Quality Review Visit of Harlow College

March 2018

Key findings

QAA's rounded judgements about Harlow College

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

- **There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable with standards set and achieved in other providers in the UK.**
- **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 Harlow College. The review team advises Harlow College to:

- develop a coherent academic misconduct policy and procedures for higher education that align with the requirements of Pearson's guidance on plagiarism (Quality Code)
- develop a more systematic learning resource planning and budgeting procedure to ensure adequacy of resources, and to produce a plan to remove the currently perceived barriers to access (Quality Code)
- ensure a shared understanding of what constitutes an academic appeal through developing a procedure that distinguishes between academic judgment and process and clearly explains the grounds on which a grade for assessment can be appealed (Student Protection).

About this review

The review visit took place from 21 to 22 March 2018 and was conducted by a team of three reviewers, as follows:

- Professor John Baldock
- Mrs Alexandra Day
- Mr Lyes Bouakaz (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 Harlow College

Harlow College is a medium-sized Further Education College that delivers a wide curriculum including higher education provision from one campus in Essex.

The College's higher education provision is delivered on behalf of two awarding partners - Pearson and Anglia Ruskin University (ARU). The College has 132 higher education students, of which 131 are full-time. They are enrolled on level 4 and level 5 Pearson Higher National programmes and level 5 and level 6 Anglia Ruskin foundation degrees and honours degrees.

Pearson Higher National programmes range from engineering, business and sport to early years education and creative media production. For ARU the College delivers a variety of validated programmes in early childhood and early years professional practice, playwork and education, engineering, bioscience, graphics, multimedia journalism, media studies and business management.

Judgement area: Reliability and comparability of academic standards

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

1   The College delivers 11 honours and foundation degree programmes which lead to franchised awards made by Anglia Ruskin University (ARU). They have been approved using the University's programme approval processes which take full account of UK threshold standards set out in the FHEQ as well as relevant Subject Benchmark Statements. In 2016, owing to falling recruitment, ARU agreed with the College to close the programmes leading to its awards. The College has in place appropriate arrangements to ensure academic standards and quality with student support and progression routes being maintained until and after the programmes close in 2020.

2   The College also delivers five Higher National Award programmes (HNC/D) approved by Pearson UK under a Higher National Centre Recognition Agreement. These programmes have been subject to Pearson's standard approval processes. The programme specifications demonstrate alignment with the FHEQ and the Regulated Qualifications Framework (RQF).

3   For programmes leading to ARU awards, external examiners compare and comment on the comparability of standards and student performance across a number of centres that deliver the programmes, including Harlow College. External examiner reports confirm similarity of standards with other UK higher education providers. The most recent external examiners' reports for the Pearson programmes also confirm the academic thresholds are met.

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

4   The College's Articles and Instrument of Governance follow the spirit of the Association of Colleges' Code of Good Governance. A Search Committee oversees the appointment of new governors.

5   The Standards and Curriculum Committee has responsibilities for curriculum planning, maintenance of academic standards, self-assessment, and ensuring action plans are completed. The committee is chaired by the Governor with responsibility for higher education and provides effective oversight of academic governance. Oversight of data and information is strong. Self-assessment reports and quality improvement plans are compiled by subject and feed into the quality assurance cycle. A wide range of minutes, reports and data from operational heads and meetings are provided for Governor scrutiny and enables annual provider review (APR) assurances to be provided.

6   The Assistant Principal Higher Education and Quality has operational responsibility for the quality of higher education provision, ensuring that higher education quality processes and procedures are consistently applied. The Quality Team have responsibility for quality standards and quality improvement, including the professional development of staff. The College's awarding partners oversee academic governance through annual monitoring reports and an annual monitoring meeting with ARU.

7   Academic freedom is specifically provided for in the Article and Instruments of Governance. The higher education scholarly activity plan lists a broad range of activities.

In addition, discussions with staff in meetings provided a sense of a community of practice with academic freedom and collegiality embedded within the College culture.

8   There are comprehensive measures in place for maintaining oversight of higher education academic risk with the Audit Committee considering a corporate risk register on a regular basis.

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

9   The programmes delivered in partnership with ARU are constructed using core modules provided by the University. The College makes proposals to ARU regarding course content, and these then go through the University's programme approval processes. The Pearson provision is formed of pre-existing units approved by Pearson. The College is currently working with Pearson to develop new tailored units in response to changes in industrial needs. These will be subject to Pearson's standard approval processes.

10   The College operates an effective quality assurance and improvement cycle and engages appropriately in the annual monitoring processes for Anglia Ruskin and Pearson awards. Quality improvement plans are developed and monitored to address areas for improvement.

11   For the ARU programmes, the University Module Leader is responsible for setting the assessments. External examiners and College staff attend departmental Assessment Panel meetings and the ARU Awards Board. Appropriate and effective assessment methods are used by College staff on the Pearson HN programmes, as confirmed by external examiners. The College also makes use of the Pearson assignment checking service. Grades and outcomes are recorded through the self-regulated framework, as per Pearson requirements, and internal quality assurance processes for assessment including internal verification are in place with appropriate reporting.

12   The College's governing body receives reports demonstrating effective use of data in monitoring of academic standards. These include data from module evaluation surveys, and annual monitoring reports containing student performance data. The College examination boards for Higher National programmes also consider a range of data when confirming achievements.

Rounded judgement

13   The College's awarding partners set the academic standards of the higher education programmes it delivers through the application of their own academic frameworks and regulations. The College has demonstrated its effectiveness in meeting the baseline regulatory requirements for academic standards through its governance structures, internal quality processes and procedures, and adherence to the regulations of the awarding partners. There are no areas for development or specified areas for improvement in this judgement area.

14   The review team concludes that there can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable with standards set and achieved in other providers in the UK.

Judgement area: Quality of the student academic experience

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

15   The College has effective procedures for the management, monitoring and review of the higher education programmes it delivers. A comprehensive annual quality cycle operates throughout the academic year to collect and evaluate information on the student learning experience. This cycle includes in-year module evaluation surveys and quality improvement plans, ongoing peer review of teaching staff, internal self-assessment reports as well as annual reports to both ARU and Pearson. Monitoring and review mechanisms focus particularly on continuous enhancement of the student experience. The annual monitoring report to the governors is comprehensive and includes all award outcomes, destination data, module evaluation data, student engagement meeting summaries, student enhancement, an action plan, a review of the previous action plan and comments from external examiners. Students engage in the quality cycle both through the role of the student governor and the participation of student representatives in regular student voice and Staff-Student Liaison Committee (SSLC) meetings.

16   Guidance on academic misconduct for Pearson provision is currently incoherent and dispersed and could lead to variable treatment of students. However, data presented by the College indicates that formally recorded instances of academic misconduct are rare. Students met by the review team knew in principle of potential penalties for cases of academic misconduct such a plagiarism but were unaware of a formal policy. The College indicated that while there was no separate policy, academic misconduct was covered in the academic regulations. However, neither the academic regulations nor the College's Student Disciplinary Policy defines academic misconduct. While the Student Disciplinary Policy sets out potential penalties, the College's guidelines on plagiarism for delivery teams only state that in dealing with cases 'staff must ensure they follow their awarding body guidance'. The guidance on plagiarism issued by Pearson stipulates that institutions' policies and procedures 'should include a precise definition of plagiarism and other forms of academic misconduct'. The review team therefore advises that the College develop a coherent academic misconduct policy and procedures for higher education that align with the requirements of Pearson's guidance on plagiarism, identifying it as an **area for development**.

17   Student views are systematically monitored through module evaluations, learner voice meetings, the National Student Survey (NSS) and programme questionnaires. While satisfaction with ARU response times is lower, there is clear evidence that the College responds to student feedback. The APR data available to the review team showed overall student satisfaction significantly below the benchmark for Year 2 full-time students (58.7 per cent compared to a benchmark of 80.4 per cent). The review team sought an explanation for this anomalous data. The College explained that this was due to a particular cohort of students in engineering who had been affected by a failure by ARU to obtain professional body recognition for Harlow foundation degree students when revalidating their top-up honours degree. This initially resulted in a cohort of Harlow College students no longer being permitted to progress to the top up causing considerable dissatisfaction. The Harlow College senior team subsequently negotiated a solution to the problem and students were able to progress, if they wished, to the honours programme. The source of the anomalous NSS satisfaction data has therefore been resolved.

18   The College reviews spending on higher education learning resources annually in relation to student numbers. The student submission and students met by the review team

were broadly positive about the learning resources available to them, particularly the technology and equipment necessary for the ARU journalism and engineering programmes. Students on ARU programmes also have access to the University's library services. However, there was some concern about the availability of textbooks in both hardcopy and online for Pearson provision. The College explained that reading lists are provided annually to the library so that core texts could be ordered. The College has adopted the ARU resource guidelines for the allocation of learning resources to its HN provision, with two key texts for each unit being provided in the library and other items on the reading list being for guidance only. In addition, students can register for access to online texts on Pearson HN Global. However, at the time of the review, students taking the Early Years programme were still unable to do so. Students can also request access through an eBook platform. While there are various routes through which students could obtain key texts, in practice there are barriers to ready and easy access. As the current small student numbers on the Pearson programmes rise, the College will need to take a more planned and proactive approach to ensuring the availability of learning resources for students. The review team therefore advises that the College develop a more systematic learning resource planning and budgeting procedure to ensure adequacy of resources, and to produce a plan to remove the currently perceived barriers to access, identifying it as an **area for development**.

19   The small number of higher education students allows for ready individual access to staff to remedy problems. Students are supported in applying for Disability Student Allowance and the College conducts risk assessments to determine where additional support is required and assists students in finding local part-time employment. The review team saw and heard substantial evidence of the quality and accessibility of teaching and professional staff and their commitment to supporting student learning, their participation in ongoing training and in scholarship and research relevant to higher education. The 2016 ARU Institutional Review of the College commended levels of support for students. Teaching staff also maintain close links with staff in other colleges, and with relevant local employers and participate in developing innovative programmes and pedagogy.

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

20   The College has effective mechanisms for encouraging student involvement in academic governance. An elected higher education student governor represents students on the Governor's Standards and Curriculum Committee. The higher education student engagement chart shows the range of ways in which students can be involved. There is evidence of student representation in student voice groups and of student engagement regarding their programmes within minutes of the SSLC. In the student meeting it was clear that although some students had guidance from their tutors on being a student representative there was no systematic training for students in this role. However, students confirmed that they are able to influence teaching and learning directly and gave examples of how their feedback had resulted in positive change.

21   In addition to the student representative system, students contribute formally via surveys. These include module evaluation surveys, an internal higher education satisfaction survey and the NSS. Data from these surveys feeds into the quality improvement process. Student engagement outcomes are shared with the governors and the higher education student governor at the Standards and Curriculum Committee meetings and are reported in the annual monitoring process for both ARU and Pearson. The College closes the feedback loop through a 'You Said, We Did' process, through the student voice meetings and via the next SSLC meetings.

22   The College has an appropriate formal complaints process which includes direction to the Office of the Independent Adjudicator (OIA) should internal processes be exhausted. There were two Completion of Procedures letters issued in 2016 and none since. The College attributes this to having a successful student engagement programme that addresses issues prior to escalation. The College provides information about the complaints process within the student handbooks. The complaints procedure is also available on the College website and students are aware of whom to approach if they wish to make a complaint. A complaints log is kept, and a summary of complaints is made to the Governor's Standards and Curriculum Committee on an annual basis.

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

23   The College's higher education Student Recruitment, Selection and Admissions Policy, which is reviewed annually, sets out its approach to admissions including the recognition of prior learning. It is published on the website and made available to prospective students. The College uses a range of appropriate methods to assess a prospective student's suitability for the chosen programme. Students met by the review team had received individualised guidance and support throughout the application process, and felt they had access to the information they needed to make an informed decision to study at the College. Prospective students are also provided with a copy of the Harlow College Terms and Conditions. The terms, which are also published on the College's website, were developed recently and have not yet been reviewed.

24   Overall responsibility for compliance with the Competition and Markets Authority's advice for higher education providers lies with the Marketing Team. Comprehensive and accurate published information about programmes is available on the College's website and in the Higher Education Course Guide. Marketing information is reviewed annually and signed off by the Executive Director for Information, Data and Support and the prospectus is approved by the Principal. Current students access information about their programmes though programme handbooks, the virtual learning environment (VLE) and their tutors.

25   The College has a complaints procedure for all students, and students met by the review team demonstrated awareness of how to make a formal complaint. The procedure is published on the College website and is reviewed periodically.

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

26   The franchise agreement with ARU covers closure of programmes and provides for existing programmes with current students to be taught out. Recruitment onto ARU programmes ceased in September 2016. For Higher National programmes, there is provision in the Harlow College Terms and Conditions for course changes and closure.

27   The College's arrangements in ensuring continuity of provision for students when a programme closes are effective. The impact of course closure is discussed at Executive meetings, Curriculum Planning and the higher education Heads of Academy Group. It was clear in meetings that the implications of closure were comprehensively understood by staff, had been discussed with current students, and that appropriate teach-out arrangements had been put into place.

28   The College has the capability to support the wider higher education sector and staff were able to articulate an effective process for how the College was arranging and managing the transfer of engineering students from another provider.

29   The College's arrangements for non-academic complaints are appropriate. The College's Complaints Policy outlines a process that allows for the fair and timely resolution of student complaints. There is provision for members of staff involved with the investigation of a complaint to be independent and communication between the College and student to remain confidential, as far as possible. In addition, there is an effective process in place to ensure that outcomes from complaints are used to improve the student experience.

30   In the case of ARU programmes, the University is responsible for handling appeals against assessments and students are directed to that process via programme handbooks. For Higher National programmes the College is responsible for appeals against assessment. Basic information regarding the process is provided in programme handbooks with students then being referred to the Harlow College academic/assessment regulations on the VLE and an appeals handbook. The review team found that the College's Appeals Policy does not set out valid grounds for academic appeals and meetings with staff did not fully clarify the issue. The review team therefore advises that the College ensure a shared understanding of what constitutes an academic appeal through developing a procedure that distinguishes between academic judgment and process and clearly explains the grounds on which a grade for assessment can be appealed, identifying it as an **area for development**.

Rounded judgement

31   Arrangements at the College for the academic governance and management of the student academic experience are appropriate and broadly effective in the context of the responsibilities delegated to it by its awarding partners and the baseline regulatory requirements. However, the review team identified three areas for development. They relate to the development of a coherent academic misconduct policy and procedures for higher education; the development of a more systematic learning resource planning and budgeting procedure and the removal of perceived barriers to access to learning resources; and the promotion of a shared understanding of what constitutes an academic appeal through the development of a clear academic appeals procedure.

32   The review team concludes that there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.