

17 October 2018

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17 Sep 2018

DPTI

Department of Planning, Transport and Infrastructure

By email: DPTI.PlanningEngaement@sa.gov.au

Dear Sir / Madam

Re: Submission on the Accredited Professionals Scheme Draft Regulations

Thank you for the opportunity to make a submission on the *Accredited Professionals Scheme Draft Regulations*.

I have considered the paper and provide the following comments.

- There does not appear to be any indication how past industry comments and recommendations have been adequately considered. Perhaps a Q&A paper on key items or responses could address some industry concern on how these matters have been considered?
- Level 4 building inspector – as previously mentioned, I question if there is an industry need/problem for the introduction of this level of accreditation with relatively low technical capability. Matters that I suggest need consideration include:
 - How the technical capability of this role will follow on through the profession.
 - Is the UniSA program currently producing more qualified people than jobs in the current system.
 - Whilst I understand this level of accreditation may appear attractive to regional councils that have difficulty attracting qualified building staff, regional staffing concerns are not limited to the building profession. There is also a combination of limited graduate/cadet training programs and a decline in work whilst at the same time a heavy reliance is placed on consultants.
 - Whilst I understand that the accreditation system is proceeding ahead of industry regulation, it is not clear how this links to the building regulation reforms which are in its early stages of review.
- Information should be provided regarding the length of insurance cover and limit of liability i.e. 10 years as per current legislation? There should also be limited liability for planning related disputes or challenges.
- There needs to be a system in place to ensure the degree of shopping around for a desired outcome from private practitioners is minimised or eliminated. If this is not managed

practitioners will find themselves pitted against others who 'interpret' the rules for the best client outcome.

- This practice does not create a highly skilled or valued profession.
- It also opens opportunity for greater community complaints and heavier council intervention or desire to act as a community representative when challenging certain private certifier decisions.
- It leads to an inconsistent planning system for applicants and the community whilst private certifiers are again perceived as 'racing to the bottom'.
- There should not be an automatic accreditation system as the system transitions, professionals should have to reapply as there are a number of potential level 2 and 3 accredited professional building in the industry who may have very limited experience and have received accreditation through previous systems.
- Level 2, 3 and 4 accredited professional building should not be able to approve structural works, calculations or performance-based solutions
 - Also providing a condition that practitioners shall only operate within their area of expertise is inherently flawed. I cannot imagine one certifier being awarded a job only to hand it off to someone else because they admit to not having the expertise. They would harm their image in the light of their client and also hand over business income.
- Clarification needed on what experience or qualifications required to become/act as an auditor under the Act
 - An audit every 5 years would offer little value. More frequent auditing would be required to achieve any noticeable outcome.
 - Also a private auditor, employed by a private consultant often leads to a desired outcome. Or at the very least the perception of such outcome. If a private audit approach is adopted perhaps a list of auditors can be held by a state agency and set audit fees can be established, the auditor could then be assigned at random to the private practitioner.
 - Auditing could be undertaken every three years at the time of reaccreditation and form part of that administrative process
- After careful consideration I feel that the costs associated with this form of accreditation system (i.e. registration fees, auditing, CPD etc.) need to be carefully considered as all costs will be passed onto the consumer. There needs to be a demonstrated value!
- Part 8 – 29 (1)(c) accredited professional involved in council related works? Surely an assessment manager or delegate should be able to assess minor council development, similar to crown land activities.
- Relevant planning qualifications lists final year of enrolment as 2009 – is this a typo? If not why was 2009 selected as a cut-off date?

- There should be a clear and easily accessible way for legitimate complaints to be lodged by councils, private practitioners and the community regarding both individual developments and the regulatory system as a whole. The current and proposed approach is to cumbersome.
- General observation – both the planning and building accreditation schemes do not appear to relate experience with level of accreditation; there needs to be clear training and development paths for industry members.

Yours sincerely



Jeff Shillabeer

Phone: [REDACTED]

Email: [REDACTED]

Registration PC106