Australian Institute of Architects

REVIEW OF THE NATIONAL STANDARD OF COMPETENCY FOR ARCHITECTS (NSCA)

Architects Accreditation Council of Australia (AACA)

Submission date: 2 March 2021

ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) to provide input to the review the National Standard of Competency for Architects (NSCA) being undertaken by the Architects Accreditation Council of Australia (AACA).
- This submission has been co-ordinated by the National Manager, Education and Research in conjunction with Institute Committees and with additional input from across the membership. A Supplementary Submission by the Institute's First Nations Advisory Working Group and Cultural Reference Panel complements this submission.
- At the time of this submission the National President is Alice Hampson and the Chief Executive Officer is Julia Cambage.

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1 INTRODUCTION

Thank you for the opportunity to respond to the revised AACA NSCA Consultation Draft.

The Institute provides a collaborative response and expert advice from Nationwide Chapter Education Committees, the National Education Committee (NEC), and other National Committees including the First Nations Advisory Working Group (FNAWG) and Cultural Reference Panel (FNAWG, to be included as a supplementary document) and the Climate Action and Sustainability Taskforce (CAST), as well as practitioners and academics. Included also are responses from the Institute's Emerging Architects and Graduates Network (EmAGN) and the Institute's student members (SONA).

This response is also informed by the Institute's July 2020 response to the AACA 2020 Issues Paper. Additionally, it is noted that the terms of reference of the 2020 NSCA review was to 'reflect the role of an architect' and 'reflect the current and emerging risks across the profession…' and that in the Stage 1 survey, it was clearly identified that the NSCA should include further focus on 'Climate change and environmental issues'.

This response has been divided into sections that represent the matters considered particularly important and which were universally addressed in discussions. Detailed responses relating to professional capabilities, competencies and language have been provided as appropriate.

2 OVERVIEW

In general, the Institute agrees that the proposed NSCA:

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

The simplification and improved clarity of the document is evident. The Institute welcomes the reduction in total number of competencies being consolidated from 70 to 60, and the requirements for a graduate being reduced from 37 to 35. This will provide ease of use particularly for academics, assessors and registration candidates.

The removal of the previous nine elements allows the new units of competency to be more malleable, more reflective of diverse practice experiences, and will assist in reducing linearity and repetition in the NSCA. The NSCA will benefit from being less prescriptive – it will be more easily used, particularly for the graduate/employer, and for the benefit of universities in the writing of course structure and content, and for accreditors using the document as a framework for evaluation.

The move away from the traditional linear project delivery model also allows the competencies to be flexibly and meaningfully applied to individual experience and circumstance. This less prescriptive approach to architecture better reflects project procurement in current practice, whilst also allowing for the 'traditional' linear approach to fit into this as well.

The Institute acknowledges the primary purpose of the NSCA is for consumer protection. However, the additional professional and community benefits of the proposed changes are considerable and are addressed in this response.

The new National Standard of Competency for Architects represents a positive shift in the minimum standard expected of an architect, particularly in terms of social, ethical, cultural and environmental responsibilities.

It is important that the schools of architecture and professional development providers are equipped to adequately support these expectations and requirements and that registered architects use it for professional development guidance. It is also hoped that this document will highlight the necessity for employers to provide broad work experience, ethical work environments, and encourage meaningful mentorship opportunities which are all areas of ongoing concern in the profession.

Most importantly the Institute encourages the potential of the NSCA to serve as a communication tool to the public about what architects do. Ongoing strategic considerations will be required to ensure the NSCA achieves this potential community reach.

3 FIRST NATIONS AND CULTURAL LITERACY

The Institute's First Nations Advisory Working Group (FNAWG) and Cultural Reference Panel have overseen the co-ordination of comments on an architect's responsibility to Aboriginal and Torres Strait Islander Peoples' as represented in the NSCA. These comments will be provided as agreed in a separate Supplementary Submission as soon as possible.

Other groups within the Institute also considered that:

- Matters identified by the FNAWG and Cultural Reference Panel should be embedded into design studio, with supporting technical learning - in every studio. It should occur at the very outset of architectural education so that this thinking is integral at the beginning of the learning process in becoming an architect.
- Academics will need to be trained and mentored to be able to provide appropriate and meaningful curriculum content. Standing Panel members will need to be trained and mentored to be able to appropriately assess any specific competencies identified by the FNAWG and Panel.
- The NSCA should look to include a **Statement of Recognition of the Aboriginal and Torres Strait Islander peoples** in the revised document. Further to this, the presentation, graphics and format of the revised final NSCA document could be

designed to further acknowledge the importance of the inclusion of First Nations peoples and caring for Country as an integral part of architecture and architecture education, and to symbolise the importance of this change to the NSCA.

These themes will be considered further and expanded on as appropriate in the Supplementary Submission.

4 GENERAL CULTURAL COMPETENCE

Cultural competence should be extended to broader global cultural diversity and equity in general. The profession must have an increased understanding of, knowledge of and competence related to equity, diversity, accessibility and inclusion and this should be embedded in the NSCA. Appropriate statements should be added to the Professional Capabilities rather than being incorporated into specific competencies so that this is integral to architectural education and the profession.

5 CLIMATE ACTION AND SUSTAINABILITY TASKFORCE (CAST)

In October 2020, CAST submitted a report to the Institute's National Council with a list of commitments in dealing with the climate emergency. The Council supported the report and endorsed these commitments.

To achieve these commitments, it is CAST and the Institute's responsibility to ensure this alignment is achieved at every opportunity. The NSCA review is exactly such an opportunity. It is not the time to wait for codes and government policy to lead the NSCA, but for the profession to lead. That is our ethical obligation.

CAST considers that the AACA also have an obligation and duty in dealing with the climate emergency. The NSCA document is an opportunity to announce its commitment to dealing with the climate emergency. This should be reinforced at every appropriate opportunity within the competencies, guiding practice and training. In doing so it will highlight the need for additional training at tertiary and practice levels to meet these competencies.

Suggested changes are shown in green in the body of the appropriate clause.

Professional Capability: Environmental and Ethical Practice –

Environmental and ethical practice capabilities are concerned with understanding and embedding the social, ethical, cultural and responsible climate action values relevant to architectural services and understanding how these impact colleagues, clients, stakeholders, and broader communities.

This includes:

- Applying relevant design, technology and the principles of dynamic building energy calculations and analysis of embodied carbon through digital based modelling of

support the transition to a carbon neutral (or zero carbon to align with the C-Cap Report) built environment

(place first to "announce" the imperative)

- Minimising the impact on, and use of, limited natural resources, recognising their inherent value and prioritising design for a circular economy and longevity
- Integrating the perspectives of Aboriginal and Torres Strait Islander Peoples within architectural design services where appropriate
- Demonstrating an ethical, service-oriented commitment to the responsible care for environments and regenerative design
- Supporting and promoting fair and ethical business practices
- Supporting and promoting healthy workplaces that are inclusive and culturally safe.

To be added:

- Acknowledging the need of resilience in the built and natural environments by designing to mitigate the risk of the impacts of climate change already evident - such as fire, sea rise and extremes weather events.

Competency 1 Practice Management and Professional Conduct: Performance criterion 1 Demonstrate understanding of the regulatory requirements and obligations pertaining to practice as an architect, including legislation, professional codes of conduct, mitigation of the impacts on climate change (add to each column)
Competency 1 Practice Management and Professional Conduct: Performance criterion 1 Demonstrate understanding of the regulatory requirements and obligations pertaining to practice as an architect, including legislation, professional codes of conduct, mitigation of the impacts on climate change (add to each column)
Competency 1 Practice Management and Professional Conduct: Performance criterion 3 Demonstrate understanding of the principles of project planning and its implications on stakeholders, carbon footprint and project costs.
Competency 1 Practice Management and Professional Conduct: Performance criterion 7 Demonstrate understanding of traditional, contemporary and emerging building procurement methods and appropriate forms of construction contracts, their mechanisms and risk profiles and evaluation of their impact upon the delivery

procurement method for the project and its implications for low embodied carbon materials, components and construction systems.

Incorporate above as shown in 7 or add a new performance criterion:

Demonstrate an understanding in supply chain implications for low embodied carbon materials, components and construction systems.

Competency 1 Practice Management and Professional Conduct: Performance criterion 9

Provide independent and objective advice in accordance with relevant building codes, guidelines, climate impact and planning regimes across all aspects of architectural practice.

Competency 1 Practice Management and Professional Conduct: Performance criterion 14

Be able to apply risk management and mitigation strategies including safety in design, project risk, requirement for resilience from the impacts of climate change and appropriate insurances across architectural services.

Competency 2 Conceptual Design: Performance criterion 21

Be able to prepare and analyse project development options in response to a project brief, its objectives, budget, user intent and built purpose, risks, carbon footprint impact and timeframes.

and/or preferably the following new one

Be able to prepare and analyse the whole of life carbon impact of project development options using quantitative tools such as Life Cycle Analysis and advise the client on options to minimise the environmental impact including achieving a zero-carbon outcome

Competency 2 Conceptual Design: Performance criterion 22

New Performance criterion to follow 22

To be able to employ current digital tools and specialist consultancies to model the whole of carbon impact, both operational and embodied to advise the client on the potential for achieving a zero-carbon outcome for the project. (possible combined with the new one following line 21)

Competency 2 Conceptual Design: Performance criterion 24

Be able to draw on knowledge from building sciences and technology, environmental sciences and behavioural and social sciences, including current digital modelling tools as part of preliminary design research and in developing the concept design to optimise the performance of the project for its users.

Competency 2 Conceptual Design: Performance criterion 27

Recommendation: Split criterion in two criteria:

1. Be able to identify, analyse and integrate information relevant to the siting of a project, including considering an environmental design approach
2. Be able to identify, analyse and integrate information relevant the lifecycle of a project and sustainability concerns, such as energy and water consumption and embodied carbon.

Competency 2 Conceptual Design: Performance criterion 33

Be able to assess and integrate construction systems and materials considering sustainable structural, construction, serviceability, transport systems and material selection and integrate relevant expertise of specialists and consultants in developing design concepts.

Competency 2 Conceptual Design: New performance criteria – To be placed as high up the table as possible so they are not "seen" as optional add-ons after everything else:

- Be able to advise on the supply chain implications of materials, components and systems for carbon impact.
- Be able to design for the minimising of waste and the use of materials and component which have been recycled to a higher (not lower) value in their use, applying the principles of the "Circular economy".
- Be able to meet the need for resilience in the built and natural environments by designing to mitigate the risk of the impacts of climate change already evident - such as fire, sea rise and extremes weather events

Competency 3 Detailed Design and Documentation Performance criterion 37

Be able to integrate material selection, structural and construction systems into the resolved project design, including meeting the targets for the Lifecycle carbon established in Concept Design.

Competency 3 Detailed Design and Documentation Performance criterion 41

Where appropriate, be able to collaborate with nominated contractors early in the documentation process to identify key construction methodology opportunities and constraints including to minimise site waste and construction carbon.

Competency 3 Detailed Design and Documentation Performance criterion 45

Be able to nominate and integrate quality and performance standards with regard to selected materials, finishes, fittings components and systems. Including understanding the sustainability impacts on the whole of lifecycle carbon impact of the project.

Competency 3 Detailed Design and Documentation Performance criterion 46

Understand the technical, ethical and sustainability credentials of the materials in order to specify and integrate materials, finishes, fittings components and systems for the project and minimise the carbon.

6 LEGISLATION AND STATUTORY REQUIREMENTS

At present, many examples of Legislation and proposed reform pose further insecurity for our profession. One example is the Australian Building Codes Board (ABCB) *National Registration Framework (NRF) for Building Practitioners Discussion Paper 2020,* has recently been prepared in response to the *Shergold Weir Building Confidence Report 2018 (BCR).* This Paper is in response to BCR Recommendations 1 & 2 which propose the registration of building Practitioners meet consistent registration requirements.

The Institute has concerns about the revised NSCA's focus on 'architect's design responsibilities to clients and society' at has been *at the expense* of the more tangible technical knowledge and project management skills. Given the recent concerns from the profession about the proposed National Registration Framework for Building Practitioners this should be given priority. The changing role of the architect and the growing role of architects in quality assurance and consumer confidence processes highlights the importance of an adaptable understanding of Contract Administration and contract types. Expertise in this area is required to uphold the lead role of our profession in the Building Industry.

In the University of Queensland's School of Architecture response to the proposed National Registration Framework dated 21 August 2020, it was argued that:

> *An inherent risk in the proposal is that including Architects and Draftspersons in the same Discipline, referred to generically as 'Registered Building Designer' (pages 15-16), will create confusion and about the different levels of competency and professional regulation, and unnecessarily limit acknowledgement of the creative value added by architects in building design work. A further risk is that not including architects in the Project Co-ordination category will unnecessarily limit the management value added by architects in project delivery work.*

EmAGN in their response to the proposed National Registration Framework dated 24 July 2020, similarly argued that,

> *Architects are educated and trained to consider complexities of design as an engaging, thinking, socially and culturally impactful process. Architects are taught to contribute beyond the production of buildings, and to consider the future of human habitation in terms of health, wellbeing and sustainability. They are trained to consider imagination, innovation, multi and trans-disciplinary thinking as essential to our*

society and economy of the future. … Arguably, the role of 'Project Manager' can and should be undertaken by an Architect {and] the 'Project coordination' role, [should] include and extend to an architect.

There is a lack of understanding in the community about what an architect actually does. Design is often undervalued by government, clients and the public. The AACA NSCA is in a position to clearly define our value, as well as assist in positioning architects to lead change rather than be dictated by change.

Strengthening competencies relating to legislation and statutory requirements –

There is the opportunity to make performance criteria more relevant to the practical components of the design process, reflecting the realities of practice.

Specifically:

- In practice resolution of conceptual design requires that drawings and project outcomes include additional detail and resolution in response to regulatory obligations beyond those included in the performance criteria 16-32.
- The mechanics of being familiar with and complying/ considering statutory requirements related to planning, building and practice management to be expanded in all units of competency.
- More emphasis to the technical requirements of initially considering a built outcome such as material choices, how they go together.
- In recognition that whilst this is a national framework, legislation and statutory requirements differ at the state and local authority levels,

For example:

Professional Capabilities: Professionalism refers to understanding and using relevant legislations, regulations standards and codes.
Recommendation: Reference could be made in professional capabilities and performance criteria to contextualise architectural services.
Performance Criteria 29 makes mention of 'planning principles' which can be regarded as setting out a site with good circulation etc.
Recommendation: An expanded competency that clearly states consideration of statutory planning requirements.
An additional competency that clearly states consideration of statutory building requirements from reference material such as the Australian Standard and BCA.

7 WORK CONDITIONS

Universities –

Which performance criteria can reasonably be assumed to be delivered by an increasingly casualised, under resourced, and disrupted university workforce?

In the new 2018 accreditation procedures the ability of the panel to comment on university program resourcing was reduced (staff to student ratio; teaching space; computer labs; fabrication labs; interviews with student representatives): should this be restored in any revisions to the accreditation procedure and if so in what manner?

Implementation in the education accreditation procedure – timeframe: changes will be required to be reflected in unit learning outcomes and assignment criteria – this means at least two years lead time.

The accreditation process has the capacity to also assist in upholding an appropriate quality of tertiary education and could assist in encouraging Universities to employ a diverse range of educators, including "Practice based" educators. It is highly important for students to receive mentorship from practicing architects at university, however low pay and poor sessional work conditions are often untenable and significantly reduce this opportunity. Poor working conditions at Universities needs to be addressed, and a more collegial synergy between academia and practice in terms of both research and education should be encouraged.

This is referred to in the key findings of the AACA report *Architectural Education and the Profession in Australia and New Zealand, December 2019.* Post-Covid this continues to worsen.

Graduates –

Modes of employment are changing rapidly, and short-term contracts or casual positions are problematic throughout the profession, particularly for graduates. Many graduates find it very difficult to find employment in the industry. Added to this are difficult work conditions, unpaid overtime, and a sense that many employers are not available to provide direction, advice or opportunity.

A common sentiment from employers in the industry is that students are not 'work ready' when they complete university. However, learning does not end at University; it also happens in practice. The 'bridge' between University and Registration can be misunderstood and overlooked in the industry. The 'work ready' expectation places the graduate in a position where the expectation is for them to get the job done, rather than an emphasis on training and learning.

A clear responsibility for an architect is to train graduates appropriately. The AACA NSCA should provide a framework that supports appropriate work conditions and opportunities for students and graduates. NSCA should serve as a benchmark of this responsibility, and it

should be more clearly defined and acknowledged as a legitimate and important Continuing Professional Development requirement.

8 ROLE OF FRAMEWORK AT REGISTRATION

It is recognized that the NSCA Framework plays a critical role in the registration process. The performance criteria are used to structure logbooks and guide applicants when logging professional experience. Where Performance Criteria address multiple areas of knowledge and skills, the criteria become unevenly weighted, limiting the opportunity for applications to accurately and thoroughly document their professional experience.

For example:

> **Performance Criterion 42.** This criterion is intrinsic to the education and registration process of an architect. If all the competencies included in this single criterion are to be met by an applicant for registration, the hours required to log against this one criterion.
>
> **Recommendation:** Expand across additional criteria, each focused on a discrete set of skills and knowledge.

The Institute welcomes the profiles of Architectural Graduate, the Architectural Graduate at Registration and the Registered Architect. These categories make clear the broad contexts in which the NSCA is used, and most importantly highlights the specific stage of the Graduate prior to Registration. This stage in particular is necessary to highlight, drawing attention to and provide a template for the employer to understand their responsibilities, and to give the graduate more leverage to ask for work experience opportunities. This also provides a clear demarcation between what training the university provides, and what is the responsibility of the profession/employer.

There has been a suggestion that there perhaps be a fourth - “Nominated architect”.

9 BIM

The topic of BIM and its inclusion in the NSCA is complex and often polarising. On one hand graduating students are expected to be skilled in BIM in order to find employment. Further to this many government projects stipulate that BIM as a legislated requirement.

However, there are many experienced practitioners, especially in small practice, who do not use BIM to produce architectural works. Not all architects or architecture students are suited to BIM. Considerations of diversity is of great benefit to the profession, in terms of how architects practise and how architects impact the Built environment, and also in terms of who is attracted to the profession of architecture. A diverse student cohort in the study of architecture would be beneficial to the profession.

The proposed revised NSCA is sufficient in its inclusion of BIM. Several groups within the Institute do not favour any further inclusion of BIM in the competencies. The proposed NSCA competencies which imply BIM to some degree but are also flexible in varying modes of communication are considered sufficient. BIM training could be seen as the responsibility of each School of Architecture – not the responsibility of the NSCA.

The new competencies discuss the changing modes of practice yet varying modes/scales of practice are not reflected in the competencies. Is BIM universal or primarily used in large practices? The ABCB has suggested that certain competencies would only be applicable at large scale/high complexity. It seems that the new competencies only have large scale in mind; In many practices this is actually a specialised drafting/visualisation skill rather than a project architect's specific skill;

Most importantly in the BIM discussion, the inclusion of BIM as a requirement for competent practice has software limitations and implications for practices in the future.

As suggested in section 5, it would be more versatile to refer to current digital modelling tools.

"Be able to draw on knowledge from building sciences and technology, environmental sciences and behavioural and social sciences, including current digital modelling tools as part of preliminary design research and in developing the concept design to optimise the performance of the project for its users. "

However, it has also been noted that Performance Criterion 38 (all career stages) suggests, by using the wording "digital modelling", that 2D CAD documentation is not adequate, and similarly hand drawn documents are not adequate:

Be able to complete and communicate on-time accurate documents, including drawings, models, specifications, schedules and other relevant modes of information using appropriate digital modelling systems.

Perhaps the "digital modelling" requirement should be for buildings of a certain scale or complexity.

10 PROFESSIONAL CAPABILITIES

Reducing the current five domains to three groups is a welcome simplification that will assist in providing less confusion for education providers, graduates, assessors and other users. 'Knowledge Domains' retitled 'Professional Capabilities' provides clearer articulation and context.

However, there is some concern about the integration of 'Practice Management' and 'Professional Conduct' into one **Unit of Competency**. Professional conduct is considered universal across all areas not just practice management.

The split in **Professional Capabilities** is a concern. Good communication, and environmental and ethical practice are all basic good professionalism. There are other overlapping issues, such as why under 'Design Delivery, Management and Execution' is there a need for 'The provision of professional services . . . 'when one of the **Professional Capabilities** listed is 'Professionalism'. Could this not be simplified to 'The provision of services . . . '.

It is agreed that 'Professional capabilities' should be at the centre of what architects do. For instance, Professionalism is intrinsic to the consideration and practice of Ethics, and the practice of environmental considerations in design. Professionalism should be encompassed in all three Capabilities. Therefore the term Professionalism is not supported as one of the capabilities. Another title for this capability would reduce the repetition and overuse of the term 'professionalism' as well as including a fundamental aspect of the expertise of architects.

It is further suggested that the omission of 'Disciplinary Knowledge' should be reconsidered for inclusion as a specific Professional Capability in lieu of Professionalism**,** as follows:

> *Professional Capabilities are divided into three core areas of capability:*
>
> 1. *Discipline*
> 2. *Communication*
> 3. *Environmental and Ethical Practice*

Disciplinary knowledge is what makes architects; it provides architects with the distinctiveness of what architects do.

Architects need to be educated and trained in the 'Discipline' of Architecture, to consider complexities of design as an engaging, thinking, socially and culturally impactful process. Architects need. to be taught to contribute beyond the production of buildings, and to consider the future of human habitation in terms of health, wellbeing and sustainability. Architects need to be trained to consider imagination, innovation, multi and trans-disciplinary thinking as essential to our society and the economy of the future.

More than just Professionalism, it is architects' expertise in 'Disciplinary knowledge' that upholds the profession and sets architects apart from other building design providers. Removal of 'Disciplinary knowledge' could possibly move architects further into instrumentalism, and further undermine an architect's professional value.

11 COMPETENCY PROFILES

The 3 levels of 'Competency Profiles' are welcomed. Strengthening the importance of these profiles, by more clearly differentiating between the performance criteria across the profiles is recommended. In some cases, the requirements of the profiles are inconsistent.

For example, Performance Criteria 1 and 3 require demonstration of understanding at registration, and compliance post registration. However, Performance Criteria 9 and 12

require knowledge to provide objective advice and apply legal and ethical obligations at both registration and post registration.

Additionally, the skills and knowledge within criteria could be grouped differently.

For example, Performance Criteria 12 does not reflect the expectation that students of architecture comply with copyright and moral obligations, while at registration, an architect is expected to have knowledge of obligations relating to employment. An architect is expected to apply obligations in all areas post registration.

The definition of the competency profiles is considered potentially problematic. At the point of registration, the candidate is assessed in the scenario that they may, go out tomorrow and form an Architectural Practice so they are assessed at this level. This could be regarded as being 'Post registration'. The CPD process could then be strengthened by being tied back to NSCA competencies which can then be advised to govt bodies who require some form of substantiated knowledge on building professionals continuously updating skills.

The three professional capabilities (professionalism, communication and environmental/ethical practice) do not appear to have been adequately addressed in all the competencies

There are also ongoing issues defining and limiting architect's scope around cost and budget advice – alignment with insurance climate/practice is needed.

12 COMPETENCIES BEYOND FORMAL AGREEMENTS OF ARCHITECTURAL SERVICES

The ability to "think outside the box" is considered a critical skill not reflected in the proposed Performance Criteria. The skills required to extend 'architectural services' beyond meeting a client brief and complying with formal agreements include the following abilities:

- critically interpret client briefs and project requirements in concept design
- to respond to and integrate feedback from authorities and review processes in detailed design and documentation
- to act independently in response to issues arising during construction

For example

Unit of Competency: Conceptual Design
Architects are in a position to be more visionary at this conceptual stage and informative to the client of e.g. more environmentally / economically /culturally responsible options.

Recommendation: The overview paragraph allows for the architect to offer 'alternative solutions' as well as 'meet the clients brief'.

- **Performance Criterion 56**. An Architect should be encouraged to think independently and ethically even and to think beyond the confines of the contractual agreement. This is relevant when in a design and construct contract, for example, and the reporting product substitutions is required even if the Architect themselves has no process within the contractual arrangement.
  Recommendation: Include professional and ethical consideration of the design delivery, management and execution processes.

13 FORMAT AND LANGUAGE CLARITY: AMBIGUITY AND PLAIN ENGLISH

There is consensus that the text needs to be reviewed to ensure that it is all in plain English and language that is open to interpretation is clearly defined.

There is considerable concern about ambiguity of some words or phrases and that interpretation may be too subjective. It is suggested that the vague nature of some of the competencies could be of concern from an Accreditation Review Panel perspective.

The following are some examples that have been identified:

The professional capabilities listed on page 1 and 2 appear to have some overlap.

- "Professionalism" includes professional ethics
- "Environmental and Ethical Practice" includes ethical business practice
- Are these different?

- Similarly, 'expectations of society' is difficult to quantify and is open to interpretation and judgement.

- Terms like 'Have knowledge of . . . 'or 'Understand the purpose of . . . ', used throughout the Performance Criteria for graduates of an architectural program, are also vague as to how they can be evidenced.
- For consistency the second last dot point on under 'Professionalism', should start with 'Having the capacity to . . .' rather than 'Have the capacity to . . . '.
- Prioritising Design for Longevity…this point is not very clear. Longevity of what? – building and places? If yes, worth to mention it.
  Maybe design for adaptability, and reuse/recyclability rather than longevity?

- "Sustainability" needs a clear definition as it is used in varying forms throughout the document. Is this referring only to environmental sustainability or does it include human, social, economic and "timeframe" sustainability?

Specific Performance Criteria Comments and Suggestions
Performance Criterion 3: *"Have knowledge of the principles of project planning and its implications on stakeholders and project costs".* The 'principles of project planning' are stated here like a universal truth, as if there is a singular professional agreement on them, yet that level of professional agreement on principles is doubtful.
Performance Criterion 15 ("Post registration an architect will") Grammar error / missing words: *Be able to apply (?) principles of project and staff planning and resource costs to establish realistic and sustainable timeframes.* Should "sustainable timeframes" be "achievable timeframes"?
• **Performance Criterion 13.** Needs to be clarified. Not sure what is meant by "client relationship management systems"?
• **Performance Criterion 16** ("On graduation from an architecture program a graduate will") Architects aren't cost estimators. Should this be revised to read as follows? *Understand the purpose of project feasibility assessments, including research of site constraints, opportunities and risk to assist cost estimators in determining preliminary cost analysis.* Or some version that aligns more with an architect's responsibilities - as do the competencies under "At the point of registration".
• **Performance Criterion 18** ("At the point of registration") Similar to Performance Criterion 16. Should this be revised to read as follows? *Be able to assess project budget (or work with quantity surveyor to assess project budget), and timeframe against project requirements and objectives, relevant legislation, building codes and standards.*
Performance Criterion 20. This should be split to demonstrate "understanding" upon graduation, and "application/skill" at registration
Performance Criterion 25: *"Be able to evaluate design options in relation to project requirements and in terms of the heritage, cultural and community values embodied in the site and context".* This suggests a 'community' that shares a common understanding of heritage, cultural and community values – which is unlikely.
Performance Criterion 35. Needs to be clarified. Is this referring to "concept design documentation" or documentation based on the approved concept design? Is this a duplication of criteria 42?

Performance Criterion 40. Possible to delete? This is too specific and based on a particular procurement method/s. There should not be any criteria which are only applicable "where appropriate". This is inherently covered in criteria 10 & 43.
Performance Criterion 41. Possible to delete? This is too specific and based on a particular procurement method/s. There should not be any criteria which are only applicable "where appropriate". This is inherently covered in criteria 10 & 42.
Performance Criterion 42. Needs to be clarified. Is this referring to "concept design documentation" or documentation based on the approved concept design? This criterion might be separated into several criteria to ensure that it has a more significant weighting
Performance Criterion 44 (At the point of registration) Architects are not cost estimators. Should this be revised as follows? *Be able to resolve and present a detailed design solution, including documentation, working with a quantity surveyor to provide indicative budget and necessary timeframes to obtain client and stakeholder approvals.*
Performance Criterion 58. Possible to delete? This is too specific and based on a particular procurement method/s. There should not be any criteria which are only applicable "where necessary". This is inherently covered in criteria 10, 57 & 59.
Performance Criterion 59. There should not be any criteria which are only applicable "where necessary".
Performance Criterion 60 – why is there a need to include 'where required' when 'understanding appropriate methodologies for undertaking post occupancy evaluations' will do.

Although difficult to implement, it has been suggested that applying a weighting to the criteria based on their complexity or importance might be helpful; i.e. criterion 19 should not have the same weighting as criterion 42. Perhaps some of the more significant criterion could be expanded into multiple criteria to ensure that they have a more significant weighting, and the less significant criterion could be combined to reduce their overall weighting.

In an effort to expand the criteria to allow for current procurement methods other than traditional superintendent roles, some of the criteria are too specific.

Division into succinct Bullet Points (for assessment and CPD) –

One Institute member considered the current document of greater merit than the proposed draft. This has been included as it provides a complementary point of view and was submitted with concern for the profession and after careful consideration. The suggestions that the new document is problematic because it contains multiple competencies within one competency and provides less reference is given to compliance with authority requirements are worth consideration:

The draft describes the required architect's competencies in general concepts, whilst the document itemises each competency separately in concise bullet points, avoiding repetition and providing clarity.

In summary: General and over-arching terms:

The draft uses general terminology with a single sentence including many different competencies, rather than the current document which uses short bullet points addressing one item at a time. The draft would make it more difficult to assess conduct since one part of a sentence may have been met satisfactorily, and another part not. It would be open to interpretation and wording. Several competencies are repeated in different clauses in slightly different ways, ie. Time, Budget, documentation. The value of isolating the services into concise bullet points is that each part can be assessed, also CPD points topics can be addressed separately.

1. **Examples:**

Clause 16: "Be able to identify, analyse and evaluate client project requirements and objectives using qualitative and quantitative methods and, where required, contribute to the assessment of project feasibility / viability."

Clause 18: "Be able to assess project budget and timeframe against project requirements and objectives, relevant legislation, building codes and standards".

Clause 44: "Be able to resolve and present a detailed design solution, including documentation, indicative budget and necessary timeframes to obtain client and stakeholder approvals."

The Clauses are phrased such that should a client's project result in not being viable or meet objectives, etc., it may be interpreted as being the architect's responsibility which could lead to a formal complaint or possibly affect their Insurance. As those in practice know, client's objectives often change and circumstances beyond an architect's control can lead to non-viable projects.

2. **Core Items addressed in passing:**

Less reference is given to compliance with Authority requirements in the draft than in the current document.

In the draft:

- **Clause 18:** it is mentioned as part of a longer sentence including budget, time, requirements, objectives;

- **Clause 42:** it is mentioned as part of a longer sentence including time, accuracy, contracts, procurement etc.

In the current document it is clearly stated in:

- **Clause 3.4:** "Design response incorporates assessment and relevant legislation, codes and industry standards"

- **Clause 5.3**: "Evaluation and integration of regulatory requirements".

14. EMERGING ARCHITECTS AND GRADUATES NETWORK (EMAGN)

The following is the contribution by the Emerging Architects and Graduates Network (EmAGN):

EmAGN is generally supportive of the revisions and welcome the move away from a linear framework to reflect more modern practice. They:

- welcome the inclusion and acknowledgement of Aboriginal and Torres Strait Islander perspectives
- request more emphasis on environmental considerations.
- are concerned the prescribed differences between approaching registration do not necessarily align with the steps set out in the Architects Award 2020

Of particular concern to the EmAGN demographic is the lack of definition within 'post-registration' leading to confusion for progression to pay levels as set out within the Architects Award 2020, given it specifically references the National Competencies below:

> '***(a)*** *A Registered Architect will move from the Entry to the 1st and 2nd pay point rates upon the demonstration of acquisition of competencies as set out in the National Competency Standards in Architecture adopted by the Architects Accreditation Council of Australia in addition to those accepted for advancement to the current classification level.'*

EmAGN echoes SONA's concerns below about meeting societal expectations and argue that Architects should be pushing boundaries and be future thinkers rather than meeting current societal norms.

15 INSTITUTE STUDENT MEMBERS (SONA)

The SONA Executive team report that "the revised NSCA is very clear in outlining the sections for the competencies making it easy to follow and interpret." Further suggestions by SONA include:

- In the concept design competency, it notes that a coherent design proposal is one that, "meets the client's brief, expectations of society and is capable of compliance with planning controls and construction codes". This is a pedantic point in language choice in that, "expectations of society" may not necessarily be a high enough standard, particularly when general society may not be educated in this area and could have quite a low bar. Should Architects not have a responsibility to advocate for an architecture beyond societies bare minimum?
- It may be pertinent for the Performance Criteria for Practice Management and Professional Conduct to include consideration for workplace dynamics and the development of soft skills for both students and professionals. While some naturally develop these skills over time, some do not. The nature of the Architectural profession makes communication and collaborate essential, and without these interpersonal skills is it feasible to realize quality design outcomes.

- In the spirit of preparing graduates for the workplace, and the impact the NSCA has on shaping university curriculums, it may be important for graduates to have knowledge of the following sections, which are currently neglected in the NSCA:

- **Section 18:** graduates should be introduced to a basic understanding of how to read, understand and apply building codes.
- **Section 35:** graduates should be able to understand the process of producing documentation of concept design
- **Section 57:** graduates should understand the process of completing schedules and documentation
- **Section 59:** graduates should have a basic understanding of construction drawing sets

16 CONCLUSION

Recommendation →	The Institute remains committed to the imperatives outlined by CAST in this response including the FNAWG and Cultural Reference Panel response. This Review of the NSCA is a timely opportunity to address these imperatives.

It is hoped the suggestions included in this response are incorporated into the NSCA. Notwithstanding that, the proposed NSCA achieves an aspirational and far-sighted directive in its ambition for the architectural profession. It outlines 'Professionalism' in Architecture and emphasises the value that architects can provide society in terms of cultural, ethical and environmental leadership and responsibility. The revised NSCA places architects in a better position to advocate for the profession, and of the quality of the built environment.

Written and compiled by

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