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DPTI

Feedback from the City of Campbelltown for the:

Draft Accredited Professionals Scheme

Planning, Development and Infrastructure (Accredited Professionals) Regulations 2018

The accreditation authority (Chief Executive) which has significant obligations and discretion in the operation of the scheme, must take proper and full responsibility and be provided with adequate resources to regularly and comprehensively audit, investigate and enforce compliance. There cannot be an expectation councils will be involved as they have no responsibility, receive no fees and have limited general resources to pursue such matters.

Part 2 - Classes of accreditation

Staff are comfortable that the classes of accreditation make sense, in that different levels of responsibility are reflected in varying requirements for experience.

Part 3 - General provisions relating to accreditation

Division 1 – Obtaining accreditation

The annual registration requirement seems excessive, given most professionals also need to maintain accreditation with other entities (eg. PIA or AIBS) this could be an unreasonable impost.

A central and second high registration fee (above minimal administration costs), CPD (Continuing Professional Development) and official record keeping undermines and duplicates recognised professional association membership and is unwarranted.

Division 2 – Cancellation or suspension of accreditation

Having a clear process around suspension and cancellation of Accreditation is sensible and the criteria proposed in the draft Regulations seem appropriate. Utilising cancellation and suspension will be key to ensuring the integrity of the system. The current arrangement for private certification suffers from a small minority who consistently undertake shoddy work with little ramification.

Government will need to ensure that sufficient resources are allocated to make the proposed system workable and enable staff allocated to the Scheme to investigate and appropriately deal with complaints and or failures of persons accredited under the scheme.

Consideration should be given to a regime of fines as well as suspensions and cancellations.

Part 5 – Audits

It is considered that the auditing should be skewed towards the private operators for the simple reason that Local Government already has a number of auditing and decision review processes which considerably reduce the risk of maladministration and or inappropriate decisions.

Accredited Professionals qualifications, experience and technical skills required by the Chief Executive under Regulation 5 of the draft *Planning, Development and Infrastructure (Accredited Professionals) Regulations 2018*

The extent of experience and core skills for planning level 3 and 4, total of 3 and 1 years respectively an 6 months in any 3 of 14 'Technical Skills' (rather than applicable key core skills), is inadequate and this could apply equally to the Building Levels as well

Recognition and arrangements with relevant professional associations for membership and CPD (Continuing Professional Development), eg PIA or AIBS, is supported

Process and practicalities of Assessment Managers 'Peer Reviewed Compliance' is unclear, uncertain and requires comprehensive delineation

Accredited Professionals – Code of Conduct

Private Certifiers interpretation, judgement and decisions must be transparent including publishing reasons and involve full accountability and liability for flow-on implications, eg errors, omissions, challenges and redress.