

Response to:
Continuing Professional
Development (CPD)
guidelines for certifiers
Consultation paper

May 2020

ABOUT SPASA

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

SPASA Australia represents the largest body of swimming pool and spa industry professionals across the nation. Our charter is not only to advocate and respond on issues of importance to our industry, but also proactively create and execute strategies to enhance the credibility and longevity of our members and the broader community.

Members of SPASA Australia include pool builders, service technicians, retailers, manufacturers, suppliers, subcontractors, installers, consultants and other allied trades, all of whom set themselves apart from the rest of the industry by setting standards of skill, workmanship and ethical business behaviour in the best interests of pool and spa owners.

SPASA Australia is also the only Registered Training Organisation (RTO) nationwide dedicated entirely to the swimming pool and spa and broader industry. Our courses and workshops are designed in consultation with key industry stakeholders and our qualifications and accreditations are highly valued by government, regulators, employers, and the wider community.

SPASA - A KEY STAKEHOLDER

SPASA Australia is the national peak industry body for the swimming pool and spa industry in Australia and works with local and national organisations including local government at all levels for the betterment of the industry.

SPASA Australia has members in every region of Australia. In relation to training, there are approximately 5,000 Registered Training Organisations (RTO's) in Australia. Currently, SPASA's Training division is the only RTO in Australia dedicated entirely to the swimming pool and spa industry.

In shaping the swimming pool and spa industry, SPASA Australia has sat on the relevant working groups and participated on the following relevant Australian Standards:

- AS/NZS 1838 Swimming Pools – Premoulded Fibre-Reinforced Plastics - Design and Fabrication
- AS/NZS 1839 Swimming pools - Premoulded Fibre-reinforced plastics -Installation
- AS 1900 Flotation Aids for water familiarisation & swimming tuition
- AS1926.1 Swimming Pool Safety - Safety Barriers
- AS1926.2 Swimming Pool Safety - Location of Safety Barriers
- AS1926.3 Swimming Pool Safety - Water Recirculation Systems
- AS2818 Guide to Swimming Pool Safety
- AS/NZS 2416.1 Water Safety Signs and Beach Safety Flags
- AS/NZS 2416.2 Water Safety Signs and Beach Safety Flags
- AS/NZS 2416.3 Water Safety Signs and Beach Safety Flags
- AS2610.1 Spa Pools - Public Spas
- AS2610.2 Spa Pools - Private Spas
- AS3634 Solar heating systems for swimming pools
- AS2369.1 Materials for Solar Collectors for Swimming Pools: Rubber Materials
- AS2369.2 Materials for Solar Collectors for Swimming Pools: Flexible or Plasticized Polyvinyl
- AS3633 Private Swimming Pools - Water Quality
- AS3958 Ceramic Tile – Guide to installation of Ceramic Tiles
- AS4687 Temporary Fencing and Hoardings
- AS/NZS4755 Demand Response Capabilities - DRED
- AS New Standard Heat Pump Systems for Swimming Pools
- AS/NZS 5102 .1 Performance of household electrical appliances – Swimming pool pump –units
- AS/NZS 5102 .2 Performance of household electrical appliances – Swimming pool pump –units
- AS5125.1 Heat Pump Water Heaters - Performance Assessment: Air sourced

SPASA Australia's consultation process in providing feedback on the *Continuing Professional Development (CPD) guidelines for certifiers* has included a broad range of industry stakeholders and our feedback is tabled within this document.

3.1 POINTS ENTITLEMENT

1. Do you agree with the option of providing ½ point for 30 minutes of activity?

SPASA SUPPORTS the option of providing ½ point for 30 minutes of activity.

2. Do you agree with rounding down when determining the CPD points for an activity? If not, why not?

SPASA SUPPORTS the concept of rounding down and rounding up.

3. Do you have any other suggestions on how the hours of activity can be processed?

No Comment Offered.

3.2 SURPLUS POINTS

4. Do you agree with the number of surplus points that can be carried forward? If not, why not? Do you have any other suggestion?

SPASA SUPPORTS the concept whereby surplus points can be carried forward by ALL Certifiers (including E1 Certifiers). This concept is not foreign and consistent with the current requirement in NSW whereby Builders and Swimming Pool Builders can accumulate and carry forward up to 11 surplus CPD points earned in a year for 12 months.

If training is about enhancing knowledge and performance, then why can all other certifiers carry forward CPD hours and E1 certifiers not as proposed?

Whilst the limited number of CPD points required by E1 Certifiers has been flagged as the reason they cannot carry forward surplus points, the guide implies that the regulator does not consider E1 Certifiers to have the ability to retain knowledge let alone apply their training.

The segregation of the ability to carry forward could be viewed as discriminatory to this class of certifiers.

RECOMMENDATION: Ability to carry forward CPD hours is a generic practice and applies to all classes of certifier.

5. Do you agree that swimming pool inspectors should not be able to carry over surplus points? If not, why?

SPASA SUPPORTS any certifier's ability to carry forward CPD points and consequently, **SPASA does NOT AGREE** with the statement or rationale that E1 Certifiers should not be able to carry over surplus points because of the limited number of points they are required to complete each year.

It is important to note that A1, A2 and A3 Accredited Certifiers also inspect swimming pools and are not required to undertake swimming pool barrier specific initial or ongoing training.

Unlike E1 Certifiers who have a very specialised skill set and scope and must undertake CPD specific training, other certifiers are able to undertake a broad range of CPD activities even though they also undertake inspections of swimming pool barriers.

The difference between E1 Certifiers and other certifiers is their specialised scope of accreditation.

There is no valid justification as to why E1 Certifiers cannot carry surplus points earned in a year for 12 months in the same way that is proposed for other certifiers.

3.3 EDUCATION AND TRAINING FOR REGISTERED CERTIFIERS (OPTION 1)

6. Do the activities provide enough variety to enable a certifier to meet the 25-point requirement, particularly for certifiers in remote areas? If not, why? Do you have any other suggestions?

No Comment Offered.

7. Should the guidelines include/remove any activities? If so, what would you remove or include?

No Comment Offered.

8. Do the guidelines need to include more examples or details under each of the learning categories? If so, please provide details. No Comment Offered.

9. Do you agree with the points that have been allocated to the learning categories? If not, what points would you suggest and why? No Comment Offered.

10. Do you agree with the maximum caps that have been allocated to certain activities? If not, what would you suggest? No Comment Offered.

3.4 ACTIVITIES FOR SWIMMING POOL INSPECTORS

11. Is there enough coverage of learning activities, that can be completed to meet the 6 CPD points, for swimming pool inspectors and in particular those located in remote areas?

No. There is not enough coverage of learning activities that can be completed to meet the 6 CPD points for E1 Certifiers, and in particular those located in remote areas

There are currently 3 CPD Training Providers approved to deliver CPD. SPASA members have advised that:

- The premise of CPD training is to enhance the attendee's knowledge. Feedback has indicated that the CPD training to date remains within basic knowledge
- The regulatory body has a duty of care to the community and certifiers to ensure that there are a range of courses available that cover different levels of knowledge held by E1 certifiers, ie basic, intermediate and advanced
- There is only one active CPD approved Training Provider that schedules and consistently delivers face to face CPD opportunities (pre COVID-19 shut down)
- Other approved CPD approved Training Providers do not have regularly scheduled face to face CPD opportunities
- Provision of courses are infrequent as they are only run where a minimum demand has been met. This results in gaps in the provision of training and creates unnecessary burden on the E1 certifier and the regulatory body to provide exemptions on CPD hours
- Face to face and online CPD course material offered and/or delivered is repetitive and has not sufficiently changed since the inception of CPD for E1 Certifiers, thus the value add proposition is sub-optimal
- There has been and continues to be a lack of CPD opportunities for E1 Certifiers in both the metropolitan and rural areas
- The cost of CPD is an issue. There must be low cost and no cost CPD activities on offer for E1 Certifiers, more so after the impact of COVID-19 on small businesses which a majority of E1 certifiers are.

12. Should the guidelines include/remove any activities? If so, what would you remove or include?

Yes, E1 Certifiers should be given the opportunity and freedom to undertake low cost and no cost CPD activities with relevant peak industry bodies such as SPASA.

The breadth of the training also fails to provide content on business management principles, a topic that forms part of an E1 Certifiers knowledge required under their Code of Conduct. Soft skills, e.g. where negotiations are required.

13. Do you agree with points allocated for professional activities and private study/research?

SPASA SUPPORTS the concept of E1 Certifiers being allocated up to 3 CPD Points for professional activities and private study/research but detail provided in the consultation paper raises the following questions:

Writing Articles for Journals /other publications:

- What are accepted acceptable journals and other publications for swimming pool inspectors
- Just because a swimming pool inspector writes an article for a journal or some other publication does not necessarily mean that topics and material presented are correct
- Does the article for a journal or some other publication need to be published for CPD to be awarded?
- What are acceptable journals / other publication “audiences”?

Presenting at courses, conferences, seminars, symposia

- Just because an E1 Certifier delivers presentations at courses, conferences, seminars and symposiums does not mean necessarily mean that topics and material presented are correct
- Currently, the E1 Course and associated CPD Training providers (RTO's) must be approved by the Building Professionals Board before delivering activities. Does the proposed now mean that E1 Certifiers can delivers presentations at courses, conferences, seminars and symposiums any earn CPD Points? Do E1 Certifiers who attend such courses, conferences, seminars and symposiums earn the same CPD points as the presenter? **If not, why not?**

Private study and research (self-directed learning, informal personal study, web-based informal learning or reading industry journals)

SPASA SUPPORTS the concept of private study and research as long as learning outcomes are properly recorded and able to be demonstrated.

SPASA PROPOSES that Private study and research CPD should consider:

- CPD learning outcomes that are relevant and can be identified
- Educational CPD activities that are not part of a structural learning process
- new knowledge and skills that are acquired or being shared with peers

Examples may include:

- self-directed study of practice notes, technical magazines
- talks and presentations by industry associations or other bodies
- workshops, lectures, and seminars
- conferences
- involvement in mentoring programs
- participation in professional practice committees and advisory groups - through professional associations or other bodies such as SPASA

14. Do you agree with the maximum cap that has been suggested? If not, what would you suggest?

There is nothing wrong with the suggested caps. The issue lies with the approved content and material that is relied upon in allocating CPD.

Feedback from SPASA members is that the current content from the cohort of Professional activities provides no new learning outcomes as material and content is rehashed, inconsistent, subjective and confusing.

3.5 RECORD KEEPING

15. Does the list of examples in the guideline provide enough guidance or should other examples be listed?

SPASA SUGGESTS that a “*description of learning outcomes*” be considered.

16. Would the suggested record keeping template be useful to record your CPD activities? If not, do you have any suggested changes?

E1 Certifiers already record their CPD points manually, digitally, or both. Irrespective of recording method, guidance as to what material should be captured and records is a reasonable expectation.

4.1 CPD REQUIREMENTS – GUIDELINES

Council Certifier - 4.1 Point Requirements

If the focus is on enhancing the protection of consumers and industry's performance, why are Councils provided a two-year transitional timeframe?

The introduction of a CPD Guideline indicates that the government has concerns as to the level of competency within the industry and ultimately the level of protection to consumers is sub-optimal. If correct, does not a transition period provide a significant weakness within the overall framework and place consumers at risk?

I refer to the “*Investigation by BPB of Griffith City Council as a certifying authority*”. A online reference was sought so I could link the case, but all online references appear to have been removed.

Competency Floor

The assumption that completing hours of any training equates to competency in a field that is not covered is dangerous and places the community at risk of unprofessional / incompetent persons making decisions to which they are not trained or have participated in relevant initial or on-going training.

RECOMMENDATION: CPD Hours should be reflective of function / services provided. This approach ensures that there is a floor of knowledge / competency in the service provided.

9 EXEMPTIONS & NON-COMPLIANCE

Course Content

This section refers to the need for a certifier, under the Code of Conduct (Code), to remain informed of developments in the building design and practice, business management principles and relevant laws.

On review of the CPD courses available to E1 certifiers, there is no current approved course that covers '*business management principles*'. The way this requirement is constructed under the Code, an E1 certifier could be non-compliant as they may fail to remain abreast of '*business management principles*' as required under the Code.

In this regard, there is an obligation for regulators to provide a framework that can be complied with by providing access to courses that cover at least the mandatory minimum topics.

For More Information

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