

Board paper

for Open session

Subject:

Consultation on ARB's International Routes to
Registration

Board meeting:

10 September 2024

Agenda item:

7

Action:

- For noting
- For discussion
- For decision

Purpose

To agree to consult on changes to ARB's international routes to registration incorporating major changes to the Prescribed Examination and associated changes to the UK Adaptation Assessment.

Recommendations

The Board is asked to:

- i. Agree to publish proposals for major changes to ARB's international routes to registration (in the paper at **Annexe A**) for consultation.

Annexes

Annexe A – International Routes to UK Registration for Architects: Consultation on a new approach

Annexe B – Equality impact assessment on proposed changes to international routes

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1. Open Session

- 1.1. This item is being taken in the open session. The Annexes will not be published as part of the papers. This is to avoid confusion by publishing only one document for consultation, as changes may be made to the document as a result of the Board's discussion.

2. Background and Key points

- 2.1. ARB accredits the UK qualifications required for registration as an architect, and also creates routes to registration for applicants with international qualifications. We must ensure that standards of competence are maintained however professionals join the UK Register, to fulfil our fundamental duty of protecting the public.
- 2.2. At its July 2024 meeting the Board discussed potential changes to ARB's international routes to registration.¹ The Board reviewed evidence including a survey of international architects and a listening event with international candidates for registration. The Board discussed a suite of potential changes to ARB's prescribed exam, and to the UK Adaptation Assessment (the assessment component of ARB's Mutual Recognition Agreements).
- 2.3. The changes the Board discussed aim to align our international routes with our new approach to UK initial education and training, and improve access to the UK Register by simplifying the examination process and removing unintended complexity and barriers.
- 2.4. Following the Board's feedback in that meeting, a consultation paper has now been drafted (**Annexe A**). The paper sets out:
 - ARB's regulatory role;
 - our current approach to the Prescribed Exam and UK Adaptation Assessment;
 - the evidence and rationale for change;
 - the nature of the changes we intend to propose;
 - transition plans; and
 - the consultation questions we intend to ask.
- 2.5. In summary, the changes outlined in the consultation paper are:

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).

¹ The paper discussed at the July 2024 Board meeting is available here: <https://arb.org.uk/wp-content/uploads/9.-July-Board-meeting-draft-Item-9-Cover-Sheet-International-Routes-to-Registration.pdf>

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 a range of assessments 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 exercises for ARB to accredit. The formats of the assessment exercises could vary depending on the provider, to increase options for candidates.

- 2.6. We would like to publish the paper at **Annexe A** for public consultation, along with the impact assessment at **Annexe B** to help inform responses.

3. Resource Implications

- 3.1. The changes we anticipate to resourcing requirements and costs were set out in the July Board paper and are also covered in the consultation paper at Annexe A.
- 3.2. In summary, there will be some resourcing changes if we move to an accreditation model. 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. We do not anticipate an increase in staff headcount but will be in a better position to review this once we start developing the new assessment model, should we go ahead with the proposals in this consultation.
- 3.3. The same applies to the fee for candidates: we do not intend for the costs to candidates to increase as a result of these proposals but we will not be able to model the potential costs until we start to operationalise the policy changes recommended in this consultation.
- 3.4. Should we proceed with the changes we are proposing, we would undertake a detailed modelling exercise and return to the Board for their decision on the full

resource implications. The assessment model would also be subject to a consultation, as it would entail changes to our Rules to implement.

4. Risk Implications

- 4.1. The extensive changes we are proposing amount to a complete overhaul of the prescribed exam. There are risks associated with such fundamental changes to one of our regulatory roles and services, which are captured in a risk register as part of our project management. These risks were outlined in the July 2024 Board paper and have not changed.²
 - 4.2. The project team maintains a risk register and will keep all risks under review.
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5. Communication

- 5.1. We have started to engage stakeholders in this project and will continue to build upon this foundation when we publish the consultation paper.
 - 5.2. We intend to consult for three months to give stakeholders ample time to review and gain an understanding of the changes we are proposing to this complex area of regulation. We will publish the consultation this autumn and close it in early 2025.
 - 5.3. We will promote the consultation to learning providers, examiners, recent and potential candidates, our international MRA partners, and architects who may employ or work with internationally qualified professionals. This will include a direct email to relevant stakeholder contacts, and we'll ensure it is included in ARB Insight so that architects are aware. We will also promote it on our website and through our digital channels.
 - 5.4. One of the consultation questions seeks to gauge interest from stakeholders who may wish to seek accreditation for the new assessments they could offer in the future. The consultation is therefore an important first step in promoting the potential model and inviting engagement with potential providers.
 - 5.5. We have received stakeholder feedback that this is a complex area of ARB's work that is susceptible to jargon. We will test some of our consultation messaging and materials with stakeholders prior to publication. This may result in some minor changes to the consultation paper, which we would invite the Board to delegate final approval to the Chair and/or Chief Executive.
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² The paper discussed at the July 2024 Board meeting is available here: <https://arb.org.uk/wp-content/uploads/9.-July-Board-meeting-draft-Item-9-Cover-Sheet-International-Routes-to-Registration.pdf>

6. Equality and Diversity implications

- 6.1. One of the guiding principles for our overhaul of the prescribed exam is 'fairness and inclusivity'. Having heard at our stakeholder listening event that the exam is experienced as unfair and stressful, we believe change is needed to create an accessible exam that mitigates against bias. A new, better exam could help to diversify the makeup of the profession so that it better reflects the makeup of society, whilst upholding standards and protecting the public.
 - 6.2. We have conducted an equality impact assessment (**Annexe B**) which we intend to publish as part of the public consultation, to invite feedback on our assumptions.
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7. Recommendations

The Board is asked to:

- i. Agree to publish proposals for major changes to ARB's international routes to registration (in the paper at **Annexe A**) for consultation.

Annexe B - Equality impact assessment

Name of policy	International Routes to UK Registration for Architects		
Summary of the policy and its aims	<p>The policy proposes changes to ARB's Prescribed Exam and UK Adaptation Assessment.</p> <p>ARB recognises, or 'accredits', 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 are proposing to overhaul our international routes to UK registration to align them with our new approach to UK education and training, and to improve access to the UK Register by simplifying the examination process and removing unintended complexity and barriers.</p>		
Date of this assessment	22 August 2024		
What approach is being taken to consultation or engagement?	<p>The consultation will be open for 3 months. Respondents will be able to respond through our public Citizen Space consultation platform.</p> <p>The consultation has followed previous engagement, including a listening event with stakeholders from a range of backgrounds who have experience of the current route and a survey of internationally qualified architects.</p>		
Is the policy likely to have a <u>negative</u> impact on any particular demographic or group with a protected characteristic, <u>more than it does for other groups</u> ?			
	YES	NO	If YES, what is the likely additional impact?
Age		NO	
Disability		NO	
Gender reassignment		NO	
Marriage and civil partnership		NO	
Race		NO	We do not expect a direct negative impact but we recognise that the policy mostly applies to non-UK qualified professionals. There is a risk changes may produce anomalies

			which could therefore have a disproportionate negative effect on certain groups. We will aim to identify and avoid these, informed by the consultation, so would welcome stakeholder feedback of any potential negative effects.
Religion or belief		NO	
Sex		NO	
Sexual orientation		NO	
<p>Any further comments on how the policy may:</p> <ul style="list-style-type: none"> • advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it • foster good relations between persons who share a relevant protected characteristic and persons who do not share it • reduce inequalities of outcome that result from socio-economic disadvantage 			
<p>One of the aims of this policy change is to improve access to the architects' profession in the UK. If the architects' profession is drawn from and representative of different types of communities and lifestyles, it will be better equipped to design environments for different types of communities and lifestyles. We therefore believe our proposals will have a positive impact on equality, diversity and inclusion in the built environment, and for everyone in our society who uses designed buildings, spaces and places.</p> <p>The policy mostly applies to professionals with international qualifications in architecture. Therefore, any benefits from the proposed changes would also be more greatly experienced by that group. For example, currently 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. This would be improved as part of the proposals.</p> <p>One of the guiding principles for our overhaul of the prescribed exam is 'fairness and inclusivity'. Having heard at our stakeholder listening event that the exam is experienced as unfair and stressful, we believe change is needed to create an accessible exam that mitigates against bias. A new, better exam could help to diversify the makeup of the profession so that it better reflects the makeup of society, whilst upholding standards and protecting the public.</p> <p>As part of the proposals, it is our hope that multiple third party organisations would seek to offer accredited examinations, and that they would offer a range of assessment formats. In the same way that different qualifications accredited by ARB are taught and examined in different ways, we think that a range of exam providers offering a range of assessment methods – all quality assured and accredited by ARB – would offer candidates more flexibility and choice. This approach would cater to different learning, practice and communication styles. For example, some candidates may prefer oral examinations, and others written. This diversity of methods could have a positive impact towards candidates with disabilities or those whose first language is not English.</p>			
When is the policy expected to be implemented?	Q3 2027		

	YES	NO	If YES, when will this be carried out?
Does this impact assessment need to be reviewed later?	YES		This impact assessment should be reviewed if the policy substantially changes following consultation.