



Board Meeting

23
November
2017

Agenda Item

9

Subject Review of ARB's Procedures for the Prescription of Qualifications
Purpose For Decision
From Emma Matthews - Head of Qualifications & Governance

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1. Summary

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

Once the direction of travel is known, ARB should engage with the Department for Communities and Local Government (DCLG) to ensure that any next steps on the review are clearly understood by the Department.

To consider DCLG's concerns around undertaking the review twice in short succession, and destabilising the UK's position whilst exiting the EU and jeopardising possible negotiations with the rest of the world.

2. Recommendations

It is recommended that the Board:

- i. notes the summary of the pre-consultation feedback relating to the Procedures Review;
- ii. notes the Procedures Task and Finish Group's recommendations at key point iii) and agrees that these, along with the Staff's suggestions in key point iv) should form the basis of the next steps of the review; and
- iii. instructs the Task and Finish Group to develop revisions of the Procedures ready for consideration within the timeframes as set out in the project plan, subject to any concerns from DCLG.

3. Open Session

4. Contribution to the Board's Purpose and Objectives

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

In line with Section 4(1)a of the Architects Act 1997, the Board is responsible for determining what qualifications and practical training experience are required for entry to the Register

under the UK route to registration. In order to ensure that individuals have met the appropriate standards on entry to the Register, the Board has established a prescription process for recognising qualifications and practical training experience as well as the criteria which must be met at the appropriate levels.

The Procedures for the Prescription of Qualifications document sets out the detailed process which the Board undertakes when dealing with the prescription of a qualification for the first time as well as with renewing prescription of existing prescribed qualifications. The Procedures also set out the details of the annual monitoring process, which dovetails with the renewals process. The Procedures are therefore important in terms of assuring the users and potential users of architects' services that a clear and transparent process for reviewing qualifications exists and assists in ensuring that individuals who are on the Register have the appropriate minimum levels of skills and expertise.

The Procedures document also provides information to institutions in terms of the requirements and conditions that must be met in order to secure and maintain prescription.

5. Background

- i. At its meeting on 12 May 2017, the Board agreed the following high-level objectives for a 'business as usual' review of the Procedures for the Prescription of Qualifications:

Any revised or updated procedures for the prescription of qualifications should enable the Board to:

- Continue to discharge its functions under Section 4(1) a and 4(1) b of the Architects Act 1997;
- Ensure that its processes for prescribing qualifications, renew prescription of existing qualifications, dealing with annual monitoring submissions and course and title changes continue to be clear, transparent, proportionate, efficient and effective;
- Ensure that its processes support the admission of competent individuals to the Register on completion of their studies and practical training experience; and
- Ensure that qualifications, and, where appropriate, experience it prescribes meet the requirements of the Mutual Recognition of Professional Qualifications Directive so that the UK's qualifications can continue to be listed under Annex V of the Directive as well as any additional requirements the Board may wish to set over and above this.

The Board noted and agreed that the Review of the Procedures must be based on the Board's current requirements for entry to the Register which state that individuals must hold Part 1, Part 2 and Part 3 qualifications in order to enter the Register. It was noted that the current entry requirements to the Register could not be reviewed until the Department had confirmed that the Board can progress a review of the UK routes to registration.

- ii. At its meeting on 13 July 2017, the Board agreed the outline project phases and timeframes. A copy of the project phases and timeframes can be found at **Annex A**. The Board has received regular updates regarding the progress of the Review at recent meetings. A pre-consultation exercise has been undertaken, where we sought feedback from a wide range of stakeholders through a series of round table meetings and an on-line survey. We also received individual, personal feedback from a series of key stakeholders.
- iii. The first phase of the Review has now been completed, and the Task and Finish Group has considered the information which was gathered through the pre-consultation. A summary of the outcomes of the pre-consultation phase, including data about the number of responses, can be found at **Annex B**.

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

‘The following are the recommendations of the Procedures Task and Finish Group, made after considering the results of the consultation on the current Criteria and Procedures. We do not recommend radical changes to the Procedures, but do consider that they can be streamlined and made more effective and efficient to operate.

- Enable and promote a higher level of pre-application contact with applicants, including the opportunity to discuss the viability of potential applications.
- Aid providers to identify, present and cross-reference the evidence that needs to be submitted with applications, renewals and annual reports, for instance through the use of a pro-forma or template, and preferably via a simple electronic portal. The aim of this is to make the ARB’s requirements clearer, to reduce the volume of what is submitted, and to make it easier for reviewers to find the relevant information. It should not dictate the format of the evidence that needs to be provided.
- Review the initial application process so that proportionate measures are applied according to the level of risk represented by each applicant. This might take the form of a standard common requirement, plus additional information and evidence that is required for instance if the applicant is submitting its first architecture course, or lacks a track record of quality-assured higher education provision.
- Clarify the different purposes and aims of annual monitoring and renewal of prescription, ensuring that they complement rather than duplicate each other; and revise the relevant procedures accordingly, with the aim of streamlining them to remove duplication.
- Move to a standard renewal cycle of five to six years, with some flexibility so that timing can be negotiated with individual institutions for instance to co-ordinate with internal procedures. This must however be subject to the ability

to require a shorter timescale where this is judged necessary, for instance where the course or institution is assessed as posing a higher level of risk.

- Provide indicative guidance on course changes that (a) need to be notified but can be implemented immediately, (b) need permission before they can be made, and (c) require a reapplication for prescription.
- Investigate whether there are ways of improving student involvement in the process, consistent with the remit of ARB as a professional regulatory body, and make recommendations as relevant.
- Review the Procedures document in accordance with the decisions made about the above matters and to improve its structure and clarity.

The Group has had sight of the draft recommendations of the Criteria Task & Finish Group, which is undertaking the business as usual review of the Criteria at Parts 1 2 and 3 and in view of these considers that the recommendations set out here are appropriate and proportional. The Group expects to work closely with the Criteria group in future to ensure that the Procedures remain adequate for ensuring that the Criteria are followed.'

- iv. The Board is asked to consider the above recommendations and agree whether there are any other key areas that it wishes to be reviewed.

The Staff suggest that the Group should additionally explore the following areas:

- ARB's objectives for renewal and first time applications for renewal;
- the role and membership of the Prescription Committee;
- the role and value of external examiners' reports within the process; and
- whether there should be a separate process for reviewing Part 3 qualifications.

Alongside the revisions to the Procedures, the ARB staff will need to develop and make some operational changes, so that the process can continue to run smoothly.

- v. DCLG position

It will be important for ARB to brief DCLG on the proposed direction of travel, so as to allow the Department to raise any concerns it has before the Review proceeds. DCLG will need to understand the impact of ARB undertaking two reviews in succession, and be able to consider whether the proposed actions have any negative impact on the UK's position in relation to its exit from the European Union, or negotiating position with countries from the rest of the world.

- vi. Subject to the Board's agreement with the Task and Finish Group's suggested

direction of travel and decision to include any additional areas for exploration/adjustment, the Board is asked to note that the Group will be reconvened following the Board meeting and will continue with the work of reviewing the Procedures document. As noted within the Group's recommendations, there will be an overlap with the discussions and outcomes from the Criteria Task and Finish Group.

6. Resource implications

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

7. Risk Implications

We have prepared a bespoke risk register for this review which was presented to the Audit Committee in October 2017. The Task and Finish Group has also been made aware of the risk register. We will continue to identify any new or changing risks as the review progresses.

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

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

The Board will need to ensure that it properly consults all relevant stakeholders in accordance with its consultation policy. All stakeholders should be given the opportunity to contribute to and comment on the development of any revised procedures before the Task and Finish Group commences its work as well as on the proposals the Board agrees for consultation. Failure to do so could result in reputational damage and a lack of buy-in by

key stakeholders. All stakeholders have had the opportunity to contribute to the pre-consultation process, which was widely publicised and open from early September until early October. A full consultation exercise is planned once any revised document has been reviewed by the Board in Spring 2018. [Note: feedback gathered which is more appropriate for the Routes to Registration review will be held on file until the Board progresses with this review.]

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

8. Communication

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

We developed a communications plan for Phase 1 of the Review and are in the process of updating this for the next phase. The plan outlines how communications with stakeholders will be managed throughout the Review. The Task and Finish Group will also be made aware of the updated communications plan and be invited to assist in its development.

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

9. Equality and Diversity Implications

Equality and diversity implications are being taken into account as part of the review and Equality Impact Assessments (EIA) were prepared in relation to the existing Procedures. The outcomes of the EIA were provided to the Task and Finish Group at its initial meeting.

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

10. Further Actions

Subject to the Board's agreement to the recommendations above:

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

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

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

ARB Procedures Review

Objectives

Any revised or updated procedures for the prescription of qualifications should enable the Board to:

- Continue to discharge its functions under Section 4(1) a and 4(1) b of the Architects Act 1997;
- Ensure that its processes for prescribing qualifications, renew prescription of existing qualifications, dealing with annual monitoring submissions and course and title changes continue to be clear, transparent, proportionate, efficient and effective;
- Ensure that its processes support the admission of competent individuals to the Register on completion of their studies and practical training experience; and
- Ensure that qualifications, and, where appropriate, experience it prescribes meet the requirements of the Mutual Recognition of Professional Qualifications Directive so that the UK's qualifications can continue to be listed under Annex V of the Directive as well as any additional requirements the Board may wish to set over and above this.

The Board noted and agreed that the review of the Procedures must be based on the Board's current requirements for entry to the Register which state that individuals must hold Part 1, Part 2 and Part 3 qualifications in order to enter the Register. It was noted that this element could not be reviewed until the Department has confirmed that the Board can progress a review of the UK routes to registration.

Stages of the review/timescales

Activity	Timescale
Executive to undertake a wide ranging pre-consultation exercise and gather information/evidence from ARB's stakeholders	August – October 2017
The Registrar, Head of Qualifications and Governance and ARB Chair to appoint and establish an ARB Task and Finish Group to undertake the review	August – October 2017
ARB's Task and Finish Group to	October – November 2017

undertake an initial analysis and review of information gathered from pre-consultation exercise and evidence gathering stage	
<p>ARB's Task and Finish Group/the executive to provide updates to the Board</p> <p>DCLG's views on the direction of travel to be presented to the Board</p> <p>The Board to take decisions regarding the direction of travel of the review</p>	23 November 2017
ARB's Task and Finish Group to develop revisions to the procedures	November 2017 – January 2018 (or April 2018 depending on developments relating to the criteria review)
Presentation of draft revised Procedures to the Board; if approved, issue for consultation	February (or May 2018 depending on developments relating to the criteria review)
Consultation period	Late February 2018 – Late May 2018 (or late May 2018 – late August 2018 depending on developments relating to the criteria review)
<p>Consideration of consultation feedback by ARB's Task and Finish Group</p> <p>Formulation of recommendations to the Board</p>	June 2018 (or late August/early September 2018 depending on developments relating to the criteria review)

<p>Consideration of consultation feedback and ARB's Task and Finish Group's recommendations by the Board</p> <p>Approval of revised procedures by the Board</p> <p>The executive to communicate the details of the transitional implementation phase of revised criteria to stakeholders</p>	<p>July 2018 (or September 2018 depending on developments relating to the criteria review)</p>
<p>Procedures become effective</p>	<p>September 2019</p>

Item 9 (Procedures Review) - ANNEX B

ARB Review of the Criteria and Procedures for Prescription

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

16th November 2017

(final version)

Stan Lester

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Summary

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

The Criteria

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

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

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

The Procedures

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

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

Equality matters

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

Introduction

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

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

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

Table 1: consultation participants by role

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

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

² Including some who have some training in architecture

³ These are group rather than individual responses, excluding the ARB Prescription Committee.

Table 2: consultation participants by location

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

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

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

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

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

1. The Criteria

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

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

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

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

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

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

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

Differentiating Parts 1 and 2

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

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

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

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

The content at Parts 1 and 2

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

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

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

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

Part 3

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

Additional comments

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

2. The Procedures

The initial prescription process

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

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

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

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

Annual monitoring and renewal

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

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

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

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

Course and title changes

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

3. Equality matters

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

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