

**Submission  
No 5**

## **INQUIRY INTO FURTHER INQUIRY INTO THE REGULATION OF BUILDING STANDARDS**

**Organisation:** Design Institute of Australia

**Date Received:** 7 July 2021

---



**Design  
Institute of Australia**

DESIGN INSTITUTE OF AUSTRALIA

**ABN 12 004 412 613**

**GPO Box 355**

**Melbourne, VIC 3001**

---

Submission to the Parliament of NSW Public Accountability Committee on:

**Further inquiry into the regulation of building standards**

July 2021

---

**Scope of this submission:**

This submission outlines the Design Institute of Australia's concerns that the new system of building designer registration in NSW will have unintended detrimental impacts on Interior Designers.

## **The Design Institute of Australia**

The Design Institute of Australia (DIA) is the peak professional association for designers and design businesses in Australia, representing design professionals in all manner of design disciplines for nearly seventy years.

As a professional body, the DIA is run and funded by designers for designers. The DIA champions design and design thinking as a central element in a flourishing digital economy and a sustainable future. The DIA has members from very small to very large practices with a broad range of specialisations. The 2016 Census recorded 3,351 Interior Designers in NSW.

## **The role of Interior Designers**

We recognise that the role of Interior Designers in building design and construction is not always well understood, even among building practitioners.

On building Class 2 to 9 projects across Australia, but particularly in Class 5 offices, designers working in the interior design/architecture category are the lead design consultant on fit out projects of 60,000sqm or more, responsible for coordinating a team of consultants including structural, services, fire and accessibility. As lead design consultant, they will be ultimately responsible for ensuring the building code compliance of what can be substantial interventions into the fabric of a building. This may include changes to fire compartments, movement of doors and windows, insertion of staircases and atriums, compliance with standards and disability codes and changes of use. Interior Designers are also integral parts of documentation teams within both Architectural and Interior Design offices that deal with Class 2 buildings.

Interior Designer is included as an occupation under the Australian & New Zealand Statistical Classification of Occupations (ANZSCO) 23 Design, Engineering, Science and Transport Professionals |232 Architects, Designers, Planners and Surveyors |2325 Interior Designers |232511 Interior Designer.

## **Limitation of the new registration system**

Under the framework in effect from 1 July only registered building design practitioners can lodge compliance documentation. The majority of Interior Designers are unable to meet the requirements for registration. This is not because they don't have appropriate skills and experience but because the registration system specifies qualifications rather than competencies, and the qualifications are drawn from architecture and the building trades. Interior Designers may well have graduated having completed comparable course content to the specified qualifications.

The problems this causes are twofold.

Firstly, Interior Designers with responsibility for Class 2 buildings have a new obligation during the transition period to find a registerable individual to take responsibility for compliance declarations on their behalf. In large studios this may be a relatively minor adjustment to existing practice, but for others it represents an increased cost to be passed on to consumers and a perverse outcome where a less skilled professional than the Interior Designer is making declarations about their work. Once the transition period concludes even this suboptimal approach will not be available.

Secondly, despite being a recognised profession for nearly 70 years there is no regulated system for registration or licencing. Interior Designers do not have an avenue to achieve formal recognition by government in the way that architects, builders and plumbers do.

Although no systemic problem with the work of Interior Designers has been identified in the reviews undertaken at state or national level in recent years, the lack of recognition of Interior Designers in the formal system of accountabilities has a consequence that no standards are specified for their work. Individuals with little formal training and no commitment to professional standards can present themselves for tasks beyond their capability. In particular, they are unlikely to be equipped to comply with the National Construction Code (NCC). This is a point of failure in the current building system that could be addressed by modifying the registration process and referencing Interior Designers in the new legislation or regulations.

Professional Interior Designers working on Class 2 buildings currently take responsibility for the quality of their work, reflected in their professional indemnity insurance (PII). The exclusion of Interior Designers from registration as Design Practitioners will also have implications for their PII. They would happily accept formal accountability in the new framework, including any additional controls or requirements mandated by a government body such as Fair Trading.

### **A suggested remedy**

The Design Institute of Australia (DIA) has a program in place that could be part of the pathway to registration for interior Designers.

The Accredited Designer program is open to practitioners who have the appropriate tertiary qualifications and at least five years' work experience. They are required to accrue 50 CPD points each year and uphold professional standards to maintain their accreditation. NCC-specific activities could easily be offered under the program, and courses on the NCC could be recognised as they are developed by the Australian Building Codes Board.

To build on this and provide the level of accountability required for registration, a suitably qualified council of senior practitioners and educators could be established to confirm registration eligibility, the program could be subject to an independent audit process to guarantee rigour, and restrictions on the ability to practice could be introduced as part of disciplinary action for designers who have been subject to formal processes. In order to align with government reforms the program could accommodate hour requirements rather than points for those wishing to register as Design Practitioners.

### **Conclusion**

Ineligibility to register as Design Practitioners or Principal Design Practitioners will unnecessarily restrict Interior Designers (apart from those who also hold architecture, building or engineering qualifications) from performing work they are skilled, qualified and experienced to do once the transition period concludes. We are already hearing from members that introducing restrictions on the work they can do will change their business model to the extent that it will no longer be viable to continue. Confusion about the new rules is also already leading to client hesitation.

The intention of the building reforms was not to remove highly skilled and experienced practitioners from the industry, but that appears to be an inevitable outcome for many Interior Designers. The new registration framework needs to be urgently reassessed to address the exclusion of Interior Designers.

We would welcome the opportunity to discuss further the issues raised in this submission.

Thank you for the opportunity to comment.

Jo-Ann Kellock FDIA (hon)  
CEO

Gavin Campbell MDIA  
President