

**RESPONSE to:**

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**ABCB**  
National Registration  
Framework for  
Building Practitioners

*Discussion paper*



## INTRODUCTION

This submission is made by the Swimming Pool and Spa Association of Australia (SPASA).

SPASA represents hundreds of local and national businesses within the swimming pool and spa industry across Australia.

In Australia, there are approximately 1.2 million residential pools, 1,885 aquatic centres, 200,000 portable pools and 350,000 portable spas.

The national swimming pool and spa industry contributes more than \$1.4 billion dollars into the Australian economy annually and is an employer of in excess of 42,000 people.

The Swimming Pool and Spa Industry is diverse and includes five main sectors:

- Pool & Spa Builders
- Pool & Spa Service Technicians
- Ancillary consulting services
- Manufacturers of Chemicals & Equipment
- Pool & Spa Barrier Safety Inspectors

SPASA Australia's consultation process for the [National Registration Framework for Building Practitioners Discussion Paper](#) has included a broad range of industry stakeholders.

Our feedback enclosed.

## BUILDING CONFIDENCE REPORT

Whilst the [Building Confidence Report](#) (BCR) did address builders and other license categories, it did not specifically address the functions of swimming pool and spa construction, maintenance and servicing.

In summary:

### **Swimming Pool and Spa Building:**

Qualification: CPC40808 - Certificate IV in Swimming Pool and Spa Building  
(Qualification is being updated)

Licensing Regions: QLD, NSW, ACT, VIC, TAS, SA

### **Swimming Pool and Spa Service:**

Qualification: CPP31218 - Certificate III in Swimming Pool and Spa Service  
CPP41319 Certificate IV in Swimming Pool & Spa Service

Licensing Regions: QLD, NSW, SA

# BCR RECOMMENDATIONS

## Recommendation 1:

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That each jurisdiction requires the registration of the following categories of building practitioners involved in the design, construction and maintenance of buildings:

- Builder
- Site or Project Manager
- Building Surveyor
- Building Inspector
- Architect
- Engineer
- Designer/Draftsperson
- Plumber
- Fire Safety Practitioner

SPASA Australia **supports** the recommendation.

## Recommendation 2:

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That each jurisdiction prescribes consistent requirements for the registration of building practitioners including:

- certificated training which includes compulsory training on the operation and use of the NCC as it applies to each category of registration
- additional competency and experience requirements
- where it is available, compulsory insurance in the form of professional indemnity and/or warranty insurance together with financial viability requirements where appropriate; and
- evidence of practitioner integrity, based on an assessment of fit-and-proper person requirements

SPASA Australia **supports** ongoing Continuing Professional Development (CPD) but notes there is a distinction between mandatory participation and mandatory learning in the context of CPD.

Just because learning is mandated does not automatically mean that it leads to mandated learning.

If government proceed with mandated learning, then this should be done under broad concept of “Topic Areas” where specific industry participants can participate in subjects they feel are necessary to address their professional development.

Example: “Technical Topic Area” examples for a swimming pool builder may include: Pool & Spa Hydraulics, Interior Finishes, relevant Australian Standards and specific NCC references.

## IMPORTANCE OF QUALIFICATIONS

### **SPASA Australia supports a qualified workforce.**

The importance of having nationally recognised qualifications for the swimming pool and spa industry is that they can meet the needs of industry, government, industry regulators and the community by:

- addressing an area of recognised skills shortage in a growth sector
- providing a defined training and assessment pathway for new entrants seeking employment
- providing a mechanism, through recognition of prior learning, for the existing swimming pool and spa workforce to gain national recognition of their skills
- providing for recognition of and promotion of higher-level skills among the swimming pool and spa workforce
- providing a measure that governments, industry regulators and the private sector can use to specify the level of competence required by people involved in servicing domestic, commercial and public swimming pools and spas
- providing a means by which consumers can have confidence in the advice being offered by individuals and companies from the swimming pool and spa industry.

## LICENSING

Currently, a licence is issued in the following regions as follows:

### **Swimming Pool and Spa Building:**

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**QLD:** on completion of CPC40808 - Certificate IV in Swimming Pool and Spa Building

**NSW:** on completion of CPC40808 - Certificate IV in Swimming Pool and Spa Building

**ACT:** Has state based assessment requirements and not nationally recognised qualifications as their pathway.

**VIC:** For the restricted Pool Builder license, Certificate IV in Swimming Pool and Spa Building (CPC40808), including the unit: Arrange building applications and approvals (CPCCB4026A)

**SA:** Completion of CPC40808 - Certificate IV in Swimming Pool and Spa Building or CPC40110 - Certificate IV in Building & Construction – these qualifications satisfy some of the requirements for licensing.

## Swimming Pool and Spa Building - Qualification Alignment

Qualifications, skills, and knowledge are required for the issuing of a licence or registration.

The aim of licence or registration eligibility requirements based on qualifications, skills and knowledge is to protect consumers from engaging licenced and registered practitioners who may deliver poor building outcomes due to failure to understand or reach a minimum standard of competence.

### SPASA Recommendation

The pathway for someone wanting to obtain a license for swimming pool and spa building or a licence which includes the ability to build a swimming pool and spa should be required to undertake the following:

Completion of: [CPC40808 Certificate IV in Swimming Pool and Spa Building](#)

**OR**

Completion of: [CPC40110 Certificate IV in Building and Construction](#)

**PLUS,** the addition of dedicated swimming pool Units of Competency from within CPC40808 Certificate IV in Swimming Pool and Spa Building

The benefit for regulators and consumers of qualification alignment is that tradespeople must undertake the appropriate qualification or units of competency for their licence class before being licenced and registered.

This ensures targeted and contextualised training, resulting in better outcomes and better consumer protection and confidence.

### Swimming Pool and Spa Service:

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**QLD:** on completion of CPP31218 - Certificate III in Swimming Pool and Spa Service

**NSW:** CPP31218 - Certificate III in Swimming Pool and Spa Service

**SA:** Either CPP31218 - Certificate III in Swimming Pool and Spa Service or CPP41319 - Certificate IV in Swimming Pool and Spa Service

## CONSISTENCY OF LICENSING

### SPASA Australia supports consistency of licensing.

Licensing is concerned with attesting that an individual or company meets certain criteria before being able to practise their trade.

Licensing allows the swimming pool and spa industry to groom new entrants so that we have a workforce that is skilled, accessible, motivated and well positioned to be a key differentiator of our industry's performance, compliance and economic success.

Unfortunately, consistency amongst Australian regulators for pool and spa building and service technicians is fragmented, with a wide variation in licensing pathways and the manner in which they grade or classify licence classes (where applicable).

If a real estate agent requires a qualification and a licence to simply sell a home, then a pool and spa builder or service technician should be required to undertake formal training if they are constructing or servicing a swimming pool in that same home? If not, why not?

### **FOR MORE INFORMATION**

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