



# Quality Review Visit of Bromley College of Further and Higher Education

March 2017

## Key findings

### **QAA's rounded judgements about Bromley College of Further and Higher Education**

The QAA review team formed the following rounded judgements about the higher education provision at Bromley College of Further and Higher Education.

- **There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.**
- **There can be confidence that the quality of the student academic experience meets baseline regulatory requirements.**

### **Areas for development**

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

- further embed student involvement in quality assurance processes, in particular the evaluation of learning and teaching (Quality Code)
- provide further clarity on the procedures for appealing admission decisions (Consumer Protection).

### **Specified improvements**

The review team did not identify any **specified improvements**.

## About this review

The review visit took place from 7 to 8 March 2017 and was conducted by a team of three reviewers, as follows:

- Miss Elizabeth Shackels
- Mrs Alexandra Day
- Mr Harry Williams (Student Reviewer).

The overall aim of Quality Review Visit is to:

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

Quality Review Visit is designed to:

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

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

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

## About Bromley College of Further and Higher Education

On 1 August 2016 Bromley College of Further and Higher Education (the College) merged with Greenwich Community College and Bexley College to form London South East Colleges (LSEC); however, the legal name of the Corporation remained the same. The College was granted University Centre status in 2015 and as a result of the merger delivers higher education provision across four of its five main campuses, with the majority of higher education students located at the Bromley campus. At the time of the review visit the College had 700 higher education students, of whom 406 were full-time and 294 were part-time.

The College's higher education provision is delivered on behalf of two awarding bodies, Canterbury Christ Church University and the University of Greenwich, and one awarding organisation, Pearson Education. There are 46 higher education programmes delivered across the faculties of Business, Built Environment, Education and STEM. Provision includes full honours undergraduate degrees; foundation degrees; a Professional Certificate and Professional Graduate Certificate in Education; and Higher National Certificates and Diplomas.

## Judgement area: Reliability and comparability of academic standards

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

1 The College does not have degree awarding powers but has partnership agreements with Canterbury Christ Church University and the University of Greenwich and an agreement with the awarding organisation, Pearson. The awarding bodies and awarding organisation are responsible for defining their own academic standards and have the authority to design, approve and assess programmes that lead to their awards. They ensure that UK threshold academic standards are met by aligning programme learning outcomes with the relevant qualification descriptors. Processes for ensuring that qualifications meet the FHEQ are detailed in the Awarding Partners Quality Assurance Manuals.

2 The Dean of Higher Education has managerial oversight of higher education provision within the College. The College has established a number of internal committees that monitor and report on the delivery of its higher education programmes, such as the Higher Education Committee. The College is accountable for the delivery and assessment of all programmes and meets its responsibilities for academic standards by producing an Annual Institutional Report for each of its awarding bodies.

3 Programme teams take account of external reference points in the design of their programmes and refer to these in programme handbooks. They are also responsible for ensuring that students demonstrate that they have met the descriptors through the assessment criteria for the level of their programme. Cross-moderation events with the awarding bodies provide assurance that comparable standards are met by the College. External examiners appointed by the awarding bodies and awarding organisation also confirm in their reports that standards are comparable with those of other UK higher education providers.

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

4 The College's Executive Group (CEG) and Higher Education Academic Planning and Student Experience Committee are responsible for maintaining oversight of academic standards at an operational level through receiving and scrutinising minutes from other committees, such as the Higher Education Committee, Curriculum Team Meetings, Programme Review Meetings, and Academic Performance Reviews (APRs). CEG reports to the Curriculum and Quality Committee, a subgroup of the Board of Governors, providing an additional element of scrutiny. In addition, the Dean of Higher Education and Vice Principal (Innovation and Enterprise) meet with the Board of Governors' higher education representative to discuss items relating to higher education.

5 The Corporation maintains a comprehensive risk register covering all potential financial and academic risks to the College and uses this as the primary mechanism for maintaining oversight of academic risk. Through the Audit Committee, the College manages academic risk by updating the risk register at each meeting of the Corporation. The Corporation also invites senior management to answer challenges relating to academic risk wherever necessary. In addition, the CEG receives and scrutinises APRs, which include various key performance indicators such as success and attrition rates.

6 The College encourages members of staff to undertake scholarly activity and engage students with external speakers. The College's Visiting Speakers and Fundraising Guidance and Research and Ethics Framework demonstrate a commitment to academic freedom, collegiality and freedom of speech, while noting that there is a duty of care to ensure that students and staff are not unnecessarily exposed to extremism or extreme material.

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

7 The College operates according to the academic frameworks and regulations of its awarding bodies and awarding organisation. The frameworks and procedures ensure that the academic standards of awards and qualifications are set out in agreements with the College.

8 Approval and re-approval of the programmes delivered by the College follow the frameworks, regulations and procedures of the awarding bodies and awarding organisation.

9 Definitive documents for university awards are maintained by each university, and by the College for Pearson awards, and constitute the reference point for delivery and assessment of the programme.

10 Where changes to programmes are requested or new programmes proposed, the College has an internal sign-off process, which is completed in advance of the awarding body or organisation procedure and ensures managerial oversight of any proposed changes. In the previous academic year, a periodic review process has been introduced for all Pearson programmes.

11 The College carries out assessment in accordance with assessment policies, regulations and processes of the awarding bodies and awarding organisation and is informed by UK threshold standards and the academic standards of the relevant awarding body or organisation. College staff work effectively with University Academic Link Tutors to ensure that the assessment and feedback strategies for awarding bodies are implemented in accordance with the respective academic frameworks and regulations.

12 Canterbury Christ Church University has responsibility for setting assessments for its programmes while the College sets assessments for all other programmes. University of Greenwich assessments are approved by the Academic Link Tutor and Pearson assessments are subject to an internal verification process within the College. On completion of marking and feedback processes, samples of work are sent to the Academic Link Tutors for moderation in accordance with the regulations of each awarding body.

13 Staff provide developmental feedback on marked work and students commented positively about the information provided on assessment and the feedback offered to inform future learning.

14 The College has provision for accreditation of prior learning of Pearson programmes through College policy and through the respective policies and academic regulations of the awarding bodies.

15 External examiner reports confirm that the management of academic standards is effective; that assessment processes are appropriate, contain clear feedback to students, and are internally moderated in accordance with school assessment policies; and that the standards of student performance are comparable with similar programmes or subjects in other UK institutions with which they are familiar.

16 The College makes good use of external examiner reports (EERs), actions from which are incorporated into the Programme Monitoring Reports (PMRs) and then into Annual Institutional Reports (AIRs) for the awarding bodies. An analysis of EERs is provided to the senior management team, with any common themes emerging incorporated into staff development days. Students confirmed that EERs are available for them to access on the virtual learning environment (VLE) and are discussed at Programme Review Meetings.

17 Appropriate arrangements are in place for work placements, which are organised between tutor, student and employer, who follow the guidance, support and risk assessment procedures in the workplace learning manual.

18 The College has a robust structure of higher education committees, which quality assure, scrutinise and monitor the delivery of higher education within the College. PMRs have a clear focus on academic standards, inclusion of external examiner and student feedback, and utilisation of key data and smart actions. PMRs feed into awarding body annual monitoring reports, actions from which are monitored in Quality Performance Reviews (QPR) received by the Academic Planning Committee. The QPR process identifies underperformance, challenges it, identifies actions and monitors outcomes. In addition, AIRs are submitted to awarding bodies for their scrutiny, an Annual Report is compiled by Pearson and a Higher Education Quality Assurance Statement is provided to the Corporation.

19 A comprehensive range of qualitative and quantitative data is systematically used to monitor academic standards. This is evident through PMRs, AIRs, the Higher Education Data Collection Sheet for the QPRs and numerous actions plans such as those for Higher Education and TEF Metrics, where data is drawn from a variety of sources to track progress, monitor key performance indicators, generate actions and feed into higher education committees and quality assurance processes.

## **Rounded judgement**

20 The College has demonstrated its effectiveness in meeting the baseline regulatory requirements for academic standards through its governance structures; internal processes and procedures; adherence to the regulations of its awarding bodies; and the awarding organisation and engagement with the FHEQ. There are no areas for development or specified areas for improvement in this judgement area.

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

## Judgement area: Quality of the student academic experience

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

22 Managerial oversight of higher education within the College rests with the Dean for Higher Education, who is supported by the Associate Dean for Higher Education Curriculum Development and by the Associate Dean for Higher Education Quality and Student Experience. The Associate Dean for Higher Education Quality and Student Experience has specific responsibility for monitoring the quality of the student learning experience.

23 The College has established a number of committees that have oversight of higher education. These include the Higher Education Academic Planning and Student Experience Committee and the Higher Education Committee. The Higher Education Committee reports directly to the Higher Education Academic Planning and Student Experience Group, the College Executive Group and the Governing Body. Terms of reference have been devised for each of these committees that clearly define their purpose and membership. Elected student representatives from each department are members of the Higher Education Committee.

24 To ensure that the College meets its responsibilities under its agreements, the College has devised and embedded a Higher Education Quality Cycle that is supported by a number of internally developed policies and procedures. These have been introduced to create rigour in the College's management of its higher education by being mapped to the Quality Code and aligned to awarding body regulations as outlined in the partnership agreements. The Director of Quality and Standards has responsibility for ensuring that the College is compliant and meets its responsibilities to its awarding partners.

25 The College has appointed a Student Governor and a Governor who has specific responsibility for higher education. They meet with the Dean of Higher Education and the student body each term.

26 The student voice is heard through two main forums, the Student Council and the Student Union. On each campus a Vice President of the Student Union has been appointed. Elected higher education student representatives sit on the Higher Education Student Council and are also co-opted onto other higher education College forums. Students both full-time and part-time are elected and represented at course level and meet regularly with staff to discuss course-related issues. Furthermore, the 'You Said, We Did' feedback system provides an opportunity for all students to respond to the College on the quality of provision. The review team found the student voice to be articulate, positive and well engaged.

27 The College uses a range of data metrics to monitor the performance of its higher education provision and includes QDP surveys, end-of-module questionnaires, 'You Said, We Did' and National Student Survey data. The College rigorously analyses this data to inform strategic and curriculum planning, progress in meeting higher education objectives, and monitoring key performance indicators such as retention, achievement and progression. The College also maintains both a risk register and a key performance indicator Corporation sheet that monitors student satisfaction. The Governing Body is well informed of this through the Curriculum and Quality Subcommittee of the Governing Body.

28 The review team noted that the satisfaction metrics for part-time students are significantly below the benchmark level and on a downward trend. The team reviewed the evidence base presented and discussed this issue with the College. The College acknowledged that the issue arose pre-merger and have demonstrated a positive approach

in addressing the matters raised. The review team considers that the College has taken appropriate steps to address the issue.

29 While the review team found that supportive and effective relationships had been developed between tutors and students through both the student representative system and the 'open door' ethos adopted by the College, it was unclear whether students are fully aware of how the College's quality assurance processes around the evaluation of learning and teaching are promoting the quality of the learning experience. Therefore the review team identifies an **area for development** and advises the College to further embed student involvement in quality assurance processes, in particular the evaluation of learning and teaching.

30 Performance is effectively managed at all levels and particularly at faculty level through the Performance Review process. Underperformance is supportively challenged and managed with actions drafted, agreed and monitored by the Director of Quality and Standards. Where appropriate, staff development training is provided to promote improvement. Oversight of this process rests with the Director of Quality and Standards.

31 The College has devised a Learning, Teaching and Assessment Strategy that has been aligned to core themes of the awarding bodies. A specific College higher education observation pro forma has been designed and is well embedded at course level. In addition, a peer-review process has also been implemented by Canterbury Christ Church University. College staff not only become associate tutors of the University but are also invited to participate in staff development activities at the University, such as curriculum conferences. Dissemination of good practice occurs through team meetings and staff development days that are scheduled annually.

32 Students are involved in feeding back on assessment of learning and teaching through the module evaluation process and at student representative meetings. The College employs a range of processes to collect feedback and respond to students that includes both internal and external survey processes. The College's analysis of data to promote improvement is effective.

33 The College has recently invested in the physical infrastructure of its learning resources and has built a dedicated higher education hub area for students, an action which has been designed to further enhance the quality of provision. The College is working on creating greater flexibility within its curriculum development through the use of blended learning and virtual delivery. The College VLE is adequately utilised by students and is used primarily as a repository for course information such as teaching and learning resources and external examiner reports.

34 Staff who currently teach on higher education programmes are either qualified or working towards their professional qualification in teaching. The College has established a higher education CPD Research and Scholarly Activity Forum which reports to the Higher Education Committee. The role of the Forum is to evaluate applications for research and upskilling and then to advise the Higher Education Committee on the approval of these applications. Once approved, both the Faculty and Human Resource department are notified accordingly.

35 The College is currently engaged with the Higher Education Academy and a number of staff are currently working on submissions for fellowship and senior fellowship awards. Staff development days are organised, planned and scheduled on an annual basis through the Human Resource department of the College.

36 The College has established an Employer Advisory Board that consists of a range of stakeholders including local employers and students. This panel is chaired by the Vice



Principal (Innovation and Enterprise). The College provides students with a range of opportunities to develop their employability skills, such as 40 days' work experience, skills workshops, guest speakers and the development of PAGES, a framework that will allow students to evidence how they have developed the skills, qualities and attributes required by future employers.

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

37 The College aims to involve students in academic governance and quality assurance processes. Students are represented at course level via elected student representatives who attend meetings of the Student Council. The Student Council, run by the Dean for Higher Education, provides student representatives with an opportunity to highlight issues relating to programmes to senior members of staff. In addition, students elect full-time sabbatical officers to the College Student Union and one sabbatical officer sits as the student representative on the College Board of Governors. The Student Union submits a report to the Board of Governors on an annual basis, expanding on current student issues.

38 Student representatives are invited to attend College committees including Programme Review Meetings and Higher Education Committee. Students are also members of the Employer Advisory Board and Research and Scholarship Committee and thus contribute in setting the strategic direction of the College. Student representatives are also co-opted to attend meetings of the recently established Higher Education Academic Planning and Student Experience Committee. It is the responsibility of the Deputy Principal to review the effectiveness of these committees and, on an annual basis, determine whether alterations are necessary.

39 The College's senior management team and Board of Governors receive annual summary reports of higher education student complaints, appeals, and any Office of the Independent Adjudicator (OIA) submissions. These reports are considered, trends identified, actions agreed, and the effectiveness of previous actions evaluated. For example, the College had identified the downward trend in part-time students' satisfaction and attempted to resolve the issue through introducing one-to-one personal tutorials.

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

40 There is a clear auditing process within the College for ensuring that all information is accessible and trustworthy. Responsibility and oversight of this process rests with the Higher Education Registrar. This process is cross-college and involves both academic and support staff. The College flowchart illustrates what staff are responsible for at each level and what actions must be undertaken. It also highlights who has final sign-off for all published information.

41 Responsibility for student recruitment and the admissions process lies with the College. The Higher Education Registrar works closely with the awarding body counterparts to ensure that all information and admission processes align to that of awarding bodies. The College's Admissions Policy and Procedure clearly articulates the application process for different types of higher education programmes and is accessible on the College's website.

42 There is a clear internal process for admissions. The Higher Education Registrar and higher education curriculum staff, aided by the Student Hub team, are responsible for



ensuring that an efficient admissions process is in place. All admissions decisions are the responsibility of the relevant programme leader at the College (except for four programmes where the awarding body makes the decision). The College has sufficient mechanisms in place to ensure that the approach to admissions is consistent and transparent.

43 The College has a Public Information Sign-off Procedure, which defines the College's expectations with respect to publishing information related to its higher education provision. Staff in meetings were clear about how the process operates in practice.

44 Potential applicants can access information about programmes through a variety of media. The website contains a generic section about the College and its values along with the Admissions Policy and Procedure, the Higher Education Complaints Procedure, and the College's Higher Education Conditions of Registration. Information provided about degree programmes and study at the College is consistent with Competition and Markets Authority guidelines. Written information is supplemented by links to online enquiries.

45 All staff receive an annual update on admissions and are briefed on consumer protection compliance requirements and provision of 'material information' at all stages of contact with potential students.

46 The College Conditions of Registration are comprehensive, fair and easily located and signpost students to awarding body Conditions of Registration. Offer letters direct prospective students to the relevant awarding body Conditions of Registration and to the College's Conditions of Registration for Pearson programmes, thus ensuring timely sight of relevant terms and conditions.

47 The Complaints Policy is accessible and fair and in the majority of cases clear. The College generally has appropriate processes in place to ensure this. However, admission rejection letters direct students to the Admissions Policy if they wish to appeal the decision and this, in turn, directs students to the Complaints Policy, which redirects the student back to the Admissions Policy. Consequently it is unclear how potential students can appeal an admission decision. Therefore, the review team identifies an **area for development** and advises the College to provide further clarity on the procedures for appealing admission decisions.

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

48 Course alterations, both minor and major, can be initiated by either the College or the relevant awarding body using prescribed processes. The College uses a number of tools to assess the impact of course alterations and closures, including consulting the relevant validation documentation and utilising the College's Higher Education Marketing Working Group to enhance understanding of the current local higher education market. The College's terms and conditions, provided to both applicants and enrolled students, informs students of the possibility of course alterations prior to their joining the College. Students are subsequently consulted on course changes and modifications through ongoing surveys, student representatives, and through dialogue with members of College staff.

49 Confirmed course alterations are communicated to the relevant staff and students through the College's website, course documentation and student representatives. The College has mature relationships with its awarding bodies and developed processes to handle in-house course closures. In most cases, the College will attempt to teach-out

courses; however, the College endeavours to work with its awarding bodies to find suitable alternatives for students on courses that close, including allowing students to transfer credits to an ongoing programme. In the event of the closure of another provider, the relevant awarding body will communicate with the College to confirm whether it has offered affected students the College as an alternative institution and thereby ensure continuity of provision.

50 The College's complaints procedure articulates the process for submitting a complaint or non-academic appeal. It was, however, unclear how unsuccessful applicants to the College can appeal admissions decisions. This issue has been dealt with as an **area for development** in the previous section.

51 Students on higher education programmes at the College may access the complaints process up to three months following their graduation. Split across informal, formal, and appeal stages, the College encourages students to resolve complaints informally before they consider the submission of a formal complaint. Complaints are dealt with in an independent and confidential manner with support from the College and Student Union available. If unsatisfied with the outcome of their complaint to the College, students may approach the relevant awarding body to seek a University-level review of the decision.

52 Students are made aware of the OIA and directed to both the OIA and Competition and Markets Authority websites for additional information relating to appealing unsuccessful complaints to the College. Complaints are monitored by the CEG on a half-termly basis with an annual monitoring report produced for the Board of Governors, where the actions taken and recommendations arising from complaints are discussed. Academic appeals are not covered by the College's complaints and appeals policy but submitted directly to the relevant awarding body using the appropriate process.

## **Rounded judgement**

53 The College has demonstrated through its governance structures and internal policies and procedures that it meets all the baseline regulatory requirements in this area effectively. There are two areas for development in this judgement area where either activity is underway or there are minor omissions or inconsistencies. There are no specified improvements in this area.

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

## **QAA1922 - R9456 - Aug 2017**

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