

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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Organisation (if applicable): Sole Trader

Responses to discussion points

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

Response: Proposed model may be applicable to practising certificate holders who are currently employed in the industry. However, it will make it extremely difficult for certificate holders who are unemployed, or employed in other industries. Unless there are courses available and at minimal or no cost to people in this situation, it will be costly to engage in MOC activities of the hours required

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

Response: Emergency response and Leadership, albeit important areas of competency, should not hold the same weight of MOC points required as the technical and legislative requirement.

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

Response: Again, maybe for those directly employed in the industry. Those not directly employed (or unemployed) will find it difficult to gain the hours as many of the Types of Learning will not be available to them readily.

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

Response: See response 3a.

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 - again , for people not directly involved, the ability to achive the number of hours (particularly when the claimable hours are limited), would be difficult and potentially at some cost to the certificate holder. Many available seminars do have entry/registration costs.

b) over five years? - response. May be achievable considering above responses

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

Response: No - See above responses

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

Response: Yes

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

Response: