

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

Name:
Email:
Phone number:

Organisations

Organisation:
Name of submitters:
Positions:
Email:
Phone number:

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
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?

ISSUE	PROPOSAL
<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>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?

ISSUE	PROPOSAL
<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>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?

ISSUE	PROPOSAL
<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>

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?

[Empty response area for the question regarding CPD requirements suitability]

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?

Any other comments in regards to the proposed changes?

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](https://www.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.

Contents of submissions may be released to the public under the Official Information Act 1982 following request to WorkSafe (including via email). Please advise if you have any objection to the release of information contained in a submission, including commercially sensitive, and in particular which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this document under the Official Information Act.

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I do not wish all or any part of my submission to be posted on the WorkSafe website for the following reasons:

I do not consent to my name being posted on the WorkSafe website Yes No

I would not like the following details released in an official information act request for the following reasons: