



Response to:

**Continuing Professional Development
for Builders and Plumbers
Consultation paper**

Department of Environment, Land, Water and Planning – **VICTORIA**

July 2020

ABOUT SPASA AUSTRALIA

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

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 qualifications, 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 AUSTRALIA - A KEY STAKEHOLDER

As the national peak industry body for the swimming pool and spa industry, SPASA Australia works with local and national organisations and government 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.

QUALIFICATIONS

SPASA Australia qualifications now encompass the following:

Pool & Spa Qualifications

- CPC40808 Certificate IV in Swimming Pool & Spa Building
- CPP31218 Certificate III in Swimming Pool & Spa Service
- CPP41312 Certificate IV in Swimming Pool & Spa Service
- 10660NAT Swimming Pool Safety Inspection Qualification

General Building & Related Qualifications

- CPC40110 Certificate IV in Building and Construction
- AHC30916 Certificate III in Landscape Construction

Business & Retail Qualifications

- BSB40215 Certificate IV in Business
- BSB40615 Certificate IV in Business Sales
- BSB42015 Certificate IV in Leadership and Management
- BSB42518 Certificate IV in Small Business Management
- BSB50215 Diploma of Business
- BSB51918 Diploma of Leadership and Management
- SIR30216 Certificate III in Retail

Note: New Qualifications are pending.



AUSTRALIAN STANDARDS

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
AS2369.1 Materials for Solar Collectors for Swimming Pools: Rubber Materials
AS2369.2 Materials for Solar Collectors for Swimming Pools: Flexible or Plasticized Polyvinyl
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
AS2818 Guide to Swimming Pool Safety
AS2783 Use of reinforced concrete for small swimming pools
AS3633 Private Swimming Pools - Water Quality
AS3634 Solar heating systems for swimming pools
AS3958 Ceramic Tile – Guide to installation of Ceramic Tiles
AS/NZS4755 Demand Response Capabilities - DRED
AS4687 Temporary Fencing and Hoardings
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
AS New Standard Heat Pump Systems for Swimming Pools

SPASA Australia is grateful for the opportunity to comment on the [Continuing Professional Development for Builders and Plumbers - Consultation Paper](#).

Our feedback is enclosed.



QUESTIONS FOR STAKEHOLDERS

1. Are you aware of any additional areas of poor practitioner performance for building and plumbing practitioners? If so, please describe and provide any evidence if available.

The non-compliance areas flagged within the consultation paper are not unique and are consistent with that of other regions.

SPASA Australia submits that areas specific to the swimming pool and spa industry include:

- Equipotential Bonding of Swimming Pools, Spas, surrounding areas, and associated equipment
- Installation of Swimming Pool and Spa Safety Barriers
- Knowledge and application of Australian Standards
- Energy and Water Sustainable Solutions

2. Of the performance issues identified, what do you think are the root causes of the non-compliance?

Equipotential Bonding of Swimming Pools, Spas, surrounding areas and associated equipment

Equipotential bonding is one of the most misunderstood, yet extremely important steps, when installing or constructing a swimming pool and/or spa, associated equipment, and fencing.

Despite AS/NZS3000 being an Australian Standard and legislated in Victoria under the Electricity Safety (General) Regulations 2019, non-compliances occur and are not picked up due to a deficiency in regulatory oversight.

Installation of Swimming Pool and Spa Safety Barriers

The installation of Swimming Pool and Spa Safety Barriers can be complex as it requires a trained and skilled individual who is able to correctly interpret legislative and relevant Australian Standards when it comes to compliance.

Whilst the Regulations adopt the National Construction Code (NCC) which references the Australian Standards that are applicable for the construction of safety barriers for swimming pools and spas, non-compliances occur and are not picked up due to interpretational issues and lack of inspections.

Compliance of swimming pool and spa safety barriers is likely to significantly improve with the newly introduced barrier inspection program and associated training.

Increased pool barrier compliance should also flow from the ongoing safety campaign focus, surveyor/inspector training and Continuing Professional Development (CPD).

Knowledge and application of Australian Standards

Non-Compliances with projects are only ever identified when they are reported, there is regulatory oversight by appropriately trained individuals or some other trigger such as an independent report or assessment of the work ordered by someone with a direct interest.

Whilst the National Construction Code (NCC) contains the technical requirements and standards for the construction of buildings, there are only a few that are referenced for swimming pools and spas. A great many are not referenced at all.

Irrespective of whether they are listed in the NCC or not, discussions with industry participants reveal that many pool builders and ancillary trades have simply learnt through mentoring over the years as opposed to owning and referring to essential Australian Standards.

Accordingly, it should come as no surprise that there are some pool builders and ancillary trades operating in the industry that either lack knowledge or competence, do not properly understand the NCC or relevant Australian Standards and/or have never had proper training on their implementation.

Lack of oversight by regulatory authorities can contribute to the problem where there is inadequate funding or a lack of skills and resources to undertake effective enforcement.

Where there has been supervision, building surveyors may not have the necessary industry specific knowledge or background to proactively identify a specific issue(s).

Energy and Water Sustainable Solutions

The swimming pool and spa industry is unique.

Without water and energy, the industry is unable to function as intended post the construction/installation phase.

The NCC requirements for swimming pools and spas specifically only deal with pool heating in broad terms and does not refer to other energy saving possibilities or water efficiency in a closed system.

When a swimming pool and/or spa project is completed, the only thing left to do is to attach a range of products that will work together and allow the swimming pool and/or spa to function

3. Are you aware of any CPD courses already available that target any of the performance issues identified? If so, please specify.

Equipotential Bonding of Swimming Pools, Spas, surrounding areas and associated equipment

SPASA Australia has collaborated with Master Electricians Australia do develop consumer and industry facing guidance documents to improve compliance. These have been and will continue to be widely circulated.

Master Electricians Australia and SPASA Australia have, and continue to raise the importance of equipotential bonding to their members for swimming pools and spas.

Resources:

- **For Industry:**
[AS/NZS3000:2018 - Swimming & Spa Pools Explained](#)
- **For Consumers:**
[Homeowners Guide - Swimming & Spa Pool Equipotential Bonding](#)

Because of our collaboration with Master Electricians Australia, SPASA Australia has seen a spike in enquiries from members in all jurisdictions and the broader swimming pool and spa industry wanting to know more about how, when and what should be equipotentially bonded.

The collaboration and reach of Australia's two largest and relevant peak industry bodies

as a system. Typical products include pumps, filters, controllers, pool covers and heating, many of which function through the swimming pool and spas pipework.

The local and global environmental agenda is a significant driving force in crystallising industry and community awareness and expectations.

Improving how products and systems work together to achieve sustainable outcomes is now an imperative.

SPASA Australia is committed to leading and educating the swimming pool and spa industry to become a more sustainable and adaptive industry.

(SPASA Australia & Master Electricians Australia) should be embraced and exploited by regulators in assisting with improving compliance in this area.

Installation of Swimming Pool and Spa Safety Barriers

Whilst the compliance of swimming pool and spa safety barriers is likely to significantly improve with the newly introduced barrier inspection program and associated approved training, *there will still be gaps.*



Building practitioner threshold

In a great many cases, the installation or repairs of Swimming Pool and Spa Safety Barriers costs less than \$10,000 (including parts and labour) and **VBA registration or the use of a major contract is not required.**

It is not uncommon that handymen, many without qualifications or training and without any requirement to justify their competence can undertake the installation and repairs of swimming pool and spa barriers.

Consumers who engage such persons rely blindly on that person's expertise because of a website listing, referral, or some other advertising channel.

The "[Building Amendment \(Swimming Pool and Spa\) Regulations 2019 – Regulatory Impact Statement](#)" (RIS) referenced the 2018 survey carried out by the *Victorian Municipal Building Surveyors Group* (VMBSG) in cooperation with DELWP which found:

"There is a very high level of non-compliance on initial inspection – between approximately 80 per cent and 90 per cent."

The high percentage of non-compliance found at initial inspection stage indicates that pool and spa barriers were either installed incorrectly or that they had been badly maintained since their installation.

The RIS also highlights that "*the VBA are of the opinion that individuals who install barriers develop some skills and knowledge on job that would go towards the experiential learning requirements of this class.*" SPASA Australia could not agree more!

The \$10,000 threshold means that a substantial number of persons installing or repairing pool barriers are not registered and there is no building regulatory mechanism to ensure that they install or repair pool barriers in line with the standard(s) or have the requisite training and skills.

Consequently, some pool owners who genuinely wish to comply, are at risk of becoming victims of a non-complying pool and/spa barriers through no fault of their own.

On one hand, the government's policy position is to lift compliance through the newly introduced pool barrier inspection program whilst on the other hand we are allowing pool and spa safety barriers to be installed or repaired by untrained and unregistered practitioners.

SPASA **submits** that swimming pool and spa *consumer safety* is best protected by suitably trained contractors and VBA registered individuals..... irrespective of a minimum financial threshold.

Available Courses:

VBAISP2020 Course in swimming pool and spa barrier inspection

SPASA Australia in its capacity as an RTO intends to apply and be endorsed through the Victorian Building Authority (VBA) to deliver the VBAISP2020 Course in swimming pool and spa barrier inspection course.

At the time of writing this response, the Victorian Building Authority (VBA) endorsement process has not been finalised.

AS1926.1 Australian Standards & Legislative Workshops

SPASA Australia holds regular workshops in all regions on (but not limited to) the following topics:

- Sourcing correct resources
- National Construction Code
- relevant Australian Standards
- associated legislative requirements
- assessment of a pool environment
- complex pool and spa environments
- objective assessments vs subjective assessments
- Interpretational dilemmas
- Problem Solving

Workshop duration varies depending on audience and attendee engagement.

SPASA Australia considers such workshops as essential to anyone who has a duty of care and involved or exposed to swimming pool and spa barriers such as:

- Pool Builders
- Pool Shops
- Pool & Spa Service Technicians
- General Builders
- Fencers (under \$10k and unregistered)
- Fencers (over \$10k and registered and licenced)
- Landscapers
- Handymen

Knowledge and application of Australian Standards

SPASA Australia as the peak industry body and an RTO holds significant and relevant material covering nationally accredited qualifications which drills down on Building Codes and Australian Standards.

Training and Education is offered via:

- Nationally Accredited Qualifications
- Specific and accredited Units of Competency
- Workshops addressing specific areas
- CPD Sessions

SPASA Australia also convenes regular Regional and National Advisory Group meetings where members can raise issues or areas, they believe requires focus. This process can address issues in advance of them become a wider problem or reinforce established or new practices.

Energy and Water Sustainable Solutions

Pool and spa owners generally have an increased awareness of how sustainable their pool and spa products or system function more than any other products or system in the home.

The modern consumer has many alternatives available to them when considering a swimming pool and spa, products, and systems. It is therefore incumbent on peak industry bodies like SPASA Australia to make available information to consumers on how sustainable products or systems in their pool and/or spa are.

Understanding how best to optimise the use of water and energy is critical for the swimming pool our industry, consumers, and policymakers. The risks for the industry are too great to stay out of the policy debate.

Regulators want consumers being provided with up to date, relevant information about their projects and purchases. As an industry, SPASA Australia's goal is to:

- promote the swimming pool and spa industry as sustainable
- provide relevant and meaningful information to consumers that projects, products and systems they choose are water sustainable and energy efficient
- be able to differentiate the performance of sustainable products and systems
- ensure industry product and system knowledge is consistent and not confusing

4. If your organisation is a registered training provider, what is your level of interest or capacity to develop courses that build knowledge and skill in the performance issues identified?

Equipotential Bonding of Swimming Pools, Spas, surrounding areas and associated equipment

As Electricians are licensed, registered, and considered a specialty trade, SPASA Australia would look to further collaborate with Master Electricians Australia to ensure that the swimming pool and spa industry had access to additional materials and guidance.

Installation of Swimming Pool and Spa Safety Barriers

SPASA Australia is heavily invested in swimming pool and spa training and education. Our pool safety experience and knowledge on pool barrier related Australian Standards together with the associated legislation has been demonstrated over many years.

SPASA Australia has an interest and the capacity to deliver courses to address the deficiencies outlined in this submission.

Knowledge and application of Australian Standards

SPASA Australia is dedicated to lifting compliance through education and has the capacity to deliver courses to address the deficiencies outlined in this submission.

Energy and Water Sustainable Solutions

SPASA Australia is dedicated to increasing sustainability awareness and action within the swimming pool and spa industry as well as ensure that consumers understand product and systems choices they make.

SPASA Australia has an industry and consumer facing certification scheme called [Climate Care Certified](#) that is used as the benchmark to deliver courses to address the concerns about Energy and Water Sustainable Solutions.



CPD – INDUSTRY RELEVANT SCHEMES

SPASA Australia delivers CPD for both voluntary and mandatory schemes. Industry relevant CPD schemes in Australia include:

QLD:	(QBCC CPD Scheme – WIP) - Mandatory for all license holders. <i>SPASA Australia sits on the QBCC Safety Skill Working Group who are the architects of the pending QBCC CPD program. The scheme is likely to be finalised and implemented in early 2021.</i>
QLD:	(QBCC CPD Scheme): Mandatory for Pool Safety Inspectors <i>SPASA Australia offers CPD under this scheme.</i>
NSW:	(Fair Trading CPD Scheme): Mandatory for Builders & Pool Builders <i>SPASA Australia offers CPD under this scheme.</i>
NSW:	(Fair Trading CPD Scheme): Mandatory for E1 Pool Certifiers <i>SPASA Australia has hosted CPD under this scheme.</i>
TAS:	(CBOS CPD Scheme): Mandatory for various Building Categories <i>SPASA Australia offers CPD under this scheme.</i>
AUS:	(SPASA Australia CPD Scheme): Voluntary for all members

5. Do you support Option 1? Why or why not?

Option 1: Maintain the status quo

This option would not introduce any mandatory CPD requirements for building and plumbing practitioners. Practitioners may continue to voluntarily participate in CPD provided by their industry association or other means.

Voluntary CPD schemes run by peak industry bodies for members are central to an association's key pillars, to lift the professionalism and technical knowledge of the industry.

While peak industry bodies will always make available education and training opportunities to its members and broader industries, it is difficult to impose ongoing training when there is no mandated requirement or deterrent for not completing CPD. However, it is possible that CPD can be linked to a licensing and registration outcomes, for example a builder or pool builder will not be eligible to renew their licence or registration if the required CPD is not completed.

A voluntary CPD scheme does not place prescriptive requirements on licensees and practitioners to participate. This has the advantage of ensuring buy-in by those that do engage in CPD, rather than a system where professionals are attending due to obligation, with risk of them having limited motivation to learn.

Moreover, a Voluntary CPD scheme is only effective if it can attract a significant base of licensees and practitioners in participation, and this means making clear benefits of involvement.

Even though Voluntary CPD Schemes play an important role in the ongoing continuing professional development of registered and licensed practitioners, the construction industry is heavily compliance driven, and therefore an opt-in voluntary CPD requirement is hardly suitable.

6. What do you consider to be the key risks and benefits of Option 1?

Covered in Question 5

7. Do you have any other comments about Option 1?

No.

8. Do you support Option 2? Why or why not?

Option 2: Introduce CPD requirements with no compulsory subjects

This option would introduce mandatory CPD for all building and plumbing practitioners but would allow subjects to be selected by practitioners based on self-identified learning needs.

SPASA Australia's **supports OPTION 2.**

The introduction of **Mandatory CPD with no compulsory subjects** may be seen as an infringement of personal or professional independence, however, if the programme is administered by a peak industry body, it can be seen as a reasonable extension of that association's duty and central to its role.

SPASA Australia's observation from other regions is that peak industry bodies can gather intelligence from members (and the broader industry) and move more quickly than regulators to address workmanship concerns and proactively address industry wide issues before they escalate.

Additionally, improved regulatory mechanisms may assist in identifying reoccurring compliance issues that could feed into peak industry bodies CPD program. That way identified non-compliances are addressed by the industry for industry.

The adoption of OPTION 2 also allows for peak industry bodies to better provide “*targeted learning on topics of genuine industry relevance to help improve the competency of registered and licensed practitioners*”.

In SPASA Australia’s experience, members have recognised that they are best placed to identify deficiencies in their skill set and are eager to select topics that will address knowledge gaps.

OPTION 2 also assures that consumers, government, and regulators that a certain level of competence is required for registered and licensed practitioners to continue to practice in their area of expertise.

Mandatory CPD under OPTION 2 confirms there is a measurement in place allowing for skills to be updated, refreshed, and monitored on an ongoing basis and that registered and licensed practitioners are kept abreast with the latest industry, technical and other developments relevant to a sector.

Accordingly, if a CPD mandatory scheme is implemented in a way that is accessible, flexible, user-friendly, and low cost, it then presents as a valuable and practical accountability tool. A mandatory CPD program delivered under OPTION 2, confirms that registered and licensed practitioners are engaged in a program of ongoing learning and development

Note: OPTION 2 is not dissimilar to the current mandatory CPD Scheme for builders and pool builders in New South Wales and Tasmania where compulsory CPD activities are relevant to broad “Topic Areas” as identified through industry specific complaints (not one-size-fits-all approach) and in consultation with peak industry bodies. This way registered and licensed practitioners have a greater choice of undertaking CPD in relevant and useful subject areas.

9. Which proposal do you prefer?

- (a) prescribing general CPD subjects through regulations; or**
- (b) not prescribing any CPD subjects through regulations, and instead leave the selection of courses entirely to the discretion of the practitioner?**

SPASA Australia **supports proposal (b).**

More legislation is not always the answer. Also, legislating CPD subjects through regulations does not always equate to sound CPD delivery or good learning outcomes.

Also see response under Question 8.

10. If you prefer prescribing general CPD subjects, do you agree with the proposed subject list? What other subjects do you think should be prescribed? Please provide reasons.

The list provided within the consultation paper is broad based and SPASA Australia would argue it is not reflective and does not address the swimming pool and spa industry.

Refer to Non-compliance concerns raised under Question 1 and 2.

11. Overall, what do you identify as being the key risks or benefits of Option 2?

Benefits of OPTION 2 are covered in Question 8.

Risks associated with OPTION 2 include topics being delivered under the CPD Scheme that may not be targeted, widely promoted, delivered appropriately, and have nil or limited regulatory oversight.

12. Do you have any other comments about Option 2?

No.

13. Would you support Option 3? Why or why not?

Option 3: Introduce CPD requirements with a mixture of compulsory and non-compulsory subjects

This option would introduce mandatory CPD for all building and plumbing practitioners and prescribe

SPASA Australia **does not support OPTION 3.**

There is a distinction between mandatory participation and mandatory learning in the context of CPD.

Just because a compulsory CPD subject is mandated does not automatically mean that it leads to mandated learning.

The introduction of **CPD requirements with a mixture of compulsory and non-compulsory subjects** whilst having some flexibility, the introduction of compulsory subjects may mean that the same material is regurgitated to the same audience time and time again.

OPTION 3 could only work if compulsory CPD activities are relevant to broad “Topic Areas” as identified through industry specific complaints (not one-size-fits-all approach) and in consultation with peak industry bodies. This way registered and licensed practitioners have a greater choice of undertaking CPD in relevant and useful subject areas. This approach is not dissimilar to the current mandatory CPD Scheme for builders and pool builders in New South Wales and Tasmania.

14. Do you support the proposal to prescribe technical compliance as a compulsory subject for all building and plumbing practitioners? Or do you think this should be limited to certain categories/class of building/plumbing practitioner?

SPASA Australia **supports OPTION 2 where subjects are not compulsory** because, forcing registered and licensed practitioners to undertake compulsory subjects under a CPD Program does not necessarily equate to an engaged audience or provide good learning outcomes.

If government proceed with prescribing technical compliance as a compulsory subject, then this should be done under broad concept of “Topic Areas” where specific industries can undertake possible subjects that they feel are necessary to address their professional development. “Technical Topic Area” examples for a swimming pool builder may include: Pool & Spa Hydraulics, Interior Finishes, relevant Australian Standards and NCC references.

15. If technical compliance was a compulsory subject, what formats of learning do you think would be most beneficial for building knowledge and skill? For example, hands-on training, online modules, independent study etc.

Mandatory formats of learning can be counterproductive.

Everyone’s learning style is different. Also, the way someone uses their senses to perceive, process, organise and store information varies.

The three most referred to learning styles are:

Visual learners who learn through images, pictures, diagrams, films and videos or presentations.

Auditory learners who learn best through the process of listening and talking.

Kinesthetic learners who learn by doing.

Note: One person can also have different learning styles.

An “inclusive” approach to CPD should include a range of teaching strategies to meet individual needs, and providing learning experiences that:

- consider differing learning styles or preferences
- recognise the differences among learners
- ensure no one is excluded

16. Do you agree with the proposal to introduce compulsory technical compliance training firstly for building surveyors and gasfitters? If not, why not?

Building surveyors provide independent oversight of buildings and building work throughout the construction process and upon completion of construction to ensure that buildings are safe for use, accessible and energy efficient. ([VBA website reference](#))

As tabled elsewhere in this submission, if government proceed with prescribing technical compliance as a compulsory subject, then this should be done under broad concept of "Topic Areas" where specific industries can undertake possible subjects that they feel is necessary to address their professional development. "Technical Topic Area" examples for Building surveyors may include BCA classifications, construction methods, building components, interaction of systems and services, structural engineering principles and performance-based designs.

17. Do you agree that the courses being developed by the ABCB on the NCC should be compulsory?

No. SPASA Australia's **supports OPTION 2 where subjects are not compulsory** because, forcing registered and licensed practitioners to undertake compulsory subjects under a CPD Program does not necessarily equate to an engaged audience or provide good learning outcomes.

18. If your organisation is a registered training provider, would you be interested in developing other targeted compliance training courses for gasfitting practitioners?

No. Whilst SPASA Australia is a Registered Training Organisation, Gasfitting training is outside our scope of registration.

19. What other subjects do you think should be compulsory? Please provide reasons.

Reasons are tabled throughout this submission.

20. Overall, what do you think are the key benefits and risks of Option 3? Please provide reasons.

Refer to response in Question 13.

21. Do you have any other comments about Option 3?

No.

OTHER MATTERS NOT COVERED IN CONSULATION PAPER

EXPANSION OF CPD PROGRAM

SPASA Australia **strongly believes** that any proposed CPD Scheme should be expanded across **ALL** registered and licensed practitioners (e.g. electricians, carpenters, fencers, tiling, excavation etc).

These registered and licensed classes not only work with consumers directly and more frequently but also sub-contract with other registered and licensed practitioners.

SPASA Australia sees the omission of **ALL** registered and licensed classes as a significant deficiency to the proposed CPD program and allowing an ongoing risk to continue as it does not extend to a "*whole of industry reform*" solution.

Whilst builders and swimming pool builders may employ registered and licensed practitioners to work for them - their exclusion from earning CPD is in fact reducing the effectiveness in what the proposed CPD Scheme is intended to do.

The consultation paper makes the point that "*registration and licensing of building and plumbing practitioners provides a signal to consumers that the person engaged to carry out building or plumbing work has the technical and professional skills necessary for the job. It also provides a mechanism for disciplining individuals who do not conform to minimum practice standards.*"

Without expanding the CPD program to include **ALL** registered and licensed practitioners, consumers are potentially exposed to registered and licensed practitioners who have not been required to undertake CPD and stay up to date.

Additionally, it makes more sense to have **ALL** registered and licensed practitioners undertake CPD and stay updated rather than disciplining them down the track because they did not conform to minimum standards or comply in a specific area.

SPASA Australia **submits** that there is no valid justification to actively exclude other registered and licensed practitioners from the proposed CPD program.

CONTINUING PROFESSIONAL DEVELOPMENT = MORE INFORMED CONTRACTORS, LESS RISK TO CONSUMER & BETTER OUTCOMES

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 Australia **submits** that core units of competency that must be completed within each of the qualifications to fully meet licensing requirements.

This means that that for licensing and registration purposes, anyone wanting to construct a Swimming Pool and Spa should be required to undertake the following:

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

OR

[CPC40110 Certificate IV in Building and Construction qualification](#)

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.

FOR MORE INFORMATION

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