



Application for Taught Degree Awarding Powers: Richmond, The American International University in London

Scrutiny team report

May 2016

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About this report

This report reflects the findings of a team appointed by the Quality Assurance Agency for Higher Education (QAA) to conduct a detailed scrutiny of an application from Richmond, the American International University in London (the University) for the power to award UK taught degrees.

The application was considered under the criteria approved by Government in September 2004. In advising on applications, QAA is guided by the relevant criteria and the associated evidence requirements. QAA's work in this area is overseen by its Advisory Committee on Degree Awarding Powers (ACDAP), a subcommittee of the QAA Board.

ACDAP's initial consideration of applications establishes whether an applicant has made a case to proceed to detailed scrutiny of the application and the evidence on which it is based.

If satisfied on this matter, ACDAP agrees that a team may be appointed to conduct the scrutiny and prepare a report, enabling ACDAP to determine the nature of the recommendation it will make to the QAA Board.

Scrutiny teams produce reports following each of the engagements undertaken. The final report reflects the team's findings and is structured around the four main criteria contained in the 2004 TDAP criteria, namely:

- governance and academic management
- academic standards and quality assurance
- scholarship and the pedagogical effectiveness of academic staff
- the environment supporting the delivery of taught higher education programmes.

Subject to the approval of the Board, QAA's advice is communicated to the appropriate minister. This advice is provided in confidence. The minister determines whether it should be disclosed to the applicant. A final decision on an application, and the notification of that decision, is a matter for the Privy Council.

Executive summary

The following is the Executive Summary of the May 2016 report submitted to the Advisory Committee on Degree Awarding Powers. The findings of further scrutiny conducted after this date are reported in the Annex below.

Governance and academic management

Richmond, The American International University in London (the University), is an independent institution owned, incorporated and registered as a non-profit making body in the United States, and a charitable company limited by guarantee in England. It devotes considerable effort to meeting both UK and US requirements, and has undertaken substantial work on credit mapping, credit frameworks, programme documentation and assessment requirements.

The University exercises tight budgetary control. It has achieved surpluses of around one per cent over the past four years and responded with alacrity to under-recruitment in the present academic year, 2015-16. Certain year-on-year adjustments are unavoidable in a context in which not all students expect to complete their degree in a single institution, but Trustees express confidence in the University's financial stability, noting the existence of both £2 million reserves and a secure charitable foundation, which they consider can reasonably be used to mitigate short-term problems. The scrutiny team believes the University will of necessity continue to operate on a very tight budget in an unpredictable external environment, but also that it is well enough managed to have a reasonable chance of succeeding.

Institutional management is very competent, and the Trustees' governance has been strengthened by the recent introduction of an Academic Committee to oversee operations and offer strategic advice, but without straying into management. This Committee contains higher education expertise, but would be further strengthened by the appointment of more external members with current experience of higher education teaching or management. The University has in place a detailed and competent Transition Plan, which will form the basis of institutional activity in the event of taught degree awarding powers being granted.

Academic standards and quality assurance

The University engages with the external expectations visited upon UK higher education institutions, and the procedures for doing so are clearly expressed in its Quality Manual, which contains its future quality management systems in the event of taught degree awarding powers being granted. The systems are broadly but not fully understood by faculty. While the University's relationship with its awarding body, The Open University, has in the past been not without some tension, The Open University supports the present application and its representatives confirmed this support. The two institutions, while they gave differing explanations of the historical problems, agree that they have now been resolved.

The University acknowledges that part of the reason for its past difficulties lies in under-investment in administrative support departments, which, particularly given the demands associated with dual accreditation and the present application (where the absence of a current record of the activities of its own staff proved particularly problematic) have been very stretched. While, should TDAP be granted, the University plans to invest the current £150,000 validation fee in strengthening these departments, this alone may not be sufficient to ensure that all responsibilities, including the additional ones accruing from exercising taught degree awarding powers, will be discharged promptly, systematically and reliably.

The University and its Trustees have a sound understanding of the tensions intrinsic in delivering a UK degree while maintaining the ethos of a US liberal arts programme, and have taken conscientious and, for the most part, successful steps to address and explain those

tensions. In the minority of cases where problems have arisen, the nature of the University's engagement with its students means that it learns about them quickly and, for the most part (a continuing problem with the reliability of academic advice to students appears to be an exception), takes prompt ameliorative action. Overall, the scrutiny team judges that The Open University-validated programmes are aligned with UK expectations, and that the University is taking steps to bring its other programmes into full alignment.

The University is a small and consultative institution, which achieves staff engagement with policy and practice by what can seem lengthy periods of debate. The scrutiny team notes that some diversity in practice across schools is permitted, that staff relations appear harmonious, and that commitment to the institutional ethos is beyond question.

Scholarship and the pedagogical effectiveness of academic staff

The University does not have a means of ensuring that centrally stored curricula vitae of faculty are up to date, and much of the summary staff-related data provided for this scrutiny was inaccurate. The scrutiny team therefore took a cautious approach to the analysis of these data, including requesting further curricula vitae for faculty with key management responsibilities, and drew conclusions, some of which may have been impressionistic, from the materials made available. It is clear that this problem stemmed from omission, as much of the inadequate data, being out of date, worked to the University's disadvantage.

The University hires faculty who are well qualified to teach their discipline, the large majority having a higher degree, many at doctoral level. Most faculty with key programme management responsibilities are appropriately experienced, albeit not always within UK higher education, and the scrutiny team found no evidence of difficulties in this area. Most faculty are student focused in their approach, receptive to student comments, and meticulous in the preparation, delivery and grading of classes; students particularly praised the quality of feedback on assessed work. The scrutiny team found no evidence of any faculty member (including the many hourly paid adjunct faculty, whom the University takes pains to integrate) being rejected by the validating body, in spite of evidence that curricula vitae are, while retrospective, reviewed carefully; external examiners are uniformly complimentary about faculty pedagogic strengths.

The University actively supports and encourages research, and the scrutiny team found a robust research culture in some parts of the University and a commitment to research throughout. Students reported that research influences the teaching they receive; the team, while acknowledging this, found that the University does not have systematic procedures to assure itself that this is so.

The University does not have a formal staff development strategy, but school and department heads are charged with arranging local training and development, with pedagogic support being the responsibility of the Centre for Learning and Teaching. This appears satisfactory, if rather more responsive than systematic.

The environment supporting the delivery of taught higher education programmes

The University pays meticulous attention to the quality and timeliness of evaluations of assessed work, and students expressed themselves content with this. Appropriate targeted support is provided for the University's many international students, and for those with a declared disability. The University both aims to be, and succeeds in being, an open, welcoming and inclusive institution.

The University acknowledges that, as a result of a historical maintenance backlog, some learning resources are less than students expect. The Kensington Library in particular has attracted criticism, and, in spite of improvements having been made, a further upgrade to electronic resources is overdue. The University also depends on a detailed human and technical student advisory service to help students navigate their way through the many choices of course

option available to them; the team found that, in spite of a full and critical report produced in 2013, further work is required to ensure the timeliness and reliability of advice to students on such matters.

The University has a well-established complaints and appeals procedure; the information it makes available to the public and its students is, (subject to the comments in the previous paragraph), trustworthy and accurate.

Professional staff have the same right to development as faculty members: those who met the scrutiny team gave a range of examples of developmental opportunities, which ranged from seminars on retention to a doctoral programme in student engagement.

Overall, the University has considerable strengths. It is prudently and soundly managed by a competent and experienced senior executive team; it has a Board of Trustees whose commitment to the University and its mission is beyond question; it has a well-qualified group of faculty and an outer ring of long serving and dedicated adjuncts; it has a strong research ethos; it has administrative staff equally committed to the enterprise; it has students who, while not uncritical of aspects of learning resources, are attracted to much that the University has to offer and appreciative of the dedication of faculty. Overall, the University has put substantial effort into ensuring that it can offer programmes meeting UK quality assurance and standards requirements as well as those of the USA. While there is evidence that this has been achieved, there also remain areas for ongoing development and vigilance, and some continuing tensions between the priorities and expectations of the two systems are unavoidable.

There is clear evidence of sound financial management, with a surplus returned in each of the last four years and substantial inroads made into a backlog of estate maintenance. As of 2015-16, the University has reserves of some £2 million, and access to a Foundation and Trust which, the scrutiny team was assured, will ensure future viability. While the possibility of the University folding may be remote, however, significant capital investment and the development of more income streams will be necessary if it is to move to a sounder situation of longer term strategic planning.

It is clear that granting TDAP would not be risk free. The University's main challenge relates to an element of financial vulnerability, with which those responsible for governance and management cope well but which permeates some aspects of strategic development and academic operations. The University acknowledges that it is heavily dependent on student fees, and is currently operating on a basis which means that budgets cannot be finalised until student numbers are known. It requires investment in the estate and additional financing for such back-office functions as the Registry and the Department of Academic Affairs and Quality Assurance to ensure that their responsibilities are discharged efficiently and effectively. For example, the present scrutiny was impeded by the absence of current records of faculty academic activity, and the academic advisory system has suffered from under-investment in both human and technical resources. It seems unlikely that the saving from the validation fee will in itself be sufficient to make major inroads into all these exigencies; and, as is the case with any small organisation, infrastructure costs are relatively high. Nor, of course, is the University detached from the wider vulnerabilities associated with a competitive market for both home students and study-abroad students from the United States.

There is no doubt that the granting of TDAP would open doors for the University to invest more in internships and collaborations, and to diversify its academic base: the scrutiny team has no reason to doubt that the University would take a prudent and responsible approach to exploiting these opportunities. The University is a well run, responsive, research-committed teaching institution with adequate campuses in two attractive parts of London; it supports its faculty and students, and teaches programmes where academic standards are not in question. Overall, it is undertaking a form of international education which, while at some points strains the normal priorities and expectations of the UK higher education sector, may in the future become less unusual than it is today.

Privy Council decision

The Privy Council's decision is to grant Richmond, the American International University in London renewable taught degree awarding powers for a six-year term beginning on 17 May 2018 and expiring on 16 May 2024.

Introduction

This report provides a summary of the work and findings of the scrutiny team (the team) appointed by QAA to review in detail the evidence submitted in support of an application for taught degree awarding powers (TDAP) by Richmond, The American International University in London.

The application was considered by QAA's Advisory Committee on Degree Awarding Powers (ACDAP) in November 2014, when the Committee agreed to proceed to the detailed scrutiny of the application. The team appointed to conduct the detailed scrutiny comprised Professor Susan Blake, Ms Kathryn Southworth and Professor David Timms (scrutiny team members) and Ms Carole Reid (secretary). The scrutiny was managed on behalf of QAA by Professor Robert Harris, Assistant Director.

The detailed scrutiny began in December 2014, culminating in a report to ACDAP in May 2016. In the course of the scrutiny, the team read a wide range of documents presented as part of the evidence in support of the application. The team also spoke to a range of the University's stakeholders and observed meetings and events pertinent to the application.

ACDAP's consideration of the final report in May 2016 led to agreement that there were elements of the evidence base that required further development and subsequent verification, including financial and quality assurance arrangements (see Annex for details), and that the Committee could not recommend taught degree awarding powers at that stage. ACDAP's consideration of the final report in May 2016 led to the decision to place the application into abeyance for a maximum period of two years.

Following a formal request from the University, ACDAP agreed in May 2017 that the detailed scrutiny of the application could be reactivated and a scrutiny team was appointed to visit the University and complete the detailed scrutiny. The University submitted its update and supporting evidence.

Members of the original scrutiny team, Professor Susan Blake and Professor David Timms, together with Professor Diane Meehan (who replaced Ms Kathryn Southworth), were appointed to undertake the detailed scrutiny. The original scrutiny secretary, Ms Carole Reid, was replaced by Mrs Jennifer Taylor. The re-activated scrutiny was coordinated on behalf of QAA by Mr Alan Hunt, replacing Professor Robert Harris, who had retired.

The focus of the reactivated scrutiny was on the elements of the application identified by ACDAP as requiring further development. Between May and December 2017, the team read further documentation presented by the University, spoke to a range of stakeholders and observed meetings and events pertinent to these areas. The scrutiny team subsequently produced a report summarising the steps taken by the University and the extent to which these actions had addressed the concerns (see Annex). Although the effectiveness of some actions was not yet evidenced fully, the team reported that substantial progress had been made in all of the areas considered as requiring further development.

The 2016 report and the team's update to the final report (see Annex) were considered by ACDAP at its meeting in February 2018. The Committee concluded that sufficient progress had been made to address the shortcomings and vulnerabilities identified in the 2016 final report. Although the University continues to be financial vulnerable, the current financial management and governance arrangements at the institution were sound and actions taken to manage financial risk were appropriate. While some weaknesses remain, particularly regarding programme validation, the overall effectiveness of procedures for assuring academic standards and quality assurance were sufficient. The Committee, therefore, considered in February 2018

that all the criterion for taught degree awarding powers were met. ACDAPs consideration of the findings led to the decision to recommend that the University be granted degree awarding powers.

Key information about Richmond, The American International University in London

Richmond, the American International University in London is an independent liberal arts university with charitable status under United States and UK law. Its stated vision is to be 'an international University offering high quality undergraduate and postgraduate education, research excellence and public engagement'. Its mission is defined by the pursuit of commitments to internationalism, diversity, excellent teaching and learning, high quality student experience, interdisciplinary research and scholarship, service to the community and business, and the development of globally active citizens prepared for employability and leadership.

The institution was originally established in 1972 as a study abroad centre for American university students and was subsequently approved to grant full degrees under United States authority. It has held accreditation for its US degrees from the Middle States Commission on Higher Education (MSCHE) since 1981. In 1996 the institution developed a partnership agreement with The Open University through which it has delivered UK undergraduate degrees to date. The University operates across two main London campuses in Richmond and Kensington, and also has two study centres in Italy for study abroad purposes and an instructional site in Leeds, Yorkshire.

The University's academic structure and features are characteristic of the US higher education liberal arts model and encourage breadth of study, deferred specialisation, credit transfer, student mobility, substantial contact hours and personal academic advising. Undergraduate degrees follow the American four-year degree structure with use of semesters, the US credit system and Grade Point Average to record student achievement.

As of 2017-18, the University has 23 undergraduate programmes leading to the award of Bachelor of Arts (BA) with dual UK/USA accreditation, a single US-accredited BA award, and nine US-accredited master's degrees. Over 2,000 students are enrolled at the institution, most of who are on undergraduate or study abroad programmes. The University currently employs a total of 94 academic staff 46 of whom are full-time with the remainder part-time.

Detailed scrutiny: taught degree awarding powers criteria

A Governance and academic management

Criterion A

An organisation granted taught degree awarding powers is governed, managed and administered effectively, with clear and appropriate lines of accountability for its academic responsibilities. Its financial management is sound and a clear relationship exists between its financial policy and the safeguarding of the quality and standards of its higher education provision.

1 Richmond, The American International University in London (the University), is an independent institution owned, incorporated and registered as a non-profit making body in the United States and a charitable company limited by guarantee in England. It describes itself as 'a much examined institution'. As a voluntary subscriber to QAA, it is subject both to the QAA review cycle (the 2013 Institutional Review found expectations fully met) and to educational oversight as an alternative provider; it is periodically reviewed by The Open University, with which it has partner institution status; and it is accredited by the Middle States Commission for Higher Education, which judges it as meeting all requirements. Responsibility for monitoring the institutional response to reviews falls to the Department of Academic Affairs and Quality Assurance.

2 Institutional governance is in the hands of the Board of Trustees, supported by subcommittees which include a Finance Committee, an Audit Committee and a newly established Academic Committee, which provides governance scrutiny of the University's academic activities. The Chief Executive Officer is the President, supported by the Provost, who has primary responsibility for academic quality and standards. The President chairs the Executive Committee, which takes responsibility for financial planning and resource allocation; the Planning and Resource Committee reports to both the Executive Committee and the University Board. The University is structured around three schools: Communications, Arts and Social Sciences; Richmond Business School; and General Education (which includes the liberal arts core). Schools hold academic school meetings, which may be split into programme team or departmental meetings for larger programmes.

3 Most programmes are delivered on two long-lease London campuses (first and second-year courses at Richmond, later years at Kensington). A single higher education programme, the BA International Sports Management, is based in Leeds, and the University maintains two study centres in Italy as well as offering a steadily increasing number of study abroad opportunities and work placements. It has no plans to increase its off-site provision, and, following a period when some variation of detail existed between validated and non-validated programmes, all higher education provision is now subject to the same quality and standards processes.

4 The University's Vision is to be an international university offering high quality undergraduate and postgraduate education, research excellence and public engagement. Its Mission includes commitments to internationalism, excellence in teaching and learning, high quality student experience, developing graduates prepared for employability, and providing a service to the community. As the current Strategic Plan expires in 2017, work has started on a Vision and Mission for 2017-22: this will be evolutionary, with no major changes of direction envisaged.

Financial planning, quality assurance, and resource allocation policies are coherent and relate to the organisation's higher education mission, aims and objectives

5 The University has reserves of over £2 million, has maintained surpluses for the last four years, achieving a surplus of £200,000 for 2014-15 on an annual turnover of £21.6 million, and has a planned surplus of £250,000 for 2015-16. Its financial objectives include increasing student numbers to 2,000 full-time equivalents, securing philanthropic income of £3 million annually, and addressing previous under-investment in information technology and estates. While senior members of the Board of Trustees spoke highly of the President's revenue-generating ability, the level of institutional dependence on student fee income, which involves budgetary confirmation after the start of term, is both risky and an impediment to longer-term strategic planning. Nevertheless, the fact that senior managers responded actively to a fairly modest under-recruitment in the current academic year, particularly at master's level and among international students, by readjusting spending targets, making senior appointments in recruitment and marketing, and implementing new income sources offers reassurance of a capacity for speedy and judicious decision making when necessary.

6 Institutional recruitment processes are being tightened, and progress has been made in catching up with a historic estates maintenance backlog. Trustees characterised the approach to financial matters as astute and entrepreneurial, saying that the University has a good product which must be developed and marketed more fully. They also expressed full confidence in the robustness of the University's financial position, and in the soundness of estates and investment planning. They accepted that finance could be 'hand to mouth', and that the University needed to move to a fully sustainable model, but took the view that in the context of tight margins in a small institution, some reliance on charitable donations was reasonable. In this regard the scrutiny team noted that the Richmond Foundation is a separate charitable legal entity set up to receive and hold donations and assets for the purposes of the University: its Trustees constitute a subset of the Board of Trustees.

7 The University's £6 million five-year maintenance schedule has progressed cautiously, with capital expenditure of £1.3m currently outlaid, particularly on the Library, information technology and general refurbishment. The University acknowledges that increasing investment will be a major challenge, and charitable giving, which is partly secured through a foundation overseen by a subset of the Board of Trustees, is critical to this project.

8 Commencing in the present academic year the resource allocation model has been modified, and is now based on schools submitting an operational plan and associated budget to the Planning and Resources Committee, and thence, via the University Board, to the Board of Trustees. The scrutiny team confirms that the documents examined identify and address financial and resourcing needs in the context of institutional priorities, and are appropriately scrutinised. Senior staff expressed broad satisfaction with resource allocation, saying that the University makes best use of the resources available to it; students, while pointing to the desirability of further investment in certain areas, were generally content with learning support.

9 Trustee oversight of quality assurance is undertaken by the Academic Committee, with management responsibility lying with the Provost, supported by the Academic Board. These arrangements are set out in the Quality Manual, which, based on The Open University model and guidance, aims to meet both US and UK requirements. The scrutiny team found this Manual comprehensive and clear: its practical use is explored further on in this report (see paragraphs 34 and 38).

10 Overall, the scrutiny team found the University's financial planning and resource allocation policy to be coherent and supportive of institutional objectives. While, prior to the appointment of current senior staff, certain weaknesses allowed a maintenance backlog to build up, the current approach is very prudent, though the University's proper concern to live within its

means has involved progress being slower than either the University itself or its students would wish. Quality assurance policies have been designed to meet organisational objectives, and the University is taking the best steps it can to manage the need to meet both UK and US requirements.

Higher education activities take full account of relevant legislation, the UK Quality Code for Higher Education and associated guidance

11 The University devotes significant effort to meeting both UK and US requirements, and has undertaken substantial work on credit mapping, credit frameworks, documentation and assessment requirements. Nevertheless, some tensions are intrinsic. For example:

- the fact that a liberal arts structure provides a wider choice of courses (modules) than is customary in the UK has implications for programme documentation and oversight. These implications reflect the fact that while the array of options can appear extensive, the extensive use of the prerequisite system to provide a core for each named programme and the existence of compulsory general courses in English and Mathematics mean that choices are constrained and not always straightforward, particularly for non-US students.
- a UK module is typically defined in a module specification; a liberal arts course may be less strongly linked to a single programme, with more detail determined by the course tutor. The University addresses this by a system of course specification documents on programme approval with a more detailed syllabus approved at school level.
- in dealing with levels of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ), the University does not adopt a strict year cohort approach, but specifies an FHEQ level for each course, using level descriptors and appropriately worded learning outcomes, and ensuring progression through a system of core courses and prerequisites recorded on programme specifications.
- the transferability of credit means that the University attracts study-abroad students not taking full programmes, and loses students who choose to take courses elsewhere. This affects the reliability of forward financial planning, leading to adjustments having to be made following registration, when final numbers are known.

12 Responsibility for ensuring institutional alignment with legislation and external expectations and requirements lies with the Academic Board. This is achieved through the Quality Manual and institutional templates, including those for programme approval, monitoring and review, all of which make due reference to the FHEQ, Subject Benchmark Statements, credit levels, and the UK Quality Code for Higher Education (Quality Code). These references and their practical relevance have been supported by staff training, which its recipients described as useful and relevant. Credit levels in programme specifications appear in both UK and US terms; each course has a course specification document which includes reference to UK and US credits and learning outcomes; and each programme structure and credit are recorded in the University Catalogue.

13 A dual implementation system is in place involving external oversight of The Open University-validated programmes and internal procedures for other programmes. The Open University's representatives told the scrutiny team that while there had been problems in the relationship in the past (see paragraph 39), it was accepted that there had been errors on both sides, no conditions had been imposed in recent validations, no concerns over academic standards had been raised in external examiner reports, and working relations with the University were now good. The scrutiny team found, and staff confirmed, that in a minority of cases procedures for non-validated programmes had not been completely followed: examples included incomplete paperwork, an external adviser not being fully independent, and the absence of a paper trail showing that conditions had been met. While these specific failures had been noted and addressed, the Department of Academic Affairs and Quality Assurance appears

under-resourced for the complex responsibilities associated with a dual accreditation system. The University acknowledges that the additional responsibilities accruing from the possible future exercise of taught degree awarding powers make additional staffing, both for this team and for the Registry, a necessity, and states that it will be met by reallocating the current validation fee of £150,000.

14 The newly established (from September 2015) Curriculum Development Committee is charged with making recommendations to the also newly established Academic Board concerning the academic aspects of new courses and programme proposals, proposed modifications to existing ones and curriculum-relevant regulatory or policy changes. The establishment of these two bodies derives from a perceived need to divide the work of one overburdened and now disestablished committee (see paragraph 76), a perception which the scrutiny team endorses. While an observation of an early meeting of the Curriculum Development Committee suggested that it was still finding its feet, the scrutiny team confirms that these were teething problems known to senior managers and being addressed.

15 The scrutiny team examined the University's use of the Quality Code in the context of its commitment also to achieving sufficient flexibility to ensure alignment with liberal arts degrees and US requirements. The University has spent several years in aligning the two systems, not least through a detailed credit mapping project and working to ensure that programme documentation records and monitors liberal arts degree structures.

16 The Trustees who met the scrutiny team demonstrated their understanding of the tensions involved, taking the view that the liberal arts approach to choice can be managed through a modular approach involving core courses with a flexibility at the margins, which reflects student demand. The Trustees retain a commitment to maintaining the general education possible in a four-year degree, and senior staff stressed the importance of putting subject benchmarks at the heart of all degrees to ensure appropriate focus on a core. By such an approach, they argue, the best of both frameworks can be incorporated.

17 The Open University confirms that the institution takes due account of the FHEQ, Subject Benchmark Statements and the Quality Code, and that relevant provisions are embedded in documentation. The Open University's representatives stated that recent programme validations have not required conditions, and the University's approach to addressing the tensions between the UK and US systems is realistic. Nevertheless, they also emphasised that this had not fully been so two years previously; and the scrutiny team takes the view that ensuring the currency of institutional procedures, as external expectations and sector norms develop over time, will require continuing vigilance, which would be aided by the University continuing to take external advice from individuals with extensive experience of working in other UK higher education institutions.

Higher education mission and associated policies and systems are understood and applied consistently both by those connected with the delivery of the organisation's higher education programmes and, where appropriate, by students

18 The University achieves a balance between British and American faculty at all levels, aided by faculty members with experience of higher education teaching in both countries. Trustees and faculty spoke positively about the University's distinctive approach, including its constructive engagement with the challenges it faces. The institutional ethos is consultative, with papers generally debated by a range of committees over a period of time, therefore, a significant proportion of faculty are engaged in policy development. While this can mean that policy evolution may take time, the institutional view is that this leads to good policy and engagement. Policies and procedures are readily accessible, and their understanding is facilitated by the Department of Academic Affairs and Quality Assurance, and supported by

training. The small size of the institution also means that senior staff are regularly involved in shared discussions, and that central oversight of shared programmes is feasible.

19 While there is a framework to support understanding and consistency of policies and procedures, the scrutiny team identified areas where scope exists for greater rigour in practice: in particular (i) there is, in practice, only limited systematisation of school-level practice in areas such as approving course syllabi; (ii) observations of school-level meetings suggested that, while they were well attended and involved significant interest and debate, policy, process and quality management were not always universally understood; (iii) while policies and pro formae are in place, the associated paperwork is not always complete; (iv) web content in relation to committees is not always up to date; (v) induction, training and information giving, while they exist, are not wholly systematised.

20 The University explains the two systems and degree requirements to students, and sees academic advising as important, offering detailed coverage at induction. Students who met the scrutiny team welcome the fact that they are receiving an education which meets both UK and US standards, and are positive about staff commitment. They showed familiarity with documents such as programme specifications, and said that all course documentation is available to them.

21 Overall the University's distinctive vision is understood, valued and supported at all levels. Appropriate policies and systems are in place, but greater rigour is needed in some areas to ensure full understanding and compliance.

There is a clarity of function and responsibility at all levels in the organisation in relation to its governance structures and systems for managing its higher education provision

22 Following comment from the Middle States Commission for Higher Education in 2011, the Board of Trustees initiated a major governance review, followed by a review of internal committees where some overlap and lack of clarity of function were addressed. The current Constitution of the Board of Trustees is clear and appropriate, as are the terms of reference of the University's executive and deliberative committees, albeit that several are newly established (see paragraphs 9 and 14). The scrutiny team notes in particular that discussion has taken place about the oversight role of the Academic Committee of the Board of Trustees as distinct from the role of the Academic Board, and the University is committed to ensuring that this distinction will be carefully maintained.

23 Each school is headed by an academic dean, also reporting to the Provost. Some responsibilities are delegated to two associate deans (undergraduate or postgraduate) and one school is further divided into departments. Academic school meetings, chaired by the dean and held at least once each semester, have extensive school-level authority for quality management, though their reporting line to the Academic Board is ambiguous, being marked on organisational charts by dotted lines. A Faculty Senate (in effect a formalised academic staff meeting) has consultative functions but no formal powers. The role of head of department is newly established and therefore remains to be developed in practice. The wider choice available to students and the significant use of adjunct faculty means that programme teams are less developed entities than is usual in UK higher education.

24 Overall, the University has made substantial improvements to its structures over the past five years, and while scope exists for further clarification of the functions of school-level committees, clarity of structure now generally exists, each committee having clear terms of reference. While the consultative nature of the University can involve multiple discussions of single issues, the University, recognising that scope may exist for further streamlining, plans to conduct a continuing structural review.

There is depth and strength of academic leadership across the whole of the organisation's higher education provision

25 The Board of Trustees undertakes and responds to an annual evaluation of individual members and is committed to undergoing an external evaluation of its effectiveness as a whole. The Board is committed to appointing an appropriate range of trustees, including more with significant experience of quality and standards in UK higher education. This aim is partially addressed in the appointment of eminent higher education experts and in the establishment of the Academic Committee (see paragraphs 2 and 22), but the University has yet to complete the process of appointing an adequate number of members with current management expertise in UK higher education.

26 The President is required to demonstrate leadership, management and diplomacy, and to take the lead in fundraising and developing effective relationships with a wide group of stakeholders. Trustees hold the President, who has extensive higher education experience on both sides of the Atlantic, in high regard, and the scrutiny team saw his effectiveness in committees and other meetings. The Provost has a clear understanding of UK quality assurance, and provides effective and practical leadership in a variety of committees. His role is pivotal in respect of matters covered by the present scrutiny. Academic managers who report to him include the Dean of International Programmes, who has responsibility for oversight of Richmond's study abroad students and relationships with partner institutions outside of the UK; the Director of the International Internship programme; the Associate Dean (Research), who chairs the Research Policy Committee; and the Dean of Academic Affairs and Quality Assurance and the Associate Dean for Quality and Accreditation, who assist him on matters of academic policy and quality assurance and enhancement.

27 The Trustees appreciate the work of the President and the Provost, and the importance of succession planning in relation to both. At school level and below, managerial and administrative responsibilities are clear, though, here as elsewhere, the University's ethos, being more negotiated than managerial, means that leadership qualities are critical and respect has to, and seemingly is, earned at least as much by personal qualities as by formal role.

The organisation develops, implements and communicates its academic policies and systems in collaboration with those responsible for the delivery of its higher education programmes, and with relevant stakeholders

28 Recent policy developments, particularly in relation to aligning the UK and USA systems, have in good part been undertaken through working groups, for example on credit mapping, assessment norms and the academic workload. Such groups report through the committee structure, and in a small institution a high proportion of staff are therefore involved.

29 Consultation with students takes place through collective forums and the representation system. Students are represented on most committees, and are generally positive about consultation, information giving and communication with faculty, notwithstanding some reservations about the timeliness of information about which courses will run in which semesters. The University also communicates extensively, if not always systematically, with employers, who offer a range of internships: it regards work experience as important, and students value the opportunities open to them.

Academic policies, systems and activities are monitored and reviewed, and appropriate and timely action is taken when deficiencies are identified

30 All policies and procedures are, in principle, subject to quinquennial review, which can be advanced when a deficiency is identified. Academic policies, procedures and activities are approved and overseen by the Academic Board, and monitored and reviewed in annual review and programme revalidation. Annual review is thorough and robust, with all annual monitoring

reports and associated documentation considered by the Academic Board at a special annual meeting, though some minor variations continue at present between validated and non-validated programmes.

Academic risk and change management strategies are effective

31 Responsibility for risk identification and management lies with the Board of Trustees, which it delegates to its Audit Subcommittee, which monitors the Risk Register regularly and formally reviews it annually. Within the University the Executive Committee, which is responsible for risk management, undertakes similar monitoring activity. The University revised its risk register template in 2014: it is now reasonably detailed and includes a traffic light system to indicate severity. It also maintains a separate Academic Risk Register, in which the Trustees expressed broad confidence.

32 The University does not have a specific change management strategy, though the Board of Trustees has strategic planning working days, pays close attention to the importance of succession planning in a small institution, and oversees the production of the new Strategic Plan.

Robust mechanisms are in place to ensure that the academic standards of the organisation's higher education awards are not put at risk

33 Academic Regulations cover, inter alia, assessment norms, examination policy, grading, the conduct and moderation of examination boards, and credit transfer. All moderation and examination meetings and boards derive their authority from the Academic Board.

34 The Quality Manual contains sections on assessment, internal moderation and external examining. Academic standards and the requirements for each award are set out in programme documentation, with learning outcomes specified in programme and course specifications. Assessment norms have been standardised, and approval is required for any departure therefrom. The University operates a system of generic marking and grading criteria not necessarily adapted to the needs of each individual assessment. Markers receive training; standards are checked through moderation; grade point averages are aligned to UK classifications; external examiners are required to confirm equivalence; and the Portal contains information on how the grading systems interrelate.

35 Internal moderation and reconciliation meetings take place at the end of each semester, involving the faculty member concerned and a moderator. Moderation meetings precede degree programme examination meetings, and both are supported by detailed paperwork. A formal school or departmental examination board at the end of each academic year involves all faculty and with external examiners in attendance, to confirm results and deal with mitigating circumstances. The scrutiny team found this suite of meetings thorough and effective.

36 External examiners are appointed for all degree-level programmes: the scrutiny team confirms that they have an appropriate range of UK higher education expertise and that procedures are in place to analyse and respond to their reports. Open University representatives confirmed that assessment, moderation and monitoring are robust, and that the University is assiduous in addressing emerging issues. External examiner reports confirm that that UK standards are applied satisfactorily.

The organisation has the capability of managing successfully the additional responsibilities vested in it were taught degree awarding powers granted

37 The University's Transition Plan, prepared for the possible award of taught degree awarding powers, has been reviewed and updated by the Executive Committee, and is being

implemented primarily through the Provost's office. The Plan is comprehensive, and includes both administrative matters (such as the format to be used for award certificates) and broader issues relating to the balancing of UK and US requirements. A number of steps included in the Plan have already been taken, including a revision of the University Catalogue for 2015-16. Suitable arrangements will be put in place for any currently enrolled student wishing to graduate with an Open University degree.

38 The proposed committee structure is also in place, and as no further changes of significance are anticipated the position can be described as stable. The Quality Manual, under development for some time with significant consultation, is now in force, constitutes the basis of future quality management arrangements, and is fit for purpose. By definition its implementation is only partially tested, though the University has for some time been operating the quality management of programmes not validated by The Open University, mainly, though not always precisely, in alignment with The Open University's required procedures. The scrutiny team noted that some differences between internal and The Open University's procedures need to be resolved, including the use of external examiner reports in annual review. In this regard creating a unified, effective and rigorous system would be a significant step forward, but would be likely to require further investment in relevant support departments (see paragraph 119).

39 The Open University has expressed support for the present application. Its representative described significant progress over recent years, saying that two years previously there would have been concerns, with some tensions and communication problems arising, but that the University now understood the reasons for the requirements being in place. From the University perspective, senior staff agreed that tensions with The Open University had existed, while speaking warmly overall of the considerable benefits which had accrued from the relationship, and emphasising their view that the University is now sufficiently mature to manage its own affairs.

B Academic standards and quality assurance

Criterion B1

An organisation granted taught degree awarding powers has in place an appropriate regulatory framework to govern the award of its higher education qualifications.

The regulatory framework governing the organisation's higher education provision (covering, for example, student admissions, progress, assessment, appeals and complaints) is appropriate to its current status and is implemented fully and consistently.
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40 The University is required to meet the requirements of both the Middle States Commission for Higher Education and The Open University. It has brought these together in the University Catalogue, which contains all definitive course descriptions and programme specifications, together with a set of Academic Policies and Procedures, and the Quality Manual. The procedures, which are thorough, explicit and fit for purpose, cover programme approval, validation and review arrangements, annual monitoring, curricular change, programme discontinuation, assessment, admissions, complaints and appeals, external examining, equality and diversity. The University's understanding of UK expectations reflects and builds on its relationship with The Open University, and now increasingly extends to all programmes, including those in the Richmond International Academic and Soccer Academy in Leeds, and in the Italian study centres.

A regulatory framework appropriate for the granting of the organisation's own higher education awards is in prospect

41 The University has increasingly developed procedures independently of The Open University: these include an internal examination board, as well as the Quality Manual and its attendant forms and templates which it has designed to reflect more closely its own provision.

Criterion B2

An organisation granted taught degree awarding powers has clear and consistently applied mechanisms for defining and securing the academic standards of its higher education provision.

Higher education awards are offered at levels that correspond to the relevant levels of *The framework for higher education qualifications in England, Wales and Northern Ireland (FHEQ)*

42 The University's use of the FHEQ is evident in validation events, and both the Quality Manual and programme documentation refer to it extensively, assigning a specific level to each course and showing that programmes reflect the amount of study identified by the FHEQ. External examiners confirm that programmes are operating at the required standard, and students told the scrutiny team that they understand the requirements of different levels of their programmes.

43 Nevertheless, in a small minority of cases, issues related to the FHEQ have yet to be fully addressed. There was some variability in faculty members' understanding of FHEQ; a few validation conditions demonstrate a similar shortcoming (in particular, a requirement to differentiate more clearly between learning outcomes at levels 5 and 6); one external examiner suggested levels were not entirely understood, another described standards as lower than for comparable programmes, and a third suggested that the time available for subject specialism was insufficient to allow depth of study. These issues, which are possibly indicative of the challenges involved in equilibrating two distinct systems, are untypical, and the University has procedures to respond to such critical comments when they arise independently of The Open University.

Management of higher education provision takes appropriate account of the UK Quality Code for Higher Education, relevant subject benchmark statements, national guidance on programme specifications, and the requirements of any relevant professional and statutory bodies

44 All institutional procedures are mapped against the Quality Code, and both the Provost and the Department of Academic Affairs and Quality Assurance have a record of confronting local demands for academic autonomy where necessary. All relevant programmes take account of Subject Benchmark Statements and follow national guidance on programme specifications: the scrutiny team observed a presentation on new subject benchmarks, and noted that detailed programme specifications, credit levels and curriculum maps were in evidence at a validation event. The University has no accredited professional programmes, but recently successfully applied for professional recognition of its psychology provision.

45 The institutional commitment to delivering a liberal arts curriculum integrated with more specialist programmes means that the University does not offer single honours degrees. While faculty take subject benchmarks seriously, the tension between breadth and depth, in combination with a commitment to student choice and flexibility, necessitates compromise. Accordingly, some external examiners and members of validation panels have questioned whether subject benchmarks are consistently met. At one validation event, when external members pointed to the fact that the degree could be awarded with minimal credits in the

named area, the presenting team acknowledged that it would be 'a struggle' to meet UK requirements alongside the liberal arts structure. At another such event the external member observed that the attempt to make the degree meet US and UK norms was 'not altogether successful'. Module sharing across programmes, while valued by some students, has led panels to comment on overlap or to require imported modules to be revised or replaced.

46 The University's curricula are highly complex: some 50 new or amended course specification documents were presented for approval at a single school meeting. The University takes steps to meet the resultant challenges to students through its comprehensive student advising system and online curriculum planner. Nevertheless, some students encounter problems because they have missed or failed prerequisites; where modules necessary for programme completion are not offered in a particular semester students may need to take an acceptable substitute or extra time to complete; and some UK students fail to appreciate what is in effect a double requirement for progression: not only meeting the relevant learning outcomes but also achieving a specified grade point average.

47 Matters such as these are endemic to the challenge the University faces on a continuing basis, not problems that can be removed by executive or committee decisions. They are ones of which the University is well aware, and which it will continue to address irrespective of whether its present application is successful.

In establishing, and then maintaining, comparability of standards with other providers of equivalent level programmes, the organisation explicitly seeks advice from external peers and, where appropriate, professional and statutory bodies

48 The Open University currently offers advice in the form of academic reviewers, who act as mentors; there is, however, variation in the extent to which this occurs or is found helpful. The Academic Committee, which is another source of academic advice, would be strengthened by the addition of further external members with current higher education management expertise.

49 External examiners have been mandatory for all Open University-validated programmes for many years; the University has recently extended this requirement to all provision. External consultants are mandatory in programme approval, validation, revalidation and review, and arrangements are satisfactory. In an observed event where it emerged that the external member was not sufficiently independent of the presenting team, the problem was noted and addressed.

Programme approval, monitoring and review arrangements are robust, applied consistently, have at all levels a broadly based external dimension and take appropriate account of the specific requirements of different levels of award and different modes of delivery

50 All new programme proposals are required to include a business plan demonstrating rationale, viability and a resource audit: these were thorough and appropriate. The design principles aim to ensure that students' experience has logic and intellectual integrity, in furtherance of which the Quality Manual lists appropriate internal and external design reference points from the UK and the USA. A formal approval procedure is in place, with clear deadlines for each stage, allowing thorough consideration of mission congruence, market, financial and academic viability and resource needs. The scrutiny team confirms that these deadlines are scrupulously observed.

51 The Quality Manual provides a flow chart of the approval and validation process, with sample agendas and team compositions, including external and independent members. The scrutiny team observed both current Open University validation events and validations conducted under an internal pilot system in anticipation of the success of the present

application. While noting that the new system requires operational refinement, the team confirms that senior committees are responsible for ensuring that all conditions have been met prior to commencement.

52 Annual monitoring review currently involves programme assessments, annual programme evaluations and an institutional overview. In the event of the University being granted taught degree awarding powers there will be certain changes in nomenclature and reasoned amendments to the templates and guidance, all of which will be mapped against the Quality Code. The scrutiny team examined documentation from present arrangements and confirms that the University fulfils all commitments. The Open University's response to the most recent annual monitoring review was broadly positive, with few actions required.

53 The University is subject to quinquennial institutional review by The Open University. Quinquennial review, again with planned and reasoned changes to nomenclature and detail, will continue in the event of taught degree awarding powers being granted: planned arrangements include comprehensive documentation and alignment with all relevant external reference points.

54 Programme teams, including students, meet annually to review data (including external examiner reports), evaluate the year (including reflecting on appeals or complaints), analyse trends, review curricular changes and draw up a draft annual programme evaluation for consideration by the Academic Board and, subsequently, the University Board. Institution-wide issues are identified, and examples of good practice systematically disseminated. These arrangements, which were found to be satisfactory, are designed to apply to all institutional provision, including that taking place in Leeds and Italy (see paragraph 40).

55 Students may study for a semester abroad at level 5 in locations approved by the Academic Registry, though major programme requirements at level 6 must be completed at the University, which also places limits on the amount of transfer which may be brought in, particularly at level 5 for UK awards. Credit is also available through internships and service learning (volunteering): students told the scrutiny team that internships are widely advertised; support staff confirmed that placements are always verified and visited; and the scrutiny team observed a validation which made good use of faculty members' industrial contacts.

There is an explicit and close relationship between academic planning and decisions on resource allocation

56 The close relationship between academic planning and resource allocation is manifest in course development, approval, monitoring and review. As a small institution heavily dependent on fee income (see paragraph 5), the University prioritises investments with great care. Nevertheless, despite the University's cautious approach to hiring faculty and its reliance on adjuncts, the scrutiny team found little evidence from any source that teaching has suffered, that module sharing or group sizes have caused problems, or that faculty are other than available and welcoming to students, either in person (full-time faculty keep office hours) or virtually, when quick responses to emails are the norm.

Criterion B3

The education provision of an organisation granted taught degree awarding powers consistently meets its stated learning objectives and achieves its intended outcomes.

Strategies for learning and assessment are consistent with stated academic objectives and intended learning outcomes.

57 The University's Learning and Teaching Strategy's wide-ranging goals and priorities combine academic rigour, personal and professional development, and employability. These

goals are embodied in the combination of a broad liberal arts curriculum with later specialism, together with opportunities for internships and service learning. Study-abroad opportunities and a globalised curriculum also support the intention of developing students' understanding of international contexts.

58 Faculty believe that the integration of US and UK academic cultures constitutes a positive combination of pedagogic approaches; that the existence of a course specification document is a useful structure, which allows US-style freedom in curriculum content within a helpful UK structure; and that the involvement of external advisers and examiners constitutes an important safeguard.

Relevant staff are informed of, and provided with guidance on, the organisation's policies and procedures for programme design, monitoring and review

59 The Quality Manual and associated templates are available on the University portal and provide access to all necessary information, which is supported by regular briefings by the Department of Academic Affairs and Academic Quality. School meetings serve as a practical sounding board for staff to obtain feedback on curriculum development, and the Provost keeps staff informed about procedures with regular emails; the scrutiny team confirms the effectiveness of his translations of policy and quality assurance language for the benefit of faculty members as a whole.

Responsibility for amending or improving new programme proposals is clearly assigned and subsequent action is carefully monitored

60 See paragraph 12.

Coherence of programmes with multiple elements or alternative pathways is secured and maintained

61 The University's basic design principles embrace breadth, depth and coherence. All students are required to meet academic literacy and numeracy requirements, and to take courses outside their major areas of study. The General Education Programme has recently been revised and the scrutiny team found discussions on the levels and learning outcomes within the programme thorough and well informed.

62 Reconciling the liberal arts tradition with UK honours degrees and subject benchmarks is complex. The necessity for flexibility in programme requirements and courses contributing to different programmes creates challenges in programme construction, tracking prerequisites, and measuring student retention: the development of the University's Student Hub, bringing together a range of services, was in part a response to these issues. In spite of the existence of an online Degree Planner, some students continue to rely on possibly outdated paper systems, and the Planner itself has been reported as causing difficulties. Two areas in particular attracted criticism. Firstly, the uncertain reliability of advance information as to which courses would run and when: while the University tries to ensure that the availability of core courses is set well in advance, timetabling takes place one semester at a time, and reflects student demand. Secondly, there was some concern about clarifying detailed degree requirements with the Registry: the University acknowledges the need to strengthen the Registry's staff complement. Students also reported waiting lists for some modules which might not be offered during their stay, though senior staff stated that if a student needed to take a course to graduate then it would always be offered.

Close links are maintained between learning support services and the organisation's programme planning, approval, monitoring and review arrangements

63 As previously noted (see paragraph 56), a close link exists between resources, including learning materials, and quality management; the scrutiny team confirms from its reading of revalidation reports that learning support, with particular reference to Library needs, is considered in all such events.

Robust arrangements exist for ensuring that the learning opportunities provided to those students that may be studying at a distance from the organisation are adequate

64 As previously noted (see paragraph 3), the University pays close attention to supporting and encouraging both placements and study abroad; its support for students undertaking study leading to Open University or its own awards is fully aligned with *Chapter B10* of the Quality Code.

Through its planning, approval, review and assessment practices, the organisation defines, monitors, reviews and maintains its academic standards

65 As previously noted (see paragraph 34), the University's planned quality management procedures to be implemented in the event of taught degree awarding powers being granted address academic standards.

Assessment criteria and practices are communicated clearly to students and staff

66 The University's assessment criteria and practices are widely available both electronically and in hard copy. Details of assessment assignments and examination papers are developed from course specification documents and fully outlined in syllabi, which are considered within schools and sent to external examiners prior to publication. Faculty members characterised assessment training as predominantly informal, but also drew attention to a best practice workshop, to school-level moderation meetings which serve to develop awareness, to workshops, and to informal advice and support from the Centre for Learning and Teaching. Faculty members described methods used to detect plagiarism; the fact that the scrutiny team observed a rather high number of plagiarism cases reported at an examination board may indicate rigour in detection, and certainly reflects the priority afforded the security of academic standards. Students confirmed that the relation between learning outcomes and assessment is clear, that clarification is readily available, and that plagiarism is regularly discussed and explained.

Assessment practices fully cover all declared learning objectives, learning outcomes and modes of delivery

67 A system for approving variations to assessment norms helps ensure that appropriate methods are available to examine all kinds of learning outcomes, including those relating to internship performance. Assessments and examination papers are subject to school-level discussion and approval. A dedicated section of each syllabus defines the relationship of learning outcomes to programme outcomes, and how each such outcome is assessed.

Appropriately qualified external peers are engaged in the organisation's assessment processes, and consistency is maintained between internal and external examiners' marking

68 External examiners approve draft examination papers and summative assessments; they have access to all assessed work; they may attend 'live' assessments such as the senior seminar; and they are expected to attend formal school examination boards, signing off mark sheets.

69 Internal moderation is thorough, involving internal moderation and reconciliation meetings, useful pro formae, reports being received at internal assessment boards, and a synoptic report provided at final boards. The scrutiny team did note some variability in the quality and detail of the completion of the pro forma and that the reasons for changes having been made were not always clear. Nevertheless, on the whole references to internal moderation reflect the process identified in the Quality Manual: at one formal school assessment board, for example, it was explained that, as a result of suspected over-generous marking a larger sample had been moderated (following which the initial marks had been confirmed); at another Board a suggestion that because a set of grades was inconsistent with students' classifications all grades should be raised was overruled by the Chair on the grounds that both internal and external moderators had approved them.

70 On the whole (see paragraph 43 for the few exceptions) external examiners corroborate grades and are content with assessment, student achievement and academic standards, as is The Open University. Full and informative student records inform decision making, and the scrutiny team confirms that the University is prepared to take difficult decisions and dismiss students where necessary, a perception confirmed by the awarding body. Nevertheless, an observation of the Academic Progress Committee, which considers students with consistently high or low grades, suggested that, while all decisions appeared judicious and humane, in a few cases decisions seemed to rely as much on personal knowledge and impressions as on a formally recorded information base.

The reliability and validity of the organisation's assessment procedures are monitored, and its assessment outcomes inform future programme and student planning

71 The Provost monitors assessment, reporting to relevant bodies; the consistency of grading is monitored through internal and external moderation; and consistency across subject areas is checked by the Academic Registry and the Provost's Office, and included in annual programme monitoring. The structure of school assessment boards allows both informal subject-level discussions and more formal, recorded feedback and discussion across cognate subjects: matters identified as meriting further attention are referred to the Academic Board. Data on student achievement are formally recorded and available to schools for analysis, monitoring and enhancement.

Clear mechanisms are in place for use when a decision is taken to close a programme or programme element, and in doing so, students' interests are safeguarded

72 The University's claim to take seriously its obligations to students affected by programme closure was supported in the discontinuation of a programme in 2009, when arrangements were made for extra courses to be delivered to enable students to complete. During the scrutiny period, the discontinuation of one programme was taken through the early stages; it was based on a clear rationale, and the scrutiny team was able to hear a discussion at the relevant school meeting, which was understandably controversial. The Provost acknowledged that when the decision had been taken the current procedure was not fully in place. While the team confirms that the meeting agreed on the necessity of a teaching-out plan coming to an early meeting of the Academic Board, it was unable to find a record of this from the minutes of the Board's next three meetings.

Criterion B4

An organisation granted taught degree awarding powers takes effective action to promote strengths and respond to identified limitations.

Critical self-assessment is integral to the operation of the organisation's higher education provision and action is taken in response to matters raised through internal or external monitoring and review

73 The University is, as it claims, (see paragraph 1) a much examined institution. In addition to the self-critical documentation of necessity prepared for a plethora of successful external reviews, scrutinies and validations, it has taken steps to plan its future approach to annual monitoring (see paragraph 52), which will include an institution-wide annual report. The scrutiny team found evidence of institutional responsiveness to issues raised, whether by reviewing bodies (validation reports are scrutinised systematically to identify issues of generic concern), external examiners or students, and of the responses being monitored and signed off.

74 The creation of the Student Hub (see paragraph 62) is a response to student concerns about access to integrated and reliable information and advice. The University's culture, as will by now be apparent, is one of transparency - between staff and executives, among faculty, and between staff and students. Any problems with teaching are dealt with directly and quickly. The scrutiny team observed a frank discussion with a dean relating to students' concerns about a lecturer, and students told a validation panel that poor teachers 'don't last long'.

Clear mechanisms exist for assigning and discharging action in relation to the scrutiny, monitoring and review of agreed learning objectives and intended outcomes.

75 In relation to meeting the conditions of validation, the scrutiny team sampled a range of documents, all of which were satisfactory. The Learning and Teaching Policy Committee considers all external examiner reports, and the scrutiny team learned that it was from external examiners' comments on over assessment that the Assessment Norms project was initiated.

76 The ability of senior committees to monitor the full range of quality assurance issues caused the University to reduce the load of the Learning and Teaching Policy Committee by establishing the Curriculum Development Committee to undertake detailed scrutiny of new course proposals, and the Academic Board to undertake the former Committee's regulatory and oversight functions. While these committees have yet fully to be fully established (see paragraph 14) the team takes the view that their establishment potentially enhances institutional quality management.

Ideas and expertise from within and outside the organisation (for example on programme design and development, on teaching and on student learning and assessment) are drawn into its arrangements for programme design, approval and review

77 The University draws on external expertise in programme design, approval, monitoring and review, and gains some support from The Open University's academic reviewers. Employer contributions to programme development are mandatory, and the scrutiny team found evidence of curriculum changes being made in response to external examiners' suggestions. The extensive use of adjunct faculty also enables the University to benefit from their experience of programme design at other higher education institutions or as professional practitioners.

Effective means exist for encouraging the continuous improvement of quality of provision and student achievement

78 The University takes the view that continuous improvement derives from a combination of top-down and bottom-up initiatives. Consistently with this, meetings often involve substantial items of information and policy dissemination balanced by lively discussion and debate.

79 The University cites its strategic and policy documents; its Credit Mapping and Assessment Norms projects; its establishment of the Student Hub; its subscription to the Higher Education Academy; its establishment of the Centre for Modern Languages; and its Centre for

Learning and Teaching as a platform for sharing good practice as evidence of its commitment to enhancement. It also cites annual monitoring, which includes an enhancement action plan and its engagement with students and their representatives, who are involved in programme development, enhancement and review.

80 The University's identification and follow up of issues through the committee structure is assiduous and its responsiveness to student suggestions evident. The President holds regular meetings with Student Government representatives and the scrutiny team observed students' willingness to raise issues, including difficult ones, with the President himself, as well as with more junior staff and faculty.

C Scholarship and the pedagogical effectiveness of academic staff

Criterion C

The staff of an organisation granted powers to award taught degrees will be competent to teach, facilitate learning and undertake assessment to the level of the qualifications being awarded.

81 The University provided three data sources for the scholarship and pedagogical effectiveness of its academic staff: the QAA Academic Staffing Template spreadsheet (the Template); a set of curricula vitae provided at an early stage; and a further set of vitae of Staff with Key Programme Management Responsibilities towards the end of the scrutiny. None of these proved wholly reliable. For example, eight faculty were entered in the Template as having no degree, whereas their vitae showed that six did have degrees, including at doctoral level; two faculty were incorrectly listed as holding reviewer contracts with QAA; and the Template listed some faculty for whom no vitae were provided while some vitae were provided for faculty not listed in the Template.

82 The University does not have a standard format for collecting staff information, and the curricula vitae scrutinised ranged from one page to 25. It does not routinely update contents, and in many cases the vitae appear unchanged from the points at which staff submitted applications for their posts.

83 For these reasons it is not possible, on the basis of the data supplied by the University, to make confident judgements on all quantitative aspects of the Criteria. This section of the report is therefore more than usually reliant on other primary information such as annual reports for The Open University and external examiner reports.

All higher education teaching staff have relevant academic and/or professional expertise

84 The University is committed to excellence in teaching and learning, and the Employment Handbook outlines specific requirements for Richmond faculty: these are expressed in the job descriptions, and, with specified exceptions (notably an MBA for faculty teaching business-related courses), typically require a PhD in a relevant field or for the applicant to be working towards one.

85 Most faculty are well qualified. In the Richmond Business School, for example, 50 per cent have PhDs and two are working towards one, 10 have master's degrees (mainly MBAs), and only three have lower qualifications, of whom two have professional qualifications and significant professional experience. This positive view is supported by external comment, which confirms that qualifications and expertise meet The Open University requirement to be appropriately qualified for the aims and learning outcomes of the programme to be fulfilled. The completed annual monitoring pro forma for academic year 2013-14 notes the appointment of 13 new faculty without objection from The Open University; while assurances were sought on

induction and development plans for nine new faculty appointed to a single subject area, their acceptability was nowhere called into question.

All higher education teaching staff have relevant engagement with the pedagogic development of their discipline (through, for example, membership of subject associations, learned societies and professional bodies)

86 It is in this area that the University's summary data are least helpful, not only to the scrutiny team but also to the University itself, since Template entries almost certainly understate faculty members' active engagement with their discipline. The nature of the curricula vitae provided made this difficult and time-consuming to establish, but the team undertook a sample analysis of data on the 50 members of the largest school (Communications, Arts and Social Sciences) who both appear in the Tables and have submitted a curriculum vitae.

87 The Tables state that five out of 50 faculty are members of the Higher Education Academy. This is explicit in only one curriculum vitae, though in another case a higher education teaching qualification carries associate membership. It is not possible to verify the status of the other three claims, though the professional background of one makes the claim of full fellowship improbable. In addition, three out of 50 faculty are stated to be members of the Institute for Learning; this is not verifiable.

88 The picture regarding membership of subject associations, learned societies and professional bodies is similar. Most tabular claims are unverifiable, though more faculty have subject-related engagements than the Tables suggest. The Tables list 17 members of subject associations; according to the curricula vitae the figure is nine, though since in relation to learned societies the figures are reversed, the problem may involve confusion between a learned society and a subject association. In this particular school membership of professional bodies is unlikely to be common. Taken overall, 36 out of 50 faculty are active members of a subject association, learned society or professional body.

89 External examiners are uniformly complimentary about the pedagogic strengths of faculty known to them. Their report form includes a section inviting comment on 'The quality of teaching and learning, as indicated by student performance', and all 14 reports from academic year 2013-14 made positive comment: the teaching is 'high standard'; the teaching team 'exemplary'; the teaching is 'excellent', 'clearly excellent', 'nothing but praise for the...quality of teaching and learning'. Such comments occur across both schools where external examiners are appointed, and at bachelor's and master's levels. Students were similarly positive, volunteering complimentary views both at validation events and in meetings with the scrutiny team. They confirmed that their lecturers are 'good', especially in relation to their ability to integrate views from different cultures into their classes, and praised the quality of feedback on assessed work.

All higher education teaching staff have relevant knowledge and understanding of current research and advanced scholarship in their discipline area and such knowledge and understanding directly inform and enhance their teaching

90 The University's Mission includes a commitment to research excellence, developing which has been a strategic objective in the three years up to 2017. Research is a promotion criterion, and the University's Journal of Research showcases research activities, containing extracts from the work of 14 faculty, selected lists of publications by them, and 25 others, as well as three pieces co-written by students or alumni.

91 The University has a Research and Professional Engagement Strategy to which no action plan is attached, though some of its objectives, including the establishment of a Research Policy Committee, have been achieved. In the course of the scrutiny the Committee considered a list of research outputs, compiled by the Chair at the request of the Board of Trustees

covering academic year 2014-15. The list contained three monographs or edited volumes, 32 peer-reviewed articles, 22 other articles, 15 conference or seminar presentations and 18 academic blogs.

92 The Strategy articulates the complementarity of teaching and research, and tasks the Research Policy Committee with considering ways in which research can support and improve teaching. The QAA Institutional Review of 2013, describing the University as having a strong ethos of research-informed teaching, noted that this is not included in the Committee's terms of reference. This remains the case, in spite of the facts that course approval documentation requires proposers to address this point and that the Learning and Teaching Strategy describes the institution as 'a teaching intensive university which is committed...to the belief that research activity and engagement with professional activities can support excellent teaching'. While annual monitoring reports make little or no reference to the relationship between research and teaching, students spoke positively about it: they had a broad awareness of faculty research interests and outputs, and one student had been a research assistant to a faculty member. This finding is consistent with that of the QAA Institutional Review report.

93 One strategy to increase research has involved establishing research clusters and supporting them with modest central funding. The Research Policy Committee reviews the performance of these clusters, if not wholly systematically, and school-level monitoring is mainly confined to listing seminars and conferences. Nonetheless, the scrutiny team saw evidence that the University actively supports research: for example, faculty normally have a time allocation of 60 per cent teaching, 20 per cent research and 20 per cent administration, but the system permits hours to be banked, such that up to a semester may be dedicated to research alone. In the course of the scrutiny the University also made progress on a new workload model to provide a clearer study leave matrix, with adjuncts covering teaching.

94 The University also supports research through central funding of around £12,000, with faculty members entitled to apply for up to £800 a year from a Faculty Development Fund. The system is widely understood, and the Research Policy Committee exercises proper oversight of applications, uses appropriate criteria to distribute funds, and broadly monitors the results. An observation indicated that members of the Research Policy Committee believe that research and scholarship are valued as routine parts of academic working life; observations of other meetings without a specific research focus confirmed this view.

95 The large majority of faculty have a higher degree, many at doctoral level, but the data on other forms of scholarly output are, as before, unclear. The scrutiny team analysed a set of faculty from the School of Business and Economics, listed in the Table, for whom *curricula vitae* were provided. As might be expected, consultancy and professional practice feature strongly, with one or both listed in the Tables in relation to 14 out of 21 faculty; of these the *vitae* confirmed seven. The Tables cited nine out of 21 faculty as having published articles in learned journals in the previous three years; of these two could not be verified, but two faculty who had published were omitted from the Tables. The Tables listed three out of 21 as having published chapters in books; two could be verified, and one who listed publications in the *vitae* was missed in the tables. The Tables list two out of 21 faculty as having published books; one could not be verified, and the other claimed the second edition of a book originally published in 2007.

96 Overall, 15 out of 21 of the faculty listed in the Tables, and for whom *curricula vitae* were provided, had made some sort of scholarly or professional contribution to their disciplines in the form of public output in the last three years. The President's claim that there is a research culture, with the majority of faculty research active, is true of this School, though not primarily in a manner relevant to the Research Excellence Framework. A brief analysis of research outputs listed in the *vitae* of members of the School of Communications, Arts and Social Sciences suggests that this School is more conventionally research active.

All those teaching on doctoral programmes offered wholly or in part by courses of instructions have relevant active personal engagement with research and/or advanced scholarship to a level commensurate with the degrees being offered

97 The University has no such programmes.

All higher education teaching staff have relevant staff development and appraisal opportunities aimed at enabling them to develop and enhance their professional competence and scholarship

98 The University does not have a formal staff development strategy, but its Training and Development Policy charges school and department heads with arranging local training and development. New faculty are mandatorily observed by school managers and subject to early student evaluation. Peer observation and mentoring, though not mandatory after the first year, contributes to deans' awareness of faculty performance. Students confirmed that they had attended observed classes, and observations confirmed that the University is unusually frank and responsive in discussing teaching quality with students. Performance review is integrated with a course evaluation scheme under which students score faculty on a scale of 0-4, with deans tasked with addressing scores below 3. Arrangements for adjunct faculty involve formal feedback meetings with programme convenors, early student evaluation at two feedback points, and mandatory decanal teaching observation.

99 Providing increased opportunities for professional development for academic and administrative staff is a key objective of the Human Resources Strategy, in furtherance of which an intended action is to develop a planned and cohesive approach to learning and development with a direct link to institutional goals. This Strategy currently focuses on such non-academic goals as health and safety, and on such academically related ones as the use of the information system and virtual learning environment. Oversight of staff development now falls within the remit of the Academic Board, though its minutes do not precisely reflect this. The scrutiny team's examination of the minutes of the 12 most recent meetings of the former Committee and the first three meetings of its successor body, however, found only limited evidence of discussions of staff development, and no reference to staff training or pedagogic development.

100 The University ascribes primary responsibility for pedagogic staff development to the Centre for Learning and Teaching, a largely virtual entity led by the Dean for General Education and supported by a steering group which includes representatives of all three schools and the Library. The Centre mounts three day and half-day conferences annually on topics that have included employability, assessment, technology-supported learning, and student engagement; it provides a small resource library containing information provided at these events; and it administers the Faculty Development Fund (see paragraph 94). These activities are reported in the School of General Education's operating plans in a mainly factual manner, though the plans also make reference to Strategic Plan objectives; and the most recent such plan includes future performance measures. While the Centre appears to have made a useful contribution to staff development, the underlying strategic approach to its operations appears currently to be largely restricted to promotion of membership of the Higher Education Academy.

Staff with key programme management responsibilities (for example, programme leaders and assessment coordinators) have relevant experience of curriculum development and assessment design

101 In its Critical Self-Analysis the University implies that all faculty involved in designing new programmes have 'key management responsibilities'; this definition, however, is broader than the Criteria specify. The initial difficulty in identifying staff whose programme management responsibilities are 'key' stems in part from the University's concept of 'programme'. Most awards are named by discipline 'with Combined Studies', for example BA (Hons) History with Combined Studies, and are more varied in content than is typical in the UK; programme

specifications do not include the names of programme leaders or teaching faculty; and departments and their heads are a recent innovation.

102 In addition, as previously indicated (paragraph 82), the Tables provided do not enable such faculty to be clearly identified. In discussion, however, the University identified 14 faculty, including most but not all deans, associate deans, heads of department and a small number of other named faculty as falling into this category, and provided updated curricula vitae for 12 of them. They have all had extensive recent experience of curriculum and assessment design within the University, and many are longstanding faculty members, only three having been appointed within the last five years. Most have taught elsewhere in the UK, many have taught in the United States, and only three are new to higher education teaching. Several have designed short courses for other higher education institutions, but only two have been extensively involved in higher education curriculum design.

103 Although these data suggest relatively limited experience of programme design other than at the University, other evidence sources affirm the competence of key staff in curriculum development and assessment design. For example, an observation of an Open University validation involved lengthy (and well informed) discussion about achieving focus and coherence, and about how a four-year liberal arts degree articulates with the three-level UK system. Subsequent observations suggested that the UK requirement to demonstrate the learning outcomes associated with one level before moving to the next was potentially problematic, and showed an external examiner as commenting that markers were perhaps not understanding the difference between learning outcomes for levels 5 and 6. Nevertheless, every course or programme submitted for validation was approved, sometimes with conditions, and external examiners generally complimented the University on curricula and assessments: curricula were 'high quality', 'good quality', 'generally well-written', 'challenging and clear to students', 'engaging and well conceived'; assessment was 'appropriate' and 'well-designed'.

Staff with key programme management responsibilities have relevant engagement with the activities of providers of higher education in other organisations (through, for example, involvement as external examiners, validation panel members or external reviewers)

104 Six of the 12 faculty with key programme management responsibilities where curricula vitae were available have served as external examiners elsewhere, one of them at PhD level. While all have experienced Open University validation as members of proposing teams, only one has served as a member of a validation panel elsewhere. No member of staff has held a contract as a QAA reviewer. While many have sound, and in some cases eminent, scholarly profiles, none participates in such external events as lifelong learning networks or regional development forums. Five vitae list roles relevant to this section: external evaluator for the Middle States Commission for Higher Education; consultant to another university in programme design; external moderator for a prestigious art-based institution; external member in promotion interviews; and member of a QAA benchmarking review group. Three of these five are also among the six with external examining experience; one is also the single faculty member with validation experience elsewhere.

D The environment supporting the delivery of taught higher education programmes

Criterion D

The teaching and learning infrastructure of an organisation granted taught degree awarding powers, including its student support and administrative support arrangements, is effective and monitored.

The effectiveness of learning and teaching activities is monitored in relation to stated academic objectives and intended learning outcomes.

105 Institutional arrangements to monitor the effectiveness of activities in relation to stated academic objectives are enshrined in the Quality Manual and appear satisfactory.

Students are informed of the outcomes of assessments in a timely manner

106 The University describes timely feedback on assessed work as a key element in student learning and development. The QAA Institutional Review of 2013 noted that the University lacked a formal policy and that students reported variability both in timeliness and quality; the University responded by adopting a protocol, Feedback Norms, requiring feedback on course work normally to be provided within 10 working days; relevant information to be included in the syllabi; and compliance to be monitored through a revised course evaluation form followed up as necessary by decanal action. Students told the scrutiny team that they receive feedback in good time, usually within a week.

Constructive and developmental feedback is given to students on their performance

107 Feedback norms specifies that feedback should enable students to understand their strengths and limitations, as well as how to improve. It specifies that the nature of feedback should be clearly stated in course documentation and be related to the published criteria. It encourages the use of a structured feedback sheet and requires deans to circulate exemplars. Students confirmed the clarity of these arrangements, and welcomed both the use of structured feedback forms and the fact that they also receive formative feedback on assignment drafts.

Feedback from students, staff and (where possible) employers and other institutional stakeholders is obtained and evaluated, and clear mechanisms exist to provide feedback to all such constituencies

108 The University uses five formal mechanisms to elicit student feedback: course evaluations; exit interviews; withdrawal forms; the graduate information form; and the student satisfaction survey. Collectively these offer students the opportunity to comment both on courses and programmes, and on their overall experience of the University. The results are analysed by the Student Experience Committee, reported to the Academic Board and used in annual monitoring and the Retention Strategy.

109 The University's Student Government fulfils many of the functions of a UK students' union. There is no student representation at Board level, but the Academic Chair of the Student Government sits on the Academic Board, and a representation system operates on most committees. Major meetings, important for face-to-face discussion with faculty, are open to all students in those subject areas and involve frank and engaged exchanges about matters which include external examiner reports, annual monitoring, and faculty evaluations. The scrutiny team found extensive evidence of their outcomes leading to improvements, and of student views being incorporated into policy. Service departments elicit user feedback with responses reported in 'You said, we did' posters; many opportunities exist to provide informal feedback; and both

the President and the Provost operate open-door policies. Students confirmed that their views are welcomed and their concerns taken seriously.

110 Faculty Senate and the Provost's Council are further means of facilitating feedback on a wide variety of matters, and involve candid exchanges. Employers' views are heard largely in the course of placements, which are managed by the Internship Office. Alumni/ae contact is established by graduate information forms, though the University recognises that scope exists to strengthen its alumni/ae relations for reasons of curriculum development, employability and income generation.

Students are advised about, and inducted into, their study programmes in an effective way and account is taken of different students' needs

111 Most students are international, and the University prioritises the quality of information and advice with which it provides them. The scrutiny team noted the online availability of extensive and relevant pre-arrival information, and the similarly helpful Welcome Pack, which includes both contextual and institutional information. A Student Charter is in place; a mandatory first year seminar discusses the challenges of London life and UK higher education; the General Education programme offers courses in academic literacy and mathematics, tailored to meet individual diagnosed needs; and peer mentoring and tutoring are available from senior students of good academic standing.

112 Students with declared disabilities are identified at application, and others are encouraged to make a declaration at any future point; both faculty and other staff have been made aware of the adjustments available for students with visual or auditory impairment or dyslexia, and a student told the scrutiny panel about the proactive and personal support received for attention deficit and dysgraphia. Standard and reasonable adjustments to assessment arrangements are in place for students with particular learning needs.

Available learning support materials are adequate to support students in the achievement of the stated purposes of their study programmes

113 The University faces challenges in its material infrastructure, acknowledging that while its two campuses are appropriate for higher education study both have suffered from under-investment under previous management and would benefit from planned enhancements. A regular space utilisation review is in place; timetabling software has been acquired; and a rolling maintenance programme is in place; but areas of continuing concern to students include wireless provision; supporting the virtual learning environment (faculty usage of which is variable); information technology more generally; and the condition of some halls of residence. Meeting these expectations remains a challenge requiring robust recruitment and a diversification of funding sources.

114 Students are made aware of the availability of outstanding library resources in London, and, while some students have been critical of library stocks, particularly on the Kensington campus, the University has a strategic commitment to make increasing use of electronic resources: an e-librarian service can be accessed remotely, and information literacy is included in a mandatory Principles of Academic Research course. Faculty are regularly appraised of updates to resources and the service usage is monitored and feedback canvassed.

The effectiveness of any student and staff advisory counselling services is monitored and any resource needs arising are considered

115 For personal support two counsellors are available for students, under the auspices of Student Affairs, to which they report on generic issues. Faculty academic support is largely provided by the Centre for Learning and Teaching; Faculty Senate is a forum for raising

non-confidential issues, and a similar forum for other staff is conducted annually. These services are monitored by the Academic Board in its scrutiny of operating plans.

116 The importance of academic advising derives from the range and complexity of available course choices and serves as a means of helping the University achieve its aim of 'knowing its students'. Students who met the scrutiny team were complimentary about the time advisers spent with them and the quality of their support. The Faculty Guide to Academic Advising is a comprehensive document covering technical procedures and calendars, ranging from deadlines to 'drop' courses to data protection, and advising on procedures when students ignore advice.

117 Nonetheless, for reasons described in a detailed working party report in 2013, the academic advisory system remains problematic. The report stressed that students required consistency and accuracy of advice, faculty wanted more information, and central service wanted a robust service, for example telling students they did not have the requirements to graduate. Among the recommendations, not all of which have been implemented, was that advisers be formally evaluated, as for teaching. In an observation the effectiveness of academic advising was called into question, with examples cited of some students' graduation being affected by inadequacies in the degree planner system underpinning their programme construction. The Provost acknowledged that establishing the new academic support advisor role, designed to induct students on how to use the system and update guidance had proved more complex than anticipated; and in spite of the Academic Plan (designed to steer students through course decision making) having been integrated into the online information system, the scrutiny team found evidence of students reporting confusion between advisers and the Registry, and the necessity of double and triple-checking of graduation requirements.

118 In pursuing this matter the scrutiny team was told by senior executives that priorities for the reclaimed validation fee in the event of taught degree awarding powers being granted would be staffing in the Department of Academic Affairs and Academic Quality, the Registry and the advising operation (see also paragraph 38). The £150,000 currently involved does not, to put it at its lowest, appear to the scrutiny team to be excessive given the needs in evidence, and it may be that supplementation will be required.

Administrative support systems are able to monitor student progression and performance accurately, and provide timely and accurate information to satisfy academic and non-academic management information needs

119 The University's administrative support systems monitor student performance and generate institutional performance data. Its live information system, structured around the student lifecycle, contributes to annual monitoring, enables documents such as attendance certificates to be provided on demand, and, as the repository for grades, provides graduating students with a full transcript and diploma supplement to accompany their Open University degree certificate. The Department of Student Affairs maintains records of an appropriate range of non-academic matters.

120 The Digest is a dataset which can be used for individual module evaluation through to management and governance overviews and is therefore critical to annual monitoring. It also informs institutional objective setting, delivery monitoring and a dashboard, which quantifies institutional performance and is used by the Board of Trustees and senior University committees in overseeing institutional performance and identifying areas of concern.

Effective and confidential mechanisms are in place to deal with all complaints regarding academic and non-academic matters

121 The Student Charter enunciates, as a principle underlying the Academic Appeals Policy, that students must have the opportunity to raise matters of concern without the risk of

disadvantage. Appeals are dealt with by the Academic Appeals Committee, which also collates the information necessary for annual monitoring.

122 Informal complaints, which are also collated but usually resolved by reconciliation meetings, inform relevant services and strategies; students understood both the system and how to access support from the Student Government. Staff complaints are dealt with through a well-established grievance procedure, and the scrutiny team endorses the finding of the QAA institutional review that the University has effective policies for appeals and complaints.

Staff involved with supporting the delivery of the organisation's higher education provision are given adequate opportunities for professional development

123 Professional staff are afforded the same training opportunities as faculty, being supported to attend conferences, courses and other opportunities for professional development, and those who met the scrutiny team gave examples of such opportunities, which ranged from seminars on student loans and retention to a doctoral programme in student engagement.

Information that the organisation produces concerning its higher education provision is accurate and complete

124 The University's website, the main source of information about provision, is managed jointly by Marketing and Recruitment, Student Affairs and the Registry; the division of responsibility is clear and understood. The scrutiny team found the website easy to navigate and informative.

125 As previously noted (see paragraph 118), the lack of authoritative advice to students on matters such as curriculum changes, course wait lists and course withdrawals has caused difficulties. Overall, however, students who met the scrutiny team found syllabi clear and thorough, and knew where to find information such as external examiner reports.

Equality of opportunity is sought and achieved in the organisation's activities

126 The University's Strategic Plan lists inclusiveness and diversity as shared values. The Admissions Policy has transparent criteria and an appeal procedure; arrangements for students with disabilities are previously described (see paragraph 112) and are satisfactory. Equal opportunities for staff are fully explained in the Employment Handbook: all protected characteristics are included and a grievance procedure is in place.

127 The Quality Manual references external reference points for equality and diversity: these include the Quality Code and the Single Equality Scheme. While it states that all committees have equality and diversity as standard items, in practice this is not so; but while the scrutiny team found little evidence of consistent institutional monitoring at achievement by different student categories, this sits alongside a genuine commitment to improve the student experience for all, reflecting the likelihood that the institutional commitment to equality of opportunity is simply taken for granted.

Annex: Update to final report, February 2018

Introduction

1 Richmond, The American International University in London (the University; Richmond) made an application for taught degree awarding powers (TDAP) that was considered by QAA's Advisory Committee on Degree Awarding Powers (ACDAP; the Committee) in November 2014. The Committee agreed to proceed to the detailed scrutiny of the application. The final report on the detailed scrutiny (the final report) was considered by ACDAP in May 2016.

2 The Committee commented that:

- there were concerns about Richmond's financial vulnerability, notwithstanding the fact that modest surpluses having been maintained for the last four years, most recently £200,000 against a £21.6 million annual turnover in 2014-15
- while the £2m financial reserve and reliance on charitable giving via the Richmond Foundation could mitigate risks to financial stability in the short term, these are not a basis for supporting required investments for the medium to long term
- a disjuncture appears to exist between Richmond's current financial policy and funding levels, and the safeguarding of quality and standards of its higher education provision, illustrated by:
 - i an underinvestment in administrative support departments, including the Department of Academic Affairs and Quality Assurance, which is charged with dealing with the complex responsibilities associated with a dual accreditation system
 - ii a plan for investment of the £150,000 saving from validation fees in the Department of Academic Affairs and Quality Assurance, the Registry and the advising operation, contingent on the grant of TDAP, appears inadequate to support the additional responsibilities conferred by the award of TDAP
 - iii continuing problems with the timeliness and reliability of advice for some students, offered through the academic advisory system, which has suffered from underinvestment in both human and technical resources
 - iv some learning resources below the standard that students can reasonably expect, including an overdue further upgrade to electronic resources
- a full academic cycle is necessary to gather evidence that demonstrates the effectiveness of the recently established Academic Board and Curriculum Development Committee
- there was a need for further development to create a unified, effective and rigorous system for quality assurance, and for Richmond to take continuing external advice from individuals with extensive experience of working in other UK higher education institutions
- there was a need for continued steps to be taken to bring Richmond's own programmes into full alignment with UK expectations.

3 ACDAP's consideration of the final report led to the decision to place the application into abeyance for a maximum period of two years.

4 Following a formal request from the University, ACDAP agreed in May 2017 that the detailed scrutiny of the application could be re-activated.

5 The University submitted its update and supporting evidence. Members of the original scrutiny team, Professor Susan Blake and Professor David Timms, together with Professor Diane Meehan (who replaced Ms Kathryn Southworth), were appointed as assessors to undertake the detailed scrutiny. The original scrutiny secretary, Ms Carole Reid, was replaced by Mrs Jennifer Taylor. The re-activated scrutiny was coordinated on behalf of QAA by Mr Alan Hunt, replacing Professor Robert Harris, who had retired.

6 The scrutiny team agreed a programme and visited the University on 26 to 27 September 2017 to meet senior managers and other representatives of the University. Members of the team also observed several meetings at the University.

Structure of this report

7 This report addresses the updated evidence for each of the issues raised by ACDAP in its consideration of the final report in May 2016.

Financial vulnerability

8 The final report included several positive findings in relation to financial management at the University, including the exercise of budgetary control, the soundness of financial management, and a capacity for speedy and judicious decision making when necessary. In general terms, the team found that the University's planning and resource policy was coherent and supportive of institutional objectives.

9 Within this context, ACDAP's concerns in relation to financial vulnerability relate primarily to the final report's observation that the level of institutional dependence on student fee income was risky and a potential impediment to longer-term strategic planning. The University acknowledged its dependence on fees, and accepted that it was operating on a basis that budgets could not be finalised until student numbers were known. As money for investment is allocated as part of annual budgeting, this interrelates with the following section on the basis for investments (paragraphs 19-26).

10 In this re-activated scrutiny, the scrutiny team has taken a high-level overview of the financial position as shown in the University's budgets and accounts. At the time of the final report in 2016, the last available set of annual accounts for the University were those for 2014-15, which showed a surplus of £200,000 resulting from an annual turnover of £21.6 million. The budget for 2015-16 anticipated a surplus of £250,000, but the final accounts showed a loss of £848,000. Following this, in 2016-17 the final accounts for the University showed a surplus of £839,000. For 2017-18, the initial budget predicted a surplus of £340,000, but the management accounts for the first quarter showed a projected deficit of £348,000, although the Director of Finance and Planning expressed confidence that the final out-turn for the current year will be close to break even. A reforecast will be done early in 2018 to consider the January intake of students, and students at Italian study centres. The trustees, and the new Chair of the Board of Trustees, are committed to getting close to break even, while making necessary investments. The detailed budget for 2018-19 will be prepared early in 2018, and an out-turn of about £230,000 is likely to be budgeted, with appropriate investment incorporated. A similar out-turn for the following year is likely to be budgeted, although figures will be partly dependent on whether TDAP is awarded.

11 In both 2015-16 and the first part of 2017-18 the loss of income was largely due to under-recruitment of students, illustrating the vulnerability of the University in this area. However, the outcome for 2016-17, and the steps being taken in the current financial year, show an ability to respond constructively to recruitment difficulties. The University has considered the reasons for under-recruitment, and takes steps to address them. Past under-recruitment of students from the United States arose partly from specific human

resources issues in the Boston office, which have been resolved; there was at one point a problem with control of the marketing budget, which has been addressed. Problems in the current year relate primarily to the under-recruitment of UK undergraduates in a volatile market that was tougher than expected and difficult to predict. The trustees accept there are challenges in recruitment, but believe that appropriate steps are being taken to address them.

12 To attract students, the University is reviewing and developing the portfolio of programmes offered, appreciating the need to differentiate its offer. Two degrees have been discontinued and are being taught out, and some innovative new master's programmes are being put in place, including an MA Luxury Brand Management. The courses (modules) provided by Richmond's Italian study centres have been credit-mapped (aligned with UK/EU credit and FHEQ levels) and have been approved by The Open University (The OU) so that they can form part of an award, and it is anticipated this will increase student numbers. Additional sources of income are being considered, including a wider range of summer activities, and increasing the letting income from student accommodation. The University is also considering working with partners, for example to provide English language courses. It believes that investment is improving retention.

13 To strengthen the approach to meeting student number targets, a new Director of Marketing, Recruitment and Admissions has been recruited. He has worked with colleagues to draw up a new Marketing and Recruitment Strategy and action plan, which has been approved by the Finance Committee and the Board of Trustees, and is being implemented. This Strategy provides for a more rigorous, detailed and updated approach, including the development of the website, increased use of social media, and more focus on the specific steps needed to move from an expression of interest to registration of a student. There is more emphasis on gathering data, with weekly reviews, and updated and revised scorecards on data relating to admissions will be brought to each Board of Trustees meeting. A Marketing Officer with a focus on digital marketing has also been recruited. The team heard that, in practice, recruitment efforts are focusing carefully on what works and on building relationships, with better monitoring of interactions with individual students and evaluation of data in relation to clearer targets and priorities.

14 In terms of wider financial control, a new Director of Finance and Planning, who has experience in another higher education institution, took up her post in summer 2017, and is developing existing financial processes to make them more effective and transparent, including regular meetings with budget holders and more controls. The University is in the process of finalising negotiations for an integrated facilities management contract to a single provider. The purpose of outsourcing its facilities management is to gain value in terms of level of services provided and financially, with anticipated overall savings of 10-20 per cent. Some savings have also been achieved through a review of costs at the Italian study centres, and the provision of IT services has been restructured. To provide additional support, a Financial Accountant has been recruited, and a Management Accountant is being recruited. Consideration is also being given to setting up an internal audit function. A proposal to acquire new finance software is being developed; this will include providing dashboards showing financial data. The Chair of the Finance Committee accepted that there were financial challenges, and that resources must be used sensibly, but said that the Finance Committee had developed more focused financial awareness.

15 The University sees some reliance on charitable donations as an appropriate part of its funding. To comply with accounting rules, donations to the University must be entered as income in the year in which they are received. Significant donations are normally put into the Richmond Foundation, which is allied to the University but has separate accounts, and the University can apply for funds from the Foundation, making a case in writing for a specific purpose. The use of funds for investment is dealt with later in this report (see paragraphs 19-26). Increased financial resilience has been provided by the setting up of a loan facility of up

to \$3.5 million with JP Morgan, but the Director of Finance and Planning does not anticipate a need to call on this for the foreseeable future.

16 At strategic level, there has been an appetite for ambitious targets; however, the team heard that there will be more focus on setting and achieving realistic targets in the future, with the maximum number of students expected to be closer to 1,500 than 2,000. As the UK undergraduate market is very competitive, there are plans to recruit more international and postgraduate students. The University notes that achieving TDAP would be relevant to student numbers in terms of international reputation, and supporting access to student loans. Future budgeting will be more prudent, but an overall five per cent surplus to provide for investment remains a goal.

17 The University notes that HEFCE reported a satisfactory outcome to its Financial Sustainability Management and Governance (FSMG) check of the institution. While this is indeed positive evidence, it is not itself an indication that an institution will necessarily meet the TDAP criteria, and should be considered in a fuller context. The purpose of the FSMG check is to provide students with reasonable confidence that they should not be at risk of being unable to complete their course because of the financial failure of their education provider, whereas the TDAP criteria look more widely at financial management and resource allocation processes.

18 Overall, budgets and accounts for recent years (to date) demonstrate that the University is subject to financial vulnerability, primarily in relation to under-recruitment of students. It has significantly under-recruited in more than one year. However, there is also evidence that the University can respond positively to under-recruitment. The appointment of the new Director of Finance and Planning is part of a move towards greater efficiency in financial management, and the appointment of a new Director of Marketing, Recruitment and Admissions, together with the approval of a new Marketing and Recruitment Strategy, demonstrates increased focus and rigour in relation to meeting recruitment targets. However, these are relatively recent developments and their full effectiveness remains to be seen. It is still the case, as noted in the final report, that the institution will continue to operate on a tight budget in an unpredictable external environment. However, developments in financial, marketing and recruitment management have strengthened its chances of succeeding.

Basis for required investments in the medium to long term

19 The final report included reservations about the ability of the University to make appropriate investments in the student experience, quality and standards where investment was dependent on annual surpluses, and there was a limited cushion for contingencies, with the trustees accepting that finance could be 'hand to mouth'. There was a lack of a clearly articulated, forward-looking, costed investment strategy, and progress with investment had been slower than was desirable. The University acknowledged that increasing investment would be a major challenge, with the trustees accepting that there was a need to move to a more fully sustainable model. ACDAP expressed concerns that financial reserves and reliance on charitable giving might not provide a basis for supporting required investments for the medium to long term.

20 The University has continued to make investments in many areas, including academic quality and student services staffing, IT infrastructure, student accommodation, the library and the psychology laboratory. While academic staffing has generally been maintained at existing levels, strategic investment in staff has been made to support new programmes, such as a professor for the new MA in Luxury Brand Management.

21 During meetings and observations, the scrutiny team heard examples of areas where investment needs had been identified and were being scoped and costed. Approval was given for expenditure of an additional £200,000 above the marketing budget of £300,000 in relation to the Marketing and Recruitment Strategy. In addition, consideration is being given to the need for

new finance software, at a potential cost of about £200,000, and for new student records software (costs still to be assessed). The team also heard that there will be a need for spending on website development and refurbishment of student accommodation. Where there are costs associated with new or revalidated courses, budget holders are expected to include these in their budget plans.

22 Regarding taking a more systematic approach to investment planning, the new Director of Finance and Planning is seeking to ensure that currently anticipated needs are scoped and costed in areas where investment or modernisation are required. She has initiated moves to formalise investment planning, looking to a five-year timeframe. As she is responsible for IT as well as finance she can oversee the majority of current projects. The intention is that once projects have been costed they will be built into annual budgets over coming years, with the finance software purchased in 2018-19 and the student records software in the following year. Development of the University's website has been scoped, with completion of the three-phase project anticipated in early in 2018, at an estimated cost of £20,000. Money will also need to be spent on updating and maintaining student accommodation. Plans for non-renewal of some student accommodation when the leases expire are subject to further discussion pending review of opportunities for commercial student housing being rented on an annual basis in the light of student demand.

23 In the final report, the team noted that the resource allocation model was based on budget holders submitting annual operating plans and budgets to the Planning and Resources Committee. This Committee considered financial and resource needs in the context of institutional priorities to make best use of available resources, with plans being finally approved by the Board of Trustees. The Director of Finance and Planning is tightening this approach so that from now on investment planning will be done explicitly alongside budgeting, with each budget holder being asked to complete a spreadsheet showing all income, expenditure and investment needs for three financial years at a time, and operating budgets for the following year, keeping a five-year timeframe in mind.

24 Regarding the provision of funds for investment where this might not be covered by student fees, the accounts for 2014-15 showed relatively modest University reserves of over £2 million. The accounts for 2016-17 now show University reserves of just over £3.3 million. In addition, there has been a donation of £10 million from the Sir Cyril Taylor Foundation Trust (Sir Cyril is the founder of the University and a non-voting member of the Board of Trustees), of which £575,000 was included in the 2016-17 budget, and £425,000 in the present-year budget to fund improvements in IT and other areas. The remainder is invested, with the income going to the University, and capital can be drawn down if a case is made for a specific investment need. The University can also request sums for investment from the Richmond Foundation. Overall, a sum in the region of £15 million could be called upon for investment if needed, although the intention is that most of this, which comes from the Sir Cyril Taylor Foundation Trust donation, should be retained as an investment, with only the annual dividend income being used by the University.

25 Total forecast donation income for the University in 2017-18 is entered in the management accounts as being £2,635,000 but each large donation is tied to specific investments, and the greater part of this money comes from the Richmond Foundation and the Sir Cyril Taylor Foundation Trust donation. Requests for money from these sources should be for specific investment purposes; in the current year, the donations from the Foundation and other sources include £500,000 (largely to fund marketing and recruitment projects), £200,000 to fund some refurbishment of student accommodation, £100,000 for IT cabling works, and £200,000 for other specific projects. There are plans to target potential benefactors and alumni to increase donations.

26 The current Strategic Plan comes to an end in 2019, and the Director of Finance and Planning foresees a more rigorous approach to financial underpinning when the next Plan is drafted. She is preparing a four-year forecast, in line with figures already provided to HEFCE, and will then start work on the new five-year Strategic Plan. In the past, there has been a general aspiration to achieve surpluses of up to five per cent, with a view to investing three per cent per year, but she is looking to refine this goal, working on the basis of realistic student numbers.

27 Overall, the team considers that the University's approach to financial planning and resource allocation is becoming more robust, particularly in relation to identifying and costing investment needs. There is an institutional commitment to investment to provide a good educational experience for students. While it remains the case that investment depends on the scope available within annual budgets, addressing recruitment issues as outlined above should help to stabilise income. Current investment plans are likely to depend to a significant extent on charitable donations supplementing income, a situation not uncommon in institutions based in North America. Donations are both restricted and unrestricted, with restricted donations released from the Richmond Foundation where a clear case is made in a specific proposal; the use of funds may be subject to conditions. The sum now potentially available provides a cushion for currently planned investments, so that investment will not necessarily be delayed if there is under-recruitment. There are still many areas needing some investment, and there is not yet a comprehensive investment plan in place, but this is being developed.

An apparent disjuncture between current financial policy and funding levels and the safeguarding of quality and standards.

Underinvestment in administrative support departments and the adequacy of the proposed investment

28 The final report noted the University's acknowledgement that additional staffing, both for the Department of Academic Affairs and Quality Assurance and for the Department of Registry Services (the Registry), was a necessity to meet the responsibilities accruing from the possible future exercise of TDAP. The final report also noted the University's proposal that this requirement would be met by reallocating the current OU validation fee of £150,000, and questions the adequacy of this investment. Following its scrutiny of the final report, ACDAP raised concerns about underinvestment in administrative support departments, especially in the Department of Academic Affairs and Quality Assurance. It considered that the planned future investment of the current validation fee (£150,000) paid to The OU would not fully meet the needs of an institution with degree awarding powers, nor the apparent inadequacies, both technical and human, around student advice, nor the below-standard learning resources, especially electronic resources.

29 In its response to ACDAP's concerns regarding underinvestment in administrative support departments the University stated that it has been awarding United States degrees for over 30 years and dual-accredited degrees (United States and UK) for over 20 years, and that it already has the key mechanisms in place with this additional money providing enhancement of existing practice. It also stated that it has acted over the past year to demonstrate its commitment to developing support in this area, rather than waiting for the funds to be released by the ending of the OU partnership, and that the £150,000 validation fee would be in addition to the investment already made in staffing in 2016-17, made possible through the donation received from the Sir Cyril Taylor Foundation Trust (paragraphs 24-25 and 27). The University contends that gaining TDAP will reduce some of the administrative burden of having OU accreditation, and will allow for the streamlining of processes and the more efficient deployment of resources. Areas that the University will take over from the OU, and which it says will remove an extra layer of administration, include taking full responsibility for external examining arrangements, assessment boards and programme approval and review. However, the team

considers that demands on administration are unlikely to be reduced overall if the full rigour of academic oversight is to be maintained, for example in relation to such matters as external examiner appointments and full responsibility for validation. The University has in place a TDAP Transition Plan, which was noted in the final report as 'detailed and competent'.

30 The University utilised an external consultant to advise on optimising resources and enhancing delivery in student advice, Registry services and quality assurance. One outcome was the approval of two additional full-time posts in the Department of Academic Affairs and Quality Assurance, with two new Quality Assurance Officers starting at the University in May 2017 - although at the time of the reactivated scrutiny only one of these staff was still in post, the second post-holder having failed to meet the requirements of the University's probationary period. Registry Services has also been reorganised, with a Head of Registry Services replacing the former Academic Registrar in June 2016 and a new role of Examinations Officer created and filled in May 2017. These three new posts involved an investment of around £120,000.

31 The Quality Assurance Officers report to the Dean of Quality Assurance and work within the Department of Academic Affairs and Quality Assurance. Quality Assurance Officers have responsibility for 'the coordination of effective quality assurance processes as set out in the Quality Manual and University Regulations'. Key duties include managing programme validation and revalidations, providing support and advice to programme teams on annual monitoring and programme review, overseeing the reporting of curricular changes, conditions and recommendations arising out of validations and revalidations and liaising with validating partners on course and programme changes, and maintaining definitive course and programme documentation. The role descriptor also states that Quality Assurance Officers will 'service key University committees and working parties' including Curriculum Development Committee (CDC). The Quality Assurance Officer currently in post, as well as supporting CDC, is also temporarily supporting the Academic Appeals Committee in the absence of the second Quality Assurance Officer. The vacant, second Quality Assurance Officer post has been re-advertised, with interviews scheduled for 12 January.

32 The Examinations Officer reports to the Head of Registry Services and works within the Registry Services team. This role brings together many responsibilities previously spread across several staff members and involves responsibility for the complete assessment cycle, including preparation of examination timetables, ensuring examination papers are available for all examinations and that suitable invigilation arrangements are in place. The Examinations Officer has taken overall responsibility for external examiners. This Officer also works with Student Affairs to ensure that there are appropriate arrangements for students with special educational needs, and is also involved with OU student registrations and examination boards.

33 The University has demonstrated its commitment to investing in support for key quality assurance and administrative functions ahead of the possible award of TDAP and beyond the initial proposal for reinvestment of the OU validation fee. Although it is premature to assess the impact of these additional roles, the new post-holders clearly bring experience and add capacity, and academic staff confirmed the helpful support provided through the Quality Assurance Officer role. However, the team also notes that some issues remain around quality assurance; see paragraphs 54-58.

Academic advising

34 The final report noted the importance of academic advising for students, due to 'the range and complexity of available course choices', and that the system serves as a means of helping the University achieve its aim of 'knowing its students'. While the report noted that students who met the scrutiny team were complimentary about their experience of academic advising it also raised issues in relation to the consistency and accuracy of the advice given to students, reflecting the outcomes of a 2013 internal University working party and subsequent

report. The adequacy of the technical systems supporting the University's academic advising system were also brought into question.

35 In its consideration of the final report, ACDAP raised concerns about the timeliness and reliability of advice for some students offered through the academic advisory system, which had suffered from underinvestment in both human and technical resources. In its response, the University commented that it was prioritising staffing in the advising area and that ACDAP's concerns had been addressed. Since the final report was submitted, the University's academic advising system has undergone several revisions and continues to be kept under review (see also paragraphs 39-40).

36 To summarise developments in this area since the original scrutiny ended, in autumn (fall) 2015 the faculty-based advising system was replaced by a hybrid support model of professional advising in the first two semesters of the degree, with subject-specialist faculty advisers allocated to students in years 2 to 4. The advising process was supported by the appointment of a new Academic Advice and Support Coordinator in the department of Student Affairs, located in the Student Hub. This Coordinator advised students on how to select, register, and add or drop courses, but did not act as an adviser to individual students on the appropriate choice of courses. When the post-holder left the University in December 2015 a replacement was appointed temporarily for six months, before being made permanent from summer 2016 onwards. The final report noted the Provost's acknowledgment that establishing the new academic support adviser role had proved more complex than anticipated. Following a subsequent review, the role of Academic Advice and Support Coordinator was reassigned to Registry Services in July 2016 and re-titled Coordinator of Academic Advising. The University noted that the revised role and line management structure were designed to 'reflect the integration of advising with transfer credit evaluation, registration, and graduation audits', all of which are the responsibility of Registry Services. As part of the revised role the Coordinator was assigned as the academic adviser to students in their first two semesters. However, the post-holder left the University in summer 2017.

37 More recently, further adjustments were made to the Coordinator of Academic Advising role after the 2016-17 academic year, when the workload was deemed to be 'unsustainable'. The revised model retains the principle of a hybrid approach whereby the student is advised by staff who are not subject specialists (such as the Coordinator and staff in the School of Liberal Arts) in the first two semesters and are subsequently assigned faculty-based specialist advisers. In its response to ACDAP's concerns about the academic advising system, the University noted that this further refinement was linked to an enhanced student retention strategy and that the current investment in, and adjustment to, the system is having positive results.

38 Students who met the team noted general satisfaction with the academic advising system but considered that a Coordinator of Academic Advising was needed because some faculty academic advisers do not fully understand the Registry system (whereas the Coordinator helps students to understand the system and perform tasks such as how to register for classes). Students also confirmed that all students have an academic plan on the student portal that outlines what classes they need to take, although they commented that this was not always fully accurate and up to date. Both staff and students commented positively on the role of the peer tutors/mentors in supporting students, for example in helping them to understand their academic plans. These plans, as noted in the final report are designed to steer students through course decision-making and are integrated into the online information system. In meetings with staff, the team heard that improvements had been made to the supporting information system, that the updating of academic plans was now more systematic, that faculty understanding of Registry systems had improved, and mandatory training for relevant faculty and staff had been put in place. An updated 'Faculty Guide to Academic Advising' is available and, as noted in the final report, this is a comprehensive document; it is accompanied by the 'Student Guide to Academic Advising', which is updated regularly at the same time.

39 A new post-holder took up the revised role of Coordinator of Academic Advising in October 2017. A detailed 'advising plan' was put in place to cover the period between the previous Coordinator leaving the University and the new Coordinator taking up post, which ensured that students received appropriate advice during orientation and registration. Due to the recent nature of the appointment, it is too early to assess impact. However, the University continues to keep the academic advising system under review. Feedback from students is sought by Student Affairs following orientation, and staff confirmed that the most recent survey returned a 70 per cent good/excellent rating for academic advising. The team noted that in relation to Academic Support, the University's overall NSS score was 75.08 per cent; however, there is considerable variation in scores for this area across the three undergraduate programmes involved, specifically 58.87, 78.79 and 91.67 per cent. In meetings with the team the University commented that the final-year students who completed the NSS during 2016-17 would have benefited less from the changes made to the system than those in the earlier stages of their programmes.

40 The University has also set up a limited-life Working Group on Academic Advising, chaired by the Vice-Provost Academic Affairs, which includes academic and administrative staff and student representation. The remit of the Group is to assess the University's hybrid advising model, produce a report and offer recommendations on any areas of enhancement. The Group is expected to report to the Academic Board by the end of 2017-18; at the time of the reactivated scrutiny the group had held one meeting, with further meetings scheduled for 2018.

41 A second element of academic advising raised as a concern both in the final report and by ACDAP was the student record system in relation to the technical aspects of advising, particularly as the means of checking when students are missing some necessary element in their profile for graduation is reliant on manual intervention. The University's revised and updated Strategic Plan 2014-19 states as a strategic objective its intention to select and implement a new student records system by 2020. The commissioning of this project, with an associated budget yet to be agreed, was confirmed in meetings with the team.

42 The University continues to invest in, and review, its academic advising system and to address student concerns. Students who met the team, while generally satisfied with the advising system and supportive of the hybrid approach, raised some of the same technical issues originally noted in the final report, such as missing elements in their academic plans. Nevertheless, the team considers that the University's commitment to purchase a new student record system is a positive step forward in addressing these technical issues.

Learning resources

43 The final report considered that the University faced challenges in its material infrastructure, all of which would benefit from planned enhancements. It noted that 'areas of continuing concern to students include wireless provision, supporting the virtual learning environment (faculty usage of which is variable), information technology more generally, and the condition of some halls of residence'. It concluded that 'meeting these expectations remains a challenge requiring robust recruitment and a diversification of funding sources'. In its discussion of the final report ACDAP raised the concern that some learning resources are below the standard that students can reasonably expect, including an overdue further upgrade to electronic resources.

44 In its response to ACDAP's concerns the University stated that, as part of the continuing development of its infrastructure 'over the past twelve months' it had invested in improvements to its wireless and network infrastructure to 'ensure it provides a firm foundation on which to build and improve the student learning experience'. These improvements have been made possible through investments made by the University and the Sir Cyril Taylor Foundation Trust donation. They include £300,000 for a new wireless network across both campuses and

halls of residences; a move to Office 365 in June 2016 for students, faculty, and staff, with the addition of further collaboration tools from the Office 365 suite planned; refreshing of the server infrastructure in summer 2017; and a new library catalogue system implemented in summer 2017 together with investment in additional online library resources. A separate donation of £200,000 has been received by the University this year linked specifically to the refurbishment of student accommodation, along with £100,000 for improvements to IT, and a further £300,000 has been committed for July 2018.

45 Further, to support British Psychological Society recognition of the psychology degree in 2017, the University invested around £240,000 in a new Psychology Laboratory. Two 'resource-heavy' undergraduate degrees with small enrolments have also been discontinued and are being taught out, and the associated savings will be reinvested into schools and support areas. More generally, where resources are required as part of programme development or revalidation these would be included in the relevant budget holder's operating plan.

46 Students who met the team confirmed that both general and specialist resources were adequate for their needs and spoke particularly positively about the support received from library staff. Feedback from the NSS was less positive, with the overall score for learning resources for the University being 68.93 per cent. In meetings with the team the University commented that final-year students who completed the NSS during 2016-17 would not have benefited from the upgrades to learning resources. The University has set up an NSS working group to analyse and address the outcomes of the 2017 survey; areas of focus for the group are Student Government, Learning Resources and Student Support. At the time of the reactivated scrutiny the group had met on two occasions.

47 As previously noted, since ACDAP's consideration of the final report, the University has demonstrated its commitment to investing in learning resources to support the student learning experience, particularly in relation to IT, to ensure that these are of an appropriate standard. Further investments are planned. Much of the investment has been made possible through the Sir Cyril Taylor Foundation Trust donation and further discrete donations assigned to specific items. As noted elsewhere in the report (paragraph 27) the team considers that the University's approach to financial planning and resource allocation is becoming more robust and there is a clear link to achievement of the University's strategic objectives.

Effectiveness of the recently established Academic Board and Curriculum Development Committee

48 The Academic Board and the Curriculum Development Committee (CDC) were established while the initial scrutiny was ongoing, to replace a 'Learning and Teaching Policy Committee' overburdened with both detailed scrutiny of new course proposals and regulatory and oversight functions. Responsibilities for new courses and curricular changes were taken over by the CDC, and the formulation of policy and oversight by the Academic Board. The initial scrutiny team observed two meetings of the newly established Academic Board, and one of the CDC. The Academic Board was found to function well and its outcomes to be appropriate and responsible, even if, on occasion, somewhat informal in operation. The CDC was still 'finding its feet' in that many defects were noted in the single meeting observed, including a late start, early non-quoracy, non-attendance by the former secretary without explanation, and apparent misunderstanding of key proposals on the part of some members. Nonetheless, the initial scrutiny team took the view that the new establishment 'potentially enhances institutional quality management'.

49 The reactivated scrutiny was supplied with all papers of the Academic Board for 2016-17, and was able to observe two meetings in 2017-18, one of them concerned solely with annual monitoring, a meeting that corresponded in content to a meeting observed during the

original scrutiny, in 2015. The papers and minutes of the CDC for 2016-17 are included in the Academic Board papers. The reactivated scrutiny included one observation of the CDC, a meeting which lasted only 10 minutes. The Chair stated that such a short meeting was unusual, and this was confirmed by the Academic Board papers. Of the 10 sets of Academic Board papers from 2016-17 provided, all but three included a considerable number from the CDC: for example, of the 668 pages of the papers of the November 2016 Academic Board meeting, 438 pages were from the CDC, and this was not untypical.

50 Although the CDC observed provided a rather insubstantial basis for definitive judgement, the scrutiny team found that the committee is now functioning effectively. An administrator dedicated to quality assurance activities manages the papers and takes the minutes. The meeting was quorate at the outset and started on time. Members appeared to be well informed about the content of the papers, and discussion was focused.

51 The initial scrutiny voiced no reservations about the functioning of the new Academic Board, and no concerns were identified by the reactivated scrutiny team based on the new evidence. The team considers that the original objective, to reduce the 'operational' responsibilities of the preceding 'Learning and Teaching Policy Committee', was unlikely to be fully realised under the current arrangement, where the Board receives every paper already considered by its subcommittee. The University's own Academic Committee took the view, based on Academic Board minutes, that the Board was still more 'operational' than policy-focused, an opinion supported by the team. Overall, however, the scrutiny team concludes that the new evidence demonstrates a reasonable level of effectiveness on the part of the Academic Board and CDC established near the conclusion of the original scrutiny in 2015.

Further development to create a unified, effective and rigorous system for quality assurance and for Richmond to take continuing external advice in this area

52 The final report from the initial scrutiny suggested that while comprehensive policies for quality assurance were in place, and specified in a Quality Manual, practice did not always match the specified procedure. In a minority of cases, procedures for non-validated programmes had not been completely followed, and, again in some cases only, insufficient evidence of meeting conditions imposed at validation was provided to relevant committees. The original scrutiny team considered that it was important for the University to continue to take external advice, to enable it to meet external expectations and sector norms over time. The team considered that the Academic Committee would be strengthened by the appointment of more external members with current experience of higher education teaching management.

53 In a general sense, Richmond's system of quality assurance has benefitted from the experience of following OU requirements in such matters as the use of external examiners, dealing with external examiner reports, validation, and routine monitoring of programmes. The comprehensive Quality Manual, which was praised in the report of the first stage of the scrutiny as 'comprehensive and clear', has continued to be updated regularly. Richmond has adopted procedures aligned with The OU's (and therefore with those of UK higher education at large) by appointing external examiners for its own, non-OU programmes, and conducting annual monitoring of these programmes alongside those required by The OU. This extends across all programmes leading to named awards, whether OU-validated or not, and includes the 'Liberal Arts' offerings, which, not strictly being 'programmes', could have been neglected.

54 In Richmond-validated programmes, the opportunity has been taken to amend OU models to meet Richmond needs more exactly. For example, the template for external examiner reports is fuller than the one required by the OU, and was praised by experienced non-staff members of the Trustees' Academic Committee for its comprehensive coverage. In its document supporting the reactivation, the University states that it has also 'trialled and refined' 'independent validation and formal programme review processes', and that these 'will be both

simpler to administer and more effective as a result of serving just the Richmond degree requirements'. However, the team considers that validation is not operated for Richmond's independent courses with the rigour observable in the 2016-17 OU revalidations (paragraphs 57-59).

55 In 2016-17, three validation events were held for master's programmes in International Business Law, Luxury Brand Management, and International Sports Management. Four master's programmes were revalidated in two combined revalidation events: International Development/International Relations; Art History and Visual Culture/Visual Arts Management and Curating. In the same year, seven undergraduate OU courses were revalidated, at four events. The OU panels all consisted of four members, of whom three were external. One of the Richmond panels included four members; the others had three, although all members other than the chair were external. Richmond's Quality Manual states that there should be 'at least three' external panel members. In the view of the team, one panel member for a new MA International Sports Management was insufficiently independent of the presenting team, since she was closely involved in the management of an organisation that contributed to Richmond's undergraduate degree in the same subject. The team recalled that the initial scrutiny final report remarked that 'In an observed event ... it emerged that the external member was not sufficiently independent of the presenting team' though the report made it clear that the problem was noted and addressed.

56 It was noted in observations of validations at the preliminary scrutiny that validation reports were sometimes not fit for purpose: this was in part ascribed to lack of administrative support. Reports of Richmond-only courses from 2016-17 were uniformly better. The reports were nonetheless a good deal less comprehensive and contained significantly less detail than the equivalent reports for OU events. They were much shorter: between three and four pages in length (one of which is a contents page), where the OU reports were all between 10 and 18 pages. While several pages of the OU reports were devoted to tabular factual information, the reports provide clear indications that the panel considered key criteria, and that these had been met ('Learning outcomes demonstrated and assessed'). However, where the OU reports provide an analysis of the proposals against the criteria for validation, the Richmond reports are structured as accounts of the discussions, meeting by meeting. In some reports, it is difficult to understand the reasons for a recommendation or a condition from the information provided. According to the Quality Manual, validation reports are 'Important sources of qualitative information about the design, development, monitoring and evaluation of programmes', although it is difficult to reconcile this statement with the reports compiled. Future reports should however benefit from the appointment of the additional Quality Assurance Officers in the Department for Academic Affairs and Quality Assurance, who were not in post when these validations took place.

57 The report sub-headings implied that meetings were expected with students; and the Quality Manual includes 'Meeting with students (if appropriate)' in the standard list of requirements. However, in all but one case there was no meeting with students for the Richmond validations. The exception was a meeting with a single student. While it may be objected that no student would be available for a programme in a new master's course, in all cases there were related courses at undergraduate level, and in some cases related courses at the same level. All the OU revalidations included meetings with students.

58 The papers of the Academic Board demonstrate that all the formal steps for validation had been taken in accordance with the Quality Manual. To take an example, for the validation of MA International Sports Management, rationale and course specifications were provided to the Board; validation panel members were duly identified and approved; reports were returned and approved, and papers confirming fulfilment of conditions were put before the Board. However, as previously noted (see paragraph 55), the independence of an 'external' panel member was questionable, but according to the minutes of the Board no query was raised. The description of

'how conditions have been addressed' was brief and lacked detail. The conditions related to quite fundamental matters, such as where the programme was to be delivered, and the provision of staff to deliver it. A statement that 'appropriate staffing and budget requests have been made' was deemed sufficient to meet the latter condition. Confirmation that the conditions were met was given by the dean of the relevant school: there was no indication of whether the external members (or even the Chair) had accepted that the actions proposed met the criteria. The minutes of the Academic Board that received this confirmation record no query from Board members. In short, the team considered that various steps of this validation were formally correct, but they were taken rather uncritically, and the opportunities for informed peer scrutiny of the quality and standards of the programme proposal were not fully exploited.

59 In relation to external advice, the specific point made by the final report was in relation to the members of the Academic Committee. The team confirms that the Committee has been considerably strengthened in this regard. Most Committee members are not members of staff. The Chair is a former chief executive of QAA; two of the members are ex-vice-chancellors (or their United States equivalent); one is an academic with high standing in the discipline of higher education. They remain Trustees, rather than fully 'external' voices, although their self-evident integrity and experience probably make this qualification unnecessary. The advice they gave in the meeting observed was perceptive and unambiguous. The Academic Committee and its external members could potentially have a very positive effect, if their comments are communicated accurately, and acted upon.

60 The scrutiny team concludes that a unified system for quality assurance has been created for Richmond and mapped in its Quality Manual. The team considers that, in most respects, the system is now effective and rigorous, although around validation there remain some shortcomings. The University has put itself in a position to benefit from continuing external advice from the individuals with extensive experience of working in other UK higher education institutions now appointed to its Academic Committee.

Continued steps taken to bring Richmond's own programmes into full alignment with UK expectations

61 Richmond's own programmes include a suite of courses (modules) delivered in Italy; a single undergraduate programme, BA International Sports Management, based in Leeds; and several masters' programmes. The original scrutiny team report concluded that, while OU-validated programmes are aligned with UK expectations, further steps were needed to bring the other programmes into full alignment. Matters at issue included some variations between the way in which these programmes were monitored annually, particularly in relation to external examiner reports; evidence that differences between learning outcomes at levels 5 and 6 were in some cases insufficiently appreciated; and questions at some validation events as to whether subject benchmarks were consistently met, which led an external panel member to conclude that the attempt to make the degree meet United States and UK norms was not altogether successful.

62 As described in paragraph 55 there were five validation reports for Richmond programmes during 2016-17, for seven masters' programmes in business and marketing, international sports, and visual arts. All the programmes validated follow UK conventions in relation to specification of level and learning outcomes. None of the reports questions any divergence from the expectations implicit in subject benchmarks.

63 No non-OU undergraduate programme was validated during the year, but several programmes leading to OU awards were revalidated successfully. Although the reports of the events provide only indirect contextual evidence regarding the convergence of Richmond-validated programmes with OU, and by extension, UK expectations, the most recent set of OU validation reports do not demonstrate the difficulties in this area identified in the first part of the

scrutiny. A condition on the Performance and Theatre Arts programme involved redesignation of level of one module, but this was in relation to the structure of the programme, with no implication that the stated learning outcomes had been specified at the wrong level. There is no evidence from 2016-17 external examiners' reports or OU validation reports that differences between levels are misunderstood. The report of the revalidation of Fashion and Marketing programmes comments on 'the sound alignment to the QAA Subject Benchmark Statements'. The latest OU feedback on annual monitoring, for 2015-16, confirms that 'the standards set are appropriate for the awards and align with the relevant subject benchmark and quality indicators'.

64 None of the 2016-17 OU validation reports questions whether the combination of United States and UK conventions in the content and delivery of the degree had been successful; on the contrary, one comments on the creative way in which the prior qualifications of students entering via the study abroad programmes, which require Grade Point Averages at a certain level, and prerequisites, are used creatively to enrich the cultural mix of the student body.

65 Annual monitoring reports are required of all Richmond programmes. Although there are marginal differences between the way Richmond monitors its own programmes and those of the OU, these are not material. External examiners are now routinely appointed, and their reports and the University's responses to them are a key element of monitoring in the cases of both Richmond and OU awards. All Richmond-validated courses have now been mapped to the FHEQ and take account of UK Subject Benchmark Statements. The sole undergraduate Richmond-only programme, BA (Hons) International Sports Management, having not been externally examined formerly, has been externally examined since 2015-16; and, in the latest report, which is generally positive, the external examiner commented that 'the programme is effectively related to the QAA Benchmark statements for sport related courses and those which focus on general business management.'

66 The scrutiny team confirms that steps have been taken to bring Richmond's own programmes into full alignment with UK expectations, and that the University continues to be aware of this matter.

Other key developments

67 The appointment of a new chair of Trustees is a positive step. The Chair has significant relevant experience, including as Chief Executive of the Qualifications and Curriculum Authority a former Headmaster of Winchester College, and former Director General of the International School of Geneva. He sees marketing and recruitment as key priorities, and wishes to decrease the need to rely on donations. He also wants to tighten decision making in, and the minuting of, committees. He has been a trustee since 2009.

68 New members of the Board of Trustees include one with a successful corporate career, who is keen to help to develop marketing and proposals to increase donations from alumni. The two most recently appointed trustees include one with experience in finance, and another working at a senior academic level in higher education.

Conclusion

69 To conclude, the scrutiny team considers that the University has taken steps to address each of the concerns raised by ACDAP in May 2016. In the main body of this supplementary report it has discussed the documentary and oral evidence presented by the University, in relation to each area of concern, during the re-activated scrutiny process.

70 In each area, the team considers that the University has made substantial progress. Significant developments and improvements were previously discussed and summarised at the end of each section of the report (paragraphs 18, 27, 33, 42, 47, 51, 60, and 66). However, in

some areas the team found that developments in some areas are still 'works in progress' (paragraphs 27, 42, 47, 51); in others, it was too soon to evaluate the impact and effectiveness of the measures taken and the changes made (paragraphs 18, 33). Some shortcomings remain around validation (paragraph 60).

Consideration by ACDAP

71 ACDAPs consideration of the findings presented in this update report and the final report of May 2016, led to the decision at the February 2018 meeting of ACDAP to recommend that the University be granted degree awarding powers. The Committee concluded that sufficient progress had been made to address the shortcomings and vulnerabilities identified in the 2016 final report. Although the University continues to be financial vulnerable, the current financial management and governance arrangements at the institution were sound and actions taken to manage financial risk were appropriate. While some weaknesses remain, particularly regarding programme validation, the overall effectiveness of procedures for assuring academic standards and quality assurance were sufficient. The Committee therefore considered in February 2018 that all the criterion for taught degree awarding powers were met.

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