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| logo-black | **Date**  **Agenda Item** | **21/7/2021**  **6** |

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| **Subject** | **Criteria Guidance to Institutions** |
| **Status** | **Open** |
| **Purpose** | **For decision** |
| **From** | **Simon Howard, Director of Regulation**  **Rebecca Roberts-Hughes, Director of Policy and Communications** |
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| **1.** | **Summary** | | |
| Following the publication of ARB’s Strategic Statements on Fire & Life Safety Design and on Climate Change & Sustainability, the Board resolved to issue guidance to institutions seeking prescription and/or offering ARB prescribed qualifications which sets out our interpretation of the Criteria for the Prescription of Qualifications at Parts 1, 2 and 3.  That Guidance was issued for consultation, and the Board is now invited to consider the consultation responses and decide on whether the updated Guidance should be issued. | | |
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| **2.** | **Recommendations** | | |
| It is recommended that the Board: | | |
|  | 1. Notes the consultation report at **Appendix A** 2. Approves the Guidance to Institutions on Sustainability at **Appendix B** and on Fire & Life Safety Design at **Appendix C** with the changes identified following consultation 3. Makes that Guidance effective from 1 September 2021 4. Monitors compliance with the Guidance through its existing prescription processes | | |
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| **3.** | **Terms of Reference** | | |
| The Architects Act 1997 states the following:  *Section 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 in Part 1 of the Register; if*   1. *he holds such qualifications and has gained such practical experience as may be prescribed; or* 2. *he has a standard of competence which, in the opinion of the Board, is equivalent to that demonstrated by satisfying paragraph (a).* | | |
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| **4.** | **Contribution to the Board’s Purpose and Objectives** | | |
| In delivering the Act, ARB’s objectives are: | | |
| Protect the users and potential users of architects’ services by ensuring that future architects are competent to practice in a way that mitigates environmental impact and supports the safety of buildings and their occupants | | |
| Support architects through regulation by ensuring that future architects have the competencies on point of registration to meet the expectations of clients and contribute to a safe, sustainable built environment | | |
| **5.** | **Key Points** | | |
|  | | In 2020 ARB identified two areas of critical importance to architects that required a regulatory intervention: the impact of climate change on the environment, and building design in relation to fire and life safety. |
|  | | The Board published two strategic statements in respect of these issues. The statements set out how ARB would be reviewing the competence requirements for architects and future architects, but acknowledged that such a comprehensive review would - quite properly - take some significant time. The Board resolved that it would, in the meantime, issue guidelines to the profession on these areas of architectural practice, and provide guidance to institutions as to how the Criteria at Parts 1, 2 and 3 will be interpreted for the prescription of qualifications. |
|  | | A draft of the Guidance for institutions was issued for consultation by the Board at its December 2020 meeting. It is important to note that the Guidance does not purport to change the existing Criteria for the Prescription of Qualifications, but is supplementary direction as to how the General Criteria and Graduate Attributes at Parts 1 and 2 and the Professional Criteria at Part 3 should be interpreted. |
|  | | The content of the Guidance has been based on the outputs from the working groups established in 2020, which included subject matter experts and the professional bodies, who already produce their own CPD material in these areas. |
|  |  | | Before launching the consultation, we developed the Guidance with detailed input from subject matter experts and the professional bodies. We also had feedback from the Standing Conference of Heads of Schools of Architecture (SCHOSA) to help us understand better the impact of the Guidance on institutions and any practical implications. The consultation built on that engagement to formally invite feedback from anyone with an interest in the Guidance, particularly individual institutions. |
|  |  | | The Guidance reflects the guidelines ARB has already issued to registered architects. The core content remains broadly the same for those seeking registration, but adapted for an educational context.  Consultation |
|  |  | | The draft consultation report is at **Appendix A**. When the Guidance is due to be published, the consultation report will be updated and prepared for publication at the same time. The purpose of the consultation report is to:   * transparently share stakeholder feedback received through the consultation exercise; * demonstrate that we have listened by documenting what we learned and how we have addressed it in the updated Guidance; * act as an evidence base that supports the final version of the Guidance. |
|  |  | | The consultation exercise ran from 25 February to 23 April 2021. It was primarily targeted at institutions that offer ARB-prescribed qualifications, and secondarily at architects, students, and relevant organisations. Direct emails were sent to more than 60 institutions, with a follow up email from the Chief Executive ahead of the consultation deadline. It was launched through a dedicated article in the February eBulletin sent to 43,035 architects, on our online social media channels, and through an interview with the Chief Executive in the Architects Journal. It was also sent to all the professional architecture institutes and raised in ARB’s quarterly meetings with them. |
|  |  | | We received 48 responses to our consultation. These included 15 responses on behalf of organisations, including climate action groups. The majority of respondents were architects; 73% were registered architects, including those who are also academics. Full analysis about who responded is available in Chapter two of **Appendix A**. |
|  |  | | Key findings from the consultation include:   * 43% of respondents thought the Fire and life safety design Guidance was clear and 16% thought it wasn’t clear. There were very few recommendations made to improve the clarity of the Guidance. * 40% of respondents thought the Sustainability Guidance was clear and 23% thought it wasn’t clear. Recommendations made by respondents to improve the clarity included:   + Sustainability is a broad requirement that should be applied to all aspects of buildings and their design.   + Sustainability requires a more fundamental change in the approach to education.   + The Guidance should be more specific about the requirements and should go so far as to set targets for the skills and understanding of architects. * The majority (69%) of respondents agreed that we should begin incorporating the Guidance into our prescription process from September 2021. * We proposed that we check progress of implementation through our annual monitoring process, and the majority (85%) of respondents agreed with our proposal.   Full findings are detailed in Chapter Three of **Appendix A**.  Recommendations |
|  |  | | The two Guidance documents have been updated to address some of the suggestions made by respondents. In Chapter Four of **Appendix A** we explain which suggestions we are adopting, and offer a rationale on those that we are not. While there may never be complete unanimity over the wording of such guidance on what are diverse areas of architectural practice, the Board can have confidence that there is a general understanding of the content from those responsible for delivering it. |
|  |  | | We have heard the concerns of the institutions as to the challenges they will face in delivering on the content of this Guidance. Because of that we are recommending an approach that will require a commitment from the institutions, but provide them with the flexibility to deliver in a way that is proportionate to their current capabilities. That approach is to allow institutions time to plan for how they implement the Guidance, and monitor the progress of implementation through our existing prescription processes. While the Guidance will be effective once we have had the opportunity to publish and send to institutions, we anticipate that the early responses we will receive will be limited to an explanation of the arrangements currently in place, and what the plans are to achieve full compliance. |
|  |  | | While ARB will retain regulatory powers to deal with those institutions that are unable or unwilling to deliver the content contained within the Guidance, the purpose of this policy is to encourage consistent, high-quality courses that meet the Criteria in these important areas. We believe that this can best be delivered through the existing prescription process, where institutions demonstrate compliance through their annual monitoring returns, and applications for new and renewed qualifications. |
| **6.** | **Resource Implications** | | |
| Consideration of this additional material will inevitably lead to a greater workload for the Executive, Prescription Committee and the Board. We anticipate in the first year for that impact to be negligible, and are currently considering wider reforms of the prescription process that will minimise the resource required to consider annual monitoring and applications for new and renewed qualifications in future years. | | |
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| **7.** | |  | | --- | | **Risk Implications** | | This remains a high-profile area of significant risk. There will be a great deal of scrutiny over any changes to regulatory policy. The Guidance must be capable of making a positive difference to the consistency of competence of architects entering the Register, but also be deliverable by the institutions. Placing requirements on institutions that fall outside the published Criteria will leave ARB vulnerable to challenge.  These risks will be mitigated by the Board being able to show that it has taken into account a wide range of views before reaching a decision. | | | |
| **8.** | **Equality & Diversity Implications**  An Equality Impact Assessment has been carried out and is at **Appendix D**. No adverse implications of this policy have been identified. There may be positive implications to certain groups in the future if this guidance can contribute in some way to a safer, more sustainable built environment. | | |
| **9.** | **Communication** | | |
| When the Guidance is approved and ready to be issued, it will be published on ARB’s website along with the updated consultation report. The aims of the communication activities will be to:   * make sure that anyone who needs to implement the guidance is aware of its introduction; * achieve the purpose of the consultation report as set out at point 5 (vii) above, and; * promote the review of initial education and training, and encourage involvement in the engagement activities scheduled for later this year.   The target audiences are the same as those of the consultation, at point 5 (viii) above.  Both the report and the Guidance will be published and directly emailed to all institutions offering ARB-prescribed qualifications, along with additional information about implementation, as set out in the recommendations above. Respondents to the consultation were asked whether they would like to be kept informed; 92% agreed and they will be sent a dedicated email confirming the outcome of the consultation and the Guidance. The documents will be shared with architects through the eBulletin, our social media channels, and via a news release to the trade press, and raised in relevant stakeholder meetings. | | |
| **10.** | | **Further Actions**  Subject to the Board’s agreement, the Guidance will be issued to the institutions seeking or offering prescribed qualifications, and the appropriate changes made to ARB’s internal procedures. ARB staff will be made available to answer any queries arising from the guidance. | |