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Date: 14/01/2018 10:57 PM
Subject: Consultation submission - Changes to VEET mandatory safety training requirements

Hello, this is my response to the consultation paper, before responding to the questions, I have two issues that I think are related and relevant but not mentioned much in the paper

- with one or more superseded units completed in the past and 1+ years field experience the RTO's are likely to credit the new units on RPL basis. If so, this would miss the point of keeping installer updated with any new training material, so unless ESC requests all RTOs that the units cannot be credited through RPL, there is very little point to make the changes

- veet is a complicated legislation and has many rules, regulations and compliance requirements, and yet no one is really officially obliged to know them. There is no veet training or tests of competence, I know MST is about safety but safety is about managing risks and insufficient knowledge of veet means high risk of compliance abuse. So I believe every AP and installer should pass some sort of test, periodically, to demonstrate they are up to date with current rules. The result don't need to have consequences, just doing the test will force the participants to be up to date. I use multiple choice tests as refreshers of the knowledge, and it works quite well. Installers should do it for obvious reasons, and AP's because they are ultimately responsible for what happens in their business.

And now the consultation questions

1. Do you believe this proposed requirement is needed? Please provide a rationale for your answer.
2. What are the potential impacts for your organisation of implementing this proposed requirement? What are the potential benefits for your organisation of implementing this proposed requirement?
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4. What are the potential impacts for your organisation of implementing
What are the potential benefits for your organisation of implementing this proposed requirement?
5. How would this proposed requirement affect your safety risk management and mitigation strategies?
6. Do you believe this proposed requirement is needed? Please provide a rationale for your answer.
7. What are the potential impacts for your organisation of implementing this proposed requirement? What are the potential benefits for your organisation of implementing this proposed requirement?

and answers

1. Yes, people with good knowledge of their work and risks involved are less likely to have accidents and are less likely to abuse the system

- 2a. I use licensed electricians so no impact. I also install every now and then myself which if I choose not to update my qualifications I won't be able to do but the impact will be minimal.
- 2b. No direct benefits that I can see except making the system more robust and weeding out weak links which has to be good for everyone in the long run
3. I don't think it should be required for activity 21. Licensed electricians use ladders but are deemed to satisfy the requirement, non-electricians don't really carry ladders to go 2m up or over, because they are profit based and there is no profit if you have to move large ladder around, so they are more likely to skip lights with any height or other issues. Ceiling insulation is a different story though and there, imho, the requirement is definitely needed.
4. Same as 2a & 2b
5. The risk management procedures don't seem to depend on the learning process but the fact that the knowledge is sufficient to handle the risk. This is usually outlined in installation manuals so the impact would be for the office staff to keep the procedures up to date and installers informed and if the proposals are put in place, making sure everyone has up to date training certification
6. If any of the 1 or 2 is needed then the 3 is also needed. As long as the new training is actually done, and not credited through RPL. Allowing RPL would make the whole exercise pointless as ppl will just get the updated piece of paper without actually learning anything new.
7. Same as 2a & 2b

best regards
Jack/Homelab