



# **Development of ARB's international routes to registration**

**Consultation outcome**

## Background

In October 2021 we issued a [consultation document](#) setting out our approach to the development of new international routes to registration. This included our aims and objectives, our principles and our proposed decision-making process that we intend to use when developing these. The consultation ran until mid-January 2022.

We notified key stakeholders about the consultation document, which was available on our website. We received three responses, which while low, reflects the very technical nature of the consultation. Of the three responses we received, two were on behalf of an organisation and one was from an individual. We also gathered detailed feedback which informed the development of our proposals by meeting with interested parties and holding a roundtable discussion.

This document summarises the key points that arose from the consultation and our response to each of these.

## Comments on our approach

- 1 One respondent felt that it would be helpful if the scope of our review could explicitly exclude the possibility of ARB accepting applications from overseas Higher Education Institutions (HEIs) for the prescription of specific awards at Part 1 or Part 2 level on the basis that ARB had not previously prescribed specific overseas awards and this was a complex area. Their preferred approach was that ARB should maintain the status quo in relation to this area.

**ARB Response:** We agree with this proposal and can confirm that at this stage ARB does not intend to accept applications from overseas HEIs for the prescription of specific awards. Recognising the complexity of this area, and if ARB was to consider this in the future, we would seek to gather more information and evidence regarding the position and the implications of this before taking any considerations further.

- 2 One respondent highlighted the complexities around maintaining lists of qualifications approved as equivalent for registration purposes under the terms of a mutual recognition agreement (MRA) or a memorandum of understanding (MOU). It was noted that as the number of agreements increase and due to the propensity for institutions to constantly revise their award titles, maintaining accurate lists is likely to be resource intensive, especially when discrepancies arose. It was suggested that a straightforward process would be to require any applicant for registration to submit to ARB a statement from their own regulator that their academic award met the requirements agreed under the MRA or MOU.

**ARB Response:** We welcome this feedback. We are conscious of the issues that title amendments cause and how complex it is to maintain accurate and up to date lists of qualifications. We plan to set out the qualifications/experience requirements that fall within scope of each agreement in the text of each agreement. We will require applicants for UK registration who have qualifications/experience that fall within scope of an MRA/MOU to secure a compliance certificate from our partner organisation and submit that to us along with proof of their qualifications/experience. We will require those seeking equivalence at Part 1 and/or Part 2 level only under an MOU to secure a compliance certificate from our partner organisation before going on to secure a ARB-prescribed Part 2 and/or Part 3 qualifications before being eligible for UK registration. Similarly, ARB will be providing compliance certificates to applicants wishing to register with or have their qualifications recognised by one of our partner organisations, provided they hold qualifications/experience that fall within scope of an MRA/MOU.

- 3 One respondent suggested that it would be helpful if ARB supported the development of preparation courses for the UK Adaptation Assessment given that ARB would solely be running the assessment process, as this may help reduce failure rates and improve competency standards of applicants generally.

**ARB Response:** To confirm, ARB will not offer any form of preparation course, but will offer guidance/signposting to applicants who are preparing for the UK Adaptation Assessment. We plan to carry out an evaluation of the UK adaptation process in 2023 and will look at this area in more detail at that point. We do not have any objection not preparatory courses being established in the meantime after we have published more detailed information about the new route.

- 4 One respondent outlined their experiences of registering in another country and explained the current route that they had to undertake. The respondent confirmed that they supported ARB's approach to the new international routes to registration and observed that it would reduce the burden on applicants in terms of time.

**ARB Response:** We note and welcome these comments. Our starting point is that architects are professionals wherever they trained; the due diligence that we will carry out when establishing an MRA/MOU should ensure this in terms of the education and training. We believe that for the most part, differences will relate to the context within which architects will be working, whether this be on a national level or within a specific state or territory. Both ourselves and our partner organisations are keen to apply domain specific assessments to ensure that a professional who is moving jurisdictions is aware of the context within which they will be working when they move and are prepared for safe and effective practice. Whilst we have a duty to protect the public, we also wish to support international architects before and after they join the UK Register.

## Comments on our proposals

- 5 One respondent focussed on the considerations around training, experience and equivalence of standards as well as the development of the UK Adaptation Assessment. Based on their experience and expertise, they felt that they could offer valuable advice and guidance to ARB as it developed its approach.

**ARB Response:** We note the response and are considering ways in which we can provide stakeholders with opportunities to share their expertise and advice with us. We will be publishing our proposed UK Adaptation Assessment Procedures for consultation once these have been considered by the ARB Board.

## Comments on our principles

- 6 No comments were received about our proposed principles within formal consultation responses. We do not propose to make any adjustments to the principles at this stage and will continue to base the development of our international routes on the principles as they stand.

## Comments on our communication and engagement

- 7 One respondent commented on ARB's approach to prioritising agreements and noted that they had expertise, and could obtain evidence, that could be valuable when ARB was considering which partner organisations to work with in the future.

**ARB Response:** We are pleased to have been made aware of this. We will need to develop a mechanism to gather evidence which will inform our initial considerations when we are assessing whether to work with a new partner organisation. We will discuss this further with our stakeholders and draw up plans for a way forward in the coming months.

## General comments

- 8 Two respondents commented on 'daisy chaining' through MRAs/MOUs. An example of this would be where an individual seeks to benefit from registration based upon one MRA/MOU to make use of another MRA/MOU operated in the host country. This could then support recognition in a third country where no rights of recognition would ordinarily arise based upon qualifications held. The respondents acknowledged that this was a complex area. They felt however, that it ought to be explored further so that individuals seeking to register in another jurisdiction were not unduly disadvantaged by one jurisdiction when another had accepted their qualifications/experience as being of an appropriate standard. One respondent

highlighted that if 'daisy chaining' was not permitted, it could be seen to undermine the security of the competency standards applied under an MRA/MOU, as opposed to the competency standards of those trained in the UK. Furthermore, they felt that it did not appear to be consistent with the principles stated in the proposal, or consistent with the principle of outcomes-based regulation as previously articulated by ARB.

**ARB Response:** This is a complex area and will be difficult to resolve. Partner organisations are currently keen to avoid 'daisy chaining'. We are taking a cautious approach and would highlight that some of the agreements we are working on are likely to preclude this initially, as they are founded on prescribed qualifications issued in the UK. We are open to discussing this further with partners in the future. We will continue to look at this and keep it under review.

- 9 One respondent confirmed that they were broadly supportive of the proposals within the consultation document and would welcome the opportunity to view and comment on the proposals as they were developed. Another respondent confirmed that they fully supported the approach that ARB was taking.

**ARB Response:** We welcome this feedback. We will be publishing our proposed UK Adaptation Assessment Procedures for consultation once these have been considered by the ARB Board, as well as any changes to our proposed Rules around this area. We will ensure that stakeholders are made aware of the consultation and are provided with opportunities to comment on these.

- 10 One respondent confirmed that it would be helpful if the diagram of proposed routes had a branch added to show that for MRA/MOUs there would be an alternative route whereby individuals could do the required experience and a prescribed Part 3 level qualification as an alternative to doing the UK Adaptation Assessment.

**ARB Response:** We note this and will take this on board if we can find a means of conveying this without it being confusing to the end user, provided an MRA/MOU provides for such recognition.

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



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