30 September 2021

To: Members of the Building Ministers Meeting

The following is a joint statement from the Australian Institute of Architects, the Association of Consulting Architects Australia and the Association of Architecture Schools of Australasia, collectively representing the profession of architecture in Australia.

Architects are a key component of Australia's $100 billion built environment sector and there are around 13,500 architectural businesses in Australia with about 40,000 employees. Approximately 25,000 people in the labour force hold architectural qualifications (Bachelor degree or higher) and architectural services in Australia in 2017-18 had revenue of $6.1 billion and generated $1.1 billion of profit.

The statement is in response to the National Registration Framework as proposed by the Australian Building Codes Board.

NATIONAL REGISTRATION FRAMEWORK

National mutual recognition should be underpinned by a consistent approach to practitioner regulation in each jurisdiction so that equivalent practitioner classes, qualifications, competencies, independent registration processes, ongoing continuing professional development protocols, and scopes of work are readily and easily understood.

On this basis, we support the Australian Building Codes Board's (ABCB) concept of a National Registration Framework (NRF). However, the Australian Institute of Architects (AIA), the Association of Consulting Architects Australia (ACA) and the Association of Architecture Schools of Australasia (AASA) have concerns with regard to the qualifications, experience, and scope of work set out in the draft NRF for Building Designers level 1 – Unlimited Design License.

The overall reform of Australia's construction industry was initiated by the adoption of the Building Confidence Report (BCR) at the Building Ministers' Forum. While the report focussed on compliance and enforcement systems, the underlying reason for the review was the lack of trust by the public that the building and construction industry can deliver safe, compliant, and fit-for-purpose buildings. The reforms therefore aim to increase quality and accountability to the public and protection for consumers, noting that confidence in building quality goes beyond competence of the National Construction Code (NCC) in order to protect consumers and design safety.

However, regulation of the design process is different in its requirements to that of the building process, and its separate regulation is one that the Architecture profession believes is important to retain in order to maintain the reputation and recognition of Australia's high level of design-based technical expertise.

The NRF fails to understand fundamental differences in qualification and regulatory frameworks that are already in place across the Architecture profession, with each State and Territory applying their own registration regimes across multiple government authorities.

The foundational 5-year education of Bachelor plus Master of Architecture that supports qualification pathways towards registration as an Architect in Australia is thorough, robust, internationally recognised, and professionally accredited by a panel of national experts every five years. The National Standard of Competency for Architects 2021 V1.0 provides units of competency from project inception through to the completion of construction phase services. The skills and knowledge developed during this education is superior to the proposed NRF requirements for bachelor-level qualifications for future Building Designers.

We believe that the NRF, in its current form, will provide unintended consequences and will reduce consumer protection and impair international recognition of our skills base by indicating that an Architect and Building Designer (Level 1) are equivalent in terms of their education, skills, experience, ongoing professional development, regulation, and expertise when they are clearly not the same. It is not easy for consumers to understand the difference between a Building Designer and an Architect. By conflating the two professions, the NRF is signalling to the market that the product delivered by the two will be of the same quality.

The table below sets out the differences between the two professions.

Table 1: Registration requirements

	Architect	**Building Designer Level 1**
Qualification	Bachelor degree (3 years f/t) plus Masters degree (2 years f/t)	Bachelor degree (3 years f/t)
Australian Qualifications Framework (AQF)	Level 9	Level 7
National Competency Standards	National Standard of Competency for Architects (NSCA)	None
Experience	3,300 hours of logged, verified, and appraised supervised practice (approx. 3-5 years to achieve)	None NRF propose 3 years
Examination	Architectural Practice Exam (APE), including oral and written examination administered nationally by the Architects Accreditation Council of Australia (AACA)	None
Code of professional Conduct	Yes	None
Ongoing compulsory CPD (audited)	Most States and Territories	None NRF recommends for NCC
International Mutual recognition of registration	Yes, with select countries	No

By State and Territory law, architectural education, accreditation, requisite professional experience, and registration examination is rigorously interconnected across Australia. Without completing all the registration components, a candidate cannot apply for registration as an Architect or provide architectural services as defined under each State and Territory's relevant Act.

Recommendations

In order to address the NRF's stated aspirations, we believe that any new registration process and stated provision of services, as outlined under any new State/Territory legislation, must include the following:

- Competency frameworks that go beyond education qualification and years of experience alone
- Suitable robust independent methods of assessment of education standards against a common set of national competency standards equivalent to the AACA's NSCA
- Recognition of current educational qualifications for Architects (Bachelor of Architecture + Master of Architecture) as exceeding qualification and demonstratable competencies of a Building Designer
- Recognition that any Building Designer, based on Bachelor-level qualification, should not be able to be permitted to provide an unlimited provision of services unless complimented by a Master of Architecture qualification
- National regulatory body responsible for accreditation of building designer qualification providers equivalent to AACA
- Suitable robust and independent methods of assessment of practitioners against standards established by the competency framework
- Strong codes of conduct focussed on consumer protection, with appropriate investigatory powers and sanctions
- Mandated professional indemnity insurance of coverage suited to the work being performed
- Ongoing requirement for Continuing Professional Development (CPD)

We believe that the scope of work for different levels of design practitioner adopt a risk-based approach and determine scopes according to:

- Class, according to the Building Code of Australia
- Levels and size
- Building typology
- Building complexity
- NCC Construction type
- Building Procurement Model

We recommend that:

1. Architects are identified as being able to prepare design documentation, provide design, construction, and supervisory oversight, and provide relevant certifications, such as proposed design declarations, for all building types, categories, and levels of complexity; and

2. Building Designers are identified as providing a limited scope of work unless they can demonstrate equivalent qualifications and experience as a registered Architect.

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