**Response Form - Consultation 14/2011**


Architects Registration Board

**Consultation 14/2011 - Proposed amendments to the Architects Registration Board’s Procedures for Prescribed Examination**

**The examination process judges individual candidates against the criteria which are held in common with schools of architecture and the RIBA. The criteria set out the minimum levels of knowledge, understanding and skills that students of architecture must acquire at key stages in the process of qualifying as an architect. As new criteria are about to be applied to qualifications, equivalent changes must be made to the Prescribed Examination. Certain sections of the current Examination Procedures are not compatible with the new criteria and so amendments have been made to ensure compatibility.**

**Please enter you name and contact details below:**

(Name)

(Job Title)

(Organisation)

(Postal address)

(email address)

Please complete and return to Teresa Graham, Architects Registration Board, 8 Weymouth Street, London W1W 5BU, by **5pm on Friday 18 November 2011.** If you prefer, you can email your response to teresag@arb.org.uk or fax it to 020 7436 5269.


Architects Registration Board

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| **Proposed document** | **Comments**  |
| **A**1. Introduction

At its meeting on 16 September 2010, The Board withdrew its Part 3 oral route with immediate effect, with a view to reconsidering higher level assessments after feedback was sought in the Distinguished Achievements route. This document refers to the current levels and now states::Paragraph 2:*“The Act places on the Architects Registration Board (the Board or ARB) the responsibility for prescribing the qualifications and practical training experience required for entry to the UK Register of Architects. The Board also has a duty to ensure that those who apply for registration without prescribed qualifications have an equivalent standard of competence to those who enter the Register with prescribed qualifications. The Board’s opinion is that a person may be of an equivalent standard of competence if they hold qualifications which are equivalent to the prescribed qualifications. For those without prescribed qualifications from Schools of Architecture, the Board prescribes examinations, under section 4(2) of the Act, at two key stages – commonly called Part 1 and Part 2.”*Paragraph 3 has been amended to reflect criteria change and now states:*“The Board publishes criteria which set out the minimum levels of knowledge, understanding and ability that students of architecture must acquire at each stage. These criteria form the basis upon which the Board makes decisions as to whether or not qualifications from Schools of Architecture can be prescribed. The criteria are organised in two sections, with general criteria applying to Part 1 and Part 2 as a whole and graduate attributes which describe the level differences between Part 1 and Part 2 applications.”*Minor amendments have been made to paragraph 5.Competent Body has been changed to Competent Authority and ‘.for the practice of architecture’ has been deleted from the last sentence, which now states:*“The Directive facilitates the mutual recognition of architectural qualifications across the European Union and the right of establishment and freedom to provide services across the European Economic Area. The Board is the Competent Authority for the Directive in the UK, and as such has responsibility for ensuring that UK professional qualifications in architecture comply with the minimum requirements of the Directive.”* Paragraph 6 now reflects the change in accordance with paragraph 2 above:*“The following Procedures, including the appendices, are rules of the Board made pursuant to section 23(1) of the Architects Act 1997. They set out what a candidate must do in order to be examined under section 4(2) of the Act at Parts 1 and 2 for the purposes of gaining entry to the UK Register of Architects under section 4(1)(b). In order to be eligible to be admitted to the Register, candidates must hold a Part 3 qualification and satisfy the Board’s requirements for practical training.”* |  |
| **B****2.1 Principles**This section of the procedures has been amended to replace the analytical commentary with the comparative matrix. Section 2.1.3 has been replaced with advice to candidates who submit work that is not their own and the sections that follow have been renumbered.*2.1.1 The material upon which candidates will be examined will be:** *A Comparative Matrix stating where and how the candidate believes the Supporting Material demonstrates compliance with each of the criteria;*
* *Supporting Material created by the candidate which may include design projects, technical essays and dissertations, or any other material that the candidate deems relevant;*
* *The Board will specify in its guidance the amount of supporting material permitted;*
* *Oral Explanations on the Comparative Matrix and supporting material given by candidates at interview, if required (see paragraphs 2.6.3-2.6.5 below).*

*2.1.2 The candidate decides, and identifies explicitly and clearly in the Comparative Matrix, what supporting material is to be examined against which criteria. No supporting material will be examined which is not clearly identified in the Comparative Matrix. Supporting material will only be examined against the specific criteria identified by the candidate in the Comparative Matrix. The Comparative Matrix and the supporting material must be the candidate’s own work; this requirement may need to be established in the course of the examination.* *2.1.3 A candidate whose work is found to be plagiarized at any point in the examination process will not be permitted to continue with their application. Re-application will be at the discretion of the Registrar.**2.1.4 The Board will publish guidance on the nature of the Comparative Matrix. However, candidates must submit a Comparative Matrix, and supporting material, which is their own work. The Comparative Matrix must be completed on the Board's form.**2.1.5 No guidance or advice can be given by the Board in relation to the nature of the supporting material. However, the Board publishes guidelines as to the acceptable formats in which such material may be presented. Such guidelines are published on the Board’s website.* *2.1.6 The Board will not give any advice or guidance to candidates beyond that set out in the published guidelines. Any feedback or other comment represents the individual view of the person giving it and, whilst given in good faith, does not commit the Board or any other individual thereafter ”* |  |
| **C****2.2 Eligibility**Under the Board’s current procedures candidates from non-cognate disciplines have access to the Prescribed Examination subject to assurances from the awarding institute that the candidate has covered equivalent ground to that of the ARB criteria for Part 1 and/or Part 2 level and that the qualifications are principally in architecture Despite the introduction of the pro-forma statement template, examiners have become increasingly concerned about the reliability of these statements as candidates performance tends to be poorer. Therefore, in addition to this statement, candidates are asked to provide a statement from the registration or professional body in the country of award confirming the qualification awarded supports access to the profession in that country.Section 2.2.1 now states:*“Candidates are eligible for examination at Part 1 if they have gained a non-prescribed qualification in architecture at first degree level after completing a course of at least three years’ full time duration or part time equivalent.**Candidates with qualifications at first degree level with an architecture component which has been studied alongside other subjects, may also be eligible for examination. In such circumstances, the candidate must submit a completed form from the awarding institution evidencing that the candidate has been examined against requirements comparable to the Board’s criteria for Part 1 in terms of the subjects covered and the levels of achievement required, and that the course of study leading to the qualification awarded was concerned principally with architecture. Candidates may also evidence this by providing a statement from the registration or professional body in the country of award (for those outside the UK only) confirming that the qualification awarded supports access to the profession of architect in that country. These documents will be reviewed and where they are found to provide the necessary level of assurance candidates will be permitted access to the examination.**Candidates who have undertaken a course of study to degree level principally in architecture, but where completion of that course of study does not lead to the award of a qualification, may be eligible for examination if they can provide a transcript from the institution confirming that they have passed all examinations, modules and assessments related to architecture.”*  |  |
| Section 2.2.2. has been amended in line with the amendments to Part 1 above.2.2.2 Part 2*“Candidates are eligible for examination at Part 2 if:*1. *they have gained a non-prescribed qualification in architecture at second degree or diploma level or above after undertaking a course of study of no less than two years’ full time or part time equivalent, subsequent to their being awarded a first degree qualification; or have undertaken at least five years’ study if no prior qualification has been awarded; and have*
2. *either passed the Board’s prescribed examination at Part 1; or have gained a qualification prescribed by the Board at Part 1.*

*Candidates with qualifications at second degree or diploma level or above with an architecture component which has been studied alongside other subjects, may also be eligible for examination. In such circumstances, the candidate must submit a document from the awarding institution certifying that the candidate has been examined against requirements comparable to the criteria at Part 2 in terms of the subjects covered and the**levels of achievement required, and that both the course of study leading to the qualification awarded and the qualification as awarded was concerned principally with architecture. Candidates may also evidence this by providing a statement from the registration or professional body in the country of award (for those outside the UK only) confirming that the qualification awarded supports access to the profession of architect in that country. These documents will be reviewed and where they are found to provide the necessary level of assurance candidates will be permitted access to the examination.”*  |  |
| **D****2.2.3 General Requirements**Section 2.2.3 has now been revised and incorporates changes made to the language requirement.*“(a) The fee for examination shall be as determined by the Board. No candidate will be eligible for examination unless they have paid the prescribed fee. The fees payable are published by the Board and are obtainable from it on application or from its website.* *(b) A scrutiny fee will apply to all applications and will be deducted from the application fee in the event that a refund is made where an application for examination at Part 1 or Part 2 is found not to meet the Board’s eligibility requirements.* 1. *Candidates whose first language is not English are required to submit a valid International English Language Testing System (IELTS) certificate of 6.5 or above with their application for examination.*
2. *EU nationals whose first language is not English may also be required to demonstrate their English Language proficiency and submit a valid IELTS certificate of 6.5 or above with their application.*

*Alternatives to the IELTS requirement may be considered and candidates will be required to complete the Board’s English Language Exemption Form and provide evidence as listed on the form. The Board will then decide whether or not the IELTS is required. The Board’s decision will be final in this respect.* *(e) Whilst candidates may submit work for examination which has been undertaken in an architect’s practice, time spent in an architect’s practice will not be considered in lieu of satisfying the minimum requirements for time spent in formal study set out in sections 2.2.1 and 2.2.2 above.**(f) Candidates who have undertaken a course of study principally in architecture leading to either first degree level qualification or second degree or diploma level qualification, but who have not received a qualification because they failed any examination, module or assessment leading to that qualification (other than in a subject unrelated to architecture), are not eligible for examination.**Candidates who have-*1. *transferred from a course of study leading to a prescribed qualification, to an alternative course of study concluding in a non-prescribed qualification for failing to meet the necessary standard of attainment, or for failing to submit a necessary course requirement, or*
2. *received a non-prescribed qualification after following a course of study leading to a prescribed qualification for failing to meet the necessary standard of attainment, or for failing to submit a necessary course requirement,*

*are not generally eligible to be examined.**The Board may where it has doubt about a candidate’s eligibility under 2.2.3(f) request that the candidate obtains a statement from the head of the awarding school, or a person of equivalent responsibility, to confirm that neither subsection i. nor ii. applies to the candidate.”*  |  |
| **E****2.3 Submitting an application***“2.3.1 Before dates for the examination are set, candidates must submit:** *a completed application form with the prescribed material to confirm eligibility (certificates, transcripts information about the curricular content of the course of study completed etc.)*
* *a completed Comparative Matrix*
* *the prescribed fee.*

*No application will be accepted unless the Comparative Matrix, all prescribed material and the prescribed fee are submitted with the application form. A full list of prescribed material will be supplied as part of the application documents**2.3.2 Candidates must not submit supporting material with the application form and the Comparative Matrix. See section 2.5 below. Supporting material submitted by the candidate with the application form will be returned to the candidate..* *2.3.3 In addition to submitting a Comparative Matrix and supporting material for examination, candidates should note that they will be required to attend an interview or feedback session as part of the examination.”* |  |
| **F****2.5 Submission of Supporting Material**Section 2.5.4 has been added to make candidates aware that submitting large volumes of material could result in examiners being unable to examine all their material within the specified time.2.5.4 states: “Supporting Material which exceeds the published guidelines may not be examined in its entirety where examiners are likely to exceed the maximum time permitted for examination. Examiners will decide amongst themselves which supporting material is most relevant in these circumstances.” |  |
| **G****2.6 The Examination**The examination period has been increased from 45 minutes to 60 minutes as there are now more criteria together with graduate attributes for the examiners to consider and in 2.6.2 (b) the word ‘most’ has been replaced by ‘half or more’ because of the number of criteria. The Comparative Matrix has replaced the Analytical Commentary throughout.2.6.2 now states:*“The examiners, in the first instance within a period of up to 60 minutes, will make a judgment as to whether or not the Comparative Matrix and supporting material demonstrate that either:* 1. *all the criteria are met; or*
2. *half or more of the criteria are met.”*

Currently, candidates who do not qualify for interview have their supporting material returned to them and are not offered any detailed advice on the nature of failure. It was agreed by the Board that examiners be permitted to discuss reasons for failure with these candidates.Section 2.6.3 has now been amended to enable examiners to provide reasons for failure.2.6.3 *“ If the Comparative Matrix and supporting material is not considered by the examiners to meet the requirements of (a) or (b) above, the examiners will recommend that the candidate fail the examination, and the candidate will not be required to offer Oral Explanations at an examination interview, however, the examiners may make use of this time to offer feedback. The examiners will identify on the Board’s form where, in relation to specific criteria, compliance has not been demonstrated, and may comment briefly on the nature of the deficiencies. Examiners may make use of this time to offer oral feedback. Feedback will be given only in relation to the criteria which have not been met. The limits of feedback are described at Section 2.1.6”*2.6.4 *“If the Comparative Matrix and supporting material is considered by the examiners to meet the requirements of (a) above, the examiners will prepare a series of questions to ask the candidate orally at the examination interview. This interview will be for a period of up to 45 minutes. The candidate’s oral responses to these will form the basis of the examiners’ judgment as to whether or not they can be confident that the Comparative Matrix and supporting material is derived from a sufficient understanding of all relevant matters. Candidates will be expected not merely to show familiarity with the work, but also be able to explain and justify their work.”**“If the candidate’s response to questioning is sufficient to enable the examiners to be confident that the Comparative Matrix and supporting material is derived from a sufficient understanding of all relevant matters, then the examiners will recommend that the candidate pass the examination. If the candidate’s response is insufficient, then the examiners will recommend that the candidate fail the examination.”**“The examiners will identify in writing on the Board’s form the reasons as to why, in their judgment, the candidate’s response to questioning was insufficient to enable them to be confident that the Comparative Matrix and/or supporting material was derived from a sufficient understanding of all relevant matters.”* 2.6.5 “*If the Comparative Matrix and supporting material is considered by the examiners to satisfy (b) above, the examiners will prepare a series of questions to ask the candidate orally at the examination interview. The responses will form the basis of the examiners’ judgment as to whether or not those criteria that were not clearly met prior to interview can now be considered to have been met following the candidate’s oral explanations.**The responses to questions will also form the basis of the examiners’ judgment as to whether or not they can be confident that the Comparative Matrix and supporting material is derived from a sufficient understanding of all relevant matters.* *If the candidate’s response to questioning is sufficient to enable the examiners to be confident that all the criteria have been met, the examiners will recommend that the candidate be recognised as having passed the examination. If the candidate’s response to questioning is either insufficient to enable the examiners to be confident that all the criteria have been met, and/or the Comparative Matrix and supporting material is derived from a sufficient understanding of all relevant matters, then the examiners will recommend that the candidate fail the examination.**The examiners will provide written feedback on the Board’s form the reasons as to how, in their judgment, the candidate failed to meet the required standard. The limits on feedback are described in Section 2.1.6.* *Where examiners do not discuss or reference any specific piece of supporting material, this does not imply that properly identified and cited material has not been taken account of as part of the examiners’ deliberations.**2.6.6 Decisions of the examiners are made by majority in the event of disagreement between them.”* |  |
| **H****Appendix 1**Candidates who fail to meet all of the criteria and who are not eligible for referral to lead, are to be re-examined against all the criteria. The Re-sit option has been removed. Re-sit applies where candidates have met a majority of thematic headings and a majority of criteria, candidates in this category are not required to be re-examined against the criteria in any thematic headings which they have entirely satisfied. Candidates are required to satisfy (subject to eligibility) at re-sit, all criteria within the one or two thematic headings that were not entirely satisfied. Feedback from examiners indicates that it is in the interest of the candidate to make a full re-application as context is seldom evidenced in this category. Numbers qualifying for re-sit have been low, with only three applicants qualifying in 2010.Appendix 1.1 has been amended to remove the re-sit option and now states:*“In the circumstances that a candidate receives notification under section 2.8.2 that they have failed the examination and have not satisfied all of the criteria and who do not qualify for Referral to Lead Examiner, may apply to be re-examined at any stage following receipt of the notification. No candidate shall be permitted to apply to be re-examined more than twice, unless the Registrar is satisfied that there is substantial evidence that the candidate’s level of competence has materially improved since the last examination.”* |  |
| Appendix 1.2 Re-sit has been deleted in line with above. |  |
| Appendix 1.3 has been amended in order to transpose the new criteria and reflect that the number of general criteria applying to applications is equal at Part 1 and Part 2 level. Candidates are required to satisfy the same proportion of criteria as was previously applied to the referral to lead examiner process. However, as appraisal of design is to some extent a subjective process, the whole of GC1 has been excluded from this provision, so as to ensure the balance and consistency provided by more than one examiner is applied when reviewing supporting material submitted to satisfy these criteria. 1. *“In order to be considered for referral to lead examiner, a candidate must satisfy the four criteria within GC1 and 32 further criteria.*
2. *At Part 1 level, subject to the decision of the majority of the examiners, the candidate may be offered the opportunity of satisfying the outstanding criteria by referral to the lead examiner, who will consider a single further submission made by the candidate. Where the lead examiner finds that all the graduate attributes have then been met in accordance with 2.6.2(a), he or she will report that finding to the Registrar. Candidates eligible for referral to lead examiner at Part 1 must satisfy the outstanding criteria within 12 months following receipt of the notification of failure.*
3. *At Part 2 level, subject to the decision of the majority of the examiners the candidate may be offered the opportunity of satisfying the outstanding graduate attributes by referral to the lead examiner, who will consider a single further submission made by the candidate. Where the lead examiner finds that all the graduate attributes have then been met in accordance with 2.6.2(a), he or she will report that finding to the Registrar. Candidates eligible for referral to lead examiner at Part 2 must satisfy the outstanding criteria within 12 months following receipt of the notification of failure.*
4. *Where the lead examiner finds at a referral that the remaining criteria have not been satisfied, he or she will recommend (subject to eligibility) that the candidate be re-examined for all criteria.*
5. *Where time limits are specified in 2, 3 and 4 above, candidates who do not completely satisfy the outstanding criteria within the specified period, either for reasons of achievement or by failing to complete the process within the specified time, will be required to make an application for re-examination against all the criteria.*
6. *No candidate will be re-examined if it is found that they have submitted an Comparative Matrix and/or supporting material any part of which is not their own work.”*
 |  |
| **I****Appendix 2 – Appeals**New sections 1.2.3 and 1.2.4 have been added. Section 4.1 has also been amended to reflect a separation of duties to meet with best governance practice: the Chair of the Prescription Committee is now independent of the Appeals Panel.***1. Eligibility and Grounds for Appeal****1.1 A candidate who has notification under section 2.8.2 of failure to pass the examination may appeal to the Board to review the Registrar’s decision.**1.2 Candidates may lodge an appeal on any of the following grounds:**1.2.1 Defects or irregularities in the conduct of the examination and/or examination process that had a materially adverse effect on the candidate’s performance.**1.2.2 Special circumstances (by way of example illness, family bereavement etc.) which were not known to the examiners at the time of examination and the candidate can show good reason why such circumstances could not have been made known to the examiners at the time of the examination.**1.2.3 Academic decisions made by examiners on different occasions will reflect a judgment made about a number of factors, including candidate performance, supporting documents etc. and are therefore not subject to appeal.**1.2.4 Disagreement with the decision or feedback provided does not constitute grounds for appeal. Any feedback or other comment represents the individual view of the person giving it and, whilst given in good faith, does not commit the Board or any other individual thereafter.* ***2. Lodging an Appeal****2.1 An appeal must be lodged within 30 days of notification of the failure being sent to the candidate. It should be addressed to the Chair of the Prescription Committee. The appeal must be in writing, and should include the following:** *full details of the circumstances relevant to the ground(s) of the appeal; and*
* *the reasons as to why the candidate considers that those circumstances justify the decision of the Registrar being annulled. The candidate should also enclose copies of any relevant documentation that they wish to be taken into account.*

*2.2 Supporting Material is not reconsidered at appeal and must not form part of a submission.* ***3. The Chair of the Prescription Committee****3.1 On receipt of the appeal, the Chair of the Prescription Committee may request such other documentary evidence/comments from the examiners, the independent examiner(s) and the Registrar as may be relevant.**3.2 If the Chair of the Prescription Committee is satisfied that the information provided by the candidate does not raise any of the grounds of appeal set out above, or raises any ground of appeal which is bound to fail, he/she may rule that the appeal (or any specified ground of appeal) is rejected. The reasons for the decision will be conveyed in writing to the candidate.**3.3 Unless the Chair of the Prescription Committee decides that the appeal is rejected, the appeal will be referred to the Board’s Examination Appeals Panel. The candidate will be notified in writing that the matter is to be referred to the Appeals Panel, and will be invited to make any additional written representations for the Appeals Panel to consider. These must be received within 14 days of the notification being sent to the candidate.****4. The Board’s Examination Appeals Panel****4.1 The Board’s Appeals Panel will consist of three members of the Board, nominated by the Prescription Committee. At least one member of the Appeals Panel will be an elected member of the Board, and at least one member will be an appointed member of the Board.****5. The Decision of the Appeals Panel***5.1 *If the Appeals Panel decides that the appeal should be upheld, it will recommend to the Registrar (with written reasons) that the candidate be re-examined.**5.2 The Registrar will consider the Appeals Panel recommendation, and may either accept it or refer the case to the next full meeting of the Board for consideration and decision.**5.3 If the application is one for registration and, following appeal, the Registrar remains not satisfied that a candidate is entitled to be registered, the Registrar shall, unless the candidate agrees otherwise, refer the application for registration to the Board at its next meeting*.” |  |