

To: Productivity Commission

**SUBMISSION FOR THE REVIEW OF LEGISLATION
REGULATING THE ARCHITECTURAL PROFESSION**

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GENERAL

1. As a registered Architect in Queensland I wish to respond to the above referred Productivity Commission Report. This response is a brief overview of some of the effects of the implementation of the report. It is not meant to be a detailed analysis of the same.

2. I did not make submissions to the Commission previously because I had nothing to add to the matter.

This does not mean that I am disinterested in the outcome or findings of the Commission and it should not be interpreted as such. It simply means that I don't believe the existing system of registration of Architects and associated regulations should or need be changed. I therefore had no changes to propose to the Commission when it first sought submissions on this matter.

3. The system that exists, which has taken possibly more than a century to develop, exists for good reason. It protects the public by setting a standard for persons to achieve before being able to be called an 'Architect'.

The logic of the laws that have been written to enable this structure to be formed are very simple. In brief, before a person can practice as an Architect and be 'let loose on society' they must first demonstrate that they are capable of achieving those standards required to practice as an Architect. In short, they must 'make the grade'.

4. Your report argues that this standard be abolished and that anyone and everyone can call themselves an Architect

You also state that there are peripheral and indirect laws which *may* protect the public from persons acting as an Architect when they are clearly not qualified to do so.

5. I foresee the cost of your 'theoretical' experiment to be very high and that it will be our Australian community which will end up 'footing the bill' for the costs of changing the present structure, the failure in delivering any worthwhile benefits to the community and for the problems that these changes will bring.

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NEGATIVE EFFECTS

6. I don't have the capacity to summarise all the aspects of your proposed changes but wish to draw your attention to some basic flaws in your arguments for the proposed changes.

The first premise is simply before you change something, you should always have something better to replace it.

Your report recommends changes to the legislation of Architects which sounds simple in itself.

However, these changes will, in effect, dismantle the whole structure of the following:-

- the protection of the public by ensuring only properly qualified people can call themselves an 'architect'
- practice of architecture in Australia
- both Federal and State Legislation and associated bodies established to control all architectural practice in Australia
- the education of all Architects in Australia, both now and in the future
- the established academic 'business' of the training of Architects from both Australia and other countries
- the present marketing of Australian architectural services throughout the world (presently becoming more important due to our high standard of 'Architects' in Australia)
- the legal and contractual arrangements which exist where the term 'Architect' is used (including the legal and contractual duties of an Architect).

The above list is not exhaustive, but serves simply to explain that the changes proposed will have far reaching effects and these effects are **MOSTLY NEGATIVE.**

POSITIVE EFFECTS

7. There appears to be three main positive effects of the implementation of the recommendation of the report as follows:-

- (a) large house builders will be able to advertise their houses as being 'architecturally designed' even though they may have been designed by building designers as they are now known.

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At present, marketing in this way would constitute false advertising but this would change if there was no restriction on the word 'Architect' or its derivatives.

This group, with the backing of the industry groups associated with the same, will surely be given a marketing advantage in the short term when permitted to advertise as such

However, in the long term, as the term 'Architect' becomes understood in the community as a meaningless term, this marketing advantage will disappear.

- (b) Building Designers will be able to call themselves 'Architects'.

This effect will be a 'bonanza' to this group because they will achieve the status of Architect without the necessary pain, sacrifice, money, hard work, study and intellectual capability necessary in becoming an Architect.

- (c) 'Time' will be saved by those wishing to become an Architect. Instead of spending five (5) years at an approved architectural school and two (2) years practice and study prior to registration (i.e. a minimum of seven (7) years) everyone will be able to call themselves an Architect without this waste of time.

For those wishing to attain some academic qualifications they may enroll in a building designers course at a local T.A.F.E. similar to one I recently learnt of. The applicant in this case attended a two-night building designers course and was then admitted with a 'GOLD CARD' builders designers licence from the Queensland Building Services Authority.

Assuming this applicant had the intellectual capability and determination to become an Architect, and if this applicant worked during the day, then the same would have saved a minimum of seven (7) years in time as opposed to the present system of registration of Architects.

In summary of this item, one must ask the question that although the building designers and large house builders will benefit by the proposed changes put forward by the Commission, **DOES THE AUSTRALIAN PUBLIC BENEFIT BY THESE CHANGES?**

The answer to this question is emphatically **NO!**

COSTS OF CHANGE

8. The report argues that it will be possible for the present architectural industry to identify itself separately to the present non-architects and that the R.A.I.A. is well placed to take this 'lead' role.

What the report fails to address is, if this change does occur, **what are the costs** of this identification?

It should be noted that it will be necessary to explain to the Australian public that the new role of the Architects are not Architects as they once knew it and that the industry groups (e.g. R.A.I.A.) represent proper Architects as previously known.

It will be like the old song "tie a yellow ribbon round the old oak tree" and then finding a hundred yellow ribbons tied around trees. The means of identification, the yellow ribbon, becomes meaningless when every tree has one.

This is all confusing and it will take a huge advertising budget spread over many years to change this perception held by the Australian public.

An example of this can be seen in the marketing of the G.S.T. The Federal Government has spent in excess of \$350 million on advertising the changes of the G.S.T. and to date there is still extensive confusion over the issue.

The effective change of the term 'Architect' will take much longer than one year to effect and the advertising and marketing of this aspect must surely extend over 20 years or longer.

Of course, it's the Government (and indirectly the Australian public) who must pay for this marketing and the effects of this change because it would be the Government who are the ones who are instigating the change.

When reading the report it was noted there was no mention of these costs. Surely if this report was driven by an economic basis then all costs of the proposed changes should have been quantified and detailed in the report.

If the commission expects the present architectural profession to pay for this imposition placed on it by the proposed changes of the commission then it must realize that governments must be accountable for their actions and that this cost burden must ultimately rest on those who cause the changes.

After struggling through the effects of the governments G.S.T., it could be rest assured the Australian public will not be keen to foot the bill for **changes that are made for seemingly change sake.**

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COST BENEFIT

9. The main aim of the commission was largely to find out ways of making the building industry more cost effective by reducing restrictive practices which may exist in the architectural profession.

Prior to any changes at all being made as a result of this enquiry and report, the report must demonstrate **what savings will be made** to the Australian public if the changes recommended by the report are adopted.

When reading the report it is noted again there is a **vacuum** when it comes to identifying these savings. It presumably found that there was **no savings to be made.**

Consequently, the Australian public will surely ask the question – **“Why change anything”?**

It would appear this report has **not been subject to economic scrutiny** because of its failure to identify this very basic purpose of providing savings to the Australian public.

Even before one considers the huge costs (as previously referred to) which the Australian public and construction industry will be burdened with, this report has failed to identify any financial gains to the Australian community. In this fact alone, **THIS REPORT FAILS**

COSTS OF PRESENT ACCREDITATION

10. Another cost issue that must be addressed is the cost each Architect has spent in achieving the qualification of ‘Architect’ under the present system.

Once the term ‘Architect’ becomes meaningless by being available to any person, the ‘value’ of those who have achieved this status would be lost.

Essentially, why would any one attend a University for five (5) years and sit for a two (2) year post-graduate assessment programme if the person could achieve the title of Architect by doing nothing or maybe attending a two-night session at a T.A.F.E. College? Obviously people will choose the easier option as people tend to do.

I do not have the facilities to calculate the net present value of all costs associated with the education of an average Architect, but if one uses the overseas student costs as a benchmark, these costs may be in the order of \$200,000-00 per Architect.

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Based on these assumptions and if one considers all Architects in Australia, then a very indicative value of cost 'value' of the present architectural profession would be in the order of \$1.72 billion.

On top of the other costs indicated in Item 8 previously, the Australian Government, or those responsible for this change, may have to bear the liability of a \$1.72 billion claim by the architectural profession to reinstate the loss of the value of their present accreditation.

As indicated previously, the quantum of these costs is outside my capability but this item attempts to note that there are risks and costs associated with this item that need to be addressed and quantified prior to proceeding with the changes outlined in the report.

R.A.I.A. ROLE

11. The R.A.I.A.'s role on this issue is important. Despite this, the model idea of registration controlled by the R.A.I.A. instead of the state Boards of Architects is a model proposal that has not been fully understood by the institute members.

This model has never been put to a vote by the institute and until it has been, it can only be viewed as a proposal for discussion purposes only.

I share the view of the vast majority of my colleagues in the Institute that the retention of the registration of Architects by the various State Boards should be retained.

OVERSEAS ACCREDITATION

12. Should the Commission's changes be implemented, there would be a problem with international recognition.

One problem would be that although the term 'Architect' is a valued commodity internationally, it would become valueless in Australia.

Contrary to the Commissions inaccurate statements made about other European countries' methods of architectural registration (or lack of) the de-valuing of the term 'Architect' would be out of step internationally where standards are increasing not decreasing.

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I will leave it to others to explain this international issue of the term 'Architect' but wish to explain some of the problems which would have been encountered by myself in regards this matter if I did not have proper identifiable architectural status from Australia.

After completing my under-graduate degree in architecture, I worked in practice for two (2) years prior to being awarded my registration as an Architect in Queensland. I then practiced as an Architect for some three (3) years prior to deciding to undertake further academic study.

The experience I had gained was extensive. It included being appointed as a District Manager in charge of a Government construction works depot with approximately 40 trades persons. This latter led to my appointment to the chief Project Manager for 49 Aboriginal Community Groups in the Northern Territory as well as being selected by a number of those communities to act as their individual architectural consultant.

Although the work was very fulfilling I still had a desire to complete further education and consequently enrolled in a Master of Architecture Degree at the Heriot-Watt University/Edinburgh College of Art in Edinburgh U.K. This was a huge financial risk to me by firstly paying for the overseas study, and secondly by taking time off work to do the same. The further risk was that I may not even pass the course.

The research work involved the improvement of industrial working environments in keeping with social-technical management principles. In essence, I was trying to improve the working environments in industry using the latest developments in technology and management.

As a part of my studies, I worked in Stockholm at a institution which specialized, to some degree, in this work. The work also required me to visit other advances in industry throughout Europe.

After approximately two (2) years I graduated and practiced in Edinburgh for some time. During this time I was pleased to learn that my research was actually implemented in industry in Edinburgh.

I draw from these experiences to explain that without proper accreditation as an Architect in Australian, I would not have been able to:-

- 1 enroll at a British University to undertake post-graduate work
- 2 to gain accreditation to the Working Environment Institute in Stockholm
- 3 to have Australian Embassy backing for the study visits throughout Sweden, Denmark, Germany and Switzerland.

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Hence international recognition of my accreditation as an Australian Architect was necessary before commencing further international study.

I see education as a 'building block' exercise. Once you have completed one part, you move on to the next. Wisdom finally comes with the understanding of the interrelation of the parts or 'blocks'. If the P.C.'s recommendations were in force at the time, it would be unlikely that I would have attempted this international post-graduate work. Furthermore, the research gained from this work would never have returned to Australia.

Since returning to Australia, I have used this research in my own practice in improving the working conditions of many working environments including both factories and commercial premises for a number of International Companies.

My work with the indigenous people in the middle of Australia was vastly different to trying to improve sometime depressing industrial buildings in Scotland and Europe, however there is a common requirement in both areas. I was **leading** in new areas **and that's what an Architect is meant to do.** The practice of architecture is far more than drawing lines and copying the work of others. They are trained to **lead.**

Architects are the **undisputed leaders** in the design of building in Australia and it is well deserved. Some can be trained to follow but it's the Architects who are **trained to lead.**

The P.C.'s recommendations are de-meaning and belittling to the practice of architecture. Don't belittle this leadership quality by breaking down institutions that has taken so long to develop! Cherish and nurture this quality and the future of our built environment will benefit.

The cost of education and 'raising the bar' is expensive. Refer to Section 10. for an indication of this. **But if you think education is expensive it is nothing compared with to the COST OF IGNORANCE.**

DON'T CHANGE THE CURRENT REGISTRATION AND STATUS OF ARCHITECTS IN AUSTRALIA