


International Routes to UK Registration for Architects

Consultation on a new
approach

October 2024

 Architects
Registration
Board

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Chapter One

Executive Summary

UK Registration for Internationally Qualified Architects

- 1.1 ARB is the professional regulator responsible for setting the standards for registration as an architect.
- 1.2 Registration exists to protect the public, so that anyone calling themselves an architect has the appropriate skills, knowledge, experience and behaviours. ARB must ensure that standards of competence are maintained however professionals join the UK Register.
- 1.3 We recognise, or 'accredit', UK qualifications that enable people to join the architects' profession and we set international routes for those without UK qualifications. Having recently reformed how we regulate UK qualifications – which included updating the competencies that architects need to demonstrate – we want to overhaul our international routes to UK registration to align them with our new approach to UK education and training. Additionally, from 2027 ARB will no longer require UK-qualified architects to have a Level 6 (Level 9 in Scotland) accredited undergraduate degree in architecture. The eligibility requirements for the exam must be updated to reflect that approach.
- 1.4 We are also aware that the current route open to the majority of internationally qualified architects, the Prescribed Exam, is in urgent need of a complete overhaul. The assessment methodology used in the exam is outdated and complex, and candidates often report deep frustration with the assessment format and process.
- 1.5 ARB has also signed international agreements with counterparts in other countries, including, at present, the United States, Australia and New Zealand, and Hong Kong. Eligible internationally registered professionals seeking to join the UK Register through one of these agreements must take the UK Adaptation Assessment, to demonstrate that they are familiar with the UK context and ready to practise in the UK. In overhauling the Prescribed Exam, there is also an opportunity for us to simplify the UK Adaptation Assessment.
- 1.6 We are therefore proposing changes that aim to align our international routes with our new approach to UK initial education and training, and to improve access to the UK Register by simplifying the examination process and removing unintended complexity and barriers.

Proposed Changes

- 1.7 We are proposing the following changes to the registration requirements assessed through the Prescribed Exam, the eligibility requirements, and the administration and the assessment format of the exam:

Competence-based assessment

- Assessment would be based on ARB's Academic and Practice Outcomes (in place of the outgoing Criteria).
- It would assess equivalent competence and UK context-specific knowledge (instead of equivalent qualifications).

Single gateway

- There would be a single examination gateway to the Register (instead of requiring two exams to prove equivalence to Part 1 and/or Part 2, and in addition, requiring a Part 3 UK-accredited qualification).

Improved eligibility

- Simpler eligibility requirements would be based on qualifications that focus on architecture and meet ARB's UK professional practical experience requirements (without reference to the number of years spent in education and training).

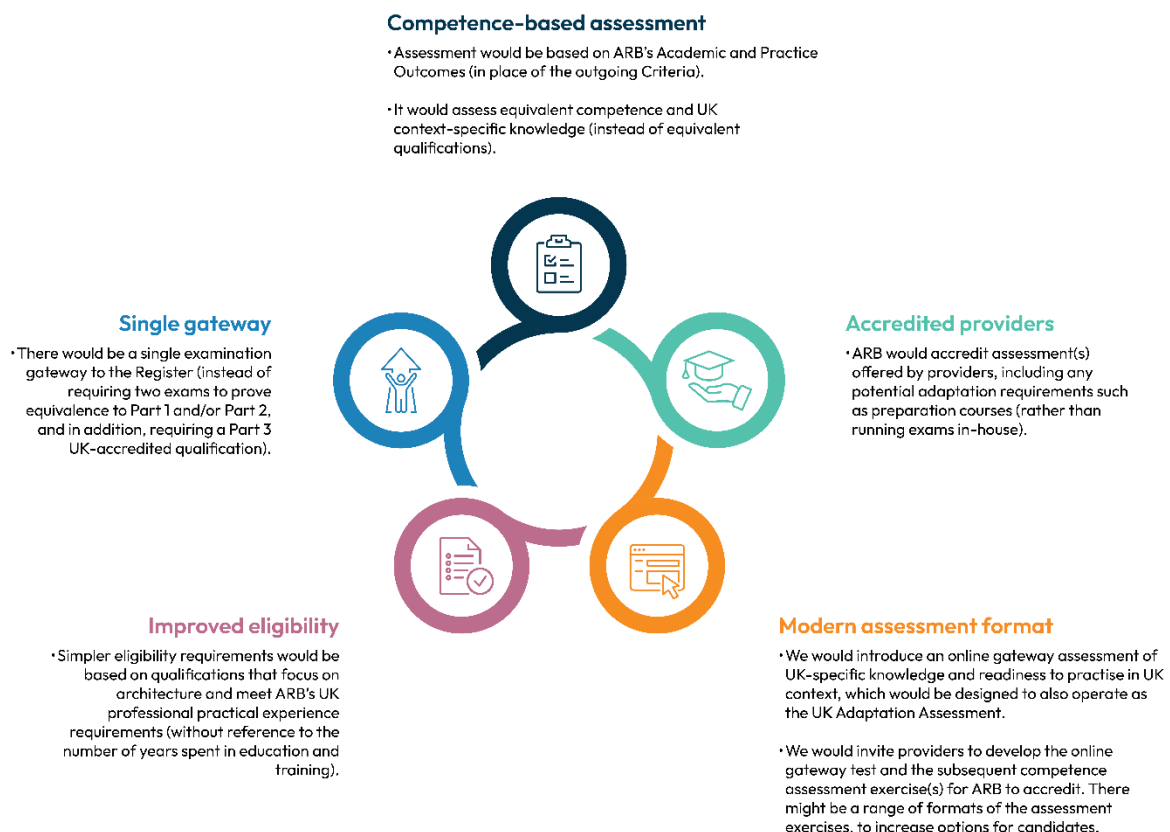
Accredited providers

- ARB would accredit assessment(s) offered by providers, including any potential adaptation requirements such as preparation courses (rather than running exams in-house).

Modern assessment format

- We would introduce an online gateway assessment of UK-specific knowledge and readiness to practise in UK context, which would be designed to also operate as the UK Adaptation Assessment.
- We would invite providers to develop the online gateway test and the subsequent competence assessment exercise(s) for ARB to accredit. There might be a range of formats of the assessment exercises, to increase options for candidates.

Figure 1.1: Proposed changes to the Prescribed Exam and UK Adaptation Assessment



Consultation

- 1.8 In this paper we explain why we are proposing those changes, how we would implement them and how long it would take us to do so. We are inviting views and ideas from all and any interested individual and organisations to help us shape our approach before we consider implementing it.
- 1.9 Our overhaul of the assessments will be an iterative process. We will only be able to set out more detail once we understand whether stakeholders agree that our proposals are likely to improve our international routes.
- 1.10 We will consult on the proposals in this paper for three months. The consultation will close on **Monday 6 January 2025**, at which point all responses will be analysed and we will consider how to respond to feedback and improve our proposals. Our analysis and the Board's decision will be published in 2025.
- 1.11 All ARB consultations can be found online at: arb.org.uk/consultations/.

Chapter Two

The Architects Register

ARB's role

- 2.1 ARB is an independent professional regulator, established by Parliament as a statutory body, through the Architects Act, in 1997. We are accountable to government.
- 2.2 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'.
- 2.3 ARB has legal responsibility for determining the competence someone needs to become an architect and join our Register. This is set out under section 4(1) of the Architects Act. The main way we achieve this is by setting the standards for qualifications, and assessing and accrediting individual qualifications delivered by UK learning providers. This is the most common route by which professionals qualify as an architect in the UK and join the Register.
- 2.4 ARB also has a duty to ensure that those who apply for registration without UK qualifications accredited by us have an equivalent standard of competence to those who enter the Register with accredited qualifications. This is set out under section 4(1)(b) of the Architects Act.
- 2.5 We therefore also set routes for internationally qualified architects to join. One of these is the Prescribed Exam, carried out under section 4(2) of the Architects Act. We will explain this and our other international routes in Chapter Three of this paper.

Architects Act 1997¹

4.— (1) A person who has applied to the Registrar in the prescribed manner for registration in pursuance of this section is entitled to be registered if—

(a) he holds such qualifications and has gained such practical experience as may be prescribed; or

(b) he has a standard of competence which, in the opinion of the Board, is equivalent to that demonstrated by satisfying paragraph (a).

[...]

(2) The Board may require a person who applies for registration on the ground that he satisfies subsection (1)(b) to pass a prescribed examination in architecture.

¹ The Architects Act 1997 is available online: <https://www.legislation.gov.uk/ukpga/1997/22/contents>

The UK Route to Registration

- 2.6 Registration exists to ensure anyone calling themselves an architect has the appropriate skills, knowledge, experience and behaviours.
- 2.7 In 2023 ARB announced major reforms to how architects are trained and educated in the UK. The reforms include:
- A change to the [regulatory framework](#) so that we will accredit at two stages: Masters qualifications (Level 7, and Level 11 in Scotland) and practice qualifications, such as diplomas.
 - New [Competency Outcomes](#) on which the qualifications we accredit must be based.
 - New [Standards for Learning Providers](#) delivering ARB-accredited qualifications, and a new proportionate and risk-based quality assurance of qualifications, overseen by an Accreditation Committee.
- 2.8 By no longer mandating an undergraduate degree specifically in architecture for all future architects and accrediting undergraduate qualifications, we are reducing regulatory bureaucracy and increasing flexibility and routes into the profession.
- 2.9 Our framework is moving to an outcomes-based approach in which our regulatory focus is on what an individual must know, what they must be able to do, and how they must behave, rather than how and what they are taught. This is supported by the new Competency Outcomes that will replace the [old Criteria](#). A learning outcome is a measurable achievement that an individual will be able to demonstrate at the end of any particular stage of their education and training, and can be mapped against the practice requirements of being a newly registered architect.
- 2.10 Adopting an outcomes-based approach shifts away from the current rules-based approach which is a disincentive to innovation and encourages ‘tick-box’ monitoring of compliance. Focussing on outcomes, underpinned by a clear set of standards for learning providers, is intended to improve quality and accountability, and be better suited to reflecting desired practice standards. It is an approach that is followed by similar standard-setting bodies for other professions, and one already widely understood within Higher Education.
- 2.11 ARB is currently implementing these education reforms. Through our transition timetable, we anticipate that all students graduating after 2028 will have qualified through the new education model (with some exceptions for part-time students or those with particular circumstances).²

² The transition timetable is available on ARB’s website: <https://arb.org.uk/wp-content/uploads/Transition-timetable-PDF.pdf>

Chapter Three

International Routes to Registration

ARB's Role

- 3.1 ARB has legal responsibility for routes to registration for applicants who have an equivalent standard of competence to an architect with accredited qualifications and practical experience. At present these routes include:
- ARB's Prescribed Exam;
 - Mutual Recognition Agreements (MRAs) or Memoranda of Understanding (MOUs) that ARB has signed with international counterparts;
 - A legacy approach to the recognition of EU qualifications.
- 3.2 These three routes are all based on recognition of qualifications, or a process of mapping UK and international qualifications. This has been used historically as the key proxy measurement for competence.
- 3.3 This paper concerns the Prescribed Exam, and the assessment included in the MRA and MOU routes, which is the UK Adaptation Assessment. The way we recognise EU qualifications is subject to negotiation between the UK Government and EU Commission and due to be reviewed by the Board later in 2024 or early 2025, with a view to replacing it with a new UK/EU MRA.
- 3.4 The rest of this chapter will explain the current approach taken in both the Prescribed Exam, and the UK Adaptation Assessment.

The Prescribed Exam

Requirement for Registration

- 3.5 ARB has the power to require an applicant to pass a prescribed examination in architecture before the entitlement for registration is granted. The legislation does not place limitations on the form of the examination. The legislation provides some flexibility, in that the Prescribed Exam is not the only option by which ARB can reach an opinion of equivalence.
- 3.6 At present, the Prescribed Exam is based upon ARB's Criteria that are set across three stages of education and training, and therefore three stages of accredited qualifications. ARB's examination procedures state that "a person may be of an equivalent standard of competence if they hold qualifications which are equivalent to the prescribed qualifications."
- 3.7 As such, the Prescribed Exam is structured to test for equivalent qualifications. Applicants seeking to join the Register through the Prescribed Exam route must:
- pass a Part 1 Prescribed Exam,
 - pass a Part 2 Prescribed Exam, and
 - achieve a Part 3 UK accredited qualification.
- 3.8 Applicants only need to sit the Prescribed Exam where they do not hold an accredited qualification by ARB for that Part. For example, someone with a Part 2 accredited qualification but no Part 1 accredited qualification will need to sit only the Part 1 Prescribed Exam. A Part 3 accredited qualification is still necessary, as there is no prescribed exam to test for Part 3 equivalence.

Eligibility

- 3.9 Candidates are eligible for the Part 1 Prescribed Exam if they have gained a non-accredited qualification in architecture at first degree level after completing a course of at least three years' full time duration or part time equivalent. This means that ARB's procedures specify that candidates must have a qualification that is the result of a course that lasted at least three years (or the equivalent in part-time study).
- 3.10 Candidates with qualifications at first degree level with an architecture component which has been studied alongside other subjects, may also be eligible for the Part 1 Prescribed Exam. These candidates need to submit evidence from the awarding institution which demonstrates that Part 1 criteria have been covered and that the qualification principally concerned architecture.
- 3.11 Candidates are eligible for the Part 2 Prescribed Exam if they have completed a non-accredited architecture qualification at the second-degree level or a diploma that is the result of two years of full-time study or the equivalent amount of study part-time. Similar to Part 1 eligibility, candidates with a second degree or higher, with an architecture component which has been studied alongside other subjects, may qualify for the Part 2 Prescribed Exam (with evidence required to demonstrate the criteria have been covered and architecture was the principal focus).
- 3.12 Candidates who hold a five-year qualification which is principally concerned with architecture can use this qualification to meet the eligibility requirements at both Part 1 and Part 2 levels. They would need to demonstrate how the first three years meet the eligibility requirements at Part 1, and the second two years to meet the eligibility requirements at Part 2.
- 3.13 Taken together, ARB's examination procedures require a candidate's qualifications to take the form of a '3+2' structure, meaning we require a) a three-year qualification and a two-year qualification or b) at least five years of study principally in architecture.
- 3.14 In addition, we require that candidates whose first language is not English are required to submit a valid International English Language Testing System (IELTS) certificate of 6.5 or above with their application for examination. Alternatives to IELTS may be proposed by candidates and considered by ARB.
- 3.15 Further detail about the Prescribed Exam, including eligibility, can be found in ARB's examination procedures.³

Administration

- 6.1 ARB administers the Prescribed Exam. In practice, this means that ARB employs a staff team to manage the process for candidates, including scheduling exams, liaising with candidates, and checking materials to confirm a candidate's eligibility. ARB also appoints and manages a pool of examiners.
- 3.16 Candidates must complete application documents and submit them to ARB to book an examination. The documents include a digital application form with important information about the candidate and their qualifications, and a Comparative Matrix that maps how the candidate has been examined against requirements comparable to ARB's Criteria. Candidates must also prepare supporting material (a portfolio of evidence) but this is not submitted alongside the other application documents; it is

³ <https://arb.org.uk/wp-content/uploads/2016/05/Examination-Procedures.pdf>

only requested once ARB has reviewed the other documents including for evidence of plagiarism and confirmed the candidate's eligibility to proceed.

- 3.17 ARB appoints a pool of examiners who are registered architects from both practice and academia. Three examiners from the pool are selected to form the examination team (henceforth the examiners) for each candidate. One examiner will lead the examiners and be responsible for ensuring that all time limits are adhered to and that the appropriate administrative work of the examiners is completed. They will also act as the main point of contact between the examiners and ARB staff. The examiners will be required to make a judgment as to whether or not they are content that the candidate has demonstrated compliance with all of ARB's Criteria and will report that judgment in writing to ARB. Quality assurance of the examination process is achieved using an Independent Examiner, who observes examination deliberations and decisions, and ensures consistency.

Assessment

- 3.18 In the Prescribed Exam, candidates are examined through the following methods:
- a Comparative Matrix must be submitted by the candidate stating where and how they believe the supporting material demonstrates compliance with each of the Criteria;
 - supporting material must be provided by the candidate, which may include designed projects, technical essays and dissertations, or any material that the candidate deems relevant;
 - an examination interview in which the candidate must give oral explanations on the Comparative Matrix and supporting material they submitted.
- 3.19 Further information about the process and assessments undertaken in the Prescribed Exam is available on ARB's website.⁴

International Agreements

Requirement for Registration

- 3.20 Following the UK's exit from the European Union and supported by changes to legislation, ARB is now able to enter into Memoranda of Understanding (MOUs) and Mutual Recognition Agreements (MRAs) with other regulatory bodies (or competent authorities) around the world.
- 3.21 MRAs and MOUs open up professional registration by streamlining registration processes and reducing costs and examinations, whilst upholding and maintaining the high standards and safety that help to protect the public in both nations. This means that when ARB signs an MRA or MOU, we are confirming that we have confidence that the competence of architects on an international register or with certain qualifications have equivalent competence to architects trained and educated in the UK.
- 3.22 ARB developed an approach to the assessment of competence of international architects through a mutual recognition agreement. Our approach includes three key stages:

⁴ <https://arb.org.uk/architect-information/applying-for-registration-for-the-first-time/i-hold-overseas-non-recognised-uk-qualifications/the-examination/>

- A desk based assessment about whether the qualifications accredited by ARB and in the relevant country or jurisdiction were broadly equivalent.
 - That there were robust quality assurance mechanisms in place to give us confidence that qualified architects had achieved the relevant standards.
 - The development of a new, proportionate assessment (the UK Adaptation Assessment) which would provide confidence to the Board, and the public through the Board, that any candidate applying through the MRA or MOU route had familiarised themselves with the UK context and was 'ready' to practise in the UK.
- 3.23 These three elements, taken together, have been the key mechanism for MRAs signed so far. ARB has also set out principles to underpin all MRAs, which help us determine which jurisdictions we can explore agreements with. The principles are available on ARB's website.⁵

Eligibility

- 3.24 At the point of publishing this paper, ARB has signed MRAs between the UK and Australia, New Zealand and the United States, and an MOU with Hong Kong.
- 3.25 The eligibility criteria for applicants differs slightly between MRAs. A ['route finder'](#) on ARB's website helps architects identify whether they are eligible to use an MRA as a route to registration. It is the responsibility of applicants to obtain and continue to have at all times lawful authorisation to work in the UK.
- 3.26 All applicants through any MRA must pass ARB's UK Adaptation Assessment before being admitted to the UK Register, unless they already hold a UK Part 3 qualification
- 3.27 To test the applicant's preparedness to practise safely in the UK context, the UK Adaptation Assessment tests criteria including understanding of:
- Clients, users and delivery of services, including the briefing process, forms and terms of appointment, the means of professional remuneration, relevant legislation, and the execution of appropriate programmed and coordinated project tasks.
 - Legal frameworks and processes, including the legal context within which an architect must operate, and the processes undertaken to ensure compliance with legal requirements or standards.
 - Building procurement, including UK construction and contract law, construction procurement processes and the roles of built environment professionals.
- 3.28 As with the Prescribed Exam, we require that candidates whose first language is not English are required to submit a valid International English Language Testing System (IELTS) certificate of 6.5 or above with their application for examination. Alternatives to IELTS may be proposed by candidates and considered by ARB.
- 3.29 Further information on these agreements, including who is eligible to use them and how to apply through them, can be found on ARB's website.⁶

⁵ <https://arb.org.uk/international-routes/mras-and-mous/>

⁶ <https://arb.org.uk/international-routes/>

Administration

- 3.30 ARB administers the UK Adaptation Assessment.
- 3.31 Applicants must submit a completed application form and all requirements to ARB, including certification issued by a signatory to a relevant MRA or MOU.
- 3.32 The format of the assessment includes submitting a Reflective Career Summary and supporting material, preparing and submitting written responses to UK scenario-based questions and a professional interview. This submission is checked for evidence of plagiarism.
- 3.33 ARB appoints a pool of assessors who are UK registered architects from practice and academia. Two assessors from the pool will be chosen by ARB to form the assessment team for each applicant. The assessors will be responsible for ensuring that all time limits are adhered to; that the appropriate administrative work is completed, and will liaise with ARB's staff as required. They will review the applicant's documents and attend the professional interview, and are required to make a judgment as to whether or not they are confident that the applicant has demonstrated that they have met the UK Adaptation Assessment criteria. They report that judgment in writing to ARB.

Assessment

- 3.34 Applicants for the UK Adaptation Assessment submit a Reflective Career Summary, integrating a curriculum vitae, and presented in a template provided by ARB. This exists to demonstrate a factual summary of the applicant's education and practical experience since commencing their formal architectural training.
- 3.35 The applicant is then assessed through a professional interview focused on the applicant's written responses to a series of UK scenario-based questions. The applicant will be issued with a set of scenario-based questions following receipt and acceptance of a fully-completed application.
- 3.36 The full procedures and process for the UK Adaptation Assessment can be found on ARB's website.⁷

⁷ <https://arb.org.uk/wp-content/uploads/ARB-UKAA-Procedures.pdf>

Chapter Four

Objectives and Evidence Base

- 4.1 Our Corporate Strategy 2022-2026 committed to continuous improvement in our regulatory services by modernising and transforming the way in which ARB operates. In modernising our services, we are committed to delivering regulation which adheres to the high-level principles of good regulation: proportionality, accountability, consistency, transparency and targeting.
- 4.2 ARB has a duty to ensure that those who apply for registration without UK accredited qualifications have an equivalent standard of competence to those who enter the Register with accredited qualifications. Our legislation states that we can achieve this through the Prescribed Exam. Under our legislation, ARB is not obliged to operate the Prescribed Exam or for it to be the only means to reach an opinion of equivalence.
- 4.3 We need to change our international routes to registration to reflect the competencies architects will be expected to demonstrate in the future, as set out in our new approach to UK education and training. But more than this, the methodology of the Prescribed Exam is in acute need of reform.
- 4.4 We frequently receive feedback that the process and format of the exam are unsatisfactory, and there are inconsistencies with the results of the exam. For example, someone who has successfully achieved an accredited Part 2 and/or Part 3 could fail the Part 1 Prescribed Exam, or even be ineligible to sit it under current rules. The exam takes the form of a complex mapping exercise and if English is not someone's first language, they may struggle with context and expression.
- 4.5 Our objectives are therefore to align our international routes with our new approach to UK initial education and training, and to improve access to the UK Register by simplifying the examination process and removing unintended complexity and barriers, but without lowering standards.

Candidate feedback

- 4.6 On 16 May 2024 we hosted an online listening event on the Prescribed Exam. We invited previous candidates, examiners, employers and others who have expressed an interest in the topic. On the day, 38 attendees joined us, having trained in Brazil, India, Iran, Nigeria, Serbia, South Africa, Syria, and the USA, amongst other countries.
- 4.7 Through an online poll, attendees were asked to suggest one word to describe their experience or view of the exam. The most common words were: complicated, complex, and convoluted. Other feedback included: costly; bureaucratic; unfair; frustrating; stressful; overtaxing; humiliating; and unclear. None of the words volunteered in the online poll were positive.

Figure 4.1: Word cloud generated by event attendees to describe the Prescribed Exam



4.8 During the discussions, attendees told us that:

- The forms and procedures are complex and difficult to understand and use.
- The Criteria are difficult to interpret. Candidates felt that they had to guess what was needed, which led to concerns about how the examiners would interpret the evidence presented and whether it would be acceptable.
- It is difficult to compile the portfolio and gather information from different projects to prove how different Criteria are met. It requires evidence of their degree work, and where a candidate had completed their degree some time ago it was difficult to find that work. Participants felt the portfolio takes an excessive amount of time and effort, which is difficult to balance with work commitments.
- Some participants described the difficulty they found with an assessment that takes an interview format. One examiner felt that some candidates have the right competencies but find it difficult to distil the specific evidence needed when they are in the exam.

4.9 We have also heard that our complex eligibility requirements reduce flexibility. The requirements present barriers for architects coming from countries where there are different routes to registration, such as the United States, where many architects do a non-architecture initial undergraduate degree and transfer to an architecture programme later in their academic journey.

Survey of Internationally Qualified architects

4.10 In addition to feedback about the process and format of the exam, we have also observed evidence that can support us in developing a more targeted exam. The exam could take a more proportionate approach to the risk it exists to address: to give internationally qualified architects the opportunity to demonstrate that they have an equivalent architectural competence as UK qualified architects and can maintain the standards of the registered profession.

- 4.11 In January 2024 ARB surveyed internationally qualified architects. We wanted to gather insights into whether there are any particular knowledge or skills gaps between UK and internationally- qualified architects. We received 194 responses.
- 4.12 The survey demonstrated some self-reported knowledge gaps that affect EU and other internationally qualified architects' readiness to practise in the UK. In order to maintain public safety through the integrity of the Register, any gaps will need to have been addressed before an individual is registered to practise.
- 4.13 Three quarters (74%) of respondents received or sought out support or independent learning to adapt to UK practice. The most common topics that respondents identified needing support with were:
- UK building regulations and legal requirements (60% of respondents)
 - UK planning (42% of respondents)
 - Design codes and standards (23% of respondents)
- 4.14 There is an opportunity to develop an exam that specifically targets the knowledge gaps that internationally qualified architects have reported through the survey as well as provide assurance around wider competencies.

Chapter Five

Principles to guide our new approach

We have developed a set of principles to guide our approach to overhauling the Prescribed Exam and updating the UK Adaptation Assessment. The principles are set out below.

Principles

The following principles will guide ARB's overhaul of the Prescribed Exam and updates to the UK Adaptation Assessment

1. Safety and competence

- Applicants should be provided with the opportunity to demonstrate equivalence of relevant architectural competence sufficient to protect the public.
- Assessment should not determine the equivalence of inputs (e.g. qualifications or experience) and instead assess equivalence to the competency outcomes.
- The pathway to registration should support an applicant to demonstrate competence in the UK legal, ethical and professional context.

2. Fairness and inclusivity

- A range of assessment methods should be used to assess competency and reduce the potential for bias and exclusion.
- The assessment process should be accessible to all applicants and not create an unfair advantage for certain types of applicants.
- The prescribed examination's purpose is to assess equivalent competence for applications to the Register, and not for equivalence to pursue training in the UK.
- The route to request a review of an assessment decision must be accessible to all applicants.

3. Simplicity and flexibility

- The pathway to registration should be simple to navigate for applicants, and simplicity should drive efficiency and cost-effectiveness.
- Duplication of assessment should be avoided wherever possible.
- The process should be adaptable to the particular needs of candidates, recognising that applicants may be newly qualified, long-experienced, or facing legitimate difficulties in meeting the requirements of the assessment (e.g. people with refugee status, or people with additional learning needs).
- Where an applicant cannot demonstrate competence, the route to gain further qualifications or experience should be broadly proportionate to the gaps in competence required for registration.

4. Transparency

- The expectations and requirements placed on applicants at all stages should be clear and published.

- Expert assessors should make judgements on competency, based on clear and published competencies.
- Applicants should receive clear and actionable feedback in the event they cannot demonstrate equivalent competence.
- The quality assurance of the assessment process should be transparent and provide confidence in the validity and fairness of the assessment process.

Chapter Six

Outline for a new approach

- 6.2 Guided by our objectives, principles and evidence base, we want to propose how an improved Prescribed Exam and UK Adaptation Assessment might operate.
- 6.3 In this chapter we set out the main changes we would like to make to both assessments. At this stage, we are publishing our proposals for consultation, to test our ideas and receive feedback. Our overhaul of the assessments will be an iterative process. We will only be able to set out more detail once we understand whether stakeholders agree that our proposals are likely to improve our international routes.
- 6.4 Below is an explanation of the changes we are proposing.

Requirement for Registration

- 6.5 Having moved to an outcomes-based approach to our regulatory framework for UK routes to registration, we intend to change our international routes to align with this approach. As explained in Chapter One, our new [Competency Outcomes](#) set out what an individual must know, what they must be able to do, and how they must behave, rather than how and what they are taught.
- 6.6 **The exam would therefore change to assess equivalent competence, instead of equivalent qualifications.** This means that rather than testing that someone's qualifications covered the same taught content, the exam will test their competence as it stands as a result of their qualifications. In other words, the exam will be used to prove that their skills, knowledge, expertise and behaviour and equivalent to those achieved by other registrants.
- 6.7 The format of the exam will change as a result. This is considered further in the *Assessment* section below.
- 6.8 The single set of competencies that must be achieved to join the UK Register of Architects are set out at two stages: Academic Outcomes and Practice Outcomes. They are assessed at different levels across the Academic and Practice qualifications. For example, to achieve an Academic qualification (e.g. an accredited Master's) an individual may need to demonstrate *knowledge* of an outcome, and at Practice level they will need to be able to demonstrate the *ability* to apply it. An example is shown below for Management, Practice and Leadership.

Figure 6.1: Sample of the Competency Outcomes required of ARB accredited qualifications

Outcome		Academic Outcomes	Practice Outcomes
M1	Make use of the principles of sustainable, responsible and ethical practice, and recognise how they relate to running an architect's practice. E	Knowledge	Ability
M2	Understand the financial and resource management aspects of running an architectural practice including the means of professional remuneration and fee setting.		Understanding
M3	Recognise the ethical and legal impact of practice structures, recruitment and employment terms and their impact on work/life balance, health and the wellbeing of colleagues. I		Understanding
M4	Manage and structure projects, administer construction contracts and resolve common construction-related challenges.	Understanding	Ability

- 6.9 **The structure of the competencies means that examining someone at one single point is the simplest and most effective way of ensuring equivalent competence.** Taking this approach would mean future candidates would not need to pay for, prepare for and pass multiple exams. It therefore has the benefit of saving time and money for candidates, whilst maintaining the standard of competence on the Register.
- 6.10 The Competence Outcomes include practical, UK-specific knowledge that must be demonstrated by all registrants. Our survey of internationally-qualified architects (summarised in Chapter Four above) found that that whilst there is no significant competence gap between UK-qualified and internationally-qualified architects, there is a gap in the local or context-specific knowledge architects need in order to work in the UK.
- 6.11 **We therefore believe that a new competence-based exam should include an assessment of UK-specific knowledge in order to demonstrate that candidates are fully prepared to practise safely and effectively in UK.** This would be reflected in the UK Adaptation Assessment; see the *Assessment* section below for more information.
- 6.12 The table below summarises these outline proposals by comparing them to the current requirements.

	Current requirement for registration		Future requirement for registration
Prescribed Exam	<ul style="list-style-type: none"> • Based on ARB's Criteria • Two exams (Part 1 & /or Part 2) and an additional UK-accredited qualification (Part 3). • Assessment of equivalent qualifications. 	→	<ul style="list-style-type: none"> • Based on ARB's Academic and Practice Outcomes. • One single examination point. • Assessment of equivalent competence and UK context-specific knowledge.
MRA	<ul style="list-style-type: none"> • Based on ARB's Criteria. • Proof of MRA-recognised qualifications and successful UKAA. 	→	<ul style="list-style-type: none"> • Based on ARB's Academic and Practice Outcomes. • No change: Proof of MRA-recognised qualifications and successful UKAA.

Eligibility

- 6.13 ARB has maintained eligibility requirements that are designed to ensure international qualifications are equivalent to UK qualifications. As such, the requirements stipulate the amount of time dedicated to the topic of architecture (to account for international degree structures that integrate other topics) and the duration of the qualification itself (to match UK requirements for work experience that is gained between – at present – three separate accredited qualifications).
- 6.14 Another consequence of moving to an outcomes-based approach would be that a competence assessment removes the need for us to require a specific duration for previous qualifications.
- 6.15 **Improved eligibility requirements would require that candidates have international qualifications based on architecture, with no reference to how the**

qualification was delivered nor its duration. We would not specify what proportion of teaching or time must have been spent on architecture, but rather that the qualification gained explicitly references architecture.

- 6.16 Candidates would also need to meet whatever professional practical experience requirements are in place by ARB at the time of their application (following the work of ARB’s independent Professional Practical Experience Commission).
- 6.17 The table below summarises these outline proposals by comparing them to the current requirements.

	Current requirement for eligibility		Future requirement for eligibility
Prescribed Exam	<ul style="list-style-type: none"> • Complex requirements based on degree content and number of years in education and training. 	➔	<ul style="list-style-type: none"> • Simpler requirements based on qualifications that focus on architecture and meet ARB’s (UK) PPE requirements.
MRA	<ul style="list-style-type: none"> • As set out in each MRA. 	➔	<ul style="list-style-type: none"> • No change: As set out in each MRA.

Administration

- 6.18 ARB currently administers both the prescribed exam and the UK Adaptation Assessment. What this means in practice is described in Chapter Three above, and includes the employment of a small team that manages the examination process for candidates.
- 6.19 ARB sets the regulatory framework for the initial education and training in the UK and accredits qualifications that meet our requirements. ARB does not run qualifications directly. We believe that taking a similar approach to international routes would better reflect our core functions and would, in short, mean that we do what regulators do best, and other organisations with expertise and experience in assessment can do what they do best.
- 6.20 We believe that accrediting Prescribed Exams and UK Adaptation Assessments offered by third party organisations would improve the experience for candidates whilst upholding the integrity of the Register.**
- 6.21 ARB would develop a proportionate and targeted accreditation process for the new assessments as well as standards for third party examination bodies. Adapting the accreditation process we use for qualifications, we would set out our expectations for the assessments that need to be in place, and the standards by which we would accept and accredit third parties to design and administer them.
- 6.22 It is our hope that multiple third party organisations would seek accreditation, and that ARB would consider a range of assessment formats.** In the same way that different qualifications accredited by ARB are taught and examined in different ways, we are interested in hearing ideas about a range of assessment methods – and how they could be quality assured and accredited by ARB. This has the potential to offer candidates more flexibility and choice. This approach could cater to different learning, practice and communication styles and the impact they have on

examination performance. For example, some candidates may prefer oral examinations, and others written.

6.23 The table below summarises these outline proposals by comparing them to the current requirements.

	Current requirement for administration		Future requirement for administration
Prescribed Exam	<ul style="list-style-type: none"> Administered by ARB. 	→	<ul style="list-style-type: none"> Administered by a range of providers, all accredited by ARB.
MRA	<ul style="list-style-type: none"> Administered by ARB. 	→	<ul style="list-style-type: none"> Administered by a range of providers, all accredited by ARB.

Assessment

6.24 In Chapter Four above we acknowledged candidate feedback that the current assessment methodology used in the Prescribed Exam is complicated and subjective.

6.25 The learning providers ARB accredits to provide qualifications in the UK use a range of different assessment approaches that involved different formats. A scoping exercise undertaken for ARB suggested these formats include:

- Portfolios of different types of project work. This could include individual studio design projects, sometimes iterated over several years with progressive complexity, and co-authored or teamwork projects.
- Dissertations including written and visual materials.
- Knowledge assessments, e.g. closed book exams or multiple choice questionnaires.

6.26 It is our hope that multiple third-party organisations would seek accreditation, and that ARB would consider a range of assessment formats. This diversity of offering could be more inclusive by giving people the opportunity to choose a provider and assessment format best suited to them.

6.27 We are also interested in whether providers may need to deliver taught content to support adaptation in advance of any assessment of competence, particular where there may be significant gaps which go beyond UK context.

6.28 In addition to the competency assessment, we would like to introduce a simpler, knowledge-based online test. This assessment format could help to reduce bureaucracy and costs for candidates by acting as a gateway to a more comprehensive competence assessment.

6.29 **This standalone online component would apply to all internationally-qualified architects to ensure they're ready to practise in the UK and could replace the UK Adaptation Assessment.** It would perform the same function as the UK Adaptation Assessment, but in a simpler, more accessible and hopefully cheaper format.

6.30 The MRA development process already ensures that the education and training of qualified architects in signatory jurisdictions is equivalent to that of the UK. The UK Adaptation Assessment is designed to only test for the UK-specific elements that

would by definition not be gained by working or training in another jurisdiction. An online knowledge test would be a more proportionate format that would maintain the integrity of the Register whilst also meeting the Professional Qualification Act's intention of removing trade barriers for the profession.

6.31 The table below summarises these outline proposals by comparing them to the current requirements.

	Current requirement for assessment		Future requirement for assessment
Prescribed Exam	<ul style="list-style-type: none"> • Comparative matrix mapping document. • Supporting material (e.g. portfolios containing designed projects, technical essays). • Oral explanations with examiners. 	→	<ul style="list-style-type: none"> • Online gateway assessment of UK - specific knowledge and readiness to practise in UK context. • Competence assessment exercise. Formats to vary depending on provider, to increase options for candidates.
MRA	<ul style="list-style-type: none"> • Reflective career summary. • Professional interview based on written responses to UK-specific scenarios and related questions. 	→	<ul style="list-style-type: none"> • Online gateway assessment of UK - specific knowledge and readiness to practise in UK context.

Prescribed exam: For professionals with international qualifications (where there is no MRA)

Prescribed exam	Requirement for registration	Eligibility	Administration	Assessment
Current Prescribed Exam	<ul style="list-style-type: none"> Based on ARB's Criteria Two exams (Part 1 & /or Part 2) and an additional UK-accredited qualification (Part 3). Assessment of equivalent qualifications. 	<ul style="list-style-type: none"> Complex requirements based on degree content and number of years in education and training. 	<ul style="list-style-type: none"> Administered by ARB. 	<ul style="list-style-type: none"> Comparative matrix mapping document. Supporting material (e.g. portfolios containing designed projects, technical essays). Oral explanations with examiners.



Prescribed exam	Requirement for registration	Eligibility	Administration	Assessment
Future Registration Exam	<ul style="list-style-type: none"> Based on ARB's Academic and Practice Outcomes One single examination point. Assessment of equivalent competence and UK context-specific knowledge. 	<ul style="list-style-type: none"> Simpler requirements based on qualifications that focus on architecture and meet ARB's (UK) PPE requirements. 	<ul style="list-style-type: none"> Administered by a range of providers, all accredited by ARB. 	<ul style="list-style-type: none"> Online gateway assessment of UK - specific knowledge and readiness to practise in UK context. Competence assessment exercise. Formats to vary depending on provider, to increase options for candidates.

MRA: For professionals with international qualifications recognised in an MRA

MRA	Requirement for registration	Eligibility	Administration	Assessment
Current UK Adaptation Assessment	<ul style="list-style-type: none"> Based on ARB's Criteria. Proof of MRA-recognised qualifications and successful UKAA. 	<ul style="list-style-type: none"> As set out in each MRA. 	<ul style="list-style-type: none"> Administered by ARB. 	<ul style="list-style-type: none"> Reflective career summary. Professional interview based on written responses to UK-specific scenarios and related questions.



MRA	Requirement for registration	Eligibility	Administration	Assessment
Future UK Adaptation Assessment	<ul style="list-style-type: none"> Based on ARB's Academic and Practice Outcomes. No change: Proof of MRA-recognised qualifications and successful UKAA. 	<ul style="list-style-type: none"> No change: as set out in each MRA. 	<ul style="list-style-type: none"> Administered by a range of providers, all accredited by ARB. 	<ul style="list-style-type: none"> Online gateway assessment of UK-specific knowledge and readiness to practise in UK context.

Chapter Seven

Transition and Implementation

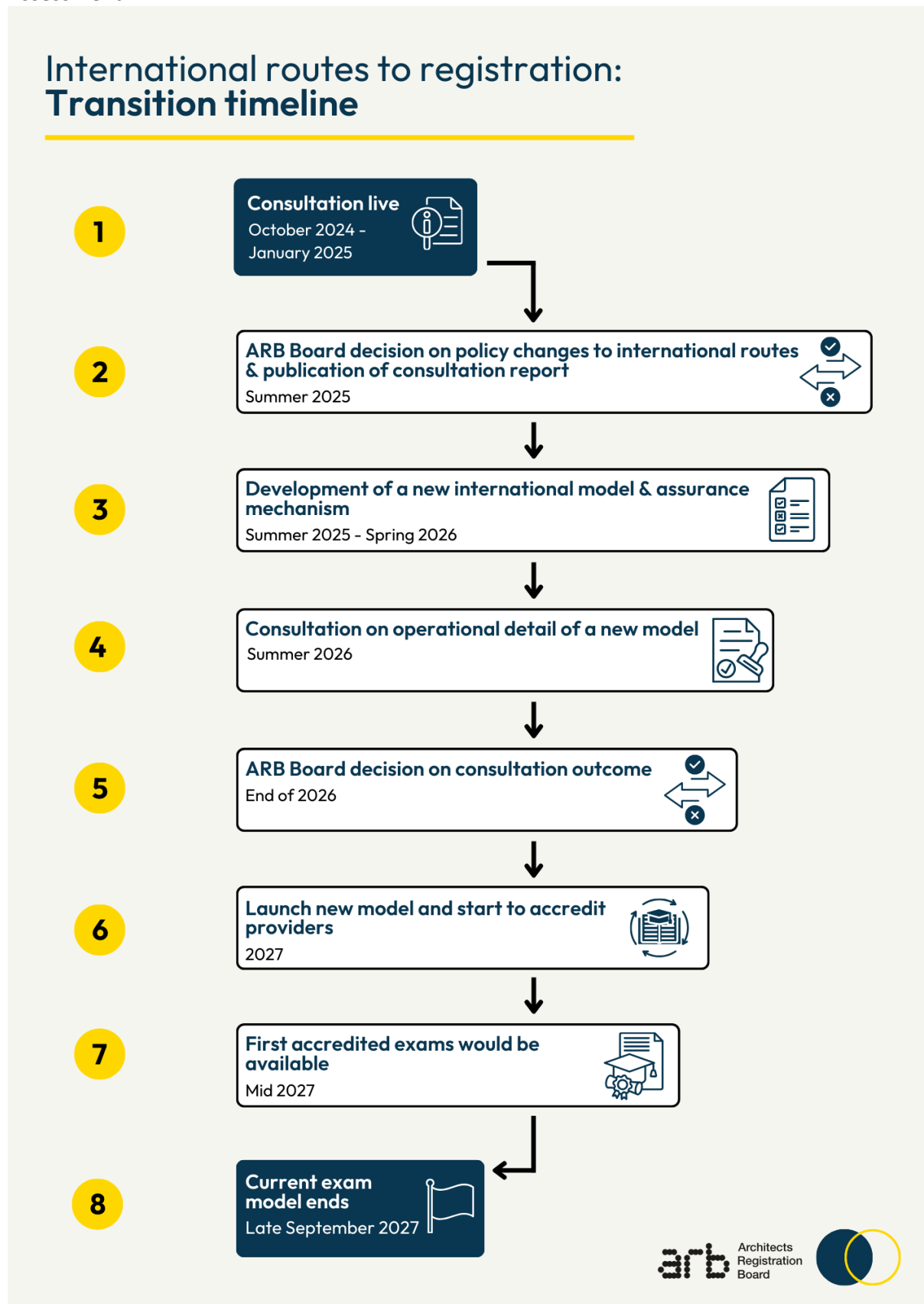
Timeline

- 7.1 At present we believe the current Prescribed Exam and UK Adaptation Assessment will need to be maintained until 2027.
- 7.2 Should we go ahead with the proposals set out in this consultation, we will need to prepare an accreditation model and start to accredit providers before the system can fully switch over to the new model. We predict that it could take one year to prepare the accreditation model and further time to consult on the Rules and procedures to implement it. We would need to take into account feedback about whether additional content may need to be delivered to applicants before they sit a competency assessment.
- 7.3 We will also need time to promote and explain it to new providers whilst they develop assessments, followed by a period of time in which to start accrediting providers.
- 7.4 The timeline below (Figure 7.1) is an estimate as to the earliest at which we will be able to introduce a new Prescribed Exam and UK Adaptation Assessment.

Mixed Qualifications

- 7.5 Our transition arrangements also need to consider candidates who may have a mixture of qualifications across ARB's outgoing Criteria-based education and training framework and the new one that is currently being introduced.
- 7.6 There will be candidates who have accredited Part 2s and Part 3s but no accredited Part 1; whilst our outgoing framework requires all three levels of qualification, our new outcomes-based model does not require an undergraduate degree in architecture. We have identified a small potential gap in the competencies covered for candidates in this cohort, and some form of adaptation as well as assessment may well be needed before they can register. This will need to be proportionate; we know of examples of candidates in this cohort who are experienced professionals who have been working in the UK for some time in senior positions.
- 7.7 We propose that we review and update the Competency Standards Group (CSG) as a registration route for such candidates, instead of the Prescribed Exam. The CSG will likely be remodelled and renamed as part of that review.

Figure 7.1: predicted timeline for changes to the Prescribed Exam and UK Adaptation Assessment



Competency Standards Group

- 7.8 The CSG currently carries out a desk-based assessment of individuals who have been off the Register for more than two years, examining their CV and other evidence to identify whether there are any competency gaps that would prevent them from registering. The current model is light touch and requires applicants to develop plans for CPD for the following 12 months, rather than demonstrating skills or experience.
- 7.9 The CSG will be updated to become a registration route for candidates who have mixed qualifications, both for those with a mix across our outgoing and incoming education and training framework, and those with a mix of (outgoing) UK and international accredited qualifications. The eligibility requirements for these candidates will have to be specific and apply to identified qualification mixes, so that it does not become a short cut to registration.
- 7.10 The CSG will continue to review those who return to (or rejoin) the Register after a gap of more than two years, and also assess any non-compliance with ARB's CPD scheme. Reviewing the CSG to undertake this collection of activities allows us to have a coherent group of experts to support assessments focused on one common need: demonstrating competency.
- 7.11 We will review the CSG processes and update them to ensure they can accommodate this new purpose, and are rigorous and repeatable.
- 7.12 We will also need to review the fee structure, which we will do after consultation, when we have more detail on how the new processes might work. This will need to be part of the Board's annual fee discussion and approval.

Costs and Resourcing

- 7.13 There will be changes to the resourcing requirements and costs of assessments if we develop and implement the proposals outlined in this paper. For example, we currently employ a staff team to administer the prescribed exam, including scheduling exams and checking eligibility requirements of candidates. We also employ a pool of examiners and assessors.
- 7.14 Under the new proposals, a staff team would instead accredit third party providers, and a reduced pool of examiners or assessors would be needed (to cater for other routes that are set by government legislation, for example with Switzerland). We will need to review and repurpose the Competency Standards Group and our pool of examiners, and we would need to consider whether any changes are needed to the role of the Accreditation Committee.
- 7.15 It is too early to predict the resourcing we need, when we have not yet started to draft the procedures and work required under our proposed approach. We do not anticipate an increase in staff, but we will revisit this assumption when we start to prepare the approach. If there are any efficiencies in our staffing as a result of changes to the exams and assessments approach, we would intend to redeploy colleagues to other strategic areas such as CPD – but we will need to continue working through the changes before we can be specific about this.

- 7.16 There is currently a cost for candidates each time they apply for the examination. The new cost would be set by accredited providers, but ARB would still need to recover the costs of the service (e.g. running the accreditation model).
- 7.17 We would need to ensure the costs set by providers were achievable for candidates as, unlike ARB, they would be individual businesses that are not restricted to a cost recovery model. This was an important piece of feedback from stakeholders: they were broadly in favour of the outline changes but cautioned us against accrediting providers who would seek to make such profits from the exam that it became unaffordable for candidates.
- 7.18 Whilst we cannot predict the costs until we are in discussion with potential providers, we will aim to keep the overall fee for Prescribed Exam candidates – including both the provider’s costs and ARB’s accreditation costs – proportionate. There would be financial savings for many candidates should we go ahead with our proposal to set one single assessment gateway rather than, as at present, require candidates to pass separate exams to demonstrate their competency across multiple qualifications. We believe the fee for UK Adaptation Assessment candidates – again, including both the provider’s costs and ARB’s accreditation costs – has the potential to be reduced by moving to an online format, by cutting down on the time taken by assessors.

Chapter Eight

Consultation and Next Steps

We would like to know your views on the new regulatory approach that we have outlined in this paper. Our objectives in proposing these changes are to align our international routes with our new approach to UK initial education and training, and to improve access to the UK Register by simplifying the examination process and removing unintended complexity and barriers. We want to understand whether our proposals will achieve those objectives, and your views will help us understand the potential impact of our proposals and how they can be improved.

We are running a transparent public engagement exercise online and invite responses from anyone who is interested. It is important that you complete the survey online through the link provided below. This will help us to analyse responses effectively, and understand and compare any key trends across different stakeholder or demographic groups. We cannot commit to analysing any responses received outside the online survey platform.

The consultation will close on **Monday 6 January 2025**. After that point, responses will be analysed and we will consider what further changes can be made to our proposals to improve them. We will discuss our analysis and suggestions with the Board and publish their response and decisions in 2025.

You can find all open ARB consultations including this consultation online at arb.citizenspace.com.

In addition to some standard gateway questions to help us identify who is responding and how we can use the data they share, our consultation includes the following questions:

To what extent do you agree with each of our proposed changes to the Prescribed Exam?

- Competence-based assessment
- Single gateway
- Improved eligibility
- Accredited providers
- Modern assessment format

Please explain your response

To what extent do you agree with each of our proposed changes to the UK Adaptation Assessment?

- Competence-based assessment
- Accredited providers
- Modern assessment format

Please explain your response

**Do you think there will be interest from learning providers and those with expertise in assessment becoming providers of ARB-accredited international assessments?
Please explain your response.**

Do you have any views on whether ARB should aim to accredit a range of assessment methodologies, or one single assessment methodology?

We have heard that candidates may benefit from taking courses to help them prepare for the assessments. Do you have any views on this including, for example, views on how they could be delivered?

**We have suggested a desk-based assessment through a redeveloped 'Competency Standards Group' for candidates with mixed types of qualifications (see Chapter Seven of our paper, 'Mixed Qualifications'). To what extent do you agree with this approach?
Please explain your response**

Is there any feedback you wish to give about a positive or negative impact on equality, diversity and inclusion within our proposals? We have published a draft Equality Impact Assessment on our consultation site at arb.citizenspace.com.

Is there any other feedback you would like to share about our proposals?

Would you like to be kept informed of the outcome of this consultation and related work at ARB?

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