



**BUILDING CONSENT AUTHORITY ACCREDITATION
ASSESSMENT REPORT**

Christchurch City Council

Routine Reassessment

10 to 14 August 2015

ASSESSMENT REPORT

Organisation Details

Organisation	Christchurch City Council
Address	53 Hereford Street Christchurch Central Christchurch 8011 New Zealand
Client Number	7486
Accreditation Number	82
Authorised Representative	Robert Wright
Programme	Building Consent Authority Accreditation

Assessment Team

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Report Preparation

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Date finalised:	30 August 2015

Introduction

This report relates to the Routine Reassessment of your Building Consent Authority (BCA) which took place between 10 and 14 August 2015 to determine conformance with the requirements of the Building (Accreditation of Building Consent Authorities) Regulations 2006 (Regulations 4 – 18 inclusive) and applicable technical and procedural criteria.

Accreditation is a conclusion, following assessment by IANZ, that there are reasonable grounds for believing that your organisation complies with the Building (Accreditation of Building Consent Authorities) Regulations 2006 and other normative documents. When any non-compliance is identified, during an assessment, it is IANZ's duty to ensure that compliance is re-established, if accreditation is to continue. How re-establishment of compliance is approached depends on the seriousness of the non-compliance, but also on the level of proven commitment of your organisation to the principles of accreditation and the accreditation process. Whether a minor non-compliance is raised as a Corrective Action Request (CAR) or a Strong Recommendation (SR) will depend on the level of confidence that IANZ has that your organisation will take effective action in a timely manner to address the issues. Organisations that establish a record of timely and effective actions on any non-compliance are likely to receive fewer CARs.

The assessment was a sampling exercise and therefore this report is based on the observations made during the assessment.

Compliance with all legal requirements, including those relating to health and safety, is the responsibility of your organisation. Where some items relating to legal requirements such as health and safety may have been identified, this does not represent an exhaustive report on your compliance with such legal requirements. Auditing for compliance with legal requirements except those explicitly quoted elsewhere in this report is outside the scope of this assessment.

A copy of this report and information regarding progress towards clearance of Corrective Action Requests (CARs) will be provided to the Ministry of Business, Innovation and Employment in accordance with IANZ's contractual obligations.

Executive Summary

This Routine Reassessment of Christchurch City Council BCA identified that compliance with the accreditation regulations continued, for the most part, to be demonstrated.

The assessment outcome is that continued accreditation will be recommended once the single Corrective Action Request, briefly summarised below and detailed in the following pages, has been cleared. It is recommended that all submissions are received by IANZ at least 10 working days prior to the clearance date. In this case the information should be received by 30/10/2015.

- CAR 1 Regulations numbers 7(2)(e), 11(2)(d+e)

Note that when non-conformance with Regulations 7 to 18 is identified, Regulations 5 and/or 6 also apply.

The single CAR relates to a number of aspects of inspection practise and the system for supervision of building control officers during training. As several related issues were identified in this area the BCA is encouraged to review all of the interdependent processes and procedures to ensure that they all work effectively together to provide smooth progress through from recruitment to proven competence and that inspections, in particular, are undertaken consistently in accordance with the principles of the Building Act 2004 and in such a way that they reliably support the issue of a CCC at the end of the process.

The assessment team considered the following positive aspects of the CCC to deserve particular commendation:

- The level of knowledge and customer service focus of the front counter staff dealing with building inquiries. This approach has been shown to improve the quality and completeness of applications lodged with a BCA.
- Allocation of work to competent persons was seen to be operating well. No instances were noted of work allocated to individuals who were not competent to complete it with or without supervision.
- Residential processing records were of a high standard which appeared to be the result of recent effective training.
- Communication between building inspectors and personnel on-site was seen to be clear and appropriate.

Unless the BCA undergoes any critical change in its staff, structure or operations, the next assessment of Christchurch City Council BCA is planned to be a routine reassessment in August 2017.

Observations and recommendations contained within this report provide further detail on the BCAs conformity with general accreditation criteria and industry specifics. Strong recommendations have the potential to become non-conformances and will be followed up at the next assessment.

Conditions of Accreditation

One instance was identified where systems or procedures did not comply with the stated requirements or applicable technical documents and this is detailed in Corrective Action Request (CAR) number 1 .

The corrective action requested must be implemented in accordance with the timescale agreed between the assessor and the authorised representative at the exit meeting and recorded on the CAR before the continuation of accreditation can be recommended. Please complete the appropriate section of the CAR explaining your corrective actions and forward a copy along with any supporting documents and/or records to IANZ for review.

Concerns about the technical findings of the report, or its clearance, that cannot be resolved should be submitted in writing to the Chief Executive Officer of IANZ. The Complaints and Appeals procedure is contained in the IANZ document "Procedures and Conditions of Building Consent Authority Accreditation".

OBSERVATIONS

In this part of the report guidance has been provided regarding the requirements of each regulation or part regulation. This is presented in a text box at the beginning of each section. This information is intended to provide context for the observations that follow.

Regulation 5 Requirements for Policies, Procedures and Systems

5(a) Policies, procedures and systems are required to be documented.

5(b) The BCA is required to have appropriate documentation that includes sufficient detail to ensure that staff using the procedure are clear what to do, when to do it and what records are required to be kept. A BCA is also required to have an appropriate and documented procedure for document control.

Policies and procedures had been documented to address the requirements of the regulations. This documentation was maintained in the Vault, to which all staff had on-line access.

Policies and procedures were generally adequate to meet the requirements of the regulations, however; in many cases the team considered systems could benefit from review and revision with the aim of simplifying and streamlining. Specific areas where this applies are noted later in this report.

Regulation 6 Observance of Policies, Procedures and Systems

6(a) The BCA is required to have a system to ensure that it implements effectively the policies, procedures, and systems required by the regulations.

Internal audits, monitoring, peer reviews etc. were implemented to confirm that policies, procedures and systems were effectively implemented. Each of these activities is noted under relevant sections of the regulations.

6(b)(c) & (d) The BCA must record the decisions it makes under its policies, procedures and systems and the reasons for, and outcomes of, those decisions.

Significant improvement in the quality of records was noted since the last IANZ assessment but the improvements were not universal. Variability of records was noted particularly in commercial processing and this is the subject of recommendation R1. More detail on the quality of records is given under 7(2)(d)(iv).

Regulation 7 Performing Building Control Functions

7(2)(a) This regulation requires the BCA to provide information to applicants wishing to apply for a building consent, on how an application is processed, how work is inspected during construction and how completed building work is certified.

Information was made available to applicants wishing to apply for a building consent on the Council's website. Information regarding how an application is processed, how work is inspected during construction and how completed building work is certified was supplied. The information also included details of the exemption processes operated by the Council. As these exemptions were made outside of the BCA they were outside the scope of accreditation and this assessment.

The general public could also visit the Building and Planning counter at the Council to obtain information regarding these matters. Staff at the front desk had an excellent knowledge of the building and planning requirements of the district and were able to provide general information to anyone making an enquiry.

Regulations 7(2)(b), (c) & (d)(i) refer to requirements for receipt of applications, checking that they have all the necessary content according to the Building Act and relevant Regulations, then lodging them into the organisation's consent management system.

Applications could be received electronically, by mail or over the counter. Applications received over the counter were checked for completeness before accepting, with any shortfalls being identified to the applicant. Initial vetting of applications appeared to be effective in reducing the number of requests for further information needed at later stages and reducing processing time.

There did not appear to be a place on the vetting form to record the decision to accept the application. This decision is important as it is the justification for starting the statutory 20 day clock. It is recommended (R2) that this decision be recorded in line with regulation 6(b).

Regulation 7(2)(d)(ii) requires that the BCA assesses the content of the application in preparation for allocation to a competent processor. This requires a decision about the complexity of the application using the BCA's building categorisation system.

This process was seen to be working well in practise. All projects reviewed had been appropriately classified and allocated to persons with appropriate competencies. In some cases this included reducing the classification of the specific building work if it was low complexity work on a building of a higher category. These decisions were also considered appropriate.

Regulation 7(2)(d)(iii) requires the BCA to have a procedure for the allocation of applications to appropriate building control officers (BCOs) or contractors (consultants) for processing.

Allocation of processing work to persons of appropriate recorded competence appeared to be appropriate.

Regulation 7(2)(d)(iv) requires the BCA to have appropriately documented and implemented procedures for processing of building consents.

Processing procedures were considered acceptable and records indicated they were being implemented as intended. The quality of records for residential processing and records generated by specialists for commercial processing were generally of a high standard. Records of non-specialist work and general oversight of commercial processing would benefit from some improvement regarding level of detail and clarity regarding reasons for decisions. See recommendation R1.

Regulation 7(2)(d)(v) requires the BCA to grant building consents that meet the requirements of the Forms Regulations and are issued in a timeframe compliant with the Building Act. (The statutory clock for processing consent applications is within 20 working days).

Issued building consents were generally considered to meet the requirements of the Building Act 2004. Statutory timeframes for the issue of consents had been substantially complied with since the last IANZ assessment. With the constantly changing volume of work and varying mix of resources the BCA is encouraged to conscientiously record the reasons for each consent that takes longer than the allowable 20 working days as this is vital information to identify any trends suggesting the need for action to remain in compliance.

Regulation (7)(2)(d)(v) also requires the BCA to effectively manage lapsed consents twelve months after they have been issued.

The BCA had identified and managed consents that were due to lapse under Section 52 of the Building Act (the Act) (i.e. no work had started within 12 months of issue of the building consent). Contact was made with building owners at 10 months after issue and then by letter at 11 months, to remind the owner of the pending consent lapse if work was not started. Consents where the owners had indicated they did not want to proceed with the work were also identified as "lapsed" in the system once they reached 12 months.

Regulation 7(2)(e) requires BCAs to plan, manage and perform inspections.

Inspection requests were taken via the call centre. Typical lead times for inspections were seen to be between one and three days. There is no statutory timeframe that inspections must meet and one to three days is widely accepted as reasonable across the country. It is important to monitor this as periods of more than three days between an inspection request and an inspection taking place are considered inappropriate.

Witnessing of inspections provided evidence of some good practises including good communication with clients and good practical inspection skills. However; there were also some causes for concern including more than one instance of inspectors not checking that the plans on-site were up-to-date and therefore not inspecting to the latest revision of plans; inconsistencies between the inspections listed on the consent and actual inspections undertaken and failure to record some of the critical issues discussed with clients. These issues together with an issue related to the management and recording of supervision during inspector training are detailed in Corrective Action Request (CAR) 1.

Regulation 7(2)(f) requires appropriate completion of Form 6 by applicants, compliance with Form 7 & Section 93(2)(b) of the Building Act by the BCA and for the BCA to be compliant with meeting the statutory clock for processing CCC applications.

Applications for CCC were not accepted by the BCA until the final inspection had been passed. Some discussion was held regarding whether it was appropriate to refuse the application if the owner considered the work to be completed but the final inspection was yet to be passed. It was IANZ view that section 93(2)(a) of the Building Act refers to the date on which an application for a code compliance certificate is made, not the date on which an application is accepted. BCA staff were of the opinion that the completion of work was defined as the date when a final inspection has been passed. As this interpretation could not be resolved during the assessment IANZ staff undertook to follow up the appropriateness of this practice with MBIE and to contact the BCA when this interpretation was received. If the MBIE interpretation is at odds with the BCA's interpretation it would be prudent to amend the BCA's practices immediately thereafter to prevent a CAR being raised at the next assessment.

Regulation 7(2)(f) also requires the BCA to manage consents that have not had an application for a CCC at 24 months.

At the time of the assessment the BCA was identifying at 23 months those consents where no application for CCC had been received. Applicants were given the opportunity to apply for an extension of time. If no application for an extension was received the BCA made appropriate decisions whether to issue or refuse a CCC at 24 months. The BCA made some changes during the assessment to the template letters sent at 23 and 24 months to address some concerns raised regarding the wording of the letters. Once these changes were made the letters were found to be appropriate.

Section 93 of the Building Act requires a BCA to make a decision whether or not to issue a Code Compliance Certificate within 20 working days of an application being made or 24 months after a building consent is granted (or any further period agreed between the owner and the BCA). Records reviewed during the assessment indicated that CCC decisions had not been consistently made within these prescribed timeframes. The BCA had recognised this as a problem and had raised a continuous improvement in their system. Recommendation R3 makes clear that if the CI is not successful in achieving consistent substantial compliance with this requirement during the next two years a CAR may be raised at the next assessment.

Regulation 7(2)(f) additionally requires the BCA to issue Compliance Schedules that list specified systems and the inspection, maintenance and reporting requirements of those systems with the relevant CCC.

Completed compliance schedules were generally satisfactory. The procedure for compiling compliance schedules tended to leave collection of detailed information until a late stage of construction. Other BCAs have found it to be beneficial to compile draft compliance schedules as early as possible in the process to prompt the collection of required details. This method, while not a requirement, does seem to reduce problems that can otherwise surface in the final stages of construction.

Regulation 7(2)(f) requires that where a BCA issues a Notice to Fix it is required to comply with the template provided in Form 13 of the Forms Regulations and be issued according to the BCA's documented procedures.

A number of notices to fix were reviewed; the examples seen were generally satisfactory though the BCA should consider carefully which section of the Building Act to cite when raising a notice to fix as an incorrect choice can make the notice ineffective in resolving legitimate issues.

Regulation 7(2)(g) requires a BCA to have a documented and implemented system for management of inquiries other than those addressed by the information detailed under Regulation 7(2)(a).

An appropriate procedure was documented which requires inquiries that relate to a specific consent to be recorded on the consent file. The procedure stated that if an inquiry was not related to a specific building consent issue then no record was made of the inquiry. A recommendation (R4) suggests there may be benefit in changing this policy. Records arising from inquiries that related directly to a specific consent were filed in the relevant consent file.

Regulation 7(2)(h) requires a BCA to have a documented and implemented system for management of complaints.

An acceptable complaints management procedure was documented. Records using this system dated back to December 2013. A review of these records indicated that the system was being operated as intended and that complaints had generally been dealt with appropriately and closed out in a timely manner.

Regulation 8 Ensuring enough Employees and Contractors

Regulation 8 (1) requires the BCA to have a system for ensuring that it has enough employees and contractors to perform its building control functions. Regulation 8 (2) requires the BCA to have implemented a system for assessing the need to employ contractors if it does not have enough available employees assessed as competent to perform the tasks. This process usually includes a review of the range of skills available in-house along with how much work the BCA is processing.

Records showed that successful recruitment and training of building control staff had enabled the BCA to substantially reduce the volume of subcontracted work. The system for assessing the need for contractors appeared to be working effectively.

Regulation 8(2) prompts the BCA to monitor relevant indicators to determine whether the BCA has sufficient staff to complete all of its required functions. Indicators could include completing internal audits according to the annual program, completing competency assessments annually, performing annual training needs assessments, training being delivered as specified, on-going monitoring of the performance of contractors, continuous improvements being progressed in a timely manner, operations meetings occurring regularly and as planned, strategic reviews happening at least annually, maintenance of the quality manual and monitoring of (and meeting) the statutory clocks.

As noted elsewhere, inspections were taking place within acceptable timeframes following requests for inspections. The volume of work being contracted out was decreasing as the in-house capacity of the BCA increased without the statutory timeframes for issuing consents suffering.

Regulation 9 Allocating Work to Competent Employees and Contractors

This Regulation requires the BCA to have a system for ensuring the allocation of processing and inspections to competent persons (employees or contractors).

All the jobs reviewed by the assessment team were considered to have been allocated to persons with appropriately documented competencies.

Regulation 10 Establishing and Assessing Competence of Employees

In regulation 10(1) a BCA is required to have a system for establishing the competence of a person who applies for employment to perform building control functions.

With the large number of new employees during the last twelve months the recruitment process had been thoroughly tested and appeared to have been successful in selecting staff with appropriate qualifications and experience.

In Regulations 10(2) and (3) the BCA is required to have a system for regularly assessing the competence of employees performing building control functions.

This system is to include:

- 10(3)(a) philosophy and principles of building design and construction;
- 10(3)(b) understanding and knowledge of building products and methods;
- 10(3)(c) knowledge and skill in applying the Act, the building code, and any other applicable regulations under the Act;
- 10(3)(d) ability to process applications, inspect and certify work;
- 10(3)(e) ability to communicate with internal and external persons;
- 10(3)(f) ability to comply with the building consent authority's policies, procedures, and systems.

A substantial number of competence assessment records were reviewed. The technical expert involved was satisfied with the coverage of clauses 10(3)(a-f), the quality of records and the decisions arising from assessments. Regular competence assessments were seen to have taken place substantially when scheduled.

Regulation 11 Training Employees

Regulation 11(1) requires the BCA to have a system for training its employees and 11(2) details training system requirements including making needs assessments, preparing training plans, providing training, monitoring effectiveness of training, supervising employees, recording qualifications, etc. and recording professional development

Regulation 11(1) To meet this clause the BCA is required to have a training system for employees who perform building control functions.

The BCA demonstrated a system for managing the training of staff and recording training activities in conformance with the intent of regulation 11. Records were coordinated through a spreadsheet with links to supporting documents in Trim.

Regulation 11(2)(a) requires regular (annual) training needs assessment for performing building control functions for the BCA. These are usually defined as the training needs for the organisation as a whole and for individuals within that organisation.

Training needs were compiled from various sources including annual performance appraisals, peer reviews, internal audits, previous training outcomes, personal requests etc. Records indicated that there could be input to this system at any time but that decisions on training needs were taken at least once a year. This appeared to be a good example of integration of various systems to efficiently meet a regulatory need.

Regulation 11(2)(b) requires the BCA to have Training Plans for all their staff performing technical roles.

Regulation 11(2)(c) ensuring that employees receive the training agreed for them;

As a result of the training needs assessment described above training goals were recorded for each person. In most cases these plans consisted of the titles of specific courses run by the BCA for their staff. These titles in the spreadsheet were linked directly to detailed information on course content and were therefore accepted as sufficiently detailed to constitute an outline of the information or skill to be learned.

The spreadsheet recorded dates when planned training was received. The system included monitoring of individuals who may not have received training planned for them for whatever reason. This allowed rescheduling so that the individual did not lose the opportunity to receive the planned training.

Regulation 11(2)(d) requires the BCA to monitor and review employees' application of the training they have received, including by observing relevant activities;.

Systems were in place to gather feedback on courses attended and to measure the effectiveness of training received. Methods of measuring the effectiveness of training included quizzes and assessment forms as well as on-site observation and peer reviews as appropriate.

Regulation 11(2)(e) requires the BCA to have a procedure in place to supervise an employee whilst under training or at any other time supervision is needed.

Records of supervision of inspectors did not provide confidence that the process was working satisfactorily. No records of direct supervision of inspectors could be found and records of indirect supervision were either completed a long time (up to six months) after the event or were entirely absent. Furthermore, records of indirect supervision of inspectors did not provide any evidence that supervision had resulted in identified needs for further training or decisions that individuals had achieved the required level of competence. This was causing some disillusionment among staff that had remained under supervision for long periods without being informed in what areas they had yet to demonstrate competence. CAR 1 asks that this process be better defined and implemented.

Regulation 11(2)(f) & (g) requests the compilation of records including qualifications and certificates from training received and on-going professional development.

Records of qualifications and training were linked to the training spreadsheet for each individual. The documented system required each individual to maintain records of on-going experience. Two staff members were chosen at random and they were both able to readily access their on-going professional development records. These included relevant experience, reading etc. From the evidence provided this process appeared to be working well.

Regulation 12 Choosing and using Contractors

Regulation 12 (1) requires a BCA to have a system for choosing and using contractors and Regulation 12 (2) defines what that system must cover. This includes establishing contractors' competence, engaging contractors, making agreements with contractors, recording contractors' qualifications, monitoring and reviewing their performance and regularly assessing their competence.

Regulation 12(2)(a) requires a BCA to establish the competence of a person or organisation that they wish to engage as a contractor.

Regulation 12(2)(f) requires a BCA to regularly (at least annually) reassess the competence of its contractors.

Guidance was in place to establish the competence of potential contractors. Form B-619(17) "Contractor Evaluation Form" was used to gather information. The form was completed by the contractor so was a self-declaration. There was a space provided for the contracting organisation to state their practice area and field of expertise. Under the heading of competence the headings are Assessment Type/Qualifications/BCA Accreditation and Current Professional.

The procedure entitled "Choosing Contractors" included a list starting with "Accreditation as a BCA". It is not clear in the procedure if a person assessing a potential contractor's competence would consider the other entries in the list if the potential contractor was a currently accredited BCA. Discussion revealed that there was sufficient ambiguity in the procedure that it may or may not be implemented satisfactorily. At the time of this assessment no new contracts had been signed and therefore there was no objective evidence that the procedure had been inappropriately applied. It is strongly recommended (R5) that this be clarified in the procedure as holding current BCA accreditation alone is not sufficient evidence to conclude that an organisation is competent to perform the work that is the subject of the contract. It was also not clear in the "Choosing contractors" procedure whether or not the procedure should be applied only for new contracts or also at the time of reviewing contracts. Recommendation R6 suggests that this procedure should be applied for contract reviews as well as new contracts.

Regulation 12(2)(b) requires the BCA to have a system for engaging contractors if required.

Regulation 12(2)(c) requires the BCA to have a system for making agreements with contractors if required.

Procedures were in place for engaging contractors and making arrangements with contractors. These had not been used since the last IANZ assessment. A review of the template contract terms considered it insufficiently strong in the area of requiring contractors to ensure that persons with the required level of competence are employed to undertake the contracted work. Recommendation R7 suggests that wording in this respect should be strengthened.

Regulation 12(2)(d) requires the BCA to establish and record contractors' qualifications.

Records of existing contracts assumed the competence of contractors on the basis that they were accredited BCAs or that they employed Chartered Engineers. Discussion above suggested some improvements in contracting arrangements regarding accredited BCAs. As a means of monitoring compliance with these strengthened arrangements it would be reasonable, though not a requirement, to request a current copy of the contracted BCA's skills matrix so that some spot checks could be done to confirm that those who had performed contracted work were considered by the contracting BCA to be competent for the specific contracted work.

Similarly with Chartered Engineers, Chartered status is a reliable indication that an engineer is competent in some field or fields of engineering. However; being chartered does not indicate that an Engineer is competent in all engineering fields. Recommendation R8 suggests that a more appropriate means of establishing reasonable grounds to believe that an engineer is competent to perform specific tasks is implemented.

Regulation 12(2)(e) requires the BCA to monitor and review contractor performance.

Records of monitoring of contractors' performance were seen but these had not changed since the last assessment.

Regulation 17(4)(b) requires contractor compliance with QA Systems (either the BCAs or their own).

A system was in place to require contractors to work in accordance with the CCC BCA quality management system or their own quality system. This is reasonable when the contractor is an accredited body. The system for new contractors did not include any stipulation of what would constitute an acceptable quality management system for the specific contract. Discussion during the assessment concluded that it would be reasonable for the BCA to use the headings of regulation 17 as a menu from which specific items could be chosen as essential requirements for specific contracts. The BCA should also specify what evidence they will accept that the quality system elements required in the contract are effectively implemented.

Regulation 13 Ensuring Technical Leadership

Regulation 13(a) relates to identifying employees or contractors, who are competent to provide Technical Leadership and 13(b) relates to giving those technical leaders powers and authorities to enable them to provide leadership.

The BCA had identified a number of Technical Leaders among their personnel for various types of building work. Decisions to appoint Technical Leaders were supported by appropriate evidence of competence in each person's competence assessment record.

Regulation 14 Ensuring Necessary Resources

Appropriate technical information is required to be made available to those staff needing to make use of it.

BCA staff had access to required standards through the Standards New Zealand website. Other information was available through the internet, with many archived copies of standards and reference material being available in hard copy in its technical library, although some reference material had been lost in the aftermath of the earthquake. All required standards were found to be available.

Appropriate technical facilities are required to be made available to BCA staff.

Technical facilities, including phones, Go-Get tablets etc. appeared to be appropriate and available where required.

Appropriate, calibrated equipment is required to be made available to staff.

The BCA had documented its procedures for calibration of measurement devices. Calibration records were maintained in a spreadsheet. Records were reviewed for a selected number of devices. All of these were found to have an appropriate calibration, consistent with the requirements in the BCA's procedures. It was suggested, during the assessment, that checking moisture meters against reference blocks could be substituted for regular external calibrations, provided a suitable procedure was implemented that defined the allowable error in readings before an external calibration was required and records of checks (including actual readings) were maintained to justify this decision.

Regulation 15 Keeping Organisational Records

A BCA is required by Regulation 15(1) to record its organisational structure and record in the structure reporting lines & accountabilities and relationships with external organisations.

The BCA had documented organisational charts that recorded reporting lines and accountabilities within the council. It had also documented its relationships with external organisations in a chart. The BCA was considering using its HR organisational charts to fulfil the requirements of this clause of the regulations. These were therefore also reviewed and found to also meet the requirements of the regulations.

Regulation 15(2) requires that roles, responsibilities, powers, authorities & limitations are recorded. Job descriptions are required for all staff in the BCA (or alternate means to document roles and responsibilities).

Roles and responsibilities were documented in job descriptions. The Councils delegations manual, along with the delegations from the BCA's Director to BCA staff were reviewed. These recorded delegations for building control functions to appropriate staff.

Regulation 16 Filing Applications for Building Consent

Regulation 16(1) requires unique identification of Application files.

Each application for building consents was allocated a unique identification. Amendments to a building consent were given the relevant building consent number, with an attached alphabetic suffix.

The purpose of Regulation 16(2)(a) is to provide a means for the BCA to verify an application files' completeness prior to handing it over to the Territorial Authority for storage.

A number of consent files were reviewed and generally the "story" could be followed from application through to the issue of a CCC, where available. With the on-going transition to fully electronic records regular, targeted internal audits of files to assess the completeness of records would probably be useful.

Regulation 16(2)(b) requires that the files are accessible and retrievable and 16(2)(c) requires that they are stored securely.

When files were selected by team members from computer generated lists the files and records could be located efficiently.

Regulation 17 Quality System

Regulation 17(1) requires a BCA to have an integrated Quality System and 17(2) defines requirements for that system.

Regulation 17(2)(a) requires that the system for assuring quality covers the policies, procedures and systems described in regulations 5 to 16 (arguably this should read 5 to 18 for clarity)

The quality management system was effectively integrated in the Vault. A few examples were seen of processes that were outside the Vault; the issue of supervision of inspectors during training being a case in point. In principle, if someone identifies a need for a new or improved process this should be managed and, if approved, incorporated into the Vault.

Regulation 17(2)(b) states that a Quality Policy is required.

The DBH Regulation 17 guidance document requires that the quality policy includes high level measurable objectives. The intent of these objectives is to provide a framework for establishing the effectiveness of the quality assurance system.

An acceptable quality policy was documented. According to the MBIE guidance on clause 17(2)(b) the intent of a quality policy is to provide a brief statement demonstrating senior management's commitment to the quality management system. The quality policy should include commitments to meet the requirements of the Building Act, Accreditation Regulations etc. A quality policy should include high level measurable objectives so that objective evidence can be collected and analysed by BCA management to demonstrate the effectiveness of the documented policy. The quality policy should be regularly reviewed to ensure that it remains appropriate and relevant for the organisation. The quality policy as seen during the assessment was acceptable but could be improved by taking into account the MBIE guidance. The council's "Plan on a Page" system documented high level measurable objectives. If these are intended to be part of the quality policy this should be clearly described in the policy statement.

Regulation 17(2)(d) requires BCAs to undertake regular operational reviews (meetings) to communicate progress against objectives.

Review meetings were organised every two weeks to consider operational performance issues. Minutes of these meetings were filed.

Regulation 17(2)(e) requires a documented system for management of continuous improvement of the performance of the BCA's functions.

A system for managing continuous improvements was documented. Records showed that this was widely used and generally effective. In most cases appropriate actions had been taken in a timely manner. However; there were some records that had not been closed out more than twelve months after they were raised. Recommendation R9 suggests improving the system to provide records of the reasons for delays and positive management of the issues. A column headed "status" provided an opportunity to record important milestones throughout the process but did not impose any target dates for closure.

Regulation 17(2)(h) requires a procedure for ensuring that internal audit of every building control and related function is undertaken at least annually.

An audit schedule covering all parts of the BCA's systems and the regulations was sighted. This schedule had been partly met by the use of a contracted auditor from another BCA. Records of audits were reviewed, these consisted of pro-forma questionnaires with closed questions allowing only yes or no as answers. Questions were numerous and reasonably detailed; however this methodology tends to restrict the freedom of the auditor to ask broader questions and to follow an audit trail based on responses to previous questions. In conclusion the BCA was performing the auditing process as documented. Greater value could be gained from an audit process that also encouraged a less regimented approach.

Regulation 17(2)(i) required a documented and implemented procedure for the identification and management of Conflicts of Interest.

A process was documented that encouraged staff members to identify and record actual and potential conflicts of interest. Records showed that this system had been used by several members of staff. In all the cases reviewed there had been an actual conflict such as an inspector being involved in building work at their family home. None of the records reviewed involved potential or perceived conflicts of interest. Staff should be reminded that it is in their interest and that of the BCA that they are constantly aware of situations that could be perceived to be conflicts of interest, even though there is no conflict in fact. Recording such situations, as they arise, provides a level of confidence in the integrity of the BCA if any instances of real or perceived conflict of interest need to be investigated.

Regulation 17(2)(j) requires a procedure for communication with internal and external persons. This must document what, how, how frequently communications take place and who is responsible.

The Vault contained a list of methods of communications with persons with the BCA, within the wider Council and with interested parties outside of the Council. The assessment team confirmed that communications within the BCA and the TA took place. The existence of open communication via the website was also confirmed.

Regulation 17(2)(n) requires an annual strategic review meeting to be carried out according to the BCAs documented agenda.

Records showed that the last strategic management review had taken place in July 2015. A reasonable level of analysis of data was seen which categorised issues.

Regulation 17(3) requires a Quality Assurance manager to be named.
Robert Wright was named as Quality Manager.

Regulation 17(3)(A) requires a documented system for management of complaints about professionals.

An appropriate procedure was documented but records of its use were not seen.

Regulation 18 Requiring technical qualifications

Regulation 18(2) requires the BCA to have a system to ensure that every employee or contractor that performs building control functions by doing a technical job has appropriate technical qualifications

The BCA had defined what qualifications it considered to be appropriate for the work its staff undertook and had recorded the qualifications of its employees performing building control functions on a spreadsheet. The assessment team considered these qualifications to be appropriate.

Regulation 18(3)(a) requires the BCA to have a system for establishing the circumstances that would make it unreasonable for employees or contractors to hold the defined qualifications and Regulation 18(3)(b) requires those staff to be identified and recorded.

The BCA had defined the circumstances under which staff could be exempt from holding one of the defined qualifications. These appeared to be appropriate.

All staff members were either working towards or held a suitable qualification, except those that were exempt as per its procedures.

CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006 Clause No: 7(2)(e) and 11(2)(d+e)

CAR No: 1

Regulations 7(2)(e), 11(2)(d) and 11(2)(e) and the overarching 6(b, c and d) refer to inspection, supervision during training and the recording of decisions.

The following issues were identified that relate to these regulations all centred on the management and practise of inspections.

- Inspectors were not, as a matter of course, checking that the latest revisions of plans were on site
- Inspectors were inspecting to the building code rather than to the approved plans
- Records of indirect supervision were not being kept in accordance with documented procedures
- Records of indirect supervision were compiled long after the event or not at all
- Records of indirect supervision gave no indication of outcomes i.e. if further training was needed or competence had been achieved
- No meaningful records of direct supervision of inspection could be found
- Records of inspections did not capture all critical issues discussed with site personnel

To remedy this situation:

- 1) Please review and where necessary revise procedures that define inspection practises, recording of inspection outcomes and management of inspection supervision. Please provide a copy of these procedures to IANZ for review
- 2) Please provide training in the new procedures to all inspectors and those responsible for management of supervision of inspectors during training. Please provide records of this training to IANZ
- 3) Please implement the new procedures and provide a written commitment to a programme of targeted audits to investigate:
 - (i) if the new procedures are delivering satisfactory inspections
 - (ii) if records of inspections are capturing all critical decisions and communications
 - (iii) if records of direct and indirect supervision are being completed in a timely manner
 - (iv) if supervision is demonstrably resulting in decisions on the need for specified further training or achievement of competence

IANZ will review records of this process during the next scheduled reassessment.

Agreed clearance date: **30 October 2015**

For Building Consent Authority use:

Action taken: (please refer to any attachments)

Signed:

Date:

Attachments: Yes / No

Clearance by IANZ:

Signature:

Date:

RECOMMENDATIONS

Recommendations are intended to assist your organisation in its efforts to maintain an effective quality management system. They are **not** conditions of accreditation.

R1. Records of commercial processing were not consistently of acceptable quality. It is **strongly recommended** that the BCA focus attention on the quality and consistency of commercial processing records with the aim of ensuring that all commercial processing records are brought up to the high level of some existing commercial processing records. Targeted internal audits of this particular aspect would be a possible means of addressing this issue.

R2. There did not appear to be a place on the vetting form to record the decision to accept the application. This decision is important as it is the justification for starting the statutory 20 day clock. It is recommended that this decision be recorded in line with regulation 6(b).

R3. Compliance with the statutory timeframes for the issue of CCCs had not been consistently, substantially achieved over several months. It is **strongly recommended** that the procedure for preparing and issuing CCCs be reviewed with a view to simplifying the process and improving efficiency. Experience in other BCAs has shown that much of the preparation for issuing a CCC is best incorporated into scheduled inspections. A checklist that identifies and checks off items such as producer statements, energy works certificates, passed inspections as per the consent etc. during construction removes most of the problems encountered otherwise at the end of the process.

Note:

This issue is strictly a non-compliance with the regulations and could have been raised as a Corrective Action Request (CAR). However, taking into account the fact that the issue has been logged in the continuous improvement system and the organisation's positive approach to continuous improvement, IANZ trusts that positive and timely action will be taken to address this on the basis of a Strong Recommendation and that the situation will be monitored to prevent recurrence.

R4. Procedures dictated that inquiries related to building control issues, but not to a specific granted consent, were not recorded. It is recommended that these inquiries should be recorded so that common subjects of inquiries can be identified and, if considered useful, guidance material could be developed to provide commonly requested information.

R5. As discussion during the assessment revealed different understandings of the Choosing Contractors procedure, some of which would be satisfactory and some would not, it is **strongly recommended** that some words be added to this procedure to make clear how this should be interpreted. As examples it should be clear that accreditation as a BCA does not mean that other criteria do not apply when assessing the competence of a potential contractor. Similarly where the procedure refers to "certification to an appropriate standard" it is not clear whether this relates to individuals, the management system or something else and what would be **appropriate** standards in each case.

R6. At the time of the assessment the Choosing Contractors" procedure had not been applied as no new contracts had been signed since the procedure was approved. It is **strongly recommended** that there be clarification in the procedure that it applies to review of contracts as well as new contracts as regulation 12(2)(f) requires regular review of contractors' competence. It was noted that several existing contracts were due for review/renewal immediately following the assessment. It is therefore **strongly recommended** that action be taken on this recommendation as a matter of urgency to avoid a corrective action in future.

R7. Existing contracts with organisations do not explicitly require the contractor to allocate work to persons with appropriate competencies for the job. The general clause (9.1(c)) of the contract template, stating that the contractor agrees to use the highest reasonable standard of skill, care and quality leaves this open to interpretation. It is recommended that suitable words be added to contracts to explicitly require allocation of the contracted work to persons with the required competencies.

R8. The assessment team considers that the current practise of accepting CPEng status alone as reasonable grounds to believe that an engineer is competent for any engineering task is inadequate. It is recommended that the BCA considers following the guidance given in IPENZ Practice Note 1 and the IPENZ publication “Engineering Edge” when contracting work to engineers.

R9 To ensure that continuous improvements are closed in a timely manner it is recommended that the current system is revised to ensure that when the initial target date for closure of a continuous improvement item is exceeded the issue is reviewed, the reason for the over-run is recorded and a new, realistic, target date is set.