

Consultation paper

Remote Aboriginal communities plumbing scheme

September 2019

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Introduction

Background

Prior to 2000, individual Water Boards were responsible for the control of plumbing work in their service area. Under the oversight of the Water Boards, it was generally accepted practice for trained Environmental Health Workers (EHWs) to carry out minor plumbing repairs in remote Aboriginal communities. The principal aim was to protect public and environmental health on those communities by limiting the potential for people to contract communicable diseases such as gastro-enteritis, and to prevent skin and eye infections.

Following the commencement of the Plumbers Licensing and Plumbing Standards Regulations 2000 (the Plumbing Regulations), it became a requirement that all plumbing repair and maintenance work must be carried out by a licensed plumber. This applied across the entire State and meant that the kind of minor plumbing repair work previously performed by EHWs in remote Aboriginal communities could now only be performed by a licensed plumber.

In 2013/14, an independent review of Western Australia's (WA's) plumbing laws was undertaken by ACIL Allen Consulting (ACIL Allen) at the request of the then Minister for Commerce. As part of the review, ACIL Allen examined the case for reinstating the system of allowing basic plumbing repair work in remote Aboriginal communities to be carried out by suitably trained EHWs. The conclusion reached by ACIL Allen was that there was, "a strong argument in favour of allowing EHWs to perform minor plumbing works" and that "the Government should ensure that they are able to do so legally."

In 2014, the then Building Commission began work on developing a suitable scheme to implement ACIL Allen's recommendation. In February 2015, a consultation paper was published to seek stakeholder comment on the shape that such a scheme should take.

Following extensive consultation with a broad range of stakeholders, the 'Decision paper: Basic emergency plumbing work in remote Aboriginal communities'² (the 'Decision Paper') was published in August 2016 setting out the then Government's final position.

The new scheme (referred to in this paper as the 'remote Aboriginal communities plumbing scheme') came into effect on 13 December 2016 and is contained in Part 4A of the Plumbing Regulations.

Overview of the remote Aboriginal communities plumbing scheme

The remote Aboriginal communities plumbing scheme allows suitably trained EHWs, employed or engaged by an environmental health services provider, to carry out basic

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¹ Review of Plumbing Regulations in WA – ACIL Allen Consulting p. 56

² See: https://www.commerce.wa.gov.au/publications/decision-paper-basic-emergency-plumbing-work-remote-aboriginal-communities

plumbing work in eligible communities in circumstances where a plumber is unable to attend in a timely manner. The Plumbing Regulations refer to such EHWs as 'authorised workers'.

The remote Aboriginal communities plumbing scheme is designed to help prevent negative health outcomes and water wastage. The scheme incorporates a number of safeguards to ensure work is carried out to a satisfactory standard and that the inherent risks are appropriately managed.

These safeguards are:

- a) specifying clearly the limited plumbing tasks that are permitted under the remote Aboriginal communities plumbing scheme;
- b) defining who is an 'authorised worker' for the purposes of the scheme, and requiring that person to have completed prescribed training that includes some plumbing units;
- requiring authorised workers to be employed or otherwise engaged by a service provider contracted by the Department of Health to provide environmental health services; and
- d) placing reporting requirements and other specific duties on service providers.

The operation of the remote Aboriginal communities plumbing scheme

In addition to the safeguards that have been built in to the regulations governing the scheme, the Department of Mines, Industry Regulation and Safety – Building and Energy Division (Building and Energy) has a plumbing inspector based in Broome. A key role of the Broome plumbing inspector is to oversee the operation of the remote Aboriginal communities plumbing scheme and ensure that the safeguards are being complied with and that plumbing work performed by authorised workers is of a satisfactory standard.

Between December 2016 and December 2018, over 400 instances of basic plumbing work were recorded under the remote Aboriginal communities plumbing scheme. This work was performed by 15 authorised workers on behalf of four service providers across 21 remote communities.

Feedback from service providers indicates that the capacity for authorised workers to perform basic plumbing work in remote Aboriginal communities has resulted in much of this work being performed more expediently than if communities were still reliant on waiting for licensed plumbers to visit before the work could be undertaken.

In cases where an authorised worker identifies a need for plumbing work to be carried out that falls outside the scope of work he or she is permitted to undertake, the authorised worker reports back to the Department of Communities so the work can be completed by a licensed plumber through the Head Maintenance Contract (HMC).

Effect of the remote Aboriginal communities plumbing scheme

The types of hygiene-related health issues that the remote Aboriginal communities plumbing scheme seeks to help prevent include trachoma, gastro-enteritis and intestinal parasites.

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Trachoma

Trachoma is caused by a bacteria and is completely preventable provided that people have access to a continuous supply of clean water and a functioning sanitation system. Australia is the only developed country in the world where people still suffer from the impacts of trachoma, with incidences limited to remote Aboriginal communities. Left untreated, trachoma can result in scarring and blindness.

By allowing basic emergency plumbing work to be performed, the remote Aboriginal communities plumbing scheme results in improved access to a continuous water supply and provides greater opportunities to ensure facial cleanliness and maintain overall hygiene.

Gastro-enteritis

Gastro-enteritis is a leading cause of hospitalisation for children younger than two years in Australia, with rates up to 11 times higher in Aboriginal children compared to non-Aboriginal children³. Causes of gastro-enteritis include the norovirus and giardia infection. Good hygiene practices are an important way of preventing infections that result in gastro-enteritis, including washing and drying hands thoroughly after changing nappies, going to the toilet and before eating and drinking.

Intestinal parasites

The prevalence of intestinal parasites, including Giaria⁴, is higher in remote Aboriginal communities than in other areas of Western Australia. Adequate sanitation, as well as good hygiene practices, are important in helping to prevent the spread of intestinal parasites.

Integration with other health programs

The remote Aboriginal communities plumbing scheme is one component of a broad set of public health initiatives designed to improve the standard of housing and the living conditions in regional and remote Aboriginal communities. This endeavour is being led by the Department of Communities and the Department of Health through their Aboriginal Environmental Health Program.

The remote Aboriginal communities plumbing scheme integrates well with the health and hygiene programs administered under the Aboriginal Environmental Health Program. One such example is the 'Squeaky Clean Kids' program, through which free soap is offered to communities in the Kimberley, Pilbara, Mid-West and Goldfields regions.

In addition to the existing public health programs, the Department of Communities and the WA Country Health Service's Goldfields Public Health Unit are commencing a pilot of 'whole-of-community' environmental health assessments combined with house-by-house bathroom assessments in nominated 'trachoma at-risk' communities. Plumbing work

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³ See http://healthbulletin.org.au/articles/environmental-health-challenges-in-remote-aboriginal-australian-communities-clean-air-clean-water-and-safe-housing/

⁴ See https://healthinfonet.ecu.edu.au/about/news/2756/

⁵ See https://www.healthywa.wa.gov.au/News/Soap-helping-to-reduce-trachoma

identified from the assessments that cannot be completed by an authorised worker will be undertaken by a licensed plumbing contractor engaged under the HMC.

Purpose of this review

As part of the implementation of the remote Aboriginal communities plumbing scheme, the former Building Commission gave a commitment that it would review the scheme once it had been in place for at least twelve months.

This review is being carried out to meet that commitment, and focuses specifically on the following elements of the scheme:

- a) the scope of work permitted under the scheme;
- b) the prescribed qualifications for authorised workers;
- c) the process for designating a remote Aboriginal community as eligible under the scheme;
- d) the relationship between the authorised worker and the service provider; and
- e) the record-keeping requirements.

The review is also keen to assess:

- the extent to which the remote Aboriginal communities plumbing scheme is helping to deliver improved health outcomes and reduce water wastage; and
- the impact of the scheme (if any) on plumbers who are based in the regions it covers.

Stakeholder consultation

Building and Energy is interested in receiving feedback from stakeholders about their experience of the remote Aboriginal communities plumbing scheme to date, and about the issues discussed in this consultation document. Feedback may be provided in one of two ways:

- by responding to the discussion point questions in the questionnaire at Attachment A;
 or
- by sending us a written submission providing any comments you may have on the
 operation and effectiveness of the scheme, the suitability of the safeguards in place,
 and any changes you would like to see made to the scheme to ensure that it continues
 to meet its stated objectives.

Submissions can be emailed to: plumbingreview@dmirs.wa.gov.au or posted to:

Department of Mines, Industry Regulation and Safety Building and Energy Plumbing Review Team Locked Bag 100 EAST PERTH WA 6892

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Closing date for submissions is 5pm on Monday 30 September 2019.

Information provided may become public

After the consultation period concludes, all responses received may be made publicly available on the Department of Mines, Industry Regulation and Safety website. Please note that because your feedback forms part of a public consultation process, the Government may quote from your comments in future publications. If you prefer for your name to remain confidential, please indicate that in your submission. As submissions made in response to this paper will be subject to freedom of information requests, please do not include any personal or confidential information that you do not wish to become available to the public.

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Suitability of scheme safeguards

Scope of permitted work

Regulation 37 of the Plumbing Regulations sets out the scope of work permitted to be performed under the remote Aboriginal communities plumbing scheme. The scope was developed following a risk analysis of the types of basic plumbing work likely to be required in remote Aboriginal communities and a consideration of the benefits of allowing that work to be performed by EHWs. The scope of permitted work consists of the following:

- a) replacing leaking tap washers, spindles, handles and shower roses (except where additional plumbing work is required);
- b) replacing "P-Traps" and "S-Traps" in readily accessible locations, such as under sinks, basins or troughs;
- c) replacing leaking hose taps and hose tap vacuum breakers;
- d) replacing leaking cistern inlet and outlet washers and valves;
- e) capping a burst water main, damaged waste pipe or sanitary drain for the purpose of preventing a risk to human health or safety or a significant waste of water;
- f) replacing general covers (e.g. missing or broken inspection mounds, gully mounds, grates and vent cowls;
- g) clearing blocked waste pipes and drains by the use of plungers, flexible hand rods or hand-held water hoses only;
- h) unblocking toilets, showers, basins, troughs, sinks and baths by the use of plungers, flexible hand rods or hand-held water hoses only; and
- i) other plumbing work approved by the PLB⁶.

As can be seen in **Diagram 1** on page 8 below, the majority of work performed in the two years to 31 December 2018 has involved the replacement of leaking tap washers, spindles, handles and shower roses (248 times); clearing blockages (41 waste pipes and drains and 31 fixtures); replacing hose taps and vacuum breakers (50 times); and clearing blocked water pipes and drains (41 times).

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⁶ The Board has not approved any other work to date.

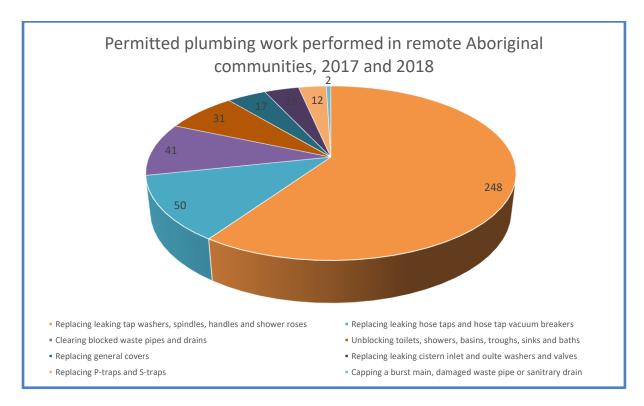


Diagram 1: Permitted plumbing work performed in remote Aboriginal communities, 2017 and 2018

Comments on the scope of permitted work

Since the commencement of the remote Aboriginal communities plumbing scheme, service providers and authorised workers have regularly provided feedback on the suitability of the scope of work in meeting the scheme's objectives.

A key aspect of that feedback has been that common causes of water wastage and slip hazards are leaking cistern stop valves, flexible connectors and flush pipe cones and rubbers. Currently, the replacement of such fittings is outside the scope of the remote Aboriginal communities plumbing scheme even though this work is included in the plumbing training undertaken by authorised workers and is considered low risk.

It has also been suggested that items (g) and (h) in the list of permitted work (see page 7 above) could be combined into a single, more streamlined item.

Comment has also been received to the effect that the use of hand-held water hoses to clear blocked waste pipes, drains or sanitary fixtures creates a backflow risk. Further risk analysis conducted by Building and Energy supports that view.

Proposal for consultation – Scope of permitted plumbing work

In light of the feedback received to date, comment is sought on a revised list of permitted work. This list is set out below and seeks to better align the scope of work with the scheme's fundamental aim of ensuring appropriate health standards and preventing water wastage in emergency situations.

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Proposed revised scope of work (items highlighted in red denote new additions, items highlighted in green denote an amended item):

- a) repairing or replacing a shower head;
- b) repairing a tap or mixer valve;
- c) replacing leaking hose taps, vacuum breakers, cistern stop taps and flexible connectors;
- d) replacing leaking cistern washers, valves and flush pipe connectors;
- e) capping a burst water main, damaged waste pipe or sanitary drain for the purpose of preventing a risk to human health and safety or a significant waste of water;
- f) replacing "P-Traps" and "S-Traps" in readily accessible locations, such as under sinks, basins or troughs;
- g) replacing general covers (e.g. missing or broken inspection mounds, gully mounds, grates and vent cowls);
- h) clearing a blocked waste pipe, drain or sanitary fixture by the use of plungers and hand held rods only; and
- i) other plumbing work approved by the Board.

Discussion – Scope of permitted work

Question 1:

Would you support a realignment of the scope of work permitted under the remote Aboriginal communities plumbing scheme as proposed above? If not, what concerns do you have with the revised definition and what changes to the proposed scope (if any) would you like to see instead?

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Proposal for consultation – Authorised workers and training requirements

Regulation 37 of the Plumbing Regulations defines an authorised worker as a person who:

- a) is employed or otherwise engaged by a service provider to provide Aboriginal environmental health services to an eligible remote community; and
- b) holds any of the following:
 - i. a Certificate II in Population Health;
 - ii. a Certificate II in Indigenous Environmental Health; or
 - iii. a qualification approved by the Board as being equivalent to the qualifications in subparagraph (i) or (ii); and
- c) has completed qualifying plumbing courses.

Environmental health training

Building and Energy has received feedback from the Department of Health that a number of individuals employed by service providers to provide Aboriginal environmental health services hold higher qualifications than the Certificate II qualifications listed above.

These include a Certificate III in Indigenous Environmental Health; diploma level qualifications; bachelor degrees; and master's degrees relevant to environmental health, health science, public health or population health.

It is therefore proposed that the list of qualifications in regulation 37(b) be expanded to include higher level qualifications relevant to environmental health, health science, public health and population health. The holders of such qualifications would also need to have successfully completed the qualifying plumbing courses prescribed in regulation 37(c) in order to be an authorised worker under the remote Aboriginal communities plumbing scheme.

Plumbing training

Regulation 37 of the Plumbing Regulations specifies the plumbing training units that an authorised worker must complete in order to become authorised to perform plumbing work under the remote Aboriginal communities plumbing scheme. The list of units differs depending on whether the authorised worker holds a Certificate II in Population Health or a Certificate II in Indigenous Environmental Health.

Since the commencement of the remote Aboriginal communities plumbing scheme in December 2016, the Certificate II in Indigenous Environmental Health has been updated such that the plumbing units from the Certificate II in Population Health are now also included as elective units in the Certificate II in Indigenous Environmental Health.

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It is therefore proposed that the qualifying plumbing units in regulation 37 be modified to include:

- a) HLTPOP0001: Provide basic repairs and maintenance to health hardware and fixtures;
- b) HLTPOP0002: Monitor and maintain sewage systems; and
- c) HLTPOP0003: Monitor and maintain water supply.

The capacity for the PLB to approve equivalent units would be retained.

Discussion – Authorised workers and training requirements

Question 2:

Do you support the proposal to expand the list of qualifications in regulation 37(b) to include higher level qualifications relevant to environmental health, health science, public health and population health? If no, please provide reasons for your view. Are there any other qualifications you consider should be added to the list of qualifications that an individual may hold in order to be considered an 'authorised worker'?

Question 3:

Do you consider that the proposed plumbing units listed above provide sufficient knowledge and skills to perform the basic plumbing work detailed in <u>Question 1</u>?

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Proposal for consultation – Definition of 'Eligible remote community'

Regulation 37 of the Plumbing Regulations defines an eligible remote community as 'an Aboriginal community listed on a website maintained by the Building Commissioner'. This list currently comprises 274 communities across WA⁷.

In the two years to 31 December 2018, basic plumbing work had been performed under the scheme in 21 of the 274 eligible communities, with the most common being Balgo (75), Jigalong (51), Djarindjin (48) and Yandeyarra (36) (see **Diagram 2** below).

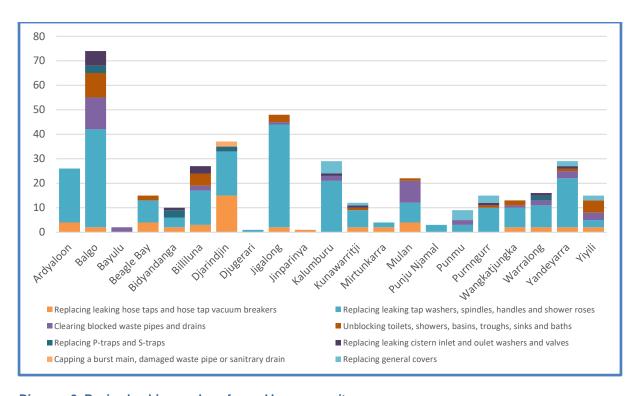


Diagram 2: Basic plumbing work performed by community

While the number of communities in which the scheme has been utilised appears low, there are valid reasons why basic plumbing work may not have been performed in a given community under the scheme, including that:

- the community has adequate access to a licensed plumbing contractor and does not therefore meet the criteria for using the scheme;
- there are only a small number of dwellings in the community and/or the community is not permanently occupied; or
- the community is not serviced by a service provider.

The rationale for deeming a community an eligible remote community was set out in Part 3.5 of the Decision Paper published by the former Building Commission in August 2016, with the

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⁷ The 'Emergency plumbing work – List of remote Aboriginal communities' is available at: https://www.commerce.wa.gov.au/publications/emergency-plumbing-work-list-eligible-remote-aboriginal-communities

main principle being that plumbing work, however minor, should be performed by licensed plumbing contractors wherever possible and should only be carried out by authorised workers when the community is so remote and/or inaccessible that a licensed plumbing contractor cannot attend soon enough.

Based on that rationale, town-based reserves were specifically excluded from the list of eligible communities.

Comments on the eligibility criteria

Building and Energy has received feedback from service providers that certain town-based reserves have difficulty in obtaining the services of licensed plumbing contractors in a timely manner despite their proximity to the town. Requests have therefore been made for those particular town-based reserves to be added to the list of eligible communities on a case-by-case basis.

In accordance with regulation 37 of the Plumbing Regulations, it is up to the Building Commissioner to determine which communities should be included on the list of eligible communities. However, there is currently no formal application process nor any approval policy in place to assist with that determination.

Building and Energy is therefore proposing to develop a process and a set of criteria for determining whether a particular community should be included (or excluded) from the list of eligible remote communities under Part 4A of the Plumbing Regulations.

It is also proposed to develop detailed application guidelines to assist community administrators, government agencies and other stakeholders to make an application for an amendment to the list of eligible communities.

Discussion – Definition of 'Eligible remote community'

Question 4:

Are you aware of any reasons preventing eligible communities from using the remote Aboriginal communities plumbing scheme? If so, what are they and what changes do you think would make the scheme more accessible for these communities?

Question 5:

What is your view on the inclusion of town-based reserves on a case-by-case basis? What criteria should town-based reserves be required to meet in order to qualify as an 'eligible remote community'?

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Proposal for consultation – Service providers

One of the safeguards built into the remote Aboriginal communities plumbing scheme is that authorised workers must be employed or engaged by a 'service provider'. Regulation 37 of the Plumbing Regulations defines a 'service provider' as a body contracted by the Department of Health to provide Aboriginal environmental health services to an eligible remote community.

To date, four service providers have engaged authorised workers to perform basic plumbing work, with over half of this work performed on behalf of Nirrumbuk Aboriginal Corporation (see **Diagram 3** below).

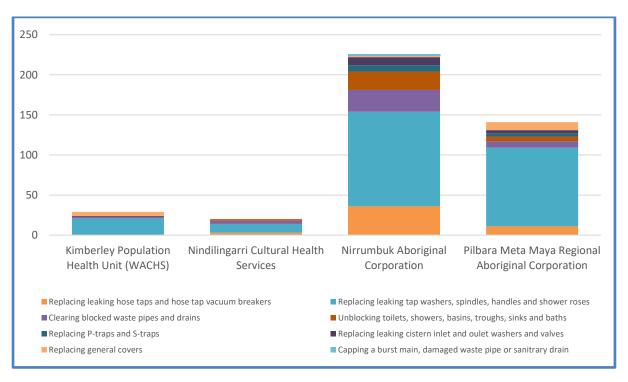


Diagram 3: Basic plumbing work by service provider

While the number of service providers engaging workers to perform basic plumbing work under the remote Aboriginal communities plumbing scheme appears low, there are likely to be a number of valid reasons for this, including:

- while 89% of remote communities are located in the Kimberley and Pilbara, more than half of the service providers operate outside this area; and
- initial difficulties in workers accessing the necessary training.

Duties of service providers

Regulation 39 of the Plumbing Regulations places a series of obligations on service providers. Non-compliance with those obligations can attract a penalty of \$1,000.

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The obligations are:

- a) ensuring that each authorised worker carries out permitted work only;
- maintaining records in the approved form⁸ and making those records available for inspection by a plumbing inspector or a licensed plumbing contractor who is performing work at the community;
- ensuring that each authorised worker has the tools, equipment, protective clothing, protective equipment and occupational safety and health training necessary to carry out the work safely; and
- d) ensuring that an authorised worker has undertaken the prescribed training before he or she conducts any work under the scheme.

Through the reporting obligations, Building and Energy has been made aware of only one instance of basic plumbing work being performed in an ineligible community, and fewer than five instances of plumbing work being performed that was outside the scope permitted under Regulation 37.

All of these instances were self-reported by the service provider involved and were suitably managed by the Broome-based plumbing inspector who provided education to both the service provider and the authorised workers involved in order to prevent future non-compliance.

Building and Energy has not received any information to suggest that any of the other service provider obligations are not operating as intended. That said, one issue that has been identified is that it is difficult for the inspector to know which authorised workers are qualified to perform plumbing work under the scheme as there is no requirement for the service provider to keep an employee register. Having such information would enable the inspector to assess compliance with the authorised worker requirements more effectively.

Regulation 25B of the Plumbing Regulations imposes record-keeping obligations on licensed plumbing contractors in relation to the work they perform. Included in these obligations is the requirement that records be kept about any tradesperson or apprentice who performs work under the general direction and control of the licensed plumbing contractor.

In light of the issue raised in relation to the remote Aboriginal communities plumbing scheme, it is proposed to place an obligation on service providers, similar to regulation 25B. This would involve a requirement that service providers must maintain a register detailing the name of each authorised worker, the qualification(s) those workers hold, the date on which the qualification was awarded and the date on which the relevant plumbing units were completed.

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⁸ Minimum information and approved form is available at: https://www.commerce.wa.gov.au/publications/record-emergency-plumbing-work-remote-aboriginal-communities

Discussion – Service providers

Question 6:

Are you aware of any reasons preventing service providers from using the remote Aboriginal communities plumbing scheme where there may be benefit to do so? If so, what are they and what changes do you think would make the scheme more accessible to these service providers?

Question 7:

Do you agree with the proposal to require service providers to keep a register of each 'authorised worker' they employ or engage to perform work under the scheme? If not, please provide your reasons.

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Impact of the scheme

Health outcomes

A fundamental objective of the remote Aboriginal communities plumbing scheme is to help improve health outcomes in remote Aboriginal communities that have difficulty accessing licensed plumbing contractors on a timely basis. This is underscored by the Department of Health, who in their online information describe the aim of the scheme as being to, 'improve living conditions in remote communities and reduce the risk of hygiene-related health issues that can arise if plumbing emergencies are left unattended for prolonged periods of time'9.

Anecdotal evidence suggests that the remote Aboriginal communities plumbing scheme has been successful in providing increased opportunity for good hygiene practices which are a key component in programs to reduce the spread of diseases. However, Building and Energy is keen to receive empirical evidence through this consultation to support that.

Water saving

Records kept by service providers show that in the two years to 31 December 2018, 124 tap washer sets and 50 hose taps were replaced under the remote Aboriginal communities plumbing scheme. This was in addition to 86 shower roses, 36 tap spindles and handles and 15 cistern inlet and outlet valves.

From discussions with service providers, it has been determined that at least some of these tap washer replacements were the result of washers that had completely worn to the point where the fixture was running continuously at full flow. Based on the maximum allowable flow rate in the Plumbing Code of Australia of 9 litres per minute, this equates to 12,960 litres per fixture for each day it remains unrepaired.

This indicates that even the repair of a small number of fixtures running continuously at full flow at an earlier time than would otherwise occur would have a significant water saving effect. Building and Energy is therefore keen to receive empirical evidence to help better determine the amount of water saved and the impact of that saving on remote Aboriginal communities.

Licensed plumbing contractors

It is acknowledged that the remote Aboriginal communities plumbing scheme has the potential to draw work away from licensed plumbing contractors, particularly those who have previously serviced remote Aboriginal communities.

The low number of complaints from plumbers since the introduction of the scheme, together with the inspection work performed by the Broome-based plumbing inspector to ensure compliance with the requirements of the scheme, suggests that the impact on plumbers has not been as significant as the industry had first feared.

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⁹ Available at: https://ww2.health.wa.gov.au/Articles/A E/Plumbing-in-Aboriginal-communities

We are therefore keen to hear from licensed plumbing contractors about their experience of the Aboriginal communities plumbing scheme to date, and the impact it has had on their business.

Discussion – Impact of the Scheme

Question 8 – Health outcomes:

Can you provide any examples of where there has been an improvement in the incidence of hygiene-related health issues that can be attributed to the introduction of the remote Aboriginal communities plumbing scheme?

Question 9 – Water saving outcomes:

Can you provide any examples or calculations showing water saved in remote Aboriginal communities as a result of the remote Aboriginal communities plumbing scheme, as well as the impact that this water saving has had on the community?

Question 10 – Impact on Licensed Plumbing Contractors:

If you are a licensed plumbing contractor in an area where the remote Aboriginal communities plumbing scheme is in operation, what has been your experience of the scheme so far? Has the scheme had any impact (positive or negative) on your business? If yes, please provide details.

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Attachment A: Questionnaire based on discussion points

Discussion – Scope of permitted work		
Question 1: Would you support a realignment of the scope of work permitted under the remote Aboriginal communities plumbing scheme as proposed? If not, what concerns do you have with the revised definition and what changes to the proposed scope would you like to see?		
Discussion – Authorised workers and training requirements		
Question 2: Do you support the proposal to expand the list of qualifications in regulation 37(b) to include higher level qualifications relevant to environmental health, health science, public health and population health? If no, please provide reasons for your view. Are there any other qualifications you consider should be added to the list of qualifications that an individual may hold in order to be considered an 'authorised worker'?		
Question 3: Do you consider that the proposed plumbing training units provide sufficient knowledge and skills to perform the basic plumbing work detailed in Question 1?		
Discussion – Eligible remote community		
Question 4: Are you aware of any reasons preventing eligible communities from using the remote Aboriginal communities plumbing scheme? If so, what are they and what changes do you think would make the scheme more accessible for these communities?	<i>y</i>	
Question 5: What is your view on the inclusion of townbased reserves on a case-by-case basis? What criteria should town-based reserves be required to meet in order to qualify as an 'eligible remote community'?		

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Discussion – Service providers Question 6: Are you aware of any reasons preventing service providers from using the remote Aboriginal communities plumbing scheme where there may be benefit to do so? If so, what are they and what changes would make the scheme more accessible to these service providers?		
Question 7: Do you agree with the proposal to require service providers to keep a register of each 'authorised worker' they employ or engage to perform work under the scheme? If not, please provide your reasons.		
Discussion – Impact of the Scheme		
Question 8: Can you provide any examples of where there has been a decrease in the incidence of health issues that can be attributed to the introduction of the remote Aboriginal communities plumbing scheme?		
Question 9: Can you provide any examples or calculations showing water saved in remote Aboriginal communities as a result of the remote Aboriginal communities plumbing scheme, as well as the impact of that water saving on the community?		
Question 10: If you are a licensed plumbing contractor in an area where the remote Aboriginal communities plumbing scheme is in operation, what has been your experience of the scheme so far? Has the scheme had any impact (positive or negative) on your business? If yes, please tell us what and how.		

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