



Application for Foundation Degree Awarding Powers: Leeds City College Group

Scrutiny team report

November 2017

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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 Leeds City College Group (LCCG) for the power to award foundation degrees.

The application was considered under criteria approved by Government in 2010. 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 2010 FDAP criteria,¹ namely:

- governance and academic management
- academic standards and quality assurance
- scholarship and the pedagogical effectiveness of academic staff
- the environment supporting the delivery of foundation degree 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.

¹ The FDAP criteria are available in the Department for Business, Innovation and Skills guidance: *Applications for the grant of Foundation Degree awarding powers: Guidance and criteria for applicant further education institutions in England and Wales* (2010) at www.gov.uk/government/publications/applying-for-foundation-degree-awarding-powers (England).

Executive summary

Governance and academic management

Both Leeds City College (LCC) and Leeds College of Music (LCoM) have effective structures in place to manage and develop their higher education (HE) provision. Policies and procedures are currently being harmonised where appropriate although the current objective of LCoM to become a free-standing higher education institution (HEI) within the Group with a separate Teaching Excellence Framework and external review poses a question mark over future arrangements; the Group is in discussions with the Higher Education Funding Council for England (HEFCE) to clarify the position on this matter in the context of its HEI application. A key theme pursued through the detailed scrutiny was the degree of cohesiveness of the academic community within the whole Group structure, and specifically between LCC and LCoM.

Experience of exercising devolved authority under the terms of its agreements with the Group's awarding organisations, the successful outcome of the QAA 2016 Higher Education Review (HER) and the ease with which LCC, under the lead of the Higher Education Development Office (HEDO), was able to revalidate its provision with a new awarding organisation during the course of 2015-16 are positive indicators of institutional ability to assume foundation degree awarding powers. The regulatory framework in prospect to govern the award of its own HE qualifications (see Criterion B) is appropriate, though at the time of the scrutiny responsibility for where oversight of foundation degree regulations will reside had not been specified.

During the course of the scrutiny the Group, as a whole, was striving to establish a coherent Group structure along with a new Group mission, values and strategy. This process has been protracted and, indeed, was not completed at the conclusion of the scrutiny. At times during the scrutiny the relationship between the Executive and the Board appeared to the scrutiny team to be less than harmonious. However, changes that have been implemented and are planned to the Group structure, with a Group Board that oversees targets, manages risks and sets targets for its constituent members, forms, in the view of the scrutiny team, a sound basis for the successful future functioning of the Group. Key current Group strengths include its relative financial stability underpinned by a rigorous business planning and performance review process, judicious management of risk and ambition for the future, as evidenced by substantial investment in the Group estate and educational infrastructure.

On the basis of these findings ACDAP concludes that Leeds City College Group meets Criterion A.

Academic standards and quality assurance

The Group takes account of the UK Quality Code for Higher Education (Quality Code) and other external reference points in the management of its HE provision. External peers and, where appropriate, professional and statutory bodies and relevant employers are engaged in processes for establishing and maintaining the comparability of the standards of programmes of study. Processes and mechanisms are operated for engaging external examiners in assessment processes. There is some variability in the breadth of engagement with employers, and limited progress has been made to ensure the involvement of external academic peers in the Group's own approval processes.

Designated staff of HEDO at LCC and the Academic Registry at LCoM, respectively, are responsible for ensuring that staff are provided with information and guidance on LCCG's and partners' policies and procedures for programme design, monitoring and review. This provides a reliable central focus for HE provision. Programme approval and validation

events, and monitoring, review and planning policies and procedures are embedded and understood by relevant staff. Processes for amending and improving programmes are clearly defined, with responsibilities appropriately assigned.

Changes have been made to strengthen financial planning and resource allocation. There is an explicit and close relationship between academic planning and decisions on resource allocation, and formal links are in place for the involvement of learning support services. Mechanisms are in place for safeguarding the interests of students when decisions are taken to close a programme or programme element, but no measures were in place at the time of the scrutiny to ensure that the associated procedural and regulatory requirements are adhered to consistently.

Self-assessment and self-reflection are evident in a number of institutional processes. Annual and ongoing monitoring processes are embedded and entail scrutiny at all stages. Processes are in place for reflecting on and responding to external examiners' reports. Programme annual reports are self-critical and contribute to the process of monitoring academic quality and standards across the Group, illustrating a commitment to the continuous improvement of HE provision and the improvement of student achievement. Monitoring and review processes are supplemented by the use made of a 'special measures' process for programmes where performance is causing concern.

The policy on learning and teaching is aligned to institutional academic objectives, and addresses characteristics of foundation degrees, such as the work-related element. The Group's approach to work-related placement learning is guided by a common Work Placement Policy. While some LCC students receive a tutor visit, a remote oversight model for tutor supervision is operated. Where some part of a programme is delivered outside the College's environment in a placement setting there are deficiencies in processes and mechanisms for managing, monitoring, and reviewing this provision that may lead to variability in learning opportunities and a lack of equivalence in the student learning experience.

The Group operates module and examination boards that monitor the performance of students. These boards are professionally administered and make effective use of assessment data. The reliability and validity of assessment procedures are monitored and assessment outcomes inform future programme planning. However, implementation of mitigating circumstances procedures does not always result in full compliance with regulatory requirements.

Though the extent of delegation to LCoM for University of Hull awards is more limited in comparison, LCC has enjoyed significant delegated responsibility for regulatory matters in respect of the awards of university partners. The Group has discharged its contractual responsibilities to the satisfaction of awarding bodies and awarding organisation. A shadow regulatory and procedural framework has been developed, including a set of academic regulations to govern the Group's own awards, should its application for foundation degree awarding powers be successful. LCCG has in place an appropriate regulatory framework to govern the award of its own foundation degree qualifications.

ACDAP considered that the strengths in Criterion B: Academic standards and quality assurance far outweighed the weaker areas and, given the strengths in critical self-assessment, the College could be relied upon to take appropriate actions for improvement. On the basis of these findings ACDAP concludes that Leeds City College Group meets Criterion B.

Scholarship and the pedagogical effectiveness of academic staff

The LCC mission and vision for HE Statements set the ethos whereby all HE staff are focused on the need to contribute to the College in terms of outstanding performance, creating a culture of research and experimentation and as a leading vocational, intellectual and creative resource for the communities it serves. The mission of LCoM is to enable the students to become creative, confident and versatile practitioners in their chosen fields, producing high quality musical activity and music education, with world-class facilities and a strategic aim of embedding collaboration within its culture and a focus on team development to inspire staff to support students and each other.

All new staff undergo a general LCC or LCoM induction and HE induction that includes development sessions from the course manager, a mentor to advise and supervise, a peer observation within the first few weeks and monitoring for one year. All academic staff new to higher education receive training on HE assessment regulations, and experienced staff have opportunities to repeat and review the training. Programme development teams receive training and staff development activities in relation to programme design and approval, which enable staff to develop awareness of monitoring and review processes. Staff development activities across the Group enable opportunities for staff to be made aware of external requirements in relation to academic standards and the quality of learning opportunities, as well as providing additional opportunities for reflection on internal procedural and policy requirements.

Staff profiles show a high engagement with employment experience and up-to-date practice across the Group. All LCoM staff are required to be in practice relevant to their area of music and so have current employment experience. Overall, there is a high degree of engagement in employment and professional practice.

In its Higher Education Strategy, LCC states its aim to develop a research profile through scholarly and pedagogical activities that will underpin the growth, development and strategic management of higher education. It aims to deliver a staff development programme in order that the College is prepared for increased responsibility, to support staff in scholarly activity and monitor the impact upon learning and teaching, and to promote membership of the Higher Education Academy (HEA). Staff profiles of 2014 and 2017 reveal an increase of under three per cent in engagement with the pedagogic development of their discipline through membership of the HEA and other professional associations. Given the higher education strategy aim this is a low increase in engagement over three years.

On the basis of these findings ACDAP concludes that Leeds City College Group meets Criterion C.

The environment supporting the delivery of foundation degree programmes

There are effective processes to monitor and review the teaching and learning activities, teaching and assessment and to confirm that standards are being achieved and maintained. Arrangements for the timely and accurate feedback on the outcomes of assessment are in place and effective. Constructive and developmental feedback is given to students on their assessment; although the Group intends to strengthen its approach to assessment and feedback in response to declining student satisfaction in the National Student Survey (NSS).

The Group continues to invest in its estate and physical resources for HE provision, including the creation of a University Centre for its higher education LCC students. The consideration of learning resources is taken account of at all stages of the programme lifecycle and the Group has demonstrated its responsiveness to student requests in this area.

Students receive an effective induction into their studies and student retention, progression and performance are routinely monitored.

There are mechanisms for obtaining feedback from students, staff and employers, although the College has experienced some difficulties in student representative attendance on deliberative committees. There are some issues with the provision of current information. There was a lack of clarity in the information provided to mentors regarding their role, which may lead to inconsistency in the student experience.

Mechanisms are in place to deal with student complaints and appeals and a confidential counselling service is available to students. The Group has a strong commitment to equality, diversity and inclusion and identifying and supporting staff development opportunities.

On the basis of these findings ACDAP concludes that Leeds City College Group meets Criterion D.

Privy Council's decision

The Privy Council's decision is to grant Leeds City College Group renewable foundation degree awarding powers from 1 September 2018 until 31 August 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 foundation degree awarding powers (FDAP) by Leeds City College Group.

The application was considered by QAA's Advisory Committee on Degree Awarding Powers (ACDAP) in September 2015 when the committee agreed to proceed to the detailed scrutiny of the application. The team appointed to conduct the detailed scrutiny comprised Ms Alyson Bird (student), Professor Emeritus Nicholas Goddard, Professor Emeritus Jethro Newton, Ms Trudy Stiles and Mr Gregory Clark (secretary). The detailed scrutiny was managed on behalf of QAA by Mr Derek Greenaway, Assistant Director.

The detailed scrutiny began in October 2015, culminating in a report to ACDAP in November 2017. In the course of the scrutiny, the team read a wide range of documents presented in support of the application. The team also spoke to a range of stakeholders and observed meetings and events pertinent to the application.

Key information about Leeds City College Group

Leeds City College Group is the largest general further education college in the region with over 1,200 full-time equivalent staff, 35,000 students and an annual turnover of approximately £79 million. The College's mission is to be an exceptional and responsive college providing life-changing education, skills and experiences for individuals, businesses and communities.

The Leeds City College Group (LCCG) consists of five constituent parts: Leeds City College (LCC), Leeds College of Music (LCoM), LCC Commercial, Keighley College, and the White Rose Academies Trust (WRAT). While only LCC and LCoM are currently providers of higher education, Keighley may also provide this in the future. As at July 2017, LCCG has 1,978 higher education students, comprising 1,784 full-time students and 194 part-time students.

The College has worked with Teesside University since 2012-13, with the last intake of students on validated programmes in September 2016. LCC now works with the Open University (since September 2016) and LCoM with the University of Hull (since 2013-14). LCC was approved to deliver Pearson BTEC Higher National programmes in 2012.

The LCCG governing body has overall responsibility for the Group's mission, quality strategy, effective and efficient use of resources and solvency. Governance and Group structure were in transition over the duration of the scrutiny but the former LCC Code of Conduct explicitly recognises the Nolan Principles of Public Life and continues to provide a framework for the conduct of governors and the proceedings of the Board. Prior to the commencement of the scrutiny, changes were made to the LCC's governance structure; all subcommittees other than audit were disbanded in April 2014 and the Board meets monthly to allow it to exercise close oversight of the College activities and academic and financial performance. For the year 2016-17 the Board met as a Group Board rather than the 'Leeds City College Board' as was formerly the case. This was a response to the need to establish a fully functioning Group structure and appropriate governance. Additionally, in the course of the scrutiny there was protracted discussion at Board level as to the future strategic direction, mission and values of the LCCG as a whole; these deliberations had not been concluded at the time of the conclusion of the scrutiny.

As a wholly owned subsidiary of LCC, Leeds College of Music (LCoM), which is the largest Group provider of higher education, has its own Board of Directors and is chaired by a Group board member who also has lead responsibilities for group HE provision. Since

September 2016 this reports to the Group Board, which the LCoM Principal and Managing Director now attends.

Statement on progression arrangements

In its critical self-analysis, the College states that all LCC foundation degrees have identified progression routes as noted in the validation documentation. The College offers progression routes for all of its foundation degrees in the form of level 6 top-up courses. Other progression routes are available for students.

The scrutiny team concludes that the College has developed a suite of procedures and regulations to govern study for students registered on foundation degrees. These are comprehensive and apply to all stages of the student journey and include clear guidance on such matters as admissions, registration, assessment, academic integrity and progression and awards. Separate regulations are available for specifically LCoM provision in its progression arrangements with the University of Hull.

The scrutiny team confirmed that the College's foundation degrees address the defining features as described in the *Foundation Degree Characteristics Statement*, such as employer involvement, accessibility, articulation and progression.

Detailed scrutiny against foundation degree awarding powers criteria

A Governance and academic management

Criterion A1

A further education institution granted foundation 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. As is generally the case for other organisations receiving degree awarding powers that are not primarily a higher education institution, its principal activities are compatible with the provision of higher education programmes and awards.

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

1 The Leeds City College Group (LCCG) governing body has overall responsibility for the Group mission, quality strategy, effective and efficient use of resources and solvency. Governance and group structure were in transition over the duration of the scrutiny but the former Leeds City College (LCC) Code of Conduct explicitly recognises the Nolan Principles of Public Life and continues to provide a framework for the conduct of governors and the proceedings of the Board. Before the start of the scrutiny, changes were made to the LCC's governance structure; all subcommittees other than audit were disbanded in April 2014 and the Board meets monthly to allow it to exercise close oversight of the College activities and academic and financial performance. For the year 2016-17 the Board met as a Group Board rather than the Leeds City College Board as was formerly the case. This was a response to the need to establish a fully functioning Group structure and appropriate governance. Additionally, in the course of the scrutiny there was protracted discussion at Board level as to the future strategic direction, mission and values of the LCCG as a whole; these deliberations had not been concluded at the time of the conclusion of the scrutiny.

2 As a wholly owned subsidiary of LCC, Leeds College of Music (LCoM), which is the largest provider of higher education within the Group, has its own Board of Directors and is chaired by an LCCG Board member who also has lead responsibilities for the Group's HE provision. Since September 2016 LCoM's Board reports to the LCCG Board, which the LCoM Principal and Managing Director now attends.

3 At the commencement of the scrutiny a new system of financial reporting, forecasting and planning was instituted for LCC by the incoming Group Principal/CEO with effect from January 2016 onwards. The core principles are that each year the Executive Leadership Team (ELT) buys business plans from 'Business Units', which are comprised of the various schools, departments and companies across the Group as a whole. The sum of the income in the business plans comprises the College Income Target and the sum of the expenditure comprises the College Expenditure Target. The business planning system is designed to secure a high degree of accountability from academic and support units and to deliver better outcomes for less expenditure per student in the delivery of the curriculum and the same or better levels of service provision without additional staff. The system gives increased autonomy to College directors and heads of department to enable rapid responses to changing external circumstances to be made and to facilitate innovation.

4 The business planning is explicitly linked to the LCC overarching mission and higher education strategy. The six strategic aims consistently inform planning and risk

assessment. LCoM, as a specialist provider of musical education, has its own distinctive vision, mission, values and strategic aims with the broad objective 'to be a leading European conservatoire'. LCoM has considerable autonomy to set its own objectives so long as they are compatible with those of the Group as a whole. It reports to the Group board which oversees its financial performance. The LCC overarching higher education strategy for the period up to 2018 is designed to ensure that 'the needs of the market can be met effectively and efficiently with minimum risk to financial stability'. The business planning and performance review process, with its emphasis on responsiveness and accountability in the allocation of resources, and the continuous review of performance provides, in the view of the scrutiny team, strong underpinning of this key objective. LCoM is included in this process.

5 Each business unit, termed 'Directorates' reports to members of the ELT at three-monthly periods through the financial year, which enables them to check that business plans are being delivered within budget and to agreed quality indicators. Review meetings focus on key areas of performance. The degree of scrutiny of performance measures and budgets is detailed and allows a continuous review of resource allocation with resource needs being identified at an early stage. Although the business planning and performance review process is still relatively new and subject to further refinement (in, for example, data collection, analysis and presentation) and has yet to be fully evaluated, the scrutiny team concludes that it provides a robust mechanism whereby the Executive and Governors can ensure that financial planning, quality assurance and resource allocation policies are being implemented, are coherent and relate to its higher education mission, aims and objectives.

6 There are clearly defined responsibilities allocated to college senior management for the planning, monitoring and forecasting of discrete components of the HE income and expenditure budget and HE quality assurance. Higher education income is overseen by three senior staff: the Deputy Principal, Teaching and Learning, who has overall responsibility for higher education; the Dean of the Higher Education Development Office, who is responsible for the quality assurance of HE; and the Principal and Managing Director of LCoM. Monthly financial management reports are prepared by the Group Director of Finance and financial reports and forecasts are considered at monthly Board meetings where the scrutiny team confirmed that they receive searching scrutiny from the perspective of, for example, the confidence that can be placed in the assumptions underlying income forecasts, particularly the reliance that can be placed on variable components of income.

7 For the year ended 31 July 2015, there was a consolidated historic cost deficit of £489,000 which was 0.6 per cent of total income. During the first part of 2016 a revised Group Financial Strategy was developed with the key objectives of enabling the Group to generate sufficient surpluses to enable it to invest in human and physical resources to improve the quality of the learner experience. The surplus is measured with reference to EBITDA (Earnings before interest, tax, depreciation and amortisation) and the Group sets a return of between five per cent and 12 per cent of income. The Group expects to have a financial health rating as measured by the SFA (now Education and Skills Funding Agency ESFA) at a minimum level of 'satisfactory'. This financial framework was originally adopted in November 2015 and is regularly updated.

8 The three-year Group Strategic Plan 2016-17 to 2018-19 adopted by the Board in July 2016 provides for EBITDA of 5.36 per cent for 2016-17 rising to 9.63 per cent by year three (2018-19). The plan provides for a financial health rating of 'satisfactory' for years one and two rising to 'good' by year three. The plan is modelled to provide for both 'high case' and 'low case' assumptions for income in years two and three; the 'lowest case' EBITDA outcome is projected to be 5.98 per cent for 2017-18 and 6.0 per cent for 2018-19. Total expenditure for the Group (excluding capital grants) as a whole is projected to rise over the three-year period from £71.1 million to £77.3 million and total expenditure from £67.3 million

to £69.9 million. Recurrent savings are planned to be achieved through changes in the teaching mix, reductions in management costs in the order of 20 per cent with uncertainties/challenges identified to pay cost assumptions in particular. These include the level of future pay awards, the impact of the Apprenticeship Levy, National Insurance contributions and possible pension contribution rate increases.

9 The Group Budget includes a number of discrete operating units. Two of these are currently loss-making - Keighley College and the recently constituted Commercial Division. The two providers of HE, LCC and LCoM, have a surplus over expenditure with EBITDA of 8.5 per cent and 7.9 per cent respectively. The Board is addressing the Group loss-making components; the Keighley College Draft Development Plan, which is currently being developed, plans for a seven per cent EBITDA by 2021.

10 During the period of the scrutiny the Group was engaged in a number of substantial capital projects as part of its overall Property Strategy. Apart from the overarching Group objectives to create world-class education and training facilities for Leeds and the Leeds City region it focuses on supporting the Local Enterprise Partnership (LEP) strategic economic priorities and skills plan needs. It recognises the need to replace and consolidate legacy estate in poor condition and in sub-optimal locations (partly arising as a result of the Group failing to generate sufficient surpluses in the past) with an emphasis on locating curriculum departments on a single site in order to avoid duplication and diseconomies of scale. The two major capital projects, which are part of the overall strategy, are the Printworks, due for completion 2016-17 with £7.1 million allocated for the final year, and ambitious plans for a site acquired at Quarry Hill to provide new buildings for health sciences, care, public services and arts as well as additional space for LCoM. Both of these projects are supported by substantial capital grants - in the case of Quarry Hill £33.4 million from LEP and West Yorkshire Combined Authority (WYCA) - with a draft target budget for the whole project of approximately £57 million.

11 It is the Group medium-term objective to locate HE on the Quarry Hill site but as an interim measure a Higher Education Centre, termed the 'University Centre' with Department for Business, Innovation and Skills sanction, was established in September 2016. Although expenditure amounting to £200,000 on this interim initiative was relatively modest, it has been well received by HE students and is evidence of the way in which financial planning and resource allocation relates to the Group higher education mission, aims and objectives.

12 According to the most recent figures available to the scrutiny team (period ending 31 May 2017), the Group was on target to meet or exceed its financial performance indicators for 2016-17. The position as at 31 May 2017 was an actual EBITDA of £6,921 million (11.49 per cent) forecast outturn 6.48 per cent. This takes account of reviews/forecasts from all budget-holders as part of the performance review process. This favourable position was accounted for by a stable income position and savings in both pay and non-pay items; a decline in 16-18 recruitment, which had negative financial impact, has been halted. Significantly, tuition fees were £972,000 over budget due to strong HE recruitment for both LCC and LCoM.

13 Given the fragility of the financial health of many leading providers in the further education sector, in April 2017 the CEO/Principal and the Chief Financial Officer presented the governors with an analysis of Comparative Financial Performance in the sector. This put the relatively favourable position of the Group into perspective with reference to another nearby regional further education/higher education provider while stressing the need for continual efficiency savings.

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

14 The Higher Education Development Office (HEDO) has broad responsibility for ensuring that the HE mission and associated policies are understood and applied consistently; this responsibility is discharged for LCoM by its HE Registry. The policies and procedures have been approved by the former LCC Higher Education and Quality Committee, the Higher Education Academic Board and the LCoM Academic Council. With effect from September 2016 a Joint (LCC/LCoM) Quality and Enhancement Committee and a Joint Higher Education Academic Board was established as part of an institutional drive to harmonise Group HE policies and procedures where appropriate. The LCoM Academic Council has responsibility for those HE policies that are necessarily specific to LCoM because of the distinctive nature of its provision. The Dean of HE, who is Head of HEDO, sits on the LCoM Academic Council to ensure consistency of approach in the interpretation and implementation of policies.

15 All Group HE policies and procedures are readily accessible on the virtual learning environment (VLE) portal and new staff are given a thorough introduction to HE procedures and regulations as part of their induction. This includes detailed information on policies relating to student information and the assessment process and essential forms and templates. New HE staff are mentored through their first year of HE teaching to ensure that they are interpreting regulations and procedures correctly as part of their induction. A short guide to regulations has been developed which provides clear answers to basic student questions, such as the minimum attainment levels needed to pass, procedures on late submissions, academic misconduct and attendance requirements.

16 Staff confirm that they are kept fully informed about regulations and new developments. For example, they had received briefings by HEDO on programme development and the requirements of LCC's new awarding body, the Open University (OU) following the decision of Teesside University to withdraw from its collaborative partnerships early in 2016. Staff were given training on such matters as assessment and moderation policy and all information was readily available on the VLE. Both LCC and LCoM HE students speak highly of the induction that they received and confirm that regulations on such matters as assessment, including awarding body requirements, and expectations on the turnaround of marked work and feedback were readily accessible.

17 In the course of the scrutiny the team was able to confirm that policies were largely applied consistently by staff. In programme approval for example, which is managed by HEDO, there are common templates that have been developed and members of programme development teams are clearly conversant with the detail of the overall programme approval process and of their responsibilities.

18 Similarly, Awards Committees – the equivalent of Programmes Committees as more usually understood – make use of college templates for agendas and minutes to ensure consistent application of quality assurance systems. Programme teams cannot make changes to such key areas as module specifications without HEDO approval. Where there are instances of non-compliance with regulations, HEDO intervenes as was confirmed by an example of FDs in Applied Computing and Networking and Security.

19 The scrutiny team concludes that HEDO gives meticulous attention to the consistent application of policies and procedures. This was well evidenced with reference to a HEDO-led 'Annual Planning Meeting' where one or more representatives from each programme area meet together with the Dean of Higher Education and Higher Education Academic Registrar. Apart from sharing experience of the past year, proposed minor

changes to the assessment pattern for the forthcoming year were subject to thorough scrutiny through an overview of 'assessment grids' which detailed the timing and speed of assessment. Any changes had to be justified and had to conform to the overall regulations on assessment.

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

20 LCCG consists of five constituent parts: LCC, LCoM, LCC Commercial, Keighley College, and the White Rose Academies Trust (WRAT). While only LCC and LCoM are currently providers of HE, Keighley may also provide this in the future. The Commercial Division was formally established in August 2016 with a focus on marketing apprenticeships to employers. The White Rose Academies Trust delivers secondary education in deprived parts of Leeds. The performance of the institutions which are not HE providers has implications for the financial health and reputation of the Group as a whole. The WRAT academies, for example, are currently graded by Ofsted as 'requiring improvement'.

21 On coming into post, the new Principal/CEO concluded that the Group structure needed to change in order to achieve secure foundations for the future success of the Group. Weaknesses in the Group structure as it then existed included the situation whereby little that related to LCoM or WRAT business came to the Board, which was then predominantly concerned with LCC matters, the Group level Finance Director did not have oversight of LCoM budget planning and that there was some uncertainty as to the extent of LCC Board governors' responsibilities.

22 Following initial discussion, a proposal for a new Group Governance Structure was tabled at the July 2016 Board. This proposed a Group Board and a Group Audit Committee with separate Boards set up for LCoM, LCC, WRAT and Board subcommittees for Keighley College and LCC Commercial. A reconstituted Group Executive Team would consist of Principals/CEOs of Group members and core Executive members including the Directors of Finance and LCC Commercial and Deputy Principals for Teaching and Learning, Corporate Services and Human Resources. The structure was planned to deliver significant Group financial savings through the sharing of services, with members being able to challenge service departments to provide value for money. Consultation was initiated at this stage to identify an appropriate overarching Group name.

23 Full implementation of the revised Group structure has been slower than anticipated and discussion of the details has been ongoing at Group Board meetings and at the Governors Strategic Away Days. On the recommendation of a governors' 'task and finish' group to expedite the process of determining an appropriate model of Group structure and governance, the position reached at the conclusion of the scrutiny was to build upon the proposals presented at the July 2016 Board meeting and partially implemented for 2016-17. It is proposed that a reconstituted Group Board will meet quarterly and have strategic oversight of all parts of the Group, approving and monitoring long-term and annual plans and ensuring compliance with statutory duties. Each Group constituent member would have its own local/subsidiary boards. In addition to the existing Audit Committee, new committees would include Remuneration, Governance and Nominations, and Property Strategy. With regard to the specific governance oversight of HE, it is planned that the LCC and LCoM subsidiary boards would have oversight of HE in their respective institutions, reporting to the main Group Board. These arrangements are planned to be operational for the year 2017-18, although final recommendations were due to be presented to the July 2017 meeting of the Board.

24 The scrutiny team's findings in relation to the regulatory framework in prospect to govern the award of its own HE qualifications are discussed under Criterion B1. The terms of reference for the Higher Education Academic Board state that it is responsible for academic policies and procedures in respect of external validating and accrediting bodies, but neither these terms of reference nor those for the Higher Education Quality and Enhancement Committee as yet specify where the responsibility will reside for maintaining oversight of the regulations for foundation degree awards.

25 Parallel to the work towards establishing an appropriate Group structure has been extended consideration of Group vision, mission, values and name. Proposals tabled by the CEO/Principal at the September 2016 Board meeting did not meet with governors' acceptance; indeed, there was some disagreement as to what constituted a 'strategy'. Following this, the Group has commissioned an external marketing company to provide input into the strategy drawing on the views of staff as well as regional stakeholders. LCoM also commissioned a report on the perception of its 'brand'. Following the Governors' January Strategic Seminar it was determined that a subgroup would work with the Principal/CEO to produce a strategic plan as part of a 'task and finish' group. Proposals tabled at the March 2017 Board meeting on 'Group Mission, Vision, Values and Group Name' did not meet with acceptance by governors and an external consultancy group has been engaged to expedite progress. Unresolved matters include what constitutes the Group 'Unique Selling Point' (USP) and its geographical range and target market. Following discussions between the consultants, Board members and the CEO/Principal, a short preliminary report was tabled by the consultants at the June 2017 Board meeting which indicated only that the production of a strategy was work in progress. Significantly, this commented that the consultants had been 'struck by the differing definitions and expectations Board and Executive hold about the strategy and the strategy process'.

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

26 The Principal of LCC and CEO of the Group came into place in September 2015 shortly before the commencement of the scrutiny after a phased transition from the previous incumbent. He brings to the College broad experience at senior level of further education providers with higher education provision. He conveys to staff a clear vision of the purpose and vision of LCC, highlighting challenges on quality, financial prudence combined with the generation of income for investment in first-class facilities, systems and processes. An early opportunity was taken to modify some executive roles in Finance, HR, Physical and Corporate Services, Curriculum and Teaching and Learning and Commercial Services. Important higher level Group-wide change initiatives include the introduction of rigorous and accountable business planning and performance review, work towards the establishment of a more coherent group structure, an ambitious property strategy and work on a Group mission and values. As far as specifically HE leadership is concerned more responsibility for leadership has been delegated to the Dean of HE and HEDO. The Principal and Managing Director of LCoM also conveys a clear vision for that institution with its objective of becoming a leading European conservatoire with a continuing distinct identity within the Group but as a separate HEI.

27 An Executive Leadership Team comprising the LCC CEO/Principal and the key LCC Directors/Deputy Principals meets weekly and has the remit to take a strategic overview and prepare papers for briefing governors. It has recently introduced a system of producing background papers, which present a succinct overview of the College situation with regard to a particular topic. This is in four sections, the first of which is 'Leadership and Management - overall structure' followed by 'Teaching, learning and assessment - overall summary', 'Personal development, behaviour and welfare' and 'Outcomes'. The intention is that these background papers will provide a quick grasp of the College's position in a

particular area and enable it to identify what is required to achieve the desired outcome. The scrutiny team considers that this system will enhance the ELT's effectiveness, particularly in allowing it to take a more strategic role, a need which has been identified by the Principal/CEO.

28 Higher education is not a specific agenda item at ELT meetings; this is a reflection of the balance of LCC educational provision. There is additionally an LCC and LCoM Joint Executive Committee, which includes both Principals, senior managers and the Group clerk and takes actions with regard to both operational and strategic matters at LCoM which is predominately an HE provider. HE also features in regular joint meetings of the ELT with directors. This allows the ELT to engage directly with senior members of staff with responsibility for the delivery of programme areas. Chairing of the ELT rotates between members, and the scrutiny team observed proceedings conducted in a cohesive and collegiate manner although there is some concern as to the way in which strategic issues are raised without papers being circulated in advance.

29 External governors play an important part in Group leadership and from scrutiny team observations take an interventionist approach to the discharge of their responsibilities. The Group benefits from high-level expertise drawn from commerce, law, higher education, local government and finance although its composition does not fully reflect the cultural diversity of the Leeds City region. The 2014 changes to governance structures were partially designed to secure a more business-focused approach to Group affairs, and this was apparent in the team's observations of Board proceedings. The staff and student governors were observed by the team to make valuable contributions to Board deliberations. Specific governors have 'lead' responsibilities for specific Group activities, responsibilities and strategic objectives including HE and, in the absence of subcommittees other than Audit, extensive use is made of governors' 'task and finish' groups. The lead governor for LCC HE also chairs the LCoM Board of Directors. As part of the current plans for new governance and group structures the appropriateness of governors' skills sets and the need for co-opted members to the Board is to be reviewed.

30 Governors interpret their role as to challenge the Executive, set strategy and monitor performance. In their observations of Board meetings the scrutiny team confirmed that the Board is proactive in its leadership role and frequently subjected information and decisions emanating from the ELT to intense scrutiny. Indeed, at times the team observed a degree of tension between the Board and the Executive. Examples include questioning around assumptions made in financial forecasts, aspects of health and safety observance, the adequacy of competitor analysis, the performance of the LCC Commercial Division, aspects of the implementation of the Property Strategy and the development of a Group Strategy together with Group mission and values. While strong leadership is provided by Board members under current arrangements a weakness of the monthly meetings is that they frequently overrun their allotted time and become inquorate so that business, sometimes at a high level, has to be conducted by email outside of the formal Board meetings. This may be rectified by the planned changes in governance and Group structure.

31 Specific leadership of HE is ably provided by the Dean of HE who is the Head of HEDO and reports to the Deputy Principal, Teaching and Learning. HEDO is given a considerable degree of autonomy and its supporting officers and staff are based in the newly opened University Centre, which gives it a clear identity. It provides an annual report on HE against strategic priorities. The HEDO Action Plan gives clear direction on key quality objectives in HE with assignment of responsibilities and measures of monitoring performance against target.

32 Effective leadership of specifically LCoM HE provision is provided by the LCoM Principal and Managing Director aided by the LCoM Director of Curriculum. An example of

a clear strategic view is provided by the current initiative to work towards achieving the status of LCoM as an independent HEI within the Group. The LCC Dean of HE and the LCoM Director of Curriculum work closely together as, for example, in the harmonisation of Group HE policies and the alternate chairing of the Joint Quality and Enhancement Committee.

33 The Group makes specific acknowledgement of the need to invest in the development of leadership and management capabilities in its approach to continuous professional development, and work in this area is ongoing. The 2014-15 self-assessment report concluded - from a further education (FE) perspective - that the effectiveness of middle managers was inconsistent across subject areas and performance management was not used well enough to raise standards in all areas. Further, middle managers did not take full responsibility for addressing issues of staff underperformance. It is a current Group Strategic Priority to create and deliver a People Strategy with a clear focus on leadership development, with a competency framework set for senior leaders. External consultants are retained to provide management development training. Current restructuring proposals are aimed at changing the focus and skills set of staff.

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

34 The Group has a range of general policies and those specific to its HE provision. An example of the former is the student disciplinary policy. The policies for both LCC and LCoM have been developed in accordance with the expectations and indicators of the Quality Code and this was given external confirmation during the course of the scrutiny by the successful outcome of the March 2016 QAA Higher Education Review (HER) of the Leeds City College Group.

35 LCC has an established policy production and agreement process and this provides for consultations, as appropriate, by a range of stakeholders. HEDO, as noted, has a key role in the development of Group HE, and the process of developing new policies, their communication and implementation is largely but not exclusively HEDO-driven. New policies are developed via the Higher Education Quality and Enhancement Committee (HEQEC) which includes students, and put onto the VLE for consultation. A similar process is in operation at LCoM but during the course of the scrutiny a considerable amount of work was expended on the harmonisation of policies, where appropriate, of the HE policies of the two current Group HE providers. While it was recognised by HEDO officers that responses to open consultation on policies is often minimal, confirmation of the effectiveness of the open channels of communication was provided by the example of the identification by a staff member of a need to consider the PREVENT duty policy in all policies where appropriate, which, as a result, was an addition to Group policies in 2015-16 together with a strengthening of equality and diversity policies.

36 The Dean of HE together with the LCoM Director of Curriculum have, under the direction of the Joint Executive Committee, audited respective institutional HE policies and procedures in order to identify which should be common and which should be distinct. The push to harmonisation originated in the institutional preparations for the HER (and, indeed, the FDAP application). Consultations with appropriate stakeholders took place for each policy. It is recognised that some HE policies will continue to be distinct between institutions given the nature of their respective HE provision. An example is student admissions where, in the case of LCoM, auditions constitute an important part of the process, and in the case of LCoM provision, assessment where performance constitutes an important element.

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

37 The scrutiny team confirmed that HE policies are regularly reviewed and continuously monitored with HEDO taking a lead role. Where shortcomings are identified, they are rectified, an example being a review of accreditation of prior learning documentation. Monitoring procedures identified that the procedures in place were not operating effectively as applicants had frequently to be asked for additional information and, following consultation, modifications were made taking into account the expectations and indicators of the Quality Code. Another example of policy modifications are changes to the assessment policy to include moderation to give clearer direction to tutors and to facilitate a comprehensive overview of the assessment lifecycle.

38 All LCC HE programmes are required to produce annual reviews and the range and appropriateness of the information required to be presented has been kept under review and changes made within the regulations of the awarding body. The review templates are comprehensive and include information on key performance indicators and external feedback.

39 A distinctive and positive feature of the means by which LCC HE policies and their implementation are monitored is the HE peer-review procedures. It has been developed to increase its effectiveness since its inception in 2009-10 and includes representatives of all programme areas. It is aligned with the QAA HER method, is a two-day event and includes meetings with students. It also provides the College with assurance that delegated responsibilities for quality and standards are being properly discharged. It enables the College, via HEDO, to focus on those areas where policies and procedures, or the way in which they are applied, may need adjustment. Thus HEDO identified a decline in student satisfaction with assurance and feedback for 2015-16 and therefore assessment, feedback and moderation provided focus for the peer review which took place in March 2017.

40 LCoM programmes also produce reviews monitored by the Academic Council. In addition, the Dean of HE attends the LCoM institutionally wide performance review, which is extremely comprehensive. It allows trends to be monitored, which indicate if any changes to policies or procedures are required. The LCoM Academic Council also oversees monitoring reports for its awarding body, the University of Hull.

41 The March 2016 HER made five recommendations which is a relatively small number considering the size and complexity of the Group HE provision. Two of these - concerning the mechanisms for the approval of information at LCoM and high-level oversight of the completeness and accuracy of information - were reflections of Group-wide arrangements rather than being specifically HE matters. The response to these two recommendations has been to establish a joint Information Group and a Harmonised Published Information Policy.

Academic risk and change management strategies are effective

42 The Group framework for risk management was agreed by the Audit Committee (which has a responsibility for maintaining an overview of the risk policy) and the Board in autumn 2015. The current review of governance has not proposed changes to the risk management framework that is in place. The objectives prioritise the integration of risk management into Group operations and culture and enable it to respond to new/emerging risks nimbly. The Board has overall ownership of strategic risk and the ELT operational management of strategic risks. A separate register is operated for LCoM. Risks are defined on probability impact criteria. Curriculum schools and service departments maintain their own risk registers which are used as management tools for identifying and controlling local risks set against the six strategic aims. A 'traffic light system' is in operation whereby there is

a 'RAG' rating on a scale of 1 to 25 where 1 to 5 'Green' is deemed 'Acceptable', 6 to 12 'Yellow' 'Acceptable but requires close monitoring' and 13 and above 'Red' - 'Not Acceptable, as identified risk appetite is low or where risk is unknown'.

43 The Audit Committee has important responsibilities in the oversight of Group risk management. The approach to the management of risk that the committee has adopted is for lead members who are allocated to identified risks to prepare 'deep dive' separate reports on specific risks for detailed discussion, which is considered to be of more value than a general overview of all risks at each meeting. Risks identified from the register for separate reports during the period of the scrutiny included competitor strategies, staff morale, up-skilling staff, retaining and attracting staff and income targets.

44 The Governors have access to a Group Strategic Risk Dashboard. This, at the conclusion of the scrutiny, consisted of 10 risks all rated as red or amber. Governors regularly review mitigation plans in place and/or planned by management. For example, those discussed at the May 2017 Board were that apprenticeship targets for 2016-17 are not met; that Group finances (cash flow) cannot sustain growth strategies in the short to medium term and that the Group is unable to resource its property strategy in the short term. The LCoM Board regularly reviews its own Risk Register and reports to the Group Board. Overall, Governors characterise the Group risk appetite as relatively cautious but also ambitious, and not collectively risk averse. The LCoM Board has a risk appetite workshop planned for January 2018.

45 The period preceding the commencement of the scrutiny was one of considerable change for LCC, driven as it was by the need for significant efficiency savings and associated staff reductions. This was less the case with LCoM which had undergone an earlier period of rationalisation following its acquisition by LCC in 2011. The implementation of rigorous business planning and performance review has also necessitated a cultural shift on the part of middle managers in particular. Governors maintain that rationalisation has been well handled with no prolonged disputes, while the CEO/Principal's assessment at the time of the conclusion of the scrutiny was that overall staff morale was low but improving in the absence of further top-down restructuring. Overall, higher education has been, and continues to be, a Group growth area with new appointments.

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

46 LCC HE academic standards are effectively overseen by HEDO which works increasingly collaboratively with LCoM through, for example, the operation of the Joint Academic Board. HEDO produces an Annual Review of Higher Education that includes a section on academic standards. That for 2015-16 noted that Module Assessment Boards enable the College to moderate outcomes across the entire provision and thereby identify areas where there is evidence of under-performance.

47 The Group has comprehensive mechanisms in place to oversee the operation of specific programmes. These include interim examination boards and committees that monitor performance mid-year and facilitate the early identification of any threats to standards at an early stage and Award Committee meetings which take place three times a year to monitor and review specific data against a set agenda.

48 External examiners are recognised as an essential component of the systems in place for the maintenance of academic standards. Although their appointment is presently conducted via the protocols of the Group's awarding bodies, the College has developed its own external examiner appointment process and an external examiner handbook that identifies their roles and responsibilities. HEDO monitors external examiner reports and produces an overall report in order to identify any overall themes or matters for concern.

49 Where concerns about standards or related matters are identified LCC operates a 'special measures' process whereby there is direct intervention by HEDO. The Dean of HE identifies where intervention is needed and this is endorsed by the Deputy Principal Teaching and Learning: any issues are also taken up as part of the performance review process and the programme is monitored throughout the year. The scrutiny team was informed that the form of special measures varies according to concerns, which may include such matters as student attainment levels or NSS scores. At present there is no formal policy defining 'special measures' although the scrutiny team was told that this was under consideration (see also paragraph 74).

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

50 The College has developed a comprehensive suite of procedures and regulations to govern study for students registered on foundation degree awards in addition to those prescribed by its awarding bodies. These are comprehensive and apply to all stages of the student journey and include clear guidance on such matters as admissions, registration, assessment, academic integrity, and progression and awards. They will provide a robust framework if the Group is granted foundation degree awarding powers. They are additionally supported by an overarching regulatory framework. Separate regulations are available for specifically LCoM provision, for example performance assessment procedures. As noted, there has been a harmonisation of HE policies between LCC and LCoM where appropriate. Policies and procedures in place fully take account of the expectations of the Quality Code as was evidenced by the successful outcome of the March 2016 Higher Education Review.

51 There is considerable experience of the production of materials and data for award boards at both LCC and LCoM and such boards are well and professionally conducted. Effective training for staff new to HE is provided and considerable emphasis is placed on the sharing of good practice. Additional evidence of the existence of institutional ability to manage the additional responsibilities associated with the award of foundation degree awarding powers is provided by the ease with which the revalidation of programmes to meet OU requirements was accomplished following the withdrawal of Teesside University as the LCC awarding body, with areas of commendation identified by the validation approval panel.

52 The Group has invested in its higher education administrative and development infrastructure, HEDO, now housed in the University Centre. Its officers, under the direction of the Dean of HE, provide effective support for the delivery of HE. However, while agendas for HE boards and committees are well organised and comprehensive, the scrutiny team observed some reliance on oral reports, including on the proceedings of lower committees, and examples of low attendance by academic staff and student representatives or inquoracy (see also paragraph 130).

B Academic standards and quality assurance

Criterion B1

A further education institution granted foundation 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

53 The academic regulations of the respective awarding bodies and awarding organisation, together with its own internal regulations, policies, and procedures, provide the Group's regulatory frameworks for HE provision and are accessible to staff and students through the respective VLE portals.

54 Teesside University commenced withdrawal from its academic partnership with LCC and the termination of validation arrangements with effect from 1 September 2016. Following a process of institutional approval, LCCG entered into a formal agreement with a new awarding body, the Open University, with validation arrangements being transferred from the outgoing partner.

55 LCC enjoys significant delegated responsibility for regulatory matters in respect of OU and outgoing Teesside University awards. This includes the initial stages of programme approval, the annual monitoring and review process, admissions, complaints and appeals, assessment, and the operation and administration of examination and awards boards. The extent of delegation for University of Hull awards is more limited in comparison. LCCG policies and regulations are developed in accordance with the requirements and expectations of the Quality Code and are allocated a specified review date. Mapping is undertaken to identify whose policies, procedures, and documentation are to be used within the overarching regulatory framework. Responsibilities of the respective institutions are clear. This process was followed prior to the validation and transfer of HE provision to the Open University. The scrutiny team confirms that, supported by appropriate briefing and training for staff and students, the process of transition from Teesside to OU regulations was effectively managed and implemented.

56 From scrutiny of regulatory frameworks, and observations of academic and quality assurance processes, and proceedings of deliberative committees, the team confirmed that LCCG has regulatory frameworks that are appropriate in design to its current status, meet relevant expectations of the Quality Code, and are fully operational.

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

57 LCCG has developed a shadow regulatory and procedural framework, including a set of academic regulations to govern its own awards should its application for foundation degree awarding powers be successful. The Higher Education Development Office (HEDO) has developed a suite of underpinning quality assurance policies and procedures to replace those of the awarding bodies. These are clearly signposted in quality assurance guidance documentation and cover matters such as assessment, academic appeals, and external examining. LCCG-devised policies and procedures are also in place for programme design and approval, for programme amendment and modification, and for programme monitoring and review; These are held on central portals.

58 During the period of scrutiny, work commenced on a process of harmonisation to achieve alignment between a range of currently separate LCC and LCoM academic policies and procedures, thereby creating shared single policies (see paragraph 213). These policies include curriculum-oriented and student-facing policies, such as assessment, academic appeals, work placements, and student engagement. This process provides opportunities for strengthening the Group's approach to academic standards and academic quality, and for bringing together selected policies and procedures into single overarching LCCG documents.

59 The academic regulations for the award of foundation degrees, approved by HE Academic Board, together with accompanying policies, and procedures, and the Group's current operation on behalf of the respective awarding bodies and awarding organisation of robust regulatory frameworks, provides evidence that the Group is demonstrating its readiness to implement its own regulatory framework and academic regulations. The scrutiny team considers that LCCG has in place an appropriate regulatory framework to govern the award of its higher education qualifications.

Criterion B2

A further education institution granted foundation degree awarding powers has clear and consistently applied mechanisms for defining and securing the academic standards of its higher education provision, wherever, however and by whomsoever it is offered.

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)*

60 The Group delivers higher education programmes at levels 4, 5, 6, and 7 of the FHEQ. Requirements of awarding bodies and the awarding organisation are adhered to in respect of the structure, level-related and credit requirements for the award of specific qualifications. The FHEQ is referenced in regulatory frameworks and associated guidance. Alignment with the FHEQ and other external reference points was demonstrated through scrutiny of the internal and external stages of the respective validation/revalidation processes and documentation. Programme and module specifications, which are approved at the time of validation, are clearly referenced against the FHEQ.

61 The scrutiny team noted that LCC has introduced its own internal critical review process, which precedes external validation. This process requires programme teams to ensure that validation documentation considers external reference points such as the FHEQ and *Foundation Degree Characteristics Statement*, and that qualifications are positioned at the correct level within the FHEQ. Their application is also examined by the awarding body in the external validation process. The shadow regulatory framework and policies and procedures, including those for programme design and approval, are designed to enable the College to ensure that full account is taken of the FHEQ.

62 Adherence to the FHEQ is kept under review through annual monitoring processes and annual review reports, which draw on external examiner reports. Observations of internal and external validation events, and other internal processes, confirm that programme proposers and development teams and internal scrutiny panels demonstrate a sound understanding of the requirements of different HE levels. External examiners confirm in their reports that academic standards set for programmes and modules are aligned with the FHEQ.

63 The scrutiny team confirmed from examination of validation documentation that the Group's foundation degrees address the defining characteristics of an FD as described in

the FD Characteristics guidance document, such as employer involvement, accessibility, articulation and progression, flexibility, and partnerships. From the evidence provided by LCCG, and from observations and discussions with staff, the team confirms that the awards delivered by the Group correspond to the relevant levels of the FHEQ.

Management of higher education provision takes appropriate account of the UK Quality Code for Higher Education (Quality Code), relevant Subject Benchmark Statements, national guidance on programme specifications, and the requirements of any relevant professional and statutory bodies

64 The Group's current and prospective regulatory frameworks are aligned to the expectations of the Quality Code. The scrutiny team noted that HEDO and Academic Registry, respectively, ensure that when new policies are introduced or existing policies reviewed, mapping against the Quality Code is undertaken prior to approval at the HEQEC. All higher education policies and procedures are cross-referenced to the requirements of the Code. Policies are reviewed and adjusted incrementally to take account of the developing requirements of the Quality Code.

65 Programmes are developed in alignment with the Quality Code and are scrutinised at internal and external stages of validation. The team observed validation processes and saw documented examples of compliance with external reference points such as the Quality Code, and the requirements of Professional, Statutory and Regulatory Bodies (PSRBs). Documentation also includes mapping against the relevant Subject Benchmark Statement. The definitive record for higher education programmes leading to the awards of all partner organisations is the programme specification. From examples for each awarding body the scrutiny team confirmed that explicit reference is made to the FHEQ and Subject Benchmark Statements.

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

66 Though overall responsibility for ensuring that external expertise is used in the setting and maintenance of academic standards currently lies with the awarding bodies and Pearson, the Group draws on external advice and guidance in setting and then maintaining academic standards. All awarding body validation and approval panels include independent external peers.

67 The scrutiny team noted evidence that during programme and module design processes programme teams consult with external stakeholders, such as external subject specialists, employers, sector groups and, where appropriate, PSRBs. Consultation with employers was illustrated in the introduction of employment-related modules, and the inclusion of practice-related elements. However, the few employers met by the scrutiny team indicated no knowledge of or involvement in curriculum design, validation, or review.

68 Although the scrutiny team found evidence to confirm that such external consultation is taking place, there was some variability in the breadth of engagement with employers and in the use made by LCC of external academic peers in its own internal processes. The scrutiny team noted that programme managers have been informed by HEDO of the need to improve the level of employer engagement. Further, in considering the use made currently of external expertise, through observation of the Internal Critical Review stage of the programme approval process, the team noted that while internal externality is normally provided by a representative from an independent academic department, the external academic input is provided by the awarding body. The College does not include its own nominated independent external academic nominee in its internally devised approval process. The critical self-analysis stated that in preparation for foundation degree awarding

powers, the College was building 'a bank of external advisors which will replace the consultation previously undertaken with validating body link tutors'. Though the team noted evidence that ad hoc use is made of LCC-appointed external academics outside of the formal internal critical review process, no evidence was made available to demonstrate that progress has been made towards the proposed bank of external advisers (see paragraph 138).

69 The scrutiny team confirmed that external peers and, where appropriate, professional and statutory bodies and relevant employers are currently engaged in processes for establishing and maintaining the comparability of the standards of programmes of study. However, progress is required to ensure the involvement of external academic peers in the Group's own approval processes.

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

70 Programme approval follows awarding body processes and is underpinned by a developmental internal approval process. Awarding body procedures incorporate external scrutiny of the requirements of awards in terms of level and mode of delivery. The scrutiny team observed approval procedures in operation and confirms, from observation, discussion, and documentation, that these arrangements are understood by staff. The team did, however, note an occasion where policy on internal approval procedures had been contravened.

71 Programmes are subject to revalidation by validation bodies on a five-year cycle. The Group's own shadow periodic review cycle stipulates a six-yearly reapproval requirement. These procedures appear to be fit for purpose, though due to successive changes in awarding body and validation links in recent years, neither LCC nor LCoM has undergone recent periodic review. Consequently, the Group and its awarding bodies focus primarily on annual monitoring and review processes. These monitoring and review processes involve inputs from students, employers, and external examiners.

72 Though LCC and LCoM operate different processes for monitoring and reviewing their HE provision, matters relating to the standards at each level of award and to the quality of programme delivery are monitored annually for all Group programmes. At LCC this culminates in a Higher Education Annual Review, considered by HEQEC, which brings together evidence from student feedback, programme and module reviews, award and pathway meetings, annual peer review, and external examiner reports. Reporting to HEQEC on issues raised at pathway meetings is undertaken verbally. The annual review of Pearson programmes is conducted by LCC using the same processes. At LCoM, the annual review is undertaken through the validating body's Joint Board of Studies for which a Partner Quality Enhancement Report is completed. This is considered by LCoM Academic Council.

73 The scrutiny team noted that outcomes from the NSS provide a valuable external dimension to monitoring and review. Survey results are analysed at programme, subject, and institutional levels with any issues identified being factored into action plans at programme and institutional levels. Results of the NSS are also considered in deliberative bodies. The scrutiny team noted various examples of the effective use of monitoring and review procedures and confirms that these arrangements and processes work well and are understood by relevant staff.

74 The scrutiny team furthered their enquiries on monitoring and review in relation to different levels of awards by considering the use made of a 'special measures' process for programmes where performance is causing concern. From observations and documentary

sources the team noted that, as a result of the outcomes of the 2016 examination board cycle, a number of programmes were placed under special measures. This decision was recorded at HEQEC. Academic staff were unaware of any documented procedure. Senior managers confirmed that there is no formal institutional policy document in which the requirements and stages of a special measures process are described (see also paragraph 49).

75 The scrutiny team concludes that programme approval, monitoring and review arrangements are in place, are applied consistently, and incorporate an external dimension. However, the requirements and purpose of the special measures process and procedure are not fully documented nor made available to all relevant staff.

Where its programmes are delivered outside the college's own environment, appropriate and effective quality assurance mechanisms are used to ensure the maintenance of academic standards and quality

76 Work-related experience is incorporated in all foundation degrees at LCCG and in one programme at LCoM. To enable the scrutiny team to explore processes for managing, monitoring, and reviewing this provision, repeated requests were made over an extended period for opportunities to observe work-based learning and student placements and to interview staff, students, and workplace mentors. Observations were eventually undertaken during the later stages of the scrutiny process. It was not always possible for the observer to meet individually and in private with the tutor, mentor, and student.

77 Policy and practice and mechanisms for managing work-related learning is informed by a common Work Placement Policy, recently drawn up through the process for harmonising selected Group policies. While some LCC students receive a tutor visit, a remote oversight model for tutor supervision is operated. LCoM students undertaking the work-based learning Community Music module are only visited by the module tutor when there are concerns specific to a placement.

78 The scrutiny team confirmed that LCC has a range of handbooks and guidance documents designed to support students, tutors, and placement providers. Students whom the scrutiny team observed in placement settings confirmed the usefulness and clarity of information provided by their tutors, and the value of placements in enhancing their employability skills. Course learning outcomes are included in the Employer Handbook, but not the Mentor's Handbook. The latter does not mention risk assessment, tutor visits, or feedback requirements. The scrutiny team concludes that while mentors are invited to attend training sessions at LCC, the information contained in the handbook could be more extensive. Observation visits indicated that not all placement staff designated as a mentor are sufficiently informed of and trained for their role. Nor is the mentor required to evaluate their experience, or the effectiveness of the mentoring process. In one placement observed by a member of the scrutiny team, it was unclear which if any member of the placement provider staff had accepted or assumed the role of mentor. Nor was the manager/employer aware of any requirement to provide formal feedback to the College.

79 Information made available to placement providers indicates that risk assessments are required to be carried out, though the team was informed that these assessments are only carried out where possible, with the responsibility for assessment being determined by the level of risk at the workplace environment. The team also noted from Employer Handbooks that placement providers are informed that '...a tutor will visit where possible'. Tutors informed the scrutiny team that they did not have time or sufficient proximity to placements for them to be able to visit all students. The scrutiny team noted several programmes in which all students are engaged in work experience and where the cohort undertakes a placement, with assessment being linked to that placement, but where not all

students received a visit from a tutor. This inconsistency in the practice around tutor visits raises concerns as to whether those students who do not receive a tutor visit are benefiting from a learning experience and learning opportunities equivalent to those who do receive a tutor visit. It also raises concerns as to the overall effectiveness and reach of arrangements for monitoring the progress of each and every student in a cohort. The scrutiny team was interested to learn that LCC is currently undertaking a review of its work experience procedures. The outcomes of this review were not available during the period of scrutiny.

80 The scrutiny team noted that policy on work-related learning does not require placement mentors and employers/providers to be involved in the assessment of work-related experience. However, during one observation the mentor indicated to the observer that both she and the student understood that as part of the mentoring process there would be discussion of the student's assignment that fell due on completion of the placement. The mentor indicated that this would require access to both the student's assessment schedule and the related learning outcomes. This potential source of confusion in mentoring and supervision arrangements is compounded by the information contained in the Guidance to Tutors which states that where there is no mentor at a placement the tutor will act as mentor. Given that a tutor-mentor would have direct access to assessment-related information this appears to indicate scope for inconsistency in the learning experience between students in the cohort (see also paragraph 222).

81 The team was informed that HEDO does not exercise quality assurance oversight of the operation of work-related learning arrangements since this responsibility is delegated to the course team. Programme teams are required to respond to employer feedback on work-based learning and placement learning in their annual reviews. Institutional level reporting on the quality of placements and work-related learning appears to be limited to the overall annual review of the performance of higher education programmes. While work-related assessment outcomes are monitored at examination boards, there is no procedure for an annual or periodic report on the quality and standards of work-related learning, a significant element of LCC's vocationally oriented higher education provision.

82 The scrutiny team concludes that where some part of a programme is delivered outside the College's environment in a placement setting, there are deficiencies in processes and mechanisms for managing, monitoring and reviewing this provision which may lead to variability in learning opportunities and a lack of equivalence in the student learning experience.

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

83 Governance bodies play an important role in academic planning and decisions on the resourcing of academic provision. Through observation, from documentation, and through discussion, the scrutiny team confirms that the Board of Governors and Academic Board exercise effective oversight of resourcing in relation to academic development and the student experience.

84 In reviewing the relationship between academic planning and decisions on resource allocation, the scrutiny team noted changes made to strengthen financial planning and resource allocation. A new business planning and performance review process has been introduced. A key strategic objective is to consider academic planning and the resourcing of new and continuing programmes of study, and to ensure that resource allocation is responsive to the performance of academic departments. The scrutiny team confirms that these arrangements have the potential to strengthen the curriculum-planning process and decision-making on the student experience.

85 For LCC provision, following initial senior management consideration of proposals for additions to the portfolio of study programmes by the LCC ELT, both the business case and academic case are critically reviewed, the latter using the College's internal process. For LCoM programmes, following internal approval of the business case, University of Hull procedures are followed.

86 Observation, institutional documentation, and discussions with staff at all levels, indicated to the scrutiny team that the curriculum-planning process ensures that planned curricula are adequately resourced. Programme teams are required through the programme proposal and approval processes to identify resources necessary for delivering the programme. This takes place at both the initial programme proposal stage and during the validation meeting with the awarding body. Programme teams are required to liaise with library and student support staff and to ensure that learning resources are purchased prior to commencement of programme delivery. The team confirmed that these links work well.

87 The scrutiny team noted processes whereby programme-related resources are reviewed annually. Support services attend the HEQEC periodically to review support and equipment needs. The team also noted evidence of responsiveness to students' resource-related requests for improvements to the learning and studying environment.

Criterion B3

The education provision of a further education institution granted foundation 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

88 The learning and assessment strategies developed by curriculum teams are designed in accordance with institutional policy on learning and teaching. The scrutiny team confirmed that policy is aligned to institutional academic objectives, and addresses characteristics of foundation degrees, such as the work-related element.

89 At programme and module level, learning, teaching and assessment strategies and their relationship to intended aims, objectives, and learning outcomes are subject to thorough scrutiny during the validation and programme approval process. This is carried out during internal and awarding body processes and is designed to ensure that students are provided with the opportunity to achieve intended learning outcomes. Modules are mapped against level outcomes, providing a further mechanism for ensuring that students have appropriate achievement opportunities. HEDO provides training on writing learning outcomes. Academic staff make effective use of programme specifications which contain a clearly defined assessment strategy and identify the methods by which learning outcomes are assessed. Observations, discussions with staff and students, and scrutiny of documentation confirm the effectiveness of these arrangements.

90 Learning, teaching, and assessment strategies are monitored through the annual planning process where they are scrutinised to ensure that they remain relevant to the student experience. The Group has in place its own policy and procedure for periodic review through which these strategies will be reviewed should the application for FDAP be successful. Relevant staff are informed of, and provided with guidance on, its policies and procedures for programme design, monitoring and review.

91 Designated staff of HEDO at LCC and the Academic Registry at LCoM, respectively, are responsible for ensuring that staff are provided with information and

guidance on LCCG's and partners' policies and procedures for programme design, monitoring and review. The scrutiny team noted that all programme teams are provided with standard documentation and guidance. LCC programme teams receive an annual calendar, which provides information on central and local quality assurance events and activities, including module reviews, programme team meetings, the preparation of annual reviews, examination boards, and committees, while LCoM staff receive a meetings schedule.

92 Programme development teams receive training and staff development prior to commencing the development stage of planning a new programme. Support is also available during the various stages of the programme approval and validation processes and subsequent programme modification. Development activities in relation to programme design and approval also enable staff to develop awareness of monitoring and review processes. The scrutiny team confirmed that staff development activities across the Group enable staff to be made aware of external requirements in relation to academic standards and the quality of learning opportunities, as well as providing additional opportunities for reflection on internal procedural and policy requirements.

93 The scrutiny team's observations of programme approval and validation events, monitoring, review and planning meetings, and committee proceedings at various levels, indicated that the policies and procedures are embedded and understood by relevant staff. The scrutiny team confirmed that documentation, support and guidance, and information made available at centrally and locally delivered events, provide new and experienced staff with extensive opportunities for accessing and understanding the various policies and procedures for programme design, and for programme monitoring and review.

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

94 Programme and module reviews enable changes to be made to programmes during their validation and approval period. Within the Group, there is senior level consideration of proposed changes to programmes, prior to submission to the relevant awarding body. A key reference point for amendments to programmes, and the definitive record for programmes awarded by validating partners, is the programme specification. Changes to the approved programme specification undergo a formal process overseen by HEDO at LCC, and the Registry at LCoM. The approved version is held by the awarding body and is made available to staff and students at LCC and LCoM on their respective VLEs.

95 For programme modification, the respective university awarding bodies employ differentiated processes for major and minor change. Each requires the involvement of external examiners. For Pearson programmes, LCC has delegated responsibility for approving changes within broad parameters set by the awarding organisation. To date, no changes have been introduced for Pearson provision or for OU provision.

96 At LCC, policy and guidance documentation clearly assigns roles and responsibilities for programme amendments. Minor modifications are subject to a relatively short process through approval by an internal modifications panel. For LCoM programmes, changes are considered by the Academic Council then forwarded to the University of Hull with the updated programme specification for formal approval. Programme drift resulting from cumulative minor changes is prevented through tracking of minor changes by HEDO at LCC using a modifications tracker and through oversight by the University of Hull for LCoM awards. For major modifications the processes are largely the same as for programme approval.

97 Having reviewed the documentation specifying responsibilities for amending programmes, and observed the work of the internal modifications panel, the scrutiny team confirms that responsibilities are clearly defined and are understood by relevant staff. The

team saw evidence of active involvement of the awarding body, and of internal and external processes for programme modification being implemented consistently.

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

98 Where a proposed programme is designed to provide alternative pathway options, mapping is undertaken during the preparation of validation documentation. This is designed to ensure that learning outcomes are achievable by students and that there is consistency in learning and assessment strategies. These mapping documents are scrutinised during the approval process, with a view to securing consistency of programmes with multiple pathways. This approval stage incorporates a review of each pathway option to ensure coherence of, and alignment between, assessment and learning and teaching strategies, and that programme outcomes reflect programme aims and title. At LCC, a software package is used post-validation to monitor the overall student profile.

99 The scrutiny team confirmed that LCoM programmes are structured to enable flexibility within modules and student choice. Programme structures ensure that programme and module intended learning outcomes can be met. Monitoring and review, and use made of management information such as student feedback, external examiner comments, and student performance data, ensures continuing coherence of provision. At LCC, processes include a system of pathway committees that enable staff to undertake monitoring and review through the year, with verbal reports being made to HEQEC.

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

100 The Group's academic planning arrangements incorporate formal links to enable learning support services' involvement at various stages of programme development and approval. Learning support managers provide input into internal validation and critical review processes and university validation/revalidation events. At the programme proposal stage programme teams are required, in consultation with their link librarian, to consider any additional resources needed. The scrutiny team confirms that validation documentation includes details of student support arrangements and also a statement from the library to verify that appropriate resources are in place.

101 Formal links also provide for involvement of learning support services in the monitoring and review of programmes. Observations of Award and Pathway Committees confirm that learning support and learning resources are incorporated in programme annual reviews and associated action plans, which are discussed at Award Committees, and in annual planning, when a learning support services representative is present. Learning support services are represented on the HEQEC and Academic Council when new course proposals are under consideration, and are able to advise on library or IT matters and any potential student support issues that are evident at that stage. Representation continues post-validation, enabling learning support services' involvement in the ongoing monitoring of provision by higher level deliberative bodies.

102 The scrutiny team confirms, from documentary study, from observations, and through discussion with senior managers and academic and support staff, that effective links are maintained between learning support services and the Group's programme planning, approval, monitoring and review arrangements.

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

103 During the period of the scrutiny LCCG confirmed that no programme, or any part of a programme, is delivered on a distance learning basis.

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

104 The Group is required to comply with the academic frameworks of the respective awarding bodies, though internal processes are in place for the design and approval of modules and programmes prior to submission to those bodies. Programme design and curriculum development are informed by external reference points such as the FHEQ, qualification benchmarks and characteristics and Subject Benchmark Statements, PSRB requirements, validating body requirements, and the Group's own regulations, policies and procedures.

105 The scrutiny team confirms that validation and approval processes require external and internal scrutiny of programme learning outcomes, the appropriateness of assessment activities, and the appropriateness of module learning outcomes for different levels. Procedures for programme modification between review and revalidation are as described under Criterion B3 (paragraphs 94-97). These approval and review processes indicate that academic standards are set at an appropriate level and that internal College processes support the maintenance of these standards in accordance with awarding body requirements.

106 Academic regulations, policies, and procedures address assessment matters such as pass marks, grading and classification of awards, academic misconduct, mitigating and extenuating circumstances, academic appeals; verification and moderation of assessment tasks and assessment outcomes; and operation and management of examination boards. The Group is required to use the procedures and assessment regulations of its awarding bodies for the design and approval of assessments.

107 The scrutiny team confirmed that the annual review processes used across the Group address issues relating to academic standards. Annual programme review templates require programme and curriculum teams to reflect on assessment practices, student achievement, and external reports. Review and evaluation is supported by data provided, respectively, by HEDO and Registry. Institutional-level data on programme performance, student achievement, and assessment outcomes across all Group higher education provision are considered in a timely and effective manner by HEQEC.

108 Observation of meetings, and documentation on annual monitoring confirmed that academic standards at both LCC and LCoM are considered through the LCC Higher Education Annual Review and the LCoM Partner Quality Enhancement Report (PQER) processes, each of which includes discussion of external examiner reports. External examiners, and external peers involved in approval and validation processes confirm their satisfaction with academic standards. Where their reports contain recommendations for enhancing assessment practices, systems are in place to ensure that these are responded to in a transparent manner by heads of curriculum areas. Higher level deliberative bodies are therefore able to assure themselves that threshold academic standards are being maintained.

Assessment criteria and practices are communicated clearly to students and staff

109 Assessment-related requirements are explained in comprehensive student-facing documentation and are available through the VLEs. While there are internal policy

documents and handbooks, the assessment of all HE programmes is undertaken in accordance with awarding body and awarding organisation procedures and regulations. For Pearson programmes, the awarding organisation sets out expectations for assessment, which LCC has interpreted through its Assessment and Moderation Handbook. The various Group academic regulations are available on the respective websites along with links to the regulations of the validating universities and awarding organisation.

110 Programme teams make use of a standard induction checklist when discussing assessment matters with students. Tutors explain assessment requirements to students during induction. At the commencement of each module, students receive the module handbook and are directed to all relevant module information, including arrangements for the submission of assessed work. Assessment regimes are outlined in programme specifications and in programme handbooks, which are made available via the respective VLEs. Programme handbooks include general assessment criteria.

111 Information for staff on their responsibilities in assessment matters includes guidance on assessment design; marking, grading, and moderation; examinations; APL; academic malpractice; mitigating circumstances; feedback to students; and assessment records. For LCoM programmes, academic staff follow University of Hull guidelines with regard to assessment and moderation practice. This written guidance is supplemented by induction sessions for staff new to higher education, ongoing staff development, and also briefing sessions for students, all of which supports implementation of policies and procedures.

112 The awarding bodies and Pearson provide assessment grading criteria and grading descriptors that are used in the marking of students' work. Students confirmed to the scrutiny team the usefulness and accessibility of information. Assessment briefs are clear and fully explained, along with intended learning outcomes and assessment criteria. Students confirmed that they understand grade boundaries and how their awards will be classified. In some programmes, assessments are submitted online via the VLE, thereby enabling the use of plagiarism-detection software. Programme and student handbooks make explicit reference to plagiarism and academic malpractice. Students confirmed that the rules on good academic practice are made clear to them at the beginning of their studies. This is reinforced by staff from HEDO and LCoM Registry respectively.

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

113 For all qualifications and levels, assessment practices, including mode of assessment, amount and scheduling, are detailed in the assessment strategy. The assessment of intended learning outcomes at programme and module level is scrutinised during LCC's internal critical review process and in the validation/revalidation and programme approval processes operated by the awarding bodies. Assessment plans are reviewed through the annual planning process. These processes confirm that the overall assessment strategy for the programme and practices within all modules are appropriate and reflect mode of delivery, and that the assessments enable learning outcomes to be met. Observations and meetings with students confirmed their appreciation of opportunities to complete assignment activities related to work-based environments.

114 The scrutiny team noted that, in accordance with assessment policy, learning outcomes are stated in programme and module programme specifications. The team confirmed that effective use is made of programme specifications, which identify the methods by which learning outcomes are assessed. Module specifications provide detailed information on the assessment strategies for each module, and learning outcomes are mapped onto assessment components.

115 Programme teams set assessments for all externally validated programmes. For Pearson provision, LCC staff design assessment tasks in accordance with generic learning outcomes that are set by the awarding organisation. The scrutiny team confirmed that assessment briefs provide students with appropriate information regarding the relevant learning outcomes and the assessment criteria. Standardised assessment and feedback templates enable learning outcomes that are to be assessed to be clearly identified, and for students to receive feedback against each of the outcomes. Students confirmed to the scrutiny team that they understood all of these arrangements and indicated that the information they receive is fit for purpose.

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

116 Senior LCCG staff and programme managers identify possible candidates for the external examiner role for university-validated programmes and make recommendations to the awarding bodies who approve and appoint suitable candidates. The Pearson awarding organisation makes appointments for its provision. LCC is responsible for the induction of external examiners and an online induction programme enables external examiners to undertake training via the VLE. For LCoM programmes, the University of Hull makes the arrangements for induction.

117 Input from external examiners is secured through the operation of external examining processes that fulfil awarding body requirements and which ensure that external and internal moderation and verification takes place. Assignment briefs and assessments are internally and externally moderated. These processes identify how intervention by external examiners is used to ensure academic standards are being maintained. Where potential differences arise with an external examiner, these are resolved through reference to the academic regulations to clarify the regulatory guidance and correct application of the prevailing regulation. The scrutiny team noted an example of the effectiveness of this procedure.

118 External examiners attend examination board meetings and produce annual reports. Documentation and meetings with staff confirmed to the scrutiny team that external examiners are provided with appropriate assessment materials that enable them to verify that academic standards are being met. The team also noted that, even though validating bodies only require external examiner input at levels 5 and 6, LCC voluntarily uses externals at level 4. The scrutiny team noted the importance of this for academic staff new to higher education, and that this provides reassurance that academic standards are being maintained.

119 Observation, documentation, and discussions with senior managers and staff, confirmed that processes and mechanisms are operated for engaging external peers in assessment processes. Scrutiny of external examiner reports and how they are acted upon demonstrates that extensive use is made of suitably qualified peers to assure academic standards and to enhance provision. The Group has developed its own regulations governing the appointment, induction, role, rights, and responsibilities of external examiners should its FDAP application be successful.

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

120 Assessment procedures are set out in the regulations, policies and procedures of the Group's validating universities and in internal regulatory frameworks and policies. Consistency of implementation is supported through staff development activities, and the use of standardised documentation and agendas. Oversight of assessment is through

external examiners appointed by awarding bodies and Pearson. Assessment procedures are kept under review by the Group's higher level deliberative committees. The Group stated that these processes are robust and that resulting assessment decisions ensure that academic standards are maintained. External examiner reports are positive and confirm the standards of awards are comparable with other UK HE providers. They also comment positively on the soundness and fairness of assessment procedures, and indicate that boards of examiners' meetings are conducted in accordance with awarding body procedures; awarding body representatives are in attendance.

121 The Group operates module and examination boards that monitor the performance of students. These are facilitated by HEDO staff at LCC and by Registry at LCoM who, respectively, undertake to ensure that there is fair and consistent application of academic regulations. The administration of boards is supported by Registry administrators who prepare spreadsheets for programme teams to use for the purpose of recording module results in advance of board meetings. These are checked at the pre-board stage and displayed electronically at examination boards. The scrutiny team confirms that these boards are professionally administered and make effective use of assessment data. Observations of module and award boards enabled the scrutiny team to confirm that the performance of individual modules across the higher education provision is effectively monitored, and that programme teams are required to review modules with below average performance. Actions are recorded in the programme annual review, and may result in changes to assessment methods.

122 The scrutiny team observed proceedings of pre-boards. This system is operated with the intention of ensuring that information presented to examination boards is accurate and reliable. Documentation states that all LCC programme teams are required to undertake a pre-board with the HE Academic Registrar and HE Registry Coordinator to ensure that data is correct and to resolve any problems or issues that may arise. However, in the case of one pre-board, for one subject area the department was not represented. This was repeated for the same department at the Mitigation Panel held two days later, with the result that a number of cases of mitigating circumstances could not be considered. This represented consecutive breaches of regulatory and procedural requirements. The scrutiny team concluded that the interests of those students whose progression issues and mitigating circumstances applications could not be considered were not well served by the absence of any representation from the department concerned.

123 At each of these events, and at subsequent Joint Module Assessment and Progression and Awards Boards, senior officers expressed serious concerns at the high level of applications for mitigating circumstances and the number of late and back-dated applications, in contravention of the regulatory requirement that such applications should be submitted within two weeks of the point of assessment. These boards also recorded concerns regarding the high level of reassessments in several programmes, some of which were subsequently placed under special measures.

124 The scrutiny team confirms that the reliability and validity of assessment procedures are monitored and that assessment outcomes inform future programme planning. However, implementation of procedures does not always result in full compliance with policy requirements and has the potential to put students' interests at risk.

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

125 The critical self-analysis states that the process of closing a programme requires that students and external examiners are consulted with regard to the withdrawal of modules, and that the procedures are designed to ensure that the interests of current and

prospective students are secured through making arrangements for 'teach out'. However, the scrutiny team noted that the relevant LCC documentation does not specify these requirements. The team noted evidence that when LCC changed its validation partner from Leeds Beckett University to Teesside University and subsequently to the OU, appropriate arrangements were made to protect the interests of students through the adoption of 'exit' and 'teach out' strategies designed to ensure that students have opportunities to complete their programme of study with the outgoing validating body.

126 Observation and review of documentation enabled the scrutiny team to consider the process and procedures followed on the closure of an academic department. Observation of examination board proceedings enabled the scrutiny team to confirm that the external examiner was satisfied that students' interests had been safeguarded throughout each stage of the process and that the programme team had made appropriate arrangements for students to complete the final year of their foundation degree. In a further case, where a decision had been made jointly by HEDO and the head of the relevant curriculum area to withdraw a foundation degree programme, the scrutiny team notes that the decision to close the programme was reported in the deliberative committee structure. Arrangements were also made to 'manage out' students up to the completion of their studies. However, the team was informed that despite the College's best efforts it had not been possible to obtain the view of the external examiner on this matter, despite this being a regulatory and procedural requirement. The awarding body's external examiner report for the programme makes no mention of the withdrawal of the programme.

127 The scrutiny team confirms that mechanisms are in place for closing programmes and for safeguarding the interests of students. Other than that, there are no measures in place to ensure that procedural and regulatory requirements are adhered to consistently.

Criterion B4

A further education institution granted foundation 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

128 Self-assessment and self-reflection are evident in a number of institutional processes. Approval and validation ensure that proposals are scrutinised at successive stages. Annual and ongoing monitoring processes are embedded and entail scrutiny at all stages. Clear processes are in place for reflecting on and responding to the reports of external examiners. This includes institutional-level reporting on issues raised by external examiners for consideration by HEQEC. Award and Pathway Committee meetings draw on evidence from external examiners and other external reference points. While the exact process for gathering evidence varies between LCC and LCoM, in both cases evidence feeds into annual self-assessment. Programme and module reviews use standard templates. Academic staff are required to be reflective and self-critical when reviewing the modules for which they are responsible. Module reviews are monitored by the programme manager (LCC) or curriculum leader (LCoM) and inform the programme annual review.

129 The scrutiny team confirmed that programme-level annual reports are self-critical and are central to the process of monitoring academic quality and standards across the Group. These are informed by data on student progression and retention, and also student and external examiner feedback, and plans for the forthcoming year in the form of action plan points. The use made of management information has been identified as good practice externally, and key performance indicators are in place that enable underperformance of

programmes to be monitored by HEQEC on behalf of Academic Board. As part of the overall annual review process at LCC, an annual peer review system is in operation that provides for triangulation of quantitative and qualitative data used in other annual reporting processes. Findings and outcomes are reported to HEQEC and the HE Academic Board. All programme reviews are monitored by HEDO and form the basis for the Higher Education Annual Review report which is received at HEQEC.

130 The scrutiny team confirms that critical self-assessment is evident at all levels and that LCCG is responsive to matters raised through monitoring and review. However, as noted in paragraph 52, there is scope to strengthen the functioning of higher level deliberative committee meetings by facilitating more effective reporting from lower level committees and also by ensuring greater opportunities for academic debate on matters raised on the agendas of these meetings. Clear mechanisms exist for assigning and discharging action in relation to the scrutiny, monitoring and review of agreed learning objectives and intended outcomes.

131 The responsibilities of programme teams and heads of subject areas and pathways are specified in policy, procedural, and regulatory and quality assurance documents, as are the responsibilities of deliberative committees such as HEQEC and Academic Council.

132 Programme teams are required to identify learning objectives and intended learning outcomes, and to determine how they will be assessed. This is achieved through an outcomes mapping process whereby assessment activities are mapped against the learning outcomes approved through internal and awarding body processes. Learning objectives and outcomes at programme and module level are monitored and reviewed through annual programme monitoring. The team confirms that academic staff on Pearson and non-Pearson programmes make effective use of programme specifications for identifying the methods by which learning outcomes are assessed. The team also confirmed that the mapping process for learning outcomes is aligned with a clearly defined assessment strategy.

133 The assessment of learning objectives and intended learning outcomes is monitored post-validation through external and internal moderation processes through which assessment and assignment briefs are scrutinised to ensure that they allow students to achieve the intended learning outcomes and objectives. Responsibility for taking actions is evidenced in detailed action plans drawn up through annual review and annual planning and monitoring processes. Where changes to learning outcomes are identified through annual monitoring, these can be progressed through minor and major modification procedures.

134 From observations and meetings with staff the scrutiny team confirms that responsibilities are understood by those concerned. The LCC annual planning and monitoring event is a robust process whereby learning outcomes at award and module level are reviewed alongside learning and assessment methods. Outcomes of these deliberations are taken forward to a Modification Approval Board which leads to the updating of programme and module specifications and module handbooks.

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

135 While ultimate responsibility for ensuring the involvement of external expertise in programme design, approval and review rests with awarding bodies and Pearson, the Group fulfils its responsibilities through compliance with their programme approval and review processes. These processes involve external panel members.

136 The scrutiny team noted the requirement in the programme approval processes that programme teams must confirm that the programme has been designed in accordance with external reference points and has taken into account input from external examiners, professional bodies and employers. In confirming this, the scrutiny team saw examples of the validation and programme design process, in which the Group drew on external expertise from professional bodies and academic subject experts. At LCC a programme approval proposal is completed that makes explicit reference to Subject Benchmark Statements, professional body requirements and National Occupational Standards. At LCoM the Record of Recommended Decision confirms the adherence of the programme to the University of Hull regulations and external reference points.

137 Both LCC and LCoM seek engagement with employers to ensure programmes meet current curriculum expectations. The scrutiny team noted that modules and programmes are designed and developed based upon skill needs identified through links and consultation with employers, and that industry-facing advisers and sector bodies also have input to the process. This consultation is scrutinised at the validation event.

138 Though course approval responsibility is currently assumed by the validating universities, the Group considers itself to be equipped and ready to assume this responsibility. In broad terms, the scrutiny team endorses this view. In developing its approach to quality and standards, the Group has benefited from its relationships with its validating universities, with academic peers and advisers provided by those universities, and with its industry contacts. However, as noted in paragraph 68, progress has yet to be made in fulfilling the stated commitment to build a bank of external advisers to replace the expertise provided by validating body links.

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

139 The Group's commitment to the continuous improvement of its higher education provision and its strategic approach to the improvement of student achievement is set out clearly in the LCC Higher Education Strategy and Learning and Teaching Policy, and in the LCoM Strategic Plan and Learning, Teaching and Assessment Strategy. The Group's infrastructure includes support services that facilitate student development and achievement. The Group's quality assurance processes incorporate self-evaluation and self-critical reflection and external peer input, and result in improvement-oriented action planning that is monitored at appropriate levels. These processes are augmented by the timely provision of high quality data that is monitored on an ongoing basis through deliberative committee processes.

140 The scrutiny team noted a range of institutional factors that indicate evidence of the Group's focus on the enhancement of higher education. These include relationships with awarding bodies that result in devolved responsibilities for quality assurance and enhancement and provide opportunities to exchange good practice; an estates strategy that focuses on providing an appropriate environment for delivering higher education; a commitment to inclusivity; and an ethos of enhancement and improvement factored into staff induction and professional development.

141 LCC and LCoM both have a clear annual cycle of monitoring and review. The LCC Higher Education Annual Review is strategic, with an emphasis upon retention, progression and completion. HEDO produces a spreadsheet detailing the performance of every HE programme. This forms part of the Higher Education Annual Review and is reported to Academic Board. This enables scrutiny of both improvement and underperformance. For LCoM programmes, the annual review is conducted through a Programme Annual Monitoring Report and Partner Quality Enhancement Report process prescribed by the

awarding body. These are considered by LCoM Academic Council with onward reporting to Academic Board.

142 Various aspects of the student lifecycle are used for the purpose of improving and enhancing the quality of provision and student achievement. These include enrolment and induction feedback; inter-semester and end of programme reviews; staff and student peer review meetings; and Award and Pathway meetings. Key performance indicators relating to student recruitment, retention, and achievement are updated monthly and reviewed at meetings of HEQEC and Academic Boards. These reports, which include LCoM performance data, enable trends to be identified and action taken for improvement purposes.

143 The scrutiny team confirms that such processes provide appropriate mechanisms for encouraging the continuous improvement of quality of provision and student achievement. They enable the Academic Board at LCC, the Academic Council at LCoM, and the awarding bodies, to assure themselves that review processes are used to identify opportunities for improvement and that action in relation to identified areas for improvement is monitored through a comprehensively deployed action planning process and tracking system. A summary of key information focusing on student achievement and the quality of provision is received by ELT and the Board of Governors.

C Scholarship and the pedagogical effectiveness of academic staff

Criterion C1

The staff of a further education institution granted powers to award foundation degrees will be competent to teach, facilitate learning and undertake assessment to the level of the qualifications being awarded.

Academic and/or professional expertise

144 The LCC HE Strategy states the aim to foster a systematic approach focused on both subject scholarship and pedagogic excellence to ensure that HE academic staff are competent to teach, facilitate learning and undertake assessment to the level of the qualification being awarded. The mission and vision for HE Statements set the ethos whereby all HE staff are focused on the need to contribute to the College in terms of outstanding performance; creating a culture of research and experimentation; and as a leading vocational, intellectual and creative resource for the communities it serves. The mission of LCoM is to enable the students to become creative, confident and versatile practitioners in their chosen fields, producing high quality musical activity and music education, with world-class facilities.

145 Analysis of the staffing spreadsheet indicates 70 per cent of the academic staff are full-time and 30 per cent are part-time employees. However, scrutiny of the LCoM HE staff qualifications spreadsheet and the LCoM website indicates of 128 academic staff, 88 per cent (113 staff) are part-time and 12 per cent (15 staff) are full-time.

146 The high proportion of part-time LCoM academic staff is to enable provision of an extensive variety of skills, both academic and practical, instrumental and vocal within the College. The full-time Curriculum Leaders supported by the Curriculum Coordinators manage the Curriculum or Pathway teams. Additionally, three per cent of the part-time staff are on zero hours contracts in order to advertise certain rare and specialist expertise (for example, a Bassoon tutor), should they be required for the benefit of the students.

147 The Group requires that academic staff are appropriately qualified to teach on foundation degree programmes and that staff be qualified to a level above that which they teach. At the time of the scrutiny, analysis of qualifications revealed that within the Group, three per cent of the academic staff do not have that level of formal qualification. Within LCC, staff are teaching at level 5. At LCoM staff are teaching instrumental or vocal skills and have extensive practical experience that LCoM considers a valid alternative to a relevant formal qualification. All CVs sampled were detailed and scrutiny indicated a variety of educational and professional expertise across the Group.

148 Scrutiny of recorded Group qualifications revealed that of academic staff, 29 per cent hold a master's degree and 14 per cent a doctorate, with 12 doctorates held by six LCoM academic managers and six across LCC. Fifty-four per cent of academic staff hold relevant professional qualifications and 78 per cent a teaching qualification. In one programme all staff hold professional qualifications but no higher degrees, although some are working towards a higher degree. In another, where all staff are part-time, all hold professional and teaching qualifications and 60 per cent a higher degree. These figures, however, do not include LCoM part-time academic staff who make up 85 per cent of the teaching contact with students. Not all part-time staff records are complete, but from the data available, the highest degree achieved by LCoM staff is doctorate at 12 per cent and master's at 20 per cent.

149 All new staff undergo a general LCC or LCoM induction programme and a rigorous HE induction that includes a development session from the Course Manager, a mentor to advise and supervise, a peer observation within the first few weeks and monitoring for one year. Staff met by the scrutiny team advised that the process was thorough and informative.

Engagement with the pedagogic development of their discipline (through, for example, membership of subject associations, learned societies and professional bodies)

150 LCCG is an institutional member of the Higher Education Academy (HEA) through the accreditation of Developing Excellence in Learning, Teaching and Research (DELTA) programme and the Group HE Continuing Professional Development (CPD) scheme.

151 Analysis of staff records demonstrates engagement with the pedagogic development of their discipline and scrutiny of staff profiles reveals that within five programme areas nine staff (10 per cent) are fellows or senior fellows of HEA. The data also shows 15 per cent membership of the Institute for Learning, 12 per cent subject association membership, 31 per cent membership of a professional body and 26 per cent unspecified pedagogic activity. There is no learned society membership. The scrutiny team found this engagement to be more concentrated in a few curriculum areas and sparse in others.

152 In its HE Strategy, LCC states its aim to develop a research profile through scholarly and pedagogical activities that will underpin the growth, development and strategic management of higher education. It aims to deliver a staff development programme in order that the College is prepared for increased responsibility, supports staff in scholarly activity and monitors the impact upon learning and teaching, and promotes membership of HEA. Monitoring the impact of the new HE CPD scheme is through HEDO. The DELTA programme ran for the first year as a pilot followed by the requirement for all academic staff to engage. To facilitate this, attendance during the 2016 HE Sharing Good Practice Day was mandatory. The majority of staff enrolled in the first module plus the 12 staff, including support staff, who had previously completed this, worked on another module. Analysis of the staff profiles of 2014 and 2017 indicates an increase in engagement with the pedagogic development of their discipline through membership of HEA and other professional

associations, of less than three per cent. Given the HE Strategy aim stated above, the scrutiny team considered this to be less than might have been expected over three years.

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

153 Analysis of LCCG outputs of research and scholarly activity taken from the staff profiles indicates the proportion of staff producing outputs indicative of scholarly activity regarding engagement and production of articles as 15 per cent, book chapters as six per cent, books as three per cent, conference presentations as 19 per cent, and 'other' (unspecified) as 30 per cent. These figures do not include LCoM part-time staff. Within six curriculum areas there is no specific engagement recorded although 40 per cent of one of these staff record other 'unspecified output' (see also paragraphs 159-162). Across curriculum areas of LCoM, 73 per cent of full-time managers are actively involved in publications and presentations. One area of LCC shows 67 per cent of staff who publish and present at conferences.

154 Research and scholarly activity of team members is considered through the approval and validation process where teams are required to describe the activities they are engaged with and discuss how these are used to develop teaching and learning. The LCC programme teams confidently discussed with the scrutiny team the various activities in which they were involved.

Opportunities for accessing relevant employment experience and studying the implementation of relevant and up-to-date professional practice

155 Professional practice is maintained in a number of ways across the provision and recorded and monitored through HEDO at LCC and the Human Resources department at LCoM. The LCC staff support and review system has assisted staff with external professional opportunities, conference attendance, sponsorship to study for higher qualifications, professional qualification opportunities and, via teaching remission, time. During meetings with the scrutiny team, academic staff conveyed a range of successful opportunities that have widened their experience and expertise.

156 Analysis of staff profiles indicates a high engagement with employment experience and up-to-date practice across the Group. All LCoM staff are required to be in practice relevant to their area of music and have current employment experience. The staff curricula vitae confirm wide and current experience both nationally and internationally and the LCoM programme of events includes ongoing alumni contact with performers within the industry. Within LCC one member of staff is on secondment; 19 have current employment experience; 10, from two curriculum areas, are involved in creative work; six are consultants; 13 are in professional practice; and 41 in some other relevant activity. Overall, the scrutiny team confirms a high degree of engagement in employment and professional practice.

157 Within LCC, 19 teaching staff have current employment experience; 13 are in professional practice; 10, from two curriculum areas, are involved in creative work; six are consultants; and one member of staff is on secondment. Forty-one staff are in some other relevant activity.

158 During programme approval and validation observations, the programme teams demonstrated that their expertise and experience are current and relevant and sufficient to competently deliver the curriculum. Across the Group a range of programme validation was approved during 2016. The scrutiny team confirms from observation that teaching staff have the necessary current relevant experience and expertise.

Staff development and appraisal opportunities aimed at enabling them to develop and enhance their professional competence and scholarship

159 The Group has a commitment to CPD with appropriate mechanisms for the identification of professional development opportunities. The staff appraisal process is predominately used to identify and agree professional development requirements. The annual self-assessment review of service provision also provides an opportunity to review professional development needs across teams. Professional support staff attend staff development days and HE Sharing Good Practice Days.

160 Professional support staff are able to access financial support for personal and professional development, including attendance at conferences, external training programmes or academic study (usually at master's or doctoral level). There are also opportunities for professional support services staff to seek professional qualifications or membership (such as Chartered Institute for Library and Information Professionals) and be a guest lecturer at the College. Staff are encouraged to maintain a record of the CPD and the template is designed to encourage staff to reflect upon how the CPD activities have had an impact on their professional practice. At Group level, LCCG maintain staff qualification trackers (for academic and professional support staff) which records previous and ongoing professional development activity.

161 Staff met by the scrutiny team confirmed that they were clear on how and where to apply for funding for professional development activities and spoke positively to the team of the range of opportunities available to them.

162 Analysis of the Group staff profiles indicates a high engagement in staff development opportunities. In LCoM, seven of the 15 academic managers hold a master's or doctorate with one master's currently being undertaken. Within LCC, nine staff members are working towards a master's and five towards a doctorate, which represents 15 per cent of the academic staff. In addition, 70 of the 93 staff are studying other activities that the College considers meets the aim to develop and enhance their professional competence and scholarship. The team confirms that academic staff engage with the staff development opportunities available.

Experience of curriculum development and assessment design

163 The Group has a wide experience of curriculum development and design with a number of validating bodies and has used this experience in developing its own programme approval, monitoring and review procedures. Several LCCG programmes were designed and validated in summer 2016 during the transfer of awarding body from Teesside University to the Open University, which the scrutiny team observed. The validation panels gave constructive advice on aspects of approval documents that required amendment. Eighty per cent of the Group academic leaders and 67 per cent of academic staff are experienced in curriculum development and assessment design.

164 In an LCoM all-staff presentation observed by the scrutiny team, a Module Leader discussed making assessment methods relevant to the current generation of students through the use of technology such as social media. Curriculum development and assessment design was undertaken in complete Pathway teams through thorough discussion as part of the LCoM Undergraduate Staff Development. All part-time LCoM academic staff were present for the staff development event to plan alongside the full-time Curriculum Leaders and Coordinators. The scrutiny team confirmed the activities to be both relevant and professionally conducted and conform to the LCoM Assessment Strategy of a design stage that ensures benchmarking against pedagogic research and industry practice.

165 All academic staff new to higher education receive training on HE assessment regulations, and experienced staff have opportunities to repeat and review the training. Programme development teams receive training, and staff development activities in relation to programme design and approval also enable staff to develop awareness of monitoring and review processes. Overall, external examiners confirm the quality and standards of curriculum design and assessment methods and relevance. The scrutiny team confirms that staff development activities across the Group enable staff to be made aware of external requirements in relation to academic standards and the quality of learning opportunities, as well as providing additional opportunities for reflection on internal procedural and policy requirements. Team members' observations of programme approval and validation events, monitoring, review and planning meetings, and committee proceedings at various levels, indicated that the policies and procedures are embedded and understood by relevant staff. The scrutiny team confirms that training, support and guidance the Group provides on curriculum development and assessment design in practice is fit for purpose.

166 During the LCC Staff Development Day the scrutiny team observed the DELTAR workshop on Assessment and Feedback Practices in HE that communicated the LCC HE Assessment Policy, requirements of FHEQ and the Quality Code to emphasise the importance of relevant assessment design in higher education. The LCoM Strategic Plan 2015-20 states an aim of embedding collaboration within its culture and a focus on team development to inspire staff to support students and each other. The team confirms that the activities and development discussions throughout the staff development demonstrated this commitment in action.

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)

167 Leeds City College Group (LCCG) actively encourages and supports HE staff to interact with other HE providers through engaging in external roles and these are tracked by HEDO. Fourteen per cent of LCC academic staff and 73 per cent of the full-time LCoM staff are engaged as external examiners, external verifiers or QAA reviewers. These staff represent four LCC departments; five LCC departments have no such staff engagement. Within LCoM, six of the 11 staff included in this number act in two or three of these external capacities. There is one QAA reviewer within each of Teacher Training and HEDO, and in LCoM there are six. The scrutiny team considers the number of LCC staff involved to be low except for one area where two of the team of four are engaged as external examiners. Of the 15 full-time LCoM academic managers, five are external examiners, six are external verifiers and six are QAA reviewers, which the team considers to be appropriate.

168 LCCG encourages academic staff to engage in external events. LCC is a member of, and hosts, the nationwide HE in FE Benchmarking and Learning Gain Project that began in 2015 to develop benchmarks for HE in FE provision for use by member institutions.

D The environment supporting the delivery of foundation degree programmes

Criterion D1

The teaching and learning infrastructure of a further education institution granted foundation 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

169 The effectiveness of learning and teaching activities is monitored through the Group's mechanisms for programme approval and annual review. At an institutional level, this culminates in the Higher Education Annual Review Report, which is considered by HEQEC and Academic Board, and brings together evidence on programme and module reviews, award and pathway meetings, external examiner reports and student feedback across all programmes. At LCoM, a similar process is undertaken but results in a Partner Quality Enhancement Report, in line with the awarding body requirements, and is considered by LCoM's Quality Assurance and Enhancement Group, Academic Council and Academic Board. Student-facing service providers who contribute to the opportunity for students to achieve their learning outcomes, for example the library, also review their activities and are subject to performance review.

170 The relationship between learning, teaching and assessment strategies and the achievement of intended learning outcomes is scrutinised at module and programme level through the validation and programme approval process. Modules are mapped against the level learning outcomes to ensure that there are appropriate opportunities for students to achieve the intended learning outcomes and that the learning outcomes are appropriate for the level of study. Similarly, internal moderation processes review assessment briefs to ensure that learning outcomes are clearly stated and allow students to meet the intended learning outcomes. Through the review of documentation, observations, and discussions with students and staff, the scrutiny team confirms that students are provided with appropriate and clear information regarding the relevant learning outcomes and how these will be assessed.

171 Programme monitoring and review processes include contributions from students, employers, and external examiners in order to monitor the effectiveness of learning and teaching. Performance data is routinely used in award committees to monitor student achievement and the College was commended by its previous awarding body for its use of statistical data to examine internal consistency between modules on programmes. Performance data is also scrutinised during the performance review process. External examiners are asked to comment explicitly upon the achievement of learning outcomes and the overall standards achieved. Observations and documentation reviewed by the scrutiny team show that external examiners confirmed that the assessments undertaken by students were appropriate to enable students to achieve the intended learning outcomes.

172 Academic staff delivering HE programmes are required to take part in an HE-specific peer observation process, which is designed to support professional development in teaching and learning. The peer observation evaluation form explicitly requests the observer to consider how the observed session relates to the intended learning outcomes and how the learning and teaching methods employed by the teacher ensure students are able to meet these. Observers are also expected to comment upon the use of learning

resources, the level of student engagement and whether the content was appropriate for the programme level. The peer observation process is overseen by Programme Managers and HEDO.

173 The scrutiny team confirms that the Group successfully monitors the effectiveness of its learning and teaching activities in relation to stated academic objectives and intended learning outcomes.

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

174 Arrangements for the timely and accurate feedback of the outcomes of assessment are in place and are effective. The assessment of all higher education programmes is currently undertaken in accordance with awarding body requirements. LCC has an Assessment and Moderation Policy while LCoM staff refer directly to the relevant awarding body procedure.

175 Tutors at LCC are required to mark and return assessment within three weeks of submission; at LCoM this is four weeks. Students who met with the scrutiny team confirmed that they had experienced no significant issues with the meeting of this deadline. In instances where this had not been possible (for example, staff illness), students felt that this had been appropriately communicated.

176 The awarding bodies and Pearson provide assessment grading criteria and grading descriptors, which are used in the marking of students' work. This information is detailed within programme handbooks and available on the VLE. Programme assessment timetables are provided within programme handbooks and assessment deadlines for individual assignments are also detailed within module handbooks. Students confirmed to the scrutiny team that the information contained within handbooks, and on the VLE, was clear and reliable and that they understood the operation of grade boundaries and how their awards would be classified.

177 LCCG publishes results to students along with reassessment requirements, where appropriate. At LCC, students are notified of ratified marks by the Board of Examiners in multiple ways. Module results and progression decisions are posted in hard copy on programme notice boards and on the VLE course pages within 10 working days. Students receive a letter detailing their profile and any possible actions required. At LCoM, results and actions required are notified to students via the VLE SPACE in accordance with previously published dates.

178 Compliance with expected turnaround times is monitored at LCC via a process of internal moderation. Internal moderators are expected to monitor and review whether the assessment turnaround time has been met, in line with the expectations set out in the accompanying assessment brief. Student feedback collected through the LCC HE peer-review process also scrutinises the extent to which these expectations have been met. Service standards set by LCoM are also monitored.

Constructive and developmental feedback is given to students on their performance

179 LCCG requires assessment criteria for all modules and the LCC Assessment and Moderation Handbook outlines a clear commitment to providing feedback on all assessed work that promotes learning and facilitates improvement. LCC makes use of standardised assessment and feedback templates to provide feedback to students.

180 Staff development and training on assessment practices refers to the relevant assessment and moderation policy and focuses on feedback mechanisms, practices and policy. At LCC, the Assessment and Moderation Policy and Assessment and Moderation

Handbook clearly outline what is required of staff on the conduct of assessment, marking and the provision of feedback. For LCoM programmes, academic staff follow University of Hull guidelines with regard to assessment practice. New staff receive a bespoke HE induction and a mentor. Training on assessment and feedback practices has been embedded within the DELTAR programme.

181 The quality of feedback to students is monitored through the internal and external moderation process (external examiners) and institutionally via the annual HE peer-review process. External examiners for the academic year 2015-16 consistently comment on the high-quality assessment feedback provided to students, with reports citing feedback as detailed, clear and helpful. Students also spoke positively of the constructive feedback they receive on their assessments. Notwithstanding this, the Group has noted a decrease over time in the overall satisfaction with assessment and feedback in the NSS, and combined with the recommendation arising from the QAA Higher Education Review in this area, the Group has indicated its intention to develop further staff development sessions on assessment and feedback and make this a priority for investigation in the HE peer-review process.

182 The scrutiny team confirms that constructive and developmental feedback is given to students on their assessment; however, the Group intends to strengthen its approach to assessment and feedback in response to declining student satisfaction in the NSS.

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

183 The Group is committed to seeking views from students, staff and other institutional stakeholders such as employers, through a number of mechanisms. The Group has student, staff and employer representatives on its Board of Governors, all of whom are full members of the Board and may be allocated discrete responsibilities as Lead Governors (see paragraph 2). The Students' Union President is invited to observe the LCoM Board.

184 LCCG has clear processes in place for obtaining and responding to key stakeholders, students, staff, and employers throughout the lifecycle of programmes. At the programme development and approval stage, programme teams consult with external stakeholders, such as employers; although the employers who met with the scrutiny team had not had involvement in these processes. The annual monitoring and review processes also involve contributions from students, employers, and external examiners. Programme teams are required to respond to employer feedback on work-based learning and placement learning in their annual reviews.

185 The College values the contribution of the student voice in the development of learning opportunities and the student experience, collecting feedback through multiple mechanisms including module reviews, annual course review, the NSS, internal surveys and course committees. Students and staff were able to provide examples of where feedback from these stakeholders had been considered and responded to appropriately and effectively.

186 The course representative system is considered by staff and students as an important mechanism in soliciting and responding to the student voice. Training for student representatives for LCC and LCoM is separate, but is considered by students to be equally effective and useful. Student representatives receive a handbook to further support them in their role.

187 There is provision for student representation on a wide range of deliberative higher education committees. At a strategic level, this includes the Board of Governors, the joint Academic Board, the HEQEC and the Academic Council at LCoM. While students who met

the scrutiny team felt that they had sufficient representation on these deliberative committees, in their observation of such committee meetings, the scrutiny team noted that student representatives were not always present. In recognition of the inconsistency of student attendance at meetings such as the Award Committee and Academic Board, LCC had sought to address this through revising the student representatives attending these meetings; however, it is not clear that this has had the desired effect.

188 Student representatives are also invited to LCC Student Pathway meetings and LCoM Student-Staff Forum meetings, providing student representatives across the provision with a platform to discuss matters in detail with members of HEDO or LCoM senior staff. In the case of LCoM, the results of these discussions are considered by Academic Council, and reported to HEQEC, at LCC.

189 The HE peer-review process also includes formal opportunities for students to provide feedback, with clear demonstrations of how actions are taken forward by the College. Students also spoke positively about the informal mechanisms available to them. The LCCG was able to demonstrate clear examples of how student feedback had been responded to and acted upon to enhance the student academic experience.

190 The Group operates a number of mechanisms to communicate with staff and obtain their feedback, including the formal governance and quality management systems, performance review, and staff surveys.

191 Academic and professional support staff informed the scrutiny team that effective and open communication channels existed among staff and between staff and senior management. Staff felt that they had sufficient opportunity to contribute to policy developments and were consulted on proposed substantive changes. For instance, staff spoke positively of the opportunities to contribute to the development of new Group strategy and their involvement in policy developments, such as the revised peer observation process. Staff were also confident they were appropriately informed of any developments within the Group that might affect them or their teaching, and that this information was accessible via the staff portal.

192 In addition to employer feedback in the design and development of programmes, the LCCG seeks feedback from employers via surveys and fora. Staff confirmed that they felt they have a close working relationship with employers, and the few employers who met with the scrutiny team confirmed that they felt listened to and that the College fostered positive working relationships.

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

193 The LCCG operates a comprehensive programme of induction that successfully introduces students to their programme, learning environment and available support services. Both LCC and LCoM operate institution-wide inductions, supplemented by a programme or pathway specific induction. Programme teams make use of a standard induction checklist to ensure students receive consistent information on teaching, learning and assessment policies and procedures; the awarding body and its relationship to the College or Conservatoire; and the support services available to students. LCC programme teams require students to sign a student-facing version of this induction checklist to confirm both their understanding of the information provided during induction and that they have access to all the key information.

194 During induction, students receive a programme handbook, relevant module handbooks, which have been adapted from a standard template provided by HEDO, and a Student Charter. At LCoM, this documentation is supplemented by student handbooks. A

separate induction to the Library is provided online, either via the LCC website or the LCoM VLE. The scrutiny team learnt that additional induction sessions are often introduced in response to student feedback or changes in practice, policy or procedures. For instance, LCoM offers health and wellbeing sessions to encourage students to protect their ears when in rehearsals and specific guidance for international students. LCC introduced specific training for students on the operation of new academic regulations.

195 The effectiveness of enrolment and induction processes is monitored by the joint HEQEC, and for LCC is also considered by award committees and forms part of the annual review and annual planning processes. Enrolment and induction processes are formally evaluated by LCCG students via an annual Enrolment and Induction Student Survey, the results of which are also considered by the joint HEQEC. Student engagement with this survey at LCC is monitored as part of performance review.

196 LCCG maintains a Published Information Responsibilities document, which outlines the post-holder responsible for the accuracy of the information contained within programme and module handbooks, and the accuracy and currency of pre-programme information received by applicants. Compliance with the process for induction, as outlined above, is routinely monitored by HEDO and at award committees. At LCoM, Registry and Curriculum Leaders design and oversee the induction programme.

197 Students are encouraged to declare any additional needs (such as disability), through the application process and are subsequently supported by the appropriate support service(s) during their studies. Programme teams also make use of early formative and summative assessments as an opportunity to identify any additional learning needs that may not have been declared at the application stage. The scrutiny team heard examples of students with additional learning needs being offered alternative induction processes to support their transition into the LCCG, for instance, by hosting induction events on a one-to-one basis or in smaller groups, or at alternative times or venues, or permitting students to take summer school modules. Students confirmed that this was particularly welcomed.

198 Students spoke positively about their experiences of induction and the accuracy of information provided during the application stage and induction processes, with particular reference to the detailed programme and module handbooks provided. Students were confident that the programme handbook served as a definitive and useful source of information for all academic and non-academic related matters, and confirmed that this, alongside other materials provided during induction, were available on the VLE.

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

199 As part of the programme approval process, and in consultation with their link librarian, programme teams are required to consider any additional learning resources needed to support the delivery of the proposed programme. The provision of learning resources is further scrutinised at the validation panel where a statement from the Library confirming that appropriate resources are in place is required as part of this process. Library and student support staff work with programme teams to ensure that the appropriate learning resources are in place prior to the commencement of the programme and discussions with academic and professional support staff confirm that this relationship is effective. The programme annual review process requires programme teams to review the provision of learning resources to verify that these remain fit for purpose, and drawing upon student, employer and stakeholder feedback. Heads of Department also have the opportunity to discuss any additional resource needs as part of performance review.

200 The results of the National Student Survey (NSS) (including student satisfaction with learning resources) are considered as part of the annual monitoring process and are

subject to scrutiny at deliberative committees. Learning resources is a standing item on the agenda of the HEQEC, which enables the continued consideration of the provision of learning resources throughout the academic year. Library representatives are full members of this committee and the LCoM Academic Council. An annual self-assessment report is compiled to review the opportunities for enhancement of provision across the College with respect to learning resources and learning and student support, with due consideration given to the needs of different student groups. For instance, the scrutiny team heard examples of materials being presented in alternative formats, and student presentations being recorded in advance, rather than having to present directly to their peers.

201 In addition to completing the NSS, and their involvement in the annual review process, students are also invited to comment upon the provision of learning resources as part of the HE peer-review process. Staff also considered the student representative system as a key mechanism for assessing student satisfaction with learning resources. Students who met the scrutiny team confirmed that they felt the Group was responsive and proactive in requests for additional learning resources.

202 The scrutiny team learnt that LCC operated across three different learning platforms (Moodle, Google Classroom and Google Cloud), with the intention of moving to a single platform in the future. Students who met the scrutiny team were confident they knew which platform to use in the period of transition and that required information had been successfully migrated. Staff were similarly confident that they were using the appropriate platform, and effectively. Minimum requirements are set for the VLE and audited by HEDO and in the annual peer-review process. LCoM makes use of a single VLE platform: SPACE.

203 LCCG makes effective use of technology to support students in their learning. For instance, LCC has invested in swivel cameras to support lecture capture and LCoM makes effective use of technology to record teaching sessions, where possible. The College states that all higher education students and staff at LCC are provided with a Chromebook to facilitate interactive learning in the classroom and to integrate with the single desired VLE platform for higher education learning and teaching activities. The scrutiny team saw evidence of these being used effectively by staff during observed DELTAR events. However, during the course of the scrutiny, a small number of students who met with the scrutiny team had not been provided with a Chromebook. Students who had been provided with the laptops spoke positively of their experiences and the use of Chromebooks was commended by the awarding body at validation.

204 Investment has been made in the repurposing of an existing LCCG building to create a University Centre for its LCC HE students, including a dedicated Study Zone. While the scrutiny team met with students and staff during the infancy of this new building, all stakeholders felt that the HE Centre had created a welcomed distinct culture for higher education students and staff. Library representatives host weekly student drop-in sessions based at the HE University Centre to facilitate student access. Academic learning support is also available to students via Student Support Services and HE students have access to an inter-library loan scheme.

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

205 Confidential counselling services are available to LCCG students. Students are encouraged to contact their personal tutor in the first instance for advice and support, and students who met the scrutiny team felt confident and comfortable doing so. At LCoM, female students are able to request a female personal tutor.

206 The LCC has two Counselling and Mental Health Officers to support the mental and emotional wellbeing of students, who are based within a broader Student Services Team.

Students are afforded the opportunity to contact these advisers independently through a self-referral form made available on the VLE, but also through referral in discussions with their personal tutor. The VLE also contains information on external support services and emergency services.

207 LCoM has a dedicated Wellbeing Room, often referred to by students as 'Room 40B'. Here, students are able to seek counselling support, alongside a range of other support services.

208 LCCG students are informed of the welfare services available to them through their course or student handbooks and as part of the induction process. Students who met the scrutiny team confirmed that they were satisfied with the services available to them.

209 The effectiveness of student support services is reviewed via an annual self-assessment report, but in the future will be subject to the same periodic review and monitoring as academic departments, via the performance review process.

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

210 The central information system is used to generate reports on applications, attendance, retention and achievement. Such reports are generated monthly and reviewed at meetings of the HEQEC and Academic Board. This data is also considered as part of programme annual review, and the performance review process. The Board of Governors has oversight of this data via the LCC Higher Education Annual Review report. Observation of the management information system in use confirms its effectiveness.

211 The Group makes use of module and examination boards to monitor the performance of students, and the use of pre-boards to ensure that information presented to the examination board is accurate and reliable. HEDO staff at LCC and Registry staff at LCoM are responsible for the collation of data spreadsheets by programme for consideration at the examination board. External examiners confirmed that they received the relevant documentation prior to examination boards. LCC hold mid-year boards to consider student progress; this is felt to be a supportive mechanism for the College and a way of checking module and programme achievement at an early stage. Staff receive training on the operation of progression and award boards.

212 The scrutiny team confirms that the Group's administrative support systems to monitor student progression and achievement are in place and effective. These systems ensure the timely and accurate release of data for the operation of module and examination boards and for consideration of such data at deliberative committees.

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

213 The Group has in place policies and procedures of the consideration of complaints and appeals. All policies and procedures are in line with the requirements of the Office of the Independent Adjudicator (OIA) and the Quality Code. At present, LCC and LCoM operate different procedures for the consideration of complaints and appeals; however, the Group is exploring the development of a single policy for all their higher education provision, through its harmonisation process (see paragraph 58). LCC and LCoM are both members of the OIA but independently so. Some students who met with the scrutiny team were not aware of the OIA.

214 LCC operates a separate complaints policy for its higher education students; however, its higher education complaints process is available for all stakeholders (including employers), and is subsequently made available on the LCC website. The LCoM complaints policy applies to all its students (including further education students). Both student complaints policies make clear the available grounds for complaint (to distinguish these from academic appeals) and the timescales for the management of these complaints; the support and guidance that is available to students; and a template form for submitting a complaint. LCC follows the academic appeals policy of its awarding body, while LCoM has its own academic appeals policy. At LCoM there is also a separate admission appeals policy. All these documents are available to students through the VLE and in programme handbooks and the process for submitting a complaint or appeal is discussed with students as part of the induction process.

215 Students and staff at all levels spoke with confidence regarding the complaints and appeals processes for students. Students also felt confident that they could approach tutors or make effective use of the student representative systems to voice any concerns where it might not be appropriate to raise a formal complaint.

216 An annual summary of complaints and appeals, and any associated actions, receives deliberative scrutiny through the LCC Higher Education Annual Review and the LCoM PQER. The Higher Education Annual Review report is considered by the HEQEC and Academic Board; the PQER is considered by the LCoM Quality Assurance and Enhancement Group, Academic Council and Joint HE Academic Board.

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

217 The Group has a commitment to CPD with appropriate mechanisms for the identification of professional development opportunities. The staff appraisal process is predominately used to identify and agree professional development requirements. The annual self-assessment review of service provision also provides an opportunity to review professional development needs across teams. The DELTAR programme is also extended to professional support services staff and HE Sharing Good Practice Days.

218 Professional support staff are able to access financial support for personal and professional development, including attendance at conferences, external training programmes or academic study (usually at master's or doctoral level). There are also opportunities for professional support services staff to seek professional qualifications or membership (such as Chartered Institute for Library and Information Professionals), and be a guest lecturer at the College. Staff are encouraged to maintain a record of the CPD and the template is designed to encourage staff to reflect upon how the CPD activities have had an impact on the professional practice. At a Group level, LCCG maintains staff qualification trackers (for academic and professional support staff) which records previous and ongoing professional development activity.

219 All professional support services staff must undertake compulsory training on Safeguarding, Equality and Diversity and Health and Safety, compliance with which is monitored at performance review.

220 Staff who met with the scrutiny team confirmed that they were clear on how and where to apply for funding for professional development activities and spoke positively of the range of opportunities available to them.

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

221 The 2016 QAA Higher Education Review of LCCG recommended that: the Group increase the transparency and thoroughness of the mechanisms within LCoM for formal approval and oversight of published information; that the Group ensures that there is oversight at the highest level of the College; and that the information produced for staff, students and external stakeholders is fit for purpose, accessible and trustworthy. In response to these recommendations, the Group developed a harmonised approach to ensuring the accuracy of published information. LCCG now maintains a Published Information Policy and Published Information Responsibilities document, which outlines the post-holders responsible for the accuracy of the information contained within programme and module handbooks, the accuracy and currency of pre-programme information received by applicants and the maintenance of higher education learning and teaching policies. This document also clearly articulates where approval is required within the deliberate committee structure and published information is now also a standing agenda item on the joint HEQEC. This work was overseen by a dedicated Project Group, sponsored by the LCoM Academic Council. The Group has also informed the scrutiny team of its intention to review its approach to published information to ensure compliance with the Consumer Markets Authority and new Data Protection legislation; however, this work is scheduled to take place after the completion of the scrutiny period.

222 During the course of the scrutiny, some issues with respect to the provision of accurate information were apparent. During a validation event, the validation panel identified inconsistencies in the information contained in programme specifications to the information provided on the website. This appeared limited to one subject area and students, on the whole, felt that the website provided appropriate and reliable information when making an informed choice on their place and programme of study. At an earlier stage of the scrutiny, the team was provided with policy documents that had been approved by their respective committee but were still watermarked draft. However, this was rectified during the course of the scrutiny and no further errors of this kind were found. Employers, mentors and tutors are issued with a handbook confirming their respective roles with regards to work-related learning. It appeared to the team that there was a lack of clarity in the information provided to mentors regarding their role which may lead to inconsistency in the student experience (see also paragraphs 78 and 80).

223 HEDO plays a key role in developing and approving all public information and information provided to students. Reports produced by HEDO, such as the HE annual review also play a key role in auditing the information generated by programme teams in order to ensure its accuracy and compliance with the use of standard templates for module and programme handbooks, which in turn ensures students are provided with consistent and reliable information. Students who met the scrutiny team praised the information related to learning, teaching and assessment contained with module, programme and student handbooks. Students are also provided with handbooks for work-related experience.

224 Responsibility for information about programmes on the VLE lies with the Head of Undergraduate Studies and Head of Postgraduate Studies at LCoM, and Programme Managers at LCC. Minimum requirements are set for the VLE and are audited by HEDO and via the annual peer-review process. Review of the documentation available on the VLE indicates some variability of the amount of information provided but confirms that departments meet these minimum expectations. The information provided centrally by HEDO on the VLE, and LCoM via SPACE, is comprehensive and provides students with access to all relevant higher education policies, procedures and guidance.

225 Staff confirmed that Staff portals, located within respective VLEs, are appropriate repositories for information, policies, procedures and guidance concerning its HE provision. Furthermore, staff felt that the information provided during new staff inductions was helpful and supportive.

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

226 The Group demonstrates a strong commitment to equality and diversity. This commitment is led by the LCCG leadership team and Governors and demonstrated by assigning a Governor with specific responsibility for championing equality, diversity and inclusion matters. LCCG has structures, policies and procedures in place for monitoring and developing its equality and diversity agenda.

227 LCC has an Equality and Diversity Policy while LCoM maintains an Equality, Diversity and Inclusion Policy Statement. LCC and LCoM also have separate supporting policies to assist LCCG's collective approach and commitment to equality and diversity and inclusion; for instance, a Policy against Bullying, Harassment and Victimisation (incorporating Dignity at Work), Diversity in the Workplace, Transgender Policy, and Safeguarding and Prevent Policy. All policies are available on their respective VLE and LCC specific policies are also available on the Knowledge Bank area of the College website.

228 LCC has a detailed Equality and Diversity Action Plan, which is monitored by the Equality and Diversity Committee. The LCoM Equality, Diversity and Inclusion Action Plan and associated objectives are monitored by the Equality, Diversity and Inclusion Group. As part of the LCCG's commitment to equality, diversity and inclusion, there is cross-membership of LCC and LCoM colleagues on these committees. Reports are presented to the Board of Governors and Board of Directors respectively.

229 The LCC HE Strategy outlines a commitment to designing, developing and delivering a relevant curriculum that is reflective of the diversity of the student group. Equal opportunity is also sought through the setting of assessments to ensure that all students are able to demonstrate their achievement of the required learning outcomes. The College routinely reviews the performance of students with protected characteristics in the annual review process at both programme and College level. Academic appeals are monitored in relation to race, gender and disability.

230 Each department is required to develop an Equality Improvement Plan, which details a minimum of three actions specifically related to equality and diversity matters, alongside departmental level equality-related performance data and measures. Progress against these actions is monitored and scrutinised by senior management, via the performance review process.

231 An Equality Analysis Screening Tool is used to enable staff to assess new and existing policy developments against the requirements of the Equality Act 2010 and meeting agendas at LCCG now include a standing item on Equality, Diversity and Inclusion; a practice which has been adopted from LCoM. LCoM's staff appraisal process requires the consideration of how equality and diversity is embedded within individuals' roles.

232 Equal opportunities are observed in recruiting staff, and workforce equality and diversity data is routinely considered by the LCC Equality and Diversity Committee and the LCoM Equality, Diversity and Inclusion Group, respectively. Reports on the diversity of the student and staff bodies at LCC and LCoM are also made available on their respective websites. Equality and diversity training is mandatory for all academic and professional support staff, as well as Governors and is updated every three years. All new staff at LCCG are required to undertake this training as part of their induction, and compliance with this compulsory training is monitored via performance review. LCCG has identified members of

staff as 'Equality Champions' to share good practice across and within LCC and LCoM respectively. Equality Champions are also required to produce an annual report on their work. This practice is more embedded at LCoM, having only recently been introduced at the College.

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