SPASA
SWIMMING POOL & SPA ASSOCIATION

Response to:

Discussion Paper on Inspection Policies for Proposed Practice Direction Updates

State Planning Commission South Australia

Via email: plansasubmissions@sa.gov.au

https://yoursay.sa.gov.au/discussion-paper-practice-direction-updates

February 2026

About SPASA and the swimming pool and spa industry

The Swimming Pool & Spa Association of Australia (SPASA) is the peak industry body representing businesses involved in the design, construction, installation, and maintenance of pools, spas, and related products across Australia and New Zealand. SPASA's diverse membership includes large-scale operators, independent builders, retailers, consultants and service providers, all committed to delivering high-quality products and services that meet the needs of homeowners, builders and developers.

The swimming pool and spa industry is a key economic driver across Australia and New Zealand, supporting tens of thousands of jobs through the construction and installation of more than 12,000 new swimming pools and spas annually and the maintenance of more than 1 million existing swimming pools and spas.

SPASA recognises the role the industry has in delivering quality design, construction and installation, supporting by excellence in service and products. In advocating for our members, we are working to ensure there is a positive regulatory environment that balances the need for appropriate controls with the need to foster affordable and cost-effective building and maintenance solutions for swimming pools and spas.

SPASA is committed to fostering industry growth through collaborative policy development, guidance and support to understand and achieve compliance, and promoting the need for innovation in every part of the industry.

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Introduction

SPASA appreciates the opportunity to set out our position in relation to the Discussion Paper on Inspection Policies for Proposed Practice Direction Updates. This consultation is a welcome follow-up to the revision of Practice Directions (PD) 8 and 9 in 2025, the subsequent discussions SPASA had with the Department, and the feedback SPASA received from South Australian Councils following the release of the revised PDs.

In South Australia, there is inconsistency in how inspections are conducted across different council areas, particularly for swimming pools. Variations in the interpretation of regulations and PD8 have led to discrepancies in inspection practices. These inconsistencies arise from differing local council practices, qualifications, and expertise among inspectors, resulting in certain stages of building work not receiving consistent scrutiny or being overlooked entirely.

While the broader context of the Discussion Paper relates to domestic (home) building and large-scale residential developments, there are key elements of the Paper, particularly regarding PD 8, which directly impact the swimming pool and spa industry in South Australia. This submission focuses on those key elements.

Inspections Discussion

Context and history of PD8 revision

After ongoing discussions with the Department, following the release of 2025's update to PDs 8 and 9, SPASA is pleased to see this issue acknowledged in the consultation's discussion paper.

SPASA has consistently held the position that pool inspections should be mandatory at the point where the pool is 'filled with water', requires the installation of a temporary pool fence, and at the point where the permanent safety barrier is installed.

In 2025 SPASA engaged with South Australian Local Government inspectors throughout the state. Discussion focused on the changes brought into PD8, which were concerning and confusing, being that:

- Councils must inspect 100% of pool safety features.
- Councils can choose to inspect at *either* the installation of the temporary fence, or the permanent barrier.

Discussion with the Department explained that this choice was given due to sympathy for Council's apparent resourcing challenges.

> *"To overly prescribe requirements in the Practice Direction may result in an adverse outcome of some pools being inspected more than necessary whilst others may then be under-inspected as a result of the subsequent resourcing implications, which in turn could create a net increased risk, instead of reducing it. Thus the need to strike an appropriate balance taking into account all relevant factors, which the Commission considers has been achieved."*

However, SPASA and Councils we have engaged with, are largely aligned in the view that the permanent safety barrier was the more important mandatory inspection point, if Councils were unable to inspect at both points.

SPASA's position and recommendation

SPASA's position is that swimming pools should be inspected at the two key points:

1. When the pool holds 300mm of water, a temporary pool fence is required to be installed. This should be inspected against the appropriate standard: AS4687.4 Temporary fencing and hoardings - Temporary swimming pool fencing
2. When the final permanent safety barrier is installed. This should be inspected against the relevant standard: AS1926.1 Swimming Pool Safety - Safety Barriers

SPASA does not see the current wording in PD8 as something which supports 'flexibility for all councils', but something which creates ambiguity and ultimately puts lives at risk.

Indeed, during webinars, DHUD's own presentation team acknowledged that, "*council would show 'best practice' by inspecting twice*", and SPASA believes the practice direction should reflect that best practice.

Additional guidance

SPASA believes that additional guidance is required regarding swimming pool and spa compliance inspections.

SPASA maintains a consistent position on the distinction between referring to *temporary pool fences* and *permanent safety barriers*, requesting all levels of government, regulators, regulations and practice directions, ensure a consistent naming and referencing in line with the two primary standards.

Any references to *temporary fences* should not refer to 'temporary barriers' or 'barriers' of any kind, as this is inconsistent with AS4687.4 *Temporary fencing and hoardings - Temporary swimming pool fencing*. Temporary fences should only be inspected against this standard, as complying with 1926.1 is impractical and often not possible within an active project construction site, being for the very reason there are two standards.

Similarly, any references to the final *permanent safety barrier* should not refer to a 'permanent fence' or 'pool fence', as this is inconsistent with AS1926.1 *Swimming Pool Safety - Safety barriers for swimming pools*. Permanent safety barriers should only be inspected against the requirements of this standard.

Pools as part of a larger project

Regardless of complexity, where swimming pools and spas are part of a larger build project, the swimming pool should be inspected at the point where it holds at least 300mm of water, when the temporary pool fence is installed, and then when the permanent safety barrier is installed.

Inspection quota

SPASA's consistent position is that 100% of pools should be inspected at both stages, regardless of overall project complexity, and whether they are a standalone project or part of a larger construction build.

Resourcing and Recruitment Discussion

Broadening the pool of inspectors

SPASA recommends that the South Australian Government consider involving qualified Licensed Swimming Pool and Spa Service Technicians, along with other relevant industry professionals, to be involved in the pool barrier inspection process.

Given the focus on child safety around private pools and spas, it is crucial to engage qualified professionals already working within the industry, such as Swimming Pool and Spa Service Technicians. These technicians service hundreds of residential pools daily, and one of their first tasks is opening the pool gate upon arrival.

As well as members of the Accredited Professionals Scheme, the criteria for temporary fence and permanent pool barrier inspectors should include experienced industry professionals:

- Pool & Spa Service Technicians
- Pool & Spa Builders
- Pool & Spa Service Consultants
- Retired industry professionals with relevant experience
- Other experienced individuals

Incorporating industry professionals into the pool barrier inspection program would enhance its coverage and effectiveness across the state and ease the resource burden on Councils. Technicians are already familiar with basic swimming pool safety requirements as part of their duty of care, and their inclusion would contribute to improved outcomes for pool safety statewide.

A funding pathway would enhance recruitment into the industry, providing a funded qualification linked to a Pool Safety Inspector license category.

The relevant qualifications which support the previously listed professions are:

- CPP31218 - Certificate III in Swimming Pool and Spa Service
- CPP41319 - Certificate IV in Swimming Pool and Spa Service
- CPC40820 - Certificate IV in Swimming Pool and Spa Building

Notifications triggers

SPASA does not believe that linking mandatory notification stages to contractual progress payment stages is appropriate for the swimming pool industry.

One positive outcome from the last PD discussion was the alignment of pool inspections with the two project milestone triggers:

1. The point at which the pool becomes ‘filled with water’, holding at least 300mm of water, requiring the installation of a temporary pool fence; and
2. The point at which the permanent safety barrier is completed.

This was a positive outcome for our industry, which was welcomed by SPASA, its members, and other industry stakeholders.

These safety measures are intended to reduce the risk of pool-related incidents, and to ensure this, pool inspections should remain linked to these two project milestones.

Inspection Mechanisms

SPASA doesn't hold a specific position regarding whether there should, or should not be an allowance for remote inspections, however it does raise some questions for consideration:

1. Who would be providing the photographic content / drone footage?
2. How would they be directed to provide comprehensive content so an assessor could be satisfied they have seen all the necessary angles, viewpoints, and inspection locations?
3. How much back-and-forth would there be to ensure sufficient content is provided, and would this result in a real-world net reduction in resource requirements?

Fees

SPASA does not offer a comment regarding the consultation's questions on fees.

Conclusion

SPASA appreciates the opportunity to respond to the discussion paper in inspection requirements. The concerns and confusion that have arisen based on previous guidance should be resolved in a timely way that allows the swimming pool industry, Councils and consumers to have clarity and certainty. Ensuring swimming pools are inspected at the appropriate times for the purposes of ensuring public safety is essential.