



Architects
Registration
Board

Consultation on the Architects Code of Conduct and Practice

Analysis report

September – December 2024

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Summary

ARB's Code of Conduct and Practice

As the statutory regulator of the architects' profession, one of ARB's functions is to set the standards of conduct and practice the profession must meet and take action when any architect falls below the required standards of conduct or competence. We do this through setting a Code of Conduct and Practice, and we have statutory obligations to keep the Code under review.

The last substantial revision to the current Code was in 2011. Since then, the Grenfell Tower disaster and ensuing building safety crisis, the Climate Emergency and changing societal attitudes towards equality, diversity and inclusion have all transformed the environment in which architects practise.

This consultation

In September 2024 we published a new draft Code for consultation. The new Code is designed to act as a positive statement of what professionalism and ethics mean to architects. It aims to explain to the public, clients, and those who work with architects the behaviours and high standards they should expect from the profession. It was drafted using research on public expectations as to how architects should behave and act, and following engagement with architects and other professionals in the built environment.

It is based on six outcomes-focussed Standards, each of which is underlined with example behaviours. The Standards were intended to be underpinned by guidance, and a list of proposed guidance topics was published as part of the consultation.

The results and our conclusions

The consultation ran from 12 September 2024 and closed on 12 December 2024. We received 441 unique responses. Most (393, 89%) were from registered architects, including 42 who were also academics. Respondents represented a range of roles, regions and levels of experience as an architect.

The Standards and guidance topics proposed all received high levels of support. This was the same across all the most common respondent groups (architects, academics and students). As a result, we are confident that these topics are supported by the profession.

We identified seven recurring themes in our analysis of written comments. The most common were:

- That the Code was too weak or lenient in its requirements (91 respondents, 21%)
- That the Code was too demanding in its requirements (68 respondents, 15%)
- Suggestions that the structure or format was not suitable (66 responses, 15%)

The other topics raised (each by less than 15% of respondents) were:

- Requests for clarification on the definition of a phrase or word in the Code;
- Requests for clarification on the Code's intent, status or implementation;
- Suggestions which were based on a misunderstanding of the purpose of the Code or ARB's role;

- Concerns that elements of the Code are unachievable or technically difficult, which included comments on challenges arising from practice size or the role of an architect in the construction sector.

Next steps

We learned through the consultation that there is strong agreement for all our proposed Standards and guidance topics. Many of the comments and sentiments conflict with one another – a key example being that the two most commonly raised opinions were in direct conflict (that the Code is too lenient, and too demanding).

On the basis of the strong agreement shown by respondents, we intend to proceed with the proposed Standards and guidance areas, with some language changes on the basis of useful drafting suggestions from respondents to help provide clarity.

When we publish and communicate the final Code, we will explain ARB's role and the purpose of the Code. We will also use this as an opportunity to help address misunderstanding about ARB's role or any suggested topics that we believe are better dealt with elsewhere or by other organisations.

We intend to produce and consult on all guidance documents on a rolling basis throughout 2025. As an indicative schedule, we hope to publish the documents for consultation in the following order:

Spring 2025

- Dealing with complaints and disputes
- Professional indemnity insurance
- Terms of engagement

Autumn 2025

- Building safety
- Financial conduct
- Managing conflicts of interest
- Sustainability

Winter 2025-6

- Equality, diversity and inclusion
- Leadership
- Mentoring
- Raising concerns

Any stakeholders who would like to be kept informed of – or help to shape – the development of any of these guidance documents can contact ARB at communications@arb.org.uk.

Introduction

ARB's role

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

This consultation and our proposals

- 1.3** Architects play a vital role in shaping the places where we live and work. The public, our communities and clients expect that architects will deliver buildings and spaces that are safe and sustainable and carry out their work ethically and with integrity.
- 1.4** As the statutory regulator for architects, ARB has a legal requirement to publish a Code of Conduct and Practice (the Architects Code) which sets out the standards the profession must uphold. The Architects' Code is fundamental for all architects as it describes the behaviours that underpin safe and ethical practice. Architects are expected to be guided in their professional conduct by the "spirit of the Code" as well as adhere to any express terms.
- 1.5** The last substantial revision to the Code was in 2011 and most recent edition of the Code was published in 2017. We are now seeking to revise and update it so that it continues to be fit for purpose and so that it responds to specific challenges faced by architects today.
- 1.6** This proposed revision is intended to address recent developments in building safety, environmental sustainability and inclusivity to ensure that the Code continues to be fit for practice.
- 1.7** The new Code is designed to act as a positive statement of what professionalism and ethics mean to architects. It aims to explain to the public, clients, and those who work with architects the behaviours and high standards they should expect from the profession. It was drafted



using [published research on public expectations as to how architects should behave and act](#), and following [engagement with architects and other professionals in the built environment](#).

- 1.8 The draft we published for consultation was based on six Standards, each underpinned by explanatory text and supported by examples of the behaviours that ARB would expect to see from an architect meeting that Standard. The six Standards were:



- 1.9 The consultation also included a proposed suite of guidance that would support the Code and give advice as to how architects can meet the Standards in specific situations and contexts. The proposed list of guidance was:

Professional indemnity insurance	Guidance on the steps architects need to take to ensure their liabilities are covered by adequate and appropriate insurance. Guidance on this topic already exists and will be reviewed.
Dealing with complaints and disputes	Guidance on how architects should deal with complaints and disputes about their professional work. Guidance on this topic already exists and will be reviewed.
Financial conduct	Guidance on the standards architects should meet when dealing with professional or business finances. This would be a new guidance document that we're proposing to introduce.
Sustainability	Guidance on how architects are expected to conduct themselves in respect of sustainability. Guidance on this topic already exists and will be reviewed.
Terms of engagement	Guidance on the contractual information architects should provide. This would be a new guidance document that we're proposing to introduce.
Raising concerns	Guidance on how architects can whistleblow or raise concerns about other individuals or work. This would be a new guidance document that we're proposing to introduce.
Building safety	Guidance on how architects should approach designing buildings which are safe for others to use. Guidance on this topic already exists and will be reviewed.

Equality, diversity and inclusion	The approach architects should take to creating a culture that supports equality, diversity and inclusion within the architecture and built environment sector. This would be a new guidance document that we're proposing to introduce.
Managing conflicts of interest	Guidance on how to recognise and manage conflicts of interest. This would be a new guidance document that we're proposing to introduce.
Mentoring	Guidance for those with the responsibility for mentoring and supporting early career professionals. This would be a new guidance document that we're proposing to introduce.
Leadership	Guidance for those architects who have the control and management of a practice, including the responsibility to supervise others. This would be a new guidance document that we're proposing to introduce.

How we analysed responses

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

Question 12: To what extent do you agree with each of the standards?

Multiple choice on each separate Standard, with optional written response

Question 13: We are proposing to produce guidance to underpin the standards. We are proposing guidance on the following topics. To what extent do you agree with each proposed guidance document?

Multiple choice on each separate guidance topic, with optional written response

Question 14: Is there anything missing from either the draft Code or the proposed guidance?

Optional written response

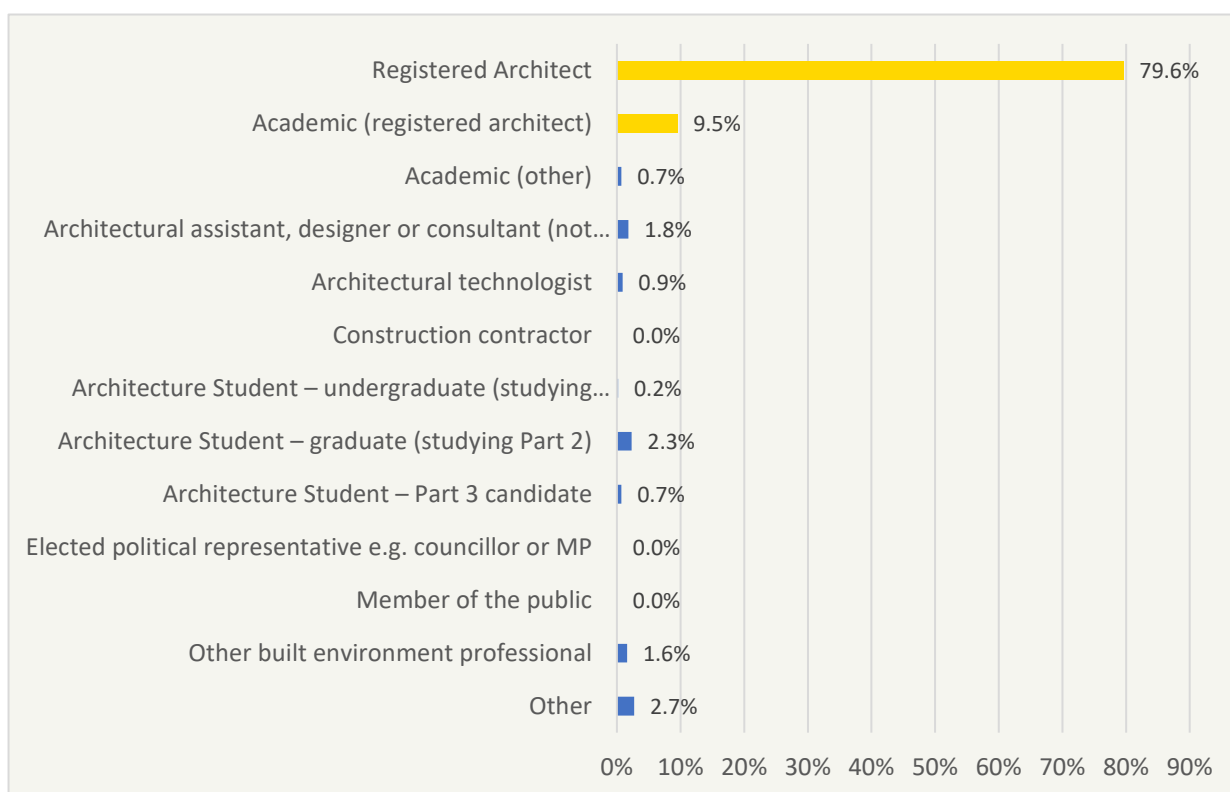
Question 15: Is there any further feedback you'd like to share with us about the proposed new Code of Conduct and Practice?

Optional written response

Who responded

- 2.1** The consultation was open between 12 September to 12 December 2024. We received 441 unique responses to the consultation. Respondents were asked to identify themselves across categories including demographic information and their type of work or size of practice. Most responses (393, 89%) were from registered architects, including 42 respondents (10%) who were also academics.
- 2.2** There were a further 22 respondents (5%) who were either students at different stages, or architectural assistants, designers or consultants (not Part 3 qualified). There were also 26 (6%) other types of respondents, which included other academics (3, 1%), architectural technologists (4, 1%), other built environment professionals (7, 2%) and others.

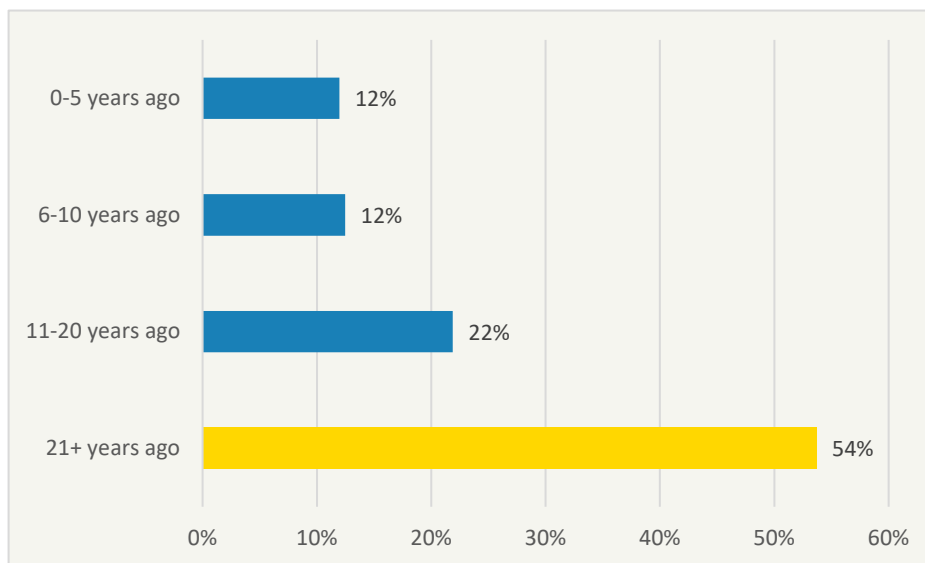
Figure 2.1: Respondents organised by role (% of responses)



Registered architects

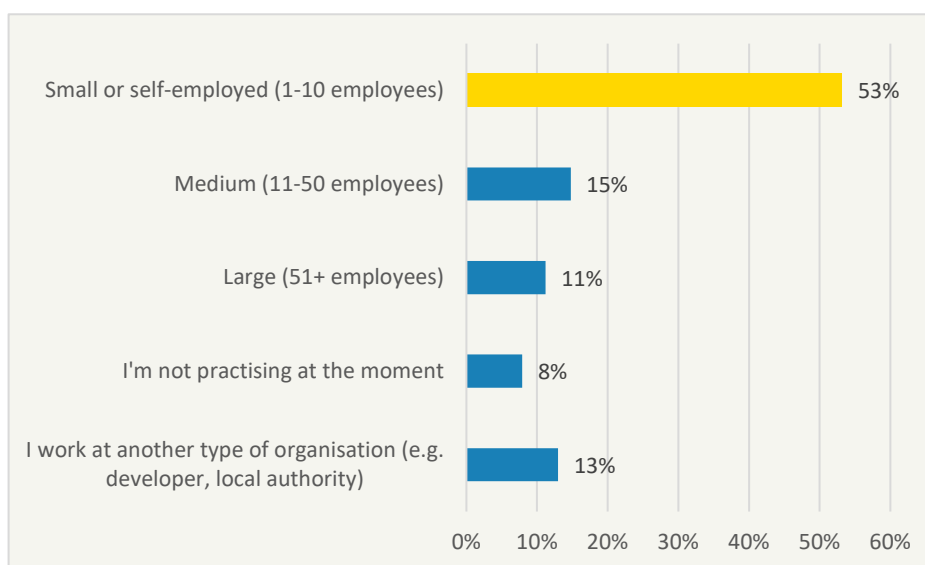
- 2.3** Registered architects (including those who were academics) were asked how long they had been qualified and the size of their practice. Most qualified 21 or more years ago (211, 54%). Responses from the remaining architects were spread across different times since becoming fully qualified. This included 47 (12%) who had recently qualified in the past 5 years.

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



2.4 Architect respondents worked at a range of practice sizes. They ranged from small or self-employed (209, 53%), medium (58, 15%) and large (44, 11%):

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



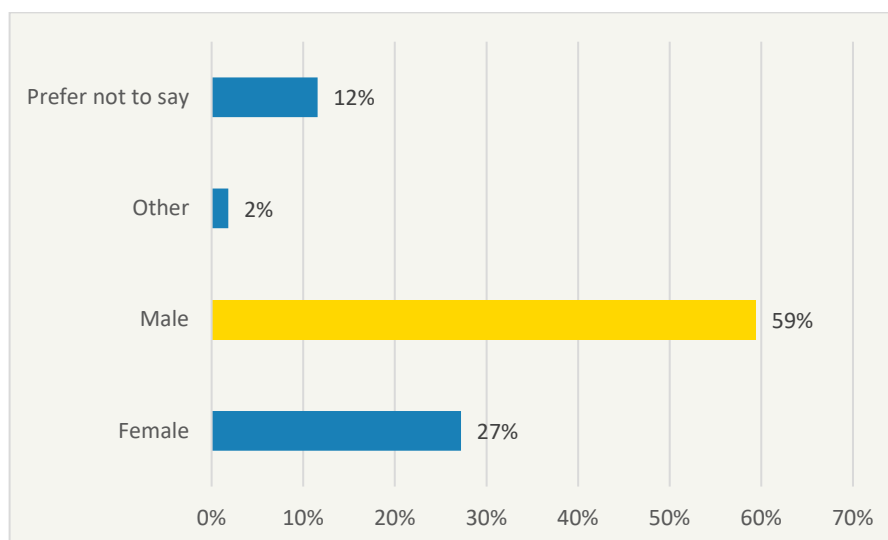
Organisations

2.5 There were 124 responses on behalf of organisations, which accounted for 28% of all responses to the consultation. The majority of these were architectural practices, many of which are small operations, often run by the individual respondent. Some of the organisations were universities, networks, and professional bodies. A full list of respondents who agreed to be identified is included in *Annex A*.

Gender

2.6 One hundred and twenty respondents (27%) identified as female and 262 as male (59%). Eight selected other (2%) and 51 (12%) preferred not to say. When excluding those who preferred not to say, the proportion of female respondents (31%) is slightly lower than the proportion on the Register (34%). The proportion of men responding (67%) is slightly higher than the proportion on the Register (65%).¹

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

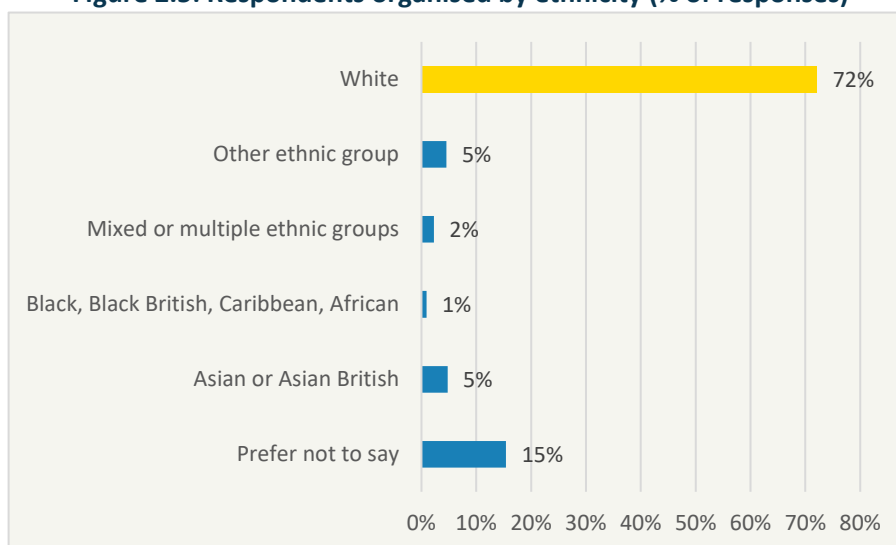


Ethnicity

2.7 Respondents were asked which ethnic group they belong to. Most respondents (318, 72%) were white. When excluding those who preferred not to say, most groups were in line with the Register. The proportion of 'Asian or Asian British' respondents (5%) was lower than the proportion on the Register (8%). The proportion of respondents from 'other ethnic groups' (5%) was higher than the proportion on the Register (1%).

¹ Register data is as of December 2024. Further information is available on ARB's website at <https://arb.org.uk/about-arb/equality-diversity/data>.

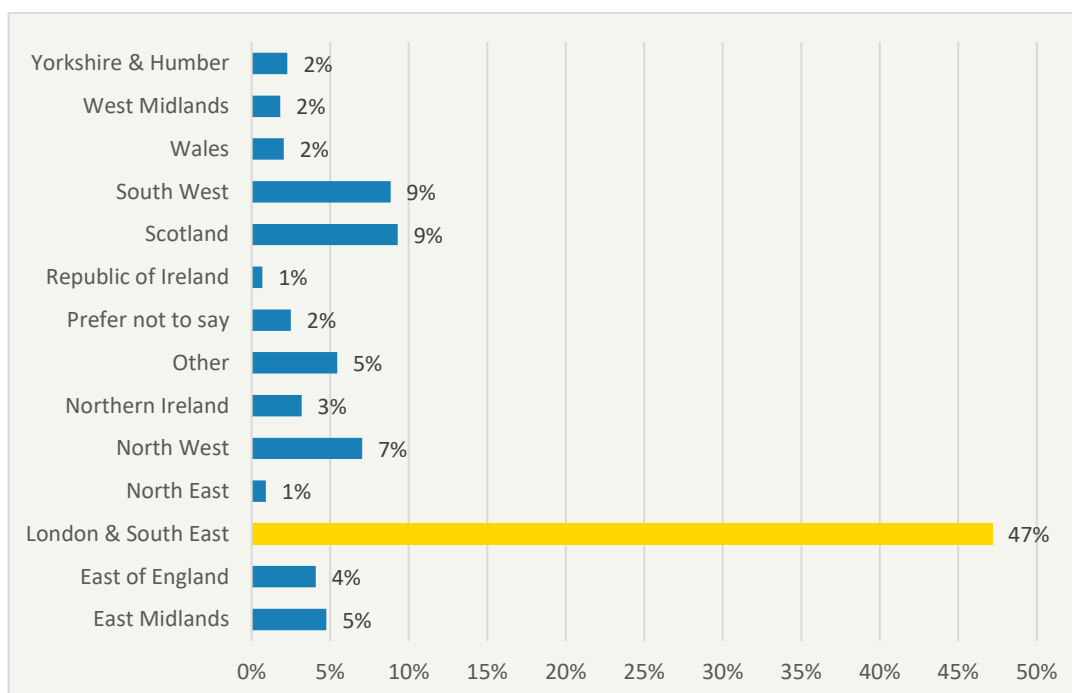
Figure 2.5: Respondents organised by ethnicity (% of responses)



Geographic spread of respondents

2.8 Respondents were asked to identify the nations or region that most closely described their place of residence. We received responses from each region, but the highest group were based in London and the South East (208, 47%), followed by Scotland (41, 9%) as the second highest group, and South West (39, 9%) as the third highest group (See Figure 2.6). This distribution broadly matches the Register of architects.² There were 24 respondents (5%) who selected other locations. These locations included the US, Australia, New Zealand, Hong Kong, and a range of European countries.

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



² Register data is as of December 2024. Further information is available on ARB's website at <https://arb.org.uk/about-arb/equality-diversity/data>.

Health

- 2.9** We asked respondents whether they have any physical or mental health conditions or illness lasting or expected to last 12 months or more. Nine percent of respondents (39) said they do, 345 (78%) did not and 57 (13%) preferred not to say.

Conclusions

The proposed Code will apply to all registered architects, and this group accounted for the majority of consultation respondents.

There are higher proportions of respondents reporting their gender as male, and this broadly reflects the makeup of the Register of Architects. All nations and regions are reflected across the respondents, with their distribution broadly in line with their proportionate composition on the Register.

We are therefore confident that views collected are sufficiently representative of the architects' profession, and that the feedback draws from across those currently in the profession, with the practising architects who responded being from different stages in their career and sizes of practices. This also meant we were also able to analyse differences in views between these groups.

Quantitative results

Views on each of the Standards

- 3.1** We asked respondents the extent to which they agree or disagree with each of the Standards within the draft Code. Respondents were able to provide a different answer for each Standard and expressed their opinion towards through a closed multiple-choice scale, by selecting *Strongly agree*, *Agree*, *Neither agree nor disagree*, *Disagree*, or *Strongly disagree*. Respondents were also able to use additional text to explain their response. These text responses have been analysed in the later section on qualitative results.
- 3.2** More respondents agreed than disagreed with each Standard, with ‘strongly agree’ being the most common response for each. This was the same across all major respondent groups (architects, academics and students at different stages).

“All of the standards stated create a strong foundation for architects to follow. They mention the key aspects when declaring oneself as an architect or a future architect and these standards should be maintained, upheld and further improved within the architectural profession and community. It sets a clear guideline in order for this field to grow and develop along with the people included within it.”

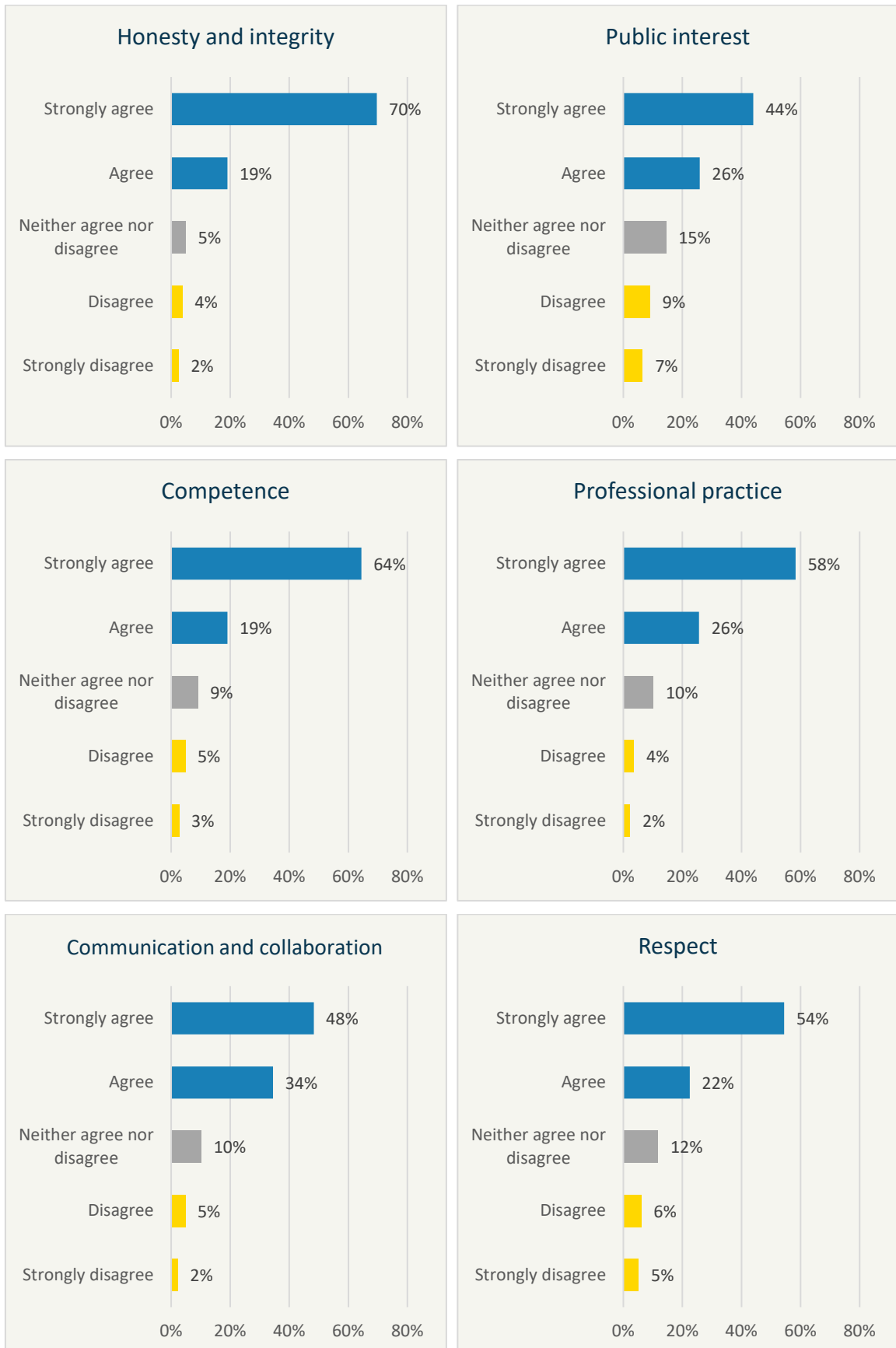
Architecture Student – Part 2, Northern Ireland

“This is an extremely well written and clear document which sets clear and meaningful standards [...]. It is particularly good to see the respect section and the requirement for politeness and consideration.”

Registered Architect, London & South East

- 3.3** ‘Honesty’ and ‘integrity’ received the highest level of combined agreement (89%), and ‘Public interest’ received the lowest with 70%, which is still a strong majority. ‘Public interest’ also had the highest level of disagreement, but with only 16% disagreeing or strongly disagreeing. Students and academics disagreed with this standard more than other groups (36% of student respondents disagreed and 22% of academics). Academics also disagreed with ‘Communication and collaboration’ more than other groups, with 20% doing so, compared to 7% of all respondents that selected either ‘strongly disagree’ or ‘disagree’.

Figure 3.1: To what extent do you agree with each of the Standards? (% of responses)



Views on each of the proposed guidance areas

3.4 We proposed to produce guidance to underpin the Standards. We listed the proposed topics and asked respondents the extent to which they agree or disagree with each. Respondents were able to provide a different answer for each topic and expressed their opinion towards through a closed multiple-choice scale, by selecting Strongly agree, Agree, Neither agree nor disagree, Disagree, or Strongly disagree. As with the Standards above, respondents were also able to use additional text to explain their response. These text responses have been analysed in the next section on qualitative results.

3.5 As with the Standards, more respondents agreed than disagreed with each proposed guidance area, across all major groups. ‘Strongly agree’ was again the most common response for each. ‘Building safety’ and ‘Dealing with complaints and disputes’ received the highest level of agreement (80% and 79%), with building safety having a noticeably higher level of strong agreement (59%).

“I strongly agree with the ARB’s proposal to produce these guidance documents, as they will provide architects with practical tools and frameworks to navigate the evolving demands of the profession.”

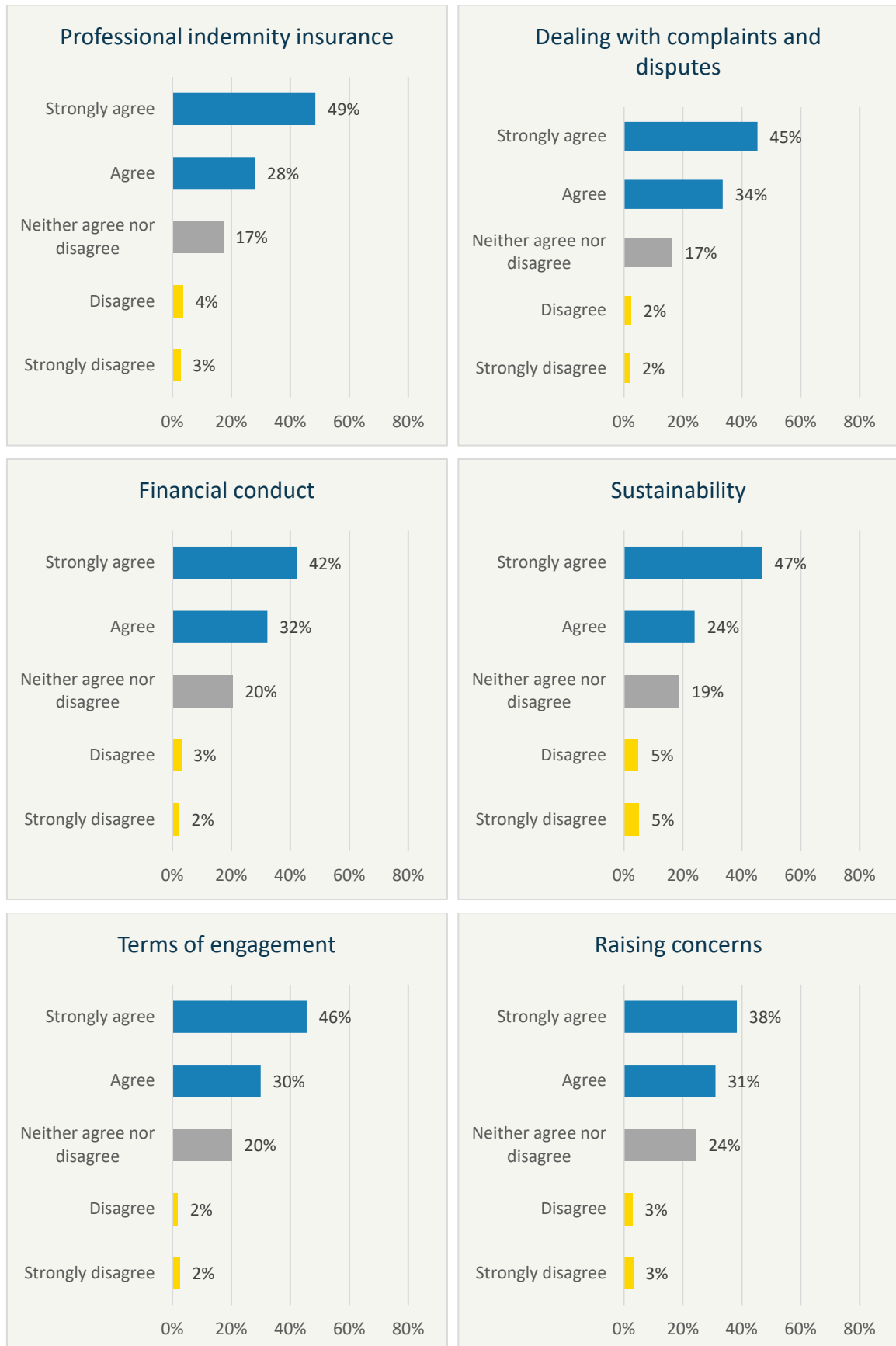
Registered Architect, North West

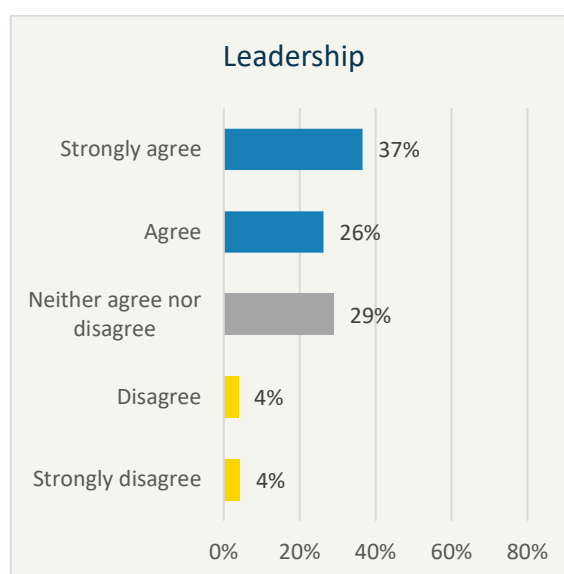
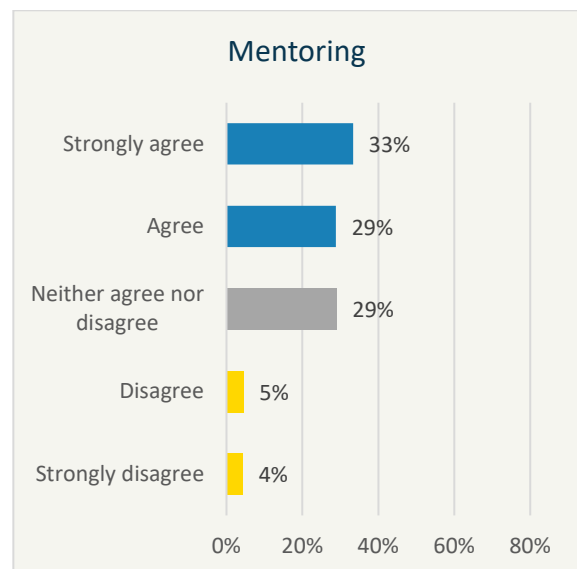
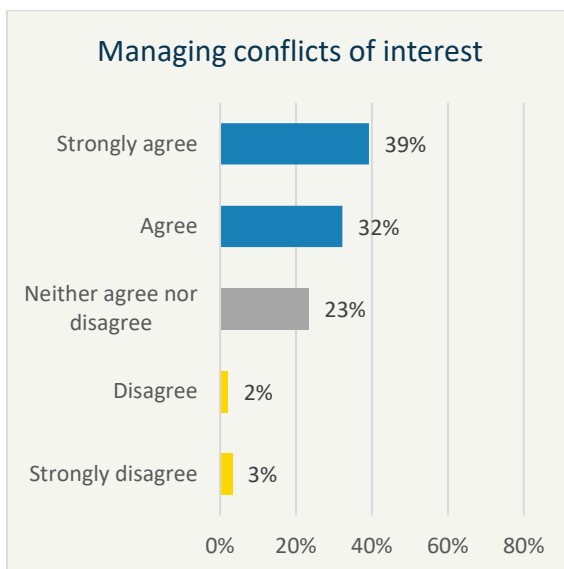
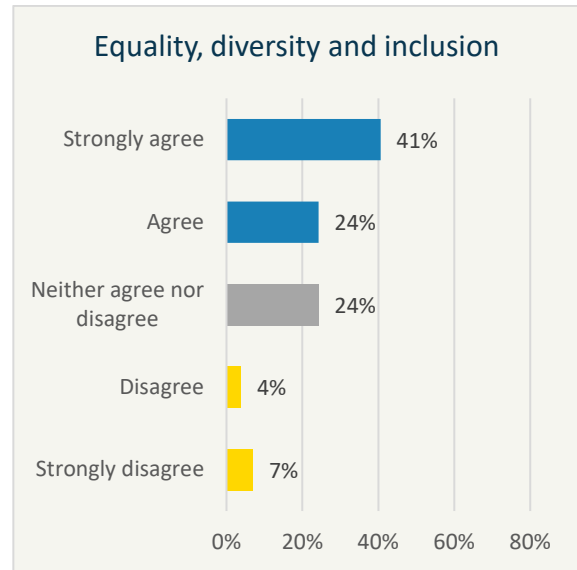
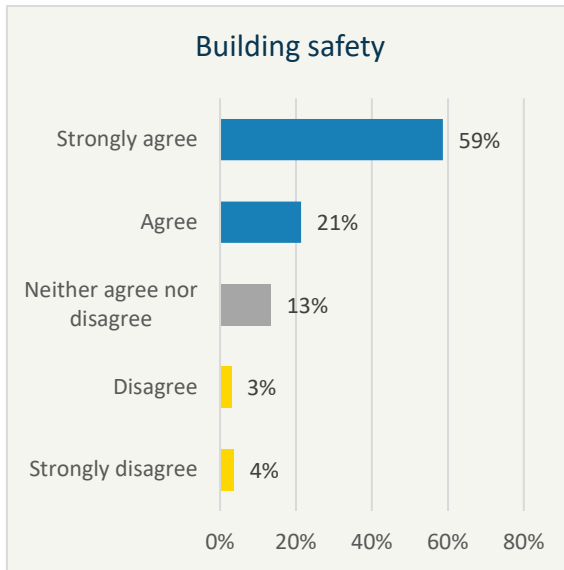
3.6 There were more neutral responses to this question, particularly on ‘Mentoring’ and ‘Leadership’ (both had 29% neither agreeing nor disagreeing). In their written responses, respondents often explained that answered this way because they wanted to have the final guidance available to consider (although our intent was to ask whether the guidance should be produced, and we do intend to consult on each guidance document).

“All guidance is helpful but without seeing a draft it is difficult to comment in detail. What is the status of this guidance (in relation to the code)? If these areas have been highlighted as important they could be the basis on which the code is drafted, to do otherwise is likely to be confusing.”

Academic (Registered Architect), London & South East

Figure 3.2: To what extent do you agree with each proposed guidance document? (% of responses)





Conclusions and next steps

The strong levels of support across each Standard and guidance area mean we are confident that these topics are appropriate. **We will therefore proceed with each of the proposed Standards and guidance areas.** We will publish an updated Code that considers the specific and helpful drafting suggestions we received from respondents, particularly those that will help us provide clarity.

Qualitative results

How we analysed comments from respondents

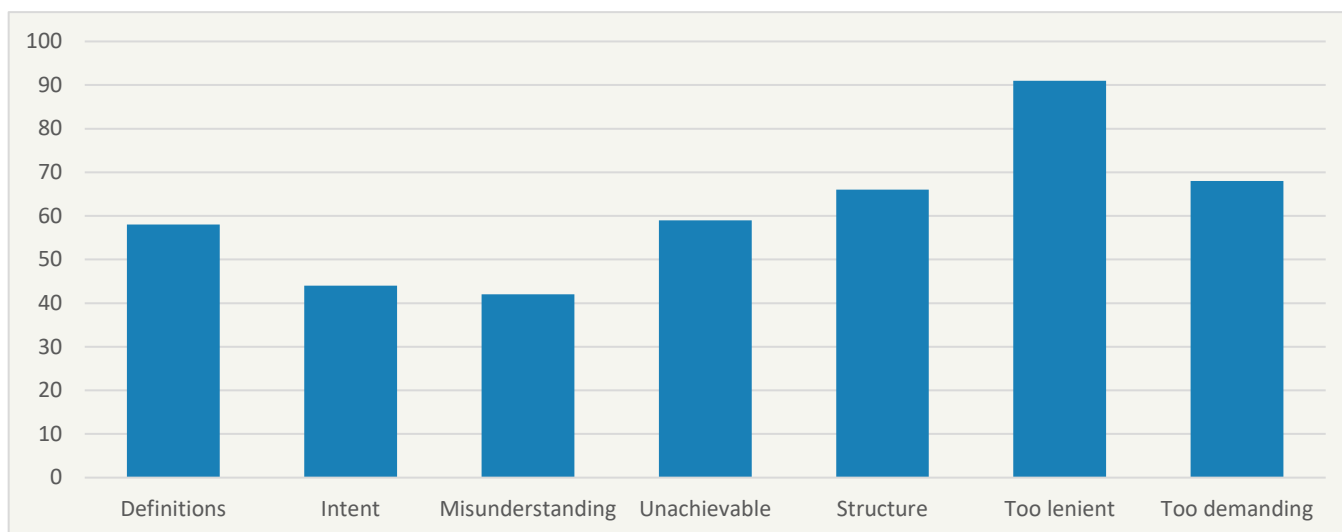
- 4.1** Our analysis identified developmental suggestions from respondents – meaning things they disagreed with or thought could be improved – and the recurring themes they expressed in their comments. This meant we could focus on identifying and then investigating the most common areas of concern and the suggestions for addressing them. Our coding framework is set out in *Annex C: Qualitative analysis coding framework*. A full breakdown of the consultation data can also be found in *Annex B: Consultation data*.
- 4.2** Our analysis of these recurring themes is below. For each theme, we have analysed both the numbers who raised each topic, along with comparing the demographics of those doing so to the overall proportions of the consultation respondents. We identify areas where these demographics differ from the overall consultation, meaning certain groups were more or less likely to raise each theme. Our analysis has also captured specific drafting suggestions made by respondents. There were too many of these to list in this report, so we have instead reviewed them to update the Code following this consultation.

Common themes

- 4.3** We identified seven recurring sentiments that respondents raised within their responses. These were:
- Seeking clarification on the **definition** of something.
 - Seeking clarification on the **intent**, status or implementation.
 - **Misunderstandings** about the purpose of the Code or ARB’s role.
 - Concerns that elements of the Code are **unachievable** or technically difficult. This included comments on challenges arising from practice size or the role of an architect in reality.
 - Views that the **structure** of how the Code is formatted or set out is not suitable.
 - That the Code was **‘too weak or lenient’** or, conversely, **‘too demanding’**, either in general or on specific topics: safety, sustainability or equality, diversity and inclusion.

Detailed analysis of each theme and the respondents raising it is examined below.

Figure 4.1: Common themes raised by respondents (number of respondents)



Definitions

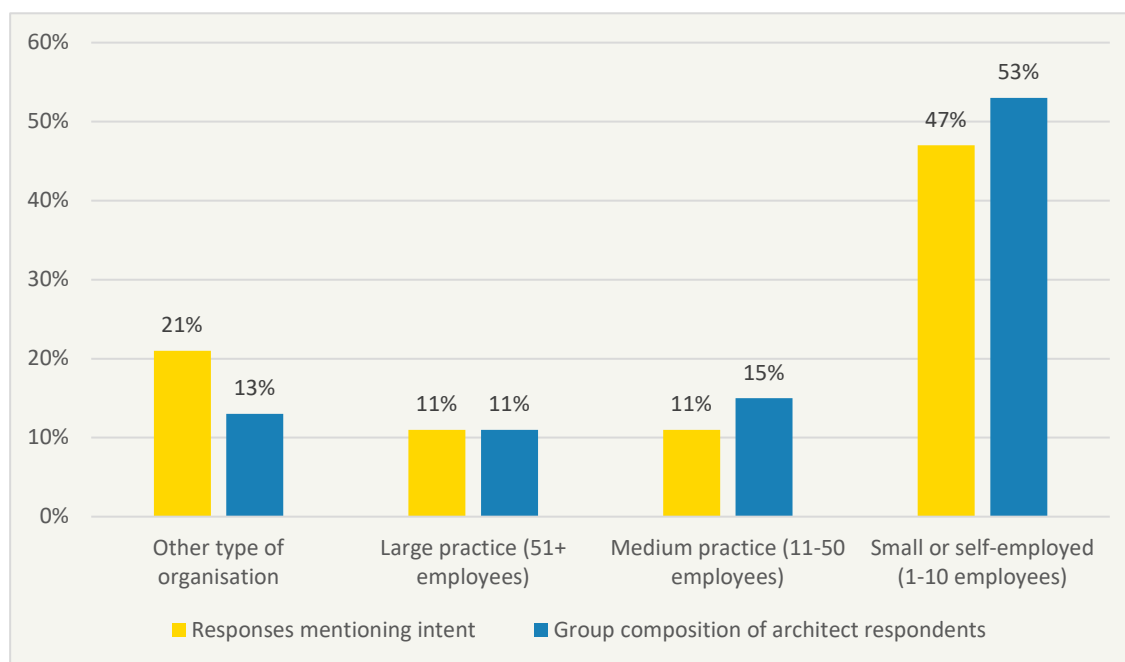
- 4.4** There were 58 respondents (13%) who requested further clarity on the definitions of the terms in the Code. Of these, 51 (88%) were registered architects, which included 12 (21%) who were also academics. The proportion of architect academics raising concerns on definitions (21%) was higher than the proportion of architect academic respondents in the consultation (9%).
- 4.5** Some of the terms raised by respondents included ‘respect,’ ‘inclusion,’ and ‘best endeavours.’ They suggested that definitions for these terms could vary under different circumstances, and that further detail would enable the terms to be understood clearly by those reading and abiding by the Code.

“To avoid ambiguity and to ensure the meaning of specific standards, guidance can be useful, but it does need to be carefully edited to ensure it will be fully understood.”
Registered Architect, South-West

Intent

- 4.6** Forty-four respondents (10%) raised concerns surrounding intent of the Code in their responses. They raised concerns on the applicability of the Code; for example, some respondents asked how the Code could be used in raising complaints and applied in disciplinary proceedings. These respondents were primarily registered architects, including those who were academics (38, 86%).

Figure 4.2: Registered architects raising concerns on intent by size of practice (% of registered architects)



4.7 Of the 44 respondents mentioning intent, 18 (41%) also raised concerns about definitions. These respondents highlighted similar terms within the draft Code, including ‘respect’ and ‘public interest.’

Misunderstanding

4.8 Forty-two respondents (9%) made comments that demonstrated some level of misunderstanding as to the purpose of the Code or ARB’s role. Most of these were Registered architects, including those who are academics (38, 90%).

4.9 Some of the suggestions that indicated misunderstanding included requests for the introduction of fee scales, protection of function, and suggestions on wages and other employment issues. Many of these are outside ARB’s legal remit or, in the case of fee scales, national competition law. Others are areas where it would be inappropriate for us to set standards, and we have noted these separately in the later suggestions section.

Unachievable

4.10 Fifty-nine respondents (13%) raised concerns that elements of the Code were unachievable. Some of these respondents suggested there were technical difficulties in achieving the Code for a range of reasons, including practice size, the architect’s role in a design project, and certain types of building contracts.

4.11 Of these respondents, 49 (83%) were registered architects (including academics). This was slightly lower than the overall proportion of respondents who were architects (89%), meaning that they were less likely to raise achievability as a concern. Over half of these respondents (29, 59%) also worked in either small practices or were self-employed, which was higher than the proportion of all architect respondents that worked in small practices or were self-employed (47%), meaning this group of architects were more likely to raise these concerns.

- 4.12** In explaining why the Code risked being unachievable, respondents raised concerns about costs for small practices and sole practitioners, including potential costs of CPD, and any costs associated with working with additional consultants to meet the new Standards related to sustainability.
- 4.13** The role of the architect in a design project was also raised. Several respondents highlighted different forms of contracts and procurement that meant architects, especially those in either junior positions or those working within a larger design team, had less control over the decisions made.

“[...] missing is the acknowledgement that the architect can find themselves in a position of little power within the decision hierarchy of a project. And that they can find themselves in situations that severely curtail their freedom to follow the Code of Conduct and Practice without having to upset their pay-master (particularly when novated (sub-contracted) to a contractor for the construction drawings).”
Registered Architect, London & South East

Structure

- 4.14** We received 66 responses (15%) mentioning the structure of the proposed Code. Respondents suggested the way the Code is formatted or set out is not suitable or could be improved. Sometimes the respondents set out how they would like future guidance documents to be structured. The majority of the respondents raising points about structure were registered architects, including those who are academics (49, 74%). This is slightly lower than the proportion of all respondents who were registered architects (89%), suggesting they were slightly less likely to raise this point.

“The language, tone, structure and format of the guidance documents should be consistent and easy to navigate. The guidance should be supportive, reflective and should use exemplars wherever possible.”
Academic (Registered Architect), Wales

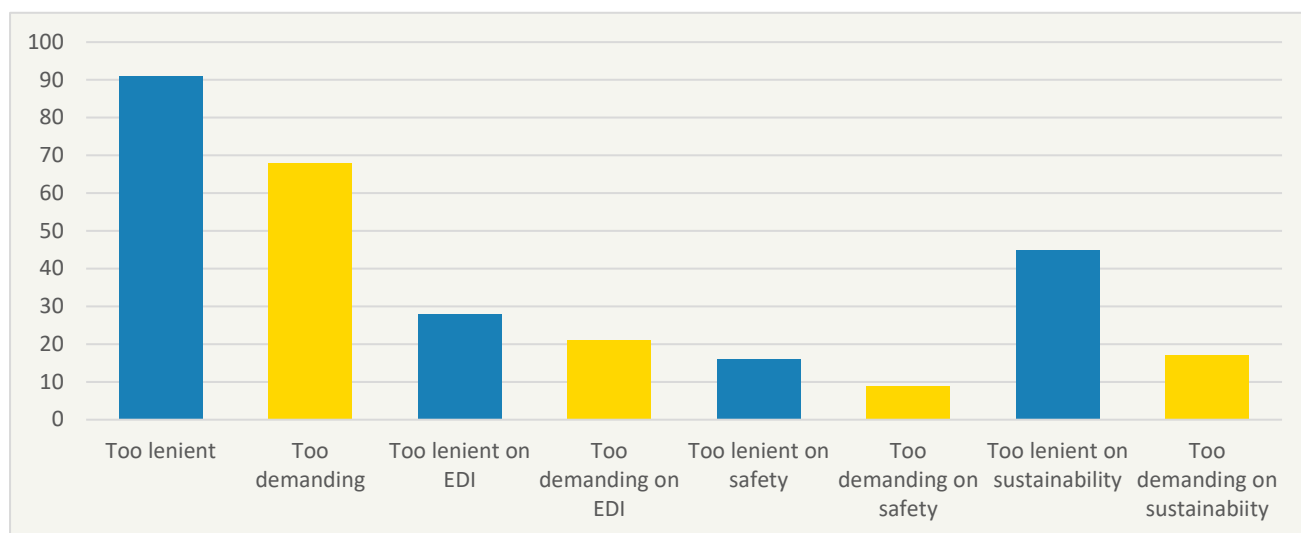
- 4.15** Of the 66 respondents who discussed the structure of the Code, roughly a third of them (23, 35%) did so alongside concerns about definitions. Commonly raised points were queries on how the terms would be enforced, the demarcation between the Standards and the guidance, and observable metrics in cases where architects could be at breach of the Code.

“We require a high standard to the profession but must be pragmatic and clear about its manifestation. Each of the mentioned standards are virtues in their own right but do not all lend itself to an observable, let alone measurable, metric.”
Other built environment professional, London & South East

The Code is too lenient... or too demanding

4.16 Two common themes were respondents telling us that the Code and guidance either was too demanding or too weak or lenient. These concerns were raised about the Code in general, and also on specific topics. Figure 4.1 below shows the numbers of respondents raising each. Overall, slightly more respondents suggested the Code was too weak or lenient.

Figure 4.1: Respondents suggesting the Code was too lenient or too demanding (number of respondents)



4.17 Within the groups of respondents concerned the strength and/or weakness of the Code, some raised a specific topic: for example, that the Code was too lenient on safety, or too demanding on sustainability. Other respondents only raised a general sentiment and did not make suggestions on a particular topic. For example, of the 91 respondents who said the Code was too weak, 16 said it was specifically too weak on safety: this is demonstrated in the graph at Figure 4.1 and discussed further below.

The Code is too lenient

4.18 The consultation received 91 responses (21%) that mentioned that elements of the proposed Code were too weak or lenient. These included comments about specific statements in the Code, proposed guidance, and the proposed standards.

4.19 Of the respondents who said the Code was too lenient, 68 (75%) were registered architects (including those who were academics). This is slightly lower than the proportion of all respondents who were registered architects (89%), suggesting they were slightly less likely to raise this point.

“My general comment is that the proposed code is much too weak on the fundamental issues of sustainability, building safety and equality, and these issues, as well as direct, enforceable requirements to address them must be embedded in the code of conduct itself and not in separate, unbinding guidance documents.”

Registered Architect, Scotland

- 4.20** Some respondents also recommended amendments that are outside our regulatory remit. Of the 91 respondents suggesting the Code was too lenient, 18 (20%) had also raised concerns that misunderstood the role of the ARB or the proposed Code.

The Code is too demanding

- 4.21** The consultation received 68 responses (15%) that suggested elements of the proposed Code were too demanding. Some of these comments also coincided with responses that wanted clarity on the intent of the Code (11, 16%). This meant that a small proportion of those who thought the Code went too far were also unsure of how it would be enforced.
- 4.22** Respondents raising this point sometimes suggested some topics were better covered by existing legislation, naming the Building Safety Act and the Equalities Act as examples. Some respondents suggested that some of the proposed guidance topics went beyond what they considered to be a regulator's remit, while some suggested that a multitude of guidance documents would create confusion amongst those reading and abiding by the Code.
- 4.23** Almost all these respondents (65, 96%) were registered architects, including those who were academics. Architect academics were less likely to say the Code was too demanding, accounting for 6% of respondents who said this, but 9% of all consultation respondents. Conversely, architects who were not academics were more likely to say the Code was too demanding, accounting for 90% of this respondent group but 80% of all consultation respondents.
- 4.24** Of respondents suggesting the Code was too demanding, only one was a registered architect that had qualified in the last five years, making this demographic less likely to raise this. Registered architects who had qualified between 6 to 10 years ago were slightly more likely to say this, accounting for 16% of respondents raising this suggestion but 25% of all consultation respondents. Registered architects having qualified between 11 to 20 years ago were more likely to suggest the Code was too demanding, accounting for 25% of respondents raising this topic but 20% of all architect respondents.
- 4.25** There was also variation in practice size: 44 (65%) respondents worked in either small practices or were self-employed, slightly higher than the overall proportion of all respondents working in small practices (53%), meaning they were more likely to raise concerns that the Code went too far. In contrast, only 2 (3%) respondents worked in larger practices compared to this group being 11% of all consultation respondents.

“Some of these are societal aspirations and are not necessarily important in the context of an individual architect undertaking their professional role. The standards should ensure that architects are able to do their job as architects, not necessarily impose other values or requirements that are outside of their professional capacity. We already have far more responsibility that we receive remuneration for.”

Registered Architect, West Midlands

Safety

- 4.26** Sixteen respondents (4%) raised concerns that the proposed Code was too lenient on safety. Respondents were primarily registered architects (10, 63%). Two of the respondents (13%) raising concerns were architectural technologists.
- 4.27** Nine respondents in the consultation (2%) commented that the proposed Code was too demanding on safety. Almost all of these (7, 78%) were registered architects. Some respondents suggested there were other regulations in place beyond the Code which were better suited for setting standards on safety. These respondents were mostly registered architects who worked in small practices or were self-employed (6, 67%), significantly higher than the proportion of all architect respondents working in small or sole practices (47%).

Sustainability

- 4.28** Forty-five respondents (10%) said the Code was too weak or too lenient on sustainability. These respondents were primarily registered architects and architects who were academics (31, 69%). Some of the respondents who suggested the Code be stricter on sustainability highlighted the role architects could play in ensuring design projects were better environmentally considered. Some suggested that while there were multiple professionals involved in designing buildings, architects were well positioned to oversee projects, meaning they were well placed to ensure sustainability was considered in their work.
- 4.29** Respondents suggesting the Code should be stronger on sustainability were more likely to be based in London and the South East; 26 respondents (58%), which is higher than the overall proportion of respondents from this region (47%).
- 4.30** There were 17 respondents (4%) who raised concerns that the proposed Code was too demanding on sustainability. These respondents were mostly registered architects including those who were academics (15, 88%). Most of the respondents raising this concern (12, 70%) were registered architects who worked in small practices or were self-employed. This was significantly higher than the proportion of architect respondents working in small or sole practices (47%), meaning they were more likely to raise concerns about too demanding an emphasis on sustainability.
- 4.31** Some respondents who raised this concern suggested that sustainability was better suited as a professional consideration, rather than a regulatory demand. Some described situations in which architects were not able to overturn client requirements, and were concerned cases like those may place architects in violation of the Code.

Equality, diversity and inclusion

- 4.32** A similar number of respondents expressed the view that requirements on equality, diversity and inclusion (EDI) were too demanding in the proposals (21 respondents, 5%), and too weak (28 respondents, 6%).
- 4.33** Of the 21 respondents suggesting the Code was too demanding on EDI, the majority (19 out of 21, 90%) were registered architects, one of whom was also an academic. This is similar to the overall proportion of respondents who were architects (89%).

4.34 Of the 28 respondents who suggested EDI was too weak in the new Code, the majority were registered architects (17 of 28, 61%, including four who are also academics). This is lower than the overall proportion of respondents who were architects (89%), meaning architects were less likely to suggest the Code is too lenient or weak on EDI.

4.35 Some of the respondents who argued that the Code was too demanding on EDI explained that they fundamentally disagree with the notions of equality and inclusion, for example because they were worried it would be used to stifle a difference of opinion, and some disagreed with the requirement to treat everyone with respect. Some misinterpreted the wording of the Code, and believed they would have to employ staff for reasons other than their competence and fit for the role. Others suggested that law sets the terms for EDI and the Code should not cover it.

“Diversity is never concerned with diversity of opinion. Inclusion is acceptable, it seems, unless you argue the wrong thing, in which case you are excluded. In conclusion, EDI doesn’t see the general “public”, but instead a whole range of discrete ‘communities’. Accordingly, EDI is fundamentally socially divisive.”

Registered Architect, North West

“The Respect principle is outside the scope of a Code of Conduct and represents overreach. The UK has legislation dealing with equality, any requirement over and above this represents overreach.”

Registered Architect, Wales

4.36 Respondents who argued that the Code was too weak or lenient on EDI sometimes explained that they had faced or witnessed discrimination and hoped the Code would be stronger in setting standards that would help to protect people. Some suggested the Code should be more explicit that everyone has a right to have a say (which aligns with the point made by some respondents who, conversely, felt the Code was too demanding on EDI).

“Standard 6 – Respect ... should include the requirement to foster a healthy work environment and blame free culture, allowing everyone, regardless of rank, to voice their concerns without fear of reprisal.”

Other built environment professional (on behalf of an organisation), North East

“On Respect, the ARB’s recent workplace survey highlighted the massive levels of discrimination and poor working practices across the industry. This standard can go much further in responding to this and setting a responsible bar for practice.”

Registered architect, London and South East

4.37 Whilst the numbers of respondents making these requests are small, and therefore only limited analysis can be conducted to find trends across small groups, there are some comparisons between the two opposing sentiments which suggest that underrepresented groups and younger professionals are more likely to hold the view that the Code was too lenient on EDI. For example, women were more likely to suggest EDI should be strengthened further in the new Code. Almost a third (32%) of respondents suggesting this were women, higher than the overall proportion of respondents who were women (27%). Respondents with health conditions were more likely to

request EDI be strengthened further: 18% of those who wanted a stronger focus on EDI had physical or mental health conditions that had lasted more than twelve months, compared to 9% of all respondents. None of those asking for a reduced focus on EDI reported health conditions.

Suggestions for new topics

- 4.38** There were 56 respondents who used their response to make at least one suggestion for a new topic within the Code or guidance. Many of these are already within the draft Code or will be within the guidance. Other ideas we received included:
- Wellbeing and mental health
 - The use of AI and other new technology
 - Interaction with communities and the social value of their work, such as an architect's responsibility towards public feedback or their potential role as representing a community
 - An architect's role within procurement and supply chains
 - Clearer responsibilities for coordination or oversight of parts of a design team
 - Various duties, such as doing no harm, not to mislead, and to support those in training
 - Requests for advice on day-to-day work, with examples being how to run a profitable practice, communicating value and project management
 - Suggestions that are already covered in law, such as employment rights
 - Standards on pay
 - Various suggestions on fees, including setting fees structures and that the Code should include requirements not to do unpaid work or not to make unsustainable bids for work.
- 4.39** Some of these topics would be better considered in the detailed guidance underpinning the Code rather than the overarching Standards. For example, clearer responsibilities for coordination or oversight of parts of a design team is something we could consider in our leadership guidance.
- 4.40** Some of the suggestions that were raised would not be appropriate for ARB's Code. In some cases, the suggestion raised was outside ARB's remit and are rather covered by, for example, employment law. In other cases, the suggestions raised overlap with other areas of our work; for example, use of technology is covered through the competencies architects must demonstrate through accredited qualifications or another route to joining the Register.

Other suggestions

- 4.41** Separate to new topics for the Code and guidance, 60 respondents made further suggestions. These included ideas for helping to implement the Code or suggestions for ARB to undertake work in other areas. These ideas included:
- Aligning ARB's Code with the codes of conduct from professional bodies and other organisations
 - Considering the impact of the new Code on insurance costs and the profession's ability to secure insurance
 - Clarifying the status of guidance and sharing more information about enforcement and sanctions
 - Ensuring we consider differences across the UK, particularly in building safety regimes
 - Communicating the Code and guidance, such as requesting that it's available in a centralised place, has accompanying case studies, and that we hold a webinar to support its implementation
 - Doing more to raise awareness of the Code among the public

4.42 We received requests for ARB to undertake more work in other areas outside of the Code of Conduct or guidance. These included:

- Protecting the function of an architect
- Providing more support to architects facing disciplinary action
- Ensuring the Code aligns with ARB's new Competency Outcomes for initial education and training
- Providing material aimed at clients, with examples being an explanation of fees and services they might require from an architect, and a separate code of conduct for clients.

Conclusions and next steps

Many of the points made by respondents were of sound logic and positive intent, but all suggestions have to be considered in the context of the full consultation. Overall, we learned through the consultation that there is strong agreement for all our proposed Standards and guidance topics. The two most raised opinions were in direct conflict (that the Code is too lenient, and too demanding). We will neither strengthen nor weaken the Code, as there is insufficient evidence, and conflicting opinions, about whether this would improve the professionalism of architects or improve public safety and wellbeing.

Some respondents raised helpful suggestions about the language used in the Code. We also learned more about the areas where it would be helpful for us to clarify the intention of parts of the Code and areas where respondents could be more prone to misunderstanding. This will help us to communicate the Code's final development and its implementation later this year. We will use our regular communications channels, including the ARB Insight email to registrants, to explain ARB's role and remit, and the purpose of the Code and status of the guidance. We will review all drafting suggestions, in particular to help clarify definitions in the Code and in the forthcoming guidance. We will also consider how the addition of examples, case studies or similar can help with communicating the guidance we have proposed.

We will review written feedback on the guidance topics and consider how to work with consultant respondents as we develop the guidance. For example, underrepresented groups will be engaged in the development of our EDI guidance, noting that underrepresented groups and younger professionals are more likely to hold the view that the Code should strengthen EDI.

Many of the suggestions we received are either ideas that we cannot adopt because they are outside of our statutory remit (such as fees) or that we would not be the appropriate body to do so (such as pay or employment law). However, we will consider how we can incorporate some of the helpful or more detailed suggestions into the updated Code, and the guidance we will go on to develop.

We will consult on each guidance document before it is introduced, grouping them together to reduce the number of consultations. At all times, we be clear as to what guidance applies and its role, so that architects know what is expected of, and know what standards they would be judged against should a disciplinary case come about.

Annex A: List of respondents

There were 110 respondents who gave permission for their responses to be published in full, with a further 253 asking for their responses to be published anonymously.

There were 124 responses were made on behalf of organisations, with 46 agreeing to be published in full and 62 anonymously.

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

- Adam Kingston
- Alan Dunlop Architect
- Alastair Blyth
- Allan Neil Mudie
- Amy Jones
- Andrew Cawdron
- Andrew Ozanne OBE BA (Hons) Dip. Arch. (Oxford) RIBA MCI Arb Registered Adjudicator (ACA) Mediator (ADR)
- Andrew Tam
- Andy Laverick
- Anthony Langan
- Anthony Grimshaw Associates LLP
- APSA, Association of Professional Studies in Architecture
- Architects Climate Action Network (ACAN)
- Architecture Practice
- Association of Consultant Architects
- Ben Pulford ARCHITECT Ltd
- Bob Edden Architect
- Bob inc
- Campbell Architects Ltd
- Carl Meddings
- Cem Tole
- Charles
- Charlie Doman-Lees
- CIAT
- Collective Works
- cpmg architects ltd
- D2 Design Studio Limited
- Daren Hall Architects Ltd
- David Pryce
- Dieter Bentley-Gockmann
- Kevin Kelly Architects
- Kevin Shields
- Kirsten Pont
- KR.eativ: Architects Ltd
- Lorens Holm
- Lorn MacNeal Architects
- Markos Spyrides
- Martin Sutcliffe
- MICHAEL GORDON ASTON
- Mina Samangoeei
- Mossessian Architecture ltd.
- New Order
- Oliver Carter
- Parisha Patel
- Paul Kellett
- Paul Wainwright
- Peter Richard Richard Tanner
- Peter Sennitt
- Pic
- Places Architects Ltd
- Planning and Projects srl
- Poul Anderson
- Project Orange
- Queen's University Belfast (Architecture)
- R G LICENCE ARCHITECT
- Raad Al-Hamdani
- RIBA
- George Stowell Ltd
- Richard Parnaby
- Robert O'Leary
- Robert Wilson architect ltd
- ROD KEMSLEY
- Rosita Niknafs
- Ross Lambie

- Donald Wahlberg
- Dr Kan Gunawardena
- Duncan Robson
- Edwards Rensen Architects
- Eraldo Architects Limited
- Eva Jiricna
- Falconer Chester Hall
- Gareth Russell Brown
- Gordon Shrigley Architecture limited
- Graham Rix
- GSFS Design
- Hales Marshall Design Architects Ltd
- Haris Lasantha Subasinghe
- Holi Architecture
- Hughes Architects
- Invent Design Create Ltd
- Ioana Gherghel
- Jake Johnson
- James Firth
- Jane Lock-Smith
- Jess
- John Stebbing Architects Ltd
- Kaiyi Gu
- Royal Incorporations of Architects in Scotland
- Saad Hindosh
- Sophiya Anuar
- Stephen Newsom
- Steve Baker Architect
- STUDIO RHE
- Sumita Singha
- Tereza
- The Chartered Institute of Housing
- the Edge
- The Steve Piltz Consultancy Ltd
- Tim Gough
- Tim Ross
- University of Portsmouth
- Vincent MacDonald
- Vorbild Architecture Limited
- W J Bangma
- Wendy Colvin
- Yarema Ronish

Annex B: Consultation data

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

Option	Total	Percent
Academic (registered architect)	42	9.5%
Academic (other)	3	0.7%
Registered Architect	351	79.6%
Architectural assistant, designer or consultant (not Part 3 qualified)	8	1.8%
Architectural technologist	4	0.9%
Construction contractor	0	0.0%
Architecture Student – undergraduate (studying Part 1)	1	0.2%
Architecture Student – graduate (studying Part 2)	10	2.3%
Architecture Student – Part 3 candidate	3	0.7%
Elected political representative e.g. councillor or MP	0	0.0%
Member of the public	0	0.0%
Other built environment professional	7	1.6%
Other	12	2.7%
Not Answered	0	0.0%

Option	Total	Percent
Female	120	27.2%
Male	262	59.4%
Non-Binary	0	0.0%
Prefer not to say	51	11.6%
Other	8	1.8%
Not Answered	0	0.0%

Option	Total	Percent
Asian or Asian British	21	4.8%
Black, Black British, Caribbean, African	4	0.9%
Mixed or multiple ethnic groups	10	2.3%
White	318	72.1%
Other ethnic group	20	4.5%
Prefer not to say	68	15.4%
Not Answered	0	0.0%

Table B4: Geographic spread of respondents		
Option	Total	Percent
East of England	18	4.1%
East Midlands	21	4.8%
London & South East	208	47.2%
North East	4	0.9%
North West	31	7.0%
South West	39	8.8%
West Midlands	8	1.8%
Yorkshire & Humber	10	2.3%
Northern Ireland	14	3.2%
Scotland	41	9.3%
Wales	9	2.0%
Republic of Ireland	3	0.7%
Prefer not to say	11	2.5%
Other	24	5.4%
Not Answered	0	0.0%

Table B5: Registered architects (including academics) - when qualified		
Option	Total	Percent
0-5 years ago	47	10.7%
6-10 years ago	49	11.1%
11-20 years ago	86	19.5%
21+ years ago	211	47.9%
Not Answered	48	10.9%

Table B6: Registered architects (including academics) - size of practice		
Option	Total	Percent
Small or self-employed (1-10 employees)	209	47.4%
Medium (11-50 employees)	58	13.2%
Large (51+ employees)	44	10.0%
I'm not practising at the moment	31	7.0%
I work at another type of organisation (e.g. developer, local authority)	51	11.6%
Not Answered	48	10.9%

Table B7: Health		
Option	Total	Percent
Yes	39	8.8%
No	345	78.2%
Prefer not to say	57	12.9%
Not Answered	0	0.0%

Table B8: To what extent do you agree with the proposed Standards? - Honesty and Integrity		
Option	Total	Percent
5: Strongly agree	307	69.6%
4: Agree	84	19.1%
3: Neither agree nor disagree	22	5.0%
2: Disagree	17	3.9%
1: Strongly disagree	11	2.5%
Not Answered	0	0.0%

Table B9: To what extent do you agree with the proposed Standards? - Public Interest		
Option	Total	Percent
5: Strongly agree	194	44.0%
4: Agree	114	25.9%
3: Neither agree nor disagree	64	14.5%
2: Disagree	40	9.1%
1: Strongly disagree	29	6.6%
Not Answered	0	0.0%

Table B10: To what extent do you agree with the proposed Standards? - Competence		
Option	Total	Percent
5: Strongly agree	284	64.4%
4: Agree	84	19.1%
3: Neither agree nor disagree	40	9.1%
2: Disagree	21	4.8%
1: Strongly disagree	12	2.7%
Not Answered	0	0.0%

Table B11: To what extent do you agree with the proposed Standards? - Professional Practice		
Option	Total	Percent
5: Strongly agree	257	58.3%
4: Agree	113	25.6%
3: Neither agree nor disagree	45	10.2%
2: Disagree	16	3.6%
1: Strongly disagree	10	2.3%
Not Answered	0	0.0%

Table B12: To what extent do you agree with the proposed Standards? - Communication and Collaboration		
Option	Total	Percent
5: Strongly agree	213	48.3%
4: Agree	152	34.5%
3: Neither agree nor disagree	45	10.2%
2: Disagree	21	4.8%
1: Strongly disagree	10	2.3%
Not Answered	0	0.0%

Table B13: To what extent do you agree with the proposed Standards? - Respect		
Option	Total	Percent
5: Strongly agree	240	54.4%
4: Agree	99	22.5%
3: Neither agree nor disagree	52	11.8%
2: Disagree	27	6.1%
1: Strongly disagree	23	5.2%
Not Answered	0	0.0%

Table B14: To what extent do you agree with the proposed guidance document? - Professional Indemnity Insurance		
Option	Total	Percent
5: Strongly agree	214	48.5%
4: Agree	123	27.9%
3: Neither agree nor disagree	76	17.2%
2: Disagree	16	3.6%
1: Strongly disagree	12	2.7%
Not Answered	0	0.0%

Table B15: To what extent do you agree with the proposed guidance document? - Dealing with complaints and disputes		
Option	Total	Percent
5: Strongly agree	200	45.4%
4: Agree	148	33.6%
3: Neither agree nor disagree	73	16.6%
2: Disagree	11	2.5%
1: Strongly disagree	9	2.0%
Not Answered	0	0.0%

Table B16: To what extent do you agree with the proposed guidance document? - Financial Conduct		
Option	Total	Percent
5: Strongly agree	186	42.2%
4: Agree	142	32.2%
3: Neither agree nor disagree	90	20.4%
2: Disagree	13	3.0%
1: Strongly disagree	10	2.3%
Not Answered	0	0.0%

Table B17: To what extent do you agree with the proposed guidance document? - Sustainability		
Option	Total	Percent
5: Strongly agree	207	46.9%
4: Agree	106	24.0%
3: Neither agree nor disagree	83	18.8%
2: Disagree	22	5.0%
1: Strongly disagree	23	5.2%
Not Answered	0	0.0%

Table B18: To what extent do you agree with the proposed guidance document? - Terms of Engagement		
Option	Total	Percent
5: Strongly agree	201	45.6%
4: Agree	132	29.9%
3: Neither agree nor disagree	89	20.2%
2: Disagree	8	1.8%
1: Strongly disagree	11	2.5%
Not Answered	0	0.0%

Table B19: To what extent do you agree with the proposed guidance document? - Raising Concerns		
Option	Total	Percent
5: Strongly agree	169	38.3%
4: Agree	137	31.1%
3: Neither agree nor disagree	108	24.5%
2: Disagree	13	3.0%
1: Strongly disagree	14	3.2%
Not Answered	0	0.0%

Table B20: To what extent do you agree with the proposed guidance document? - Building Safety		
Option	Total	Percent
5: Strongly agree	259	58.7%
4: Agree	94	21.3%
3: Neither agree nor disagree	59	13.4%
2: Disagree	13	3.0%
1: Strongly disagree	16	3.6%
Not Answered	0	0.0%

Table B21: To what extent do you agree with the proposed guidance document? - Equality, Diversity and Inclusion		
Option	Total	Percent
5: Strongly agree	179	40.6%
4: Agree	107	24.3%
3: Neither agree nor disagree	107	24.3%
2: Disagree	17	3.9%
1: Strongly disagree	31	7.0%
Not Answered	0	0.0%

Table B22: To what extent do you agree with the proposed guidance document? - Managing conflicts of interest		
Option	Total	Percent
5: Strongly agree	173	39.2%
4: Agree	142	32.2%
3: Neither agree nor disagree	103	23.4%
2: Disagree	9	2.0%
1: Strongly disagree	14	3.2%
Not Answered	0	0.0%

Table B23: To what extent do you agree with the proposed guidance document? - Mentoring		
Option	Total	Percent
5: Strongly agree	147	33.3%
4: Agree	127	28.8%
3: Neither agree nor disagree	128	29.0%
2: Disagree	20	4.5%
1: Strongly disagree	19	4.3%
Not Answered	0	0.0%

Option	Total	Percent
5: Strongly agree	161	36.5%
4: Agree	116	26.3%
3: Neither agree nor disagree	128	29.0%
2: Disagree	17	3.9%
1: Strongly disagree	19	4.3%
Not Answered	0	0.0%

Annex C: Qualitative analysis coding framework

General comments	
Too demanding	The Code goes too far or is too strong (generally). Includes comments about overreach from ARB. <i>If a respondent mentioned a topic below, we used both the topic below and this general tag.</i>
Too lenient	The Code should go further or is too weak (generally). <i>If a respondent mentioned a topic below, we used both the topic below and this general tag.</i>
Structure issue	The structure of how the Code is formatted or set out is not suitable
Misunderstanding	Misunderstanding about the purpose of the Code or ARB's role
Intent	Seeking clarification on the intent, status or implementation of the Code
Definitions	Seeking clarification on the definition of something within part of the Code
Unachievable	Elements of the Code unachievable and/or technically difficult (e.g. comments based either on practice size/remit of architect in construction project/types of contracts)
New topic	Suggestion to include a brand-new topic within the Code or guidance (not just a drafting suggestion)
Other suggestion	A suggestion to improve the Code outside of the Code itself (eg working with another organisation or producing something else, reviewing the Code after some time, reviewing other documents)
Topics	
Too demanding on safety	The Code goes too far on topics related to safety
Too lenient on safety	The Code should go further on topics related to safety
Too demanding on sustainability	The Code goes too far on topics related to sustainability
Too lenient on sustainability	The Code should go further on topics related to sustainability
Too demanding on EDI	The Code goes too far on topics related to equality, diversity and inclusion
Too lenient on EDI	The Code should go further on topics related to equality, diversity and inclusion

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