

June 11, 2000

Submission to the Productivity Commission 2000 'Review of Legislation Regulating the Architectural Profession' Draft Report' Melbourne, May.

The following is a professional profile for your information I am a Sole Practitioner and have been involved in meetings with the Sole Practitioner's Group to date. I also have contributed to and support the submission by this group to the Productivity Commission.

I have made further comments to the Sole Practitioner's Group submission, summarising my opinion of certain important points on the following pages.

I have been, and am currently, involved in all forms of architecture from large scale commercial projects to medium density housing and residential projects. I provide a full architectural service including specialised interior design. I am a part-time tutor in third year design at the Queensland University of Technology.

I have worked with and contracted draftsmen and women, and also been involved in fixing up problems associated with certain 'building designers'.

Whilst we are practising in changing times, I feel there is a need for regulation, by the Board of Architects, or the architectural profession for the protection of the consumer as well as the Built Environment. I also believe that there are issues that need review - by the State Board of Architects as an independent body. These issues can be resolved with a recommendation to the productivity commission.

SOLE PRACTITIONER: Tania J Coward B.Arch (QLD)

QUALIFICATION: Associate of The Royal Australian Institute
of Architects.

Bachelor of Architecture 1986.

Registered Architect 1988.

Certificate of Practice Management
and Development 1990.

EXPERIENCE: Trained in the offices of.

Geoffrey Pie

Les W Jones

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Within the above offices Tania J Coward was associated with a variety of projects ranging from residential, to high rise documentation. Tania J Coward has worked on the documentation of Pie Residence - Peregian Beach, Queensland R.A. LA House of the Year 1986. and R.A. I.A Robin Boyd Award 1986 for the Australian House of the Year 1986; 200 Mary Street office building, 8. 0. M.A. Award 1986, and the Heritage Hotel Brisbane winner of the 199 I Queensland Commercial Building and Civic Design Award. Since 1986, Tania J Coward has been the Project Architect for various residential and commercial projects, including a resort in the East Kimberley Region of Western Australia.

In 1992, Tania J Coward commenced her own practice-

THE NATURE OF THE PRACTICE OF TANIA J COWARD ARCHITECT.

Tania J Coward is a Sole Practitioner. The Practice has purposely been kept small (no more than 5 persons on staff for several reasons:

The desire to be personally involved in projects from early design through to the final construction stages.

The desire to keep in touch with all areas of Architecture.

The title 'Architect'

The definition of 'Architect' In the report is incorrect.

An Architect Masterminds a project encompassing all design issues from the external to the interior environment. The Architect is the project design leader, head consultant and documentor of the intended design- The Architect is not a supervisor, but an administrator and inspector of the building works and certifier. The Architect acts as Agent for the Proprietor/Project Owner in assessment of the value and certification of the works.

The public have a perception that the term Architect indicates a level of education, knowledge and expertise with regard to the design of buildings and the provision of services. The public expect this level of qualification when they approach all Architect to design for them. Similarly, when the public go to a Doctor they know that he/she has a level of qualification for the health problem.

Presently there is no confusion amongst the public that the Architect is at the least a qualified designer. The public can easily and readily check the qualification of an Architect, and (lie range of professional services available.

What will happen is that building designers of various education backgrounds will immediately proceed to call themselves Architects resulting in confusion and potential for deception and a lack of quality control. The two tier system of registration suggested will not work - standards will fall.

If the title were to change, it would take many years to amend not only legislation but to educate the public. It is not a quick two year fix with marketing campaigns.

The schools of Architecture in Australia, are considered among the best in the world, with other countries sending students to gain qualification in Australia, bringing valuable income for our universities. For further information regarding the curriculum for architectural students, I would suggest the commission conduct discussions with both, schools of architecture.

The deregulation of the title will undermine the aims of our Architecture schools with students opting for lesser qualification due to cost and time.

There are previous cases whereby the title has been deregulated only to result in many problems culminating in a costly reversal back to the regulated title (eg. New Zealand and England).

The report incorrectly states that Francis Greenway, Walter Burley-Griffin and Frank Lloyd-Wright were designers not Architects. All three were highly praised architects, so called by the standards of their time, which, involved long periods of articles with practising architects. This system applied until the 1920's. They are known for many great masterminded architectural achievements illustrating their ability to encompass not only design, but also master planning ingenuity, Their works encompass

commercial and residential scale projects incorporating both the external space and interior design.

Hence the term 'architectural' is used to describe such design masterminding not just a single design element as perceived by building designers.

The Architects Act

The Act sets out an accreditation process for individuals to be able to call themselves And 'Architect.' The existing process protects the public by imposing a level of qualification required.

The Act addresses high professional standards required eg education and professional experience prior to registration. The public need assurance that there is a level of Architectural education.

The Act could be reviewed and developed further to bring it up to date with regard to consumer protection and procedures for same, including allowing architects to advertise more freely.

It should be uniform throughout Australia and be relevant for the next 20 years to accommodate modern trends and be administered by each state.

The Act is a public document.

An independent third party body administers the Act - the Board.

The Act does not preclude others from competing in the market place,
A separate disciplinary body should be appointed by each state government.

Board of Architects

The Board needs to be convened nationally, with a local administration.

The Board sets the education standards of Architects.

The registration of Architects by an independent body is important to ensure quality control over successful candidates' qualification.

It currently works well as a third party body to administer the Act.

It is part of the public sector with the list of registered architects in a publicly gazetted document. It should also have an internet facility.

The Board's National Registration of Architects is funded by Architects - the public benefits without cost.

The registration exam process ensures that applicants have a high standard of education, level of expertise and skill in the practise of architecture. Note that currently there is a requirement for the candidate to have experience in the production of documentation, showing a level of expertise in dealing with materials and knowledge of structures.

Candidates for registration having gained the required tertiary qualification, should submit a full schedule of their tertiary subjects and grades for the past 6 years together with their practical experience logbook (as currently is the requirement) to the Board prior to the examination by the)Board. The Board have their exam syllabus in place for the candidates to consider and then take.

This exam process is open to public scrutiny.

The Board should include members of the public, however, it needs to be personned by a majority of Architects with the appropriate qualification in place to administer the Act.

Building codes and other regulations alone do not provide acceptable built environments. They must he applied and interpreted by highly educated building industry professionals 'Architects' to achieve the intended result.

The current registration process does not restrict competition in the field of building design. There never has nor ever will be the intention for it to do so.

Comments of the Commission

The Commissions' draft report illustrates its lack of understanding of the role of the Architect in the building process. The Architect is not a supervisor as mentioned in the report The Architect is a Masterminder, Project Design Leader, Head Consultant, Documentor, Contract Administrator, Works Inspector, Certifier of the works., Agent for the Proprieter/Project Owner.

The Commission comments on the services of the 'Architect'- The Architect has the education to offer the broad range of services than other building industry groups eg building designers, and is better qualified to provide them- Architects are providing full services contrary to the opposite in the Draft Report.

The Commission has highlighted the actual problems of building designers lack of information on the services of the Architect and in so doing has missed the point of the importance of education and expertise of the qualified Architect in providing for the consumer's needs.

As mentioned earlier our education and registration system does not attempt to restrict competition by others with equal qualifications as architects.

However, should the title 'Architect' deregulated and the process of registration be abolished then not only will the consumer be effected but also the built environment will, in time, reflect a lowering of the current high standards/ quality control process. This will place Australia out of step with the rest of the world.

I recommend that the Boards of 'Architects' be contacted by the commission to conduct further discussions of commission enquiries. The Boards should convene a forum for Architects to resolve outstanding issues to report back to the commission. The Boards should be responsible to review the Architect's Act to bring it up to date.

The draft report has many gross misrepresentations of the facts with frightening repercussions throughout not only the building industry, but also for the public consumer should it be adhered to.

This is contrary to the spirit of (CPA) Competition Principles Agreement on which this review is based. (Refer to clause 1 of the Draft Report)

(signature)

Tania J Coward
ARCHITECT