



RETAIL DRINKS AUSTRALIA

Retail Drinks Australia Submission
Tiered Industry Training Framework (TITF) Evaluation

DECEMBER 2020

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14 December 2020

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Submission – Evaluation of the Tiered Industry Training Framework (TITF)

Dear Dr Faunce,

On behalf of Retail Drinks Australia (**Retail Drinks**), we appreciate the opportunity to provide feedback in response to Liquor & Gaming NSW's (**L&GNSW**) [Evaluation of the Tiered Industry Training Framework](#) (TITF). Retail Drinks would also like to thank L&GNSW for the opportunity to participate in a stakeholder interview regarding the TITF evaluation last month.

As you would be aware, Retail Drinks has been closely involved in the development and implementation of the TITF since its inception, having been a member of the original industry training working group convened by L&GNSW alongside several other key industry stakeholders, as noted in the Discussion Paper on page 5.

Whilst Retail Drinks is pleased to provide specific feedback in response to each of the questions presented in the Discussion Paper, as a general note, we would emphasise the need to ensure that the TITF's delivery remains as flexible and cost-effective as possible to minimise the level of disruption for licensees' businesses and their employees.

Operation and management of licensed venues

- Do the training courses satisfactorily explain the responsibilities of liquor industry workers, secretaries/approved managers and licensees?

Retail Drinks is satisfied that the current training courses include sufficient explanation of the responsibilities of both liquor industry workers, approved managers and licensees.

- Has the training led to improvements in venue operation and management?

Whilst it is likely that the TITF has resulted in improvements to the operation of packaged liquor licences (PLLS), Retail Drinks would argue that an analysis of L&GNSW compliance data is necessary to determine the extent of this improvement. In order to determine whether the TITF has resulted in a significant level of improvement, the rates of non-compliance amongst all licensees prior to the introduction of the TITF should be compared to the compliance rates recorded since its introduction.

Conducting this comparison would also result in meaningful insights into other aspects of the TITF such as the level of comprehension and subsequent application of knowledge amongst specific licence types. Without access to compliance data prior to and following the implementation of the TITF, it is difficult to make a comprehensive assessment as to the level of improvement gained.

Retail Drinks would also point out that the introduction of the TITF has been supplemented by various industry self-regulatory initiatives which may have also led to improvements in the operation of packaged liquor businesses, such as the recently re-launched *ID-25* and *Don't Buy it For Them* initiatives (see [here](#)).

- Is the current training framework more effective than the previous training framework?

In terms of the TITF's overall effectiveness, it is again difficult to make a comprehensive comparison with the previous training framework, without access to relevant compliance data. Whilst there may be several aspects of the TITF which can be considered superior to the previous training framework, the ultimate arbiter of its effectiveness is the application of knowledge in a licensed environment. Whilst Retail Drinks has received anecdotal feedback from members attesting to the effectiveness of the TITF, it is unclear as to whether this has translated to improved compliance outcomes at an actual store level.

Factors driving and preventing participation in training courses

- What factors are enabling or preventing participation in training?

Whilst there are a number of factors both enabling and preventing participation in the training, Retail Drinks would emphasise cost and time as central factors in determining the propensity of a packaged liquor licensee to participate. In many cases, packaged liquor licensees are small businesses which are owned and operated by one person, therefore placing significant constraints on their ability to participate. In these instances, the time commitment involved in completing the course means that the licensee either has to find another person to operate the store for the duration of the course or close the store entirely. Given the significant impact on the operations of a store, Retail Drinks would emphasise the need to maintain flexibility for these licensees in having to complete the training.

- Has L&GNSW done a satisfactory job of promoting the availability of training?

In Retail Drinks' view, there has been an adequate level of promotion regarding the availability of TITF training from L&GNSW. In addition, Retail Drinks and its partner RTO have also sought to promote the availability of the training in complement to L&GNSW's work which has been successful in driving further enrolments in the courses.

Previously, L&GNSW provided Retail Drinks with a list of packaged liquor licences who had not completed the TITF by the necessary deadline. Retail Drinks was subsequently able to contact the relevant licensees at these businesses, encouraging them to complete the coursework and reminding them of their relevant obligations to do so. Retail Drinks would be pleased to do the same in the future for any new packaged liquor licences who have not completed the TITF.

- Do opportunities exist for regional NSW customers to attend face-to-face training?

Whilst it would be the preference of many rural and regional-based licensees to attend the training in person, in many cases, it is not practically possible or feasible for them to do so due to the constraints placed on these licensees. As such, it is necessary for these licensees to complete the course in an online/virtual format to overcome these practical limitations. Retail Drinks believes that the imperative of offering the training in a range of flexible formats is magnified when considering the needs of regional and rural licensees as a result of the logistical difficulties involved in travelling long distances to attend training in a face-to-face format.

- What costs are associated with the training courses?

Whilst the completion of the training frameworks incurs a cost in terms of enrolment, Retail Drinks would point out that this does not include the various other costs which may be involved in completing the course, including transport and accommodation costs. As mentioned in our previous responses, the costs involved in transportation and potentially accommodation are especially pertinent for licensees in regional and rural areas. In accounting for the various incidental costs involved in completing the course, the total cost can be significantly higher than the once-off enrolment fee.

Satisfaction with course content

- Are you satisfied with the quality and relevance of course content?

Retail Drinks has previously received anecdotal feedback from packaged liquor licensees in relation to the course content being too heavily weighted towards the on-premises environment and not containing enough content relevant to a liquor retail environment. In this respect, Retail Drinks believes that further information and examples specifically pertaining to the experiences of packaged liquor licensees could be incorporated within the course to improve the relevance of the content for this cohort.

Despite the fact that there is a proportion of the course content which is irrelevant to packaged liquor licensees, Retail Drinks would reiterate its previous recommendation that the TITF is not split into separate streams (i.e. one course for on-premises licensees and another separate course for packaged liquor licensees). Whilst proceeding with this option was discussed during the initial working group meetings, it was deemed that the mobility of workers and the propensity of these employees to swap between different types of businesses frequently outweighed the benefit of doing so.

- Are you satisfied with the format and delivery of the training?

In responding to the above question, Retail Drinks would reiterate the importance of ensuring diverse models of delivery, including virtual/online classrooms. Maintaining virtual/online delivery of the course is crucial given the varying needs and preferences of licensees, particularly those wishing to complete the course at their own pace and after business hours.

- Are the training materials provided in a plain English format?

Retail Drinks has not received any feedback from its members regarding the training materials being too difficult to interpret or understand due to complexities in the language used. The high proportion of licensees passing the assessment component of the TITF training would also suggest a lack of difficulty in comprehending the course content for this reason. Retail Drinks however would suggest ensuring that plain English is used whenever the course is updated to ensure a high level of comprehension is maintained.

- Are there any gaps in the content or methods of delivery of the training courses?

As per Retail Drinks' previous responses in this submission, we would recommend that additional content speaking to the experiences of packaged liquor licences be incorporated into the content of the training to address any perceived or actual gaps. This would also ensure that there is a balance in the material primarily directed towards on-premises licensees and packaged liquor licensees.

- Are there any other improvements that could be made to the training courses?

Retail Drinks' suggestions for improvements to the training courses would involve reducing the overall cost and time burden for licensees.

Meeting the needs of training participants

- Do the training courses represent value for money?

Whilst Retail Drinks does not dispute the fact that there is value to be gained by licensees in completing the course, it would stress the financial pressures on licensed businesses which in many cases have intensified due to COVID-19. In this respect, there is a strong imperative to ensure that the costs involved in completing the course are carefully considered to minimise the burden placed on licensees.

- Do the training course delivery options (face-to-face, virtual classroom, online) meet the needs of stakeholders?

As Retail Drinks has emphasised previously, ensuring that the TITF remains available in a wide variety of different formats to cater to the differing needs of licensees is crucial. The availability of the TITF in an online/virtual format means that licensees are able to complete the course at their own pace, rather than being required to complete the entirety of the course in one session which for some stakeholders may be more preferable due to a variety of reasons.

Feedback received from Retail Drinks members has indicated a strong preference to be able to undertake the coursework flexibly, for instance in three, three-hour blocks rather than in one continuous session.

- Do the training courses meet the needs of customers with English language or learning difficulties?

Given the high proportion of licensees passing the assessment component of the course, Retail Drinks believes that the individual needs of the majority of licensees are being met. Ensuring however that licensees with English language or learning difficulties are able to complete the training at their own pace is essential however, given that they may take longer to grasp or comprehend the information being presented compared to other licensees.

Thank you for your consideration of the matters raised within this submission. Retail Drinks looks forward to working closely with L&GNSW on behalf of NSW packaged liquor licences to ensure that the TITF remains an accessible, fit-for-purpose and cost effective training framework.

In the meantime, should there be any other matters which you wish to discuss with me directly, I may be contacted on 0429 969 614 or by email at michael.waters@retaildrinks.org.au.

Sincerely

A handwritten signature in black ink, appearing to read "Michael Waters".

Michael Waters
CEO, Retail Drinks Australia

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