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17 Oct 2018

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NORTHERN AREAS COUNCIL

SUBMISSIONS ON ACCREDITED PROFESSIONALS CONSULTATION

The position of Accreditation Authority (Chief Executive) has enormous powers granted to the position which potentially appear to be unrestricted. Although these powers may be delegated to a person, position or body there are no parameters in how or what way this may be done e.g:

- The ability to vary qualification, experience and technical skills required by the regulations;
- Publish on the register such other information on the Accredited Professional as may be determined by the Authority;
- Determine who may be a qualified auditor and what qualifications or experience that auditor has;
- The process by which complaints about Accredited Professional are dealt with;
- The grounds upon which the delegated powers may be exercised;
- The power to recognise what constitutes CPD activity.

The Regulations should be more descriptive regarding the ways and means as to how such discretion is exercised.

Accredited Professional Level 1

Based on what has been published in the draft Regulations, Council's existing staff would not meet the accreditation requirements to have an Accredited Professional – planning level 1 (Assessment Manager). To access the functions, powers and duties of an Assessment Manager would be a direct additional cost to Council as council will be required to acquire the time of a person who can meet this new requirement to oversee the processes administered by council's existing staff.

ACCREDITATION PROCESS FOR PLANNING LEVEL 3

This accredited professional level enables performance assessed development. The fact sheet accompanying the draft regulations implies that an Associate Member of PIA would equate with level 3 status. However PIA qualifications of membership are not mentioned at all in the draft regulations but may be a body to which the Accreditation authority may delegate some of its powers. It is noted though that this is by no means apparent in the draft regulations.

This Council currently employs a Planning Officer who undertakes all assessment of development applications that are lodged. Council has not received an application with the complexity requiring referral to the existing structure of assessment panel in two years and more than 300 applications. This role would have to continue, at a minimum, at the

accredited professional – planning level 3 basis otherwise Council will be severely disadvantaged, financially and in terms of being able to provide a local service regarding planning advice, in not having such an accredited professional in house. The alternative is to refer applicants to consultant services where fees are likely to be higher.

The accreditation scheme needs to be flexible enough to recognise the current qualifications and experience of this officer to be accredited as a level 3 professional. This Officer currently holds the Certificate IV in Planning from Adelaide TAFE, she is an Associate member of PIA, approximately 12 years experience full time in the role as Planning Officer fulfilling Council's development assessment functions. In that time she has also attended numerous seminars and events which have qualified for CPD points in accordance with PIA's scheme. Council believes that such qualifications and experience should be acknowledged by the Accreditation Authority. If this person is not so accredited Council would be prejudiced in terms of delivering an effective planning service for the Northern Areas community.

As was acknowledged during the earlier consultation process respondents highlighted the challenges in regional settings. This Council is in total agreement with this sentiment and would argue strongly that the comments expressed in this submission are paramount to giving Council the best outcome in terms of fulfilling its planning role. There must be discretion and reasonable leeway in acknowledging the experience, skills and educational qualification that Council's Planning Officer has achieved.

COSTS

Council has a concern regarding the cost associated with the accreditation scheme. There will be the one off payments covering the costs evaluating applications and registering accredited professionals and also an ongoing annual cost associated with the self certification. It is not known what these costs will be and who will regulate the level of these payments. This is an example of a user pays system that is the accredited professionals who have no influence over what they would be obliged to pay in order to maintain their accreditation.

In the event that an application to become an accredited professional is refused the right of review through the South Australian Civil and Administrative Tribunal may also be a cost to the Council in relation to that reviewable decision.

In addition it is not clear who is responsible for resourcing the audit process whereby an accredited professional must have their activities audited by a qualified auditor (a person that satisfies the Chief Executive that they can act as an auditor). The draft regulations are not clear on who pays for the audit and what parameters are placed on the Auditors' level of involvement in auditing an accredited professional. If this is open ended, from a time point of view, the accredited professional (if that person is responsible for paying for the Auditor's time commitment) may have a financial obligation that is quite onerous. This would be another direct cost to the council in having to support the audit.

Therefore, above and beyond the current cost of supporting the Planning Officer's position, these sorts of costs are additional and will add pressure to Council's budget.