



6 April 2023

To the Ministry of Business, Innovation and Employment,

**Re: Occupational regulation reforms in the building and construction sector, Feb 2023**

**About the Schools of Architecture:**

The four New Zealand Schools of Architecture operate in the university and polytechnic sector and deliver professionally accredited architectural education. This education is internationally benchmarked and subject to regular rigorous internal and external review. The full five years (3+2 bachelor and master) of study leads to NZQA Level 9 qualification and is a core element of the Pathway 1 process to becoming a registered architect under the New Zealand Registered Architects Board.

The following is a joint statement from the four New Zealand Schools of Architecture, collectively representing the accredited professional education of architects in New Zealand and seeks to feedback on Key Questions on the review of the Registered Architects Act, A and C, from an education perspective.

**Occupational Regulation:**

Occupational regulation should be underpinned by a consistent approach to practitioner regulation so that equivalent practitioner classes, qualifications, competencies, independent registration processes, ongoing continuing professional development protocols, code of ethics, and scopes of work are readily and easily understood.

The foundational 5-year education of Bachelor plus Master of Architecture that supports qualification pathways towards registration as an Architect in New Zealand is thorough, robust, internationally recognised, and professionally accredited by a panel of national experts every five years. The National Standard of Competency for Architects 2021 V1.0 (NSCA) provides units of competency from project inception through to the completion of construction phase services. The skills and knowledge developed during this education is superior to the requirements Building Designers, such as Licensed Building Practitioner (LBP) Design, where no formal qualification is required.

Architectural education, accreditation, requisite professional experience, and registration examination is rigorously interconnected in New Zealand. Without completing all the registration components, a candidate cannot apply for registration as an Architect or provide architectural services as defined under the Registered Architects Act 2005.

**Question A: Is there a difference in the quality of a registered architect's design work compared to other design professionals?**

The consultation document asks the question, 'is there a difference in the quality of a registered architect's design work compared to other design professionals'? We assert that the answer is yes, due to difference in education, accreditation, registration process, and ongoing assessed professional development that form part of a linked system of continuing education.

**Lack of understanding on the robustness of architecture accreditation procedures and registration and how changes may impact on the profession's reputation nationally and internationally. The consultation document also fails to address their critical importance to ensuring quality building design.**

The consultation document focusses on housing as the area of regulation, and posits that, 'both registered architects and other architectural designers do similar design work' (p36). This is incorrect with the practice of architecture being far broader than standalone houses and requires the ability to navigate complex problems and to provide innovative solutions with a high level of technical resolution that satisfy outcomes beyond the minimum standards of building regulation. This statement fails to recognise the architect's position as lead consultant on large-scale and complex building projects.

Architectural education culminates at level 9 on the NZQA Framework, where graduates develop outcomes demonstrably in advance of undergraduate study, and requires individuals to engage in research and advanced scholarship. These attributes are critical for those moving into professional practice to be critically aware of issues in the field of architecture and to be able to develop and apply new skills and techniques to existing and emerging problems.

The consultation document further fails to demonstrate understanding of the registration process by focussing on competency being, 'only assessed at a general level' and there being, 'no recognition of specialists and specialists' competencies' (p35). The NSCA differentiates between initial and ongoing registration; initial registration as an architect is predicated on broad-based professional practice experience, while post-registration there is the requirement to maintain professional competency and disciplinary knowledge commensurate with an individual's own practice. The terms 'only' and 'general' fail to recognise the requirement to understand the broad range of all requirements of an architect at initial registration and then a further requirement for specialisation as a career of an architect develops and progresses.

**Question C: Is continuing occupational regulation justified for the architectural profession in New Zealand?**

The consultation documents asks if, 'continuing occupational regulation justified for the architectural profession in New Zealand'? We emphasise the comments above related to the high-level of architectural education and the international recognition this brings. Comparatively there is no required qualification for LBP Design and neither would mutual recognition agreements be recognised internationally for LBP Designers. We believe that any move to align architect with architectural designer will conflate the two professions and impair international recognition.

**The lack of consideration on the impact or ramification on architectural education providers, students, and architects.**

The reputation of New Zealand architecture education programmes and architects are well regarded in the international community. Any changes to the accreditation and registration process will directly impact on architecture education providers and the profession. In particular, if the changes do not meet the minimum NSCA thresholds of the New Zealand Registered Architects Board and international expectations, this could potentially translate into a collapse in domestic and international student enrolments, as students seek established accredited degrees from other providers internationally.

In addition, any attempt to align the standards of regulation and accreditation could compromise the mobility of qualified architects nationally and internationally. New Zealand currently has a mutually-recognised consistent accreditation and registration system across Australia, the United Kingdom, the United States of America, Hong Kong, and Singapore. Any change to the current system could undermine the relationship New Zealand has built with international partners and compromise an appropriately qualified New Zealand architect from seeking registration overseas. LBP Design does not share similar mutual relationships.

The schools of architecture contends that any erosion of education, accreditation, and registration processes, or the legally protected 'architect' nomenclature could negatively affect universities, students, and the profession, and have significant economic, social, intellectual, cultural, and political consequences locally, nationally, and internationally.

We believe that the consultation document fails to adequately understand the difference in education at registration and the requirements for ongoing professional development between an architect and an architectural designer. For the public, the continuing occupational regulation of the architecture profession in New Zealand is important to maintain as distinct from other occupation licensing due to these disparities.

Thank you for providing us with the opportunity to respond to the discussion paper. Should you have any enquiries, please do not hesitate to contact us, and we welcome opportunities to be involved with future discussions.

Sincerely,



Peter McPherson

Head of School  
Unitec - Te Pūkenga



Lee Beattie

Head of School  
University of Auckland



Charles Walker

Head of School  
AUT University



Rod Barnett

Head of School  
Victoria University Wellington