



Board Meeting

23  
November  
2017

Agenda Item

9

**Subject** Business as Usual Review of the Criteria for the Prescription of Qualifications  
**Purpose** For Decision  
**From** Emma Matthews - Head of Qualifications & Governance

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## 1. Summary

To discuss the outcomes of the pre-consultation work in relation to the Criteria Review and the intended direction of travel of the reviews. To make strategic decisions regarding the next steps of the Review.

Once the direction of travel is known, ARB should engage with the Department for Communities and Local Government (DCLG) to ensure that any next steps on the review are clearly understood and that the Department's concerns around undertaking two reviews in succession, and destabilising the UK's position whilst exiting the EU and possible negotiations with the rest of the world, have been considered.

## 2. Recommendations

It is recommended that the Board:

- i. notes the summary of the pre-consultation feedback relating to the Criteria Review and notes the positions of the Quality Assurance Agency (QAA) and the Royal Institute of British Architects (RIBA);
- ii. agrees that the Criteria Task and Finish Group's recommendations should form the basis of the next steps of the review, i.e., the Criteria Task and Finish Group should review these areas of the Criteria;
- iii. agrees that either
  - a) ARB's Task and Finish Group should continue with its work, whilst ARB holds discussions with the RIBA to determine whether alignment between the Board's objectives and the Task and Finish Group's recommendations with the RIBA's aspirations can be achieved (Option 1); or
  - b) ARB pauses the 'business as usual' review of the Criteria, awaiting confirmation from the DCLG that it is satisfied that ARB's review of the UK routes to registration can commence (Option 2);

iv. notes that whichever option the Board agrees in iii., the ARB will need to engage with the Department for Communities and Local Government (DCLG) to ensure that any next steps on the review are clearly understood and that the Department's concerns around undertaking two reviews in succession, and destabilising the UK's position whilst exiting the EU and possible negotiations with the rest of the world, have been considered.

### 3. Open Session

### 4. Contribution to the Board's Purpose and Objectives

In delivering the Act, ARB's objectives are to 'protect the users and potential users of architects' services' and to 'support architects through regulation'.

In line with Section 4(1)a of the Architects Act 1997, the Board is responsible for determining what qualifications and practical training experience are required for entry to the Register under the UK route to registration. In order to ensure that individuals have met the appropriate standards on entry to the Register, the Board has established a prescription process for recognising qualifications and practical training experience as well as the criteria which must be met at the appropriate levels. The Criteria for the Prescription of Qualifications document set out the standards, attributes, knowledge, understanding and abilities that individuals must meet before the end of each of the levels required for registration. The Criteria are therefore important in terms of assuring the users and potential users of architects' services that individuals who are on the Register have the appropriate minimum levels of skills and experience. The Criteria also provide information to students and institutions in terms of the areas that must be met in order to demonstrate competence to enter the Register.

### 5. Background

#### i. The Board's Objectives

At its meeting on 12 May 2017, the Board approved the following high level objectives for a 'business as usual' review of the Criteria for the Prescription of Qualifications:

Any revised or updated criteria should enable the Board to:

- Continue to discharge its functions under Section 4(1)a and 4(1)b of the Architects Act 1997;
- Ensure that competent individuals are admitted to the Register on completion of their studies and practical training experience, i.e., setting the standards for entry under the UK route onto the Register; and
- Ensure that the criteria meet the requirements of the Mutual Recognition of Professional Qualifications Directive so that the UK's qualifications can continue to be listed under Annex V of the Directive.

The Board additionally agreed in principle that it wished to continue to hold the

Criteria in common with both the RIBA and QAA, but that any revised Criteria would need to meet the Board's agreed high level objectives.

The Board noted and agreed that the review of the Criteria must be based on the current requirements for entry to the Register which state that individuals must hold Part 1, Part 2 and Part 3 qualifications. It was noted that this element could not be reviewed until the DCLG had confirmed that the Board could progress a review of the UK routes to registration.

ii. **Review Phases and Timeframes**

At its meeting on 13 July 2017, the Board agreed the outline project phases and timeframes. A copy of the project phases and timeframes can be found at **Annex A**. The Board has received regular updates regarding the progress of the review at recent meetings. A pre-consultation exercise has been undertaken, whereby we sought feedback from a wide range of stakeholders through a series of round table meetings and an on-line survey. We also met with/spoke to and received feedback from a series of key stakeholders including the co-owners of the Criteria, the Royal Institute of British Architects (RIBA) and the Quality Assurance Agency (QAA). The first phase of the review has now been completed and the Task and Finish Group has considered the information which was gathered through the pre-consultation. A summary of the outcomes of the pre-consultation phase, including data about the number of responses, can be found at **Annex B**.

iii. **Task and Finish Group Recommendations**

The Task and Finish Group has prepared the following advice to the Board:

'The following are the recommendations of the Criteria Task and Finish Group, made after considering the results of the consultation on the current Criteria and Procedures.

Parts 1 & 2

We agree with the argument of many of the consultation participants that the current way that the Criteria are described, via three sub-points, encourages them to be interpreted too prescriptively. However, we also consider that using the 11 Criteria with no further elaboration is unlikely to provide the ARB with adequate information on which to base regulatory decisions, and Schools and other users with sufficient guidance about the basis on which those decisions will be made. There is a significant risk that this would increase the ARB's volume of work, increase the scope for disagreements, and make it more difficult to ensure a consistent standard.

We therefore recommend that the sub-points set out beneath the 11 Criteria are

replaced by succinct statements on the interpretation of each criterion, providing enough information to support consistency and effective regulation while allowing for innovation and for distinctiveness between courses. These statements need to be developed carefully in order to strike the right balance between consistency and flexibility. As at Part 3 they might contain both mandatory and indicative or exemplar elements.

We also favour differentiating the way that the Criteria are described at Part 1 and Part 2 in order to reflect the different levels of understanding and application that are required, in a way that is consistent with levels 6 and 7 respectively of the Framework for Higher Education Qualifications. A tabular summary of the Criteria at Part 1 and Part 2 (and possibly extending to Part 3) highlighting the differences in what is needed would make the progression and change in level between the Parts clearer.

If the above recommendations are accepted, we consider that a separate set of Graduate Attributes are no longer necessary to distinguish between Parts 1 and 2. However, we recommend that a preamble is included for each Part that provides a more holistic summary of what the relevant Part requires, again in a way that reflects the appropriate academic level. The preamble should be written in a comparable format across Parts 1, 2 and 3.

We note the many suggestions in the consultation for various areas of content to be added or emphasised at Part 1 and particularly Part 2, for instance in relation to sustainability, accessibility, health and safety, conservation and adaptation of buildings, and professionalism and business considerations. We recommend reviewing content as part of revising the detail at Parts 1 and 2, to ensure that courses and examinations are up-to-date and take account of the needs of practice.

### Part 3

We broadly support the findings in the consultation that little change is needed to the structure and content of Part 3. A review of the detail of Part 3 is recommended to ensure that the indicative content is up-to-date, and if necessary to reformat the preamble to ensure consistency across Parts 1, 2 and 3.'

#### iv. **Holding the Criteria in Common with the RIBA and the QAA**

The Board will be aware that the Criteria at Part 1, Part 2 and Part 3 are held in common with the RIBA and the Criteria at Part 1 and Part 2 form the core of the current QAA Subject Benchmark Statement in Architecture.

#### QAA's Position

Following a discussion with the QAA has confirmed that a further discussion in relation to the Subject Benchmark Statement should take place once ARB has decided on its way forward in relation to the review of the Criteria.

## RIBA's Position

Following our meeting in October, the RIBA formally confirmed that it had undertaken its own review of architectural education and that it now wishes to see:

- the removal of all the sub-clauses under each of the 11 points of the Professional Qualifications Directive at both Part 1 and Part 2;
- retain the Graduate Attributes, or a modified version of them; and
- elements of the Part 3 Criteria embedded within the Part 2 level Criteria.

The RIBA also wishes to see institutions developing seven year integrated qualifications in architecture which lead to registration.

## Views of other key stakeholders

Whilst the views of a number of stakeholders were received via the pre-consultation, the Board's attention is drawn to the following which have been provided by two of ARB's key stakeholders who are involved in the design and delivery of prescribed qualifications in architecture:

The Association for Professional Studies in Architecture (APSA) has confirmed that it believes removing the detail, i.e., the sub-criteria etc., from within the Criteria would be detrimental but noted that any revised descriptors should be guidance rather than mandatory. APSA also favour retaining the Graduate Attributes, but simplifying them and making them more clearly indicators of level rather than what could be interpreted as additional criteria. APSA suggested that emphasis was currently placed on design and visual representation at the expense of the management aspects of architecture, and included detailed proposals for content in its representation. APSA does not support the RIBA's approach.

The Standing Conference of Heads of Schools of Architecture (SCHOSA) has confirmed that 'SCHOSA fully supports the RIBA proposal for the removal of all the sub-clauses under each of the 11 points of the EU PQD as part of the ARB review of its criteria. This would align the UK with the EU and facilitate exchange of architects, staff and students.'

## Possible Next Steps

Given the situation, the Board may wish to consider the following options:

### Option 1

ARB's Task and Finish Group could continue with its work but in parallel ARB could hold discussions with the RIBA to determine whether alignment between the Board's objectives and the Task and Finish Group's recommendations with the

RIBA's aspirations can be achieved.

This option would allow for additional, more in-depth discussions between ARB and the RIBA so that the respective positions and objectives of both organisations are better understood. This should not delay the review of the Criteria but could ensure that every effort has been made to retain a common set of Criteria, which stakeholders would prefer.

This option could also lead to the Criteria continuing to form the core of the QAA subject benchmark statement.

## Option 2

ARB could pause the 'business as usual' review of the Criteria, await the DCLG's agreement that the routes to registration review can commence and then undertake a wider scale review which could properly look at the competences required of a modern day architect, the alternative models of architectural education and the Criteria that would deliver this.

The Board will be aware that its wider ranging review of the UK routes to registration is currently on hold in accordance with advice received from the DCLG and until the DCLG is confident that any changes to the existing requirements for registration/the prescription process will not impact on the UK's departure from the EU/the development of potential mutual recognition agreements with countries around the world. It is likely that things will become clearer regarding the UK's departure from the EU during the latter part of 2018 and that the Government will know what the position regarding the Professional Qualifications Directive will be by then. If the Board continues with its current review, there is a risk that as soon as this 'business as usual review' is complete, another review will begin. In this scenario, ARB would be implementing new Criteria in 2019, which would be likely followed by another set of new Criteria a year (or two) later. This would be difficult to implement and confusing for institutions/students. It may therefore be proportionate to pause the current review of the Criteria and start the wider routes to registration review immediately that the UK is clearer about its departure from the EU. This would provide the Board with time to undertake detailed research into what competences an architect needs/whether changes to the current UK minimum duration of study/practical training experience could be reduced or streamlined in the interim so that an informed review could begin.

- v. The Board is asked to discuss the positions outlined above. The Board will need to decide whether to progress with its review of the Criteria and request that Staff hold further discussions with the RIBA in parallel to determine what potential there is for developing a set of common revised Criteria that will enable the Board to continue to fulfil its statutory obligations, meets its objectives for the Review and will align with the Task and Finish Group's recommendations; or to pause the review and undertake a wider ranging review of the UK routes to registration, commencing in late 2018 (subject to the DCLG's support for this).

In terms of the first option, the Board is asked to discuss the Task and Finish Group's recommendations. Subject to the Board's agreement with the Task and Finish Group's suggested direction of travel, the Board is asked to note that the Task and Finish Group will be reconvened following the Board meeting and will continue with the work of reviewing the Criteria document. The Staff will additionally, and in parallel meet with the RIBA to discuss each respective bodies' views in greater detail. If an alignment between ARB and the RIBA can be achieved, ensuring that the Board's statutory functions can continue to be delivered; the Board's objectives and the Task and Finish Group's recommendations can be accommodated, then a separate ARB/RIBA Working Group could be established to develop a common set of Criteria. In this scenario, ARB would retain its own Task and Finish Group in an advisory capacity and would nominate some of the Group members to participate in the ARB/RIBA Working Group

If the Board decides that the current review should be paused and that it wishes to wait until it can commence the review of the UK routes to registration, the Board is asked to consider and agree whether it would be prudent to undertake further research in order to prepare for that review.

Irrespective of the option the Board agrees to pursue, the Board's decision will be subject to the DCLG being briefed on ARB's direction of travel to ensure that its proposed plans are clearly understood by the Department and to ensure that that the DCLG is comfortable that the Board is likely to be undertaking two reviews in succession, the review will not destabilise the UK's position whilst it exits the EU and possible negotiations with the rest of the world are discussed.

## 6. Resource implications

The Board has already set aside money for a review of its UK routes to registration, which encompassed a review of the criteria. As previously agreed, some of the money allocated for the routes review is being used to cover the costs of reviewing the criteria. The next steps outlined above are felt to be proportionate and should be manageable within the available budget. If, however, the project is likely to run over budget, the Board's attention will be drawn to this at the earliest opportunity. Considerable staff time will be needed to support the Task and Finish Group in order to deliver a revised set of Criteria for the Board's consideration in the Spring 2018.

## 7. Risk Implications

We have prepared a bespoke risk register for this review which was presented to the Audit Committee in October 2017. The Criteria Task and Finish Group has also been made aware of the risk register. We will continue to identify any new or changing risks as the review progresses. One of the key risks we have identified is that at first sight, the RIBA's current proposals do not appear to align with the Board's objectives in respect of its 'business as usual' review of the Criteria and appear to go beyond the scope of the current review.

Further discussions with the RIBA at this stage are likely to facilitate a better understanding of each organisations' position and could ultimately help to ensure a common set of revised Criteria are developed. However, if the objectives of each organisation cannot be aligned then the Board may be in a position whereby it has to progress its review independently.

The Board will need to ensure that it can continue to fully discharge its statutory functions both under the relevant sections of the Act. Amongst other things, the criteria set out the processes that the Board uses to ensure qualifications are meeting the appropriate standards and cover the relevant subject areas, as well as ensuring that competent individuals are eligible to join the Register. The Board will need to take care to ensure any revised criteria will continue to fulfil these objectives. Failure to do so may result in the Board being unable to undertake its duties effectively, could lead to a lack of transparency and ultimately could lead to incompetent individuals joining the Register.

The Board will need to be aware that any changes to the criteria for the prescription of qualifications could impact on the revision of the criteria and/or have an unintended impact on the Prescribed Examinations which may lead to a lack of synergy between the processes in the future. It will be necessary to understand the impact that any proposed changes will have on other elements of ARB's existing policies, processes and procedures. The Executive will monitor this as the reviews progress.

The Board will need to ensure that it properly consults all relevant stakeholders in accordance with its consultation policy. All stakeholders should be given the opportunity to contribute to and comment on the development of any revised criteria before the Task and Finish Group commences its work as well as on the proposals the Board agrees for consultation. Failure to do so could result in reputational damage and a lack of buy-in by key stakeholders. All stakeholders have had the opportunity to contribute to the pre-consultation process, which was widely publicised and open from early September until early October. A full consultation exercise is planned once any revised document has been reviewed by the Board in Spring 2018. [Note: feedback gathered which is more appropriate for the Routes to Registration review will be held on file until the Board progresses with this review.]

As noted above, whilst we believe the timeframes for delivery of the review are achievable, they do not allow for any contingency. The timescales set out for latter stages of the review may therefore be impacted by various factors, including the Board's decisions in relation to the direction of travel in November 2017 and/or any decisions it reaches in February/May 2018, and there may be slippage.

## 8. Communication

ARB is committed to regularly reviewing its policies and procedures and has commenced a 'business as usual' review of its procedures for the prescription of qualifications. ARB will wish to continue to fully engage with and consult a wide range of stakeholders throughout the process. Regular updates have and will be provided to both the Board and its stakeholders as the project progresses. We have a dedicated website page which will cover this: <http://www.arb.org.uk/criteriaproceduresreview/>



We developed a communications plan for phase 1 of the review and are in the process of updating this for the next phase of the review. The plan outlines how communications with stakeholders will be managed throughout the review. The Task and Finish Group will also be made aware of the updated communications plan and be invited to assist in developing it as the review moves forward.

A summary of the information gathered through the pre-consultation phase will be added to the website link referred to above.

## 9. Equality and Diversity Implications

Equality and diversity implications are being taken into account as part of the review and equality impact assessments were prepared in relation to the existing Criteria.

The outcomes of the impact assessment were provided to the Task and Finish Group at its initial meeting.

The Board will need to ensure that any revised criteria meet ARB's objectives in this area.

## 10. Further Actions

Subject to the Board's decisions above:

The DCLG should be briefed on the Board's direction of travel to ensure that its proposed plans are clearly understood by the Department and to ensure that that the DCLG is satisfied that the review will not destabilise the UK's position whilst it exits the EU and possible negotiations with the rest of the world are discussed.

### Option 1

Subject to the DCLG confirming its satisfaction, the Criteria Task and Finish Group will need to be reconvened as soon as is practicably possible and instructed to undertake the next phase of the review in line with the Board's agreed direction of travel and the Criteria Review project plan.

Staff will commence more detailed discussions with the RIBA in parallel to the Task and Finish Group continuing its work. Staff will provide updates to the Board as discussions progress. If satisfactory progress is made, and both organisations' objectives can be met, then an additional working group could be established to take forward the development of a common set of Criteria.

Updates to the dedicated website page relating to the Criteria review will need to be made and key stakeholders will need to be made aware of the outcomes of the Board's discussions.

Option 2

The work of the Criteria Task and Finish Group will be paused.

Updates to the dedicated website page relating to the Criteria will need to be made and key stakeholders will need to be made aware of the outcomes of the Board's discussions.

Staff will commission research which will feed into and support a review of the UK routes to registration.

**ARB Criteria Review**

**Objectives**

Any revised or updated criteria should enable the Board to:

- Continue to discharge its functions under Section 4(1) a and 4(1) b of the Architects Act 1997;
- Ensure that competent individuals are admitted to the Register on completion of their studies and practical training experience, i.e., setting the standards for entry under the UK route onto the Register; and
- Ensure that the criteria meet the requirements of the Mutual Recognition of Professional Qualifications Directive so that the UK’s qualifications can continue to be listed under Annex V of the Directive.

The Board additionally agreed in principle that it wished to continue to hold the Criteria in common with both the Royal Institute of British Architects and Quality Assurance Agency, but that any revised Criteria would need to meet the Board’s agreed high level objectives.

The Board agreed that the review of the Criteria must be based on the current requirements for entry to the Register which state that individuals must hold Part 1, Part 2 and Part 3 qualifications. It was noted that this element could not be reviewed until the DCLG had confirmed that the Board could progress a review of the UK routes to registration.

**Stages of the review/timescales**

Activity	Timescale
Executive to undertake a wide ranging pre-consultation exercise and gather information/evidence from ARB’s stakeholders, including holding initial discussions with Royal Institute of British Architects (RIBA)/Quality Assurance Agency (QAA)	August – October 2017
The Registrar, Head of Qualifications and Governance and ARB Chair to appoint and establish an ARB Task and Finish Group to undertake the review	August - October 2017

ARB's Task and Finish Group to undertake an initial analysis and review of information gathered from pre-consultation exercise and evidence gathering stage	October 2017 – November 2017
ARB's Task and Finish Group/the executive to provide updates to the Board.  The Board to take decisions regarding the direction of travel of the review, including whether to continue to hold the criteria in common with the QAA and the RIBA and whether to include the QAA/RIBA representatives within the membership of the Task and Finish Group	23 November 2017
Task and Finish Group to develop revisions to the criteria	November 2017 – January 2018
Presentation of draft revised criteria to the Board. If approved, issue for consultation	February 2018
Consultation period	Late February 2018 – Late May 2018
Consideration of consultation feedback by Task and Finish Group  Formulation of recommendations to the Board	June 2018
Consideration of consultation feedback and Task and Finish Group's	July 2018

<p>recommendations by the Board</p> <p>Approval of revised criteria by the Board</p> <p>The executive to communicate the details of the transitional implementation phase of revised criteria to stakeholders</p>	
<p>Criteria become effective for the purpose of prescribing qualifications and practical training experience</p>	<p>September 2019</p>

## Item 9 (Criteria Review) - ANNEX B

ARB Review of the Criteria and Procedures for Prescription

### **Summary of the response to the consultation on the current Criteria and Procedures**

16th November 2017

(final version)

*Stan Lester*

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## **Summary**

Key points emerging from the ARB's consultation in the current Criteria and Procedures were as follows:

### **The Criteria**

At Parts 1 and 2, there was debate as to whether the sub-criteria below the 11 points should be removed entirely, substituted by something clearer and more concise, or retained with some tidying up. A fairly well-supported view emerged that the Criteria should be differentiated between the two Parts to reflect progression and a change in level. The value of the Graduate Attributes was also debated, with an argument in favour of discarding them if the Criteria are differentiated; alternatively, if the Criteria are not revised in this way, one suggestion was to revise the Attributes so that they become more specifically level indicators.

Various suggestions were made for adjustments to the detailed content at Parts 1 and 2, with the main themes being incorporation of more on professionalism and practice ('Part 3 material'), sustainability, safety and risk assessment, design for accessibility, working with existing structures, and conservation.

At Part 3 the existing approach was generally favoured, with clarification on what is mandatory and what advisory, along with minor updating.

### **The Procedures**

Greater clarity on what is required for initial prescription, annual reporting, renewal and course changes was a recurring theme, along with examples and sharing of good practice. Consistency between ARB, RIBA and QAA requirements and timescales was also requested, along with a reduced burden on Schools.

There was some support for removing the renewal process in favour of (rigorous) annual monitoring, perhaps with use of external examiners' reports and samples of students' work. Otherwise, the length of prescription was thought to be about right or slightly too short.

### **Equality matters**

The Criteria and Procedures themselves were not flagged as having an impact on entrants in terms of disadvantaging those with protected characteristics, although it was noted that greater diversity could be encouraged through the way that architects were depicted. The main matter raised was a lack of emphasis in courses on design for accessibility.

## Introduction

The Architects Registration Board is currently undertaking a review of the Criteria and Procedures for the Prescription of Qualifications. The scope of the review is limited to changes to the Procedures and modifications to the detail of the Criteria. It is outside the remit of the review to change (a) the structure of qualifying routes in architecture, (b) the responsibilities of the ARB, or (c) the 11 criteria used at Parts 1 and 2 that are specified in the European directive on the mutual recognition of professional qualifications (2005/36/EC). The Graduate Attributes and the way the Criteria are described at Parts 1 and 2, and the Criteria at Part 3, are open to review.

During September 2017, the ARB held a consultation on the current Criteria and Procedures as the first stage of the review. The consultation consisted of an invitation to comment, principally by way of an online questionnaire but also open to unstructured representations; and a series of round table meetings held in five locations in the UK, open to architects, architectural academics, related stakeholders, and in separate sessions to students. Invitations to comment and to join the round tables were made via the ARB web site, social media, and mass email to relevant groups and individuals.

In total 170 people responded via the questionnaire, one sent in a relevant academic paper, and four representations were received on behalf of interested groups (RIBA, SCHOSA, APSA, and the ARB Prescription Committee). 43 attended the round table meetings. The Prescription Committee response is not included in this summary but should be read separately. Tables 1 and 2 provide a breakdown of participants in the consultation.

*Table 1: consultation participants by role*

	Questionnaire <sup>1</sup>	Round tables	Representations	Total	Percentage
<i>Total</i>	170	43	4	217	
Architects (including academics)	143	35	1	179	82.5%
Students/part-qualified	7	6		13	6.0%
Allied professionals	8 <sup>2</sup>			8	3.7%
Associations and regulatory	8		3 <sup>3</sup>	11	5.1%
Other stakeholders		2		2	0.9%
Public	4			4	1.8%

<sup>1</sup> The numbers responding to any particular question were substantially less: a maximum of 126 to any of the Procedures questions, and 37 for the Criteria.

<sup>2</sup> Including some who have some training in architecture

<sup>3</sup> These are group rather than individual responses, excluding the ARB Prescription Committee.

*Table 2: consultation participants by location*

	Questionnaire	Round tables	Representations	Total	Percentage
<i>Total</i>	170	43	3	217	
England	135	16	1	152	70.0%
Wales	7	3		10	4.6%
Scotland	18	6		24	11.1%
Northern Ireland	9	18		27	12.4%
UK/general			3	3	1.4%
Other	1			1	0.5%



This paper consists of an overall summary of the responses to the consultation. Its purpose is to inform decision-making about how to proceed, rather than provide detailed feedback on potential changes to the Criteria and Procedures; the more detailed analysis of the questionnaire survey and round table meetings, and the representations, are available for the second purpose.

Questionnaire and other written responses were collated and then analysed to provide a summary of key points raised along with the frequency that equivalent or similar points were made. Notes were made of the round table discussions and points raised collated and analysed under key headings in parallel with those for the written responses. The sources of evidence are indicated as survey/written, from the round tables, and on behalf of the interested groups. This report excludes matters that are outside the scope of the review, and necessarily makes assumptions in order to condense the raw responses into a coherent summary. It does however attempt to be an accurate reflection of the balance of opinion about the matters within scope of the review.

Because of the dominance of responses from architects and architectural students/part-qualified personnel, it would be misleading to attempt a breakdown by respondents' roles.

Collation and notes from the round tables were produced by ARB staff, and the analysis and reporting was carried out by the project consultant, who also facilitated the round table meetings.

## **1. The Criteria**

### **The structure and detail of the Criteria at Parts 1 and 2**

Currently, the General Criteria are each supplemented by a set of three bullet-point statements that apply equally to Parts 1 and 2.

Half the questionnaire respondents favoured keeping the Criteria as they are, and half an alternative approach such as having them underpinned by learning objectives or a general explanation, or removing the detail below the 11 headings. The written survey responses were balanced between those favouring the current approach, having less detail, and (a small minority) expanding the points in some of the criteria. Several responses commented that the sub-points make the criteria over-detailed and too complex, and undermine holism particularly in relation to mapping course objectives. There were also comments on the need to make them clearer and more concise.

In the round tables, there was widespread though not universal criticism of the detail beneath the Part 1+2 criteria. This encompassed questioning the need for any form of detail other than the 11 points; a preference for fewer points overall or a simple description (as opposed to bullet-points); and more general criticism of the complexity and language of the criteria. The logic behind having 3 points per criterion was questioned; some points were viewed as repetitive, while others contained multiple objectives. On balance there was a common view that the way the Criteria are described needs to be tidied up and made more precise and concise.

The representations from RIBA and SCHOSA favoured removing any detail below the 11 points, while the independent representation commented that the Criteria are described in a way that is too

detailed, with many of the sub-points containing multiple objectives. The APSA response considered that removing the detail would be detrimental, while preferring it to be treated as guidance (as with the detailed points at Part 3) rather than mandatory. Similarly, some round table participants thought that a lack of supporting detail would undermine consistency and rigour.

In summary, there is a range of opinion between maintaining the status quo (though this is much less in evidence from the qualitative comments), improving the language and consistency of the sub-points (which appears to be a minimum), substituting another (generally less detailed) approach rather than the current bullet-points, and removing any detail under the sub-points entirely. The way that Parts 1 and 2 are differentiated also needs to be taken into account in making any decision in this area.

### **Differentiating Parts 1 and 2**

Currently, Parts 1 and 2 are differentiated via the Graduate Attributes, with the 11 General Criteria being described in the same way for both Parts.

In the survey, opinion was split with a slight majority in favour of differentiating the two Parts via the Criteria, versus the status quo; the qualitative comments generally favoured this approach, as did the round tables. While a few participants argued for common Criteria, there was a well-supported view that differentiated Criteria would provide a more realistic reflection of students' progression and make clearer what is needed at Part 2 as opposed to Part 1. Accepting this argument implies that the Criteria need to be described differently at Part 1 and Part 2, whether via sub-points, learning objectives, or a simple sentence for each criterion at each of the two Parts. Some participants indicated that Part 2 should be clearly at master's level, and this should be reflected in the criteria.

Participants who favoured differentiated Criteria were split between whether this then obviates the need for the Graduate Attributes, or whether the Attributes are still useful. The former view was stronger in the round tables, where the majority of relevant comments suggested that they should be discarded. There was however a minority view that the Attributes are useful and should be retained, possibly with some revisiting for language and clarity or (one respondent) wording in a similar way to the preamble to Part 3. The APSA response favoured retaining the Graduate Attributes, but simplifying them and making them more clearly indicators of level rather than what could be interpreted as additional criteria.

On balance, the arguments that were put forward favour differentiating the Criteria between Parts 1 and 2. However, if the argument for having no embellishment to the basic 11 Criteria is accepted, this forestalls differentiation unless a compromise is adopted such as a short description of each criterion as it applies at each of the two levels. Alternatives include revisiting the Graduate Attributes or using some form of scale such as awareness through to application or novice to expert.

### **The content at Parts 1 and 2**

Detailed comments were made about improving or updating the content at Parts 1 and 2. The analyses of the round table comments and survey responses set these out in detail against each of the Criteria, but recurring themes included:

- Bringing in some of the content of Part 3 to Part 2 and even Part 1, including more on ethics, professionalism, and the commercial and legal/regulatory aspects of design.
- More emphasis on sustainability, health and safety/risk assessment, design for accessibility/disability, working with existing structures, and conservation.
- Emphasising the holistic use of design projects as a means of meeting all the criteria.

APSA suggested that emphasis was currently placed on design and visual representation at the expense of the management aspects of architecture, and included detailed proposals for content in its representation.

Several comments were also made that indicated where there should be differences between Part 1 and Part 2.

### **Part 3**

On balance, few problems were reported at Part 3 compared with Parts 1 and 2. Most comments favoured the existing approach, with a few tweaks in terms of clarifying the difference between mandatory and advisory content, and checking that the detailed guidance was up-to-date. APSA suggested that a more active, aspirational and self-critical professionalism should be reflected in Part 3. Some specific comments on content were also made by survey respondents. These responses suggest maintaining the current structure of Part 3 while reviewing the detail and wording.

### **Additional comments**

While likely to be outside the scope of the current Review, some comments were made on having a less restrictive relationship between Parts 1 and 2, for instance enabling institutions to provide exemption from Part 1 via APL/APEL, not requiring anyone successful at Part 2 to take Part 1, and opening up the Part 1 examination to a wider range of applicants (e.g. as an alternative to, rather than a double-check on, a non-prescribed course). A further modification that attracted some support was to absorb Part 3 into Part 2, and while this was appreciated as beyond what can be done at present it was seen as a longer-term goal that needs to be considered in relation to any revision to the Criteria or Graduate Attributes at Part 2.

## **2. The Procedures**

### **The initial prescription process**

The survey attracted a large number of responses in relation to initial prescription, while it was discussed in three of the five round table meetings. Key points made were:

- The need for consistency between ARB, RIBA and QAA requirements.
- Greater clarity on what is required: wording of the Procedures booklet, more guidance on what needs to be submitted, use of a template or proforma, and sharing of good practice.
- More human interaction, such as contact with ARB staff, a compulsory planning meeting, or a 'critical friend' to support the application process particularly for first-time applicants.

Two (practitioner) participants also suggested having a compulsory process for showing support from practices, and some more specific points were made in the survey responses.

On balance the call for improved clarity appears to suggest reviewing documentation and what evidence is required, without necessarily making any substantial changes to process.

### **Annual monitoring and renewal**

The survey responses were substantially (two-thirds or more) against change to the monitoring and renewal processes, although survey comments and the round tables suggested that improvements could be made. Key points were:

- Better linkage between ARB, RIBA, QAA, internal QA and external examiners – in terms of co-ordinating timing, each organisation taking account of the others' processes, maybe a single report.
- Use of evidence by ARB such as sampling students' work or having external examiners' reports.
- A proforma for making returns (the current system was viewed as too open-ended).

There was also some support for abandoning the renewal process given sufficiently rigorous annual monitoring, with one participant suggesting the converse i.e. retaining renewal without annual monitoring.

Questionnaire respondents were asked about the time period for prescription. On balance 4-5 years was favoured, more in favour of five years and some simply stating 'longer'. Apart from the removal of renewal in favour of annual monitoring, an alternative suggestion involved taking a risk-based approach.

### **Course and title changes**

Two main points were made here: clarification and examples of what constitutes a minor change (inform and go ahead) and a major change (seek permission), and a clearer timescale for the ARB response.

## **3. Equality matters**

The main comment relating to groups with protected characteristics was that there is insufficient attention to design for universal access/for disabled users. This was also a common theme as previously reported relating to the content of Parts 1 and 2.

Further matters that were raised included representing greater diversity in pictures of architects; grading systems that better reflect the range of skills needed to be an architect, as opposed to emphasising drawing; and better attention to the views of students in order to reduce bullying and intimidation.