

NAME Robin Hopps Organisations TAFE and Pegasus Training as suppliers of OCE Courses

The comments and opinions here are my own and not those of the organisations mentioned.

I have spent 20 years training OCEs. I am also well experienced as a Mine Manager and in training same as well as coming from an UG coal background and have trained deputies.

Here are my comments on the proposed MOC scheme

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

**As a general principle I though the concept of hours of training being evidence of competency was long ago abandoned to be replaced by having to pass an assessment to prove competency. Hours of attendance is no indicator of competency and yet you scheme can be achieved without any assessment being carried out.**

There is no indication of the hours required for each of the four areas of competence and leadership has not to date been a mandatory component of courses. That is not to say it is not important however I understand that over time companies have considered that matter to be for them to provide training in and as such it will differ across companies

You have not detailed the hours per competency unit merely that 33% can be informal and 66% formal

The definition of formal training is far too vague. Formal training must be training designed to meet the requirements for MOC and as such should involve assessment.

I cannot agree that managers should get 120 hours and deputies/ OCE only 60 hours of MOC training. Contrary to popular view it is not the manager who is seen as dictating safety etc \_ For the majority of workers their leader is the shift supervisor. His attitude epitomises what the employee sees as the company's attitude towards safety and overrides what MMEs may say as the supervisor is their leader full time compared to the hours an MME may spend addressing the workers.

At 6.1.3 Learning Hours it refers to Appendix A requirements but Appendix A is not about that matter. I presume you are referring to Appendix B.

All the requirements of Appendix B can simply be avoided by having 3hr sessions of formal learning hence rendering all the requirements optional only. Just six 3hr sessions would meet all formal training requirements each year for your scheme.

The final requirement of Appendix B talks about having to have passed assessment but only for formal training courses of 4hrs. As previous this requirement is easily avoided by having all training less than 4 hours this meaning applicants can achieve all your MOC requirements without having to do any assessment.

The requirements for trainers can also be avoided by -4hr sessions.

It seems odd to have so many rules about who gives the training yet have a scheme that can avoid any form of assessment.

Put simply Appendix B enables MOC training to be delivered by anyone with no need for any

assessment. In the words of J McEnroe "you cannot be serious"

The requirements of Appendix B should be applied to ALL formal training regardless of duration otherwise the MOC scheme will have no credibility.

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

You have not designated the hours either by competency or topic. Topics range from 37 items in operating practices to two in legislation. You also talk about areas but these are not defined. What stops someone from doing all their operating areas hours in say, shot firing because they are doing drill and Blast supervisors role. The topics need to be reduced or defined for each role and hours suggested otherwise there will be no consistency with what constitutes MOC.

It would be more logical to align the topics with the competency elements that form the basic competencies for each of the statutory certificate levels with appropriate modifications

I presume Table 2 to be Figure2 ?

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

Section 8 only requires that the subject matter covers the four competencies rather than the multitude of topics meaning you may do the time and not actually cover in any meaningful way the topics.

Other comments here would be that attending (and even presenting papers) courses does not mean anything meaningful was learned. What means do you propose for ensuring that learning has occurred?

Formal training must be training designed to meet the requirements for MOC and probably should be approved by the Competency Board. There is nothing here that stops companies or other coming up with training that meets your guidelines but is not effective MOC

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

Little comment on this except these comments on the basic principles.

There is no provision in your scheme for on the job time (or actual carrying out the role) at a mine.

This leads to a ludicrous situation where being employed in the role over five years counts for nothing but 12 hours of training each year for someone not practising is all that is required to maintain competence! This is a major fault with most schemes- it is illogical when the problem stems from persons having tickets and not practising and thus becoming out of date and yet there is no provision that continued employment in the role counts for anything at all. There is no doubt that continued practice of the actual role inevitably brings ongoing experience and training with it. From experience it is hard not to keep up to date in statutory roles with the amount of material coming across one's desk. A start point would be that continuing experience in the role over the five should be up to half the qualifying requirement.

This time in the role could be considered informal training if you like and 33% could be a good start off point. However, candidates claiming this would need to detail what new knowledge they have acquired over this time

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

b) over five years?

You have not specified the hours per competency or topic

How is it that an UG supervisor of a non-coal mine (with usually less onerous requirements in terms of ground support and gas management and sophistication) requires 120 hours per 5 years compared to an UG coal mine deputy needing 60 hours?? Other comments as above – They should all require 120 hours and of course as above I think they all should get 120 hours anyway but some should come from carrying out the role.

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

With regards 10d you need to specify the topics and times for each level at a minimum to ensure some consistency

Your final paragraph "Persons who do not satisfy the requirements of the MOC scheme must undertake and pass the written and oral examinations for the relevant certificate of competence required for the practising certificate, before their practising certificate will be renewed." is totally inconsistent with the MOC scheme you have produced. The formal and onerous requirements of the examination process are in stark contrast to what you are proposing – a scheme with no formal assessment of whether anything has been learnt about a range of topics you can choose yourself. The hours involved in the exam far outweigh any hours you have deemed necessary to maintain competence. As a shock tactic to get persons to adopt your scheme it could well work, whether it maintains competency is another matter

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

With regards Section 11 I note that WHSMR CI 143 calls for the successful completion of training for Practising Certificates but you have not designated what that is, presumably it is not simply attendance at training which you have listed. Success in completing an appropriate assessment would be consistent with current national standards in this area.

I presume all PC applicants would have to provide evidence of competency as per the regulations to renew a certificate so am mystified at points 4 and 5 in Section 11. I would have thought every applicant for renewal would have their evidence checked/audited? Is it intended to automatically pass 95% of applicants and only check 5%. Surely this cannot be so?

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

Yes, if each applicant must supply evidence to get the renewal (and Section 11 leaves me with some doubts about that) and assuming the requirements are tightened sufficiently in regards

times per topic.

## OTHER COMMENTS

There exists a disparity with how different statutory officials have been trained in the past.

It is my understanding that up to 1984 open cut officials received a certificate of competency after an interview with an inspector thus receiving no formal but only on the job training. There are still some with these old tickets. About 190 OCE tickets were issued to incumbents in 1984

From 1984 to 2003 technical training was predominantly given at TAFE College courses and a pass mark was required to sit the statutory exams. In this OCE time tickets issued reached about 460 so about 310 had reasonable technical training

From 2003 to date over 400 candidates have passed the Cert 4 OCE course where the 14 or so modules have had to be obtained under national assessment guidelines.

In this period there have been numerous changes in all applicable legislation and many OCEs seem to have less understanding of the newer legislation. ○

The above matters warrant serious consideration if we are trying to bring everyone up to the same standard of competency we expect today so the first round of MOC/ updating should provide for these matters in some way although not having to do the current modules in full. A legislation update should be mandatory for all candidates except the last exam.

The CPD scheme devised by the MMAA is I think superior to what is proposed albeit without any assessment being required and somewhat aligns with the open cut electrical and mechanical engineer's requirements.

As an aside I think all interstate persons seeking mutual recognition should be required to have an understanding of NSW legislation

Those who qualified prior to 2003 should receive some training in the modules current candidates must do.

In formulating a scheme, I think part of it should mandate review of serious accidents/fatalities, and safety alerts across the industry in the previous five years ○

As a summary I think the scheme needs to credit time in the role, the guidelines on topics need far more definition and hours needed, there needs to be significant effort to improve understanding of legislation, there must be assessment of all formal learning regardless of time duration to help the scheme meet its goals and avoid organisations providing training to meet minimal requirements and not achieve maintenance of competency