

Q1 Do you agree that there is a lack of accountability and transparency in relation to the VRB's operations?

A1 Agree as not much is known about what goes on, the process involved and resolutions reached. Lack of transparency. Should be promoted more.

Q2 Do you agree that the composition of the Valuers Registration Board is problematic? If so, how?

A2 In part answered above. Not sure how the composition is made up or who gets appointed. There is a definite lack of transparency, and appears to be an 'old boys' network.

Q3 Do you agree with the proposal to constitute a new board which would include lay people with specialist expertise?

A3 I think the board should largely be Valuers. However some input from outside specialist may add balance. Particularly in some instances where this specialist knowledge is required, perhaps outside of the expertise of a Valuer. Very much a case by case basis.

Q4 Do you agree that it should not be mandatory for registered valuers to join NZIV or any other professional association?

A4 Yes should be mandatory. But to ONE association only.

Q5 What if any issues do you think would need to be managed if professional association membership was voluntary?

A5 Unfair on those that are members. Would erode public confidence in Valuers as it would appear that the profession is splintered. Need a strong functioning membership to give credence to the valuation profession. To be seen as an active body I think is very important.

Q6 Do you think that a tiered complaints system could deliver the benefits outlined above? If not, why not and do you have any thoughts on how else those benefits might be realised?

A6 A tiered system in my opinion would work better. Lower level complaints handled quickly and more efficiently. And transparent. The current system is too long and drawn out, too expensive. Lacks transparency.

Q7 Do you think it is possible to reduce the reliance on check valuations and, if so, how might this be done?

A7 I think lower level offending 'peer reviews', but more serious offences check valuations are necessary.

Q8 Is the range of sanctions proposed above adequate? If not, what other sanctions would be appropriate?

A8 Sanctions must be commensurate with the seriousness of the charge.

Q9 Is there a need for compliance monitoring and if so by whom?

A9 Compliance monitoring is essential. And goes back to question 4. There needs to be a healthy, active and mandatory professional body. I think the recent PINZ QAS system, has these features (inbuilt monitoring process), however this is very much implemented by individual firms and as far as I am aware not compulsory.

Q10 Do you agree with the proposal for the VRB to undertake more analysis of complaints and outcomes? Why/why not?

A10 I think that the analysis and outcomes should be published. Educational in identifying relevant issues.

Q11 Do you agree that "registered valuer" should be the only protected title? Why/why not?

A11 Strongly agree and it should be the only title referred. This is best understood by the public.

Q12 Do you think it is necessary or desirable to change the existing registration period and/or registration renewal requirements? Why/why not?

A12 Yes. I think that the APC should be issued in conjunction with CPD compliance.

Q13 If you have answered "yes" to the above question, please indicate whether you prefer one or other of the suggested approaches or another approach.

A13 As above. CPD compliance

Q14 Should CPD be mandatory? Why/why not?

A14 Yes should be mandatory. Shows commitment to ongoing education and up skilling.

Q15 Do you agree with the proposal for setting practice standards? Why/why not?

A15... If the VRB were given responsibility how would this be funded?

Q16 Do you agree with the proposal for setting ethical standards? Why/why not?

A16 Agree. However there should be greater emphasis and provision for Valuers to report unethical and incompetent Valuers to the governing body.

Q17 Do you agree that the minimum age requirement should be removed?

A17...I don't think this is an issue as it appears covered given the time required to obtain Registration.

Q18 What do you consider are the benefits and costs of implementing any or all of the proposals?

A18 Benefits would be more procedural than cost effective.

Q19 Do you think there are any aspects of the current occupational regulation scheme for valuers that impede competition in the supply of valuation services? Please specify which aspects and how they impede competition.

A19 Not aware of any aspects that may inhibit competition.

Q20 Do you think the occupational regulation of valuers should be liberalised? If so, what aspects of the scheme should be liberalised and what benefits would this have?

A20 No not at all. Any 'watering down' would be counter productive and undesirable.

Q21 Do you think the three year supervised experience period for New Zealand graduates is too long? If so, how long should the experience period be?

A21 This is interesting as I think it depends on where the graduate Valuer goes to obtain the 3 year experience. The knowledge and experience gained is very much dependant on the firm working for. A fully resourced firm, large enough and actively involved in graduates is far more preferable than one that is not. 3 years is certainly NOT too long, in some cases it may not be long enough.

Q22 Do you favour a tiered registration system that provides for provisional registration (with less experience and other requirements) as well as full registration?

A22 No as this would lead to confusion in the publics eyes. It would also add cost in administering.

Q23 Should the requirement for overseas valuers to have at least one year's practical experience in New Zealand be retained?

A23...Yes some form of practical experience. Although they may be equally well skilled and experienced, I think there needs to be time to adjust to a different country, culture, different markets, perhaps slightly different ways in doing things.



Q24 Do the existing degree courses and post-graduate training requirements provide registered valuers with the expertise required to do sum insured valuations?

A24 No

Q25 Is there a need for practice standards covering sum insured valuations?

A25 Yes. Although I think the Institute needs to become more involved in publishing costing guidelines.

Q26 Could registration requirements be reduced for some types of valuation?

A26 No not at all. I think you should be registered to perform any valuation work. Again reduces the confusion in the public's eyes, as there is still types of valuation work that does not require a registered Valuer.

Q27 Are the current registration requirements excessive for valuers who only carry out residential valuations? What would be the risks and benefits to consumers if the requirements were reduced?

A27 No not at all. I think that 3 years should be the bare minimum. If reduced erodes the public confidence. Particularly if we say we are reducing from 3 to say 2 years. If anything it should be the other way.

Q28 Are there any risks in allowing registered valuers who have not passed degree courses in valuation to do rural valuations?

A28 I can see huge risks. Specialized area.

Q29 Are the valuation qualifications offered by the accredited universities fit for specialist purposes? If not, what are the problem areas?

A29 No. Practical side of valuing very limited. Particularly building construction knowledge. This is the downside of reduced cadets going through the old VNZ or Housing Corporation. Prior to starting as a Valuer we were required to work a minimum of 3 months with a builder. The experience was immense. Something like this needs to be integrated into the course.

Perhaps this could be mandatory for first year out of Uni as part of the CPD if valuing is your chosen field. To show a period of time in a building related activity. Or as a post grad course, again, which should be required prior to registration.

Q30 Do you think any changes are required to the existing professional indemnity insurance arrangements?

A30 No as many of the lenders require certification as to the level of professional indemnity cover anyway.

Q31 If so, do you favour either of the options outlined above or have an alternative suggestion?

A31 Although perhaps beneficial to the public, firms may be reluctant to release full Insurance cover.

Other Issues

New proposals for VRB and complaints committee are discussed but silent on the subject of remuneration. Unless LINZ is expecting these positions to be filled by volunteers, members will need to have adequate compensation so there is a cost implication.

The discussion document gives no recognition to the benefits of the QAS Certification recently introduced by PINZ and how this model should impact on regulatory controls, elevation of standards, professional recognition and public confidence.



