
From: Gary Brinkworth <[REDACTED]>
Sent: Monday, 15 October 2018 3:16 PM
To: DPTI:Planning Engagement
Subject: Accredited Professionals Scheme response

Good afternoon

I would like to provide the comments below in relation to the Accredited Professionals Scheme Draft:

1. Industry bodies could provide the support to the Chief Executive of DPTI in relation to complaints, particularly for the related fields, as they have specific technical knowledge to audit the decision making process. It may be possible to appoint a Council to investigate in some circumstances as well if independence is maintained. The CE of DPTI would need to be satisfied that they are appropriately qualified to perform such an investigation if appointed under Reg 27(7) of the PDI Regulations. This should be similar to the CE of DPTI appointing an auditor under Regulation 26.
2. There should be penalties for not participating with the audits in accordance with the Scheme. Accreditation will only be as good as the auditing will require it to be and if there are no implications for not complying with the audit then there would be no point in bringing it in in the first place.
3. For private practice professionals, a certificate of currency should be provided to ensure that the right level of protection is supported. For those who work within Local Government, confirmation of employment will provide the necessary details as they will be covered under the Mutual Liability Scheme as per the recent advice.
4. Design is an important consideration for the Level 1, 2 and 3 accreditation as these will include performance based assessments; however will become less important for 4 accreditation in the non-mandatory CPD topics as they will only be dealing with the deemed to satisfy development.

Other comments:

1. The Regulations should include reference that when an Assessment Manager is appointed through the CE of the Council, any appeal against the decision of the Assessment Manager is not against that individual, but against the Assessment Manager of the Council (for example, this would read as versus the Assessment Manager of Playford Council). This would ensure some level of onus on the Council to provide the defence for a decision if appealed, particularly when an Assessment Manager may not be an employee of Council.
2. While more reflective of the Assessment Pathways comments that I have provided, a private sector planner should not have the ability to make performance based decisions as it is in their interest to provide an approval as they are being directly engaged by an applicant. Further, there is no incentive in them providing a defence on a decision that is appealed as they only receive payment for the decision, not for any time spent in defending that decision. This would consider to be contrary to Reg 29 (1)(b) as they automatically have a direct financial interest in providing the function of assessment.
3. Overall, while balancing the need for work to continue, having a minimum of 20 hours CPD over a 3 year period for a Level 1, 3 and 4 planning officer does not reflect ongoing professional development of a high standard. While acknowledging that regional council's may face different obstacles and all Council's and private practitioners will need to accommodate the cost and time spent in obtaining the CPD points, this amount of training should be mandatory on an annual basis and could include alternative options such as online training sessions. 20 CPD points per year would be more equivalent to the requirements for accreditation that a Building Surveyor must obtain under the AIBS Scheme which is a much more rigorous and useful training volume.
4. The Regs should include more definitive terms where audits or complaints provide that an accredited professional has not acted appropriately, that they will face appropriate action. The current wording says that the accreditation authority 'may' provide direction in relation to an audit or 'may' provide take action in relation to a complaint. If a breach is discovered then some form of action should be taken relative to the nature of the breach.



**Gary Brinkworth | Manager Planning Services
City of Playford**

P: (08) [REDACTED]

[REDACTED]

www.playford.sa.gov.au

12 Bishopstone Road, Davoren Park, SA 5113



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