Application for Foundation Degree Awarding Powers: Cornwall College Group

Scrutiny team report

February 2018

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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 Cornwall College Group (the Group) 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.

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[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

The FDAP scrutiny coincided with an extremely challenging time for the Group. During the early part of the scrutiny, the Group experienced a significant decline in its financial status due to internal factors and sector-wide factors such as funding reductions. Internal factors included shortcomings in Group financial controls and unforeseen negative financial ramifications arising from a merger with Bicton College in 2015, which itself had an inadequate financial position. The Group was initially slow to take action to achieve the cost reductions required for financial stability and there was a loss of confidence in Group leadership at the highest level during 2015.

During the latter part of the scrutiny, the Group engaged constructively with the Education and Skills Funding Agency (ESFA) to implement a Financial Recovery Plan. This was further refreshed in July 2017 and extended to form a Group Business Plan. The senior management have benefited from the ESFA 'Fresh Start' process (an outcome of the Further Education (FE) Area Based Review) which confirmed the Group as a stand-alone provider of further and higher education in the South West. The current leadership has been endorsed by both the ESFA and the FE Commissioner and there has been conspicuously decisive leadership demonstrated by the incumbent Chief Executive Officer/Principal. The senior management team has taken concerted action to address the continuing challenges facing the Group, and deficiencies in internal financial control systems have been addressed to include more thorough and timely financial monitoring.

While significant progress has been made in addressing the Recovery Plan objectives, the journey to financial recovery is by no means complete and substantial cost savings remain to be realised. Furthermore, although higher education has been less affected by the Group's recent difficulties than other areas of its provision, a decline in higher education learner numbers presents further challenges in maintaining both the quality and financial sustainability of the Group's higher education.

Appropriate governance and management structures are in place to discharge the Group's responsibilities for higher education oversight and to maintain quality and standards. While the Executive Leadership Team and Operational Leadership Team are large groupings due to the Group's organisational complexity, these operate effectively with well-informed participation. The Group operates a detailed and comprehensive risk management policy that addresses the current Group challenges and which is appropriately implemented. Higher education provision is entirely compatible with the Group's educational objectives and mission, and is consistent with its role in widening participation and supporting the regional economy. Overall, the Group has the capacity and capability to manage the additional responsibilities associated with foundation degree awarding powers (FDAP) through the organisational and deliberative structures in place.

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

Academic standards and quality assurance

The Group has a longstanding partnership with Plymouth University through which it has developed extensive experience of operating higher education quality assurance procedures. As the partnership has matured, the University has delegated authority for some aspects of its quality framework and these responsibilities have been exercised diligently. Despite a few examples where closer adherence to processes would have been desirable, the scrutiny provided comprehensive evidence that awarding body regulations and

procedures are consistently and soundly applied. Implementation of processes is well supported through the HE Operations Team, and the academic committee structure is appropriate in both design and operation to enable effective oversight of quality and standards. The Group has developed a robust and comprehensive draft regulatory framework should FDAP be awarded, which draws on well-established practices, aligns to the UK Quality Code for Higher Education (the Quality Code) and demonstrates a mature approach to higher education.

Considerable use is made of externality in the design, delivery and assessment of programmes through extensive employer engagement and robust use of external examining. An external dimension is embedded within core quality assurance processes and the Group makes good use of its strong regional contacts to inform its higher education provision. External examining is used effectively, and reports confirm that academic standards are appropriately maintained and are broadly comparable with standards at other higher education institutions. Notably, external examiner reports verify that programme delivery has not suffered unduly from the recent financial difficulties and provide convincing evidence of the Group's ability to set and maintain academic standards should FDAP be awarded.

On the basis of these findings ACDAP concludes that Cornwall College Group meets Criterion B.

Scholarship and the pedagogical effectiveness of academic staff

The academic, professional and pedagogical expertise of the Group's lecturing staff is appropriate for programme delivery and is both recognised and appreciated by the student body. Staff demonstrate sound engagement in their subject areas and hold appropriate academic and professional qualifications, with support provided for ongoing external and in-house pedagogical development.

The Group maintains a strong portfolio of research and scholarly activities within the sector with an emphasis on student engagement in research, research-informed teaching and pedagogical research. Staff continue to produce noteworthy research outcomes in sometimes challenging conditions and have opportunities to update their professional practice through the Group's extensive network of employer contacts. Although the number of staff engaged in external activities with other higher education providers is low, academic staff are fully competent with the curriculum development and assessment design for their own provision.

The Group operates a coherent appraisal and performance management system that is adapted for staff engaged in teaching higher education and that enables development of subject expertise and professional capabilities. While the appraisal system is robust in design, a lack of central reporting limits the ability to verify current levels of implementation. A proposed new human resource management system has the potential to address current shortcomings in the collection of staff data, although there was limited evidence of progress with this development during the scrutiny period.

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

The environment supporting the delivery of foundation degree programmes

The Group places a strong emphasis on teaching and learning activities and monitors these effectively through robust quality assurance procedures. Resource monitoring is thorough at the validation stages of new programmes, and ongoing learning support materials are routinely reviewed through an effective curriculum review and operational planning process. Although some reports from external examiners, periodic reviews and annual monitoring

encourage greater resource investment, no current deficiencies that prohibit adequate delivery were identified during the scrutiny. While there are pockets of excellent practice in the application of technology enhanced learning, staff use of the virtual learning environment is variable. The use of technology to deliver cross-site teaching continued to be at an early stage of development during the period of the scrutiny.

Extensive employer networks allow the Group to access current professional practice and enhanced learning resources through work-based learning, placements and delivery within professional settings, some of which are considered of world-class quality. The Group places considerable emphasis on feedback from industry and continues to adapt mechanisms in order to obtain structured employer engagement across curriculum areas. Similarly, the Group places a strong emphasis on student, staff and employer feedback and encourages opinion and commentary through multiple channels. The Group evaluates feedback effectively and responds through appropriate mechanisms, including the student representative system, the staff appraisal process and various employment forums.

Information, advice and support provided to students throughout their studies is generally sound. Information management policies are appropriately implemented and key student protection measures, such as policies on complaints, specific learning needs, equality and diversity are clear and accessible. Effective administrative systems operate at all panels, committees and boards observed, which enables accurate monitoring of student progression and performance.

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

Privy Council's decision

The Privy Council's decision is to grant Cornwall College Group renewable foundation degree awarding powers from 17 May 2018 until 16 May 2024.

Introduction

This report provides a summary of the work and findings of the scrutiny team (the team) appointed by QAA to review in detail the evidence submitted in support of an application for foundation degree awarding powers (FDAP) by Cornwall College Group.

The application was considered by QAA's Advisory Committee on Degree Awarding Powers (ACDAP) in February 2015 when the Committee agreed to proceed to the detailed scrutiny of the application. The team appointed to conduct the detailed scrutiny comprised Professor Emeritus Edward Esche, Professor Emeritus Nicholas Goddard, Professor Emerita Diane Meehan and Mr Stephen Murphey (secretary). The detailed scrutiny was managed on behalf of QAA by Mr Derek Greenaway, Assistant Director.

The detailed scrutiny began in March 2015 culminating in a report to ACDAP in February 2018. In the course of the scrutiny, the team reviewed 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 Cornwall College Group

Cornwall College is a large general further education college operating as The Cornwall College Group (the Group) that traces its origins to 1929. It has seven campuses in Cornwall and, following a recent merger with Bicton College, a further campus in East Devon. The Group has additional education and training facilities outside of the county through partnerships with the Plymouth Skills Centre, Deep Blue Sounds music in Bristol and Plymouth, and the Centre for Housing and Support in Worcester.

The Group is one of the largest UK providers of higher education in a further education setting. The higher education programmes delivered by the Group are awarded by Pearson and four degree-awarding bodies: Plymouth University, Plymouth Marjon University (previously named St Mark and St John), Falmouth University and Bath Spa University. Plymouth University is the main awarding body, and this established partnership dates from 1978. The Group has recently expanded its partnership with Plymouth Marjon University, which commenced in 2014, adding to the programmes offered and developing a more strategic approach to oversight that until recently largely operated at programme level. The partnership with Falmouth University developed in 2015-16 for the delivery of a single undergraduate programme and the Bath Spa University relationship was established in 2016-17 for the delivery of a single postgraduate programme in education.

The Group serves approximately 30,000 students with 1,463 currently enrolled on higher education awards across 66 programmes (excluding higher apprenticeships). Approximately 1,600 staff are employed by the Group. The Group is organised into seven curriculum areas: Business and Professional; The School of Education and Professional Development; Health and Wellbeing; Science and Natural Environment; Rural Economy; Technology; and Cultural and Visitor Economy. Each area reflects different employment sectors referred to as clusters, led by a cluster director. A nominated member of academic staff in each cluster acts as the Higher Education (HE) Lead responsible for liaison with the central HE Operations Team. The HE Operations Team includes 15 full-time equivalent (FTE) staff who work exclusively to support higher education, liaising with programme teams, partner higher education institutions and providing business support.

The core region served by the Group is characterised by pockets of socio-economic deprivation, particularly in the west of Cornwall, and historically low participation in higher education. The local economy is characterised by small and medium enterprises, an above average dependence on low wage industries and significant fluctuations in seasonal

employment. Jobs in service industries account for a high proportion of all employment and, although a rural county, there has been a decline in traditional industries such as mining, agriculture and fishing.

Widening participation is core to the Group mission and the institution prides itself on the strength of vocational delivery and the embedding of employability competencies within the curriculum. The Group has contributed significantly to the widening participation agenda in Cornwall through its role as a founding partner in 2000 of the Combined Universities in Cornwall (CUC) initiative with Plymouth University. The initiative has significantly increased university-level provision in the region and raised participation rates in higher education by 15.4 per cent between 2004 and 2011. Despite successes in improving access, the region is the least represented in the UK for higher education and the Group recognises the continuing need for widening participation as a key part of its strategic approach.

Statement on progression arrangements

In line with its widening participation agenda and role in developing the local economy, the Group facilitates opportunities for students who successfully complete foundation degrees to progress to qualifications at level 6 of the *Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ). All foundation degrees have a named progression route to an appropriate BA or BSc honours degree, some of which are delivered by the Group and the remainder delivered by Plymouth University, Plymouth Marjon University or Falmouth University. Appropriate progression opportunities are identified, considered and confirmed through the programme validation process. The arrangements are outlined for students in programme quality handbooks and in the Higher Education prospectus, which is updated annually in conjunction with the awarding bodies' marketing departments. The Group also makes students aware of progression options from bachelor's degrees into postgraduate study. In terms of entry to foundation degrees, a new programme benchmarked at level 3 has been developed recently to support students who require additional preparatory input prior to progressing to science-based qualifications delivered by the Group.

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 Group Strategic Intent 2014-18 was approved by the Group Corporation Board (the Board) early in 2014 and reaffirmed in July 2017. This identifies the Group's core purpose as 'Making Learning Work' supported by seven key values and nine goals, underpinned by a 'Brilliant Learning' model. The Group Higher Education Strategy 2014-17 sets five key targets closely linked to the goals specified in the Strategic Intent. These deal with the learner experience, growth in opportunities and numbers, the creation of a collaborative and connected higher education community, strong employer engagement in the curriculum and the achievement of FDAP. Each cluster has its own 'roadmap', linked to the Strategic Intent goals to support the achievement of higher education objectives. The Higher Education Strategy was due to be refreshed at the end of the scrutiny period and the team considers the strategic framework to be appropriate in articulating and clearly affirming the strategic direction for the Group.

2   At curriculum level, there is a coherent annual planning cycle which brings together financial planning, quality assurance and resource allocation. In the autumn term each cluster engages in curriculum planning followed by operational and budget planning and the evaluation and analysis of performance. The Group operates an effective system of termly Impact Reviews through which cluster directors, curriculum leaders and senior managers examine progress made with Quality Improvement Plans (QIPs) and evaluate the impact of actions taken in each cluster. Impact Reviews consider a wide range of qualitative and quantitative information to determine peer-moderated operating grades for each cluster. The outcomes are used to monitor performance against financial and quality Key Performance Indicators (KPIs) which are regularly reported to the Board.

3   The commencement of the scrutiny in April 2015 coincided with a significant downturn in the financial position of the Group. For the year ended 31 July 2015, the Group generated an operating deficit of £6,078,000 compared with a deficit of £1,059,000 for 2013-14 and compared with a Board target of £188,000 surplus. The historic cost position was a deficit of £9,038,000 (2013-14 £705,000 deficit which compared with a target of £500,000 surplus). A revised financial forecast submitted to the Skills Funding Agency (now the Education and Skills Funding Agency) in February 2016 demonstrated a significant deterioration in underlying financial health since the previously submitted forecast. This resulted in a regrading of the overall financial status from 'Good' to 'Inadequate' for 2014-15 and a requirement to produce a Recovery Plan by 13 May 2016. This outturn prompted the issue by the Agency of a Financial Notice of Concern (FNOC).

4   During the scrutiny, the team gave extensive consideration to the reasons for the financial deterioration and the effectiveness of the Recovery Plan to be assured that the Group was a viable and sustainable going concern, a matter which had also been raised during the Further Education Area Based Review process. The reasons for the financial deterioration include those which are particular to the Group and others which constitute sector-wide challenges.

5   Due to the dispersion of Group campuses across the county of Cornwall, the traditional delivery of higher education is inherently high cost. Indeed, with the merger of Bicton College, the furthest distance between campuses is more than 100 miles. The Group commitment to extend higher education opportunities, particularly in west Cornwall, which has poor transport infrastructure, has resulted in small student group sizes. Overall, the underlying cost base of the Group for 2014-15 was significantly in excess of income. The Recovery Plan identified that core overheads, in particular premises costs, were too high and that the delivery model for the core business was no longer viable. These structural deficiencies were exacerbated by factors common to many further education providers such as a persistent decline in age 16–18 learner numbers, reduced funding and increased financial liabilities such as pension contributions.

6   An additional factor contributing to the Group financial downturn was the Bicton College merger completed on 31 March 2015. The original forecast on financial impact was positive with an estimated £2 million exceptional credit to income and expenditure. However, the actual year-end (31 July 2015) fair value exercise resulted in a £5.1 million write down in asset value arising from the auditors' insistence that the acquired assets were valued at market value rather than the planned depreciation replacement cost. This resulted in a £3 million exceptional cost in the income and expenditure accounts. Furthermore, the Bicton College operating loss at the time of merger was larger, by £500,000, than had been anticipated: a matter which was not identified in due diligence. The combination of this exceptional item and the losses on the whole College operating account led to the Group breaching two bank covenants and the subsequent reclassification of long-term debts as short term.

7   During the academic year 2016-17, senior management implemented the provisions of the May 2016 Recovery Plan, which was refreshed and updated to the current Group Business Plan adopted by the Board in July 2017. This is now an overarching Group planning document which governs financial planning. It was completed through close consultation with the ESFA via monthly meetings during 2016-17 that monitored the Group management accounts, cash-flow forecasts, risk register and tracked agreed milestones. Following the Area Based Review, which confirmed the continuance of the Group as a 'stand-alone' provider, the Group was supported by the ESFA Fresh Start process including the appointment of an external consultant as a Turnaround Director to work with the Group senior management team.

8   The July 2017 Business Plan is a detailed and comprehensive document that addresses all aspects of Group activities including market demand, the curriculum, the delivery model, financial forecasts and resourcing. The Business Plan reports the considerable progress made since the submission of the original Recovery Plan in 2016 and forms the basis on which restructuring funds could be accessed via the Transactions Unit of the ESFA. The Group was preparing to enter negotiations with the Transaction Unit after the scrutiny. The Business Plan aims to achieve financial stability and sustainability moving from the current ESFA categorisation of 'inadequate' to one of 'good' within three years. The Plan emphasises that £4,491,000 of costs need to be removed over this period for the Group to achieve financially sustainability in the absence of externally provided restructuring costs, although this figure would reduce if potential funding from the Transaction Unit is provided. However, it is worthy of note that the current Group financial grading would be 'satisfactory' if

it were able to treat short-term loans as long term (see paragraph 6 above) and negotiations on this technical point were ongoing at the conclusion of the scrutiny.

9   The Business Plan for the future delivery of higher education includes recommendations to recalibrate marketing messages to focus more on the local market: an action considered critical in stabilising higher education student numbers, which declined from 2,058 FTE in 2012-13 to 1,450 FTE in 2016-2017. The Group plans to invest in its niche higher education provision, such as the Eden Project programmes, and key areas of technology and land-based activities. Further efficiencies in delivery are planned such as greater use of directed learning, the roll-out of the 'connected classroom' and a reduction in higher education delivery hours.

10   The July 2017 Interim Report of the Turnaround Director provided Governors with reassurances as to the robustness of the planning process underpinning the 2017-18 financial plan while emphasising that far-reaching restructuring plans remain to be implemented. The team received external assurances from the Deputy Director of the ESFA (South West and South) and chair of the FNOC meetings on the likely future viability and sustainability of the Group. The conclusions of the Area Based Review that the Group should remain as a 'stand-alone' provider also indicates confidence in the future of the Group.

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

11   The nine goals of the Strategic Intent 2014-18 are widely displayed across Group premises. These goals underpin the Group higher education mission and strategy and are supported by the Brilliant Learning model, which is an essential component of the Strategic Intent. The goals are clearly reaffirmed in the terms of reference of committees, and during the summer of 2017 the new Principal/CEO spent considerable time with staff and students explaining the progress, challenges and priorities in delivering the Strategic Intent. Staff understand and engage with the Brilliant Learning model although this approach is less widely understood by students.

12   The HE Operations Team has broad responsibility for ensuring that policies supporting the delivery of higher education are understood and applied consistently by staff involved in programme delivery and support. The leadership of the team changed for 2016-17 as part of a senior management restructure and the team currently consists of 15 staff including an Operational HE Lead, HE Development Manager, Assistant Registrars and an HE Admissions Team. An HE Quality and Standards Handbook and HE Staff Handbook provide full information on relevant policies, including those dealing with quality assurance, student information, student support, appeals and complaints. These key documents are publicised by the HE Operations Team on a dedicated section of the staff intranet. The HE Operations Team issues a newsletter to staff highlighting important regulatory changes and key updates, including those emanating from the main awarding body. Staff met by the team confirmed that the HE Operations Team provides sound support and advice on policy and procedures and that communication is effective.

13   Based on its observations, the team confirms that higher education policies and systems are generally understood and largely applied in a consistent manner. This was the case at programme approval events, and at subject assessment panels at which the policies and regulations surrounding assessment were well understood by staff and appropriately applied across curriculum areas, with the HE Operations Team ensuring that proceedings were compliant with regulations. Consistency in the application of relevant regulations was also confirmed at award board level. While understanding of policies and systems is sound,

the team did note some inconsistency in the application of policies for the timeliness of assessment feedback (see paragraph 93) and in the most recent application of the annual monitoring processes for Plymouth University programmes (see paragraph 54).

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

14   Following adoption of the Strategic Intent in 2014, the Group reviewed governance structures and a set of Board subcommittees was established to cover two broad areas - strategic matters and governance.

15   The three strategic committees identified at that time were the Delivery and Development Committee, Finance and Resources Committee and the Excellence and Experience Committee. The Delivery and Development Committee was intended 'to support the development of a coherent career-led curriculum aligned to the region's core industrial sectors and those with growth potential'. The essential objective of the Excellence and Experience Committee is to 'support the development of the culture and processes to deliver continuous improvement across the Group in all aspects of student and staff experience' and the Finance and Resources Committee role is 'to support the Board in securing the solvency of the Group, effective and efficient use of resources, strong financial performance and the delivery of high, quality physical resources for its learners and staff'.

16   On governance matters, an Audit Committee 'advises the Board on the adequacy and effectiveness of the Group's assurance framework including systems of internal control and arrangements for risk management, control and governance processes'. A Search and Governance Committee has responsibility for undertaking search and selection of Board members, succession planning and for advising the Board on procedures to promote effective governance.

17   The terms of reference for the strategic committees were reviewed during 2016 and minor modifications made. At the conclusion of the scrutiny, a review of governance was ongoing under the auspices of a Governance Review Group (GRG) established in May 2017. The Delivery and Development Committee was removed in July 2017 and the work incorporated into the remit of the Excellence and Experience Committee. This is expected to reduce the time demands on managers and governors and the Group is considering adoption of the Carver model of governance at an appropriate time in the future. Future work for the GRG will involve consideration of the fitness-of-purpose of the governance structure, the frequency, focus, location and timing of Board and committee meeting arrangements and the flow of information from the Principal/CEO to the Board and stakeholders. An Association of Colleges National Leader of Governance has been appointed as an independent party to provide support and challenge to the work of the GRG.

18   Observations of meetings of the strategic committees confirms that these operate in a purposeful manner, are well conducted and are supported by detailed documentation. The Group recognises that the circumstances that led to the issue of a FNOC, raises questions about the effectiveness of governance and the degree to which any deficiencies have been rectified constituted an important matter for consideration by the team. While the Group acknowledges that the Board accepts responsibility for failings relating to financial management, the Group stresses in mitigation that there were few signals upon which early action could have been taken and that the financial information supplied to governors was unreliable and incomplete. The team confirms that while the Finance and Resources Committee was aware of a deteriorating financial situation in the autumn of 2015, based on the Group's Financial Plan 2015-17 (submitted before the audited accounts for the year

ending 31 July 2015 were available) the Skills Funding Agency grading was 'Good' for both 2014-15 and 2015-16.

19   Strategic oversight of higher education is undertaken by the Higher Education Management Committee (HEMC). This committee has responsibility for ensuring developments in the portfolio are coherent with the overall Strategic Intent, providing advice on external academic policy issues affecting higher education, and maintaining oversight of KPIs and quality processes, outcomes and actions. Membership includes cluster directors which facilitates effective management and coordination of higher education across curriculum areas. The HEMC is an effective operational body that serves a valuable function by specifically focusing on higher education policy, practice and delivery, and having a student-centred approach.

20   The senior deliberative forum for higher education across the Group is the Higher Education Academic Board (HEAB). The essential role of HEAB is 'to ensure that Group higher education is governed, managed and administered appropriately'. Its membership includes senior managers, a minimum of three cluster directors, a Board member, a student representative and a representative of academic staff. HEAB fulfilled a key role in developing the Higher Education Strategy in 2015, and undertakes ongoing responsibilities for areas such as production of the HE QIP and oversight of quality and standards. Based on observations, the team concludes that the HEAB and the HEMC exercise effective oversight of higher education and inform the strategic direction.

21   The governance structure implemented in 2014 included termly Cluster Advisory Boards, which aimed to bring together influential and expert business leaders to inform the development of specialist curriculum provision for local learners, employers and communities. Early team observations of Cluster Advisory Boards indicated that securing the level of employer engagement envisaged was challenging and there was a lack of clarity among members of the purpose and remit of the Boards. By the end of the 2015-16 academic year, the Group recognised that Cluster Advisory Boards were not as effective as anticipated and a looser engagement arrangement was introduced for 2016-17 tailored to individual clusters. Formal termly meetings were discontinued except for Rural Economy and Science and Natural Environment where Cluster Advisory Boards had proved successful. The Group now places greater emphasis on Community Engagement Events and showcase activity rather than the Community Councils and Locality Boards planned in 2014. A Community Council continues to operate at Bicton as part of the original merger conditions. This serves to raise the local profile of the Group and is expected to be merged with the Rural Economy Cluster Advisory Board in the medium term.

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

22   The Group is headed by a Principal/CEO who is responsible for the overall strategic direction, delivery and organisational development. The Principal/CEO is supported by three senior post-holders: a Group Director of Finance and Resources (responsible for Financial Strategy, Information Systems and Data Management Strategy, Estates and Technology Strategy); a Group Director of Quality and Curriculum (which includes overall responsibility for higher education as Group HE Lead); and a Group Director of Development (Business Development, Marketing and Sales Strategy).

23   The Group Executive Leadership Team (ELT) has overall responsibility for delivery of the institutional KPIs and comprises the above senior post-holders and the Directors of Human Resources, Academic Studies, English/Maths/Foundation Learning and the directors of the seven curriculum clusters. The ELT normally meets fortnightly and at the end of the scrutiny period had a vital role in the delivery of the revised Recovery/Business Plan. An

Operational Leadership Team (OLT) focuses on operational delivery of the Strategic Intent. The OLT is comprised of ELT members with the addition of three campus heads, and is attended by Heads of Group Services (Marketing, Quality, Information Management/Data Services and Estates) as required. These two relatively large groupings reflect the organisational complexity of the Group in terms of curriculum clusters and multiple campuses and were observed to operate effectively with well-informed participation.

24   In June 2016, the Principal/CEO resigned, followed a month later by the Group Director of Finance and Resources who had been in post since March 2015. The then Deputy CEO/Principal was appointed to lead the Group in an acting capacity and a new Director of Finance was appointed in December 2016. The Acting Principal was confirmed as Principal/CEO in March 2017 after a competitive appointment process. The delay in appointment was due to the Board awaiting the completion of the Area Based Review to ensure continuity during the consultations and negotiations.

25   Following his initial appointment in an acting capacity, the team observed conspicuously decisive leadership qualities demonstrated by the current CEO/Principal and ELT who the Board considers have worked frenetically during the academic year 2016-17 to deliver a workable Business Plan. This has been recognised internally with the Chair of the Board paying tribute to the 'exceptional efforts' and externally, with the Turnaround Director's Interim Report noting that the senior team 'appear to be acting together as a committed, collegiate management team…brought about by the management and direction given by the current CEO'. The capability of the current Group leadership has also been endorsed by the Office of the FE Commissioner.

26   Until summer 2016, responsibility for the operational management of higher education was discharged by a Director of Higher Education. This post is no longer in place and since then, the Group Director of Curriculum and Quality has retained responsibility for strategic leadership while day-to-day operational matters are overseen by an HE Operational Lead, an arrangement which was observed to be effective. For example, in June 2017 the Group gained a highly creditable Silver rating in the Teaching Excellence Framework (TEF) and a confident and optimistic presentation was given to the Board in July 2017 by the HE Operational Lead and the Head of HE Development (who is also a QAA reviewer and a TEF assessor) on TEF criteria with a focus on progressing to Gold status. At the end of the scrutiny period, the Group appointed a new Group Director of Quality and Curriculum to replace the current post-holder who retires at the end of 2017 after twenty-seven years' service. This is considered a key appointment in the management and oversight of higher education.

27   Effective leadership is also provided by Board members, although the team notes that collectively, the Board and its subcommittees cannot be completely absolved of a share of responsibility for the deterioration of the Group financial position in 2015. For example, the Group recognised that the inherent risks of acquiring Bicton College were not fully appreciated by the Audit Committee. An internal review of the 2014-15 external audit process in April 2016 (the completion of which was much delayed due to unforeseen complications arising from the merger) recognised that mistakes had been made in the audit and a number of recommendations have since been implemented. The Recovery Plan also recognises issues in how the 2014-15 budget was set and that tracking the cost efficiency savings plan was not sufficiently rigorous, resulting in shortfalls and delays in achieving necessary savings. The Board considers that the difficult circumstances experienced in 2015-16 have strengthened the Board overall. Beyond oversight of the Group affairs and strategic direction, the Group recognises that governors have a key role in overseeing learning, teaching and assessment and examples of their proactive involvement includes participation in Impact Review meetings and representation on the HEAB.

28   A new Board chair came into post for the start of the academic year 2016-17 after a planned and phased transition. The roles of Chair and Vice Chair were reviewed by the incoming Chair who has a depth of experience in higher education management. The Chair now leads on academic issues and liaison with students and staff, while the Vice Chair leads on finance and relations with the business community. Governors are drawn from local business and employers with a mixed skill-set including education and finance. The overall Board capability has been reviewed in the context of the current governance review (see paragraph 17) and as existing governors come to the end of their terms, additional financial management expertise will be sought to strengthen this area.

29   As part of its Business Plan, there is increased emphasis on employee development and career planning, with support for aspiring and established leaders and managers embedded in continuing professional development provision. Higher education staff confirmed that they have access to 'future leaders' programmes and that appraisals identify training needs.

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

30   There was widespread consultation in the development of the Strategic Intent 2014-18, including over 70 external contributors to 'The Big Conversation' drawn from all sectors of the Cornwall regional economy. Staff confirmed their involvement through site presentations and email exchanges, although evidence of student input was more limited. The current CEO/Principal attaches great importance to ensuring that current Recovery/ Business Plan developments are effectively communicated to staff, students and other stakeholders. The Principal/CEO visited all sites during the latter part of 2016-17 and the Group internal communication medium 'Insight' was used to this end. Increasing feedback from the Students' Union is also seen by the Group as a priority. Academic staff confirm that communication of information on higher education policies and Group developments via such media as Insight, focus groups, managers meetings and the HEMC is effective.

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

31   The performance of the Board and individual governors is undertaken effectively through an annual self-assessment supplemented by one-to-one meetings with the new chair. Following the issue of the FNOC in 2016, a review of the 2014-15 accounts preparation process was undertaken, which identified several shortcomings both internally and externally. Recommendations to rectify these deficiencies have since been addressed. In particular, following recommendations from an external review, systems have been changed to ensure that the month end and management accounts production process is sufficiently robust to ensure that financial information provided to management is accurate and reliable.

32   At curriculum level there is a coherent annual monitoring process, through which programme teams reflect on key monitoring data and produce annual reports and action plans. This process is well-established although some shortcomings in its most recent application for Plymouth University programmes are noted below (see paragraph 54). The HE Operations Team uses programme annual reports to produce the Group HE Self-Assessment Report (SAR) for consideration at the HEAB and the Excellence and Experience Committee. Recommendations from the Committee form an item for information, discussion and approval at the Board. The SARs produced are detailed, comprehensive and highlight areas for improvement. Areas identified from the 2015-16 SAR include strengthening the higher education learner voice within the Group, improving achievement

and progression through increasing the quality of academic support, and ensuring that an appropriate level of IT support and Learning Centre Resource is available on all campuses.

33   The annual HE SAR informs the Group HE QIP which is structured around the expectations of the Quality Code. This provides an effective means by which policies, systems and activities are monitored and reviewed. For example, the most recent HE QIP available to the team reports that checks on adherence to assessment feedback deadlines have been completed (see paragraph 93), standardisation and moderation of marks in some curriculum areas has been addressed and improvements have been made to course organisation and management. This latter area had been the subject of student complaint in some areas and while this issue remains an area for further improvement, the regular complaints reports at HEMC and HEAB show a reduction of student complaints relating to course organisation and management.

Academic risk and change management strategies are effective

34   The Group operates a comprehensive Risk Management Policy that is regularly reviewed and improved, such as in July 2017 when adjustments were made to the identification, description and scoring of risks. Graded risks inform operational risk management plans and the highest rated risks are automatically included on the risk register and plotted on a graph to enhance visibility to the Board. The Policy has clearly articulated aims and objectives and defines the respective roles and responsibilities of the Board, Audit Committee and senior post-holders. Cluster directors and professional services managers produce and update risk management plans and communicate concerns to the ELT. The Policy is supported by a detailed Board Assurance Framework, which is compiled by the Corporation Secretary and senior post-holders. This provides a single record of assurance data sets, and reports available to the Board link items to the relevant committee, responsible senior post-holder, applicable risk and Strategic Intent goal.

35   The highest rated risks in the most recently available Annual Risk Management Report relate to finance, information technology, marketing and competition. These are linked as the level of funding is insufficient to support the current mode of delivery and the decline in learner numbers further reduces income. Inadequate IT also impacts on learner resources and Group decision-making. This latter concern has been addressed by the progressive roll-out of an updated and consolidated IT package and the ongoing financial and marketing issues are incorporated in the July 2017 Business Plan. Overall, the team concludes that the Group operates a comprehensive and detailed risk management framework that addresses the current Group challenges. The most recent Internal Audit Report available to the team reports that the Group 'has an adequate and effective framework for risk management, governance and internal control'.

36   There is full recognition at Group level that repeated restructure and reduction exercises can impact adversely on staff engagement and that effective change management needs to address the challenges of reorganised, reshaped and expanded roles and the retraining required. In July 2017, Board members participated in an externally led change management seminar and the July 2017 Business Plan sets out a clear trajectory for achieving internal cultural change.

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

37   Academic standards are overseen effectively by the HE Operations Team through the HEMC and the HEAB structure. The Academic Regulations Subcommittee is responsible to the HEAB and oversees the academic standards of higher education provision through broad membership that comprises the HE Operations Team and cluster representatives. As noted above, the HE QIP is helpfully modelled on the Quality Code and the most recent QIP

available to the team notes improvements to internal programme approval procedures in relation to the Quality Code.

38   Team observations of new programme approval events confirm that proposals take account of the Quality Code, the FHEQ, the *Foundation Degree Characteristics Statement* and relevant Subject Benchmark Statements (see paragraphs 44-47). Although there is variation in the quality of documentation that supports these events, proposals are subject to robust and searching scrutiny by internal and external panel members.

39   Observations of award boards confirms that policies and regulations pertaining to assessment are followed appropriately and the HE Operations Team is well equipped to advise course teams in interpretation and application. This provides further assurance that academic standards will not be put at risk if FDAP were to be awarded.

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

40   The Group recognises that its regulatory and quality framework requires institutional ownership and should not be reliant on that of its main awarding body. An appropriate higher education regulatory framework has therefore been developed in preparedness for the future exercise of FDAP. All internal policies and procedures have been mapped against the Quality Code and the framework continues to be incrementally augmented and refined as necessary (see paragraph 43). Overall, the team considers that the Group has the capacity and capability to manage the additional responsibilities associated with FDAP through the organisational and deliberative structures in place.

B   Academic standards and quality assurance

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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.

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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

41   The Group currently delivers programmes through partnership arrangements with Pearson and four degree-awarding bodies. Partnerships are appropriately governed by formal agreements and each programme is delivered in accordance with the relevant awarding body's regulatory framework. The relationship with its main awarding body, Plymouth University, has matured over time and the University delegates responsibility for aspects of its framework including admissions, teaching and assessment, the chairing of subject assessment panels and annual programme monitoring. There is close liaison between the University and the Group, particularly at operational level through the University Academic Liaison Persons and Faculty Partnership Managers.

42   Observation of meetings and reports arising from processes such as programme approval, annual monitoring, periodic review, assessment boards, Programme Committee Meetings (PCMs) and external examining, demonstrate broadly consistent implementation of the awarding bodies' regulations and procedures. The team observed a few instances where closer adherence to processes would have been desirable, for example in implementation of the annual monitoring processes and the use of student representatives on programme

approval panels, albeit these shortcomings have been recognised by the Group and are being addressed (see paragraphs 51 and 53).

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

43 A regulatory framework appropriate for the granting of its own higher education awards has been developed by the Group in a mature and reflective manner. Overarching procedures for quality assurance are appropriately aligned with the Quality Code and set out in a Quality and Standards Handbook available on its staff intranet. The Group has continued to develop its own academic regulations which draw upon aspects of Plymouth University regulations. A new Academic Regulations Subcommittee was established in 2016-17 to further support development of the regulatory framework should FDAP be awarded. Suitable supporting policies and procedures, some of which are already in operation, have also been developed specifically for higher education including: HE Terms and Conditions; HE Assessment Policy and Assessment Procedures; an HE Student Charter; and an HE Complaints Policy. A new Research and Scholarly Activity sub-group of the HEMC has been established to support the development of academic practice and a new HE Programme Approval Committee is planned that will report to HEAB and allow more time for the consideration of programme proposals. These additions demonstrate the strengthening of infrastructure in areas of additional responsibility should FDAP be awarded (see paragraphs 50 and 83).

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 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)

44 The Group has effective processes that ensure awards are offered at levels that correspond to relevant levels of the FHEQ. Alignment with the FHEQ is considered during programme design and development and is verified during programme approval events (see paragraphs 49-51).

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

45 The College has mapped its higher education management processes against the Quality Code. This exercise highlighted a few areas for development in the policy framework which have been addressed during the period of scrutiny in readiness for FDAP (see paragraph 43). The HE QIP is also modelled around the Quality Code (see paragraph 37).

46 Programme specifications are in place for all programmes, which include reference to the FHEQ and relevant Subject Benchmark Statements. The programme specification template aligns with national guidance and meets the requirements of the awarding bodies. Programme specifications form part of the documentation considered during the programme approval process and are subsequently made available to students and incorporated into

programme quality handbooks. While there is some variability in student feedback on the accuracy and helpfulness of the programme information, overall, students met by the team confirmed satisfaction with the information provided.

47   Where relevant, programme design and approval takes account of the requirements of professional, statutory and regulatory bodies (PSRBs) such as in the case of the FdSc Veterinary Nursing programme. Some programmes, such as FdSc Computing, Networking and Software Development and FdA Housing, incorporate professional qualifications and information relating to accreditation is included in programme documentation.

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

48   Evidence from programme approval events, HEMC meetings and the TEF submission demonstrates that advice from external peers is routinely sought and effectively used in setting and maintaining comparability of standards. Engagement with employers is a Group prerequisite during programme development, and programme approval and periodic review panels include external academic peers and industry representatives as required by the degree-awarding bodies. As noted above, PSRB requirements are also considered in programme design, development and approval where relevant. External examiners are appointed to comment on the comparability of standards within their reports (see paragraphs 69-71).

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 study

49   The Group programme development and approval procedure outlines the process to be followed prior to submitting a proposal to a degree-awarding body. Programme development is required to align with Group strategy, demonstrate a demand from business sectors, provide information on financial viability, student demand and any requirements for additional resources, including staffing. The Group conducts its own internal site approval process for programmes that are wholly, or in part, delivered away from the main campus sites. Academic staff met by the team confirmed that support is provided by the HE Operations Team and staff generally demonstrated a good understanding of the programme approval requirements. The team observed a stage one approval event where the programme lead and approval documentation were not adequately prepared for the event, although this was not typical of the standard approach.

50   Until the current academic year, new programme proposals were initially considered at the HEMC before being considered at the HEAB for approval, rejection or referral for further work. The Group has recently set up an HE Programme Approval Committee (HEPAC) for 2017-18 that will feed into the HEAB to allow time for more detailed consideration of programme proposals. The team considers this to be a positive development in light of the increased responsibility in this area should FDAP be granted. Following completion of the internal process, a full proposal is sent to the awarding body. While final approval processes vary slightly across the awarding bodies, all approval events include participation from external peers.

51   For the main awarding body, programme approval normally follows a two-stage process, although the team observed one exception where a programme was approved through a hybrid single stage event, permitted by the process. Stage one ensures that all procedures have been followed appropriately, that all external reference points are

addressed, and that programme approval documentation is fit for purpose. This stage involves an internal panel and is chaired by a University representative. Although the team observed variation in the number and extent of changes required following this stage, the process clearly supports programme teams in refining documentation and preparing for stage two. Following documentary changes, a stage two event takes place organised and chaired by the University and including appropriate external representation on the panel. While stage two panels observed by the team consistently included external members, student representatives were absent from the panels observed, despite the awarding body guidance stating that a student should normally be included. The Group has recognised and is addressing this issue for future events.

52   Annual monitoring processes are aligned with the requirements of the awarding bodies and Pearson. A programme committee, comprising staff and student representatives, is convened for each programme which meets at least twice per year. These work to standard agendas and are responsible for overseeing the production of annual monitoring reports. For the main awarding body, the first meeting of the academic year produces an Annual Programme Monitoring (APM) report and Programme Action Plan, which include a range of data and feedback including performance data, external examiners' reports, outcomes from the Student Perception Questionnaire (SPQ) and National Student Survey (NSS). Action plans identify areas for development and good practice. Action plans and minutes from PCMs are submitted to the University twice a year: following the autumn PCM and following an update at the spring PCM. Both PCM minutes and action plans feed into the Joint Board of Studies (JBS) attended by Group and university representatives. The action plans also inform the Group HE SAR and HE QIP. The Group intends to retain this approach to annual monitoring should FDAP be awarded, to ensure parity between Group and Plymouth University awards.

53   The team noted some instances where staff demonstrated a lack of clarity on updating action plans at PCMs. For example, in several meetings observed in autumn 2016, while the programme leader ran through the action plan from the previous year and discussed current issues with student representatives, the updated action plan was not agreed at the meeting as stated in the University's guidance. In addition, at the January 2016 JBS meeting, the University reported late submission of a few action plans. The report of the periodic review of the Rural Economy Cluster in January 2017 also noted that the annual monitoring process was not consistently followed in relation to PCMs and action plans. In response, the Group noted some difficulties in meeting the timescales set by the University, but that action had already been taken to resolve the situation.

54   Plymouth University has recently undertaken a periodic review of its higher education programmes delivered by the Group. Periodic review operates on a rolling programme, with an interval of five to six years between successive reviews and is conducted on a cluster basis. Review panels include external members nominated by the Group who meet with staff and students and produce reports that identify good practice and recommendations for action. Reports from the 2017 periodic review events consistently confirm that the academic standards and quality of programmes within each cluster are being maintained and that appropriate opportunities and support for learning are made available to students. Positive issues raised include the high quality of teaching, student academic and pastoral support, the use of live projects with industry clients and engagement with employers. Areas for further work include increased higher education resources and staffing in some clusters (see paragraphs 100 and 103) and the need to update some long-standing programmes. The Group is addressing these issues appropriately through the resulting action plans and through its routine planning and quality assurance procedures.

55   The team considers that arrangements for programme approval and periodic review are robust and consistently applied, although some minor shortcomings in the annual

monitoring process have been identified which the Group is seeking to resolve. Processes incorporate an appropriate external dimension and the College monitors the effectiveness of annual programme monitoring, self-assessment processes and periodic review through its committee structures.

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

56   Resource allocation is considered as part of the annual curriculum review and operational planning process whereby cluster directors outline the curriculum offer for the following academic year and outline resource requirements, including staffing. The plans are considered by the Senior Executive Team (SET) prior to sign off. Specific responsibility for curriculum delivery and development rests with the Excellence and Experience Committee (and formerly the Delivery and Development Committee). The Group confirms that it does not pursue programme developments in areas that cannot be sufficiently resourced, and staff met by the team demonstrated familiarity with the resource allocation process. The arrangements
in place for resource allocation are explicitly linked to planning and are undertaken appropriately, although the recent financial situation has placed constraints on budgets.

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

57   The Group's stated approach to learning and teaching is 'to provide learners with a high-quality experience celebrated through vocational and academic achievement, personal development and employability'. Strategies for learning, teaching and assessment are expressed in the Brilliant Learning model and the HE Assessment Policy and Assessment Procedure. Staff met by the team noted that the model provided a useful framework for the development and delivery of teaching, although student awareness of the model was low. A revised Teaching and Learning Plan, relevant to both HE and FE, has been developed which 'supports and promotes individual learner progress and achievement through brilliant learning and the development of brilliant teaching that stretches and challenges all learners'. The plan clearly outlines aims and priorities for 2017-18 and responsibilities for learning and teaching within the clusters, and provides a structured approach to the achievement of the Group's learning and teaching strategy.

58   Assessment strategies are carefully considered at the planning and approval stages of new programmes and subsequently reviewed through the annual programme monitoring process. A range of formative and summative assessment methods are used. Assessment is appropriately designed to demonstrate that learning outcomes are met, and programme specifications include a mapping of learning outcomes against teaching, learning and assessment methods. Assignment briefs are clear and include details of intended learning outcomes together with marking criteria and submission dates. Assessment of learning outcomes that link to work-based/related learning activity are mapped in programme specifications for foundation degree programmes.

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

59   The programme approval process clearly sets out the procedure to be followed prior to a proposal being sent to the degree-awarding body and the team observed multiple examples of this process in practice. Plymouth University programme approval follows a two-stage process, which clearly outlines the changes required to documentation at each stage and staff demonstrate familiarity with the process. This two-stage process is effective in ensuring that documentation is fully developed during the approval process (see paragraph 51).

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

60   FdSc Forensic Science is the only programme with alternative pathways. While two pathways are possible through the selection of optional modules covering psychology or incident investigation, the programme remains coherent with only one award title regardless of the option choices. The pathways are clearly outlined for students in the programme quality handbook and delivery is overseen in the same way as all other programmes.

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

61   The Group's internal programme development process ensures confirmation from relevant support services that appropriate resources are in place, and that additional resource needs are identified, prior to proposals being sent to the awarding body. The Group states that Student and Learning Resource Services staff are essential members of planning and approval committees. While the team confirms that resource requirements are explored with service staff during the programme development process, they were not routinely included in the programme approval events observed.

62   Commentary on learning resources and student support is included as part of the annual monitoring process described above (see paragraph 52). Feedback is gathered from students at PCMs and actions are incorporated into programme action plans. Annual monitoring and periodic review processes usefully support the monitoring of adequate resource provision. Areas for development have been reported through these mechanisms and issues identified include levels of academic staff resourcing in some areas, the need to update specialist equipment and access to IT resources (see paragraph 100 and 103). These areas for development are subsequently addressed through the Group's annual planning cycle (see paragraph 56). Collectively, these processes are effective in identifying resource issues.

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

63   Arrangements are in place with a few external organisations for the delivery of all, or part of, higher education programmes away from the main campus sites. These arrangements vary from the use of external premises for delivery by Group staff, such as the partnership with the Eden Project, to courses delivered in partnership with external organisations who teach on programmes and/or provide resources, such as the partnership with DBS Music which has centres located within the Group's Camborne campus, in Plymouth and in Bristol. In all cases, Group policies and processes are adhered to and appropriate. For example, the Group undertakes its own site approval visit, external examiners visit delivery sites and relevant meetings are held on site with staff and students present. HE Senior Tutors, library and other support staff work across sites and assurance is

achieved through oversight by the HEMC and the HEAB. The team notes that challenges remain in some off-site locations regarding resource provision and student integration (see paragraph 100).

64   All programmes are expected to include opportunities for work-based learning, work related-learning and/or placements. There is widespread evidence of such opportunities being provided in programmes, which is highlighted as good practice in some periodic review reports. However, students met by the team highlighted variability of practice in relation to the provision of work-based learning. This was also raised in a recent external examiner report and periodic review report and the Group is addressing the issue through the resulting periodic review action plan.

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

65   The Group is responsible for maintaining the academic standards and quality of the higher education programmes, and is accountable for planning, design, approval and review. As outlined above, standards are defined through the programme development process and the Group operates effective processes to ensure that key reference points such as the FHEQ and Subject Benchmark Statements are appropriately addressed at the point of programme design and development (see paragraphs 44-47). The maintenance of standards is confirmed through the annual monitoring and periodic review processes. The former includes the self-assessment process, which applies to both further and higher education provision and is overseen through the management structure (see paragraphs 32 and 33). External examiner reports consistently confirm the appropriateness of the threshold standards set in relation to the FHEQ and that these standards are being achieved. All reports from the recent Plymouth University periodic review events confirm that standards are being maintained.

Assessment criteria and practices are communicated clearly to students and staff

66   The assessment requirements and academic regulations followed by the Group are those of its awarding bodies. Staff are provided with a comprehensive staff handbook which sets out the Group approach to assessment and provides links to relevant regulations and guidance. A Group HE Assessment Policy and Assessment Procedure clearly outlines roles and responsibilities in relation to assessment and sets out requirements and practices, including the internal moderation process. Although a recent cluster periodic review identified an area for development regarding communication to staff on the HE assessment strategy, staff met by the team confirmed that currency with assessment policies and practices is maintained through staff development days, programme-level meetings and through support from the HE Operations Team. The team observed that staff attending subject assessment panels and award boards demonstrate good knowledge and understanding of regulations and assessment policies and procedures.

67   Once enrolled, students receive detailed information including programme specifications, handbooks and module guides. A detailed assessment schedule for each stage of study is also provided at induction. Module guides contain assessment briefs which clearly indicate the linkage between learning outcomes and assessment criteria, as well as submission and assessment feedback dates. Student handbooks direct students to the relevant academic regulations of the degree-awarding body. Students met by the team confirmed that sufficient information is received on assessment, which clearly outlines assessment expectations. One area where there was less clarity was in relation to timing of assessment feedback to students (see paragraph 93).

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

68   Assessment strategies, including the range of assessments used, are considered at the planning and approval stage of new programmes and reviewed annually through the annual monitoring process. Module learning outcomes are mapped to the module assessment and the assessment criteria. All programmes are expected to include work-related and/or work-based learning and for foundation degrees, assessment of work-related learning outcomes is mapped out in the programme specification.

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

69   Appropriately qualified subject and award external examiners are appointed to all higher education programmes and attend subject assessment panels and award boards respectively. An internal procedure is used to identify potential external examiners who are then appointed by the awarding bodies. Standard agendas include a check on the status of the current external examiners.

70   External examining processes are managed by the HE Operations Team including the receipt and circulation of reports and responses. External examiners comment on draft examination papers, review samples of assessed student work and report annually on the comparability of standards, assessment practice, work-based learning, the conduct of assessment boards and progress on actions from previous reports. External examiner reports reviewed by the team are generally favourable and make many positive comments on areas such as the clarity of assignment briefs and marking criteria, the support available to students, the extent and usefulness of assessment feedback, the range of assessment methods and the use of live client briefs in project work. Overall, reports confirm that the standard and consistency of marking is satisfactory, although some issues have been raised regarding timeliness of feedback, over-assessment and the adequacy of staffing and physical resources (see paragraphs 93, 100 and 103).

71   Formal written responses are made to external examiners and the team saw evidence of thorough responses being provided by programme leads, signed off by a designated member of the HE Operations Team. Most external examiners' reports confirm that comments from the previous year have been satisfactorily addressed. External examiners are encouraged to meet with students at an interim meeting and their reports are discussed at PCMs and made available to students via the virtual learning environment, although engagement with examiners and their reports was low among the students met by the team.

72   The Group's draft regulatory framework, prepared in readiness should FDAP be awarded, contains a section on external examining, which is aligned with Chapter B7 of the Quality Code.

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

73   Plymouth University delegates the chairing of subject assessment panels to the Group. Agendas, student data and the production of results are standardised and in addition to external examiners and academic staff, relevant staff from the HE Operations Team attend to ensure consistency of practice. Team observations of subject assessment panels and award boards demonstrate that these operate effectively and that assessment

regulations are consistently and appropriately applied. The outcomes from subject assessment panels feed into award boards, which are managed and chaired by the respective degree awarding bodies.

74   External examiners express satisfaction with the reliability and validity of assessment. Assessment is internally and, where appropriate, externally verified and moderated. The Group's internal moderation process has a positive impact on assuring the reliability and validity of assessment and external examiners consistently express satisfaction with the assessment processes and instruments. External examiners' reports feed into action plans produced as part of the annual monitoring process, which in turn inform the HE SAR and QIP documents used by the Group to monitor the academic standards of programmes and to inform forward planning (see paragraph 33).

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

75   Arrangements for programme closure follow the requirements of the degree-awarding bodies and allow for programmes to be suspended or discontinued. Responsibility is shared between the parties and the team reviewed evidence demonstrating that safeguarding the student experience is considered central to this process. Although several awards have been discontinued, the Group confirms that no programmes have been closed that affect currently enrolled students. In the January 2016 JBS meeting, Plymouth University noted that some programmes remained too long under suspension of recruitment without being discontinued. In response, the College has recently discontinued some programmes, and although a number of programmes remain under suspension, the new Business Plan approach provides a mechanism to evaluate current and future programme viability.

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

76   A rolling process of self-assessment is undertaken which is integral to the operation and oversight of programmes and is rigorously implemented. The annual self-assessment process includes curriculum clusters and professional service areas generating SARs and QIPs that culminate in a Group SAR and QIP that is presented to the Excellence and Experience Committee for comment and approval in November and presented to the full Board in December each year. The self-assessment process is clearly documented, and the approach is congruent with the monitoring requirements of the degree-awarding organisations. For higher education, a separate HE SAR and QIP are produced by the HE Operational Lead, which are monitored on an ongoing basis through the committee. The HE SAR document, and the ongoing monitoring and review of the QIP through the committee structure, is thorough and the team observed that the Group reflects critically on its strengths and weaknesses through this process.

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

77   The annual monitoring and self-assessment process includes the monitoring of student achievement against intended learning outcomes. Action plans arising from annual monitoring are considered at programme level and the HE SAR and QIP are regularly and effectively monitored through the committee structure. Appropriate action is taken as a result of these monitoring processes to improve the student learning experience.

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

78   Extensive engagement with employer communities is achieved and the team observed multiple examples of the Group's engagement with employers. The 'extensive and consistent use of employers in the design, review and assessment of courses' was also noted in the findings of the TEF Review Panel. External expertise is embedded in teaching and learning through the facilitation of student placements, the provision of real-life assessment projects, the inclusion of guest speakers and through employer forum meetings and Cluster Advisory Boards (CABs). Appropriate externality is used on approval and periodic review panels and external members are drawn from both academic and employer communities (see paragraphs 86-87).

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

79   Key mechanisms cited by the Group as evidence of its culture of continuous improvement and enhancement include annual monitoring and review, the use of management data and performance indicators, feedback from programme approval and periodic review processes, external examiner reports, student feedback and input from employers. The team confirms that the College has effective mechanisms for encouraging continuous improvement of its provision. In addition to the mechanisms above, the Group also carries out termly Impact Reviews that evaluate the impact of actions taken to improve performance (see paragraph 2). Recurrent poor outcomes for a curriculum area become an area of special focus with more frequent support and monitoring, which ensures that issues are appropriately addressed. The impact of improvement work is reported to the SET and the Board through the Excellence and Experience Committee.

80   The team considers that a comprehensive range of performance data including admissions, progression, achievement and retention data, and internal and external survey feedback are routinely considered at HEMC, HEAB, SET and the Board and that action is taken as appropriate. Good practice is also identified and disseminated through the annual monitoring, periodic review and self-assessment processes previously described.

C   Scholarship and the pedagogical effectiveness of academic staff

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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

81   Academic staff demonstrate appropriate academic and professional expertise. From a staff base of 165 (47 full-time, 94 part-time and 24 associates), the most recent data available to the team confirms that the large majority of academic staff are qualified to at least one level above foundation degree: 76 per cent have a bachelor's degree, 25 per cent have a master's degree, and 14 per cent have a PhD. Over the course of the scrutiny, contracted staffing numbers changed: full-time decreased from 66 to 47, part-time slightly increased from 92 to 94, and associate increased from 13 to 24. Academic staff met by the team regularly demonstrated both subject expertise and engagement with the pedagogic development of their discipline through, for example, membership of subject associations, learned societies and professional bodies. Students met by the team agreed that academic staff are well qualified with appropriate academic and professional experience, with some commenting that lecturers 'are the reason why we are here'.

82   In terms of the qualifications, 24 per cent of staff hold professional qualifications and 79 per cent have a teaching qualification (nine per cent of which is specific to a higher education context). The Group subscribes to the Higher Education Academy (HEA) and has staff who are fellows, senior fellows and associate fellows, and continues to support others in gaining fellowship, although the team was unable to fully reconcile the exact number of current HEA fellows from the data provided. The Group also conducts in-house pedagogic development and training and the recent TEF Silver ranking provides an indication of solid pedagogical achievement.

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

83   The Group continues to build upon the good practice identified in the 2012 QAA Integrated Quality and Enhancement Review which noted 'the College's support for scholarly activity by a large number of staff results in an impressive output of research'. This approach is managed through the appraisal and performance management process (see paragraphs 88-89). The Higher Education Research and Scholarly activity subcommittee of the HEMC oversees research activity, and for Group-funded projects, an annual report is submitted to SET and HEAB which monitors activity. The report is also used to verify HE QIP action points for research and scholarly activity and to inform individual annual appraisal and performance management for HE staff. The Higher Education Conference disseminates research output, and work funded by the Group is noted biannually in the overarching Scholarship Update list. Students are also involved in Group research projects which they value highly.

84   The Group attracts sponsorship, funding for applied research, consultancy and academic development projects due to its extensive network of industry contacts and collaboration with higher education institutions. It has participated in European Union social funded projects in collaboration with Plymouth University. The Group supports staff in

achieving higher degrees, and the number of staff holding a bachelor's degree increased by 18 per cent over the scrutiny period. Efforts are being made to engage more staff in research, although this remains a challenge given the limited funding, heavy teaching workloads and lack of a formal, Group-wide mechanism for remission to contractual teaching obligations. Despite these limitations, the research output continues to be significant.

85   Staff research and scholarship directly informs and enhances teaching. All research proposals must demonstrate student engagement and impact, and all results are disseminated at an annual multidisciplinary research and scholarly activity day. This approach provides an effective mechanism for sharing good practice and evaluating impact and is widely appreciated by staff.

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

86   Extensive employer relationships are maintained, particularly in the Zoological, Marine, Equine, Veterinary Nursing, Sports, Business and Land-Based areas. Opportunities are regularly taken up by staff for accessing relevant employment experience and studying the implementation of current professional practice. Examples include working with the Healthy Livestock project through the Rural Business School, the Eden Project, and Community Councils. The team noted close work with employers and-up to-date professional practice at the point of programme validation in areas such as social housing and renewable energies, which demonstrated a proactive approach to emerging government policies.

87   Cluster Advisory Boards were established in 2014 to extend and formalise employer engagement although these were largely discontinued in 2016 in light of attendance difficulties. The Group has since reviewed the situation and moved towards larger subject driven symposia, such as Public Services, rather than smaller specific programme areas, such as Health and Wellbeing, which demonstrates the ability of the Group to evaluate and adapt its structures (see paragraph 21).

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

88   Staff development and appraisal opportunities enable staff to develop and enhance their professional competence and scholarship. The Group uses an appraisal process that encompasses performance management, teaching observations, mentoring, continuous professional development and, for staff engaged in higher education, plans for research and scholarly activity that align with the Group Research and Scholarly Activity Policy. The process includes an interim and end-of-year review, the setting of Universal, Specialist and Personal (USP) goals and action plans. For higher education staff, the future development plan also includes discussion of research and scholarship that staff are undertaking to inform teaching. Developmental opportunities are often tailored to specific needs, such as multi-site delivery, virtual learning development, and middle management training. Clusters hold higher education development days, which focus on such things as assessment, plagiarism and tutorials.

89   Where it is functioning, staff development and appraisal works well. However, the team had difficulty in verifying coverage of the process. The system is not centralised and documentation on recruitment, human resources, staff development and payroll is held in four different systems rather than in a single repository. Furthermore, implementation of the appraisal system is not comprehensive with only 30 per cent of staff reported to have been appraised in 2014. While the appraisal rate was reported to have risen to 75 per cent during the scrutiny, a further update on appraisal rates requested in July 2017 was not provided. A new Head of People Development was employed in 2014 specifically to remedy

shortcomings in maintaining comprehensive staff records, and when met by the team was able to provide hard copy examples of materials held. These were fit for purpose and demonstrated that staff opportunities for developing professional competence and scholarship were taken up. A new human resources management system is in the process of being developed. The Group intends to achieve 100 per cent appraisal coverage and to centralise people management, although the final update that the team received did not demonstrate that these issues had been fully resolved.

Experience of curriculum development and assessment design

90   Staff regularly engage in the design, development and approval of programmes on which they teach and are ably supported by the central HE Operations Team. The team observed several programme validation events and although some teaching staff were less assured about the detail of curriculum development and assessment design, senior managers involved in the process were always fully competent and knowledgeable. The Group also regularly provides staff development and training on curriculum development and assessment design.

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)

91   The Group recognises that the level of staff engagement with other higher education institutions and organisations is relatively low and encourages staff to develop external contacts. Some staff are active as external examiners and validation panel members, although staff met by the team reported that heavy workloads inhibit this activity. The team also note a significant disincentive to engage in such work, as no remission for this activity is permitted and the Group retains any fee for activity conducted during contracted work time.

D   The environment supporting the delivery of foundation degree programmes

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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

92   The Group approach to teaching and learning activities is strongly articulated in a detailed Learning and Teaching Strategy Review and new Learning and Teaching Plan. Aims and objectives are initially the responsibility of the programme planning teams, and are fully described in the programme specifications contained in programme handbooks. The Group monitors its learning and teaching objectives effectively in relation to its stated academic objectives and intended learning outcomes through its own robust systems, including the quality assurance framework developed with its main university partner, HE SARs, HE QIPs, student questionnaires, programme and management committees, external examiners' reports, and programme review by the awarding bodies.

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

93   Assessment procedures are outlined in a general HE Assessment Procedures document and each programme handbook states that unconfirmed marks and feedback must be given to students with 20 working days. The deadline is monitored in various ways, including module evaluations, annual monitoring, external examiners' reports and general surveys, such as the NSS and SPQ. The team noted some variability in student feedback with marking deadlines being missed and inconsistency in the return of work between some subject areas, although most indicators point to acceptable student satisfaction with marking turnaround times. Students expressed greater dissatisfaction when advertised assessment deadlines were changed, although this was largely attributable to local circumstances rather than a systemic deficiency. The issue of turnaround times has been raised in some recent external examiner reports, through the annual monitoring process and noted as an area for improvement in the Science and Natural Environment Cluster periodic review report and the Group HE QIP 2015-16. Staff confirmed that Programme Managers monitor assessment feedback deadlines and discuss late feedback with module leaders. In addition, checks on adherence to assessment feedback deadlines are regularly completed and the Group continues to take steps to address the occasional instances when feedback exceeds the 20-working day limit.

Constructive and developmental feedback is given to students on their performance

94   The Group ensures that feedback given to students on their performance is constructive and developmental by monitoring the Assessment Policy and HE Assessment Procedures through the annual monitoring processes. Student surveys, which are regularly monitored through the deliberative committees and the Board, indicate that feedback is constructive and developmental. External examiner reports, which contain specific questions on the constructiveness of assessment feedback, consistently describe feedback positively, using words such as 'excellent', 'positive', 'high level', 'sound', and 'encouraging'. Students met by the team, equally describe the quality of feedback in highly positive terms.

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

95   Student feedback is gathered in many ways, including through student review meetings, student representatives, PCMs, the Student Union, the SPQ, the NSS and student module evaluations. Student representation operates through a Student Union and representatives are used throughout the Group's committees as a mechanism for gathering and returning feedback, including at PCMs, validation events, the HEMC, the HEAB and the Board. The Group regularly evaluates student feedback and addresses any focused criticism. For instance, the repeated negative feedback from the compulsory Personal Employability and Skills Development module initiated a review and redesign of the module. Students met by the team were generally positive that their voice was heard, and the team observed meetings in which students were encouraged to present their views. Students performed their representative function well in meetings and issues raised were always seriously addressed, often with specific action points.

96   Staff feedback occurs through the appraisal and performance process, through membership of committees, development days, away days, staff forums, the annual Higher Education Conference and, more formally, through staff surveys. The outcomes of staff feedback are reported through the appraisal and performance process, staff briefings, an

in-house publication, Insight, staff forums and a higher education newsletter. Staff met by the team were generally positive that the processes operate effectively and that staff views are respected.

97   Extensive external stakeholder involvement is evident across the Group's operations through which it receives feedback. The relationships with the Local Enterprise Partnership, local Council and Members of Parliament are strong. Several members of the Board are drawn from local business, industry and commerce. The Group's emphasis on career-led learning and employability is reflected in employer engagement in all new programme planning and periodic review, work-based learning, real-life projects and employment forums.

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

98   Processes for advising and inducting students are clearly articulated and take account of different students' needs. Before enrolment, students can self-declare disabilities or specific learning support needs, can visit the campus and access the online applicant portal. The team noted innovative online practice in the pre-induction activities for the Housing programmes which enhanced the effectiveness of formal induction. Formal induction begins after enrolment, where students are assessed, timetabled for a campus induction and introduced to key staff and support services. Currently, students are also taken to visit the degree-awarding body. The process is generally effective, regularly reviewed, and with the occasional exception, students met by the team spoke positively of the experience.

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

99   Overall institutional resourcing, including all higher education student resources, is addressed on an annual basis through the curriculum review and operational planning processes, and the SET signs off the final documentation. Resources for new programmes, including staffing, are thoroughly considered throughout the validation process. Resources for current programmes are reviewed through annual monitoring and SARs. All staffing and learning resources are listed in programme handbooks. Teaching staff have direct input into resourcing through the annual updating of the Definitive Module Record, which is particularly effective for ensuring the currency and adequacy of module resourcing.

100   Overall, learning support materials are adequate to support students, although a few areas for development have been raised through the quality assurance processes. The reliance on a small number of academic staff was raised in several programme approval events observed by the team, although the Group explained that this was being addressed by cross-campus teaching, sharing of modules, the use of technology-based learning, input from guest lecturers and the more flexible use of staff across clusters. Some action plans arising from PCMs in the past two years have highlighted the need to update specialist equipment and address issues regarding access to IT resources. Students met by the team indicated that resources were largely adequate, but also indicated disparity in relation to resources across sites and some external examiner reports and periodic review reports have also raised concerns about the adequacy of specialist resources or staffing levels, including for students who had recently moved from the Camborne site to Rosewarne which students considered less well equipped for higher education study. The team did not identify any instances of failure to deliver programmes due to inadequate support materials and the Group continues to address resourcing issues through its annual planning procedures (see paragraph 2) but given the difficult economic climate in which it is operating, and the decreasing student recruitment numbers, resources are likely to be under continuing pressure.

101   The engagement network with external employers substantially contributes to resourcing student support through work-based learning and placement opportunities. Some of these external resources are of world-class quality, such as in the case of Marine Studies and the Eden Project.

102   There is good use of technology for teaching purposes that continues to develop, and the FdA Housing programme operated from the Worcester site provides an example of excellent online programme delivery. However, use of technology for cross-site teaching remains in an embryonic stage, despite being regularly mentioned as a priority for development. By the end of the scrutiny, no programmes were taught from one campus to another using technology and no programmes were delivered simultaneously on any two campuses, but staff do sometimes travel between sites to deliver programmes. In addition, the team noted inconsistent practice in the use of the virtual learning environment across the Group, ranging from no use on some programmes to quite developed teaching practice, which was verified by students and staff met by the team.

103   Full-time and part-time students met by the team indicated general satisfaction with resourcing, although recent surveys identify some concerns. NSS responses for learning resources range from an average of 74 per cent in 2013 to 70 per cent in 2017 (the latter is 15 per cent below the sector average), and from an average of 81 per cent in 2013 to 76 per cent in 2017 for the SPQ. The 2017 NSS Plymouth results for the Group indicate 49 per cent satisfaction for learning resources. The 2017 Group's NSS results are split between responses from students eligible to complete the Cornwall College NSS, 343 or 89 per cent of its total, and those eligible to complete the Plymouth NSS, 44 or 11 per cent of its total. Although the Group is seeking to avoid an overreliance on small numbers of teaching staff in subjects, and teaching staff considered levels adequate, students expressed concern about small cohorts and low staffing. Furthermore, recent staff redundancies have impacted negatively in some areas, which have been identified by the Board and are being addressed. Due to the timing of the scrutiny, the outcomes from the 2017 institution-wide student surveys have not yet been fully considered through the deliberative structure, although previous evidence of how the Group monitors and responds to issues arising from student feedback indicates that appropriate actions will be put in place to address the latest results (see paragraph 100)**.**

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

104   The effectiveness of advisory and counselling services is monitored at HEMC and HEAB for students and at the Board for staff. A revised system of student support followed the restructuring of learner services, in which the Group shifted away from in-house provision to outsourcing and an overall reduction of campus time availability. Both staff and students met by the team expressed concern over these changes. Additional support in the form of three HE Senior Tutors was put in place for 2016-17 and initial indications are that this is working well. Support for staff is also provided by Human Resources and Occupational Health.

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

105   The central Registry system ensures consistency of practice and information regarding all areas of higher education. The observation of assessment boards, panels and committee meetings demonstrates that the administrative support systems are able to monitor student progression and performance accurately and to provide timely and accurate information to satisfy academic and non-academic management information needs. In

addition, tutors use the online Student Tracking and Review System to record student reviews, reports and concerns.

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

106   The Group has effective procedures for all complaints. The procedures for addressing complaints are clearly stated and made readily accessible, for example through student handbooks, on the website and through information in student results letters. Students met by the team demonstrated good awareness of the mechanisms in place to address informal and formal complaints, although they noted that most matters are dealt with through local approaches to tutors. Following an internal review, the Group has recently revised its complaints procedures for implementation in the 2017-18 academic year to make this explicit to the needs and entitlements of higher education students. The HE QIPs reflect a downward trend in the number of formal complaints received over the period of the scrutiny.

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

107   Staff involved with supporting the delivery of higher education provision are given adequate opportunities for professional development (see paragraph 88). The staff development and performance management system covers support staff as well as academic staff and includes the setting of individual goals, developmental opportunities and action plans; however, not all staff are routinely appraised (see paragraph 89).

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

108   The Group's HE Public Information Procedure ensures that information produced on higher education provision is accurate and complete. The Cluster Curriculum Leaders and the HE Leads are responsible for ensuring the accuracy of all information submitted for publication by programme managers. The HE Operations Team has final responsibility for approving and sanctioning all information for publication after liaison with the Marketing Manager and the degree-awarding bodies. Students met by the team considered that information received was generally accurate and helpful. During the period of the scrutiny, the team noted that most information was accurate and complete with only minor inaccuracies identified, usually around late changes to programmes.

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

109   The Group seeks and achieves equality of opportunity in its activities through its Single Equality Scheme, its Equality and Diversity Policy and accompanying action plan, the work of the Equality and Diversity Coordinator, and through mandatory and regular staff training. The Group annually monitors and updates its Equality and Diversity policies and procedures through the Equality and Diversity Committee. Reports from this committee routinely feed into other committees, such as the Excellence and Experience Committee and HEAB. Staff met by the team demonstrate a good understanding of the Equality and Diversity Policy and consider that the approach operates effectively.