

Continuing Professional Development for Builders and Plumbers

Consultation paper



Acknowledgment

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices.

We are committed to genuinely partner, and meaningfully engage, with Victoria's Traditional Owners and Aboriginal communities to support the protection of Country, the maintenance of spiritual and cultural practices and their broader aspirations in the 21st century and beyond.



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Contents

1. Introduction	2
Purpose of paper	2
Consultation framework.....	2
How to get involved.....	2
2. Continuing professional development	3
2.1 What is continuing professional development (CPD).....	3
2.2 What is the objective of CPD?.....	3
2.3 Authorising environment	3
2.4 How will CPD be introduced?.....	3
3. The nature of the problem	3
3.1 Problem context.....	3
3.2 The problem identified	4
4. Practitioner performance	4
4.1 Introduction	4
4.2 Building practitioner performance.....	4
4.3 Plumbing practitioner performance.....	5
4.4 Cross-sector performance.....	5
5. Options	6
5.1 Introduction	6
5.2 Summary of options	6
5.3 Option 1: Maintain the status quo.....	7
5.4 Option 2: Introduce CPD requirements with no compulsory subjects	8
5.5 Option 3: Introduce CPD requirements with a mixture of compulsory and non-compulsory subjects.....	9
6. Appendix A - Consultation questions	12

1. Introduction

Purpose of paper

This consultation paper outlines high-level options for introducing continuing professional development (CPD) requirements into the Victorian building and plumbing industries.

The purpose of this paper is to seek feedback on how a CPD framework would best be introduced to improve the quality of building and plumbing work carried out by practitioners.

To help guide your feedback, this paper includes specific questions listed in purple boxes. A full list of these questions is in [Appendix A](#). It is not compulsory to respond to every question or to comment on all issues discussed in the paper. Instead, you may wish to provide a general response to the consultation paper which addresses the main ideas presented or complete the CPD survey on the project's Engage Victoria webpage.

Consultation framework

Opportunity to provide feedback on the consultation paper and questions raised will be open from 29 May 2020 24 July 2020.

Following consultation on this paper, the Department of Environment, Water, Land and Planning (DELWP) will develop a Regulatory Impact Statement (RIS) and draft regulations, which will be released for public comment in late-2020. The RIS will consider a range of options for introducing a CPD framework which will incorporate feedback received on this consultation paper.

The RIS will provide an analysis of the costs and benefits of each option and identify a preferred option. The RIS will be accompanied by a draft version of regulations reflecting the preferred policy option in the RIS.

Consultation on the RIS and draft regulations will be the final opportunity for stakeholders and members of the public to comment on the new regulations before they are finalised. It is anticipated that the new regulations will come into operation in 2021 subject to stakeholder feedback on implementation timeframes.

How to get involved

Anyone wishing to provide feedback on the consultation paper may:

- Upload a submission to the project's webpage as a PDF or word attachment via the Engage Victoria website: engage.vic.gov.au/continuing-professional-development-builders-and-plumbers
- Complete the CPD survey on the project's webpage on Engage Victoria
- Email a submission directly to building.policy@delwp.vic.gov.au
- Mail a submission marked:

Attention: Continuing Professional Development Team - Building Division
Level 16, 150 Lonsdale Street, Melbourne Victoria 3003

All submissions will be treated as public documents and may be referenced in further policy development or public documents such as the RIS, unless the submitter has requested that their submission remain confidential or be deidentified.

2. Continuing professional development

2.1 What is continuing professional development (CPD)

CPD is the process of undertaking and recording professional education and training after initial registration or licensing, for the purposes of maintaining and or improving professional skills and knowledge. CPD is a process that is undertaken over the course of one's career and is often a condition of maintaining an authorisation to practice in a given industry.

2.2 What is the objective of CPD?

A key objective of CPD is to ensure that practitioners can demonstrate continued competence for the period they are registered or licensed. The term 'continued competence' is not defined in the *Building Act 1993* (the Act) or associated regulations. For the purposes of policy development, continued competence is taken to mean:

- maintenance of the baseline competency standard – i.e. the knowledge and practical experience requirements for registration or licencing; and
- keeping pace with any technical and legislative changes relevant to the practitioner's scope of work – i.e. changes to the baseline competency standard.

2.3 Authorising environment

Over the past several years, separate amendments have been introduced into the Act that allow the Victorian Building Authority (VBA) to consider whether a building or plumbing practitioner has complied with any prescribed CPD requirements before renewing a registration or licence. The amendments enable the VBA to refuse to renew a registration or licence if a person has not complied with any prescribed CPD requirements and to take disciplinary action for non-compliance.

2.4 How will CPD be introduced?

A CPD framework for building practitioners and the nature of any CPD obligations (including learning content, learning formats and compliance timeframes etc.) will be set in building regulations. Registered building practitioners include building surveyors, building inspectors, quantity surveyors, engineers, draftspersons, project managers, erectors or supervisors of temporary structures, domestic builders and commercial builders.

A CPD framework for plumbers will be set in plumbing regulations. Registered and licensed plumbing practitioners include (but are not limited to) gasfitters, refrigerated air-conditioning mechanics, sprinkler fitters and metal roofers.

3. The nature of the problem

3.1 Problem context

In Victoria, a practitioner's suitability to be registered or licensed as a building or plumbing practitioner is assessed at initial registration or licensing. To be eligible to hold a registration or licence, a person must successfully complete the relevant academic qualifications and practical experience requirements prescribed by the building or plumbing regulations. All plumbers and some categories of building practitioner must also pass a competency exam.

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.

3.2 The problem identified

While initial registration and licensing are important tools for ensuring that individuals entering the regulated system are competent to carry out building or plumbing work, the regulatory framework does not require practitioners to undertake activities aimed at reinforcing and developing their knowledge and skill beyond this initial process.

It is important to ensure that practitioners maintain and develop their competence through ongoing education for two key reasons. Firstly, the knowledge and skill held by a practitioner at initial registration or licensing (i.e. the baseline level of competence) can deteriorate over time. Deterioration may occur if the practitioner specialises in a narrow sector of the plumbing or building industry. As a result of specialisation, the knowledge and skills once held in other areas of work may diminish over time due to infrequent use. Secondly, significant changes affecting the building and plumbing industry, including updates to legislation, professional standards, or the introduction of new products and technologies, may alter the nature of best practice.

In the absence of ongoing participation in activities aimed at enhancing competence, practitioners may develop competency gaps, which can significantly impact their ability to remain at the top of their game and perform their work to compliant standards. Sub-standard building or plumbing work may result in a multitude of harms, including damage to property and financial loss, reputational loss to the practitioner, and negative health and safety outcomes both for practitioners, building occupants and other members of the public.

4. Practitioner performance

4.1 Introduction

This section presents a snapshot of key performance issues identified for building and plumbing practitioners that may be addressed by CPD. It also identifies performance issues relevant to both sectors of the industry. Information contained in this section has been collected through early engagement with stakeholders including the VBA.

4.2 Building practitioner performance

Feedback from stakeholders indicates a high incidence of complaints from consumers concerning non-compliant building work, which may stem from changing standards over time and a failure by practitioners to maintain currency of knowledge. Stakeholders have perceived a failure by practitioners to keep up-to-date with changes to legislation, regulations or other requirements.

Anecdotal information from stakeholders suggests that there is a notable lack of understanding amongst building surveyors in how to properly discharge their responsibilities under the Act. The key issues include determining when protection works are required, how to give effect to directions to fix building work, understanding siting requirements and appropriate management of conflicts of interest. With regard to directions to fix building work, the VBA has advised that a large proportion of directions to fix issued by building surveyors are unenforceable due to errors or incompleteness.

In relation to domestic building work, common areas of non-compliance include:

- waterproofing for balconies and other wet-areas
- foundation movement
- brickwork
- internal and external tiling.

In relation to commercial building work, common areas of non-compliance include:

- fire safety systems

- improper penetration of fire or smoke walls
- combustible cladding
- sustainability and energy efficiency
- disability access.

4.3 Plumbing practitioner performance

Feedback from stakeholders suggests there are significant performance issues relating primarily to three classes of plumbing work; roofing (stormwater) work, drainage work and gasfitting work. The main area of non-compliance in roofing (stormwater) work relates to the installation of box gutters. For drainage work, high non-compliance exists for the installation of pipework to the appropriate gradient. For gasfitting work, there is high non-compliance for the installation of range hoods for kitchen cooktops. Stakeholders also advise that changes in technology mean that gasfitters often have difficulty installing and operating newer gas appliances.

Significant non-compliance issues have also been raised for work on alternative water supply systems, including for recycled water.

4.4 Cross-sector performance

In addition to the specific performance issues identified for building and plumbing practitioners above, cross-sector issues have also been raised. These performance issues have been categorised into three main areas – technical requirements, legislative requirements and business practices.

4.4.1 Technical requirements

There is a consensus amongst stakeholders that there are problems with practitioner understanding of technical requirements under the National Construction Code (NCC), Australian Standards and work requirements prescribed by regulations. A significant gap identified by the VBA for both building and plumbing practitioners is a lack of understanding of the development and documentation of performance solutions. Specific gaps in technical knowledge identified by industry associations relate to design and energy efficiency requirements of the NCC.

The VBA has also advised that a high volume of technical enquiries made by plumbing and building practitioners are to confirm whether they are able to perform specific work activities under their registration or licence.

4.4.2 Legislative requirements

The VBA advise that there are issues regarding compliance with administrative requirements of the Act and regulations. Administrative failures identified include:

- failures to properly complete plumbing compliance certificates and provide insurance details
- failures to comply with obligations to notify the VBA of plumbing works for inspection
- failure to comply with notice requirements relating to the appointment as a relevant building surveyor
- failures by building surveyors to document reasons, to review evidence when issuing a building permit, and to appropriately assess performance solutions.

4.4.3 Business practices

Industry associations have indicated a gap in knowledge regarding business practices that require ongoing training. Specific issues include practitioner understanding of legal and contractual obligations and consumer protections for non-compliant building or plumbing work. Issues identified by the VBA include basics in running a business, maintaining financial viability, domestic building contract obligations and insolvency risks.

Questions for stakeholders

1. Are you aware of any additional areas of poor practitioner performance for builders and plumbers? If so, please describe and provide any evidence if available.
2. Of the performance issues identified, what do you think are the root causes of the non-compliance?
3. Are you aware of any CPD courses already available that target any of the performance issues identified? If so, please specify.
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 raised?

5. Options

5.1 Introduction

This section outlines potential options for introducing CPD requirements for building and plumbing practitioners. The following options are not the only options that may be considered during the RIS and are not intended to limit feedback.

The design and development of a strategic framework for CPD will require consideration of several key framework elements, including:

- volume of learning – how much CPD should be required
- formats of learning – what types of activities should be required, and
- CPD delivery – who should deliver the learning.

These framework elements will be further considered through extensive consultation with key stakeholders following consultation on this paper.

As a starting point for the development of a CPD framework, it is important to firstly identify the nature of the learning that will form part of any CPD requirements. The CPD options considered in this consultation paper therefore focus on possible learning content and approaches for prescribing learning obligations.

5.2 Summary of options

The options considered in this consultation paper are summarised in the table below.

Option	Description
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.
Introduce mandatory CPD 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.

Introduce mandatory CPD and require practitioners to undertake a mixture of compulsory and non-compulsory subjects.	This option would introduce mandatory CPD for all building and plumbing practitioners and prescribe some compulsory CPD subjects.
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5.3 Option 1: Maintain the status quo

This option would not introduce any mandatory CPD requirements for building and plumbing practitioners. A practitioner’s ability to perform building or plumbing work would continue to be assessed at the point of registration or licensing. However, there would be no ongoing checks to confirm practitioners continue to be competent beyond this initial process. Renewal of a registration or licence is based on the same qualification and experience requirements imposed for initial registration or licensing. Therefore, the renewal processes do not provide an opportunity to test continued competency of practitioners, unless mandatory CPD is prescribed.

5.3.1 What is the status quo?

The Act currently provides various tools for addressing problems with practitioner competence. For example, the VBA may require a building practitioner to complete a specified course of training where it finds that a ground exists for taking disciplinary action against the practitioner. In taking disciplinary action against a plumber, the VBA may require the practitioner to pass an exam, complete a specified period of training, or attend a specified course of instruction. It may also require a class or specialised class of plumbing practitioner to successfully pass an exam as a condition of registration or licence renewal. This power was recently exercised in relation to plumbers registered or licensed in the class of gasfitting and specialised class of Type A appliance servicing, who were required to complete a carbon monoxide safety learning module and complete an exam before being eligible for licence or registration renewal.

In Victoria, there are a range of voluntary CPD programs offered by industry associations to their members. For example, CPD programs are already offered for building surveyors, quantity surveyors, building designers, architects, engineers and plumbers. Some of the key educational focuses of these programs are knowledge of relevant laws, standards and codes, business development and occupational health and safety.

The VBA publishes technical information sheets and practice notes on its website for practitioners to access on an as needs basis. Technical information sheets are geared towards providing practitioners with information on any relevant updates to Australian Standards, the NCC, or for providing advice on applying technical work requirements. There are currently 53 information sheets relating to building work and on a range of topics, including design of stormwater drainage systems, applying energy efficiency measures to existing buildings and performance solution procedures and documentation. There are 77 technical solution sheets relating to plumbing work on topics including drainage work, sanitary plumbing, cold and hot water plumbing and recycled water plumbing.

The VBA also conducts seminar roadshows aimed at informing practitioners of changes to technical or regulatory requirements. This was recently undertaken prior to release of the 2019 version of the NCC and for the introduction of the Plumbing Regulations 2018.

5.3.2 Anticipated impacts

The existing regulatory tools under the Act may not be effective in managing problems with practitioner competence for three key reasons.

- (1) A decision to require a practitioner to undertake an exam or undergo further training is contingent upon the VBA having knowledge that the practitioner has breached a particular aspect of the Act for which disciplinary action can be taken. In cases where disciplinary action is taken for non-compliant building or plumbing work, the primary avenues for detecting the

non-compliance in the first instance are through the VBA's risk-based auditing and inspection program or consumer complaints. While these are useful mechanisms for detecting performance issues with individual practitioners, there are many instances where non-compliance would go undetected and any wide-scale competency issues unaddressed.

- (2) There is a general lack of short courses on offer outside of formal qualifications. Because of this, practitioners who are required to undergo further training are sometimes required to complete a unit of competency forming part of a broader qualification which they may have already completed as part of their initial training. This approach is time and resource intensive and may be inefficient in addressing the specific area of non-compliance for which the disciplinary action has been taken.
- (3) While technical information sheets and roadshow seminars are helpful in maintaining and updating practitioner knowledge, this approach may not be an effective learning method for all practitioners. For example, many of the intended benefits of these initiatives may not be realised for individuals who learn most effectively by other means, such as hands-on training. It is also difficult to measure any potential improvements in competence through this approach since practitioners are not required to demonstrate their learning, for example through an exam.

Questions for stakeholders

5. Do you support Option 1? Why or why not?
6. What do you consider to be the key risks and benefits of Option 1?
7. Do you have any other comments about Option 1?

5.4 Option 2: Introduce CPD requirements with no compulsory subjects

5.4.1 Option overview

This option would introduce mandatory CPD requirements for all building and plumbing practitioners. Under this option, practitioners would be required to achieve a prescribed number of CPD points by participating in formal and informal learning activities across a range of different subjects. A key feature of this option is that no compulsory CPD subjects would be prescribed.

This option could be implemented by leaving course selection to the discretion of the practitioner. Practitioners could be required to select courses that are relevant to their scope of work and must ensure selected courses contain significant intellectual or practical content that extends knowledge and skill.

Alternatively, the regulations could prescribe a suite of general CPD subjects. A more structured approach may be desirable for ensuring that practitioners select courses that are relevant for working in the building and plumbing industries. General CPD subjects may include:

- business administration
- contract management
- dispute resolution
- technical compliance
- legislative compliance
- sustainability
- occupational health and safety
- design.

5.4.2 Anticipated impacts

Introducing a mandatory CPD framework will impose a time and cost burden on the industry which is likely to flow on to consumers. Practitioners will be impacted by additional costs associated with paying to attend CPD courses or seminars, and by the time that must be taken to complete CPD requirements. It is anticipated that such costs would be passed on to consumers through higher charges for the provision of services by practitioners.

A mandatory requirement to undertake CPD may lead to lower instances of non-compliant building and plumbing work by ensuring that practitioners are maintaining and developing their professional knowledge and skills. In the absence of mandatory CPD, practitioners may not be adequately incentivised to participate in activities aimed at enhancing competence and expertise. This has significant potential to result in uninformed practitioners providing services in a manner that is not in line with current standards and practices.

A mandatory CPD approach would also align Victoria with other Australian States, including New South Wales and Tasmania, who have introduced CPD requirements for some categories of building practitioner. Further consultation will be undertaken with other jurisdictions to understand the benefits that have been realised through their CPD schemes.

Regarding the particulars of the proposed option, an approach where no compulsory subjects are prescribed may emphasise maximum flexibility for practitioners to select and undertake CPD subjects based on self-identified learning needs. It recognises that individuals may be best placed to identify their own competency gaps and to select subjects that may address particular knowledge deficiencies. However, a CPD framework that leaves the content of training entirely to the discretion of participants may reduce the ability to appropriately address known issues with practitioner performance such as those identified in Section 4 of this paper.

Questions for stakeholders

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

10. Which proposal would 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?

Please provide reasons.

11. If you prefer prescribing general CPD subjects, do you agree with the proposed subject list? What other subjects could be prescribed?

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

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

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

5.5.1 Option overview

This option would introduce mandatory CPD requirements for all building and plumbing practitioners. As with Option 2, practitioners would be required to achieve a prescribed number of CPD points in a range of subjects and activities before the expiry of their registration or licence. A key feature of this option is that the regulations would prescribe some compulsory subjects.

5.5.2 Potential compulsory subjects

To begin with, technical compliance could be prescribed as a compulsory subject. This would require practitioners to undertake targeted training in aspects of the NCC and Australian Standards relevant to their class or category of work.

Technical compliance training has been identified as a possible compulsory subject due to its potential for addressing known problems with the correct interpretation and application of the NCC. It also aligns with recommendations made in recent inquiries into the building industry. For example, the 2018 Building Confidence Report commissioned by the Building Ministers' Forum indicated there are ongoing issues of non-compliance within the building industry linked to an insufficient understanding of the NCC and its revisions.¹ The report noted that misinterpretation or ignorance of NCC requirements is widespread and recommended that all practitioners be required to undertake CPD on the NCC.

The 2019 final report of the Victorian Cladding Taskforce expressed concerns with the prevalence of non-compliance across the building industry, noting that while the Victorian Government has a role to play in detecting non-compliance and enforcing the rules and regulations, responsibility for compliance clearly rests on practitioners who carry out works.² The Victorian Cladding Taskforce also recommended that all practitioners be required to undertake compulsory CPD on the NCC.³

The CPD practitioner survey conducted by DELWP in March 2019 received responses from around 1,500 building and plumbing practitioners. 81 per cent of respondents indicated that compliance with technical standards was a preferred CPD subject.

5.5.3 What practitioners would be required to undertake compulsory subjects?

It is proposed to prescribe technical compliance as a compulsory subject for all building and plumbing practitioners. However, rollout of this requirement would initially commence for building surveyors and for plumbers registered or licensed in the class of gasfitting or specialised class of Type A appliance servicing.

It is proposed to prioritise compulsory technical compliance training for building surveyors due to the pivotal role that they play in the building industry. The discharge of their functions requires a broad and holistic understanding of the NCC and its requirements, and there is therefore a need to ensure that they are kept abreast of any changes to performance requirements and that any knowledge gaps can be appropriately addressed.

It is also proposed to prioritise compulsory technical compliance training for gasfitters. In Victoria, there have been three confirmed fatalities from carbon monoxide (CO) toxicity associated with the use of open flue gas space heaters in the last 10 years. Following one such death in 2017, the Victorian Coroner recommended the Government consider introducing CPD requirements for gasfitters and plumbers. This recommendation was supported in principle by the Victorian Government.

5.5.4 How could this requirement be implemented?

To operationalise this option, it is proposed to leverage existing or upcoming training materials where possible. However, the RIS will consider further potential course offerings in detail.

The Australian Building Codes Board (ABCB) is developing targeted CPD courses for building surveyors, architects, builders, building inspectors, designers/draftspersons, engineers, fire safety

¹ Peter Shergold and Bronwyn Weir "Building Confidence – Improving the effectiveness of compliance and enforcement systems for the building and construction industry" (February 2018), p.18

<https://www.industry.gov.au/sites/default/files/July%202018/document/pdf/building_ministers_forum_expert_assessment_-_building_confidence.pdf?acsf_files_redirect>

² Department of Environment, Land, Water and Planning "Victorian Cladding Taskforce Report from the Co-Chairs" (July 2019) p.39

<https://www.planning.vic.gov.au/_data/assets/pdf_file/0019/426034/DELWP0124_Victorian_Cladding_Taskforce_Final_Report_July_2019_v9.pdf>

³ Ibid., p. 41

practitioners, plumbers and project managers. These courses are aimed at improving understanding and competent use of the NCC.

Release of courses by the ABCB is anticipated to commence with building surveyors in mid-2020, with the remainder of courses for other practitioner categories released in the following 18 months. Due to the timings of course release, it is proposed to prescribe the ABCB's NCC course for building surveyors as a compulsory subject, with the remainder of courses for other practitioners prescribed as compulsory as they become available.

For gasfitters, it is not possible to prescribe any ABCB courses, as requirements for gasfitting work are not covered by the NCC. Instead, as a starting point, it is proposed to require mandatory technical compliance training in CO safety. This has been identified as a potential compulsory course due to the seriousness of potential consequences associated with the use of outdated equipment or techniques in this area. The VBA and some industry associations already have CO safety training modules available which could be prescribed as compulsory under this approach.

5.5.4 Anticipated impacts

The impacts of Option 3 are like those outlined for Option 2.

A key risk of prescribing compulsory subjects is that practitioners may not be as engaged with the learning content compared to if they had chosen subjects themselves, or that training providers are not able or willing to develop appropriate learning content for compulsory courses. However, this approach is likely to achieve an appropriate balance between addressing known problems with practitioner competence, while still allowing practitioners to choose other CPD subjects that are not deemed compulsory but may be an area of personal interest.

Questions for stakeholders

14. Do you support Option 3? Why or why not?
15. 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?
16. 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.
17. Do you agree with the proposal to introduce compulsory technical compliance training firstly for building surveyors and gasfitters? If not, why not?
18. Do you agree that the courses being developed by the ABCB on the NCC should be compulsory? If not, why not?
19. Do you agree that gasfitters should undertake compulsory CPD in CO safety training? If not, why not?
20. If your organisation is a registered training provider, would you be interested in developing other targeted compliance training courses for gasfitting practitioners?
21. What other subjects do you think should be compulsory? Please provide reasons.
22. What do you think are the key benefits and risks of Option 3? Please provide reasons.
23. Do you have any other comments about Option 3?

6. Appendix A - Consultation questions

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.
 2. Of the performance issues identified, what do you think are the root causes of the non-compliance?
 3. Are you aware of any CPD courses already available that target any of the performance issues identified? If so, please specify.
 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?
 5. Do you support Option 1? Why or why not?
 6. What do you consider to be the key risks and benefits of Option1?
 7. Do you have any other comments about Option 1?
 8. Do you support Option 2? Why or why not?
 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?
- Please provide reasons.
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.
 11. Overall, what do you identify as being the key risks or benefits of Option 2?
 12. Do you have any other comments about Option 2?
 13. Would you support Option 3? Why or why not?
 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?
 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.
 16. Do you agree with the proposal to introduce compulsory technical compliance training firstly for building surveyors and gasfitters? If not, why not?
 17. Do you agree that the courses being developed by the ABCB on the NCC should be compulsory?
 18. If your organisation is a registered training provider, would you be interested in developing other targeted compliance training courses for gasfitting practitioners?
 19. What other subjects do you think should be compulsory? Please provide reasons.
 20. Overall, what do you think are the key benefits and risks of Option 3? Please provide reasons.
 21. Do you have any other comments about Option 3?

