

Board Paper

for Open session

Subject:

Registration Assurance Process and routes to the Register

Board meeting:

19 March 2026

Agenda item:

9

Action:

- For noting
- For discussion
- For decision

Purpose

To take final decisions on the introduction of a new Registration Assurance Process and three associated routes to registration and re-registration. It summarises the original proposals, presents the outcomes of the public consultation, and sets out recommendations for implementation and changes to the Registration Rules.

Recommendations

The Board is asked to

1. Note the consultation report at **Annexe A**;
2. Approve the introduction of a new Registration Assurance Process comprising:
 - **Route R** for qualified architects wanting to re-register after being off for more than two years, or who delayed registering for more than two years after qualifying
 - **Route P** for partially qualified professionals with accredited Part 2 and 3 qualifications but no Part 1;
 - **Route C** for architects removed from the Register for CPD non-compliance;
3. Approve the revised Registration Rules at **Annexe B** to implement these routes; and
4. Agree that the evidence requirements consulted on be adopted, including that a Personal Development Plan requirement for Route C.

Annexes

Annexe A – Consultation report

Annexe B – Draft Registration Rules

Author/Key Contact

Simon Howard, Director of Policy and Communications – simonh@arb.org.uk

1. Open Session

2. Introduction

- 2.1. The Architects Registration Board has a statutory responsibility under section 4 of the Architects Act 1997 to ensure that only those who are suitably competent are registered as architects. In exercising this responsibility, the Board may prescribe qualifications and other evidence of training and experience that demonstrate competence.
- 2.2. The Board has consistently stated that its objective is not only to maintain standards but also to ensure that competent professionals are able to access the Register through proportionate and transparent routes. Over time, a number of routes to registration and re-registration have developed which, while individually justified, now operate with different evidence requirements and assessment arrangements. This has created inconsistency and, in some cases, unnecessary complexity.
- 2.3. In October 2025 the Board agreed to consult on proposals to rationalise these arrangements through the creation of a single Registration Assurance Process (RAP). The RAP is intended to provide a single, coherent framework through which ARB can assess whether applicants who do not follow the standard qualification pathway nevertheless meet the same statutory standard of competence required for registration.
- 2.4. The objectives of the RAP are to ensure consistent assurance of competence across comparable applicant groups; remove unintended procedural barriers for competent professionals; improve transparency and predictability for applicants, and strengthen public protection through clearer and more structured assessment processes.
- 2.5. The RAP therefore represents a consolidation and improvement of existing regulatory approaches rather than the creation of new standards for registration. The competence threshold remains unchanged; the reform concerns how assurance is obtained.

3. Original proposals

- 3.1. The consultation proposed the creation of a unified Registration Assurance Process replacing elements of the Competency Standards Group model and integrating processes relating to re-entry and CPD returners. Within that framework, three routes were proposed.

- 3.2. The first, **Route R**, is intended for professionals seeking re-entry to the Register after more than two years, or who had delayed registration for a similar period after qualification. The proposal is that competence would be demonstrated through recent professional experience supported by a reference, or through a reflective statement evidencing how any gap in UK practice knowledge had been addressed, alongside a Personal Development Plan setting out how competence will be maintained and developed following a return to practice.
- 3.3. The second, **Route P**, introduces a new pathway for applicants holding accredited Part 2 and Part 3 qualifications but no accredited Part 1. The rationale is that such applicants may already have demonstrated competence through higher-level qualifications and professional experience, and that the statutory framework allows the Board to accept other evidence of training and experience in place of a prescribed undergraduate qualification.
- 3.4. The third, **Route C**, relates to architects who have been removed from the Register for non-compliance with the CPD scheme and wish to return. The proposal is that they must demonstrate their commitment to ongoing competence through submission of a Personal Development Plan covering the following year's learning.
- 3.5. The consultation also proposed amendments to the Registration Rules to give effect to these routes and to support the operation of a single assessor pool.

4. Consultation outcomes

- 4.1. The consultation ran from 22 October 2025 to 2 February 2026 and generated 85 responses from a mix of registered architects, prospective applicants, trainees and representative bodies. A notable proportion of respondents were individuals likely to be directly affected by the proposed new route for partially qualified applicants.
- 4.2. Overall, the consultation demonstrated strong support for the direction of travel. Across all three routes, clear majorities of respondents agreed that the proposals would create a more proportionate process and increase access to the Register. Support was strongest for the proposals relating to re-entry and partial qualifications, with slightly lower but still substantial agreement in relation to CPD returners. A majority of respondents also considered that the draft Registration Rules reflected the proposals accurately.
- 4.3. The qualitative feedback focused less on the principle of the changes and more on their practical application. Respondents sought clearer guidance on eligibility, the nature of acceptable professional experience, and how references would operate in practice, particularly in cases involving part-time work or overseas employment. There were also calls for transparent timelines and clearer documentation to support applicants.

- 4.4. Some respondents suggested additional forms of evidence, including portfolios, interviews or additional employer verification. Others questioned whether Personal Development Plans should be required across all routes. A small number raised concerns that the proposals could be perceived as lowering standards, while others emphasised their potential to widen access and improve diversity within the profession. Cost was also raised as a possible barrier for some applicants.
- 4.5. The overall picture is therefore one of broad support for the proposals, combined with a clear expectation that ARB should provide strong operational guidance and maintain visible assurance of competence.
- 4.6. The central issue for the Board is whether the proposed routes continue to provide adequate assurance of competence in line with its statutory duty, rather than the level of stakeholder support on any individual issue.
- 4.7. The consultation evidence indicates that the routes are understood to be proportionate and to remove unnecessary barriers without changing the underlying competence threshold. The proposals do not alter the standard required for registration. Instead, they provide alternative means for demonstrating that the standard has been met, consistent with the flexibility permitted under the Act.
- 4.8. The suggested expansion of evidence bases has been carefully considered. Introducing interviews or portfolio reviews would not necessarily improve public protection but would increase costs and subjectivity. Many suggested alternatives, such as employer verification, are already encompassed within the proposed requirement for professional references and experience. The conclusion is that the evidence model consulted on remains proportionate and appropriate.

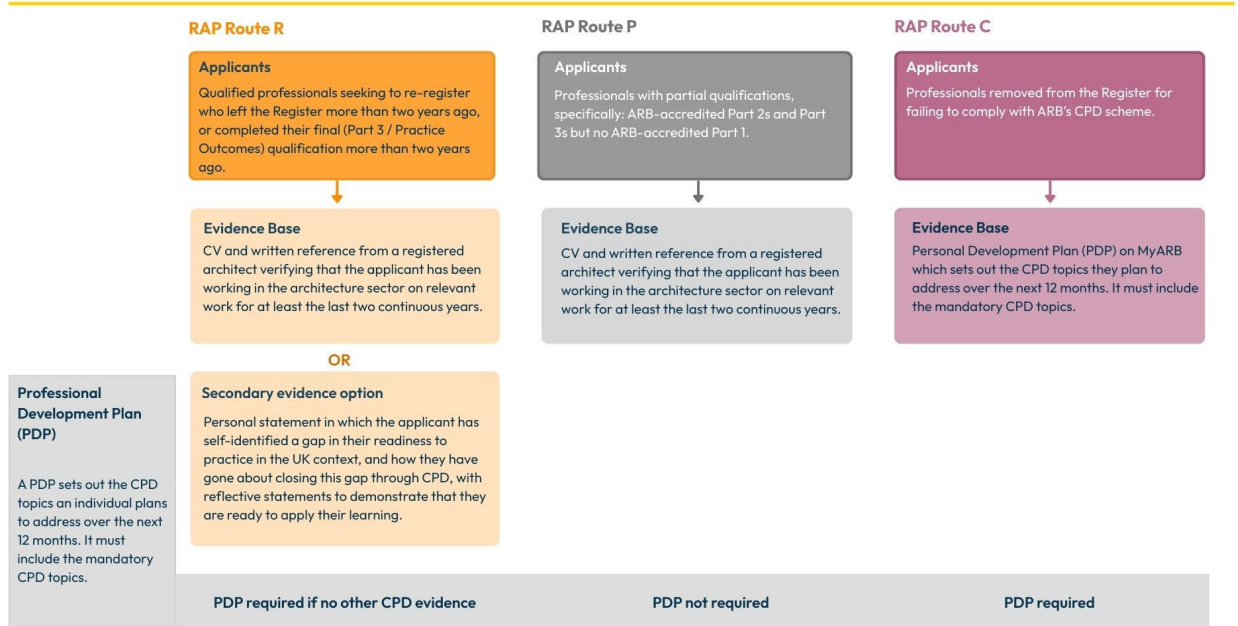
Personal Development Plans

- 4.9. The issue of Personal Development Plans requires particular consideration. Responses were mixed, and there was no clear consensus in favour of extending PDP requirements across all routes. In contrast, there was clear support for retaining them only where they address a specific regulatory risk.
- 4.10. We have considered this feedback alongside ARB's statutory duty to ensure continued competence. In the case of Route C, a Personal Development Plan directly addresses the circumstances that led to removal from the Register and will therefore be required in all cases.
- 4.11. For Route R, the regulatory risk varies depending on whether applicants can demonstrate recent engagement with professional practice and continuing professional development. A Personal Development Plan will therefore be used

selectively within the RAP where sufficient recent CPD evidence is not available, providing proportionate additional assurance where needed.

- 4.12. A Personal Development Plan is not considered necessary for Route P applicants, whose competence is evidenced through accredited higher-level qualifications and recent professional experience.

Registration Assurance Process: Evidence requirements



5. Regulatory impact

- 5.1. The proposals are expected to have differing impacts across applicant groups.
- 5.2. Route P will primarily benefit professionals who have completed accredited Part 2 and Part 3 qualifications but do not hold an accredited Part 1 qualification, including individuals with international undergraduate qualifications or alternative early academic pathways. For this group, the RAP removes an unintended structural barrier while maintaining assurance through professional experience requirements. We are aware of a significant number of people working who have worked within architecture (sometimes at very senior levels) for a number of years, but who have been ineligible to sit the prescribed examination at part 1, but we believe should be brought into regulation enabling them to demonstrate ongoing competence and compliance with the Code.
- 5.3. Route R will benefit architects seeking to return to the profession or who delayed initial registration after qualification. The RAP provides a clearer and more

proportionate mechanism for demonstrating continued competence while ensuring appropriate safeguards where individuals may have been absent from regulated practice.

- 5.4. Route C strengthens the existing framework for architects returning following removal for CPD non-compliance by introducing a structured mechanism to support re-engagement with professional learning.
- 5.5. While the RAP simplifies access for competent professionals, it also introduces targeted regulatory requirements where risk is higher. These requirements, including the potential use of Personal Development Plans where recent CPD evidence is unavailable, are intended to ensure that applicants returning to practice demonstrate active engagement with maintaining competence.

6. Risk Implications

- 6.1. The principal regulatory risk is that the new routes could be perceived as lowering standards. This will be mitigated through clear messaging that the competence threshold remains unchanged and through consistent application of the assurance process.
 - 6.2. There is also a risk of inconsistency in assessment as new arrangements are introduced. This will be addressed through a single assessor pool, standardised guidance and training. Consistency of decision making will be monitored following implementation.
 - 6.3. The targeted use of Personal Development Plans within Routes C, and where necessary within Route R, provides an additional safeguard by ensuring structured re-engagement with continuing competence where regulatory risk is greatest.
-

7. Communication and implementation

- 7.1. Subject to Board approval, implementation of the Registration Assurance Process will take place during 2026, with the new routes coming into force at the start of 2027.
- 7.2. The implementation period will be required to:
 - Develop applicant and assessor guidance
 - Design and embed standard operating procedures
 - Recruit (as necessary) and train Registration Assurance Assessors

- Update and test CRM systems to accommodate new application pathways
- 7.3. ARB will communicate proactively with individuals currently involved in the Part 1 Prescribed Examination process, as well as those who may wish to apply through one of the new routes. Communication will include publication of a detailed implementation timeline, eligibility guidance, and a comprehensive FAQ resource to support applicants in understanding how the new arrangements affect them and what actions, if any, they may need to take.

8. Equality and Diversity implications

- 8.1. The proposals are intended to improve access for competent professionals whose qualifications or career pathways do not align neatly with the traditional academic route of Parts 1, 2 & 3.
- 8.2. While some respondents raised concerns about cost, others saw the changes as supporting diversity and widening participation. ARB will monitor the impact of the new routes on the diversity of the Register once implemented.

9. Resource implications

- 9.1. The proposals do not introduce a new regulatory function but rationalise existing processes. Operational development will be required during 2026, including guidance, systems adjustments and communications. Fees associated with the new routes will be considered through the usual annual fee-setting process.
- 9.2. The proposals are deliverable within the 2026 budget.

10. Recommendations

The Board is asked to

Note the consultation report at **Annexe A**;

Approve the introduction of a new Registration Assurance Process comprising:

- **Route R** for qualified architects wanting to re-register after being off for more than two years, or who delayed registering for more than two years after qualifying

- **Route P** for partially qualified professionals with accredited Part 2 and 3 qualifications but no Part 1;
- **Route C** for architects removed from the Register for CPD non-compliance;

Approve the revised Registration Rules at **Annexe B** to implement these routes; and

Agree that the evidence requirements consulted on be adopted, including that a Personal Development Plan requirement for Route C.



New and improved routes to registration

Consultation analysis report

22 October 2025 – 2 February 2026

Contents

Executive summary	3
<hr/>	
Introduction	5
<hr/>	
Who responded	9
<hr/>	
Consultation responses	14
Proposed routes	14
Personal development plans	18
Registration Rules	20
Alternative evidence bases	20
Equality, diversity, and inclusion	21
Other topics raised	22
Conclusion and next steps	24
<hr/>	
Annex A: List of respondents	26
<hr/>	
Annex B: Consultation data	27
<hr/>	
Annex C: Qualitative analysis coding framework	32

Executive summary

ARB is the professional regulator responsible for setting the standards for registration as an architect. Registration exists to protect the public, so that anyone calling themselves an architect has the appropriate skills, knowledge, experience and behaviours. ARB must ensure that standards of competence are maintained however professionals join the UK Register.

One of ARB's strategic aims is to improve access to the Register for competent professionals by simplifying our processes and removing unintended complexity and barriers.

We proposed to introduce a new route to registration for:

- professionals with partial qualifications – specifically, accredited Part 2 and Part 3 qualifications but no accredited Part 1 (Route P).

In developing this new route, we also proposed to improve the efficiency and effectiveness of two other routes, for:

- qualified professionals who left the Register more than two years ago, or completed their final (Part 3 / Practice Outcomes) qualification more than two years ago (Route R), and
- professionals removed from the Register for failing to comply with ARB's CPD scheme (Route C).

These three routes will be covered by a new Registration Assurance Process that will introduce a simpler process for applicants based on a more targeted and proportionate evidence base.

The consultation ran from 22 October 2025 and closed on 2 February 2026. We received 85 unique responses.

Conclusions and next steps

The consultation demonstrated strong support for the proposals. Across all three routes, clear majorities of respondents agreed that the proposals would create a more proportionate process and increase access to the Register. Support was strongest for the proposals relating to re-entry and partial qualifications, with slightly lower but still substantial agreement in relation to CPD returners. A majority of respondents also thought the draft Registration Rules reflected the proposals accurately.

Following the high levels of support during our consultation, we plan to proceed with the proposals for all three of the new routes: Route R, Route P and Route C. As we do this, we will also consider updates to the Registration Rules using the specific feedback we received.

We are confident that through the positive feedback we received through this consultation, adding these additional routes will create a more proportionate process while also increasing access to the Register beyond the traditional route of entry.

Responses were mixed on whether to implement a mandatory personal development plan (PDP) for all the new routes. There was no clear consensus in favour of extending PDP requirements across all routes but there was clear support for using them where they address a specific regulatory risk. We have considered this feedback alongside ARB's statutory duty to ensure continued competence. In the case of Route C, a PDP directly addresses the circumstances that led to removal from the Register. It would provide an important safeguard by requiring these applicants to actively consider how they will maintain and develop their competence on return to practice.

We do not consider a PDP to be necessary for Route P applicants, whose competence is evidenced through accredited higher-level qualifications and recent professional experience.

In the case of Route R, applicants are returning to the Register after a significant period away from practice or following delayed registration. For these applicants, the regulatory risk varies depending on whether applicants can demonstrate recent engagement with professional practice and continuing professional development. A PDP could therefore be helpful if used selectively where sufficient recent CPD evidence is not available, providing proportionate additional assurance where needed.

We noted suggestions for where we could be clearer to potential applicants. When we share the next steps of this work, we will produce an updated timeline on when potential applicants can expect the changes to come into effect and develop clear guidance for applicants and stakeholders. Implementation will require development of standard operating procedures, assessor training and communication with prospective applicants.

Introduction

ARB's role

- 1.1** ARB is an independent professional regulator, established by Parliament as a statutory body, through the Architects Act, in 1997. We are accountable to government. The law gives us a number of core functions:
- To ensure only those who are suitably competent are allowed to practise as architects. We do this by accrediting the architecture qualifications required to join the Register of architects.
 - We maintain a publicly available Register of architects so anyone using the services of an architect can be confident that they are suitably qualified and are fit to practise.
 - We set the standards of conduct and practice the profession must meet and take action when any architect falls below the required standards of conduct or competence.
 - We set requirements for and monitor the continuous professional development that architects must undertake, to provide assurance to the public about the continuing competence of the profession.
 - We protect the legally restricted title 'architect'.

This consultation and our proposals

- 1.2** Architects play a vital role in shaping the places where we live and work. The public, our communities and clients expect that architects will deliver buildings and spaces that are safe and sustainable and carry out their work ethically and with integrity.
- 1.3** ARB has legal responsibility for determining the competence someone needs to become an architect and join our Register. The main way we achieve this is by setting the standards for qualifications and assessing and accrediting individual qualifications delivered by UK learning providers. ARB also has a duty to ensure that those who apply for registration without UK qualifications accredited by us have an equivalent standard of competence to those who enter the Register with accredited qualifications.
- 1.4** This piece of work was developed following our consultation early last year on international routes to registration and changes to the Prescribed Exam and the UK Adaption Assessment. During that consultation, we asked about remodeling the Competency Standards Group to allow assessment for those with partial

qualifications (e.g. a UK Part 2 and 3 but not a Part 1) to join the Register through an alternative route (Route P). This was part of our wider goal to make the Register more accessible. In this, 66% of respondents agreed with our proposal to allow those with mixed qualifications to be assessed via the CSG¹. As part of progressing with this proposal, we also identified two additional routes (Route R and Route C) to consider as options for entering the Register: those re-entering or delaying entry (Route R) and those who had been removed as part of ARB’s CPD scheme (Route C).

1.5 This consultation proposed to create these three routes to registration through the new Registration Assurance Process, with the accompanying evidence requirements:

<p>Route R: Re-Entry or delayed entry to the Register for qualified architects</p>	<ul style="list-style-type: none"> • A qualified professional must use this route to apply to the Register specifically if they left the Register more than two years ago, or completed their final (Part 3 / Practice Outcomes) qualification more than two years ago. • Evidence required would be a CV and written reference from a registered architect verifying that the applicant has been working in the architecture sector on relevant work for at least the last two continuous years. • OR, if unavailable, evidence can be a personal statement in which the applicant has self-identified a gap in their knowledge or readiness to practice in the UK context and how they have gone about closing this gap through CPD, with reflective statements to demonstrate that they are ready to apply their learning.
<p>Route P: Partially qualified applicants</p>	<ul style="list-style-type: none"> • A new route to registration for applicants who have partial qualifications, specifically, ARB-accredited Part 2s and Part 3s but no ARB-accredited Part 1. • Evidence required would be a CV and written reference from a registered architect verifying that the applicant has been working in the architecture sector on relevant work for at least the last two continuous years.
<p>Route C: Previously registered architects removed from the Register for CPD non-compliance</p>	<ul style="list-style-type: none"> • For previously registered architects who did not comply with ARB’s continuing professional development (CPD) scheme and were removed from the Register as part of the retention fee process and now wish to return to the Register. • Evidence required would be a Personal Development Plan (PDP) on MyARB which sets out the CPD topics they plan to address over the next 12 months. The PDP must include the mandatory CPD topics.

¹ <https://arb.org.uk/wp-content/uploads/Consultation-on-international-routes-Analysis-Report.pdf>

- 1.6** We also asked whether applicants should submit a PDP as a piece of evidence for each new route. In addition to this we also asked respondents what other alternative forms of evidence could be required, whether our proposals aligned with our drafting of updated Registration Rules, and whether there was anything they wanted to tell us about impacts on EDI.

How we analysed responses

- 1.7** In addition to some gateway questions to help us understand the types of stakeholders responding, the consultation was comprised of six questions. Three were ‘closed’ multiple choice questions that also had an optional ‘open’ free-text element where respondents could provide more insights into their views. Three further questions were optional free text written responses where respondents could provide more information if they chose to do so. The questions are reproduced in order below.

Question 13: To what extent do you agree that our proposals for each registration assurance route will:

- create a more proportionate process?
- increase access to the Register?

Multiple choice on each separate route area, with optional written response

Question 14: Are there any alternative evidence bases that ARB should consider that could provide the necessary reassurance whilst remaining proportionate for applicants?

Optional written response

Question 15: Do you think all those applying to join the Register under these routes should submit a Personal Development Plan?

Multiple choice, with optional written response

Question 16: To what extent do you agree that the draft changes to ARB’s Registration Rules accurately reflect the proposals set out in this consultation?

Multiple choice, with optional written response

Question 17: Is there any feedback you wish to give about a positive or negative impact on equality, diversity and inclusion within our proposals?

Optional written response

Question 18: Is there anything further you would like to tell us in relation to this consultation?

Optional written response

- 1.8** We asked respondents the extent to which they agree or disagree with each of the proposed routes through the Registration Assurance Process. Respondents were able to provide a different answer for each proposed route and expressed their opinion towards through a closed multiple-choice scale, by selecting Strongly agree, Agree, Neither agree nor disagree, Disagree, or Strongly disagree.

- 1.9** We have combined the roles of ‘registered architects’ and ‘academics (registered architects)’ together when calculating some percentages. Where appropriate, we have also conducted further analysis of those who said they were planning to use Route P in future, as this group would most likely be affected by our proposed changes and we wanted to identify their views as a group.
- 1.10** We used qualitative research methods to analyse the responses to the six questions that allowed respondents to provide free-text responses. This involved identifying, and then applying, a list of themes that we generated by reading responses and assessing recurring topics. When we say that a topic was raised a certain number of times, the numbers refer to the number of respondents who raised that topic, not how many times that respondent raised it.
- 1.11** A full breakdown of the consultation data can also be found in Annex B: Consultation data. Our coding framework is set out in Annex C: Qualitative analysis coding framework.

Who responded

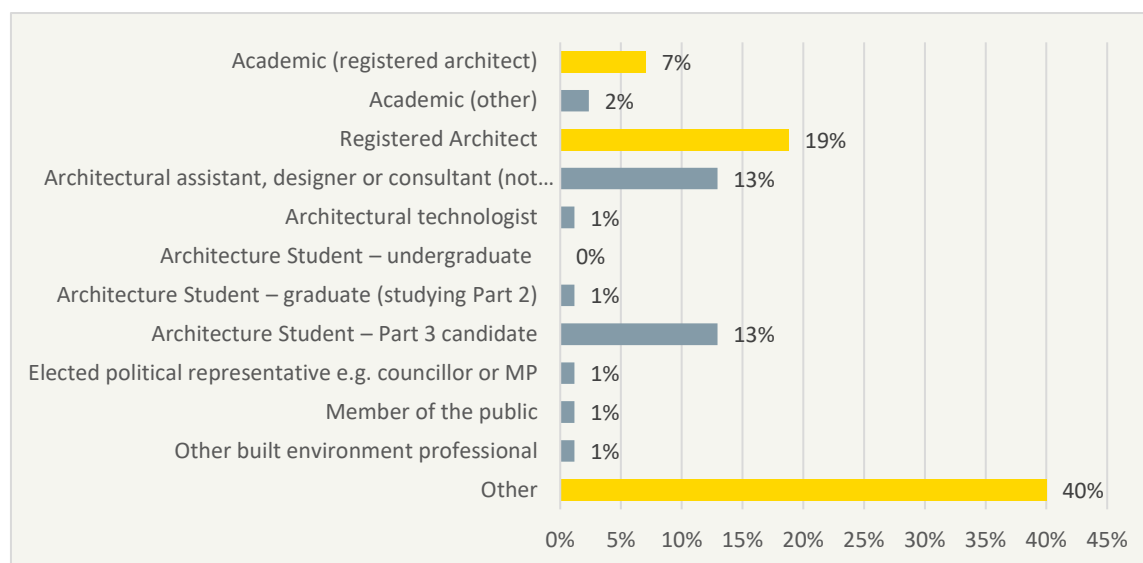
2.1 The consultation was open between 22 October 2025 to 2 February 2026. We received 85 unique responses to the consultation. Respondents were asked to identify themselves across categories, including demographic information and their role.

Role

2.2 The largest group of respondents stated that their role was ‘other’ (34, 40%). Respondents were able to provide further information about their role and this group included respondents who were architectural designers, architectural assistants, respondents who had their Part 2 and Part 3 but no Part 1 or were overseas registered architects. The second largest group was registered architects (22, 26%), including academics who were registered architects.

2.3 There were a further 11 respondents (13%) who were architectural assistants, designers or consultants (not Part 3 qualified), and another 11 respondents (13%) who were architecture students – Part 3 candidates. There were also seven (8%) other types of respondents, which included other academics (2, 2%), an architectural technologist² (1, 1%), architecture student – graduate (studying Part 2) (1, 1%), elected political representative e.g. councillor or MP (1, 1%), a member of the public (1, 1%), and other built environment professionals (1, 1%).

Figure 2.1: Respondents organised by role (% of responses)

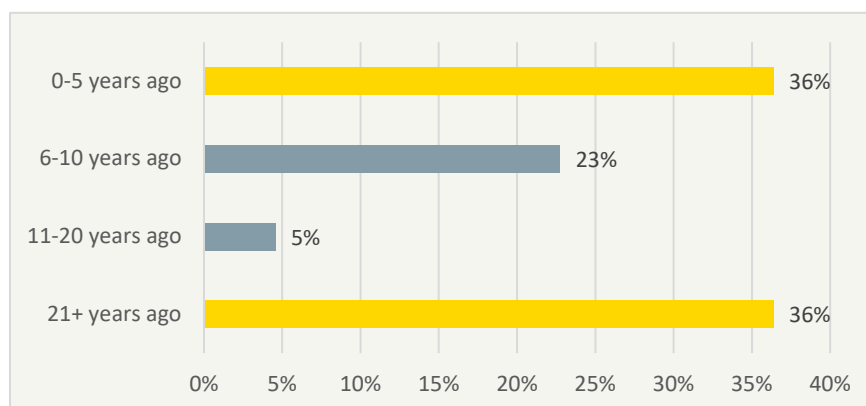


² After 11 responses to the consultation, we added ‘architectural technologist’ as an option for respondents’ role. At this point, no respondents had indicated they were an architectural technologist under the ‘other’ subcategory.

Registered architects

2.4 Registered architects (including the six who were academics) were asked how long they had been qualified and the size of their practice. Of the 22 registered architects who responded, similar numbers qualified 0-5 years ago (8, 36%), 6-10 years ago (5, 23%) or over 21 years ago (also 8, 36%). One registered architect (5%) had qualified between 6-10 years ago.

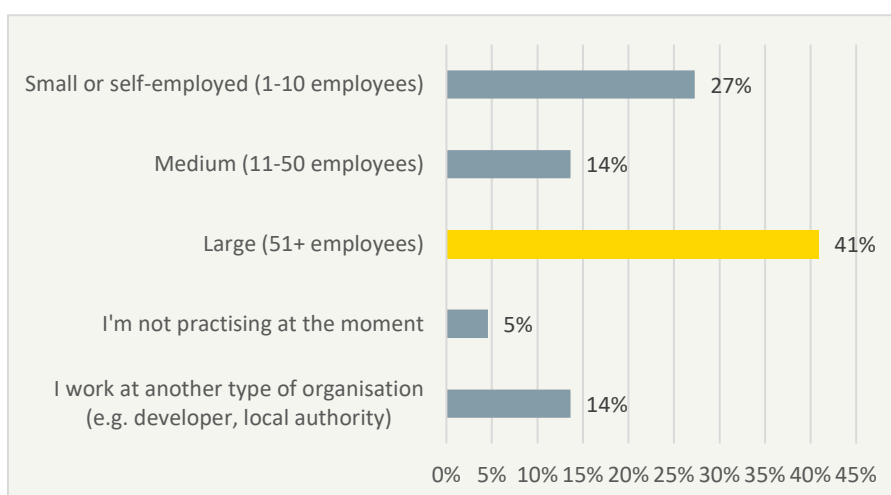
Figure 2.2: Registered architects organised by time since qualified (% of architect responses)



2.5 We also asked the registered architects about the size of their practice. The largest number of respondents worked at a large practice: nine respondents (41%) (51+ employees), while other registered architects worked at a range of practice sizes. Six of the 22 respondents (27%) worked at either a small or self-employed practice (1-10 employees).

2.6 Three of the 22 architect respondents (14%) worked at a medium practice (11-50 employees) and another three respondents (14%) worked at a different type of organisation. One respondent (5%) was not currently practicing.

Figure 2.3: Registered architects organised by type/size of practice (% of architect responses)



Organisations

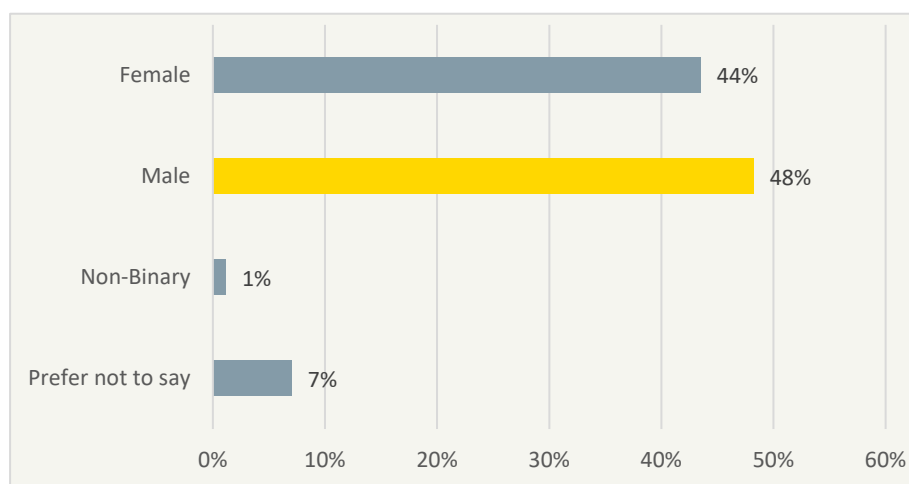
2.7 There were nine responses on behalf of organisations, which accounted for 11% of all responses to the consultation. Many of these were individual practices, but some were representative bodies. A full list of respondents who agreed to their response being published in full is included in Annex A.

Gender

2.8 Forty-one respondents (48%) identified as male, while 37 respondents identified as female (44%). One respondent identified as non-binary (1%) and six respondents (7%) preferred not to say.

2.9 The proportion of female respondents (48%) is higher than the proportion of female registered architects on the Register (37%). The proportion of male respondents (48%) is lower than the proportion of male registered architects on the Register (63%).³

Figure 2.4: Respondents organised by gender (% of responses)



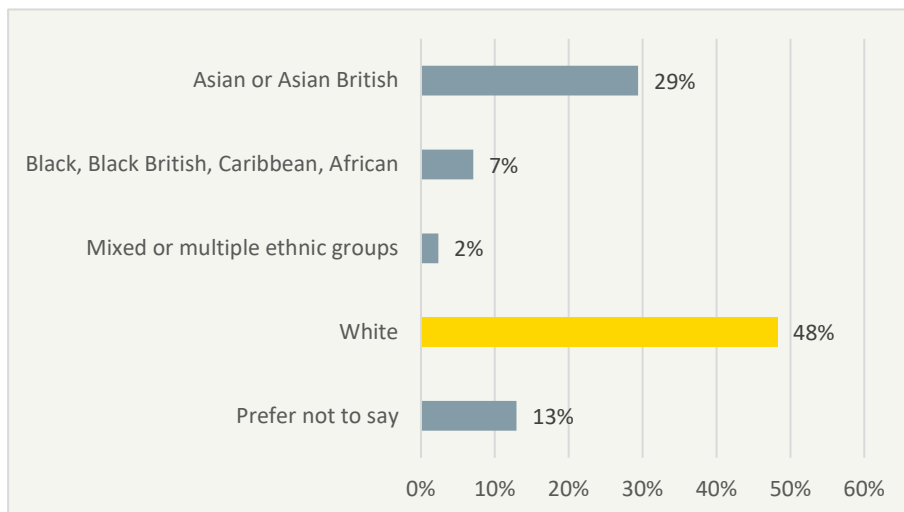
Ethnicity

2.10 Respondents were asked which ethnic group they belong to. Forty-one respondents (48%) were 'white'. We saw higher proportions of some ethnic groups in this consultation compared to Register data. Respondents who said they were 'white' were 48% of respondents despite making up 77% of the Register. There were 25 respondents (29%) who were 'Asian or Asian British,' and this was higher than the proportion on the Register (9%). We also saw higher representation from respondents who identified as 'Black, Black British, Caribbean, African' (6, 7%) compared to 2% on the Register.

³ Register data is as of February 2026. Further information is available on ARB's website at <https://arb.org.uk/about-arb/equality-diversity/data>.

2.11 Due to the limited number of respondents for this consultation, we cannot make further deductions based on ethnicity in our analysis.

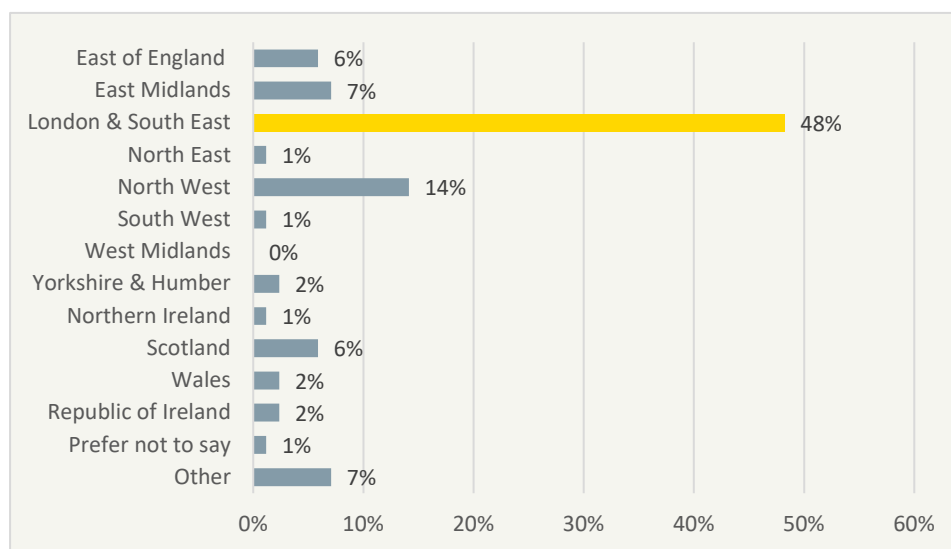
Figure 2.5: Respondents organised by ethnicity (% of responses)



Geographic spread of respondents

2.12 Respondents were asked to identify the nation or region that most closely described their place of residence. The highest group, with 41 respondents (48%), were those based in London and the South East. This was followed by 12 respondents (14%) stating they were based in the North West.

Figure 2.6: Respondents organised by place of residence (% of responses)



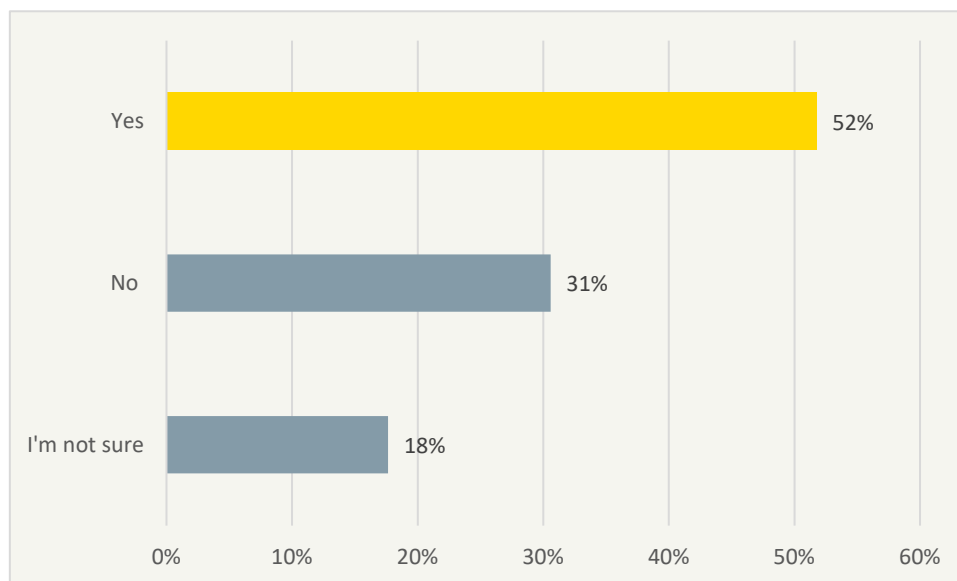
Health

2.13 We asked respondents whether they have any physical or mental health conditions or illness lasting or expected to last 12 months or more. Seventy-six respondents (89%) said they did not, three respondents (4%) said they did, and six respondents (7%) preferred not to say.

Future applicants

2.14 For this consultation we also asked respondents whether they were planning to apply through the proposed Route P, for partial qualifications, in the future. Forty-four respondents (52%) stated that 'yes', they planned to apply to the Register via Route P, while 26 respondents (31%) stated 'no' and 15 respondents (18%) stated 'I'm not sure.'

Figure 2.7: Are you planning to apply through the new partially qualified route (Route P) in future? (% of responses)



Consultation responses: Respondent views

Proposed routes

Registration Assurance Process: Evidence requirements

RAP Route R

Applicants

Qualified professionals seeking to re-register who left the Register more than two years ago, or completed their final (Part 3 / Practice Outcomes) qualification more than two years ago.



Evidence Base

CV and written reference from a registered architect verifying that the applicant has been working in the architecture sector on relevant work for at least the last two continuous years.



Secondary evidence option for Route R only

Personal statement in which the applicant has self-identified a gap in their readiness to practice in the UK context, and how they have gone about closing this gap through CPD, with reflective statements to demonstrate that they are ready to apply their learning.

RAP Route P

Applicants

Professionals with partial qualifications, specifically: ARB-accredited Part 2s and Part 3s but no ARB-accredited Part 1.



RAP Route C

Applicants

Professionals removed from the Register for failing to comply with ARB's CPD scheme.



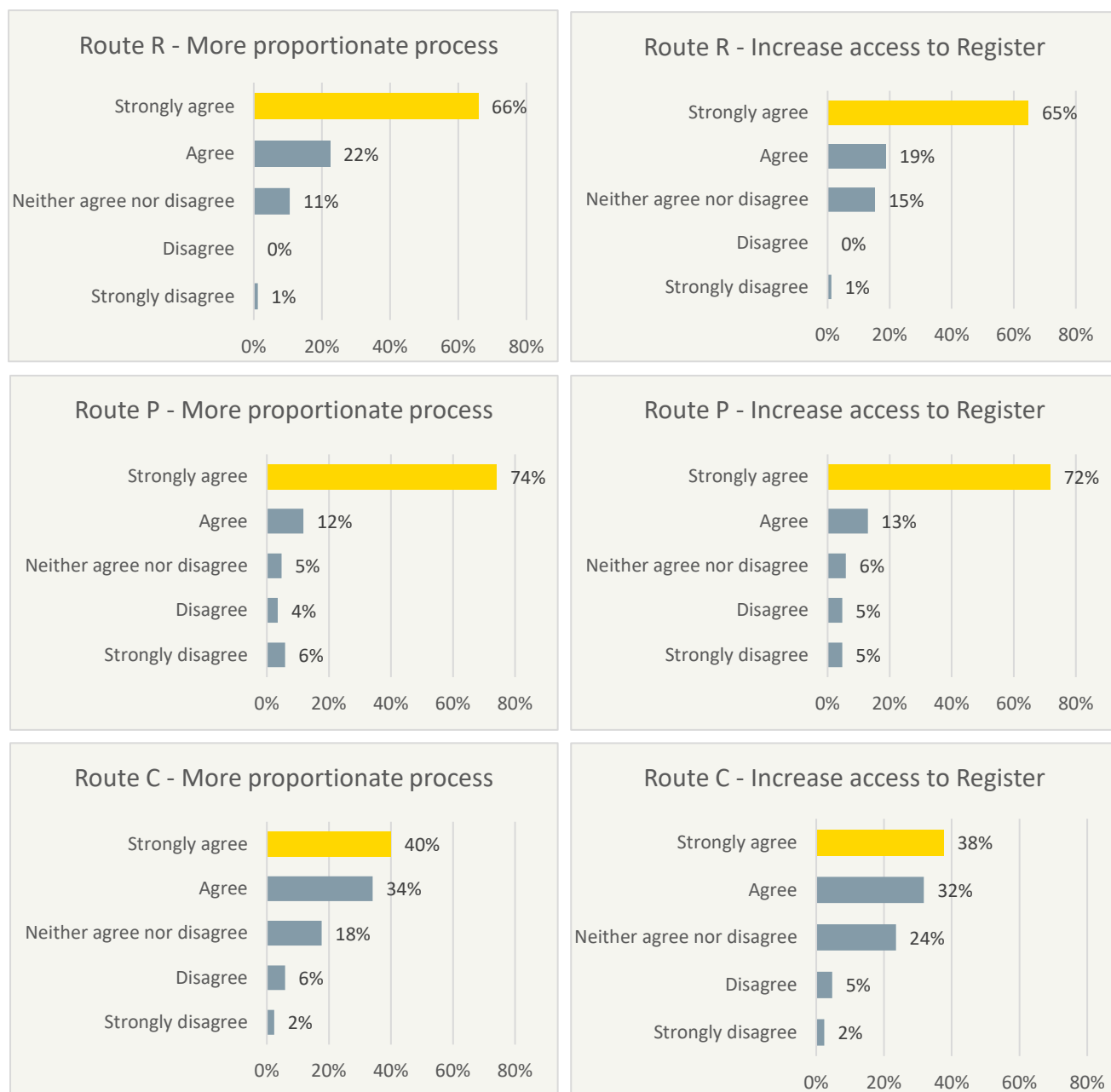
Evidence Base

Personal Development Plan (PDP) on MyARB which sets out the CPD topics they plan to address over the next 12 months.

It must include the mandatory CPD topics.

- 3.1** We asked whether each proposal would create a more proportionate process and increase access to the Register. **More respondents agreed than disagreed with each proposed change**, with between 70% and 88% of respondents either strongly agreeing or agreeing with each proposal (see Figure 3.1).

Figure 3.1: To what extent do you agree that our proposals for each registration assurance route will: 1) create a more proportionate process and 2) increase access to the Register? (% of responses)



Route R – More proportionate process

3.2 The proposal for whether Route R would create a more proportionate process received the highest level of agreement when compared to other proposed routes, with 75 of 85 respondents (88%) either agreeing (19, 22%) or strongly agreeing (56, 66%). One respondent (1%) strongly disagreed.

Route R – Increase access to the Register

- 3.3** The proposal for whether Route R would increase access to the Register received high levels of agreement, with 71 of 85 respondents (84%) either agreeing (16, 19%) or strongly agreeing (55, 65%). One respondent (1%) strongly disagreed.

Route P – More proportionate process

- 3.4** The proposal for whether Route P would create a more proportionate process received the second highest level of agreement, with 73 of 85 respondents (86%) either agreeing (10, 12%) or strongly agreeing (63, 74%). Eight respondents (10%) either disagreed (3, 4%) or strongly disagreed (5, 6%) with whether the proposed Route P would create a more proportionate process. Among those who said they were planning to apply through this route, 42 of these 44 respondents (95%) agreed or strongly agreed the proposal was more proportionate.

Route P – Increase access to the Register

- 3.5** The proposal for whether Route P would increase access to the Register received high levels of agreement, with 72 of 85 respondents (85%) either agreeing (11, 13%) or strongly agreeing (61, 72%). Eight respondents (10%) disagreed. Among those who said they were planning to apply through this route, 42 of the 44 respondents (95%) agreed or strongly agreed.

Route C – More proportionate process

- 3.6** Route C received lower support compared to the other two Registration Assurance Process routes yet still received high levels of agreement, with 63 of 85 respondents (74%) either agreeing (29, 34%) or strongly agreeing (34, 40%) that Route C would create a more proportionate process. Seven respondents (8%) disagreed.

Route C – Increase access to the Register

- 3.7** The proposal for whether Route C would increase access to the Register also received high levels of agreement, with 59 of 85 respondents (70%) either agreeing (27, 32%) or strongly agreeing (32, 38%) with the proposal. Six respondents (7%) disagreed.

Qualitative analysis of respondents' views

- 3.8** Sixty respondents (71%) provided additional qualitative comments about the three Registration Assurance Process routes. We have analysed these in more detail and considered the suggestions they shared.
- 3.9** Four respondents (5%) said eligibility was unclear for Route R, five respondents (6%) for Route P, and three respondents (4%) thought this for Route C. This included the evidence needed for applicants to use the specific routes. Their uncertainties included:

- General confusion on how the new routes would work and which route would be applicable to respondents' personal circumstances.
- Not knowing what work experience would be considered relevant, how part-time work would be considered (or minimum hours were needed), and whether work had to be an architecture practice or anywhere within the wider built environment.
- If a reference from an overseas, non-UK registered architect could be used.
- Whether an applicant needs a minimum period of time 'back in practice' before re-registration.
- Whether existing international memorandums of understanding (MoUs) and Mutual Recognition Agreements (MRAs) could affect eligibility for the proposed routes or be affected by them.

3.10 Three respondents (4%) raised queries about ARB's CPD scheme in relation to Route C. One respondent asked how the PDP would work alongside the CPD scheme and used their response to say ARB should align with the learning requirements of RIBA's CPD scheme. Another respondent disagreed with removal from the Register for CPD non-compliance, saying this risks the scheme becoming a box-ticking exercise rather than one focused on professional development. One respondent thought CPDs needed to be certified with a signature from a registered architect, saying this would protect the title and public.

3.11 Thirteen respondents (15%) thought that ARB should expand the eligibility for Route P in some way. This included applicants with different accredited UK Part 1, Part 2, or Part 3 qualifications along with international qualifications, but in a combination that was outside the current scope of the proposals. It also included a suggested option for those with multiple years of industry expertise but no formal qualifications.

3.12 Some respondents (4, 5%) raised specific concerns about the reference requirement for Routes R and P. These included how referencing would work for applicants who may struggle to get a reference or those who worked part-time.

3.13 Some other respondents (3, 4%) also raised queries with the personal statement requirement for Route R. Two respondents were confused whether a personal statement

"[...] Further clarity would be beneficial on how alternative evidence—such as professional experience, employer references, and completion of UK-accredited Part 2 and Part 3 qualifications—will be assessed in practice. Providing clearer guidance on assessment criteria and decision-making would help ensure consistency, transparency, and fairness in the application of the revised rules"

Other, North West

could be used *instead of* a CV and written reference, or if all three had to be provided. All three respondents wanted reassurance that the process was robust in how ARB would be reviewing personal statements, with one respondent suggesting that there should be two independent parties also reviewing them (not just ARB).

Personal development plan

3.14 Once registered, all architects must undertake continuing professional development (CPD) and comply with our CPD scheme. Currently in our proposal we only require applicants entering through Route C to also submit a personal development plan (PDP). We asked respondents whether **all applicants** entering through any route (including Routes R and P) should have to submit a PDP to enter or return to the Register.

3.15 This suggestion received a mixed response. Forty-one respondents (48%) stated ‘no’ while 23 respondents (27%) said ‘yes’. Another 21 respondents (25%) stated ‘I’m not sure’. The views some respondents shared in free text responses are analysed in more detail below. They help to illustrate why we received higher levels of disagreement but also further detail on the routes or circumstances in which respondents thought a PDP should be submitted.

Figure 3.2: Do you think all those applying to join the Register under these routes should submit a Personal Development Plan? (% of responses)

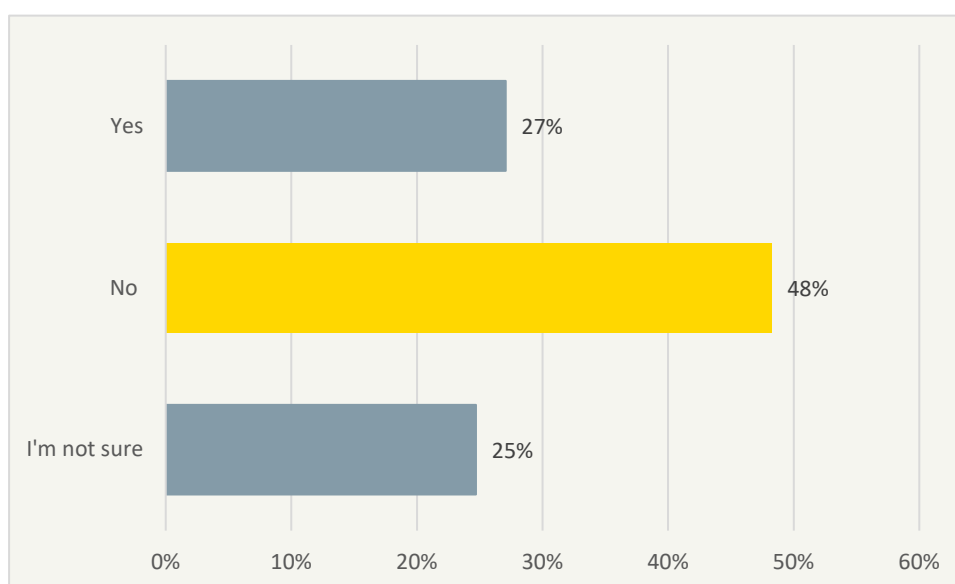
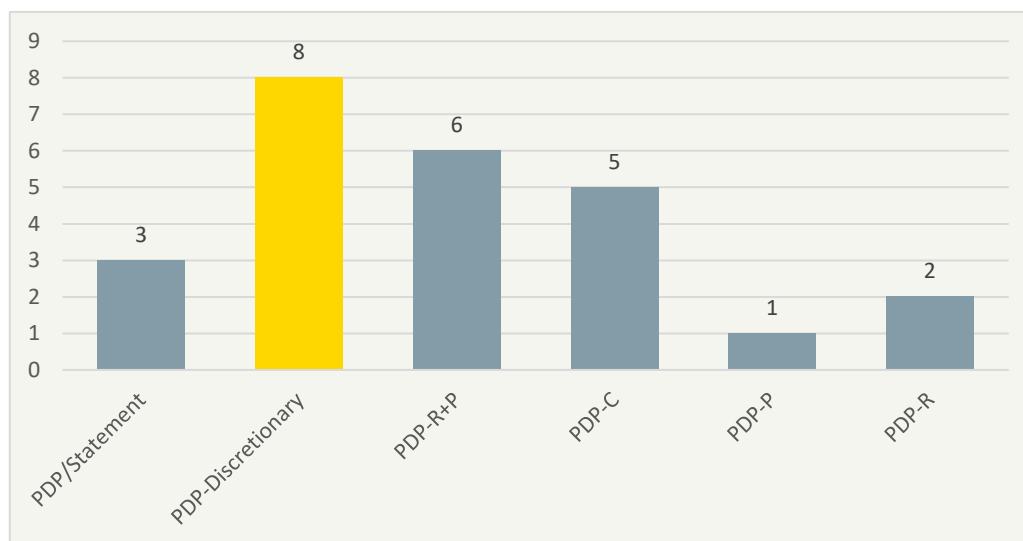


Figure 3.2: Themes raised on the Personal Development Plan (number of responses)



3.16 Forty-eight respondents (56%) provided additional qualitative comments about whether all those applying should submit a PDP. We have analysed these in more detail and considered the suggestions they shared.

3.17 Some of the respondents who agreed with making all routes require a PDP thought this created reassurance for the profession and others thought it meant applicants were committed to maintaining their professionalism. However, there was also a mix of views from respondents on which routes should or should not include a mandatory PDP.

3.18 Eight respondents (9%) thought that a PDP should only be required on a discretionary case-by-case basis. These applicants thought a PDP could be beneficial in some cases but did not think it should be mandatory for every applicant, sometimes mentioning the administrative burden of requiring that. Examples of scenarios they gave were:

- Applicants who had significant years of experience and could demonstrate their competencies in a different way.
- Underlining that PDPs would be useful for Route C as it could directly address the reason for the applicant's initial removal under the CPD scheme.

- When a Route R applicant's time away from the Register was significant and a PDP could then demonstrate they were addressing potential knowledge gaps.

“However, a PDP could be beneficial for applicants returning after a career break, re-registering after a long gap, or whose recent practice cannot be easily verified. In these cases, a PDP provides reassurance of ongoing competence while remaining proportionate. ARB could make the PDP requirement optional or targeted rather than mandatory for all applicants.”

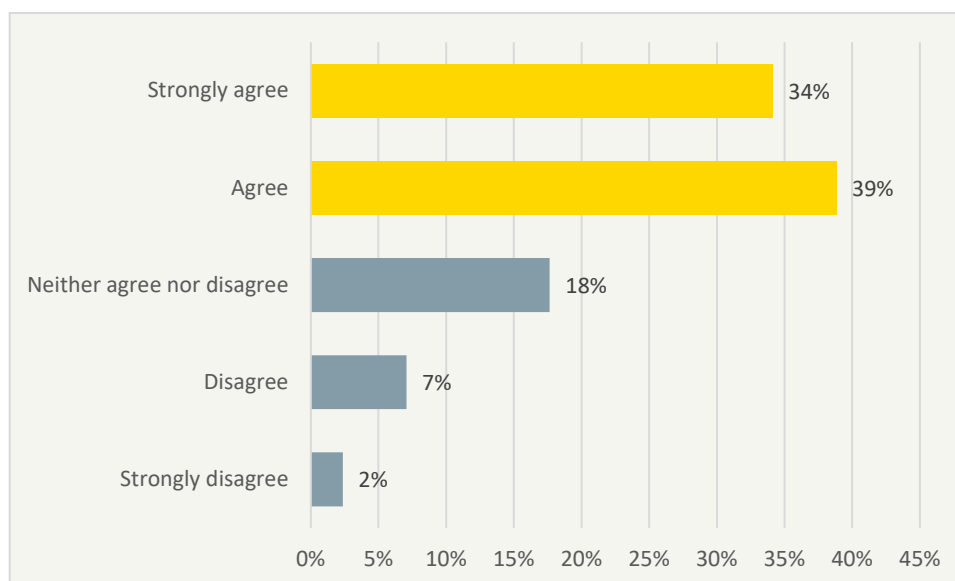
Other, London & South East

Registration rules

3.19 We asked respondents whether they thought the draft changes to ARB’s Registration Rules accurately reflected our proposals within this consultation.⁴ The majority of respondents (62, 73%) agreed (33, 39%) or strongly agreed (29, 34%). Fifteen respondents (18%) neither agreed nor disagreed, while eight respondents (9%) disagreed.

3.20 There were two respondents (2%) who gave suggestions for changes to the Registration Rules. One respondent suggested specific wording changes to reduce perceived ambiguity. The other respondent noted we had included Rule changes within two concurrent consultations and said we should ensure both versions of the Rules eventually aligned. We will consider these suggestions as part of our next steps and make sure the final version of the Registration Rules are clear and fit for purpose.

Figure 3.3: To what extent do you agree that the draft changes to ARB’s Registration Rules accurately reflect the proposals set out in this consultation? (% of responses)



Alternative evidence bases

3.21 Forty-eight respondents (56%) answered our question about whether there were any alternative evidence bases that we should consider that could provide the necessary reassurance whilst remaining proportionate for applicants.

3.22 These included specific examples of what alternative evidence bases could be useful and suggestions for alternative evidence bases. The two most mentioned examples

⁴ [ARB’s Registration Rules: Draft proposals for consultation, October 2025](#)

were considering an applicant’s relevant experience (mentioned 15 times) and an applicant’s portfolio of work (also mentioned 15 times). Respondents also suggested obtaining a reference from a colleague or client and that a letter of recommendation could be an alternative piece of evidence (mentioned 12 times).

- 3.23** We also received recurring suggestions to set evidence requirements case-by-case (2) and to use an applicant interview (3). Other suggestions included proving registration within the EU, experience in countries outside the UK, and using RIBA’s professional experience development record (PEDR).

“In addition to references from registered architects and CPD records, ARB could consider employment verification letters from firms confirming the applicant’s relevant projects, responsibilities, and duration of practice. Short, structured project summaries highlighting 2–3 key projects, the applicant’s role, and relevant competencies (including planning and Building Regulations knowledge) could also provide credible evidence of competence without the time and cost of a full portfolio.”

Other, Northern Ireland

Equality, diversity and inclusion

- 3.24** Forty respondents (47%) answered our question about whether our proposed changes would have a positive or negative impact on equality, diversity and inclusion (EDI). Most of these were general positive sentiments towards the proposals, in line with the quantitative responses on whether they would improve access.

- 3.25** Seven respondents (8%) raised concerns about potential barriers for equality, diversity and inclusion (EDI). Barriers they mentioned included cost, general barriers at entering the profession and accessibility of maintaining CPD. Some respondents also referred to the costs associated with the current Prescribed Exam and wanted to know more about the costs for using the new Registration Assurance Process.

“Without seeing further details, such as the guidance that will be made available to applicants, it is difficult to comment on whether there will be a positive or negative impact on equality, diversity and inclusion. There is no mention on the consultation of what the costs may be for applicants. This could be a barrier to diversity if the cost is prohibitive.”

RIBA

“I believe these proposals will have a positive impact on equality, diversity and inclusion within the profession. By introducing a more flexible and proportionate route to registration, ARB is recognising the diverse educational and professional journeys that can lead to competence in architecture.”

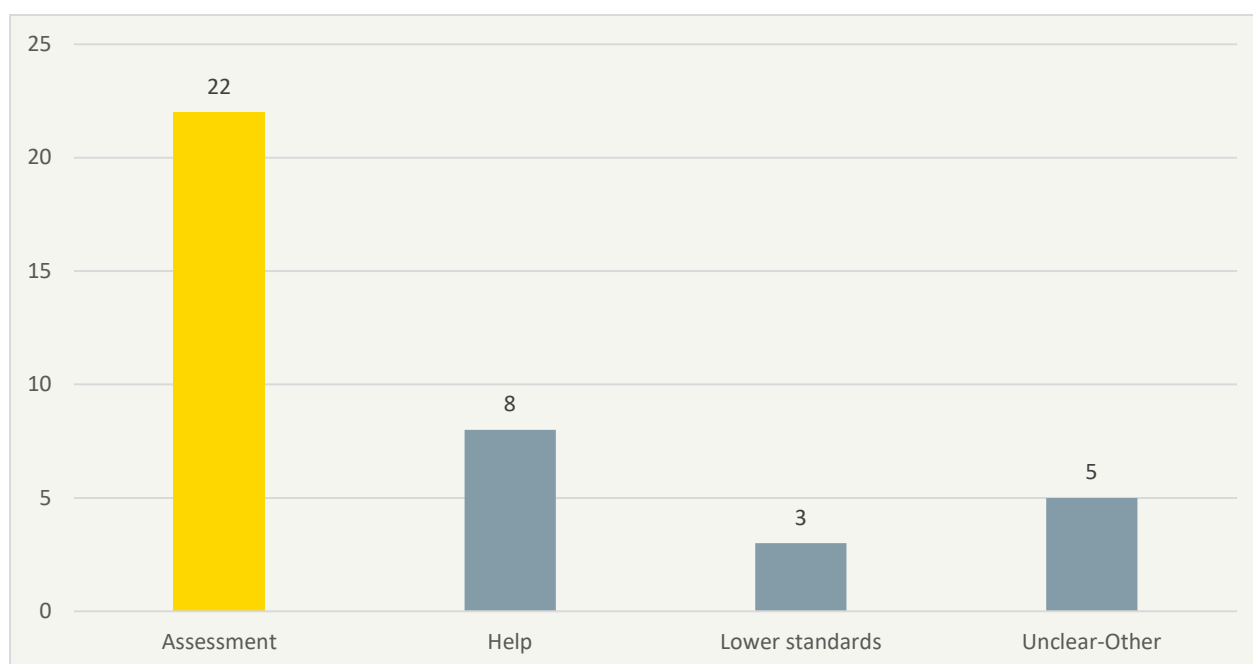
Academic (other), London & South East

Other topics raised

3.26 We identified and analysed four further recurring sentiments that respondents raised within their responses. These were:

- Views about improving the **assessment**, including:
 - Suggestions for improving the proposed assessment or its rigour.
 - Views on the format of the **assessment** including new forms of statement, second employers reference required, and concerns with implications of AI use.
- Suggestions for **other ways ARB could help** applicants through the process.
- Views that the changes proposed Registration Assurance Process will **lower the standards** of the profession.
- Other views that the proposals are **unclear** in some way that are not already captured elsewhere.

Figure 3.6: Common themes raised by respondents (number of respondents)



Assessment

3.27 Over a quarter of responders (22, 26%) expressed views about the assessment process, including about specific assessment methods, who would be conducting the assessment and how ARB could review available evidence.

3.28 We received one response about applicants using AI and that ARB should have measures put in place to avoid abuse. The respondent added that requiring references could help mitigate this.

“ARB could consider evidence such as a professional portfolio, employer references, or records of continuing professional development (CPD) as supplementary reassurance of competence. These forms of evidence would demonstrate ongoing engagement with the profession, reflective practice, and up-to-date knowledge of UK standards and ethics. Importantly, they would remain proportionate and practical, avoiding the need for applicants to reproduce historic academic material that may no longer reflect their current professional capability.”

Other, Hong Kong

“ARB should ensure that any submissions can be verified to be genuinely legitimate and to be the work of the applicant. There is also potential concern over use of AI. RIBA suggests there may need to be some element of personal interaction to mitigate this possibility. ARB could also consider requiring references from employers, otherwise this could be open to potential abuse.”

RIBA

Help

3.29 Eight respondents (9%) suggested other ways in which the ARB could help future applicants. These included suggestions to have a clear timeline and next steps that were easy to follow, offering additional support for applicants who were previously unsuccessful at joining the Register, having templates applicants could use for PDPs, additional support for neurodivergent applicants, and clearer advice on plans for implementation of the routes. We will consider these suggestions as part of our next steps and considering ways in which we can improve our communications of the new routes and their eligibility requirements.

“It would be grateful if the guidelines of the submission requirement or information on the website could be standardised, transparent and with a clearer timetable. I found that some guidelines and supportive information have been revised due to the reforming period of which was challenging to follow and keep track of.”

Registered architect, London & South East

Lower standards

3.30 There were three respondents (4%) who were concerned the new routes could lower standards. Their views were general sentiments about the standards of architect profession and that some people may not have the right qualifications to call themselves an architect.

Unclear - other

- 3.31** Five respondents (6%) thought that parts of the proposals were unclear in other areas that we have not already analysed above. These comments included specific areas of the new Registration Assurance Process and how they would work in practice. Some respondents asked how the proposals would affect transitional applicants and those who had already begun their prescribed exams but had not yet completed them.

Conclusions and next steps

- 4.1** Following the consultation and strong levels of support, we will progress with the proposals for the three additional routes of Route R, Route P, and Route C. We will also proceed with the updated Registration Rules that implement these proposals but will review the wording in light of feedback, in case any changes need to be made.
- 4.2** We believe our changes will create a more proportionate process to join the Register while also increasing access to the Register. We asked whether respondents were planning to use Route P and carried out further analysis on their views. Forty-two of these 44 respondents (95%) who said that they were planning to apply through Route P thought that the new route will create a more proportionate process and increase access to the Register. This gives us confidence that those who will use the new route will benefit from it.
- 4.3** Our consultation has given us feedback from respondents that we have managed to balance removing unnecessary barriers without changing the underlying competence threshold. The proposals do not alter the standard required for registration. Instead, they provide alternative means for demonstrating that the standard has been met, consistent with the flexibility permitted under the Act.

Eligibility

- 4.4** We do not plan to change the eligibility criteria for any of the routes, including for Route P where some respondents asked us to expand this. Our view is that the existing proposals are the correct balance between creating a more proportionate route to the Register while still upholding the standards expected. The proposals do not lower those standards and we do not agree with respondents who raised this concern. Instead, they aim to change the way in which the same high standard is demonstrated to make it more accessible.
- 4.5** Respondents wanted the new processes to be easy for future applicants to understand. We have noted suggestions for where we can be clearer on eligibility for each of the new routes and, as part of implementing the changes, we will be clear to applicants about who is eligible. We will use feedback from this consultation to help

us do this. For example, we will be clear where secondary evidence for Route R can be used instead of the CV and written reference. We can also be clear about who can provide a reference (such as a registered architect) and that someone working part-time should still be able to produce a reference as part of their application.

- 4.6** We noted suggestions for where ARB could help applicants. Respondents asked for a clear timeline on implementation and we will publish this. Others asked for reasonable adjustments and we would make these as we do with any of our existing routes. These are accommodations made to our practices, procedures, and services to ensure individuals with disabilities can participate fully and access our services. In combination with our development of the CPD scheme, we will consider whether to develop template PDPs.

Evidence bases

- 4.7** We considered the mixed views on the PDP alongside ARB's statutory duty to ensure continued competence. In the case of Route C, a PDP directly addresses the circumstances that led to removal from the Register. It would provide an important safeguard by requiring these applicants to actively consider how they will maintain and develop their competence on return to practice.
- 4.8** We do not consider a PDP to be necessary for Route P applicants, whose competence is evidenced through accredited higher-level qualifications and recent professional experience. In the case of Route R, applicants are returning to the Register after a significant period away from practice or following delayed registration. For these applicants, the regulatory risk varies depending on whether applicants can demonstrate recent engagement with professional practice and continuing professional development. A PDP could therefore be helpful if used selectively where sufficient recent CPD evidence is not available, providing proportionate additional assurance where needed.
- 4.9** We acknowledge the concerns some respondents had about the burden on them to provide evidence. We want the process to be proportionate. However, it is our statutory duty to make sure the public can be assured that all architects on the Register are competent.
- 4.10** We received several suggestions for alternative new evidence options for applicants. Respondents often did not specify which route they were referring to but we have considered the suggestions across the different proposed routes. Many of the suggestions are things we already proposed to include. For example, an applicant's relevant experience was suggested but this is already included as part of their CV. Similarly, a written reference was a common suggestion but this is required for

Routes R and P. We do not believe that either of these alone are sufficient evidence, nor that they are appropriate evidence for Route C. Other suggestions, such as applicant interviews, would not be proportionate. Our conclusion is that the evidence model consulted on remains proportionate and appropriate and therefore we do not plan to expand the types of evidence we accept.

Equality, diversity and inclusion

- 4.11** Some respondents thought that our proposed changes would give improvements for EDI in the sector. This is just one proposal that ARB has aimed to implement in recent years to try and improve access to the Register and we hope that diversity of the Register improves in the years to come.
- 4.12** Some respondents were concerned about the potential costs for these new routes and thought it could have a negative impact on efforts to improve EDI in the sector. We want to reduce the potential for cost to act as a barrier for applicants entering the Register through these routes. Any fees we set will be proportionate to the cost of the new routes and we will monitor this as it is implemented.

Annex A: List of respondents

There were 27 respondents who gave permission for their responses to be published in full, with a further 41 asking for their responses to be published anonymously.

There were nine responses made on behalf of organisations, with five agreeing to be published in full and four anonymously.

The individuals and organisations who gave permission for their response to be published in full are listed below.

- Adam Smith
- Agostina
- Alex Alex
- Aroma Kabra
- Belle, Po Yi Chan
- Chaitanya Chavan
- Craig McCracken
- Daniele
- Feberto Technique
- Guy Shackle
- Harry Wright
- Julia Skeete
- Kam Ping Wan
- Kinga krassoy
- Like Architects
- Luka Kai Yen Chang
- Marc Woods
- Maria Eapen
- Masara Akkad
- Nikhil Berwal
- Richard Ruddick Architecture
- Royal Institute of British Architects (RIBA)
- Royal Society of Architects in Wales (RSAW)
- Shahid Mulla
- Tahar Kouider
- Xii
- Yui Kwan Tam

Annex B: Consultation data

The full consultation data is below. Some questions were optional, and we have included the numbers of respondents who chose not to answer each question. In the main report, respondents who did not answer were not included for the analysis for each section.

Option	Total	Percent
Academic (registered architect)	6	7.1%
Academic (other)	2	2.4%
Registered Architect	16	18.8%
Architectural assistant, designer or consultant (not Part 3 qualified)	11	12.9%
Architectural technologist	1	1.2%
Architecture Student – undergraduate (studying Part 1)	0	0.0%
Architecture Student – graduate (studying Part 2)	1	1.2%
Architecture Student – Part 3 candidate	11	12.9%
Elected political representative e.g. councillor or MP	1	1.2%
Member of the public	1	1.2%
Other built environment professional	1	1.2%
Other	34	40.0%
Not Answered	0	0.0%

Option	Total	Percent
Female	37	43.5%
Male	41	48.2%
Non-Binary	1	1.2%
Prefer not to say	6	7.1%
Other	0	0.0%
Not Answered	0	0.0%

Option	Total	Percent
Asian or Asian British	25	29.4%
Black, Black British, Caribbean, African	6	7.1%
Mixed or multiple ethnic groups	2	2.4%
White	41	48.2%

Other ethnic group	0	0.0%
Prefer not to say	11	12.9%
Not Answered	0	0.0%

Table B4: Geographic spread of respondents		
Option	Total	Percent
East of England	5	5.9%
East Midlands	6	7.1%
London & South East	41	48.2%
North East	1	1.2%
North West	12	14.1%
South West	1	1.2%
West Midlands	0	0.0%
Yorkshire & Humber	2	2.4%
Northern Ireland	1	1.2%
Scotland	5	5.9%
Wales	2	2.4%
Republic of Ireland	2	2.4%
Prefer not to say	1	1.2%
Other	6	7.1%
Not Answered	0	0.0%

Table B5: Health		
Option	Total	Percent
Yes	3	3.5%
No	76	89.4%
Prefer not to say	6	7.1%
Not Answered	0	0.0%

Table B6: Registered architects (including academics) - when qualified		
Option	Total	Percent
0-5 years ago	8	9.4%
6-10 years ago	5	5.9%
11-20 years ago	1	1.2%
21+ years ago	8	9.4%
Not Answered	63	74.1%

Table B7: Registered architects (including academics) - size of practice		
Option	Total	Percent
Small or self-employed (1-10 employees)	6	7.1%
Medium (11-50 employees)	3	3.5%

Large (51+ employees)	9	10.6%
I'm not practising at the moment	1	1.2%
I work at another type of organisation (e.g. developer, local authority)	3	3.5%
Not Answered	63	74.1%

Table B8: To what extent do you agree that our proposals for each registration assurance route will create a more proportionate process? – Route R		
Option	Total	Percent
5: Strongly agree	56	65.9%
4: Agree	19	22.4%
3: Neither agree nor disagree	9	10.6%
2: Disagree	0	0.0%
1: Strongly disagree	1	1.2%
Not Answered	0	0.0%

Table B9: To what extent do you agree that our proposals for each registration assurance route will increase access to the Register? – Route R		
Option	Total	Percent
5: Strongly agree	55	64.7%
4: Agree	16	18.8%
3: Neither agree nor disagree	13	15.3%
2: Disagree	0	0.0%
1: Strongly disagree	1	1.2%
Not Answered	0	0.0%

Table B10: To what extent do you agree that our proposals for each registration assurance route will create a more proportionate process? – Route P		
Option	Total	Percent
5: Strongly agree	63	74.1%
4: Agree	10	11.8%
3: Neither agree nor disagree	4	4.7%
2: Disagree	3	3.5%
1: Strongly disagree	5	5.9%
Not Answered	0	0.0%

Table B11: To what extent do you agree that our proposals for each registration assurance route will increase access to the Register? – Route P		
Option	Total	Percent
5: Strongly agree	61	71.8%

4: Agree	11	12.9%
3: Neither agree nor disagree	5	5.9%
2: Disagree	4	4.7%
1: Strongly disagree	4	4.7%
Not Answered	0	0.0%

Table B12: To what extent do you agree that our proposals for each registration assurance route will create a more proportionate process? – Route C		
Option	Total	Percent
5: Strongly agree	34	40.0%
4: Agree	29	34.1%
3: Neither agree nor disagree	15	17.7%
2: Disagree	5	5.9%
1: Strongly disagree	2	2.4%
Not Answered	0	0.0%

Table B13: To what extent do you agree that our proposals for each registration assurance route will increase access to the Register? – Route C		
Option	Total	Percent
5: Strongly agree	32	37.7%
4: Agree	27	31.8%
3: Neither agree nor disagree	20	23.5%
2: Disagree	4	4.7%
1: Strongly disagree	2	2.4%
Not Answered	0	0.0%

Table B14: Do you think all those applying to join the Register under these routes should submit a Personal Development Plan?		
Option	Total	Percent
5: Yes	23	27.1%
4: No	41	48.2%
3: I'm not sure	21	24.7%
Not Answered	0	0.0%

Table B15: To what extent do you agree that the draft changes to ARB's Registration Rules accurately reflect the proposals set out in this consultation?		
Option	Total	Percent
5: Strongly agree	29	34.1%
4: Agree	33	38.8%
3: Neither agree nor disagree	15	17.7%

2: Disagree	6	7.1%
1: Strongly disagree	2	2.4%
Not Answered	0	0.0%

Table B16: Are you planning to apply through the new partially qualified route (Route P) in future?

Option	Total	Percent
Yes	44	51.8%
No	26	30.6%
I'm not sure	15	17.7%
Not Answered	0	0.0%

Annex C: Qualitative analysis coding framework

Theme	Description
Route R – Eligibility	The respondent thought eligibility requirements for Route R were unclear in some way
Route R – Returners	Views where the respondent thought the proposal for Route R for be positive and encourage people to return the Register.
Route R – Statement	The respondent raised specific issues with the requirement for a statement.
Route P – Eligibility	The respondent thought eligibility requirement for Route P were unclear in some way.
Route P – Expand	The respondent proposed expanding eligibility for Route P in some way.
Route R or Route P – reference	The respondent raised specific problems with the reference requirement for Route R or Route P.
Route C – Eligibility	The respondent thought eligibility requirement for Route C were unclear in some way.
Route C – CPD	Suggestions that CPD compliance needs should be checked in some way for people who use this route.
PDP – Route R and Route P	Views that a PDP should be required for both Route R and Route P (in addition to Route C).
PDP – Route R	Views that a PDP should also be required for only Route R (in addition to Route C).
PDP – Route P	Views that a PDP should also be required for only Route P (in addition to Route C).
PDP – Route C	The respondent emphasised that a PDP should only be required for Route C.
PDP – Discretionary	Views that a PDP should only be used in discretionarily or in certain circumstances.
PDP OR Statement	Views that a PDP OR a statement is enough, rather than both
Lowers standards	Opinions that the proposals will lower the overall standards of the architecture profession.
Unclear – Other	Views that part of the proposals are unclear in some way and which isn't already covered elsewhere in our analysis.
Assessment	Suggestions for specific ways to improve the assessment process or its rigour. This can include its format or how evidence is assessed.
Rules issue	Suggestions for specific wording changes to the draft Registrations Rules.
New help	Suggestions for new ways in which ARB can help applicants.

If you need information on this document in a different format such as an audio recording or braille, you can:

- email info@arb.org.uk
- call 020 7580 5861
- write to us at ARB, 70 Gray's Inn road, London, WC1X 8NH

We will consider your request and get back to you within 14 days.



ARB's Registration Rules

Architects Registration Board

ARB's Registration Rules

1. Commencement

1.1 These rules shall be known as the 'Architects Registration Board Registration Rules' and are made under section 3(2A), (3), section 4(1)(a), (1A), (2), section 6(1), (2), (3), section 6A, section 8(1), (2), (3), section 9(1), (3), section 18(2)(b), (3), (4), section 20(4) and section 23(1) of the Act.

1.2 These rules shall take effect on [to be completed].

2. Interpretation

2.1 In these rules, the expression:

'the Act' shall mean the Architects Act 1997 (as amended);

'the ARB' shall mean the Architects Registration Board;

'the Board' shall mean the board of the ARB, as referred to in Part I of Schedule 1 of the Act;

'the ARB's portal' shall mean the online platform approved by the Board for the purpose of managing registration;

'disclosable criminal conviction or caution' shall mean a caution or conviction other than one which a person is entitled by law not to disclose;

'Registrant' shall mean a person registered in the Register;

'Registration Assurance Process' shall mean a process prescribed by the Registrar for the purpose of determining whether a person is competent to practise as an architect in the United Kingdom

'retention fee' shall mean the fee required by the ARB each calendar year under section 8(1) of the Act for the purposes of a Registrant retaining their name in the Register.

2.2 The Interpretation Act 1978 shall apply for the purpose of interpretation of these rules as it applies for the purpose of interpretation to an Act of Parliament.

3. Applications for Registration or Re-entry

3.1 An applicant for registration or re-entry to the Register shall via the ARB's portal:

(a) complete the ARB's relevant form of application;

(b) any declaration required by the ARB;

(b) supply the evidence required by the ARB as appropriate to the section of the Act upon which the application is based;

(c) provide contact details in the form of their home address and an email address at which they can be contacted for the purposes of registration; and

(d) make payment of any prescribed fee.

4. Registration Assurance Process

4.1 The Registrar may require any person applying for registration or re-registration to undertake a Registration Assurance Process.

4.2 The Registrar shall determine the form, content, evidence and assessment criteria of a Registration Assurance Process.

4.3 The Registrar may appoint assessors for the purpose of carrying out Registration Assurance Process.

5. Qualifications and practical experience

5.1 The qualifications and practical experience prescribed by the ARB pursuant to section 4(1)(a) of the Act are that the person:

(a) holds qualifications listed in Schedule 1 of these rules at the date conferred on the applicant at:

(i) Part 1, Part 2 and Part 3;

(ii) masters and postgraduate diploma level; or

(iii) Part 2 and Part 3 and has provided such other evidence of training and experience as the Registrar may require under these Rules, being successful completion of a Registration Assurance Process; and

(b) has recently completed a minimum of 24 months' practical experience under the direct supervision of a professional working in the construction industry which should include at least 12 months working in a Relevant European Territory, under the direct supervision of an architect.

5.2 Schedule 1 is published on the ARB's website.

5.3 For the purpose of this rule:

'months' shall mean calendar months of full time working, comprised of at least 20 hours a week. Reasonable time off for holidays and illness may be included in this period. Where the work is less than 20 hours per week, applicants will be expected to complete a commensurately longer period of experience;

'practical experience' shall mean experience which consists of activities which would typically be undertaken by an architect in practice;

'recently' shall mean at least 12 of the 24 months' experience should have been undertaken in the two years immediately before taking the Part 3 exam;

'direct supervision' shall mean the person supervising should have responsibility for and control over the work being undertaken;

'professional working in the construction industry' shall mean an architect registered in the territory where the experience is being undertaken, or a chartered or similarly qualified member of an appropriate professional body. The 'construction industry' will include qualified professionals;

'Relevant European Territory' shall mean the British Islands (the United Kingdom, the Channel Islands and the Isle of Man), States in the European Economic Area (EEA) and Switzerland;

'typically' shall mean involved in the procurement, design and management of the built environment.

6. Prescribed Examinations

6.1 The examination in architecture prescribed by the ARB pursuant to section 4(2) of the Act, for determining competence pursuant to section 4(1)(b) of the Act, shall be one or more of the following:

- (a) an examination conducted by the ARB or a Committee established by the Board;
- (b) an examination in any subject area nominated by the ARB at final level conducted by a learning provider which awards a prescribed qualification;
- (c) any other examination which the ARB may approve for this purpose; or

DRAFT

(d) any oral or written examination carried out under such procedures as the ARB may establish.

6.2 For the purpose of this rule, a 'learning provider' shall mean a qualifications provider listed in Schedule 1.

7. Recent practical experience and training – entry to the register

7.1 Any person who falls within the categories described in:

- (a) section 9(1)(a) of the Act;
- (b) section 9(1)(a) who is seeking entry to the Register more than two years after the date of the award of their final prescribed qualification required for registration;
- (c) section 9(1)(b) of the Act, who is seeking re-entry under section 8 after being not entered in the Register for more than two years; or
- (d) section 9(1)(c) of the Act,

must have gained such recent practical experience or undertaken such recent training as prescribed by the ARB in this rule.

7.2 For the purposes of this rule:

7.2.1 an applicant falling within 7.1(b) or 7.1(c) must satisfy the Registrar, by means of a Registration Assurance Process, that they have undertaken such recent practical experience and training as are sufficient to maintain their competence to practise; and

7.2.2 the Registrar may require any other applicant under this rule to provide such evidence by means of a Registration Assurance Process where necessary to establish that requirement.

8. Continuing professional development – retention on the register

8.1 For the purpose of a person falling within section 9(1)(b) of the Act who wishes their name to be retained in the Register, the prescribed recent practical experience and recent training shall be that contained in the Scheme for Continuing Professional Development published on the ARB's website.

8.2 In the case of a person falling with section 9(1)(b) of the Act who wishes their name to be retained in the Register:

- (a) a Registrant shall record their continuing professional development activities in compliance with the Scheme for Continuing Professional Development on the ARB's portal or another recording system recognised by the Board;
- (b) when required by the ARB, a Registrant shall declare whether they are:
 - (i) compliant with the scheme; or
 - (ii) seeking to defer submission;
- (c) the ARB may review a Registrant's CPD record annually.

8.3 Upon review of a Registrant's CPD record, the ARB may assess them as being:

- (a) compliant with the scheme;
- (b) requiring some further work to become compliant; or
- (c) not compliant.

8.4 In the case of a person assessed as being not compliant with the scheme under rule 7.3(c), the ARB shall within 28 days serve written notice under section 9(1)(b) of the decision not to retain them in, or remove them from, the Register.

DRAFT

8.5 Where a written notice is served informing a Registrant under section 9(1)(b) of a decision not to retain them in, or remove them from, the Register that notice shall inform the person of their right to appeal the decision to the Appeals Committee within 28 days of date of the notice.

8.6 Where a Registrant does not make their record available under rule 7.2(c), the ARB may determine it cannot be satisfied they have gained the recent practical experience or recent training prescribed in rule 7.1 or that they are competent to practise.

8.7 A decision under section 9(1)(b) shall take effect:

(a) in circumstances where a Registrant has applied to the ARB under section 9(3)(a) within 14 days of the written notice being served, after:

(i) the circumstances in section 9(3)(b) are satisfied; and

(ii) the expiration of the appeal period in rule 7.5;

(b) in circumstances where a Registrant has not applied to the ARB under section 9(3)(a) within 14 days of the written notice being served, upon the expiration of the appeal period in rule 7.5; or

(c) where an appeal has been submitted, upon the determination or abandonment of that appeal.

8.8 A person falling within section 9(1)(b) who wishes their name to be re-entered in the Register under section 8 having been not re-entered in, or removed from, the Register following a notice under section 9(2), must satisfy the Registrar by way of a Registration Assurance Process that they are compliant with the scheme. .

8.9 For the purposes of this rule:

'continuing professional development activities' and 'the scheme' shall be construed in accordance with the Scheme for Continuing Professional Development published on the ARB's website and prescribed at rule 7.1; and

'CPD record' shall be construed in accordance with the recording of continuing professional development activities referred to in rule 7.2(a).

9. Renewal of registration

9.1 A Registrant wishing to retain their registration shall via the ARB's portal:

(a) complete a declaration, including confirmation of:

(i) compliance with the standards of professional conduct and practise expected of registered persons, including receipt of any disclosable criminal convictions or cautions; and

(ii) compliance with the scheme referred to at rule 7.1;

(iii) having provided the ARB with an email address at which they can be contacted for the purposes of registration and undertaking to update the ARB should that email address change; and

(b) make payment of any prescribed fee.

9.2 For the purposes of this rule, 'disclosable criminal conviction or caution' shall mean a caution or conviction other than one which a person is entitled by law not to disclose.

10. Removal of registration – request

10.1 Any Registrant who requests the removal of their name from the Register pursuant to section 3(3) of the Act, shall apply via the ARB's portal stating the grounds on which the application is made.

10.2 Any Registrant who requests the removal of their name from Register shall not be entitled to have their retention fee, or any part thereof, refunded.

10.3 Removal may be deferred where allegations of unacceptable professional conduct or serious professional incompetence are outstanding.

11. Removal of registration – non-payment of retention fee

11.1 Upon sending a written demand for payment of a retention fee by email or post, where a Registrant fails to pay:

(a) within 60 days; or

(b) in the case of a Registrant who has had their name re-entered in the Register following a suspension order under section 17 of the Act, within 14 days,

the Registrar may remove their name from the Register.

11.2 For the purposes of section 8(3) of the Act, re-entry to the Register following removal for non-payment of the retention fee shall be subject to payment of the retention fee and a further fee as determined by the ARB.

11.3 The Registrar may, at their discretion, waive the whole or part of the further fee referred to in rule 10.2 after consideration of the circumstances affecting any particular case.

12. Removal of registration – fraud or error

12.1 If the Registrar is satisfied that an entry in the Register has been obtained fraudulently or otherwise incorrectly made, the Registrar may remove the name of that person from the Register.

12.2 Where the Registrar decides to remove a person's name from the Register under this rule, the Registrar shall serve on that person notification of the reasoned decision and of their right to appeal within 28 days against the decision to the Appeals Committee.

12.3 A decision to remove an entry under this rule, shall take effect:

(a) upon the expiration of the appeal period specified in rule 11.2; or

(b) where an appeal has been submitted, the determination or abandonment of that appeal.

13. Re-entry to the Register following – failure to notify change of address

13.1 In relation to any person applying for re-entry to the Register following removal under section 11 of the Act, the Registrar may waive or vary:

(a) the requirements of rule 3; or

(b) any procedures operated by the Board to establish an applicant's standard of competence for the purposes of section 4(1)(b) of the Act.

14. Re-entry to the Register following an erasure order

14.1 A person seeking re-entry to the Register following removal by way of an erasure order must apply in a manner directed by the ARB.

14.2 Before considering an application for re-entry under this Rule, the Board must be satisfied that a person has successfully completed a Registration Assurance Process.

14.3 Before the Board directs a person's re-entry to the Register, it shall consider the recommendation made to it by the Registrar.

14.4 The prescribed period for the purposes of section 18(2)(b) of the Act shall be one year unless otherwise directed by the Board.

14.5 The prescribed period for the purposes of section 18(3) of the Act shall be 28 days.

15. Fees

15.1 The amounts payable as fees under sections 6(1), 6(2), 6A(2), 8(1), 8(3), 18(4), 21A(2)(c) of the Act and shall be published by the ARB on its website.

15.2 For the purposes of section 8(1) of the Act, the retention fee shall be determined by the Board, and if there is any change to the fee, it shall be notified and circulated to architects in the October preceding the year in which a change takes place.

15.3 The method of payment shall be via the ARB's portal and where payment is made by other means the ARB may charge an additional fee on a cost recovery basis.

16. Publication of disciplinary orders

16.1 Disciplinary orders made in relation to a registered person shall be shown in the Register for the following periods:

(a) where a Reprimand has been imposed, one year from the date of the decision of the Professional Conduct Committee;

(b) where a Penalty Order has been imposed, two years from the date of decision of the Professional Conduct Committee;

(c) where a Suspension Order has been imposed, two years following the end of the period of suspension.

17. Bodies Corporate, Firms and Partnerships

17.1 Section 20(3) of the Act shall not be applied to any body corporate, firm or partnership unless it has provided to the Registrar the following current information:

(a) the practising name and address of the body corporate, firm or partnership;

(b) the names and addresses of the relevant Registrants and the addresses of the business premises at which they are in full time attendance;

(c) the address of any other premises at which business is conducted by the body corporate, firm or partnership; and

(d) certification by a Registrant that all work, so far as it relates to architecture, undertaken at any premises of the body corporate, firm or partnership is under the control and management of a Registrant.

DRAFT

DRAFT

info@arb.org.uk

+44 (0)20 7580 5861

5th floor, 70 Gray's Inn Road
London WC1X 8NH

www.arb.org.uk