

Response ID ANON-FC9E-6C6J-Z

Submitted to Continuing professional development on the National Construction Code

Submitted on 2021-09-03 13:49:01

Information collection

1 Important: Please ensure that you have read and understood the below statements before proceeding

2 By making a submission to this consultation you agree to the collection of the information you provide in your submission; and the use and disclosure of the information you provide in your submission as outlined above.

Publish response

Personal Information

3 What is your name?

Name:

Jill Brookfield

4 What is your email address?

Email:

hello@aacertifiers.com.au

5 On whose behalf are you making this submission?

Oh whose behalf are you making this submission?:

I am making this submission on behalf of an industry body

6 What is your organisation?

Organisation:

Association of Australian Certifiers

7 Which best describes your industry sector?

Which best describes your industry sector?:

Building Certification/ Surveying

If other, please specify.:

8 Please select your state or territory

State or territory:

NSW

9 If you work in the building industry, in which state or territory do you undertake the most work?

which state or territory do you undertake the most work:

NA - I do not work in the building industry

Acronyms and definitions

10 Do you agree with the terminology proposed for 'continuing professional development (CPD)' and 'CPD on the NCC'? Please explain your answer and, if applicable, propose alternative terminology.

Yes

terminology:

Add a term for professional educators given that these people fall outside the definition of 'Practitioners'.

11 Are there additional terms that are relevant to BCR recommendation 3 that should be defined in the Preferred Terms Publication?

Yes

If you answered 'yes', please provide further information:

Add a term for professional educators given that these people fall outside the definition of 'Practitioners'.

Context

Overview of model guidance

Principle 1: CPD on the NCC is compulsory

12 Should all registered practitioners identified in the NRF complete CPD on the NCC? If you answered 'no' or 'unsure', please explain your answer.

Yes

explanation:

13 Should all practitioners be required to undertake CPD on the NCC each year? If you answered 'no' or 'unsure', please explain your answer.

Yes

all practitioners:

The minimum requirement should be to attend an update seminar run by ABCB or another CPD provider. Regional practitioners can attend via internet (Teams / Zoom etc).

14 Should CPD on the NCC be completed by 30 June each year by all practitioners? If you answered 'no' or 'unsure', please explain your answer.

No

30 June?:

There are already other pressures on practitioners on or around that date. The same applies to the end of December.

Suggest 1st of May each year as it co-coincides with the preferred date that Amendments to the BCA are issued and therefore is readily remembered by practitioners. If 1st May is no longer the preferred date for BCA amendment make it the same date as the preferred date for BCA amendment.

Principle 2: The amount, type and expiration of CPD on the NCC is regulated

15 Are there any types of CPD activities missing from Table 4 that should be included? If you answered 'yes' please provide further information.

No

missing CPD:

16 Do you have any comments on the content of Table 4? If you answered 'yes' please provide further information.

Yes

comment on Table 4:

The "note 1" to table 4 states that CPD related to time accumulated should only be counted where relevant to time spent on NCC. This note should be deleted or better clarified such as:

- Time spent on NCC and associated Standards should be itemised and accounted for in the CPD claim made by a recipient so that any minimum requirement of the scheme can be verified; and
- Technical issues related to regulations or industry issues can be included in CPD.
- Time spent by committee members discussing technical issues including NCC is valid CPD time.
- Preparation time in terms of reading technical or industry documents can be counted as CPD. BCA component should be separated.
- Other activities such as time spend at lunch and travel should not be counted.

17 Do you agree with the content of Table 5 Proposed allowable types of activities for CPD on the NCC based on NRF discipline? If you answered 'no' or 'unsure' please provide further information.

No

comment on Table 5:

For the Discipline of Building Surveyor, CPD types 5 to 13 should be permitted. They should be weighted appropriately and also documented to ensure they have appropriate content.

For example, a safety induction to enter a construction site does not count as CPD but white card training on or off site does count providing the person

passed and obtained the white card.

18 Do you agree with content of Table 6 Proposed CPD on the NCC amount (hours/annum) for each NRF discipline as a proportion of 'Typical CPD requirement'? If you answered 'no' or 'unsure' please provide further information.

No

comment on Table 6:

No.

The deficit that exists for all design and installation disciplines is chronic.

The level of understanding is not at a point of competent decision making even with the assistance of a consulting Building Surveyor.

The "Proportion of Typical CPD requirement proposed as CPD on NCC" in table 4 should be an effective increase in total CPD hours for a period of 5 years. eg Architect = 20 hours of CPD per annum, plus 5hrs specifically allocated to BCA.

19 Should the required amount of CPD on the NCC vary according to a practitioner's level of registration? If you answered 'yes' please explain why and how the requirements should vary.

No

vary based on registration:

No.

It is largely the case in terms of building surveyors that senior technical staff help junior staff solve technical problems and therefore mentor and learn as a result outside of CPD. Senior staff are also more likely to write training content for staff and also represent on industry committees and bodies etc.

The more appropriate question is whether technical staff that are not accredited should be required to participate in CPD across all disciplines. EG why would non accredited Architects that do technical work not require CPD?.

20 Do you have any other comments on the type and amount of CPD on the NCC proposed for a particular practitioner discipline? If you answered 'yes' provide further information.

Yes

additional comments:

The CPD of 30 hours per annum with 7 hours of BCA content included is appropriate for Building Surveyors.

The CPD of 12 hours for Project Managers is insufficient given it is project managers that typically skirt around the design team looking for a cheapest approach on behalf of the principle or head building contractor. For example, in practice it has been the project manager assisting the owner (along with the architect) to select the buildings external wall components. Improved technical knowledge for Project Managers allows them to rely less on the Building Surveyor in understanding matters of critical importance.

21 Do you agree with the proposal that outlines the required CPD on the NCC for practitioners with multiple registrations? If you answered 'no' or 'unsure' please explain your answer.

Yes

multiple registrations:

22 Do you agree with the proposal for carrying-over CPD on the NCC? If you answered 'no' or 'unsure' please explain your answer.

Yes

carrying-over:

Principle 3: CPD on the NCC is evidence-based and is complemented by ethics CPD

23 What sources of data should inform CPD content (focus areas of the NCC) for each practitioner discipline?

data for focus areas:

1. Fundamentals of the BCA
2. Areas subject of complaints by the public or court judgements that are relevant.
3. Changes to BCA explained for each discipline as applicable
4. Matters the subject or request for change to the BCA
5. Matters of co-ordination between disciplines that, if not addressed can cause fundamental failure to comply for example both Electricians, Plumbers, Building practitioners and Building Surveyors ALL need to understand how to select an appropriate fire collar for a fire rated service penetration including how to present the evidence the system is suitable and how to check the test report (not the brochure) for compliance. ALL of these practitioners having these skills will provide a better outcome than the current issue where Building Surveyors check them at building completion and struggle to get the

relevant information to validate.

24 Do you have any comments on the proposal for CPD on the NCC to be based on evidence and data? If you answered 'yes' please provide further information.

No

comments on evidence and data:

25 Do you believe compulsory CPD on ethics should be undertaken by all practitioners? Please explain your answer.

Yes

ethics :

26 Besides the NCC and ethics, are there other subject matters that should be mandatory for some types of practitioners? If you answered yes, please provide further information.

Yes

other subject matters:

Business studies that identify the fundamental economics of design businesses, certification businesses that provide a basis for practitioners to understand what they should be charging (as a minimum) for professional services considering the long term view of careers and business survival. Undercharging is a chronic issue in some parts of the industry.

27 Do you have any comments on the proposed model guidance for Principle 3? If you answered 'yes' please provide further information.

No

comments on P3:

Principle 4: Transparent and consultation-based CPD on the NCC

28 Are there other matters that can assist transparency and improvement of CPD on the NCC and/or CPD schemes? If you answered 'yes' please provide more information.

No

other matter that can assist transparency:

Principle 5: Evidence and records of CPD on the NCC are retained

29 Should practitioners retain their CPD on the NCC records for at least 6 years? If you answered 'no', or 'unsure' please explain your answer.

Yes

retaining records:

30 Do you have any comment on the recommended evidence that a practitioner should record and retain of CPD on the NCC they have completed? If you answered 'yes' please provide further information.

No

comment on evidence:

31 Should a practitioner be required to provide evidence of their fulfilment of CPD on the NCC prior to re-registration or would a declaration be sufficient? Please explain your answer.

evidence or declaration - Evidence should be provided:

Agree

evidence or declaration - A declaration should be provided:

Agree

Please explain your answer:

Principle 6: CPD on the NCC is oversighted

32 Should a proportion of a CPD scheme's participants be randomly audited each year? If so, please explain your answer and include a suggested percentage e.g.10%.

Yes

auditing:

33 Do you have any comments on the proposed auditing and enforcement strategy? Please explain your answer and provide further information if necessary.

No

comment on auditing and enforcement:

34 Should all practitioners be subject to the same potential consequences? Please explain your answer.

Yes

potential consequences:

35 Should practitioners be subject to additional disciplinary measures where they make a false declaration? Please explain your answer.

Yes

additional disciplinary measures:

36 Do you have any other feedback or suggestions to improve the national model guidance proposed for BCR recommendation 3? If you answered 'yes' please provide further information.

No

other feedback or suggestions: