Adapted Review for Specific Course Designation by the Quality Assurance Agency for Higher Education

Empire College London Ltd

May 2014

Contents

Key findings about Empire College London Ltd

As a result of its adapted Review for Specific Course Designation carried out in May 2014, the QAA review team (the team) considers that there can be **confidence** in how the provider manages its stated responsibilities for the standards of the programmes it offers on behalf of ATHE Ltd, City and Guilds, and Pearson.

The team also considers that there can be **confidence** in how the provider manages its stated responsibilities for the quality and enhancement of the learning opportunities it offers on behalf of these awarding organisations.

The team considers that reliance **can** be placed on the information that the provider produces for its intended audiences about the learning opportunities it offers.

Good practice

The team has identified the following **good practice**:

- the use of tutorial and computer-based recording systems to manage student learning (paragraphs 1.8 and 2.3)
- the response to the outcomes of comprehensive procedures for obtaining student opinion (paragraph 2.8)
- staff support which makes a significant contribution to the enhancement of teaching and learning (paragraph 2.11).

Recommendations

The team has also identified a number of **recommendations** for the enhancement of the higher education provision.

The team considers that it would be **desirable** for the provider to:

- consolidate its policies and procedures into a formal Quality Assurance Manual (paragraph 1.3)
- consider the UK Quality Code for Higher Education indicators at greater depth in order to identify opportunities for enhancement (paragraph 1.5).

About this report

This report presents the findings of the adapted [Review for Specific Course Designation](1) conducted by [QAA](#) at Empire College London Ltd (the College), which is a privately funded provider of higher education. The purpose of the review is to provide public information about how the provider discharges its stated responsibilities for the management and delivery of academic standards and the quality of learning opportunities available to students. The review applies to programmes of study that the provider delivers on behalf of Pearson (BTEC), City and Guilds, and ATHE Ltd. The review was carried out by Ms Camilla Bunt, Ms Ann Kettle (reviewers) and Dr John Hurley (Coordinator).

The review team conducted the review in agreement with the provider and in accordance with the *Review for Educational Oversight (and for specific course designation): Handbook, April 2013.*[2] Evidence in support of the review included documentation supplied by the provider and awarding organisations, meetings with staff and students, and reports of reviews by the Independent Schools Inspectorate.

QAA carries out an adapted review for providers who are also reviewed by another approved body. The *Review for Educational Oversight (and for specific course designation): Handbook, April 2013* provides further details.

The review team also considered the provider's use of the relevant external reference points:

- the UK Quality Code for Higher Education (the Quality Code)
- awarding organisation programme specifications and accreditation requirements.

Please note that if you are unfamiliar with any of the terms used in this report you can find them in the [Glossary](#).

The College was established in 2003 in Ilford on the outskirts of London. It is a company limited by shares with a single director and proprietor. There is no governing body, but an experienced senior management team works closely with the Director. The College is based in an office block in the centre of Ilford. In 2008 the company also set up a branch college in Birmingham, which began teaching in 2009. The two colleges operate and are managed separately, and the Birmingham branch is not part of this review.

The College's aim is to provide career-oriented further education to students from diverse backgrounds through learner-centred teaching, support and guidance, using internationally recognised British qualifications to prepare students for successful careers or higher education. The College enrols both international and UK/EU students. Currently there are 132 students, of which 82 are international Tier 4 students and 50 are UK/EU students following HND programmes. Just under two thirds of students are male.

The College was reviewed by the Independent Schools Inspectorate in 2012 and was monitored in 2013 achieving good grades on each occasion.

At the time of the review, the provider offered the following higher education programmes, listed beneath their awarding organisations with student numbers in brackets:

ATHE Ltd
- Level 6 Diploma in Management (12)

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[1] www.qaa.ac.uk/en/ReviewsAndReports/Pages/RSCD.aspx
[2] At the time of publication of this report, the Handbook has been republished as *Review for Specific Course Designation: Handbook, May 2014*, available at www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2707

City and Guilds
- Diploma in Teaching in the Lifelong Learning Sector (cohort had completed at the time of the visit)

Pearson
- BTEC level 7 Extended Diploma in Strategic Management and Leadership (28)
- HNC Business (9)
- HND Business (76)
- HNC/HND Computing (7)

The provider's stated responsibilities

Within the partnerships with City and Guilds and Pearson, the College has responsibility for teaching and learning, planning and marking assessments, the provision of feedback to students and internal verification. The College is also responsible for staff development, student recruitment and admission, student support, resources, and compliance with quality assurance standards and expectations. The awarding organisations are responsible for programme design and the oversight of the operation of these programmes. The College has a more recent partnership with ATHE Ltd where the awarding body has greater responsibility for assessment.

Recent developments

The number of international students enrolled has remained broadly constant over the last three years. The modest recent expansion has come from the recruitment of home-based and EU students. Following the closure of the Institute of Administrative Management, business management programmes have transferred to ATHE Ltd.

Students' contribution to the review

Students studying on higher education programmes at the provider were invited to present a submission to the review team. A student submission was prepared by a team of student representatives, led by a level 7 student, and based on responses to a student questionnaire issued to all students. The students received clerical support from the College. The comprehensive report covered all the main student-related areas of enquiry for the review. Students met reviewers during the visit to discuss their experience of the College and confirmed the findings of the student submission. The students comprised a representative cross-section of the College intake and contributed positively to the review.

Detailed findings about Empire College London Ltd

1 Academic standards

How effectively does the College fulfil its responsibilities for the management of academic standards?

1.1 The College has effective arrangements for the discharge of its responsibilities for the management of academic standards. Reports from awarding organisations and the Independent Schools Inspectorate confirm the appropriateness of organisational structures for the range of qualifications offered. Roles and responsibilities within a flat management structure are clear and well understood. The Head of Administration, who has responsibility for quality assurance and assessment, and the Head of Marketing, who has responsibility for student admission and tracking, report to the Managing Director, who plays an active part in the leadership of the College. The Head of Studies has responsibility for the organisation of teaching and shares the management of teaching staff with the Head of Administration.

1.2 A framework of meetings takes the place of a formal committee structure. The management staff have daily informal meetings and hold formal themed meetings, resulting in action plans, with relevant teaching and administrative staff in attendance. The Head of Studies chairs scheduled meetings of the teaching staff. Regular, minuted meetings are held with student representatives.

1.3 A new system of quality assurance monitoring by semester, instead of annually, was introduced in September 2013. This involves collecting and reviewing data on areas such as management and leadership, recruitment, learning and teaching, external reviews and student feedback. The new system has, for example, led to immediate action on improving assessment practices. The College has developed a suite of policies, which are reviewed annually, and which are distributed, where relevant, to staff and students as part of the induction process. However, at this stage policies and procedures are not available as a single document for the use of both staff and students. As it continues to develop, it would be **desirable** for the College to consolidate its own policies and procedures into a formal Quality Assurance Manual.

How effectively does the College make use of external reference points to manage academic standards?

1.4 The College makes effective use of the guidance and requirements of its awarding organisations, and recommendations from external verifiers, as reference points for the maintenance of academic standards. It welcomes external inspections and audits as ways of confirming its strengths and of identifying areas for improvement and further development. Following a recommendation from the Independent Schools Inspectorate, the College has reflected on its development objectives and developed an operational plan to measure progress. The reports of external verifiers are considered at meetings of management and teaching staff and action plans are drawn up to respond to any recommendations. The reports are also presented to meetings of student representatives and individual students are shown the reports on request.

1.5 There is currently some engagement with the UK Quality Code for Higher Education (the Quality Code). The reports of awarding organisations and external verifiers indicate that the College is meeting its requirements. The College has become increasingly aware of the importance of alignment with the Quality Code in the management of academic standards. The Quality Code has been posted on the virtual learning environment (VLE) and staff are expected to be familiar with its content and to use it in the preparation of their teaching materials. The College has begun the process of mapping its policies and practices to

ensure alignment with the Expectations of the Quality Code. It would be **desirable** for the College to consider the Quality Code Indicators at greater depth in order to identify opportunities for enhancement.

How does the College use external moderation, verification or examining to assure academic standards?

1.6   The College makes effective use of external verification to assure academic standards. The reports of external verifiers and the Independent Schools Inspectorate confirm the effectiveness of the College's assessment processes in measuring student achievement. The College has developed and keeps under regular review an Assessment Strategy and Internal Verification Policy. Internal verification is carried out by specialist staff.

1.7   Following recommendations by external verifiers, the College has revised assignments to focus more on assessment criteria. It has introduced standardisation workshops for assessors to deal with inconsistencies in marking and quality of feedback. Feedback to students, which teachers must provide within 14 days of an assignment submission, is thorough and supportive. Students expressed their satisfaction with the feedback that they received at every stage of the assessment process. They are, in turn, invited to comment on the marking process through regular perception questionnaires. The team reviewed a sample of assessed work which confirms the effectiveness of the College's assessment and internal verification processes.

1.8   The reports of both internal and external verifiers are used in staff development activities and considered during quality assurance monitoring and in curriculum development meetings. The College has recently introduced a procedure, commended by external verifiers, that enables teachers to track student progress at regular intervals through the assessment process. By this means, attendance and performance problems can be identified at an early stage and remedial action taken.

1.9   The team concludes that the College manages its responsibilities for academic standards effectively, though sometimes less formally than larger institutions. It has sound mechanisms for the management of its academic programmes in accordance with awarding organisation requirements.

The review team has **confidence** in the provider's management of its responsibilities for the standards of the programmes it offers on behalf of its awarding organisations.

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2   Quality of learning opportunities

How effectively does the College fulfil its responsibilities for managing and enhancing the quality of learning opportunities?

2.1   The College effectively manages the quality and enhancement of learning opportunities through the processes outlined in paragraphs 1.1 to 1.3. The recently established set of development objectives focus on leadership and quality enhancement. The semester-based academic monitoring has resulted in a reduction in the time scale for introducing enhancements to teaching and learning.

2.2   The report of the Independent Schools Inspectorate found a number of strengths in the management and provision of learning opportunities which were also apparent to the review team. Applicants are interviewed in order to ensure that courses chosen are suitable. Testing takes place at enrolment in mathematics and English language which identifies the need for any learning support. Student induction ensures that students are fully aware of

procedures for assessment and quality assurance and this is regularly reinforced through the programme. Individual learning support is shared between the unit tutor and a personal tutor and students can also take concerns to the Head of Studies who coordinates pastoral care and support for special needs. The provision for learning support needs is effective and coordinated by well-trained staff.

2.3   Student tracking sheets, which collate information gathered at induction within an individual learning plan, are maintained through regular review and kept within student profile folders. Student progress is reviewed regularly against the learning outcomes, through timetabled meetings with personal tutors. This information is linked to the attendance and achievement record system outlined in paragraph 1.8. These systems alert tutors to student underperformance and ensures early intervention in the case of a student underachieving. It also provides teachers with information about the level of learning support required by each cohort, allowing classroom delivery to be tailored accordingly. Student opinion is positive about both the quality of teaching and the level of learning support received from unit and personal tutors. The use of tutorial and computer-based recording systems to manage student learning is **good practice**.

How effectively does the College make use of external reference points to manage and enhance learning opportunities?

2.4   The College's engagement with external bodies is an essential element of its quality assurance of learning opportunities. It has responded positively to Independent Schools Inspectorate recommendations. The new development objectives document responds to recommendations that the College adopts quality assurance mechanisms which are independent of its awarding organisations. Revised classroom delivery practices respond to recommendations made in 2012-13 that methods should be adapted to increase the level of challenge to students. Classes are well planned, and are suitably varied in method and the level of challenge they provide to students of differing ability.

2.5   Policies and procedures show a developing alignment with the Quality Code, *Part B: Assuring and enhancing academic qualifications*. Student recruitment, admission and induction procedures, learning and pastoral support provisions, student engagement and staff development provision are mapped against the Expectations of the Quality Code.

How does the College engage students in its quality assurance processes?

2.6   The College has effective procedures for ensuring a high level of student engagement with its quality assurance processes. Procedures include a thorough induction process during which student representatives are chosen as part of a comprehensive system for obtaining student opinion. Methods for gathering student opinion through feedback surveys and the student representation system are fully integrated into the management of learning opportunities.

2.7   Student opinion is captured through a well-organised process involving regular surveys and from student representatives. Surveys take place after induction, after assignments, at mid-term and at the end of each semester. Analysis of surveys includes an evaluation of the general level of satisfaction, the impact of teaching on a student's learning and of management, course organisation and facilities.

2.8   Student representation is well organised. Student representatives hold weekly class meetings and attend monthly meetings with management. Student representatives are informed of actions arising and students confirms that these are both appropriate and timely. Recent College responses to student comments have included the replacement of a member of staff and the provision of study and academic writing skills support. The College

ensures that complaints raised by students, using a complaints monitoring form, are addressed as a means to improve quality assurance. The response to the comprehensive procedures for obtaining student opinion is **good practice**.

What are the College's arrangements for staff development to maintain and/or enhance the quality of learning opportunities?

2.9   The College provides a comprehensive staff development process which fully integrates classroom observation, staff appraisal and staff development in order to enhance the quality of learning opportunities. Staff inductions take place each semester and provide both new and existing staff with full information about procedures for teaching, learning and assessment.

2.10   Staff development procedures successfully enhance the quality of teaching and learning. Development workshops disseminate good teaching practice derived from regular peer classroom observation. Twice-yearly staff appraisal is based on regular external class observation of all teaching staff. The College is currently moving from annual to longer term teaching contracts linked to individual staff appraisal.

2.11   The staff development programme complements that provided by its awarding organisations. It has responded to recommendations from the Pearson external examiner that the College improves consistency in assessment by including workshops related to verification and standardisation. Formal, timetabled meetings take place regularly between management and staff with open discussions of areas for improvement of programmes and approaches to guidelines set by the College's awarding organisations. Developments in teaching and learning are communicated to teachers on a systematic basis and staff are encouraged to undertake continuing professional development and attend Diploma in Teaching in the Lifelong Learning Sector courses. Staff support makes a significant contribution to the enhancement of teaching and learning and is **good practice**.

2.12   The team concludes that the College has effective mechanisms for the management and enhancement of learning opportunities in accordance with awarding organisation requirements and external recommendations.

> The review team has **confidence** that the provider is fulfilling its responsibilities for managing and enhancing the quality of the intended learning opportunities it provides for students.

3   Information about learning opportunities

How effective are the College's arrangements for assuring that information about learning opportunities is fit for purpose, accessible and trustworthy?

3.1   The College has effective arrangements for assuring that information about learning opportunities is fit for purpose, accessible and trustworthy. The College's website and prospectus, available online and in hard copy, provide the main information source for prospective students and enable them to make informed choices about their study options. A new website has recently been developed which is well designed and easy to navigate. A range of documents can be downloaded using clearly labelled tabs. These include: the prospectus, the fee structure, a description of each of the courses offered with admissions requirements and a link to the awarding organisation's website, application forms, a selection of relevant College policies, advice on living in London and some electronic resources. The website incorporates plagiarism-detection software for the use of students.

3.2   On arrival, students are given helpful information to prepare them for study. A student handbook covers attendance, behaviour and assessment requirements, as well as the College's policies on complaints and appeals. Students confirmed that the information that they received prior to enrolment and at induction was accurate and useful and that key points were frequently reiterated. Staff are inducted in a similar fashion and provided with a full and clear staff handbook and copies of relevant College policies.

3.3   A new VLE was introduced at the same time as the change of website and is a comprehensive source of information. It provides a repository for teaching and learning materials and teachers upload assignments briefs, study guides and lecture notes. It is also used as a means of communication with both staff and students. Students receive email alerts when new items are uploaded. Students confirmed that information is more accessible and more useful on this new VLE than on the previous one.

3.4   The College's procedures for ensuring the accuracy and completeness of the information for which it is responsible have recently been formalised. The heads of administration and marketing have overall responsibility for the accuracy of the content of the website, the virtual learning environment and other published information. They obtain the approval of the awarding organisations for any information published about them. College policies are reviewed annually and all documents are dated to ensure effective version control. A signing off procedure has recently been introduced to indicate that the content of published information and marketing materials has been checked and approved by management before publication.

3.5   The team concludes that the College has straightforward and effective mechanisms for the management of the information it produces, which ensure that the information is fit for purpose, accessible and trustworthy.

The team concludes that reliance **can** be placed on the information that the provider produces for its intended audiences about the learning opportunities it offers.

Action plan[3]

Empire College London Ltd action plan relating to the Review of Specific Course Designation May 2014						
Good practice	**Intended outcomes**	**Actions to be taken to achieve intended outcomes**	**Target date(s)**	**Action by**	**Reported to**	**Evaluation (process or evidence)**
The review team identified the following areas of **good practice** that are worthy of wider dissemination within the College:						
• the use of tutorial and computer-based recording systems to manage student learning (paragraphs 1.8 and 2.3)	Teachers are able to plan and monitor class activities accordingly to level of learners Attendance and performance issues are identified at an early stage and appropriate action taken Tutorials are taken regularly throughout the semester to monitor student progress/ development	Detailed group profile provided to teachers prior to start of semester Student attendance is monitored on a weekly basis Tutorials are documented in each student academic folder Teachers produce a semester report on each students progress	From September 2014	Teachers and Head of Studies	Senior Management Team	Audit of student academic folders Attendance records Student semester progress reports

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[3] The College has been required to develop this action plan to follow up on good practice and address any recommendations arising from the review. QAA monitors progress against the action plan, in conjunction with the College's awarding organisations.

• the response to the outcomes of comprehensive procedures for obtaining student opinion (paragraph 2.8)	Students are given the opportunity to provide their views on the College Feedback is used in identifying areas of strengths and weaknesses and planning for future development at the College	Obtain student feedback on a semester basis Analysis data received from student feedback Reports of student feedback are passed onto the senior management team for use in planning and development of the College Monthly student rep meetings including response from management to students feedback results	September 2014	Head of studies	Senior Management Team	Student feedback forms Feedback analysis reports Minutes of student rep meetings Semester Quality Assurance form Management team meetings
• staff support which makes a significant contribution to the enhancement of teaching and learning (paragraph 2.11).	Semester teaching observations take place internally and externally to monitor teaching Staff meetings on a regular basis to allow discussion on further development if required	Current teaching observation process with findings documented Develop further on peer-to-peer observation with findings documented	September 2014	Head of studies	Senior Management Team	Teaching observations forms External verifier/internal verifier reports Student marked work Staff minutes of meetings

Desirable	Intended outcomes	Actions to be taken to achieve intended outcomes	Target date/s	Action by	Reported to	Evaluation (process or evidence)
The team considers that it would be **desirable** for the College to:						
• consolidate its policies and procedures into a formal Quality Assurance Manual (paragraph 1.3)	A detailed structured quality assurance manual will allow staff and students to have information on policies and processes prior to starting at the College Make it easier for senior management to review and track quality assurance policy	Compile policies and procedures into a quality assurance manual Review current structure of polices and processes at the end of the semester	September 2014	Head of studies Heads of Administration and Marketing	Director and Senior Management Team	End-of-semester Quality Assurance form Student and staff information packs
• consider the UK Quality Code for Higher Education indicators at greater depth in order to identify opportunities for enhancement (paragraph 1.5).	A detailed mapping of the Quality Code provided to all staff at the start of the semester to be made aware of the requirements to implement/continue meeting the requirements of the Quality Code	The mapping of the Quality Code will be followed throughout the semester - for reviewing of polices and processes Audits by senior management team will use the mapping document to review departments within the College	From September 2014	Senior Management and Head of Studies	Director	External reports Management minutes of meetings End-of-semester Quality Assurance form

About QAA

QAA is the Quality Assurance Agency for Higher Education. QAA's mission is to safeguard standards and improve the quality of UK higher education.

QAA's aims are to:

- meet students' needs and be valued by them
- safeguard standards in an increasingly diverse UK and international context
- drive improvements in UK higher education
- improve public understanding of higher education standards and quality.

QAA conducts reviews of higher education institutions and publishes reports on the findings. QAA also publishes a range of guidance documents to help safeguard standards and improve quality.

More information about the work of QAA is available at: www.qaa.ac.uk.

More detail about Review for Specific Course Designation can be found at: www.qaa.ac.uk/en/ReviewsAndReports/Pages/RSCD.aspx.

Glossary

This glossary explains terms used in this report. You can find a fuller glossary at: http://www.qaa.ac.uk/about-us/glossary. Formal definitions of key terms can be found in the *Review for Educational Oversight (and for specific course designation): Handbook, April 2013.*[4]

academic quality A comprehensive term referring to how, and how well, higher education providers manage teaching and learning opportunities to help students progress and succeed.

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

awarding body 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).

awarding organisation An organisation authorised to award a particular qualification; an organisation recognised by Ofqual to award Ofqual-regulated qualifications.

differentiated judgements In a Review for Specific Course Designation, separate judgements respectively for the provision validated by separate awarding bodies.

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 QAA's review processes.

external examiner An independent expert appointed by an institution to comment on student achievement in relation to established academic standards and to look at approaches to assessment.

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*.

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 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).

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[4] At the time of publication of this report, the Handbook has been republished as *Review for Specific Course Designation: Handbook, May 2014*, available at www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2707

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

operational definition A formal definition of a term, which establishes 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.

provider(s) (of higher education) Organisations that deliver higher education. In the UK they may be a degree-awarding body or another organisation that offers programmes of higher education on behalf of degree-**awarding bodies** or **awarding organisations**. In the context of Review for Specific Course Designation the term means an independent college.

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

quality See **academic quality**.

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. Internal reference points may be used by providers for purposes of self-regulation; external ones are used and accepted throughout the higher education community for the checking of standards and quality.

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.

threshold academic standards 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 for higher education qualifications** and **subject benchmark statements**. See also **academic standards**.

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