



BUILDING CONSENT AUTHORITY ACCREDITATION  
ASSESSMENT REPORT

Christchurch City Council  
Building Consent Authority

Initial Assessment  
Follow Up

3 to 6 November 2014

# ASSESSMENT REPORT

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## Organisation Details

Organisation: Christchurch City Council  
Building Consent Authority  
Address: 53 Hereford Street  
Christchurch Central  
Christchurch 8011

Client Number: 7486

Application Number: 85

Authorised Representative: Mr Robert Wright

Programme: Building Consent Authority Accreditation

## Assessment Team

Lead Assessor: Mrs Adrienne Woollard

Technical Experts: Mr Andrew Tyer  
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## Report Preparation

Prepared by: Adrienne Woollard

Signature:



Checked by: Geoff Hallam

Signature:



Date finalised: 17 November 2014

## Introduction

The Building (Accreditation of Building Consent Authorities) Regulations 2006 came into force in February 2007. The intent of the regulations was to clearly define the essential elements of building control as practised by building consent authorities (BCAs). To achieve accreditation a BCA must demonstrate both the competence and the capacity to sustainably meet their regulatory responsibilities in providing effective building control services to their community. The assessment process is undertaken by a team of independent technical experts whose task is to gather objective evidence on which a sound decision regarding on-going compliance can be based. Accreditation assessments of all BCAs in New Zealand have taken place regularly since 2007. The same regulations and interpretations of regulations are applied to all BCAs. IANZ does not have any discretionary powers to interpret the regulations differently according to the circumstances of individual BCAs.

This report relates to a follow up visit carried out on 3 to 6 November. This followed the initial assessment of the Christchurch City Council BCA which took place between 8 and 18 July 2014 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.

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 the Christchurch City Council. Where some items relating to legal requirements such as health and safety may have been identified, this does not represent an exhaustive report on 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

Christchurch City Council BCA applied for accreditation as a BCA on 7 May 2014, after having their accreditation revoked in 2013. An initial assessment was carried out on 8 to 18 July 2014. During that assessment it was determined that although significant progress had been made towards implementation of the requirements of accreditation, many of the changes were very recent and some processes were only partially implemented.

The report relating to the initial assessment identified areas of critical non-compliance as Corrective Action Requests (CARs). Areas of less critical non-compliance, or where further evidence of implementation was required, were identified as strong recommendations. The BCA was required to satisfactorily address all the identified issues before accreditation could be offered.

This follow-up to the July assessment considered the effective implementation of the solutions implemented by the BCA, including the sustainability of those solutions. The BCA was found to have made significant progress towards meeting the requirements of accreditation although some issues were yet to be fully addressed. Others had been so recently addressed that evidence of sustainable implementation was yet to be provided.

Accreditation will be granted to the BCA once evidence of clearance of all CARs from the initial assessment has been provided, including provision of evidence of on-going and sustainable implementation. Most of the CARs and all of the Strong Recommendations have been cleared.

Following clearance of the remaining CARs a date for the next accreditation assessment will be set. Due to the many changes to the systems and the lack of evidence of on-going implementation this is likely to be approximately one year after the initial assessment. (August 2015)

## Conditions of Accreditation

During the initial assessment some instances were identified where the systems or procedures were not in conformity with the stated requirements or applicable technical documents. These were detailed in Corrective Action Request (CAR) Forms numbered 1 to 9 and in strong recommendations numbered SR1 to SR8.

During this follow up visit CARs 2 to 4 and 8 to 9 and SRs 1 to 8 were cleared. CARs 1, 5, 6 and 7 are still to be fully addressed, although some aspects of these CARs were also cleared. The remaining evidence requested is required to support very recent changes; it does not require further significant change or new systems to be implemented.

Further explanations of the requirements or portions of the CARs still to be addressed are detailed in this report. IANZ does not impose any timescale on the clearance of non-conformances raised during initial assessments. However, accreditation cannot be granted until all CARs have been satisfactorily addressed.

Please complete the appropriate section of each CAR explaining your corrective actions and forward a copy along with any supporting documents and records, as appropriate, to International Accreditation New Zealand 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 International Accreditation New Zealand. The Complaints and Appeals procedure is contained in the International Accreditation New Zealand document "Procedures and Conditions of Accreditation".

# 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 must be-

- (a) Written or electronic
- (b) Appropriate for their purpose

## 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

## Finding

The content of Form 7 was at times inappropriate.

- 1) Where a project required a compliance schedule there was no statement made on the Code Compliance Certificate (CCC) that the specified systems were capable of performing to the performance standards set out in the building consent.  
**This had still not addressed at the time of the November assessment.**
- 2) The Current Lawfully Established Use was not recorded in some cases. IANZ recommends that the Building Regulations 1992, Schedule A1 could be used to define Current Lawfully Established Use.

## Actions Required

Please review procedures for issue of CCC to ensure all appropriate information is provided.

Please review the template used for preparing CCCs to allow for inclusion of the statement that "the specified systems were capable of performing to the performance standards set out in the building consent" as required.

Please provide training and on-going review (audit) to ensure that all CCCs are appropriately completed and that they include the statement that the specified systems are capable of performing to the performance standards set out in the building consent, where relevant.

Please also ensure that each CCC includes the Current Lawfully Established Use.

Once full implementation has been established please provide evidence of monitoring of at least 20 issued CCCs per week, including both residential and commercial projects, that indicates full compliance with these requirements, for at least two consecutive weeks.

Agreed clearance date: **Prior to accreditation**

For Building Consent Authority use:

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

**Signed:**

**Date:**

**Attachments:** Yes / No

**Clearance by International Accreditation New Zealand:**

**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 5

## **Regulation 8 -Ensuring enough employees and contractors states:**

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

## **Findings from July Assessment:**

A number of measures indicated that the BCA was not appropriately managing its requirements to have sufficient employees or contractors to perform its building control functions

These included:

- Vetting of applications was taking up to 10 working days.
- KPIs, including reasons for not meeting statutory timeframes, were not being analysed during leadership and unit meetings as per the procedures.
- The BCA was only 89% compliant with meeting the statutory clock for processing residential consent applications for May 2014.
- The BCA was only 30% compliant with meeting the statutory clock for processing commercial consent applications for May 2014.
- There was at times a significant (up to 7 days) delay between granting and issuing of a consent.
- The BCA was only 70% compliant with meeting the statutory clock for processing CCC applications for May 2014.
- As at 10/7/14 the waiting time for residential inspections was an average of nine days, waiting time for commercial inspections was an average 9.8 days and the waiting time for plumbing and drainage inspections was an average of 4.8 days from booking to completion. "Plan on a Page" requires inspection booking times to be a maximum of three days.
- The reasons for failure to meet the BCAs inspection time expectations were not monitored or documented.
- Indirect Supervision of Inspectors performing Residential inspections while still developing competency had not occurred from late June to mid-July 2014.

## **Findings from November 2014:**

- During the latest monitored period from 27 October to 2 November the BCA was only 87% compliant with meeting the statutory clock for processing building consent applications (90% of BCs received post 1 Aug). As at 6 November commercial applications were at 75% (up from 33%).
- During the latest monitored period from 27 October to 2 November the BCA was only 48% compliant with meeting the statutory clock for processing CCC applications (81% of CCCs received post 1 Aug).
- As at 2 November the average waiting time for inspections was 6.4 days. The BCA had a defined KPI requiring inspection booking times to be a maximum of three days.
- Indirect Supervision of staff performing inspections had been carried out as planned however there had only very recently been follow-up of those inspectors that did not carry out an appropriate inspection. (CI 420 in the system to resolve this issue)
- Internal audits had been planned for the near future however resourcing for those audits was yet to be addressed.
- The BCA had identified the need for two new quality assurance roles that were yet to be filled.

**Actions Required**

Please provide a plan to address on-going resourcing of inspection, supervision, and auditing functions.

Please continue to implement the current systems for ensuring that all regulatory targets and in-house expectations are met on an on-going basis.

Please provide evidence of weekly monitoring of issue of Building Consents and Code Compliances Certificates to IANZ for review, including recorded reasons for each instance of over-run and records of actions planned and taken to improve performance, until such time that substantial compliance with all regulatory performance criteria can be demonstrated for four consecutive weeks.

Agreed clearance date: **Prior to accreditation**

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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 International Accreditation New Zealand:**

**Signature:**

**Date:**

# CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 6

## Regulation 11 - Training employees states:

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:
  - (e) supervising employees under training;

## Findings

While supervision, where required, during the receiving, vetting and lodgement stages was found to be appropriate, supervision of staff undertaking processing and inspection outside of their competence had only recently been implemented.

Records of supervision of processors showed that insufficient reasons for decisions were recorded.

While indirect supervision of inspectors under supervision was found to be fully compliant on Monday 3 November, there was insufficient evidence available to demonstrate the sustainability of the system for indirect supervision of inspectors.

As some Code Compliance Certificates did not meet the requirements of the Forms Regulations it would appear that further supervision of staff completing this work may be required.

## Actions Required

Please provide evidence to IANZ to demonstrate sustained effective operation of the systems for supervision.

For processing this may include the results of monitoring, across both Residential and Commercial applications, for two weeks, that demonstrate adequate supervision, including satisfactory recording of reasons for decisions.

For inspection, please provide a copy of the supervision monitoring spreadsheet and a representative sample of records (15 records each week, over a range of inspection types) that demonstrate appropriate supervision and actions taken should competence not be demonstrated.

Note: Issuing Code Compliance Certificates has been addressed under CAR 1.

Agreed clearance date: **Prior to accreditation**

For Building Consent Authority use:

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

**Signed:**

**Date:**

**Attachments:** Yes / No

**Clearance by International Accreditation New Zealand:**

**Signature:**

**Date:**



## CORRECTIVE ACTION REQUEST

Building (Accreditation of Building Consent Authorities) Regulations 2006

CAR No: 7

### Regulation 12 – Choosing and using Contractors states:

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

### Findings

The procedure for management of Contractors was amended during the assessment, along with some amendments to the Contractor Register. These amendments included addressing the requirements for Qualifications of Contractors.

A number of contract variations had been developed however these were yet to be agreed by the contractors involved (with one exception).

Recent audits carried out by the BCA demonstrated that full compliance with this Regulation was yet to be established.

### Actions Required

Please ensure effective implementation of all procedures regarding contractors, including ensuring that appropriate contracts are held with all contractors, and that their performance and competence is reviewed as described in the BCA's procedures, and in accordance with this Regulation.

Please demonstrate that effective implementation has been achieved by providing evidence of on-going audits, including any required Corrective Actions.

Where full compliance is yet to be achieved please provide the plan to address these issues and evidence of implementation of the plan to demonstrate compliance with this Regulation.

Agreed clearance date: **Prior to accreditation**

For Building Consent Authority use:

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

**Signed:**

**Date:**

**Attachments:** Yes / No

**Clearance by International Accreditation New Zealand:**

**Signature:**

**Date:**

## 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 manual, located in the Vault, documented policies, procedures and systems that were intended to address the requirements of each regulation.

Content of Code Compliance Certificates (Form 7) was, on occasions, not fully appropriate (see Regulation 7). Where the content of a Form is regulated under the Forms Regulations the BCA is requested in, **CAR 1**, to revise its Form 7 template and use of that template, to establish compliance with those regulations.

### 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;

The BCA had elected to use internal audit as its method for ensuring appropriate implementation. While completed audits generally met the requirements for ensuring effective implementation of procedures some audits did not cover all the requirements of the specific regulation the procedure was intended to address. Internal auditing is also commented on under Regulation 17(2)(h) and in R1.

6(b), (c) and (d) The BCA is required to record the decisions it makes under the policies, procedures and systems required by the regulations, the reasons for those decisions and the outcomes of the decisions.

Compliance with these clauses is commented upon under the relevant Regulations.

### Regulation 7 - Performing Building Control Functions

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 appropriate systems for receiving, vetting and lodgement of building consents and amendments. During this assessment these systems were observed to be appropriately implemented, with training and audits undertaken. The BCA is now aware of reasons for any vetting delays. A significant improvement in all aspects of receiving, vetting and lodgement of building consents was observed. **CAR 2** is cleared.

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 BCOs was based on a combination of the BCA's Building Categorisation System and the Internal Skills Matrix or the External Consultant Register. A strong recommendation (**SR2**) was made during the July assessment to review the process of work allocation, and the documented procedure that describes it, to ensure that inappropriate allocation of work does not occur. During this assessment all work appeared to be appropriately allocated. **SR 2** is cleared.

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

The BCA had documented and implemented appropriate procedures and checksheets for processing of building consent applications although it was noted that a further improvement could be made in the recording of reasons for processing decisions. **See R2.**

The BCA demonstrated an appropriate system for management of complex applications that required review by specialists.

The BCA had a large throughput of building consent applications and applications for amendments to building consents. During the previous assessment there was some evidence that, for most applications, appropriate decisions to issue a building consent or amendment had been made; however, for a considerable number there was insufficient recording of reasons for processing decisions as required by the regulations. During the November visit, records reviewed demonstrated that in general it was clear what had been considered when making the decision to grant a building consent and sufficient information had been provided.

**CARs 1 and 3** were raised during the July assessment, requesting that the BCA document and implement appropriate procedures for processing of building consent and amendment applications to ensure that appropriate decisions were made and adequate reasons for decisions were recorded. CAR 1 (as relating to processing) and CAR 3 were cleared during this review.

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).

Records indicated that the BCA had not been able to fully meet the statutory requirement for processing of consent applications within 20 working days. The BCA was actively working to improve its compliance with timeframes however it was yet to fully comply. **See CAR 5.**

During the July assessment it was identified that Building consents with specified systems did not specifically list the specified systems that must be covered by the compliance schedule or their performance standards although these were listed on an attached draft compliance schedule. This was identified in **CAR 1**. This issue had been addressed and this part of **CAR 1** was cleared during this visit.

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

The BCA had good processes in place for carrying out of inspections; with procedures now documented to describe the process. During this visit, inspection records were observed to be generally appropriate and the BCA had reviewed its process for managing complex inspections (large commercial/apartments etc.). This was observed to now also be appropriate.

While work was still being allocated to inspectors that was outside of their recorded competency these inspectors were now supervised using indirect supervision. This system had only recently been implemented at the time of the assessment and further evidence of the supervision and its effectiveness is required. **See CAR 6.**

The BCA had specified that inspections would occur within three working days of booking however, as at 2 November 2014, inspections were taking an average of 6.4 days from booking to completion. The BCA recognised that these statistics may be skewed by applicants booking advanced inspections and was planning to review the way the statistics were generated. On 5 November an applicant wishing to book an inspection would need to wait five days before it could be carried out, which was still above the BCAs target timeframe. **See Regulation 8 and CAR 5.**

**Issuing Code Compliance Certificates (CCCs)** - 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.

The BCA was observed to be accepting CCC applications in an appropriate manner. SR 4, raised during the July assessment, is cleared.

The BCA was also issuing generally appropriate Code Compliance Certificates. Some of these were not issued within the statutory 20 working day time period. In the week to 2 November 2014 the BCA was only 48% compliant with meeting the statutory clock for processing CCC applications. **See Regulation 8 and CAR 5.**

During the July assessment several examples were found where CCCs had been issued where there was insufficient evidence of the specified systems being appropriately installed and commissioned/tested/inspected. It was strongly recommended (**SR3**) that the BCA had appropriate processes in place to ensure that all required information was provided before the CCC was issued and most importantly that the information provided was appropriate, complete and correct.

While many examples were found during this assessment where appropriate information had been received there were still some examples found where relevant information regarding specified systems was not on the applications file yet the CCC was issued. The BCA indicated that it had plans to review the systems regarding specified systems, compliance schedules and CCC issue. **SR 3**, raised during the July assessment, was cleared but another strong recommendation (**R3**) is made to ensure that the BCA has appropriate processes in place to ensure that all required information is provided before the CCC is issued, particularly regarding specified systems, and that the information provided is appropriate, complete and correct.

Section 94 of the Building Act and Form 7 require that if specified systems are included in the building consent, a statement is made on the Code Compliance Certificate that the specified systems are capable of performing to the performance standards set out in the building consent. This statement was not being applied consistently to the consents to which it related. It is requested in **CAR 1** that all issued Code Compliance Certificates comply with the requirements of the Forms Regulations. This issue, while raised back in July, was still to be addressed.

**Issuing Compliance Schedules** - 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.

A draft compliance schedule was issued with the building consent (and noted on the building consent as an attachment) as the means of recording the specified systems identified in the application and their performance standards.

Compliance schedules were not always issued on the same day as the CCC however they appeared to be sent to the client together. They were found to be generally appropriate however on a number of occasions the make and model (when known) of the specified system was not recorded. This requirement should be clearly documented in the procedures. **See R3.**

## **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.

BCA procedures required the BCA to maintain a resourcing strategy which included a forecasting model that was to be updated on a regular basis. Records demonstrated that this process was occurring. This BCA had the ability to process all types of consents in-house. The BCA was however outsourcing work to a large number of contractors due to the high workload.

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.

When reviewing whether the BCA had sufficient resources the following positive points were observed:

- Competency assessments were up to date.
- Internal audits were up-to-date according to the BCA's annual schedule of audits.
- Operations meetings were happening regularly
- Continuous improvements that had been entered in the system were generally being progressed in a timely fashion.
- Monitoring of accredited BCA contractors had begun to occur as planned. The first five consents processed by a contractor and every subsequent twentieth were reviewed for appropriateness of technical decision making.

However a number of measures indicated that the BCA was not effectively managing the requirement to have sufficient employees or contractors to perform its building control functions (also mentioned elsewhere in this report).

These included:

- During the latest monitored period from 27 October to 2 November the BCA was only 87% compliant with meeting the statutory clock for processing building consent applications (90% of BCs received post 1 Aug). As at 6 November commercial applications were at 75% (up from 33%).
- During the latest monitored period from 27 October to 2 November the BCA was only 48% compliant with meeting the statutory clock for processing CCC applications (81% of CCCs received post 1 Aug).
- As at 2 November the average waiting time for inspections was 6.4 days. The BCA had a defined KPI requiring inspection booking times to be a maximum of three days.
- Indirect Supervision of staff performing inspections had just begun to be carried out as planned however there had only very recently been follow-up of those inspectors that did not carry out an appropriate inspection. (CI 420 had been raised to resolve this issue)
- Internal audits had been planned for the near future however resourcing for those audits was yet to be addressed.
- The BCA had identified the need for two new quality assurance roles that were yet to be filled.

These issues may be due to insufficient resources being available. Note that resources are not simply numbers of people employed but available work hours of persons with the required competencies.

**CAR 5** requests that the BCA develop and implement systems to ensure that it has enough resources (employees and contractors) to perform its building control functions in a timely manner.

## **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).

Allocation to BCO's was based on a combination of the BCA's building categorisation system and the skills matrix. The BCA's categorisation system was appropriate and the skills matrix was up-to-date. The BCA had revised its system for allocation of inspections to appropriate staff, including supervision of staff that were yet to gain appropriate competencies. **CAR 4** is cleared.

## 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.

The BCA had documented a system for assessing the competence of “people wishing to apply”. This procedure had been appropriately implemented. Strong recommendation **SR5** is cleared.

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.

The BCA utilised the national competence assessment framework both in respect of the “categorisation system” and the assessment process.

Competence assessments were performed such that all personnel had a current and appropriately documented assessment. These had been undertaken by either an external contractor or by the BCA’s own personnel. The BCA amended its procedure for moderation between assessors during this assessment. It appeared to be appropriate and to reflect the current process. Strong recommendation **SR6** is cleared.

## 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 had developed a generally robust system for training however the system had not been fully documented. This had been addressed before the November visit and this part of **CAR 1** is cleared.

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.

The BCA’s procedures for supervision were substantially appropriate however they had only recently been fully implemented.

**CAR 6** requested that supervision of processing, with a supervisor reviewing the work of the processor that was developing competency using the processing form to record the supervision process, be reviewed to ensure that appropriate records are kept, including reasons for the decision that the trainee processor had performed the work competently (or not). Reasons for processing supervision decisions were still not being appropriately recorded. This part of **CAR 6** was not cleared.

The BCA had documented its procedures for indirect supervision for inspectors that were deemed able to work with less supervision. This part of **CAR 1** is cleared.

Indirect supervision for inspections in a timely manner had only very recently commenced. There was insufficient evidence available of sustained implementation. **See CAR 6.**

It had been previously observed that Code Compliance Certificates were, on occasions, issued by persons who did not have the recorded competency for that category of building. This had been addressed and this part of **CAR 6** is cleared.

## 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.

A large proportion of the BCA's work was performed by contractors. Most were related to processing of applications for building consents.

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

The graphic in the contractors' procedure demonstrated that CCC BCA intended to assess the competence of "external contractors", which were identified as accredited BCAs, non-accredited organisations or individuals, in a range of ways. These included individual competency assessment of the person carrying out the work, review of the accreditation record of the contracted BCA or review of membership of a relevant professional body. The BCA Contractors and Consultants Register (Form B-612) was not entirely up to date in a number of ways, including the record of contractor's competencies. This was addressed during the November visit.

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

The BCA had a system for engaging contractors as required. This system was yet to become fully effective for the management of contractors.

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

The BCA was yet to make appropriate agreements with contractors that allowed for the measurement of performance and competence. **See CAR 7.**

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

While it was documented that information regarding qualifications would be recorded in the BCA Contractors and Consultants Register (Form B-612) a number of contractors had this column marked as N/A. This was addressed during the November visit.

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

The procedures provided for (a minimum of) annual review of contractors, with review of contractors generally for the first 5 consents then 1 in 20 consents after that. A number of these reviews had been recently undertaken. These involved monitoring of the work sent to the contractor and, when returned, a review of the performance to the KPIs and of the technical validity of contractors' work. These reviews were recorded on Form B-617E. This form also had a space allowed for recording of issue resolution, with guidance notes provided, however this was not being used and issue resolution was being recorded on the BCA Contractors and Consultants Register (Form B-612) under the Contractors Issue Register. It is recommended (**R4**) that the form is reviewed to ensure that it continues to meet the BCA's needs.

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

The documented procedures required an annual assessment (or confirmation) of competency. For all except one contractor records of competence were recorded as being held on file, with the final one being added during the November visit. This part of **CAR 7** is cleared.

### 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, in a register, a number of Technical Leaders for various aspects of the BCA's work.

Each technical leader had been assessed for their ability to perform as a technical leader, with appropriate evidence considered. Appropriate records of the assessment were maintained.

### Regulation 16 Filing Applications for Building Consent

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's system for ensuring that all relevant information was placed on the application's file comprised two parts; a check prior to granting consent and another prior to issuing the Code Compliance Certificate.

In respect of both parts, the documented management system identified a range of records that may be present on an application's file. A review of these 'lists' indicated that the content required was satisfactory and, in the examples reviewed during this assessment, the files included all required information.

Strong recommendation **SR7** is cleared.

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

Files were maintained in TRIM with TRIM records now being "locked". Evidence reviewed demonstrated that consent files were generally accessible and retrievable and contained relevant records.

Strong recommendation **SR8** is cleared.

### Regulation 17 Quality System

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

The procedure described a system for continuous improvement that had been recently implemented. The BCA was still to appoint people into the identified roles of CI Advisor and Process & Systems Advisor (this role was discussed during the assessment but not referred to in the procedure). The role of CI Advisor was being temporarily filled by another staff member however there was no plan to address this resourcing shortfall on an on-going basis. **CAR 5** requires the BCA to ensure that it has enough employees and contractors to perform its building control functions. Consideration should also be given to ensuring that the BCA has enough staff to complete all supporting BCA functions in a timely manner.

Trials and pilots were managed through the CI system. A suitable template for planning, managing and recording trials and pilots had been developed. Evidence of use of the template was viewed and found to provide appropriate controls for undertaking trials and pilots. **CAR 9** is cleared.

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

SR1, raised during the initial assessment, requested the BCA to document and implement a plan to ensure the effective implementation of all procedures and systems, including the follow up of any identified issues.



The internal audit procedure and associated audit schedule was reviewed and found to be appropriate. A number of planned audits had been recently completed. A system for following up audit findings was developed and implemented during the assessment although, due to the short time frame only one example was available for review.

Some audits reviewed did not include all of the requirements of a particular regulation. This resulted in "holes" in the systems not being identified and therefore removing the possibility of the BCA addressing these issues.

A number of audits were planned for the near future although resourcing for those audits was yet to be addressed. **See CAR 5.**

A new strong recommendation, **R1**, is raised to address these issues. As a result, auditing of all procedures will be one of the areas of focus of the next assessment, where audit planning, delivery, content, records and follow up will be reviewed in depth.

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

The documented system identified internal, external accredited, external unaccredited and specialist contractors and defined the QA requirements. All except accredited external contractors were required to follow CCC's QA system; external accredited contractors were required to follow their own.

## RECOMMENDATIONS

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

**Note:** Strong recommendations relate to issues that could have been raised as Corrective Action Requests. While a formal response to any recommendation is not required, if issues raised as strong recommendations are not addressed they may be raised as CARs at the next assessment.

**All Strong Recommendations from the July Assessment have been cleared.**

**New recommendations arising from this assessment are as follows:**

- R1.** Audits were being used to provide evidence of effective implementation. While completed audits met the requirements of the regulations, not all procedures or parts of procedures had been audited. It is **strongly recommended** that audits of all policies, procedures and systems are completed according to the documented plan with any findings raised as corrective actions, and where necessary followed up to ensure that issues are resolved in a timely fashion.
- R2.** It is **strongly recommended** that the BCA continues its focus on improving the recording of appropriate reasons for processing decisions.
- R3.** The BCA indicated that it had plans to review its systems regarding specified systems, compliance schedules and CCC issue to ensure that all relevant information regarding specified systems is on the applications file when a CCC is issued. It is **strongly recommended** that the BCA has appropriate processes in place to ensure that all required information is provided before the CCC is issued, particularly regarding specified systems, and that the information provided is appropriate, complete and correct.

It is **strongly recommended** that as part of the BCA's review of its systems regarding specified systems, compliance schedules and CCC issue, that a system is implemented to ensure that the make and model (when known) of the specified system is recorded on the compliance schedule. This requirement should be clearly documented in the procedures.

- R4.** It is recommended that the Form B-617E, that has a space allowed for recording of issue resolution, with guidance notes provided, is reviewed to ensure that it continues to meet the BCA's needs as the BCA is not using a portion of the form but rather using the BCA Contractors and Consultants Register (Form B-612) under the Contractors Issue Register to monitor any issues.