
Amendments to the Procedures for the Prescription of Qualifications

Consultation Responses – General Comments

General Comment Responses Received From:

A.	Richard Silver	Solicitors Regulation Authority
B.	David Gloster	RIBA
C.	Humphrey Lloyd QC	Former ARB Board Member
D.	Colin Pugh	Manchester School of Architecture
E.	Julia Dale	University for the Creative Arts
F.	Flora Samuel	University of Sheffield
G.	Leslie Morrison	SCALA
H.	John Stevenson	Oxford Brookes University
I.	Neil Baxter	RIAS

Consultation Questions.

1. Are the Procedures clear and easy to understand in terms of their language and structure? Could they be presented differently or more clearly?

A. Overall the procedures read well and seem to be set out logically. Appendix 6 (on page 37 of the consultation paper) refers to process flow charts that will be inserted post-consultation, and we agree that the inclusion of process charts will help to make the procedures clear and understandable.

At some points the language used is not immediately plain or straightforward – for example on page 13 terms such as ‘*pursuant to*’ and ‘*minded to*’ are used, and there may well be alternative ways of expressing the sentiment of the procedures in simpler language (replacing ‘*pursuant to*’ with ‘*following*’ etc). The procedures would of course be likely to be used mainly by education institutions and members of the profession, but there may still be some scope to simplify some of the language used.

B. Yes; presentation generally clear.

C. Splitting has resulted in some duplication which adds to the length of the document.

D. Yes

E. In terms of language the Procedures are neither very clear nor easy to understand. Over elaborate use of words means that certain points need to be read several times to be understood. One contributing factor is the unnecessary length of sentences; another is the notable Germanic word order used! In summary it is over pedantic in content and should be rationalized – keep it simple and to the point. The structure is reasonable.

F. The Procedures were clear.

G. The procedures are reasonably clear to follow and understand

H. Main procedures and Appendices are clearly written and straightforward. Easy to follow.

I. Procedures are clear.

2. If you are responsible for seeking ARB prescription for an institution's qualifications, do the Procedures introduce any aspects that you could consider particularly onerous?

D. None in the context of existing arrangements – it will be interesting to compare the UK 'aspects' against similar within the EU as we move forward.

F. We did not identify any particularly onerous aspects.

G. SCALA does not seek ARB Prescription.

H. The only question we raise is whether enough time has been provided within the general guidance for the notification process with the EU (your paras 11.5-12.3). This is a matter for you to decide, and inform Schools in due course.

I. The RIAS does not seek prescription for an institution's qualifications.

3. Are there any significant omissions that you believe should be included within the Procedures?

B. Institutions consistently ask that a more defined list of documents for prescription are stated.

C. No

D. On the basis of experience so far – it is clear that these are generally addressed in amendments.

F. We were unable to identify any significant omissions

4. Are there any areas of the Procedures that you believe are ambiguous?

A. We have not identified any ambiguity in the procedures.

C. Yes – see comments

D. The anonymity of independent advisers (see main comments)

E. I think that the sequence of submissions and notifications of an application would be less ambiguous if illustrated in diagrammatic format (or at least supplemented with a diagram). In other words the time frame is initially difficult to grasp.

5. If you are responsible for seeking prescription for an institution's qualifications does ARB's intention to begin using the Procedures for the purposes of prescribing qualifications from the 2010/2011 prescription cycle cause any concern?

E. Yes, Canterbury is due for renewal in 2010 / 2011.

6. Do you have any views on the timing of a review of the proposed Procedures, i.e, should there be a review of the Procedures in 5 years time, to ensure that they remain up to date?

A. The procedures should be re-launched with a commitment to fully revisit and review them after a specified amount of time. 5 years seems a reasonable time period for such a review, although the ARB must be prepared to review individual elements of the procedures on an ad-hoc basis in the event that they are seen to be failing.

B. We believe that the process of constant revision and updating is more valuable at this stage than a root and branch review, even in 5 years time.

C. Every 5 years

D. Procedures should be perpetually under review particularly in the light of the forward landscape of EU notification - `formal` review on a five year cycle suggests that hopefully two review processes could be conducted `under the same rules` - this seems reasonable since changes should be regarded as detailed improvements rather than `new` systems.

E. That would be after only one cycle! However as the whole process takes such a long time perhaps it would be appropriate to start a review in say six years?

F. Yes

G. SCALA would approve of that timeframe.

H. Yes – Particularly regarding the processes referred to in 2) above, based on the experience of the first programmes which are referred through the EU.

I. 5 years max.

7. What are the main equality and diversity issues that are raised by the amended Procedures?

A. It will be important to carry out an equality impact assessment of the revised procedures before they are launched, and to repeat this exercise at regular intervals. This will help to identify any disproportionate impact upon particular individuals or groups being created by the procedures (whether at institution level, at student level, or indeed impact upon members of the regulated community) and allow the ARB an opportunity to fully identify and mitigate the impact.

B. None; revisions represent improved practice.

C. None are raised by the amended Procedures themselves but the amended Procedures, in not defining what is meant by “equality and diversity objectives and policies” (e.g. 1.5.4; 6.7.8), may lead to misunderstandings between an Institution and the Board. In addition it is not clear why securing compliance with such issues is a necessary part of the Board’s statutory duties in relation to qualifications and its role as gate keeper for *individuals* wishing to be registered. What an *institution* does or does not do in relation to “equality and diversity objectives and policies” does not appear to be connected to whether an individual has attained all the criteria. That connection needs to be demonstrated in the Procedures.

D. The inclusion of evidence should rely on institutional policies since architecture schools are diverse and can demonstrate a variety of characteristics within policies that might be overtly similar.

E. It seems appropriate.

F. There are some very serious equality and diversity issues that are caused by the length of architectural education and problems of student debt but putting aside these meta issues we could not identify any issues relating to the procedures.

G. Equality between qualifications of British Architects and those from European Union may be an issue still.

H. Universities will have in place policies which aim to promote equal access to education (including measures to increase widening participation), with ongoing policies covering issues of race, gender and disability, and will monitor, for example, diversity in academic and support staff appointments. Design teaching can reflect cultural diversity through a range of local / global contexts, reinforced by teaching through cultural context studies.

8. In the context of the amended Procedures, do you have any specific comments with regard to how ARB might meet its obligations under equality legislation?

A. The procedures refer to the different stages involved within the consideration process for new qualifications, and at various points reference is made to representations and that these should be in writing. It would be useful here for the procedures to set out some more detail on how representations will work in practice, and for consideration to be given to also allowing oral representations to be made - and if this was the case then the procedures should confirm that in doing so every effort would be made to support those making representations, including offering to make reasonable adjustments as required.

C. Without being told what ARB's obligations are, this question cannot be answered. A reference in the consultation papers to the Board's obligations under equality legislation has not been found. I thought that I might get some assistance from looking at the replies to the comparable question that had been asked in the (closed) consultation on the criteria but although the Board's website says that "Responses to the consultation will be posted here in due course" the Board has evidently decided not to do so, although it has done so in relation to all other recent consultations.

D. ARB is in a position to distribute reliable data since it gathers information across the UK – I'm not sure how it could be `active` - It could comment on equality in its responses to schools though this is clearly not of direct relevance to the competence of graduates unless a causal link could be asserted.

H. The ARB can request evidence of policies and procedures which Schools employ to cover points mentioned above.



Amendments to the Procedures for the Prescription of Qualifications

Consultation Responses – Comments on Draft Procedures

Responses Received From:

- A.** David Gloster RIBA
- B.** Humphrey Lloyd QC Former ARB Board Member
- C.** Julia Dale University for the Creative Arts

Proposed Amendment	Notes	Comments
Foreword The Architects Act 1997 gives the Architects Registration Board the duty of determining who has the legal right to practise as an architect in the UK.		

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<p>Most are registered by the Board because they have a qualification and practical experience that the Board has prescribed. The Board therefore has a statutory duty to set the standards required of some one who wishes to be registered and the prescription of qualifications is therefore central to the Board's work.</p> <p>In 2009 the Board revised its published criteria which set out the minimum levels of awareness, knowledge and ability that students of architecture must acquire at key states in the process of qualifying as an architect. The revised criteria became effective in XXXX and continue to form the basis upon which the Board makes decisions as to whether or not qualifications can be prescribed. Before ARB prescribes a qualification it has to be satisfied that any person to whom it is awarded has and will have met all it criteria at the appropriate level.</p>		<p>C. This should be STAGES</p> <p>C. Delete 'it'</p>

Proposed Amendment	Notes	Comments
<p>The procedures set out in this document describe how from XXXX universities, schools of architecture and other similar institutions that award an architecture degree, diploma, or the like, may apply for and obtain the decision of the ARB as to whether it will be recognised as a prescribed qualification. They replace (from that time) the previous ‘Procedures for the Prescription of Qualifications’ published by ARB in November 2002. The new procedures have been drawn up following consultation with the universities, schools of architecture, the Standing Conference of Heads of Schools of Architecture (SCHOSA), the Association of Professional Studies Advisers (APSAA), the Royal Institute of British Architects (RIBA) and others. The Board is grateful to all those who have participated in the review of the procedures.</p>		<p>C. the Association of Professional Studies Advisers in Architecture (APSAA),</p>

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<p>It is intended that the procedures continue to be simple to operate both from the point of view of the applicant institution and of the ARB. The institution retains the freedom to decide what will best support its application. They continue to enable the institution to get a decision in good time before prescription may start and to meet the ARB before submitting its application to discuss the procedure. They also remain reasonably flexible in order to accommodate the position of individual applicants and, if needed, to allow for adjustments which may particularly be needed in the early years. The newer features of procedures include clarification on the consultation process which applies when qualifications are prescribed for the very first time; clarification of the Board decision making process; information relating to the notification of significant and minor course changes to the Board and the relevant requirements</p>		

Proposed Amendment	Notes	Comments
<p>which stem from the Mutual Recognition of Professional Qualifications Directive (2005/36/EC). Furthermore, adjustments have been made to the standard conditions of prescription which apply once prescription has been granted. The Board's Staff will be happy to provide guidance in relation to any of the revisions.</p> <p>Beatrice Fraenkel Chair, Architects Registration Board XXXX 2010</p>		
<p>Introduction</p> <p>The Architects Act 1997 states in section 4(1)(a) that a person is entitled to be registered if:</p> <p>a) he holds such qualifications and has gained such</p>		

Proposed Amendment	Notes	Comments
<p>practical experience as may be prescribed;</p> <p>or</p> <p>b) he has a standard of competence which in the opinion of the Board, is equivalent to that demonstrated by satisfying paragraph (a).'</p> <p>The Act places on the Architects Registration Board (the Board or the ARB) the responsibility for prescribing the qualifications and practical training experience required for entry onto the UK Register of Architects. The prescription of qualifications is one of the keys to the Board's strategy which is to protect the consumer, support architects through regulation and deliver the Architects Act 1997. The Board publishes criteria, which set out the minimum levels of awareness, knowledge and ability that students of</p>		

Proposed Amendment	Notes	Comments
<p>architecture must acquire at key stages in the process of qualifying as an architect.</p> <p>The underlying framework for the criteria is to be found in Article 46 of the Mutual Recognition of Professional Qualifications Directive (2005/36/EC). The Directive sets out the minimum requirements for the length and core areas of study for architecture qualifications across the European Union. It facilitates mutual recognition of those qualifications and the right of establishment and freedom to provide services across the European Member States. The Board is the UK's Competent Authority for Architects and as such has the responsibility of ensuring that all UK qualifications for the practise of architecture comply with the requirements of the Directive as well notifying the relevant qualifications to the European Commission.</p>		

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<p>These Procedures, which are rules pursuant to section 23(1) of the Architects Act 1997, set out what a university, school of architecture, institution, or similar organisation must do in order to maintain the prescription of a qualification or examination recognised by the Board. In addition, they set out the procedure leading to the prescription of a qualification or examination for the first time (or if there is to be a significant or minor change to the qualification or examination). In such cases the Board has a duty to under section 4(3) of the Act to consult the bodies representative of architects which are incorporated by royal chartered and such other professional and educational bodies as it thinks appropriate. The Board cannot delegate its duties under the Act to prescribe qualifications.</p>		

Proposed Amendment	Notes	Comments
<p>Definitions</p> <p>Unless the context otherwise requires:</p> <ul style="list-style-type: none"> • ‘Application’ includes material submitted in support of it. • ‘The Board’ may include authorised members of the Architects Registration Board and its officers • ‘Criteria’ mean the Board’s criteria current at the relevant time (which may include criteria to come into force during the period of prescription). • ‘Institution’ refers to the university, college or other body that is responsible for a course leading to a qualification. • ‘Notice’ and ‘notify’ means a notice in writing and includes a notice sent electronically. • ‘Prescribed Qualification’ means a qualification 	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>prescribed by the Board under section 4(1)(a) of the Architects Act and 'prescribe' has the same meaning as that used in the Act.</p> <ul style="list-style-type: none"> • 'Prescription' includes the process by which qualifications are prescribed by the Board (the prescription of qualifications) and the result, namely that which a qualification obtains if it is prescribed by the Board under the Architects Act 1997 (thus a qualification 'has', 'gains' or 'loses' prescription). • 'The Profession' refers to those on the Register of Architects. • 'Programme specification', as defined by the Quality Assurance Agency, is a concise description of the intended outcomes of learning from a higher education programme, and the means by which these outcomes are achieved and demonstrated. These typically include the 		

Proposed Amendment	Notes	Comments
<p>educational aims of the programme; the intended learning outcomes; strategies for teaching; learning and assessment; and an outline of the structure of the course.</p> <ul style="list-style-type: none"> • ‘Qualification’ includes an examination or assessment and, where appropriate, refers to first degrees, second degrees and diplomas, and professional practice examinations designated as Parts 1, 2 and 3 in the Board’s criteria for the prescription of qualifications. • ‘School’ refers to the academic unit within an institution that is responsible to it for the conduct of the course. A school may be an institution. 		
<p>Principles</p> <p>The procedure is based on these cardinal principles:</p>	<p>There are no proposed</p>	

Proposed Amendment	Notes	Comments
<p>a) The Board will make its decision on the basis of the material submitted with the application (and such other material that the institution or school supplies at the request of the Board);</p> <p>b) The institution is free to decide what material it considers justifies its application.</p> <p>The Board will provide guidelines as to what material it expects to be provided (see ARB's Good Practice Handbook: http://www.arb.org.uk/education/handbooks/good-practice/).</p>	<p>changes to this section.</p>	
<p>Applying for Prescription of a New Qualification</p> <ul style="list-style-type: none"> - Qualifications for which ARB Prescription has never been sought before 	<p>Proposed changes to separate out the process for applying for prescription of a</p>	

Proposed Amendment	Notes	Comments
<ul style="list-style-type: none"> - Currently prescribed qualifications that have been subject to major modification in terms of structure and content. 	<p>new qualification from that of applying to renew prescription.</p>	
<p>Notifying the Board of an intention to apply</p> <p>1.0 An institution which intends to apply for the prescription of a qualification should request a planning meeting with ARB, up to twelve months before applying, in order to gain a clear understanding of the steps that should be taken by it prior to the submission of the application. At that meeting the institution should be represented by those who are responsible for the preparation and submission of the application and for the assembly of material to support it. A relevant member of the institution's Quality Assurance staff, or faculty equivalent, should also be present. The purpose of the meeting is to discuss the procedure to be</p>	<p>Proposed changes to allow for planning meetings to take place up to twelve months before prescription is applied for.</p>	<p>A. The proposal represents good practice</p>

Proposed Amendment	Notes	Comments
<p>followed by the Institution before submitting its application for prescription, how the application will be considered by the Board, and what occurs when prescription is granted. The Board will not provide advice or guidance on the content of the application or of any supporting material as this is solely for the institution to decide (see paragraph 1.6). The meeting will be informal. No pre-application communication is to be relied upon to vitiate any part of the prescription procedure itself.</p>		
<p>1.1 An institution must notify the Board of its intention to apply for the prescription of a qualification</p> <ul style="list-style-type: none"> • not less than 12 months • and no longer than 18 months <p>before the date from which prescription of the qualification is to begin.</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>1.2 The notification should be in writing and must include the following:</p> <ul style="list-style-type: none"> • Details of the title, length and mode of the qualification; • The up-to-date programme specification for the qualification; • The date on which the Board should expect to receive the full application (which must be within 8 weeks of the date on which the notification letter is received by the Board); and • Any other information that is material to the application in accordance with these procedures. 	<p>Proposals for minor changes to this section to allow institutions to submit any other information that is material to the application at the point of notification.</p>	
Submitting the application		

Proposed Amendment	Notes	Comments
<p>1.3 The institution will submit its application to the Board within 8 weeks of the date of the notice given under paragraph 1.2 above. A school may submit an application on behalf of an institution provided that it is accompanied by the appropriate written authorisation from the institution. The application must be submitted either in hard copy, or electronically. [From January 2011 the Board will only accept electronic submissions.] Amongst other things, the institution must specify the dates for which prescription is sought, as well as a date by which it wishes to make its annual monitoring submission each year once prescription has been granted (see Appendix 2).</p>	<p>There are no proposed changes to this section.</p>	
<p>Objectives – Prescription of a New Qualification</p>		

Proposed Amendment	Notes	Comments
<p>1.4 When applying for a new qualification to be prescribed, an institution should bear in mind that in order for the Board to prescribe a new qualification, the institution and the Board must be confident that:</p> <ol style="list-style-type: none"> 1. the course proposal, including the educational aims, the intended learning outcomes, the assessment criteria etc, have been designed with the clear aim of ensuring that all those who receive the qualification meet all the criteria; 2. systems are in place to ensure that all criteria will be met by all students/candidates receiving the qualification for the period of prescription; 3. the institution has adequate resources to maintain and, where appropriate, increase the achievements of students meeting all the criteria. 	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>1.5 When considering an application for the prescription of a new qualification, the Board will consider whether certain factors are demonstrated within the application. These will include the following:</p> <ol style="list-style-type: none"> 1. That explicit strategies and mechanisms for assessing students/candidates are proposed to ensure that the criteria will be achieved 2. That the institution has appropriately qualified staff to deliver the course and assess students/candidates 3. That appropriate mechanisms will exist to ensure that the appointment, development and leadership of staff and examiners (including external examiners) is in accordance with best 	<p>Section 1.5.4 is proposed as an additional factor that will need to be demonstrated within an application.</p>	<p>A. '2' raises issue of how staff might be considered to be appropriately qualified...</p>

Proposed Amendment	Notes	Comments
<p>practice and takes account of the vocational, as well as the academic, aspect of the qualification</p> <p>4. That appropriate mechanisms will exist to ensure that equality and diversity objectives and policies are taken into account and are adequate</p> <p>5. That there will be an engagement with the profession, which will be ongoing during the period of prescription, in the delivery of the course and the assessment of students/candidates</p> <p>6. That strategies and mechanisms of assessment will be subject to both internal and external periodic review and audit</p> <p>7. That assessments will be rigorously monitored for consistency and benchmarked for comparability with other institutions offering prescribed qualifications</p> <p>8. That mechanisms will exist to allow the</p>		

Proposed Amendment	Notes	Comments
<p>institution to appropriately respond to problems identified by benchmarking, review and audit processes</p> <p>9. That internal and external review and audit processes will be rigorous and that, in their implementation, steps will be taken to ensure that they take account of the vocational, as well as the academic, aspect of the qualification</p> <p>10. That the institution will have during the period of prescription adequate resources</p> <p>11. That the institution is committed to maintaining and, where appropriate, enhancing its provision relating to the matters listed above for the future period of prescription.</p>		<p>C. WORD ORDER:- That the institution will have adequate resources during the period of prescription</p>
<p>Material to be Submitted with an Application</p> <p>1.6 It is the responsibility of institutions to provide</p>	<p>It is proposed that the guidance referring to the</p>	

Proposed Amendment	Notes	Comments
<p>the Board with the relevant evidence to justify prescription. The material must be the latest available. Student portfolios or other student work should not be submitted with an application. For an outline of the types of information typically submitted as part of an application, institutions may wish to refer to ARB's Good Practice Handbook: http://www.arb.org.uk/education/handbooks/good-practice/.</p>	<p>types of material an institution may wish to submit, as noted in Appendix 3 of the existing Procedures, is replaced by this section.</p>	
<p>1.7 The material submitted must address the objectives and factors set out in paragraphs 1.4 and 1.5 above, as they will inform the Board's consideration of and decision on the application. In considering the above factors, the Board will not undertake an audit of an institution's systems and processes. However, it will take into account audits undertaken by other bodies.</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>1.8 The guidance given in ARB’s Good Practice Handbook is not intended to restrict the institution from submitting other information that it may consider helpful in helping the Board to have confidence that the objectives in paragraphs 1.4 and 1.5 are being met. The institution is free to decide what information justifies its application for prescription. The institution may also wish to refer to ARB’s Good Practice Handbook (http://www.arb.org.uk/education/handbooks/good-practice/) which contains a list of derived questions used by the Board to analyse an institution’s application.</p>	<p>Proposals for minor changes to this section to provide institutions with additional guidance in preparing their applications for prescription.</p>	
<p>1.9 When providing reports from examiners, agencies and advisers as evidence, institutions should also provide details of the procedures,</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>methodologies, criteria and personnel underpinning the reports (where these are not given as part of the material already provided), so that the Board can give such reports due weight and relevance.</p>		
<p>2.0 Once an institution has submitted a full application, it may not amend, or add to, the application (unless the Prescription Committee and/or Board in writing requests or permits further explanation/s and/or representations in relation to the application).</p>	<p>There are no proposed changes to this section.</p>	<p>C. WORD ORDER:- (unless the Prescription Committee and/or Board requests in writing</p>
<p>School Approval of the Application</p> <p>2.1 The application must be addressed to the Chief Executive of the Board and must be submitted by or on behalf of the institution in the Board’s form. If the</p>	<p>Proposals for minor change to this section to allow institutions to provide details of a second contact where appropriate.</p>	

Proposed Amendment	Notes	Comments
<p>application is not submitted by the school responsible for the course leading to the qualification the school must certify that the application and all supporting material has been seen and approved by the head of that school. If the application is submitted by a school on behalf of the institution a name and address for communication must be provided, as thereafter the Board will only communicate with that person who will be deemed to have complete authority on behalf of the institution to act on its behalf for all purposes connected with the application and the qualification. Should the institution wish to nominate a second contact (with whom the Board will communicate in the event of the absence of the primary contact), it may do so.</p>		
<p>2.2 Please see</p>		<p>A. Good Practice</p>

Proposed Amendment	Notes	Comments
<p>http://www.arb.org.uk/education/prescription-application-procedure.shtml for an electronic version of ARB's application form and guidance on completing this document.</p>	<p>New section to provide institutions with additional guidance in preparing and submitting their applications for prescription.</p>	<p>C. Please refer to:-</p>
<p>Initial Scrutiny</p> <p>2.3 The application will first be considered by ARB's staff, who may examine it to see that the Board has all the information and material that the institution intends it to have. If the staff consider that anything may be missing the Board may notify the institution. This will normally be within 3 weeks. The institution will have 14 days to supply what is missing or to notify the Board that it does not intend to do so and explain why. The staff will not otherwise at this stage be scrutinising the application for content. Neither at this nor at any other stage will the Board owe any duty to notify the institution of anything that is</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
lacking in the application or that is unclear in it.		
<p>The Board's Prescription Committee</p> <p>2.4 The Board has established a Prescription Committee to oversee the stages of this procedure up to submission to the Board. The membership should consist of the following:</p> <ul style="list-style-type: none"> • At least 4 members drawn from the ARB Board; plus • A further appointed member drawn from the ARB Board to act as Chair; plus • A member of the Committee's Pool of Independent Advisers 	<p>The membership of the Prescription Committee was amended by the Board at its meeting of 12 February 2009. The proposed changes to this section reflect the revised membership as approved by the Board.</p>	
<p>2.5 The Committee may add further persons drawn from the Pool of Independent Advisers to the membership of the Committee. The members of the ARB Board sitting on the Committee (including</p>	<p>The membership of the Prescription Committee was amended by the Board at its meeting of 12 February 2009. The proposed changes to this section reflect the revised</p>	

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the Chair) will be no less than 3 appointed and 2 elected members of the ARB Board.	membership as approved by the Board.	
2.6 The Committee acts in an advisory capacity, as the Board alone decides whether qualifications are prescribed.	Proposed new section to clarify the role of the Committee within the process.	
2.7 Within 8 weeks of the receipt of an application the Committee will advise whether the application should be considered by the Board or whether, before it is submitted to the Board, there are any aspects of the application or the material in support upon which further explanation is required from the institution or advice is needed.	There are no proposed changes to this section.	
2.8 If an explanation is required, the Prescription Committee will notify the institution of the points upon which an explanation is required. Any	There are no proposed changes to this section.	

Proposed Amendment	Notes	Comments
<p>explanation must be provided in writing within 3 weeks. Student portfolios or other student work must not be submitted with an explanation unless the committee (or the Board at any later stage) has specifically required them and then only to the extent specified.</p>		
<p>2.9 If advice is needed on an application, the Prescription Committee can seek advice on the points upon which an explanation is required from its pool of Independent Advisers. The pool consists of people who are impartial and suitably qualified to advise the Board. Details of the Board's current pool of Independent Advisers can be found at the following link: http://www.arb.org.uk/about/advisers-to-the-prescription-committee.shtml. The advice and the terms of reference seeking the advice will be in</p>	<p>Proposals for minor changes to this section to allow institutions to clarify the process which takes place should the Committee seek the advice of one of its Independent Advisers.</p>	

Proposed Amendment	Notes	Comments
<p>writing. The Adviser/s will be given 3 weeks within which to provide the advice. The advice will then be given to the institution for comment. If the institution has any comments on the advice or if, in the light of the advice, it wishes to explain or supplement its application with additional material it must submit such comments and material within 3 weeks of receiving the advice. Once the institution has commented, the Adviser will be asked to confirm whether they are satisfied with the institution's response. All of this information will be provided to the Prescription Committee and the Board. To maintain impartiality, the identity of the Independent Adviser used will remain anonymous to the institution concerned.</p>		
<p>3.0 The Committee may in exceptional circumstances seek further explanations and/or</p>	<p>Proposals for minor changes to allow more flexibility in the Committee's approach to</p>	

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<p>advice. If further explanations and/or advice are sought, the above procedure will be repeated, except that the Committee may shorten any applicable period. Further explanations should be sought in writing; however, the Committee may seek explanations orally, in appropriate cases.</p>	<p>seeking explanations.</p>	<p>B. How are oral explanations to reach the Board which is to decide only on written material?</p>
<p>3.1 Exceptionally, but where it considers it necessary and appropriate, the Committee may require additional relevant information to be provided by an institution during the course of a visit to the institution by such independent advisers as the Committee may nominate.</p>	<p>New section to provide flexibility within the process where the need arises.</p>	<p>B. 1 From the Pool of Independent Advisers or some other (wider) source? 2. See Comment on 3.0 for information provided to advisers. Since advisers will inevitably exercise judgment in the transmission of such information, how is the Board to be sure that it receives the information that the institution actually provided. Will the institution have sight of the advisers' communications to and with the Board? 3. The provision for a visit conflicts with the cardinal principle of decisions being made solely on the basis of the material provided by the institution or requested by the Board. The information will be provided at the request of an adviser independent of the Board.</p>
<p>3. 2 Following receipt of all explanations or advice</p>	<p>There are no proposed</p>	

Proposed Amendment	Notes	Comments
<p>the Committee will refer the application to the Board. The Board will not generally consider any application unless it has been referred to it by the Committee.</p>	<p>changes to this section.</p>	
<p>3.3 The institution is entitled to have sight of the papers which are to be presented to the Board for decision following the Committee’s consideration of the application. The institution will have the opportunity to make representations on the paper and to offer comments on accuracy. It must provide any such comments within 14 days of receiving the papers. In exceptional circumstances, the Prescription Committee may permit a longer period in which the institution may respond. The institution’s comments will be presented to the Board alongside the application.</p>	<p>New section to promote greater transparency within the process.</p>	

Proposed Amendment	Notes	Comments
<p>The Board's Preliminary Consideration of a New Qualification</p> <p>3.4 Once received, the Board will consider the application, along with any explanations, advice and comments. At this stage, the Board will not make a formal decision in relation to the application. The Board will provide an indication as to the decision it is 'minded' to make, and this will be subject to the subsequent consultation (as required by section 4(3) of the Act) and any representations made by the institution in accordance with the procedure set out below.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>3.5 Stage 1</p> <p>At this stage, the Board will indicate that it is minded either:</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	<p>B. "Qualified Approval" is not understood. How is it authorised by the Act? It is not prescription since that is (a) "to accept the application and to prescribe the qualification..". Under (b) it is something different "to accept the application and give a 'Qualified Approval'". But the application was for prescription. How can it</p>

Proposed Amendment	Notes	Comments
<p>a) to accept the application and to prescribe the qualification or qualifications as sought by the institution; or</p> <p>b) to accept the application and give a ‘Qualified Approval’, which denotes either:</p> <p>(i) not granting prescription to all of the qualifications for which prescription is sought; and/or</p> <p>(ii) attaching special conditions, and/or</p> <p>(iii) prescribing for a period of less than four years; or</p> <p>c) to reject the application.</p> <p>If pursuant to Stage 1 the Board indicates that it is minded to either:</p>		<p>both be accepted and yet not result in prescription? The Standard Conditions only apply to prescription (see 5.5 and 9.0); they do not apply to “Qualified Approval” Does the Board “approve” applications?</p> <p>Surely it would be better to say only :</p> <p>1. Where prescription of more than one qualification is sought the Board may accept an application in part (i.e. (i)) and prescribe only one (or more) of the qualifications sought.</p> <p>2. In any case the Board may prescribe a period of less than 4 years.</p> <p>It is not necessary to say anything about attaching special conditions” since the power to do so is in paras 6.0 (and 9.6).</p> <p>[These comments apply to other comparable paragraphs both in relation to new qualifications and renewals]</p>

Proposed Amendment	Notes	Comments
<p>a) reject the application; or b) give a Qualified Approval;</p> <p>it will not take such a decision without first providing written reasons for the indication to the institution and giving the institution the opportunity to make representations in writing to the Board. Any representations must be received by the Board within 4 weeks.</p>		
<p>3.6 If, at Stage 1, the Board is minded to accept the application and prescribe the qualifications sought, the Board will proceed directly to consultation pursuant to paragraph 4.5 below (and Stages 2 and 3 will not apply).</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>3.7 Stage 2</p>	<p>Proposals for minor changes to this section to clarify the</p>	

Proposed Amendment	Notes	Comments
On receipt of any Stage 1 representations the Board will reconsider its position.	Board's decision-making process.	
3.8 If, as a result of any representations the Board is then minded to alter its stated position and prescribe a qualification as initially requested by the institution, the Board will conduct its consultation pursuant to paragraph 4.5 below and Stage 3 will not apply.	Proposals for minor changes to this section to clarify the Board's decision-making process.	
3.9 If, as a result of any representations the Board is still minded to grant Qualified Approval, the Board will conduct its consultation pursuant to paragraph 4.5 below and Stage 3 will not apply. However, in this circumstance, the Board will not conduct its consultation without first giving the institution the opportunity to defer the consultation pending further representations. The institution will have 14 days to	Proposals for minor changes to this section to clarify the Board's decision-making process.	

Proposed Amendment	Notes	Comments
<p>submit such representations.</p> <p>If:</p> <ul style="list-style-type: none"> a) the institution requests that the consultation is so deferred; or b) the Board, after reconsidering its position following receipt of any Stage 1 representations, is minded to reject the application; <p>the Board will consider further representations, and on such terms, as it considers appropriate.</p>		
<p>4.0 If no Stage 2 representations are received, the Board may, in accordance with its indication under Stage 1, either reject the application or proceed to consultation on the basis that it is minded to grant Qualified Approval. If the Board rejects the</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	

Proposed Amendment	Notes	Comments
<p>application, the provisions of paragraphs 4.2 below will apply. If the Board is minded to grant Qualified Approval, the Board will proceed to consultation in accordance with paragraph 4.5 below, except that the institution will be given the opportunity to withdraw its application before the consultation starts. The institution will have 14 days in which to withdraw its application.</p>		
<p>4.1 Stage 3</p> <p>If, on receipt and consideration of any Stage 2 representations (or if no Stage 2 representations are received), the application is rejected by the Board, it will within three weeks of its meeting notify the institution of the reasons for its decision. Where appropriate, the Board's reasons will indicate which of its criteria and/or objectives have not been or</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	

Proposed Amendment	Notes	Comments
<p>may not be met, but the reasons will not include any advice on any remedial or other action that should be taken as the institution will have to decide what it should do if it chooses to submit another application.</p>		
<p>4.2 If the Board rejects an application, an institution can re-apply at any time.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>4.3 If, on receipt and consideration of any Stage 2 representations, the Board is minded to accept the application and prescribe the qualifications sought, the Board will proceed to consultation in accordance with paragraph 4.5 below.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>4.4 If, on receipt and consideration of any Stage 2 representations (or if no Stage 2 Representations</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making</p>	

Proposed Amendment	Notes	Comments
<p>are received), the Board is minded to grant Qualified Approval, the Board will proceed to consultation in accordance with paragraph 4.5 below, except that the institution will be given the opportunity to withdraw its application before the consultation starts. The institution will have 14 days in which to withdraw its application.</p>	<p>process.</p>	
<p>Consultation</p> <p>4.5 Before prescribing a new qualification the Board is required, under Section 4(3) of the Architects Act 1997, to consult bodies representative of architects which are incorporated by royal charter and such other professional and educational bodies as it thinks appropriate.</p>	<p>New section to clarify the Board's consultation process.</p>	
<p>4.6 ARB typically consults with the Royal Institute of</p>	<p>New section to clarify the</p>	

Proposed Amendment	Notes	Comments
<p>British Architects, the Royal Institute of Architects in Scotland, the Royal Society of Architects in Wales, the Royal Society of Ulster Architects, the relevant RIBA Region (if different from above) and the Association of Consultant Architects. Should an institution wish to make suggestions in relation to any additional bodies with whom the Board may wish to consult, it should state these in the Board's application form.</p>	<p>Board's consultation process.</p>	<p>A. Consultation with RIBA welcomed</p>
<p>4. 7 The Board will provide consultees with the details of its stated position, i.e., the decision it is 'minded' to make in relation to the application and the reasons for its stated position. The Board will also provide consultees with a copy of its Procedures for the Prescription of Qualifications, the Criteria for Prescription and information provided by the institution which describes the qualification.</p>	<p>New section to clarify the Board's consultation process.</p>	

Proposed Amendment	Notes	Comments
<p>4.8 The Board will normally offer consultees the opportunity of responding to its consultation within 12 weeks. However, in order that the institution applying for prescription receives a timely decision the Board may ask consultees to respond within a shorter timeframe.</p>	<p>New section to clarify the Board's consultation process.</p>	
<p>4.9 A copy of any response that is submitted by a consultee will be provided to the institution. The institution will have the opportunity of submitting any final comments or representations to the Board in respect of the consultation response before the Board reaches its final decision. The Board normally offers an institution the opportunity of responding within 3 weeks of provision of a copy of a consultee's response. However, in order that the institution applying for prescription can receive a</p>	<p>New section to clarify the Board's consultation process.</p>	

Proposed Amendment	Notes	Comments
<p>timely decision, the Board may ask the institution to respond within a shorter timeframe.</p>		
<p>The Board's Final Decision (Where a consultation has been conducted)</p> <p>5.0 Once all of the consultation responses and any further representations from the institution have been received, all of this information will be considered by the Prescription Committee. Once the Prescription Committee is satisfied that no further clarification and/or explanation is required in relation to the material, it will forward the application to the Board, which will make a final decision to either accept or reject the application, or grant Qualified Approval.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>5.1 If the application is rejected by the Board, it will within 3 weeks of its meeting notify the institution of</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making</p>	<p>C. WORD ORDER:- it will notify the institution of the reasons for its</p>

Proposed Amendment	Notes	Comments
<p>the reasons for its decision. Where appropriate, the Board's reasons will indicate which of its criteria and/or objectives have not been or may not be met but they will not include any advice on any remedial or other action that should be taken as the institution will have to decide what it should do if it chooses to submit another application.</p>	<p>process.</p>	<p>decision within 3 weeks of its meeting.</p>
<p>5.2 A decision to accept or reject any application, or grant any application a Qualified Approval, will be final (including any decision on any period or condition), and there will be no appeal.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>5.3 In case of rejection or Qualified Approval the institution may make another application in accordance with this procedure. An institution can re apply at any time.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	

Proposed Amendment	Notes	Comments
<p>5.4 In addition, in exceptional circumstances, the Board will be entitled to reconsider any decision to reject an application or, where it prescribed a qualification, as to the period or conditions applicable, should it become aware of any material which was not available to it at the date of its decision. The Board will determine the procedure to be adopted in order to consider such material and to reconsider its decision. Unless and until the decision is reconsidered the Board's decision will be unaffected and will remain binding.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
<p>Standard Conditions of Prescription</p> <p>5.5 Prescription of a qualification will be subject to the following standard conditions:</p> <p>a) The period of prescription shall commence on a date to be decided by the Board (normally the</p>	<p>Proposed amendments to Standard Condition (c), which has been expanded to take account of requirements under the Mutual Recognition of Professional Qualifications Directive [2005/36/EC]; new Standard Condition (d) to reflect individuals' EU Treaty</p>	<p>B. As already noted standard conditions do not apply to "Qualified Approval"</p>

Proposed Amendment	Notes	Comments
<p>beginning of the academic year).</p> <p>b) Prescription of a qualification shall be by reference to a programme specification. No change may be made to the title of any course or qualification or substantial change to the content so defined within a programme specification (allowing for normal course development) without first obtaining the written permission of the Board. (For further information on changes to qualifications, refer to Appendix 3.)</p> <p>c) Annually and by a date to be set by the Board, the institution shall be required to provide the Board with information of the nature set out in Appendix 2 to enable the Board to see that a. all its criteria and the relevant requirements set out</p>	<p>rights.</p>	<p>C. Section 5.5 already has parts a) b) c) and d) – so these sub-sections are confusing.</p> <p>The sub-sections should be differentiated from the main sections by using lower</p>

Proposed Amendment	Notes	Comments
<p>in Article 46 (or Article 47) of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC] are being attained by students who have been awarded the qualification prescribed; b. adequate systems are in place to ensure that all the Board's criteria will be met by students/candidates for the period of prescription; c. that the institution's resources remain as set out in its application and are adequate; and d. all of the factors referred to at paragraph 1.4 and 1.5 continue to be demonstrated.</p> <p>d) The institution will ensure that appropriate procedures will be maintained so that all students undertaking a prescribed qualification are fully informed of the extent of the application of that qualification to entitlement to registration as an architect in circumstances in which the</p>		<p>case Roman numerals:- i), ii), iii), and iv).</p>

Proposed Amendment	Notes	Comments
<p>student lacks a required antecedent qualification e.g. Part 2 without Part 1 .</p>		
<p>5.6 If as a result of the information provided under (c) above or from any source at any time (please see Appendix 4 for the Board's Causes for Concern process), the Board considers that either</p> <p>a) the application or any of the material relied on by the institution in support (including explanations given) was</p> <ul style="list-style-type: none"> i. untrue and/or ii. was misleading in a material respect as a result of which the Board might not have accepted the application; or <p>b) criteria or the relevant requirements set out in</p>	<p>Proposals for minor changes to this section to reflect changes to the Standard Conditions of Prescription (see 5.5).</p>	

Proposed Amendment	Notes	Comments
<p>Article 46 (or Article 47) of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC] are not being met by students awarded the prescribed qualification; or</p> <p>c) the institution does not have the resources stated in its application and/or its resources are not adequate; or</p> <p>d) the institution has not complied with any of the conditions set out in paragraph 5.5 and (c) above or any other condition made under paragraph 5.8 below;</p> <p>then the Board may notify the institution that it is of the opinion that the prescription should be revoked in whole or in part, together with its reasons for that opinion. The institution will within 3 weeks (or such</p>		

Proposed Amendment	Notes	Comments
<p>varied period as the Board may allow) make any representation in writing to the Board as to why it should not so act. On receipt of such representations (and taking account of any representations submitted to it by any other body, whether or not the Board shall be obliged in law to consult it) the Board will decide within 4 weeks whether or not to revoke the prescription of the qualification in whole or in part. If it does so the revocation will not affect the validity of the qualification awarded prior to the revocation. The institution may make an application in accordance with these Procedures for prescription of the qualification whose prescription has been revoked.</p>		
<p>5.7 The above provisions will not prevent the Board from entering into discussions with the institution in order to avert the need for a decision to revoke</p>	<p>New section to promote greater flexibility within the process.</p>	

Proposed Amendment	Notes	Comments
prescription.		
5.8 Exceptionally, but where it considers it necessary and appropriate, the Board may require additional relevant information to be provided by an institution during the course of a visit to the institution by such independent advisers as the Board may nominate.	New section to promote greater flexibility within the process.	
5.9 Where any of the events set out in paragraph 5.6 above have occurred or are present and the circumstances require urgent action the Board may by notice to the institution revoke the prescription with immediate effect.	Proposals for minor changes to this section to reflect changes to Section 5.6.	
6.0 Where in the opinion of the Board it is appropriate, the Board may vary any of the standard conditions and may make prescription of a	There are no proposed changes to this section.	

Proposed Amendment	Notes	Comments
qualification subject to other conditions.		
<p>Notification of a New Qualification to the European Commission</p> <p>6. 1 Under the terms of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC], any new qualification that is prescribed by ARB will be notified to the European Commission. The procedure for notifying a qualification to the European Commission can be found under Appendix 5.</p>	<p>New section to reflect ARB's role as the UK's Competent Authority for Architects.</p>	<p>A. Will RIBA automatically be informed of additions / change to EC list?</p>
<p>Applying to Renew Prescription of a Qualification</p> <p>Qualifications which are currently prescribed by ARB.</p>	<p>Proposed amendment to separate out the process for applying for prescription of a new qualification from that of applying to renew prescription.</p>	

Proposed Amendment	Notes	Comments
<p>Notifying the Board of an intention to apply</p> <p>An institution which intends to apply for the prescription of a qualification should request a planning meeting with ARB, up to twelve months before applying, in order to gain a clear understanding of the steps that should be taken by it prior to the submission of the application. At that meeting the institution should be represented by those who are responsible for the preparation and submission of the application and for the assembly of material to support it. A relevant member of the institution's Quality Assurance staff, or faculty equivalent, should also be present. The purpose of the meeting is to discuss the procedure to be followed by the Institution before submitting its application for prescription, how the application will be considered by the Board, and what occurs when prescription is granted. The Board will not provide</p>	<p>Proposed amendment to the existing Procedures to allow for planning meetings to take place up to twelve months before prescription is applied for.</p>	

Proposed Amendment	Notes	Comments
<p>advice or guidance on the content of the application or of any supporting material as this is solely for the institution to decide (see 6.8). The meeting will be informal. No pre-application communication is to be relied upon to vitiate any part of the prescription procedure itself.</p>		
<p>6.3 An institution must notify the Board of its intention to apply for the prescription of a qualification</p> <ul style="list-style-type: none"> • not less than 12 months • and no longer than 18 months <p>before the date by which the existing prescription period expires.</p>	<p>There are no proposed changes to this section.</p>	
<p>6.4 The notification should be in writing and must include the following:</p>	<p>Proposals for minor changes to require institutions</p>	

Proposed Amendment	Notes	Comments
<ul style="list-style-type: none"> • Details of the title, length and mode of the qualification; • An up to date Programme Specification for the qualification; • The date on which the Board should expect to receive the full application (which must be within 8 weeks of the date on which the notification letter is received by the Board); • Any other information that is material to the application in accordance with these Procedures. 	<p>renewing prescription to provide an up to date programme specification and to allow institutions to submit any other information that is material to the application at the point of notification.</p>	
<p>Submitting the application</p> <p>6.5 The institution will submit its application to the Board within 8 weeks of the date of the notice given under paragraph 6.3 above. A school may submit an application on behalf of an institution provided that it is accompanied by the appropriate written</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>authorisation from the institution. The application will be submitted either in hard copy, or electronically. [From January 2011 ARB will only accept electronic submissions.] Amongst other things, the institution must specify the dates for which prescription is sought, as well as a date by which it wishes to make its annual monitoring submission each year once prescription has been granted (see Appendix 2).</p>		
<p>Objectives - Renewal of Prescription</p> <p>6.6 An institution should bear in mind that, in order for the Board to prescribe a qualification that has previously been prescribed, the institution and the Board must be confident that:</p> <ol style="list-style-type: none"> 1. All students/candidates awarded the qualification since the qualification was 	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
<p>prescribed or last renewed have met all the criteria;</p> <p>2. The systems used by the institution to ensure that all students/candidates awarded the qualification have met all the criteria are adequate and will continue to ensure that the criteria are met for the future period of prescription;</p> <p>The institution's future plans and commitment are such that the institution will maintain its ability to ensure that all students/candidates awarded the qualification meet all the criteria.</p>		<p>C. Grammar? the systems used.... have met all the criteria adequately and.....</p>
<p>6.7 When considering such an application for prescription the Board will consider whether certain factors are demonstrated in the application. These</p>	<p>Section 6.7.8 is proposed as an additional factor that will need to be demonstrated within an application.</p>	

Proposed Amendment	Notes	Comments
<p>may include the following, or may include any other which the institution suggests, and the Board agrees, should be considered in support of its application:</p> <ol style="list-style-type: none"> 1. That explicit strategies and mechanisms for assessing students/candidates have existed to ensure that the relevant criteria have been achieved. 2. That these strategies and mechanisms of assessment have been subject to both internal and external periodic review and audit and been found to be adequate. 3. That assessments have been rigorously monitored for consistency and benchmarked for comparability with other institutions offering prescribed qualifications and been found to be adequate (e.g. by external examiners). 		

Proposed Amendment	Notes	Comments
<p>4. That the institution has appropriately responded to problems identified by benchmarking, review and audit processes.</p> <p>5. That internal and external review and audit processes have been rigorous and that, in their implementation, steps have been taken to ensure that they take account of the vocational, as well as the academic, aspect of the qualification.</p> <p>6. That appropriate mechanisms exist to ensure that the appointment, development and leadership of staff and examiners (including external examiners) is in accordance with best practice and has taken account of the vocational, as well as the academic, aspect of the qualification.</p> <p>7. That the vocational aspects of the qualification are accepted as satisfactory by architects in</p>		

Proposed Amendment	Notes	Comments
<p>practice.</p> <p>8. That appropriate mechanisms will exist to ensure that equality and diversity objectives and policies are taken into account and are adequate</p> <p>9. That the institution has adequate resources and during the future period of prescription will continue to have adequate resources.</p> <p>That the institution is committed to maintaining and, where appropriate, enhancing its provision relating to the matters listed above for the future period of prescription.</p>		
<p>Material to be Submitted with an Application</p> <p>6.9 It is the responsibility of institutions to provide the Board with the relevant evidence to justify prescription. The material must be the latest available. Student portfolios or other student work</p>	<p>It is proposed that the guidance referring to the types of material an institution may wish to submit, as noted in Appendix 1 of the existing Procedures is replaced by</p>	

Proposed Amendment	Notes	Comments
<p>should not be submitted with an application. For an outline of the types of information typically submitted as part of an application, institutions may wish to refer to ARB's Good Practice Handbook: http://www.arb.org.uk/education/handbooks/good-practice/.</p>	<p>this section.</p>	
<p>6.8 The material submitted must address the objectives and factors set out in paragraphs 6.6 and 6.7 above, as they will inform the Board's consideration of and decision on the application. In considering the above factors, the Board will not undertake an audit of an institution's systems and processes. However, it will take into account audits undertaken by other bodies.</p>	<p>There are no proposed changes to this section.</p>	
<p>7.0 The guidance given on ARB's Good Practice Handbook is not intended to restrict the institution</p>	<p>Proposals for minor changes to this section to provide institutions with additional</p>	

Proposed Amendment	Notes	Comments
<p>from submitting other information that it may consider helpful in helping the Board to have confidence that the objectives in paragraphs 6.6 and 6.7 are being met. The institution is free to decide what information justifies its application for prescription. The Institution may also wish to refer to ARB's Good Practice Handbook (http://www.arb.org.uk/education/handbooks/good-practice/) which contains a list of derived questions used by the Board to analyse an institution's application.</p>	<p>guidance in preparing their applications for prescription.</p>	
<p>7.1 When providing reports from examiners, agencies and advisers as evidence, institutions should also provide details of the procedures, methodologies, criteria and personnel underpinning the reports (where these are not given as part of the material already provided), so that the Board can</p>	<p>There are no proposed changes to this section.</p>	

Proposed Amendment	Notes	Comments
give such reports due weight and relevance.		
<p>7.2 Once an institution has submitted a full application, it may not amend, or add to, the application (unless the Prescription Committee and/or Board in writing requests or permits further explanation/s and/or representations in relation to the application).</p>	<p>There are no proposed changes to this section.</p>	<p>C. WORD ORDER:- and/or Board requests in writing</p>
<p>School Approval of the Application</p> <p>7.3 The application must be addressed to the Chief Executive of the Board and must be submitted by or on behalf of the institution in the Board's form. If the application is not submitted by the school responsible for the course leading to the qualification the school must certify that the application and all supporting material has been seen and approved by the head of that school. If the</p>	<p>Proposals for minor change to this section to allow institutions to provide details of a second contact where appropriate.</p>	

Proposed Amendment	Notes	Comments
<p>application is submitted by a school on behalf of the institution a name and address for communication must be provided as thereafter the Board will only communicate with that person who will be deemed to have complete authority on behalf of the institution to act on its behalf for all purposes connected with the application and the qualification. Should the institution wish nominate a second contact (with whom the Board will communicate in the absences of the primary contact) it may do so.</p>		
<p>7.4 Please see http://www.arb.org.uk/education/prescription-application-procedure.shtml for an electronic version of ARB's application form and appropriate guidance.</p>	<p>New section to provide institutions with additional guidance in preparing and submitting their applications for prescription.</p>	<p>C. Please refer to:-</p>
<p>Initial Scrutiny</p>		

Proposed Amendment	Notes	Comments
<p>7.5 The application will first be considered by the ARB's staff, who may examine it to see that the Board has all the information and material that the institution intended it to have. If the staff consider that anything may be missing the Board may notify the institution. This will normally be within 3 weeks. The institution will have 14 days to supply what is missing or to notify the Board that it does not intend to do so and explain why. The staff will not otherwise at this stage be scrutinising the application for content. Neither at this nor at any other stage will the Board owe any duty to notify the institution of anything that is lacking in the application or that is unclear in it.</p>	<p>There are no proposed changes to this section.</p>	
<p>The Board's Prescription Committee</p> <p>7.6 The Board has established a Prescription Committee to oversee the stages of this procedure</p>	<p>The membership of the Prescription Committee was amended by the Board at its</p>	

Proposed Amendment	Notes	Comments
<p>up to submission to the Board. The membership should consist of the following:</p> <ul style="list-style-type: none"> • At least 4 members drawn from the ARB Board; plus • A further appointed member drawn from the ARB Board to act as Chair; plus • A member of the Committee's Pool of Independent Advisers 	<p>meeting of 12 February 2009. The proposed changes to this section reflect the revised membership as approved by the Board.</p>	
<p>7.7 The Committee may add further persons drawn from the Pool of Independent Advisers to the membership of the Committee. The members of the ARB Board sitting on the Committee (including the Chair) will be no less than 3 appointed and 2 elected members of the ARB Board.</p>	<p>The membership of the Prescription Committee was amended by the Board at its meeting of 12 February 2009. The proposed changes to this section reflect the revised membership as approved by the Board.</p>	
<p>7.8 The Committee acts in an advisory capacity, as</p>	<p>Proposed new section to</p>	

Proposed Amendment	Notes	Comments
the Board alone decides whether qualifications are prescribed.	clarify the role of the Committee within the process.	
7.9 Within 8 weeks of the receipt of an application the Committee will advise whether the application should be considered by the Board or whether, before it is submitted to the Board, there are any aspects of the application or the material in support upon which further explanation is required from the institution or advice is needed.	There are no proposed changes to this section.	
8.0 If an explanation is required, the Prescription Committee will notify the institution of the points upon which an explanation is required. Any explanation must be provided in writing within 3 weeks. Student portfolios or other student work must not be submitted with an explanation unless the committee (or the Board at any later stage) has	There are no proposed changes to this section.	

Proposed Amendment	Notes	Comments
specifically required them and then only to the extent specified.		
<p>8.1 If advice is needed on an application, the Prescription Committee can seek advice on the points upon which an explanation is required from its pool of Independent Advisers. The pool consists of people who are impartial and suitably qualified to advise the Board. Details of the Board’s current pool of Independent Advisers can be found at the following link:</p> <p>http://www.arb.org.uk/about/advisers-to-the-prescription-committee.shtml. The advice and the terms of reference seeking the advice will be in writing. The Adviser/s will be given 3 weeks within which to provide the advice. The advice will then be given to the institution for comment. If the institution has any comments on the advice or if, in the light of</p>	<p>Proposals for minor changes to this section to allow institutions to clarify the process which takes place should the Committee seek the advice of one of its Independent Advisers.</p>	

Proposed Amendment	Notes	Comments
<p>the advice, it wishes to explain or supplement its application with additional material it must submit such comments and material within 3 weeks of receiving the advice. Once the institution has commented, the Adviser will be asked to confirm whether they are satisfied with the institution's response. All of this information will be provided to the Prescription Committee and the Board. To maintain impartiality, the identity of the Independent Adviser used will remain anonymous to the institution concerned.</p>		
<p>8.2 The Committee may in exceptional circumstances seek further explanations and/or advice. If further explanations and/or advice are sought, the above procedure will be repeated, except that the Committee may shorten any applicable period. Further explanations should be</p>	<p>Proposals for minor changes to allow more flexibility in the Committee's approach to seeking explanations.</p>	

Proposed Amendment	Notes	Comments
sought in writing; however, the Committee may seek explanations orally, in appropriate cases.		
8.3 Exceptionally, but where it considers it necessary and appropriate, the Committee may require additional relevant information to be provided by an institution during the course of a visit to the institution by such independent advisers as the Committee may nominate.	New section to provide flexibility within the process where the need arises.	
8.4 Following receipt of all explanations or advice the Committee will refer the application to the Board. The Board will not generally consider any application unless it has been referred to it by the Committee.	There are no proposed changes to this section.	
8.5 The institution is entitled to have sight of the papers which are to be presented to the Board for	New section to promote greater transparency within the process.	

Proposed Amendment	Notes	Comments
<p>decision following the Committee’s consideration of the application. The institution will have the opportunity to make representations on the paper and to offer comments on accuracy. It must provide any such comments within 14 days of receiving the papers. In exceptional circumstances, the Prescription Committee may permit a longer period in which the institution may respond. The institution’s comments will be presented to the Board alongside the application.</p>		
<p>The Board’s Decision</p> <p>8.6 Once received, the Board will consider the application, along with any explanations, advice and comments.</p> <p>Stage 1</p>	<p>Proposals for minor changes to this section to clarify the Board’s decision-making process.</p>	

Proposed Amendment	Notes	Comments
<p>At this stage, the Board will indicate that it is minded either:</p> <ul style="list-style-type: none"> a) to accept the application and to prescribe the qualification or qualifications as sought by the institution; or b) to accept the application and grant 'Qualified Approval', which denotes either: <ul style="list-style-type: none"> (i) not granting prescription to all of the qualifications for which prescription is sought; and/or (ii) attaching special conditions, and/or (iii) prescribing for a period of less than four years; or c) to reject the application. 		

Proposed Amendment	Notes	Comments
<p>If pursuant to Stage 1 the Board indicates that it is minded to either:</p> <ul style="list-style-type: none"> a) reject the application; or b) give a Qualified Approval; <p>it will not take such a decision without first providing written reasons for the indication to the institution and giving the institution the opportunity to make representations in writing to the Board. Any representations must be received by the Board within 4 weeks.</p> <p>If at Stage 1, the Board decides to accept the application and prescribe the qualifications sought, Stage 2 below will not apply.</p>		

Proposed Amendment	Notes	Comments
<p>8.7 Stage 2</p> <p>On receipt of any Stage 1 representations the Board will reconsider its position and will decide to either:</p> <ul style="list-style-type: none"> a) accept the application and to prescribe the qualification or qualifications as sought by the institution; or b) grant Qualified Approval; or c) reject the application. <p>(For the avoidance of doubt, if no Stage 1 representations are received, the Board will be entitled, in accordance with its current stated position, to either reject the application or to proceed on the basis that it is minded to grant Qualified Approval.)</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	
		C. WORD ORDER:-

Proposed Amendment	Notes	Comments
<p>8.8 If the Board rejects the application, or grants Qualified Approval, it will within 3 weeks of its meeting notify the institution of the reasons for its decision. Where appropriate, the Board's reasons will indicate which of its criteria and/or objectives have not been or may not be met but the reasons will not include any advice on any remedial or other action that should be taken as the institution will have to decide what it should do if it chooses to submit another application.</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	<p>it will notify the institution of the reasons for its decision within 3 weeks of its meeting.</p>
<p>8.9 A decision to accept or reject any application in whole or in part will be final (including any decision on any period or condition), and there will be no appeal. In case of rejection [or Qualified Approval] the institution may make another application in accordance with this procedure. An institution can re-apply as soon as it chooses. In addition, in</p>	<p>Proposals for minor changes to this section to clarify the Board's decision-making process.</p>	

Proposed Amendment	Notes	Comments
<p>exceptional circumstances, the Board will be entitled to reconsider any decision to reject an application or, where it prescribed a qualification, as to the period or conditions applicable, should it become aware of any material which was not available to it at the date of its decision. The Board will determine the procedure to be adopted in order to consider such material and to reconsider its decision. Unless and until the decision is reconsidered the Board's decision will be unaffected and will remain binding.</p>		

<p>Standard Conditions of Prescription</p> <p>9.0 Prescription of a qualification will be subject to the following standard conditions:</p> <p>a) The period of prescription shall commence on a date to be decided by the Board (normally the beginning of the academic year).</p> <p>b) Prescription of a qualification shall be by reference to a programme specification. No change may be made to the title of any course or qualification or material change to the content so defined within a programme specification (allowing for normal course development) without first obtaining the written permission of the Board. (For further information on changes to qualifications, refer to Appendix 3.)</p>	<p>Proposed amendments to Standard Condition (c), which has been expanded to take account of requirements under the Mutual Recognition of Professional Qualifications Directive [2005/36/EC]; new Standard Condition (d) to reflect individuals' EU Treaty rights.</p>	<p>B. As already noted standard conditions do not apply to "Qualified Approval"</p>
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c) Annually and by a date to be set by the Board, the institution shall be required to provide the Board with information of the nature set out in Appendix 2 to enable the Board to see that **a.** all its criteria and the relevant requirements set out in Article 46 (or Article 47) of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC] are being attained by students who have been awarded the qualification prescribed; **b.** adequate systems are in place to ensure that all the Board's criteria will be met by students/candidates for the period of prescription; **c.** that the institution's resources remain as set out in its application and are adequate; **and d.** all of the factors referred to at paragraphs 6.6 and 6.7 continue to be demonstrated.

d) The institution will ensure that appropriate

C. Section 5.5 already has parts a) b) c) and d) – so these sub-sections are confusing.

The sub-sections should be differentiated from the main sections by using lower case Roman numerals:-
i), ii), iii), and iv).

<p>procedures will be maintained so that all students undertaking a prescribed qualification are fully informed of the extent of the application of that qualification to entitlement to registration as an architect in circumstances in which the student lacks a required antecedent qualification e.g. Part 2 without Part 1 .</p>		
<p>9.1 If as a result of the information provided under (c) above or from any source at any time (and please see Appendix 4 for the Board’s Causes for Concern process), the Board considers that either</p> <p>a) the application or any of the material relied on by the institution in support (including explanations given) was</p> <ul style="list-style-type: none"> i. untrue and/or ii. was misleading in a material respect as 	<p>Proposals for minor changes to this section to reflect changes to the Standard Conditions of Prescription (see 9.0).</p>	

<p>a result of which the Board might not have accepted the application; or</p> <p>b) criteria or the relevant requirements set out in Article 46 (or Article 47) of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC] are not being met by students awarded the prescribed qualification; or</p> <p>c) the institution does not have the resources stated in its application and/or its resources are not adequate; or</p> <p>d) the institution has not complied with any of the conditions set out in paragraph 9.0 and (c) above or any other condition made under paragraph 9.3 below;</p> <p>then the Board may notify the institution that it is of</p>		
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<p>the opinion that the prescription should be revoked in whole or in part, together with its reasons for that opinion.</p>		
<p>9.2 The institution will within 3 weeks (or such varied period as the Board may allow) make any representation in writing to the Board as to why it should not so act. On receipt of such representations (and taking account of any representations submitted to it by any other body, whether or not the Board shall be obliged in law to consult it) the Board will decide within 4 weeks whether or not to revoke the prescription of the qualification in whole or in part. If it does so the revocation will not affect the validity of the qualification awarded prior to the revocation. The institution may make an application in accordance with this Procedure for prescription of the qualification whose prescription has been revoked.</p>	<p>There are no proposed changes to this section.</p>	

<p>9.3 The above provisions will not prevent the Board from entering into discussions with the institution in order to avert the need for a decision to revoke prescription.</p>	<p>New section to promote greater flexibility within the process.</p>	
<p>9.4 Exceptionally, but where it considers it necessary and appropriate, the Board may require additional relevant information to be provided by an institution during the course of a visit to the institution by such independent advisers as the Board may nominate.</p>	<p>New section to promote greater flexibility within the process.</p>	
<p>9.5 Where any of the events set out in paragraph 9.1 above have occurred or are present and the circumstances require urgent action the Board may by notice to the institution revoke the prescription with immediate effect.</p>	<p>Proposals for minor changes to this section to reflect changes to Section 9.1.</p>	

9.6 Where in the opinion of the Board it is appropriate, the Board may vary any of the standard conditions and may make prescription of a qualification subject to other conditions.	There are no proposed changes to this section.	
End.		



Amendments to the Procedures for the Prescription of Qualifications

Consultation Responses – Comments on Appendices to the Draft Procedures

Appendices Response Received From:

A. David Gloster RIBA

Proposed Amendment	Notes	Comments
Appendix 1 Extensions to Prescription 9.7 Where exceptional and unforeseen circumstances arise (e.g., the departure of the Head	 New section to provide flexibility where exceptional circumstances arise.	

Proposed Amendment	Notes	Comments
<p>of School, the timing of the introduction of a new qualification etc), an institution may request an extension of no more than one year to its period of prescription.</p>		
<p>9.8 In such cases the institution must provide a detailed rationale for the extension in writing. This institution will also need to explain to the Board how it will ensure that it will continue to meet the objectives set out in paragraph 6.6 during the extended period sought.</p>	<p>New section to provide flexibility where exceptional circumstances arise.</p>	
<p>9.9 The granting of an extension to a prescription period is at the discretion of the Board, and the Board reserves the right to request any additional information it deems appropriate to enable it to</p>	<p>New section to provide flexibility where exceptional circumstances arise.</p>	

Proposed Amendment	Notes	Comments
<p>continue to be confident that the standard conditions of prescription will be met, e.g. an internal review or validation report.</p>		
<p>Appendix 2 Annual Monitoring</p> <p>10. 0 Annually and by a date to be proposed by an institution, and set by the Board, the institution will be required to provide the Board with information of the nature set out below to enable the Board to be confident, a. that all its criteria and the relevant requirements set out in Article 46 (or Article 47) of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC] are being attained by students who have been awarded the qualification prescribed; b. adequate systems are in</p>	<p>Proposed minor changes to ensure requirements of the relevant Articles set out under the Mutual Recognition of Professional Qualifications Directive continue to be met throughout the period of prescription.</p>	

Proposed Amendment	Notes	Comments
<p>place to ensure that all the Board's criteria will be met by students/candidates for the period of prescription; c. that the institution's resources remain as set out in its application and are adequate; and d. that any conditions of prescription continue to be met. In addition, the Board will need to be assured that any changes made to the programme specification reflect normal course development and have not radically altered the content of the course.</p>		<p>A. how are resources set out in C) calculated, and is the methodology robust?</p>
<p>10.1 In order for the Board to have an assurance, institutions awarding prescribed qualifications must submit annually, to the Board, the following documents:</p> <ul style="list-style-type: none"> • external examiners reports and responses; 	<p>Proposed minor changes to require institutions to submit any relevant internal review reports as part of each annual monitoring submission and more detailed information relating to titles and/or content of prescribed qualifications.</p>	

Proposed Amendment	Notes	Comments
<ul style="list-style-type: none"> • any relevant reports from external bodies and responses; • any relevant reports from internal review panels, including student feedback; • student progress information, specifically; numbers of students in each cohort, and pass/failure rates, including an explanatory commentary where necessary. • details of any changes to the title and/or content of a qualification, including the rationale for these changes. See Appendix 3 for further detail • any other information indicating that any condition of prescription may not have been met in some material respect. 		
Appendix 3		

Proposed Amendment	Notes	Comments
<p>Changes to Qualifications</p> <p>Notification of changes to the Board</p> <p>10.2 As stated in paragraphs 5.5 and 9.0, the standard conditions of prescription state that 'no change may be made to the title of any course/qualification or material change to the content so defined within a programme specification (allowing for normal course development) without first obtaining the permission of the Board'.</p>	<p>There are no proposed changes to this section.</p>	
<p>10.3 A material change would be, for example, where the course content has been reorganised, or where the number of years of study have been changed, or where a new specialisation is introduced. If an institution is in any doubt as to whether a change is material, it should contact the</p>	<p>New section to provide institutions with additional guidance on title/content changes to prescribed qualifications.</p>	<p>A. This requires further detailed clarification to ensure that 'reorganisation' need not refer to essential minor changes.</p>

Proposed Amendment	Notes	Comments
ARB Staff for guidance in relation to this.		
<p>10.4 Changes to a qualification falling within paragraph 10.3 need to be notified to the Board at the earliest possible opportunity. If the timing is appropriate, changes can be notified through an institution's annual monitoring submission. In line with the standard conditions of prescription, the Board's approval should be sought before any such change becomes effective.</p>	<p>New section to provide institutions with additional guidance on title/content changes to prescribed qualifications.</p>	
<p>10.5 Once aware that a change is being made, the Board will monitor the progress of the change as it moves through the institution's own quality assurance mechanisms.</p>	<p>New section to provide institutions with additional guidance on title/content changes to prescribed qualifications.</p>	

Proposed Amendment	Notes	Comments
<p>10.6 Any changes which are not material and which do not fall within paragraph 10.3, e.g. evolutionary changes to project briefs, do not need to be notified to the Board.</p>	<p>New section to provide institutions with additional guidance on title/content changes to prescribed qualifications.</p>	
<p>10.7 When notifying a change, the Board will typically expect to receive clear and concise details outlining the nature of the changes and the rationale for the changes. Institutions should consider submitting the following details:</p> <ul style="list-style-type: none"> • Rationale for the change/s; • An explanation of the scope and nature of the change/s to the course; • An explanation of impact that the changes are likely to have on meeting the Board's Criteria (where relevant institutions should 	<p>New section to provide institutions with additional guidance on title/content changes to prescribed qualifications.</p>	

Proposed Amendment	Notes	Comments
<p>submit a revised mapping exercise to assist the Board in determining whether the qualification will continue to meet the Criteria);</p> <ul style="list-style-type: none"> • Clarification as to whether there will be any impact on the resourcing of the qualification as a result of the changes; • Clarification as to whether the change/s has institutional approval; and • Any other information which may assist the Board in its consideration of the change/s. 		<p>A. Both ARB and RIBA need to ensure that the introductions to the new Criteria do not unleash a great deal of anxious enquiries or unnecessary paperwork.</p>
<p>10.8 For information on dealing with the notification of changes to the European Commission, please see Appendix 5.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	

Proposed Amendment	Notes	Comments
<p>Appendix 4</p> <p>Causes for Concern Process</p> <p>10.9 The Board has established a ‘Causes for Concern’ process to deal with any serious issues or allegations it receives in relation to an ARB-prescribed qualification which might affect its prescribed status.</p>	<p>New section to provide flexibility where appropriate.</p>	<p>A. We have concerns that whilst a sensible proposal, there needs to be examples given of what constitutes ‘serious issues or allegations’.</p>
<p>11.0 The Causes for Concern process is not intended to replace or be a substitute for an institution’s own processes for reporting concerns and allegations. Neither is the Board responsible for the regulation of institutions or the control of funding. The Causes for Concern process cannot be used to appeal academic decisions relating to marks, progression or awards. As such, the Board would only expect to consider any concerns or</p>	<p>New section to provide flexibility where appropriate.</p>	

Proposed Amendment	Notes	Comments
<p>allegations once other relevant processes have been concluded.</p>		
<p>11.1 The Board will forward any credible allegation of impropriety and evidence provided to the appropriate officer of the institution involved and/or any relevant regular or public authority. The Board will ask to be informed of the outcome of any enquiry or investigation insofar as the same is relevant to the prescription of qualifications. It may invite an institution (at an appropriate point) to provide a written answer to any allegations. It may invite a whistle-blower to provide further information.</p>	<p>New section to provide flexibility where appropriate.</p>	<p>A. We are aware that the motives of whistleblowers may sometimes be very complex and personalised, credibility may be difficult to establish initially.</p>
<p>11.2 Through the Causes for Concern process, any information received will to the extent appropriate</p>	<p>New section to provide flexibility where appropriate.</p>	

Proposed Amendment	Notes	Comments
<p>be considered for the purpose of decisions arising under these procedures.</p>		
<p>Appendix 5</p> <p>Notification of a New Qualification to the European Commission and Notification of Changes to an ARB Prescribed Qualification to the Commission</p> <p>Material to be collated for Notification to the European Commission</p> <p>11.3 Once a qualification has been prescribed by the Board for the first time, or where changes have been made to a qualification prescribed by the Board, such qualifications will be notified to the</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	<p>A. There is need for a broader discussion on the nature and implications of notification.</p>

Proposed Amendment	Notes	Comments
European Commission for listing under the UK's entry under Annex V of the Mutual Recognition of Professional Qualifications Directive [2005/36/EC].		
11.4 An institution, with ARB, will prepare the relevant material to be sent to the European Commission.	New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.	
<p>Notification to the European Commission</p> <p>11.5 Once the relevant material has been collated, ARB will forward the application to the relevant UK Government department, which will in turn forward the material to the UK's national Co-ordinator, who is responsible for the implementation of the Directive</p>	New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.	A. Please identify the UK's National Coordinator

Proposed Amendment	Notes	Comments
in the UK.		
<p>11.6 The UK's national Co-ordinator will forward the application to the European Commission for scrutiny. The European Commission may raise written queries with the UK's national Co-ordinator in relation to the application. The UK's national Co-ordinator will liaise with ARB in order to respond to any written queries which may be raised. Where appropriate, ARB will liaise with the institution in order to respond to any written queries raised by the Commission.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	
<p>11.7 The application will also be made available to all of the European Co-ordinators for scrutiny for a period of 3 months. European Co-ordinators may</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent</p>	

Proposed Amendment	Notes	Comments
<p>raise written queries through the Commission.</p> <p>Where written queries are raised by the European Co-ordinators, the UK's national Co-ordinator will liaise with ARB in order to respond to any such queries which may be raised. Where appropriate, ARB will liaise with the institution in order to respond to any written queries raised by the European Co-ordinators.</p>	<p>Authority for Architects.</p>	
<p>11.8 If the queries are resolved through correspondence, the Commission will notify the UK's national Co-ordinator and the qualification will be listed within the UK's entry under Annex V of the Directive.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	
		<p>A. Some guidance is needed for institutions in the</p>

Proposed Amendment	Notes	Comments
<p>11.9 Where queries from the Commission and/or the European Co-ordinators remain unresolved, the Commission will forward the application to its Co-ordinators Group. The Co-ordinators Group consists of representatives from each State within the European Economic Area (EEA). Representatives of the UK, and where appropriate, representatives of the institution [who will be determined by the institution upon the invitation of ARB], will attend the Co-ordinators meeting/s to discuss and respond to queries raised by other European Co-ordinators and/or the Commission. If any outstanding queries are resolved through correspondence, the Co-ordinators Group will be asked to approve the listing of the qualification within the UK's entry under Annex V of the Directive.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	<p>potentially anomalous position of having validation and prescription – but experiencing difficulties with notification.</p>

Proposed Amendment	Notes	Comments
<p>12.0 Where any outstanding queries remain the Commission reserves the right to forward the outstanding queries to its Sub-Group for discussion and/or a further meeting of the Co-ordinators Group. This process may be repeated until a decision is made in relation to the listing of the qualification.</p> <p>12. 1 For further advice and guidance, institutions may wish to contact the Qualifications Department.</p> <p>12.2 The process outlined above is subject to alteration by the European Commission.</p> <p>12. 3 ARB will ensure that the institution is informed of the position as the application is progressed through the European Commission's processes.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	

Proposed Amendment	Notes	Comments
<p>Notification of changes to the European Commission</p> <p>12.4 Any institution which offers a qualification that is listed under Annex V of the European Commission's Mutual Recognition of Professional Qualifications Directive [2005/36/EC] will also need to be aware of the processes for notifying changes to qualifications to the European Commission.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	<p>A. Potentially another burdensome audit trail awaiting criticism from the Schools.</p>
<p>12.5 Where an institution has made alterations that fall under the Commission's definition of 'significant change', the institution will be required to make a full notification of the relevant qualifications to the Commission through ARB.</p>	<p>New section to provide institutions with additional guidance regarding ARB's role as the UK's Competent Authority for Architects.</p>	

Proposed Amendment	Notes	Comments
<p>12.6 Where an institution has made alterations that fall under the Commission’s definition of ‘minor change’, the institution will be required to make a less detailed notification to the European Commission through ARB. This less detailed notification will only need to consist of information that relates directly to the change that is being made.</p>	<p>New section to provide institutions with additional guidance regarding ARB’s role as the UK’s Competent Authority for Architects.</p>	
<p>12.7 For detailed guidance on the process and documentation required by the European Commission for the purposes of notifying a qualification in architecture, and the Commission’s definitions of ‘significant change’ and ‘minor change’, please see Appendix 3 and Appendix 5.</p>	<p>New section to provide institutions with additional guidance regarding ARB’s role as the UK’s Competent Authority for Architects.</p>	

Proposed Amendment	Notes	Comments