

SUBMISSION BY THE



to the

**Construction and Property Services Industry
Skills Council**

regarding

Feedback on Proposed structure of:

- **Certificate III**
- **Certificate IV**

Qualifications in Swimming Pool & Spa Service

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ABOUT SPASA

The Swimming Pool & Spa Association of NSW (SPASA NSW) is the peak body within NSW and the ACT's pool and spa industry, representing hundreds of Australian businesses. Members of SPASA NSW include leading pool builders, manufacturers, suppliers, retailers, technical servicemen, subcontractors, installers, consultants and other allied trades, all of whom set themselves apart from the rest of the industry by setting standards of skill, workmanship and ethical business behaviour in the best interests of pool and spa owners.

SPASA NSW is also a Registered Training Organisation (RTO) that provides training and assessment to the swimming pool and spa industry. Our courses have been designed in consultation with key industry stakeholders and our qualifications and accreditations are highly valued by government, employers and the wider community.

SPASA NSW currently has the following courses registered on its scope:

- **Certificate III** in Swimming Pool Repairs, Servicing and Interior Finishes
- **Certificate III** in Swimming Pool Building and Installation
- **Certificate IV** in Swimming Pool and Spa Building
- Work Safely In the Construction Industry (Construction Induction)

In addition, SPASA NSW runs other industry specific courses not limited to the following:

- Inspect Swimming Pool and Spa Safety Barriers
- Continual Professional Development
- Tailor Made Courses

As an operating Registered Training Organisation (RTO) for the swimming pool and spa industry, SPASA NSW is well positioned to comment on the draft National Competency Qualifications for Swimming Pool and Spa Technicians.

COMMENTS

SPASA NSW supports the introduction of National Qualifications for Swimming Pool and Spa Service courses which will eventually become available under a new National Training Package.

SPASA NSW believes that the benefits of a Swimming Pool and Spa Service National Training Package should include:

- Training that meets the needs and requirements of the swimming pool industry and the standards set by that industry
- Consistent and appropriate nationally recognised Qualifications
- Flexibility to choose how, when and where the training is undertaken
- Confidence by business and individuals of the quality of training and level of qualifications

LEVEL OF COMPETENCE

SPASA NSW holds concerns primarily relating to the proposed Certificate III and Certificate IV level of qualification as opposed to the Units of Competency.

The Association believes that these levels are not appropriate. The learning outcomes of the units of competency align closer to Certificate II and III levels.

CERTIFICATE III

Certificate III is traditionally seen as a trade's level qualification, whilst Certificate IV is post trades and business level.

The proposed Certificate III units of competency are too basic to be at that level.

The following units are examples of this:

- Perform basic swimming pool measurements and calculations
- Carry out routine maintenance of swimming pools and spas
- Carry out routine maintenance of swimming pool and spa water circulation and filtration systems
- Carry out routine maintenance of swimming pool and spa water chlorination systems
- Carry out routine maintenance of swimming pool and spa water cleaning and vacuuming systems
- Monitor pool water quality

Certificate II level is certainly more appropriate.

CERTIFICATE IV

The proposed Certificate IV units of competency are too basic to be at that level.

The following units are examples of this:

- Monitor pool water quality
- Maintain pool water quality
- Assess and treat water problems in swimming pools and spas
- Inspect, service and repair swimming pool and spa circulation and filtration systems
- Inspect, service and repair swimming pool and spa chlorination systems
- Inspect, service and repair swimming pool and spa cleaning and vacuuming systems
- Read and extract information from plans, drawings and specifications for swimming pools and spas
- Detect leaks in swimming pools and spas
- Work safely at heights
- Enter and work in confined spaces

Certificate III level is certainly more appropriate. It should also be noted that similar units are generally available at a Certificate III level in other training packages.

DUPLICATION OF UNITS

Some units of competency are duplicated between Certificate III and IV.

The following units are examples of this:

- Monitor pool water quality
- Maintain pool water quality

The duplication effectively reduces the number of required units of competency in Certificate IV from 20 to 18. It also means that having done Certificate III, these units allow automatic Recognition of Prior Learning (RPL) of one tenth of the competencies required for Certificate IV.

COMBINING UNITS

SPASA NSW believes that too many similar skills have been split into separate units of competency.

The following units are examples of this:

- Carry out routine maintenance of swimming pools and spas
- Carry out routine maintenance of swimming pool and spa water circulation and filtration systems
- Carry out routine maintenance of swimming pool and spa water chlorination systems
- Carry out routine maintenance of swimming pool and spa water cleaning and vacuuming systems

Moreover, a single unit “*Carry Out Routine Maintenance of Swimming Pools and Spas*” would adequately cover the above separate units.

The basics of pool and spa water quality are the same. *Monitor/Assess* and *Maintain/Treat* are very similar in their meaning and function. There should be a combining of the below units within the Certificate IV rather than the development of entirely new units (as noted *).

- Monitor pool water quality
- Maintain pool water quality
- * Maintain spa water quality
- * Assess and treat water problems in swimming pools and spas

The splitting of similar competencies appears to be an attempt to create units to satisfy a requirement that a certificate is made up of a certain number of units.

ADDITIONAL UNITS

The incorporation of “Inspect Swimming Pool and Spa Barriers” Course is proposed as an additional elective unit. Both Western Australia and Queensland currently have a requirement that barriers (fences) around swimming pools and spas are inspected at regular intervals. Similar requirements are likely to be introduced in New South Wales by the end of the year with the ACT and other states to follow.

It is logical to formalise learning outcomes across the states by including this competency into the certificate course.

SUMMARY

SPASA NSW's commitment to training is a fundamental part of our culture.

The Association has been a pioneer in education and training for the swimming pool & spa industry since 1997. In fact, we have educated over 5,000 learners since our inception of which 2,200 learners have been awarded formal qualifications.

SPASA NSW applauds CPSISC for their commitment to work with the swimming pool and spa industry with the number one objective to introduce national qualifications; however, we remain concerned that the timeline may have compromised the process and produced feedback in haste.

As a general observation, it would appear that the proposed qualifications have been rushed and superficially increased rather than seeking additional stakeholder consultation to discuss, create and better align units of competencies.

Whilst SPASA NSW recognises that a Certificate IV may have some merit, the proposed competencies essentially "dumb up" both qualifications, being nowhere near the complexity of similar certificate levels in retail, building, manufacturing and other industries.

It would be remiss not to mention that both the National Swimming Pool Institute in Queensland and SPASA NSW already deliver Certificate III Courses for the Swimming Pool Service Sector and are endorsed by the regulatory authorities in their respective states as the licensing pathway. Incidentally, both Certificate III courses are more comprehensive than the proposed Certificate IV qualification.

The Association's view is that the proposed learning outcomes of the units of competency are not appropriate and align closer to Certificate II and III levels than III and IV.

SPASA NSW believes that a more sensible outcome would be to combine similar units, remove duplication and deliver a more relevant Certificate III level qualification while continuing to consult the industry for the creation of a more defined and focused Certificate IV.

Yours Sincerely



Spiros Dassakis
Chief Executive Officer