



**BUILDING CONSENT AUTHORITY ACCREDITATION  
ASSESSMENT REPORT**

Queenstown Lakes District Council

Routine Reassessment

30 March to 1 April 2016

Amended report  
27 April 2016

# ASSESSMENT REPORT

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## Organisation Details

|                           |   |
|---------------------------|---|
| Organisation              | Queenstown Lakes District Council               |
| Address                   | 10 Gorge Road<br>Queenstown 9300<br>New Zealand |
| Client Number             | 7491  |
| Accreditation Number      | 73  |
| Authorised Representative | Stewart Geddes                                  |
| Programme                 | Building Consent Authority Accreditation        |

## Assessment Team

|                   |                            |
|-------------------|----------------------------|
| Lead Assessor     | Adrienne Woollard          |
| Technical Experts | John Tait<br>Jeff Samasoni |

## Report Preparation

|                 |                   |
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| Prepared by:    | Adrienne Woollard |
| Checked by:     | Carolyn Osborne   |
| Date finalised: | 15 April 2016     |

## Introduction

This report relates to the Routine Reassessment of your Building Consent Authority (BCA) which took place between 30 March and 1 April 2016 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 by IANZ that your organisation complies with the Building (Accreditation of Building Consent Authorities) Regulations 2006 and other normative documents as relevant. 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 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 Queenstown Lakes District Council BCA (QLDC) identified that full compliance with the accreditation regulations was not demonstrated. Continued accreditation will only be considered once the BCA has provided a plan acceptable to IANZ that details how the organisation will address the eleven Corrective Action Requests (CARs), briefly summarised below and detailed in the following pages. Continued accreditation is also conditional on the successful completion of another routine reassessment of the BCA in October 2016.

- CAR 1 Regulation 5 - Requirements for policies, procedures, and systems  
Regulation 6 - Building consent authority's observance of policies, procedures, and systems
- CAR 2 Regulation 6 (a) - Building consent authority's observance of policies, procedures, and systems  
Regulation 17 (2) (h) - Assuring Quality - Internal Audits
- CAR 3 Regulation 6 (b), (c) (d) - Building consent authority's observance of policies, procedures, and systems  
Regulation 7 (2) - Performing building control functions
- CAR 4 Regulation 8 - Ensuring enough employees and contractors  
Regulation 7 (2) (d) - Performing building control functions  
Regulations 9 to 13, 15 and 17 – Allocation of work, competence assessment, training, contractors, technical leadership, organisational records, quality system.
- CAR 5 Regulation 7 (2) (f) - Performing building control functions
- CAR 6 Regulation 9 - Allocating work to competent employees or contractors  
Regulation 10 - Establishing and assessing competence of employees
- CAR 7 Regulation 11 - Training employees
- CAR 8 Regulation 12 - Choosing and using contractors
- CAR 9 Regulation 13 - Ensuring technical leadership
- CAR 10 Regulation: 17 (2) (n) - Assuring Quality - Management review (long term)  
Regulation: 17 (5) - Assuring Quality - Management Review

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

In general the BCA were aware of the issues identified above but had been unable to recruit sufficient staff to address the issues in a timely manner. The nature and severity of the CARs identified could have resulted in possible revocation of the BCAs accreditation. This is not being recommended at this stage as, at the time of the assessment, the BCA was generally aware of and already working towards addressing the issues.

The BCA had appointed a contractor to assist with improving its quality system. This, and assurances from the Chief Executive, had also gone some way towards providing comfort to IANZ that the issues would be dealt with quickly and appropriately.

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**

Some instances were identified where the systems or procedures did not comply with the stated requirements or applicable technical documents and these are detailed in Corrective Action Request (CAR) numbered 1 to 10.

Any corrective actions requested must be implemented in accordance with the timescale agreed between the assessor and the authorised representative at the exit meeting and recorded on each CAR before the continuation of accreditation can be recommended. Please complete the appropriate section of each CAR explaining your corrective actions and forward a copy along with any supporting documents to IANZ for review. Any CAR marked with an asterisk (\*) is similar to one raised previously and must be addressed immediately.

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.

The BCA maintained an electronic manual that documented the BCAs policies, procedures and systems.

Some examples were observed where the procedures were not ensuring an appropriate outcome. These included issue of Form 5 (Building Consents) which did not include required detail regarding Compliance Schedules and Specified Systems, receipt of Form 6 (where the applicant was not providing the date work completed or details regarding Specified Systems) and Notices to Fix (where the BCA was not ensuring appropriate delegation for their issue). Procedures for receiving appeared to be insufficient as poor quality applications were observed to be accepted, with little guidance regarding quality provided to applicants and no minimum for acceptance set by the BCA. **See CAR 1.**

While the majority of documented procedures were appropriate for their purpose, numerous cases were observed during this assessment where the BCA was not following the procedures. **See CAR 1.**

Document control appeared to be appropriate.

### 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.

QLDC BCA had elected to demonstrate its effective implementation of its systems, policies and procedures using internal audits. While some internal audits had been carried out in 2015 some regulations had not been audited during the last 12 months. **See CAR 2.**

Completed audits identified many of the shortcomings in implementation of the BCAs policies, procedures, and systems also identified by the assessment team. Further discussion regarding auditing is provided under Regulation 17(2)(h).

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.

Recording of the decisions, reasons for decisions and outcome of processing decisions was found to be inconsistent. In some cases good reasons for decisions were recorded however in other examples little or no reasons were recorded. **See CAR 3.**

Received Producer Statements were of an inconsistent quality yet all appeared to have been accepted without appropriate reasons for those decisions being recorded. **See CAR 3.**

There was generally minimal recording of inspection decisions. **See CAR 3.**

Code Compliance Certificates (CCCs) were observed to have been issued when there was incomplete records of the reasons for the decision to do so. **See CAR 3.**

Recording of reasons for competency decisions were found to be of a good standard.

## 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.

The BCA's public information was found on the QLDC's website. A lack of some information was noted. A copy of the IANZ guidance sheet was provided to the BCA during the assessment that detailed the information that IANZ recommends to be provided by the BCA. Strong recommendation **R1** requests that the BCA updates its public information to ensure that applicants have a clear understanding of the minimum requirements for building consent applications and a clear understanding of the process.

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.

The BCA had documented a procedure for managing and recording receipt of applications and for checking of their completeness. Applications were generally received electronically through the portal although they could also be received by post or over the counter.

The procedure for receiving appeared to be insufficiently detailed to ensure that all applications were appropriate and complete before acceptance. A review of consent files revealed that while Form 2 was on most occasions completed appropriately, some incomplete, incorrect or poor quality applications were observed to be accepted. These included applications where insufficient detail regarding the description of work, means of compliance or specified systems had been provided.

Other applications were observed to be made using copies of old plans where it was unclear what was new work and what work was part of a previous application. Further examples were observed of poor quality, hand drawn plans or plans without appropriate measurements provided. Little guidance regarding the required minimum quality of applications was provided to applicants. No minimum for acceptance had been set by the BCA making it difficult for staff to decide whether the application could be refused.

The BCA is requested to ensure that its procedures ensure that all applications are clear and complete before acceptance. **See CAR 1.**

The organisation's process for lodging applications into their computer system was seen to be effectively implemented.

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.

Application content was assessed using the building categories defined in the National Competency Framework. All work reviewed had been appropriately categorised.

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.

Work was allocated to processing officers (in-house staff or contractors) according to their assessed competence (recorded on the skills matrix) and current workload. Processing work was observed to have been appropriately allocated.

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

The BCA had documented procedures for processing of building consent applications however, records of processing of most applications did not meet an acceptable standard with a number of applications not having any record of reasons for processing decisions. **See CAR 3.**

The processing checksheets referred to long out of date Building Code requirements and the processing checklist sections regarding Waivers and Alternatives Solutions also required updating. **See CAR 1.**

Consideration of appropriate Sections of the Building Act was generally not specifically recorded, with compliance with Sections 112, 115 and 118 often not documented (although some information was included under specific code clauses). The BCA did not appear to be giving consideration to the content of fire reports and the “as near as reasonably practicable” arguments provided, but were instead accepting them as evidence on face value. **See CAR 3.**

There were occasions where “Not Applicable” had been recorded for applicable code clauses (even though in some cases it appeared that the clause had been considered). **See CAR 3.**

Plumbing and drainage and backflow prevention requirements were often not provided in applications and not required by processors to demonstrate compliance with the Building Code (although it is up to the BCA to determine the appropriate level of information they require to be satisfied on reasonable grounds”). The work described in the application and the work described in the plans and specifications often varied although there was no recognition by the processors of the difference. **See CAR 3.**

Received Producer Statements were of an inconsistent quality yet all appeared to have been accepted without requiring further information. **See CAR 3.**

It was noted on a couple of occasions that the quoted dollar value of the work did not relate to the amount of work described in the application yet this was not identified as part of receiving or by the processor.

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 consent documents are required to comprise of the requirements of Form 5 of the Forms Regulations together with a list of required inspections. Review of issued consents with specified systems revealed that some stated that a Compliance Schedule was not required for the building when there was a requirement for a Compliance Schedule. At times the statement “A Compliance Schedule is/is not required for this building” was present but incorrect. **See CAR 1.**

Building Consents with specified systems are required to list the specified systems and their performance standards. While the BCA was generally listing the Specified System(s) it was not consistently adding the performance standard(s) to the building consents.

Records showed that Building Consents had not been consistently issued within the statutory 20 working days. **See CAR 4.**

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 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). While all consents had been appropriately lapsed there was some evidence of lapsed consents being inappropriately “un-lapsed”. **See CAR 4.**

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

The BCA had documented its procedures for planning, managing and performing inspections.

Planning of inspections was assessed and found to be appropriate. Inspections were generally booked by phone with inspections being completed up to four days after booking at the time of the assessment (this wait was longer than generally expected due to staff leave and the Easter break).

From the inspections witnessed the technical expert was satisfied that inspections were being performed competently with appropriate outcomes being determined however only minimal records of reasons for decisions were being recorded. **See CAR 3.**

In some cases subsequent inspections had been passed without documented evidence of previously failed items being passed. **See CAR 3.**

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.

Upon completion of the building project, applicants are required to apply for a Code Compliance Certificate (CCC) using Form 6 of the Forms Regulations. Some of these applications were being accepted even though they were incomplete, especially with regard to specified systems contained within the building and/or date the work was completed. It is important that the BCA ensures that applications for CCC are not accepted unless all required information is provided. **See CAR 1.**

The BCA's process for deciding whether to issue a CCC on receipt of a CCC application involved the use of a checklist to ensure all appropriate information was provided before issuing of the CCC. Records of these checks were brief, with some examples noted where all of the required information had not been provided, yet CCC had been issued. **See CAR 1.**

Issued CCCs without specified systems generally met the requirements of Form 7 however those with specified systems did not list the Compliance Schedule as an attachment as required by the Forms Regulations. **See CAR 1.**

The BCA was unable to provide up to date reports regarding its compliance with the requirements to issue CCCs within 20 working days as TechOne was unable to provide appropriate reports. It was reported that all CCCs had been issued within the statutory timeframe however this could not be verified during the assessment. **See CAR 4.**

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

The BCA had an appropriate system for making a decision at 24 months whether to issue or refuse a CCC where an application had not been made. An appropriate decision had been made for all CCCs reviewed.

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.

Issued Compliance Schedules did not fully meet the requirements of the Act. Some did not include details of the make and where known model of the specified systems or the location of the systems. In some cases specific inspection, maintenance and reporting requirements of the specified systems were not fully listed on Compliance Schedules as provided by the applicant. **See CAR 5.**

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.

One Notice to Fix (NTF) was reviewed for compliance with the Forms Regulations. While it appeared to meet the requirements of the Regulations it had not been signed by a person with delegated authority to do so. **See CAR 1.**

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).

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

Enquiries and complaints were planned to be received by the front counter, by phone, or by building officers. The BCAs documented procedures included management of enquiries and complaints. It was reported that enquiries were generally managed without making a record although a record could be kept on the applications file. The Building Act requires all information related to an application to be retained on the application's file. It is therefore strongly recommended (**R2**) that any response to an enquiry that relates to information other than that addressed by the information detailed under Regulation 7(2)(a) is recorded on the applications file.

It was also reported that no complaints had been received.

## **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 and inspecting.

This regulation requires a BCA to have a sufficient number of staff and contractors with appropriate skills and competence to perform its building control and supporting functions. A review of statutory time frame information supplied revealed that the BCA had not achieved compliance with statutory timeframes for issue of building consents. CCCs were reported to have been issued within the statutory timeframes but this could not be substantiated.

The time frame between booking and completing an inspection was found to be up to 4 days (in part due to the Easter break and staff currently on annual and sick leave). Other functions (e.g. meetings, auditing, use of the Continuous Improvement system, lapsing and decision to issue CCCs at 24 months etc.) had not always occurred as planned.

**CAR 4** requests the BCA to have appropriate systems in place to ensure that it employs sufficient employees and contractors to fulfil its building control and supporting functions.

## **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).

The organisation used the National Competency Framework category system for its assessment of complexity of building projects.

Work was planned to be allocated for processing and inspection according to its complexity and the assessed competence of the staff however there were several examples of inspections that had been carried out by people who did not have the appropriate assessed competence and were not working under direct supervision. **See CAR 6.**

## 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.

There was a system in place for establishing the competence of a person who applied for employment however this aspect was not further reviewed during this assessment.

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 review of competence of most staff members had been undertaken approximately annually, with good records maintained and all aspects of regulation 10 (3) (a) to (f) having been considered.

Competence reviews for two staff members were overdue and two new employees had not had their assessments, yet were working without direct supervision. **See CAR 6.**

## 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.

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.

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.

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

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.

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

The BCA had a documented system for training however it had not been followed.

There was no record available of consideration of organisational training needs, training plans had not been recorded, planned training had not been provided, and there were no records of monitoring of the effectiveness of training. **See CAR 7.**

Professional development was not consistently recorded and the procedure for supervision had not been followed. **See CAR 7.**

### **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.

The BCA employed four contractors on a regular basis. The BCA had not followed its procedures for choosing and using contractors and there were only minimal records available for some of the contractors. The BCA had failed to record its review of the performance of its contractors. **See CAR 8.**

### **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 five Technical Leaders on a technical leadership matrix however technical leadership had not been identified for all code clauses and the Technical Leaders had not been formally appointed. Staff were not aware of who to go to for technical leadership for each code clause and two technical leaders had been identified for many clauses with no indication which person was the leader and which was the deputy. **See CAR 9.**

### **Regulation 14 Ensuring Necessary Resources**

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

The BCA had access to appropriate Standards using Standards-On-Line. It also had access to other information through the internet. All required standards reviewed at the Queenstown office were available. Availability of standards at the Wanaka office was not reviewed.

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

Technical facilities are considered to include communication equipment, tablets and computer hardware and software. The BCA had moved to TechOne for managing its processing and inspection activities. This was reported to be unable to provide a report on CCC timeframes which was considered to be unacceptable for a BCA of this size. **See CAR 4.** The slow internet connection between the Wanaka and Queenstown office had previously caused difficulty in accessing standards from the Wanaka office. This was not further discussed during this assessment.

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

There were records available of recent checks of equipment that required calibration. There was a difference in the tolerance allowed for thermometers between the record on the checksheet and the procedure but otherwise calibration was considered to be appropriate. The BCA could consider calibrating moisture meters in house using a test block of known electrical resistance rather than sending them for external calibration. **See R3.**

The BCA is required to document the records it will maintain and where and for how long they will be stored.

The quality manual documented record management requirements. Most required records were available during the assessment although one (the minutes of the 2015 strategic management review) could not be located. It is strongly recommended (**R4**) that the BCA ensure that it retains all of its records in the location described for the described period.

### 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 an organisational chart that recorded reporting lines and accountabilities within the BCA. Relationships with external organisations were also documented in the manual. The BCA's internal and external relationships were not focused upon during this assessment.

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. These were not reviewed during this assessment. A delegations manual recorded delegations for building control functions. This required updating to reflect current staff titles. It was especially noted that authority to issue Notices to Fix had not been delegated to any current staff members. **See CAR 1.**

### 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 number.

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.

The BCA had documented a procedure to ensure that all relevant documents relating to a building's file were present on the electronic file at CCC stage. Records reviewed demonstrated that required information was mostly provided before issue of CCC, with the exception of some files that related to buildings with specified systems and the requirement to receive a complete CCC application. **See CAR 1.**

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

Files were stored electronically, with some hard copy information also available. Records were found to be generally appropriately accessible, except as described elsewhere in this report.

### Regulation 17 Quality System

Regulation 17(1) requires a BCA to have an integrated Quality System and 17(2) defines requires 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 6 to 18 for clarity)

QLDC BCA had a documented quality system that included policies, procedures and systems for the management of its BCA functions. In some cases the procedures were not appropriate or were not effectively implemented. **See CAR 1.**

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.

QLDC BCA had documented a Quality Policy. This provided a number of objectives, some of which were measurable. Objectives were also documented in MS-03 and the manual also indicated that the BCA had defined a number of KPIs. These could not be located during the assessment.

In order for the BCA to be able to measure its performance there was a requirement for the BCA to have clear and measurable objectives. **CAR 10** requests that the BCA define and document one set of objectives/KPIs (or provides a clear link between the various objectives and KPIs) and measures its performance against them.

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

Monthly team meetings were planned with minutes documented. Due to a focus on other issues these were not reviewed during this assessment.

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

The BCA had documented a process for continuous improvement. Due to a focus on other issues these were not reviewed during this assessment.

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

The organisation had undertaken an audit of most of its systems in 2015 however enquiries, training and contractors had not been audited. The audits that had been completed had identified a number of non-conformances that the BCA was working to address.

Enquires and training had been audited early on 2016 however contractors' had still not been audited at the time of the assessment. While some internal audits had been carried out in 2016 some regulations had not been audited annually and "Choosing and Using Contractors" had not been audited for some time. The BCA is requested to implement a robust system for ensuring that internal audit of every building control and related function is undertaken at least annually. **See CAR 2.**

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

The BCA had documented a procedure for management of conflicts of interest (COI). The procedure did not include management of pressure on staff. It is strongly recommended (**R5**) that the procedure is amended to include all types of conflict of interest that staff may experience.

A number of conflicts of interest had been reported. These were mostly for staff with a financial interest in work accepted by the BCA.

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 BCA's processes for managing both internal and external communications were documented in the manual.

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

The BCA had documented a requirement to carry out annual Strategic Management Reviews. While a review was reported to have been undertaken in 2015 the minutes were not available during this assessment.

BCAs are required to undertake these reviews regularly (at least annually) and encouraged to undergo review more often during times of change to ensure appropriate plans are made for managing the changes. They should include a review of the BCAs performance against its objectives. This means that the BCA needs to have documented (and have available) clear and manageable objectives (KPIs). **See CAR 10.**

Regulation 17(3) requires a Quality Assurance manager to be named.

Stewart Geddes was named as the person responsible for the BCA's Quality System. He had informally delegated some of his responsibilities to a short term contractor.

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

The manual contained an appropriate procedure for management of complaints against professionals. This included recording any complaints made on a register to allow for appropriate monitoring.

During the assessment it was reported that the BCA had not made any complaints against building professionals so no further review of this topic was undertaken.

Regulation 17(4)(a) requires employee compliance with the BCA' quality assurance system.

Employee compliance with the BCA's quality assurance system was monitored using regulation based internal audits and technical audits. A number of these had been undertaken however many of the technical shortfalls identified during this assessment were not noted in these audits. **See CAR 2.**

## **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. All staff held or were working towards one of the defined qualifications.

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.

The BCA had defined reasons that staff could be exempt from holding one of the defined qualifications. These reasons appeared to be appropriate.

Regulation 18(3)(b) requires those staff and contractors with circumstances that make it unreasonable or impractical for them to hold the defined qualifications to be identified and recorded.

At the time of the assessment three staff members were named as being exempt from the requirements to hold an appropriate qualification.

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 1\*

## Regulation 5 - Requirements for policies, procedures, and systems

The policies, procedures, and systems required by these regulations must be

- (a) written or electronic; and
- (b) appropriate for their purposes

## Regulation 6 - Building consent authority's observance of policies, procedures, and systems

A building consent authority must record:

- (a) the means by which it ensures that it implements effectively the policies, procedures, and systems required by these regulations;

### Finding:

Some procedures did not provide sufficient information to ensure that staff could carry out the described processes appropriately. Others were observed where the procedures were not ensuring an appropriate outcome.

These included:

- The procedure for receiving appeared to be insufficient as some incomplete, incorrect or poor quality applications were observed to be accepted. These included applications where insufficient detail regarding specified systems had been provided. Other applications were observed to be made using copies of old plans where it was unclear what was new work and what work was part of a previous application. Little guidance regarding the required minimum quality of applications was provided to applicants. No minimum for acceptance had been set by the BCA making it difficult for staff to decide whether the application could be refused.
- The processing check sheets referred to long out of date Building Code requirements and the processing checklist sections regarding Waivers and Alternatives Solutions also required updating.
- The procedure for issue of Building Consents did not include required detail regarding the information about Compliance Schedules and Specified Systems that needed to be provided on the Building Consent. Evidence of not having a sufficiently robust procedure included some building consents that incorrectly stated that a Compliance Schedule was not required for the building when there was a requirement for a Compliance Schedule. Others did not include the statement "A Compliance Schedule is/is not required for this building".
- The procedures for inspection did not ensure that all previously failed inspection items were cleared before passing the next inspection.
- Procedures for issue of Code Compliance Certificates did not ensure that Form 6s were fully complete before acceptance including the date the work was completed and details regarding Specified Systems. Some applications for CCC had been accepted even though they were incomplete.
- The procedure for issue of Code Compliance Certificates did not ensure that all required information was provided and recorded as having been received before issue of CCC. Evidence of not having a sufficiently robust procedure included some examples where all of the required information had not been provided, yet CCC had been issued. CCCs with specified systems did not list the Compliance Schedule as an attachment as required by the Forms Regulations.
- The procedure for issue of Notices to Fix did not ensure that appropriate delegation for their issue had been provided.

Numerous cases were observed during this assessment where the BCA was not following their documented procedures.

**Action required:**

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

**Signed:**

**Date:**

**Attachments:** Yes / No

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**Clearance by IANZ:**

**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 2\*

## Regulation 6 - Building consent authority's observance of policies, procedures, and systems

A building consent authority must record:

- (a) the means by which it ensures that it implements effectively the policies, procedures, and systems required by these regulations; and

## Regulation: 17 (2) (h) - Assuring Quality - Internal Audits

The quality assurance system must cover the following:

- (h) the procedure for ensuring that an internal audit of every building control function occurs within 12 months of the completion of the last internal audit of the function;

### Finding:

QLDC BCA had elected to demonstrate its effective implementation of its systems, policies and procedures using internal audits however some regulations had not been audited during the last 12 months.

Employee compliance with the BCA's quality assurance system was monitored using technical audits. A number of these had been undertaken however many of the shortfalls identified during this assessment were not noted in these audits.

### Action Required:

Please provide a plan that details how the BCA will address the identified shortfalls in ensuring effective implementation of its policies, procedures, and systems.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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For Building Consent Authority use:

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**Signed:**

**Date:**

**Attachments:** Yes / No

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**Clearance by IANZ:**

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**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 3\*

## Regulation 6 - Building consent authority's observance of policies, procedures, and systems

A building consent authority must record:

- (b) the decisions it makes under the policies, procedures, and systems required by these regulations; and
- (c) the reasons for the decisions; and
- (d) the outcomes of the decisions

## Regulation 7 (2) - Performing building control functions

1. A building consent authority must have policies and procedures for performing its building control functions.
2. The policies and procedures must cover the following:
  - (d) For applications that comply with the requirements that the Act and any applicable regulations under the Act specify for applications,
    - (iv) processing the applications; and
  - (e) planning, performing, and managing inspections;
  - (f) issuing and refusing to issue code compliance certificates, compliance schedules, and notices to fix

### Finding:

Recording of the reasons for processing decisions was found to be inconsistent, varying between good reasons for decisions being recorded and no reasons being recorded. Items not well considered included all relevant code clauses, sections of the Building Act (especially sections 112, 115 and 118), fire reports, and plumbing and drainage (including backflow prevention).

There was generally minimal recording of inspection decisions. In some cases subsequent inspections had been passed without evidence of previously failed items being addressed.

Received Producer Statements were of an inconsistent quality yet all appeared to have been accepted without appropriate reasons for those decisions being recorded.

CCCs were observed to have been issued when the records indicated that insufficient information had been received to justify their issue.

### Action Required:

Please provide a plan that details how the BCA will address the identified shortfalls in ensuring that it records its decisions, reasons for decisions and outcomes.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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**Date:**

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**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

**CAR No: 4\***

## Regulation 8 - Ensuring enough employees and contractors

1. A building consent authority must have a system for ensuring that it has enough employees and contractors to perform its building control functions.
2. A building consent authority must have a system for assessing the need to employ contractors if it does not have enough employees to perform its building control functions

## Regulation 7 (2) (d) - Performing building control functions

1. A building consent authority must have policies and procedures for performing its building control functions.
2. The policies and procedures must cover the following:
  - (d) For applications that comply with the requirements that the Act and any applicable regulations under the Act specify for applications,
    - (v) granting, refusing to grant, and issuing building consents;
  - (f) issuing and refusing to issue code compliance certificates, compliance schedules, and notices to fix

## Regulations 9 to 13, 15 and 17 – Allocation of work, competence assessment, training, contractors, technical leadership, organisational records, quality system.

### Finding:

Records showed that Building Consents had not been consistently issued within the statutory 20 working days.

The BCA was unable to provide up to date reports regarding its compliance with the requirements to issue CCCs within 20 working days as TechOne was unable to provide appropriate reports. This meant that the BCA could not easily monitor its compliance with CCC statutory timeframes.

Other building control and supporting functions had not been carried out or had been carried out incorrectly. This included the “un-lapsing” of appropriately lapsed consents.

### Action Required:

Please develop and implement appropriate systems to ensure that the BCA employs sufficient employees and contractors, with appropriate competence, to fulfil its building control and supporting functions.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

**Signed:**

**Date:**

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# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

**CAR No: 5**

## **Regulation 7 (2) (f) - Performing building control functions**

1. A building consent authority must have policies and procedures for performing its building control functions.
2. The policies and procedures must cover the following:
  - (f) issuing compliance schedules

### **Finding:**

Many issued Compliance Schedules did not fully the requirements of the Act. Some did not include details of the make and where known model of the specified systems or the location of the systems. In some cases specific inspection, maintenance and reporting requirements of the specified systems were not fully listed on Compliance Schedules as provided by the applicant.

### **Action Required:**

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems for preparing and issuing of Compliance Schedules and associated documentation.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

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**Date:**

**Attachments:** Yes / No

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**Clearance by IANZ:**

**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

**CAR No: 6**

## Regulation 9 - Allocating work to competent employees or contractors

A building consent authority must have a system for allocating its building control function work to employees or contractors who are competent to do the work.

## Regulation 10 - Establishing and assessing competence of employees

2. A building consent authority must have a system for regularly **assessing** the competence of its employees performing building control functions.
3. The competence assessment system must cover the following:
  - (a) employees' understanding of the philosophy and principles of building design and construction; and
  - (b) employees' understanding and knowledge of building products and methods; and
  - (c) employees' knowledge and skill in applying the Act, the building code, and any other applicable regulations under the Act; and
  - (d) employees' ability to:
    - (i) process applications for building consents; and
    - (ii) inspect building work; and
    - (iii) certify building work; and
  - (e) employees' ability to communicate with internal and external persons; and
  - (f) employees' ability to comply with the building consent authority's policies, procedures, and systems

### Finding:

There were several examples of inspections that had been carried out by the two new staff members without direct supervision. These inspectors were yet to have their competence assessed (and therefore were not on the skills matrix).

Competence reviews for two staff members were overdue.

### Action required:

Please provide a plan that details how the BCA will address the identified shortfalls in its competence assessments.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

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**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 7\*

## Regulation 11 - Training employees

1. A building consent authority must have a system for training its employees who perform the authority's building control functions by doing a technical job.
2. The system must cover the following:
  - (a) making regular training needs assessments; and
  - (b) preparing training plans that specify the training outcomes required; and
  - (c) ensuring that employees receive the training agreed for them; and
  - (d) monitoring and reviewing employees' application of the training they have received, including by observing relevant activities; and
  - (e) supervising employees under training; and
  - (f) recording employees' qualifications, experience, and training; and
  - (g) recording continuing training information

### Finding:

There was no record available of consideration of organisational training needs.

Training plans had not been recorded.

Planned training had not been provided.

There were no records of monitoring of the effectiveness of training.

Professional development was not consistently recorded.

The procedure for supervision had not been followed.

### Action required:

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems for training employees.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

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**Attachments:** Yes / No

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**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 8

## Regulation 12 - Choosing and using contractors

1. A building consent authority must have a system for choosing and using contractors to perform its building control functions.
2. The system must cover the following:
  - (a) establishing contractors' competence; and
  - (b) engaging contractors; and
  - (c) making written or electronic agreements with contractors; and
  - (d) recording contractors' qualifications; and
  - (e) monitoring and reviewing contractors' performance; and
  - (f) regularly assessing contractors' competence

### Finding:

The BCA had not followed its procedures for choosing and using contractors.

There were only minimal records available for some of the contractors.

The BCA had failed to record a review of the performance of its contractors.

**Note:** The BCA had not performed regular audits on its compliance with its requirements for choosing and using contractors. If it had done so it is possible that the many failures in implementation of the BCA's procedures for choosing and using contractors may have been identified and addressed earlier and therefore not raised as a CAR during this assessment.

### Action required:

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems for choosing and using contractors.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note 1.** A further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

**Note 2.** It is suggested that the plan specifically include internal audit of the BCA's compliance with this regulation.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

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**Attachments:** Yes / No

---

**Clearance by IANZ:**

**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

**CAR No: 9**

## Regulation 13 - Ensuring technical leadership

A building consent authority must have a system for:

- (a) identifying employees and contractors who are competent to provide technical leadership; and
- (b) giving the employees and contractors the powers and authorities to enable them to provide the leadership

### Finding:

Technical leadership had not been identified for all code clauses.

Technical Leaders had not been formally appointed and staff were not aware of who to go to for technical leadership for each code clause.

Two Technical Leaders had been identified for many code clauses with no indication which person was the leader and which was the deputy.

### Action required:

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems for identifying and empowering Technical Leaders.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 10

## Regulation: 17 (2) - Assuring Quality

The quality assurance system must cover the following:

- (b) the policy on quality;
- (n) the procedure for the building consent authority's management to review the effectiveness of the authority's quality assurance system.

## Regulation: 17 (5) - Assuring Quality - Management Review

A building consent authority must have a system for periodically—

- (a) reviewing its quality assurance system; and
- (b) making appropriate changes in the quality assurance system.

### Finding:

While a Strategic Management Review was reported to have been undertaken in 2015 the minutes were not available during this assessment.

In order for the BCA to be able to measure whether its quality system is appropriate and effective (as an essential part of Strategic Management Review) the BCA needs to have established and clear and manageable objectives (KPIs). The BCA was yet to complete this task.

### Action required:

Please provide a plan that details how the BCA will address the identified shortfalls in its policies, procedures and systems for reviewing the appropriateness and effectiveness of the authority's quality assurance system.

Once accepted, please implement the plan and provide evidence of effective implementation.

**Note** that a further assessment will be undertaken in October 2016 to ensure that implementation has been effective.

Agreed clearance date: **Plan to be provided no later than 13 May 2016.**

**Evidence of initial implementation to be provided no later than 15 July 2016.**

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For Building Consent Authority use:

**Action taken:** (please refer to any attachments)

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**Signed:**

**Date:**

**Attachments:** Yes / No

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**Date:**

## RECOMMENDATIONS

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

- R1. It is **strongly recommended** that the BCA updates its public information to ensure that full information is provided regarding how to apply for a building consent and how a building consent is processed, inspected and certified. This information should provide the minimum requirements for building consent applications and provide applicants with a clear understanding of the process.
  
- R2. It is **strongly recommended** that any response to an enquiry that relates to information other than that addressed by the information detailed under Regulation 7(2)(a) is recorded on the applications file.
  
- R3. It is recommended that the BCA could consider calibrating moisture meters in house using a test block of known electrical resistance rather than sending them for external calibration.
  
- R4. As a result of the records of the 2015 strategic management review not being able to be located it is **strongly recommended** that the BCA ensure that it retains all of its records in the location described, for the described period.
  
- R5. It is **strongly recommended** that the procedure for management of conflicts of interest is amended to include all types of conflict of interest that staff may experience, including management of pressure on staff.