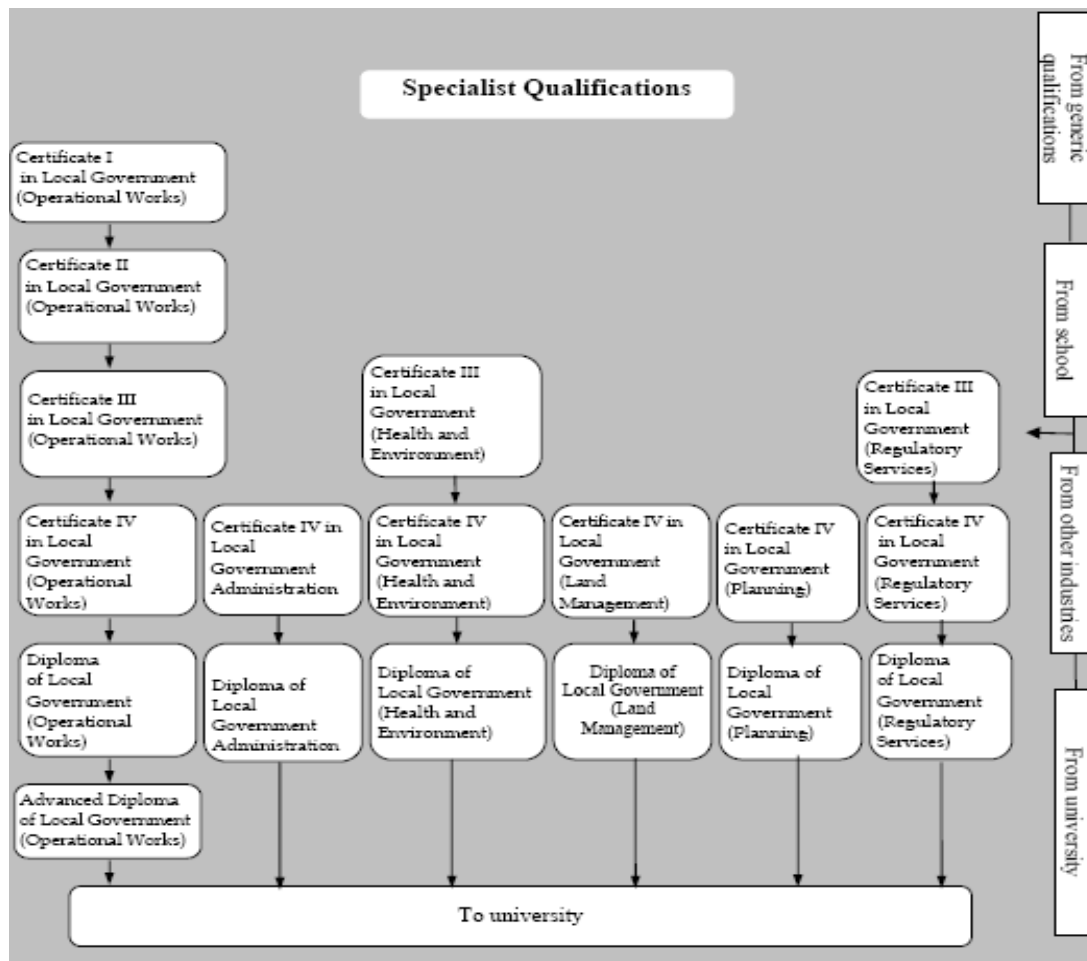
3.2.1.2 Overview of the local government training framework

A pictorial representation of the specialist qualifications in the Package is provided in Figure 2 below.

The framework of the courses consists of:

- Common units – that reflect the broad range of skills that are required in local government
- Specialist units that provide the necessary depth of skill, and
- General elective units that provide flexibility for local government and potentially other employers.

Figure 2 Specialist qualifications framework from the Local Government Training Package



Source: Local Government Training Package

3.2.1.3 Consideration of the LGTP framework for Certificate III, IV and Diploma level courses in more detail

The framework for specialist qualifications for certificate III, IV and Diploma level is as follows:

Specialist Qualification	Min. no. of units from common pool	Min. no. of specialist units	Max. no. of general elective units	Including max. no. of imported elective units	Total no. of units for the qualification
Cert III	5	4	3	3	12
Cert IV	4	5	3	3	12
Diploma	4	4	2	2	10

There are a set of packaging rules that establish the number and type of units that can be recognised when upgrading from one level to a higher level.

It is understood there has been little take-up of these courses, apparently because of a lack of support for the idea at the time it was developed, and a development process that seems not to have involved some stakeholders. Nevertheless, an objective assessment of whether it could form the basis of EHPP training is necessary.

From the above one can see that the number of specialist environmental health units that a person holding Certificate III, or even Certificate IV qualifications has completed may be quite small, potentially leading to significant gaps in overall technical knowledge. This is taken account of elsewhere in the report.

The Health and Environment specialist units that are offered are listed in Appendix 4. As can be seen from that list, there is a reasonable range of specialist units that have detailed descriptions prepared for each unit including:

- competency elements and performance criteria for each competency element;
- identified knowledge and skill levels.

One might argue that the units are not always optimal, for example, the grouping together of drinking water, waste water and recreational water testing may be too broad in general and too narrow for any one part, given the resurgence of water as an environmental health issue in many settings. Also, given the breadth of environmental health issues there may be areas that are not covered in the list in Appendix 4, but the framework allows units from outside the main course to be included and further units could easily be developed once the demand was there. Similarly many of the units are essentially environmental rather than environmental health and students who have done these rather than units oriented towards human health protection may have significant knowledge gaps. Nevertheless, scrutiny of the units and their content lead one to conclude that if the appropriate units in this framework have been studied, then the EHPP would be reasonably competent to perform a number of technical functions under the supervision or direction of an EHO.

One potential risk is that it would be possible to complete a qualification but have knowledge gaps, for example, without any units on water at all. If the EHPP was then asked to undertake duties that required a basic knowledge of environmental health issues relating to water, they would not be able to do so safely. Clearly the employer must ensure this does not occur.

3.2.2 The Population Health Framework

Recently a population health training framework has been published by the Community Services and Health Industry Skills Council (CSHISC) for and in collaboration with the wider population health sector.

This framework describes the content for three levels of training – Certificates II, III and IV mainly focussed on the training needs in Indigenous environmental health. Each course consists of a core of compulsory generic/organisational as well as technical units of competence, and a range of non-compulsory technically or community-oriented units. The courses offered that are of particular relevance in the context of this report are the Certificate III, IV and Diploma of Indigenous Environmental Health.

There has long been an effort to improve the environmental health conditions in Indigenous communities, particularly those in remote Australia, through the training and employment of Indigenous environmental health workers (IEHWs). There is widespread recognition that environmental health workers in remote Indigenous communities have made a substantial difference to the health status where they have been employed. The role and training of IEHWs has been supported by the AIEH. It recognises the overwhelming need and special circumstances in Indigenous communities that makes the usual approach via local governments unsuccessful.

The importance of the Indigenous environmental health model, when considering general EHPP training and employment, is the proven difference that mid-level technical support can make in improving environmental health. Differences in the nature and degree of environmental health challenges between non-urban Indigenous settings and the environments that local governments generally face, mean that required competencies (and therefore the course content) will differ to a degree, but the success of the Indigenous environmental health model establishes a compelling case for implementation of a similar model in non-Indigenous settings.

The technical units in the IEHW courses range from universal environmental health risks, to ones that are found much more commonly in Indigenous community settings, such as improving dog health as a means of improving human health. The units differ from those that might be required in a (non-remote) local government setting in emphasis and degree, but the science behind them is universal.

Eleven of the units from the LGTP are recognised by the Indigenous Environmental Health Diploma, including six specifically relating to environmental health. The six are identified in Appendix 4. The other units recognised are more generic in nature.

Training in Indigenous environmental health is offered at centres throughout mainland Australia. A typical suite of Certificate II to IV training is provided, for example, in the Batchelor Institute of Indigenous Tertiary Education's 2006 Handbook (available at www.batchelor.edu.au). Batchelor also offer an Applied Science Degree in Environmental Health that will lead to eligibility for AIEH recognition as an EHO. It is understood that there are over 20 students from all over Australia enrolled in the degree course, all of whom are Indigenous (X Schobben, personal communication).

Consideration has been given to Indigenous environmental health training as a model for non-indigenous settings. Certificate II provides so little opportunity for technical content that it is difficult to see that it would be of value in covering any but the most basic concepts for an officer working in a local government or similar setting. Certificates III and IV, however, provide more scope and are more consistent with a training level for persons often working under direction rather than supervision.

The population health framework provides a suitable basis for non-Indigenous EHPP courses, but the units required have not been developed other than for Indigenous health. Some of those units that have been are, of course, suitable for a more general course but more specialist units would be required.

It would be a waste of resources and confusing if further units developed for EHPP training developed under the population health framework did not parallel the units set out in the LGTP. It is heartening to note the units that have already been adopted

one by the otherⁱⁱⁱ. It is imperative that the two frameworks are drawn together. In the first instance, this may simply mean the population health training package adopting suitable units from the LGTP for non-Indigenous environmental health courses, developing new units where there are gaps. When the LGTP is revised in 2007, it should either defer to or copy relevant population health units as the population health training package expands and vice versa. The sponsors of the two packages need to work together to maximise efficiency and minimise confusion.

3.2.3 Training pathways

Many of the persons consulted emphasised the necessity for EHPPs to have a training pathway that allowed them to progress through to become fully trained EHOs. This is clearly necessary for two reasons – first because the EHO workforce needs to be bolstered by every means available, and second because of equity – if the person is capable of it they should be given the opportunity to do so. Typically the pathway is from Certificate to Diploma to Degree. Initially there will be little demand for Diploma level as there are no Certificate-level recruits, but as happened in Indigenous health, once a there is a sufficient cohort of Certificated EHPPs they will be seeking further progression. At that time there will be training organisations only too willing to offer these people Diploma-level training. This is the same hierarchy that is provided in the Population Health Framework and is inherent in the LGTP.

3.2.4 Maintaining competency

Concern was expressed in regard to the maintenance of competency for the EHPPs. While this is important, it will be less of an issue if the supervising EHO's knowledge is up-to-date, as the activities will be conducted in accordance with the EHO's directions and in accordance with protocols approved by him or her.

The time to address a more formal approach to competency maintenance is when mandatory continuing professional development is addressed for EHOs themselves. AIEH is understood to be developing a continuing professional development program for EHOs and this should be extended to include EHPPs in due course. It may possible to utilise the same activities for both EHOs and EHPPs, with perhaps a lower level of participation (eg. fewer hours required) for EHPPs.

3.2.5 Nomenclature

The use of the generic 'Environmental Health Paraprofessional' is clearly not feasible in the long term. There is controversy about the use of the term 'technician' but it is widely used for this level of officer in other areas of health, and in environmental health in other countries.

In local government the term in wide use is 'assistant', eg. planning assistant. This has the benefit of emphasising the subsidiary role of the EHPP to the EHO, but that is also its drawback – it is a less attractive term than technician in a marketing sense. For that

ⁱⁱⁱ The Population Health preamble of the Health Training Package states "It is acknowledged that an overlap exists in terms of the environmental health qualifications in the LGTP... It should be noted that The environmental health qualifications in the LGTP are not supported by the AIEH. The Institute has however in past consultations expressed strong support for the Indigenous environmental health qualifications." Efforts must be made in the next revision of the LGTP to overcome the objections of the AIEH, at least in relation to the training of EHPPs. for areas of practice outside Indigenous environmental health.

reason, Environmental Health Technician is recommended as the general term used to describe the role of such persons.

3.2.6 Summary on existing frameworks

The Indigenous environmental health experience demonstrates the feasibility of EHPPs in certain settings, and the case to broaden it out to environmental health more generally seems compelling given the grave workforce issues that the sector faces.

Given that, the LGTP provides a training structure that is quite suitable for Certificate III and IV training. While The Package has its critics, it is at least a good place to start. The Package is due for review in 2007 and through appropriate consultation with local government, the AIEH and enHealth, as well as the relevant 'owners' of the two training packages (Government Skills Australia and CSHISC), it should be possible to develop a widely accepted structure in the next revision of the LGTP. As the population health framework is developed it is imperative that units are either dual-listed or one training package defers to the other. The LGTP should only need minor change – most of the elements are there, but in the long run it may be preferable to have environmental health training in a health training package.

Recommendations

- 1. That State and local governments work together to commence training of environmental health paraprofessionals with the intention that most trainees will be employed in local government, under the supervision of Environmental Health Officers, performing tasks appropriate to their training and competence at the time.**
- 2. That Certificate III be the minimum entry point for non-Indigenous environmental health paraprofessional training and there also be offered an immediate opportunity to undertake Certificate IV training.**
- 3. Over time, Diploma level training also be provided, particularly if this is required to provide the stepping stone to full qualification as an Environmental Health Officer.**
- 4. The Local Government Training Package be used as the initial basis to formulate the Certificate III and IV courses under either the local government or population health frameworks.**
- 5. In promoting the development of the population health framework in this area, the Environmental Health Committee strive to ensure that the development and revision of the population health and local government training packages for environmental health paraprofessionals are coordinated and accepted by all stakeholders for the purpose of that training.**
- 6. The officers trained or training in this way should be known as Environmental Health Technicians (or trainee technician if appropriate).**

4 A risk management framework for the employment of EHPPs

4.1 Key elements in managing the risk

There are four key elements in the introduction of EHPPs to the environmental health workforce arrangements in local or State/Territory government that need to be considered in the workplace. EHPPs must work in a framework that ensures EHPPs:

1. are trained and competent in the area to which they are assigned.
2. are appropriately authorised under the relevant legislation, in line with their demonstrated competencies.
3. work under the supervision or direction of an EHO; and
4. undertake activities that have been risk-assessed as appropriate for the EHPP to perform.

In relation to 2), the authorisation is assumed to be under the relevant public health legislation but for many activities there may be sufficient power under local government legislation to provide the required level of authority, depending upon the particular task and provisions in the legislation.

The EHPP will work under the supervision or direction of an EHO, but for some tasks other professionals may have a temporary leadership role, eg if the EHPP works at an immunisation clinic once a week, the manager in that area may supervise the EHPP while they work in that area. These situations will be the exception rather than the rule.

Part of the risk management under 4) is the performance of most technical tasks by EHPPs in accordance with written standard operating procedures (SOPs) or other protocols. These ensure the task is performed consistently and within certain boundaries. SOPs should be the rule for all staff undertaking tasks that are not 'one-off' in any case. This manages inherent risk in an intended way that has been thought through. It ensures risks are not overlooked or inappropriately addressed.

Recommendation

- 7. That all Environmental Health Paraprofessionals work in a setting that ensures they:**
- are trained and competent in the area to which they are assigned.
 - are appropriately authorised under the relevant legislation, in line with their demonstrated competencies.
 - work under the supervision of an Environmental Health Officer; and
 - are assigned activities that have been risk-assessed as appropriate for them to undertake.

4.2 Competencies that may be required by EHPPs for the tasks they undertake

As outlined earlier, those who took a conservative view of the role of EHPPs thought there would be little they could do without close personal supervision of an EHO, and so there would be little additional efficiency. However, consideration of the roles of an EHO and roles an EHPP could potentially fulfil suggests this is not the case. An attempt to consider the tasks an EHPP might undertake in some of the key areas of environmental health is provided in Appendix 3. This Appendix is based on the premise that the EHPP would be trained to around Certificate III or IV level and their training includes the specific technical training relevant to a particular task or work area.

Appendix 3 assumes that the work undertaken by EHPPs does not require judgement to be exercised. Most if not all tasks should be done with the aid of protocols or Standard Operating Procedures that ensure consistency and risk management. Where tasks go outside these defined practices, then the EHPP must refer the task to the EHO for advice before continuing. There is a view that such protocols should be 'system-wide' but in practice there will be local issues that require local content in the protocols. That is not to say, however, that a set of national models is not possible – they could be developed and would be of great use to local governments and others.

While Appendix 3 does not attempt to be anything more than indicative, it does suggest there are many areas where a useful role could be played. It was prepared based on other similar draft documents that were provided to the consultant during the project, and considered the competency levels outlined for Certificate III and IV in the LGTP. Clearly if the person was more highly trained the breadth of tasks they could undertake, and the degree of job delegation, may be greater than suggested in this Appendix.

The performance of the tasks is intended to be in accordance with the principles outlined in section 4.1. These principles provide reasonable safeguards against unfettered activity by energetic but poorly supervised EHPPs, while also preventing employers (local government or other) from employing only EHPPs to the exclusion of EHOs. There is no lessening of the centrality of the EHO role to good environmental health practice in local government.

4.3 Supervision and direction

One area in which concern has been expressed is the meaning of supervision, direction, or other terms used to determine the relationship between the paraprofessional and their supervisor. Unless defined under legislation the terms will have the ordinary dictionary meaning.

In this report, supervision is intended to include directing the operation of a task. Supervisions is commonly conducted at three levels:

- Close personal supervision. This implies standing and watching the person perform a task. It is much more rigorous than normal supervision. This may be done, for example, when a tricky procedure is being undertaken for the first time or first few times, but generally the types of task the EHPPs undertake are not often going to require this level of scrutiny.

- Supervision in the ordinary sense, including some level of direct observation and/or checking how the task is being done **during** its execution. It is conducted within sight and sound of the person doing the task.
- Direction as used in this report means allowing the person to undertake the task without necessarily observing its execution directly, but relying on training, skill, past experience and following written procedures to ensure the person undertaking the task does so competently. The person is considered capable of reporting back anomalies and concerns appropriately.

When this lighter level of control is appropriate will naturally depend upon the training and experience and of the EHPP – in the judgement of the supervising EHO. It will also depend upon the availability and quality of written procedures that describe the execution of the task.

The report does not refer to close personal supervision at all, so where supervision is referred to it is as set out in the dot point above, and direction is also used as set out above, but supervision is intended to include direction at the discretion of the EHO. They will determine when it is appropriate to move from ‘within sight and sound’ supervision to the more remote direction stage.

It is difficult to define a set of rules that set out when direction is appropriate. It will depend upon the task, availability and quality of guidelines, and the level of risk inherent in that task; as well as the training and experience of the particular EHPP. The relationship (level of trust) between the EHO and the EHPP also plays a part. It must not be driven by organisational expediency. The risk management framework outlined above will address the risk of managers delegating tasks inappropriately.

5 Conclusion

It is imperative to ensure there is adequate environmental health capacity in local government. It is unlikely that relying on the current model of recruitment and retention of EHOs will provide this. Some thing different must also be done, although EHPP training alone (even if highly successful) will not solve the environmental health workforce crisis and other steps must also be taken.

It is clear that environmental health technical support is already widely used in local government now. The AIEH recognises this and supports a more formal system of training EHPPs, provided the central role of the EHO is maintained.

Training and employment of EHPPs will still not address the whole range of environmental health workforce issues even if the initiative is an outstanding success. Nevertheless, they will help and it is likely that it will improve rather than detract from the role of the EHO in local government. They should provide freedom from some of the routine tasks for EHOs and allow a focus on more strategic environmental health approaches.

The entry point for EHPPs should be not less that Certificate III. Any lower will lead to skills that are insufficient to allow work under direction, with acceptable risk, within a reasonable timeframe. Conversely making the entry level too high will preclude many and may lead to the same recruitment problems that we already have in environmental health.

The framework appears to fit most logically under the Population Health training stream, but given the existence and general suitability of the LGTP as outlined in section 3.2.1.3, utilising it initially allows rapid commencement of the program. This is clearly desirable given the immediate workforce gaps. If there are problems or anomalies in the LGTP, there is the opportunity to address these during the next revision. Whatever happens, is it essential that the there is not duplication, competition and confusion between the Population health and local government training packages for EHPPs.

Appendix 1 Terms of reference

The terms of reference for this project are:

Under the overall guidance of the Environmental Health Project Advisory Committee:

1. Examine relevant environmental health workforce studies from Australia and overseas, particularly literature on the use of technicians to support Environmental Health Officers or other similar professionals.
2. Examine in-practice models of technicians in supporting other professional officers in other relevant areas, such as Building Surveying, Engineering or Town Planning, as well as Indigenous EHWs and other health professionals.
3. Develop and conduct an agreed consultation strategy that considers the views of key stakeholders in environmental health on future workforce arrangements, particularly concerning the use of environmental health technicians. Consultations should include face-to-face and/or telephone consultations with a suitable sample of relevant personnel from State and Territory health agencies; environment agencies where appropriate; Local Government including ALGA; relevant educational institutions and the Australian Institute of Environmental Health.
4. Develop recommendations for the scope and practice of the positions, linked to the qualifications and experience required, and the level of supervision required where relevant for environmental health paraprofessionals. This should be developed with a view to eventual incorporation into a wider framework that encompasses the broader environmental health workforce.
5. Prepare a draft report for consideration and comment by the Project Advisory Committee, and a final report that takes into account feedback from the Project Advisory Committee.

Appendix 2 Persons consulted during the course of this project

Person	Organisation
Roscoe Taylor	Director of Public Health, Dept of Health & Human Services, Tas
Stuart Heggie	State Manager, Environmental Health, Dept of Health & Human Services, Tas.
Mark Dwyer	State President AIEH & Manager Environmental Health, Hobart City Council, Hobart Tas.
Ron Fry	National Director AIEH, Tas.
Christine Standish	Local Government Association of Tasmania
Steve Jeffes, Michael DiGiovanni	Built Environment Group, TAFE Tasmania (includes EH teaching)
James Doherty, Adele Gliddon	Launceston City Council, Tas.
Michael McGee	Industry Liaison Officer Office of Post-Compulsory Education & Training
Bruce Morton	National President AIEH, Brisbane
Jan Bowman, Thomas Mitchell, Philip Montalto, Noel Cleaves	Environmental Health Unit, Department of Human Services, Victoria
Carol Bate, Jodie Eden-Jones	Food Safety & Regulatory Activities
Andrew Demidowski	President, AIEH Victoria.
Michael Staff	Director Environmental Health NSW Health
Tony Kolbe	Director Population Health, Greater Southern Area Health Service, NSW
Jim Dodds	Director Environmental Health, Dept of Health, WA
Richard Lugg, Simon Dennis, Owen Ashby	Environmental Health Branch, Dept of Health, WA
Kevin Buckett	Director Public Health, Department of Health, SA
Xavier Schobben	Director Environmental Health, Northern Territory, and Chair, National Indigenous Environmental Health Forum
John Dempsey	Environmental Health, DoHA, ACT
Melissa Langhorne	Manager Environmental Health ACT Health

Nancy Cromar	Flinders University, SA
Dean Bertolatti	Head Environmental Health, Curtin University
Sophie Dwyer, Chris Healey, Brian Penman	A/Deputy Secretary Population Health, and Environmental Health Unit, Queensland Health
David Hancock	Principal Specialist Environmental health, for SEQ Regulation Reduction Incentive Group
Belinda Davies	Environmental Health Branch, Brisbane City Council – QUT joint appointment.
Anne Neller	Senior Lecturer, Health & Environment, Sunshine Coast University
Prue Madsen	Government Skills Australia
Michael McGee	Industry Liaison Officer, Office of Post-Compulsory Education & Training, Devonport Tas.
Diane Aldous	Pharmaceutical Advisor, Dept of Health & Human Services, Tas.
John Ravlic	Local Government Managers Australia

Appendix 3 List of tasks that EHPPs could undertake in common key areas of environmental health, each at an appropriate level for the position held

The table is not intended to be an exhaustive outline of the role of an EHPP, but serves to illustrate the sort of function they may fulfill and the level at which they usually would work assuming they have Certificate III or IV level training. It utilised existing course frameworks and similar documents provided to the consultant in developing these examples.

It outlines a training, skill or activity required to undertake a function for most paraprofessionals most of the time. It is not expected that any EHPP would perform competently across the whole range of activities that environmental health encompasses. Likewise, the person may have done advanced training and have extensive experience in a particular area and thus be able to perform at a significantly level higher than is indicated below. If the person has not had any training or experience in a particular area they will not be able to perform this function without that training and other skill development. The must not be asked to do so.

The table attempts to take a risk-based approach – areas of higher risk are either excluded or require the work to be supervised. Areas of lower risk are conducted semi-independently or under direction but not personal supervision. In remote areas, the training and experience will need to have reached a point where the overseeing EHO is confident to have the EHPP work under direction as supervision will rarely be practical. Most of the activities must have Standard Operating Procedures or protocols or simple checklists that enable the activity to be done safely and consistently, as the EHPPs should not be required to make independent judgements.

The Appendix assumes that work undertaken by EHPPs does not require judgement to be exercised. Most tasks should be done with the aid of Standard Operating Procedures that ensure consistency and manage risk. Where tasks go outside these defined practices, then the EHPP must refer the task to the EHO for advice.

Generic function:	Training, skill or activity relevant to that ability
Oral communication	Some training, adequate skills
Report writing	Some training, adequate skills, eg may write short narrative reports or complete reports in structured format accurately.
Presentation skills	Some training, adequate skills
Knowledge of principles of occupational health and safety	Some training, adequate skills
Knowledge of risk assessment and risk management	Sufficient training and understanding to be able to work within a risk-based approach.
Knowledge of the operation of local government and its place in the system of government.	Understands the roles of local government and state government on issues being dealt with.

Food standards and food hygiene	
Food premises	<p>Able to conduct compliance monitoring.</p> <p>Maintains records and identifies and reports on non-compliance or risks.</p> <p>If (advanced) trained (ie specialist in food area) able to conduct simple audits eg in lower risk food premises, or in more complex premises with a good record of compliance.</p>
Food sampling	Samples under supervision. If advanced trained able to conduct sampling under direction.
Food labelling	Able to assess labels against specific requirements, but not research what the requirements are.
Food recalls, seizure, disposal etc.	Provided assistance only.
Water and wastewater	
Potable water	Able to conduct testing in accordance with protocols, record and assess results, identify problems for attention of EHO
Recreational water	Able to conduct testing in accordance with protocols, record and assess results, identify problems for attention of EHO.
Waste water management	<p>Able to assess likely safety and effectiveness of installed greywater and blackwater disposal systems, including operation of ATUs, by on-site inspection and testing if required (able to assess tests req'd and identify aberrant results).</p> <p>Able to provide advice on general requirements for on-site effluent disposal but not site-specific requirements unless advanced training.</p>
Other waste management	
Solid (putrescible) waste management	<p>Understands health risks and management approaches to handling of putrescible waste, in accord with need for operator and public safety.</p> <p>Able to manage straightforward waste management tasks under direction.</p>
Toxic and noxious waste management	Work under supervision on tasks set but not key skill unless specialised training undertaken.

Pest control	
Vector borne disease control – mosquitoes etc	<p>Able to conduct mosquito trapping and simple identification of mosquitoes under direction or in accord with plan. Record and report on results, and identify general level of risk (high or low) of disease.</p> <p>Able to conduct or oversee simple control operations (eg land based spraying) in accordance with predetermined plan or under EHO direction.</p>
Other pests – eg vermin (rats and mice), cockroaches, dogs, etc.	Able to assess risks, and undertake or advise on <i>simple</i> control strategies that are used routinely in that district for that pest, in accord with local protocols
Safe use of pesticides in general	<p>Work under direction on tasks set but not key skill unless specialised training undertaken.</p> <p>Able to refer inquiries appropriately.</p>
Other infectious disease control	
Foodborne disease outbreak identification and investigation	<p>Understands causes of and risk factors related to food borne disease.</p> <p>Works under supervision on straightforward tasks.</p>
Other environmentally acquired disease investigation eg legionella, hepatitis A	<p>Understands causes of and risk factors related to the disease.</p> <p>Conducts environmental sampling in accord with protocols, or under supervision.</p>

Housing	
Individual houses	Check and report on compliance with eg BCA for areas of health interest, such as condition of bathroom, septic system and its functioning, etc (where this activity is the responsibility of the local government or health agency).
Lodging houses etc	Check and report on compliance with eg BCA for areas of health interest, eg condition of bathroom, septic system and its functioning, etc (where this activity is the responsibility of the local government or health agency) If advanced training, check other risk areas in accordance with protocol under direction.
Public assembly areas	Implement risk management strategies under direction of EHO (eg assess numbers in public building such as a nightclub, assess compliance of exits etc.) and report anomalies to EHO
Immunisation	Provide assistance as required under supervision of EHO or Nurse or Medical Practitioner
Emergency management	Provide support under supervision
Nuisance management, including:	
Noise	Handle public inquiries. Respond to simple issues or refer appropriately. Undertake simple measurements in accord with Standard Operating Procedure (SOP) or other protocol under direction.
Pollution (eg air pollution from eg smoke)	Handle public inquiries. Respond to simple issues or refer appropriately. Undertake simple measurements in accord with SOP/protocol under direction
Other	
Management of 'health' complaints eg: neighbour's use of chemicals, storm water run off etc.	Handle public inquiries. Respond to simple issues or refer appropriately.

Appendix 4

Units in the Environmental Health component of the Local Government Training Package. Units that have been adopted in to the population health package are shown in bold.

LGAEHRW201A	Collect waste refuse or recyclables.
LGAEHRH302A	Undertake water sampling and routine reporting
LGAEHRH303A	Undertake vector control duties
LGAEHRH304A	Perform weed control duties
LGAEHRH305A	Present environmental health education information
LGAEHRR301B	Monitor and control standards of accommodation
LGAEHRR302B	Monitor and control standards of public swimming pools
LGAEHRH403A	Operate waste transfer, collection station or landfill facility
LGAEHRR504B	Implement public education programs to improve community compliance
LGAEHRW505B	Implement strategies to minimise the impact of waste on the environment
LGAEHRH506A	Monitor premises to minimise the spread of infectious diseases
LGAEHRH502B	Implement immunisation programs
LGAEHRH510A	Contribute to public health emergency management plan
LGAEHRW503B	Implement programs for disposal and containment of waste
LGAEHRW601B	Conduct waste management audits and assess needs
LGAEHRR501B	Implement council's responsibilities in food safety
LGAEHRW507A	Plan and coordinate a waste collection or recycling service
LGAEHRW508A	Undertake education programs to achieve reduction, reuse and recycling of waste
LGAEHRR509A	Undertake environmental and nuisance controls
LGAEHRW603B	Coordinate the implementation of council's waste management strategy
LGAEHRH604B	Develop and implement environmental health education promotion and awareness strategies

Note: Two of the units included as electives in the population health training package from the local government training package have been deleted from the latest version of the latter. They are LGAEHRW607A *Plan for the controlled disposal and containment of residual waste* and LGAEHRW605A *Develop Council's waste management strategy*.

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