

ARB Consultation Response

PATHWAYS AND GATEWAYS

	Interim Report Reference		ARB Comment/Query
12	6.5	Once enrolled on a long and expensive education in architecture, there is very little opportunity to specialise or diversify due to the strict linear framework and numerous qualification criteria. In a fast evolving profession, the framework is in danger of producing a monoculture of architectural skill within the construction industry. Architecture graduates recognise this inflexibility, the limited scope for specialisation and its impact on the completion of their qualification. The average time taken from starting an architectural degree to registering as an architect is now 9.5 years.	There are a number of ARB-prescribed qualifications, both at Part 1 and Part 2 where architecture is studied along with other subjects or where there is specialisation – e.g., UWE – Architecture and Planning, Architecture and Environmental Engineering; Cambridge – Architecture and Urban Design; CAT - Advanced Environmental and Energy Studies etc. This is possible within the existing model of architectural education, which provides flexibility and still meets the minimum requirements of the Qualifications Directive.
	6.6	Students are expected to enter into thirty years of debt in order to fund their education. Many students on completing their studies today may ask themselves what could have been done differently, could it have taken less time and could it have been better? Students are a hugely varied group of people with different needs, hopes and personal circumstances, so whilst any generalisation concerning students' views is questionable, it does appear clear that greater choice and diversity would be more likely to suit the wishes of more students. Pathways that are more affordable could also advance geographical and social mobility. A more flexible education system could enable earning whilst learning as well as enable people to join the profession from non- cognate backgrounds. Flexible options for students might empower them to specialise or diversify. This flexibility could even encourage study and work abroad in order to develop skills that would ultimately enrich the competitive offer of UK architects.	<p>ARB would encourage the UKAE Review Group to note that work abroad is not discouraged. Study abroad poses some problems regarding the coverage of ARB's Criteria and/or the assurance of equivalence but guidance is available and there are routes available to registration (e.g., the prescribed exam/study abroad schemes/ direct entry) for those who have some relevant overseas study.</p> <p>Mobility within the UK between Parts 1, 2 and 3 is also a strong characteristic of the current model of architectural education, which is not necessarily the case in other European Member States.</p> <p>More generally, the Group may wish to explore the impact that changes in Higher Education are having on other professions in the UK.</p>

15	7.2	<p>In England the public funding of teaching for the majority of architecture programmes effectively ceased entirely in 2012. Higher education funding was instead balanced by a typical 260% rise in tuition fees. For architecture the mode yearly fee was £9,000 in 2012 (the maximum permissible). No English school of architecture has set its standard fee for home students below £7,920 per year. In addition to the loans made available to students to cover their tuition fees, maintenance loans are available to the value of £5,500/yr outside of London and £7,675/yr within London. Interest on the accumulated debt is payable at a rate equal to the retail prices index (RPI) measure of inflation, rising to RPI+3% for higher earners. Repayment of the loans is collected via the PAYE system based on 9% of income above a threshold of £21,000/year, with outstanding debts written off after 30 years. According to a survey of existing students in the UK in 2011 the average total cost of education as an architect is £88,7267.</p>	<p>As ARB understands it, the 2012/13 tuition fees for Hull School of Art and Design and the University of Ulster were £6,000.</p>
	7.10	<p>During this period of radical change in the funding of higher education, UK architectural education has also been subject to a period of uncertainty resulting from the revisions to the Professional Qualifications Directive (PQD). This process began in 2011 and at the time of writing had yet to be concluded. The direction of travel within the EU appears to be for greater prescription, longer minimum time requirements and additional qualifying criteria. At a time when UK architectural education is in most need of a flexible framework to deal with unknown future circumstances, the EU appears to be moving in the opposite direction. The UK is currently the only EU member state where there is no direct state funding of undergraduate education for architecture. It is perhaps unsurprising in these circumstances that the higher education sector in the rest of the EU is promoting a framework the consequences of which are misaligned with the requirements of the English and wider UK higher education sector.</p>	<p>The review of the Mutual Recognition of Professional Qualifications Directive is expected to be fully complete at the end of 2013/early 2014.</p> <p>To date, the UK has been successful in negotiations regarding the revised Directive, and although it is not yet certain, it is likely that the revised Directive will include provision for a minimum requirement of four-years academic study with a period of mandatory practical training experience. It is helpful that the European authorities have recognised the value that practical experience contributes to the training of architects.</p>

7.14	<p>New methods of delivering higher education are developing at a rapid pace. Blended learning, distance learning and mass open access on-line courses (MOOCs) could all have an increased impact in architectural education in the next decade. The existing framework is based on the traditional methods of higher education delivery measured in years of study. This framework is unsuited to, or fails to address, new methods of delivery which will be increasingly important in the future.</p>	<p>The method of delivery is entirely up to schools and many of the methods cited either already exist or could potentially be introduced within the current structure. The boundaries of the existing system have not yet been tested.</p> <p>The revised and future Directives may also contain opportunities regarding the use of ECTS credits to measure the duration of study, however, we appreciate that developments in this area may not be moving as swiftly as the UK would wish.</p>
8.3	<p>The Architects Act enshrines the PQD within UK law and in the case of architecture the relevant clauses of the PQD are generally found in Articles 46 and 47. The legislative framework allows the UK to set its requirements for UK registration at a level higher than the minimum requirements specified by the PQD, and this is something the UK has chosen to do. As a result the minimum period of academic study in the UK is 5 years rather than 4 and two years of qualifying professional practical experience (PPE) are required in addition. The UK's Part 1, 2 and 3 requirements result in a registrant through the UK route having to demonstrate compliance with 106 criteria, rather than the 11 required by the common European standard established by the PQD.</p>	<p>It is misleading to suggest that considerably more is expected of UK students. The 11 points have always been considered too vague by many UK schools – this was reiterated when the Criteria were reviewed in 2010. (SCHOSA members were represented on the review group and responded to the consultation). The additional UK Criteria are an expansion of the 11 points providing more detail as to how they should be interpreted within the UK context.</p> <p>This paragraph also suggests that it is the high number of criteria that have determined the period study for UK registration which is not correct. The current framework reflects the UK pattern of Higher Education and that adopted by the majority of European member states under the Bologna Agreement.</p>
8.4	<p>The ARB has also chosen to adopt a policy position that only qualifications which meet the minimum eligibility requirements set out in the PQD are prescribed in the UK. This is a policy position adopted by the Board and the ARB could chose to prescribe qualifications for the purposes of UK registration which did not fully comply with the PQD eligibility requirements by simply revising this policy. Although this change is a matter for the Board there is a perception within the ARB</p>	<p>It would be clearer to say that ARB has chosen to adopt standards that all qualifications are required to meet (and which meet the minimum eligibility requirements set out in the Qualifications Directive).</p> <p>There is nothing to suggest that the UK Government and BIS would</p>

		that the European Commission and the Department of Business, Innovation and Skills may not be supportive of such a change.	or would not be supportive of any change. Both bodies would be important stakeholders in any discussions and may have views on the impact that any change would have on the UK's position in European and internationally.
19	8.9	The primary purpose of prescription, as established through the Act, is to ensure that minimum standards of competence are met by any individual authorised to use the title Architect in the UK. The register of duly qualified individuals is maintained by the ARB. This is intended to provide a degree of protection to the consumer of architectural services and ensures the protection of the title Architect as a consequence. The principle of using regulation to clearly focus on ensuring competency standards at the gateway to the profession underlies the Review Group's proposals. The Review Group has adopted an associated critical questioning of intermediate qualifications where such prescription is not explicitly required in the legislative framework. A similar approach has been taken with respect to the use of eligibility requirements within academic pathways where such requirements are again not explicitly required by the Act.	It would be clearer to state that 'The primary purpose of prescription, as established through the Act, is to ensure that minimum standards of competence are met by any individual authorised to enter the Register and practice using the title Architect in the UK.'
	9.3	The current system is also relatively closed to entry at any point other than Part 1 admissions. Students who discover they may wish to transfer into a prescribed architectural programme at any stage after year 1 are typically excluded from doing so. Similarly students who may wish to branch out beyond a traditional generalist education in architecture are typically required to do so outside the prescribed pathways. As a consequence of these characteristics the existing system of architectural education is perceived by some students as a pipeline to the profession with one entry point and a singular linear progression (see figure 1). The exit points at Part 1 and Part 2 are similarly perceived by some as "failure points" for those students unable to stay the course.	Credit transfer is widely available into either year 2 or year 3 of a Part 1 qualification. In ARB's experience institutions will often take both previous qualifications and experience into account in determining the appropriate entry point. We would also note that a large number of institutions offer alternative awards for students who are unable to meet the Criteria and complete the prescribed qualifications and/or choose to pursue other career paths.
21	9.4	The content of prescribed (ARB) and validated (RIBA) architectural qualifications is	ARB's expectations are that the learning outcomes should meet

		specified through the ARB and RIBA's joint criteria for Part 1, 2 and 3 qualifications. These criteria are subject to periodic revision processes which are independent of the framework for architectural education in which they operate. The criteria are part of the framework but the manner of their inclusion, in their current form, is not a matter of necessity under the legislation.	the Criteria. The content of a qualification is determined by the institution.
	9.5	The ARB and RIBA criteria are not the only criteria which HEIs must consider with respect to architectural qualifications. Other professional bodies and organisations have established their own criteria and those programs which are accredited by these bodies must also consider these requirements. Some programmes also seek accreditation overseas in countries, such as India, for the benefit of their overseas students and such accreditation carries its own obligations.	We assume this means that HEIs are seeking to meet the criteria of more than one professional body given that the Criteria for the prescription and validation of qualifications are held in common and also form the basis of the Quality Assurance Agency's Subject Benchmark statement.
	9.6	Compliance with ARB prescription criteria is monitored annually through a process of annual returns and periodically through a process of peer review. Typically architecture schools employ the RIBA's quinquennial visiting board process as the peer review mechanism for prescription. This visiting board process, which includes interim visits to monitor progress, is also employed by the RIBA for the purpose of validation.	The ARB prescription process is not strictly one of 'peer review', nor is it based solely on information provided by peer review (e.g. a RIBA Visiting Board Report). ARB's expectations are that applications/annual monitoring submissions are formed of information which is readily and typically available within an institution. Those scrutinising applications are not necessarily architects or architectural academics.
25	11.3	<p>What is the impact of the existing framework of architectural education?</p> <ul style="list-style-type: none"> • It ensures a common structure across UK architectural education and influence in global architectural education • A 9.5 year average duration of study • A relatively high cost of regulation for both the schools and the profession • The requirement for public subsidy (currently through the provision and of student finance) • Very little structural diversity among the programmes offered 	This paragraph refers to the 'relatively high cost of regulation for both the schools and the profession'. ARB deliberately operates a submission-based process to help institutions avoid incurring costs. ARB's costs in this area have reduced significantly in recent years. ARB has been commended by external bodies for its approach to prescribing qualifications.

		<ul style="list-style-type: none"> • Very little professional specialisation in academic programmes • Limited or restricted access at any point other than Part 1 entry • Anomalies resulting from barriers to entry or inequitable standards applied to non-standard pathways • Little connectivity with the educational pathways of associated professions 	
26	12.1	<p>Given the Review Group’s task to review the current framework a core element of the process was to establish any shortcomings in the existing system. The Review Group explored in some detail the perceived anomalies which result from the existing framework and its interpretation. More general adverse consequences of the framework were also articulated in discussion as listed below:</p> <ul style="list-style-type: none"> • The lack of distinctive programme structures and educational offers • The exclusion of overseas entrants • The exclusion of entrants from non-architectural level 6 degrees • The sense of failure for those that don’t complete all three Parts • The need to decide at 17 years of age that you wish to enter the profession • The significant barriers to later entry for second career architects. <p>The anomalies created by the current framework affect only a minority of students. Nevertheless one test of any framework is the extent to which it is able to accommodate non-standard cases in a fair and reasonable manner. The following anomalies were discussed by the Review Group as a means to explore broader characteristics of the existing framework.</p>	<p>There is a route for overseas entrants via the Prescribed Examinations. ARB is not alone in requiring an assurance of competence from those with overseas qualifications, many other countries have systems for ensuring this, some of which are more onerous than the prescribed examinations and some less.</p> <p>The report refers to a ‘minority of students’, however, it is not clear how many students are affected. We feel that it is important to understand the scale of the problem in order to determine the proportionality of any proposals.</p>

	12.2	<p>The EU allows for mutual recognition of qualifications between member states and entitles EU nationals who are fully qualified in an EU member state to be automatically entered into the register in another member state. The numbers of new entrants on to the UK register who have taken this route account for more than a quarter of all new entrants onto the UK register. The professional qualification requirements in member states are however not identical. Some EU states require a minimum of four years of academic study, some require six. Some states require no professional practical experience some require two years. The anomaly arises in as much as in any year an EU national would be able to gain entry onto the UK register without meeting the eligibility requirements in the UK. In any office two candidates may sit side by side, one may be entitled to use the title Architect through taking the mutual recognition route whereas the other , who may have studied for longer and have more practical experience would be ineligible to enter the register due to failure to meet the UK pathway requirements.</p>	<p>The important and principal aim of both the Qualifications and Services Directives is to facilitate mobility within Europe.</p> <p>The Qualifications Directive does not state that state that it allows for ‘the recognition of EU nationals who are ‘fully qualified’. More accurately, it allows for recognition of those who meet the requirements of Article 46 and have access to the profession in their home state.</p> <p>The Criteria are based on the 11 points of Article 46 therefore all those joining the Register, either through the UK route or the EU route, will have a common academic background and will meet these as a minimum. The structure of courses and Higher Education in other member states may differ but all will meet, as a minimum, Article 46, as well as any additional access to market requirements.</p> <p>This is the basic principle within the Directive and must be applied by law. An appropriately qualified UK architect would equally be able to gain entry onto the register of another Member State without meeting the eligibility requirements of that State.</p> <p>Many of those who join through the European route either hold a UK Part 3 or go on to take one because the employment market requires it.</p>
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		<p>Illustrative example 1</p> <p>Two school friends, Emma and Zac, decide they both wish to become architects. Emma goes to Germany, attracted by a combination of factors including the teaching being largely in English, the 900 Euro annual fees and the relatively short 4 years duration of the course. After graduating she works in Germany for two years and having met the minimum requirements for German registration she returns to the UK. She applies to the ARB for entry onto the register under the mutual recognition arrangements in the EU and gains automatic entry. She immediately sets-up an architectural practice in her own name.</p> <p>Zac decides to study in the UK. He completes a three year undergraduate degree, a year's placement and a two year MArch before returning to his home town. There he reunites with his school friend Emma and he agrees to work for her in her new practice as an architectural assistant. Although perplexed by the anomaly that has resulted from their contrasting educations.</p> <p>Emma agrees to supervise Zac's professional experience in preparation for his Part 3 exam; an exam Emma has never sat.</p>	<p>In practice no Member State now requires just 4 years of study. Where courses are only 4 years, there is also a requirement for practical experience of either 2 or 3 years. Many Member States where 4-year courses was the norm, have or are moving to 5 years of study following the Bologna pattern.</p> <p>We also feel that the example is too simplistic, it does not take into account the cost of living and of moving to another country in calculating the cost of education. ARB experience also shows that a high proportion of students who move to the UK from Germany will take a Part 3 qualification. Additionally, we would query whether the example is practical given the current market.</p> <p>We would question whether the scenario for Emma is realistic in today's economy and whether would be an appropriate supervisor as this would be a decision for a Professional Studies Adviser. ARB expects decisions of this nature to be taken on a case by case basis and there should be no assumption that someone in Emma's position would be considered an appropriate supervisor.</p>
27	12.3	<p>The current framework allows for candidates with non-prescribed qualifications to meet the eligibility requirements for UK registration by successfully undertaking one of the ARB's prescribed examinations. These examinations are designed to ensure equivalence to the holder of a UK prescribed qualification. Typically these examinations are sat by students with overseas qualifications which may or may not be RIBA validated. This route to registration is also used by holders of non-prescribed UK qualifications which may be in architecture or principally in architecture. The combined cost of both the Part 1 and Part 2 examinations is currently £3,342 (£1,671 each) and both must be passed in the case of students with no prescribed Part 1 or Part 2 qualification. Students who take this route to registration are not eligible for automatic recognition within the EU regardless of</p>	<p>The Prescribed Examination only assesses equivalence at Part 1 and/or Part 2. Candidates with non-prescribed qualifications will still have to take a Part 3 qualification in order to be eligible to apply for UK registration.</p>

	<p>nationality as their academic qualifications may not have met the PQD requirement with respect to the location of study (i.e. overseas award holders would not have undertaken their education mainly within the EU) and the prescribed examination is not an Annex V listable award.</p>	
28	<p>Illustrative example 2 Two students, Jane and Theo, from Australia’s leading RIBA validated Part 1 programme decide to study for their Part 2 in England. They choose one of London’s leading Universities after having been impressed by the course on offer. They complete their Part 2 and both are interviewed by the same external examiner in the presence of their full MArch portfolio. The external examiner duly completes the standard report form which includes a statement saying that every graduate has met the requisite criteria.</p> <p>Jane and Theo decide they wish to stay in the UK and they wish to register in the UK as Architects. They are advised by the ARB that they require a UK Part 1 and that they can sit the ARB’s prescribed Part 1 for a fee of £1671. They are also told they are free to submit their Part 2 portfolios for the Part 1 exam. When completing the application forms Jane and Theo are pleased to see the criteria for Part 1 are the same as those they have already satisfied for Part 2. The only differences are the attributes required and in all cases the Part 2 attributes are more onerous than those for Part 1. Both submit their complete Part 2 portfolios with their supporting documents.</p> <p>Jane passes the exam but is left wondering why the ARB required her to sit an exam and pay £1671 when she already had a prescribed ARB qualification which had a higher threshold pass standard.</p> <p>Theo fails the exam on the basis two criteria were not adequately demonstrated. He immediately seeks legal advice on the basis that the ARB which failed him was the same organisation which prescribed the higher award he already holds. That qualification was based on the same evidence that he submitted for the prescribed</p>	<p>The difference between the Part 1 and Part 2 criteria are the attributes. The statements in this example are a rather simplistic interpretation. The attributes should not be seen in isolation, they describe the level at which the criteria should be applied and met. The Part 2 attributes are more onerous therefore the learning outcomes should be met at a level different to that expected at Part 1.</p> <p>The exam is an assessment of an individual’s competence and is based on the material each individual submits. This and the interview would have to be identical to ensure the identical result. The example suggests that students with the same degree will have identical portfolios and approach the prescribed exam in the same way.</p> <p>We assume that in this scenario institutions would provide clear advice and guidance to the individual about the requirements for registration in the UK on entry to the Part 2 qualification as per the standard conditions of prescription.</p>

		exam. How on earth could the outcome for one be a pass and the other a fail?	
29		<p>Illustrative example 3</p> <p>Anne is 17 and is torn between studying Architecture and Engineering. She decides to do a 4 year Master’s degree in Architectural Engineering in which she’ll be taught alongside architects during projects in years 1, 3 and 4. By the end of year 3 she knows her passion and talent lie with architecture, but with no opportunity to transfer, and being close to graduation, she chooses to complete her course. She passes with 1st class honours. Anne is offered a job working for a local Architect who had tutored her. She gains good practical experience and completes numerous competitions with the help of some advice from her team leader. After two years she has an impressive portfolio and is successful in her application to a Part 2 course, with the admissions tutor clearly seeing her potential. In her Part 2 she flourishes, graduating top of her year and is nominated by her school for the RIBA silver medal. She goes back to her practice with renewed confidence in her career. In order to develop her career she completes a Part 3 course at a leading London school which is offered to students without the need for Part 1. Her practice is keen to develop her role and asks that she registers as an Architect. She applies to the ARB but is deemed ineligible for the Part 1 prescribed exam on the basis that her undergraduate degree did not contain sufficient architectural content. She’s informed that her practical experience and Part 2 qualification were not taken into account in making the decision. She’s advised that if she wishes to register she’ll have to go back and get an undergraduate prescribed Part 1. The partners in her firm are left dumbfounded when she hands in her notice three months later in order to start her new undergraduate degree. Luckily Anne’s parents agree to pay the annual £9,000 fee as Anne is no longer eligible for a student loan.</p>	This example provides some interesting areas for exploration. Schools of Architecture play a key role in the pre-Part 2 stage.
12.10		These anomalies, although affecting a relatively low number of individuals, point to areas of unfairness or dysfunction in the operation of the regulatory system, highlighting the strategic	ARB looks forward to exploring these in greater detail in due course, noting that one of ARB’s key objectives is ensuring that individuals entering the Register are competent to practice.

		flaws in the current framework.	
	13.3	<p>Those students who are suitably able and willing to study the subject should be able to do so.</p> <p>(i) Unnecessary barriers to entry or controls on access to education should be minimised and any future framework should avoid imposing them. These considerations should include awareness of the costs of education borne by the student, including cases where architecture may not be their first degree.</p> <p>(ii) The view that UK Universities simply train too many architects is still one that is heard in the debate concerning architectural education. There is now a widespread realisation of the fact that the modest growth in the number on the register in the recent past is due in large part to architects joining through the European mutual recognition route without any UK qualifications. In the five years 2008-12 (inclusive) the number of architects on the UK register increased by 1,853. In the same period 2,058 Architects joined the register through the mutual recognition EU route (source: ARB). The idea that the UK can control the numbers of architects in the UK by restricting educational opportunities fails to recognise the fact that the UK has no control over those architects from other member states that decide to register here. Furthermore there appears to be no direct correlation between the number of architecture students in the UK and the numbers choosing to enter the profession in the UK.</p>	We would support initiatives which encourage mobility.
34	15.1	<p>Rigorous standards of professional competence:</p> <p>(i) Currently the eleven EU criteria are demonstrated at Part 2, with Part 3 being the final examination leading to registration. This final examination does not cover the whole professional syllabus but rather the professional and legal aspects. There is no time restriction in terms of the time between when individuals might obtain Parts 2 and 3 and it is possible for many years to pass between the two. At entry to the profession no assessment is made of competency in the majority of the syllabus and it is quite possible for a successful candidate to obtain a current</p>	<p>The 11 Points within the Criteria are not only demonstrated at Part 2, they must be met at both Part 1 and Part 2 levels.</p> <p>It is misleading to say that there is no requirement for CPD between completing Part 2 and taking Part 3 - 'recent' practical experience is a requirement for registration, i.e., recent experience of architectural practice. This is the means by which ARB ensures that those entering the Register are keeping up to date. Part 3</p>

	<p>Part 3 and hold a Part 2 based on superseded criteria. There is no applicable requirement for CPD in the period concerned. A framework which requires a thorough test of all the requisite competencies at the point of registration would arguably offer greater assurance with respect to the standards of competency demonstrated by new entrants onto the register.</p>	<p>providers can (and do) express concern about the currency of academic qualifications if candidates have no recent practice.</p>
15.2	<p>Competitiveness</p> <p>(i) UK architectural education has to compete with all other subject disciplines in the UK for the brightest and best talent. It similarly has to compete with other providers of architectural education across the world for overseas students. Within the EU it has to compete with heavily subsidised programmes in architecture with institutions that charge no tuition fees. Other EU programmes are increasingly being taught in English by English tutors.</p> <p>(ii) The existing regulation of architectural education creates constraints where programmes appear overly fettered, limiting the development of truly innovative education offers and modes of delivery in response to the changing demands of students and employers. In this context any over regulation of UK architectural education can be seen to inhibit its ability to respond creatively to market demand or develop new, attractive programmes and therefore to remain competitive.</p> <p>(iii) Architecture can offer a fantastic undergraduate education suited to numerous future career paths in terms of the transferable skills it develops, and yet it is seldom perceived as such or marketed in this way. Relaxation of the regulatory demands at undergraduate level would encourage programmes to develop with wider explicit career trajectories than those envisaged by standard Part 1 programme prospectuses.</p> <p>(iv) Currently there is nothing to prevent any HEI offering courses in architecture which are outside the requirements of the prescription process. Whilst such programmes may attract some applications it is undoubtedly the case that most entrants into an architecture course wish to have the option to progress into the profession, even if they subsequently decide to pursue another career. Any architecture programme which seeks to establish a place in the higher</p>	<p>The existing system is designed so that it is not over-regulated. Provided learning outcomes are met, institutions are free to determine how these should be delivered.</p> <p>It is misleading to say that non-prescribed qualifications are 'unlikely to survive long'. There are a number of such qualifications that have been in existence for some time e.g. Anglia Ruskin University, University of Derby, University of Salford, Ravensbourne College of Design and Communication). It should be noted that there is scope within the current framework for innovative qualifications but to date we have had no formal applications for any truly innovative offerings. As noted above, architectural education is about more than registration and institutions develop qualifications and awards which do not necessarily lead to registration.</p>

		education market and which does not have prescribed status is therefore at a substantial competitive disadvantage in terms of recruitment and experience suggests it is unlikely to survive long. Prescription is therefore a competitive pre-requisite for virtually all architecture programmes. The regulation of education should acknowledge this broader context as an inappropriate framework can have the unintended consequence of excluding variety in academic courses.	
35	15.3	<p>Accessibility, mobility and connectivity:</p> <p>(i) The cost of a 5-year full-time architectural education is currently £76,968.24. Earnings in the profession are currently lower than for any other profession with a five year academic requirement. The average time from entry onto a Part 1 course to registration is currently 9.5 years. It appears that students from the lower NSEC quintiles which do not qualify for widening participation financial assistance find the level of debt associated with an architectural education a disincentive to entry. There is also concern that women find a 9.5 year pathway a greater disincentive than men. As of December 31st 2012 only 21.4% of registered architects were women (source: ARB). Recent figures also suggest applications from mature students in England have fallen disproportionately since the introduction of the new fee regime.</p> <p>(ii) The current automatic recognition requirements necessitate students completing their architectural education in a single EU member state. Students who move between EU states for their undergraduate and postgraduate education typically have to submit themselves to an additional examination for purposes of UK registration. Students from RIBA validated schools outside Europe typically have to submit to a UK equivalence exam as their qualifications are not recognised for registration purposes. There is therefore a considerable disincentive for mobility between countries in the current system. The proposed PQD also discounts professional practical experience from outside the EU irrespective of the quality or relevance of this experience. In a future of increasing internationalisation of architectural practice this appears inappropriate.</p> <p>(iii) The pipeline to the profession created by the current framework makes entry at any point other than at the start of an undergraduate degree extremely difficult.</p>	<p>It is misleading to quote statistics for the whole Register as these are distorted by historical reasons why architecture was not an attractive career for women. The proportion of women on the Register is increasing and the proportion of new registrants who are female is also increasing. This includes the years when the fees increased.</p> <p>50% of those applying to take the Prescribed Exam are female.</p> <p>There is a route for those with overseas qualifications, the UK is not alone in requiring those in this position to take additional examinations/qualifications.</p> <p>ARB has created versatile approaches to scenarios where individuals undertake qualifications in different member states.</p> <p>There are sound reasons why some students are ineligible to take</p>

		<p>For example a student with an ineligible degree in an associated subject and with several years of experience in architectural practice would be faced with having to return to undergraduate education in order to pursue a career as any architect, regardless of their level of competence (see Section 12, Anomaly 2). The lack of mobility between associated disciplines was a recurrent concern in the evidence heard by the Review group during its discussions.</p> <p>(iv) The current framework of UK architectural education includes periods in practice, typically at the end of Parts 1 and 2. The Part 3 is seen as the practical examination and exists in a variety of different forms such as a PG Certificate. The structure can sometimes reinforce the perceived separation between practice and university and the areas of study undertaken in each. For overseas students this structure is increasingly problematic given the approach of the UK Border Authority (UKBA) where overseas students without a sponsor organisation can find the right to remain in the UK swiftly expires. The sort of integrated placement which solves this problem would fall outside the eligibility requirements of the revised PQD as currently drafted.</p>	<p>the Prescribed Examination, i.e., that they have not met the required criteria through their academic study. The Prescribed Exam is not intended as a way to make good the shortfall in an applicant's academic background. Evidence has shown, in the past that those who have accessed the exam following a degree in a subject other than architecture or where architecture is only a minority element, have not been successful.</p> <p>It would be open to institutions to come up with proposals for a conversion route as is the case in other professions.</p>
15.4		<p>Equity:</p> <p>(i) For students entering the register by the EU mutual recognition route the eligibility requirement may be less stringent than for those entering from a UK route. This is demonstrably inequitable.</p> <p>(i) There is a perception among those involved in UK architectural education and the prescribed examination that the latter has a more onerous pass requirement than that applied at the lowest end of the marking range in some prescribed programmes. This impression would seem to be supported by the number of Part 1 failures recorded by students who have been required to sit the prescribed examination following the loss of prescribed status of the programme in which they were enrolled.</p>	<p>It is misleading to suggest that requirements for those applying for registration through the European route are less stringent than those for the UK route. They may be less stringent, or they could be more stringent, the UK is in the middle of the spectrum. However, all will meet the academic requirements of Article 46 - it is only the access to market requirement that differs. It should also be noted that it is a legal requirement that qualifications meeting the requirements of the Directive are mutually recognised.</p> <p>This suggests that loss of prescription is a regular occurrence. It should be noted that only one school has ever lost prescribed status and this would only ever happen if an institution's qualification was failing to meet the requirements set out in ARB's</p>

			Procedures. It should not be surprising therefore, if those students undertaking a failing qualification then go on to fail the prescribed exam. In this particular instance, those students who did pass the exam had provided more evidence than simply their Part 1 level work.
15.5	Flexibility (i) The regulation of the pathway under the current framework creates constraints on UK higher education providers in terms of the educational offers they are able to provide. This is partly to do with the time requirements which are measured in years regardless of the number of credits achieved by the student in that time and regardless of whether the academic year in question contains 22 teaching weeks or 46. (ii) For example a standard UK integrated master's degree of the sort offered by courses leading to Chartered Engineer status are precluded on the basis of duration of study. Similarly year-long Part 2 courses consistent with the standard three semester UK MSc model are also excluded. (iii) Joint courses are problematic due to uncertainties regarding how the "80% principally in architecture" requirement will be measured or assessed. Courses wishing to adopt various learning and earning structures also fail to meet time pre-requisites. (iv) Recent 2+2 undergraduate programmes seen in other disciplines where overseas students may study overseas for 2 years followed by 2 years in the UK fall foul of EU study location requirements, and are therefore also ineligible for prescription.		It should be noted that '80% principally in architecture' is a European requirement. Joint programmes can also be problematic for the QAA as there must be a 50%/50% split where institutions use 'and' e.g., Architecture and Environmental Engineering. Different proportions are permissible where 'with' is used.
36	15.6	Excellence: (i) Currently the vast majority of schools apply for validation for a variety of reasons, including the recruitment advantages which such status bestows. Visiting boards are typically used by schools as the peer review mechanism required by prescription. In the past, at the time of joint visiting boards, the wording of visiting	It should be noted that only one school has ever lost prescribed status and this was not based solely on a validation report. ARB is concerned about the allegation that visiting boards are

	<p>board reports has been sufficient to be instrumental in programmes losing their prescribed status even though validation was never removed in these instances. Recent visiting boards have therefore found it necessary to be very circumspect in the language they use and schools have been very nervous of any critical comment that may be open to interpretation.</p> <p>Recently visiting boards have explicitly sought to move away from the perceived focus on the lowest passing portfolio to consider quality issues more widely. However the peer review role inevitably carries with it the requirement for a quasi-regulatory scrutiny. The RIBA has not removed validation from any programme since 1974. Prescription has been removed on several occasions in this time. This suggests the standards applied by the regulatory and professional bodies are not fully aligned. It would appear that the professional body might be most effective in its roles of enhancing quality and promoting excellence and any framework should recognise this.</p>	<p>adjusting their reports because of the effect they believe they may have on the prescription of a qualification.</p>
15.7	<p>Efficiency:</p> <p>(i) The three part framework of the architectural education pathway requires the ARB to prescribe all three levels. This is the case even though there are no criteria prescribed at Part 1 in the PQD and the UK is unique in Europe in requiring regulation of this intermediate award against all the PQD criteria at undergraduate level. In 2012 the ARB had to monitor and approve 148 Part 1, 2 and 3 programmes at the expenses of the profession whose registration fees fund the ARB's operation. This is a time consuming process for both the ARB and higher education providers. In 2011 the number of students entering the profession by the UK route was 823 (source: ARB). The profession therefore had to maintain the prescribed status of more than 140 courses in order that 823 students could demonstrate the required level of competency. The removal of the requirement for Part 1 would lift sixty programmes outside the prescription process.</p> <p>(ii) In order to maintain a Part 1, 2 and 3 pathway for students with overseas qualifications the ARB also has to maintain and operate the prescribed examination system. This is largely self-funded by examination fees which are</p>	<p>Assuring the standards of those entering the Register is a core function for any regulatory body. For the institutions, prescription should not be too onerous, most of the documents submitted are standard documents prepared for other purposes and are readily available within the institutions. It is less onerous than the validation process.</p>

		£1,671 for one part or £3,342 if both Parts 1 and 2 are required. Some fixed costs associated with maintaining the system are borne by the profession through the annual registration fee. In 2011 this system had to be maintained in order to carry out 126 examinations at either Part 1 or Part 2 level (source: ARB). A significant number of these examinations were at Part 1 for students who already held a prescribed Part 2 award.	
37	15.8	<p>Distinctiveness:</p> <p>(i) The relatively rigid structure of the existing pathway regulation results in relatively little distinctiveness in terms of programme structure in UK architectural education. Only one school in England and Wales offers both Part 1 and 2 programme structures which lie outside the normal 3 plus 1 plus 2 model and this school is subject to consistent pressure applied through both the RIBA visiting board process and the ARB prescription process to justify its structures, or bring them into alignment with the standard model.</p> <p>(ii) It is perhaps worth noting that despite claims being made concerning the variety of the education offered under the existing framework, there are currently no specialist prescribed Part 2 courses in subjects such as Architecture and Low Carbon Design, Architecture and Conservation, Architecture and Management or many other of the numerous subject combinations which HEIs might wish to provide. This is due to the perceived difficulty in gaining validation and prescription for such programmes, a perception which appears to be well founded. This barrier to innovation has proved insurmountable despite the potential attractiveness of such courses to both students and employers. Any framework should be flexible enough to enable distinctive education offers to develop. This should include potential specialisation during graduate studies allowing students to choose an education which allows career development in specialist fields at master's level.</p>	It is unclear what is meant by 'consistent pressure applied through both the RIBA visiting board process and the ARB prescription process to justify its structures, or bring them into alignment with the standard model'. There are a number of qualifications that fall outside what could be termed 'standard models', e.g., Cardiff University/University of Cambridge/Centre for Alternative Technology/University of the West of England. The test for achieving prescription is applied equally no matter what the format of the qualification for which prescription is sought might be.
39	17.1	The proposal would establish a single gateway to the profession at the point of registration referred to as the Prescribed Professional Qualification (PPQ). This	

		gateway qualification would include an examination of all the requisite individual competencies and eligibility requirements. Successful candidates would receive a qualification which would be proposed as listable under Annex 5 of the Directive where all the PQD requirements were demonstrated. Alternatively successful candidates would receive a qualification prescribed for registration in the UK only in instances where the UK requirements were met, but not the full PQD eligibility requirements	
17.4		The RIBA could continue to accredit and validate schools of architecture in the way they currently do and it is anticipated that all schools of architecture would wish to maintain their validated status as an internationally understood indicator of quality, as a marketing requirement and as part of its own industrial liaison processes. Validation would not form part of the registration criteria, as is currently the case. The proposals would make the RIBA validation status between UK and overseas schools transparently equitable which would serve to remove the current confusion whereby some students, perhaps understandably, mistakenly believe that RIBA validated courses provide a pathway to registration.	Validation does not form part of registration. There are several ARB-only prescribed qualifications.
19.5		Higher education providers in the UK would be freed from the requirements which regulate the academic pathway allowing more flexible routes to emerge. Arbitrary eligibility requirements would be removed allowing many routes into the profession and encouraging many opportunities beyond it.	It should be noted that eligibility requirements are not arbitrary – this assumes they are not predictable or certain (and that they have been applied without due consideration or process) which is incorrect.