



6 Tacoma Drive, Totara Park, Upper Hutt 5018, New Zealand  
Telephone: (04) 5263686 Mobile: 0276564811  
Email : [wal.gordon@xtra.co.nz](mailto:wal.gordon@xtra.co.nz) [information@pgdf.co.nz](mailto:information@pgdf.co.nz)

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Plumbers Gasfitters and Drainlayers Board  
PO Box 10655  
Wellington 6143

### **Classes of Registration Consultation 2018**

The development and future of the plumbing, gasfitting and drainlaying industries is dependent on having classes of registration that are fit for purpose for the industry, and meet the Plumbers Gasfitters and Drainlayers Board's purpose of protecting the health and safety of members of the public by ensuring the competency of all people engaged in the provision of sanitary plumbing, gasfitting and drainlaying services.

A key part of fulfilling the Board's health and safety function lies in administering the licensing system of plumbers, gasfitters and drainlayers.

The Plumbers Gasfitters and Drainlayers Federation believe problems are being created within the industry by the classes of registration currently in place, particularly in the area of supervision. This became quite evident during consultation by The Skills Organisation into NZQA qualifications for the industry and by the numbers of people and organisations appearing before the Board for supervision related offences.

Supervision in the industry is an issue that is getting a great deal of attention, as is the level and standard of training. The Federation believes the current registration classes create problems in the areas of accountability, responsibility and supervision.

When the review of qualifications was under way in 2013 the Federation believed it was a prime opportunity to move the industry into the future and away from the systems that didn't provide what the industry and Board needed. The Federation requested the Board conduct a review however this opportunity was missed by the Board.

In 2015 the Board, in a review of Registration and Licensing, asked one question regarding classes of registration "Should there be one or two classes of registration for qualified tradespeople?"

108 submitters responded to the question where 51% supported one qualification and 49% supported 2 qualifications. The Federation and its membership supported one qualification and Master Plumbers didn't really answer the question and supported a number classes. The Board opted not to change the Registration Classes.

The Skills Organisation has based the NZQA Qualifications on a two tier system - effectively a re-packaging of the failing system. The Federation was opposed to the system and feel it has been a waste of five years whereby the two tier system does not take the industry into the future but follows a path of self interest and financial gain.

The Board has recognised the difficulties and legal standing of supervision. The ratio of supervisors to supervisees in the industry is very low, with supervisors required to supervise tradesmen practitioners, journeymen practitioners, provisional licensees, trainees and exempt people (who are now in the thousands). The burden on supervisors is extremely high as a result of the poor level of skills being produced by the current training scheme. Anecdotally we also believe that many trainees, provisional licensees, journeymen practitioners and tradesman practitioners are in fact barely being supervised, and certainly not at the levels envisaged by the Board, or required under legislation/regulation.

Supervisors are responsible for the majority of the training provided to apprentices as well as the supervision. The Federation believes this training method is a total failure. It does not allow for consistency in training throughout New Zealand in that Certifiers may have different methods, likes and dislikes. There is the added problem of not every plumbing/gasfitting or drainlaying firm doing all work that is required for an apprentice to qualify. There is no quality control on what is taught and the training method is reliant on a theoretical pass.

The Board is in the position of being able to change that situation by changing the Classes of Registration and the requirements. It is The Skills Organisations function to provide what the industry and Board need.

Currently apprentices, employers and the tax payer are paying for the right of an employer to employ and train an apprentice. At the end of the apprenticeship the registered tradesman pays for the right to do plumbing gas fitting and drainlaying but is not allowed to unless supervised. They then have to pay for the right to gain experience in their chosen profession before they are deemed competent to work unsupervised.

The Federation believes the Journeyman Registration caters for practitioners who are unable to qualify or may require additional help to obtain their full qualification.

### **What are the differences in the PGDB Tradesman and Certifiers Competences?**

The first issue to be dealt with is the issue of apprenticeship vs. advanced qualification and how do we differentiate between the two.

In our case the apprenticeship is a National Certificate at Level 4 and the advanced course is a Certificate at Level 5.

| Certificate Level 4   | Certificate Level 5   | Discussion   |
|---|---|--|
| <b>Purpose</b><br>A certificate at level 4 qualifies individuals to work or study in broad or specialised field(s)/areas. | <b>Purpose</b><br>A certificate at level 5 qualifies individuals with theoretical and/or technical knowledge and skills within an aspect(s) of a specific field of work or study. | Level 4 addresses the broad issues where level 5 focuses more on aspect(s) of the field of study. That is part or a portion of the field of study. Level 5 is better suited to specialist subjects such as design, backflow certification etc. |

| Certificate Level 4  | Certificate Level 5  | Discussion   |
|--|--|--|
| <b>Outcomes</b><br>A graduate of a level 4 certificate is able to: <ul style="list-style-type: none"> <li>• demonstrate broad operational and theoretical knowledge in a field of work or study</li> <li>• select and apply solutions to familiar and sometimes unfamiliar problems</li> <li>• select and apply a range of standard and non-standard processes relevant to the field of work or study</li> <li>• apply a range of communication skills relevant to the field of work or study</li> <li>• demonstrate the self-management of learning and performance under broad guidance</li> <li>• demonstrate some responsibility for performance of others.</li> </ul> | <b>Outcomes</b><br>A graduate of a level 5 certificate is able to: <ul style="list-style-type: none"> <li>• demonstrate broad operational or technical and theoretical knowledge within an aspect(s) of a specific field of work or study</li> <li>• select and apply a range of solutions to familiar and sometimes unfamiliar problems</li> <li>• select and apply a range of standard and non-standard processes relevant to the field of work or study</li> <li>• demonstrate complete self-management of learning and performance within defined contexts</li> </ul> <b>demonstrate some responsibility for the management of learning and performance of others.</b> | Demonstrates more technical skill on aspects of the field of study.<br><br>More options<br><br>More targeted self management i.e. specialised.<br><br>Management function. |

It is expected on completing a New Zealand Apprenticeship, apprentices will be 'work competent' for the occupation in which they have been training, and their industries will determine the standard of competency to be met.

Competent is defined as:

*“capable, able, proficient, adept, accomplished, skilful, skilled, gifted, talented, expert, knowledgeable, qualified”*

Some discussion in the industry places level 5 as part of the apprentice pathway where experience is gained however this is not the case and the Federation argues it is an advanced qualification in “aspects” of the industry.

The Federation has no problem with some “aspects” of the industry having “specialist” roles such as design, backflow and fire services, to name a few. The following show the competences for the two registrations and the difference.

| Tradesman (Licensed) Plumber   | Certifying Plumber  | Discussion   |
|--|---|--|
| The applicant must demonstrate knowledge and, have the experience and practical ability to <b>install, test, commission, fault-find and maintain sanitary plumbing systems</b> by means of the following competencies. | The applicant must demonstrate the ability to <b>design, manage</b> the installation of and <b>verify</b> sanitary plumbing systems by means of the following competencies. | Design, manage and verify are all specialist functions and have very little to do with the knowledge and skills required to protect the health and safety of the public. |

| Tradesman (Licensed) Plumber             | Certifying Plumber  |  |
|--|---|--|
| 1. Trade calculations and trade sciences | 1. Trade calculations and trade science used in the <b>design and installation</b> of sanitary plumbing systems | Trade calculations and trade sciences are the same no matter what they are used for. |

| Tradesman (Licensed) Plumber  | Certifying Plumber  |   |
|---|---|---|
| 2. <b>Limitations and applications</b> of materials used in sanitary plumbing, including material protection and jointing methods | 2. Selection of materials; their properties, applications and how they are used <b>in the design and specification</b> of sanitary plumbing systems | Limitations and applications of materials don't change because they are in a design situation or specified. |

| Tradesman (Licensed) Plumber                         | Certifying Plumber                                   |  |
|--|--|--|
| 3. Drawings and specifications for sanitary plumbing | 3. Drawings and specifications for sanitary plumbing |  |

| Tradesman (Licensed) Plumber   | Certifying Plumber   |   |
|--|--|---|
| 4. Installation, testing, commissioning, <b>faultfinding and maintenance</b> of water services for sanitary plumbing | 4. <b>Design, specification and verification</b> of water services for sanitary plumbing systems | To be able to install, test, commission, fault find and maintain you need to know about the design, specification etc. Very much which came first the chicken or the egg, |

| Tradesman (Licensed) Plumber   | Certifying Plumber   |           |
|--|--|-----------|
| 5. Installation, testing, commissioning, <b>faultfinding and maintenance</b> of foul water systems for sanitary plumbing systems | 5. <b>Design and specification</b> of foul water systems for sanitary plumbing | As above. |

| Tradesman (Licensed) Plumber   | Certifying Plumber   |  |
|--|--|--|
| 6. Access to, and application of, relevant documentation relating to sanitary plumbing to meet compliance requirements, and an understanding of the regulatory environment | 6. Access to, and application of, relevant documentation relating to sanitary plumbing to meet compliance requirements, and an understanding of the regulatory environment |  |

| Tradesman (Licensed) Plumber  | Certifying Plumber  |  |
|---|---|--|
| 7. The effect of the installation of sanitary plumbing systems, or its components, on the integrity of structures; including weather tightness considerations as they relate to penetrations to the building envelope | <b>7. Management of the effect on the integrity of structures</b> relating to the design and installation of sanitary plumbing systems; including weather tightness considerations as they relate to penetrations to the building envelope and the coordination with other services | The legislation manages what can and can't be done and this is all at tradesman level. |

| Tradesman (Licensed) Plumber                      | Certifying Plumber  |   |
|---|---|---|
| 8. Responsibilities relating to health and safety | 8. Responsibilities relating to <b>managing</b> health and safety | A management function. Specialist role as not everyone are managers or have ambitions of supervising. |

| Tradesman (Licensed) Plumber   | Certifying Plumber  |          |
|--|---|----------|
| 9. Limitations on persons who do, or assist in doing, sanitary plumbing work | <b>9. Responsibilities relating to the oversight and/or supervision</b> of persons who do, or assist in doing, sanitary plumbing work | As above |

### The Federation Vision is One Registration Class

The vision the Federation is of a registration system and qualifications matrix that sees registered people being able to perform all duties, without supervision. We realise that this would require a longer training period and see apprenticeships lengthened to around 10,000 hours. It would also

require the addition of formalised off site training. This can only strengthen the protection given to the public and raise the standards in the industry.

We feel the industry needs a system that is transparent and understood by industry and can be easily explained to the public.

The Federation believes the current registration classes and the qualifications being developed are focused more on individual and organisational needs and wants, rather than what is best for the future of the apprentices and tradespeople in the industry. As the industry has no governing body it is heavily reliant on the Plumbers Gasfitters and Drainlayers Board to provide leadership within the bounds of the Plumbers Gasfitters and Drainlayers Act 2006.

The Hazel Armstrong Report and the Auditor General's report were both adamant about the division of the Board's role and that of training by the ITO; however there is no debate that it is the Board's responsibility to set the standard required. The Tertiary Education Council (TEC) has stated *"It is expected on completing New Zealand Apprenticeships, apprentices will be 'work competent' for the occupation in which they have been training, and their industries will determine the standard of competency to be met."*

The Federation believes the current system does not meet the requirements of the TEC and the Board has deemed the apprentices are not 'work competent' upon registration hence the requirement for supervision when they are deemed to be a tradesperson not an apprentice.

The current system places barriers and undue costs on practitioners in obtaining full qualifications at Certifiers Registration level. An apprentice can only qualify with a supervision clause on their qualification and must pay for addition training to be able to obtain their full qualification. The Federation believes this is in breach of the intent of the legislation.

The Federation believes:

- The industry wants well trained competent tradespeople.
- Most employers want well trained competent tradespeople who don't need constant supervision.
- Trainees want to be well trained and qualified so they can apply their trade without supervision.
- The Board wants well trained competent trades people to meet their obligations to the public.
- The Government wants well trained competent trades people and an increase in productivity.

The Federation believes problems have been identified and we are strong believers in providing a solution which future proofs all the needs of stakeholders. The following 5 year apprenticeship pathway provides for the needs and also caters for skill shortages in the future.

The pathway allows the apprentice learns basic skills for all three trades over the first two years before going on to their chosen trade. This positions the industry to cater for future needs as practitioners can return the trades they didn't pursue at trade skills level and work towards their qualifications in that trade.

|                                 |   |  |   |  |  |
|---------------------------------|---|--|---|--|--|
| Generic allied trades pre-trade | 5 Year Path/Apprenticeship  |  |   |  |  |
|                                 | Core Skills 1<br>(Exam or assessment to meet the Boards needs)  | Core Skills 2<br>(Exam or assessment to meet the Boards needs) | Trade Skills 1<br>(Exam or assessment to meet the Boards needs)   | Trade skill 2<br>(Exam or assessment to meet the Boards needs) | Qualified/<br>Registration<br>(Exam or assessment to meet the Boards Registration needs)                                     |
|                                 | PGD CS1   | PGD CS2  | Plumber TS1<br>Gasfitter TS1<br>DrainlayerTS1   | Plumber TS2<br>Gasfitter TS2<br>DrainlayerTS2                  | Registered Plumber<br>Registered Gasfitter<br>Registered Drainlayer  |
|                                 | Core skills that are generic to all three trades such as welding, pipe installation, trade science, jointing, hands on skills taught at tech. |  | Trade skills relating to the trade/trades chosen.   |  | Advanced trade skills and responsibilities   |
|                                 | Reasoning: Not all firms do all things. Gives knowledge and skills of all three related trades.   |  | Reasoning: Employer has someone with knowledge of the three related trades but is concentrating on the chosen trade and specialist activities of the employer. Specialist hands on skills |  | Reasoning: Employer now has an individual who has the trade skills and is positioned for passing on the knowledge to others. |
|                                 | Useful to employer as has skills and basic knowledge of all three trades whilst concentrating on the firms needs.                             |  | Trainee Concentrates on employers activities such as plumbing gas fitting or drainlaying and can return to other trades later to get experience.  |  | Trainee is positioned to take on greater responsibility.   |

The Industry and Board have been through a tumultuous two decades and the Federation believes there would be a return to this if change is not made. No one will benefit if sectors of the industry turns their back on the regulation of the industry or its training.

The self interest of some business owners who oppose this idea because they are worried that by having one qualification their employees will all go out and work for themselves in competition with their previous employer is not a valid argument.

It has nothing to do with competency or what is best for industry, and has more to do with a vision of personal/business self protection.

It is time for the Board to show leadership to help the industry progress.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'W. Gordon', with a stylized, cursive script.

Wal Gordon

Chairman

Plumbers Gasfitters and Drainlayers Federation