

# Building Bill 2023 – Licensing Proposals

---

## Answer Sheet

June 2023



---

# 1.1 Answer Sheet – Design Institute of Australia (DIA)

## Proposals for design work

### 3.7.1.7

**Q27: Do you support the Department’s proposal to introduce licencing requirements for building designers? Why / why not?**

Yes, all professions and trades working in construction should be licenced where there is the potential for consumer harm.

**Q28: Do you recommend that the Department introduces licensing requirements for interior designers? Why / why not? If yes, please provide evidence of risks and harms caused by interior designers.**

The DIA is highly supportive of the recommendation to introduce licensing requirements for interior designers.

The current situation where qualified and experienced professionals are not entitled to lodge plans for projects they are leading is unsustainable, notwithstanding the exemption from lodging designs for projects that do not involve structural elements.

The introduction of licensing for Interior Designs would not only resolve recent impediments to the practising of their profession, but also deliver tangible benefits for consumers.

Consumers currently have no means of distinguishing between designers and decorators as there is no restriction on use of the title ‘designer’. The types of issues that can arise for consumers when they engage underqualified people include:

- unsuitable materials choices leading to reduced durability or poor performance
- items or materials being installed contrary to manufacturers instructions
- incorrect fixing
- typical use of appliances or fitout not accounted for

These problems may not be apparent from the initial appearance of a finished project but the space will not perform as should be expected for an outlay that is typically tens of thousands of dollars at minimum. It is an anomaly that projects of this value don’t have a consumer protection framework that minimises risk at the outset of the project through licensing the lead professional.

In terms of expertise, Interior Designers typically cover similar content to architects in the first two years of their degrees and then go on to specialise in specifying the details of interior spaces to suit their intended use. A project can include selecting dozens of elements that affect the experiences of users, and coordinating the work of several trades and professions.

The work of Interior Designers is analogous to a remedial consultant leading a building defect rectification project for a client. Their role is to advocate for and guide clients through an unfamiliar process, select appropriate experts and to coordinate works to maximise efficiency and deliver best value for money. Remedial consultants are not able or licensed to deliver all the works in a project, but have expertise in knowing which trades and professions are needed and how to schedule them. Likewise, an Interior Designer knows the limits of their expertise and will engage others to work with them to resolve a designed solution. One aspect of the value that a qualified Interior Designer brings to a project for a client lies in knowing how to make adjustments to their concept in light of project constraints that allows their vision to be realised.

For example, a site may have a structural element that impedes the project. An engineer might suggest a change to that structural element that is the most common or simple fix but that conflicts with the design concept. An Interior Designer has enough knowledge of standards to effectively engage with the engineer on the project vision. The engineer is then able to identify alternative fixes that satisfy both building code requirements and design requirements, resulting in a better outcome for the client.

The building reforms enacted to date are having the unintended consequence of locking many Interior Design practices that generally are small businesses (run predominantly by woman) out of a large component of work. Residential alterations and additions, retail, workplace, hospitality, general commercial and public sector projects involving coordination of services, structural changes and bathrooms and wet areas have been undertaken by qualified Interior Designers for many years. These businesses are now at risk from not being able to continue working in the same capacity and on the same scope and scale of projects as prior to the reforms.

Industry jobs that continue to be available include those in larger architectural practices. These may not suit those who have been running their own business as they don't have the flexibility that the mostly female Interior Designers need, and don't provide opportunities to use the skills they have developed through running their own businesses.

Many of the Interior Design and Interior Architecture degree courses will have to adjust their content and manage the expectations of students as it will be harder for graduates to see a future where they will be able to run their own practice unless they reduce their scope to interior decorating and styling.

Consumers are being forced to use architecture practices to meet their briefs for small scale work that previously could have been undertaken by Interior Designers which can increase their costs, and if they want the services of an Interior Designer as well, they are paying more overall for the same outcome.

Introducing licensing for Interior Designers would not restrict entry to the market of other practitioners offering different services. There is strong demand for styling work that does not require the level of skills and experience of Interior Designers that unlicensed practitioners could supply without risk.

### **Definition of Interior Design:**

- Interior Designers plan, design, detail, coordinate and supervise the construction of commercial, residential, institutional, recreational and temporary interior spaces within built environment enclosures to transform and improve their performance, experience, meaning and/or purpose in response to humans needs.

### **Tasks Include:**

- determining the objectives and constraints of the project brief by consulting and coordinating with clients, stakeholders, users and specialist consultants
- researching and analysing spatial, functional, economic, ergonomic, comfort, safety, sustainability, inclusivity and aesthetic requirements
- formulating spatial planning and design concepts that respond to the established brief
- preparing sketches, diagrams, visualisations and scaled drawings to communicate design concepts
- negotiating and coordinating design solutions with clients, architects, project managers, engineering engineers, services consultants, building owners, facility managers, suppliers, builders and construction trades
- selecting, designing, specifying, procuring and recommending appropriate materials, furniture, joinery, lighting, fixtures, fittings, equipment, soft furnishings, and artwork

- detailing and documenting new building work for construction to comply with required building codes, standards and authorities
- coordination with structural engineers and waterproofing specialists and integration of their work into the design
- Coordination and integration of with building services engineers building services including but not limited to structural, electrical, fire, mechanical, hydraulic and , security and waterproofing (designed by specialist consultants)and integration of their work into the design
- writing specifications and contract documents for use by builders and calling tenders on behalf of clients
- inspecting construction work in progress to ensure compliance with plans, specifications and quality standards
- conducting post-occupancy evaluations for quality improvement

**Q31: Could a limited registration scheme for designers deliver sufficient regulatory benefits without the increased costs of a licencing scheme?**

A limited registration scheme is likely to impose a similar administrative burden on Interior Designers as an unrestricted scheme without delivering the same benefits. The costs for government are also likely to be not sufficiently different to justify reducing the protections for consumers.