

Board Paper

for Open session

Subject: Education consultation report 2023

To agree the publication of an analysis report on the consultation ARB carried out on its proposals to reform the initial education and training of architects

Board meeting:

6 September 2023

Agenda item:

7a

Action:

- For noting
- For discussion
- For decision

Purpose

This paper asks the Board to approve the publication of a report detailing the full analysis of ARB's education reforms consultation, including the Board's conclusions and next steps.

Recommendations

The Board is asked to approve the publication of a report on the consultation ARB carried out on its proposals to reform the initial education and training of architects (from 8 February to 10 May 2023), including the results and key findings, Board's conclusions, and next steps.

Annexes

Annexe A - Tomorrow's Architects: Analysis report on ARB's consultation on education and training reforms, 8 February to 10 May 2023.

Author/Key Contact

Rebecca Roberts-Hughes, Director of Policy and Communications, rebeccar@arb.org.uk and Hugh Simpson, Chief Executive and Registrar, hughs@arb.org.uk

1. Open Session

- 1.1. This decision will be made in the open session of the Board meeting.
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2. Background and Key points

Background

- 2.1. When ARB published its Corporate Strategy 2022-26, we committed to a fundamental overhaul of the initial education and training of architects.
 - 2.2. The vision was that by 2026, the initial education and training of architects will better reflect the knowledge, skills, experience and behaviours they need in areas such as climate change, safety and emerging technologies. Also, that the structure of education and training will be reviewed to improve diversity and access to the profession.
 - 2.3. The Board made the following specific commitments:

 - Set new standards for institutions to underpin new learning outcomes and provide much greater clarity about how to meet our requirements, including our expectations around equality, diversity and inclusion.
 - Overhaul our prescription processes and introduce new quality assurance mechanisms which are proportionate, assure the public and support institutions to deliver high quality education and training.
 - Engage the sector to reform the structure of education and training, moving away from the current complexity which inhibits diversity, stifles innovation and erects barriers, particularly to aspiring architects from other fields and architects who qualified outside the UK.

 - 2.4. The underpinning evidence for reform and the analysis behind the key strands of ARBs proposals were set out in previous Board Papers (December 2022) as well as the Discussion Paper, Modernising Initial Education and Training from 2021.
 - 2.5. What we heard consistently was that while there were many strong elements within the current model, urgent reform was needed. The proposals within our 2022 consultation set out the Board's vision for how improvement can be made by:
 - Publishing a new modern set of competency outcomes which reflect the threshold requirements for registration with ARB following initial education and training
 - Introducing a new accreditation methodology which would reduce bureaucracy significantly on schools by focusing regulatory quality assurance at the Level 7 (11 in Scotland) and also introducing a new risk based approach to accreditation underpinned by new standards for providers
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Our engagement and consultation approach

- 2.6. Set out below in this paper is an overview of the feedback from the consultation including the conclusions and recommendations. Our approach to the analysis of the feedback has been to consider in detail both major themes within the feedback, and to test and the key themes and suggestions raised by respondents against the Board's vision and commitments.
 - 2.7. What we have concluded is that a number of our proposals should proceed as initially described (with various drafting amendments), but in other areas the feedback and challenge was compelling, and we need to think again.
 - 2.8. In one specific area, professional practical experience, we have been persuaded by the feedback that significant further work is required by ARB. Recommendations on how to do this are set out elsewhere on the Board's agenda.
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ARB's consultation on proposals to reform education and training

- 2.9. Between from 8 February to 10 May 2023 ARB carried out a public consultation on the Board's proposals to reform the way in which architects are trained and educated.
- 2.10. The proposed changes aimed to enable learning providers to innovate and develop new routes to registration by moving to a new framework in which our regulatory focus is on outcomes: on what an individual must know, what they must be able to do, and how they must behave, rather how and what they are taught. The Board intended the changes to remove regulatory burdens, by no longer accrediting undergraduate degrees, and enabling the introduction of new entry points and a range of pathways for future architects.
- 2.11. The Board's proposals also included new learning outcomes, or competencies, for accredited qualifications; stronger and clearer standards for learning providers delivering accredited qualifications and Accreditation Rules to underpin the new approach to quality assurance; transition arrangements to the new regulatory approach; and, lastly, the related changes to our General Rules. We also took the opportunity to consult on other necessary changes to the General Rules.
- 2.12. ARB published all these proposals in full, along with graphically designed documents detailing the competencies and the standards for learning providers. In accordance with statutory requirements, we consulted for a period of three months, and promoted the consultation widely to architects, learning providers, relevant stakeholders including representative organisations, and to anyone who follows our social media accounts. Throughout the consultation period we held meetings with stakeholders to explain our proposals, answer questions, and hear their views.

Consultation report

- 2.13. The consultation closed in May 2023 and received 672 unique responses. ARB has now analysed each of these and, after presenting initial findings to the Board in June 2023, has produced a full analysis report of the consultation (Annexe A). The draft report includes the conclusions we believe the Board has reached in its consideration of the consultation findings, and the next steps ARB will take as a result.
- 2.14. Whilst some aspects of the Board's proposals received strong support, others received mixed feedback with some compelling challenges raised by respondents. In discussing the findings our recommendation is that some proposals can be implemented straight away while others require further development or, in some cases, revision to address the concerns and ideas raised through the consultation.

The regulatory framework

- 2.15. Respondents had mixed views about the proposed regulatory framework, with similar proportions agreeing and disagreeing that it would meet our aim and help to achieve our vision. Students were more likely to agree, as were architectural designers and consultants, but academics were less likely. More respondents agreed that our proposals would improve access than disagreed, with groups currently underrepresented in the profession slightly more likely to agree.
- 2.16. There was little alignment in the concerns people expressed when explaining why they did not agree with the proposed regulatory framework. Some wanted to retain the regulatory requirement for an undergraduate degree; some wanted nothing to change; and some expressed concern that our changes could reduce standards – often in relation to our proposals on practical professional experience (discussed below). Another concern raised by respondents was funding, and whether our changes would have adverse financial impacts on students and on learning providers.
- 2.17. The report concludes that the Board will make some important modifications to the regulatory framework before introducing it. We will issue guidance clarifying that to access an accredited qualification, students will need to have appropriate undergraduate qualifications or relevant work experience. We will also revisit our proposals for practical experience, as described below.
- 2.18. Our proposals should not have an adverse impact on the financial support made available to students. Discussions with UK and devolved governments have reassured us that our proposals will not change the funding status of students, but this is something we will keep under review.

Professional practical experience

- 2.19. The majority of respondents disagreed with our proposal to remove the minimum duration of professional practical experience (which is currently two years). We received a broad range of ideas and concerns about the role of practices in our proposals, and the impact our proposals would have on them. In their comments, respondents discussed the challenges of getting this right.
- 2.20. The report concludes that the Board will fundamentally revise proposals for professional practical experience. Although we remain committed to a more flexible approach to professional practical experience and what is required by ARB, we have learned through the consultation that removing the minimum duration will not address the problems that arise for those looking to gain the experience. We have heard of a risk of the unintended consequence of weakening the standards of the architects' profession. We recommend keeping the principles within the current requirements (and therefore retaining the two-year minimum) for the time being.
- 2.21. We will establish a Commission, with an independent Chair appointed and funded by ARB, to meet with architects, employers, students and learning providers to provide options and recommendations to ARB on how to improve fair and consistent access to quality practical experience, and the recommended new minimum requirements for relevant experience. We will appoint the Commission in the Autumn and ask it to present its report to the Board within twelve months.

Competency outcomes

- 2.22. The consultation revealed high levels of agreement for every competency. Whilst there were few common trends about what needed to be improved, key topics people expected to see more of were building technology, safety and sustainability. There were concerns raised by academics in some responses and through our engagement meetings about the language we propose to describe the different levels at which the competencies must be assessed. We also received mixed feedback from respondents about the number of competencies proposed (too many) alongside feedback that there were areas where additional competency outcomes should be included.
- 2.23. The report concludes that the competencies accurately describe the outcomes someone must demonstrate in order to join the Register of Architects. We will make some drafting amendments based on suggestions raised by respondents. We will make key topics that sit across the competency domains (such as building technology and construction, safety and sustainability) more visible. ARB's existing current guidance for learning providers on safety and sustainability will be retained, but we will provide clarity on its status and how it relates to the core competency outcomes.

Accreditation, including standards for providers and transition

- 2.24. More respondents agreed than disagreed with every standard, although roughly a third of respondents didn't express a view either way. Students were more likely to agree (than disagree) that the standards would create a better learning environment; academics were more likely to disagree. The most common view expressed about our transition arrangement was that we should be clearer and offer more detail about our plans. There were different opinions the optimum speed of transition.
- 2.25. The report concludes that the Board will implement its proposed changes to the accreditation of qualifications. We will proceed to finalise the proposed Standards for Providers, with some drafting changes based on detailed suggestions. We agree more guidance and advice is needed and we will produce a Handbook for Providers, containing guidance on how the Standards can be met.
- 2.26. We will be clear about how and why ARB Accreditation is a statutory necessity for public assurance and a requirement for professionals looking to qualify as architects, to help learning providers understand how it differs fundamentally in purpose from RIBA's Validation. We will publish a roadmap setting out the transition timeline and how it may impact different cohorts of students.
- 2.27. We will also establish an Accreditation Implementation Reference Group so that we can work collaboratively with the sector to transition to the new framework, taking feedback into account along the way to make sure the changes can be properly implemented, and that we are flexible in revising aspects of our timeline if necessary.

Publishing the report

- 2.28. If the Board agrees that the report accurately reflects its conclusions and the next steps ARB will take, the report will be published immediately after the Board meeting (the following day). If the Board requests changes to the report to better reflect its decisions, the report will be published later in the month, but we will still announce the decisions the Board made in the meeting immediately. Stakeholders are keen to know the outcome of the consultation as soon as possible, to understand what changes are coming and how they should prepare for them.
- 2.29. Once the report is published, we will share it and a summary of the conclusions and next steps with all stakeholders, including registrants, learning providers, and all consultation respondents who agreed we could contact them.
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3. Resource Implications

- 3.1. There are no resource implications attached to the publication of this consultation report. Some of the decisions the Board makes as a result of the consultation will have resource implications, and these are detailed in the relevant cover papers.
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4. Risk Implications

- 4.1. Consultation is carried out to ensure that external stakeholders have an opportunity to reflect on our policy proposals, and raise concerns or ideas that we can consider in order to strengthen our proposals. Some of the changes we make to our education proposals are introduced to mitigate risks identified through the consultation. The modifications we are recommending to the proposals are detailed throughout the consultation report, in particular in the conclusion section to each chapter.
 - 4.2. It is likely that some consultation respondents do not agree with the way in which we've responded to their particular concerns. Given the range of views expressed by respondents, there was no single course of action ARB could have taken that would be welcomed by every stakeholder group.
 - 4.3. A number of respondents raised concerns about issues which are not matters for ARB, such as the funding of Higher Education in general and funding of architecture in particular. While ARB needs to be assured that our statutory requirements are deliverable, these matters sit outside our remit and are a matter for the sector and the government.
 - 4.4. Our analysis of the feedback also demonstrates that in some areas our proposals were not well understood and we need to continue to engage the sector as we move to implementation of proposals.
 - 4.5. Despite these risks, it remains our view that the consultation analysis should be published in full. Anyone interested should be able to gain a full understanding of the consultee views and the conclusions the Board has reached as a result, and this report shares all that information with clarity and in detail.
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5. Equality and Diversity implications

- 5.1. The consultation report includes valuable evidence to help us understand whether our proposed changes will have a positive impact on equality, diversity and inclusion in the profession.

- 5.2. The gateway questions to the consultation included questions to help us monitor who is responding to the consultation. We use the data gained through these questions to understand whether people with different characteristics, or who are part of different stakeholder groups, are in agreement with our proposals, and with one another. For example, when we asked respondents whether they agree that our proposals will improve access to the profession, we found that people from certain groups currently underrepresented in the profession were more likely to agree that the changes will help.
 - 5.3. It is appropriate that we publish this evidence base so that stakeholders can understand the Board's decisions.
 - 5.4. The EDI implications of each specific element of our reform proposals are set out separately in the respective Board papers.
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6. Recommendations

- 6.1. The Board is asked to approve the publication of a report on the consultation ARB carried out on its proposals to reform the initial education and training of architects (from 8 February to 10 May 2023), including the results and key findings, Board's conclusions, and next steps.