Royal Institute of British Architects

Architects Registration Board: Consultation on education and training reforms – Tomorrow's architects May 2023

The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

The Royal Institute of British Architects (RIBA) welcomes the acknowledgement by the Architects Registration Board (ARB) that change needs to be made to the current model of architectural education to encourage a more accessible, inclusive and diverse profession.

We believe that graduates entering the profession must feel that they have the competence required to practice, the ability to be agile thinkers and to adapt to an ever-changing world. Architectural education must recognise the shifting context of the profession, and the political and economic factors driving the built environment.

We recognise that dialogue across the architecture sector – between academia and practice – is critical. Academia must address the needs of architectural practice and practice must take greater responsibility for the appropriate training of those who have yet to reach the Register. It is time to develop education structures which ensure fair access for a diverse range of students, support well-being and address matters of competence.

RIBA fully understands that many of the issues within education are difficult to address without consequence, either from a regulatory, institutional or education position. We are committed to working with ARB to find meaningful solutions to these issues.

To ensure an inclusive, well-rounded profession, RIBA believes the following is required:

- 1. Change to the current model of architectural education to encourage a more accessible, inclusive, and diverse profession. To achieve this:
 - a) The Register must be accessible from a number of different routes.
 - b) The value of a Part 1 qualification to be recognised but not essential for access to the Register.
 - c) Routes must equate to 600 credits of academic study.

RIBA 👾 Architecture.com

Royal Institute of British Architects 66 Portland Place London, W1B 1AD, UK Dr Jenny Russell Director of Education & Learning education@riba.org

Incorporated by Royal Charter No. RC000484 Registered Charity No. 210566 VAT Registration No. 232 351 891

- d) The requirement of Part 1 for international architects wanting to access the Register must be removed.
- e) Access should be granted to (restricted) title upon graduation in line with other regulated professions.
- f) The funding of architectural education must be improved.
- g) Inconsistency between ARB prescription and RIBA validation criteria must be avoided.
- 2. Reform of professional, practical experience to ensure that students have access to the necessary experience in order to access the Register:
 - a) Practices must recognise their role in the training of future generations.
 - b) Non-traditional practice-based routes must be encouraged and supported.
- 3. Early-career professionals must not be left in an unfocussed cycle of practical experience.
 - a) The competences required of students must be compatible with the length of time of study.
 - b) Students must be able to integrate their skills and knowledge into the design process.
 - c) Recognition of the ongoing education and professional development of an architect is important.

13. To what extent do you agree that ARB's proposed regulatory framework will meet our aim and help to achieve our vision?

We're particularly keen to hear your views on the new framework regarding:

- whether the new, wider range of entry points will improve accessibility into the profession;
- whether the move to outcomes will help to improve innovation and flexibility for learning providers;
- any funding or wider resource implications (in any part of the UK) as a result of our proposal to accredit only at two points or the setting of new competency outcomes.
- whether this new regulatory framework is compatible and will work well with apprenticeships and other work-based qualifications that may emerge in the future.

RIBA are concerned that the proposals presented by ARB does not fully address the critical transformation required to architectural education to make it fit for the future. The framework presented does not adequately address the areas where change is required and instead proposes structural changes which could risk undermining the UK architectural education system.

We consider ARB's proposal to remove the titles Parts 1, 2 and 3 to be unwise. There is significant value attributed internationally to UK architectural education and the Part 1, 2 and 3 education process. The highly regarded global perception of UK-educated and trained architects is compromised by these proposals. Whilst the UK's exit from the European Union means there is no longer a requirement for the UK to align with the Mutual Recognition of Professional Qualifications



Royal Institute of British Architects

Directive or the Bologna Accord; removing the globally recognised 3+2 education system risks cutting students off from accessing international opportunities and may restrict their portability.

The new framework is designed around a Master's Programme, in which it must be shown that all outcomes can be met. However, the removal of the requirement for a 5-year education may undermine the ability for UK universities to attract international students since a 5-year programme is the global norm. These students both enrich the educational experience of the student cohort and, notably, are an important income stream for universities. The loss of these students will diminish the income of schools of architecture and will likely result in the closure of schools, many of which are dependent on international students to stay afloat. In 2022, the Times Higher Education Supplement announced that UK Universities face a deficit of £4,000 for each home student taught – this deficit is made up by attracting international students and their higher fees. If the excellence attributed to UK architectural education is undermined, RIBA has heard from our international chapters, particularly in parts of Asia, that the appetite for UK architectural education will significantly reduce.

We welcome the proposal of opening up an entry point at the start of Part 2, which will improve accessibility to the profession for a small number of people. However, RIBA believe that the proposed model undermines and undervalues an undergraduate degree in architecture. There is huge value in a Part 1 qualification which is where students learn about design process and its critical connection to building performance. Part 1 students also develop key skills such as the ability to solve problems and think in three dimensions. In addition, the current model provides a level which is recognised by all Schools of Architecture and thus supports students who wish to undertake their Part 1 in one institution and their Part 2 in another.

RIBA agree with ARB that the current framework is inflexible for architects who have qualified in other countries. By removing the requirement for a regulated Part 1 qualification for international architects, ARB could improve the accessibility of the Register yet without undermining the excellence attributed to a 5-year UK architectural education.

The Register must be accessible by a number of routes. Any changes to the educational model cannot avoid or compromise this necessity. These should include, but not be restricted to, apprenticeships, combined work and study models and professional examination routes; and should open access to the development of programmes with integrated, academic credit bearing professional experience.

Finally, there has been no consultation with RIBA around ARB's proposal to remove of the jointly held title of Part 1, 2 and 3. The RIBA's world-renowned validation and membership processes could be undermined by presenting it in this way. This may also undermine the international perception of undergraduate degrees in UK Schools of Architecture.



WHAT CRITICAL CHANGES ARE NEEDED?

There are several areas of architectural education and training that we have already identified as requiring radical changes, such as the importance of life-long learning as highlighted through <u>The</u> <u>Way Ahead</u>. However, these issues have not been dealt with sufficiently in this consultation.

The length of time it takes to reach the Register

The consultation asks specifically about this in question 14 and we will expand our answer there. In short, while removing the minimum study length requirement may shorten the route to the Register for a small number, this ignores the fact that it is taking many students much longer than the current minimum time requirements to reach the Register. The proposals do not address this issue.

The unregulated period of practical experience

ARB have outlined their proposed standards for educational providers as part of the consultation, this includes a responsibility to ensure that "someone who has completed accredited qualifications has the practical experience required to join the Register". While they can be responsible for the standards of their institution, Schools of Architecture do not have the power to ensure that the practices within which students work adhere to those standards. Nor can they ensure that students get appropriate experience to meet the required outcomes. This directly impacts the length of time it takes students to reach the Register, and the proposed framework does little to address this issue. Architecture, unlike medicine, pharmacy and others, does not have a regulated pool of employers and we are keen to work with ARB to find an appropriate solution to this problem.

The restricted route to the Register

ARB are particularly interested in whether their proposal of a wider range of entry points will improve accessibility into the profession. RIBA agrees in part. There is opportunity in what ARB propose to open accessibility to the profession to those who have qualified in other countries and to those who wish to enter architectural education while holding other degrees.

However, RIBA are concerned that the proposals, as presented, do not recognise that students without a Part 1 degree and therefore without 5 years of architectural education, may not be able to access the portability afforded to those who undertake the 3+2 route. This is a particularly difficult issue to solve, and RIBA are keen to work with ARB, and the Schools of Architecture, to find a solution.

In addition, RIBA recognises that to widen access, the focus must be on the development of a variety of routes to the Register and how institutions can be supported in the development of such routes. These routes must offer students the opportunity to change route at different points along the journey, as personal circumstances can change. This is another reason why Part 1 is valuable – as it offers an opportunity to stop, 'dismount' and re-engage.



To bring about meaningful change, RIBA and ARB must work together to support and encourage innovative proposals which provide opportunities for additional support, time and funding.

The point at which a student can call themselves an architect

The UK's architectural education system produces graduates, who enter employment after five years of study, with the title 'architectural assistant'. When attending site meetings alongside graduate engineers or surveyors, who can practice under these titles upon graduation, this undermines our profession. We propose that consideration be given, in consultation with the profession, to providing architecture students with the opportunity to call themselves an architect on Part 2 graduation. This would better recognise the knowledge and skills of graduates in the context of their peers.

The funding of architectural education

Changes to the process of architectural education have the potential to cause significant disruption to the unique student funding models set up across the UK's devolved administrations, affording access to undergraduate funding for both full-time Part 1 and Part 2 qualifications. Written confirmation from ARB that the funding model will not be undermined by the decision to stop accrediting Part 1 courses will be critical, because at the moment, the two parts are seen as a single course for funding purposes, subject to certain eligibility criteria. Additionally, many graduates of other disciplines find their access to further loans restricted if they subsequently want to go on to study architecture, so it is not clear how they might fund their Master's study even if they were eligible to proceed straight to that level by the deregulation of Part 1.

The competencies required by students

The consultation asks about competencies specifically in question 15 and we will expand our answer there. However, the competencies lack detail to ensure students are climate literate. While technical aspects of architectural design seem to be integrated into areas of design; we are highly concerned that focus on performance, namely low operational energy and embodied carbon and a requirement for detailed design of technical responses, do not appear to be covered.

IS THE FRAMEWORK ADDRESSING THE VISION?

The vision put forward highlights what the ARB believe the benefits from these proposals will be for different groups. Our thoughts on each are below.

PUBLIC

Ensure that anyone joining the Register is equipped to design a built environment that reflects the needs of society so that people can be safe and live well, and helps to tackle the fundamental challenges our planet faces:

RIBA is concerned at the lack of reference to health & life safety and construction & resources within the list of competencies, and the lack of requirements to understand low operational energy and embodied carbon within the list of outcomes. Tackling the climate emergency must be integral to the outcomes that are required of students.



Royal Institute of British Architects

PROFESSION AND EMPLOYERS

Provide future architects with skills, knowledge, experience and behaviours:

RIBA have concern regarding the requirement for students to meet the 49 proposed outcomes across only two years of study. Integration of skills and knowledge into the design process is vitally important as is laid out in our Validation Procedures, since it is integral to the practice of architecture. In addition, we are concerned that the proposed areas of competence miss key areas of health & life safety and construction & resources which are critical with regards to the areas of climate literacy and technical understanding. These skills are vital for the profession.

The ARB proposals do not recognise the significant responsibility of the profession and employers to provide future architects. Whether presented as Part 3 or 'practice-based outcomes', the requirement on students to meet practice-based outcomes is reliant on employers ensuring that students have access to the experience to meet the outcomes. This reliance is currently based on the good will of employers and leaves students in a vulnerable position which they are unable to take control of. We are concerned that the vision presented by the ARB does not fully address the difficulties faced by students in practice.

INSTITUTIONS

Allow for flexibility and innovation by bodies that provide education and training, ensuring the UK remains an attractive place to study:

For those who wish to enter the discipline from another related profession, or for architects entering the UK from another country, the proposals outlined have the potential to speed up admission to the Register. However, for those students who wish to follow the typical route to Register, coupled with the removal of Parts 1, 2 and 3 and the international standard of five years architectural study is of concern. Globally, there is a consensus requiring five years study – without this standard it will be difficult to ensure the UK remains an attractive place to study.

It would be remiss to ignore the huge value that the UK architectural education system has worldwide. There is a significant risk that if the UK does not offer, nor require, a five-year architectural education, there will be a significant drop in the number of international students. Many students choose to come to study in the UK because of its reputation and the quality of its architectural education, but if our qualifications are not recognised in their home country, these benefits are lost. We have been informed of this concern by architectural and educational institutions and our chartered members around the world.

There is currently no mention of Part 3 in the ARB proposals. It is unclear if the ARB's aim is for most of the academic content of Part 3 to be subsumed into the Master's/Level 7 programme. If this is the case, this is a major change and will cause significant disruption for many programmes in the UK. Not all providers currently have Part 3 programmes and thus they will need to build this content from scratch, potentially with additional staff, course duration and cost implications. This academic



Royal Institute of British Architects

content, which is best processed and learnt through application, is not easily subsumed into an academic programme.

STUDENTS

Enable anyone with the right competencies to become an architect by a route that is right for them. Through an effective and proportionate quality assurance model, give clarity about the accountability of ARB, the institutions, and students:

RIBA agrees that the Register must be accessible by several different routes. Any changes to the educational model cannot avoid or compromise this necessity. These should include, but not be restricted to, apprenticeships, combined work and study models and professional examination routes; and should further allow the development of programmes with integrated, academic credit-bearing, professional experience. In addition, RIBA agrees that those with the necessary skills from practice or aligned disciplines and those who qualified in other countries should be able to reach and access the Register through a process which does not require them to undertake Part 1 if they are able to clearly demonstrate that they already have the skill, behaviours, experiences and knowledge at both Part 2 and Part 3. The de-prescription of Part 1 could address this without putting the UK education system at risk.

The five-year UK architectural system is highly respected around the world and this type of academic study offers students portability to many countries around the world. This must not be undermined.

RIBA recognises that student funding in England is changing through the Lifelong Learning Entitlement and implores ARB to actively petition for architecture to continue to be one of the exceptional subjects to receive five years. The funding situation is different in each of the four nations and ARB must ensure than their proposals do not undermine, put at risk, or damage the funding structure in any nation.

The situation regarding student funding and fees must be a primary point of concern and investigation for ARB as they work through their proposals. We are concerned about the impact that the new proposals could have on the funding of architectural education and student access to loans for the full length of study. This could have unintended consequences, by narrowing access to the profession and further promoting architecture as a subject for the wealthy.

ARB's vision for students does not mention the profession and employers which is an oversight. Employers must be recognised as having a responsibility to ensure that students have the appropriate opportunities to meet the required practice-based outcomes or Part 3. The ARB proposal does not recognise that students are dependent on practice to gain the appropriate experience in order to access the Register.



14. To what extent do you agree with ARB's proposal to no longer require a minimum duration of practical experience?

RIBA has presented a proposal in this response whereby students should have access to the Register on graduation, after which they would be required to work under licence, or certain restrictions, to complete the appropriate practical experience before fully accessing the Register. While we recognise that this would require an amendment to the Architects Act, it would place graduates on a par with their peers from other disciplines across the built environment.

RIBA believe that undertaking a period of practical training is fundamental as it puts into context the knowledge required in professional practice. The candidate uses that experience to inform and consolidate their knowledge. Not designating a minimum period of experience could risk students rushing their efforts to qualify before gaining the appropriate skills and knowledge; and could also lead to students choosing not to take a year in practice between their Bachelor's and Master's degree, causing potential pressure on the next period of study both academically and pastorally, where they do not have the necessary context and background.

RIBA's concerns for future architects lie with the recognition that, on average, it takes students much **longer** than the minimum to reach the Register, one of the main reasons for which lies with their attainment of the correct experience and support from practice to do so.

Practical experience must be reformed to ensure that students can gain the necessary experience to access the Register:

- **Practices must recognise their role in the training of future generations.** This means that any outcomes-based approach to practical experience must be coupled with the necessary support and time to achieve those outcomes. Any educational reform must address this aspect of an architecture student's training and RIBA would welcome the opportunity to further discuss with ARB how this might be achieved.
- Non-traditional practice-based routes must be encouraged and supported. Academia and practice, working together, must have the opportunity in the framework to innovate in the development of new routes to the Register.
- Early-career professionals must not be left in an unfocussed cycle of practical experience which does not provide them with appropriate experience. The practical training aspect of architectural education must have outcomes that can be achieved within the set timeframe.

ARB must recognise that institutions will be required to oversee the practical experience, and as such, any institutional qualification that tests the new practice outcomes will have a timeframe and thus the period of formal practical experience will have a duration. RIBA has no objections to an accelerated version of this qualification being presented, and thus can see that the removal of the timeframe will work in some cases.



15. To what extent do you agree that each competency area accurately reflects the skills, knowledge, experience and behaviours someone must demonstrate in order to practise as an architect?

Architects are the only regulated profession within the construction industry and play a key role in realising Government commitments addressing the climate crisis, improving building safety, and levelling up across the country. The future generation of architects need to be appropriately skilled, competent, and knowledgeable to address these complex issues. Students must be adaptable – ongoing learning is essential for architects to remain capable in a dynamic world.

Having urged the ARB to reconsider the competencies required of future architects for some years, we undertook research on this topic three years ago. With significant input from the profession, we produced the RIBA Themes and Values and Graduate Attributes as outlined in <u>The Way Ahead</u>. However, while resulting in a similar set of outcomes to the ARB, there is no reference to our research. This is confusing for academic providers who are potentially left with another set of outcomes to meet. Inconsistency between ARB prescription and RIBA validation criteria must be avoided – neither organisation wants to impose significant burden on education and training providers. The most straightforward process would be to use the RIBA Themes and Values and Graduate Attributes as an umbrella for both the qualitative and quantitative processes of RIBA and ARB. In addition, RIBA are concerned that the areas of health and life safety and structure, construction and resources – as outlined in the RIBA Themes and Values, have been missed from the ARB competency areas.

RIBA are concerned that description of competence in design, which now covers topics previously detailed under the heading of technology, does not recognise key areas of concern regarding building performance, building safety and the climate emergency. It is important that design is not just recognised as a response to a problem, but that a student must also be able to identify a problem. RIBA believes that the requirement for a student to embed their work within a context of sustainability responds strongly enough to the climate emergency. In addition, students need to not only 'understand' the consequence of decision-making but also play an active role in addressing the consequences of the problem. Outlined below are the RIBA Themes and Values and ARB's proposed competencies:

RIBA's Themes and Values:

- Health and Life Safety
- Ethical and Professional Practice
- Structure, Construction and Resources
- History, Theories and Methodologies
- Design Processes and Communication
- Business Skills

ARB's proposed competencies:

- Research & Evaluation
- Professionalism and Ethics
- Contextual and Architectural Knowledge
- Design
- Management, Practice and Leadership

RIBA 👾 Architecture.com

Royal Institute of British Architects

While there are similarities between four of the Themes and Values and ARB's proposed competencies, RIBA have a very strong view that *Structure, Construction and Resources* and *Health and Life Safety* are too important to subsume within other competencies and would urge ARB to add them to their list of specific competencies. In light of ARB's proposals for a specific competence in *Research and Evaluation,* RIBA will review its Themes and Values accordingly. It is vital for the profession that inconsistencies between the core competencies identified by ARB and RIBA to be addressed by architectural education be avoided.

16. Is there anything missing from our draft outcomes?

Yes – despite ARB's additional requirements placed on Schools of Architecture in the last two years focussing on a detailed and technical response to the climate emergency and health and life safety, the outcomes appear to make no reference to the low operational energy and embodied carbon or to any form of knowledge of building physics.

Low energy and zero carbon buildings require crucial expertise at the early stages of a project to ensure that the initial layout and building development optimises the environmental factors of the site. It is vital, therefore, that a greater degree of complexity is covered by the outcomes, particularly, acknowledging the extent of thought required to address zero carbon standards and recognising the long-term performance of the building and satisfaction of the client and the users of a building.

Understanding building performance, and critically addressing performance from the outset, is an important part of the design process, and it is important that a student can undertake this within the UK statutory and legal framework – RIBA would expect to see a requirement on students to know how to use UK Building Regulations.

In addition, students must recognise the importance of the ongoing education and professional development of an architect. Continued professional development (CPD) must be undertaken post-graduation to ensure that skills remain current.

While the outcomes presented do not include the detail required to deal with certain aspects of the climate emergency and building performance, in light of 49 separate outcomes, how students are able to integrate their skills and knowledge into the design process is still unclear. The design studio is the best place for this integration and application of knowledge. Overloading of outcomes may result in siloed teaching and a decrease in integration and application.

17. To what extent do you agree that each standard (for Institutions) will deliver ARB's aims? RIBA are not going to comment on each individual Standard for Institutions as the Standards strongly echo the current requirements of prescription and indeed RIBA's own validation process. Indeed, the Office for Students have similar requirements of all institutions.



RIBA would encourage ARB to ensure that their focus is on access to the Register, which is their legislative duty, as opposed to micro-managing the education process.

19. Do you have any suggestions about how we can improve the draft rules?

The Architects Act 1997 sets out that the ARB can prescribe how to join the Register. However, these proposals and new framework are moving towards an accreditation process. It is concerning that this has not be explicitly highlighted in the consultation document and the reasons for doing so have not be made clear. Clarity on this is urgently required.

There is a distinct lack of clarity around the draft accreditation rules in relation to standardisation and parity. With no set procedures for the process and specific requirements which must be met by all providers, there is a real risk of creating a hierarchy of providers.

Questions remain around how the ARB will measure the outcomes it has prescribed. Will the ARB recognise the process undertaken by institutions? Will they intend to use experts to ascertain that all students have met the minimum standard? Given there are 49 outcomes this could require a significant review process – assuming that all students must meet all outcomes. Do ARB intend to review all students and all pieces of work?

Schools of Architecture have been working to institutional learning outcomes for many years and so the use of outcomes will not be of concern. RIBA are concerned, however, that until now, both RIBA and ARB working with Schools of Architecture have sought synthesis – not just the integration and demonstration of knowledge, but how it draws all elements together to form a connected whole. This is why the design studio is such an important part of architectural education. This focus on outcomes, as presented by ARB, has the potential to pull education away from the process of synthesis to a tick-box exercise demonstrating that outcomes have been met.

RIBA also have concerns around the 'accreditation visit'. As it stands, there is a lack of clarity regarding what determines an accreditation visit and what that would entail. The Accreditation Rules document states that the Accreditation Visit Team will also produce a written report – but there is no information regarding whether this will act as an action plan, a conclusion or a set of advice points. It is strongly advised by RIBA that there should be parity across all accredited providers. The rules do not currently provide enough information on the specific requirements for schools, which should outline clearly what documentation is required, when a visit will be implemented and for what purpose. If accreditation is going to follow a 'risk-assessment' process, will this result in new providers receiving a disproportionate amount of scrutiny? RIBA strongly believe that providers should be treated equally, each expected to meet a clear set of requirements.

RIBA also are concerned by the rules presented for new programmes – "this process is initiated by the Applicant for accreditation by a written proposal to ARB <u>not less than two years before the</u> <u>students are admitted to the course</u> leading to the qualification for which accreditation will be



Royal Institute of British Architects

sought." We are aware of many new programmes already under development, and this proposal puts significant weight on new providers to have key assurances internally which often cannot be sought two years prior. We are concerned that the timeline required by ARB is excessive and will place unnecessary pressure on institutions.

20. Are there any risks or opportunities you would like to raise about our implementation date for the new framework?

Yes – the dates of implementation are concerning, particularly due to the lack of clarity around the risk-based review and the implications of this on institutions. RIBA request that ARB urgently provide more information on the transition period and the implications of this review.

21. Is there any additional guidance you would like ARB to provide?

It is important that clear guidance is provided to Schools of Architecture, and other providers of architectural education, regarding what is required of them during both the cyclical reaccreditation process and the annual monitoring process. This should be standardised ensuring that Schools are treated with equity.

22. To what extent do you agree that our proposals will help to widen access to the profession?

RIBA are concerned that ARB's proposals will not widen access to the profession, though it may open access to those who are already qualified in another country and wish to join the Register or purportedly for those who hold an aligned degree. However, the proposals will not create a more diverse and inclusive profession.

RIBA agrees that the Register must be accessible from a number of different routes. Any changes to the educational model cannot avoid or compromise this necessity. These should include, but not be restricted to apprenticeships, combined work and & study models and professional examination routes and should further access to the development of programmes with integrated, academic credit bearing professional experience. In addition, RIBA agrees that those with the necessary skills from practice or aligned disciplines and those who qualified in other countries should be able to reach and access the Register through a process which does not require them to undertake Part 1 if they are able to clearly demonstrate that they already have the skill, behaviours, experiences and knowledge at Part 2 and Part 3. The de-prescription of Part 1 could address this without putting the UK education system at risk.

23. To what extent do you agree that our proposals will help strengthen oversight of learning providers to create a better learning environment for students?

RIBA are concerned that ARB's proposals add another layer of oversight to learning providers which is not necessary to architectural education. What RIBA hear from Schools of Architecture often is for a desire to see ARB and RIBA working together in education. Education providers already have stringent additional requirements to meet, and those who offer apprenticeships are particularly impacted, with statutory oversight by various bodies including IFATE and OFSTED, already adding risk



Royal Institute of British Architects

and cost to running this route. RIBA want to work with ARB to ensure that processes are aligned as possible. There is a risk that too much duplication of oversight means providers may stop or cap some routes; and that time and resource that could go on students will be spent on administration.

24. Is there any feedback you wish to give about a positive or negative impact on equality, diversity and inclusion within our proposals?

RIBA recognise that in order to provide opportunities to widen access to architectural education, different routes to the Register must be encouraged and recognised.

RIBA understands, from Part 3 leaders, that the experience of students in practice can be significantly varied. RIBA recognise that there may be an inadvertent negative impact on equality, diversity and inclusion concerns if the experience of students in practice is not addressed. Importantly, it was shown at the RIBA's recent Interface gathering of practitioners and academics, that some of the issues faced by students in practice including low income, unpaid overtime and lack of access to required experience) are magnified for those from marginalised groups; and thus, this should be recognised, and extra provision put in place for those who are disadvantaged. Further these proposals do not consider 'equity' which is required to improve access into architecture education.

