

ATTENTION: The Research Director

**RE: Submission for the Inquiry into the Operation and Performance of the Queensland Building Services Authority**

I wish to make submission to assist the relevant committee with this inquiry as follows.

- 1.0 The effectiveness of the Q.B.S.A. to provide remedies for defective building work and to provide support, education and advice for both those who undertake building work and consumers.
  - 1.1 An effective way to inform license holders on relevant changes in legislation would be I feel, to email such information to the applicable license holders advising of changes (where obviously Q.B.S.A. have email addresses of those licensees). This proactive measure would assist in informing changes to licensees on legislation ensuring possible legal compliance being more readily achieved at a minimal cost to Q.B.S.A.
  - 1.2 An easier way for persons to be able to identify licenses could be through more user friendly license information viewing via the computer system/web site of Q.B.S.A. i.e. outline current license type/s and restrictions being completely separate to history of licensee, all in easy readable versions. The Fire Licenses particularly tend to be complex currently and could be simplified.
- 2.0 Whether the current licensing requirements of the Q.B.S.A. are adequate and that there are sufficient auditing processes to maintain proper standards.
  - 2.1 I am given to understand there currently is no vetting/auditing of curriculum to courses to ensure continual relevance and/or to prevent any eroding of courses for commercial reasons (i.e. competition between course/training providers in turn leading to possible lowering of standards). It is unknown who judges the required courses for licensing as being adequate and continually adequate. There doesn't appear to be any Q.B.S.A. set levels/targets/benchmarking required for curriculum to meet, in the make up of a course that would be appropriate.
 

It seems that any incorrect course curriculum could lead to inappropriate outcomes and in turn not provide a licensed person with the required knowledge to carry out tasks to the appropriate level of competence as expected, i.e. has the top 10 defects as identified regularly by Q.B.S.A. been investigated to ensure these matters are then in turn forming part of the course providers/trainers curriculum for the relevant license course/s in an aim to curb those defect areas for new licensees?

It would seem to be a proactive step in lessening defective/inappropriate work practices by ensuring the correct level of education is achieved at the outset.

This appropriate knowledge would also assist the licensee from unknowingly undertaking work which is defective/non compliant.

As a building certifier I am continually educating basic knowledge of building requirements to licensees whom I feel should have been taught those basics from the course/s they have undertaken or ascertained via correct RPL procedures.

In conversation to other building certifiers I know I am not the only building certifier who has these sentiments.
  - 2.2 If Continuing Professional Development (C.P.D.) is seen appropriate for building certifiers and pool safety inspectors then for the same reasons why isn't a suitable CPD system deemed appropriate for builders?
 

In attending a recent Q.B.S.A. Roadshow, it was noted that very few builders or trade persons attended. The course content was appropriate for industry changes but this seminar education wasn't being received by the intended persons due to lack of attendance. A suitable CPD system

would surely assist continual education needs and be another proactive step in assisting the industry and consumers expectations. Perhaps in industry associations could assist in administration with Q.B.S.A. on suitable CPD scheme.

- 2.3 If defective work is found to exist then all the licensed persons involved in that work should be responsible to some degree. Otherwise the person/s that caused the problem may continually cause the same problem because they may perceive that someone else will take the blame for their inappropriate actions every time.
- 2.4 Currently there is an auditing process and complaint process required for building certifiers which does not convey to any other license or registration types (separate to Q.B.S.A.) . If it is considered a good thing to have for building certifiers then why isn't it also a good thing to extend this arrangement to other licenses for similar reasons. Building certifiers do not build buildings and are not designers and are not the cause of industry problems documented, i.e. when a building certifier is audited there is no auditing on the licensed designed drawings associated with an approval for a competent level of design when a building certifier is audited via an inspection process there is no auditing onsite of other licensees work for competence.

In summary, I feel that acting in a reactive way deals mostly with the symptoms of the problem and not necessarily the real cause/s. (It appears that Q.B.S.A. has been structured in this way). Increased proactive action by proper course curriculum for licensing, continual education via CPD system/s and appropriate auditing systems (of courses and building industry personnel) would go a long way in addressing issues up front. This in turn I feel should reduce inappropriate work practices from occurring initially. This could have a further effect of a more professional industry together with increased consumer satisfaction to result therefore resulting in less complaints to Q.B.S.A.

### 3.0 Other issues

- 3.1 When a building certifier's conduct is judged to be inappropriate (either unsatisfactory conduct or professional misconduct) by the Q.B.S.A., the matter is automatically and inappropriately posted to the website under the licensees name.

I feel that this information should not be provided to the website until the building certifier right of appeal has been considered, either by the building certifier not wishing to appeal within the timeframe (at the end of the appeal timeframe) or if making the appeal, the outcome of the decision, which could differ to the Q.B.S.A. judgement in which case the building certifiers action may not be deemed inappropriate or may change to a lesser charge. This would seem to be a more appropriate system to be undertaken prior to posting to the website under the licensees name.

- 3.2 When a building certifier complaint is received by Q.B.S.A. the Q.B.S.A. should have the authority to vet the complaint for appropriateness. For example, if the complaint is about matters clearly outside the building certifier's role then the complaint should be deemed invalid for those reasons.

Regards  
Darren Clarke  
Certfier A41617

