



3 Jupiter Grove, Trentham, Upper Hutt 5018, New Zealand  
Telephone: (04) 5277977 Mobile: 0276564811  
Fax: (04) 5277978 Email : wal.gordon@xtra.co.nz

10 April 2014

Sally Evers Qualifications Adviser  
The Skills Organisation  
[sallye@skills.org.nz](mailto:sallye@skills.org.nz)

Dear Sally

### **Final Consultation on Plumbing, Gasfitting and Drainlaying Qualifications**

Thank you for the opportunity to supply feedback on the proposed plumbing, gasfitting and drainlaying qualifications. The Plumbers Gasfitters and Drainlayers Federation support the need for good quality training and for appropriate registration and regulation in the industry but feel the proposed qualifications fall short of what the industry needs.

The Federation believes the qualifications cannot be dealt with in isolation as the training delivery method influences what is suitable and what certifying practitioners can provide to trainees. The Government has a policy framework for occupational regulation, which aims to ensure that certain occupational groups, (us included), are regulated in order to protect the public from the risks of an occupation being carried out incompetently or recklessly.

This regulation on us imposes costs and reduces flexibility and should provide assurance that competent people who have necessary skills are available to carry out work; and that these people have been sufficiently trained and meet the required industry, sector or government standards. The proposed qualifications fail to do this and create a number of problems including cost, supervision and the probability of a flood of partially trained people.

The Federation has concerns that a qualification is being created that will create technically competent trainees that don't have the appropriate level of practical skills. However we do acknowledge that this is dependent on the delivery method hence our reason for raising this issue. For example if the current delivery system of Certifiers being responsible and polytechnics assessing trainees is adopted, how can apprentices get appropriate skills training in sprinkler systems or solar when the majority of certifiers are not trained or do not partake in this sector of the industry?

If however a training delivery method was adopted that provided skills and technical training, it would be reasonable to leave the likes of sprinklers and solar systems in the qualification as hands on skills will be taught. Solar and sprinklers systems are just two subjects of many. Perhaps the qualifications should stipulate subjects that require hands on training and assessment? We certainly believe so.

For over a decade we have been putting up with an add-on system where we have ended up with very little, or no formalised training - a system of assessments where the onus and responsibilities

are all on the Certifying practitioners. This qualification does little to change this substandard system. No matter how good an employer is, very few do “everything” in the trade and teaching as part of the qualification at least ensures a broad brush stroke approach so that trainees are at least aware of what they don’t know.

We believe the qualification should be about what the trainee can do upon completion of the training, and what benefit it will be to the industry and public. Firstly look at the level 3 pre-trade training:

*“It provides trainees with an opportunity to progress to a fully credentialed tradesperson level with further study, or to terminate on completion.*

*The New Zealand community will benefit from having graduates able to assist in ensuring public safety in the provision of gas, and water services and removal of foul water.”*

This qualification is providing skills and knowledge that can only be applied if in training and under supervision of a Certifying Practitioner. People who qualify cannot “do” anything unless under supervision as detailed, and only a small percentage will progress into apprenticeships. The saying that a little bit of knowledge is dangerous is quite apt in this case as there will be a lot of people with a little knowledge that can attempt to apply that knowledge outside the regulatory environment. Anecdotal evidence suggests that certain ethnic groups in the Auckland area appear in large numbers at pre-trade courses and then are never seen again at training establishments, but are certainly seen on sites within their own community carrying out regulated work. Unless they get an apprenticeship there is NO benefit to the public, and in fact there could be a lot of detriment as we see a flood of cowboys operating in the marketplace.

The Level 4 training (we have used plumbing as the example) states:

*“The purpose of this qualification is to provide the plumbing sector with people who are suitably skilled as plumbing tradespersons and ready to apply for registration as a licensed plumber under the Plumbers, Gasfitters, and Drainlayers Act 2006.*

*This qualification allows the New Zealand community to recognise that graduates are able to legally carry out all sanitary plumbing work, essential for the safe delivery and removal of water. A licensed plumber can carry out any work involved in fixing or unfixing pipes, plumbing fixtures or appliances including; traps, waste or soil pipes, ventilation pipes, or overflow pipes and pipes that supply water. These people are qualified and licensed but must be supervised by a certifying person who is ultimately responsible for ensuring the work is done competently”*

So yet again we have a situation where, upon completion of the qualification, the trainee can “do” nothing unless under supervision. So after four years, one day the individual is an apprentice and the next they are licensed and nothing has changed regarding supervision or skills. The only thing that has changed is they pay \$400.00 registration fee per trade as a one off, \$101.00 licensing fee per licence and \$256.00 discipline and prosecution levies. Yet again there is no benefit to the public unless the trainee/newly licensed person is supervised. The reality however is that a number of these people go out and operate their own business and get a Certifier from another company to sign them off (presumably for some reward).

The following statement has also been made:

*“One key proposed change in the Level 4 trade qualifications is the inclusion of the PGD Board examination. This embedding will mean the Board’s requirements for competency will be met within the Level 4 qualification rather than being additional to, and after it. This change is subject to the industry and the Board agreeing with the inclusion, and is for the Level 4 qualifications only, not for the Level 5 qualifications”*

As explained the qualification is attempting to INCLUDE the registration exam but this would have to be consulted on with the industry and the Board so there is a chance we could end up with a qualification that does not meet the standards required to obtain registration. If the exam is embedded in the qualification we are hoping that it will mean that National Certificate = Registration, and that the costs of the exam will be included in the apprenticeship fees, thereby reducing some of the overall costs either trainees or their employers pay. It should also mean that exam preparation is included in the qualification.

With regard to Level 5 (Certifying plumbing has been used as the example):

*This qualification allows the New Zealand community to recognise that graduates are able to legally carry out and certify all plumbing work once they have met the Boards registration requirements. These people are responsible for ensuring both their own work, and the work of anyone they supervise is done competently.*

And there you have it - another qualification that doesn’t really mean much as it is reliant on meeting the Board’s registration requirements. A trainee could pass this qualification but still not be able to carry out the objective of the qualification.

It appears we have gone from a 10,000 hour apprenticeship where people were trained, and when qualified were Registered and responsible for their own work, to a system where more than 12,000 – 14,000 hours is required and there is still a chance a trainee won’t make the grade but will have qualifications which are of no use unless supervised or registered as a Certifier.

We do not see a benefit to the industry or the public. We do see a benefit for the training institutions that will reap the fiscal rewards of individuals paying for pre-trade courses and for apprentices paying for 6 years of study to reach certifying status if they are lucky.

There is also the issue of the training delivery methods and supervisory requirements. Currently Certifiers carry the weight of the industry and that doesn’t look like changing. Supervision has become a major issue and a term and condition of licensing.

It could be argued that the qualification follows in line with the registration of licensing and certifying persons as deemed by the Board. In 2013 the Federation was aware of this and requested a meeting with the Board to push for consultation with the industry regarding registration classifications. Immediate action was denied and a meeting is scheduled for May 2014.

NZQA sets the overarching conditions of the mandatory reviews being the qualifications must be representative of the actual sector requirements and we don’t believe these qualifications achieve that.

We feel committed to change but are not in favour of a rescue package where time and resources are being wasted at the expense of the apprentices training, skill levels and industry needs. Window dressing will not do.

We wish to emphasise the delivery model of the training will dictate the content of the qualification. Apprentices are the people that are the future of our industry – we are responsible for bringing them through their training and turning them into productive practitioners. These are the people who will buy the businesses and train the future generations. We need to get this right – because goodness knows we seen what the outcome of muck ups with apprentice training have done.

The Federation believes there should be three qualifications being Registered Plumber, Registered Gasfitter and Registered Drainlayer. Individuals should either be qualified or not. We don't see the purpose of the licensed class. Electricians get by with only one class, why couldn't we?"

We are being asked to support a qualification that we don't agree with. We were told early on in the process by Skills that they couldn't alter the Registration as that is up to the Board. The Federation asked for a meeting with the Board to instigate that consultation. The proposed qualification simply falls into line with the Board's Registration.

We have no doubt the content of the qualifications combined go a long way to being what is needed to create a suitably qualified tradesperson but seven years to achieve that is a joke. The ITOs have failed us in the past to such an extent that now they only provide assessments and their so called training is directed at getting people to pass those assessments not at becoming the much needed competent trade's people.

These qualifications again are left open to interpretation by the ITO and training provider. We feel there should be more defined stipulation in the qualification in what skills must be taught as "hands on" skills by the training providers.

If the PGDB was to consult on the registration regime and it was changed what would be the use of these qualifications? We would yet again be left with something that is not suitable. As the qualification is dependent on the registration regime then that is where the process should have started.

With regard to the pre-trade/level 3 it may have its uses but only if we are producing numbers of people who are suitable to go into apprenticeships and if the apprenticeships are available. We would suggest people are paying to attend a course with the expectation that they will get an apprenticeship where that is not always the case. The numbers of pre-traders who actually get apprenticeships is very low.

The industry does need good qualifications that are designed for the industry not for the ITO and training providers. You could ask the question of how much money supplied by the Government to train apprentices actually gets to that training. Look at the current licensing statistics for Licensed Plumbers where there are 4348 that are registered and only 470 have licensed so far this year.

That's 89.19% of the people the government have pumped money into for training is not legally applying their skills to that trade. Licensed Gasfitters are similar where there are 2526 registered and only 225 have licensed so far this year, 91.09%. A total of 6179 qualifications not engaged legally in

the industry. Based on the rate of \$40,000 in cash contributions for each trainee that's \$247,160,000.00 pumped into skills that aren't being used and can't be used without supervision.

One issue that was discussed at the meetings regarding the qualification was having opt out points – stages where people can opt out with a qualification or part qualification. These two points are at the end of the pre-trade and at licensing level. We believe this is wasted money as if they opt out after an apprenticeship it has cost the industry and Government \$40,000 in cash input for training them and their qualification means nothing.

The qualification and registration regimes are failing the country.

Barriers are being put in place by the Board for people registering and licensing and the new qualifications being consulted on now by The Skills Organisation will do nothing to assist this problem. The proposed qualification should not proceed and should stop now and the entire qualification system should be consulted on starting with the industry needs and Boards registration requirements.

For your information the Federation has a membership of 1100, ranging from trainees, through to licensed and certifying members, along with interested parties. We have consulted our members and this letter forms their collective views.



Wal Gordon  
Chairman  
Plumbers Gasfitters and Drainlayers Federation