

Submission to the Attorney-General's Department

Ongoing Professional Development for Commonwealth-registered marriage celebrants and Guidelines on Conflict of Interest and Benefit to Business for Commonwealth-registered marriage celebrants DISCUSSION PAPER – NOVEMBER 2016

SUBMISSIONS MUST BE RECEIVED BY 5pm FRIDAY, 13 JANUARY 2017

Your details

Name/organisation <i>(if you are providing a submission on behalf of an organisation, please provide the name of a contact person)</i>	QualTrain
Contact details <i>(one or all of the following: postal address, email address or phone number)</i>	

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- Microsoft Word
- Rich Text Format (RTF)
- txt format.

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Would you prefer this submission to remain confidential? No

Your submission

Thank you for the opportunity to submit this response regarding ***Ongoing Professional Development for Commonwealth Registered Marriage Celebrants***.

My name is Carol Astbury, I am the CEO of QualTrain Australia. I established this Registered Training Organisation in 2005. QualTrain Australia provides training for marriage and funeral celebrants in Western Australia. We are approved to deliver CHC41015 Certificate IV in Celebrancy.

Issue 1: OPD obligations that should be imposed on marriage celebrants

Number of OPD hours required for completion each year

In my opinion:

- Five hours of OPD per year is not excessive particularly if the activities are relevant, interesting, current and fresh (not rehashed).
- If celebrants had the option of an approved activity, for example studying units of competency such as **CUSMPF302A Prepare for performances** – then the requirement for a minimum of five hours pa would be met and indeed exceeded. This would prove far more valuable than an OPD activity such as 'Rehearsals'.
- Excellent ideas: *"The department could take the option of only preparing a compulsory activity in years where there has been a change to the legislative framework, or where a significant legal gap in knowledge has been identified."* Plus *"Training could be delivered by any approved training provider or may be made available directly by the department, for instance as an online test that the celebrant must complete."*

Issue 2: Timeframe for completing OPD activities

Requirement to complete OPD in a calendar year

In my opinion:

- This is an excellent idea: *OPD year aligned to the registration year, it is proposed to have a six month transition period between the conclusion of the OPD year on 31 December and the commencement of the new OPD year on 1 July. The department could either allow celebrants an eighteen month period in which to complete their OPD in the first year or allow a six month period without an OPD*

obligation.

Issue 3: Subject variety and availability

3.1 Guidelines for appropriate activities

- I would prefer to see the department move away from approved activities. It is quite correct that most of the activities that have been provided over recent years have been re-hashed – on the whole they do not satisfy the needs of experienced celebrants. I believe this is because of the limited range of options available.
- I believe the options to replace the approved activities should be relevant to celebrancy – not something vague such as First Aid training. There are enormous opportunities within the Elective units of CHC41015 CIV in Celebrancy, including: Business, Stagecraft, Performance, Pastoral – which would be of particular interest and relevance to the Religious Celebrants – and many more.
- Here I must add that there should be consideration for celebrants who have worked effectively as marriage celebrants for more than 20 years. Providing they have not been subject to disciplinary actions, I believe that OPD activities, other than the compulsory activity, should be a matter of choice. Many will desire to maintain the social network opportunities offered by OPD, particularly when conducted by celebrant associations. Others should have the opportunity to decline – you can't force learning on people, especially when they have 20 years or more experience, knowledge and skills.

3.2 Panel of training providers

- I agree with this point...
 - i) *Update the OPD panel of providers through a selection process*

This process (which is currently used) would specify minimum requirements, such as being an RTO (all currently have the Certificate IV in Celebrancy in scope), ability to comply with reporting on attendance to the department, ability to deliver training using suitably qualified trainers and using adult learning principles. Under this option, in addition to the panel of providers, we propose that BDMs would also be permitted to deliver recognised OPD and celebrant association conferences would continue to be able to be approved as OPD activities.

- Furthermore, I would like to see that each state or territory has at least one local approved provider. All the current providers are based in the eastern states. Air fares to WA are significantly higher than those between states on the eastern seaboard. This must add to the cost of delivering OPD when sending trainers here.
- QualTrain has provided a high standard of training here in WA for over ten years. We offer ongoing support to our graduates having developed a strong sense of community with them.

Issue 4: Exemptions from OPD

Exemption for first year of registration

- This statement is quite correct: *“... useful to a newly registered celebrant as it could be used to foster networks and identify other like-minded celebrants, to address practicalities/issues as they establish their business, or to establish an awareness of their obligation from the very beginning of their registration.”*
- The exemption might be more suitable if it was applied to the first **six months** following the completion of the qualification. Some newly registered celebrants may not start solemnising marriages for a while – if you don't practice what you learn, you can very quickly forget. This is why QualTrain has always encouraged our graduates to attend a refresher course after they qualify.

Issue 5: Compliance monitoring

Self-assessment

- I believe this would work: *“The department could consider developing the self-service portal to allow self-reporting ...”*
- I also believe this should be added as a safeguard: *“If celebrants were required to maintain their own record of attendance at OPD, it is proposed that they would be subject to random audits each year by the Registrar.”*

Part B: Conflict of interest and benefit to business

- My choice of these options would be: *Option 2: retain current policy on conflict of interest and allow a narrow range of benefits to business that are directly related to the role of a celebrant*
- I would not like to see the policy on conflict of interest change as I believe it is important to protect the image of a marriage celebrant – we are not ‘sales people’. I have always cherished and respected my role as a marriage celebrant.
- I agree that those celebrants who wish to provide simple items such as candles for the ceremony should be allowed to do so. They are providing a service, relevant to the marriage and in support of assisting couples to enhance their ceremony. Thus allowing a narrow range of benefits to business is acceptable in my view.