

08.06.00



THE UNIVERSITY OF
MELBOURNE

**Architects Inquiry
Productivity Commission
LB2, Collins Street
MELBOURNE VIC 8003**

Dear Professor Sloan and Dr Byron,

RE: Draft Report – Review of Legislation Regulating the Architectural Profession

The primary concern of the three schools of architecture in Victoria is that the deregulation of the Architects Acts will put at risk the ability of our schools to export educational services and attract international fee paying students.

Given reduced Government funding, universities need to attract overseas students. Under the Architects' Acts, the accreditation of architecture courses in Australia is widely accepted in Asian countries. To remove the current accreditation process is putting the viability of our courses at risk. The draft report suggests that other mechanisms can be developed but the risk of market confusion should not be underestimated. The Architecture Boards in Asian countries may see the repeal of the Architects Acts as a weakening of the accreditation processes and an indication of a lack of Australian Government support for the courses and profession of architecture. Like other professional courses meeting the requirements of Government Acts, architecture courses attract a higher percentage of fee-paying overseas students.

Further comments collated from each of the schools are included in the attachment but the issue of overseas recognition is highlighted as the most serious concern shared by the three schools of architecture in Victoria.

Yours faithfully

Clare Newton
Clare Newton on behalf of

Professor Ross King – Dean
Anthony Mussen – Head of Architecture
University of Melbourne – Faculty of Architecture, Building & Planning

Professor Leon van Schaik – Dean
Assoc. Professor Shane Murray – Head of Architecture
RMIT University - Faculty of the Constructed Environment

Assoc. Professor Nick Beattie – Head of Architecture and Building
Professor Mark Burry – Professor of Architecture and Building
Deakin University – School of Architecture and Building

ATTACHMENT

Response to the Draft Report Review of Legislation Regulating the Architectural Profession Productivity Commission – May 2000

Education

The draft is critical of architectural education and suggests that title restrictions have allowed educators to become complacent. (p89) The Graduate Course Experience Survey of 1998 seems to be the sole reason for this criticism.

Australian architecture graduates find it very easy to gain architectural employment overseas, particularly in the UK. Many of our graduates have become significant international figures in both the practice of architecture and the teaching of architecture. The May/June 2000 issue of Architecture Australia showcases Australian architects working overseas.

Architecture students invariably have high ENTER scores. They study a complex mix of subjects that cross between the science and humanities boundaries and have highly critical powers of observation because of the studio learning environment. They enter a profession that is under attack by a community that is suspicious of cultural endeavour. It is perhaps not surprising that architecture graduates provide relatively lower satisfaction ratings than more highly valued professions.

The accreditation process allows for diversity between the schools while setting minimum requirements to protect the interests of consumers. The UIA/UNESCO education policy states that a five-year university based education with at least two years of practical experience is the best pathway to architectural registration. This does not prevent people entering the profession with an alternative mix of qualifications. The AACA provides a competency-based option.

Students exiting our courses have high-level design skills backed by a range of other skills. Combined degrees have become more common in response to the increasing variety of roles available for practising architects. For example, approximately ten percent of architecture students at the University of Melbourne are also undertaking a Degree in Property and Construction.

Consumer information

The review gives an even-handed presentation of issues but surprising conclusions are reached leading us to wonder whether the conclusions might be the result of an ideological agenda to deregulate at all costs.

For example, in a strange twist of logic on page 81, the Commissioners argue that 'restrictions on title use may result in some residential consumers not being alerted to

alternatives to architects' (p81). Yet, the success of non-architects in the residential market is understood as evidence that consumers are aware of alternatives. Surely there is a greater risk of consumer misinformation if the title of architect can be used by anyone with or without training?

Another odd argument is made on page 80.

For those groups of consumers who predominantly use architects, fees are likely to be somewhat higher than otherwise because competition available from possibly lower cost alternatives is somewhat inhibited. If other suppliers in the building design and related services market were able easily to qualify as architects, then supply responses would compete away any increased returns to architects, even in the presence of additional search costs for consumers. (p80)

The reason why other suppliers of building design services do not participate as much in some sectors of work could be because consumers are aware of their skills but choose not to use them on more complex projects. The key question is whether other suppliers of building design services can provide the same level of service as architects. The concluding paragraph to the report states that 'architects have unique skills and expertise to offer the community'. We agree and we argue that restriction on the title of architect and its derivatives helps inform the consumer. Allowing other suppliers in the building design market to easily qualify as architects as suggested by the Commissioners would result in a blurring of what the term architect means and therefore a reduction of information to consumers.

Self regulation

The accounting profession is largely self-regulated. In spite of expensive marketing campaigns there is still consumer confusion about the skills of a person claiming to be an accountant. The task of educating consumers will be an unfair expense paid by trained architects and therefore their clients. Other design providers would benefit from market confusion rather than buying advertising to differentiate themselves from people trained in architecture.

Previous reviews

Deregulation is a bold step given that several similar state based reviews have reached the opposite conclusion. The recent Victorian review by Frechill Hollingdale & Page found that title restrictions, registration requirements and compulsory insurance requirements are likely to provide net benefits.

Spillover issues

As stated in our earlier submission:

The built environment should be designed to respond, not just to the requirements of the client, but to the broader requirements of the public in terms of urban context, longevity, sustainability and flexibility. (sub. 65. pp 6-7)

There is no expectation by the Commissioners that consumers will make decisions based on community good instead of self-interest. (p63) The Commissioners suggest Government intervention in the areas of pricing, planning laws and building codes is the best way to address spillover issues. (p64)

They also suggest that spillover issues can be dealt with by negotiation. (p63) The problem with this approach is that neighbourhoods may only become aware of spillover effects at the completion of a project when it is difficult to rectify the problem. Indeed, some spillover effects may not be apparent then.

The education of architecture students covers diverse subjects. Through five years of studio based design exercises backed by subjects in construction, theory, history, management, sustainability and urban design, students develop the skills to resolve complex designs that offer more than designs developed by other providers who have trained in building design or architectural drafting courses. It is relatively easy to provide a design that meets the requirements of the immediate client, It is more difficult to design within the context of a community and in anticipation of changing uses. While European countries recognise and celebrate the value of architectural design, it is disappointing to find that design is understood by the Commissioners to be little more than stylistic decisions.

While consumers may find it difficult to assess the quality of construction, they usually know what they like in design. Normally they search for a provider whose design style suits their tastes and needs. (pXXIV)

It is not clear that architects' views (often divergent) of what is appropriate in terms of design, culture and resource use, reflect the views and interests of the wider community. (pXXVII)

We suggest that architects are in a unique position juggle the interests of consumers and the wider community.

Registration requirements

There is a risk that one-off registration may not ensure current competency (pXXV) in the same way that getting a driver's license at 18 may not ensure that the driver is still competent at 50. However, architects are required to follow a code of ethics which restricts them from offering services beyond their abilities. Just as drivers can improve their skill levels with practice, architects learn new skills via project research and professional development programmes. The link between one-off registration and expertise in current construction is indirect but acceptable and extra costs associated with ongoing registration exams may not be in the consumers' interests.

International precedents:

Regulations restricting the use of the term 'architect' and/or the practice of architecture are standard throughout the world with the exception of Norway and Sweden. Norway and Sweden were cited as possible models for Australia but their political environments are quite different from ours. We do not have the benefit of belonging to the European Union (EU) or any other trading group that provides for the free exchange of architectural services.

In summary

We continue to argue for the maintenance of an Act or Acts that restrict the title of architect and its derivations in order to better inform consumers. Architects' Acts are low cost and do not restrict competition. The benefits of Architects' Acts outweigh the disadvantages.

Written by Clare Newton

in consultation with the heads of the three schools of architecture in Victoria