



Fair Trading NSW Proposed Guidance on CPD Implementation Domestic and Family Violence Reforms

Strata Community Association NSW Submission
15 September 2026

INTRODUCTION

1. Strata Community Association (NSW) Overview

Founded in 1980, Strata Community Association (NSW) was formerly known as the Institute of Strata Title Management. SCA NSW serves as the peak industry body for Strata and Community Title Management in New South Wales. The association proudly fulfils a dual role as both a professional institute and consumer advocate.

2. Membership

SCA NSW boasts a membership of over 3,000 members, including lot owners, suppliers, and professional strata managers who oversee, advise, and manage a combined property portfolio estimated to be worth over \$450 Billion.

3. Strata and Community Title Schemes in NSW

NSW is home to 91,346 Strata and Community Title Schemes. A significant 95 per cent of these schemes are comprised of residential lots. Altogether, the total number of Strata and Community Title lots in NSW stands at 1,073,277¹. 44% of these schemes have been registered since 2000.

4. NSW as a Leader in High-Density Living

According to the 2024 Australasian Strata Insights Report, there are 2,501,351 people residing in apartments across Australia. A majority of these apartment dwellers (51 per cent) are in NSW. ² NSW also leads the way in the trend to higher density living in Australia and boasts the highest proportion of apartment households relative to all occupied private dwellings, standing at 20 per cent.

5. Employment Impact

Strata is a significant employer, directly providing jobs to 1,259 managers throughout NSW, as well as an additional 854 other related employees. ³

6. Promoting Professionalism

1. SCA NSW is dedicated to fostering a high standard of professionalism in the strata industry with initiatives like the Professional Standards Scheme (PSS), which contributes to ensuring strong consumer outcomes for over 1 million strata residents in NSW.
2. SCA NSW membership encompasses a wide range of entities, from large corporate companies to small family businesses to dedicated volunteers. Members possess expertise in all aspects of strata management, service provision, and governance.

For further information about this consultation, please contact Andrew Jefferies, Senior Policy and Advocacy Advisor, SCA NSW. Andrew.Jefferies@strata.community

¹ Authored by Hazel Easthope, Yi Lu and Alejandra Rivera, [Australasian Strata Insights 2024](#), City Futures Research Centre, UNSW.

² Ibid, p.8-13

³ Ibid, p.8.

PROPOSED GUIDANCE ON CPD IMPLEMENTATION - INDUSTRY STAKEHOLDER FEEDBACK

Introduction

The Strata Community Association NSW (SCA NSW) is grateful for the opportunity to provide feedback about practical questions implementation challenges on CPD implementation and support for the safe participation in the compulsory Domestic and Family Violence Reforms CPD topic.

It is noted that NSW Fair Trading has developed proposed guidance on:

- Part A - Determining an agent's area or areas of practice; and
- Part B - Supporting safe participation in the compulsory Domestic and Family Violence Reforms CPD topic.

SCA (NSW) commends Fair Trading for recognising the significance of the Domestic and Family Violence Reforms CPD topic and notes its consideration that the topic may be triggering for some participants and has sought provider feedback on a proposed learning approach.

Earlier this year, SCA (NSW) provided feedback to NSW Fair Trading on the compulsory CPD topics for Strata Managing Agents and understands that the existing CPD framework (including those for Class 1 License holders) such as mandatory topics, learning outcomes and minimum-hour requirements remain unchanged. Topics and outlines are approved by the Strata and Property Services Commissioner, each year.

SCA (NSW)'s response, outlined below, offers in principle support across Part A and Part B of the proposed guidance.

SCA NSW's Response

PART A – Determining Areas of Practice

SCA (NSW) Feedback:

- Confirms an LIC is **not** required to complete CPD for every function they supervise, only those they personally practice. We believe this is the right outcome for group structures where one LIC sits over strata, property management, and sales entities.
- Self-assessment by the individual, reviewed by the LIC as part of existing supervision, is proportionate and slots into the current Supervision Guidelines and agency training plan rather than creating a new process.
- Example 3 (isolated assistance does not create a new area of practice) is pragmatic and reflects how mixed and regional offices actually operate.
- **No strata content at all.** All four worked examples are real estate. Strata managing agents hold a distinct licence category with their own CPD stream, and the guidance never says how "area of practice" maps to licence categories. Members will read it and could be unsure whether it applies to them.
- **"Personally, provides services" is undefined for a strata LIC.** In strata the agent of record is the corporation; the LIC signs agency agreements and s 184 certificates, supervises the trust account and carries the statutory responsibility for every scheme without managing a portfolio. The guidance should state expressly that this is practising strata management (the LIC completes strata CPD) and, conversely, that a group LIC who also holds a real estate licence but has no personal sales or PM role is not captured for those areas.
- **"How they hold themselves out" invites narrowing.** An agent can describe themselves narrowly to minimise CPD. "Occasional" has no threshold. Objective indicators are needed — e.g., any recurring activity, any activity for which the agent is remunerated, or any activity where the agent is named on an agency agreement or listing in the CPD year, is an area of practice.
- **Recording is optional, so it is unenforceable.** The training plan "may be used" to record the determination. It should be a required entry under the Supervision Guidelines so that the LIC's review is auditable at inspection.

- **Timing.** The 2026–27 CPD year began on 23 March; this guidance lands six months in. Fair Trading should confirm that agents who made a reasonable, good-faith determination (or completed CPD on a broader basis) before publication are compliant for 2026–27.
- **Certificate of registration holders.** The guidance refers only to "agents" and the LIC. It should confirm it applies equally to assistant agents and that their determinations sit within the LIC's review.

SCA (NSW) Recommendations:

1. Add a licence-category statement and at least two strata examples — an LIC of a strata firm inside a mixed property group, and a strata manager holding a dormant real estate licence;
2. Better define "personally provides services" to include LIC statutory functions;
3. Replace the hold-out test with objective indicators and a stated threshold for occasional work;
4. Make the training plan record mandatory; and
5. Publish a transitional statement for 2026–27.

PART B – Domestic and Family Violence Reforms

SCA (NSW) Feedback and Recommendations:

The topic is compulsory for residential property managers only and is not in the strata stream, so SCA (NSW) member courses are unaffected. The issue is live for SCA (NSW) as an approved provider, for members in mixed practices and dual-licence roles, and for the sector-wide precedent this sets for handling sensitive compulsory content.

- Domestic and family violence is not just physical – it can also be defined as emotional, financial, spiritual, social, legal, and reproductive and can also include stalking and neglect.
- As strata managers, issuing debt recovery or legal action against a lot owner can become a major source of family violence. The majority of family breakdowns are financial stress, leading to additional strain on relationships, resentment and separation bankruptcy.
- Providers refer, they do not assess. Keeping eligibility decisions with Fair Trading, with no disclosure to the provider and no requirement to recount lived experience, is

the correct trauma-informed design and protects providers from an assessment they are not equipped to make.

- **The adjustment menu** (private completion, breaks, individual rather than group activities, advance content warnings) is practical and preserves learning outcomes.
- **Exemption mechanics are unstated** - If an exemption is granted, are the hours reduced or is a substitute topic required? What will the provider's completion record show, and how does the agent evidence compliance at renewal without disclosing why? Recommend a written decision the agent can make, and a substitute elective so the hours arithmetic still works.
- **The pathway is a shared team inbox** - Applications marked "Confidential" to a generic mailbox is a weak privacy control for this subject matter. Recommend a dedicated, access-restricted form or mailbox, a published decision timeframe (e.g., 10 business days) and a firm lodgement cut-off well before 22 March, since late-year applications will otherwise bunch up.
- **The "course integrity" line will generate case-by-case referrals** - For courses approved as interactive, private self-paced completion is the most protective adjustment but would breach the approved delivery model, so every such request goes to Fair Trading. Recommend a standing approval: any provider approved for the topic may offer a private self-paced completion to a participant who requests it, without individual sign-off.
- **Provider readiness is left to each provider** – Provision of a short facilitator guide, standard advance-warning wording, a distress-response protocol, and referral information (e.g., 1800RESPECT), so delivery is consistent across providers.
- **Make the privacy line a bright line.** "Not required to provide detailed personal information" should become "no reason is required" for an adjustment request.

SCA (NSW) further recommends:

1. Encourage Fair Trading NSW to consider a standard template when issuing debt recovery notices – the present payment plan process fails when owners fail respond to this offer
2. Broaden the topic to be included in future CPD programs for strata management

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