

Continuing professional development review consultation

*NEW ZEALAND MINING
BOARD OF EXAMINERS*

May 2019



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Introduction

The New Zealand Mining Board of Examiners' role is to ensure safety for the mining, quarrying and tunnelling industry by advising WorkSafe New Zealand on setting minimum competency and professional development standards, and making sure these are maintained.

Competency certification and continuing professional development (CPD) makes mining, tunnelling and quarrying safer. CPD is the continual maintenance, improvement and broadening of knowledge, understanding and skills as well as the development of personal qualities Certificate of Competence (CoC) holders need at work.

Everybody in a safety critical role in mining, quarrying and tunnelling must have a current CoC. It is the CoC holder's responsibility to undertake CPD and then to apply the knowledge, understanding and skills gained through the CPD activity in their safety critical roles at an extractives site.

Regulations require CoCs to be renewed every five years. To get their CoCs renewed, holders are required to provide evidence of completion of their CPD requirements.

As the issuer of CoCs the Board must not only have thorough knowledge of CPD requirements but also confidence that the requirements will assist CoC holders in maintaining, improving and broadening knowledge and skills. The Board is responsible for assessing whether CPD requirements are met when renewing CoCs. It can also cancel and suspend CoCs.

Development and review of Certificates of Competence (CoC) and Continuing Professional Development (CPD) regime

The development of continuing professional development (CPD) was an important part of the response to the Royal Commission on the Pike River Coal Mine Tragedy which noted that 'the competencies of mine workers are central to managing hazards, and a suitably trained workforce is one of the first lines of defence against major accident.'

The requirement for CPD for the extractives industry was a world first with a number of unique features including that:

- the regulator (WorkSafe) not only sets but also administers the CPD requirements
- the requirements are based on safety critical statutory roles of CoC holders rather than on a profession.
- the CPD requirements are for an industry whose participants have a wide range of educational achievement

The Board had a very tight legislated deadline of 1 January 2016 to introduce CPD requirements. The Board undertook extensive research and consultation with industry on CPD requirements prior to introduction but there was no opportunity to test, pilot or gradually introduce these requirements.

WorkSafe and the Board recognised the concept of CPD was new to the extractives industry and stated that after a period of embedding and settling in a review of the CPD Requirements would be required to ensure it was fair and reasonable and fit for purpose.

The Board has now reviewed the Continuing Professional Development (CPD) requirements as part of its responsibility under the Health and Safety at Work Act 2015.

Have your say

The Board wants your feedback on the proposed changes before making its recommendation to WorkSafe. It is also seeking industry feedback/suggestions on potential transitional arrangements for any changes.

This document sets out the changes to the CPD requirements the Board proposes to make as a recommendation to WorkSafe.

You are encouraged to make a submission in response to some or all of the proposed changes. At the end of this document is a CPD Review submission form. Please make your submission by emailing a word version of the CPD Review submission form to: BoE_Secretariat@worksafe.govt.nz

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

The Board will also be hosting a series of consultation workshops. This will give you the opportunity to hear a more detailed presentation on the proposed changes, participate in discussion and talk with Board members and Secretariat staff.

Timing of CPD requirements changes

Timing for when any changes to CPD requirements could be implemented is unclear as this depends on the consultation's outcome. The Board and WorkSafe will work to ensure that any CPD changes will be implemented as soon as practicable.

An implementation review is currently being conducted by the Ministry of Business, Innovation and Employment (MBIE) of the Health and Safety at Work (Mining Operations and Quarrying Operations) Regulations 2016. There may be some changes implemented that could affect some CPD requirements. A decision on how to proceed will be made at the time but a targeted consultation with affected parties may be conducted.

Proposed changes to the CPD requirements

The Board is considering the following issues and proposals:

	ISSUE	PROPOSAL
1.	<p>The annual requirement for CPD hours did not allow CoC holders enough flexibility to manage their CPD to suit their needs and circumstances.</p>	<p>Remove the requirement for minimum annual CPD hours. The CoC holder will have the entire 5 year renewal period to complete the required CPD hours with all the following conditions:</p> <ul style="list-style-type: none"> - the five year total CPD hours requirement must be split between a minimum of two-thirds formal and a maximum one-thirds informal learning (eg a B grade quarry manager who is required to complete 60 hours over 5 years, could do 40 hours formal learning and 20 hours informal learning over 5 years) - a minimum of six hours formal learning for each competency¹ must be completed within the 5 years - no more than one-third of the five year CPD hours required can be completed in one year (eg a B grade quarry manager who is required to complete 60 hours could do no more than 20 hours in one year) - there cannot be more than a two year break from completing CPD over the five years - CPD hours cannot be carried over from one five year renewal period to another. Note: This will effectively remove any carry over ability as there will be no need to 'carry over' hours within the five year renewal period. <p>This will allow CoC holders the flexibility to manage their CPD requirements taking into account their individual circumstances. CoC holders will be able to take part in CPD that provides the best development and growth for them when it is available and have career breaks without an impact on their CoC. This will remove the need to undertake CPD activities for compliance sake to meet the annual requirements.</p>
2.	<p>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>	<p>Remove the requirement for specialist training for first class coal mine manager, coal mine underviewer and coal mine deputy.</p>
3.	<p>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>	<p>Change the following CPD activities from informal learning to formal learning:</p> <ul style="list-style-type: none"> - participation in high-level risk assessments - participation in conducting reportable incident investigations.
4.	<p>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 a CPD activity can be a day long event. Addressing this will ensure the number of hours attributed to the activity are a more accurate representation of the skill and knowledge gained.</p>	<p>Increase the claimable hours allowed for the following activities:</p> <ul style="list-style-type: none"> - attending industry representative meetings, such as but not limited to advisory groups, industry and specialist boards, panel of examiners membership, technical committees - attending industry seminars/workshops, such as those run by industry or related organisations.

¹ There are four competencies: Operating and Safety Systems, Legislation, Emergency Management, and Leadership.

	ISSUE	PROPOSAL
5.	There is not an 'other' activity category for CoC holders who may have completed a CPD activity with key learnings that does not fit into the currently available CPD activity categories. The current CPD categories do not recognise more modern ways of accessing valuable CPD such as podcasts. The value of a structured field trip is not recognised for formal learning.	Add the following new CPD activities: <ul style="list-style-type: none"> - 'other' activity to formal and informal learning - podcasts to informal learning - structured field trips to formal learning.
6.	Wording in some of the descriptions could be improved to be clearer.	Make minor changes in wording to provide clarification.

The Board is also using this opportunity to propose CPD requirements for the holder of a CoC as a manager of a quarrying operation specified in the certificate.

The following tables set out:

- the current and proposed CPD requirements for each CoC, and
- the proposed changes to formal and informal learning categories and claimable hours for activities.

Current and proposed requirements

	PROPOSED	CURRENT
Site Senior Executive (SSE)		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
First Class Mine Manager		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
First Class Coal Mine Manager		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency In addition , a total of 30 hours over 5 years across all of the following topics from Operating and Safety Systems: electrical engineering, ventilation management, gas management, spontaneous combustion, flammable dust management

	PROPOSED	CURRENT
A Grade Opencast Coal		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
B Grade Opencast Coal		
Hours required	5 year total: 60 hours	5 year total: 60 hours 12 hours per year minimum
Learning	Formal: minimum of 40 hours per 5 years Informal: up to a maximum of 20 hours per 5 years	Formal: minimum of 8 hours per year Informal: up to a maximum of 4 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 8 hours over 5 years for each competency
A Grade Quarry Manager		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
B Grade Quarry Manager		
Hours required	5 year total: 60 hours	5 year total: 60 hours 12 hours per year minimum
Learning	Formal: minimum of 40 hours per 5 years Informal: up to a maximum of 20 hours per 5 years	Formal: minimum of 8 hours per year Informal: up to a maximum of 4 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 8 hours over 5 years for each competency
A Grade Tunnel Manager		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
B Grade Tunnel Manager		
Hours required	5 year total: 60 hours	5 year total: 60 hours 12 hours per year minimum
Learning	Formal: minimum of 40 hours per 5 years Informal: up to a maximum of 20 hours per 5 years	Formal: minimum of 8 hours per year Informal: up to a maximum of 4 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 8 hours over 5 years for each competency

	PROPOSED	CURRENT
Coal Mine Underviewer		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency	Minimum of 16 hours over 5 years for each competency
Coal Mine Deputy		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be earned from topics that are directly subject-related to the area of specialisation	Minimum of 5 hours over 5 years for each competency In addition , a total of 15 hours over 5 years across all of the following topics from Operating and Safety Systems: electrical engineering, ventilation management, gas management, spontaneous combustion, flammable dust management
Electrical Superintendent		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be spent on topics that are directly subject-related to the area of specialisation	Minimum of 16 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be earned from topics that are directly subject-related to the area of specialisation
Mechanical Superintendent		
Hours required	5 year total: 120 hours	5 year total: 120 hours 24 hours per year minimum
Learning	Formal: minimum of 80 hours per 5 years Informal: up to a maximum of 40 hours per 5 years	Formal: minimum of 16 hours per year Informal: up to a maximum of 8 hours per year
Competencies	Minimum of 6 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be spent on topics that are directly subject-related to the area of specialisation	Minimum of 16 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be earned from topics that are directly subject-related to the area of specialisation

	PROPOSED	CURRENT
Mine Surveyor		
Hours required	5 year total: 60 hours	5 year total: 60 hours 24 hours per year minimum
Learning	Formal: minimum of 40 hours per 5 years Informal: up to a maximum of 20 hours per 5 years	Formal: minimum of 8 hours per year Informal: up to a maximum of 4 hours per year
Competencies	Operating and Safety Systems and Legislation only. Minimum of 6 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be earned from topics that are directly subject-related to the area of specialisation	Operating and Safety Systems and Legislation only. Minimum of 8 hours formal learning over 5 years for each competency A minimum of 25% of total hours required must be earned from topics that are directly subject-related to the area of specialisation
Winding Engine Driver		
Hours required	5 year total: 40 hours 8 hours per year minimum	5 year total: 40 hours 8 hours per year minimum
Learning	Formal: minimum of 27 hours per 5 years Informal: up to a maximum of 13 hours per 5 years	Formal: minimum of 4 hours per year Informal: up to a maximum of 2 hours per year
Competencies	A minimum of 30 hours over 5 years must encompass relevant topics from Operating and Safety Systems. Up to 10 hours may be from topics from other competencies	A minimum of 30 hours over 5 years must encompass relevant topics from Operating and Safety Systems Up to 10 hours may be from topics from other competencies

Formal learning

PROPOSED CHANGE TO TYPES OF LEARNING	CURRENT TYPES OF LEARNING	PROPOSED CHANGE TO CLAIMABLE HOURS	CURRENT CLAIMABLE HOURS
No change	Attending industry seminars/workshops, such as those run by industry or related organisations	Actual hours up to a maximum of 8 hours per seminar/workshop	Actual hours up to a maximum of 6 hours per seminar/workshop
Delivering industry seminars/workshops/trainings	Delivering industry seminars/workshops	No change	Actual hours up to a maximum of 8 hours per seminar/workshop
No change	Successfully completing formal training courses by fulfilling all course requirements. These must meet the criteria set out in Appendix 2	No change	Actual hours
No change	Attending industry representative meetings, such as but not confined to advisory groups, industry or specialist boards, panels of examiners membership, technical committees	Actual hours up to a maximum of 10 hours per year for each group	Actual hours up to a maximum of 6 hours per year for each group
No change	Attending relevant industry conferences. These must be relevant to the certificate of competence holder	No change	Actual hours up to a maximum of 4 hours per conference. This is in addition to the hours claimed for attendance at conference workshops

PROPOSED CHANGE TO TYPES OF LEARNING	CURRENT TYPES OF LEARNING	PROPOSED CHANGE TO CLAIMABLE HOURS	CURRENT CLAIMABLE HOURS
Undertaking study or training towards tertiary qualifications, including degrees and industry training qualifications	Study or training towards tertiary qualifications, including degrees and industry training qualifications	No change	Half of the required formal hours per year, that is: <ul style="list-style-type: none"> - 8 hours for most certificate of competence holders - 4 hours for holders of the following certificates of competence: B-grade opencast coal mine manager - B-grade quarry manager, B-grade tunnel manager, coal mine deputy, mine surveyor - 2 hours for holders of a certificate of competence as a winding engine driver
No change	Presenting paper at a relevant industry conference (includes content preparation)	No change	Actual hours up to a maximum of 8 hours for each presentation Actual hours up to a maximum of 4 hours where the same content of a paper is subsequently presented or a previously published paper is presented
No change	Publication of learned/peer reviewed papers	No change	Actual hours up to a maximum of 10 hours for papers that have not been presented Actual hours up to a maximum of 5 hours for content/paper that has been previously presented at a conference or similar Extra hours are not claimable if the paper is published in more than one publication
No change	Publication of articles in relevant industry magazines or journals or similar.	No change	Actual hours up to a maximum of 4 hours for content that has not previously been presented Actual hours up to a maximum of 2 hours for content/paper that has been previously presented at a conference or similar Extra hours are not claimable if the paper is published in more than one publication
No change	Written papers accompanied by a conference poster at a relevant industry conference (includes preparation)	No change	Actual hours up to a maximum of 8 hours for papers that have not been presented Actual hours up to a maximum of 4 hours for papers that have been previously presented at a conference or similar
Move from informal to formal. Organised structured field trips with specified learning outcomes.	Relevant field trips	Move from informal to formal. Actual hours up to a maximum of 4 hours per field trip, and a maximum of 2 field trips per year	Actual hours up to a maximum of 2 hours per field trip, and a maximum of 2 field trips per year

PROPOSED CHANGE TO TYPES OF LEARNING	CURRENT TYPES OF LEARNING	PROPOSED CHANGE TO CLAIMABLE HOURS	CURRENT CLAIMABLE HOURS
Move from informal to formal Participation in conducting notifiable or reportable incident investigation(s)	Participation in conducting reportable incident investigation(s)	Move from informal to formal Actual hours up to a maximum of 4 hours per year	Actual hours up to a maximum of 2 hours per year
Move from informal to formal	Participation in high-level risk assessments and the resulting development, review or change of any relevant health and safety management plan documents. This does not include participation in day-to day activities such as task focused risk assessment (eg Take 5 or JSA).	Move from informal to formal. Actual hours up to a maximum of 8 hours per year	Actual hours up to a maximum of 2 hours per year
Verifiable participation in any other activity within the competencies where new knowledge and/ or skills relevant to the CoC have been learnt or enhanced	New addition to the table	Actual hours up to a maximum of 8 hours per year	New addition to the table

Informal learning

PROPOSED CHANGE TO TYPES OF LEARNING	CURRENT TYPES OF LEARNING	PROPOSED CHANGE TO CLAIMABLE HOURS	CURRENT CLAIMABLE HOURS
No change	Publications. This can include but not be confined to reading learned or technical articles, technical publications, conference papers	No change	Actual hours up to a maximum of 2 hours per year
Move from informal to formal. Organised structured field trips with specified learning outcomes	Relevant field trips	Move from informal to formal. Actual hours up to a maximum of 4 hours per field trip, and a maximum of 2 field trips per year	Actual hours up to a maximum of 2 hours per field trip, and a maximum of 2 field trips per year
No change	Delivering in-house training (that is not formal training)	No change	Actual hours up to a maximum of 4 hours per year
No change	In-house training (that is not formal training)	No change	Actual hours up to a maximum of 4 hours per year
No change	Equipment manufacturers' training (that is not formal training)	No change	Actual hours up to a maximum of 4 hours per year
No change	Attending relevant industry expos	No change	Actual hours up to a maximum of 2 hours per year

PROPOSED CHANGE TO TYPES OF LEARNING	CURRENT TYPES OF LEARNING	PROPOSED CHANGE TO CLAIMABLE HOURS	CURRENT CLAIMABLE HOURS
No change	Workplace mentoring	No change	Actual hours up to a maximum of 2 hours per year
Move from informal table to formal table	Participation in high-level risk assessments. This does not include participation in day-to-day activities such as task-focused risk assessment (eg Take 5 or JSA)	Move from informal table to formal table Actual hours up to a maximum of 8 hours per year	Actual hours up to a maximum of 2 hours per year
No change	Review of principal hazard management plans	No change	Actual hours up to a maximum of 2 hours per year
Move from informal to formal Participation in conducting notifiable or reportable incident investigation(s)	Participation in conducting reportable incident investigation(s)	Move from informal to formal Actual hours up to a maximum of 4 hours per year	Actual hours up to a maximum of 2 hours per year
Listening to relevant podcasts	New addition to informal learning	Actual hours up to a maximum of 4 hours per year	New addition to informal learning
Verifiable participation in any other activity within the competencies where new knowledge and/or skills relevant to the CoC have been learnt	New addition to informal learning	Actual hours up to a maximum of 8 hours per activity	New addition to informal learning

Transition arrangements

The idea of CPD was new to the extractives industry and was introduced within very tight deadlines. It was therefore recognised at the outset that the CPD requirements would have to be reviewed after a period of embedding and settling in to ensure they were fit for purpose and reasonable.

As a new idea, it has taken some CoC holders a while to understand their CPD requirements and fully appreciate the requirement to comply with them. Consequently there may be a number of CoC holders who have not met their annual CPD requirements and therefore will not be able to renew their CoC under the current regime.

Removing the requirement for annual minimum hours is proposed by the Board. This will allow the flexibility for a CoC holder to manage their CoC hours by taking into account :

- their personal circumstances
- availability of the most suitable CPD.

The Board proposes that, when the new CPD requirements come into force, they should apply to every person issued with a new CoC as well as those who already hold CoCs. This would mean that a person who holds a CoC on the date the new CPD requirements come into force will be able to take advantage of any flexibility the Board introduces, rather than having to continue complying with the old CPD requirements.

The Board wishes to seek industry and other potentially interested parties views on transitioning those CoC holders who have not complied with the current CPD requirements to the new regime and, in particular, whether there should be any limitations (transitional requirements) on their eligibility to do so:

- Should a CoC holder non-compliant with the CPD requirements be required to meet a transitional requirement criteria (yet to be determined) in order to be eligible to transition into the new regime?
- 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?

Potential options

NO TRANSITIONAL ARRANGEMENTS

The new CPD requirements take effect on a specified date and apply to every CoC holder, including non-compliant CoC holders. There are no special provisions to transition non-compliant CoC holders to the new regime after that date. If a non-compliant CoC holder can complete their outstanding CPD hours without doing more than a third of their total CPD requirements in any one year, they will meet the new CPD requirements and thus be able to renew their CPD just like anyone else. If they would need to do more than a third of their total CPD requirements in any one year to complete their outstanding CPD hours, then they will not be able to renew their CoC.

CPD HOURS CATCH UP BEFORE RENEWAL

The new CPD requirements take effect on a specified date and allowances are made for those CoC holders non-compliant with the CPD requirements, which have made a genuine attempt at completing their CPD, to catch up on their CPD requirements before their CoC is renewed.

CPD HOURS CATCH UP AFTER RENEWAL

The new CPD requirements take effect on a specified date and allowances are made for those CoC holders non-compliant with the CPD requirements, which have made a genuine attempt at completing their CPD, to catch up and meet all of the requirements, after their CoC is renewed.

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

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.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies including, WorkSafe. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to WorkSafe in the course of making a submission will be used by WorkSafe only in relation to matters covered by this document. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that WorkSafe may publish.

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:

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