

# **Summary of submissions**

Licensed Building Practitioners scheme: Supervision, licence classes and minimum standards of competence



MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT HĪKINA WHAKATUTUKI

### Introduction

### Background

On 26 April 2021, The Ministry of Business, Innovation and Employment (MBIE) opened consultation on potential issues in the Licensed Building Practitioners (LBP) scheme.

The consultation document asked questions on potential issues within three areas of the scheme:

- Supervision
- Licence classes
- Core competencies and minimum standards for entry.

The aim of the consultation was to test potential issues MBIE was aware of to determine whether these issues were real or not and, if so, to what extent.

The potential issues consulted on were chosen based on feedback received during a wider consultation on issues in the building sector as part of the Building Sector Legislative Reform Programme, which was undertaken in April 2019. The feedback received in that consultation showed support for reform in the LBP scheme. More information was needed, specifically from those who work closest with the scheme, before proposals could be made.

### Who submitted?

MBIE received 140 submissions: 84 written submissions, and 56 online survey submissions via Survey Monkey.<sup>1</sup>

Major submitters included various Building Consent Authorities (Auckland Council, Christchurch City Council, Southland District Council, Wellington City Council, Western Bay of Plenty District Council, Whanganui District Council), Registered Master Builders, Master Plumbers, Gasfitters and Drainlayers NZ, Certified Builders New Zealand, Roofing Association of New Zealand, New Zealand Construction Industry Council, Building Officials Institute of New Zealand, and the Building Practitioners Board.

LBPs were the most reported occupation of submitters, with 49 per cent of submitters identifying as such. This marked a large improvement over the number of submitters who identified as an LBP in the April 2019 consultation.

<sup>&</sup>lt;sup>1</sup> Four of the Survey Monkey responses were blank.

The overall breakdown of the submitters' occupations is as follows:

Table 1: Breakdown of submitter types

Submitter Type	
LBP	69
Non-LBP tradesperson	8
BCA/Building Consent Officer	15
Education/training/skills	4
Designer	13
Engineer	5
Residential Building Owner	7
Commercial Building Owner	2
Other	30
Total	<b>153</b> <sup>2</sup>

### The consultation process

MBIE began consultation on 26 April 2021, with submissions open for a total of seven weeks. We asked 26 questions in our consultation document.

The consultation was advertised online, as well as on radio advertisements.

#### How this document works

This document is grouped in three main areas based on the structure of the consultation document.

The three areas are:

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- Supervision
  - Licence classes
    - Classes
      - $\circ \quad \text{Areas of practice} \quad$
      - $\circ$  Site licence
      - Licence structure
- Core competencies and minimum standards

<sup>&</sup>lt;sup>2</sup> Note: submitters could identify as more than one option.

#### Meaning of terms used

This document is designed to give the reader a general idea of the numbers of submitters making similar comments throughout the document. The numerical values of terms used are outlined in Table 2 below.

Term	Number of submissions
One / single / a	1
A few / a couple	2-3
Several / a number of	4 – 7
Group or a collection	8 – 15
Some, many, or a large number	Up to 50% of submitters
Most or the majority	Over 50% of submitters

#### Disclaimer

Some, but not all, submissions have been directly quoted in this document. All submitters were notified that their submission or the content included in the summary or other report could be made public. Making a submission was considered consent to making the submission public, unless the submitter clearly specified otherwise.

### Part 1: Supervision

MBIE asked five questions on supervision within the LBP scheme. These questions aimed to confirm whether there were issues with the way it was being conducted, and whether all LBPs should be able to supervise restricted building work.

Question 1: Do you believe that supervision is currently working as it should be? Why/why not? If not, what do you think can be done to improve it?

After the April 2019 consultation, MBIE received feedback suggesting that supervision of restricted building work was not being carried out to a good standard.



# Some submitters felt that supervision of restricted building work was being handled poorly due to LBPs taking on more work than they could handle.

Individual, LBP (5)

There are too few LBPs to go around and cover the ground in our over-stretched industry.

Organisation, BCA/Building Consent Officer (88)

Council has found inexperienced LBPs supervise a large number of construction workers and others on multi-unit sites.... It is now becoming commonplace to have one supervisor overseeing 10-20 workers onsite.

Individual, LBP (105)

I have been on large jobs and have seen one LBP overseeing 20 builders. That's not going to work.

### Some submitters felt that supervision was too subjective, and therefore different LBPs had different ideas on how it should look.

Organisation, Other (42)

The level of supervision required under the current scheme is subjective and lacks clear guidance on the level of supervision required at site/task level. Placing the onus on the LBP to determine the level and mode of supervision may not be placing the risk where it can best be managed as the LBP may be an employee.

Individual, LBP (94)

Supervision is not necessarily working correctly at the moment. The requirements on what constitutes supervision need to be demonstrated through examples being provided by MBIE.... This could potentially be alleviated though the implementation of a peer review checklist that could then be submitted with a memorandum of design. This checklist could potentially mirror a territorial authority's consent processing checklist

Question 2: Do you believe that remote supervision is being carried out correctly? Are you aware of instances of it being abused? If so, what can be done to remove the risks that can occur when remote supervision is abused?

Question 2 sought feedback on whether remote supervision was being carried out to a good enough standard, or whether it was being abused by people.



# Many submitters felt that supervision was not possible to do properly without being on site, and that remote supervision was a way of cutting corners.

Individual, LBP (23)

You need to go on site to check the workmanship and materials being used.

#### Organisation, Other (42)

Anecdotally, we understand remote supervision is often not carried out to an appropriate standard, and there is inappropriate/unauthorised use of LBP licence numbers by other practitioners.

#### Individual, LBP (86)

Remote supervision is not being carried out correctly as many of them just giving out LBP numbers and they might never been to the site and don't know what's going on. An LBP attending the site inspection will help this problem.

### Question 3: Do you believe that supervision of specialised non-LBPs is a problem within the sector? If so, what are the problems it causes?

Some building practitioners only specialise in a certain aspect of a licence class, and as a result do not apply for a licence. Therefore, whenever they undertake restricted building work, they need to be supervised by an LBP. Question 3 asked whether the supervision of these practitioners was causing problems in the sector.

## Some submitters felt that problems with poor quality restricted building work were caused by inexperienced supervisors not identifying poor workmanship.

Organisation, Other (55)

Some specialised work is not covered by LBP licence and supervising LBPs are unlikely to have the specialised knowledge to manage the quality assurance of this work.

Organisation, Other (44)

Those supervising won't have the expertise needed to provide assurance this work is done properly.

One submitter said that he upskilled his own staff so they had the technical knowledge to supervise these practitioners.

Question 4: Do you believe that supervision should only be available to certain LBPs? If so, what criteria should be used to decide if an LBP can supervise restricted building work?

Question 4 asked whether only some LBPs should be able to carry out supervision of restricted building work, in response to conjecture around some inexperienced LBPs undertaking poor supervision.

#### **CLASSIFICATION TEXT**



# Many submitters felt that only those with a Site licence should be able to supervise restricted building work.

Individual, LBP (23)

LBP with Site licence.

Organisation, BCA/Building Consent Officer (51)

This where the Site Licence was designed to have the most effect. The Site Licence could supervise all LBPs and collate information at the end of projects. This would also enable more efficient project management.

#### Organisation, BCA/Building Consent Officer (62)

The Site licence could have the mechanism to allow for supervision. However for this to work supervision should be for the project, rather than just the build components.

### Many submitters thought a tiered licence structure would make sure only the most able LBPs were supervising restricted building work.

Individual, LBP, Residential Building Owner, Education/training/skills (29)

Yes, having a tiered system especially in Carpentry would mean that less experienced LBPs would not be expected to supervise outside their competency and experience while they worked their way up.

#### Organisation, Other (38)

It is suggested that a separate Supervisor threshold be implemented with entry requirements that could include the following: core trade competencies (where they exist i.e. electrical and plumbing certification) and/or Site Licence Class levels of qualification, an experience component, and LBP Trade Licence requirements.

#### Individual, LBP (56)

They should be qualified with a certain level of experience/track record.

*Question 5: Do you believe that the ability to supervise restricted building work needs to be addressed within the competencies?* 

Question 5 asked whether the ability to supervise is something that should be tested of those who wish to enter the scheme.

# Most submitters agreed that supervision needed to be addressed in the core competencies to ensure that those licensed in the scheme were able to supervise competently.

Organisation, Other (57)

Yes. Due to the nature of the supervision role, it warrants a higher standard of competence and criteria.

Organisation, BCA/Building Consent Officer (62)

Yes. The skills necessary to carry out supervision together with the expectations around supervision should form part of the competencies and should be assessed.

Organisation, BCA/Building Consent Officer (71)

Yes, it should be its own competency and should be stipulated on the website.

Individual, LBP (141)

Absolutely it should. The more competent you are the more you should be able to supervise.

### Part 2: Licence Classes

The consultation asked a total of sixteen questions about the licence classes in the LBP scheme. They have been broken down into four main areas:

- Classes
- Areas of practice
- Site licence
- Licence structure

### Classes (6-9)

Questions 6 to 9 asked for feedback on the licence classes themselves, including whether any should be added or removed, and whether specialised non-LBPs<sup>3</sup> could be better captured by the scheme.

*Question 6: Do you believe that specialised professions where members are not LBPs are being adequately monitored and operating correctly under the current scheme?* 

Question 6 sought to determine whether specialised non-LBPs were escaping being regulated by not being fully licensed. Just over half of submitters felt that these specialised non-LBPs were not being captured correctly by the scheme.



### A number of submitters felt that subpar supervision from LBPs meant that poor work by specialised non-LBPs' was not being picked up on.

Organisation, Other (55)

Further requirements for supervision are required for any task that penetrates the external envelope, may affect structural integrity, or may affect fire resistance.

<sup>&</sup>lt;sup>3</sup> Specialised non-LBPs are practitioners who specialise in work that is considered restricted building work, but are not licensed in the rest of the relevant class. They therefore require an LBP to supervise them when they undertake restricted building work.

#### Organisation, Other (43)

No, we believe supervisors need to lift their game and this can be done through training or micro-credentials and can be reinforced through mandatory CPD requirements.

#### Organisation, BCA/Building Consent Officer (67)

No, unless these professional organisations carry out ongoing supervision/auditing of their members.

### Many submitters felt specialised non-LBPs could be regulated by adding additional trades to the LBP scheme, either singularly or as a group.

Individual, Other (40)

HVAC design build / install needs regulation.

#### Individual, Non-LBP Tradesperson (45)

Using stonemasonry as an example, there are many excellent stonemasons who are members of the NZSMA and who hold current qualifications (Level 4 or 5 NZ Certificate in Stonemasonry). These stonemasons are already acting as if they are part of the scheme. However, there are many others who are not. Introducing stonemasonry into the scheme as a separate licence class, would provide a mechanism to raise standards of work and protect consumers from substandard work.

#### Individual, LBP (113)

I think there should be LBP of some sort for most sub-trades. Puts the accountability on that person to own the work they are doing, it is their specialty why should the main contractor take their responsibility when we can't "tell" them how to do their job.

One submitter proposed that the onus for ensuring the quality of work needed to be placed on these professions' professional organisations and industry bodies.

Question 7: Do you believe any of the current classes no longer need to be covered by the LBP scheme? If so, why?

As part of addressing the changing face of the sector, Question 7 asked whether any of the current classes had become redundant and were no longer needed.

#### The majority of submitters did not want any of the current classes removed.

Organisation, BCA/Building Consent Officer (77)

No they are all required and more need to be added.

Individual, LBP (122)

The LBP classes, by and large cover RBW that is not covered by other professions or by product application licenses. I don't think any classes are no longer needed.

*Question 8: Do you think the classes can be expanded to include specialised professions, without resorting to adding a class for every profession? If so, how?* 

Question 8 asked whether there was a way to add these specialised non-LBPs could be covered by the scheme, without resorting to adding a class for each different profession. Just over half

of submitters felt that these professions needed to be covered by the scheme, but there was no consensus on how to do so.

## Some submitters suggested adding some areas where many defects were found, and therefore requiring regulation, as add-ons to existing classes.

Individual, LBP, Other (19)

Yes better to have add-ons for existing classes, especially for design classes.... Then add extras that are more relevant to their expertise and experience.

Individual, LBP, Residential Building Owner, Commercial Building Owner (30)

Yes – but these should only be an optional 'add-on' in order to increase the approved competencies of the licence holder.

Organisation, Other (38)

Expansion of existing classes would be a simpler approach vs. developing new classes. Engagement with those, suppliers, applicators/installers, and industry bodies that operate within, or represent those that operate within the specific areas of practice, should be undertaken, so as to ascertain how this is best achieved.

### A couple of submitters felt that expanding new classes to cover more professions was the best approach.

Organisation, Other (55)

Expanding existing classes, for example including waterproofing/tanking into roofing, would require specific engagement with those affected industries.

One submitter felt that the issue could be solved with better supervision from LBPs, while another felt that trying to expand the scheme to cover these people would be government overreach.

### *Question 9: What areas do you believe need to be covered by the LBP scheme that aren't already? Why?*

This question asked whether there could be any new trades that were not covered by the scheme currently, in a bid to determine whether there are any high-risk areas that are currently being overlooked. The majority of submitters felt that there was at least one area that could be expanded into.

#### **CLASSIFICATION TEXT**



## A group of submitters advocated for the inclusion of stonemasonry into the LBP scheme, based off of previous consultation.

Organisation, Non-LBP Tradesperson (53)

Stonemasonry. See the results of the MBIE consultation on stonemasonry entering the scheme with its own licence class 2019 in which 90%+ of the NZ construction industry via the bodies and associations that represent it agreed that stonemasonry should be included in the scheme under a separate licence class.

Organisation, BCA/Building Consent Officer (77)

Stonemasonry this has been covered by earlier submissions and we understand the professional association has robust standards and COPs to add value to the assessment criteria.

#### Some submitters wanted tanking and waterproofing added to the LBP scheme.

Individual, LBP, Other (6)

Tanking. Tanking is when a membrane layer is applied to concrete walls and floors below ground. These particular applications are not covered under roofing the way the LBP scheme works at the moment. This also can apply to liquid membrane. Installing these products on walls (tanking) once the backfill has gone in cannot be repaired in most cases, it should be covered as part of a membrane licence.

#### Organisation, Other (38)

Those that are involved in building elements that contribute to the structural integrity of a building, fire protection, or weather tightness.

#### Individual, LBP (94)

Waterproofing / Tanking: This is an integral part of the performance of a building and should be covered. Currently it is reliant on councils gathering producer statements, warranties and the like.

#### Other submitters suggested that modular component installers should be added.

Organisation, BCA/Building Consent Officer (51)

Prefabrication and modular construction areas.

Organisation, BCA/Building Consent Officer (77)

Prefabrication, and Modular erection.

One or two submitters submitted in favour of various classes that could be added, including HVAC installers, retrofit window installers, insulation installers, and plasterboard installers.

### Areas of Practice (10-12)

Questions 10-12 focussed on the areas of practice in the scheme. The questions asked if LBPs were working in areas they were not competent in and whether it should be changed, and whether the unique structure for the Design and Site classes needed changing.

Question 10: Are you aware of instances where LBPs are operating in Areas of Practice within their licence class but outside of their competence level?



When an LBP becomes licensed in a class, they are required to demonstrate they are competent in one or more areas of practice in that class. They are not required to be competent in all the areas of practice for a class, and are not limited to working within only the areas designated on their licence. An LBP may work in other areas within their licence class, provided they do not work outside of their competency level. Question 10 asked if LBPs were working outside of areas they were licensed in without being competent in that area.

Many submitters felt that there were instances of this, but explanations varied.

Some submitters felt that 'deemed' LBPs such as engineers and architects were doing sub-par work in the areas they were deemed to be licensed in. Individual, LBP, Other (6)

Plumbers can install profiled metal roof and wall cladding under their LBP licence / plumbers registration.

#### Individual, LBP, Other (19)

Yes I see many designs done by architect (and some high category designers based on qualifications only) with unlimited design class's, do designs that are not code or act compliant, but seemingly focussed on making a name for themselves with a pretty building. I also see many designs done by engineers who also have unlimited design class's, yet don't know most of the code clauses that are affected by their design yet only sign off B1. They and too many assume they know what they are doing, which is not the case in many cases. Both of these issues I see regularly in many claims that I provide expert witness for relating to legislative, code and performance by all parties. All issues have come from too many assumptions by too many that these highly qualified people know what they are doing because they are unlimited in their performance based on the LBP system, so little checking is performed and raised as potential issues at design stage and construction stage.

#### Organisation, BCA/Building Consent Officer (77)

Yes - Design is one of the main areas where this occurs and particularly is a flow on effect from the grandfathering of licence classes for Design to registered architects and engineers.

#### Individual, LBP (108)

Yes a lot of LBPs have been licensed without any experience or skill for example an architect holding a design license and also carpentry license whilst he has not built any house or did any courses in building.

# Some submitters saw LBPs producing poor work in areas of practice they were not licensed in in the Design class, with a reliance on requests for further information from building consent authorities.

Organisation, BCA/Building Consent Officer (62)

Yes, we have a number of Design 1 or 2 designers doing extremely complex designs that rely on the council and the RFI process to get their work right.

#### Individual, Designer, Other (70)

Yes. I commonly see Design LBPs undertaking work beyond their licence level. But whether they are outside their competence is a matter for debate in each case. Design 1 LBPs should be restricted to very basic work. Some Design 2 LBPs are carrying out quite complex work, but are not eligible for Design 3 because they never undertake contract administration.

Some Design 2 LBPs seem to think that they can call themselves project managers: particularly on non-RBW. This makes a nonsense of the LBP scheme: if a Design 2 can carry out project management or contract administration on non-RBW when they cannot do so on RBW, then they are communicating to the public that they have the required competencies (i.e. Design 3) when in fact they have not, or at least have not been validated by the LBP intake process.

Question 11: Do you believe that the way Areas of Practice operate should be amended? If so, how? What impact do you think amending the Area of Practice structure may have?

Question 11 asked if the ability for LBPs to work in other areas of practice should be changed. While just under half wanted to see change, many referred to different parts of the scheme that could be addressed instead.

### A group of submitters recommended updating the areas of practice to reflect the modern-day industry.

Organisation, Other (55)

The Areas of Practice need to be reviewed against current knowledge and checked against complaints received to ascertain where any gaps are.

Organisation, Other (57)

We support reviewing the Areas of Practice against current standards and competencies to identify gaps or areas where industry practice has changed. We are supportive of the Areas of Practice being brought up to today's standards and any identified gaps being addressed.

Organisation, Non-LBP Tradesperson, Other (72)

Whilst we have no particular view on the way that areas of practice operates should be amended, it is important for MBIE to review them against current knowledge and any relevant complaints. It should be made clear what range of work a practitioner can complete when they gain their LBP license. It will be important if the Areas of Practise are amended to carry out external audits to ensure that the system works as intended.

Others provided different methods altogether of changing the areas of practice.

Individual, LBP, Residential Building Owner, Commercial Building Owner (30)

Yes. I believe that the licence classes need to remain in place, but the areas of practice within these classes should cover only the basic requirements for that class, but have optional 'add-ons'. This will allow the licence holder to increase their areas of practice within that licence class – providing they can demonstrate an adequate level of competence.

Individual, LBP (92)

Stay with the classes but introduce levels of class to be an LBP is a big item with many complexities usually only learnt through experience.

### *Question 12: What is your opinion on the way Site and Design areas of practice are separated (i.e. by building complexity)? Do you think this needs to change?*

Unlike the other classes, Design and Site licences are split by building complexity (numbered 1 to 3), however like the other classes an LBP licensed in one area may operate in another, provided they are competent.

Almost half of submitters did not see the need for massive change in the areas of practice structure, submitting that it was working well in its current form. Individual, LBP (13)

I don't think anything needs to change.

Individual, LBP, Designer, Residential Building Owner (34)

I think it makes sense to have design separated by building complexity. As more complex buildings require more expertise, but also have more risk. I do not think that contract administration should be required as part of the Design 2 level. As this type of work is not common in all areas of NZ. Many kiwis still have the do-it-oneself mentality and want to manage their own builds.

Organisation, Other (38)

Classification by building complexity is a reasonable approach, no change suggested.

Individual, LBP (122)

Both areas are separated along a level of competency which is where we should be. The Site licences should remain and should be assigned future areas of practice that are not currently in the scheme.

### Some submitters did think that the areas of practice structure needed change, mainly due to the risks involved.

Individual, LBP (4)

Site could be divided into commercial and residential. There is a big difference between running a house build and running an apartment block.

Organisation, BCA/Building Consent Officer (67)

Too open and prone to exploitation.

Individual, LBP (124)

Design level 1 and 2 are very similar so they could be combined. The principles of each areas are the same.

#### Site licence (13-18)

Questions 13-18 asked about the Site licence. Initially envisioned as a vital part of the LBP scheme that would monitor the important area where trades met on a building, there has been a perception that the licence has not lived up to its potential and needs overhauling. This is due to the fact there is no regulatory requirement for anyone to hold a Site licence, as the work a licence holder can undertake does not fall under restricted building work.

Question 13: Do you believe the building sector in New Zealand still needs the Site licence class?

Question 13 asked whether New Zealand could do away with the Site licence if it truly was no longer of use.

#### **CLASSIFICATION TEXT**



## Most submitters thought that the Site licence class is still very much needed, but could use vital change to be relevant.

Individual, LBP, Engineer (28)

Yes, it needs to play a central role in RBW.

Individual, LBP, Designer, Engineer, Residential Building Owner (37)

Yes, it should be the most important. It has to cover off on the work of other LBPs, not be subservient to them, and also the work of specialist trades to ensure the restricted building work is NZ Building Code compliant. This does not mean supervising the actual performance and content of the specialist trades work, just the effect of this work on the whole construction.

#### Organisation, Other (38)

Yes. In addition, the qualification thresholds for the three Site categories (1, 2, 3) look about right. The NZIOB's view is that higher competency of the site manager will mitigate risk for the main contractor, though it is the main contractor (not the individual) who should be liable for project risk.

#### Organisation, Other (43)

The Site Licence class is set at a higher level of competence than other classes and is therefore useful for supervision. There is still the need for responsibility/risk to be held at a business level, requiring a licencing regime for businesses completing Restricted Building Work.

#### Organisation, BCA/Building Consent Officer (77)

Yes, we believe this class still is valid but needs to have very clear description of the roles which must be performed by holders of this class. Consumers rely upon this set of licences to give them confidence in the overall job. Therefore, the reliance upon the holder to perform the overarching quality role, ensuring that the holder manages the

interaction of all other licence classes involved in the project is important. It is akin to the role of a project manager and should be assessed in that manner.

Organisation, BCA/Building Consent Officer (88)

Yes, but this does need to be looked at and improvements made to ensure the original reasoning for them is being met.

Approximately one-fifth of submitters did not think the Site licence was needed any more, citing the perceived lack of use the class currently had.

*Question 14: Can the Site licence be amended to make it more useful or make the purpose clearer? If so, how?* 

Question 14 asked how the Site licence could be improved. There was no clear consensus from submitters, but many ideas.

### A collection of submitters wanted to bring back the clerk of works model to replace the Site licence class.

Individual (14)

I see a conflict with Site, Carpentry and Foundation Classes. A "Carpenter" as a Tradesman did the Site set out, excavation, profiling, boxing (formwork) placing the reinforcing and pouring Concrete. Now most jobs in Auckland have subcontractors to do the Foundations and or Rib-raft Slabs. So the "Site" category seems an anomaly, who or what is this person, what is their Trade and what are their skills? A Site Manager is employed by a "Building Company" that are not actually Builders. For instance QS set up as a Building Company employing all sub-contractors on "Labour Only" terms. The person missing in all these situations is a "Clerk of Works" who was the Owner's representative on site, to ensure the correct materials, quality and workmanship took place in the building process.

Individual, Other (40)

Possibly by adopting a 'clerk of works' or 'building surveyor' class as well for sign off on category 2 & 3 buildings

### Others called for greater responsibility to be added to the Site licence class, to help give it a more formal role in the scheme.

Individual, BCA/Building Consent Officer, LBP (73)

Supervision should only be supervised in the field that the LBP licence that they have achieved. I do believe Site Manager LBP 1 to 3 should be able to supervise construction work or design.

Organisation, BCA/Building Consent Officer (51)

Yes, it should be reinstated for the purpose it was originally designed for and that was to overseer projects and collate all other LBP Record of Works to submit to owners/councils at project end.

Organisation, Other (43)

We see an urgent need for supervision credentialing in both passive fire installation, solid fuel burner installation, specialist window installation, membrane waterproofing and earth building supervision. This credentialing for Site Licences ensures much

needed knowledge in these high risk and safety areas while not necessarily having the detail knowledge and practice needs of an LBP Trade Licence.

Individual, LBP (87)

It needs to be tailored to for more complex house builds / commercial construction management.

*Question 15: Have you previously held a Site licence but chosen not to continue with it? If so, why?* 

In the wake of decreasing Site licence numbers, Question 15 asked for reasons why, if applicable, LBPs had discontinued with theirs. Most submitters had not discontinued with their Site licence.

A few submitters had ended or paused their Site licence, but no reasons were given. Individual, LBP (134)

I will leave the industry soon. I hold S2 and you just make working life harder and harder.

Individual, LBP (41)

I will drop my site license at my next renewal.

Individual, Education/Training/Skills (109)

Yes I put mine on hold, but have reinstated it, as I'm doing some work that requires it.

Question 16: For current Site Licence holders: How do you make your licence worthwhile? What methods do you use to promote it?

In a bid to understand different methods that the Site licence could be made more useful, Question 16 asked how licence holders utilised their licence to the fullest extent.

# A collection of LBPs responded with different ways that they promote their Site licence with the general consensus being that they used it as part of business promotion.

Individual, LBP, Residential Building Owner, Education/training/skills (29)

I currently and proudly hold a Site 2 Licence to demonstrate to the public my competency in supervision and project management. I accept it is a licence without any power and as above, I have been waiting since 2010 for something to be enacted for it.

Individual, LBP, Other (90)

Promote it on business cards and email signatures.

Individual, LBP (122)

I use the Site license for marketing/promotional purposes. I add it to my listed professional qualifications.

A few submitters didn't promote their Site licence, as they felt that it held no value. Individual, Other (106)

I don't promote it, as it has no value at present.

Individual, LBP (87)

It carries little value other than proves experience and mana.

Individual, LBP (131)

I don't bother, not a lot of clients care about it. I have it displayed at my email footer.

One submitter felt that it promoted itself sufficiently.

*Question 17: Are there ways that restricted building work and supervision can be added to the Site Licence? If so, how?* 

One of the main complaints about the Site licence that came up in the April 2019 consultation was the inability for a licence holder to undertake or supervise restricted building work. Question 17 asked whether there was any way it could be added to the class.

# A few submitters suggested that supervision of restricted building work should only be completed by those with a Site licence.

Individual, LBP (41)

Yes, restrict supervision to Site holders only.

Organisation, Other (43)

Amend Restricted Building Work (RBW) to make site supervision mandated and part of RBW which, therefore, makes site licence mandatory.

Organisation, Other (61)

Yes, perhaps through a Supervision qualification.

#### A group of submitters said that there was no way that restricted building work could be added to the Site licence class.

Organisation, Non-LBP Tradesperson, Other (72)

Not that we are aware of.

Organisation, BCA/Building Consent Officer (77)

Supervision cannot be added in our opinion because it relies upon skills to be able to supervise in those particular areas of expertise.

#### A couple of submitters suggested that an aspect of quality control, such as final signoff on overall work, could be added to the Site licence class in lieu of restricted building work.

Individual, LBP, Engineer (28)

Yes, for example, site need to recheck the work before building inspection.

Individual, LBP (96)

I think it is imperative that Site1 and especially Site2 LBPs are able to sign off/reject any building works. Having this qualification points to experience in the trade. This is not to say we would be signing off the builders work. They would still be liable for their own works.

#### Individual, LBP (122)

In its inception, the Site licence was planned to be used for ways to reduce on site BCA inspections. With the proliferation of digital site inspection tools we can start looking at a way of engaging Site license holders in some inspections activity without treading on the BCAs risk averse tender toes and or remote supervision.

### *Question 18: In what ways can responsibility be added to the class without the level of risk to the holder becoming too high?*

A common theme in the April 2019 consultation was a fear of disproportionately increased liability when increasing responsibility. Question 18 sought ideas on how this could be avoided when adding to the Site licence.

### Some submitters submitted that by becoming an LBP, they had to accept liability for their work.

Individual, LBP (5)

As an LBP he or she already has to carry the responsibility.

#### Individual, LBP, Residential Building Owner, Education/training/skills (29)

I have run my own construction company for 38 years and I have lived with risk and liability throughout. If you licensed companies the only additional responsibility would be to the LBP Board for possible disciplinary hearings if a complaint was laid. Any possible penalty from the LBP Board would pale in comparison to the penalties imposed by WorkSafe or from court action for commercial disputes .These are the realities of running a construction business. The Site licence becoming a "company licence "would mean the public have a forum to complain about bad behaviour without great added responsibilities to companies.

#### Organisation, Other (43)

There needs to be clarity about what responsibility is. Responsibility of the site LBP and various trades LBPs, in particular, around the interfaces and junctions between Classes. This will ensure a well-documented and understood list of responsibilities and accountabilities that should avoid poor behaviour and building failures.

#### Organisation, BCA/Building Consent Officer (88)

We believe the person undertaking the work should be responsible for their part in the process i.e. -not focusing on diverting liability elsewhere. Ultimately, they are in business providing design and setting specifications or undertaking the work on site. No one is forcing them to take on responsibility where it has not already sat prior. When the scheme was released, the messaging from MBIE was that the liability was already there for the person doing the work or engaged to do the work, and it had not increased because of licencing. The purpose was so that owners could have confidence that if they were engaging an LBP who would be competent to undertake that type of work.

#### Individual, Non-LBP Tradesperson (89)

As long as the holder has followed correct practices and guidelines risk will be minimal.

Individual, Other (106)

The level of risk is not the issue, as competent LPBs stand by all they do as part of their profession.

A group of submitters suggested that some accountability for compliant work and the liability resulting from it could be placed with the company or employer instead of the LBP.

Organisation, Other (55)

Risk should be allocated to where it can be managed best, i.e., with the business.

Organisation, Non-LBP Tradesperson, Other (72)

By transferring the management of risk to the business, rather than an individual LBP, as businesses are the most adept vehicles for managing risk.

One submitter suggested making insurance mandatory for all LBPs to cover any failures, while a couple felt that the Government could step up and provide better information and training for Site licence holders.

### Licence Structure (19-21)

The consultation asked three questions on the licence structure of the LBP scheme, including whether those with more experience should be recognised within the scheme, whether the licence should have a tiered structure like other occupational regulation schemes and, if so, how it should look.

### Question 19: Do you believe that the LBP scheme should recognise those who have more experience in the industry? If so, how?

As the scheme currently stands, someone who has recently become licensed has the same rights and responsibilities as every other LBP, regardless of experience and ability. Question 19 sought opinions on whether the scheme should distinguish LBPs based on ability and experience. Seventy per cent of submitters were in favour of the idea.



# The majority of submitters were behind the idea of the LBP scheme operating in a tiered structure that recognised practitioners based on ability.

Individual, LBP, Other (6)

Yes, standard LBP licence should be for people who have completed a trade and has been deemed competent in the area practice. Supervisor's LBP licence, someone who has completed a trade and has been deemed competent in the area of practice and experience as a supervisor / trainer of people with inside their trade.

Individual, LBP, Residential Building Owner, Education/training/skills (29)

By having tiered classes, especially in Carpentry, it would recognise experience in supervision. It just may also encourage young tradespeople to become licenced without fear of having too much responsibility and accountability thrust onto them too early. They could work alone or unsupervised while they accumulate the skills and confidence to move up to the next tier or AOP.

## A group of submitters were concerned about years served being the marker for progression in a potential tiered licence structure.

Individual, Education/Training/Skills (25)

Experience does NOT NECESSARILY MEAN THAT YOU ARE Competent in the industry, As you may have been doing this for yours and feel confident, however you may not have been updated on the new law changes to the way things are done now.

Individual, LBP, Education/Training/Skills (32)

Experience is a vague term. 35 years building barns vs 15 years of architectural residences. Experience to me is variety as well as time and that is very hard to measure but if that can be done then I am in favour

Individual, BCA/Building Consent Authority, Residential Building Owner (35)

No – frequently those with the most 'experience' are the ones who refuse to provide basic information, fail to complete an LBP Memorandum correctly, have not maintained training with new compliance documents or changes to standards.

Individual, LBP (113)

Yes, but actually on their experience, not on their length of being in this as that doesn't mean anything. Maybe a different colour/standard of the logo. Similar to Master Builder awards.

## A few submitters felt that experience was a good marker for recognition within the LBP scheme, and would make a good marker for a tiered structure.

Individual, LBP (95)

Yes. Just count the years in the trade.

Individual, LBP (100)

Yes, 30+ years and still having to compromise for council punters who think they have more experience, I am currently reviewing whether to invoice council members for wasting time, and asking for council LBP, as some require changes that are not in compliance with NZBC.

## Some submitters were satisfied with the way the scheme currently worked and did not think a tiered structure was necessary.

Individual, LBP (5)

No you already have this in place with carpentry 1 and 2. There are always going to be good and bad tradesmen that's the nature of the industry. As a LBP we are already required to keep up to speed with are knowledge.

#### Organisation, Other (39)

No. The providing of a license should be based on competency and experience. Any possible license holder should be subject to the same level rigour in obtaining a license no matter how long they have been in the industry. "Grand parenting" of experienced tradespeople was the method used to enable the LBP scheme and the sector to operate when the scheme was implemented in 2012. We should not be doing that now. All of the trades have national qualifications. These qualifications and a time served element should be the logical progression to being an LBP. As an example a qualified roofer whom has carried on being in the industry and on-site for two years after becoming qualified should be the way forward.

#### Individual, LBP (122)

The scheme is on competency and should remain just that. People with less experience should be encouraged to gain more experience. We need experience and we need to set up goals for regular growth. In my opinion, setting up a layer of 'more experienced' that is not based on measured or proven competency, one that can be perceived as grandstanding without any legs is a bad idea and bad example setting for the younger and less experienced.

One submitter warned that this approach could make the scheme too complex, while another suggested an endorsement-based approach like a drivers licence, where the LBP earned a basic licence and then had endorsements added onto it with new skills learned.

### Question 20: Do you believe that the LBP scheme should offer a tiered system to separate inexperienced LBPs from those with more experience? If so, how should it be set up?

Based on feedback received during the April 2019 consultation, MBIE was aware of the potential demand for a tiered licensing structure in the LBP scheme. Question 20 sought to determine how much appetite there was for this.

The majority of submitters were in favour of a tiered licence structure, with 57 per cent wanting to see this in some way.

#### **CLASSIFICATION TEXT**



## Some submitters felt that a tiered licence structure would help separate out and distinguish more competent LBPs.

Individual, LBP, Other (19)

Yes, as identified above, experience needs to be a higher relevance to a person's licence class. The best approach is allow for qualification or experience to obtain a basic licence for some function like Design etc., then allow for experience and new learning to be added to that licence that certifies some specific expertise that person had obtained through years of experience. Although needs fine tuning I believe if you had the many types of add-ons listed that have some relevant letter that can be added to the licence.

Individual, LBP (23)

Three level going up every five years, start on level one for new LBP and level three after ten years with good on-going training every year.

Individual, LBP, BCA/Building Consent Officer, Residential Building Owner, Commercial building Owner (26)

Yes as all LBPs at the moment are all equal in everyone's eyes and we all know that they are all very different in there competency's and ability. Yes, grade it say 1 - 4. Start with a grade 4 when you first get it and work your way up to level 1 once you have a proven track record. Imagine having a LBP ITO like the apprentices have where the guy comes round and checks and signs you off, checks the supervision log, and ROWs etc. those who are on to it would excel and those that can't be bothered stay at a level 4.

#### Individual, Designer (137)

As well as 'minimum' skills maintenance requirements, a new opportunity could be added for 'upskilling' in classes that have multiple tier levels (currently Design 1,2,3 & Site 1,2,3) This would provide a valid and motivational path for proving increased competence in one's class, with the incentive of achieving higher license levels over

time. Much of the expertise in any industry comes as a result of lots a small improvements and experiences over a long period of time. An 'upskill' log would give license holders a place to record these improvements, and progress steadily to the next level up. This log could also be more specific, proactively telling the user what skills are still required in order to more up to the next class.

## A group of submitters thought a tiered licence structure was be a good way of solving problems around supervision.

Organisation, Other (55)

Agree only if higher levels of competence are introduced for specific licences, e.g., supervisors.

Individual, LBP, Designer, Engineer, Residential Building Owner (37)

Yes. The current assessment that is employed looking at only the last five years of a candidate's work history is particularly poor. 1 -5 years' experience: work without supervision but cannot issue restricted building work memoranda nor supervise restricted building work. 5-10 years' experience: may issue restricted building work memoranda or supervise restricted building work. Over 10 years' experience: may issue restricted building work and supervise other LBPs

#### Some submitters did not think that the LBP scheme needed a tiered structure.

Individual, LBP, Designer, Other (24)

The status quo appears to be okay as it maintains the level of holders at the required level.

Individual, BCA/Building Consent Authority, Residential Building Owner (35)

No it shouldn't. LBPs should all have to maintain a current knowledge base – experience means nothing.

Individual, LBP (103)

I believe that if your assessment methods are adequate there's no need to complicate it more.

A few submitters thought that it would work best in only a few classes, particularly Carpentry. A few used the Plumbers, Gasfitters and Drainlayers scheme as an example that should be followed.

Question 21: Question 21: Do you believe that a tiered licence would solve any issues? If so, how do you believe it should be structured?

Question 21 focused on how a tiered licence structure could look, and what problems it could solve.

Some submitters felt a tiered licence structure could solve problems with supervision of restricted building work.

Individual, LBP, Other (6)

LBP roofer is responsible for his own work. LBP supervisor would be responsible for all those doing the particular task in the area of practice he holds his licence in.

Organisation, Other (42)

This might solve some issues such as the role of supervisory LBP, however the added complexity may create more problems than it solves. Introduction of a licencing scheme for businesses would be far more effective and would place risk and responsibility where they belong, at a business level.

Organisation, Non-LBP Tradesperson, Other (72)

A tiered license system would solve some issues surrounding LBPs' supervision systems, but the establishment of this, and the complexity surrounding it, might create more problems. The introduction of a licensing scheme for businesses would be more effective, easier to communicate, and would place risk and responsibility at a business level where they belong.

### Some submitted that a tiered structure would increase the overall skill level of those in the scheme.

Individual, LBP (23)

Have better trained people in the industry and up to date with the industry. There are a lot of people in the industry who are still doing work which is not up to the last standards.

Individual, LBP (36)

The need for driver to incentivise expansion of design knowledge. The need to improve the LBP skill level.

Individual, Non-LBP Tradesperson (65)

It would help highlight poor performers that need to be watched.

Organisation, BCA/Building Consent Officer (67)

Provides a career pathway and something to strive for. Higher levels could include onsite supervision. Matched the trades hierarchy e.g.: tradesman, leading hand, foreman etc.

### A group of submitters thought it would not resolve any issues, and that it could make the scheme too complicated.

Individual, LBP, Designer, Residential Building Owner (34)

No I don't believe it would solve issues in the design sector. I think it might create issues.

Individual, Other (48)

No, it might complicate things

#### Individual, Other (49)

No, not of itself. Example, who holds the BCA and staff to account, it is clearly not IANZ, MBIE of the BCA, then who ensures accountability and that the skill sets required are there and used correctly and consistently. You cannot impose liability/accountability to one or some of the below successfully unless the playing field

is level and all have the same standards and competencies to achieve.

#### **CLASSIFICATION TEXT**

One submitter thought that it might help reduce construction costs and speed up the construction process, while another suggested it may help even out power imbalances, but did not explain what the power imbalances were.

### Part 3: Core Competencies and Minimum Standards

The consultation asked five questions about the core competencies and minimum standards for entry into the LBP scheme. The questions aimed to confirm whether potential issues in this area were leading to a poor perception of the scheme, and whether raising the standards would help increase confidence in licensed professionals.

Question 22: How well do you think the LBP scheme currently ensures new applicants and existing LBPs are sufficiently competent?

It is important that the LBP scheme ensures that new LBPs are sufficiently competent. Question 22 aimed to determine whether the scheme does this effectively.

#### Many submitters felt that the minimum standards for entry were set too low. Individual, LBP, Other (19)

Not well at all, too focused on qualifications and even give blindly full Design 3 status to anyone that is a registered architect or engineer, yet not justified in most if not all cases. I see many other designers of even licence 2 that lack in many skills due to no practical experience and have had to correct many. Yet I recall at my LBP interview being grilled too much about what I have done but limited to last couple years, for pricing, preliminary and draft plans etc. etc., yet even by then I was a specialist designer and did not draw plans, but supervised and reviewed many others and gave technical specific inputs for weathertightness and practical options for the many earthquake repairs we had to do in Christchurch, we also had separate teams dealing with contracts and pricing etc.

#### Organisation, Other (57)

Not well enough. Stricter and higher level competency requirements are needed, particularly for supervisors and supervision.

Organisation, Other (55)

Our understanding from industry practitioners is there is insufficient rigour in the approval and renewal of licences.

## A group of submitters felt that the current minimum standards for entry were at the right level.

Individual (17)

I find the requirements quite encompassing and thorough so I feel the requirements are doing their job in producing competent LBPs.

#### Individual, LBP (20)

I believe the scheme is working. I think this is my third licensing period I was an apprentice back when it was launched, unqualified builders could sign up and use their mates as referees.

#### Organisation, Other (44)

The approval and renewal of licences does not appear to be adequately robust.

Some others said that it was the Continued Professional Development requirements that needed upgrading to ensure competence in the sector.

#### Question 23: What specific parts of the scheme do you think are driving low confidence?

Question 23 sought opinions from those who dealt with both the scheme and the general public as to why people would have low confidence in the scheme, as had been suggested both anecdotally and in the 2019 consultation.

### Some submitters said that the scheme was not understood correctly by the general public.

Individual, LBP (4)

I just think the classes in some cases need more public friendly names.

Individual, LBP, Other (19)

Each category licence is too broad and too limited to not allow for experience as much if not more than blind faith on qualifications.

### A few submitters submitted that low entry standards led to low confidence in the scheme.

Organisation, Other (44)

The approval and renewal of licences does not appear to be adequately robust.

#### Some thought that there was no low confidence in the LBP scheme.

Individual, LBP, Designer, Other (24)

I believe the standards are reasonable, so don't believe there is a low standard. However, I'm always happy for any improvements.

# A group of submitters suggested low confidence a perception that some LBPs were undertaking a poor standard of work and not being held to account.

Individual, LBP, Residential Building Owner, Commercial Building Owner (30)

I don't think that lifting the minimum standards is the answer as this will reduce the number of people with the approval to undertake construction work within their skill levels. Furthermore, I don't believe that the standards of the licence holder that are currently in place can be adequately confirmed by the LBP board. It would be better to have basic requirements only for each licence class, but have optional 'add-ons' (areas of practice) to give the ability for the licence holder to increase their level of competence. Perhaps the licence could be termed 'restricted licence' if only the minimum requirements are achieved by the licence holder. This could progress to a full licence once the licence holder has increased their competency level and has a sufficient number of optional 'add-ons', and have their trade qualification.

#### Individual, LBP, Education/Training/Skills (32)

You see a lot of poor workmanship from apparently licenced operators. The required learning exercises strike me as childish lip service and do not reflect any real ability. The general perception in the industry is that standards have not improved, liability has increased and the fee in a revenue stream for a government department that returns no real value to the members.

#### **CLASSIFICATION TEXT**

Question 24: Should we lift minimum standards of competence in the Rules? What level should they be set at, and are there particular gaps that need to be covered?

MBIE is aware of some concerns regarding the level of competence standards. Question 26 sought to determine whether there was genuine appetite to raise the minimum standards for entry into the scheme.



#### Just over half of submitters were in favour of lifting the standards of competence. Individual, LBP (41)

Can we not have an exam type system? So many workers insist on the E2/AS1 acceptable solutions when an alternative solution is far superior. They just can't see it. They don't understand the basic science of construction and weather tightness.

Organisation, Other (55)

Our understanding from industry practitioners is there is insufficient rigour in the approval and renewal of licences.

Individual, LBP (63)

I think raising the competency standards is a good move. I don't think allowing Joe Blogs / homeowners to carry out what has been allowed is helpful. I think we will see a repetition of the leaky home syndrome but with differing outcomes. Especially structural.

A group of submitters felt that mandatory qualifications for those who wished to enter the scheme would be better than raising the minimum standards. NZSMA (53)

All LBPs should hold a relevant qualification.

Individual, Non-LBP Tradesperson (65)

Yes 100%! You should be fully qualified or certified by a recognised training company before you are even allowed to sign up for LBP. Currently anyone who can read a book and answer a couple of questions on the phone can get an LBP.

Organisation, Other (111)

Being qualified at time of becoming an applicant. Remove unqualified application process.

### Many submitters felt that the competence levels of the scheme were at the right place.

Individual, LBP (4)

No because it is too subjective to do that – does longevity as a tradie make you better – not necessarily so. Plus in the race to get more qualifications the really competent but busy people would be left behind.

Individual, LBP, Designer, Residential Building Owner (34)

I don't feel the minimum standards should be lifted. I would say a gap in the scheme would be allowing for contract administration to be a separate part as it does not necessarily go with the complexity of a building. People may apply for this qualification separately at any design level to allow them to be qualified to administer a contract at any building complexity. And also not have this qualification if it is not part of the work they do.

Individual, LBP (124)

No, let the industry and training/qualifications do this.

A couple of submitters suggested that the skills maintenance process needed to be lifted instead, while another couple felt that a tiered licence would solve this issue.

Question 25: Should formal qualifications be required for anyone in the scheme? If they were required, are there any issues MBIE should take into account?

With qualifications becoming more commonplace with LBPs, the consultation asked whether qualifications should be made mandatory for anyone wishing to enter the LBP scheme.

#### **CLASSIFICATION TEXT**



## Most submitters were in favour of mandatory qualifications for anyone applying to enter the LBP scheme.

Individual, LBP, Other (6)

I personally believe we have come to the time were no one should be granted an LBP license in any area of practice until they have completed a trade qualification to show they have had some formal training.

Individual, LBP (36)

Yes, however they provide a basis for knowledge the design practice or the practitioner's knowledge skill need to achieve a basic level before being granted LBP status.

Organisation, Other (43)

Yes, we believe that if one is in-employment they must be in a training program relevant to their job roles, whether a full trade qualification or a micro-credential specialisation.

#### Organisation, BCA/Building Consent Officer (88)

Yes. Trade qualifications, time served, and quality work records must be required at a minimum. Sighting and using Inspection records for trade licences and requests for information during consenting for design licences should be and requirement of assessments. Inspection records are supplied to the LBP meeting an Inspector on site, and a designer also receives their RFI so it should be possible for these to be provided by the LBP at assessment time without always having to make information requests of a BCA.

34

#### A group submitters submitted that practical experience was more important than the theoretical work prospective LBPs would do in a classroom environment. Individual (14)

Qualifications are only part of the knowledge, experience on site is equally or even more valuable.

Organisation, BCA/Building Consent Officer (77)

In some ways the LBP scheme should place more emphasis on formal education and training. We suggest this be done in the following ways: Tertiary training courses offer more practicums so students don't just know theory by the time they graduate. We have building and vehicle WOFs, and doctors check-ups but what about professional check-ups? Technology and laws are changing rapidly, affecting what we do and how we perform. We need something more constructive than the CPD points scheme offers for professional development. Something where group learning can take place is very worthwhile so people can learn off each other.

Individual, Other (124)

No, onsite training is just as valuable if not of more value in some trades.

## Some submitters warned that, if qualifications were made mandatory, it would preclude otherwise capable practitioners from becoming licensed.

Individual, Other (40)

No. some people are a lot better at doing the work than academic study and they need to be given the opportunity to prove that by assessment of their skills, not penalised by insisting on academic achievement. Apprenticeships are a better way of learning than technical institute study.

#### Individual, Other (48)

No, not if they have got proven experience. Many LBP have been working in the industry for years and have proven themselves to be more than competent. I think that current members and future members should be able to stay in the scheme when they have proven themselves with years of experience. I don't believe formal qualifications should be required especially for LBP's already in the scheme as they have proven themselves and have shown continued professional development

Individual, LBP (96)

No. This would preclude some very good tradespeople.

A couple of submitters suggested that the qualifications themselves needed to be improved before this was a possibility, while a couple suggested a model similar to what is currently operating, where those without qualifications face a more rigorous assessment process than those with them.

Question 26: How can assessment and skills maintenance requirements support confidence that practitioners meet minimum standards, and are keeping their skills and knowledge up to date?

Question 26 aimed to confirm whether there were any issues with the skills maintenance process used to ensure licensed LBPs remain up-to-date with changing practices within the sector.

# A group of submitters said that the system was working well as it currently is, and that skills maintenance requirements did not need to be increased.

Individual, LBP (4)

The system seems to be working well. We all work in a very competitive field and know we need to keep up or fall behind. We are very busy and make the time for the LBP system because we need it to operate in construction and support the idea of cowboys being removed from the industry but would be struggling to spend too much more time if the system gets too complex.

Individual, LBP (5)

The LBP scheme and maintenance is doing this already. Step away from the control panel things are working fine.

Individual, Other (48)

The current system is working fine.

Individual, LBP (98)

As it is now. Maybe Project Managers could help here by identifying any practitioner that was doing shoddy work.

### A couple of submitters said that the skills maintenance process needed to be more rigorous.

Organisation, Other (39)

The evidence collected when being assessed is not of sufficient rigour. It is an integrity test in fact. Is the work evidence actually the work of the potential license holder? For our National Qualification the candidate has to show competency on a module where they show application of the knowledge and the physical skills required to complete the work. Provided the assessment has the bar set high enough of course.

# A couple of submitters felt that any issues surrounding LBP competence lay earlier in the process at the point of application, and not with the skills maintenance process. Organisation, Other (61)

An appropriate qualification. Renewal of licences should require evidence of recent practice and skills maintenance, appropriate to the licence class.

Individual, LBP (95)

Keep it simple. Hands-on skills don't always equate to academic ability. Never forget. academic arrogance is the last thing tradespeople need.

One suggested introducing an online portal to be accessed regularly by LBPs, where they could upload information such as building consents, while another suggested a mandatory course that must be attended annually as part of continued professional development.