

Public comment response template to Discussion Paper: Maintenance of Competence for Practising Certificates

Please send submissions by email to consult.minesafety@industry.nsw.gov.au
Submissions must be received by the due date of Monday 1 February 2016.

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Responses to discussion points

1. Is the proposed model for the MOC scheme suitable for application for practising certificate holders in NSW?

Response: Our general response is that it is difficult to provide a considered response when the method for establishing competencies in the first instance has not been determined. We consider that the establishment and maintenance of mining competencies for certificate holders is important. The WA system is well established and having worked under this system we know it works well and would be a suitable model for NSW.

Section 5.2 states that 'The department will provide details of a proposed system for issuing practicing certificates which the MOC scheme will operate under...'. Rather than put the 'cart before the horse' the establishment of competencies should be agreed and determined first, rather than maintaining something unknown.

Section 4 outlines the objectives for the MOC one of which is 'to refresh the competencies required to maintain the practising certificate' - if we do not know what these are we cannot determine if the model presented here and the training suggestions outlined, are indeed appropriate to meet this objective.

How does the model address persons who are absent from undertaking the role for the practicing certificate during the 5 years? For example, are absent from NSW for 2 of the 5 years? Can training be from other States? How does the model address persons operating between States and

2. Are the areas of competence and their topics suitable and cover the areas adequately?

Response: There is insufficient information to comment on some of these topics, in particular, Initiative?, Well-being? Methods? Services?

Perhaps Risk Management should be first on the Operating and safety systems list of competencies if the objectives outlined in Section 4 are to be met.

In regards to the 'formal' learning - who is eligible to provide formal this learning (ie in excess of the 4 hours) and how is this determined/approved? How is the criteria assessed for training sessions in excess of 4 hours and who will do this - will this be in a timely manner so that training is not undertaken which may not be eligible?

3a. Are the types of formal and informal learning with their maximum claimable hours suitable?

Response: How are percentages of topics determined for each practicing certificate holder?

Section 6.2 provides an example for an Electrical Engineering Manager and references 'a certain percentage' - how is this determined for each group?

How are the training hours spread over the 4 areas of competency - what is the split?

Without providing a definitive list some other topics - subsidence, confined spaces, manual handling, vibration, mobile equipment eg cranes etc. return to work.

3b. Is the percentage split between the minimum number of formal hours (66%) against a maximum of 33% for informal hours appropriate?

Response: How was the split determined? Appears OK.

4. Are the numbers of learning hours for each practising certificate and areas of competence appropriate to maintain competence a) per year b) over five years?

a) per year - response - Hours OK. However need to understand the split across competencies. How is learning across competencies to be addressed?

b) over five years? - response - Hours OK. However need to understand the split across competencies. How is learning across competencies to be addressed? Is not repeating the same training topics each year or during the 5 year period.

5. Are the requirements for certificate holders in the MOC scheme reasonable and practical?

Response: WA already have a system that works well. Why isn't this being adopted so we can gain some consistency across the States?

6a. Are the record keeping requirements for certificate holders to satisfy in the MOC scheme

Response:

6b. Are the governance processes proposed by the department adequate to ensure compliance with the MOC scheme by practising certificate holders?

Response: Some of the listed training may be difficult to validate, particularly some of the informal learning. How will validation be made for the hours of persons reading technical papers? Hours reviewing plans? Or conducting reprobable incident investigations? Etc