



01/08/22

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Dear Jemma

This submission to the Queensland Department of Resources (DoR) is a joint submission on behalf of the Surveying & Spatial Sciences Institute (SSSI) and the Spatial Industries Business Association (SIBA).

We (I, Alistair Byrom) must apologise for the delay in responding to your request for input to your Discussion Paper - Modernising Survey Auditing. We were receiving responses right up to the due date and have subsequently had several verbal discussions from members of one or both organisations. Discussions have also occurred with Consulting Surveyors National on the level and content of the responses.

We directly received several responses and we were also “blind carbon copied” into several responses that were directly forwarded to the Department and numerous conversations on the matter occurred. The level of communications suggests that the subject of Survey Auditing is something that the profession is passionate about.

We would like to take this opportunity to advise that prior to the release of the Discussion Paper we had received several requests to approach DoR with regards to the profession’s dissatisfaction with the current processes and we were in the process of preparing a submission on this matter. There were two main concerns that we had been asked to address, being:

- Deposited Plans not being examined/passed as per timing expectations, noting that examination only seemed to be occurring at lodgement of the said plan
- Receiving a timely response to a request for advice on survey matters.

From the responses we received to the current consultation, it become apparent that there is a general misunderstanding of the existing “Accreditation” and “Survey Plan Auditing” process and that the current process needs to comply with existing Departmental internal policies and obligations (i.e. Survey & Mapping Infrastructure Act 2003, Public Records Act 2002, SIG/2013/504, SIG/2013/565, SIG/2021/5860 etc).



It is our understanding, in simple terms, that the Department has several responsibilities that it needs to continue to meet in relation to survey plans, their assessment and associated survey information, being:

- Assist Titles Queensland (TQ) to ensure veracity of the Registry
- Update & maintain State databases
- Update & maintain survey standards/guidelines
- Work with the profession and the Surveyors Board of Queensland (SBQ) to uphold the integrity of the cadastre.

From our review of the responses to this current call for feedback, we believe it would be advantageous for all interested parties if further consultation occurred, beginning with the Department informing the profession on the existing processes and how these processes impact DoR's business processes. It is also acknowledged that the recent creation of TQ and the introduction of "digital lodgement" has potentially added further ambiguity to the existing processes. A clearer understanding of the Department's processes may enable the profession to offer a more constructive response.

There was also a re-occurring response seeking regular reporting of statistics as to number of plans lodged/submitted, number of plans examined and under which level of examination, with these statistics being presented as both a total and broken down to number per individual examiner (anonymity preferred). There were also a re-occurring request to understand the intended future statistical breakdown of surveys/plans to be audited and over what timeframe.

It is acknowledged, as stated in the Discussion Paper, that the Department is suffering from a survey human resources issue, as is the profession as a whole and that because of this shortage a review of priorities is required. The profession would like to offer some constructive comment to how these priorities are decided and as mentioned above, having a clearer understanding of DoR's business processes would benefit any future comment and how all interested parties may benefit from the re-alignment of priorities. The profession would like to see, as a result of the re-alignment of priorities, continued examination of a sample of plans prior to lodgement for registration, an increase in availability of DoR resources to offer timely survey advice and potentially an outsourcing of Department survey tasks that may free up resources to address those tasks that cannot be outsourced.

Below we have attempted to summarise and categorise the received responses, acknowledging that you have already received several of them directly. We also acknowledge that in some instance the responses are somewhat contradictory, however we have not attempted to correct, censor or order these, neither have we attempted to make an exhaustive list of the comments received.

Positive Comments

- The discontinuation of accreditation is a positive move as all surveys will be treated equally
- The Form 13/18 should be the only certification and that accreditation is an unnecessary duplication of bureaucracy
- An increase in field audits will potentially have a positive impact of quality surveys, the introduction of Identification Surveys to the field auditing process is a positive development. However, any field audit needs to be undertaken contemporaneously with the survey it is auditing
- Ideologically the proposed approach has the potential to increase the efficiency of the registration process (it may have a detrimental effect to the post registration process, given the potential increase of post registration corrections)
- The introduction of a review/consultation process allows for the potential opportunities in the process to be considered and implemented (initiate an increase of automation/digital process etc)
- A re-alignment of priority away from Survey Auditing to providing greater assistance/advice on survey matters
- Potential elimination of plan version ambiguity (i.e. document control) due to the reduction in the number of Deposited Plans.

Negative Comments

- The timeframe for response was too short.
- The consultation process has been pre-determined, hence this is not true consultation.
- The current Plan Auditing process is not broken and does not need to be reviewed.
- Surveyors spend/spent considerable time and effort to obtain accreditation, this effort is not being recognised by the termination of the current process.
- How can undertaking 2 audits (by DoR & TQ) on separate occasions offer an increase in efficiency, multiple handling only adds inefficiencies.
- The current process if operating as originally designed allowed for the survey audit to occur concurrently with the Local Government sealing process, hence allowing any necessary amendments to be made whilst the surveyor had “control” of the survey plan. The proposed process removes this efficiency.
- Whilst the proposed process may increase the efficiencies prior registration, the number of post registration will increase and therefore introduce additional costs and inefficiencies to the process as a whole.
- DoR will need to consider the post registration process as the increased numbers of these requisitions will only increase time demands on both DoR resources and the surveyors.
- Potential increase to a surveyor’s risk profile, in that a post registration correction may increase a surveyor’s liability due to the time delay for the error to become apparent.
- Undertaking field audits depletes public perception of the work surveyors do.

- Will the audit period, as stated (every 2 years or so), act as a suitable deterrent to those that are undertaking substandard work or will it have a detrimental effect on cadastral integrity.
- How do you reconcile that at registration, by law, the new boundary is as monumented not as per the post registered corrected plan.
- How does the proposed approach impact indefeasibility of title.
- Plan examination should be a high priority of DoR.
- Plans still need to be submitted with 40 days of placing a peg, however how will these be dealt with. They can no longer be relied on by subsequent surveyors.
- Potential increase in fees (requisition) if separate requisitions are now going to occur (ie by TQ and a following requisition after registration by DoR).
- How does DoR determine which plans should be audited and how do they manage the perception of victimization.
- Backlogs and poor standards will not go away by creating a process to streamline registration.
- Corrections occurring after the fact (post registration) will create more cost, angst, lack of professional trust and a decline in a healthy industry.
- A survey should be fit for purpose, in all facets, pre-registration rather than post registration.
- It appears that the proposed process will shift a level of responsibility from DoR to SBQ, if this is in fact the case, how will SBQ address the increased demands on its resources.

Summary

Whilst the profession acknowledges there are some positives in the proposed process, these benefits are far outweighed by the perceived negatives.

We would also like to request that as part of the ongoing consultation process the Department considers a further session with the industry bodies (SBQ, SSSI/SIBA & CSN) prior to going out to the wider profession.

We support a review of the current system but would like to suggest that the current focus is too narrow, we are of the opinion that it should also consider both the post registration correction process and the automation of the existing processes.

Please don't hesitate to contact us if you would like to discuss further.

Kind regards



Alistair Byrom
Chair, SIBA|GITA