

Quality Review Visit of City of Westminster College

May 2017

Key findings

QAA's rounded judgements about City of Westminster College

The QAA review team formed the following rounded judgements about the higher education provision at City of Westminster College.

- **There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.**
- **There is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.**

Areas for development

The review team identified the following **areas for development** that have the potential to enhance quality and/or further secure the reliability and/or comparability of academic standards at City of Westminster College. The review team advises City of Westminster College to:

- further develop processes and procedures for the Board of Governors to ensure its full involvement within the strategic direction of higher education (Code of Governance)
- produce a single definitive document for each Pearson award that contains generic and specific intended learning outcomes to make achievement expectations clear (Quality Code)
- further develop admission processes to include an admissions policy that ensures that policies and procedures are transparent (Consumer Protection)
- further develop the process for monitoring information to ensure accuracy and completeness across all information sources (Consumer Protection).

Specified improvements

The review team identified the following **specified improvements** that relate to matters that are already putting, or have the potential to put, quality and/or standards at risk at City of Westminster College. The review team recommends that City of Westminster College:

- make available key material information for students that includes Unistats Key Information Sets (Consumer Protection)
- clarify and communicate the responsibilities of each partner within the tripartite agreement and incorporate these in the terms and conditions that apply to students (Consumer Protection).

About this review

The review visit took place from 16 to 17 May 2017 and was conducted by a team of three reviewers, as follows:

- Dr Abigail Hind
- Ms Dorothy McElwee
- Mr Stuart Cannell (student reviewer).

The overall aim of Quality Review Visit is to:

- provide the relevant funding body with an expert judgement about the readiness of a provider to enter, or continue to operate within, the higher education sector.

Quality Review Visit is designed to:

- ensure that the student interest is protected
- provide expert advice to ensure that the reputation of the UK higher education system is protected, including the protection of degree standards
- identify development areas that will help a provider to progress through a developmental period and be considered 'established'.

Each review visit considers a provider's arrangements against relevant aspects of the baseline regulatory requirements, and in particular:

- the reliability of degree standards and their reasonable comparability with standards set and achieved by other providers
- the quality of the student academic experience, including student outcomes where the provider has a track record of delivery of higher education.

About City of Westminster College

City of Westminster College (the College) is a medium-sized further and higher education college based in the Borough of Westminster in central London. The College is the main provider of post-16 education and training in the area.

The College has four sites; higher education is delivered at the Paddington Green campus. Franchised provision delivered by Community Music Limited (Community Music), a community based charity, is based at the Brady Arts Centre in East London. The College has 306 higher education students, of which 162 are part-time, and they are enrolled on level 4 and 5 Higher National programmes and a foundation degree.

The College's higher education provision is delivered on behalf of one awarding organisation, Pearson, with provision across a range of subject areas including business, building services engineering, construction and music production. In addition, the College has a tripartite agreement with the University of Westminster and Community Music to deliver a validated Foundation Degree in Creative Music Production and Business.

Judgement area: Reliability and comparability of academic standards

The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ)

- 1 The College does not have degree awarding powers for its higher education provision. The majority of the provision is through the awarding organisation, Pearson, offering Higher Nationals and through a tripartite agreement between the College, Community Music (a community based charity), and the University of Westminster, for the delivery of the Foundation Degree in Creative Music and Business.
- 2 Pearson and the awarding body are responsible for setting academic standards to ensure that they meet UK threshold standards by aligning their qualifications to FHEQ level descriptors. The College is accountable for the delivery and assessment of Pearson provision, and Community Music delivers the University of Westminster's Foundation Degree on behalf of the College.
- 3 The College confirms that it is fully compliant with Pearson and awarding body requirements, with a comprehensive range of policies and procedures and a management information system to ensure academic standards are met.
- 4 The College formally reports on an annual basis to Pearson and the awarding body regarding the discharge of its responsibilities. The Quality Standards and Student Affairs Committee (QSSA), a subcommittee of the Governing Body, receives these annual reports and action plans to maintain effective oversight of academic standards at governance level.
- 5 The review team found that a number of other higher education committees monitor and report on academic standards. These make a significant contribution to the maintenance of academic standards and include assessment boards, the Cross-College Verification Group (CCVG), course committees and the Higher Education Board. For example, the CCVG meets weekly to monitor compliance with Pearson and awarding body requirements.
- 6 The College engages effectively with external examiners, who report on higher education provision and confirm that the College is meeting comparable academic standards.
- 7 The review team found that the College has in place appropriate arrangements for ensuring that the academic standards of its programmes are at a level that meets threshold standards and that the academic standards of programmes are comparable with those of other UK higher education providers.

The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

- 8 The College has a Board of Governors that has established several subcommittees, including but not limited to: Staffing, Finance and General Purpose (SFGP); Audit; and QSSA. Quality Monitoring Meetings (QMMs) are held on a termly basis, following the termly assessment board, to discuss overarching issues in relation to students at risk. Governors are invited to attend QMMs, student focus groups, assessment boards, teaching observations and internal verification events.
- 9 The Clerk of the Board of Governors undertakes an annual compliance check in line with the AoC guidelines. The Board of Governors receive annual updates in relation to

higher education through the College's Self-Evaluation Document and an annual report delivered by the Associate Director of Higher Education and International Development. The Quality and Standards Manager is also a Governor with particular interest in higher education and welfare issues.

10 The review team found that the QSSA subcommittee is where the majority of higher education operational matters are brought for discussion and resolution. Although Governors are invited to attend a variety of events, their attendance is infrequent.

11 The review team found that although the College has in place appropriate committees in which higher education matters are discussed, there is a lack of strategic direction being set for the College by the Board of Governors in relation to higher education. The review team advises that the College further develop processes and procedures for the Board of Governors to ensure its full involvement within the strategic direction of higher education, identifying this as an **area of development**.

The Expectations of the UK Quality Code for Higher Education (the Quality Code)

12 The College's arrangements for discharging its responsibilities for helping to set and maintain the academic standards of awards set by the awarding body and Pearson are broadly effective.

13 The College's programme specifications set out the generic intended learning outcomes in line with the FHEQ, but course-specific intended learning outcomes are not easily accessible in either course handbooks or through the virtual learning environment for most courses. Accordingly, there is no single definitive record to determine the overall expectations and thus academic standards required for the completion of each award as a reference point for the delivery and assessment of programmes.

14 The review team advises that the College produce a single definitive document for each Pearson award that contains generic and specific intended learning outcomes to make achievement expectations clear, identifying this as an **area for development**.

15 Assessments intended to test student achievement, in line with published unit learning outcomes, are designed in accordance with Pearson and awarding body expectations and appear effective in providing students with the opportunity to demonstrate that they have achieved the standards required.

16 Arrangements by which the College manages assessments to test student achievement meet Pearson and awarding body requirements, including reference to approved definitive documentation and effective internal verification processes. The CCVG reinforces the subject-specialist internal verification arrangements, to ensure that expectations are consistently applied. Pearson and the awarding body appoint external examiners who review and comment on assessment instruments, marked student work and internal verification arrangements. External examiner reports indicate that students are tested and marked appropriately against relevant level descriptors. Accordingly, students are able to demonstrate they can achieve the standards set. Definitive records are comprehensive in ensuring that students are rewarded in line with student achievement at unit and programme level.

17 There is comprehensive in-year monitoring of individual student achievement data through termly course group higher education assessment boards, with discussion of, and intervention with, students who are performing below expectations. The outcomes from these boards are reported into the termly College-wide QMM. These meetings provide an opportunity to identify action plans to resolve College-wide issues related to achievement

data, in-year.

18 The College also routinely provides achievement data to employers who are sponsoring students. Monitoring arrangements consider student achievement data for the previous year, at course level, through an annual monitoring report. This is prepared by each Course Manager and results in action planning to improve assessment arrangements and achievement levels where necessary. A Self-Evaluation Document, prepared by the Associate Director of Higher Education and International Development, provides a synthesis of College-wide data and matters arising, which is presented to the QSSA subcommittee of the Board of Governors. The review team heard that the College intends to make this document shorter and more analytical in the future, to allow Governors to focus on key concerns.

Rounded judgement

19 The College has demonstrated its effectiveness in meeting the baseline regulatory requirements for academic standards through its governance structures; internal processes and procedures; adherence to the regulations of the awarding body and awarding organisation; and engagement with the FHEQ.

20 The review team identified two areas for development in this area. The first relates to the further development of processes and procedures for the Board of Governors to ensure its full involvement within the strategic direction of higher education at the College; and the second to the production of a single definitive document for each Pearson award that contains generic and specific learning outcomes to make achievement expectations clear.

21 The review team concludes that there can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.

Judgement area: Quality of the student academic experience

The Expectations of the UK Quality Code for Higher Education (the Quality Code)

22 The College has effective arrangements in place for the discharge of its delegated responsibilities to ensure that it is compliant with Pearson and awarding body requirements and can deliver a quality student academic experience. Comprehensive structures and processes enable quality monitoring to take place on a number of levels through to a subcommittee of the Board of Governors.

23 The processes in place are supported by a management information system (MIS), including a tracking system to confirm the progress of each student, inform monitoring meetings, and facilitate appropriate interventions to enhance the student experience and monitor quality improvement activity.

24 The College responds to data and uses the outcomes of monitoring and review processes for enhancement purposes. For example, data is used to monitor student engagement on the virtual learning environment, enabling early intervention. Assessment boards and the QMMs use data provided by the MIS team to monitor retention, attendance and progression and identify students at risk and take appropriate action, such as a referral to Student Services for advice and support.

25 The College confirms that it has clear admissions procedures, with experience, as well as formal qualifications, taken into account for the mature population of students that it serves. Student interviews are on a one-to-one basis to determine individual needs. Advice and guidance is available at all stages of the admissions process, which students confirm to be valuable. Student support needs identified on application, at interview or on programme lead to additional support from qualified staff, if accessed by students.

26 The College reports that a range of resources is available for students including: specialist rooms, an open access Learning Resource Centre, a study room, laptops, plagiarism-detection software and a virtual learning environment, which hosts handbooks, course materials and other useful information. Students confirm that they find the information on the virtual learning environment helpful and accessible, particularly if studying part-time, with access available outside the College.

27 Staff maintain and develop the currency of their teaching through a range of continuous professional development (CPD) activities. These include observations, learning walks and the use of advanced practitioners who mentor and support teaching staff. Cross-College CPD sessions mainly focus on teaching, learning, assessment and the use of technology for independent learning. The College recognises the need for a greater higher education focused CPD and has commissioned a number of online learning sets for higher education staff. The College CPD processes are both formal and informal, with effective learning taking place within the relatively small course teams who share good practice. The higher education Board of Studies also provides a forum within which good practice is shared.

28 The College confirms the importance of student involvement in the management of its provision, and values their input. The review team heard of the opportunities available for students to participate in course committees and focus groups, become a student representative or Governor, and provide feedback through internal and external surveys. The student focus groups and course committees take place three times each year, presenting students with a forum to provide feedback and raise any concerns. The termly

course representative meetings are organised by the Enrichment Team, which provides extracurricular activities for all students. Academic and pastoral tutorials are in place, with student services providing support on finance, careers, counselling and study support.

29 The review team noted that the satisfaction metrics for part-time students in the last National Student Survey were below benchmark for student satisfaction. The team reviewed the evidence base presented and discussed the issue with the College. The College advised that the sample leading to this outcome was small and that it continues to be challenged with part-time students' participation in the survey. The College has taken some action to address this issue and in doing so has reached the threshold this year. The team considers the College to have taken appropriate action on this issue and that a focus on the National Student Survey is maintained.

30 Overall, the review team found that the College receives and acts on feedback from its stakeholders. College reports and students confirm that it is responsive to student feedback and that students are treated with respect. For example, the introduction of flexible delivery of provision to enable students to attend part-time, should they wish to do so, in order to manage other commitments. Timetables have been adapted to facilitate individual study time while in College and a concern over library access on Fridays for part-time students was addressed by a change of timetable.

31 The College values employer feedback and carries out survey questionnaires to inform the provision. As a result of feedback, for students in employment, the College sends attendance records and progress reports to their employer to keep them informed. Employers contribute to the curriculum as guest speakers, facilitate site visits and provide resources to enhance the quality of the provision. They increasingly provide feedback from students, as a measure by the College to overcome the challenges of obtaining part-time student feedback.

The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

32 The College has in place a clear Complaints Policy that includes the Board of Governors at relevant stages within the complaints process.

33 The Quality and Standards Manager, who is also a Governor with particular interest in higher education and welfare issues, meets with the Head of Student Services regularly to discuss safeguarding and welfare issues.

34 The College has two Student Governors that sit on the Board of Governors, however, neither of these are or have been higher education students. Student representatives meet with their course team and other student representatives on a regular basis throughout the academic year to discuss current issues and how to resolve them.

35 At the time of the review visit the College did not have a higher education student Governor and the team heard from students that they were not aware of this opportunity and would be interested in taking this forward. The College acknowledges that a Student Governor at higher education level would be beneficial, and reports that it will take action on this for the incoming year.

36 The review team found that significant issues can be brought to the QSSA if appropriate. This ensures that there is a line of communication between students and the Board of Governors, even though there may not currently be a higher education student sitting on the Board of Governors. The review team heard within the student meeting that

although the College listens to and acts on student feedback, it tends not to directly inform the student representatives of what actions have been taken as a result of this feedback.

Policies and procedures are in place to ensure consumer protection obligations are met (Competition and Markets Authority guidance)

37 The College has effective arrangements for managing admissions, adopting a personalised approach to providing advice and guidance to students on their higher education study options. The role of admitting students is focused on a small team of course staff, with dedicated administrative support, and students reported that they found the personalised approach extremely supportive. However, the review team noted that the College does not have a formal admissions policy and advises that the College further develop admission processes to include an admissions policy that ensures that policies and procedures are transparent, identifying this as an **area for development**.

38 The College's arrangements for providing prospective students with the information they need to make informed decisions are broadly sound in relation to the provision of basic course information, through standardised webpages. However, the review team noted that there are inconsistencies in the information provided on course webpages. This issue is covered within paragraph 41 of this report.

39 Over the course of the academic year, leading up to and at the time of the review visit, the College had not fulfilled its obligations to provide standardised Key Information Sets (KIS) for qualifying courses, through links to the UNISTATS webpages, through which many of the CMA material information requirements are satisfied. The review team considers that this demonstrates a weakness in the College's approach to this aspect of the baseline regulatory requirement and recommends that the College make available key material information for students that includes Unistats Key Information Sets, identifying this as a **specified improvement**.

40 The College has broadly effective arrangements for ensuring that the terms and conditions between itself and its College-based students are fair and balanced, clear and unambiguous, and that important terms are drawn to prospective students' attention. The Senior Management Team approved the terms and conditions that had been benchmarked against those of other higher education providers and considered from the perspective of a consumer. Students confirmed that they recalled reviewing and signing up to the terms and conditions prior to enrolment and that they considered them fair.

41 While the higher education terms and conditions were easily accessible from each course information webpage, at the time of the review visit, a number of links to relevant policies, which constituted detailed arrangements governing the relationship between the College and its students, were not working and information on the Disabled Students' Allowance provision was out of date. The review team advises that the College further develop the process for monitoring information to ensure accuracy and completeness across all information sources, identifying this as an **area for development**.

42 The College's tripartite partnership with Community Music and the University of Westminster provides a highly effective and valued study opportunity for many who would not otherwise access higher education. However, the respective responsibilities of each partner in the event that a student is dissatisfied with their programme are unclear and there is no guidance as to which set of terms and conditions take precedent over others with regards to specific processes or procedures. The review team considers that the College has not demonstrated sufficient awareness of its responsibilities for aligning with this aspect of the baseline regulatory requirement and recommends that the College clarify and communicate the responsibilities of each partner within the tripartite agreement and

incorporate these in the terms and conditions that apply to students, identifying this as a **specified improvement**.

43 The College's arrangements for ensuring that complaint handling processes and practices are accessible, clear and fair. The student complaints policy and accompanying form are accessible from the College's webpages, alongside other key policies.

Student protection measures as expressed through the Office of the Independent Adjudicator's (OIA) Good Practice Framework, the Parliamentary and Health Service Ombudsman's (PHSO) Principles of Good Administration, and HEFCE's Statement of Good Practice on Higher Education Course Changes and Closures

44 The College has an appropriate Complaints Policy and academic appeals procedure. The arrangements set out how complaints can be escalated from the informal stage to a final internal review stage by Governors, with subsequent referral to the OIA. Over the previous three years the College has had two formal complaints go through the complaints procedure. The College monitors formal complaints through a complaints log and a report on student complaints is routinely provided to the Board of Governors.

45 The review team found that the academic appeals procedure is not clearly available to students, as it is held within the Assessment, Standardisation, Moderation and Verification Guidelines. This was confirmed within the student meeting in which students were unaware of the formal procedure in which to lodge an academic appeal or where to find it - however, students felt confident that if they wished to lodge an academic appeal they could speak to their tutor about the issue and be directed to the process they had to follow. Students who are studying within Community Music use the processes and procedures set out by the University of Westminster to make a formal academic appeal.

46 The College successfully taught out a BSc Clinical Physiology, validated by Middlesex University, which ceased in July 2015. During the beginning of 2016 the College suspended the HNC Photography, for the September 2016 intake, due to insufficient demand and again in the second year for the same reason. The College worked for the best interests of the applicants and ensured that alternative providers were identified. The review team found that the College followed procedures set out within the higher education terms and conditions. These outline clearly what responsibilities the College has when they make changes to advertised programmes and close courses.

47 Minor and major course changes are achieved by following the appropriate guidelines set by Pearson and the awarding body and in consultation with relevant students.

48 The review team found that most students are aware of the higher education terms and conditions set out by the College. However, students who are studying at Community Music are required to formally sign terms and conditions for the College, Community Music and the University of Westminster. The review team found this to be a confusing situation for the students involved. This issue is covered within paragraph 42 of this report.

Rounded judgement

49 The review team makes two recommendations for specified improvements in this area. These relate to the provision of key material information for students, which includes Unistats KIS; and secondly, the need to clarify and communicate the responsibilities of each partner within the tripartite agreement and incorporate these in the terms and conditions that apply to students.

50 The review team considers that the College has not demonstrated sufficient awareness of its responsibilities as a higher education provider for aligning with the baseline regulatory requirements. In addition, the College may not be fully aware of the significance of certain issues, and the plans for addressing identified problems are underdeveloped and not fully embedded in the College's operational planning; therefore this could lead to a serious problem over time without action.

51 The review team also advises the College on two areas for development. Firstly, to further develop admission processes to include an admissions policy that ensures that policies and procedures are transparent; and secondly, the further development of the process for monitoring information to ensure accuracy and completeness across all information sources.

52 The review team concludes that there is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.

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