

# Summary of submissions received as result of first round of consultation

## What changes (if any) should be made to the CPD scheme

93 submitters responded to this issue.

**Submissions supporting changes - 74 (80%)**

**Submissions favouring status quo - 19(20%)**

**Federation supports change**

**Master Plumbers supports change**

## 1. Comments in support of change

- It should be dropped.
- I think the CPD scheme has given rise to individuals taking advantage financially of the Boards desire to present our trade as competent to the public. In my view it is a role that the manufactures etc play in keeping the trade up to date with the latest products and their correct installation. Rinnai is a good example of a company promoting its own products and how they should be installed without charge. I believe the CPD scheme should be limited to first aid and work place safety courses as the responsibility of the Board and upskilling are a natural by-product of the industry as it moves forward.
- Needs more advertising as to where courses are available.
- Ensure courses are of sufficient worth. Some I have sat thru are so superficial and light-weight that it makes a joke of the system. Some providers give out answers to all attendees to write down.
- Should be removed.
- We should not have to pay.
- CPD should be dropped if you are qualified.
- CPD seems to be controlled by the manufacturers of products not by the actual plumbers themselves. We need courses that add genuine value. Some courses that plumbers invest a lot of time and money in should be automatically recognised, just because they are not on your list doesn't mean they are not valuable. How can you compare a 3 day course costing a plumber \$1000 to a beer and BBQ course from a valve manufacturer? You can't! Yet your points system would most likely give them the same value, that's if you even recognise it? Additionally anyone that is presenting a course to plumbers, if licenced should also be recognised for CPD.
- I find it the biggest hassle and I think that's why the Board gets all the ..... thrown at it and a lot of plumbers hate the Board. We need to support the Board all of us,

it's a two way partnership. If we could do the CPD online it would certainly make things easy you often cannot get a CPD course you need in your area.

- Encourage more industry partners to develop worthwhile and relevant courses. More on-line options should be developed. Alternatively the Board could develop some form of online brief exam to be undertaken to assess skill/knowledge prior to annual license renewal.
- Broader range of things that CPD points can be accredited for. A higher percentage of CPD points able to be accredited for self-directed learning - up to 50%.
- Allow registered plumbers to become certified at any time after registration.
- Plumbers already pay levies and fees. These courses are compulsory so they should have no additional charges e.g. all CPD courses should be free!
- Do away with the CPD scheme – just a waste of time.
- Less repeating of courses.
- Time lapse before a course can be repeated if completed successfully.
- CPD scheme = compulsory sales pitch. A compulsory one or two day refresher course every two or three years or so, through the polytechs, showing latest methods or products and how to implement them. This won't suit the office plumber, so no chance of that.
- More online courses.
- Get rid of it.
- We need more courses available to the non main centres as it can be hard to get appropriate courses.
- Would be better provided by NZQA backed training organisation to ensure relevance and standardisation.
- More courses in the regions please.
- CPD is a con at the moment. There are very few courses which actually deliver upskilling. I have done a few which have been great from Rinnai and Solahart. By and large the intention is good but the reality is woeful. It is hard to find the time, it is expensive and you don't learn much. I can't really see any benefit to the homeowner for such an imposition on everyone.
- It should cover a two year period. Consideration should be made on the work the certifier undertakes. I have a business and employ 42 staff. I am pricing, designing, and researching new products every day. Why would I need to show if I can crimp two pieces of pipe together to retain my licence. I believe most certifiers work hard at staying up to date with requirements to work in our industry.

- I have previously emailed the former registrar about this. The current way of earning CPD points by just turning up to a new appliance or fitting or fixture information BBQ at the merchants is a nonsense. Sure you can attend these functions but only a minor amount of points should be allocated. Serious upskilling courses where a time commitment of two or three hours are willingly undertaken because of a desire to upskill and stay relevant should be rewarded with more points.

If new classes, like the previously mentioned journeyman class was started then CPD points could be a way of keeping tabs on those persons ability to stay up to date. The CPD points would also be good for the people like electricians and engineers working under exemption to prove they are staying relevant.

- You should be able to nominate unregistered courses on an individual basis. For example, if I go to a lawyers presentation on the changes to consumer lays, I should be able to claim points by submitting the hand-outs or content of the course. Obviously this will need careful administration. The carrying over of more points. Otherwise it is quite a good system.
- Most plumbers and gasfitters only do the CPD to keep their licences. We need to think more about upskilling for knowledge not just complying.
- Should be an exemption for retired plumbers who want to keep registered as a matter of pride.
- It's a joke at the moment. Teaching plumbers how a trap works just to get points its making a mockery of the reason it was introduced. A lot of suppliers of CPD of real training have left the scene after the last change to allow anything to be approved as having some value.
- Not to be made a condition of getting your licence. As many things are already being learnt on the job and life is extremely busy as it is. Perhaps if anything, free instruction should be given on the regulations and the building code so as to keep plumbers up to date with changes rather than just viewing some companies' products.
- More opportunities for commercial combustion and control systems, i.e Riellow, Nuway burners and control Seimens etc.
- Keep it, but make it easier for tradesman to do more courses for free. The PGDB could set up courses for free. I find it difficult to not be able to access the non-free courses to do as they do not interest me as much as the free ones.
- Get rid of the CPD. The courses available are not anything new.
- Do not accept payment for the license unless there are enough CPD for the relevant licence. I recently had a heap of CPD -a lot were gas so didn't work for plumbing. I wasn't aware of that as Bosch hot water course only applied to gas CPD which is odd. Payment was taken but no license arrived, and no notification why until I followed up a month later.

- I don't believe this CPD is needed. Most of the courses I have attended are just product advertising.
- CPD should only related to the work you are authorised to do.
- All courses should free. Approval by the Board on courses is not required and the silly tests at the end are just a joke.
- Points schedule is okay, but it is too easy to get points by doing any CPD course, and many are not relevant to the trade. E.g. I can do a course on hot water cylinders, but as a Drainlayer, is this going to provide me anything but a few 'easy points'. Courses must be relevant to the specific trade cert held by the individual.
- Delete it.
- I've never been a supporter of the current CPD scheme. I realise that there are some cowboys out there, but I don't think that is going to change. Unfortunately tradespeople in general have unfairly been blamed for a large number of failures in the building industry, when the problem lies with the government for introducing flimsy regulations (1991 Building Act), and designers and manufacturers pushing the boundaries way too far.

However, I guess the scheme is here to stay, so anything that eases the burden of plumbers having to chase CPD points will be a bonus. Currently, living in a rural area, I have to travel almost 200 kilometres to attend enough courses to attain the number of points I need to renew my licenses. Perhaps more minimal cost (preferably free) online courses could be provided. Maybe there should be more scope for self-directed learning. The Board could put out relevant information and publications for this purpose.

- The CPD scheme is easily manipulated by too many self-interested parties. Up-Skilling is important; however history tells us that the present scheme has not been effective in communicating important information. For example the changes to gas certification work; tradesmen busily accrued points to register, from manufacturer product displays, while there was no concerted education provided on a major law change. Coordination is required.
- Delete CPD changes to industry written or hands on are relayed to practitioners through PGDB or appropriate legislation.
- What's wrong with it? It's now become a great social event with often beer and nibbles!

If you want people to advance you have to encourage and give merit not threaten and stand over with a big stick. All licensed people should be responsible for their own learning, if every trades person had an online profile on the PGDB site it would be in there best interest to keep that in the green, as this is monitored and then maybe could drop off the public view or be flagged as not completing learning. This could be simply by sending in courses completed, books read, visual learning (in other words everyday stuff) the individual would be responsible for updating their profile. This could also help the consumer to hire a tradesperson if they could get a background of the person/company.

- There should be a mandatory CPD course set up by the PGDB to be attended by all licensed Plumbers, Gasfitters and Drainlayers to review new policies. Q & A's and share ideas. They should also be made to gain a proportion of their CPD points in their normal scope of work and not irrelevant subjects that they do not practice.
- A more robust moderation process of CPD courses to ensure value and consistency.
- There should be specific CPD for overseas learners around legislation, and good practice. It should be targeted, have learning outcomes, and not be onerous.
- The CPD is a disaster and should be scrapped. The PGDB should employ people to gather new information and supply it to all plumbers as part of our fees.
- The person under supervision, like everyone in the industry should be required to do CPD. A certifying plumber is required to set themselves apart for all the other licenses especially in regards to supervision or running a business. However the examination now is not as good as the one I sat originally in 1993. The ridiculous thing is you are now wanting me the self-employed plumber for 22 years to upgrade my skills to meet current trade requirements, now that's a joke. I would suggest 90% of young people passing a certifying exam would not or could not run their own business "without supervision".

Stop devaluing our trade. A failed student out of a school does not mean automatically, "will make a good plumber". The trade and its requirements have moved on, the skill level and needs of today's Craftsman Plumbers (certifying) is higher today than 20 years ago, (I know I have been in the industry for over 30 years). Especially if this industry is to be recognised for what it is – a highly skilled and trained "professional".

- I feel anyone in our industry should be required to be in some form of formal training until at least they have gained initial 'licenced' class of registration. "Exemption under supervision" should be required to pay annual licence fees and participate in CPD otherwise they are getting somewhat of a free ride.
- Having returned to the trades in 2013, I have been dismayed at the poor level of training available to senior tradespeople like me. In fact I am down-right embarrassed with the current offering as a whole. The only courses that I have done to date that I would rate are the Rinnai Tradesmart training for gasfitting, and courses developed by organisations such as Top Drawer and St Johns First Aid. The majority of the courses are simply marketing.

If there is one area that tradespeople will continue to rile against, is the Board's current continuing professional development regime which I can now testify is a failure. There is no way the Board can rely on the current regime to measure competency as in most cases, I have witnessed just showing up will earn points.

It is my view that it is high time that the Board took leadership on this matter and instead of copying what other regulatory bodies are doing it should provide a regime that is measurable, meaningful and purposeful to those it regulates.

## **Suggested replacement**

A risk based regime should be introduced. There should be no points, just competent or not yet competent. The training required should be based on hard evidence gathered by the Board on specific areas where there are demonstrable weaknesses in trade knowledge, or deficiencies in practices. One example would be where new legislation or a major compliance standard was being introduced. Another example may be where evidence from a third party such as the MBIE, statistically highlight health and safety failures in the construction sector or compliance failures that had a bearing on the trades. The Board's own disciplinary processes may find areas where it may consider trades people should improve their knowledge, for instance, it has regularly raised issues with respect to supervision. The new regime would see the Board giving the trades a period of reasonable notice that training and assessment must be undertaken by registered practitioners with a licensing date that competency must be achieved by. The training and assessment would then be facilitated by organisations who met the Board accreditation to provide such services using the Board's current course assessment processes.

I believe if the Board were to adopt this suggested process then it would be able to demonstrate to the trades that the training and assessment is necessary, which would likely be supported by the tradespeople it regulates.

## **2. Comments opposing change**

- I think the CPD system is working fine. There are more suppliers coming on board and most courses are free. There could be some more Practical courses for us hands on plumbers.
- Seems to be working.
- Seems Ok.
- None. It is working fine.
- I personally do not have a problem with the current CPD scheme, it works well.
- We need to stop tinkering with things that aren't broken.
- No changes.
- No, leave it alone.
- It's pretty average as it is, I don't want it changed to take up even more of my time.
- I personally am quite happy with the CPD scheme as it stands.

- I feel that they are working.
- None. Happy with the status-quo.

### **3. Federation view**

“The current Continued Professional Development (CPD) scheme in our opinion has no credibility and does not achieve its perceived purpose.

The section on competence programmes in the PGD Act 2006 section clearly states the purpose of a competence programme is for examining or improving the competence of persons who do or assist in doing sanitary plumbing, gasfitting or drainlaying. It makes no mention of buying points to prove competence on subjects that tradespeople are already qualified in.

This section poses the question that if CPD is a competence programme and a person buys their required points, is deemed competent by the PGD Board and is given authority to do sanitary plumbing, gasfitting and drainlaying then what happens if they are ordered to do a competence programme as a result of action under discipline? What competence programme do they do if they have already been deemed competent by the CPD scheme? This shows CPD is not a competence programme and is unlawful as a term and condition of licensing.

The so called CPD scheme has been implemented by the PGD Board claiming it is a competence programme. The Federation believes what has been implemented by the PGD Board is nothing more than a “mechanism” to implement a Competence Programme.

The term Competence Programme needs defining as it has implications throughout the entire PGD Act from terms and conditions of licensing to discipline order issues.

The Federation agrees there needs to be clarity of the meaning of competency, supervision and upskilling but this needs to be taken into the context of what is good for the tradesperson. No matter how many points a tradesperson buys to have the PGD Board deem them to be competent that person is only as good as their knowledge and skills and their willingness to apply them.

The existing CPD Scheme is a total failure and does nothing to encourage tradespeople to improve their skills, in fact it is quite the opposite - more time is spent avoiding the scheme they do not support, or looking for free courses than actually looking at the competency and knowledge needs.

The PGD Board have been claiming incompetence based on points rather than having monitoring and analysis systems in place to assess what knowledge, skills

and competence are needed. Not every piece of information that is useful is a competence and needs to be in a formal course setting. Some organisations have less relevant training now than ever before because they need to save the time and resources for buying their CPD points for licensing.

The Federation believes a competence programme is designed to protect the public's health and safety and the protection of property by ensuring licensed practitioners are fully competent within the Plumbing, Gasfitting and Drainlaying industries by ensuring the correct information is being supplied and monitored by the governing body.

The PGD Board should be able to accurately assess each individual, class of registration and the industry as a whole. The PGD Board must be able to fully comply with the expectations of the Executive, intent of the PGD Act 2006 and better serve its purpose by protecting the public's health and safety.

The Federation feels competence programs should be split into three key areas of importance:

- Disciplinary Competence Programmes
- General Competence
- Compulsory Competence Programmes

By splitting the competence programmes into the three key areas the system will allow practitioners and the Board to identify an individual's area of deficiency that can be rectified without delay and is not restrictive. The system will also give the Board a transparent path to achieving the outcome of an industry that is up skilling on a frequent basis with relevant and current information.

Individuals know what is best for them and should be left to control their training. The PGD Board's function is to monitor the training and deal with people who fail to achieve expectations of training and up skilling.

More on CPD and Principles guiding prescribing of registration and licensing matters is discussed later in this submission."

#### **4. Master Plumbers view**

"MPGD has already made its view clear on the need for change in the present CPD scheme. We consider the present scheme devalues training and upskilling; it uses a limited training model and is too heavily dependent on a limited number of technical categories. MPGD would like to see a new model of points' allocation, a clearer structure of learning assessment, a faster process for the assessment of content and an increase in the categories of training for CPD.



The points system should be simplified to one point for each hour of training; no one should be able to achieve all their points at one presentation; there should be a distinction between product-based CPD and other types of training or learning.

The proposed review of the CPD system is, in the view of MPGD, a waste of public money and Board time. The present system has little or no industry support; it is derided by tradespeople and struggles to show any real value to the consumer."