

Consultation Summary Report

Advisory Task Force on Corporate Practice

Advisory Task Force on Corporate Practice:

Mike Currie, P.Eng., FEC (Chair)

Patricia Chong, P.Eng.

David Chwacklinski, P.Eng., FEC

Dr. Michael Davies, P.Eng./P.Geo.

Catherine Fritter, P.Eng.

Kathy Groves, P.Eng.

Adrian Gygax, P.Eng., Struct.Eng.

Scott Martin, P.Eng.

David Melville, P.Geo.

Andy Mill, P. Eng., Struct.Eng., FEC

Ed Miska, P.Eng.

Dirk Nyland, P.Eng.

Julius Pataky, P.Eng.

Gregory Scott, P.Eng.

Colin Smith, P.Eng., FEC, FGC (Hon.)

John Turner, P.Ag. (Ret.)

Selena Wilson, P.Eng.

Prepared for: APEGBC Members and Stakeholders

Prepared by: APEGBC Advisory Task Force on Corporate Practice

Version date: March 10, 2017

Advisory Task Force on Corporate Practice Consultation Summary Report

Executive Summary

The Association of Professional Engineers and Geoscientists of British Columbia (APEGBC) is the regulatory body that oversees the practice of professional engineering and geoscience in BC. In the fall of 2015, APEGBC's Council established an advisory task force of APEGBC members representing a broad range of disciplines, organizations, and industries to lead an examination of corporate practice and corporate regulation. As part of their examination, APEGBC's Council asked the task force to make a recommendation on whether APEGBC should pursue regulatory authority over corporate practice and if so, to define the types of organizations that should be subject to regulation.

Over the last year, APEGBC and the task force has engaged in a thorough consultation with members and stakeholders on the topic of corporate practice and corporate regulation. This report outlines the consultation activities that took place and summarizes what was heard. Key topics of discussion and feedback are summarized in this Executive Summary and details can be found in the body of the report and appendices.

Key Topic #1: Why Corporate Regulation? The task force heard a range of opinions from members and stakeholders on whether APEGBC regulatory oversight over engineering and geoscience organizations (referred to as 'corporate regulation' for short) is needed to sufficiently fulfil the duty of engineers and geoscientists to uphold and protect the public interest with respect to the practice of the professions. Members that did see a need for corporate regulation indicated that organizations have an influence on the practice of the professions and therefore regulatory oversight is needed to encourage positive organizational behaviour and discourage negative behaviour. Members that did not see the need for corporate regulation tended to view corporate regulation as redundant with the existing regulation of individual professionals and saw the existing regulatory system as sufficient. In a Fall 2016 survey of members, out of a total of 1,299 survey respondents¹, 67% indicated that there is an organizational influence on their practice and 27% indicated that there is no organizational influence (6% selected 'other').

Key Topic #2: Benefits of Corporate Regulation. Through surveys, emails, and consultation events, members and stakeholders weighed in on corporate regulation. Some of the potential benefits that were highlighted the most frequently included:

- corporate regulation could address current issues with the practice of engineering and geoscience in BC that have implications for public protection;
- corporate regulation could increase public and government confidence in the professions by strengthening the self-regulatory system;
- corporate regulation could bring greater awareness and support from employers for the responsibilities of professionals; and,
- corporate regulation could increase the value of the APEGBC regulatory system to individual professionals.

¹ Note that not all respondents reply to every question, so the total number of respondents for each question can be lower than the total number of respondents for the survey.

Key Topic #3: Concerns with Corporate Regulation. Some of the concerns with corporate regulation that were highlighted most frequently included:

- corporate regulation may not be effective in enhancing public protection (due to challenges with enforcing regulatory requirements);
- cost and effort for compliance—especially for small companies/sole-practitioners and organizations practising in multiple jurisdictions;
- corporate regulation may not add additional value to the practice of the professions;
- corporate regulation could dilute individual professional responsibility; and,
- lack of confidence in APEGBC’s ability to administer corporate regulation effectively.

Key Topic #4: Regulatory Coverage. In consultation materials and events, the task force outlined the full range of organizations that practise engineering and geoscience in BC and invited feedback from members and stakeholders on which types of organizations should be covered by a regulation if corporate regulation is pursued. In the fall 2016 survey of APEGBC members, out of 1,300 respondents:

- 71% agreed that **consulting firms** should be covered by a corporate regulation administered by APEGBC;
- 59% agreed that *all* **public sector organizations** that practise engineering and geoscience should be covered, while 16% thought *some* public sector organizations should be covered;
- 42% agreed that *all* **organizations that practise solely for internal consumption purposes** should be covered, while 17% thought *some* of these organizations should be covered;
- 51% indicated that they do not think **sole-practitioners** should be covered by corporate regulation.

Key Topic #5: Regulatory Model. In consultation materials and events, the task force discussed that realizing the potential benefits of corporate regulation and addressing concerns is dependent on the design of a corporate regulatory model—e.g., the regulatory requirements, and how these requirements are enforced. Reoccurring advice and suggestions from members and stakeholders on the development and implementation of a corporate regulatory model for engineering and geoscience organizations included:

- regulatory model must add value to the practice of the professions;
- minimize additional fees and administrative effort for small organizations and sole-practitioners;
- strong enforcement mechanisms are needed (e.g., protection or support for whistleblowers);
- minimize impact to APEGBC existing Organizational Quality Management (OQM) Program (a voluntary certification program for engineering and geoscience organizations);
- use OQM to inform the development of a corporate regulatory model (e.g., consider if all or a subset of OQM certification requirements could be used as regulatory requirements);
- implement a cost-recovery model for corporate regulation (e.g. the one used in the OQM Program); and,
- unify corporate regulatory systems for engineering and geoscience across Canadian jurisdictions.

The task force is now in the process of reviewing and discussing the consultation results and formulating their recommendations to APEGBC’s Council. A final report with the task force’s recommendations will be submitted to APEGBC’s Council in the spring of 2017.

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report**

Table of Contents

1.	Introduction.....	1
2.	Consultation Activities	1
3.	What We Heard	3
3.1	Why Corporate Regulation?.....	3
3.2	Key Benefits	7
3.3	Key Concerns.....	9
3.4	Regulatory Coverage	10
3.5	Corporate Regulatory Models	12
4.	Next Steps	14
	Appendices	14

APEGBC and the Advisory Task Force on Corporate Practice Consultation Summary Report

1. Introduction

The Association of Professional Engineers and Geoscientists of British Columbia (APEGBC) is the regulatory body that oversees the practice of professional engineering and geoscience in the province of BC. It is the duty of APEGBC to uphold and protect the public interest respecting the practice of professional engineering and the practice of professional geoscience ([Engineers and Geoscientists Act](#), Section 4.1 (1)(a)). In the fall of 2015, APEGBC's Council established an advisory task force of APEGBC members representing a broad range of disciplines, organizations, and industries to lead an examination of corporate practice and corporate regulation. As part of their examination, APEGBC's Council asked the task force to make a recommendation on whether APEGBC should pursue regulatory authority over corporate practice and if so, to define the types of organizations that should be subject to regulation.

Over the last year, APEGBC and the task force have engaged in a thorough consultation with members and stakeholders on the topic of corporate practice and corporate regulation. This report outlines the consultation activities that took place and summarizes what was heard. The task force is now in the process of reviewing and discussing the consultation results and formulating their recommendations to APEGBC's Council. A final report with the task force's recommendations will be submitted to APEGBC's Council in the spring of 2017.

What is Corporate Practice and Corporate Regulation?

The term **corporate** in this document and initiative is used in a broad sense to refer to *all organizations* in both the private and public sectors, including any type of legal entity formed for business purposes (e.g., corporations, partnerships, sole proprietorships) and any type of public entity (e.g., municipalities, crown corporations, ministries). The term **corporate practice** refers to the provision of engineering or geoscience services and products by organizations. The term **corporate regulation** refers to the licensing and regulation of organizations authorized under legislation.

Corporate regulation would likely involve the prohibition of organizations practising engineering and geoscience unless they have a licence from a regulating authority (e.g., APEGBC), or are a type of organization that is not required to have a licence. For most jurisdictions in Canada, such licences mean that regulated organizations need to comply with the engineering or geoscience legislation of the jurisdiction and the Code of Ethics and bylaws issued by the regulating authority. Across jurisdictions, there are also a variety of other requirements and responsibilities of licence holders (for more information, see the task force's Discussion Paper).

2. Consultation Activities

Consultation was conducted in two stages (Figure 1). Stage 1 (June to August 2016) focused on early input from members and stakeholders to understand the issues and help guide the development and assessment of different regulatory models to explore during the review. Stage 2 (October 2016 to February 2017) focused on more detailed input from members and

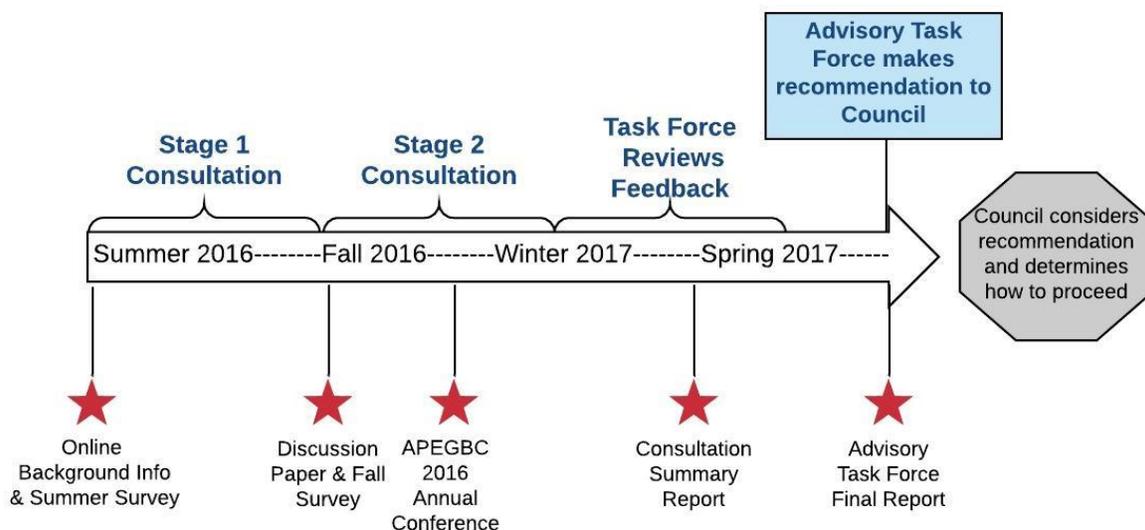
stakeholders on their preferences for non-regulatory and regulatory options for corporate oversight.

During the stage 1 consultation period, updates and background information on the Corporate Practice Review were made available on APEGBC’s Corporate Practice website and in APEGBC’s Enews. The task force solicited members and stakeholders for feedback on the potential benefits and challenges associated with corporate regulation through an online survey, which ran from July 6, 2016 to Aug. 31, 2016. As this was an initial survey to inform and shape future task force and engagement activities, the survey had a more limited promotion and received 312 respondents. The survey was promoted through two editions of APEGBC’s Enews and direct emails to top employers of engineers and geoscientists. During Stage 1, the task force also interviewed representatives of engineering and geoscience regulatory associations across Canada to learn about the corporate regulatory models that are operating in other provinces and territories. In addition, the task force received information from APEGBC on their voluntary certification program for engineering and geoscience organizations, the Organizational Quality Management (OQM) Program.

To kick-off the stage 2 consultation period, the task force published a discussion paper and held a webinar to summarize their learnings and discussions to date and outline options for the potential regulation of engineering and geoscience organizations. The discussion paper was paired with an online survey to get feedback from membership on key questions regarding corporate practice and corporate regulation. The survey was open from Sept. 26 to Nov. 30, 2016 and was promoted through consultation presentations, APEGBC publications, social media, direct correspondence to key stakeholders, and two direct emails to membership. The survey received 1,307 respondents. In addition to the online survey, members provided feedback through direct correspondence, in-person consultation events at the 2016 Annual Conference in Victoria and branch meetings held across the province.

A detailed list of consultation activities can be found in Appendix 1.

Figure 1: Consultation Timeline



3. What We Heard

The following sections provide a summary of what was heard on key topics within the consultation process, including:

- the reasons APEGBC is considering seeking regulatory oversight over organizations that practise engineering and geoscience;
- the key benefits and concerns with corporate regulation;
- what types of organizations should be covered; and
- the advantages and disadvantages of different corporate regulatory models.

More detailed information on survey results and written comments received via email can be found in the appendices to this report.

To summarize what was heard during this consultation process, an independent consultant provided support to the task force. The feedback was first organized according to the topic (e.g., key benefits, key concerns etc.). Within each topic, the feedback was analysed to identify the range of opinions on an issue and recurring themes. Where helpful, direct quotes have been included in this report to illustrate a common theme. These quotes were chosen because they provide a well-articulated representation of a common theme.

The survey results presented in the following sections represent anonymous feedback from APEGBC members. The survey software is able to check if multiple survey responses are submitted through the same IP address; while it is difficult to say with 100% certainty that no duplicate surveys were received, there is no indication that any member submitted multiple survey responses. It should be noted that not all respondents replied to every question, so the total number of respondents for each question can be lower than the total number of respondents for the survey.

3.1 Why Corporate Regulation?

Key discussions within the task force and throughout the consultation were: does APEGBC need regulatory oversight over corporate practice to sufficiently fulfil its duty to uphold and protect the public interest? And, what problem, specifically, would corporate regulation fix?

Members weighed in on these questions through written comments in emails and surveys and live discussions at consultation events with two diverging perspectives emerging: one clearly seeing the need for APEGBC regulatory authority over corporate practice, and the other questioning its necessity.

Members who did not see the need for corporate regulation tended to view corporate regulation as redundant with the existing regulation of individual professionals, and saw the existing regulatory system as sufficient for protecting public interest with respect to the practice of the professions. Some members holding this view acknowledged that there is an organizational influence on individual practice, but that it is the duty of individual professionals to ensure that professional standards are not compromised because of organizational interests/pressures. As well, some members emphasized that based on their experience they did not see a problem or regulatory gap that would be fixed with corporate regulation. Rather, any problems with not

complying with the APEGBC Code of Ethics and Bylaws could be addressed through the existing regulatory system of individual professionals and therefore APEGBC should focus on improving this regulatory system instead of pursuing a new regulatory system.

Members who did see a need for corporate regulation indicated that organizations have an influence on the practice of the professions and therefore regulatory oversight is needed to encourage positive behaviour and discourage negative behaviour. An email received from one such member is included in the text box below and is illustrative of this viewpoint.²

Email from a member regarding Corporate Practice Review
Received: September, 2016

Broadly, there are two major concerns—pressure placed on employees to act unprofessionally and unprofessional behaviour by organizations practising engineering.

Pressure on employees

Employers can (and sometimes do) put pressure on registered engineers to approve (seal, sign) designs and documents which the engineer may consider inappropriate, inferior or even entirely unworkable. The motivation can be to save the client money, particularly on environmental, health or safety requirements for which the client feels there would be no economic payback. In my experience individuals representing the employer and applying such pressure may, occasionally be registered engineers or geoscientists. Opposition to such pressure can have consequences for one's employment.

Clients can (and sometimes do) place pressure on registered engineers to approve and seal designs and documents with which the engineer disagrees or with which they have not been involved. In the case where the registered engineer is an employee of a consulting company, clients can (and sometimes do) ask the employer to place pressure on the registered engineer. (I have personally sought legal support against my employer in such a case.)

Unprofessional behaviour by organizations

Organizations may assign professionally unqualified employees to undertake an engineering task. In this case the onus is entirely on the employee to refuse the assignment which can often lead to unfavourable treatment and even dismissal. Registered engineers are, of course, required by the Engineers [and Geoscientists] Act to refuse such assignments but unregistered (and sometimes entirely unqualified staff) may be persuaded to undertake the task. Sometimes little persuasion is necessary because unregistered individuals understand that they have no responsibility for errors in their work.

Organizations, including government organizations, may chose to ignore professional advice particularly on environmental and safety issues but also on designs, installations and system operation. This puts the onus on the professional individual providing the advice (often an employee) to carefully document the situation to defend himself in the event of a failure, accident or injury. In this case, it should be the responsibility of the employer of the professional engineer or geoscientist to support the individual professional.

² See Appendix 3, written comments for question #16 in the Fall 2016 survey for more information on reasons why members oppose or support corporate regulation.

Organizational Influence

In the two surveys on corporate practice and corporate regulation, the task force sought further information on organizational influence and the potential effect of corporate regulation. In the survey undertaken in the summer of 2016, the task force asked whether respondents were aware of issues occurring because of a lack of regulatory oversight of organizations that practise engineering and geoscience.

Out of a total of 312 survey respondents, **56% of respondents indicated that they were aware of issues that indicated an organizational influence was having a negative impact on professional practice.**

This includes issues such as:

- lack of support from an employer for doing what is necessary for proper professional practice;
- cutting corners with respect to professional practice for the benefit of organizational interests;
- difficulty balancing responsibilities as a professional engineer/geoscientist/licensee and responsibilities as an employee of a business/organization;
- hiring engineers or geoscientists that are not qualified for the work;
- insufficient supervision and training of inexperienced workers;
- lack of awareness of senior staff of quality assurance procedures.

44% of survey respondents indicated that they have never experienced or seen organizational influence that diminishes the quality of individual professional practice.

In the second survey undertaken in the fall of 2016, the task force asked “based on your experience at your current workplace, does organizational influence have some effect on your practice (either positively or negatively)?”

Out of a total of 1,299 survey respondents for this question, **67% indicated that there is an organizational influence on their practice and 27% indicated that there is no organizational influence** (6% selected ‘other’).

In the summer 2016 survey, the task force received several written comments suggesting that organizational influence can be better addressed through the current system and with the practice review program rather than implementing a new regulatory program. These comments emphasized that while there is an organizational influence on corporate practice, this influence does not necessarily need to be addressed through regulatory oversight over organizations—it could be addressed by strengthening the oversight over individual professionals and increasing the potential for compliance action if individual professionals put organizational interests before professional practice standards. The task force followed up this line of thinking with a question in the fall 2016 survey: “Compared to implementation of corporate regulation on all (or a subset of) organizations practising engineering and geoscience, do you think that increasing the number of individual practice reviews could achieve similar benefits for public protection?”

Out of 1,301 respondents, **15% stated “Yes – Increasing the number of individual practice reviews could achieve similar benefits for public protection compared to corporate regulation.**

In addition to the two surveys, the task force sought information on organizational influence from APEGBC’s Organizational Quality Management Program. This program undertakes quality management audits of the organizations that are voluntarily certified through the program. The task force heard from OQM Program staff that results of these quality management audits indicate a need for improving quality management practices at an organizational level, and thus indicate a strong link between organizational influence and the quality of practice.

Regulatory Requirements

The fall 2016 survey sought members’ views on whether they agreed with some of the existing regulatory requirements that are in place in other Canadian jurisdictions for engineering and geoscience organizations. Overall, members indicated a high degree of agreement with these corporate regulatory requirements (see Table 1).

Table 1: Fall 2016 Survey, Questions #3 to #7

Survey Question	Survey Results			Total # of Respondents
	Agree	Disagree	Undecided or neutral	
Question #3: “To what extent do you agree that owners or senior managers of all (or a subset of) organizations practising engineering and geoscience should have responsibility for maintaining an organization where professional practice can be conducted in alignment with the requirements of the Engineers and Geoscientists Act, Code of Ethics and Bylaws?”	84%	9%	7%	1,302
Question #4: “To what extent do you agree that APEGBC should have the authority to investigate all (or a subset of) organizations practising engineering and geoscience in the event of a complaint or an incident?”	71%	18%	11%	1,301
Question #5: “To what extent do you agree that all (or a subset of) organizations practising engineering and geoscience should be required to retain project documentation and make this documentation available in the event of an investigation by APEGBC?”	81%	9%	10%	1,301

Survey Question	Survey Results			Total # of
Question #6: <i>"To what extent do you agree that APEGBC should have the authority to verify that all (or a subset of) organizations practising engineering and geoscience have at least one APEGBC professional engineer, geoscientist, or licensee on staff that has the appropriate qualifications for the organization's area of practice?"</i>	83%	11%	6%	1,298
Question #7: <i>"To what extent do you agree that all (or a subset of) organizations practising engineering and geoscience in BC should be responsible for implementing and following organizational quality management procedures that facilitate and support individual compliance with APEGBC's Code of Ethics and Bylaws?"</i>	69%	15%	16%	1,300

3.2 Key Benefits

A key purpose of the consultation was to compile a comprehensive list of the potential benefits and concerns with respect to corporate regulation. A list of the potential benefits that were highlighted most frequently by members and stakeholders are included below along with some select quotes from the membership surveys for additional context.

- **Current issues with the practice of engineering and geoscience in BC having implications for public protection could be addressed:**
 - *"I owned an incorporated engineering company offering services to the public for 24 years in Ontario before coming to BC and had practiced easily under their corporate regulatory model during that time. Since coming to BC, I have worked only part time in the structural residential inspection field and have become so disillusioned with the lack of professional practice that I have quit working in that field entirely. There is absolutely no doubt in my mind that BC requires corporate regulation and it should be established as quickly as possible."*
 - *"Professional Engineers working in small companies are under immense pressure to deviate from the codes and ethics when it conflicts with business goal/mandate. APEGBC's jurisdiction/oversight on organizations will provide the necessary support to young practicing engineers to stick to code and ethics when their decisions impact public safety."*
 - *"This corporate regulation is really important. There are presently consulting companies where management is not aligned with APEGBC objectives and it makes it very difficult for PEng employees to uphold the high quality they would like to deliver. Too often, the pressure is to cut corners and deliver the minimum quality product that will meet code. At times it requires fighting to convince them to meet minimum requirement. Eventually the PEng either quits or is fired for not being "cooperative". It makes it a very unhealthy work environment and puts public at risk if they take out too much of the safety margin."*

- *“Need to ensure organizations understand that practicing engineers must only practice in their own field. Many do not.”*
- *“Currently, customers must evaluate the qualifications of a firm to provide professional services. Customers are not generally qualified to do so.”*
- **Increased public and government confidence in the professions through strengthening of self-regulatory system:**
 - *“It is about time that the APEGBC regulated the industry to ensure that not only its members but that organizations involved in engineering and geoscience practices were following best practices and ensuring the public that our industry can actually self regulate itself.”*
 - *“This seems an appropriate due diligence step to protect the right to self-regulation given recent events in Québec and here in BC with realtors. I do not think we have the same level of potential or perceived dysfunction as the real estate sector, but our standard of care should also be much higher.”*
- **Greater awareness and support for the responsibilities of professionals from employers:**
 - *“Places some burden directly on companies to act ethically and in the interest of the public, whereas currently that generally lies only with individual engineers.”*
 - *“Corporate regulation would increase a firm’s willingness to (1) supply greater resources to defend individual engineers accused of unprofessional work and (2) support continuing education and learning.”*
 - *“Corporate regulation could prevent organizations from coercing engineers to take shortcuts or ignore public safety because of purely monetary reasons.”*
- **Increased value of APEGBC regulatory system to individual professionals:**
 - *“Empowerment of APEGBC Professionals within organizations where corporate practice conflicts with a Members professional practice.”*
 - *“Would provide a regulatory framework/assistance allowing SME/principal engineers to ‘push back’ on undue influence from executive/sales/customer management within difficult/complex projects.”*
 - *“Increased recognition of the value of APEGBC to its individual members as this would provide them with better employers!”*
 - *“I am pro regulation of the corporate practice of Engineering and Geoscience. By doing so, this will stress the importance of the Act and the duties of Engineers and Geoscientists to the corporation’s management. This will also allow APEGBC stricter regulation on the use of the Engineer and Geoscientist title individually at through use in a company title or name.”*
 - *“Increased regulatory efficiency—if there is a pattern of poor work you can change the organization, rather than a disparate number of individuals.”*

Some comments raised concern that regulation over corporate practice may be inevitable given the fact that every province and territory in Canada regulates engineering and geoscience organizations under a mandatory legislated authority except BC and Quebec, and in addition, Quebec’s engineering profession will likely pursue corporate regulation as it is recommended in

the Charbonneau Commission's Final Report (published in 2015).³ For members who saw corporate regulation as inevitable, they viewed it as beneficial for APEGBC to be proactive in proposing a model to the BC Government as opposed to a model being dictated to the profession in the future.

3.3 Key Concerns

During the consultation process, a wide range of concerns were heard in regards to pursuing regulatory oversight over engineering and geoscience organizations by APEGBC. The concerns raised consistently throughout the consultation process are summarized below along with some select quotes from the membership surveys that provide more context to the concern.

- **Corporate regulation will not be effective in enhancing public protection:**
 - *"This additional layer of regulation will not ensure bad things won't happen within companies. I doubt there is significant data to support a plague of bad and unethical behavior exists. There is nothing to show that you can regulate corporate responsibility to make it better. People are not robots and do not behave reliably in certain conditions. If they are going to misbehave, regulation will not stop them. This only adds cost and inefficiency for all those companies who would otherwise not need regulation. I believe almost all the firms to be regulated have no need for this."*
 - *"I question the effectiveness of this at protecting the public when we are already struggling with properly regulating/disciplining individuals. Perhaps a more rigorous discipline program with meaningful penalties would have a greater effect?"*
 - *"I worked for years in Alberta for a large engineering consulting firm. Aside from seeing the APEGA Permit in the main boardroom, I did not see how the APEGA requirement affected day-to-day operations. If APEGBC pursues corporate oversight—something I strongly support—please ensure that the oversight is of real substance and non-compliance has real consequences."*
- **Cost and effort for compliance—especially for small companies/sole-practitioners and organizations practicing in multiple jurisdictions:**
 - *"Small practices already have a host of things to comply to. Their efforts should be invested in meeting current requirements and guidelines. Additional regulation is just another administrative burden that will provide little to no benefit to public safety. For large corporate firms this may be different."*
 - *"We are Professional Engineers and don't need more regulations. For those who are charlatans or negligent make the penalty more severe. I can't imagine having to add to my administrative burden and still make a profit."*
 - *"For small companies and sole practitioners additional costs related to company licencing are proportionally larger than for larger organisations. If we must have this licencing program (which I'm still not convinced we really need), fee should be proportional to the number of P.Eng.s working for the organisation."*

³ See the following link for a translation of the Charbonneau Commission's recommendations related to the regulation of professional orders: <https://engineerscanada.ca/sites/default/files/charbonneurecom27-30et39-40-eng.pdf>

- **Corporate regulation will not add value to the practice of the professions:**
 - *“I am registered in Alberta, Ontario, Saskatchewan and the NWT, all of which have some form of corporate practice requirement/fee. I have not seen any benefit to the company I work for or to me as an individual from this. Based on my experience I do not see any reason why BC should follow the same model.”*
 - *“We practice in Alberta and Ontario. To-date we have seen no association involvement and no benefit from the corporate registration that is required in each of these provinces. Arguably this is because we are working in accordance with the applicable guidelines but it feels more like another grab for money that doesn't really accomplish anything.”*
- **Corporate regulation could dilute individual professional responsibility:**
 - *“For me the major issue is the potential ability for the individual to hide behind the corporate shield. If something were to go wrong, who holds the liability? ...”*
 - *“It is important to clearly outline and distinguish the professional responsibilities and liabilities at both corporate and individual levels. Professionals should not feel that they have any less responsibility as corporate employees and corporations should not be any less responsible than individual professionals. This will be successful if it helps provide consistent level of responsibility for individuals and corporations.”*
 - *“...I fear individual engineers could be confused into believing that they are less responsible, whereas I believe that individual accountability is the key to excellence in engineering. I would encourage clear messaging that the intent in the licensing is to regulate the professionals working for an organization and ensure support of those professionals but not to transfer responsibility from individuals to organizations...”*
- **Lack of confidence in APEGBC to administer corporate regulation effectively:**
 - *“I fear APEGBC has enough to handle at this current time adding to the association additional requirements may only dilute certain active initiatives the organization is managing.”*
 - *“Not confident that APEGBC can implement a successful system.”*

The above comments demonstrate the wide range of important considerations in determining whether APEGBC should pursue corporate regulation. In developing their recommendations, the task force is examining the facts and arguments around each of the potential benefits and concerns with corporate regulation and will address them in their final report to APEGBC's Council.

3.4 Regulatory Coverage

The task force has been asked by APEGBC's Council to make a recommendation on whether APEGBC should pursue regulatory authority over corporate practice and if so, to define the types of organizations that should be subject to regulation. The fall 2016 survey asked members to identify which types of organizations should be covered by corporate regulation if it is pursued. The highest proportion of respondents agreed that consulting firms should be covered (71%) followed by public sector organizations and organizations that practice solely for internal consumption purposes. The majority of respondents (51%) indicated that they do not think sole-practitioners should be covered by a corporate regulation (see Table 2).

The fall 2016 survey also asked respondents for the reasons they believed sole-practitioners, organizations that practice solely for internal consumption purposes and public sector organizations should or should not be covered by corporate regulation. The main reasons that respondents provided are included in Table 3.

Table 2: Fall 2016 Survey, Questions #9-#13, What types of organizations should be covered?

Type of Organization	Survey Response			Total # of Respondents
	Yes	No	Don't Know or Undecided	
Consulting Firm	71%	20%	9%	1,296
Sole practitioners	42%	51%	7%	1,297
Organizations that practice solely for internal consumption purposes	42% (all) / 17% (some)	29%	12%	1,296
Public sector	59% (all) / 16% (some)	18%	6%	1,300

Table 3: Fall 2016 Survey, Questions #10-#13, What is the main reason you think corporate regulation should or should not apply to this type of organization?

Type of Organization	Main Reasons for including organization type	Main Reasons for excluding organization type
Sole practitioners	Sole practitioners are the owners of a business organization and therefore should align the responsibilities of their business with their own responsibilities as a professional.	Current regulatory system is sufficient for sole practitioners—with only one person involved in the organization, there would be no conflict between professional and corporate objectives.
Organizations that practice solely for internal consumption purposes	The practice of engineering and geoscience in these organizations has implications for public safety, human health and the environment.	Regulating engineering services in product companies is redundant as the ultimate regulation for product quality and safety needs lies with the product itself and/or through processes (such as ISO 9000 certification) that are driven by upstream consumers.
Public sector	The practice of engineering and geoscience in these organizations has implications for public safety, human health and the environment.	Public sector organizations are sufficiently regulated. There's not enough added value for regulating these organizations to justify the additional costs and bureaucracy.

Note: A more detailed summary of results for questions #10 to #13 is available in Appendix 3.

3.5 Corporate Regulatory Models

To investigate the potential benefits and challenges of regulating engineering and geoscience organizations, the task force undertook a review of potential corporate regulatory models. This was only a preliminary review of corporate regulatory options as the task force has only been mandated to advise on whether APEGBC should seek regulatory authority over corporate practice and to define the types of organizations, if any, that should be subject to APEGBC regulatory oversight. The results of this review were written up in the task force's discussion paper to inform the consultation process and seek feedback from members and stakeholders on if there is a preferred approach to corporate regulation. If APEGBC's Council decides to seek regulatory authority over corporate practice, a more comprehensive evaluation of options for corporate regulation will be needed and the provincial government will need to initiate any changes to the *Act*.

The main finding of the review was that there are two distinct approaches that could be taken to regulating engineering and geoscience organizations, which the task force labelled a "basic model" and a "quality-management focused model." A more fulsome description of these models can be found in the discussion paper and a summary description is included in the text boxes below.

The fall 2016 survey described the differences between these two models and asked members: "If APEGBC decides to seek regulatory authority for corporate practice, do you think a basic model for corporate regulation or a quality management focused model should be applied?"

Out of 1,293 respondents, **44% selected the basic model, 30% selected the quality-management focused model and 26% selected either "don't know or undecided" or "other."**

Corporate Regulatory Models – Basic

The **basic model** is representative of what most other Canadian jurisdictions have in place for engineering and geoscience organizations (e.g., SK, MB, YK, NWT and NU, ON, PEI, NL). The requirements to receive a permit/certificate in a basic model are completion of an application form and payment of a fee. A few jurisdictions also require the submission of supporting documents. The basic model provides the following functions:

- prohibits the practice of professional engineering and geoscience by regulated organizations unless they obtain a permit/certificate;
- provides for a registry of regulated organizations practising engineering and geoscience in the jurisdiction;
- ensures regulated organizations employ professional engineers, geoscientists, and/or licensees;
- specifies the responsibility of regulated organizations to comply with the *Act* regulating engineering and geoscience in the jurisdiction, and the Bylaws and Code of Ethics of the regulatory authority;
- designates corporate representatives that assume some responsibility for supporting corporate practice that complies with the *Act*, Bylaws and Code of Ethics;
- provides the regulatory association the authority to investigate regulated organizations in the event of an incident or complaint and the authority to require the production of relevant documents to inform the investigation.

Corporate Regulatory Models – Quality-management Focused

A **quality-management focused model** includes all of the functions of the basic model and adds requirements and compliance mechanisms to proactively encourage good practice and reduce risks to public safety, public health, the welfare of the public and the environment. The only corporate regulation in Canada for engineering and geoscience organizations that applies a quality-management component is in Alberta.

BC's voluntary OQM Program also provides ideas for what additional requirements and compliance mechanisms could look like in a quality-management focused corporate regulatory model. The OQM program certifies participating organizations only after they have developed processes and procedures for quality management that meet the standards established by the program. Processes and procedures are implemented in seven areas: (1) APEGBC practice guidelines, (2) retaining project documentation, (3) checking engineering and geoscience work, (4) independent review of structural designs, (5) use of APEGBC seal, (6) direct supervision, and (7) field reviews.

Both Alberta's corporate regulatory model and the OQM Program use audits to verify compliance. If issues are identified in the audits, the associations enter into proactive discussions on how the issue can be resolved.

The main reason provided for supporting the basic model was that it addresses the fundamental concerns with limited additional bureaucracy (e.g., aligning responsibilities of organizations and professions, providing a mechanism to hold organization to account in the event of an incident or complaint). The main reason provided for supporting a quality management focused model was that it would demonstrate the professions are being proactive, and would enhance the reputation of the professions, which both contribute to APEGBC's objective of demonstrating that it can operate in a self-regulatory manner (see results for fall 2016 survey question #15 in Appendix 3 for more detail).

In addition to the quantitative results from surveys, the task force received numerous pieces of advice and suggestions for developing a corporate regulatory model through written comments in surveys and emails and discussions at consultation events. Recurring advice and suggestions from members and stakeholders on the development and implementation of a corporate regulatory model for engineering and geoscience organizations is summarized below:

- **Must add value:** Ensure the design and implementation of corporate regulation provides added value to the public and the professions and is not just a fee-grab.
- **Minimize additional fees and administrative effort on small organizations and sole-practitioners:** Small organizations and sole-practitioners are already having challenges with the various fees required to practise and run a business, especially if they practise in multiple jurisdictions. Consider a sliding scale for fees based on the size of organization (which could be defined by the number of professionals employed or billings/revenue), and consider an exemption on fees for sole-practitioners if they are covered by the regulation.

- **Need strong enforcement mechanisms:** Unless regulatory requirements are effectively enforced, they will not have their intended effect to protect the public. Non-compliance needs to have real consequences.
- **Need protection or support for whistleblowers:** If a professional is faced with the choice of doing a) something against the Code of Ethics or b) losing their job/contract, there needs to be a mechanism to support them.
- **Minimize impact to OQM Program:** Ensure corporate regulation does not negatively impact what has been achieved with the OQM program. Take care that corporate regulation interacts well with OQM, including avoiding the duplication of fees for organizations that are OQM certified and are covered by corporate regulation.
- **Use OQM to inform the development of a corporate regulatory model:** Consider making OQM mandatory. It has proven that it is a value-added program for the practice of professions and to the protection of the public. For instance, some or all of OQM's certification requirements could be used as regulatory requirements in a corporate regulatory model administered by APEGBC.
- **Implement a cost-recovery model similar to OQM:** A corporate regulatory system should not generate additional funds for APEGBC over and above the cost of administering the system. Consider a cost-recovery model similar to the one implemented in APEGBC's OQM program that also includes a sliding scale based on the number of professionals employed by an organization.⁴
- **Unify corporate regulatory systems for engineering and geoscience across Canadian jurisdictions:** To reduce fees and administrative effort for organizations practising in multiple jurisdictions, unify the corporate regulatory systems across Canada—for example through reciprocating agreements to allow engineering and geoscience to be done in different provinces/territories under a single license.

4. Next Steps

The task force is currently in the process of reviewing consultation feedback and formulating their recommendations to APEGBC's Council. A final report with the task force's recommendations will be submitted to APEGBC's Council in the spring of 2017. APEGBC's Council will then review the recommendations and decide how to proceed with respect to corporate practice and corporate regulation. Members and stakeholders will have further opportunities to engage if regulatory oversight over corporate practice is pursued further by Council. Updates on the Corporate Practice Review will be posted on the APEGBC website at apeg.bc.ca/corporatepractice as they become available.

Appendices

See companion report for the following appendices:
Appendix 1 – Detailed List of Consultation Activities
Appendix 2 – Summer 2016 Survey Results
Appendix 3 – Fall 2016 Survey Results

⁴ Note – the OQM formula for determining annual fees of a participating organization is 200 multiplied by the square root of the number of professionals employed by the organization.

Consultation Summary Report Appendices 1 to 3

Advisory Task Force on Corporate Practice

Advisory Task Force on Corporate Practice:

Mike Currie, P.Eng., FEC (Chair)
Patricia Chong, P.Eng.
David Chwacklinski, P.Eng., FEC
Dr. Michael Davies, P.Eng./P.Geo.
Catherine Fritter, P.Eng.
Kathy Groves, P.Eng.
Adrian Gyax, P.Eng., Struct. Eng.
Scott Martin, P.Eng.
David Melville, P.Geo.
Andy Mill, P. Eng., Struct.Eng., FEC
Ed Miska, P.Eng.
Dirk Nyland, P.Eng.
Julius Pataky, P.Eng.
Gregory Scott, P.Eng.
Colin Smith, P.Eng., FEC, FGC (Hon.)
John Turner, P.Ag. (Ret.)
Selena Wilson, P.Eng.

Prepared for: APEGBC Members and Stakeholders
Prepared by: Advisory Task Force on Corporate Practice
Version date: March 10, 2017

Table of Contents

Appendix 1 – Detailed List of Consultation Activities	1
Appendix 2 – Summer 2016 Survey Results	4
Question #1 – Familiarity	4
Question #2 – Benefits	4
Question #3 – Concerns	5
Question #4 – Problem	6
Question #5 – Types of Organizations	8
Question #6 – Consultation process	9
Question #7 – Anything else?	10
Questions #8 to #11 – Demographics	11
Appendix 3 – Fall 2016 Survey Results	13
Question #1 – Familiarity	13
Question #2 – Organizational Influence	13
Question #3 - Alignment with Act, Code of Ethics and Bylaws	14
Question #4 – Investigation	15
Question #5 – Retention of Project Documentation	15
Question #6 – Check on Competency	16
Question #7 – Quality Management Procedures	16
Question # 8 – Other Approaches	17
Question #9 – Consulting Firms	17
Question #10, #10.1, and #10.2 – Sole Practitioners	18
Question #11, #11.1, and #11.2 - Organizations that practise solely for internal consumption purposes	20
Question #12, #12.1 and #12.2 – Public sector organizations	22
Question #13 – Other Criteria to determine regulatory coverage	24
Question #14 – Fees	25
Question #15, #15.1, and #15.2 – Regulatory Models	27
Question #16 – Anything else?	29
Questions #17 to #22 – Demographics	31

Appendix 1 – Detailed List of Consultation Activities

Input Category	Item	Description
Member and Stakeholder Surveys	Summer 2016 Survey	See Appendix 2 for the Summer 2016 Survey results. This survey was open from July 6 to Aug. 31, 2016, and had 312 respondents.
	Fall 2016 Survey	See Appendix 3 for the Fall 2016 Survey results. This survey was open from Oct. 4 to Nov. 30, 2016 and had 1,307 respondents.
Publications on the Corporate Practice website, <i>Innovation</i> , <i>Enews</i>	Backgrounder	On June 6, 2016, APEGBC published a 4-page backgrounder on the examination of corporate practice.
	Discussion Paper	On September 26, 2016, the advisory task force published their Discussion Paper on corporate practice and corporate regulation.
	<i>Innovation</i>	Articles on the corporate review appeared in the June 2015, March 2016, May 2016, and April 2016 issues of <i>Innovation</i> .
	APEGBC ENews	Updates on the corporate practice review were included in Enews distributions.
Emails from membership	Emails to corporatepractice@apegbc.ca	See Appendix 4 for summary of input received from these emails. 13 substantive emails were received between July 1, 2016 and Dec. 31, 2016.
Outreach to membership	Annual Conference 2016	A presentation based on the task force's Discussion Paper was provided on Oct. 21, 2016. About 30 APEGBC members participated in the session.
	Branch Representatives	A presentation on the corporate practice review was given at the Branch Representatives Fall Meeting on Oct. 21, 2016. (Cont'd)

Input Category	Item	Description
	Memos to internal stakeholders	Memos circulated to relevant APEGBC divisions and practice committees November 2016: Building Codes Committee, Building Enclosure Committee, Consulting Practice Committee, DEERE, DEGIRS, DEP, Geoscience Committee, Investigation Committee, MED, OQM Committee, Practice Review Committee, Professional Practice Committee.
	Webinar	The Chair of the task force led a webinar on Oct. 5, 2016. About 70 sites participated in the webinar. The webinar was recorded and made available through APEGBC website.
	Branch Meetings	<p>Branch meetings were held in:</p> <ul style="list-style-type: none"> • Nanaimo Branch (all member invite), Nov. 3, 2016 • Sea-to-Sky Branch (Branch executive), Nov. 10, 2016 • South Central (Kamloops) (all member invite), Nov. 22, 2016 • Prince George (all member invite), Nov. 30, 2016 • Vancouver Branch (Monthly meeting), Dec. 6, 2016 • Sea-to-Sky Branch, Dec. 15, 2016 • Okanagan Branch, Feb. 1, 2017 • East Kootenay Branch, Feb. 21, 2017 <p>A joint meeting was offered in Burnaby-New Westminster, Tri-Cities, Fraser Valley Joint Branch, Feb. 22, 2017, but cancelled due to low registration.</p>
Outreach to stakeholders	Memos to stakeholders	<p>40 Memos with invitations to complete the online survey or provide a written submission were distributed to targeted stakeholders including municipal and provincial government, associations, utilities, public safety and health authorities, and internal APEGBC committees and divisions. 200 Memos were distributed to OQM certified firms.</p> <p>42 stakeholders responded to the Fall 2016 Survey.</p> <p>(Cont'd)</p>

Input Category	Item	Description
		<p>Submissions were received from:</p> <ol style="list-style-type: none"> 1. Association of Consulting Engineering Companies British Columbia (ACEC-BC) 2. British Columbia Securities Commission (BCSC) 3. Union of British Columbia Municipalities (UBCM) 4. Metro Vancouver (staff) 5. BC Hydro 6. AMEBC
	<p>Meetings with the Association of Consulting Engineering Companies BC (ACEC-BC)</p>	<p>The Chair of the advisory task force met with ACEC-BC twice and ACEC-BC representatives presented to the task force at their Dec. 6, 2016 meeting.</p>

Appendix 2 – Summer 2016 Survey Results

This appendix presents the quantitative and qualitative results of the Summer 2016 survey to inform the task force’s review of corporate practice. There were 312 respondents to this survey. Not all respondents respond to every question, so the total number of respondents for each question can be lower than the total number of respondents for the survey. To summarize the written comments provided in this report, an independent consultant that is supporting the task force reviewed the written comments and grouped these comments under themes. The number of comments under each theme is provided in the summary tables for written comments below. The task force was also provided the full text of all written comments provided through the survey.

Question #1 – Familiarity

Question #1: How familiar are you with corporate regulation models for engineering and geoscience organizations used in other jurisdictions in Canada?

Table 1: Summer 2016 Survey, Question #1, Quantitative Results

Choice	Response Percent	Response Total
1 Very familiar	21%	64
2 Somewhat familiar	46%	143
3 Not familiar	34%	105
Total Respondents		312
Total Skipped		18

Question #2 – Benefits

Question #2: In your opinion, what would be the main benefits of regulation of engineering and geoscience organizations in BC by APEGBC? (Check all that apply)

Table 2: Fall 2016 Survey, Question #2, Quantitative Results

Choice	Response Percent	Response Total
1 Increased public safety	39%	123
2 Increased public confidence in the profession	49%	152
3 Increased consistency and quality of professional services across all organizations employing APEGBC professionals	49%	152
4 Enhanced reputation and accountability within the profession	42%	132
5 Increased fairness (i.e., level playing field) through consistency of corporate practices that impact the quality of professional engineering and geoscience in BC	42%	131

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Choice		Response Percent	Response Total
6	Increased collective learning for the professions through regulatory actions taken	21%	67
7	I see no benefits to regulatory oversight of corporations	29%	89
8	Other. Please specify:	13%	39
Total Respondents			312
Total Skipped			18

Table 3: Summer 2016 Survey, Question #2, Written Comments

Written Comments for question: "In your opinion, what would be the main benefits of regulation of engineering and geoscience organizations in BC by APEGBC?"	
Comment Theme	# of Comments
Corporate regulation will enhance public protection through improving professional practice	18
Other benefits	5
Considerations or questions	8
No benefits - Regulation of individual professionals (and/or OQM) seems sufficient	6
N/A*	2
Total	39
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.	

Question #3 – Concerns

Question #3: What are the main concerns you have with the regulation of engineering/geoscience organizations in BC? (check all that apply)

Table 4: Summer 2016 Survey, Question #3, Quantitative Results

Choice		Response Percent	Response Total
1	I do not have any concerns at this point	24%	74
2	Dilution of professional responsibility at the individual practice level	30%	94
3	Additional costs to APEGBC to implement and administer a new regulatory system	39%	123

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Choice	Response Percent	Response Total
4 Additional requirements to firms that affect their competitiveness	27%	84
5 Additional costs to firms (e.g., registration fees and administrative costs to comply with regulation)	46%	143
6 Increased liability concerns for organizations	17%	52
7 Not enough value added to justify the costs and effort (e.g., value for public protection and the profession)	38%	117
8 Other. Please specify:	14%	45
Total Respondents		312
Total Skipped		18

Table 5: Summer 2016 Survey, Question #3, Written Comments

Written Comments for question: "What are the main concerns you have with the regulation of engineering/geoscience organizations in BC?"	
Comment Theme	# of Comments
Support for corporate regulation (But it needs to be effective)	10
Concern with corporate regulation - APEGBC capacity to effectively implement and enforce	11
Concern with corporate regulation - does not provide the same value as OQM	2
Concern with corporate regulation - Costs and effort to comply, especially for small companies	9
Concern with corporate regulation - No value / Redundancy with existing regulation of individual professionals	7
Unique Comments (cannot group into common theme)	6
Total	45

Question #4 – Problem

Question #4: Are you aware of any of the following that may be a result of a lack of regulatory oversight of engineering and geoscience organizations? (Check all that apply)

Table 6: Summer 2016 Survey, Question #4, Quantitative Results

Choice	Response Percent	Response Total
1 Lack of support from an employer for doing what is necessary for proper professional practice	36%	111

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Choice	Response Percent	Response Total
2 Cutting corners with respect to professional practice for the benefit of corporate interests	37%	114
3 Difficulty balancing the responsibilities of a professional engineer/geoscientist/licensee and responsibilities as an employee of a business/organization	41%	124
4 None apply (I have never experienced or seen organizational influence that diminishes the quality of individual professional practice)	40%	123
5 Other ways you've experienced or seen organizational influence diminish the quality of individual professional practice. Please specify:	17%	52
Total Respondents		305
Total Skipped		25

Table 7: Summer 2016 Survey, Question #4, Written Comments

Written Comments for question: "Are you aware of any of the following that may be a result of a lack of regulatory oversight of engineering and geoscience organizations?"	
Comment Theme	# of Comments
Pressure from employers, managers, and or clients that impacts quality of practice	13
Cutting corners	7
Organizations and/or individuals practicing outside of their area of expertise	6
Insufficient support of professional employees' requirements	4
Only some concern with organizational influence	4
It is duty of individual professionals to not let organizational influence negatively impact professional practice	4
Unique Comments (cannot group into common theme)	10
Total Respondents	52

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Question #5 – Types of Organizations

Question #5: Regulatory oversight could be applied to all organizations or a subset of organizations that employ APEGBC professionals and provide services/products requiring the application of professional engineering/geoscience. If the Advisory Task Force were to recommend the regulation of engineering and geoscience organizations in BC, what are the types of organizations that you think should be regulated? (Check all that apply)

Table 8: Summer 2016 Survey, Question #5, Quantitative Results

Choice	Response Percent	Response Total
1 Sole Practitioners	48%	143
2 Organizations providing consulting engineering and geoscience services	74%	220
3 Organizations carrying out professional activities related to engineering and/or geoscience testing and assessment	66%	196
4 Private sector companies carrying out professional engineering/geoscience for internal consumption purposes involving the manufacturing of custom design products, structures, processes or facilities	48%	144
5 Private and public sector organizations carrying out professional engineering/geoscience for internal consumption purposes (e.g., public utilities, crown corporations, municipal governments, private utility providers)	60%	177
6 Other. Please specify:	21%	61
Total Respondents		297
Total Skipped		33

Table 9: Summer 2016 Survey, Question #5, Written Comments

Written Comments for question: “If the Advisory Task Force were to recommend the regulation of engineering and geoscience organizations in BC, what are the types of organizations that you think should be regulated?”	
Comment Theme	# of Comments
No organizations (opposed to corporate regulation)	25
Other criteria	13
All organizations that practice engineering and/or geoscience	12
All public sector organizations	4
All organizations whose practice of engineering or geoscience could impact	2

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

public safety, health, and welfare, and the environment.	
All organizations that employ professional engineers and geoscientists	2
N/A*	3
Total	61
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.	

Question #6 – Consultation process

Question #6: The Advisory Task Force will be reviewing the issue of corporate practice and consulting with members and stakeholders for the remainder of the calendar year. The Advisory Task Force will provide a recommendation to APEGBC's Council in early 2017 on whether to pursue regulatory authority for corporate practice. How would you like to be updated and consulted with during the Advisory Task Force's review process? (Check all that apply)

Table 10: Summer 2016 Survey, Question #6, Quantitative Results

Choice	Response Percent	Response Total
1 Regular updates on APEGBC's Corporate Practice webpage	40%	125
2 Regular updates in <i>Innovation</i> magazine	55%	171
3 Newsletters and email updates	76%	234
4 Access to task force meeting summary notes	32%	99
5 Attending a branch meeting with task force members/APEGBC to be updated on the review once the exploratory options have been identified	11%	34
6 Attending a webinar hosted by task force members/APEGBC to be updated on the review once the exploratory options have been identified	22%	68
7 Attending meetings with the task force/APEGBC through your affiliated organizations (e.g., AMEBC, ACEC-BC, etc.)	6%	18
8 Having a dedicated session on corporate practice at the Annual Conference and AGM in October (Victoria)	19%	58
9 Providing input through additional surveys at strategic times throughout the review process	55%	171
10 Providing feedback and comments via email	35%	108
Total Respondents		309
Total Skipped		21

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Question #7 – Anything else?

Question #7: Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?

Table 11: Summer 2016 Survey, Question #7, Written Comments

Written Comments for question: “Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?”		
Category	Comment Theme	# of Comments
Opposition to corporate regulation	Opposed to corporate regulation because the current system is sufficient and/or it is redundant with the existing system of regulating individual professionals.	8
	Opposed because does not have confidence in APEGBC or thinks APEGBC should focus on improving implementation of current programs before developing new programs.	6
Support for corporate regulation	Support for corporate regulation (no reason given).	5
	Support for corporate regulation due to current issues with professional practice in BC	6
	Support for corporate regulation to enhance public protection and/or the value of the professions	6
	Support for proceeding with corporate regulation before the BC government moves ahead with it unilaterally.	2
Concerns with corporate regulation	Concerned with the impact of corporate regulation on small companies and/or sole-practitioners	6
	Concerned that corporate regulation would not be value-added to the public and/or the professions	13
	Concerned that corporate regulation would dilute individual professional responsibility	8
	Concerned that corporate regulation could harm APEGBC's Organizational Quality Management (OQM) Program	2
Other Comments	Input on regulatory coverage or regulatory model	42
	Need to better describe or analyze the problem that corporate regulation would fix	4
	Suggestions for the Task Force Review on Corporate Practice	13
	Unique comments (cannot group into common theme)	21
	No comment or N/A*	12
Total Respondents		157
*N/A is designated to comments that are not related to the topic of corporate practice or		

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Written Comments for question: *“Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?”*

Category	Comment Theme	# of Comments
corporate regulation.		

Questions #8 to #11 – Demographics

Question #8: *Are you an APEGBC member?*

Table 12: Summer 2016 Survey, Question #8

Choice	Response Percent	Response Total
1 Yes	97%	304
2 No	3%	10
Total Respondents		314
Total Skipped		16

Question #9: *What is your area of practice?*

Table 13: Summer 2016 Survey, Question #9

Choice	Response Percent	Response Total
1 Engineering	89%	266
2 Geoscience	11%	34
Total Respondents		300
Total Skipped		20

Question #10: *What size of organization do you work for?*

Table 14: Summer 2016 Survey, Question #10

Choice	Response Percent	Response Total
1 Sole-proprietorship (1 APEGBC professional)	26%	77
2 2-5 APEGBC professionals	20%	58
3 >5 APEGBC professionals	54%	161
Total Respondents		296
Total Skipped		24

**APEGBC Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #2**

Question #11: What sector do you work in? (Check all that apply)

Table 15: Summer 2016 Survey, Question #11

Choice		Response Percent	Response Total
1	Aerospace	2%	7
2	Construction	22%	64
3	Consulting Firms	56%	165
4	Provincial government	6%	17
5	Municipal government	7%	21
6	Health care	2%	6
7	High technology	7%	22
8	Manufacturing	9%	26
9	Marine	4%	11
10	Natural resources	24%	72
11	Utilities	16%	48
12	Other	12%	36
Total Respondents			295
Total Skipped			25

Appendix 3 – Fall 2016 Survey Results

This appendix presents the quantitative and qualitative results of the Fall 2016 survey to inform the task force’s review of corporate practice. There were 1,307 respondents to this survey. Not all respondents respond to every question, so the total number of respondents for each question can be lower than the total number of respondents for the survey. To summarize the written comments provided in this report, an independent consultant that is supporting the task force reviewed the written comments and grouped these comments under themes. The number of comments under each theme is provided in the summary tables for written comments below. The task force was also provided the full text of all written comments provided through the survey.

Question #1 – Familiarity

Question #1: “How familiar are you with the corporate regulation models for engineering and geoscience organizations used in other jurisdictions in Canada?”

Table 16: Fall 2016 Survey, Question #1, Quantitative Results

Choice	Response Percent	Response Total
1 Very familiar	15%	190
2 Somewhat familiar	47%	617
3 Not familiar	38%	492
Total Respondents		1,299
Total Skipped		8

Question #2 – Organizational Influence

Question #2: “Based on your experience at your current workplace, does organizational influence have some effect on your practice (either positively or negatively)? (please skip question if you are not a member of APEGBC)”

Table 17: Fall 2016 Survey, Question #2, Quantitative Results

Choice	Response Percent	Response Total
1 Other: Please specify	6%	73
2 Yes – there is an organizational influence on individual practice.	67%	874
3 No – there is no organizational influence on individual practice.	27%	347
4 Skipped – I am not a member of APEGBC	0%	5
Total respondents		1,299
Total skipped		8

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Table 18: Fall 2016 Survey, Question #2, Written Comments

Written Comments for question: “Based on your experience at your current workplace, does organizational influence have some effect on your practice (either positively or negatively)?”	
Comment Theme	# of Comments
Organizations have a positive influence (in my experience)	20
Organizations have no influence (in my experience)	8
Organizations can have a negative influence (in my experience)	4
N/A - Retired, sole practitioner, self-employed, etc.	33
N/A – unknown or no comment	8
Total Respondents	73

Question #3 - Alignment with Act, Code of Ethics and Bylaws

Question #3: “To what extent do you agree that owners or senior managers of all (or a subset of) organizations practising engineering and geoscience should have responsibility for maintaining an organization where professional practice can be conducted in alignment with the requirements of the Engineers and Geoscientists Act, Code of Ethics and Bylaws?”

Table 19: Fall 2016 Survey, Question #3, Quantitative Results

Choice	Response Percent	Response Total
1 Strongly agree	47%	611
2 Agree	37%	477
3 Undecided or neutral	7%	97
4 Disagree	5%	65
5 Strongly disagree	4%	52
Total Respondents		1,302
Total Skipped		5

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #4 – Investigation

Question #4: “To what extent do you agree that APEGBC should have the authority to investigate all (or a subset of) organizations practising engineering and geoscience in the event of a complaint or an incident?”

Table 20: Fall 2016 Survey, Question #4, Quantitative Results

Choice		Response Percent	Response Total
1	Strongly agree	35%	453
2	Agree	36%	464
3	Undecided or neutral	11%	147
4	Disagree	11%	143
5	Strongly disagree	7%	94
Total Respondents			1,301
Total Skipped			6

Question #5 – Retention of Project Documentation

Question #5: “To what extent do you agree that all (or a subset of) organizations practising engineering and geoscience should be required to retain project documentation and make this documentation available in the event of an investigation by APEGBC?”

Table 21: Fall 2016 Survey, Question #5, Quantitative Results

Choice		Response Percent	Response Total
1	Strongly agree	42%	545
2	Agree	39%	511
3	Undecided or neutral	10%	131
4	Disagree	5%	67
5	Strongly disagree	4%	47
Total Respondents			1,301
Total Skipped			6

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #6 – Check on Competency

Question #6: “To what extent do you agree that APEGBC should have the authority to verify that all (or a subset of) organizations practising engineering and geoscience have at least one APEGBC professional engineer, geoscientist, or licensee on staff that has the appropriate qualifications for the organization’s area of practice?”

Table 22: Fall 2016 Survey, Question #6, Quantitative Results

Choice		Response Percent	Response Total
1	Strongly agree	55%	713
2	Agree	28%	369
3	Undecided or neutral	6%	84
4	Disagree	6%	73
5	Strongly disagree	5%	59
Total Respondents			1,298
Total Skipped			9

Question #7 – Quality Management Procedures

Question #7: “To what extent do you agree that all (or a subset of) organizations practising engineering and geoscience in BC should be responsible for implementing and following organizational quality management procedures that facilitate and support individual compliance with APEGBC’s Code of Ethics and Bylaws?”

Table 23: Fall 2016 Survey, Question #7, Quantitative Results

Choice		Response Percent	Response Total
1	Strongly agree	32%	417
2	Agree	37%	485
3	Undecided or neutral	16%	204
4	Disagree	9%	119
5	Strongly disagree	6%	75
Total Respondents			1,300
Total Skipped			7

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question # 8 – Other Approaches

Question #8: “Compared to implementation of corporate regulation on all (or a subset of) organizations practising engineering and geoscience, do you think that increasing the number of individual practice reviews could achieve similar benefits for public protection?”

Table 24: Fall 2016 Survey, Question #8, Quantitative Results

Choice		Response Percent	Response Total
1	Yes – Increasing the number of individual practice reviews could achieve similar benefits for public protection compared to corporate regulation.	15%	189
2	No – The benefits for public protection from corporate regulation are distinctly different than the benefits from individual practice reviews.	59%	768
3	No – I do not see benefits to individual practice reviews or corporate regulation	17%	215
4	Don't Know or Undecided	10%	129
Total Respondents			1,301
Total Skipped			6

Question #9 – Consulting Firms

Question #9: “If APEGBC decides to seek regulatory authority for corporate practice, do you think consulting firms providing engineering and geoscience services should be covered by corporate regulation?”

Table 25: Fall 2016 Survey, Question #9, Quantitative Results

Choice		Response Percent	Response Total
1	Yes – Consulting firms should be covered by corporate regulation.	71%	920
2	No – Consulting firms should not be covered by corporate regulation.	20%	257
3	Don't Know or Undecided	9%	119
Total Respondents			1,296
Total Skipped			11

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #10, #10.1, and #10.2 – Sole Practitioners

Question #10: “If APEGBC decides to seek regulatory authority for corporate practice, do you think sole practitioners providing engineering and geoscience services should be covered by the corporate regulation?”

Table 26: Fall 2016 Survey, Question #10, Quantitative Results

Choice		Response Percent	Response Total
1	Yes – Sole practitioners should be covered by corporate regulation.	25%	319
2	Yes – Sole practitioners should be covered, but only those that have been incorporated.	17%	224
3	No – Sole practitioners should be excluded from corporate regulation.	51%	659
4	Don't Know or Undecided	7%	95
Total Respondents			1,297
Total Skipped			10

Question #10.1: “What is the main reason you think corporate regulation should apply to sole practitioners that practise engineering and geoscience?”

Table 27: Fall 2016 Survey, Question #10.1, Quantitative Results

Choice		Response Percent	Response Total
1	Sole practitioners are the owners of a business organization and therefore should align the responsibilities of their business with their own responsibilities as a professional.	39%	207
2	Corporate regulation could address concerns that some sole practitioners do not have sufficient quality management practices.	21%	112
3	All professionals providing engineering and geoscience services should be treated equally regardless of the size of the firm.	37%	197
4	Other: Please specify	4%	19
Total Respondents			535
Total Skipped			8

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Table 28: Fall 2016 Survey, Question #10.1, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should apply to sole practitioners that practise engineering and geoscience?”	
Comment Theme	# of Comments
Reason for covering: Need for accountability and independent review	8
Reason for covering: Sole-practitioners can hire sub-contractors.	4
Suggestion: Cover incorporated individuals acting as firms	5
Disagree with covering: sole practitioners already covered	2
Total Respondents	19

Question #10.2: “What is the main reason you think corporate regulation should not apply to sole practitioners that practise engineering and geoscience?”

Table 29: Fall 2016 Survey, Question #10.2, Quantitative Results

Choice	Response Percent	Response Total
1 Current regulatory system is sufficient for sole practitioners – with only one person involved in the organization, there would be no conflict between professional and corporate objectives.	80%	520
2 The cost and effort would be too burdensome for sole practitioners.	12%	75
3 Other: Please specify	9%	57
Total Respondents		652
Total Skipped		7

Table 30: Fall 2016 Survey, Question #10.2, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should not apply to sole practitioners that practise engineering and geoscience?”	
Comment Theme	# of Comments
Reason for not covering: Current system is sufficient & Cost concern	39
Reason for not covering: Sole practitioners already covered	8
Reason for not covering: APEGBC needs better enforcement of existing regulations first	7
Unique comments (cannot group into common theme)	3
Total Respondents	57

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #11, #11.1, and #11.2 - Organizations that practise solely for internal consumption purposes

Question #11: “If APEGBC decides to seek regulatory authority for corporate practice, do you think the corporate regulation should cover organizations that practise only for internal consumption purposes?”

Table 31: Fall 2016 Survey, Question #11, Quantitative Results

Choice		Response Percent	Response Total
1	Yes – Corporate regulation should apply to ALL organizations that only practise engineering and geoscience for internal consumption purposes.	42%	550
2	Yes – Corporate regulation should apply to SOME of these organizations (such as organizations that provide custom design engineered products).	17%	221
3	No – Corporate regulation should not apply to organizations that only practise engineering and geoscience for internal consumption purposes.	29%	374
4	Don't Know or Undecided	12%	151
Total Respondents			1,296
Total Skipped			11

Question #11.1: “What is the main reason you think corporate regulation should apply to organizations that only practise engineering and geoscience for internal consumption purposes?”

Table 32: Fall 2016 Survey, Question #11.1, Quantitative Results

Choice		Response Percent	Response Total
1	All organizations that practise engineering and geoscience should be covered by corporate regulation.	16%	122
2	The practise of engineering and geoscience in these organizations has implications for public safety, human health and the environment.	60%	459
3	Corporate regulation would require these organizations to ensure the professionals employed by them can practise in line with APEGBC's Code of Ethics and Bylaws.	14%	104
4	Corporate regulation would provide a mechanism to hold these organizations to account in the event of an incident or complaint.	6%	49
5	Other: Please specify	4%	31
Total Respondents			765
Total Skipped			6

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Table 33: Fall 2016 Survey, Question #11.1, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should apply to organizations that only practise engineering and geoscience for internal consumption purposes?”	
Comment Theme	# of Comments
All reasons (1-4); safety, accountability, ethics, standards	14
One or a combination of reasons; safety, accountability, maximum coverage	13
Equal coverage across organizations	2
N/A*	2
Total Respondents	31
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.	

Question #11.2: “What is the main reason you think corporate regulation should not apply to organizations that only practise engineering and geoscience for internal consumption purposes?”

Table 34: Fall 2016 Survey, Question #11.2 Quantitative Results

Choice	Response Percent	Response Total
1 The practice of engineering and geoscience in these organizations has minimal risks to public safety, health and the environment – added value of corporate regulation does not justify additional costs and effort.	29%	106
2 Regulating engineering services in product companies is redundant as the ultimate regulation for product quality and safety needs lies with the product itself and/or through processes (such as ISO 9000 certification) that are driven by upstream consumers.	60%	219
3 Other: Please specify	11%	40
Total Respondents		365
Total Skipped		9

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Table 35: Fall 2016 Survey, Question #11.2, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should not apply to organizations that only practise engineering and geoscience for internal consumption purposes?”	
Comment Theme	# of Comments
Redundant or not required	18
Both reasons (1 and 2 from the question) - minimal risk to public, and redundant	10
Complexity of regulating these organizations	6
Unique Comments (cannot group into common theme)	3
N/A*	3
Total Respondents	40
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.	

Question #12, #12.1 and #12.2 – Public sector organizations

Question #12: “If APEGBC decides to seek regulatory authority for corporate practice, do you think the corporate regulation should cover public sector organizations?”

Table 36: Fall 2016 Survey, Question #12, Quantitative Results

Choice		Response Percent	Response Total
1	Yes – Corporate regulation should apply to all public sector organizations that practise engineering and geoscience.	59%	767
2	Yes – Corporate regulation should apply to some public sector organizations that practise engineering and geoscience.	16%	213
3	No – Corporate regulation should not apply to public sector organizations that practise engineering and geoscience.	18%	236
4	Don’t Know or Undecided	6%	84
Total Respondents			1,300
Total Skipped			7

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #12.1: “What is the main reason you think corporate regulation should apply to public sector organizations that practise engineering and geoscience?”

Table 37: Fall 2016 Survey, Question #12.1, Quantitative Results

Choice		Response Percent	Response Total
1	All organizations that practise engineering and geoscience should be covered by corporate regulation.	18%	179
2	The practice of engineering and geoscience in these organizations has implications for public safety, human health and the environment.	56%	544
3	Corporate regulation would require these organizations to ensure the professionals employed by them can practise in line with APEGBC’s Code of Ethics and Bylaws.	13%	130
4	Corporate regulation would provide a mechanism for holding these organizations to account in the event of an incident or complaint that is specific to their practise of engineering and geoscience.	7%	72
5	Other: Please specify	5%	46
Total Respondents			971
Total Skipped			9

Table 38: Fall 2016 Survey, Question #12.1, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should apply to public sector organizations that practise engineering and geoscience?”	
Comment Theme	# of Comments
One or a combination of reasons; safety, accountability, maximum coverage	15
Issues of accountability and influence	13
Equal coverage of all organizations	12
Public safety implications	5
Unique Comments (cannot group into common theme)	1
Total Respondents	46

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #12.2: “What is the main reason you think corporate regulation should not apply to public sector organizations that practise engineering and geoscience?”

Table 39: Fall 2016 Survey, Question #12.2, Quantitative Results

Choice		Response Percent	Response Total
1	Public sector organizations are sufficiently regulated.	45%	102
2	There’s not enough value-added for regulating these organizations to justify the additional costs and bureaucracy.	45%	103
3	Other: Please specify	10%	22
Total Respondents			227
Total Skipped			9

Table 40: Fall 2016 Survey, Question #12.2, Written Comments

Written Comments for question: “What is the main reason you think corporate regulation should not apply to public sector organizations that practise engineering and geoscience?”	
Comment Theme	# of Comments
Redundant or not required	14
Both reasons (1 and 2 from the question) - no value added, redundant	4
Unenforceable / difficult to implement	3
Unique Comments (cannot group into common theme)	1
Total Respondents	22

Question #13 – Other Criteria to determine regulatory coverage

Question #13: “Which of the items below do you think the Advisory Task Force should explore as ways to limit the types of organizations (if any) that should be subject to APEGBC regulatory oversight? (check all that apply)”

Table 41: Fall 2016 Survey, Question #13, Quantitative Results

Choice		Response Percent	Response Total
1	Organizations whose practise of engineering and/or geoscience have significant public safety risks	67%	832
2	Organizations that practise engineering and/or geoscience and have owners or senior executives that are not professional engineers or professional	47%	587

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Choice	Response Percent	Response Total
geoscientists		
3 Any organization that provides internal or external services where the use of the seal is necessary	52%	645
4 Organizations that practise engineering and/or geoscience and are not already certified by APEGBC's voluntary Organizational Quality Management Program.	28%	352
5 Other: Please specify	9%	109
Total Respondents		1,238
Total Skipped		69

Table 42: Fall 2016 Survey, Question #13, Written Comments

Written Comments for question: “Which of the items below do you think the Advisory Task Force should explore as ways to limit the types of organizations (if any) that should be subject to APEGBC regulatory oversight?”	
Comment Theme	# of Comments
Opposed to corporate regulation or APEGBC	59
All organizations that practise should be covered	22
Input on regulatory coverage criteria	14
Unique Comments (cannot group into common theme)	14
Total Respondents	109

Question #14 – Fees

Question #14: “Taking for example the average annual fee of \$500 across existing corporate regulatory models for engineering and geoscience organizations in Canada, do you think a fee of this magnitude would be too costly for engineering and geoscience organizations?”

Table 43: Fall 2016 Survey, Question #14, Quantitative Results

Choice	Response Percent	Response Total
1 No – This would be a reasonable fee, especially if a sliding scale was applied to give smaller organizations a break.	59%	767
2 Yes – This fee is too costly.	20%	263
3 Undecided or neutral	11%	144
4 Other: Please specify	9%	121

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Total Respondents	1,295
Total Skipped	12

Table 44: Fall 2016 Survey, Question #14, Written Comments

Written Comments for question: “Taking for example the average annual fee of \$500 across existing corporate regulatory models for engineering and geoscience organizations in Canada, do you think a fee of this magnitude would be too costly for engineering and geoscience organizations?”		
Category	Comment Theme	# of Comments
Comments on how fees should be determined and implemented	Fees should vary according to the size of organization (e.g. the # of professionals employed or the billings/revenue)	33
	Concerned with the cost burden of paying fees across multiple jurisdictions	3
	Fees should vary according to the amount of regulation that an organization requires	3
	Fees should be phased in	2
	Fees should be based on cost recovery model only	2
Comments on the fee amount	The corporate fee added to other fees would be too much for small companies and sole-practitioners	15
	I am more concerned about the cost of compliance	8
	An average fee of \$500/year would be reasonable for most companies	6
	A fee of \$500/year is too high	4
	An average annual fee of \$500 is too low	4
Comments on corporate regulation and/or fees in general	Opposed to corporate regulation	28
	Opposed to additional fees	3
Other	Unique Comments (cannot be grouped)	10
	Need more information to provide feedback	4
Total Respondents		125

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #15, #15.1, and #15.2 – Regulatory Models

Question #15: “If APEGBC decides to seek regulatory authority for corporate practice, do you think a basic model for corporate regulation or a quality management focused model should be applied?”

Table 45: Fall 2016 Survey, Question #15, Quantitative Results

Choice		Response Percent	Response Total
1	Basic Model	44%	563
2	Quality Management Focused Model	30%	385
3	Don't Know or Undecided	19%	251
4	Other: Please specify	7%	94
Total Respondents			1,293
Total Skipped			14

Table 46: Fall 2016 Survey, Question #15, Written Comments

<i>Written Comments for question: “If APEGBC decides to seek regulatory authority for corporate practice, do you think a basic model for corporate regulation or a quality management focused model should be applied?”</i>		
Category	Comment Theme	# of Comments
Recommendations for developing and/or implementing a corporate regulatory model	Apply a phased approach - start with basic then explore or implement a quality management focused model	8
	Explore hybrid models or other models (e.g., ISO 9000)	7
	Apply a basic model with the voluntary option for OQM and consider incentives to encourage OQM certification	6
	Other recommendations for regulatory model	4
	Support for quality management focused model, but with some qualifications	2
	Select whichever model has the least amount of associated fees and regulatory burden	2
Opposition to a specific model or corporate regulation in general	Opposition to corporate regulation	47
	Opposition to quality management-focused model and/or OQM	5
Other	Unique Comments (cannot group into common theme)	10
	No comment	3
Total Respondents		94

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #15.1: “What is the main reason you support the basic model of corporate regulation?”

Table 47: Fall 2016 Survey, Question #15.1, Quantitative Results

Choice		Response Percent	Response Total
1	Basic model addresses fundamental concerns with limited additional bureaucracy (e.g., aligning responsibilities of organizations and professions, providing a mechanism to hold organization to account in the event of an incident or complaint).	67%	376
2	Basic model will address the perceived regulatory gap between BC and other jurisdictions with limited additional bureaucracy.	14%	77
3	Basic model will be the least cost and will require the least amount of administrative effort on the part of organizations.	15%	86
4	Other: Please specify	4%	20
Total Respondents			559
Total Skipped			4

Table 48: Fall 2016 Survey, Question #15.1, Written Comments

Written Comments for question: “What is the main reason you support the basic model of corporate regulation?”	
Comment Theme	# of Comments
Keep quality management issues separate from APEGBC corporate regulatory model	7
Quality-management focused model is too prescriptive	3
All of the above	3
Unique Comments (cannot group into common theme)	4
N/A*	3
Total Respondents	20
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.	

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Question #15.2: *“What is the main reason you support a quality-management focused model?”*

Table 49: Fall 2016 Survey, Question #15.2, Quantitative Results

Choice		Response Percent	Response Total
1	A quality management focused model provides value-added for the public and the profession.	29%	108
2	A quality management focused model would demonstrate the profession is being proactive and would enhance the reputation of the profession – both of which contribute to the professions’ objective of demonstrating that it can operate in a self-regulatory manner.	65%	245
3	Other: Please specify	6%	24
Total Respondents			377
Total Skipped			8

Table 50: Fall 2016 Survey, Question #15.2, Written Comments

Written Comments for question: <i>“What is the main reason you support a quality-management focused model?”</i>	
Comment Theme	# of Comments
Quality management focused model will improve professional practice	14
All of the above	4
Unique Comments (cannot group into common theme)	6
Total Respondents	24

Question #16 – Anything else?

Question #16: *“Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?”*

Table 51: Fall 2016 Survey, Question #16, Written Comments

Written Comments for question: <i>“Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?”</i>		
Category	Comment Theme	# of Comments
Opposition to	Opposed to corporate regulation because the current system	50

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Written Comments for question: “Is there anything else that you would like to share about the Advisory Task Force’s examination of corporate practice and regulatory models for corporate oversight?”		
Category	Comment Theme	# of Comments
corporate regulation	is sufficient and/or it is redundant with the existing system of regulating individual professionals.	
	Opposed to corporate regulation because of the additional costs it will involve and/or the additional regulatory burden/bureaucracy.	32
	Opposed to corporate regulation because does not think it will be effective at enhancing public protection.	22
	Opposed to corporate regulation (no reason given).	10
	Opposed to corporate regulation because does not have confidence in APEGBC or thinks APEGBC should focus on improving implementation of current programs before developing new programs.	9
Support for corporate regulation	Support for corporate regulation to enhance public protection and/or the value of the professions.	19
	Support for corporate regulation due to concerns with the state of professional practice in BC.	15
	Support for corporate regulation (no reason given).	8
Concerns with corporate regulation	Concerned with the impact of corporate regulation on small companies and/or sole-practitioners	23
Input on corporate regulatory model/regulatory coverage	Input on corporate regulatory model (will be relevant and considered further if corporate regulation is pursued)	88
	Comments on what types of organizations should be covered by corporate regulation	52
	Need to consider the wide variety of engineering disciplines and ensure a corporate regulatory model makes sense for all (not just the 'mainstream' disciplines such as civil engineering)	7
Other	Unique comments (cannot group into common theme)	59
	No comment	51
	N/A*	3
Total Respondents**		448
*N/A is designated to comments that are not related to the topic of corporate practice or corporate regulation.		
**This total is higher than the total for written comments (441) because some written comments covered more than one theme.		

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Questions #17 to #22 – Demographics

Question #17: “Are you an APEGBC member?”

Table 52: Fall 2016 Survey, Question #17

Choice		Response Percent	Response Total
1	Yes	99%	1291
2	No	1%	7
Total Respondents			1,298
Total Skipped			9

Question #18: “What is your area of practice?”

Table 53: Fall 2016 Survey, Question #18

Choice		Response Percent	Response Total
1	Engineering	90%	1157
2	Geoscience	10%	123
Total Respondents			1,280
Total Skipped			20

Question #19: “Which of the following best describes what type of organization you work for?”

Table 54: Fall 2016 Survey, Question #19

Choice		Response Percent	Response Total
1	Consulting firm - sole practitioner (1 APEGBC professional)	19%	238
2	Consulting firm - small size (2-5 APEGBC professionals)	11%	144
3	Consulting firm - medium size (6-20 APEGBC professionals)	8%	98
4	Consulting firm - large size (20+ APEGBC professionals)	21%	273
5	Private sector company carrying out professional engineering/geoscience for internal consumption purposes only (e.g., engineered product company, resource companies)	18%	229
6	Public sector - crown corporation, public utility, etc.	7%	85
7	Public sector - municipal	3%	43
8	Public sector - provincial	3%	39
9	Public sector - federal	1%	13
10	Non-profit sector	1%	11
11	Other: Please specify	9%	110

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Choice	Response Percent	Response Total
Total Respondents		1,283
Total Skipped		17

Question #20: “What sector do you work in? (check all that apply)”

Table 55: Fall 2016 Survey, Question #20

Choice	Response Percent	Response Total
1 Aerospace	2%	31
2 Construction	20%	253
3 Consulting Firms	42%	535
4 Provincial government	5%	67
5 Municipal government	7%	90
6 Health care	2%	28
7 High technology	8%	104
8 Manufacturing	10%	131
9 Marine	4%	52
10 Natural resources	25%	317
11 Utilities	15%	193
12 Other: Please specify	11%	135
Total Respondents		1,277
Total Skipped		23

Question #21: “Are you or your company a member of any of the following associations?”

Table 56: Fall 2016 Survey, Question #21

Choice	Response Percent	Response Total
1 Association of Consulting Engineers of BC (ACEC-BC)	52%	204
2 Association of Mineral Exploration BC (AME BC)	20%	79
3 Structural Engineers Association of BC (SEABC)	21%	83
4 Other: Please specify	26%	102
Total Respondents		389
Total Skipped		911

Question #22: “Are you registered in any other jurisdiction where corporate regulation is in force?”

Table 57: Fall 2016 Survey, Question #22

Choice	Response Percent	Response Total
--------	------------------	----------------

**APEGBC and the Advisory Task Force on Corporate Practice
Consultation Summary Report – Appendix #3**

Choice		Response Percent	Response Total
1	Yes	31%	397
2	No	63%	814
3	Unsure	6%	76
Total Respondents			1,287
Total Skipped			13