

## THE AUSTRALIAN INSTITUTE OF ARCHITECTS RESPONSE TO THE ISSUES PAPER : 2020 REVIEW OF THE NATIONAL STANDARD OF COMPETENCY FOR ARCHITECTS

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July 2020

### INTRODUCTION

The Australian Institute of Architects (the Institute) welcomes the opportunity to comment on the National Standard of Competency for Architects (NSCA) Review Issues Paper and looks forward to contributing to the next consultation phase of the review process when more detail of the proposed revisions, such as performance criteria, are developed and associated structures are defined.

The timing of this revision of the NSCA presents an extraordinary opportunity for professional and industry leadership.

In 2019 the Australian Institute of Architects made two significant public commitments, on Climate Action (by endorsing Architects Declare) and our responsibility to Australia's First Nations People. It is the Institute's view that these critical and timely foci should also be addressed in the next iteration of the NSCA.

The Architects Declare pledge now has signatures from more than 900 Australian practices that have committed to acting on the twin crises of climate breakdown and biodiversity loss. The Institute has taken this commitment forward by establishing a Climate Action and Sustainability Taskforce (CAST) and instigating collective action with industry peers by bringing together other peak professional bodies to form a National Climate Roundtable.

The next decade is critical for delivering climate safety. Transforming societies and economies will require using new strategies and capacities. The key to delivering climate safety is rapidly creating real solutions by 2030. This will require the re-engineering of architectural education and practice by 2025. Accordingly, this current NSCA review must ensure it provides the framework to achieve this.

The Institute recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Island peoples as the First Peoples of these lands and waters. This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander countries, cultures and communities, and their ways of being, knowing and doing; caring for Country is fundamental to this. As such, the Institute recognises a professional imperative to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples and the cultural significance of the environments in which architects practice. The Institute has established a First Nations Advisory Working Group (FNAWG) and is working to develop an Institute Reconciliation Action Plan.

Australia is at a unique and serendipitous moment where these two critical issues can and must coalesce into a positive and advantageous future for the profession, society and our environment. This response has been prepared in light of these critical commitments, the urgency of action required to respond, and with the view that the paradigms of those commitments should be firmly, visibly and quantifiably embedded in the NSCA.

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This response is informed by:

- The National Education Committee (NEC)
- The National Practice Committee (NPC)
- The Climate Action and Sustainability Taskforce (CAST)
- The First Nations Advisory Working Group (FNAWG)
- Individual members
- Enquiries from members of the public

The Institute's response is structured as per the 'General Guidance' of the NSCA Issues Paper under 3 key headings:

1. Comments on the issues for consideration
2. Comments on the recommendations for change
3. Comment on the extent to which the proposed approach to revisions to the NSCA will meet the terms of reference established.

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### COMMENTS ON THE ISSUES FOR CONSIDERATION

#### ISSUE 1. CHANGES IN THE CONTEXT OF PRACTICE

##### 1.1 General Comment

The Institute concurs with the overall statements made about the changes in the context of practice but would like to emphasise the following points and specifically emphasise the urgency of point 1.2.

##### 1.2 The Critical Contexts of our Time in Australia and Globally

These contexts, as outlined above through the Institute's 2019 commitments, are discussed in the Issues Paper. The Issues Paper acknowledges climate change as an increasingly urgent concern and that the current NSCA does not incorporate explicit actions required as appropriate responses.

As outlined in the Introduction, addressing climate change and taking definitive action to mitigate the impacts from the built environment must be elevated to the forefront of envisioning the practice of the future. The NSCA must therefore take an aspirational vision position for the profession by formulating a stronger proactive paradigm shift.

It is critical, therefore, that in this review of the NSCA, the AACA pre-empts the evolution of practice essential to meeting this immediate challenge. This is discussed further in Issue 5.

The formal recognition of First Nations People and the concept of regenerative design are not included in the current NSCA. This is noted in the Issues Paper. This is considered as the other of the two critical, interrelated issues confronting Australian society and the practice of architecture. This is also further elaborated in Issue 5.

##### 1.3 Upholding the value of the profession and the responsibilities of architects to those entering the profession.

Technological change, ethics and social responsibility are considered by the profession as important drivers of future curriculum, as noted in *The AACA Architectural Education & the Profession in Australia & New Zealand, 2019*. The Institute welcomes the explicit inclusion of these topics into the NSCA.

It is agreed that these drivers are constantly evolving and therefore continually impacting on the competencies required of architects. This problem cannot be solved by the NSCA alone, however the NSCA should be positioned to demonstrate and uphold the value of an architect and encourage suitable training and experience of graduates in an uncertain future.

It is noted that modes of employment have changed rapidly over the last five years and that many graduates struggle to acquire the experience required to meet certain registration requirements, including contract administration. The Architects Award 2020 stipulates employers' duties to review and provide feedback on the performance of their graduate and newly registered architect employees through a set of competencies with the intention of enabling them to become well

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rounded and competent professional practitioners. The NSCA should align with the competencies identified in the Award and corroborate the employer's duty.

Many architects in Australia work in small to medium sized practices which require them to administer the business in parallel with providing specific architectural services. Architects need to be able to manage these business administration functions competently in order to meet their registration obligations.

There is therefore a key role for universities in preparing future architects for the provision of architectural services and the business components of practice. Accordingly, the NSCA should reflect an expectation that Masters degree curricula prepare students for literacy in areas such as contract administration and documentation, business administration and business acumen. This will help to ensure the continuing lead role of the profession in the design and construction industry.

### ISSUE 2. USE OF THE NSCA ACROSS COMPETENCY CONTEXTS

#### 2.1 General Comment

The Institute concurs with the overall statements made about the use of the NSCA across competency contexts but would like to emphasise the following points:

#### 2.2 The Role and Reach of the NSCA

While the NSCA is at the forefront community protection clarifying the expectation of a competent practising architect, it is important that the NSCA has clarity as a far-reaching reference document.

The structure of the NSCA has a profound effect on the consideration by university hierarchies of architecture schools' delivery. It also has key audiences beyond students, academics and program directors, graduates looking to register, and practising architects seeking continuing development. It may also be used by the community as a descriptor of the breadth of architectural services and what the public should expect, and used as a reference for those considering entering the profession. (Mentioned further in Issue 3.) It follows that the clarity of the document's structure and the accessibility of its language are vitally important.

#### 2.3 Competency Contexts

The Institute welcomes the careful consideration of the multiple contexts in which the NSCA is applied. The disjunction between performance criteria and the procedure by which they are considered in the university context has long been problematic. For universities, clear and direct expression of what should (or need not) be addressed across the NSCA is therefore needed, along with clear articulation of the relationship between the NSCA and the ANZAPAP.

A clearly defined demarcation between academia and practice is required to elucidate the distinctions separating these stages.

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### ISSUE 3. FORMAT AND LANGUAGE

#### 3.1 General Comment

The Institute concurs with the overall statements made about format and language but would like to emphasise the following points:

#### 3.2 3 Profiles

The Institute supports the division of performance criteria into 3 'Profiles', as it correctly and reasonably acknowledges the levels of knowledge.

#### 3.3 Capabilities

As noted, the Knowledge Domains are poorly understood (p.11); their relationship to the units of competency and performance criteria are unclear. It is also suggested that the additional phrases 'in practice', 'in architectural practice', 'in architectural design' and 'in design' are unnecessary as definitions are given.

#### 3.4 Performance Criteria

The importance of accessible language was noted in the response to Issue 1. The change proposed to the clear expressions of performance criteria (beginning with active verbs) will make the NSCA more user-friendly.

#### 3.2 Sustainability

How sustainability would be written into the NSCA matrix, possibly as an additional competency, was discussed at length by many members. No final position was reached but it was considered critical that the Expert Reference Group (ERG) ensures it is clearly embedded.

Within the university sector the NSCA matrix becomes a tick-box tool. Positioning sustainability appropriately in the matrix would ensure those resisting change must accommodate it and instant adjustment of curricula Australia-wide would be demanded (potentially meaning demonstrated impact by 2025). It would also acknowledge/legitimise those already teaching and researching in this space (including regenerative design, indigenous perspective, environmental principles etc).

The current model is problematic (obstructive, even). Sustainability is a complex system-scale issue that calls for integration across all dimensions of architectural education. The Institute trusts that the ERG will embed it where it will be the most effective.

### ISSUE 4. LINEAR FORMAT OF THE NSCA

#### 4.1 General Comment

The Institute concurs with the overall statements made about the linear format of the NSCA but would like to emphasise the following:

The recognition of the need to review the format of the NSCA is welcome. It is noted that the while linear format does include some redundancies, the current scaffolding of the criteria recognises the growing complexity of skills and knowledge as a project progresses through design to project delivery. It is hoped that this scaffolding, or similar, remains where relevant.

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For educators of architects the lack of differentiation between criteria that should be addressed at undergraduate versus postgraduate level remains a problem. There is significant movement of students between undergraduate and postgraduate architecture courses, rendering it increasingly difficult to guarantee which criteria might be met (or not) in students entering Master of Architecture courses. Clear direction in the revised NSCA will address this.

### ISSUE 5. INADEQUATE ETHICAL PERSPECTIVES TO THE NSCA

#### 5.1 General Comment

The Institute concurs with the overall statements made about inadequate ethical perspectives to the NSCA but would like to emphasise the following points:

#### 5.2. The Climate Emergency

That the climate emergency is an ethical issue for the profession and society has already been discussed in Issue 1. The critical nature of this moment in time is based on the fundamental requirement that by 2030 all new building should be zero carbon and all repurposing must be 'deep retrofit' to also achieve a zero-carbon outcome.

Given that many buildings take in the vicinity of five years to progress from initiation to construction, re-engineering of both practice and undergraduate education by 2025 is required to build the capacity for zero carbon design by 2030.

The next review of the NSCA will be therefore too late. The revised NSCA presents a once in a generation opportunity for leadership.

As previously stated, it is critical that in this review of the NSCA, the AACA pre-empts the evolution of practice, essential in meeting the immediate challenges for the profession in meeting its ethical obligations.

To borrow from the Australian Architects Declare vision, we need:

**TO** empower Architects to create a paradigm shift in our behaviour and take responsibility for action in our own lives and practices

**IN A WAY THAT** the creation of Buildings and Cities will no longer be the problem, but a catalyst towards the regeneration of the planet

**SO THAT** we can live in a constantly regenerating and self-sustaining world where we collaboratively work towards the health of people and ecosystems.

Feedback from the survey undertaken to inform the Issues Paper was unequivocal: 'ethics', 'climate change and environmental issues' and 'Indigenous perspectives', were clearly identified as areas where the NSCA should change (p8). This survey response provides a remit for the ERG to make serious and necessary changes to the NSCA.

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### 5.3 Engagement with First Nations People and Regenerative Design

While Indigenous recognition and climate change are both ethical matters for architects and impact directly on architects' professional performance (p11), it is important for the NCSA not to conflate the two issues. The Institute is concerned that these major matters, as noted in the response to Issue 1, seem to have been subsumed under the single subheading 'Issue 5. Inadequate ethical perspectives. Additionally, it is imperative that the NSCA recognise them not just as ethical concerns but as distinct and critical knowledge and skill sets.

The Issues Paper notes that 'There are increasing calls for the formal recognition of Aboriginal and Torres Strait Islander peoples as traditional owners of the land, and the need for Indigenous [First Nations] design perspectives to be integrated into practice.' (p10) This is not only a 'call'; in New South Wales there is already a statutory requirement in the Environmental Planning and Assessment Act 1979 No 203 to protect and maintain Aboriginal culture and heritage and the Act makes direct reference to the Aboriginal Land Rights Amendment Act 2009 No 58. As such, it is a statutory obligation on architects that should be addressed directly in the NSCA. The Aboriginal Culture and Heritage Act reforms in each state need to be considered here.

Further, the Australian Institute of Architects' Constitution 2020 has included a First Nations Statement of Recognition as a preamble to the document. This represents a significant cultural shift and commitment at the national level to filter through to state and territory Chapter Councils and further reinforce First Nations cultures in architecture.

These skills sets should include the capacity to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples and the country in which the project is based to understand, engage with and support patterns and principles which create conditions conducive to life for current and future generations. This needs to be achieved through developing a deep understanding of the three essential elements of designing with Country: nature, people and design.

(It would also be a reasonable expectation of any competent professional architect to ensure that First Nations Cultural and Intellectual Property rights are respected and appropriately remunerated. This ensures traditional custodians and representatives of First Nations communities maintain control, authorship of this knowledge and how it is shared with others.)

A lack of First Nations students engaging in architectural education in Australia is identified in the AACA report *Architecture Education and the Profession in Australia and New Zealand*, December 2019. Embedding Aboriginal and Torres Strait Islander specific competencies into the Architectural education framework in Australia may encourage First Nations people to consider architecture as a career path within culturally competent and safe environments.



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### COMMENTS ON THE RECOMMENDATIONS FOR CHANGE

#### General Comment

The Institute response below covers the five recommendations given in the Issues Paper. The recommendations given are more about the structure and definitions of and in the NSCA. Although Recommendation 1 foreshadows Social and Ethical Capabilities, it is of concern that the Recommendations do not explicitly acknowledge or recommend the incorporation of all the important issues identified and addressed in the Issues for Consideration section. There is no specific Recommendation about the critical inclusion of new performance criteria relating to Climate Change, Cultural Diversity/First Nations People/Regenerative Design or ethics. A Recommendation 6 has been included for consideration.

#### Recommendation 1

Recommendation 1. Conceive the NSCA as a Framework of Professional Competency viewed through specified Professional Capabilities: Professionalism in Practice (incorporating the content areas of the existing Disciplinary and Regulatory Knowledge Domains), Social and Ethical Capabilities in Architectural Practice, Sustainable Environments in Architectural Design, and Communication in Design.

The 2015 edition of the NSCA was complex: ‘four Units of Competency, 9 Elements and 70 Performance Criteria relevant to the activities of professional architectural practice. Five Knowledge Domains underpin the entire framework, providing the background knowledge required to engage in architectural practice.’ (p6) It is worth noting further that the Performance Criteria are then applied at three levels (knowledge, skill and application) across programs. This complexity lends itself to obfuscation; the relationship between the ‘units of competency’, ‘elements’, ‘performance criteria’, ‘knowledge domains’ and levels of application are not easily understood. The document should however be very clear in both what it says and how it says it.

The proposed Professional Capabilities successfully address the depth and breadth of the content of the curricula. This supports the potential for the NSCA to be used to direct the development of programs (at all levels) as well as the assessment of performance. To realise this potential the NSCA must provide specific detail for each of the Capabilities and articulate more clearly their relationship to the Performance Criteria.

Enclosure 4 provides samples of the language associated with the transition from ‘Knowledge Domains’ to ‘Professional Capabilities’. Enclosure 5 provides samples of the reframing of the Performance criteria. The re-wording will make the Professional Capabilities and Performance criteria far easier to understand than the previous version. However, the relationship between the Professional Capabilities and Performance Criteria remains unclear; there are phrases in the Professional Capabilities examples that could describe Performance Criteria and vice-versa. Further clarification of this relationship is necessary.

As previously mentioned, it is recommended that, for simplicity the Professional Capabilities be shortened to Professionalism, Communication, Sustainable Environments, Social and Ethical Capabilities.



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### Recommendation 2

Recommendation 2. Retain four units of competency with a refocus on the architect's primary responsibilities in design and in design project delivery: Design, Detailed Design and Documentation, Design Delivery, Professional Practice.

The Institute agrees with retaining four Units of Competence and changing the names of the Units but disagrees with the change to a design focus. This does not reflect the full remit of an architect and therefore risks limiting the perception and potential future of the role of an architect. The Institute's view is that the current four competencies are less prescriptive regarding a single architectural process than those proposed.

'Design Delivery' misrepresents the role of the architect, which is not merely the delivery of design. Rather an architectural delivery service includes contract administration, construction administration, construction observation, inspections and approvals.

In NSW, for example, regulations are currently being drafted related to the *Design and Building Practitioners Act 2020*. This Act will require the architectural profession to continue to be highly proficient in matters relating to construction documentation, construction detailing, construction administration, including observation, inspection and approvals. While it can be argued architectural competency across these areas has diminished, it is to the detriment of the profession and built outcomes and the implication that this work and these skills are not core to the profession is unacceptable. Any diminishment of the construction role specifically risks the work on the current Design and Building Practitioners Act 2020. (Refer link: <https://www.legislation.nsw.gov.au/#/view/act/2020/7>).

The following are recommended as the minimum Units of Competence:  
Design / Documentation / Delivery / Practice

### Recommendation 3

Recommendation 3. Revise Performance Criteria to reduce repetition - focussing less on the linear project phases and more on the core component of professional obligations of the architect in relation to design services to clients; acknowledging that the functional aspects of these obligations may apply differently across projects depending upon the project type, scale and context of risk and liabilities.

The Institute supports the proposal to reduce repetition in the NSCA. It is suggested that in reducing repetition the overall number of Performance Criteria may be able to be reduced.

### Recommendation 4

Recommendation 4. Remove Elements, the current subgrouping of Performance Criteria under the four units of competency, in order to reduce linearity and repetition in the NSCA.

The Institute supports the proposal to remove 'Elements' in order to reduce linearity and repetition.

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### Recommendation 5

Recommendation 5. Review language and organisation of the Performance Criteria in order to improve user understanding of how Performance Criteria are applied at differing levels across the contexts of the competency profiles of the Architectural Graduate, the Architectural Graduate at Registration and the Registered Architect.

The Institute strongly supports the review of the language and organisation of both Professional Capabilities and Performance criteria. The proposed model for reframing the NSCA (Enclosure 3) makes it clear that the context of ‘the architectural graduate’, ‘the architectural graduate at registration’ and ‘the registered architect’ would be distinct. This is a much-welcomed change that should allow universities, professional bodies and the profession itself to know the extent of the expectations at each of these points. It would be useful to involve students and graduates in the development of the language and organisation of the framework. Engaging students and graduates will have the added benefit of increased awareness and relevancy of the framework.

### Recommendation 6

Recommendation 6. Include in the NSCA, with specific performance criteria, Climate Change and Zero Carbon Design, understanding engagement with First Nations People, and the ethical responsibilities of architects to clients and to society more broadly. Competence with technical tools in relation to measuring performance regarding climate change must be included.

The Institute would encourage the ERG to draw on the expertise of stakeholders in developing the language for both Professional Capabilities and Performance Criteria. This is perhaps most simply illustrated regarding the language related to Country and First Nations peoples. For example, the phrasing ‘Design propositions incorporate First Nations perspectives’ (p 21) might better be expressed as ‘Collaborate with traditional Aboriginal and Torres Strait islander people to ensure their knowledge systems and intellectual cultural property rights are appropriately incorporated into design propositions.’

Regarding the wording and definition of Indigenous Design Perspectives, this should be more broadly described as Aboriginal and Torres Strait Islander Cultural and Intellectual perspectives. Further, there should be ongoing consultation with architecture practitioners and educators who identify as First Nations people to ensure correct language and meaning.

Benchmark Curricula examples:

**Indigenous Design Charter, Australia, 2018**

<https://www.design.org.au/documents/item/216>

[https://www.ico-d.org/database/files/library/International\\_IDC\\_book\\_small\\_web.pdf](https://www.ico-d.org/database/files/library/International_IDC_book_small_web.pdf)

**‘Indigenous competency in Built Environment curricula for educators’, David Jones, 2018**

[https://ltr.edu.au/resources/ID12-2418\\_Deakin\\_Jones\\_2018\\_Guide.pdf](https://ltr.edu.au/resources/ID12-2418_Deakin_Jones_2018_Guide.pdf)

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'Designing with Country', NSW Government Architect, 2020.

<https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/discussion-papers/discussion-paper-designing-with-country-2020-06-02.pdf?la=en>

Wingara Mura Design Principles

<http://sydney.edu.au/documents/about/working-with-us/wingara-mura-design-principles.pdf>

**Our Voices Architecture and Indigeneity** (2017) Editors: Rebecca Kiddle, Kevin O'Brien and Patrick Stewart.

The increasing focus for architects on the performance and productivity of their buildings requires evidence-based design, drawing on increasingly scientific and effective digital data-based modelling tools, modelling behaviours and patterns of use. Architects need to be technically literate in the use of these digital tools and increasingly sophisticated clients look to architects for these skillsets.

This is particularly relevant for designing to address the climate change challenge where modelling tools for assessing energy consumption and embodied carbon must be integrated from the very outset of the project.

Architects will also need to be increasingly engaged in the use of Life Cycle Assessment, Regenerative Design and an understanding of the Circular Economy in their practice by 2025.

The revised NSCA must require though measurable, concrete Performance Criteria that:

1. All graduates are fully versed in the science and practice of decarbonising design and construction (**graduation must be contingent upon this for any accredited course**)
2. All architects have comprehensive capabilities to apply the science of decarbonising the built environment in their practice. (**continuing registration must be contingent upon architects demonstrated training in this**).

### COMMENT ON THE EXTENT TO WHICH THE PROPOSED APPROACH TO REVISIONS TO THE NSCA WILL MEET THE TERMS OF REFERENCE ESTABLISHED.

The suggested changes are largely in line with the terms of reference for the 2020 Review of the NSCA.

Where the proposed approach may fall short is in relation to the extent to which it reflects current and emerging risks across the profession as a whole. This concern is particularly related to the risk of diminishment or marginalisation of architectural services within the construction industry and

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the need to assert the actual and perceived role of architects beyond design, as discussed in the response to Recommendation 2 above.

Writing First Nations knowledge and Zero Carbon Design into the NSCA as essential knowledge and skills will also be critical to successfully reflecting current and emerging risks; this capability will be fundamental to architects' ability to satisfy the proposed Performance Capabilities of Social and Ethical Capabilities in Architectural Practice, and Sustainable Environments in Architectural Design.

To ensure the NSCA is fit for purpose as the benchmark for AACA assessment programs it must (along with the APAP) be strong and robust. As outlined in 3.2, this is integral to enabling educators to argue the case for architectural education in what may be hostile, bureaucratic and transactional environments. While the current approach suggested in the Issues paper is diplomatic, unless the NSCA becomes clearer in articulating what is 'essential' to the education of an architect, and has mechanisms to assess and enforce the standard, the standard will serve little purpose to the institutions that provide architectural education. The AACA is in a unique position as the single accreditation body to establish guidelines that might protect the professional education of architects, including staffing levels of architecture schools, space and facility requirements, the mix and experience of staff, and autonomous leadership of the discipline.

The Institute is confident that the changes suggested to the 2015 NSCA represent strong steps in the right direction. The Institute also wants to take the opportunity to applaud the AACA and the ERG in undertaking to address some of the most pressing ethical issues core to the appropriate functioning of the profession of architecture in Australia.

We urge the AACA and ERG to take this timely opportunity to take critical steps to advance the profession's capability to contribute positively to the built environment, the natural environment and the community more broadly by inscribing competency in sustainability, regenerative design and literacy regarding First Nations people's design culture and intellectual perspectives. The urgency of our climate crisis is indisputable; the time for this action is now.

The NSCA can assist our profession in sustaining our industry relevance and community value. Architects need to confidently position themselves within the evolving design and construction industry. The role of an architect should be at the forefront of innovation so that they are best placed to lead as designers and place makers. In these rapidly changing times architects need to be trained to direct change, rather than merely react.

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### ACHIEVING THE PROJECT TERMS OF REFERENCE AND CONCLUSION

In summary, **if the above matters are adequately and meaningfully addressed** it is believed that the review of the NSCA will have achieved the stated objectives:

- broadly reflects the role of an architect across the diversity of modes of practice
- represents the needs of regulators
- reflects current and emerging risks across the profession as a whole
- is fit for purpose as the benchmark for AACA assessment programs.

It is understood that in Stage 5 of the AACA NSCA review a further round of consultation will occur. As requested in the Introduction, the Institute would like to participate further in this consultation process to ensure the principles articulated here have been implemented and are adequately incorporated into the specific performance criteria items not provided here for review.

Compiled by Kate Moore, National Manager Education and Research

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