

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?

Yes, and the Board may be aware that the proposed MOC scheme is generally consistent with The Institute of Quarrying Australia's Quarry Management Certification System (QMCS) requirement for Ongoing Professional Development.

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

Yes, the areas of competence and topics provide an adequate range of relevant choices for quarry managers.

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

Yes, the types of formal and informal learning listed should be accessible by quarry managers, provided there is flexibility in the minimum annual hours required, within the five (5) year total of 120 hours.

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

Yes, a reasonable level of formal learning should be required and the 66% of formal learning should be achievable over a five (5) year cycle.

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) The proposed 24 hours per year minimum for Quarry Managers is effectively the same as their 120 hour minimum for 5 years. This does not allow for variations in the circumstances of an individual and so I believe that the annual minimum should be less. If a 12 hours minimum per year was allowed for this would allow for varied circumstances.

b) The proposed 120 hour minimum over five years is considered a reasonable requirement but should be required as a rolling aggregate.

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

Yes, they are reasonable and practical except that I recommend that the 120 hour total should be an aggregate over five (5) years with an annual minimum of 12 hours.

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

Yes, the record keeping requirements are reasonable and practical. The Board may be aware that the IQA provides a system for industry personnel to record their Ongoing Professional Development (Maintenance of Competence) as part of their QMCS.

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

Yes, they appear adequate and are not onerous. Will third party governance processes carried out by organisations such as the IQA, as part of their QMCS, be taken into account or replace the Departments need to carry out audits?