
From: Sue Giles [REDACTED]
Sent: Wednesday, 17 October 2018 11:26 AM
To: DPTI:Planning Engagement
Subject: Accredited Professional Scheme - Have YOUR SAY
Attachments: Accredited Professional Scheme Comments 17 Oct.docx

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Dear Sir / Madam,

I attach, for your consideration, comments on the draft Accredited Professionals Scheme, as it relates to Council Assessment Panel members.

As you will see from my comments, I strongly consider the proposed requirements and processes to be highly inappropriate.

I am aware that many CAP Panels and individual members made submissions on the earlier draft and it is apparent that the concerns they have expressed have generally not been taken into account. The current paper does not respond to the comments made and does not explain or provide a rationale for its current proposals.

I look forward to your response.

Sue Giles
Independent Member, Yankalilla CAP
Independent Member, Marion CAP
Deputy Independent Member, Alexandrina CAP

Phone: [REDACTED]
Mobile [REDACTED]

I wish to make a few short, but seriously held, comments about the proposed Scheme as it relates to Council Assessment Panel (CAP) members (Level 2 accreditation).

I am disappointed to note that very few changes, if any, have been made to the earlier draft scheme in respect to CAP membership accreditation, notwithstanding the numerous submissions made by many CAPs and current CAP members.

My particular concerns that remain about the Scheme include, but are not limited to:

- there being a cost to apply,
- the accreditation being valid for only ONE year, (especially in a context where individuals are appointed to CAPs for 2 or 3 years under SA legislation)
- the need to undertake 10 Professional Development Units EACH YEAR,
- having to keep records and prove you have satisfied the PD requirement BEFORE applying to renew your accreditation
- the specification that of the 10 hours of training, you must have at least 1 each of 4 specified areas (planning and design, decision making in Development assessment, governance, and ethics)
- the need to have professional indemnity insurance, in a context where you have no individual liability
- the need to show that your experience covers at least 6 months in each of 3 of the Skills required for Level 1 Professionals

In my view, the approach is overly bureaucratic. Indeed it is likely to be so burdensome and impractical that it will actively discourage professionals from applying to be independent members of CAPs. In particular it will discourage the most highly qualified people from applying as their qualifications and experience put them beyond question (for example former Commissioners of the ERD Court!).

Also, it will be a greater burden if an individual is not employed in an organisation that would

- a) pay them for the time required to fulfil the accreditation requirements (application, yearly Renewal Application, attendance at training sessions, and record keeping), AND
- b) pay the considerable costs likely to be involved, including professional indemnity insurance

In this way, again, this will be discriminatory against retired professionals, who until now have provided years of invaluable service to the community as members of D A Panels and C A Panels. The implications of losing the skills of retired professionals who offer decades of experience should not be taken lightly.

Conversely will the employers of employed people wanting to serve on panels be prepared to either subsidise their employees' membership requirements, or give them time off to fulfil the requirements?

The Scheme will impose unreasonable time and cost burdens on individuals. The costs should be carefully considered. It should be noted that the remuneration for being CAP member, which involves many hours of reading agenda papers, undertaking site inspections in one's own time and usually in one's own vehicle, followed by attendance at the CAP meeting, is not high (generally \$400 in city councils and \$350 in regional councils, where even more travel and inspection time is required). I understand these fees have generally not changed in over a decade. The role is more closely allied to being a voluntary position. Any proposed costs should be considered in this context.

In conclusion, clearly it is important that CAP members have appropriate knowledge and experience but there are already robust elements within the DPI Act and Regulations, including the Code of Conduct, and in appointment procedures. From my experience I have every confidence that Councils are more than competent to appoint appropriate independent members, and have ample powers to remove members if they are not fulfilling their responsibilities appropriately. The Discussion Papers and draft policies provide neither evidence nor rationale for the need for such a costly and time-consuming process.

I offer these views in the spirit of constructive comments.

Kind Regards

Sue Giles
17 October 2018