

Submissions for New Zealand Mining Board of Examiners CPD review

If you would like to make a submission, please email a word version of the CPD Review Submission Form or any other additional feedback to: BoE_Secretariat@worksafe.govt.nz

The closing date to make a submission is 9 am Monday 1 July 2019.

Please use this submission form to provide a response to the Board on the proposed changes to the CPD Framework. You do not need to provide a response in all sections – just the ones for which you have comments.

Please complete the following section first.

Individuals

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|---------------|
| Name |
| Email: |
| Phone number: |

Organisations

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|----------------------------------------------------------|
| Organisation: MinEx – Health & Safety Council |
| Name of submitters: Wayne Scott |
| Positions: Chief Executive Officer |
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Please provide any comments or feedback you have in the boxes below. You can comment on any or all of the changes. The Board is committed to reviewing all feedback and taking it into account in deciding on the most appropriate recommendations to make to WorkSafe.

Any topics outside of the proposed changes are out of the scope of this review, and will not be considered in this review process.

| ISSUE | PROPOSAL |
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| 1. The annual requirement for CPD hours did not allow CoC holders enough flexibility to manage their CPD to suit their needs and circumstances. | <ul style="list-style-type: none"> – Do you believe the removal of annual CPD requirements will provide the right amount of flexibility to a CoC holder to manage their CPD requirements? – Is there anything else the Board could consider that will maintain a robust CPD system but provide flexibility needed? – Is there a disadvantage to removing the annual requirements for CPD? <p>We agree that the removal of annual CPD requirements will provide the right amount of flexibility to CoC holders to manage their CPD requirements.</p> <p>We do not however see value in retaining the split between formal and informal hours. The new category of formal training, “Verifiable participation in any other activity within the competencies where new knowledge and/or skills relevant to the CoC have been learnt or enhanced” effectively covers informal training and therefore we would like to see all hours counted as formal.</p> |

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| <p>2. Underground coal mine CoC CPD requirements are the only requirements which require specialist training outside of the four competencies. The Board now believes the additional specialist competencies for the underground coal mine CoCs are onerous and unduly restrictive given the standard competency requirements are relevant to the underground coal mine CoCs and broadly address the topics included in the specialist competencies.</p> | <ul style="list-style-type: none"> - What are the implications, positive and negative, short and long term, of the removal of requirement for specialist training for first class coal mine manager, coal mine underviewer and coal mine deputy? - If you believe there should be additional requirements for the underground coal mine CoCs are the ones prescribed suitable or can you suggest any alternatives? <p>We support the removal of specialist competencies for the underground coal mine CoCs.</p> |
| <p>3. Some CPD activities that provide significant benefits and key learnings to the CoC holder are allocated to informal learning but would be more suitable for formal learning.</p> | <ul style="list-style-type: none"> - Have the right CPD activities been proposed to have their allocation changed from informal to formal? - Are there any other CPD activities that could have a change in allocation from informal to formal? - Are there any disadvantages of changing these CPD activities from informal to formal learning? <p>We do support the proposed changes, but do not see value in retaining the split between formal and informal hours. The new category of formal training, "Verifiable participation in any other activity within the competencies where new knowledge and/or skills relevant to the CoC have been learnt or enhanced" effectively covers topics that were previously defined as informal training and therefore we would like to see all hours counted as formal.</p> |

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| <p>4. The claimable hours for some CPD activities do not accurately reflect the contribution and value of voluntary work within the profession and the significant key learnings that can arise from participation in these voluntary activities nor recognise the activity can be a day long event.</p> | <ul style="list-style-type: none"> - Have the right CPD activities had their claimable hours increased to recognise the value of the activity to the CoC holder to their professional development? - Do you agree with the level of increase? - Should any of the other activities have an increase or decrease in their claimable hours? <p>We support the level of increase being proposed for claimable hours.</p> |
| <p>5. There is not an 'other' activity category for CoC holders that may have completed a CPD activity with key learnings that does not fit into the current available CPD activities. The CPD activities do not reflect more modern ways of accessing valuable CPD such as podcasts. The value of a structured field trip is not recognised for formal learning.</p> | <ul style="list-style-type: none"> - Does the addition of the new activities in the formal and informal learning categories meet the future needs of CoC holders and provide the flexibility for CoC holders to manage their CPD? - Are there any other new activities that could be included? <p>We do not see value in retaining the split between formal and informal hours. The new category of formal training, "Verifiable participation in any other activity within the competencies where new knowledge and/or skills relevant to the CoC have been learnt or enhanced" effectively covers topics that were previously defined as informal training and therefore we would like to see all hours counted as formal.</p> <p>This will avoid confusion between informal and formal hours and will give the CoC holder the flexibility to tailor CPD hours to their training needs without the burden of determining whether they are formal or informal learning.</p> |

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| <p>6. Wording in some of the descriptions could be improved to be clearer.</p> | <p>Are there any other minor changes in the wording in description of some activities in formal and informal learning categories that would provide clarification?</p> <p>We do not see any value in retaining the distinction between formal and informal learning and therefore wording clarification is not needed.</p> |

CPD requirements for manager to manage the quarry operation specified in the certificate

Considering the CoC for managers to manage the quarry operation specified in the certificate is for very low risk quarries only are the proposed CPD requirements suitable?

We support the proposed requirement for 30 hours CPD over 5 years for a manager to manage the quarry operation specified in the certificate.

Transitional arrangements

- From the summaries above what would be the fairest transitional arrangements for CoC holders?
- How could 'genuine attempt at completing CPD' be measured?
- Do you have any suggestions for what 'allowances made' could look like for a non compliant CoC holder that has made a genuine attempt at completing CPD?
- Should a CoC holder non-compliant with the CPD requirements be required to catch up on their outstanding CPD requirements before their CoC is next renewed?
- Should a CoC holder non-compliant with the CPD requirements be able to catch up on their outstanding CPD requirements after their CoC is next renewed?
- Do you have any other suggestions for transitional arrangements?

We believe that CoC holders should be allowed to "catch up" additional CPD hours required within their existing 5 year period, utilizing the revised CPD rules. If a CoC holder cannot do this due to the short time frame until renewal, there should be an application process so that the BOE can determine whether the CoC holder has made a genuine attempt to complete the CPD hours requirement. When considering whether a genuine attempt has been made the BOE should consider:

- 1) **Whether the shortfall was only in the earlier years of the CoC's 5 year term.**
- 2) **Why the shortfall occurred e.g lack of available CPD training, illness, travel etc.**
- 3) **Whether the CoC holder has completed the required hours in their last year.**
- 4) **What genuine attempt has been made to meet requirements.**

Any other comments in regards to the proposed changes?

Given the proposed changes, and those included in this submission, we believe that Criteria for CPD formal training courses is no longer required as there should be no distinction between formal learning and formal training courses. This is both confusing and unnecessary. These criteria are in Appendix 1 of the Continuing Professional Development Guidelines for Extractives, and should be removed.

Use and release of information

All or any part of any written submission (including names of submitters) may be published on WorkSafe's website: worksafe.govt.nz

Unless you clearly specify otherwise in your submission, WorkSafe will consider that you have consented to website posting of both your submission and your name.

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