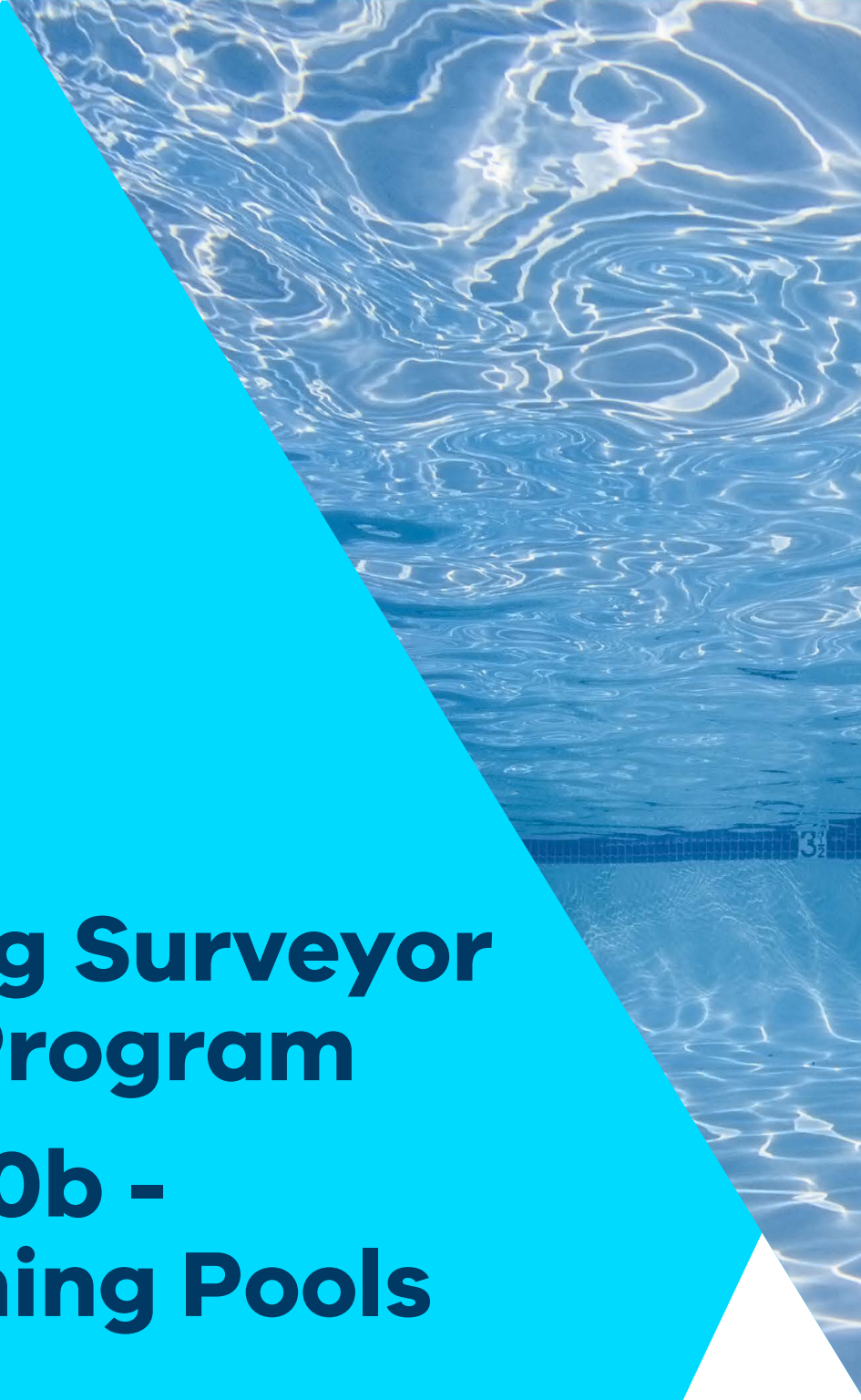
VICTORIAN BUILDING AUTHORITY



Building Surveyor Audit Program

Class 10b - Swimming Pools

January 2022 – June 2022

VICTORIA State Government

ABORIGINAL ACKNOWLEDGEMENT

The VBA respectfully acknowledges the Traditional Owners and custodians of the land and water upon which we rely. We pay our respects to their Elders past and present. We recognise and value the ongoing contribution of Aboriginal people and communities to Victorian life.

We embrace the spirit of reconciliation, working towards equality of outcomes and an equal voice.

Authorised by the
Victorian Building Authority
733 Bourke Street
Docklands VIC 3008

Available online at **www.vba.vic.gov.au**.

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ACRONYMS

RBS	Relevant Building Surveyor
DtS	Deemed-to-Satisfy
NCC	National Construction Code
NCZ	Non-Climbable Zone

1. ABOUT

The Victorian Building Authority's (VBA) Building Surveyor Audit Program (BSAP) is a regulatory initiative that seeks to identify and reduce non-compliant building work in Victoria. The program involves the desktop review of building permit and occupancy permit documentation to ensure registered building surveyors are carrying out their functions correctly. This report details the BSAP findings.

1.1 VBA Compliance and Enforcement

The Victorian Building Authority (VBA) is responsible for monitoring and enforcing compliance with the *Building Act 1993* (the Act) and associated regulations and guidelines, including the National Construction Code and Code of Conduct for Building Surveyors in Victoria.

The Act provides for plumbing and building work to be carried out so that it meets minimum standards of safety, health, and amenity. It requires people and companies undertaking building and plumbing work to be registered or licensed practitioners. It also provides for various enforcement tools to be used where individuals and companies fail to comply with the requirements of Act.

The VBA's compliance and enforcement decisions are made according to the Compliance and Enforcement Policy.

The VBA's twice-yearly Compliance and Enforcement Report is designed to give industry, practitioners, and the community an insight into the VBA's activities. To safeguard Victoria's future, the VBA is strengthening its capacity to take firm action when needed to keep Victorians safe and hold practitioners to account. As Victoria's building and plumbing regulator, the VBA'S starting point is that individuals want to do the right thing. That's why we are enhancing our risk- based regulatory model that will encourage and incentivise good behaviour, while discouraging poor performance.

1.2 Building Suveyor Audit Program Benefits

The benefit of the Building Surveyor Audit Program (BSAP) is to improve safety and compliance outcomes for building work in Victoria.

Building surveyors perform a crucial role in the building approval process to ensure we live in a safe, accessible and energy efficient built environment. The *Building Act 1993* gives building surveyors in Victoria the power to issue building permits, occupancy permits and enforce compliance with the Act, Regulations and National Construction Code.

Section 17 of the Act allows for applications for building permits to be made to a municipal building surveyor or private building surveyor appointed under Part 6 of the Act. Section 24 of the Act requires, among other things, that the relevant building surveyor refuse to issue a building permit unless he or she is satisfied that the building work and the building permit will comply with the Act and the building regulations.

As building surveyors perform a crucial role in the building approval process monitoring their compliance provides an avenue for oversight of the building industry's performance.

Information and intelligence gathered through BSAP enables the VBA to identify areas of concern warranting further investigation and possible need for improvement of industry practice and the regulatory framework.

Data from the audits is used to guide education as well as the enforcement and compliance activity.

The results of audits are communicated to practitioners. While BSAP has an educative nature, where non-compliances are identified, registered building practitioners may, among other compliance measures, be subject to enforcement action in line with the VBA's compliance and enforcement activities.

1.3 What are our powers?

Section 197 of the *Building Act 1993* (the Act) provides that it is a function of the VBA to:

(a) monitor and enforce compliance with the Act and regulations, to;

(b) supervise and monitor the conduct and ability to practice of registered building practitioners, to;

(c) provide information on matters relating to –
   i. building standards; and
   ii. the regulation of buildings, building work and building practitioners

(d) provide information and training to assist persons and bodies in carrying out functions under this Act or the regulations.

1.4 What was the scope

The practitioners and sites were selected using a risk-based selection criteria utilising data from across the VBA such as Proactive Inspections Program (PIP) results, complaints data and practitioner discipline to identify areas of high risk.

To ensure a high value audit program the audits are scoped based on risk assessment to align with a focus on known risks and the VBA Register of Harms, including:

- fires in buildings
- building collapse or structural damage
- children drowning
- threat to life and safety
- water ingress
- fit for purpose

The risk-based nature of the program, means that the audits do not assess compliance with all NCC requirements and as such the audited permit documents may have other unidentified compliance issues.

With a focus on reducing the incidence of children drowning, the scope of this audit report is Class 10b swimming pools located throughout the State for compliance against the performance requirements:

- P2.1.1 Structural stability and resistance
- P2.2.4 Drainage from swimming pools
- P2.7.1 Swimming pool access, and
- P2.7.2 Swimming pool recirculation systems of the National Construction Code (NCC) Volume 2 2019 Edition or equivalent performance requirement in other editions.

Where there was no performance solution to satisfy the performance requirement for P2.7.1 and P2.7.2 the audit was against the provisions of:

- AS1926. 1 Swimming pool safety Safety barriers for swimming pools
- AS1926.2 Swimming pool safety — Location of safety barriers for swimming pools
- (incorporating amendments 1 and 2) and
- AS1926.3 Swimming pool safety — Water recirculation systems (incorporating amendment 1).

1.5 How did we do it?

The VBA carried out desktop audits of 46 Class 10b swimming pools located within 30 municipalities in Victoria. A total of 21 building surveyors were responsible for the sites selected.

Section 30 building permit documentation was used to assess each permit for sufficiency of the information to enable the building surveyor to determine compliance, and whether compliance was achieved against Performance P2.1.1, P2.2.4, P2.7.1 and P2.7.2 of the NCC 2019, Building Code of Australia (BCA) Volume Two.

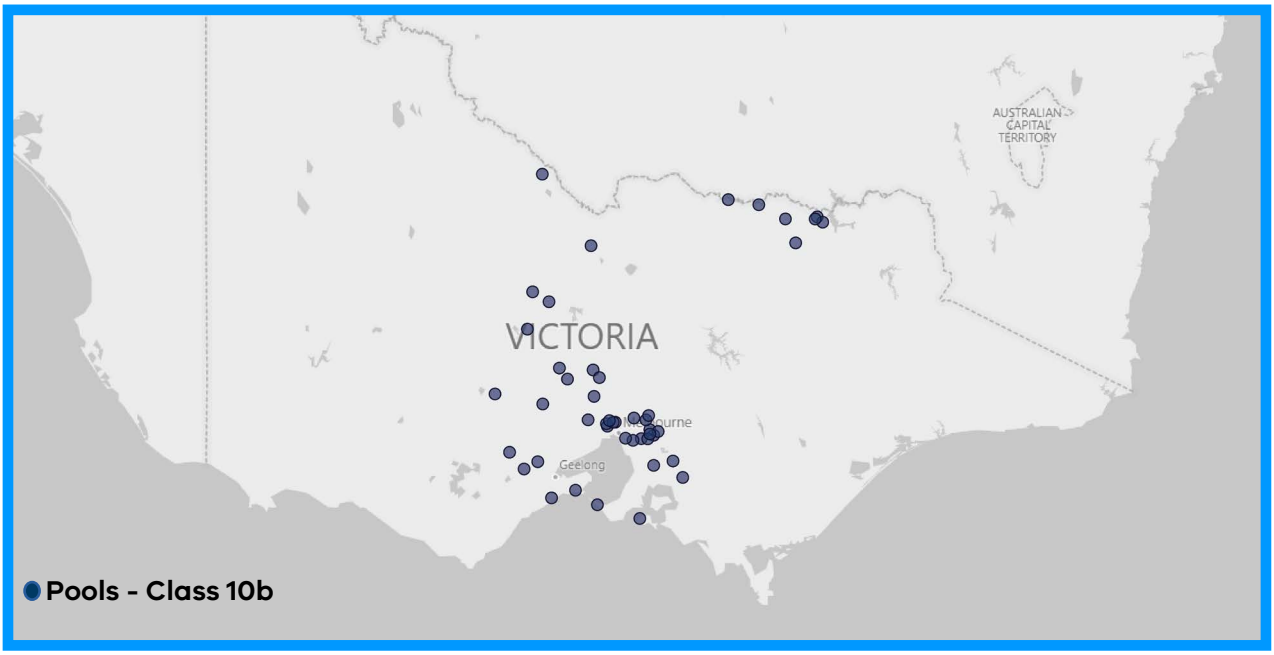

Figure 1. Audit locations in Victoria.

1.6 Action taken by the VBA

Where compliance risks were identified, the VBA sends notification to Relevant Building Surveyor (RBS). Typically, these notifications require the practitioners to:

- provide any relevant documentation (such as an approved performance solution, engineering drawings or certificate of compliance from a registered practitioner) showing how the work meets the requirements under the building legislation – this is because practitioners are currently not required to lodge this documentation with the VBA; or
- provide the VBA with proof the work has been/will be brought into compliance (e.g. amended building permit).

The RBS is expected to manage any rectification required, using their enforcement powers.

Although the program has an education focus, where serious non-compliances are identified practitioners are referred for investigation in line with the compliance and

1.7 Next steps

The next steps after publishing this report will be to use the information collected from the audits to:

- engage with industry stakeholders about causes, challenges, and ways to improve
- developing an education strategy and provide education to building practitioners
- allow for targeting of issues identified through proactive inspections and other regulatory functions
- monitor for improvement of issues identified
- advocate for legislative changes and reforms to improve regulatory process.

2. AUDIT FINDINGS

2. AUDIT FINDINGS

Forty six audits were completed on class 10b swimming pools. Two of the permits audited were for the pool barrier only. All, except one pool were an outdoor pool, 41 were inground and two permits had an above and below ground pool. There were no audits that used a performance solution for the barrier. Of the 46 audits completed, all audits had at least one item that the audit assessment was that the RBS could not have determined that compliance was achieved. This was often the result of a lack of documentation demonstrating compliance.

Sufficiency in documentation for the RBS to make a determination on compliance varied from 0 per cent for large outlet covers to 94 per cent for child resitant openable portion of window.

There were 785 instances where there was insufficient information to determine compliance. This equates to 53 per cent of applicable items assessed as having sufficient information to determine compliance.

Where there was sufficient information for the RBS to make a determination, compliance rates were high. There were a total of 896 instances in the 46 audits where there was sufficient information to determine compliance. Of these 896 instances, there were 14 non-compliances and 882 compliant items. Equating to 1.6 per cent non-compliance rate where there was sufficient information. This compares to 1.4 per cent in the 2021 calendar year. The sample size may explain the variation.

High-risk items identified as non-compliant included gates swinging inwards rather than outward, and pool equipment in Non-Climbable Zones. An inward gate swing can result in diminishing the effectiveness of preventing access to the pool area if the gate fails to latch, as it will allow for it to be pushed open rather than requiring force to pull it open. Pool equipment in non-climbable zones can reduce the effective height of the barrier and potentially allow for children to gain access to the pool area. The RBS was required to rectify the permit and verify that the as constructed barrier was compliant with the standard.

3. DOCUMENTATION INSIGHTS

Documentation insufficiencies across all audits are shown in Figure 2.

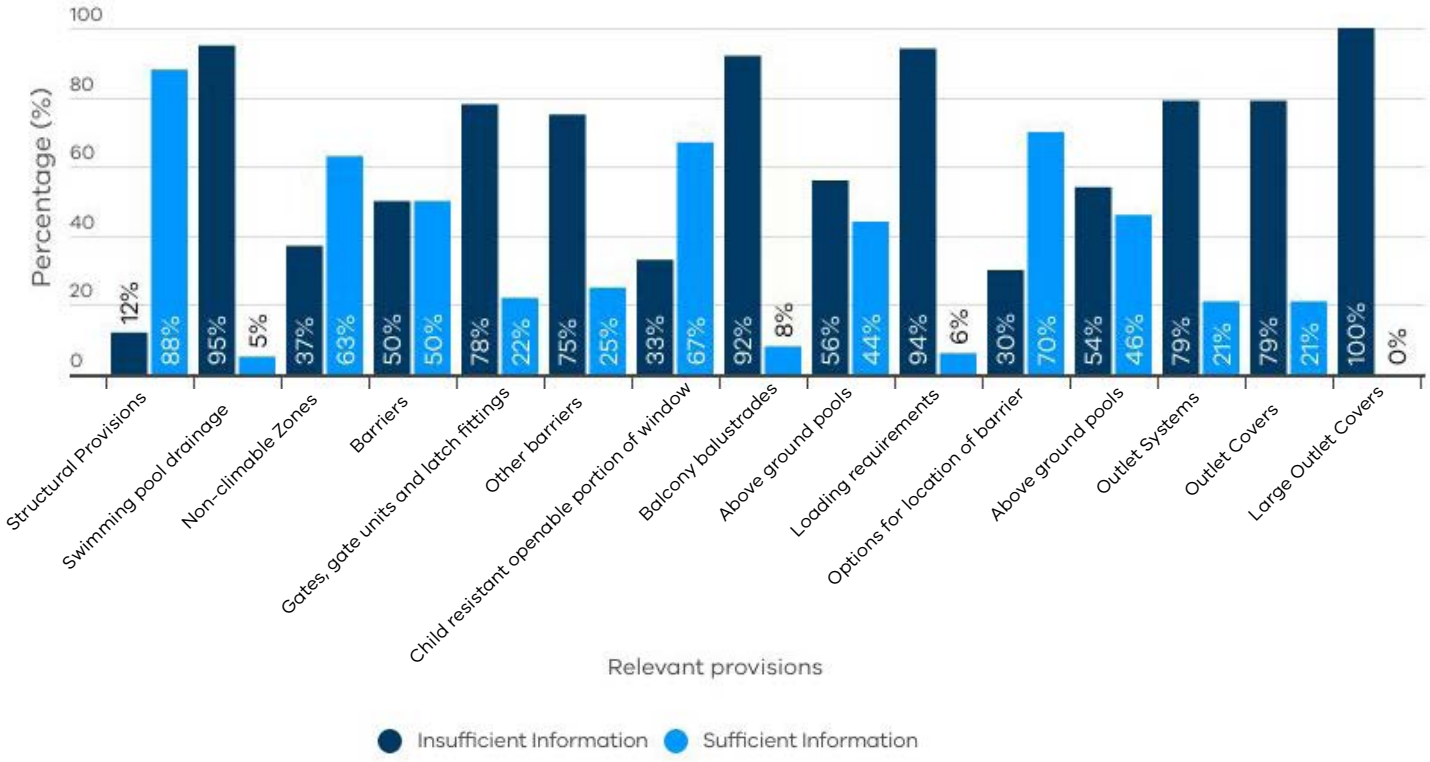

Figure 2. Documentation insufficiencies across all audits, where applicable.

4. SPECIFIC COMPLIANCE INSIGHTS

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The following sections provide details of specific non-compliances identified in the audits.

4.1 Structural Compliance

Compliance with performance requirement P2.1.1 Structural stability and resistance of NCC Volume Two was audited. Where there was no performance solution compliance was assessed against clause 3.0.2 resistance of actions, 3.0.3 determinations of individual actions and 3.0.4 determination of structural resistance of materials and forms of construction.

Key Findings:

- performance requirement P2.1.1 applied to all the audits.
- there were no performance solutions listed on the building permits or determinations under regulation 38 for a performance solution.
- most RBS relied on a compliance certificate issued under s.238 of the Act. Where these certificates had been relied on, there were issues identified with them including the certificates had expired and not being in the correct form.
- 69 per cent of the audits had sufficient information to determine compliance with these provisions. This was lower than the period of January 2021 to December 2021.
- where there was sufficient information for concrete pools to determine compliance, these were all considered compliant through engineering design and certification
- for fibreglass pools, certification had been provided in accordance with AS1838 Swimming pools - Premoulded fibre-reinforced plastics - Design and fabrication. This standard is not a referenced standard in the NCC, and a performance solution was required. There were no performance solutions to support the use of the standard.
- some audits did not have structural plans or certification for the pool.

4.2 AS1926. 1 Swimming pool safety — Safety barriers for swimming pools

4.2.1 Non-climbable Zones

Section 2.2 of AS1926.1 sets out non-climbable zones (NCZ) for barriers. Figure 3 sets out the applicability of clauses 2.2.1 to 2.2.5.

Key Findings:

- in all audits clause 2.2.1 was applicable as it sets out a general requirement for NCZ, which all barriers had at least one of.
- 45 of the barriers had at least one section of barrier which was required to comply with clause 2.2.2 as it was 1200mm high.
- 6 audits had a barrier which was 1800mm high and required to comply with clause 2.2.3.
- 22 audits had boundary barriers required to comply with clause 2.2.4.
- 12 audits had intersecting barriers requiring compliance with clause 2.2.5.

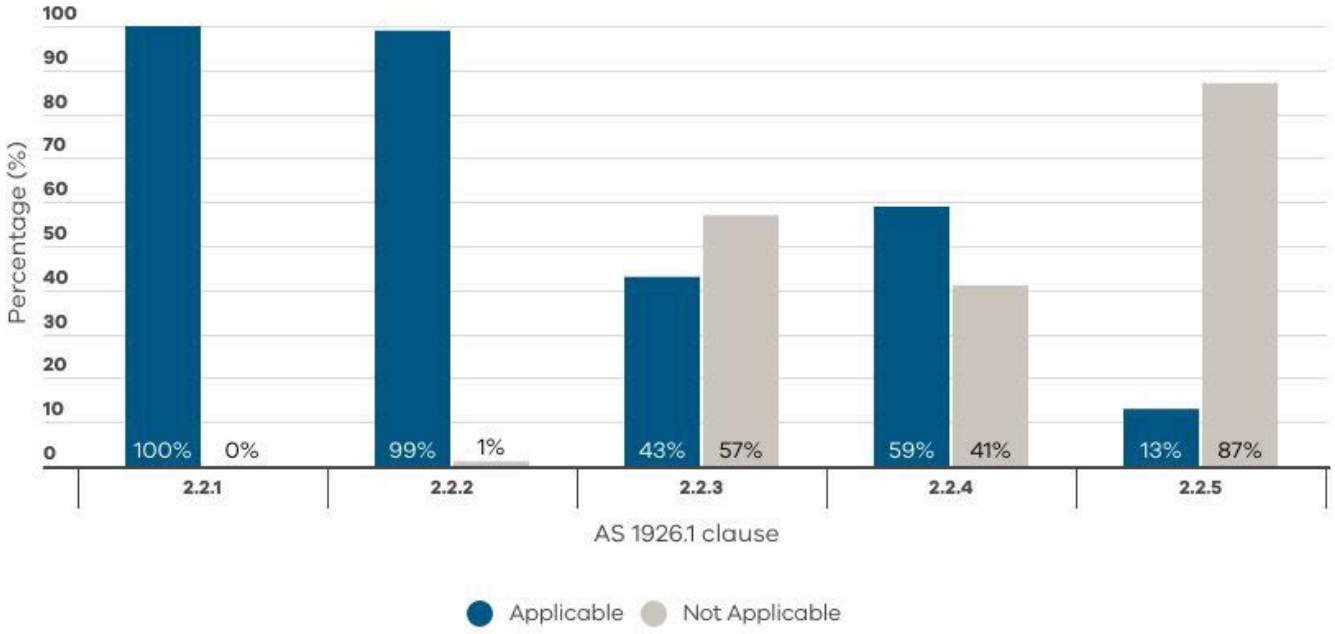

Figure 3. Applicability of clause in section 2.2 non-climbable zones.

Where a clause in section 2.2 was applicable, sufficiency of information to determine compliance for each clause ranged from 83 per cent for clause 2.2.5 to 100 per cent for clause 2.2.3 barriers not less than 1800mm in height as shown in Figure 4.

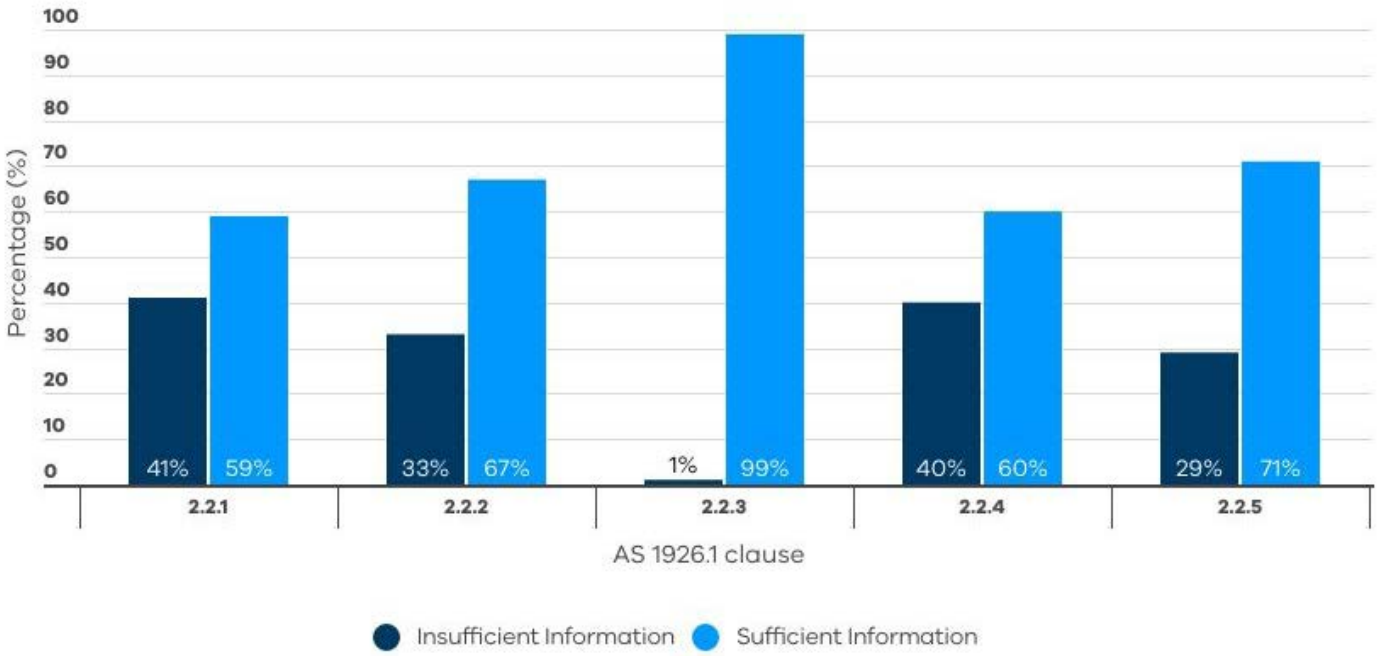

Figure 4. Sufficiency of information in section 2.2 non-climbable zones, where applicable.

Key findings for clause 2.2.1 general:

- 40 of the 41 audits where there was sufficient information to determine compliance were compliant.
- One non-compliance of plant equipment
  - » plant equipment that would facilitate climbing in the non-climbable zones.

Key findings for clause 2.2.2 barriers less 1800mm in height:

- 38 audits that had sufficient information to determine compliance with clause 2.2.2.
- all 38 showed compliance.
- the remaining 7 audits were unable to determine.
- insufficient information included the height for all, or a portion, of the barrier not being nominated.

Key findings for clause 2.2.4 Boundary barriers:

- 22 of the audits had a section of the barrier which used the boundary.
- 95 per cent of which had sufficient information to determine compliance.
- the one audit that had insufficient information was:
  - » boundary fence height not being specified.
  - » those which had sufficient information were all compliant.

Key findings for clause 2.2.5 intersecting barriers:

- there were 12 audits which had intersecting fences.
- 10 audits had sufficient information to determine compliance.
- all 10 with sufficient information were compliant.
- in those that did not show compliance the main issue was they lacked information to determine that NCZ1 and NCZ2 would be achieved when intersecting with a building.

4.2.2 Barriers

Section 2.3 of AS1926.1 sets out further requirements for the construction of barriers such as materials and where horizontals and vertical members can be located. Figure 5 shows the applicability of each clause. Where each clause was applicable, Figure 6 shows the sufficiency of information to determine compliance.

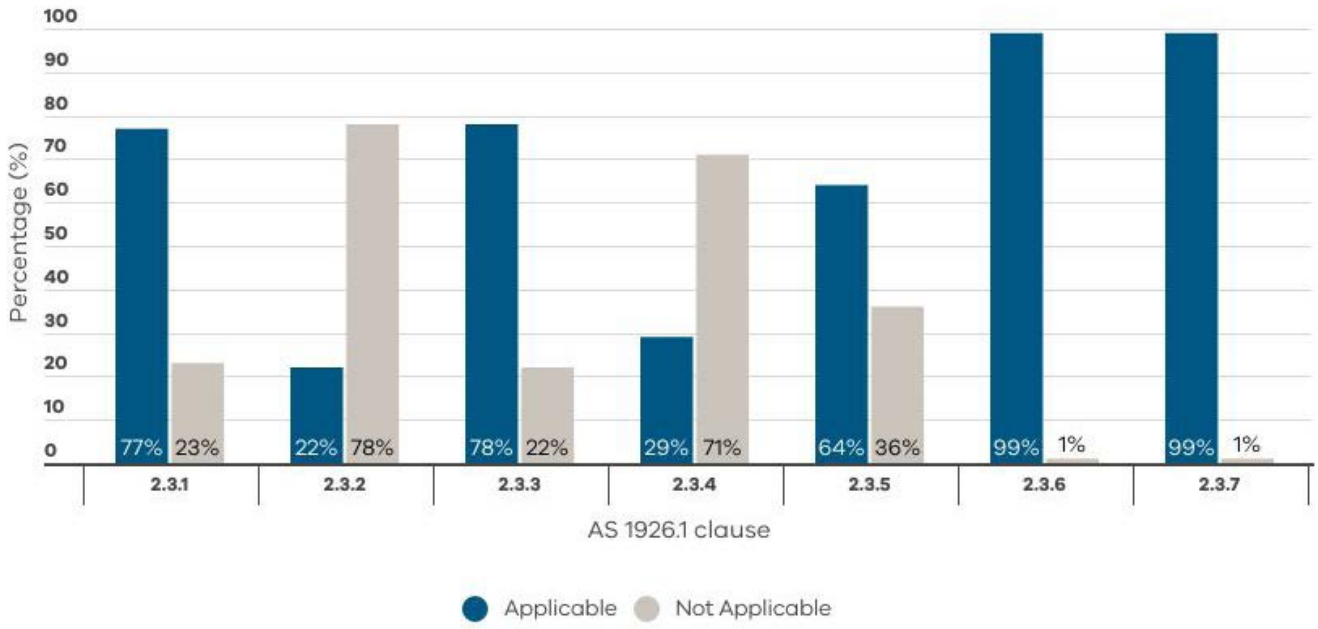

Figure 5. Applicability of clause in section 2.3 Barriers.

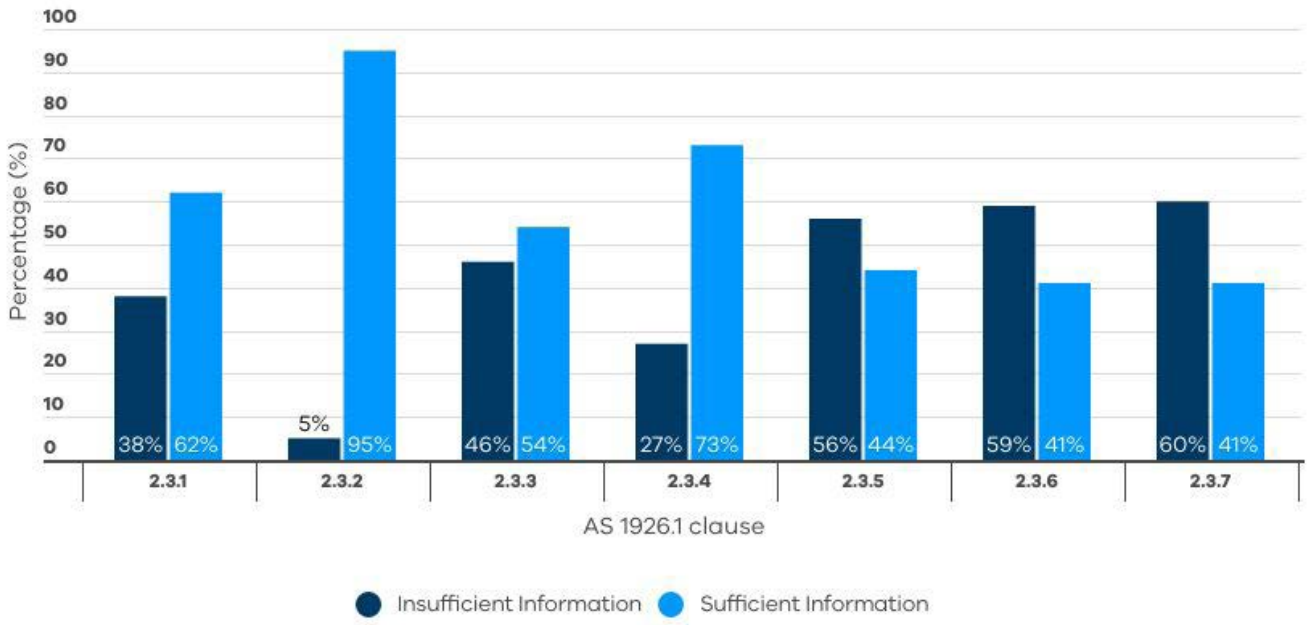

Figure 6. Sufficiency of information section 2.3 Barriers, where applicable.

Key findings clause 2.3.1 features and objects near barriers:

- where clause 2.3.1 was applicable 18 audits showed that there was sufficient clearance to steps, retaining walls or other object that may create a level change that would reduce the effective height of the barrier.
- eight did not have sufficient details to determine the level change was not located within 500mm of the barrier.
- one was non-compliant as it had a terrace area that reduced the height.

Key findings clause 2.3.2 perforated materials or mesh

- two audits had sufficient information to determine that the material would comply.
- where there was sufficient information both were determined to be compliant.
- two audits did not have the fencing material specified so it was not possible to determine if this clause was required to be complied with.

Key findings clause 2.3.3 glass barriers:

- there were 34 audits which had at least one section of glass fencing.
- only 76 per cent of the audits showed sufficient information to determine compliance with clause 2.3.3.
- missing information included:
    - no details of the fencing material to determine if the clause was applicable.
    - no information to show that the glazing was required to comply with AS1288 and.
    - where glass gates were used with a pivot style hinge that the gate dimensions complied with clause 2.3.3.

Key findings clause 2.3.4 surface projections and indentations:

- clause 2.3.4 was applicable in 17 audits.
- 14 had sufficient information to determine compliance, all of which were compliant.
- Three did not have sufficient information to show compliance. This included the material not being nominated or insufficient detailing to determine the clause had been complied with.

Key findings clause 2.3.5 horizontal components:

- 57 per cent of audits required compliance with clause 2.3.5.
- 88% had sufficient information to demonstrate compliance.
- all audits that had sufficient information were compliant.
- in those that did not have sufficient information the main issue was that the material was not specified or there was not sufficient detail to show compliance.

Key findings clause 2.3.6 vertical components:

- all audits were required to comply with clause 2.3.6 vertical components.
- all audits were compliant with this clause where there was sufficient information.
- those where it was not possible to determine compliance did not have details on the fencing.

Key findings clause 2.3.7 ground clearance:

- was deemed to be applicable in all audits.
- 91 per cent of audits had sufficient information to demonstrate compliance.
- the remaining nine per cent did not have any details which showed what the ground clearance was, or that it was to be no greater than 100mm.

4.2.3 Gates, Gate Units and Latch Fittings

Section 2.4 of AS1926.1 sets out the requirements for gates, gate units and latching fittings. These clauses include details on how the gate is to operate, the location of latches and hinges, and how the gate is constructed. Figure 7 shows the applicability of the clauses in section 2.4. Only clause 2.4.2.2 location of latch, 2.4.2.3 shielding of latch and 2.4.3 did not apply in all of the audits. Clauses 2.4.2.2 and 2.4.2.3 did not apply as the latch was located more than 1500mm above the ground and 2.4.3 did not apply due to the hinge depth being less than 10mm and outside of the NCZ.

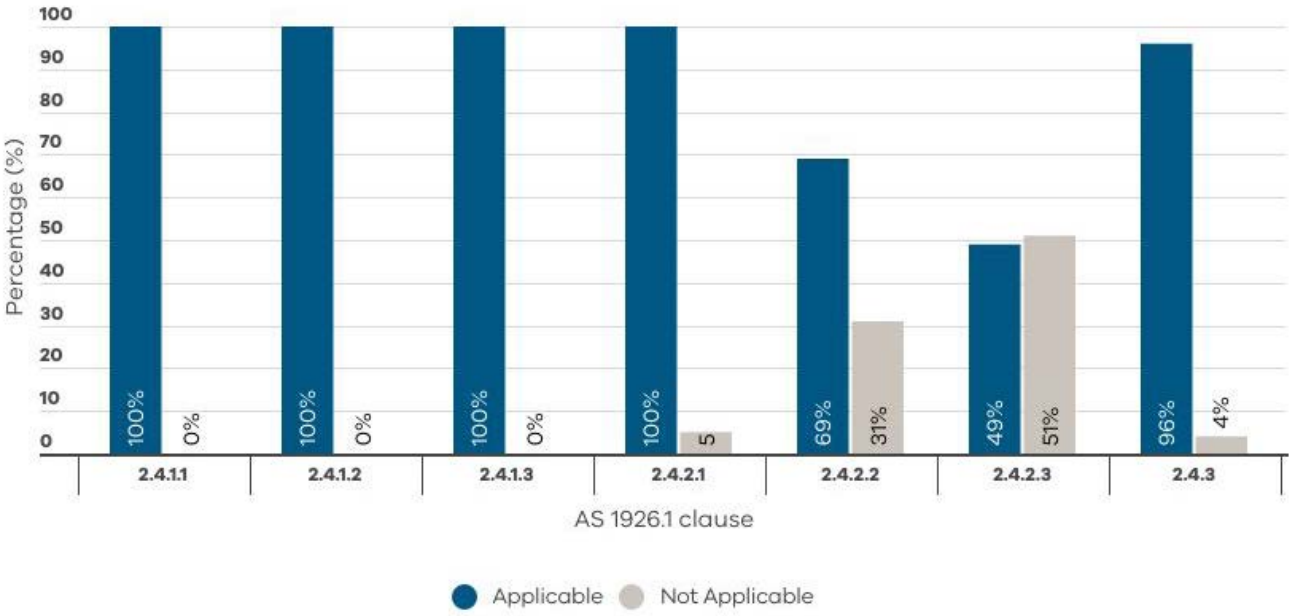

Figure 7. Applicability of clause in section 2.4 gates, gate units and latch fittings.

Figure 8 shows if sufficient information was provided to determine compliance, where a clause was applicable. Clauses 2.4.1.1 and 2.4.2.2 had the highest sufficiency of information with 87 per cent and 79 per cent respectively. The lowest sufficiency of information was for clause 2.4.1.3 and 2.4.2.1 which had 15 per cent and 50 per cent respectively.

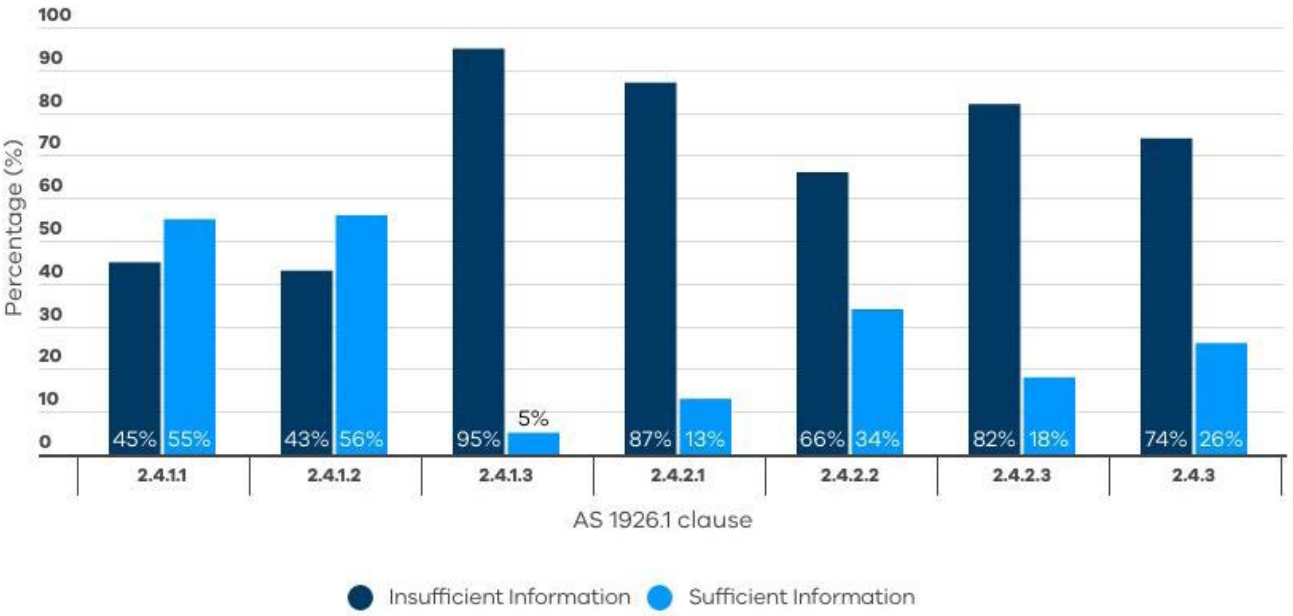

Figure 8. Sufficiency of information section 2.4 gates, gate units and latch fittings, where applicable.

Key Findings clause 2.4.1.1 operation of gates:

- 40 audits had sufficient information to determine compliance with clause 2.4.1.1.
- 40 were compliant.
- one gate was non-compliant showed the gate swinging inwards rather than outwards.
- one was non-compliant as the arc of operation was not clear of the building.
- Missing information from the plan to determine compliance included:
    - the location of the gate
    - the direction of the gate swinging and
    - whether the opening under the gate was less than 100mm.

Key findings clause 2.4.1.2 self-closing device:

- all 33 audits that had sufficient information to determine compliance with clause 2.4.1.2 were compliant.
- those that did not have sufficient information on the plans did not show details of self-closing devices.

Key findings clause 2.4.1.3 security of enclosure:

- seven of the 46 audits had sufficient information to determine compliance against clause 2.4.1.3.
- the compliant audits all had a test reports or other information to show compliance.
- the remaining audits did not have any information that would show that the gate, when hung and closed, would not have movement that would allow for the gate to come unhinged, release the latch or create a gap greater than 100mm under the gate.

Key findings clause 2.4.2.1 latch general:

- compliance with clause 2.4.2.1 was achieved in all 23 audits which had sufficient information.
- those that were compliant had a test report or other specification that the latch will operate automatically and that it cannot be kept unlocked or inadvertently adjusted through operation or without a tool.
- those with insufficient information did not have any details of the latch.

Key findings clause 2.4.2.2 location of latch:

- 39 of the audits had a latch location that was less than 1500mm above finished ground level and therefore were required to comply with clause 2.4.2.2.
- all of the audits that had sufficient information to determine compliance were compliant.
- the eight audits that did not have sufficient information did not specify the latch location.

Key findings clause 2.4.2.3 shielding of latch

Clause 2.4.2.3 provides further requirements for latches less than 1500mm above natural ground level to be provided with shielding where the gate has vertical opening less than 10mm.

- this clause was applicable to 45 per cent of the audits.
- 57 per cent had sufficient information to show how the latch was shielded, all of which were compliant.
- those that did not have sufficient information did not show the latch location or how it was shielded.

Key findings clause 2.4.3 gate hinges:

Gate hinges are required to comply with clause 2.4.3.

- 33 per cent of the audits did not have sufficient information on the gate hinges to determine compliance, mainly they did not show the gate hinges or their location.
- the 67 per cent of audits that had sufficient information were compliant as the plans showed the hinges outside the NCZ1 and NCZ2 or the hinges had the top surface sloped at 60 degrees.

4.2.4 Other Barriers

Key Findings:

- there were one audit where there was a retaining wall above the pool level.
- the audit did not have details that showed the retaining wall's height and/or the slope.
- three audits had a retaining wall below the pool level. The plans did not have sufficient information to determine if the retaining walls complied with clause 2.5.2.
- there were four pools that had out of ground walls that were utilised as part of the barrier: not .
    - » three had sufficient information to determine compliance with clause 2.5.3
    - » one was non-compliant as the landscaping reduced the height
    - » one did not have the height detailed
- there were no bodies of water used as part of the pool barriers under clause 2.5.4.

4.2.5 Child Resistant Openable Portion of Window

Key Findings:

- three audits had a window as part of the barrier.
- zero had sufficient information to determine compliance.
- they did not show that the window would be restricted using mechanical fixings that can only be removed with a tool.

4.2.6 Child Resistant Door sets

A child resistant door set is only permitted in indoor or indoor/outdoor pools.

Key Findings:

- there was one indoor or indoor/outdoor pools subject to an audit. There was insufficient information to determine that compliance had been achieved.
- no outdoor pools were proposed to have a child resistant door set as part of the barrier.

4.2.7 Balcony Balustrades

Key Findings:

- there were four audits where there was insufficient information, including setbacks from the pool barrier, to determine if the balustrade was required to comply.

4.2.8 Above Ground pools

Key Findings:

- there were three audits that the clause 2.9 applied to.
- only two of these pools had sufficient information to show compliance. Both were compliant.
- the remaining did not show the above ground portion had the required height.

4.2.9 Loading Requirements

Section 3 of AS1926.1 sets out the requirements for loading requirements for pool barriers. These requirements include:

- the strength and rigidity of openings in barriers;
- the strength and rigidity of posts and footings;
- the strength of barrier components, closing and latching of gate;
- strength and rigidity of a gate unit and;
- the durability of the gate unit.

Sufficiency of information to satisfy loading requirement clauses of Section 3 of AS1926.1 are shown in Figure 9.

Key Findings:

- for all clauses over 87 per cent of the audits, where the clauses were applicable, had insufficient information to determine compliance.
- all audits which had sufficient information to determine compliance for the clauses in section 3 of AS1926.1 were compliant.

Insufficient information included:

- not nominating the specific material and dimensions of apertures.
- not having the supporting evidence that a material complied with the testing method set out in appendix A, B, C, D and E.

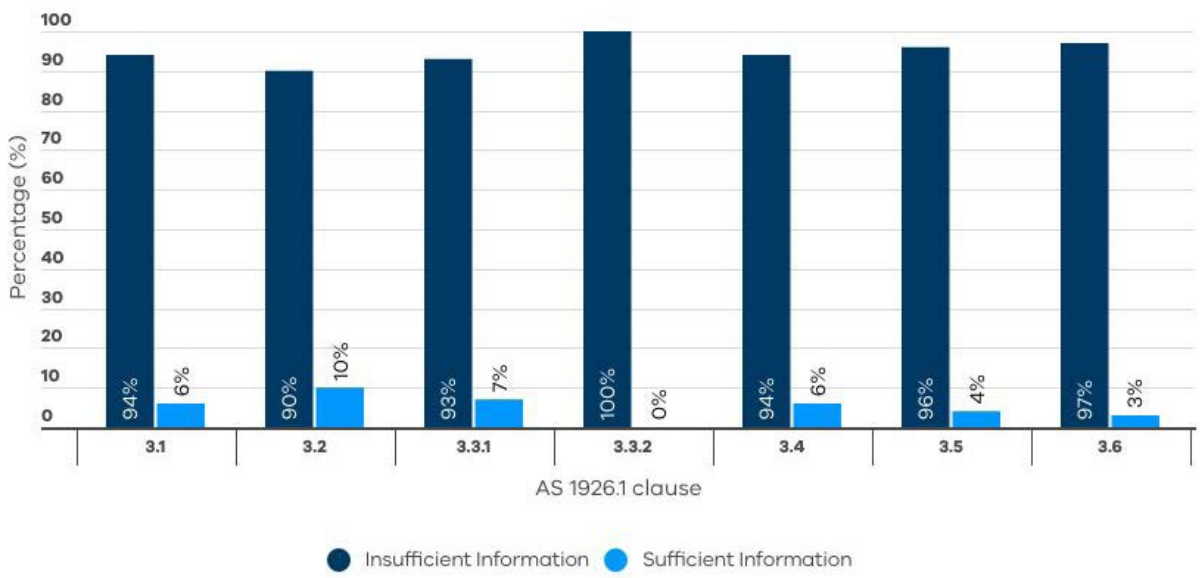

Figure 9. Sufficiency of Information loading requirements

4.3 AS1926.2 Swimming pool safety — Location of safety barriers for swimming pools

AS1926.2 is also the acceptable construction manual for compliance with the performance requirement P2.7.1 when there are no performance solutions. Clauses 4.2, 4.4.1 and 4.4.2 were assessed as part of the audits. AS1926 sets out the location for pool barriers. Clauses 4.4.1 and 4.4.2 relate to indoor and indoor/outdoor pools respectively. There was only one indoor pool in this audit. All other pools where outdoors pools required to comply with clause 4.2.

Key Findings:

- 38 audits had a balustrade in the NCZ or a wall of an existing building forming part of the barrier.

Reasons that compliance was not demonstrated included:

- no setbacks to the exiting dwelling and balconies to determine that it would not be in the NCZ.
- lack of details on the existing dwelling/ buildings to show if there were no openings in them that required protection.

4.4 P2.7.2 Swimming pool recirculation systems

Performance requirement P2.7.2 Swimming pool recirculation systems of the Volume 2 requires a swimming pool water recirculation system to incorporate safety measures to avoid entrapment of, or injury to, a person. This performance requirement can be satisfied via DtS solution by complying with AS1926.3 Swimming pool safety — Water recirculation systems. There were no regulation 38 determinations or performance solutions listed on the building permits for this performance requirement. In the absence of a performance solution compliance was assessed against the DtS requirements.

Key Findings:

- sufficient information for water recirculation systems was only provided in 72 per cent of the audits for skimmer boxes and 29 per cent for outlet systems.
- where there was sufficient information all were compliant with AS1926.3.
- as seen in Figure 10, there was insufficient information to determine compliance at least 50 per cent of the time for clauses 5.3, 6.1.2, 6.1.4, 6.1.5, 6.1.6 and 6.2 of AS1926.3 where applicable.

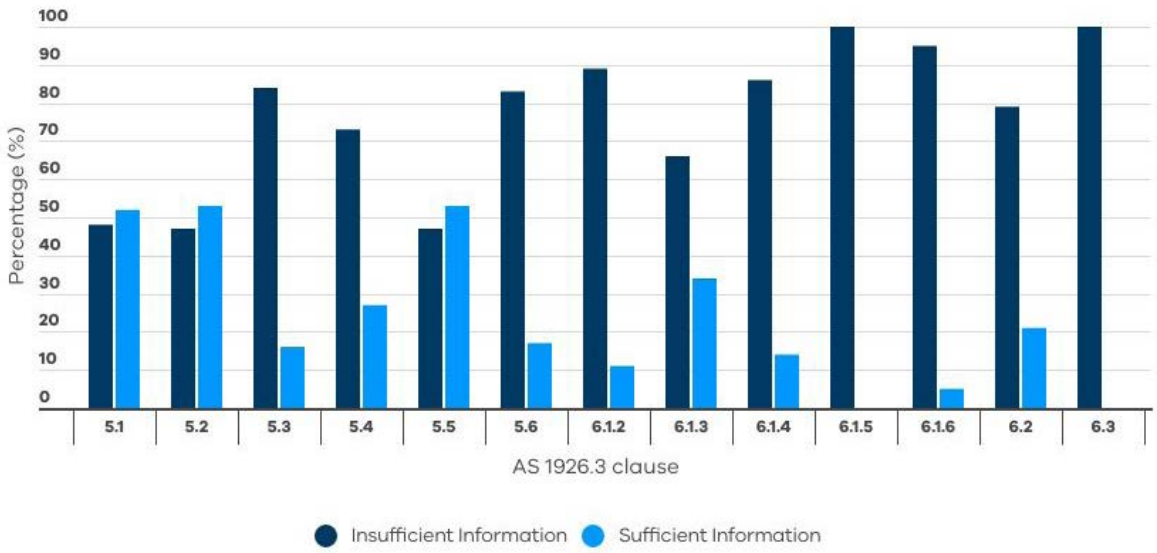

Figure 10. Sufficiency of information, where applicable.

Common trends were:

- there were no details of water reticulation devices or only a manufacturer's brochures had been provided, which did not show details of the system and how it complied.
- not having sizes of covering and openings.

4.5 Drainage from swimming pools

Performance requirement P2.2.4 Drainage from swimming pools is required to be satisfied when issuing a building permit for a swimming pool. There are no DtS provisions for this clause and a performance solution is required to satisfy the performance requirement.

- there were 43 audits which were required to meet P2.2.4.
- there were only 12 audits which had sufficient information to demonstrate that there was drainage from the pool, this was an improvement from 7 of 147% of the last period.
- drainage was through a connection to the main sewer system.
- there were no regulation 38 determinations, and no performance solution listed on the building permit.

*Its noted that 5.4 was excluded due to limited audits

5. GENERAL OBSERVATIONS

5. GENERAL OBSERVATIONS

Often the plans and specifications lacked sufficient details for the RBS to make a determination that the performance requirement had been complied with. This was caused by a lack of detailing in the plans but also by the lack of evidence of suitability to support the use of a product, form of construction or material. Part A governing requirements set out the form in which evidence of suitability is required. This can for example be in the form of a certificate, test report or another form of documentary evidence.

The audits found a heavy reliance on conditions on the building permit and the use of guides to construction or extracts from the standards. However, the plans did not specify where these requirements were required to be implemented and it was left to the builder to interpret.

Further to this, reliance on conditions where the RBS were required to provide a response to items identified by the VBA, the RBS was unable to provide documentation instead had relied on the inspector to confirm compliance had been achieved on site.

6. AUDIT CHALLENGES

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Consistent with the last report, a challenge faced during the audits was determining whether information forming part of the building permit had not been provided or that it never existed to start with. There is no requirement for the building surveyor to list the documentation they have relied on to determine compliance on the building permit. If building surveyors were required to list all the documentation that they have relied on to make a decision on the building permit it would be easier to determine if information is missing. This would also be beneficial to those on site, as they could look at the listed documentation and know if they were missing any information. This will assist in reducing the risk of onsite non-compliance from lack of access to appropriate documentation.

Furthermore, the VBA is not a central repository of information, therefore there is a reliance on all information being provided to council by the RBS and then this information being provided to the VBA. This can be overcome by the VBA being a central repository of information.

Victorian Building Authority

Online
www.vba.vic.gov.au

Email
customerservice@vba.vic.gov.au

Postal Address
PO Box 536
Melbourne VIC 3001

Telephone
1300 815 127

Opening Hours
Monday to Friday, 8:30am to 5:00pm

Registered Office
Goods Shed North
733 Bourke Street
Docklands VIC 3008