

Consultation on ARB's Single Equality Scheme

ARB's Single Equality Scheme		
Section	Comments	ARB Comments
Chair's foreword	Architectural Association School of Architecture No additional comment.	
Registrar's Introduction	Architectural Association School of Architecture No additional comment.	
Section 1 – Who we are and what we do	Architectural Association School of Architecture No additional comment.	
Section 2 – ARB's Single Equality Scheme	Architectural Association School of Architecture No additional comment.	
Section 3 – Where we are now and our future work	Architectural Association School of Architecture No additional comment.	
Section 3.1 – General issues	English Heritage 3.1.9 – A data source on diversity within the architectural profession would be most valuable for English Heritage if it could distinguish Conservation Architects' practices as a sub-set. This is a most	Equality data monitoring, once established, will be published annually on the website. This will apply to architects only, not the architectural profession as a whole.

	<p>welcome action.</p> <p>3.1.11 Why is it not the intention to ask architects' practices to provide evidence of compliance with equality law on employment as part of professional standards? Would this be helpful? The CABA research suggests that it is at the stage of applying for a first job that BAMEW architecture graduates seem to meet with difficulties. Architectural Association School of Architecture No additional comment.</p>	<p>This is not within ARB's remit. However, Standard 12 of the Architects Code expects architects to treat others with respect and in line with the law. Failure to do so may result in disciplinary proceedings being brought.</p>
Section 3.2 – Race Equality Duty	<p>Architectural Association School of Architecture No additional comment.</p>	
Section 3.3 – Disability Equality Duty	<p>Architectural Association School of Architecture No additional comment.</p>	
Section 3.4 – Gender Equality Duty	<p>Architectural Association School of Architecture No additional comment.</p>	
Section 3.5 – Employment Equality Age Regulations	<p>Architectural Association School of Architecture No additional comment.</p>	
Section 3.6 – Religion or Belief Regulations	<p>English Heritage Awareness training on issues of religion and belief for ARB staff would be of interest to English Heritage which deals with similar</p>	<p>Not within the scope of the consultation. Will make informal contact with English Heritage to respond.</p>

	<p>issues with regard to Listed Places of Worship.</p> <p>Architectural Association School of Architecture No additional comment.</p> <p>British Humanist Association (BHA) The BHA welcomes this example of good practice, and the recognition that “equality and diversity principles apply to everyone, irrespective of their religion and/or belief”, and in particular the acknowledgement that “religion or belief” also refers to individuals who do not hold religious views.</p>	<p>Noted.</p>
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<p>Section 3.7 – Sexual Orientation Regulations</p>	<p>Architectural Association School of Architecture No additional comment.</p>	
<p>Section 3.8 – Welsh Language Act 1993</p>	<p>Architectural Association School of Architecture No additional comment.</p>	
<p>Section 3.9 – The Equality Bill 2009</p>	<p>Architectural Association School of Architecture No additional comment.</p>	
<p>Section 3.10 – Human Rights Act 1998</p>	<p>Architectural Association School of Architecture No additional comment.</p>	
<p>Section 4 – Our</p>	<p>Architectural Association School of Architecture</p>	

commitment to equality and diversity Section 4.1 – Scheme governance arrangements	No additional comment.	
Section 4.2 – Management arrangements	Architectural Association School of Architecture No additional comment.	
Section 5 – Involvement and consultation Section 5.1 – Internal involvement and consultation	Architectural Association School of Architecture No additional comment.	
Section 5.2 – External involvement and consultation	Architectural Association School of Architecture No additional comment.	
Section 6 – Equality and	Architectural Association School of Architecture No additional comment.	

diversity impact assessments		
Section 7 – Gathering and using information	<p>Architectural Association School of Architecture No additional comment.</p> <p>British Humanist Association (BHA) If the ARB is to gather further information on “religion or belief” of members of staff, the BHA would recommend that you include a “non-religious” answer space and an “other” answer space. Humanist and small religious organisations should be included when compiling or updating databases of community organisations and information directories. From our experience gained in the “religion or belief” strand, the BHA would stress that the widely quotes statistics on “religion or belief” in the latest (2001) census are deeply problematic and would not be an accurate base-line figure from which you might wish to analyse the composition of your workforces” religious affiliation. For example, please see the latest British Social Attitude Survey which states that 43% of the population has no religion, as opposed to 15% in the 2001 Census, show the difficulty in accurately measuring this aspect of identity in the population.</p>	Noted. Will be incorporated into the Single Equality scheme, and on the Equality Monitoring form. We will ensure we continue to consult with humanist and small religious organisations.
Section 8 – Monitoring and review process	<p>Architectural Association School of Architecture It is of particular importance to UK schools of architecture that the ARB publishes comparative statistics of its Part 1 and Part 2 exemption activities relating to students outside the EU by nationality and gender. It is already a widely held view that the exceptionally</p>	This is not currently published. However, having received this feedback, we will explore doing so in the future.

	high fees charged by the ARB for this service is in itself discriminatory.	
Section 9 – the action plan	Architectural Association School of Architecture Schools will wish to know what parameters ARB are going to use in their prescription process. It is our view that the higher education sector already has quite adequate monitoring of these issues and that ARB’s intervention is both unnecessary and could be counter-productive as those involved in the ARB prescription process are unlikely to have as much evaluative expertise in this field as HR professionals.	Any procedures for evaluating schools/ institutions equality and diversity compliance will be proportionate, and will avoid duplicating existing assurance regimes.
Section 10 – Appendix 1: functions, policies, practices etc.	Architectural Association School of Architecture No additional comment.	
Section 10 – Appendix 2: ARB’s equality and diversity policy	Architectural Association School of Architecture No additional comment.	
Section 10 – Appendix 3: Equality and diversity impact assessment table	Architectural Association School of Architecture No additional comment.	

Single Equality Scheme – 10 questions

Question	Answer	Comments
<p>1. Does the structure and layout of our consultation document lend itself to being easy to access and understand?</p>	<p>Oxford Brookes University Structure looks fine. Action Plan is clearly set out and has target dates and details of ownership of different initiatives.</p> <p>Solicitors Regulation Authority The layout of the document works well, although in the final version of the scheme it might be more effective for the ARB to separate our more explicitly its duties as a regulator from its duties as an employer, or at least distinguish further between them. While the two roles are of course interlinked, in practice the focus of the ARB in fulfilling its legal duties as an employer may require a different approach compared to progressing diversity initiatives with the regulated community, and the final version of the equality scheme could make this clear.</p> <p>English Heritage Yes.</p> <p>Architectural Association School of Architecture Yes.</p> <p>Sheffield University School of Architecture Yes.</p>	<p>Noted. Although we have not amended the scheme to reflect this comment, we have included a paragraph which highlights our awareness of the difference, and what steps we have taken to address this.</p>

	<p>School of Architecture and Construction</p> <p>Yes, though it might have been more useful if there had been “prompt” example questions identifying who would consult the policy, why and how they might seek attention redress.</p>	<p>Noted for future reference.</p>
<p>2. Is our explanation of the purpose of the consultation on our draft scheme clear?</p>	<p>Oxford Brookes University</p> <p>Chair’s foreword is concise and clear. Registrar’s introduction states the requirement for equal opportunities and diversity to be embedded within everything the Board does. This is good – but in order to do this, it is important that EODC is not just bolted onto agendas and meetings, but becomes a party of how everyone in the organisation works. It is particularly important in any recruitment and selection procedures that short-listing is transparent – this makes the job spec and person spec very important docs.</p> <p>Solicitors Regulation Authority</p> <p>Yes.</p> <p>English Heritage</p> <p>Yes.</p> <p>Architectural Association School of Architecture</p> <p>In terms of internal procedures within ARB as a corporate organisation – yes. In terms of the connection between this single equality scheme and the Architects Act – no.</p>	<p>We are committed to ensuring that the activities arising from implementing our Single Equality Scheme become embedded as part of our core work, rather than a “bolt-on” or a tick-box exercise.</p> <p>Response: Architects Act and Equality Act are separate pieces of legislation. We are required by the Architects Act to carry out certain statutory functions. The Equality Act sets out requirements that public authorities must comply with.</p>

	<p>Sheffield University School of Architecture Yes.</p> <p>School of Architecture and Constructions Yes, although I think that this will become clearer through monitoring.</p>	<p>Our statutory functions under the Architects Act, including our responsibilities as a public body and employer, have now become subject to the Equality Act. This is the connection between the two pieces of legislation.</p>
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<p>3. Have we identified the primary equality and diversity issues that need to be addressed, including the timing for collating equality monitoring data?</p>	<p>Oxford Brookes University All areas appear to be covered, although some seem to have more mention than others. For example, “disability” is mentioned quite a few times, but diversity not so much (although 3.1.7 and 3.18 shows this as a clear intention). Monitoring on an annual basis is a good start, but action plans will have to be attached to these to address any areas where the Board might feel it is not demonstrating EODC. There may be areas which the Board could concentrate on prior to the first monitoring data. Maybe look at the governance of ARB and ensure that it takes account of EODC. Also, the 8 members appointed by the Privy Council – are EOD principles followed during this appointment process? Is there any obvious imbalance in terms of gender, ethnicity, disability etc?</p> <p>Solicitors Regulation Authority</p>	<p>The duties under the disability strand are more wide-ranging, hence the additional focus.</p> <p>This is implicit within the Action Plan. Monitoring will help us to identify any gaps, and actions taken to address them.</p> <p>This is not within ARB’s control. However, public appointments are subject to the Office of the Commissioner for Public Appointment’s own stringent processes and procedures which take account of equality and diversity principles.</p>
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	<p>Section 3 of the report is a useful summary of the key equality and diversity issues that the ARB aims to address. We note in particular the commitment on page 5 of the consultation paper to support and inform consumers, in order to better understand the consumer experience when accessing architectural services or coming into contact with the ARB itself, and we agree that this will be particularly important work.</p> <p>English Heritage Cannot comment.</p> <p>Architectural Association School of Architecture Partially, but the timetable and focus relating to prescription is not clear.</p> <p>Sheffield University School of Architecture The primary issues appear to be addressed.</p> <p>School of Architecture and Construction Yes, not sure about the last phrase – won't this remain a developmental issue?</p>	<p>Noted.</p> <p>More detailed information on each objective will be discussed with those concerned.</p> <p>Monitoring will become an ongoing core function of ARB's work, as will the publication of data.</p>
<p>4. Or have we missed an issue that will have a major impact on a particular group or groups?</p>	<p>Oxford Brookes University Flexible working has been mentioned. Also need to consider work/life balance, maternity/paternity/</p>	<p>This aspect is covered in our internal procedure on parental rights, which is reviewed</p>

	<p>adoption leave etc.</p> <p>Solicitors Regulation Authority Section 3 confirms the ARB’s commitment to consider setting up a Welsh language scheme, and while we would support this move, it is equally important to account for different languages more generally. For example, the ARB could explore the possibility of introducing an alternative language policy (if one does not already exist) to set down an agreed protocol for managing requests and providing information in different languages such as Welsh. It would also be useful to consider developing a policy setting out when and how the ARB will make reasonable adjustments to its services to accommodate the needs of different users, if such a policy does not already exist.</p> <p>English Heritage Is there not an issue about equality of access to employment within the sector? This seemed to be indicated by CABE research?</p> <p>Architectural Association School of Architecture No view.</p> <p>Sheffield University School of Architecture One issue is that affecting people who are looking after small children, the sick and the elderly full time and who are not employed. We think that you should consider giving “carers” of all sorts ARB</p>	<p>regularly and/or in line with changes in legislation.</p> <p>We are seeking information as to the alternative formats that people might needs.</p> <p>This is outside our remit. We will, however, be taking steps to ensure that entry to the Register is free from any form of unlawful discrimination.</p> <p>There is currently no provision for this in the Architects Act.</p>
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	<p>registration fee holidays if they are not practicing as finding the money to pay the fees can be very difficult. These people may be driven to give up their registration.</p> <p>School of Architecture and Construction Difficult to judge – access to information and processes will always be restricted by literacy, education and poverty.</p>	<p>Noted, but this is what the Equality Act is designed to tackle.</p>
<p>5. Have we given too much or too little weight to certain areas of inequality?</p>	<p>Oxford Brookes University ARB’s published values – why not include Promoting Equality and Diversity as a separate heading?</p> <p>Solicitors Regulation Authority As a professional regulator, the ARB may want to place further emphasis in the equality scheme on undertaking work to progress social mobility within the architect profession. The Government’s recent response to the Milburn report on professional access routes has placed the spotlight on social mobility and this equality scheme could refer more to the ARB’s approach toward this subject.</p> <p>English Heritage There is little mention of training or guidance to managers and staff on supporting transgender staff, LGBT staff or women during pregnancy and maternity.</p>	<p>Good point. We will recommend to the Board.</p> <p>It is not within our remit to promote social mobility within the architect profession. However, we will make any published data we hold available on request.</p> <p>This will be covered by diversity and disability awareness training for all staff.</p>

	<p>Architectural Association School of Architecture No view.</p> <p>Sheffield University School of Architecture It feels balanced.</p> <p>School of Architecture and Construction I don't perceive "weightings".</p>	
<p>6. Or are further actions required to ensure that particular proposals have a positive impact on equality?</p>	<p>Solicitors Regulation Authority The equality scheme sets out the ARB's intention to equality impact assess its policies and procedures, which will help to ensure positive impact opportunities are maximised and equality is actively promoted.</p> <p>English Heritage Design SMART evaluation criteria for the outcomes of actions so that progress can be effectively monitored.</p> <p>Architectural Association School of Architecture No view.</p> <p>Sheffield University School of Architecture No.</p> <p>School of Architecture and Construction I don't perceive any.</p>	<p>This element is implicit within our equality impact assessments.</p>
<p>7. Are the proposed actions and arrangements for monitoring and review</p>	<p>Oxford Brookes University Training is obviously going to be essential at all</p>	<p>Training will be provided as required/necessary, and expert</p>

<p>satisfactory?</p>	<p>levels of the organisation. Experts will be needed to ensure that ARB meets its statutory requirements, and a body of knowledge will need to be built up for any specialist areas – for example Access to Work through Jobcentre Plus. In all specific duties where “review the assessment of functions, policies and proposed policies every three years’ appears, suggest adding “or as legislation requires” – as legislation is changing the whole time.</p> <p>Solicitors Regulation Authority The proposals set out on page 18 of the consultation paper seem a good starting point in monitoring the ARB’s progress around equality and diversity.</p> <p>English Heritage As above.</p> <p>Architectural Association School of Architecture It is not clear regarding the prescription process for schools.</p> <p>Sheffield University School of Architecture Yes.</p> <p>School of Architecture and Construction Probably.</p>	<p>advice sought where appropriate.</p> <p>Reviews are scheduled for all our policies on a rolling basis, and they are updated in line with legislation.</p> <p>Revised procedures for the prescription of qualifications are due to be issued for the 2011 cycle.</p>
<p>8. Can you point to any relevant</p>	<p>Solicitors Regulation Authority</p>	

<p>evidence that supports your views/conclusions?</p>	<p>We have no further comments.</p> <p>English Heritage EH Equality Schemes and Action plans. EH Impact Assessment for Equality process.</p> <p>Architectural Association School of Architecture No.</p> <p>School of Architecture and Constructions It's your policy, and you ask my views which are based on long-term involvement with higher education and also social housing, and a critical reading of your policy.</p>	
<p>9. Can you point us to any relevant evidence you think we might have missed that might alter the picture?</p>	<p>Oxford Brookes University On page 10 Specific Duty – suggest an additional bullet point “gather and use information on gender balance in the industry”.</p> <p>Solicitors Regulation Authority We have no further comments.</p> <p>English Heritage The work of Stephen Lawrence Charitable Trust.</p> <p>Architectural Association School of Architecture No.</p> <p>Sheffield University School of Architecture No.</p>	<p>Noted. When analysing data from the Register, we will also take into account any available industry data.</p>

	<p>School of Architecture and Construction</p> <p>I would hope that there has been considerable internal discussion and review of case-based good practice across a wide variety of public sector and regulatory bodies.</p>	<p>Continuous dialogue with appropriate bodies will ensure good practice.</p>
<p>10. Do you have any general views or comments on the scheme not covered by the foregoing questions?</p>	<p>Oxford Brookes University</p> <p>As mentioned in 1 above, the action plan is clear. It might be an idea to have a list of what the evidence of success could be in more specific terms.</p> <p>Solicitors Regulation Authority</p> <p>We have no further comments.</p> <p>English Heritage</p> <p>It would be very helpful to have the data that will be collected and published as this is relevant to accessing careers in conservation architecture.</p> <p>Architectural Association School of Architecture</p> <p>None other than those mentioned elsewhere.</p> <p>Sheffield University School of Architecture</p> <p>It seems to be very positive that ARB is taking these issues so seriously.</p> <p>School of Architecture and Construction</p> <p>No.</p>	<p>We will measure the outcomes specified in the action plan.</p> <p>We will publish all equality data as it becomes available.</p>

Are you responding as:
(Please tick as appropriate)

- A user of architects' services
- A member of the public
- An architect in private practice
- A student of architecture
- An academic/teacher of architecture
- A professional who is not an architect
(Please state what your profession is)

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- A spokesperson from an organisation
(Please state the organisation's name)
Solicitors Regulation Authority
English Heritage
Architectural Association School of Architecture

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- A representative of a specific group
(Please state which group you are representing)

A representative of a local consumer group
(Please state which group you are representing)

Other
(Please state)
