

# Consultation outcome - Changes to PPE requirements

for Open session

Board meeting:

22 July 2026

Agenda item:

8

Action:

- For noting ☐
- For discussion ☐
- For decision ☒

Subject:

Outcome of the consultation on improvements to professional practical experience and the next steps

## Purpose

This paper summarises the outcome of the consultation on improvements to professional practical experience. It includes updated proposals following the consultation and asks the Board to approve the new proposals for implementation.

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## Recommendations

It is recommended that the Board approves:

- i. Updates to the Standards for Learning Providers
- ii. New guidance for employers and for trainees
- iii. Minimum requirements for a Trainee Record of Experience and accompanying advice topics
- iv. Updated Registration Rules

The Board is asked to approve the policy position and final proposed wording in the annexes, noting that the Accreditation Handbook will be updated consistently with these decisions.

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## Annexes

Annexe A – Consultation analysis report

Annexe B – Updates to ARB’s Standards for Learning Providers

Annexe C – Updated guidance for practices employing trainees and for trainees undertaking professional practical experience

Annexe D – Updated minimum requirements for a Trainee Record of Experience and topics for supplementary advice

Annexe E – Updated changes to ARB’s Registration Rules

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### 1. Open session

- 1.1 This item is being taken in open session. The annexes are provided to the Board for decision but will not be published with the open-session papers at this stage, because they remain draft implementation documents subject to the Board’s decision and final publication checks. Final versions will be published following approval.

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### 2. Background and Key points

- 2.1. ARB ensures only those who are suitably competent are allowed to practise as architects. To help achieve this, we accredit the architecture qualifications required to join the Register of Architects. Qualifications must deliver our Competency Outcomes to be accredited by ARB, and we also set Standards that learning providers must meet. The Standards are supplemented by an Accreditation Handbook, with more detail about how learning providers can meet the requirements we set.
- 2.2. Our education framework includes requirements for trainees to have undertaken Professional Practical Experience (PPE) before they are able to qualify and practise as architects. In addition to the qualifications needed to register, there is currently a requirement that individuals must have a minimum of 24 months of professional practical experience, with some stipulations about how and where that experience took place.
- 2.3. The Board has long acknowledged the challenge it faces in not having regulatory power to oversee work experience which is ‘on the job’ employment rather than

formal structured training. Nor is there any likelihood that there will be a nationally funded training programme which exists in other professions.

- 2.4. Over the last five years ARB has undertaken a programme of reforming the initial education and training of architects. A consistent message throughout that process has been that there are fundamental problems relating to PPE. This concern has been shared anecdotally over many years. There is compelling evidence about problems in the quality of work experience, variability in experience and in a significant minority of cases, the poor employment conditions and treatment of trainees. Combined, feedback indicated that this contributes to sub-optimal outcomes and in some cases discrimination.
- 2.5. In 2024 ARB appointed an independent Commission to provide recommendations on how PPE could be improved, recognising that the formal levers we have as the regulator are limited. In early 2026, ARB launched a consultation on the implementation of the Commission's recommendations. In summary, these proposals were that:
  - Learning Providers must assume a co-ordinating role in facilitating trainees' access to good quality PPE, implemented through changes to ARB's Standards for Learning Providers and Accreditation Handbook
  - Minimum requirements be set for a standardised 'Trainee Record of Experience', required for all trainees to record and measure their progress against the Practice Outcomes
  - Guidance on the responsibilities of trainees and those employing trainees in the context of PPE be published
  - Changes to ARB's Registration Rules, including that the separate two-year minimum period of PPE be removed and replaced by an outcomes-based approach, under which practical experience is assured through accredited qualifications, provider oversight, the Practice Outcomes and the Trainee Record of Experience
- 2.6. At its May meeting, the Board received an initial update on the responses to the consultation. This gave an overview of where there was support for the proposals and where there was concern. We have since fully analysed the consultation responses and used both this and other discussions to prepare proposals we would now like to implement.
- 2.7. The consultation did not show simple consensus. In particular, more respondents disagreed than agreed with the proposed changes to the Standards for Learning

Providers and the Registration Rules. However, the objections were concentrated on implementation risks, clarity, burden and assurance, rather than a rejection of the overarching principles and commitment to improving PPE. We have therefore revised the proposals to reduce prescription, clarify responsibilities and strengthen the assurance model, while retaining the policy aim of moving away from time served as the main proxy for competence.

## **Consultation**

- 2.8. The consultation was open between 15 January and 15 April 2026. During that time, we received 87 responses. Most (61, 70%) were registered architects and 31 of these (36% of the total respondents) were also academics. We also heard from trainees at different stages and others who are not yet fully qualified (16, 18%). The highest group of respondents was from London and the South East (34, 39%) but a breadth of locations meant we obtained views from different nations and regions.
- 2.9. During the consultation period, we undertook visits to learning providers and employers, as well as took part in online webinars as part of our normal work. While these were not consultation events with structured feedback, we were able to highlight the proposals and the consultation to over 500 individuals and receive informal feedback. These events included:
- Talks to trainees at seven learning providers, where we shared information about the proposals and encouraged attendees to respond to the consultation. During these we spoke to over 350 trainees.
  - Further webinars and events organised by APSA and the Association of Architectural Educators, where we spoke to around 100 people.
  - Talks to practices and an HR network, where we were able to update around 100 professionals on the consultation and to encourage them to respond.

## **Consultation feedback**

- 2.10. A full analysis report of the consultation is at Annexe A. A summary of the key themes is below.

### **Draft Standards for learning providers**

- 2.11. We proposed that learning providers should take a coordinating role in facilitating trainees' acquisition of all the Competency Outcomes. The proposed new Standard for the role was an update to 'Standard 6 – Student Support'. We also published proposed updates to the Handbook to provide more information to respondents about how providers would need to meet the new Standard.

2.12. The most common response was neither agree nor disagree (22, 25%) but more respondents disagreed<sup>1</sup> (35, 40%) than agreed (30, 34%). In the open text responses, we found many had indicated disagreement because they had concerns about particular parts of the proposals rather than the role in principle. It was clear there were some areas of significant concern about the details of the role that we proposed including:

- Providers being asked to maintain a list of employers and how they should determine whether those employers are suitable. This included worries about how they would do this when experience can vary between trainees and over time.
- The resource requirements on providers and how these requirements might affect future provision of accredited qualifications.
- Compatibility with the role of providers, such as potential liability from decisions they make and whether the requirements were asking them to go beyond their remit. This included misunderstandings that they would have to offer specialist employment advice. It also included some concerns about transferring elements of assurance responsibility from ARB as the regulator to providers.

### **Guidance for employers and for trainees**

2.13. We published draft guidance to both employers and trainees. The guidance would advise on the expectations of both groups during periods of employment. It would also provide clarity about who is responsible for supervision. As part of their coordinating role, learning providers would need to make trainees and employers aware of this guidance, and as such this material could be used by them to support their trainees. We also wanted to use it to reduce the burden placed on providers, as the guidance would be produced by ARB, whilst also helping to standardise the information trainees and employers receive.

2.14. We asked respondents whether they agreed with the content of both pieces of guidance. Respondents agreed with the proposals: 50 (57%) for the guidance for employers and 54 (62%) for the guidance for trainees. Recurring themes in the free text responses were:

- Concern that the guidance might limit access to professional practice, such as through employers being unable to offer training that met the guidance.

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<sup>1</sup> Respondents were able to choose strongly agree, agree, neither agree nor disagree, disagree, or strongly disagree. We have combined agreement and disagreement to help illustrate the sentiment of the responses. The full consultation report includes more detailed results for each question.

- Requests for clarification where at least one part of the guidance was unclear.
- Suggestions for us to consider, including specific wording and additions.

### **Trainee Record of Experience**

2.15. Our proposed changes to the Standards and Handbook included that learning providers should use an ARB approved Trainee Record of Experience to individually advise trainees on their progress. The consultation asked for views on minimum requirements for the Record. These are the requirements that a Record would need to meet for ARB to approve its use by learning providers. Responses to these requirements were positive, with 42 respondents (48%) agreeing and only 15 (17%) disagreeing.

2.16. We also proposed topics for advice that would accompany the Record and asked whether respondents thought these would be helpful. These were advice on how to complete the Record, examples of experience that supports the Outcome and advice for learning providers on how to use the Record to support trainees. Responses to all of these was positive, with most respondents finding each very helpful.

2.17. Common themes across the open text responses included:

- Respondents saying at least one part of the proposals was unclear, including how it differed to existing systems of recording progress.
- Views that the provision and expectation of a Record was not within ARB's remit.
- Specific suggestions for the Record, including further advice topics to support it.

### **Registration Rules**

2.18. The Registration Rules set out ARB's policies and process relating to registration matters, such as how qualified individuals can become registered for the first time. We proposed changes to these, with the main one being the removal of the requirement that applicants for registration have at least two years of practical experience.

2.19. In doing so, the 'double counting rule' would also be removed. This is an ARB policy that prevents trainees from using time spent in practice which contributes to the achievement of academic credits to also count that same time towards the minimum two years. Feedback has been that it inhibited some qualification formats. With no minimum time to count towards, this would no longer be an issue.

2.20. The most common response was neither agree nor disagree (24, 28%) but more respondents disagreed (39, 45%) than agreed (24, 28%). Common themes respondents shared within the open text responses were:

- Concern that the change would lower standards of the profession.
- Concern about the perception it would give trainees of the time required and therefore their expectations of how long their training would take.
- That time in practice was itself a valuable measured outcome.
- That the minimum time helps employers to structure experience and manages their own expectations of trainees.

### **Other questions – EDI, support trainees, transition**

- 2.21. We explained that the coordinating role for learning providers, the Trainee Record of Experience, and the guidance for both trainees and their employers are all intended to provide additional support for trainees. We then asked respondents whether they agreed that the proposals would help trainees navigate their progress towards registration. The most common response was neither agree nor disagree (32, 37%) but more respondents agreed (30, 34%) than disagreed (25, 29%). We have also considered their free text comments that explained their views.
- 2.22. We asked respondents if they had any feedback about a positive or negative impact of equality, diversity and inclusion within any of our proposals. There were no significant concerns, but we have been able to consider their views.
- 2.23. The consultation proposed that any changes would be phased in alongside new accredited qualifications as part of our transition, which will see all qualifications meet the Competency Outcomes (rather than the outgoing Criteria) by December 2028. We asked respondents if they had any feedback on these plans. We received both suggestions for what the transition could be and things we should keep in mind as we decide it.

### **New proposals**

- 2.24. We have carefully considered the consultation feedback and the specific suggestions we received for how we could improve the proposals. After analysis of the feedback received, we then tested proposed amendments in meetings with a number of providers and experts. This enabled us to judge whether the proposed mitigations would be effective..
- 2.25. Improvements we have made to the proposals in each area are summarised below. Annexes B to E are updated versions of each proposal document. Annexe B on the Standards includes the consultation material (the Standards and Handbook information we included) and then a separate new section on proposed updates to the

Standards that the Board is being asked to consider. We have then described the changes we will make to the Handbook in the section below.

### **Draft Standards for learning providers**

- 2.26. It remains our view that learning providers have a crucial role because of their oversight of the educational process, their relationship with trainees, their ability to address specific gaps in learning as part of the qualifications they provide, and the potential for them to develop links with employers. The small numbers raising a principled opposition to this also gives us confidence in this view.
- 2.27. While resource concerns are consistent with issues identified during earlier policy development, they remain relevant to implementation planning as the new PPE framework is introduced alongside the transition to outcomes-based qualifications.
- 2.28. We want to retain the principle of a key role for learning providers but with some important changes to make them achievable and to ensure they have the positive impact we want.
- 2.29. It is not an intention of our policy to expect providers to act as quasi-regulators of employers. Instead, the proposals should be proportionate and clearly aligned with education provision rather than employment oversight. We have updated the proposals to reinforce this, and make clear that they will not be required to hold a list of 'approved' employers.
- 2.30. In reconsidering what we do, we have reflected on the aims of the work and used it as an opportunity to reframe this part of the Standards and Handbook requirements to:
- Focus less on setting prescriptive requirements for all practice qualifications as we had done in the consultation proposals.
  - **Reinforce the good things we would like providers to be doing across all qualifications:** individualised oversight of progression, supporting employability, helping trainees understand routes and how practical experience fits into this.
  - **Keep some essential things we expect of practice qualifications:** using a Record, maintaining contact with enrolled trainees during their time in employment, assisting them with concerns or referring them to others, and sharing our guidance.
  - **Giving examples of how providers could further demonstrate meeting the overall Standard expected.** This is where we have included some updated versions of the requirements in the original proposals. The examples include building relationships with employers, helping trainees find opportunities, giving



them advice about suitability (by using the characteristics in our guidance and considering whether it is somewhere the trainee can meet the Outcomes).

2.31. In addition to these reframing changes, we have also:

- Emphasised that the guidance for employers and for trainees is a source of consistent ARB information on the suitability of an employer, and that providers can therefore use the guidance to share this information with all of their trainees more easily. The providers we spoke to wanted us to emphasise this.
- Reiterated that in circumstances where a trainee is struggling to get the experience they need, the learning provider should have a strategy for support and guidance on alternative options to give them the best possible opportunity to complete their qualification. We do not think we can require more than this from providers.

2.32. The outcome of these changes should be more support across the whole of a trainee's qualification route but with more flexibility over how providers do this. We have tested these changes with a small number of providers and feedback has been positive.

#### **Guidance for employers and for trainees**

2.33. We would like to proceed with the guidance and have used the feedback to make improvements to it. The changes include:

- Adding more information to trainees about practical experience, ARB's requirements and what they can expect of their employer and learning provider.
- Mentioning the role of learning providers more prominently to help align expectations across providers, employers and trainees.
- Reminding employers that trainees may be balancing academic and work demands on their time, and to be mindful of occasions where they may need time away from work for academia.
- Emphasising the importance of supervision as a concept being in place, and that there are circumstances where a range of professionals could provide oversight during a trainee's practical experience.
- Making the Trainee Record of Experience and its expected use more prominent, strengthening our expectations on its prompt completion and clarifying our recommendation that experience should be corroborated by a registered architect.

- Adding a section for trainees on what support might be available to them if they are unable to gain the experience they need.
- Highlighting our own mentoring guidance as a reference resource for mentors, especially where mentors are registered architects.
- Using the trainee guidance to provide a recommendation that they gain experience on UK-based projects.
- Consolidating similar sections on induction, objectives and progression to make the guidance clearer.
- Small wording changes like “employer” instead of “practice”, to better reflect that trainees may be working in different types of organisations.

2.34. We will also make sure both guidance documents align with changes we make in other areas, particularly to the coordinating role and Record, so that the guidance is clear and consistent to both trainees and employers.

### **Trainee Record of Experience**

2.35. We intend to proceed with the minimum requirements for the Record and have used the feedback through the consultation to make improvements to it:

- We will introduce additional minimum requirements for the Record to ensure it follows Government standards for accessibility and data collection, to ensure it can remain transferable and flexible to accommodate the variety of ways in which experience can be gained.
- We will introduce a further minimum requirement on keeping any Record costs, that are passed to users proportionate, consistent with our expectation that all eligible trainees on accredited programmes are able to use the Record.

2.36. We have considered what to say about who should corroborate the experience being recorded. Our view is that it should be a registered architect. This is to give the trainee and others supporting them more assurance about the experience they have gained. Our updates to the guidance for employers and trainees highlight this.

2.37. We are not proposing to assess the Record for registration. Learning providers may however choose to use the Record as part of their own assessment towards their own qualifications. As part of this, they might set additional requirements surrounding its use, such as who should corroborate the experience recorded.

2.38. Alongside the consultation, we have decided to not produce our own Record. The approach depends on the availability of at least one Record that meets ARB’s minimum

requirements. We expect RIBA's existing PEDR system to be capable of adaptation, but ARB will retain the ability to approve alternative Records if necessary. We will define an approval process covering mapping to the Practice Outcomes, transferability, accessibility, proportionality of cost, data protection and withdrawal of approval if requirements are no longer met.

- 2.39. We intend to proceed with the proposed advice topics to accompany the Record. We expect advice regarding completing the Record will be tailored to the format and provider of the Record. Hence, we will request Record providers develop this advice, with agreement from ARB. We will further request any Record provider signpost ARB's guidance to trainees and employers alongside their own advice.

### **Registration Rules**

- 2.40. We recognise the concern that removing a minimum period may be perceived as lowering standards. Our view is that a fixed period is an imperfect proxy for competence: two years of poor or narrow experience does not necessarily prepare someone to practise, while well-structured experience aligned to the Practice Outcomes will. Providing clarity about the achievement of practice outcomes will also mitigate the risk that trainees see the two years as the requirement, rather than acquisition of practical experience. The revised approach therefore strengthens the connection between experience and competence rather than relying on duration alone. This requirement is embedded in the Trainee Record of Experience which provides more visibility for trainees on their 'readiness' to take the practice qualification and register.
- 2.41. The proposed change does not remove the need for professional practical experience. It removes the separate time-based registration requirement. For new routes under the reformed framework, practical experience will instead be embedded within accredited qualifications where the Practice Outcomes must be demonstrated. ARB's assurance will operate through accreditation of qualifications, the Standards for Learning Providers, the Trainee Record of Experience and the Accreditation Handbook.
- 2.42. We knew before consultation that this is an area where we will need to be very clear about the changes. The responses have again illustrated the need to communicate this clearly, particularly to manage expectations of trainees and their need to reach the required Competency Outcomes.
- 2.43. We would like to:
- Proceed with removing the requirement that applicants for registration have at least two years of practical experience.

- Add to the trainee guidance and other published information that while there is no two year minimum, we expect most will still take at least this long to gain their qualification.
- How we communicate this will be very important and we will need to emphasise that:
  - The Outcomes will need to be met, regardless of time spent, and the change is not intended to lower the standard required to join the Register.
  - The package of changes, which are now stronger following consultation feedback, mean the experience trainees gain will be consistently higher quality.

### **Transition decisions**

2.44. We would like to proceed with our proposal that any changes will be phased in alongside new accredited qualifications as part of our transition, which will see all qualifications meet the Competency Outcomes (rather than the outgoing Criteria) by December 2028. This means that from December 2028:

- Qualifications will need to meet the new requirements.
- Trainees gaining these qualifications would not need a minimum of two years of practical experience to register.
- In doing so, the double counting rule would also no longer apply.

2.45. Some practice-level qualifications may be approved under the new outcomes-based framework before the wider transition date of December 2028. Where this happens, ARB will confirm as part of the approval process whether trainees completing that qualification will be subject to the existing practical experience requirements or the new outcomes-based approach. This will depend on whether the qualification has been approved as demonstrating the Practice Outcomes and includes sufficient assurance of the trainee's practical experience. ARB will publish transitional guidance so that providers and applicants understand which requirements apply during the transition period.

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## **3. Resource Implications**

3.1. We will need to publish and then incorporate the requirements into our transition to the new education framework. We will also need to undertake continued

engagement with Record providers to develop this further, as well as producing the content of the different advice topics.

- 3.2. We know from our experience and engagement with stakeholders, and learning providers in particular, that we need repeated engagement to avoid misinterpretation of what we are proposing. We do not anticipate significant additional resource requirements to do this.

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## 4. Risk Implications

- 4.1. As budgets within schools of architecture are particularly tight, we recognise that any additional regulatory costs could have an impact on the scope of provision or resources for delivery. While our proposals are relatively limited and should not in of themselves impact viability of qualifications, we continue to acknowledge this wider context.
- 4.2. We have developed these proposals in a considered way, involving learning providers and taking onboard their feedback. The consultation feedback has given us more information to assess this. We have also held further discussions with a small number of providers to test our changes since the consultation.
- 4.3. We do not believe that these proposals will affect our transition timeline, given the work we have done on engagement and the detailed analysis undertaken..
- 4.4. Stakeholders may argue that ARB has proceeded despite opposition to parts of the consultation, particularly removal of the two-year minimum. In mitigation of that risk, the Board paper and consultation report explain the concerns received, the amendments made in response, and the assurance model replacing the time-based requirement.

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## 5. Communication

- 5.1. We see this as a key moment in the implementation of the education reforms. Feedback from providers, practices and trainees has often been that they are waiting for various decisions from us. The decisions we hope the Board is able to make today will remove this uncertainty and allow us to give clarity. We plan to change our communication tone to match this, being much clearer that the transition is now set and everyone involved in education and training can now understand what will be expected of them.

5.2. If the Board approves the proposals, we will prepare a coordinated publication of:

- The updated Standards for Learning Providers. We will also publish an updated Accreditation Handbook that reflects the approved Standards and provides further information about how providers should meet our requirements.
- Finalised guidance for trainees and for employers. We will publish these in 2026 with a note that although it is before the transition in 2028, we are publishing them now so that trainees and others can benefit from the information within them.
- The minimum requirements for the Trainee Record of Experience and our decision on the format.
- Updated Registration Rules.
- Our transition timeline to the new requirements.
- Renewed website pages that are more final in tone and clearer in formatting and content, helping everyone understand what changes are coming and when.

5.3. We have been in regular contact with the RIBA in respect of the development of the PEDR to meet the requirement of the Trainee Record of Experience, and will continue to do so. Assurances have been provided by the RIBA that they are ready and willing to make the necessary amendments to their portal.

5.4. We will also directly email stakeholders and the architecture media and hold a webinar for anyone to hear about the changes.

## 6. Equality and Diversity implications

6.1. Throughout our engagement and research for the education reforms, we have consistently heard that the PPE requirements, whilst an essential aspect of an architects' training, can act as a barrier that limits access to the profession. The Commission's recommendations improve fair and consistent access to quality practical experience. These proposals, following on from those recommendations, advance those same aims and are now stronger in doing so than before the consultation.

6.2. The consultation asked about implications for equality, diversity and inclusion. We have been able to consider the feedback from respondents on this and do not have concerns.

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## 7. Recommendations

It is recommended that the Board approves:

- i. Updates to the Standards for Learning Providers
- ii. New guidance for employers and for trainees
- iii. Minimum requirements for a Trainee Record of Experience and accompanying advice topics
- iv. Updated Registration Rules

The Board is asked to approve the policy position and final proposed wording in the annexes, noting that the Accreditation Handbook will be updated consistently with these decisions.



# Improvements to professional practical experience

Consultation analysis report

January – April 2026

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# Summary

In April 2025, the independent Professional Practical Experience (PPE) Commission published its recommendations to transform how future architects gain quality professional practical experience. ARB welcomed the report and in response published a comprehensive plan outlining the steps we intend to take to realise the Commission's vision.

In this consultation, we set out proposals for revised PPE requirements as a package of changes. **The package of proposals included:**

1. **Changes to ARB's Standards for learning providers** and Accreditation Handbook, to introduce a coordinating role for learning providers and the use of an ARB-approved Trainee Record of Experience
2. **New guidance** for employers and trainees
3. Minimum requirements for a new **Trainee Record of Experience** and topics for supplementary advice
4. Changes to **ARB's Registration Rules** to update our practical experience requirements

Combined, these changes aimed to improve fair and consistent access to quality practical experience. They centred on improving trainees' experience so that it would be of consistently higher quality and more effective, encouraging support towards them and helping them to navigate their way through to registration.

The consultation asked for views on these proposals. It asked respondents to what extent they agreed with the proposals, areas that were missing from our proposals, and whether there were parts of the proposals that would be difficult to implement.

## Insights

The consultation was open between 15 January and 15 April 2026. During that time, we received 87 responses. We read and analysed each response against the recurring themes we observed (see Annex C) and tracked the number of respondents raising each of these unprompted. The consultation told us about specific concerns or areas for further development on each proposal. We also noted any specific suggestions for improvements that respondents made.

### Updated Standards for Learning Providers

We asked respondents whether they agreed with the proposed changes to the Standards that would implement a new coordinating role for providers. The most common response was neither agree nor disagree (22, 25%) but more respondents disagreed (35, 40%) than agreed (30, 34%).

Respondents had concerns with specific parts of the proposals rather than the overall principle that providers should undertake the role. There were similar occurring themes:

- Concern about being asked to maintain a list of employers and how they should determine whether those employers are suitable. This included worries about they would do this when experience can vary between trainees and over time.

- Concerns about the resource requirements on providers and how these requirements might affect future provision of accredited qualifications.
- Concerns about the role of providers, such as potential liability from decisions they make and whether the requirements were asking them to go beyond their remit. This included misunderstandings that they would have to offer specialist employment advice.

### Guidance for employers and trainees

We published proposed guidance to both employers and trainees and asked respondents whether they agreed with the content of both. Respondents primarily agreed (50, 57% for the employer guidance and 54, 62% for the trainee guidance), although similar themes recurred in their responses:

- Concern that the guidance might limit access to professional practice, such as through employers being unable to offer training that met the guidance.
- Requests for clarification where at least one part of the guidance was unclear.
- Suggestions for us to consider, including specific wording and additions.

### Trainee Record of Experience

We proposed learning providers use an approved Trainee Record of Experience (a Record). We proposed minimum requirements for the Record, alongside advice topics, and asked respondents whether they agreed with both.

Responses were positive toward the minimum requirements, with 42 respondents (48%) agreeing. The three advice topics received higher agreement, with between 54% and 66% of respondents finding these very helpful. Similar themes emerged across the responses, which were:

- The respondent saying at least one part of the proposals was unclear, including how it differed to existing systems of recording progress.
- Concerns that the provision and expectation of a Record was not within ARB's remit.
- Suggestions for the Record, including advice topics to support it.

### Registration Rules

We proposed changes to the Registration Rules, which set out ARB policies relating to registration matters, with the main proposed change being the removal of the requirement that applicants for registration have at least two years of practical experience.

The most common response was neither agree nor disagree (24, 28%) but more respondents disagreed (39, 45%) than agreed (24, 28%). Common themes respondents shared were:

- Concern that the change would lower standards of the profession.
- Concern about the perception it would give trainees of the time required and therefore their expectations of how long their training would take.
- That the minimum time helps employers to structure experience and manages their own expectations of trainees.

## Other questions

We explained that the proposals were intended to work together to provide additional support for trainees, and asked respondents whether they agreed. The most common response was neither agree nor disagree (32, 37%) but more respondents agreed (30, 34%) than disagreed (25, 29%).

We asked respondents if they had any feedback about a positive or negative impact of equality, diversity and inclusion within any of our proposals. There were no significant concerns.

The consultation proposed that any changes would be phased in alongside new accredited qualifications as part of our transition, which will see all qualifications meet the Competency Outcomes (rather than the outgoing Criteria) by December 2028. We asked respondents if they had any feedback on these plans. We will use their feedback to decide on a transition timeline to the new requirements. This will be published alongside the new and finalised changes.

## Next steps

We have used the feedback we received across the consultation to examine the effectiveness of our proposals and make updates to them to better suit their objective of supporting trainees. As a result, we are proposing the following amendments and approach to each area of the proposals:

1. **We will retain the principle of a key role for learning providers but will update the proposals using respondents' feedback.** In the responses, there were some areas of significant concern about the details of the role that we proposed, and feedback will help us refine the proposal to reflect these concerns. As we retain the coordinating role, we will focus on making the requirements less prescriptive while still achieving the aims of providing more support to trainees across their experience.
2. **We will proceed with the guidance but use the feedback to make improvements to it.** We will also make sure it aligns with changes we make in other areas, particularly to the coordinating role and Record, so that the guidance is clear and consistent to both trainees and employers.
3. **We will proceed with the minimum requirements for the Record and the advice topics we proposed and add specific additional minimum requirements.** We will also decide the format of the Record (which was outside the scope of this consultation) and ensure the final requirements align with that decision, making further changes as needed before the requirements are published.
4. **We will consider the feedback received on our Registration Rules carefully alongside our intent to remove the minimum requirements and the original rationale for an outcomes-based approach to competence.** We will explain that the change removes a time-based proxy, not the need for practical experience, and that assurance will instead sit within accredited qualifications and the Practice Outcomes.

# Engagement

- 1.1 To ensure the proposals we consulted on would reflect the realities of education and practice, we undertook extensive engagement to speak to learning providers, professional organisations, and employers. This engagement included:
  - Three detailed focus groups with a total of 18 learning providers, to refine and test the proposals on the Standards for Learning Providers.
  - A Reference Group established to support development of the Trainee Record of Experience.
  - A survey asking for initial views on the coordinating role for learning providers, which had 65 responses (of which 28 were official organisation responses).
  - Our Board hosted a workshop in Glasgow with practices and learning providers.
  - Further separate meetings with professional bodies.
- 1.2 During the consultation period, we undertook visits to learning providers and their trainees, employers, and online webinars as part of our normal work. During these we shared the proposals and gained further anecdotal feedback.
- 1.3 We undertook trainee talks (online and in-person) at seven learning providers, where we shared information about the proposals and encouraged attendees to respond to the consultation. Through these trainee talks we spoke to **over 350 trainees and apprentices**.
- 1.4 While these trainee talks were not focused discussions on the proposals, we anecdotally received positive feedback. While there was not a specific proposal that they disproportionately agreed or disagreed with, we heard feedback from them on how the new qualification framework and PPE proposals might affect them and the support they could expect to receive in practice, or where they might be able to seek professional experience. They thought the guidance we proposed for them and for employers would be helpful; they also requested more signposting and clearer communication about the range of routes that would emerge from the new framework and PPE requirements.
- 1.5 Colleagues across ARB undertook visits to practices, where we were able to provide an update on the proposals. We additionally spoke to professionals working in HR roles in architecture practices, where we described in detail the specific proposals that affected employers, answered clarificatory questions and directed them to the consultation. Through these events we spoke to **over 100 professionals**.
- 1.6 We were able to speak to more individuals at learning providers through their professional networks in APSA and AAE (Association of Architectural Educators). Through the AAE, we spoke to **20 individuals**.
- 1.7 APSA organised two webinars on ARB's behalf, reaching **80 individuals**. Attendees might have attended multiple sessions, but in each session, we were able to describe the proposals in detail, answer questions attendees had, and clarify the intention of the proposals.

# Updated Standards for Learning Providers

**2.1** The first set of proposals were updates to the Standards for Learning Providers to include that learning providers undertake a coordinating role in facilitating trainees' acquisition of the competency outcomes. We specified that the coordinating role would apply when trainees are enrolled on an accredited qualification where the Practice Outcomes are a requirement of that qualification. This would be:

- either an accredited Practice Outcomes qualification.
- or an accredited master's-level qualification that includes a practical element (e.g. delivers some Practice Outcomes and/or includes a work placement).

**2.2** The proposed change to the Standards was an update to 'Standard 6 – Student Support' and states that learning providers will meet this requirement by "6.2: Taking a coordinating role in facilitating trainees' acquisition of the Practice Outcomes, where it is a requirement of the qualification." We also said:

"Coordination will include using an ARB approved Trainee Record of Experience to support trainees in understanding their progression towards achieving the Practice Outcomes, maintaining a list of suitable employers, and offering advice where trainees have concerns about their employment."

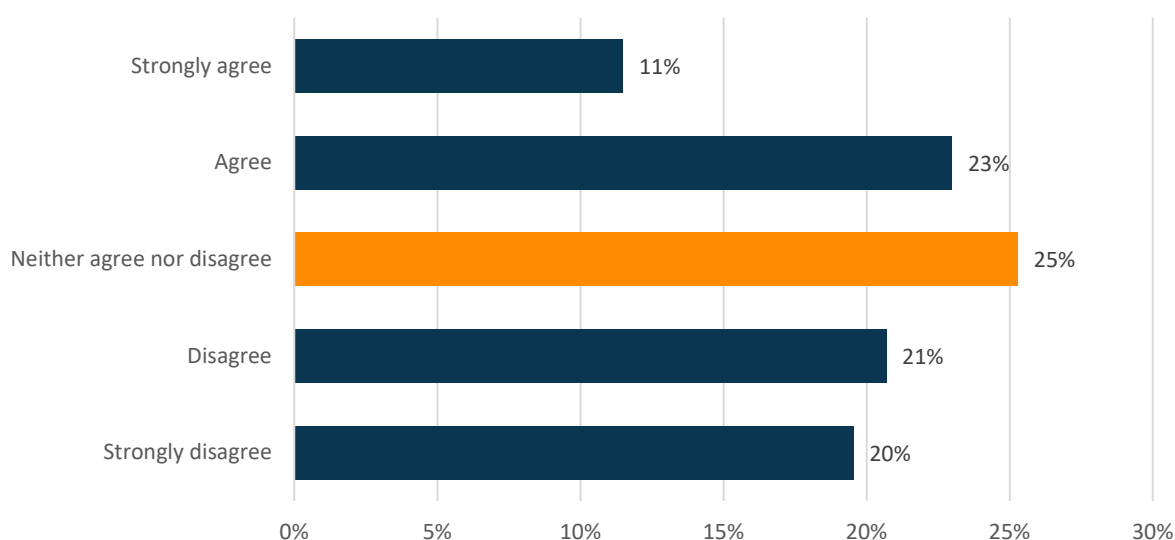
**2.3** We published proposed updates to the Accreditation Handbook to provide more information to respondents about how providers would need to meet the new Standard. These included that the coordination role would include:

- An appointed individual/s provided with sufficient resource to coordinate the provider's relationship with employers.
- Offering support to trainees to help them find available work placements, including maintaining a list of potential employers to aid them.
- Reasonable assurance that those on the list of available employers are, and remain, suitable practices at which trainees can acquire relevant experience to meet the Practice Outcomes. While the employer does not need to be geographically close to the provider, the provider should be able to maintain contact with the employer for this assurance. It is also recommended that trainees gain experience within the UK as this will help them meet the Outcomes covering regulations, standards, codes of practice and policies related to the development of the built environment.
- Making trainees and employers aware of the ARB guidance on Professional Practical Experience.
- Providing advice to trainees where they have shared concerns about workplace behaviour or employment conditions, referring them to specialist organisations where appropriate.
- Providing trainees with an ARB approved Trainee Record of Experience, in which they will record their progress towards meeting the Practice Outcomes.

- Using the ARB approved Trainee Record of Experience to individually advise trainees about what practical experience they require to meet the Practice Outcomes, how they can acquire it and reflecting with them on their progress.

**2.4** We asked respondents whether they agreed with the proposed changes to the Standards. The most common response was neither agree nor disagree (22, 25%) but more respondents disagreed (35, 40%) than agreed (30, 34%):

**Figure 2.1: To what extent do you agree with the proposed changes to the Standards for learning providers? (% of responses)**

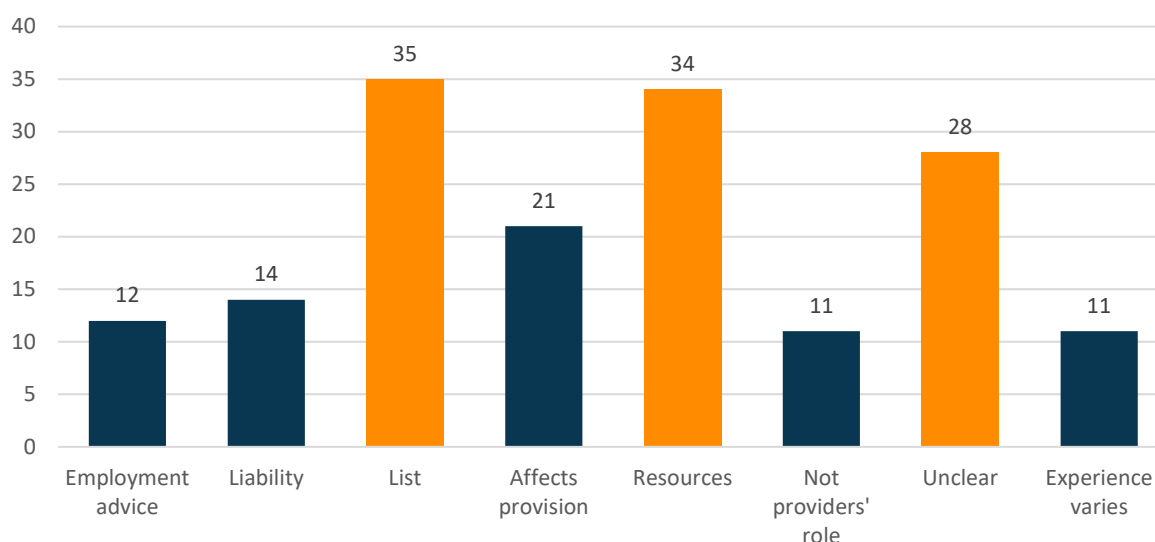


**2.5** Both academic and registrant respondents had mixed views, although both also disagreed overall. All trainees except one were either neutral or positive towards the Standards. The one who disagreed said the proposals do not do enough to protect employees.

**2.6** The qualitative responses suggest that disagreement was driven mainly by concerns about specific implementation requirements, particularly the proposed employer list, provider liability and resource burden, rather than opposition to the overall aim of improving support for trainees. When we read respondents' comments in detail, the most common themes raised were:

- Concern about maintaining a list of employers (35, 40%).
- Concerns about resources (34, 39%).
- The respondent saying at least one part of the proposals was unclear (28, 32%).

**Figure 2.2: Common themes about the coordinating role  
(numbers of responses)**



**2.7** As part of our analysis, we read the different specific suggestions from the 30 respondents (34%) who used their free text response to give us suggestions for ways we could improve the changes.

**2.8** We also tracked how many respondents used their free text response to indicate unprompted support for the *intent* of the changes. This helped us assess support for our aims when respondents disagreed with the Standards proposals but may have done so because of concern about a particular part. We found that among the 35 respondents who disagreed with the proposals, 5 still indicated some level of agreement with the intent of them. Among the 22 who were neutral, 9 did so.<sup>1</sup>

““The coordinating role will give learning providers a clear responsibility to maintain a list of suitable employers and to advise trainees on employment concerns. This is especially valuable for international students who may lack local networks and need support in identifying practices that are open to sponsoring visas or offering part-time roles that align with Student Visa restrictions.”

*Architecture Student – graduate (studying Part 2), South West*

<sup>1</sup> This does not mean the remainder necessarily disagreed with the intent. This is just how many indicated support unprompted.



## The role of providers

- 2.9** Only 11 respondents (13%) expressed an in-principle opposition to the overall coordinating role or any of the requirements within it being placed on learning providers.

“The idea that Universities can be held responsible for providing the learning requirements needed at Part 3 is crazy. [...] The entire notion that providers can take a coordinating role in facilitating trainees’ acquisition of the Practice Outcomes is impractical.”

*Registered architect, Yorkshire & Humber*

## Conclusions

It is still our view that learning providers are best placed to undertake the role because of their oversight of the educational process, their relationship with trainees, their ability to address specific gaps in learning as part of the qualifications they provide, and the potential for them to develop links with architectural practices. The small numbers raising a principled opposition to this also gives us confidence in this view. However, it is also clear that there are some areas of significant concern about the details of the role that we proposed. While continuing to implement the overall role and continuing with the intent of the proposals, we must adapt the details of what we ask providers to do.

## Maintaining a list of suitable providers

- 2.10** The proposed new Standard included “maintaining a list of suitable employers” and the proposed Handbook changes included:

*“Offering support to trainees to help them find available work placements, including maintaining a list of potential employers to aid them.”*

*“Reasonable assurance that those on the list of available employers are, and remain, suitable practices at which trainees can acquire relevant experience to meet the Practice Outcomes.”*

- 2.11** A large number of respondents used their responses to raise concern about creating and maintain this list, with it being the most common theme (35 respondents, 40%) they raised.
- 2.12** Asking providers to assess the suitability of an employer was a recurring concern. This was also a common area where respondents said our proposals were unclear. Respondents asked for more information on what they should consider to be suitable. They questioned how they would continue to monitor that in order to maintain a list that was reliably up to date, when this would require up to date knowledge of how the employer was functioning. Eleven respondents (13%) had concerns about how providers can be assured about the quality of experience when it can vary, even at the same employer between different trainees or over time across different cohorts.
- 2.13** Examples of other concerns we received about the list proposal included:
- The small number of employers that they would be able to assess and maintain assurance about, and therefore the small number of employers that would be available to their trainees.

- Difficulties for those without strong local practices nearby.
- The practical consequences if they stopped considering that an employer was suitable.
- The burden on providers with very large cohort sizes.
- Uncertainty about what they would be expected to demonstrate as part of having their qualification accredited by ARB.

## Conclusions

Consultation responses suggest that expectations around learning providers maintaining lists of suitable employers may be interpreted as transferring elements of assurance responsibility from the regulator to providers. This could create uncertainty about the intended scope of the coordinating role and may require refinement to ensure expectations remain proportionate and clearly aligned with education provision rather than employment oversight.

For the list to achieve its aim of acting as a resource to help trainees to find employment, it must be achievable to create, reliable to maintain and workable in practice.

It was clear that learning providers who responded had significant concerns about their ability to do this. This included substantial worries about challenging situations where doing so would not be possible.

We will amend this part of the proposals. Learning providers will not be required to maintain a list of potential employers.

## Liability

**2.14** Within their open text responses, 14 respondents (16%) had concerns about legal implications on providers arising from the coordinating role. Situations they were worried about included:

- If an employer they coordinate with does not provide a good experience for the trainee.
- The data protection implications of maintaining a list.

“Whether a practice is ‘suitable’ might devolve back to students passing the practice qualification. Who has the responsibility if a student fails? The practice / the student / the provider? There would be legal implications for maintaining a ‘suitable’ list that could be challenging for learning providers. For example, a practice might sue for reputational damage if they are not included or are removed from a list; or a student/trainee might sue a provider for negligence if an employer is deemed to be suitable by the provider but is unable to provide appropriate or timely experience.”

*Learning Provider, Wales*

## Conclusions

We expect these concerns will be partly addressed by changes to the list proposals. We understand providers may have uncertainty if the remaining parts of the coordinating role are new to them, and that this may include some questions about their legal position when carrying out the role.

Our view is that the coordinating role is not a fundamental change in the relationship between a provider and their trainees. We have also considered how many providers are already undertaking the activities that other providers were concerned about. We therefore do not see this area of concern as a reason to amend the proposals.

## Advice to trainees on their employment

**2.15** The proposals included that providers should give advice to trainees if they have concerns about workplace behaviour or employment conditions. Twelve respondents (14%) expressed some kind of concern about this. Points they raised included:

- This could be interpreted as a requirement to give detailed legal advice on employment issues, which would extend beyond learning providers' role.
- The capacity and expertise within providers to offer specialist advice.
- Clarity on expectations trainees would have of providers to support them.
- That we should be clearer that providers aren't expected to give substantial employment advice.

"Providers don't have in-house expertise on HR/employment rights/contract law etc...so providing robust and consistent advice on employment issues would be challenging."

*Registered architect, East Midlands*

"The requirement to provide advice where trainees have "concerns about workplace behaviour or employment conditions" is similarly undefined in ways that potentially create risk. Providers are not employment law specialists. When a trainee raises a concern about, for example, unpaid overtime, bullying by a senior colleague, or a dispute about the scope of their role, the appropriate response depends on the facts of the situation and the applicable law — neither of which a provider's academic staff are equipped to assess."

*Academic (registered architect), London & South East*

## Conclusions

This was a common area during our discussions with providers when we were developing our proposals before consulting. The proposals we published aimed to be clear that we recognise there is a limit to a provider's role and that there may be circumstances where they instead need to refer a trainee to advice offered by others.

Our view on this part of the coordinating role has not changed: we believe providers should be able to either help on employment issues or signpost to others. As we update the proposals, we will see where we can make our expectations clearer and wording changes that would help to address concerns. We will also review the material we publish to see where we could make it as clear as possible that redirecting trainees to others is acceptable.

## Resources and implications for provision

**2.16** Thirty-four respondents (39%) used their comments to raise general concerns about learning providers resourcing the coordinating role and 21 respondents (24%) thought the proposals might reduce provision by either:

- Reducing how many learning providers can offer qualification.
- Affecting how many qualifications of a certain type might exist (e.g. if practice level requirements caused providers to change to offering more academic only qualifications).
- Limiting trainee choice and movement.

“Requiring a learning provider to take on a ‘coordinating role’ in relation qualifications that address the ARB practice outcomes and PPE is likely to have resource implications, which cannot be readily ascertained without much more clearly defined expectations. Architecture schools/departments will come under pressure from institutions to minimise the financial risks, which might put in jeopardy the provision of qualifications.”

*Learning provider, Wales*

“The resourcing implications are substantial. The co-ordinating role described [...] represents a significant commitment to staffing that goes significantly beyond what most providers currently have in place. For smaller providers in particular, this may be very difficult to absorb. The standard does not differentiate between providers of different sizes or with different qualification structures. A large provider with several hundred trainees undertaking Practice Outcomes has a fundamentally different coordinating challenge from a small provider with a cohort of say twenty.”

*Academic (registered architect), London & South East*

“Some learning providers might feel the requirement for a coordinating role during Part 3 is too onerous and costly. Some may choose to restrict student numbers, to close their current Part 3 provision or to forgo the pursuit of a new ARB accredited award. The outcome here might be less choice for graduates and accessing the register could become more difficult.”

*APSA*

## Conclusions

The concerns within the responses are similar to those we heard while developing the proposals. The responses have not changed our assessment of this risk.

Although the changes reflect much of what many schools are already doing, we had heard concerns from learning providers about potential additional burdens on them. As budgets within schools of architecture are particularly tight, we recognise that any additional regulatory costs could have an impact on the scope of provision or resources for delivery. While our proposals are relatively limited and should not in of themselves impact viability of qualifications, it is important to acknowledge this wider context.

## When the coordinating role should be required

**2.17** We proposed that the coordinating role would only apply when trainees are enrolled on an accredited qualification and where the Practice Outcomes are a requirement of that qualification. We expected this would be:

- either an accredited Practice Outcomes qualification, or
- an accredited master's-level qualification that includes a practical element (e.g. delivers some Practice Outcomes and/or includes a work placement).

**2.18** Some of the suggestions respondents gave us included that we should expand where the role is required.

"The proposals seem to be a serious missed opportunity. It isn't clear that these changes will address the PPE commissions concern that too much of the 'burden' for navigating professional practice experience is on the shoulders of the trainee, because the coordinating role will only apply once a trainee is enrolled on a 'practice outcomes' qualification."

*Learning Provider, Wales*

"ARB have proposed that the learning co-ordination role would only apply when trainees are enrolled on an accredited qualification where the Practice Outcomes are a requirement of that qualification. However, students may be employed by practices when they are not undertaking a qualification, i.e. commonly in a period between undergraduate and postgraduate studies ('year out'); or following completion of postgraduate studies but prior to commencing a Practice Outcomes qualification; or indeed while they are engaged with a full-time course as a means to pay their tuition fees or other costs."

*RIBA*

“The proposals indicate that the coordinating role would be required only where a Practice Outcomes award exists and once ‘trainees’ are enrolled on that award. There are several risks with this proposal. Gaining experience will not be limited to the period when a student is enrolled on a Practice Outcomes award. If there is no requirement by ARB to provide such a service outside of that award, then learning providers might feel there is no longer a need for Professional Studies Advisors to support graduates in employment. This means that graduates may not record their experience in the TRE nor will they be able to access the support that they get currently, e.g. at post-Parts 1 and 2.”

APSA

“As many students already work in practice while studying and this may well increase with the sensible removal of the "double counting rule", it would be very sensible for qualifications that require a demonstration of the Academic Outcomes to be expected to undertake some level of coordinating role too. If there no requirement for this, it may well be that cash-strapped universities loose staff with experience of UK practice and knowledge of the current Part 3 Criteria / incoming Practice Outcomes, simply because they are not required.”

*Academic (registered architect), Scotland*

## Conclusions

We think it is still important to distinguish between expectations during a practice qualification and one that is only academic. However, we agree there is an important role for providers in having a holistic view of a trainee’s progress towards registration and preparing them for future progress, and that this should happen to some extent across all qualification types.

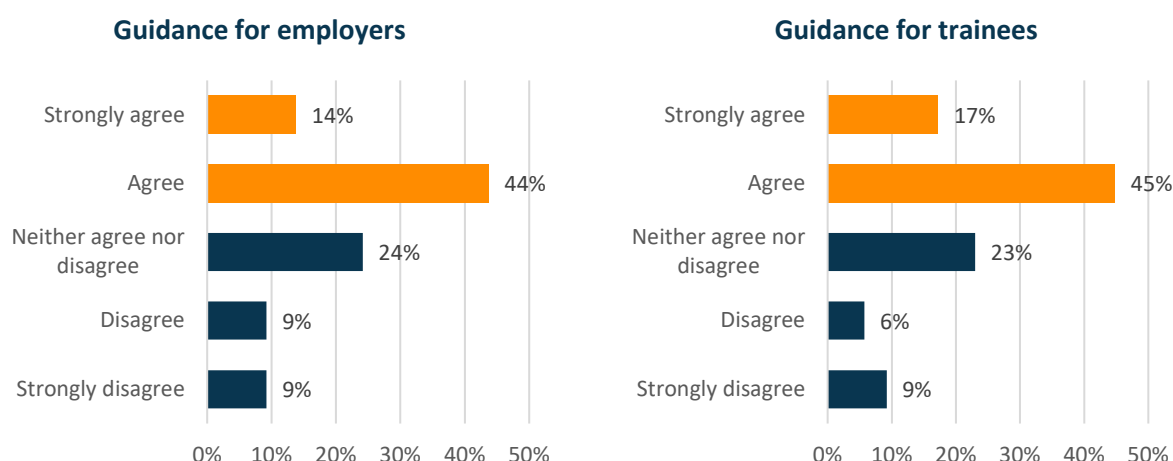
The Standards and handbook already include expectations of support across these and, as part of finalising the proposals, we will consider how we can emphasise this.

We do not think it is proportionate to require providers to offer support to trainees when they are not enrolled on any qualification at all. Some may choose to do this as part of the terms of their qualification and their offer to potential trainees, and we expect many would benefit from doing so, but we do not plan to require it.

# Guidance for employers and trainees

- 3.1** We published proposed guidance to both employers and trainees. The guidance would advise on the expectations of both groups during periods of employment. It would also provide clarity about who is responsible for supervision. As part of their coordinating role, learning providers would need to make trainees and employers aware of this guidance, and as such this material could be used by them to support their trainees. We also wanted to use it to reduce the burden placed on providers, as the guidance would be produced by ARB, whilst also helping to standardise the information trainees and employers receive.
- 3.2** We asked respondents whether they agreed with the content of both areas of our draft. Respondents agreed with the proposals for both, with little disagreement:

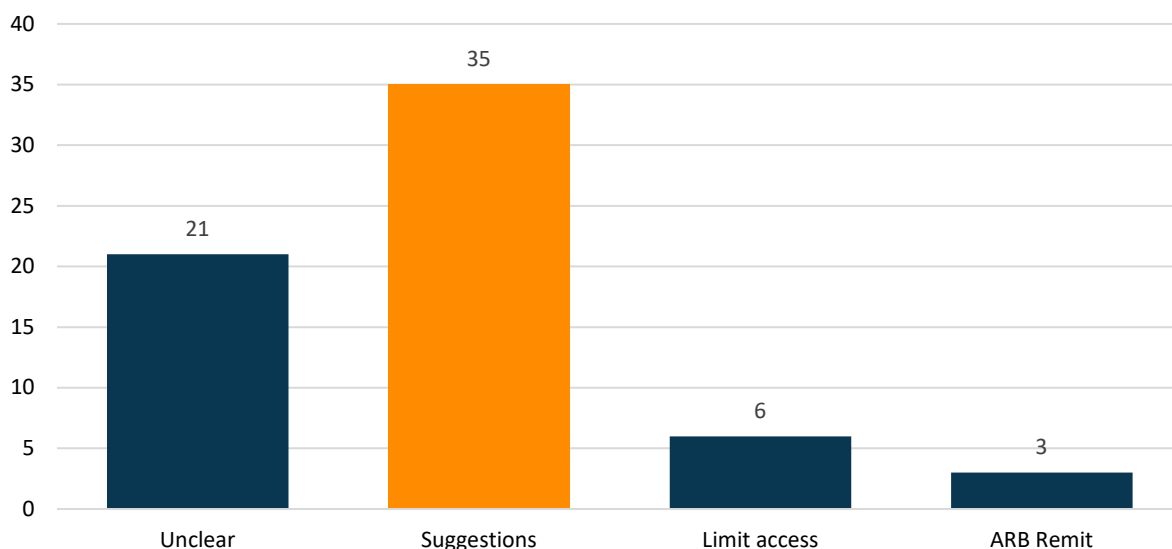
**Figure 3.1: To what extent do you agree with the content of the guidance? (% of responses)**



- 3.3** More than half of respondents agreed with the guidance document for employers, with 50 of 87 respondents (57%) either agreeing (38, 44%) or strongly agreeing (12, 14%) with the draft guidance document. Twenty-one respondents (24%) neither agreed nor disagreed with the guidance for employers while 16 respondents (18%) either disagreed (8, 9%) or strongly disagreed (8, 9%).
- 3.4** We received similar levels of agreement from respondents on the guidance document for trainees. Fifty-four respondents (62%) either agreed (39, 45%) or strongly agreed (15, 17%) with draft guidance for trainees. While 20 respondents (23%) neither agreed nor disagreed with the guidance and 13 respondents (15%) either disagreed (5, 6%) or strongly disagreed (8, 9%) with the guidance for trainees.
- 3.5** Respondents could further explain their answer, and from these views, we were able to identify four key themes respondents raised. These were:
- Requests for clarification where at least one part of the guidance was unclear (21 responses, 24%).
  - Suggestions for us to consider, including specific wording and additions (35 responses, 40%).

- Concern that the guidance would limit access to professional practice, such as through employers being unable to offer training that met the guidance (6 responses, 7%).
- Disagreement with ARB providing this guidance and it being outside our regulatory remit (3 responses, 3%).

**Figure 3.2: Common themes raised by respondents (number of responses)**



## Unclear

**3.6** Twenty-one respondents (24%) expressed views that areas within the two guidance documents were unclear and requested clarity on certain areas within the documents. These areas included:

- How international trainees and their specific training circumstances would be addressed.
- How trainees could raise concerns during their practical training, whether to their learning provider or their employer, or externally to ARB.
- Whether a third person would be available and required to help mediate records and advocate for trainees if needed.
- Enforcement mechanisms for employers who did not follow the guidance.
- Clarity on whether the mentor/ employer needed to be a registered architect.
- How self-employed trainees would get work experience.
- Requesting clarification on the Practice Outcomes and examples that would help trainees understand how to gain them.



“The enforcement position is unclear and places disproportionate burden on learning providers. The guidance describes itself as advisory, yet states that learning providers “will monitor the suitability of placement environments and may withdraw approval if standards are not met.” If the guidance is advisory for employers, it cannot simultaneously function as an enforceable standard that learning providers are expected to police.”

*Academic (Registered Architect), London & South East*

## Limit access

- 3.7** Six respondents (7%) mentioned that the guidance documents could limit trainees’ opportunities in finding suitable employers for practical experience. This was because they thought the new guidance would limit the number of employers willing to take on trainees, and therefore reduce the number of training opportunities available.

“[...] the guidance places a notable amount of responsibility on the trainee to be proactive, raise concerns early, and self-advocate, while the escalation routes available to them remain limited and indirect. A trainee who raises concerns with their mentor, their supervising architect, and their learning provider, and gets no resolution, is then pointed towards ARB guidance on whistleblowing. That is a significant ask of someone in a junior and economically precarious position. The guidance should be more explicit about what ARB itself will do if concerns are raised with it directly, and whether any confidential reporting route exists.”

*Registered Architect, London & South East*

“The guidance risks dis-incentivising practices from taking on students. All the points in the guidance are fair and valid (and morally correct) but some of them are already enshrined in law and some are impossible to guarantee. [...] the requirement for academia to police these standards places a significant burden on both academia and practice which will be very hard to deliver. Practices are businesses and are subject to the work they have secured at any given time. They cannot guarantee that the range of experience the trainee needs will be available within a reasonable timeframe.

*Registered Architect, London & South East*

## Remit

- 3.8** We received feedback from three respondents (3%) who believed that ARB providing these guidance documents was outside our remit or that it was not appropriate for us to instruct employers of trainees on what they need to do.

## Suggestions

- 3.9** There were 35 respondents (40%) who provided suggestions for ways to improve the guidance documents. This included suggestions about specific wording and drafting changes, and suggestions for additional areas for us to cover.
- 3.10** Respondents made a range of suggested changes including:
- Specific wording changes.
  - Understand expectations of the role of learning providers and employers have together.
  - Having regular tripartite reviews between trainees, employers, and learning providers.
  - Providing further details about trainee payment, including the living wage, working hours, and reducing exploitation of trainees through unpaid work.
  - Ensuring employers give a variety of work and responsibilities for trainees.
  - Acknowledging the limitations employers have in terms of budget, work variety, and ability.
  - Having clear guidelines on how to train and maintain competent mentors.
  - Trainees should have clear contracts and examples of contracts and templates that should be completed.
  - Including helpful resources and organisations for trainees, for further clarity in areas such as employment advice.

“Work is often allocated to suit the needs of the business rather than the individual's development and is often unstructured, as experienced in a couple of practices. So a balance is important. There could be more emphasis on how employers should deal with concerns raised by employees about colleagues inappropriate behaviour or other workplace issues, ensuring employees concerns are taken seriously and kept confidential.”

*Architectural assistant, designer or consultant (not Part 3 qualified), London & South East*

- 3.11** Within the suggestions we received, 32 responses had suggestions relating to trainees and safeguarding their welfare (91%). These included suggestions that employers ensure trainees receive time off to study for their qualifications, or that trainees should ensure balance between their responsibilities to their employer and their learning provider.
- 3.12** Signposting to short courses, CPD, or external events was raised as a suggestion to inculcate supportive behaviour during practical experience, both by employers and trainees. Respondents suggested ARB signpost or raise awareness on CPD that could be completed by employment mentors.
- 3.13** Eighteen respondents mentioned suggestions around operational aspects for employers (51%). These included considerations such as hybrid working, flexible working, and how variation in employment types and project types might lead to irregularity in the consistency of practical experience for trainees.

- 3.14** Respondents further suggestions on how employers could support trainees with older, or pre-existing Records (Trainee Record of Employment). They requested clarity on corroborating trainee experience through the Record, and how trainees could expect corroboration where employers might fall short of their responsibilities towards the trainee and their progress.
- 3.15** Seven respondents had suggestions regarding the Practice Outcomes (20%). Respondents suggested the guidance be written with specific examples to support the acquisition of the Outcomes, how practical experience aligned to the ways in which trainees could gain relevant experience toward the Outcomes. We received further suggestions on clarifying the Practice Outcomes for employers, which would help them tailor the experience they offered to trainees.

“I believe this is useful guidance- particularly for trainees who may not have been in a workplace before. However, as previous comments, it will have more strength if communicated to students at the point they are seeking employment (i.e. before they graduate) and if subsequently provided as part of an employment contract and associated induction by the employer. A template induction programme would also be useful.”

*Registered Architect, London & South East*

- 3.16** We received suggestions on strengthening the usage, definition and application of the term ‘mentor’ and ‘mentorship’ with respect to how mentors could support trainees. Respondents requested more guidance on how to identify appropriate mentors, and that mentors should be expected to undertake specific training to be able to support trainees appropriately. Another suggestion was caution on using the term ‘placement,’ as this can have a specific meaning within academia.

## Conclusions

Strong levels of agreement with our proposals give us confidence that the proposed guidance documents will be helpful to employers and trainees. Respondents suggested that the guidance be better highlighted and that we ensure trainees and employers are aware of this guidance at early stages of the trainee’s qualification. We also received detailed suggestions to improve the wording of the guidance, and we will consider these as we finalise the two guidance documents.

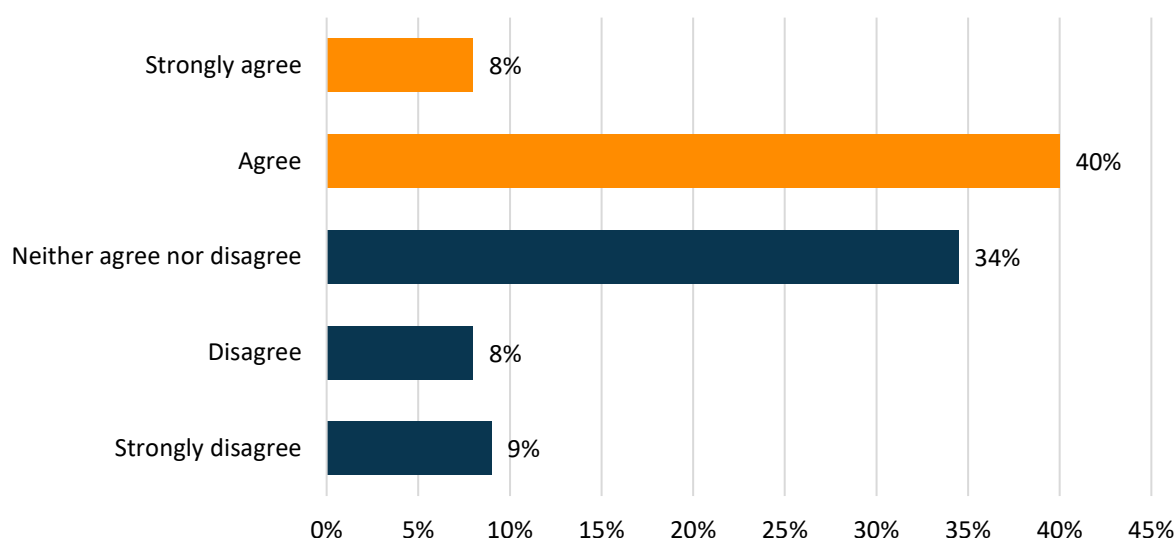
We will also amend our proposals for the coordinating role for learning providers to include that learning providers make trainees aware of the guidance, regardless of which type of accredited qualification the trainee is pursuing, which would further help increase awareness of it.

We will also ensure the guidance is clearly and readily available on our website.

# Trainee Record of Experience

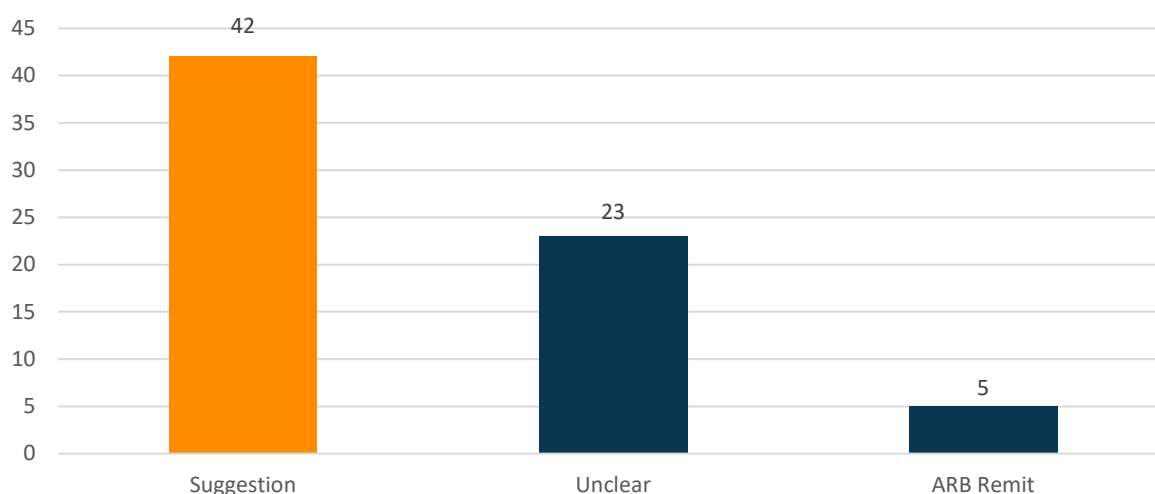
- 4.1** The proposed changes to the Standards and Handbook included that learning providers should use an ARB approved Trainee Record of Experience (a Record) to individually advise trainees on their progress. The Record is intended to provide a consistent mechanism for logging practical experience against the Practice Outcomes across different qualification routes and to provide more clarity to trainees about where they are on the journey to registration.
- 4.2** As part of the consultation, we also proposed to set minimum requirements for the Record. These are the requirements that a Record would need to meet for ARB to approve its use by learning providers. We also asked for respondent views on areas of advice we proposed to provide alongside it. We clarified that we have not yet made a decision on the format the Record should take.
- 4.3** We asked whether respondents agreed with the minimum requirements we proposed. Responses were more positive than negative, with 42 respondents (48%) agreeing and only 15 (17%) disagreeing:

**Figure 4.1: To what extent do you agree with the minimum requirements? (% of responses)**



- 4.4** We looked at the common themes being raised by respondents in the open text sections. The most common themes raised were:
- The respondent saying at least one part of the proposals was unclear (23, 26%)
  - Concerns that the provision and expectation of a Record was not within ARB's remit (5, 6%).
  - 42 respondents (48%) gave us suggestions for the Record.

**Figure 4.2: Recurring response themes (number of responses)**



## Unclear

- 4.5** Our engagement during the period of consultation had suggested that respondents might have confusion about how the Record would compare to the RIBA PEDR (Professional Experience Development Record). Alongside analysing whether respondents agreed with the minimum requirements, we also specifically tracked responses that conflated or confused the RIBA PEDR to the Record. Twenty-five responses (29%) mentioned the PEDR. These responses also requested clarification on whether the Record would be additional to the PEDR, and comments on how the PEDR could adapt to align with the Record.
- 4.6** Another area where respondents were unclear about the proposal was the format of the Record. Considerations and confusion regarding the format were raised in seven responses (30%), and questions included whether there would be multiple versions of the Record across different trainees and different learning providers. Respondents also said the Record needed to accommodate the logging of different forms of practical experience (such as through self-employed routes or working at non-architectural employers).
- 4.7** The minimum requirements for the Record proposed that the Record “will be flexible in its format to accommodate the variety of qualification routes and different formats in which experience can be gained.” We have not yet made a decision on the format the Record should take. Under this minimum requirement, we would ensure that different formats in which practical experience could be gained would be covered by the Record.
- 4.8** Another recurring theme where respondents wanted more clarity was the Record’s use in assessment. Respondents raised concerns about how the Record could be applied in practice, given that ARB ‘would not assess the Record.’ Three respondents (13%) had suggestions or concerns about assessment. They included who the assessor of the Record would be, to whether it could be compatible with existing forms of assessment currently used by learning providers.

“The purpose of this record towards gaining Practice Outcomes through experience is unclear. The practice outcomes need to be tested for competency and parity by learning providers through; exams, case studies, interview or similar. Which then asks the question - why gain practical experience at all?”

*Academic (registered architect), London & South East*

- 4.9** An area of further uncertainty was the definition and application of supervision into the Record, raised by four respondents (17%). These responses asked that the Record was stronger on the roles of the ‘supervisor,’ the ‘mentor,’ and whether the Record had to be corroborated by a registered architect.
- 4.10** In the consultation, we did not specify who would corroborate the Record. Respondents raised this unprompted, with mixed views on whether the Record could only be corroborated by a registered architect. Some respondents thought it was important that only registered architects were able to undertake that role. Other respondents raised concerns about this approach, stating that trainees should be able to undertake practical experience through a range of employers, including non-architectural practices (such as wider built-environment employers). Respondents further highlighted that even within architectural practices, the mentor that trainees might be working with might not be a UK-registered architect, which would impact their ability to corroborate the Record should such a requirement exist.

“[...] at least the Professionalism and Ethics Competences for Practice outcomes must be signed by a registered Architect in the [Record]. Specifically, PE4, PE5 and PE6 that relate to upholding the architects’ obligations to H&S, and environment, recognizing the responsibilities of architects.”

*Academic (registered architect), London & South East*

## Remit

- 4.11** We received five (6%) responses where respondents thought the proposal was outside of ARB’s remit. Three of those respondents strongly disagreed with the proposal, while two were neutral.

## Suggestions

- 4.12** We received suggestions from 42 respondents on the implementation and use of the Record.
- 4.13** These suggestions included ideas for how trainees might use the Record effectively (5 respondents, 6%). Respondents suggested the Record be aligned toward the trainee rather than their qualification, enabling them to use the Record across their initial education and training. They recommended that the Record is ‘owned’ by the trainee and is their responsibility, with ARB setting requirements on how rigorously the Record should be completed. These responses further suggested that ARB highlight clearly how trainees may

look to mitigate gaps in their experience that the Record would highlight and offer advice on how trainees should focus on quality of experience gained to discourage them from rushing through their practical experience.

- 4.14** We received 15 responses (17%) that offered suggestions for the format of the Record. Responses included considering the RIBA PEDR as a format, and that the Record be mapped to the RIBA work stages, as those were common practice at employers and could guarantee familiarity with use.

"I believe that the training record should be designed by each learning provider. in any case, I would prefer a simple, straightforward template, ideally based on Word or similar and not necessarily online. It could be live via existing available software and students complete it as a contemporaneous record rather than the PEDR which is handed over like a baton. All those involved others such as employer mentor and PSA, should be able to view should have viewing, if not editing rights."

*Academic (registered architect)*

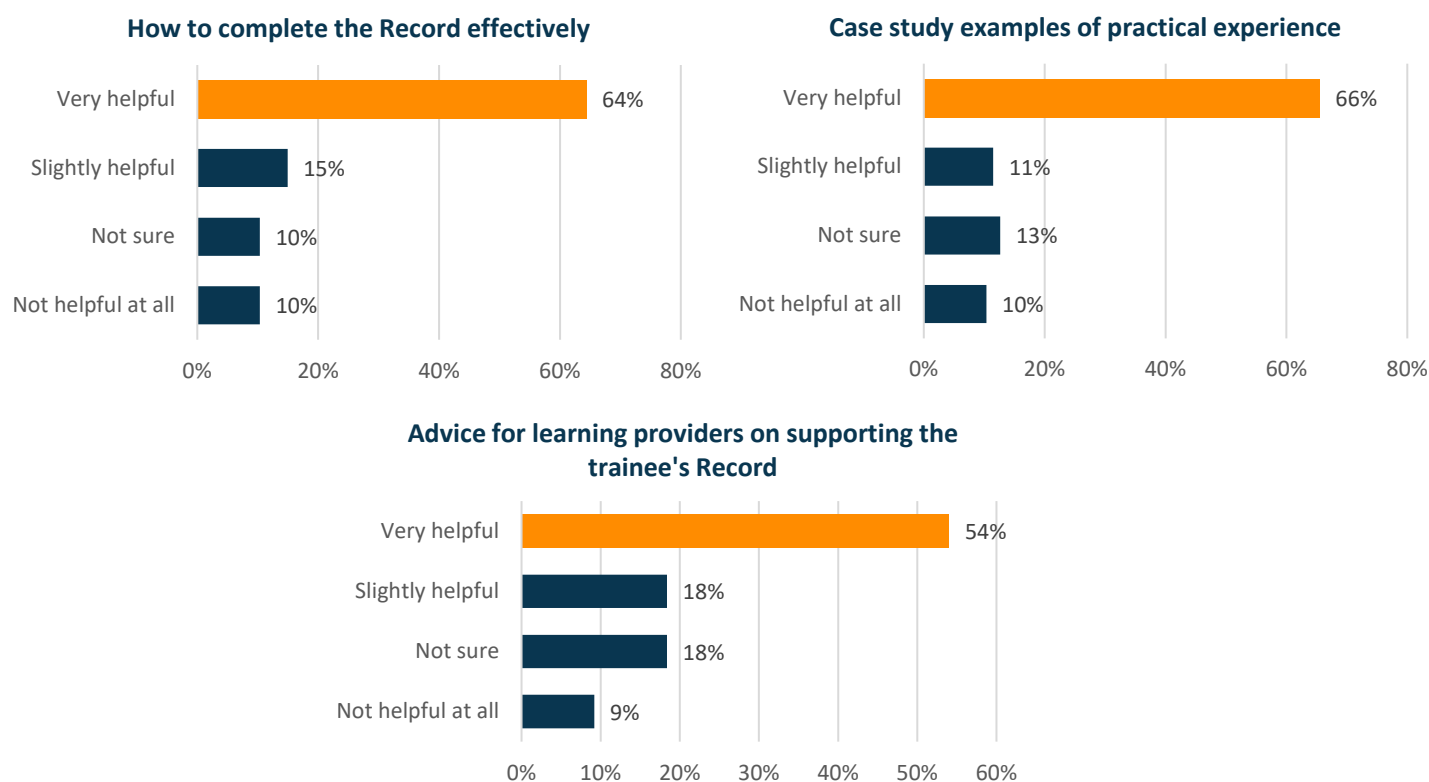
"Case studies should be from a broad range of practices - i.e. small, large, front-end-only, delivery-only, and ideally an example from a non-practice based trainee (i.e. someone working in local authority or for a contractor)."

*Registered Architect, East Midlands*

- 4.15** Respondents suggested that the Record clearly demonstrate the range of experience a trainee should undertake in gaining their Practice Outcomes. They thought the trainee should be able to record their own experience as they preferred, rather than a prescriptive form; the requirements should be on the range of experience they should record against. Alongside further clarification on whether the Record would allow trainees to log experience as "participants or observers," there was a theme across the suggestions on the ability of the Record to track experience at different stages and across different types of participation.
- 4.16** We received comments about trainees using the Record to reflect on their experience. Two respondents (2%) specifically reiterated the importance of reflection within the Record. Respondents also suggested that the Record should have stronger requirements on logging reflections and that examples of completed Records could be made available to trainees to understand how reflection could be undertaken. One thought it was important that that trainees could log experience and reflection retrospectively, to enable the Record to work for non-traditional routes.
- 4.17** Five respondents (6%) offered suggestions on how the Record could be corroborated. One respondent suggested that more onus be put on the employer to enable the Record to be effectively used. Another recommended ARB require employment corroborators (whether those be employment mentors or supervisors) to undertake mandatory CPD to enable them to contribute to the Record effectively.

## Advice topics

**Figure 4.3: To what extent do you agree with the proposed advice topics? (number of responses)**



**4.18** We asked for views on whether advice topics would be helpful alongside the Record. We proposed three areas for advice, and asked respondents whether there were further areas we could consider.

**4.19** Respondents were very positive towards each of these. For advice on how to complete the Record effectively, 56 respondents (64%) found these very helpful. Fifty-seven respondents (66%) found case study examples of practical experience very helpful. The number was slightly less for advice to learning providers on supporting trainee Records, with 47 respondents (54%) finding this very helpful.

**4.20** As well as respondents saying whether they thought the advice topics were helpful, we received 23 responses (26%) with further suggestions about topics that could accompany the Record.



“Regarding the proposed case study examples, it is unclear what these examples might be. Will they outline the different contexts in which experience might be gained, including practice types, project types, activities that might be undertaken? The proposals indicate that the examples will help ‘trainees to understand the Outcomes they need.’ There are two concerns about this. One is that this advice might be misinterpreted as elaboration about the Outcomes and hence misconstrued as additional requirements that need to be met. The other is that this advice is not proposed for the Academic Outcomes, so there could be some confusion about the status of the advice.”

APSA

**4.21** Respondents wanted the Record to accommodate trainees that might be unable to rely on their learning providers or employers to corroborate their experience, including instances where employers changed / mentors were unavailable. They suggested dedicated persons outside of the trainee’s employment could be involved in their Record to act as tertiary advice for the trainee.

**4.22** Further suggestions for updates to the proposals were:

- Clear instructions for completing the TRE, including when to complete it and instructions for who and how to contact relevant individuals for advice on logging
- How to evidence past experience, how to identify gaps across different types of employment, how to map practice environments to the Practice Outcomes
- Advice for employers on how to contribute to the Record, what constitutes adequate corroboration, scenario-based examples of good mentoring
- Advice for learning providers and PSAs (Professional Studies Advisors) on the importance of their role, responsibilities of PSAs, expected engagement with the Record given that the trainee would be in practice
- Examples of reflective writing and competency mapping, guidance on data protection, and suggestions that trainees and their mentors attend regular reviews to review Record progress

## Conclusions

Strong levels of agreement with the minimum requirements indicate that the proposed requirements will encourage a consistent approach to recording practical experience. Respondents suggested detailed considerations for how the Record could be best utilised, and we will consider these as we finalise the minimum requirements and consider the format of the Record.

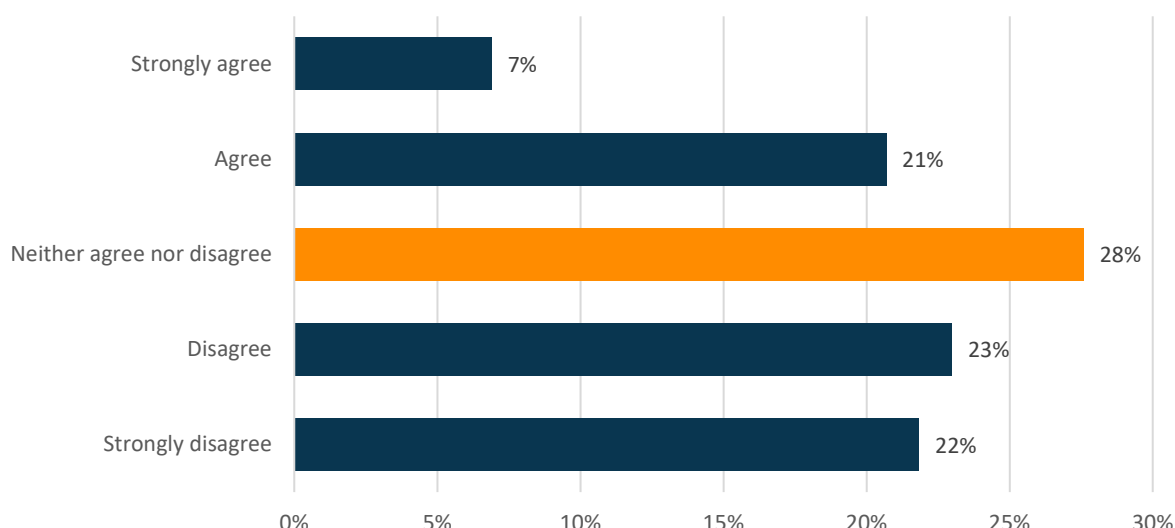
We will introduce additional minimum requirements for the Record to ensure it follows Government standards for accessibility and data collection, to ensure it can remain transferable and flexible to accommodate the variety of ways in which experience can be gained.

Once finalised, we will clearly communicate which formats of the Record meet our minimum requirements, so that learning providers, employers, and trainees are informed.

# Changes to Registration Rules

- 5.1** The Registration Rules set out ARB's policies and process relating to registration matters, such as how qualified individuals can become registered for the first time. We proposed changes to these, the main one being the removal of the requirement that applicants for registration have at least two years of practical experience.
- 5.2** Feedback on the changes was mixed. The most common response was neither agree nor disagree (24, 28%). There were more respondents disagreeing (39, 45%) than agreeing (24, 28%):

**Figure 5.1: To what extent do you agree with the draft changes to the Registration Rules? (% of responses)**



- 5.3** Common themes respondents shared within open text responses were:
- Concern that the change would lower standards of the profession (14, 16%).
  - Concern about the perception it would give trainees of the time required and therefore their expectations of how long their training would take (20, 23%).
  - That time in practice was itself a valuable measured outcome (19, 22%).
  - That the minimum time helps employers to structure experience and manages their own expectations of trainees (8, 9%).

“Removing the 2 year experience as entry to the register and 12 months under an architect mentor in the UK is going to have a huge impact on the practical knowledge of the trainee. Of all the current elements of the path to registration this is probably one of the more useful parts.”

*Registered architect, South West*

“There should be a minimum of 2 years working in practice, and this should not be shortened. To be portrayed as a competent architect, there must be at least this time to gain experience working on a diverse range of projects, dealing with people, gaining practical experience. To reduce the 2 years will significantly reduce the competence and experience levels of someone becoming an 'Architect' in the eyes of the industry and society at large.”

*Registered architect, London & South East*

“Although the 2 year min. experience requirement has been a somewhat blunt instrument to reflect the breadth and depth of experience gained by a candidate, it has still be a useful benchmark for both us as learning providers looking at future enrolment, and for candidates considering pt 3 themselves to understand if they're likely to have met the basic criteria by interview stage.”

*Academic (registered architect), London & South East*

“The 2 year minimum guarantees to all parties that the individual has some real life experience in practice. Removing this minimum requirement is very likely to encourage more trainees to try and pass as quickly and possible and with a potential high risk of failure and retake which has a financial and emotional cost.”

*Registered architect, London & South East*

“We welcome the changes proposed to the registration rules and ARB’s aims, through the introduction of the coordinating role, to improve the consistency of practical experience and to remove the requirement that applicants for registration have at least two years of practical experience. [...] The time currently taken on average by a student to reach the point of registration is more than the current “standard” two-year period. Change must occur to ensure that students get the appropriate experience to reach the register in a timely fashion based on outcomes not periods of experience.”

*RIBA*

“We welcome the change to remove the requirement that applicants for registration have at least two years of practical experience and particularly subsequent removal of the double counting rule. If students are able to meet the relevant competences, then they should be eligible to join the register.”

*Learning Provider, Wales*

## Conclusions

We noted many respondents used their open text responses to talk about the package of proposals as a whole, rather than specifically the Rules. This may suggest confusion about the question and meaning of the Rules, with respondents interpreting it as whether they agree or disagree with all of the proposals. Some may have therefore disagreed, or indeed agreed, without necessarily agreeing or disagreeing specifically with the Rules.

Respondents expressed concern that removing the two-year minimum period of professional practical experience could be perceived as lowering standards, particularly where time in practice is seen as an established proxy for competence.

We have considered feedback carefully alongside our intent to remove the minimum requirements and the original rationale for an outcomes-based approach to competence.

The responses have also illustrated the need to communicate this clearly, particularly to manage expectations of trainees and their need to reach the required Competency Outcomes.

Alongside considering the main change to remove the two-year minimum, we will also review the detailed suggestions we have received, including any that propose improvements to the accuracy of the wording of the Rules.

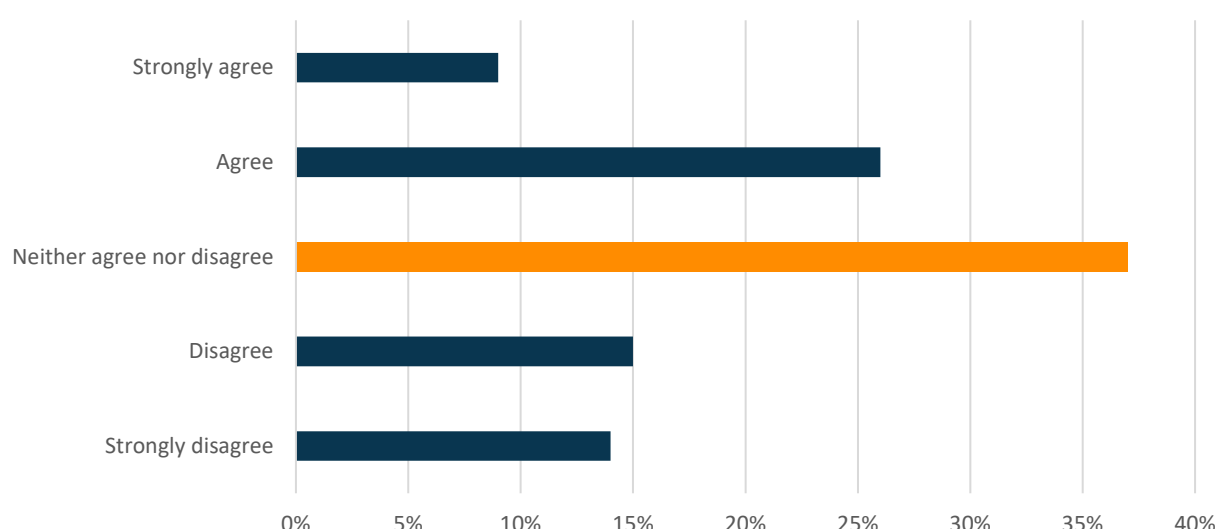
We received comments noting that many of the definitions within the previous Rules had been proposed to be removed. They would be removed because they only exist within the Rules to define terms that are used in setting the two year minimum. If the section of the Rules setting a two year minimum is removed, there is therefore no reason for those defining parts of the Rules to either exist. We will however instead use these comments as suggestions for what we should consider as important when considering the wider package of changes, particularly the guidance for trainees and employers.

# Other questions

## Supporting trainees

- 6.1** We explained that the coordinating role for learning providers, the Trainee Record of Experience and the guidance for both trainees and their employers are all intended to provide additional support for trainees. We then asked respondents whether they agree that these proposals will help trainees navigate their progress towards registration.
- 6.2** The most common response was neither agree nor disagree (32, 37%) but more respondents agreed (30, 34%) than disagreed (25, 29%):

**Figure 6.1: To what extent do you agree that these proposals will help trainees navigate their progress towards registration? (% of responses)**



- 6.3** Respondents could also add further information to explain their answer. Many of their comments and suggestions have been included in the analysis above. Other comments we received included:
- Workload challenges remain and it was important that these proposals did not add to those.
  - Important to maintain the balance to support trainees without adding unnecessary bureaucracy.
  - The proposals may move responsibility rather than adding meaningful new support to trainees.
  - That it would not solve underlying challenges in practice environments, such as workload, power imbalance.
  - Some emphasised that trainees should still be responsible for their own development and should not rely on providers.

- That a key part of the changes will be to communicate them clearly to trainees.
- The challenge for employers to understand the different models that might emerge, with this being necessary to understand the expertise trainees could bring to the practice and to support them.
- That it would be helpful if ARB regulated practices.

“The current system often places a disproportionate burden on trainees to independently manage and make sense of their professional development. Many struggle with understanding what constitutes appropriate experience, identifying gaps in their learning and accessing consistent advice and support. The proposed measures represent a positive and necessary shift toward a more supported and structured pathway.”

*Academic (registered architect), North West*

“Agree that trainees shouldn’t bare the full burden for navigating their way through professional practical experience and that the employer and learning provider should assist. However I do believe that does happen currently and all three do work together to navigate this.”

*Registered architect, East Midlands*

“These proposals collectively shift responsibility from trainees to a shared model where learning providers coordinate, employers, mentor, and the Trainee Record of Experience provides structure. The coordinating role ensures trainees have access to employer lists and advice, the TRE offers a clear framework for logging and reflecting on progress, and the guidance clarifies expectations for all parties. Together, they reduce the burden on trainees and create a more supportive, transparent pathway to registration which is crucial after such a huge investment of time, resources and monetary value by students.”

*Architecture Student – graduate (studying Part 2), South West*

“The coordinating role, the TRE, and the employer guidance together address the structural gaps that currently make the pathway opaque and unevenly supported.”

*Registered architect, London and South East*

“Institutions support students as far as practicable already. This proposal creates the illusion of support without any influence or control. It is important for students at this level of experience to be able to navigate working relationships and make career decisions independently. They are adults and need to be accorded that level of autonomy and responsibility - creating the illusion that universities will be able to swoop in and solve their problems is inaccurate and undermines both their relationship with their employer and universities relationships with industry.”

*Academic (registered architect), East Midlands*

“The employers absolutely need to carry some responsibility for training. Providers already carry a lot of the quality monitoring. However access to work is governed by the economy and the general state of the profession. The burden for finding a suitable placement cannot fully be with the providers but they can definitely assist as far as possible through networking support.”

*Registered architect, London & South East*

## Transition plans

- 6.4** We proposed that any changes would be phased in alongside new accredited qualifications as part of our transition, which will see all qualifications meet the Competency Outcomes (rather than the outgoing Criteria) by December 2028. We said this means we anticipate that existing Part 3 qualifications will observe the outgoing PPE requirements and new qualifications will observe the new PPE requirements.
- 6.5** We asked respondents if they had any feedback on these plans and we received both suggestions for what the transition could be and things we should keep in mind as we decide it. We will consider these as we progress this work and decide a final timeline for the transition to the new requirements.

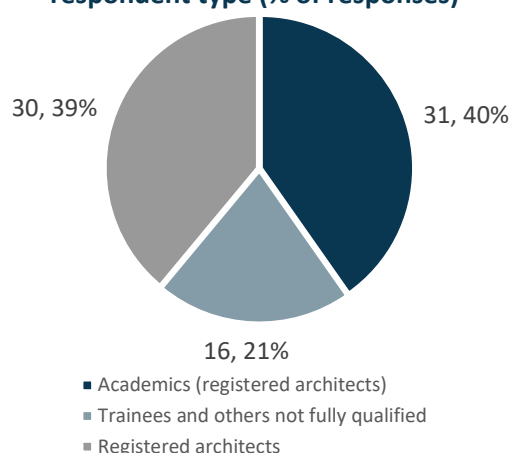
## Equality, diversity and inclusion

- 6.6** We asked respondents if they had any feedback about a positive or negative impact on equality, diversity and inclusion within any of our proposals. Fifty-one respondents (59%) shared views on this. Where respondents thought the proposals might have a negative impact, we tracked responses and categorised them into recurrent themes:
- Fewer qualifications: Increased pressure on learning providers due to the coordinating role limiting how many providers can offer courses, in turn affecting where trainees can undertake their qualifications
  - Costs being passed on to trainees: Increased resource pressure for learning providers would result in higher costs to deliver the Practice Qualifications. These costs would be passed forward to trainees, resulting in higher tuition fees, therefore leading to only those from advantaged socio-economic backgrounds being able to undertake all the necessary qualifications and training
  - Higher expectations of employers: could reduce how many employers would employ them. If fewer employers could employ trainees, further bias in hiring could mean only select trainees (i.e. those from privileged backgrounds or with existing networks) would get hired, widening the diversity gap in the profession
- 6.7** These are risks that we had considered as part of creating the proposals. We will continue to consider them further as part of finalising the changes.

# Annexe A - Who responded

- 7.1** The consultation was open between 15 January and 15 April 2026. During that time, we received 87 responses. Most (61, 70%) were registered architects and 31 of these (36% of the total respondents) were also academics. We also heard from trainees at different stages and others who are not yet fully qualified (16, 18%). The highest group of respondents was from London and the South East (34, 39%) but a breadth of locations meant we obtained views from different nations and regions.

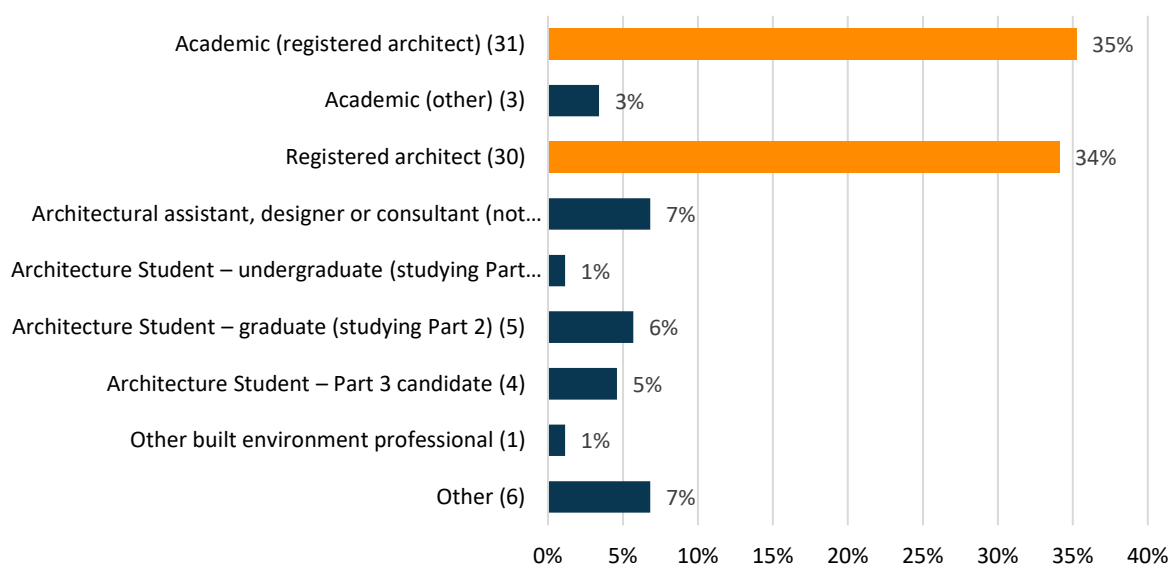
**Figure 7.1: Composition of respondents by respondent type (% of responses)**



- 7.2** Respondents were asked to identify themselves across categories including demographic information and their type of work or size of practice. Most responses (61, 69%) were from registered architects, and 31 of these (35%) were from those who are also academics.
- 7.3** In addition to the 31 academics (35%) who are also registered architects, we received another 3 responses (3%) from other academics. There were a further 6 respondents (7%) who selected architectural assistant, designer or consultant (not Part 3 qualified), followed by 6 respondents (7%) who selected other, which included international architects, chartered architectural technologists, and retired architects.
- 7.4** Ten trainees (13%) responded, and they could identify their stage of education and training: undergraduate architecture student studying Part 1 (1,1%), architecture graduate studying Part 2 (5, 6%); and architecture student – Part 3 candidate (4, 5%).



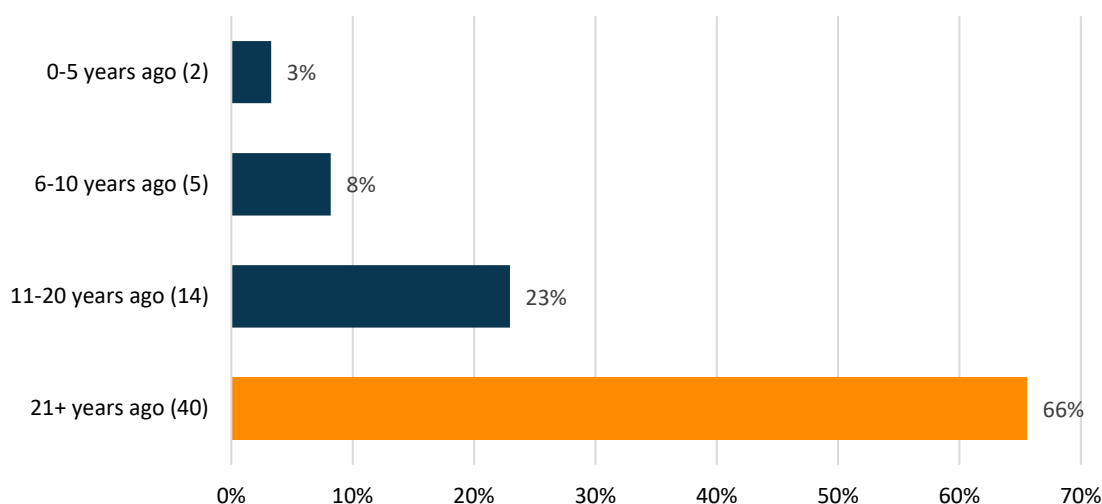
**Figure 7.2: Respondents organised by role (% of respondents)**



## Registered architects

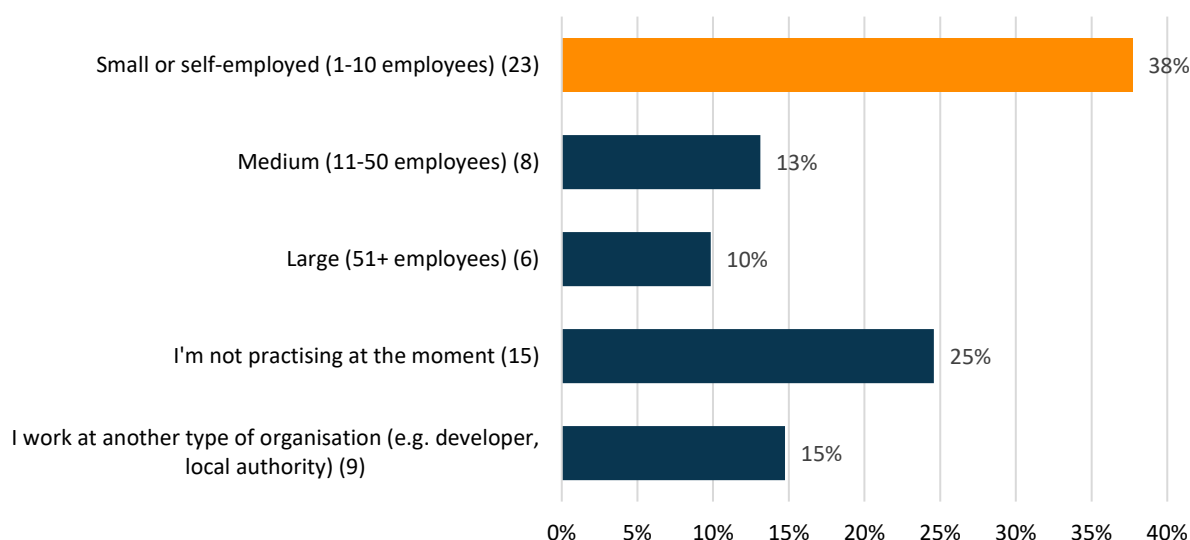
**7.5** Most registered architects qualified 21 or more years ago (40, 66%). Responses from remaining architects were spread across different times since becoming fully qualified. This included hearing from 2 (3%) who had recently qualified 0-5 years ago.

**Figure 7.3: Registered architects by time since qualified (% of architect respondents)**



**7.6** Among registered architects, we received responses from a range of practice sizes. They ranged from small or self-employed (23, 38%), medium (8, 13%) and large (6, 10%).

**Figure 7.4: Registered architects by type/size of practice (% of architect respondents)**



## Organisations

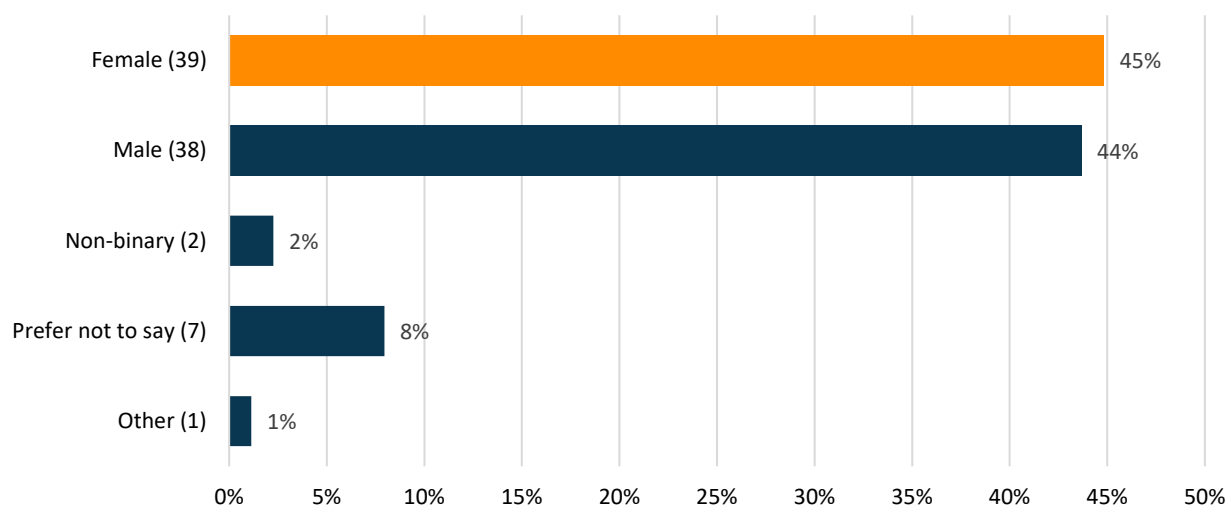
**7.7** Of the 87 responses we received, 19 (22%) were official responses on behalf of organisations. Nine (47%) were learning providers but they also included architectural practices, professional bodies and a local council. A full list of respondents who agreed to be identified is included in Annex A.

## Gender

**7.8** Thirty-nine respondents (45%) identified as female and 38 as male (44%). Two respondents (2%) identified as non-binary, 1 selected other (1%) and 7 (8%) chose not to state their gender. The proportion of female respondents is slightly higher than the demographics of the Register (which is 32%), with the proportion of men responding falling below their proportion on the Register (68%).<sup>2</sup>

<sup>2</sup> Register data is as of May 2024. Further information is available on ARB's website at <https://arb.org.uk/about-arb/equality-diversity/data>.

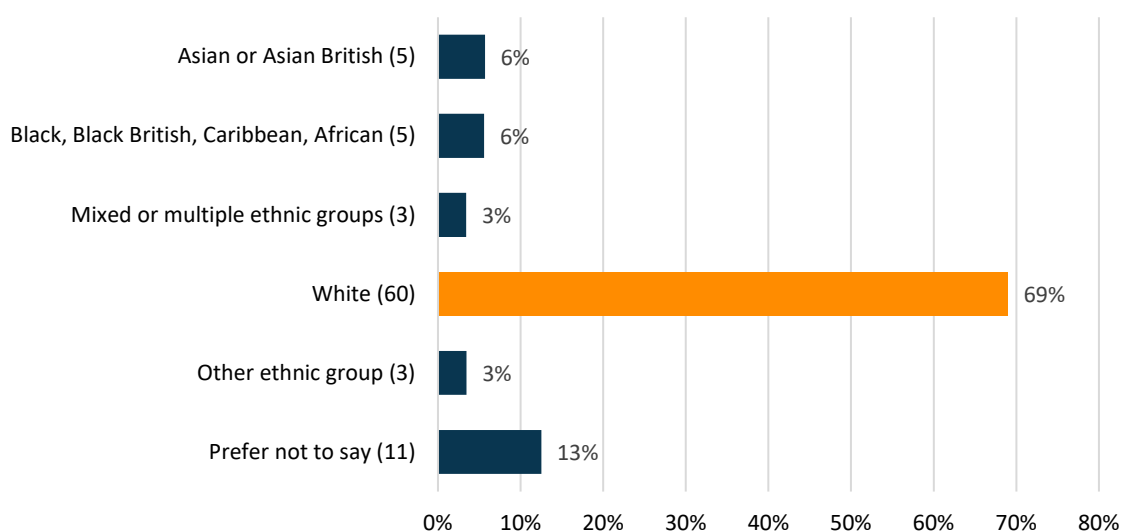
**Figure 7.5: Respondents organised by gender (% of respondents)**



## Ethnicity

**7.9** Respondents were asked which ethnic group they belong to. Most respondents (60, 69%) were white. This is lower than the demographics of the Register (81%), with Asian, Black, and mixed or multiple ethnic group respondents being slightly higher than their percentage of the Register.

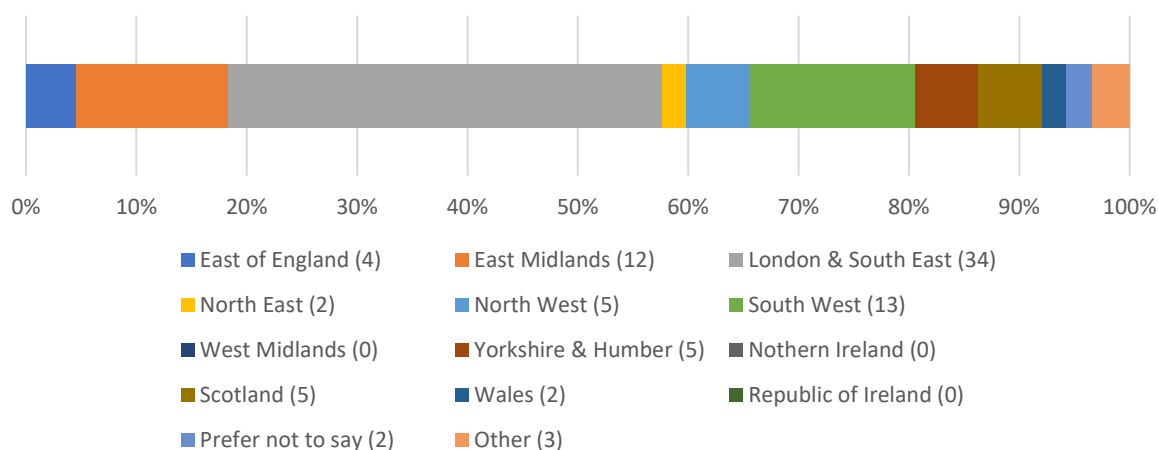
**Figure 7.6: Respondents organised by ethnicity (% of respondents)**



## Geographic spread of respondents

**7.10** Respondents were asked to identify the nations and regions that most closely described their place of residence. We received responses from each region, but the highest group were based in London and the South East (34, 39%), followed by the South West (13, 15%) as the second highest group and East Midlands (12, 14%) as the third highest group (See Figure 2.6). There were 3 respondents (3%) who selected other locations.

**Figure 7.7: Respondents organised by place of residence**



## Health

**7.11** We asked respondents whether they have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more. Eight (9%) respondents said they do, 64 (74%) do not and 15 (17%) preferred not to say.

# Annex B: Questions and respondents

## Questions we asked respondents

### Draft Standards for learning providers

- To what extent do you agree with the proposed changes to the Standards for learning providers?
- Are there any parts of the proposed changes to the Standards that providers would be unable to implement? If so, please also tell us why.
- Is there anything missing from the draft Handbook information that would help learning providers understand how to meet the new Standard?

### Guidance for employers and for trainees

- To what extent do you agree with the content of the guidance for employers?
- To what extent do you agree with the content of the guidance for trainees?

### Trainee Record of Experience

- To what extent do you agree with the minimum requirements?
- Advice topics - To what extent do you think each topic for advice would be helpful?
- Are there any further areas of advice that would help trainees or others use the Record?

### Registration Rules

- To what extent do you agree with the draft changes to the Registration Rules?
- To what extent do you agree that the draft changes to the Rules accurately implement the proposals?
- Is there any further feedback you would like to provide on the draft Rules?

### Other

- To what extent do you agree that these proposals will help trainees navigate their progress towards registration?
- Is there any feedback you wish to give about these transition plans?
- Is there any feedback you wish to give about a positive or negative impact on equality, diversity and inclusion within any of our proposals?
- Is there anything further you would like to tell us in relation to this consultation?

## List of respondents

There were 20 respondents who gave permission for their responses to be published in full, with a further 55 wishing to be published anonymously. Of those who wished for their responses to be published in full, 14 were registered architects and 10 of them were also academics.

19 responses were made on behalf of organisations, with 6 agreeing to be published in full.

The names of all individuals and organisations published in full are listed below.

- Alvaro costa de Jesus, Architecture student
- Andrew Harper, Academic
- Anthony Dalby, Academic (registered architect)
- Association of Professional Studies in Architecture
- Benedict Simon Vickery, Registered Architect
- Carl Meddings, Academic (registered architect)
- Centre for Alternative Technology
- John Richard Kellett, Registered Architect
- Jerome Brook, Registered Architect
- Lewis Cropley, Architecture student
- Oriana Fernandez, Registered Architect
- Paul Crosby, Academic (registered architect)
- Paul Jaques, Other
- Royal Institute of British Architects
- Samia Binte Mofiz, Architecture student
- Scott Batty, Academic (registered architect)
- Simon Kay-Jones, Academic (registered architect)
- Stephen McCusker, Academic (registered architect)
- University of Cambridge
- University of Kent

# Annex C: Qualitative analysis coding framework

| Standards for Learning Providers    |                                                                                                                                                                                                                                                              |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Unclear                             | <ul style="list-style-type: none"> <li>• Something is unclear</li> <li>• Requests for us to clarify something</li> </ul>                                                                                                                                     |
| AgreeIntent                         | Respondent agrees with the intent of the proposal.                                                                                                                                                                                                           |
| Resources                           | Concern about learning providers resourcing the coordinating role, any mentions about costs, hiring staff, budgets                                                                                                                                           |
| List                                | Concerns about the proposal to 'maintain a suitable list of employers'                                                                                                                                                                                       |
| EmpAdvice                           | Concerns about giving employment advice to trainees                                                                                                                                                                                                          |
| Provision                           | <ul style="list-style-type: none"> <li>• Will impact how many learning providers can offer courses</li> <li>• Will impact how many courses of a certain type (e.g. AO-only courses) will exist</li> <li>• Will impact trainee choice and movement</li> </ul> |
| Role                                | Comments that the overall coordinating role (or any of the requirements within it) should not be placed on learning providers.                                                                                                                               |
| Liability                           | Concern about legal implications on providers due to the role.                                                                                                                                                                                               |
| Variation                           | Concern about how providers can be assured about the quality of experience when it varies                                                                                                                                                                    |
| Suggestion                          | New suggestions                                                                                                                                                                                                                                              |
| Guidance for employers and trainees |                                                                                                                                                                                                                                                              |
| Unclear                             | <ul style="list-style-type: none"> <li>• Something is unclear</li> <li>• Requests for us to clarify something</li> </ul>                                                                                                                                     |
| Suggestion                          | New suggestions                                                                                                                                                                                                                                              |
| LimitAccess                         | Comments that it would limit how many employers offer training, where trainees can seek training, any risks around less employers in the system                                                                                                              |
| ARBRemit                            | Disagree with us providing this as it is outside our remit, eg something about regulating practices. This is for any concerns beyond how the guidance would work in practice.                                                                                |
| Trainee Record of Experience        |                                                                                                                                                                                                                                                              |
| Unclear                             | <ul style="list-style-type: none"> <li>• Something is unclear</li> <li>• Requests for us to clarify something</li> </ul>                                                                                                                                     |
| Suggestion                          | New suggestions                                                                                                                                                                                                                                              |
| ARBRemit                            | Disagree with the proposal entirely, not ARB's role to develop/require Record                                                                                                                                                                                |

| Registration Rules |                                                                                                                                                            |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Standards          | Concern that it would lower standards                                                                                                                      |
| Expectation        | Concern about perception of time required, trainee expectations would change, employer expectations would change, rushed experience, negative consequences |
| Time               | Time itself is a valuable and measurable outcome, benefits of counting 'time'                                                                              |
| Practice           | How time helps employers to structure experience, manage expectations                                                                                      |

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](mailto:info@arb.org.uk)
- call 020 7580 5861
- write to us at ARB, 70 Grays Inn Road, London WC1X 8NH

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



# Consultation material

## Standards for Learning Providers

### Standard 6: Student Support

Students are provided with a safe and supportive learning environment which enables them to achieve the Outcomes and prepares them to practise as an architect.

Providers will be able to demonstrate that they can meet this standard by:

~~6.2 Ensuring that students have access to guidance and support to access work-based learning where it is a requirement of the qualification.~~

6.2 Taking a coordinating role in facilitating trainees' acquisition of the Practice Outcomes, where it is a requirement of the qualification.

Coordination will include using an ARB approved Trainee Record of Experience to support trainees in understanding their progression towards achieving the Practice Outcomes, maintaining a list of suitable employers, and offering advice where trainees have concerns about their employment.

~~For qualifications that will include a work placement (including apprenticeships); the application will contain an overview of the provider's and employer's commitments and responsibilities during the period(s) that students will be in the workplace; and how the provider will monitor those placements. This will include the frequency and nature of the provider's contact with the employer and with the students.~~

### **Further information that would be included in the Accreditation Handbook**

For qualifications that require a demonstration of the Practice Outcomes through practical experience, the application will evidence the coordinating role the provider has taken to facilitate the trainees' experience through employment. That coordinating role will include:

- An appointed individual/s provided with sufficient resource to coordinate the provider's relationship with employers.
- Offering support to trainees to help them find available work placements, including maintaining a list of potential employers to aid them.
- Reasonable assurance that those on the list of available employers are, and remain, suitable practices at which trainees can acquire relevant experience to meet the Practice Outcomes. While the employer does not need to be geographically close to the provider, the provider should be able to maintain contact with the employer for this assurance. It is also recommended that trainees gain experience within the UK as this will help them meet the Outcomes covering regulations, standards, codes of practice and policies related to the development of the built environment.
- Making trainees and employers aware of the ARB guidance on Professional Practical Experience.
- Providing advice to trainees where they have shared concerns about workplace behaviour or employment conditions, referring them to specialist organisations where appropriate.
- Providing trainees with an ARB approved Trainee Record of Experience, in which they will record their progress towards meeting the Practice Outcomes.
- Using the ARB approved Trainee Record of Experience to individually advise trainees about what practical experience they require to meet the Practice Outcomes, how they can acquire it and reflecting with them on their progress.

# Proposals after consultation

## Standards for Learning Providers

### Standard 6: Trainee support

**Trainees are provided with a safe and supportive learning environment which enables them to achieve the Outcomes and prepares them to practise as an architect.**

Providers will be able to demonstrate meeting this standard by:

- 6.1 Having policies, procedures and resources that ensure timely access to trainee support in relation to:
  - a. discrimination
  - b. bullying & harassment
  - c. pastoral care
- 6.2 Providing accurate information to applicants and trainees on routes to registering as an architect, maintaining individualised monitoring and oversight of their progression while enrolled on the qualification.
- 6.3 Ensuring that trainees have access to guidance and support on practical experience, while they are enrolled on the qualification.
- 6.4 Having systems in place to identify and support trainees whose performance or progress causes concern.

# Guidance for employers of trainees

**August 2026**

This guidance is intended to come into force in December 2028, in line with our transition to the new education framework and new requirements for professional practical experience. We have published it before this date to provide advice on the characteristics of good professional practical experience.

## Introduction

Taking on a trainee brings real benefits to an employer: new ideas, extra capacity, and the chance to shape the next generation of professionals. It is also a serious responsibility.

An important part of a trainee's employment is to gain the practical experience necessary to meet ARB's Practice Outcomes, building on and complementing the rest of their education and training. Helping them gain the most from their experience requires commitment from senior leadership to create a workplace that supports their development, with proper supervision, and a structured environment in which the trainee can learn safely and effectively.

This guidance sets out the responsibilities of employers when providing professional practical experience to a trainee as part of their qualifications. It is advisory, but reflects the professional expectations within the ARB Code of Conduct.

## 1. Workplace culture

- Employers should recognise the important role they have in setting a positive workplace culture and shaping the attitudes of future architects.
- Employers should ensure a working environment free from discrimination, harassment, victimisation or inappropriate behaviour.
- Leaders should understand and manage the imbalance of power that exists between senior staff and trainees. Professional boundaries should be strictly maintained.
- Concerns raised by the trainee should be taken seriously, recorded properly, and acted on.

## 2. Employment status, contract and pay

- Any employees must have a written employment contract setting out duties, supervision arrangements, working hours, pay and terms.

- Any employees must be paid at least the National Living Wage (or the National Minimum Wage if they are under 21).

### **3. Structured work and purpose of employment**

- An important part of a trainee's employment is for them to acquire the experience necessary to meet the Practice Outcomes. Work given to the trainee should therefore be structured, planned and appropriately sequenced in a way that balances the trainee's goals with the needs of the employer—not always simply whatever happens to be available.
- As far as possible, employers should ensure the trainee has opportunities to gain experience across different stages of work. Considering opportunities across your organisation may help them to do this.
- Employers should be mindful that trainees may have competing demands on their time from their work and education. It is therefore important to be clear about expected work hours and nature of a role when advertising it, so that trainees can decide whether it is appropriate for them. Where possible, employers should allow time away from work for essential academic activities. Coordination and communication with a trainee and their learning provider will help to anticipate and manage these situations.

### **4. Objectives, progression and the Trainee Record of Experience**

- Trainees will join employers with different levels of experience and will be at different stages of their initial education and training. ARB's reforms to the education framework mean this may also be different to what employers have been familiar with.
- Trainees should receive a structured induction covering:
  - The employer's policies and procedures.
  - Health and safety.
  - Expected standards of behaviour.
  - Confidentiality and data protection.
  - How and when they will receive supervision.
- Clear objectives should be agreed at the outset and revisited regularly to help the trainee reflect on their progress. Trainees should receive constructive, honest feedback throughout their period of employment. Employers should also be open to feedback from trainees on their experience, and act upon it where it might improve future training opportunities.
- The Trainee Record of Experience (the Record) should help to do this and ensure the discussion is focused on helping the trainee to acquire the experience they need.

- Trainees should be accurately and promptly maintaining their Record. Employers should help them do this by also promptly and accurately providing them with any information and support they need to complete their Record.
- Record entries should be promptly and accurately corroborated. The Record should be corroborated by a registered architect. This would give the trainee and others involved in supporting them more assurance about the experience they've gained. A trainee's provider may choose to use the Record as part of assessment towards their qualifications. As part of this, they might set additional requirements on their trainees surrounding its use, such as who should corroborate the experience recorded.
- The aim of corroborating is to confirm the trainee's recording of the experience, helping them, you and their provider to understand their progress, not to necessarily assess the quality of their work.

## 5. Other support and supervision

- The Architects Act 1997 is clear that if a trainee is working at a company whose name includes 'architect', their architectural work must be carried on under the supervision of a registered architect. Alongside the situations in which this is required, during a trainee's employment, a range of professionals may be capable of giving oversight, training and support to carry out tasks safely and competently. Employers should ensure trainees receive this.
- Every trainee should be assigned a mentor who oversees, coordinates, and reviews the trainee's experience during their time in professional practice. A mentor can be any professional but should have appropriate experience and enough time and resource to carry out the role properly. ARB's mentoring guidance<sup>1</sup> contains further information on what mentoring is and what architects should do to comply with the Code if they are acting as a mentor.
- Trainees should have reasonable access to senior staff for questions, technical guidance and reflection.
- As with any employee, trainees' personal circumstances may affect their time in work and their training. Employers should be open to supporting them where possible.

## 6. Coordination with learning providers

- For qualifications where it is a requirement to meet the Practice Outcomes, a trainee's learning provider will:
  - Have used a Trainee Record of Experience that meets ARB's requirements to individually advise the trainee about what practical experience they require to meet the Practice Outcomes, discussed how they can acquire it and will reflect with them on their progress.

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<sup>1</sup> <https://arb.org.uk/architect-information/architects-code-standards-of-conduct-and-practice/>

- Maintain contact with the trainee and their employer during any periods of employment during the qualification
  - Assist the trainee if they have shared concerns about workplace behaviour or employment conditions, referring them to specialist organisations where this is more appropriate.
- It can be helpful to learning providers if an employer provides feedback to them on what support and advice could be provided to improve the experience for future trainees.

DRAFT

# Guidance for trainees undertaking professional practical experience

August 2026

This guidance is intended to come into force in December 2028, in line with our transition to the new education framework and new requirements for professional practical experience. We have published it before this date to provide advice on the characteristics of good professional practical experience.

## Introduction

A period of practical experience is a vital part of becoming an architect. It allows you to apply and build on what you've learned, develop professional judgement, and undertake the activities you need to meet ARB's Practice Outcomes.

This guidance sets out what is expected of you and how to make the most of your time during your time in professional practice. It complements the guidance issued to employers so that everyone understands their role in making the experience productive, fair and professionally meaningful.

Gaining practical experience is a vital part of your progress towards registration. In recognition of this, if your qualification requires you to acquire the Practice Outcomes, ARB requires your learning provider to support you. This should include maintaining contact with you and your employer during periods of employment during your qualification. It should also include adapting their monitoring, oversight and support role towards helping you acquire the Practice Outcomes. How this is done will vary between providers, depending on their circumstances.

From December 2028, trainees will not need to have completed a minimum time in practical experience to register with ARB. However, it will be essential to meet the Competency Outcomes and to gain qualifications that demonstrate this. The time required to do this will vary and it may take more than two years of time in practice.

## 1. Finding experience opportunities

- While your learning provider should help you, it ultimately remains your responsibility to find suitable opportunities, and you should not rely on them to do this for you unless they have said they will. You should consider whether the employer is one where you can acquire the experience you need to meet the Practice Outcomes, as well as the support you can expect to be available to you and the compatibility of the employer with your own personal preferences. Both this guidance and ARB's guidance for employers provide further information on the characteristics of a suitable employer.



- You should gain experience on UK-based projects as this will help you meet the Outcomes covering regulations, standards, codes of practice and policies related to the development of the built environment.

## **2. Understand the purpose of practical experience**

- Your primary purpose during this period is to gain experience that helps you meet the Practice Outcomes set by your learning provider and ARB.
- While support should be available to you, it is important that you also take responsibility and ownership of your own experience and development. Be proactive in seeking out learning opportunities, asking questions and engaging with the work you're given.

## **3. Act professionally**

- You are expected to conduct yourself with the same professionalism you would show as a registered architect: reliability, punctuality, respect and integrity. Although you are not yet an architect, you should understand and act in accordance with the Architects Code of Conduct and Practice.
- Understand that it is a significant commitment for an employer to offer professional practical experience. Make an effort to learn, collaborate, share information and support your colleagues whenever you can.
- Follow your employer's policies, including confidentiality, data protection, and health and safety procedures.
- If you're unsure about anything—especially legal or safety issues—ask before acting. You should expect to have support from senior staff when you need it.

## **4. Commit to your learning**

- You should receive a structured induction. Engage fully with the induction process and make sure you understand how your time in professional practice will work.
- Understand what experience you need to complete your Practice Outcomes and your qualification. Your learning provider should help you do this and you should regularly discuss with your employer the plan for acquiring it.
- If you feel you don't understand a task, or haven't been shown enough to complete it safely, say so promptly.
- Discuss with your employer any personal circumstances that might affect your training.

## **5. Objectives, progression and your Trainee Record of Experience**

- You are responsible for maintaining your Trainee Record of Experience (your Record) accurately and promptly.

- Clear objectives should be agreed between you and your employer at the outset, then revisited regularly as part of reflecting on your progress. The Record should help to do this and ensure the discussion is focused on helping you to acquire the experience you need.
- Keep notes to help you record and reflect on your experience—don't try to reconstruct months of work at the end.
- Your Record should be corroborated by a registered architect. This would give you and others involved in supporting you more assurance about the experience you've gained. Your learning provider may choose to use the Record as part of assessment towards your qualifications. As part of this, they might set additional requirements on you surrounding its use, such as who should corroborate the experience recorded.

The aim of corroborating is to confirm your recording of the experience, helping you, your employer and learning provider to understand your progress, not to necessarily assess the quality of your work.

- As far as possible, employers should ensure you have opportunities to gain experience across different stages of work.
- During your practice-level qualification, there may be occasions when you struggle to gain the experience you need to demonstrate acquisition of the Practice Outcomes to a provider. In this situation, while providers may not be able to guarantee or secure experience for you, they should have a strategy for support and guidance on alternative options to give you the best possible opportunity to complete your qualification.

## 6. Other support and supervision

- During your employment, a range of professionals may be capable of giving oversight, training and support to help you carry out tasks safely and competently. ARB's guidance to employers says they should ensure you receive this.
- ARB's guidance to employers also says you should be assigned a mentor who oversees, coordinates, and reviews your experience during your time in professional practice. A mentor can be any professional but should have appropriate experience and enough time and resource to carry out the role properly. ARB's mentoring guidance contains further information on what mentoring is and what architects should do to comply with the Code if they are acting as a mentor.
- Be open to constructive feedback, even when it's uncomfortable—it's part of becoming a competent architect.
- Give feedback respectfully where asked, especially if parts of your experience are not working well.
- If you are struggling or feel overwhelmed, tell a mentor or someone else supporting you early rather than waiting for problems to escalate.

## 7. Conditions and concerns

- Your employer should understand and meet their legal obligations towards you, including on pay and working conditions. If you are an employee (as opposed to being self-employed) then you must be provided with a contract of employment and be paid the National Living Wage (or the National Minimum Wage if you are under 21).
- Your employer should be mindful that you may have competing demands on your time from work and education. They should be clear about expected work hours when advertising a role, so that you can decide whether it is appropriate for you. Where possible, they should allow time away from work for your essential academic activities. Coordination and communication between you, your employer and your learning provider will help to anticipate and manage these situations.
- If you experience discrimination, harassment, or behaviour that feels inappropriate or unsafe, raise it with a mentor, your supervising architect or other senior staff at the employer, or your learning provider. Your learning provider might not be able to intervene directly but should be able to provide assistance or direct you to another specialist organisation that can assist you.
- If concerns are not resolved, or raising them internally is not appropriate, then use the ARB Guidance on 'Raising Concerns and Whistleblowing'<sup>2</sup> to better understand your options for escalating them. There is also advice on ARB's website if you have concerns about employers, including other organisations that might be able to help you<sup>3</sup>. You do not have to stay quiet – there will be support for you.

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<sup>2</sup> See guidance section: [Architects Code: Standards of Conduct and Practice](#)

<sup>3</sup> See employer section: [Complaints and concerns about architects](#)

# Minimum requirements for a Trainee Record of Experience and topics for supplementary advice

## August 2026 Purpose

The Trainee Record of Experience (or, the Record) will act as a tracking tool for trainees to log the practical experience they gain during their journey to registration. It will support them by acting as a record of their experience undertaken, but not as an assessment of their performance while undertaking that experience.

The Record will not be assessed by ARB at the point of registration. Instead, it is a tool to support trainees in their progress towards qualification, and learning providers in understanding the nature of practical experience the trainee has gained relevant to the Practice Outcomes.

It will enable trainees to identify - and highlight to their learning providers and employers - gaps in their practical experience, so that the trainee and others involved in their training can address those gaps. Ultimately, the Record will be a tool that better supports trainees to undertake high quality, relevant, and appropriate practical experience.

## Requirements

The Record will:

1. Map to the relevant Practice Outcomes.
2. Provide a standardised format to log experience.
3. Provide a standardised format to reflect on the experience completed.
4. Provide a standardised format for recording corroboration from relevant individuals, which is available to the trainee and other relevant individuals.
5. Be formatted in a way that helps demonstrate achievement of experience and clearly illustrate gaps in experience, so that trainees, their learning providers, and employers have a shared understanding of these gaps.
6. Be transferrable and usable between a trainee's time at successive employers and/or learning providers.

7. Be flexible in its format to accommodate the variety of qualification routes and different formats in which experience can be gained.

The Record provider will:

1. Ensure learning providers and trainees undertaking relevant ARB-accredited programmes are able to use their Record without disproportionate restrictions.
2. Ensure any costs for users of the Record are kept proportionate. Financial responsibilities passed on to trainees should be appropriately considered, with any changes to costs communicated in advance.
3. Ensure their Record, and any updates to it, meet accepted standards of accessibility (such as WCAG 2.2)
4. Ensure their Record complies with all relevant standard data collection legislation and principles.
5. Develop guidance on how to use their Record effectively, in agreement with ARB.

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# ARB's Registration Rules

Architects Registration Board

**Proposed changes after consultation**  
**August 2026**

# ARB's Registration Rules

## 4. Qualifications and practical experience

4.1 The qualifications and practical experience prescribed by the ARB pursuant to section 4(1)(a) of the Act are that the person:

(a) holds qualifications listed in Schedule 1 of these rules at the date conferred on the applicant at:

- (i) Part 1, Part 2 and Part 3; or
- (ii) Master's level and Practice level

4.2 Schedule 1 is published on the ARB's website.