



Subject Proposed changes to the Prescribed Examination procedures
Purpose For Decision
From Rob Jones, Head of Registration

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1. Executive Summary

The Prescribed Examination (the Exam) is the method by which we enact Section 4(1)(b) and 4(2) of the Architects Act 1997 (the Act):

(1) A person who has applied to the Registrar in the prescribed manner for registration in pursuance of this section is entitled to be registered [in Part 1 of the Register] if—

(a) he holds such qualifications and has gained such practical experience as may be prescribed; or

(b) he has a standard of competence which, in the opinion of the Board, is equivalent to that demonstrated by satisfying paragraph (a).

(2) The Board may require a person who applies for registration on the ground that he satisfies subsection (1)(b) to pass a prescribed examination in architecture.

This section of the Act has the purpose of establishing whether an individual with a non-prescribed qualification should have their qualification treated as equivalent to an ARB prescribed qualification for the purposes of Registration.

The Board is asked to note the outcomes from the pre-consultation exercise for the business as usual review of the Examination Procedures (Exam procedures) which underpin the Exam, and agree to go out to consultation on the proposed changes.

We will be providing an overview on the role and function of the Exam to the Board at the Board meeting on 9 December 2019 and prior to this item being considered.

2. Recommendations

It is recommended that the Board agrees:

- i) To send the changes to the Exam procedures at Annex A out to consultation (a clean version can be seen at Annex B and the previous version at Annex C); and
- ii) To publish the revisions to the Exam procedures on the ARB website for period of four weeks to allow any interested parties the opportunity of providing any representations

they wish to make in relation to the changes, at the first appropriate opportunity following the election period. As these are business as usual changes, and aspects of the current Exam procedures are now inoperable following changes to the governance structure, we do not consider it appropriate or necessary to run a full three month consultation period.

3. Key Points

- i. At its September 2017 meeting, the Board agreed that a business as usual review of the Prescribed Examination should be undertaken and included in the Business Plan for 2018. The actions for the review were set as:
 - Explore whether the procedures remain fit for purpose following completion of the Criteria/Procedure reviews
 - Explore whether the eligibility requirements remain fit for purpose
 - Explore whether the process is efficient and robust in offering assurance that those who pass the exam have equivalent competence to a person undertaking an ARB prescribed qualification at the appropriate level

And the measures of success set as:

- Exam procedures tested to ensure consistency with the outcomes of the Criteria for the Prescription of Qualifications (the Criteria)/Procedure for the Prescription of Qualifications review and amended where necessary.
 - Engaged with all stakeholders and kept them informed of progress as the review develops.
 - Procedures tested to ensure that where possible, costs to the candidate are minimised as far as possible.
 - Steps taken to ensure that any efficiency savings do not result in less assurance that the candidate is competent to the appropriate level
 - Specific measures of success for key areas of the project scope will be identified and agreed as part of the sign off process for the project plan.
- ii. At its May 2018 meeting, the Board noted the objectives for a business as usual review of the Exam. The Executive made a decision to commence the pre-consultation stage of the review prior to the completion of the Criteria review, but to check back in with the Criteria review before proceeding with any decisions relating to the Exam.

We noted at that meeting in May 2018 that we would be considering eligibility for the Exam, but only insofar as it does not destabilise ARB's current position that equivalence is measured through holding an equivalent qualification to those prescribed by ARB. A paper went to the Board in November 2016 explaining that to review eligibility for the Exam in isolation from the wider review of routes to registration would potentially destabilise current routes to the Register to an extent that would impact on our commitment to hold off on reviewing our routes to registration until further notice from the Ministry for Housing, Communities and

Local Government (MHCLG). The Board will be informed of the discussion that took place in November 2016 as part of the presentation at its meeting on 9 December 2019.

- iii. In June 2018, we commenced the pre-consultation process for the review of the Exam procedures to ensure that stakeholder views were taken account of. We notified our list of stakeholders, including the Royal Institute of British Architects (RIBA), the Standing Conference of Heads of Schools of Architecture (SCHOSA) of the pre-consultation exercise, ran a survey to which we received 25 responses, one roundtable event in Nottingham and two in London (one open to the public, one attended by examiners and independent examiners only), and held a consultation session with Prescription Committee. We also advertised the review on our website to encourage those who may not have been on our list of consultees to engage.

We have collated the responses we received and prepared an analysis which can be seen at Annex D.

- iv. Following the cessation of the review of the Criteria and the review of Procedures for the prescription of qualifications, it was decided that the business as usual review of the Exam should focus on ensuring that the process remains operable following changes to the governance structures within ARB.

The Board will recall that one of the reasons for the shift in position on the Criteria and Procedures reviews was that the preparatory and research work for a potential full review of routes to registration is to commence in 2020. As such, it was decided that whilst it was not the right time to review the Criteria in full, a review into two very specific areas around life safety (in response to the Hackitt review) and climate change was required immediately.

Following on from this decision, the Executive considered that making such significant changes to the Exam process, just prior to a full routes to registration review potentially commencing and before we know the outcomes of the pending review of two targeted areas of the Criteria (climate change and life safety), could lead to a process being created which is changed significantly very soon after it is introduced.

Whilst we acknowledge that the feedback from the pre-consultation exercise detailed at Annex D suggested wide ranging and far reaching change, we will ensure that this is not forgotten and forms part of the body of evidence we consider in the research phase of the routes to registration project scheduled to commence in 2020.

This review has now been completed and the main changes include:

- A switch from the process being overseen by the Prescription Committee to the Board. Independent Examiner reports will now be considered by the Registrar who will report to the Board at least annually and by exception if

- any issues arise that need immediate attention;
 - Appeals will be addressed to the Chair of the Board rather than the Chair of the Prescription Committee, with an appeals panel consisting of two Board members rather than three;
 - Reference to appointed and elected Board members removed;
 - Removal of the area of guidance which permits Royal Institute of British Architects (RIBA) to nominate persons to the Board for appointment. There was little comment on the role of RIBA in nominating to the pool of examiners in the pre-consultation exercise, though there was a strong feeling at the round table events that a skills based approach to appointments was appropriate and that this should be the primary measure for assessing suitability. In reality, this has not happened for many years and we have operated on the basis of an open recruitment exercise for all recent campaigns. As such, we propose removing this requirement from the procedures though will still ensure RIBA are informed of recruitment exercises and encouraged to share with members; and
 - An advisory limit of 60-80 pages of A3 (or equivalent) to portfolio submissions (excluding any bound written materials). This will form part of ARB's guidelines around submissions rather than forming part of the new procedures.
- v. We were asked during the pre-consultation exercise to provide more clarity on the eligibility requirements. Guidance has been drafted with the assistance of the advisors who assess eligibility and can be seen at Annex E.
- vi. We anticipate making efficiency changes to the Exam process but that these will not be reflected in the changes being made to the Exam Procedures document itself. We will instead ensure that the Exam Procedures leave it open to introduce changes to the guidelines we give candidates and examiners, and the operational procedures that support the process. Such changes may include the potential for portfolios to be submitted electronically and to reduce the use of paper in the process by providing candidate packs to examiners electronically. We will carry out an exercise in 2020 and prior to the budget being set in 2021 to establish where savings can be made.

4. Resource implications

There are no significant resource implications associated with revising the Exam procedures. We will however leave the possibility open for electronic submissions to be permitted and there will be costs associated with upgrading our systems to permit this. We recognise that there are some potential savings, including moving to provide paperless candidate packs to the examination panel, that could be made and passed on to candidates that sit outside of procedures but relate to the operation of the Exam and we will be exploring these as part of the 2021 budget plan. We will also consider more radical changes as part of our review of routes to registration once commenced, and in the event that the outcomes of Brexit drastically alter the numbers requiring access to the Exam.

5. Risk Implications

The changes proposed are limited and do not present a significant operational risk. There is a reputational risk associated with not acting on some of the more radical proposals that emerged from the pre-consultation exercise. However, it was considered that a number of the suggestions made, such as moving towards a two stage system to avoid candidates with little prospect of passing making long and expensive journeys to our offices would stretch the remit of a business as usual review, but will be factored into the future review of routes to registration.

It was also considered that making such significant changes prior to a full routes to registration review and before we know the outcomes of the pending review of two targeted areas of the Criteria (climate change and life safety), could lead to a process being created which is changed significantly very soon after it is introduced. Nonetheless, we recognise that many of the changes proposed in the pre-consultation exercise could potentially add value to the process and will be picked up within the main review of routes to registration.

6. Communication

We communicated the timeline for the review and the pre-consultation exercise on our website, to our list of consultees, via social media and through the e-bulletin. We will ensure the consultation exercise and any resulting amendments are communicated again through each of these channels.

We will also ensure that the outcomes of the pre-consultation exercise are not lost and that they feed into future discussions around routes to registration.

7. Equality and Diversity Implications

We have carefully considered the responses to the pre-consultation exercise about what we can do to ensure that the Exam does not disadvantage any group with protected characteristics. On the basis of the feedback received we shall seek to make our commitment to offering reasonable adjustments clearer to all applicants on the application forms and in guidance.

We have also considered the issues around English language testing and explored the perception that this could be considered discriminatory. The current procedures do leave it open for alternatives to International English Language Testing System IELTS to be submitted by candidates and we will work to ensure that our guidance that this is an option is clearer.

Other issues that have arisen in our consideration of equality and diversity issues associated with the examination include the cost of the Exam as an inhibitor and the lack of diversity within examination panels. Whilst both of these issues do not necessarily sit within the scope of a business as usual review of the Exam procedures, they are nonetheless important issues for us to consider when the budget is set for 2021 and when we next approach a recruitment/retention exercise. With regards the point about the lack of diversity within examination panels, we will consider revising the job description and what action we can take to ensure we receive applications from a wider section of society.

