

Higher Education Review (Alternative Providers) of BRIT College Ltd

February 2016

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About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at BRIT College Ltd. The review took place from 1 to 2 February 2016 and was conducted by a team of three reviewers, as follows:

- Dr Terence Clifford-Amos
- Mr Robert Evans
- Miss Mishal Saeed (student reviewer).

The main purpose of the review was to investigate the higher education provided by BRIT College Ltd and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the UK Quality Code for Higher Education (the Quality Code)¹ setting out what all UK higher education providers expect of themselves and of each other, and what the general public can expect of them.

In Higher Education Review (Alternative Providers), the QAA review team:

- makes judgements on
 - the setting and maintenance of academic standards
 - the quality of student learning opportunities
 - the information provided about higher education provision
 - the enhancement of student learning opportunities
- provides a commentary on the selected theme
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

A check is also made on the provider's financial sustainability, management and governance (FSMG) with the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure.

In reviewing BRIT College Ltd the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland. The themes for the academic year 2015-16 are Student Employability and Digital Literacy,² and the provider is required to select, in consultation with student representatives, one of these themes to be explored through the review process.

A summary of the findings can be found in the section starting on page 2. <u>Explanations of</u> the findings are given in numbered paragraphs in the section starting on page 4.

The QAA website gives more information <u>about QAA</u> and its mission.³ A dedicated section explains the method for <u>Higher Education Review (Alternative Providers)</u>.⁴ For an explanation of terms see the <u>glossary</u> at the end of this report.

www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2859.

¹ The UK Quality Code for Higher Education is published at: www.gaa.ac.uk/quality-code.

² Higher Education Review themes:

³ QAA website: www.qaa.ac.uk/about-us.

⁴ Higher Education Review (Alternative Providers): www.gaa.ac.uk/en/ReviewsAndReports/Pages/Educational-Oversight-.aspx.

Key findings

QAA's judgements about BRIT College Ltd

The QAA review team formed the following judgements about the higher education provision at BRIT College Ltd.

- The maintenance of the academic standards of awards offered on behalf of its awarding organisation meets UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities **meets** UK expectations.
- The enhancement of student learning opportunities meets UK expectations.

Good practice

The QAA review team identified the following features of good practice at BRIT College Ltd.

- The detailed programme specification and other high quality documentation, which are valued by students and extend beyond the formal obligations to the awarding organisation (Expectation A2.1).
- The embedding of employability awareness and skills within the curriculum (Expectation B3).
- The creation of an inclusive and supportive learning environment, which is fit for the purpose of meeting the expectations of a diverse intake (Expectation B4).

Recommendations

The QAA review team makes the following **recommendations** to BRIT College Ltd.

By June 2016:

- formalise internal programme approval procedures (Expectation B1)
- articulate and disseminate the College-level approach, including leadership responsibilities, to enhancing the quality of student learning opportunities (Enhancement).

By September 2016:

- produce and embed a clear and detailed retention strategy that enables the identification of at-risk students with a view to further improving the current retention rate (Expectation B2)
- systematise internal procedures to ensure that they are consistently recorded and contribute optimally to the enhancement agenda (Expectations B9, B4 and Enhancement).

Affirmation of action being taken

The QAA review team **affirms** the following action that BRIT College Ltd is already taking to make academic standards secure and/or improve the educational provision offered to its students.

 The active and purposeful steps to put in place a systematic approach to engaging with local employers as a means of increasing the employability of students (Expectation B4).

Theme: Student Employability

BRIT College Ltd gives considerable emphasis to employability, embedding it in teaching, and supporting it through tutorials and masterclasses. It also has an Employability Policy, which is currently in a developmental phase. Nevertheless, its engagement with employers is embryonic, and the strategic profile afforded to employability requires continuing and proactive internal and external engagement if it is to fulfil its potential.

Further explanation of the key findings can be found in the handbook available on the QAA webpage explaining <u>Higher Education Review (Alternative Providers)</u>.

Financial sustainability, management and governance

There were no material issues were identified at BRIT College Ltd during the financial sustainability, management and governance check.

Further explanation of the key findings can be found in the handbook available on the QAA webpage explaining <u>Higher Education Review (Alternative Providers)</u>.

About BRIT College Ltd

BRIT College Ltd (the College), an independent provider of higher education based in Limehouse, East London, was established in 2006 and has previously delivered higher education programmes on behalf of several awarding bodies and organisations. Following a number of difficulties and the loss of its Tier 4 status, it undertook a major policy review and now delivers only a Higher National Diploma in Business on behalf of Pearson Education.

The College's mission is to deliver innovative and customised learning opportunities to learners, staff and partners. It describes its main strategic priority as embedding enhancement in all its activities, thereby making the learning experience memorable and enriching for both learners and staff; and improving learner achievement and retention rates beyond national averages.

The College identifies the main challenge it has faced as improving the quality of its student population, which had previously caused difficulties both academically and culturally. It describes meeting this challenge as involving a steep learning curve, but one that has led to progressive improvements in the quality of later cohorts, to the point where the current student population is committed to learning and achievement. The documentation does not identify any as yet unmet challenges.

The College was subject to a QAA Review for Educational Oversight in May 2014. This had positive outcomes, with two features of good practice, and six recommendations relating to annual review, peer observation, staff development, learning resources, programme handbooks and online security. The 2015 annual monitoring visit found that, while progress had been made in some areas, annual review, peer observation and staff development remained undeveloped or unsystematised, and that documentation lacked detail as to the College's engagement with some parts of the Quality Code. These issues are addressed in the current report.

Explanation of the findings about BRIT College Ltd

This section explains the review findings in more detail.

Terms that may be unfamiliar to some readers have been included in a <u>brief glossary</u> at the end of this report. A fuller <u>glossary of terms</u> is available on the QAA website, and formal definitions of certain terms may be found in the operational description and handbook for the <u>review method</u>, also on the QAA website.

1 Judgement: The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations

Expectation (A1): In order to secure threshold academic standards, degree-awarding bodies:

- a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) are met by:
- positioning their qualifications at the appropriate level of the relevant framework for higher education qualifications
- ensuring that programme learning outcomes align with the relevant qualification descriptor in the relevant framework for higher education qualifications
- naming qualifications in accordance with the titling conventions specified in the frameworks for higher education qualifications
- awarding qualifications to mark the achievement of positively defined programme learning outcomes
- b) consider and take account of QAA's guidance on qualification characteristics
- c) where they award UK credit, assign credit values and design programmes that align with the specifications of the relevant national credit framework
- d) consider and take account of relevant Subject Benchmark Statements.

Quality Code, Chapter A1: UK and European Reference Points for Academic Standards

Findings

- 1.1 The College's sole higher education provision is a Higher National Diploma in Business offered on behalf of Pearson Education. While Pearson is responsible for securing the programme's threshold academic standard, the College is responsible for ensuring it is maintained. In order to do so it has developed internal structures, processes and due diligence that operate through both Pearson's programme specification and an in-house programme specification, which provides helpful information and is aligned with all external expectations.
- 1.2 The College is responsible for designing relevant programme materials, including both learning and teaching, and assessment strategies in respect of the latter it is required to contextualise Pearson's generic grade descriptors within each assessment set. Pearson's Academic Management Review for 2015-16 confirms that Academic Board meetings scrutinise and ratify policies, which are the responsibility of individuals, and, more generally, support the 'continuous development process within the College'.
- 1.3 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A2.1): In order to secure their academic standards, degree-awarding bodies establish transparent and comprehensive academic frameworks and regulations to govern how they award academic credit and qualifications.

Quality Code, Chapter A2: Degree-Awarding Bodies' Reference Points for Academic Standards

Findings

- 1.4 Responsibility for the transparency and comprehensiveness of academic frameworks and regulations rests with Pearson. Within the College, the Vice-Principal has overall responsibility for developing systems, processes and procedures, liaising with Pearson to ensure they meet its requirements, and for the management of academic standards and the quality of learning opportunities; the Academic Director chairs monthly Academic Management Meetings to monitor day-to-day operations; and the Academic Board, chaired by the Vice-Principal, oversees the management of academic standards.
- 1.5 The College states that it operates a clear, established organisational structure, which it publishes in its Academic Strategy and Governance Document and Staff Handbook, and that it undertakes systematic reviews of policies and procedures as part of annual monitoring. In respect of assessment, the College maps its provision against both the criteria set by Pearson and relevant external expectations, and its practice of internally verifying all scripts far exceeds Pearson's 10 per cent requirement. The review team, having considered the documentation and discussed the matter in meetings, confirms that the College follows the Pearson programme specification and that its delivery meets or exceeds all requirements to which it is subject.
- 1.6 The College measures the effectiveness of its own quality management processes, procedures and systems against the standards required by Pearson through its own programme specification, which, in its nine sections, broadens and further illustrates the academic context of the programme specification set by Pearson. The review team considers the detailed programme specification and other high quality documentation, which are valued by students and extend beyond the formal obligations to the awarding organisation, to be **good practice**.
- 1.7 The College describes its relationship with Pearson as one of partnership. In meetings with higher education staff and a Pearson representative, the review team heard examples of this partnership, which included designing support mechanisms for the delivery of teaching, implementing the Pearson suggestion that all teaching staff should become internal verifiers, and inviting Pearson representatives to take part in College staff development.
- 1.8 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A2.2): Degree-awarding bodies maintain a definitive record of each programme and qualification that they approve (and of subsequent changes to it) which constitutes the reference point for delivery and assessment of the programme, its monitoring and review, and for the provision of records of study to students and alumni.

Quality Code, Chapter A2: Degree-Awarding Bodies' Reference Points for Academic Standards

Findings

- 1.9 Responsibility for designing procedures and programmes rests with Pearson, with operational responsibilities delegated to the College. The review team examined the College's discharge of these responsibilities, which include maintaining a definitive programme record and making it available to stakeholders.
- 1.10 In addition to the generic information provided by Pearson, the College provides additional information in the Student Handbook, including intended learning outcomes, unit specifications, credits, assessment details, and information about monitoring and review. The review team found this information to be fully aligned with external expectations, accurate and fit for purpose.
- 1.11 The review team was aware of historic failings on the College's part: in particular, first-cohort students were for a while registered on the wrong programme pathway, and delays occurred in the provision of the correct programme specification and handbook. These difficulties, which the College acknowledged, had diminished significantly by the time of the most recent external verifier comments in July 2015. On the basis of an examination of all relevant documents, and discussions with senior managers and staff, the team found no shortcomings in respect of record-keeping, arrangements for which are now robust.
- 1.12 The College is responsible for ensuring that students have access to appropriate information about its programme. It follows that this information must be readily available and incorporated into its management information system. The scrutiny team noted certain weaknesses in this area. In particular, academic regulations are in handbooks but not on the virtual learning environment (VLE), and feedback to some students in response to their unit evaluations has been delayed. These matters were discussed with both staff and students, and the team confirms that the College is addressing them. Overall, students spoke positively about both the availability and accuracy of information, and the warmth and generosity of the support offered by staff.
- 1.13 The review team found that the College complies with Pearson's academic framework and regulations, and makes all relevant information available to students through the Student Handbook and at induction. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A3.1): Degree-awarding bodies establish and consistently implement processes for the approval of taught programmes and research degrees that ensure that academic standards are set at a level which meets the UK threshold standard for the qualification and are in accordance with their own academic frameworks and regulations.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

- 1.14 Formal responsibility for the approval of the Higher National Diploma programme, including ensuring engagement with all relevant external expectations, lies with Pearson. The College's responsibility is limited to programme delivery, selecting appropriate optional units and maintaining academic standards. This includes ensuring that procedures are in place to set assessments at an appropriate level, and ensuring that students are enabled to demonstrate achievement of the specified outcomes.
- 1.15 The Academic Board formally approves the College's programme specification (see Expectation A2.1). In the event that the College seeks to offer other optional units it makes formal application to Pearson for authorisation, and is required to provide proof that they meet local needs.
- 1.16 Pearson conducts an Academic Management Review to monitor the College's capacity to deliver the programme effectively, and therefore its ability to maintain academic standards. This covers the adequacy of financial and physical resources, academic governance structures and quality assurance mechanisms, particularly in relation to unit assessments. The review team scrutinised the College's performance through documentary study and meetings with senior staff and tutors, and found that participants understand and are able to articulate the division of responsibilities between Pearson and the College, and the processes by which the College discharges its responsibilities.
- 1.17 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A3.2): Degree-awarding bodies ensure that credit and qualifications are awarded only where:

- the achievement of relevant learning outcomes (module learning outcomes in the case of credit and programme outcomes in the case of qualifications) has been demonstrated through assessment
- both UK threshold standards and their own academic standards have been satisfied.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

- 1.18 Responsibility for overseeing the conduct of assessment rests with Pearson, which specifies unit learning outcomes and associated assessment criteria, ensuring through its standards verifiers that they meet all external requirements and expectations, and that the standard of work is appropriate to the grade awarded. Both the Pearson programme specification and the College programme specification (see Expectation A2.1) reference *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland.*
- 1.19 Pearson specifies how each assessment criterion in each unit should be processed; the College plays a defined operational role through setting assessments pursuant to Pearson guidelines, and writing and internally verifying assessment briefs. The College's Learning and Teaching Policy and Assessment Policy set out the assessment process as a whole. Unit teams set the relevant assessment for their unit; the Academic Director scrutinises assignment briefs; a senior academic member of staff not involved in the preparation of the brief acts as internal verifier; and the Vice-Principal (as Quality Nominee under arrangements with Pearson) gives final approval to the briefs prior to upload to the Pearson portal for assignment checking. Feedback from this checking service is considered and acted upon before the brief is sent to the external verifier for final approval prior to publication.
- 1.20 On the basis of documentary study, and meetings with senior staff and tutors, the review team found that, while the College relies considerably on the assignment checking process and external verifier, its internal processes are effective and understood by relevant members of staff. This is confirmed by Pearson's Academic Management Review for 2015-16. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A3.3): Degree-awarding bodies ensure that processes for the monitoring and review of programmes are implemented which explicitly address whether the UK threshold academic standards are achieved and whether the academic standards required by the individual degree-awarding organisation are being maintained.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

- 1.21 The College's discharge of its responsibilities for programme monitoring and review is overseen by Pearson's annual Academic Management Review (see Expectation A3.1). The College correctly understands its role as assisting in the discharge of this procedure, and to this end conducts its own programme annual monitoring review, the procedure for which is set out in its programme specification. The review team noted that this procedure involves consultation with students and found it robust and fit for purpose.
- 1.22 The review team examined documentary evidence, including both internal annual monitoring reports thus far undertaken. The College acknowledges that this process is at an early stage of development: the first report was limited in scope, but the second was significantly more useful.
- 1.23 As well as engaging in documentary study, the review team discussed College procedures with senior staff, tutors and students. Staff at all levels understand the importance of the process and their particular roles within it. The team found that the College makes effective use of its own internal monitoring processes to ensure that the programme meets UK threshold academic standards and Pearson requirements.
- 1.24 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (A3.4): In order to be transparent and publicly accountable, degree-awarding bodies use external and independent expertise at key stages of setting and maintaining academic standards to advise on whether:

- UK threshold academic standards are set, delivered and achieved
- the academic standards of the degree-awarding organisation are appropriately set and maintained.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

- 1.25 Pearson, as the awarding organisation, is responsible for designing and approving teaching units, including learning outcomes, assessment criteria, general grade descriptors, and the rules of combination. The College states that it has no plans to extend its higher education provision beyond its Higher National Diploma programme, but is, nonetheless, currently seeking a university partner.
- 1.26 The College is subject to mandatory external inputs from Pearson standards verifiers and the personnel involved in annual monitoring review; it is subject to inspection or review by the Department for Business, Innovation and Skills, and the Student Loans Company; and it has been subject to Educational Oversight by QAA since 2012. Its Academic Management Team, which has Pearson reports as a standing agenda item, assigns responsibility for implementing recommendations from standards verifiers and monitors progress; the College publishes issues arising in its newsletter.
- 1.27 The review team examined a range of documentary evidence and explored its use and application in meetings with College staff. The team found that the College's responses to Pearson's practices and requirements demonstrate appropriate engagement with external and independent expertise in maintaining academic standards.
- 1.28 The review team concludes that the Expectation is met and the associated level of risk is low.

The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations: Summary of findings

- 1.29 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published Handbook.
- 1.30 The College delivers a single programme at Higher National Diploma level on behalf of Pearson Education. It discharges its responsibilities appropriately, drawing on external advice and support, particularly from Pearson, but also from staff and students (though not, currently, from employers). The College takes steps to ensure that its activities are aligned with all relevant external reference points.
- 1.31 The College describes its relationship with Pearson Education as a partnership: while this is justifiable it is also the case that the College remains quite heavily reliant on aspects of Pearson's requirements and expectations. Nevertheless, there is evidence, in particular from its internal monitoring procedure and its conscientious approach to assessment, that this reliance is by no means excessive. The College's action in producing a comprehensive and clear programme specification, where it clearly transcends its obligations, is identified as good practice.
- 1.32 The review team concludes that the maintenance of the academic standards of awards offered on behalf of its awarding organisation **meets** UK expectations.

2 Judgement: The quality of student learning opportunities

Expectation (B1): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective processes for the design, development and approval of programmes.

Quality Code, Chapter B1: Programme Design, Development and Approval Findings

- 2.1 Overall responsibility for the design, development and approval of the programme delivered by the College remains with Pearson. The College is responsible for developing and delivering schemes of work and assessments based on Pearson requirements, including undertaking regular reviews to ensure continued academic currency and professional relevance. The College also exercises some choice as to which units to offer from those available; these are selected with regard to the needs of the local area.
- 2.2 The College's approach to this responsibility is centred on its quality management processes. The Vice-Principal, reporting directly to the Chief Executive and Board of Directors, is central to its exercise, having overall responsibility for the maintenance of academic standards: this includes overseeing curriculum planning, marking, and the internal verification and standardisation meetings carried out by the Academic Director. All relevant matters are discussed and agreed by the Academic Management Team and the Academic Board.
- 2.3 The review team, having considered the documentary evidence and engaged in discussion with managers and teaching staff, found that, although the College's procedures facilitate discussion and decisions on those academic matters concerning the design, development and approval within the College's responsibility, there is no discrete procedure for internal approval. The review team **recommends** that the College formalise internal programme approval procedures. This would provide a transparent forum, along with an audit trail, for decisions on academic matters concerning learning, teaching and assessment strategies and the choice of units within the programme.
- 2.4 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B2): Recruitment, selection and admission policies and procedures adhere to the principles of fair admission. They are transparent, reliable, valid, inclusive and underpinned by appropriate organisational structures and processes. They support higher education providers in the selection of students who are able to complete their programme.

Quality Code, Chapter B2: Recruitment, Selection and Admission to Higher Education

Findings

- 2.5 The College's Admissions Policy is aligned with the relevant Expectation of the Quality Code; its admissions process as a whole is robust, coherent, and conducive to promoting equality, diversity and fairness. In accordance with the College's aim of widening participation the process provides fair access to applicants from non-traditional routes, and options for students who do not meet admission criteria outright.
- 2.6 The College encountered problems related to the quality of its intakes in 2013 and 2014, resulting in poor attendance, high withdrawal rates, classroom misbehaviour and limited achievement. Measures were put in place to address these problems during the academic year 2013-14, and, following its loss of Tier 4 status, the College concentrated its business focus on local and EU students. The review team, which explored the efficacy of these arrangements by examining documentary evidence and meeting senior staff members and students, found that the College has successfully addressed these problems, and that the motivation of its current student population is not in question. Nevertheless, the College continues to lack a strategic approach to identifying, monitoring and supporting students at risk of withdrawal. The review team **recommends** that the College produce and embed a clear and detailed retention strategy that enables the identification of at-risk students with a view to further improving the current retention rate.
- 2.7 The review team found that the College's recruitment, selection and admission procedures are broadly effective but would be strengthened by a more focused and strategic approach to identifying and supporting at-risk students. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B3): Higher education providers, working with their staff, students and other stakeholders, articulate and systematically review and enhance the provision of learning opportunities and teaching practices, so that every student is enabled to develop as an independent learner, study their chosen subject(s) in depth and enhance their capacity for analytical, critical and creative thinking.

Quality Code, Chapter B3: Learning and Teaching

Findings

- 2.8 The College's Learning and Teaching Policy expresses a commitment to achieving effective learning through a range of specified approaches, stressing that such learning is dependent on the provision of knowledge, skills and understanding through inspirational teaching in a context that enables students to move towards becoming independent learners.
- 2.9 The College articulates its commitment to staff development and lifelong learning in a recently developed Staff Development Policy and an inaugural Teaching Development Day. Both of these innovations have been well received by teaching staff, who are required to develop and use methods of teaching and learning appropriate to a diverse, multicultural student body. The review team confirms that students receive good quality and relevant learning materials, complemented by fair and effective schemes of assessment and records of achievement.
- 2.10 In acknowledgement of the fact that many students already run their own businesses or aspire to do so in the future, the College has developed the concept of the classroom as a simulated workplace. This and associated employment-related initiatives have been well received and reflect a serious institutional engagement with the motivation of students. The review team considers the embedding of employability awareness and skills within the curriculum to be **good practice**.
- 2.11 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B4): Higher education providers have in place, monitor and evaluate arrangements and resources which enable students to develop their academic, personal and professional potential.

Quality Code, Chapter B4: Enabling Student Development and Achievement Findings

- 2.12 The College's values and mission include widening participation, and developing and delivering innovative and customised learning opportunities. The Teaching and Learning Strategy shapes future enhancement initiatives, which include continuous improvement in all academic activities; establishing the College as provider of the best learning experience to its learners; and making the College an enrichment centre for all members of staff and learners.
- 2.13 The Student Support and Learning Resources Policy makes reference to extenuating circumstances, reasonable adjustment and special consideration, disabilities, and the recognition of prior learning. Students who met the review team, while somewhat critical of aspects of physical space and furnishing quality, spoke well of the electronic support provided both personally and through an e-learning manual; they commented positively on the VLE, the improvements underway with wireless connectivity (currently under discussion with the London Borough of Tower Hamlets), e-books, the library, class handouts and one-to-one support.
- 2.14 The steps taken to meet student needs include: extending teaching hours into evenings and weekends; varying modes of delivery; reducing class sizes; placing greater emphasis on peer observation and review; making extensive use of tutorials for purposes that include formative feedback; providing optional information technology classes for mature returners to education; offering informal day-to-day formative feedback and tracking; and deploying creative forms of small group teaching, which encourage participation, role play and simulation. The review team noted the commitment and enthusiasm associated with these developments.
- 2.15 The review team, noting that the student submission to this report makes no mention of employability, also noted the absence of a bespoke College-based careers service. Nevertheless, the team found the Employability Policy to be robust and engaging, embracing as it does employer partnerships, monitoring and review, pedagogy and benchmarking. Further to this, the team explored, with managers, staff and students, the breadth and depth of the College's commitment to employability, including its prospective engagement with local and national employers, future deployment of internships, work experience and other forms of work-based practice. On the basis of these discussions it confirms the existence of high aspiration and judicious thinking, but also that the College has some way to go before it has met the aims of the Policy. The review team **affirms** the active and purposeful steps to put in place a systematic approach to engaging with local employers as a means of increasing the employability of students.
- 2.16 Since personal support for students has not been well rated historically, these comments lead the review team to conclude that recent developments have been successful, and that the College's responsiveness to students is genuine, appropriately delivered and well understood. In this regard, the team noted in particular the comment of a senior staff member that, from September 2015, the College was 'literally a new organisation'. The review team considers the creation of an inclusive and supportive learning environment, which is fit for the purpose of meeting the expectations of a diverse intake, to be **good practice**.

- 2.17 Nevertheless, the review team also notes that many student comments are delivered informally through the opportunities provided by the College's open door policy, and that the College has yet to systematise its approach to collecting, analysing and utilising these comments for the purpose of future enhancement. A recommendation is made in relation to this later in this report (see Enhancement).
- 2.18 The review team found that the College takes a broadly strategic approach to the provision and continued improvement of resources to enable the development and achievement of its students, although in some elements its efforts remain at an early stage and require forward planning. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B5): Higher education providers take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience.

Quality Code, Chapter B5: Student Engagement

Findings

- 2.19 The College's approach to student engagement is explained in the Student Handbook as including students in decision making and promoting the student voice. Students have a seat on every formal decision-making body in the College, including the Academic Management Team meetings. In addition, the College prides itself on its very informal atmosphere and having approachable staff members to resolve any complaints or issues that students may face. Students spoke very positively about this informal support system, saying that having an open door policy with the Vice-Principal and other senior staff was helpful.
- 2.20 Mechanisms for securing formal feedback include questionnaires (following induction, after each unit, and at end of year); the representative system; and an end-of-year Student Consultation, in which students provide feedback on programme design, assessment and learning resources. Information is shared with students through the minutes of the Academic Management Team and a College newsletter. The Student Engagement Policy is reviewed annually, but the College could benefit from more frequent review.
- 2.21 The review team encountered a number of issues students had raised, which the College was working on resolving. Although an overarching engagement and consultation strategy that acknowledges students as partners at institutional level is missing largely as a result of the College being a small and relatively new institution, and from the absence of a students' union the team found the College responsive to students' concerns and willing to facilitate the formation of a student council should students wish to develop one. Students met by the team spoke positively about the College's approach to resolving issues and providing a familial and supportive atmosphere. Student representatives appeared to have been well-trained and supported in their roles.
- 2.22 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B6): Higher education providers operate equitable, valid and reliable processes of assessment, including for the recognition of prior learning, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought.

Quality Code, Chapter B6: Assessment of Students and the Recognition of Prior Learning

Findings

- 2.23 Pearson is responsible for setting the learning outcomes and assessment criteria for the programme delivered by the College. The College is responsible for assessment setting (in compliance with Pearson requirements), first marking, internal verification and providing feedback. The number and frequency of assessments are specified in the programme specification.
- 2.24 The College's Assessment, Progression and Awards Policy formerly provided guidance to ensure that the standard is maintained at the appropriate level: since December 2015 this has been superseded by the Assessment Policy, the Progression Policy and the Awards Policy. Training in assessment criteria and learning outcomes is provided for staff, and appropriate guidance is provided for students.
- 2.25 Arrangements for assessment setting are as described in Expectation A2.1. The range of methods deployed includes presentations (individual and group), role play, personal reflection, diaries, essays and reports. Appropriate adjustments are made in assessment criteria to meet any additional learner needs.
- 2.26 The College states that assessments are scheduled to allow time for students to receive both formative tutorial feedback on partially completed work and additional support as requested in the two weeks prior to submission. Marking and moderation are aligned with Pearson's policies, and include standardisation meetings, during which a consistent approach to marking is agreed. The Academic Board then acts as an assessment board, considering the end-of-year marks.
- 2.27 The review team considered the documentary evidence and found that in two cases Pearson's standards verifier reported concerns with the assessment; these were later actioned by the College to the satisfaction of Pearson.
- 2.28 On the basis of documentary study and meetings with senior staff and tutors, the review team found that, while reliance is placed on the Pearson assignment checking process and the standards verifier, the College operates equitable, valid and reliable processes of assessment, enabling students to demonstrate the extent to which they meet the learning outcomes. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B7): Higher education providers make scrupulous use of external examiners.

Quality Code, Chapter B7: External Examining

Findings

- 2.29 The College receives monitoring visits from a Pearson-appointed standards verifier; these are arranged between Pearson and the College's Vice-Principal, as Quality Nominee and programme leader. Following each visit the verifier produces a report for the College to consider, deliberate and effect future action planning where necessary (see Expectation A3.4). The review team scrutinised all documents relating to internal processes, the external requirements of Pearson, standards verifiers' reports, exemplary responses to the reports, and one reflection on reports and related matters.
- 2.30 The review team found that the College works in partnership with external standards verifiers, responds appropriately to their requests and suggestions, and liaises with them throughout each academic year. College managers ensure compliance with Pearson's assessment requirements and relevant external reference points, and the team confirms that standards verifier reports, the responses to them and reflection, illustrate constant critical engagement with a range of assessment practices, and discursive interchange as to possible future developments.
- 2.31 Pearson, which has provided in-house training for College staff, offers the College some discretion in respect of teaching, assessment and resources; the College makes appropriate use of this, for example by integrating employability into the syllabus where possible. The review team is aware that in 2014 the level of marking of the first set of submitted assignments was found to be over-generous. Nevertheless, this issue was resolved and is no longer applicable; the standards verifier reports read by the review team reveal no significant problems and confidently express overall satisfaction.
- 2.32 On the basis of documentary scrutiny, and meetings with senior and teaching staff and students, the review team found that the College makes full and scrupulous use of standards verifiers. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B8): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective, regular and systematic processes for monitoring and for review of programmes.

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

- 2.33 As noted under Expectation A3.3 the College conducts its own programme annual monitoring review, which it describes as 'at an early stage in its development'. The process commenced in the academic year 2013-14 and two reports have thus far been produced.
- 2.34 The methodology covers all institutional procedures from recruitment to completion, and involves contributions from managers, teaching staff and students; it is subject to faculty review and Academic Board approval. Student participation is by way of feedback through formal channels, including committee membership and the open door policy (see Expectation B9). Matters covered include the scheduling and structure of lessons, the method of selection of programme units and the resources available to support their learning. In addition, both the Vice-Principal and the Academic Director undertake teaching duties, as well as teaching observations, to obtain first-hand insight into the operation of the process.
- 2.35 The review team noted that of the two reports thus far produced, the first for the academic year 2013-14 lacks data-based analysis and gives greater emphasis to issues raised by external bodies (in particular Pearson and QAA) than to issues generated through the application of institutional policies and procedures. The later report for the academic year 2014-15 benefits from a revised institutional template with action plan, and contains a greater level of analysis of qualitative and quantitative data. The review team found that this later report is more in line with practice elsewhere in its coverage and level of reflection, although it did not make explicit reference to the use of quality assurance procedures to identify opportunities for enhancement. The Expectation was also tested in meetings with senior and teaching staff, and students. In each case, staff at all levels appreciated the importance of the process and demonstrated understanding of their roles within it.
- 2.36 On the basis of consideration of the documentary evidence, and meetings with senior and teaching staff and students, the review team found that the College operates effective, regular and systematic processes for the monitoring and review of its programmes. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B9): Higher education providers have procedures for handling academic appeals and student complaints about the quality of learning opportunities; these procedures are fair, accessible and timely, and enable enhancement.

Quality Code, Chapter B9: Academic Appeals and Student Complaints Findings

- 2.37 The College introduced a Student Complaints and Academic Appeals Policy, with separate sections on the two categories, in September 2015. Appropriate reference to this Policy appears in the Student Handbook. In the same month the College began subscribing to the Office of the Independent Adjudicator (OIA), adopting the OIA's good practice framework as its key reference point. Since the present review visit took place only five months after the adoption of the Policy it would be premature to assess its operational effectiveness, but the process itself is thorough, in place and accessible to students.
- 2.38 The review team found in meetings that staff were unclear as to the protocol should students want to make a formal complaint or appeal, beyond directing them to the Student Handbook, where not all the information is clear. In particular, no reference was made to the possible role that could be played by the recently-appointed Welfare Officer. Staff were equally unclear about where complainants could find impartial support and advice, including the OIA's website. This omission arose for several reasons: the procedures are recent; no student has yet made a formal complaint; no independent student representative body is in existence; and hourly-paid staff (who constitute the large majority of teachers) have not been fully inducted. This is a matter to which the College may wish to give consideration, since currently it is not clear that all students are aware of the impartial advice mechanisms expected by the Quality Code.
- 2.39 The College has an open door policy that works effectively to resolve everyday issues. Nevertheless, on the basis of its scrutiny of the student submission to this report, and its meeting with students, the review team found issues and informal complaints that the College had not swiftly resolved, or was still in the process of resolving. While procedures are in place and students did not express dissatisfaction with the College's response, the College does not monitor and evaluate the effectiveness of these procedures or reflect on their outcomes for enhancement purposes. The review team **recommends** that the College systematise internal procedures to ensure that they are consistently recorded and contribute optimally to the enhancement agenda.
- 2.40 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation (B10): Degree-awarding bodies take ultimate responsibility for academic standards and the quality of learning opportunities, irrespective of where these are delivered or who provides them. Arrangements for delivering learning opportunities with organisations other than the degree-awarding organisation are implemented securely and managed effectively.

Quality Code, Chapter B10: Managing Higher Education Provision with Others Findings

2.41 The College has no partnership arrangements, including internships, therefore this Expectation does not apply.

Expectation (B11): Research degrees are awarded in a research environment that provides secure academic standards for doing research and learning about research approaches, methods, procedures and protocols. This environment offers students quality of opportunities and the support they need to achieve successful academic, personal and professional outcomes from their research degrees.

Quality Code, Chapter B11: Research Degrees

Findings

2.42 The College does not offer research degrees, therefore this Expectation does not apply.

The quality of student learning opportunities: Summary of findings

- 2.43 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published Handbook.
- 2.44 The College operates its quality management system under the supervision of Pearson Education; its own annual monitoring process is newly developed but appears fit for purpose. The College has certain devolved admissions responsibilities where, following its adjustment to a different clientele following the ending of Tier 4 status, it implemented a rigorous approach to student selection, supported by a distinctive and appropriate evaluation system, which has thus far contributed significantly to improving the quality of its intake.
- 2.45 The College regards the quality of student learning at the heart of its operations. The review team found evidence to support this claim, including the College's investment in more costly forms of teaching to facilitate such learning and to align provision with the declared needs and wishes of its primarily mature, local student population. However, both the College's engagement with employers and its dissemination of its Student Complaints and Academic Appeals Policy require attention.
- 2.46 Students submitting work for assessment receive extensive support both formatively (in tutorials) and in a summative manner. Overall, and with the exception of some physical resources, students speak well of the learning resources available and the support they receive, and they value the informal, collaborative and engaged ethos of all staff from the Principal down. The review team found that a greater degree of formalisation would contribute significantly to the development of the College's quality management and enhancement system.
- 2.47 The review team concludes that the quality of student learning opportunities at the College **meets** UK expectations.

3 Judgement: The quality of the information about learning opportunities

Expectation (C): UK higher education providers produce information for their intended audiences about the higher education they offer that is fit for purpose, accessible and trustworthy.

Quality Code, Part C: Information about Higher Education Provision

Findings

- 3.1 The College's information checking and publication process is expressed in its Marketing and Communications Policy, the current version of which came into effect in September 2015. In all cases, sign-off responsibility rests with the Director of Communications, in consultation with the Chief Executive where appropriate.
- 3.2 In respect of learning materials and other information for students, the Academic Director is responsible for quality, content and copyright issues, and the Information Technology Manager for uploading materials to the VLE, ensuring both consistency of format and that they are correctly located. The review team scrutinised various documentary evidence submitted and found the information accessible and fit for purpose.
- 3.3 The College uses a range of mechanisms to keep students informed about significant matters: these include the Student Handbook; the Short Message System for pastoral and academic alerts; emails; notice boards; and the VLE. In discussion with staff and students the review team learned that students were satisfied with the accuracy of the information provided prior to enrolment, confirming the statement in the student submission to this report that 86 per cent of students found it useful. The team did note, however, that an open day leaflet contained potentially misleading information 'student finance available for eligible students so you don't need to worry about money when studying'. The College might consider it prudent to review this.
- 3.4 On the basis of documentary study and meetings with senior and teaching staff and students, the review team found that the College has mechanisms in place to ensure the accuracy, transparency and ownership of information. The review team concludes that the Expectation is met and the associated level of risk is low.

The quality of the information about learning opportunities: Summary of findings

- 3.5 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published Handbook.
- 3.6 The information provided by the College is fit for purpose, accessible and trustworthy, and considered to be so by its main users, the students. The College has mechanisms in place to ensure the accuracy, transparency and ownership of information.
- 3.7 The review team concludes that the quality of the information about learning opportunities at the College **meets** UK expectations.

4 Judgement: The enhancement of student learning opportunities

Expectation (Enhancement): Deliberate steps are being taken at provider level to improve the quality of students' learning opportunities.

Findings

- 4.1 The College's approach to quality enhancement is articulated in its Academic Strategy and Governance Document. The College states that it approaches enhancement with three goals in mind: to integrate quality and continuous improvement in all academic activities; to establish the College as a provider of the best learning experience to its learners; and for the College to become an enrichment centre for both staff and students.
- 4.2 The review team met groups of senior managers, teaching staff and students, all of whom described enhancement as a priority. Examples of recent enhancement activity were said to include reducing class sizes to enhance students' learning opportunities; reorganising the delivery of the curriculum, with fewer units delivered at any one time; improving the response rate to student surveys by conducting them in the classroom; appointing unit leaders within teaching groups to discuss delivery issues and share good practice; embedding employability skills and awareness in the curriculum; and establishing the new post of Director of Business and Compliance to oversee the development and maintenance of processes and policies. The role of students involves the standard feedback mechanisms, the open door policy (see Expectation B9) and the representation system.
- 4.3 The review team scrutinised the Academic Strategy and Governance Document and its associated action plan, an aspirational document lacking responsible names or timelines for completion; documentation provided for the current review, where reference to enhancement is very limited; and the annual monitoring report for 2014-15, which relies on quotation from the Academic Strategy and Governance Document. While the team confirms that the College seeks to promote an ethos that expects and encourages the enhancement of student learning opportunities at all levels, it is recommended that the College systematises internal procedures to ensure that they are consistently recorded and contribute optimally to the enhancement agenda (see Expectation B9).
- 4.4 While the review team found many examples of enhancement activity 'on the ground', the College's response to the requirement for a provider-level approach is not wholly systematic or clearly articulated; its quality assurance procedures are not consistently and explicitly used to identify enhancement opportunities, although the process leading to the production of annual monitoring reports does generate initiatives from the analysis of data. The review team **recommends** that the College articulate and disseminate the College-level approach, including leadership responsibilities, to enhancing the quality of student learning opportunities.
- 4.5 While the College's efforts to embed enhancement in routine operations are not yet fully in place, the College is aware of the importance of enhancement and has taken deliberate steps to improve the quality of learning opportunities. The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

The enhancement of student learning opportunities: Summary of findings

- 4.6 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published Handbook.
- 4.7 The College's approach to enhancing students' learning opportunities includes increasing flexibility in modes of study; achieving improvements in recruitment; investing in more costly forms of teaching and learning; and more generally addressing the particular needs and motivations of its current student population. While efforts to embed enhancement in routine operations are not yet fully in place, the College has taken deliberate steps to improve the quality of learning opportunities.
- 4.8 The review team concludes that the enhancement of student learning opportunities at the College **meets** UK expectations.

5 Commentary on the Theme: Student Employability

Findings

- 5.1 In demonstrating its strategic commitment to the world of employment, the College has developed a detailed and persuasive Employability Policy, operative from September 2015, and has reviewed the units offered to ensure that learners are prepared for work or to establish their own businesses. The driver for employability commences during induction, when learners are allocated to motivational sessions by members of senior management. Employability is also introduced during induction, through a termly masterclass covering work and business opportunities, and in learning activities designed to help students improve their work-seeking skills. The College is therefore taking deliberate steps to embed employability awareness and skills within the curriculum.
- 5.2 Students receive a termly business masterclass, outlining work and business opportunities, and are involved in learning activities that promote their initiatives and skills to increase their attractiveness to potential employers. The embedded business masterclasses during the seven-week teaching period are sourced from people in industry, university lecturers, local council employees, job centre staff and business people, as outlined in the programme specification.
- 5.3 The College attracts learners whose backgrounds are varied but whose motivation coalesces around employability or self-employment, as well as a minority whose goal is a degree-level vocational qualification. With this in mind the College has conducted an investigation into market trends to assist students into work, to strengthen promotion prospects, to seek better employment, or to become business owners. Staff have also had preliminary discussions with a leading local employer to discuss internship possibilities, although the College recognises the challenges associated with this.
- 5.4 Although there is a palpable thrust in employment interest, and a rhetorical priority in the Employability Policy, which is currently in a developmental phase, the review team believes that this strategic profile needs strongly proactive internal and external engagement towards meeting the potential of this excellent focus.

Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 30-33 of the <u>Higher Education Review (Alternative Providers) handbook</u>.

If you require formal definitions of other terms please refer to the section on assuring standards and quality: www.gaa.ac.uk/assuring-standards-and-quality.

User-friendly explanations of a wide range of terms can be found in the longer **Glossary** on the QAA website: www.qaa.ac.uk/Pages/GlossaryEN.aspx.

Academic standards

The standards set by **degree-awarding bodies** for their courses (programmes and modules) and expected for their awards. See also **threshold academic standard**.

Award

A qualification, or academic credit, conferred in formal recognition that a student has achieved the intended **learning outcomes** and passed the assessments required to meet the academic standards set for a **programme** or unit of study.

Blended learning

Learning delivered by a number of different methods, usually including face-to-face and e-learning (see **technology enhanced or enabled learning**).

Credit(s)

A means of quantifying and recognising learning, used by most institutions that provide higher education **programmes of study**, expressed as numbers of credits at a specific level.

Degree-awarding organisation

A UK higher education provider (typically a university) with the power to award degrees, conferred by Royal Charter, or under Section 76 of the Further and Higher Education Act 1992, or under Section 48 of the Further and Higher Education (Scotland) Act 1992, or by Papal Bull, or, since 1999, granted by the Privy Council on advice from QAA (in response to applications for taught degree awarding powers, research degree awarding powers or university title).

Distance learning

A course of study that does not involve face-to-face contact between students and tutors but instead uses technology such as the internet, intranets, broadcast media, CD-ROM and video, or traditional methods of correspondence - learning 'at a distance'. See also **blended learning**.

Dual award or double award

The granting of separate awards (and certificates) for the same **programme** by two **degree-awarding bodies** who have jointly delivered the programme of study leading to them. See also **multiple award**.

e-learning

See technology enhanced or enabled learning

Enhancement

The process by which higher education providers systematically improve the quality of provision and the ways in which students' learning is supported. It is used as a technical term in our review processes.

Expectations

Statements in the **Quality Code** that set out what all UK higher education providers expect of themselves and each other, and what the general public can therefore expect of them.

Flexible and distributed learning

A programme or module that does not require the student to attend classes or events at particular times and locations.

See also distance learning.

Framework

A published formal structure. See also framework for higher education qualifications.

Framework for higher education qualifications

A published formal structure that identifies a hierarchy of national qualification levels and describes the general achievement expected of holders of the main qualification types at each level, thus assisting higher education providers in maintaining academic standards. QAA publishes the following frameworks: *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) and *The Framework for Qualifications of Higher Education Institutions in Scotland* (FQHEIS).

Good practice

A process or way of working that, in the view of a QAA review team, makes a particularly positive contribution to a higher education provider's management of academic standards and the quality of its educational provision. It is used as a technical term in QAA's audit and review processes.

Learning opportunities

The provision made for students' learning, including planned study, teaching, assessment, academic and personal support, and resources (such as libraries and information systems, laboratories or studios).

Learning outcomes

What a learner is expected to know, understand and/or be able to demonstrate after completing a process of learning.

Multiple awards

An arrangement where three or more **degree-awarding bodies** together provide a single jointly delivered **programme** (or programmes) leading to a separate **award** (and separate certification) of each awarding organisation. The arrangement is the same as for **dual/double awards**, but with three or more awarding bodies being involved.

Operational definition

A formal definition of a term, establishing exactly what QAA means when using it in reviews and reports.

Programme (of study)

An approved course of study that provides a coherent learning experience and normally leads to a qualification.

Programme specifications

Published statements about the intended **learning outcomes** of programmes of study, containing information about teaching and learning methods, support and assessment methods, and how individual units relate to levels of achievement.

Public information

Information that is freely available to the public (sometimes referred to as being 'in the public domain').

Quality Code

Short term for the UK Quality Code for Higher Education, which is the UK-wide set of **reference points** for higher education providers (agreed through consultation with the higher education community, and published by QAA), which states the **Expectations** that all providers are required to meet.

Reference points

Statements and other publications that establish criteria against which performance can be measured.

Subject Benchmark Statement

A published statement that sets out what knowledge, understanding, abilities and skills are expected of those graduating in each of the main subject areas (mostly applying to bachelor's degrees), and explains what gives that particular discipline its coherence and identity.

Technology enhanced or enabled learning (or e-learning)

Learning that is delivered or supported through the use of technology.

Threshold academic standard

The minimum acceptable level of achievement that a student has to demonstrate to be eligible for an academic **award**. Threshold academic standards are set out in the national **frameworks** and **Subject Benchmark Statements**.

Virtual learning environment (VLE)

An intranet or password-only interactive website (also referred to as a platform or user interface) giving access to **learning opportunities** electronically. These might include such resources as course handbooks, information and reading lists; blogs, message boards and forums; recorded lectures; and/or facilities for online seminars (webinars).

Widening participation

Increasing the involvement in higher education of people from a wider range of backgrounds.

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