



31 January 2023

REVIEW OF THE CONSTRUCTION INDUSTRY TRAINING FUND ACT 1993 (SA)

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation representing over 12,500 members across Australia and overseas. Close to 1000 of these are based in South Australia and are supported by the SA Chapter.

The Institute strongly supports enhancing the competency and capability of architects, engineers, builders, trades persons and others in the building workforce through appropriate training and professional development activities. While the Institute's primary focus is the architectural profession, we recognise that training across the sector is important to support skills development and retention and to deliver quality construction outcomes.

Support for the CITF Act

We strongly support the retention of the training levy and the principle aimed at creating more efficient and effective arrangements for enhancing training initiatives in the building and construction industry in South Australia. Skills development and retention are critical to a sustainable construction sector.

We also support the review of the CITF Act to improve its effectiveness and consistency. The Institute supports the Propositions for feedback presented in the Issues Paper. In particular, we support:

- Inclusion of activity associated with generation, supply and transmission of electricity, mining and petroleum, and by employees undertaking work for an employer. These activities involve people who are also able to work across more traditional building construction activities and these projects should contribute financially to training for the sector.
- Maintaining the current levy rate of 0.25% of the estimated value of building or construction work.
- Allocation of a proportion of the CITB fund should support holistic and cross sector programs, in recognition of the interdependence of participants across the sector and in non-traditional roles. Administration activities should also be budgeted for.
- Clarification of who is responsible for payment of the levy.
- Review of the participants able to access training funds to better reflect evolving practices in the construction sector.



Definition of Construction Industry and Estimated Cost

The current definition of the construction industry in the CITF Act is provided in Schedule 1 and refers to *'the construction, erection, alteration, repair, renovation, demolition or removal of'* buildings and a variety of other construction activities. While this was initially taken to include work undertaken by consultants, subsequent amendments to the Act have excluded consultants from accessing financial support for training purposes. However, without the input of consultants, building and construction projects would be significantly compromised or unachievable.

We support review of this definition to better reflect evolving construction practice. We understand that consideration is being given to inclusion of people involved in off site fabrication and other emerging areas of construction activity. This definition should be further expanded to be inclusive of all participants in building and construction activity.

Definition of Value of Building or Construction Work

The estimated value of building or construction, as defined in Schedule 1A, which is used to calculate the levy payment, includes *'the value of the labour, necessary services and fees (including professional fees) payable in relation to the work'*. Therefore, while the levy includes a proportion of funds raised against the professional fees charged for projects, the professionals involved in the delivery of building and construction projects are unable to access support for training.

The Institute believes that this is not consistent with the Part 6, Clause 32 (3) of the Act, which states that *'A training plan must be prepared on the basis that money from the Fund for the provision of training will be allocated to each sector of the building and construction industry in approximately the same proportions as the resources of the Fund have been contributed by that sector.'* While consultants are not defined as a sector of the building and construction industry in the Act, consultants are integrally involved in building and construction projects across all sectors defined in the Act and the levy collected in relation to their fees contributes to the Fund.

We also note that other management and administrative participants involved in building and construction activities are able to access support for training and that the CITB subsidises training in design, drafting, WHS, legislation and compliance. Distinguishing between management and administration staff employed by a contracting business as opposed to those employed by a consultancy business appears to be an artificial distinction, and one that works against the objectives of the Act.

At present there is no Government support for training within the architectural profession or the other construction professions. To encourage adequate levels of training within these professions, as supported by the Recommendations emerging from the Building Ministers Forum (BMF) and Shergold Weir Report, and to ensure high skill within the industry, we reiterate that we strongly believe building design professionals be supported by training funds.



What we would like to see

- Architects and construction consultants are able to access WHS related training – White Card Training, Working Safely at Heights, WHS Compliance etc – which are required to meet contractor’s site access protocols and to safely undertake site related activities.
- Support for contractors who provide onsite programs for architecture students who want to gain an improved understanding of site management, construction methodology and materials. This could be offered as an elective within the five-year tertiary architecture program to assist with management of student numbers.
- Support for architectural practices that employ graduates and provide them with meaningful opportunities to develop site skills and construction knowledge to facilitate their registration as architects.

Risks of not doing this

- Architecture students graduate with a limited knowledge of materials and construction, which reduces their initial employment opportunities and increases the time taken to gain the required experience to register as an architect. This impacts the pipeline of skilled professionals within the sector. ⁱ
- Consultants’ construction knowledge is not as developed, resulting in uninformed design decisions, a lower standard of documentation and less effective communication with contractors.
- Loss of skills and expertise in consultant practices, specifically in relation to construction methodology and process and site inspection capabilities.
- Consultants undertaking onsite activities do not have access to regular WHS training and are at increased risk of injury or acting in a way that causes a hazard to others on site.
- Increased risk of conflict and unintended outcomes during construction.
- Lower quality of construction.

Benefits of providing targeted training for architects and other construction consultants

- Improved understanding of construction methodology and process resulting in more informed design.
- Improved construction documentation based on a better understanding of how contractors and subcontractors access information and undertake construction.
- Improved site safety.
- Consultants provide valued and knowledgeable services on site, improving oversight of works for quality and compliance and reducing conflict.
- Skills are retained and developed within consultancy professions to the benefit of the sector, clients, and the community.



Conclusion

The Institute supports the review of the CITF Act and recommends broadening the definition of the industry, to include the design professionals. This will mirror the symbiotic and co-dependant relationship of the construction and design industry and strengthen national initiatives stemming from the BMF.

The Institute welcome this timely opportunity to ensure that architects, and allied construction professionals are no longer excluded from enhancing and improving their skills and have access to the funds levied on every project on which they are involved.

Please do not hesitate to contact us directly or indirectly for any assistance we can offer.

Yours Sincerely,

Nicolette Di Lernia
Executive Director SA
Australian Institute of Architects

ⁱ Changes to tertiary degree structures and the minimum level of qualification for academic staff within Australian Universities are making it increasingly difficult for practicing architects to teach into tertiary architecture programs. This is particularly true with the Masters program, which is required for registration as an Architect. This is resulting in students being taught construction subjects by people with minimal if any experience in architectural practice.

It is also increasingly difficult for universities to provide access to construction sites for students due to increased student numbers, insurance implications and increased WHS requirements. The cumulative impact is a reduced knowledge of construction and materials for many graduates.