



Development of ARB's UK Adaptation Assessment Procedures

Key points which arose from our consultation

Background

In October 2021, we issued a [consultation document](#) setting out our approach, including our aims and objectives, our principles and our proposed decision making process that we intend to use when developing International Routes to Registration. In order to take forward our work in this area, we have subsequently been working on a set of Procedures, which are Rules of the Board, which set out in detail how we expect to implement and deliver the new International Routes to Registration. This consultation was launched in late July 2022 and ran until early September 2022. We notified key stakeholders about the consultation document, which was available on our website, and also promoted it through our social media channels. We received 23 responses through our online consultation website, and one response by email in the form of an attached narrative. Of the 23 responses we received, one was on behalf of an organisation and 22 were from individuals. Eight individuals gave permission for their responses to be published in full; ten individuals gave permission to publish their responses anonymously and five individuals did not provide their permission for their responses to be published at all.

Those responding

Of those responding, eight indicated that they were Registered Architects, either in the UK or overseas, the remainder of the responses from those in other categories were all three or fewer.

Of the 23 responses, 14 indicated that they were considering joining the Register through them, two indicated that they might employ others who could join the Register through them and seven had another interest. Of those with another interest, three were overseas architects with an interest in the new route, two were UK architects aspiring to make use of the route to register overseas and one noted an interest in the diversification of routes. Any responses to this consultation which were not received through our Citizen Space website have been considered and referred to in the key points, but have not been factored into any statistics included throughout the text below.

We have set out a summary of the key points which arose from our consultation.

Do the proposed UK Adaptation Assessment Procedures accurately and fairly deliver an assessment process which reflects our aims and objectives?

We received 22 responses to this question, 16 either strongly agreed or agreed, 4 neither agreed nor disagreed and three either disagreed, strongly disagreed or did not answer the question.

One respondent felt that the procedures only went somewhat towards delivering our objectives, noting that the assessment criteria proposed are too broad and do not focus on UK specific issues. The test should be aligned with elements of Parts 1 – 3 that would not be covered by international education or training. We note that where agreements have been made accepting qualifications as Part 1 and/or Part 2 equivalent within an MRA or MOU, we will have tested when setting up agreements that they cover the ground necessary within the UK. We note that we will be pilot testing the UK Adaptation Assessment before it

is put into operation and we will also be reviewing the route after an initial period of six months of operating, which will provide us with further opportunities to seek feedback from our advisers and other stakeholders on any adjustments that we may need to make to the UK Adaptation Assessment Criteria.

We were also asked to provide additional clarification on who will be eligible to make use of recognition under either MRAs or MOUs and at what level. We will publish full details of this as soon as agreements are signed and operational, as the content of each MRA or MOU is likely to be different.

We were asked whether our proposed international route could be aligned more closely with the requirements of another international regulator. We have sought independent expert advice and have benchmarked the UK Adaptation Assessment with the requirements of a number of our counterpart organisations when developing the route. We will be monitoring the operation of the new route and reviewing it after the first 6 months of operation.

We were asked whether there would be sufficient safeguards in place to prevent cheating and assistance during the process of application and interview. All applications will be supported by information provided directly from our international counterpart organisations, confirming that applicants are registered professionals, of whom behavioural and ethical standards are required. We view the process of application and interview as supportive, and whilst we will require confirmation that applicants are not being assisted clandestinely, we believe that the scenario based questions will be sufficiently robust to ensure the individual competence of applicants.

Feedback: I accept and respect the assessment process that ARB proposed, however i am an overseas Architect and I can't even apply to get my equivalence from Turkey without getting a job in UK and I can't find any job until i get my ARB equivalence. How can i solve this problem?. Do you have any suggestions?

ARB Response: Under both the existing Prescribed Examination route and the proposed new International Routes there is no requirement to be in employment in order to access the route, provided the eligibility requirements relating to qualifications and other requirements in each route have been met.

Feedback: "Hello,
I initially thank you all for your accepting our thoughts regarding the proposed UK Adaptation Assessment Procedures.

Briefly, I am an Architecture graduate having a Bachelor's degree in Architecture from Yildiz Technical University in Turkiye (180 ECTS) and Master's degree in Civil Construction and Real Estate Management from Riga Technical University in Latvia (90 ECTS), and I am registered to the Chamber

of Architects of Turkiye as an Architect. However, I cannot practice the profession of architect in the UK since May 2021, the time I arrived at the country.

I will naturally share my opinion from the frame I look from:

I was getting prepared to the registration procedures after Brexit for a year. As very well known, Turkiye is a European but not a European Union member country provides academic education integrated to the European education system. In the last year, before the UK Adaptation Assessment came to the agenda, graduates of the EU-member state universities were able to be recognised as Architects, and I was not able to be registered. And now, at least those privileges of the EU-graduates do not apply anymore, but I still have to overcome all these bureaucratic obstacles to be able to practice my profession.

Another interesting point was that, while my education is directly recognised in the EU countries, and EU degrees are recognised in the UK, Turkish degrees are not directly recognised in the UK. To be honest, it was very upsetting and embarrassing action. Also it can be said, it is an unintended discrimination as a result. I believe that Turkiye will place amongst Mutually Recognised Countries or there will place Mutual Recognition Agreement between the UK and Turkiye.

In conclusion, the proposal should be reviewed, the fees must not be thresholds to the registration, Mutual Recognition Agreements must be done with European but not EU countries such as Turkiye, Ukraine etc."

ARB Response: We have developed a set of principles which we will use when working with international partner organisations to decide whether to take forward negotiations concerning possible Mutual Recognition Agreements or Memoranda of Understanding. These will inform the international partners we seek to work with on developing agreements. The UK Adaptation Assessment will operate on a cost neutral basis once it has been established, which is the basis upon which we operate all other routes to registration.

Feedback: "I think the proposed route is a more accurate representation of what is required in establishing someone's competency to practice as an architect in the UK and provides solutions in breaking down barriers into the profession.

Many have left the profession, for instance starting careers in design management, due to constraints currently placed within the registration process."

ARB Response: We believe the new International Routes will provide a more cost-effective and streamlined means for suitable internationally-qualified architects to access the UK Register of Architects.

Feedback: "Re point 6.7. This requirement is not strong enough. There should be binding commitments from the partner organisations to ensure reciprocity, with clearly laid out rules and ways of their enforcement.

Re point 7.4.i) : more detail is needed of who would provide the professional career evaluation. My suggestion is to stipulate that such a person should be an UK registered Architect not related to the applicant's current position, ie. not their employing practice."

ARB Response: Reciprocity is one of the key 'Principles and Criteria' which will guide us in determining who we will work with. Any Mutual Recognition Agreements developed further to this initial assessment against our principles will include details as to what qualifications and other requirements are in scope and the means by which the agreements will be enforced. The procedures for assessment require that the applicants making use of the UK Adaptation Assessment provide their own career evaluation: we will publish guidance and templates to support this.

Feedback: Each pathway seems logical

ARB Response: We note the response, thank you.

Feedback: Yes, I support the proposed procedures. I have employed architects who have qualified elsewhere in the EU and obtained automatic conversion, and their lack of comprehension and awareness of UK-specific issues (primarily around contract law and building regulations) has been problematic. Their knowledge, especially when they are new graduates from the 5/6 year course, is not comparable to those who have undertaken Part 3 in the UK.

ARB Response: We aim for the UK Adaptation Assessment to be a supportive means of preparing international architects for practice in the UK through its focus on UK-specific requirements for practice. All applicants applying for the UK adaptation assessment will have completed a minimum period of education and training before an application will be considered. Each agreement will set out more information about who will be eligible and what will be required.

Feedback: "Please consider applicants who graduated from internationally accredited universities more than two decades ago. And have international experience working with huge companies (more than 4000 employees) on mega projects overseas. Its a shame that this candidate is not able to register as an architect due to cost and very complicated procedure. (Courses and modules) taken in university are not available any more due to their physical nature. Only available are transcripts. Its a shame that such talent and expertise not to be benefited from in the UK, although the market is in high need for talent and skills."

ARB Response: Our proposed new International Routes will benefit both newly-qualified as well as established architects, provide they meet the requirements set out in a relevant Mutual Recognition Agreement or Memorandum of Understanding. Our international partner organisations will be

responsible for the provision of information to confirm that individuals fall within the scope of an agreement.

Feedback: The exam is not fair as it's subjective plus it does take a lot of time and this is not convenient with people that are already many years experienced and have many more qualifications than the bachelor degree.

ARB Response: Although this consultation is concerned with the proposed new UK Adaptation Assessment Procedures, we are planning to conduct a review of the Prescribed Examination route once the outcomes of our review of the Initial Education and Training requirements for architects are clear.

Are there any sections of the UK Adaptation Assessment Procedures which may be unfair or discriminate against people with particular protected characteristics?

We received 23 responses to this question, 6 answered yes and 17 answered no.

Although a number of respondents have provided permission to publish responses concerning costs of the UK Adaptation Assessment, others did not, the UK Adaptation Assessment will operate on a cost neutral basis once it has been established, which is the basis upon which we operate all other routes to registration.

Feedback: As long as the registration fees apply at the beginning, the concept of money is considered a kind of threshold and it creates an inequality between professionals newly beginning to work.

ARB Response: The UK Adaptation Assessment will operate on a cost neutral basis once it has been established, which is the basis upon which we operate all other routes to registration. Our expectation is that the fee and application process will provide for internationally qualified applicants to join the UK Register of Architects more cheaply and quickly than the existing Prescribed Examination and Part 3 route.

Feedback: I don't think so, assuming suitable mitigation/alternative provision can be put in place at interview etc for people with disabilities (as it should be anyway).

ARB Response: ARB will always offer reasonable adjustments for those who may require them during any process of application. The proposed UK Adaptation Assessment Procedures refer to this at section 2.1.8.

Feedback: "The fact that someone who studied in the EU does not have to sit for the part 1 & part 2 exams while others from different countries have to! this is clearly unfair!

For me personally (and more likely the thousands in my situation), i have more than a decade of experience in London, and i have thought, oversaw and mentored students and architects from EU countries over the years. the fact that they had studied in a EU country gave them an automatic access to the Architects register! where non EU architects had to prepare 2 portfolios, sit 2 exams, get 2 years of experience and go back to university and study for one more year in order to be able to register as an architect in the UK!!!! I don't think this fair neither the right way to go forward and quite frankly this a clear discrimination which affects many architect who are professionally and socially contributing to make the uk better and better."

ARB Response: Interim arrangements for the recognition of European qualifications referred to in Annex V.7.1 to Professional Qualifications Directive will cease following an awaited Statutory Instrument to provide powers set out in the Professional Qualifications Act 2022. It will then be for the Board to determine which international qualifications it will recognise through international Mutual Recognition Agreements of Memoranda of Understanding.

We asked respondents to provide any other comments on our proposals that they had

One respondent felt that the consultation period was short and timed so as to limit the opportunity for UK practices to respond. We note that the consultation was shorter than we would ordinarily prefer, but it is important that we are able to test and operationalise the procedures in as timely a manner as possible.

Feedback: "* MRC and MRA should be detailed.

* Language requirement should be lowered. IELTS Academic 7.0 band score is very high to achieve for internationally qualified architects."

ARB Response: We will publish detail of Mutual Recognition Countries and relevant Agreements separately to the UK Adaptation Assessment Procedures as and when each agreement has been signed. These will be clearly signposted in the Registration section of our website for transparency. We will review the IELTS requirement when we review the first 6 months of operation of the UK Adaptation Assessment.

Feedback: I would suggest more emphasis on the subject of project running for all applicants. 2 years or 5 years experience need to be on all stages of the works. Too often Architects, even those already qualified in UK for more than 15 years, have matured their experience mainly at design stages (the equivalent of RIBA stage 2/3) without much technical and more holistic type of experience.

ARB Response: All applicants within the new International Routes to Registration will have completed a period of education and training comparable to that expected when qualifying within

the UK. This evaluation will form part of our initial decision on whether to progress to a more formal discussion when considering a request from a partner organisation to begin dialogue about developing a Mutual Recognition Agreement.

Feedback: I would assume the adaptation assessment procedures/ examination align with the level of knowledge, skill/ ability, understanding expected at the Part 3 examination level.

ARB Response: The UK Adaptation Assessment Criteria are derived from but are not identical to those that apply to Part 3 qualifications. We believe a lighter-touch approach to assessing applicants who have already qualified under a Mutual Recognition Agreement is more appropriate. As part of the development of MRAs and MOUs, we will have completed due diligence to ensure the substantial equivalence of qualifications. The assessment will focus in particular on the UK context for practice.

Feedback: It will be great if there is a short course to support before the assessment. As an architect who graduated from outside the UK, it was a challenge for us to live in the UK even if we are qualified or had long experience, we didn't have any chance to live properly in the UK. It would be great to give chances for non-UK architects living with their families in the UK to have a chance to practice within the firm they studied with passion and hope to continue to spend their lives working on it.

ARB Response: We do not propose to offer a course to applicants, as that would incur additional ongoing costs. We will provide online resources and links to suitable material to enable applicants to prepare for the assessment. We have no objection to schools of architecture and other providers developing resources in the form of courses or seminars to assist applicants.

Feedback: I am interested in understanding if the ARB are looking to recognise degrees from Australia. Due to recent free trade discussions and the ARB looking for mutual recognition with the AACA (Australian Regulators) I see little reason why Australian's would continue to be made to undertake Prescribed Exams.

ARB Response: Our periodic updates on the developments in our international work have included information about a Mutual Recognition Agreement we have been developing with AACA in Australia and NZRAB in New Zealand.

Feedback: Highly welcomed; please get it sorted!

ARB Response: We await new powers to enter into Mutual Recognition Agreements, which we expect to receive in the early part of 2023: these will enable us to enter into any agreements which the Board has approved after that time.

Feedback: "Would the MRA require the applicants to further submit anything to demonstrate their recognition of Part 1&2 qualifications in like of the prescribed portfolios and other substantiation and such? (if they attended a university with proper architectural degree recognized by RIBA)

Noting that the documents and outlines propose for the new international routes to be operational by early 2023, is there a more precise month and will this be fairly certain. And will the application for such recognition be available as soon as the legislations pass"

ARB Response: The underlying degree and/or masters-level qualifications underpinning any Mutual Recognition Agreement or Memorandum of Understanding will already have been evaluated as equivalent to Part 1 and/or Part 2 level, according to the level at which an agreement operates, and no further reconsideration of these will be necessary. Our partner organisations will issue confirmations that relevant accredited qualifications have been secured and that other requirements relevant within an agreement have been completed.

Feedback: I would urge the ARB to reconsider the proposed procedures, and make one route for EU and Non EU professionals.

ARB Response: Interim arrangements for the recognition of European qualifications referred to in Annex V.7.1 to Professional Qualifications Directive will cease following an awaited Statutory Instrument to provide powers set out in the Professional Qualifications Act 2022. It will then be for the Board to determine which international qualifications it will recognise through international Mutual Recognition Agreements of Memoranda of Understanding.

Applicants whose qualifications are not covered by a relevant agreement or memorandum will still be required to apply through the Prescribed Examination route and complete a UK Part 3 qualification in order to be eligible to join the UK Register of Architects.

Feedback: Evaluating certificates will be easier than taking the whole process of the exam and when the person is equivalent to part 3 you cannot ask them to start from part 1. This is totally unfair.

ARB Response: The UK Adaptation Assessment does not seek to reconsider the underlying degree and masters level qualifications secured by applicants qualifying under a relevant Mutual Recognition Agreement. Applicants will however need to demonstrate that they have met the UK Adaptation Assessment Criteria through the submission of an application and a subsequent Professional Interview. We do not believe that the process of evaluating certificates will provide the regulatory assurance that international applicants have met the requisite standards to qualify them to join the UK Register of Architects.

General comments

A number of general comments were made covering ground set out in the main questions above. The responses above cover these points.

If you need information on this document in a different format such as an audio recording or braille, you can:

- email info@arb.org.uk
- call 020 7580 5861
- write to us at ARB, 8 Weymouth Street. London W1W 5BU

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



For more information please contact
the Architects Registration Board
8 Weymouth Street, London W1W 5BU
Web: www.arb.org.uk
Email: info@arb.org.uk
Telephone: +44 (0) 20 7580 5861