

## Submission from Ventia

Question	Response
<p>Considering Table 1, what other changes in industry practice are relevant to worker competency?</p>	<p><b>Additional Trend</b>            A potential emerging trend is that Operating companies are starting to move more towards underbalanced Well Servicing requests to prevent the need to kill a well. This potentially increases risk of exposure to harmful gases and explosive atmospheres. Whilst controllable, it is different.</p>
<p>2. What changes in industry practice need to be considered in revising the competency framework? Why are they important?</p>	<p><b>Ventia proposed the following for consideration:</b></p> <ul style="list-style-type: none"> <li>- The requirement for additional qualifications to include peripheral operations such as               <ul style="list-style-type: none"> <li>o Coil Tubing</li> <li>o Wireline</li> <li>o Cementing</li> <li>o Directional Drilling</li> <li>o Coring</li> <li>o Fishing Experts</li> <li>o Well head Maintenance Crews</li> </ul> </li> <li>- A revision of the structure of qualifications to reflect changes in the industry such as               <ul style="list-style-type: none"> <li>o Additional or alternative units of competency to reflect contemporary practices, challenges and risks e.g                   <ul style="list-style-type: none"> <li>▪ Under balanced - Well control mandatory</li> <li>▪ Ability to move 24 hrs a day &amp; quickly – NHVS, Chain of responsibility and Load restraint Chain of responsibility</li> <li>▪ High risk activities – Line of fire, Dropped objects etc.</li> </ul> </li> <li>o A move from full qualifications to skill sets where a gap analysis supports a large portion of transferable skills. E.g. Drilling crews that are required to complete a well.</li> <li>o The diversity of operations could be reflected by the structure of the qualifications required by organisations i.e. a risk based approach instead of a prescriptive approach at an industry level.</li> <li>o If a prescriptive approach remains on some level in terms of mandatory/ core units, then consideration to be given to a reduction where common units across the Qualifications with skill set pathways to differentiate them.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- When considering the cyclical nature of Drilling and Well Servicing operations, additional consideration could be given to; <ul style="list-style-type: none"> <li>○ The process and current requirement to update qualifications when there is a change to training packages stipulated in the P&amp;G Competency standard when an employee has uninterrupted currency within the industry e.g. a plumber does not become unlicensed when a new training package comes out and is not required to complete the new qualification if they have industry currency.</li> </ul> </li> </ul> <p><b>Context:</b> The practice of redoing qualifications for administrative purposes can be harmful to the credibility of the product and in some circumstances devalues it. People that are current in the industry, are typically the people at the forefront of the changes being introduced. Training packages tend to change later to reflect current industry practices. We are often in effect training people who led the changes in the first place.</p>
<p>3. Is there a need to broaden the scope of the competency framework to include all well servicing activities?</p>	<p><b>Ventia proposed the following be considered for inclusion based on interactions with the operations:</b></p> <ul style="list-style-type: none"> <li>● Coil Tubing</li> <li>● Wireline</li> <li>● Cementing</li> <li>● Directional Drilling</li> <li>● Casing crews</li> <li>● Mudlogging</li> <li>● Coring</li> <li>● Fishing Experts</li> <li>● Well head Maintenance Crews</li> <li>● Operating Company Representatives</li> </ul>
<p>What options are there for the competency framework to better reflect contemporary industry practices?</p>	<p>Industry changes quickly in terms of technology, scope of services and external factors influencing it more broadly. The flexibility to change with it would be ideal if it could be built into the competency framework rather than changing the framework each time to adapt.</p>

	<p>This suggest a more flexible framework is required. Consideration to be given to a reduction in core units to those that are common to all qualifications and a broadening of the risk-based approach taken to elective units taken that is in place now to some extent. The revised framework would essentially recognise the common and transferable skills and knowledge that exist between roles undertaken within industry e.g. Drilling, Work over, wireline, cementing etc whilst recognising formally the areas that don't through specific skill sets.</p> <p>A guiding principle should be to eliminate the requirement for people to update qualifications every time there is a change to a training package or the competency qualification framework on the basis that people who are current in the industry will be ahead of the changes being implemented. Perhaps consideration should be given to the issuing of a license that only expires if industry currency is not up to date. Overtraining for the sake of compliance to a new standard people already know reduces its value to the extent that people will seek to do the bare minimum to obtain it. This is not desirable.</p>
<p>What is the impact for operators in meeting competency requirements for workers on a drilling rig that also conducts well completion operations?</p>	<p>The impact is not extensive, but it is time consuming and there is some question as to the knowledge and skill gaps that actually exist between Drilling Operations and the completion of wells from a task, knowledge, skill and risk perspective warrants employees to hold two full qualifications.</p> <p><b>Suggestion:</b> A gap analysis be completed against the tasks, knowledge, skills and associated risks for Drilling and the completion of wells for the following purpose;</p> <ul style="list-style-type: none"> <li>• To determine whether significant skill gaps exist across all levels of qualifications that require additional training to be required. The purpose being to place the focus on these aspects as opposed to what qualification they currently sit under in the current competency framework.</li> <li>• Given the new trend of Drilling rigs being required to run initial completions and depending on the results of the gap analysis, consideration could be given to how this gap is addressed through an adjustment to the competency framework e.g. A specific skill set required to be completed in addition to the Drilling qualification to address the gaps identified to prevent the need for holding two qualifications. This would also need to be reflected in the P&amp;G competency standard.</li> </ul>

<p>Is the Competency Standard clear in setting out requirements for industry in relation to competencies needed by workers conducting drilling and well servicing operations? If not, how could these requirements be articulated more clearly?</p>	<p>The competency standard as it stands is reasonably clear as it stands to differentiate between what qualifications should be held when it comes to traditional Drilling and Well Servicing operations. The supervision requirements for when people are “In training” are more open to interpretation based on the current wording. Whilst this has been clarified verbally, the standard itself should be updated to reflect that verbal clarification to prevent future misunderstandings.</p> <p>It is not as clear where peripheral services sit within it, such as Coil Tubing, wireline etc.</p>
<p>Is the national RII framework fit for purpose?</p>	<p>It was a good starting point however as the discussion paper acknowledges, the industry has evolved and as such the framework needs to evolve with it. Refer to suggestions as per previous.</p>
<p>The regulator considers supervisors must hold the RII qualifications they are supervising, are there alternative means of demonstrating a person is competent to supervise and instruct trainees?</p>	<p>As per the current standard, the wording in the section defining a competent person who is capable of supervising someone in training as . . .” <i>A competent person has acquired through training, qualification <b>or</b> experience the knowledge and skills to carry out the task</i>”.</p> <p>The recent clarification provided by RSHQ does not recognise the experience unless the supervisor holds the qualification they are supervising essentially making the statement “or” within this definition invalid. In our opinion it seems reasonable that the experience of a Rig Manager who is current in the industry with considerable industry experience should be considered capable of supervising a leasehand new to industry whether they hold the Certificate II specifically or not.</p> <p>To reflect this position, we propose the following wording or similar be considered</p> <p><b>Training Supervision</b></p> <p>To be qualified to supervise people in training in lower-level positions in RII qualifications, those supervising will meet one of the following criteria;</p> <ul style="list-style-type: none"> <li>- Hold the lower-level qualifications they are supervising themselves</li> </ul> <p><b>OR</b></p> <ul style="list-style-type: none"> <li>- Has been verified as competent using the Contractors VOC process against the units of Roles requirements that make up the lower-level qualification by someone who holds those qualifications and</li> <li>- Has served time in the same position in an operational capacity evidence through CV or referees report</li> </ul>

	<p>It is worth noting that the wording we are proposing above forms part of the RPL process currently being undertaken to issue qualifications to those employees with industry experience and currency in order to these roles to meet the recent interpretation of the P&amp;G competency standard.</p>
<p>Do the mandated competencies adequately reflect contemporary practice for ensuring competent workers? If not, what matters should be included in a revised competency framework?</p>	<p>For the purpose of this response we are assuming this is referring to the CORE units within the qualifications framework for the RII training package and that the intent of these units is that they are considered fundamental in the duties of the role that the qualification is assigned to in the P&amp;G competency standard or they underpin the other units e.g. risk identification, permit to work etc.</p> <p>The answer to this question as to what should be mandatory is somewhat dependent on the operation itself and the requirement for these tasks within a Contractors operation.</p> <p>For this reason, we support a review of the framework to focus on alignment of core units to those that are common to all qualifications and a skill set focus that allows more of a risk-based approach to specific pathways e.g. drilling, well servicing, completions etc rather than a prescriptive approach.</p> <p>Pathways should take into consideration the skills, knowledge and tasks that are common across areas to reduce the need for duplication of qualifications. This could mean mandatory units are even expanded to include things like Lifting and hoisting, well control etc depending on the scope of work and its risk.</p>
<p>For drilling and rig workers new to industry is there a need to allow for initial exposure to the work environment prior to enrolment into formalised training? How would this maintain or improve competency?</p>	<p>Yes. The Initial exposure period to the work activities and operations is key to the learning context. Employees struggle in early periods of employment to link the context of work and risk with RII qualifications. The focus is and should remain on personal safety and a simple task focus initially. Once employees develop an understanding of the operation, RII becomes more relevant to them. Perhaps 3 swings.</p> <p>This is also the period when most people make a decision whether the lifestyle is for them also so prevents unnecessary cost as well to the industry. This removes an administrative and cost burden with little to no value to the industry whilst maintaining a risk and safety focus.</p>

<p>Should well control be a mandatory component of competency requirements for drilling and well servicing workers?</p>	<p>Yes. However this needs to be considered in conjunction with existing industry requirements such as IWCF and or IADC qualifications which are typically mandatory as well. Consideration for the RII competency could be rewritten to account for this.</p> <p>The existing RII competencies should be targeted towards operationalising well control activities at a site level including equipment operation and coordination of resources.</p>
<p>Should OCR's have specific competency requirements? If yes, what options should be considered?</p>	<p>Yes. Ideally this should be in place prior to OCR's commencing in those roles on some level. Alternatively, people holding these positions should be subjected to the same supervision requirements as Contracting Companies and have mandatory timeframes for the qualifications completion.</p> <p>It is important to note that OCR's have a big influence on the performance and safety of an operation so this should be factored into the content to be undertaken. The focus in the qualification should be on their role within the operation and perhaps include what their role does not entail as well to help produce alignment with existing Legislation / Regulations. This can be a grey area for OCR's at times so clarifying this for them would assist them to support operations effectively.</p>
<p>For drilling and well servicing operators that employ workers with international training and work experience, has there been any difficulty for these workers in receiving recognition of prior learning when seeking attainment of core electives and units under the RII package</p>	<p>The difficulty is usually in them providing evidence. This is largely due to distance but also due to the differences of the operations at times between their country of origin and legislative requirements in QLD and industry practices here. This has not been a big issue as we typically develop our own people these days. A massive industry ramp up or quick change of the scope of work required of contracting companies could re-introduce this issue though. e.g. increase in snubbing operations.</p>
<p><b>For RII training professionals ( RTOs and certified assessors):</b></p> <p>Are you able to provide a summary of requests received and approvals granted for recognition of prior learning related to the RII package for drilling and well servicing?</p> <p>What are the reasons given when recognition of prior learning has not been given?</p>	<p>Ventia has its own RTO so feedback from them has been provided as well to aid in this response.</p> <p>The need for RPL has traditionally been low in recent years however there has been an influx recently due to the change of interpretation from RSHQ as to what constitutes adequate supervision. The previous industry understanding of the definition of a competent supervisor as outlined in the P&amp;G Competency Standard i.e.</p> <p><b><i>“ Competent person</i></b>  <i>A competent person for the purpose of this Standard has the same meaning as the Work Health and Safety Regulation 2011. A competent person has acquired through training, qualification or experience the knowledge and skills to carry out the task.</i></p>

	<p>has meant those supervising could do so if adequate industry experience could be demonstrated. With the new interpretation of this section being that that they must now hold the qualification they are going to supervise, a rise in RPL activities has recognised as a legitimate pathway for experience people to become compliant with this interpretation.</p> <p><b>This in itself is somewhat counter intuitive, as the Recognition of Prior Learning process is in effect where someone demonstrates competence through previous experience, knowledge and skills to carry out the tasks.</b></p>
<p>What are your suggestions for an optimum, best practice competency framework?</p>	<p>A number of suggestions for improvements have been made previously in this response. This is summarised below with some additional suggestions to consider to address other challenges see across the industry.</p> <ul style="list-style-type: none"> <li>- Consideration for a reduced number of core units to those common across all qualifications where commonalities exist</li> <li>- Skill sets introduced to differentiate qualifications for different scopes of work e.g. Drilling, Work over, completions, wireline etc that promotes a risk based focus based.</li> <li>- Embedded qualifications. e.g. The certificate II is a pre requisite to a Certificate III. The Cert III is a prerequisite to the Certificate IV etc.</li> <li>- Licensed outcome for those successful in meeting the current industry standard as per the P&amp;G Competency standard which remains current as long as they can demonstrate currency. This would prevent the need to complete new qualifications as training packages are changed.</li> <li>- The P&amp;G Competency Standard should stipulate mandatory timeframes for someone to become licensed in their role. Licensing to be based on meeting the competency framework.</li> <li>- The requirement for people in more senior roles e.g. Derrickman, Driller and Rig Managers to have completed a portion of the qualification (perhaps the mandatory units) they are being promoted to, prior to being able to hold the position.</li> </ul>