# Higher Education Review (Alternative Providers) of CWR t/a Waverley Abbey College

November 2017

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About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at CWR t/a Waverley Abbey College (the College). The review took place from 7 to 9 November 2017 and was conducted by a team of three reviewers, as follows:

- Professor Mark Hunt
- Dr Karen Willis
- Mr Richard Alderman.

The main purpose of the review was to investigate the higher education provision and to make judgements as to whether or not academic standards and quality meet UK expectations. These expectations are the statements in the UK Quality Code for Higher Education (the Quality Code)\(^1\) setting out what all UK higher education providers expect of themselves and of each other, and what the general public can therefore expect of them.

In Higher Education Review (Alternative Providers) the QAA review team:

- makes judgements on
  - the setting and maintenance of academic standards
  - the quality of student learning opportunities
  - the information provided about higher education provision
  - the enhancement of student learning opportunities
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

The QAA website gives more information about QAA\(^2\) and explains the method for Higher Education Review (Alternative Providers).\(^3\) For an explanation of terms see the glossary at the end of this report.

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\(^1\) The UK Quality Code for Higher Education is published at: [www.qaa.ac.uk/quality-code](http://www.qaa.ac.uk/quality-code).
\(^2\) QAA website: [www.qaa.ac.uk](http://www.qaa.ac.uk).
\(^3\) Higher Education Review (Alternative Providers): [www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education](http://www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education).
Key findings

Judgements

The QAA review team formed the following judgements about the higher education provision.

- The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies meets UK expectations.
- The quality of student learning opportunities meets UK expectations.
- The quality of the information about learning opportunities meets UK expectations.
- The enhancement of student learning opportunities meets UK expectations.

Good practice

The QAA review team identified the following features of good practice.

- The extent to which the development of students' professional practice awareness and skills is embedded in their learning, and supports their placement learning and subsequent employment (Expectations B3, B4 and B10).
- The comprehensive annual review of programmes, which engages students and enhances their learning opportunities (Expectations B8 and B5).
- The information, structures and support for all aspects of placement and practice learning, enabling all parties concerned to satisfy professional and academic responsibilities and requirements (Expectation B10).

Recommendations

The QAA review team makes the following recommendations.

By July 2018:

- ensure that policies, once approved, are monitored and reviewed routinely to ensure their currency and to enable evaluation of their effectiveness (Expectation A2.1)
- ensure that assessment feedback is timely and that assessment feedback schedules are published and consistently applied to support student academic development (Expectations B3, B4 and B6)
- formalise and implement a staff development plan to extend and develop academic staff members' wider awareness, understanding and practice of learning and teaching in higher education (Expectation B3)
- strengthen central oversight of assessment feedback timescales to ensure that the Academic Board takes responsibility at institutional level for the consistent implementation of published practice and procedure (Expectation B6).

By January 2019:

- develop a strategic approach to enhancement that establishes and articulates a clear alignment between institutional strategic objectives and enhancement activities, and monitor and evaluate the impact on the quality of the student experience (Enhancement).
Affirmation of action being taken

The QAA review team affirms the following actions already being taken to make academic standards secure and/or improve the educational provision offered to students:

- the steps being taken to improve learning resources to ensure that these are fit for purpose for current and new provision (Expectation B4)
- the work that is underway to enable students to actively contribute above programme level to the further development of the College and its provision (Expectation B5).

About the provider

Waverley Abbey College (the College) is the educational arm of CWR, an international Christian training and resourcing charity that has developed in-depth courses in counselling over the last 20 years. The College was established in 2014 with a view to continuing the work of its predecessor, Waverley Training, and to further develop the vision to integrate Christian faith into the practice of learning in a higher education environment.

Since its establishment, the College has offered undergraduate and postgraduate programmes leading to a BA (Hons) in Counselling, an MA in Counselling, and an MA in Relational Counselling and Psychotherapy awarded by Roehampton University. In October 2015, Roehampton gave notice that it would not be renewing the partnership agreement with the College. The University revalidated and reviewed the BA (Hons) Counselling programme in April 2016. The September 2016 intake of students was the last intake under the agreement with Roehampton.

In 2016-17, 141 students were enrolled on the undergraduate programme and 39 on the taught postgraduate programmes validated by Roehampton University.

The College has now entered into a new partnership agreement with Middlesex University. Following the successful validation of programmes leading to a BA (Hons) in Counselling and an MA in Therapeutic Counselling and Psychotherapy in May 2017, the College admitted its first intake into these programmes in September 2017. It is now seeking validation from Middlesex to offer an MA in Counselling.

The College underwent a QAA Review for Specific Course Designation in January 2014. The January 2014 review, which resulted in positive judgements in all judgement areas, identified four features of good practice and led to four recommendations. The monitoring visit of January 2016 confirmed that acceptable progress had been made in implementing the College’s action plan. Some actions remained incomplete, notably the production of a quality handbook; mapping of policies against the Quality Code; and the implementation of a College information and publication policy.

The delay in progress was attributed to a period of transition due to changes in the College leadership. Following the departure of the College Consultant Interim Principal in April 2015, the Chief Executive Officer and the College Executive provided internal oversight of higher education at the College. A new College Director was appointed in March 2017. Progress has since been made with the preparation and publication of further policies.
Explanation of findings

This section explains the review findings in greater detail.

1 Judgement: The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations

Expectation (A1): In order to secure threshold academic standards, degree-awarding bodies:

a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) are met by:

- positioning their qualifications at the appropriate level of the relevant framework for higher education qualifications
- ensuring that programme learning outcomes align with the relevant qualification descriptor in the relevant framework for higher education qualifications
- naming qualifications in accordance with the titling conventions specified in the frameworks for higher education qualifications
- awarding qualifications to mark the achievement of positively defined programme learning outcomes

b) consider and take account of QAA’s guidance on qualification characteristics

c) where they award UK credit, assign credit values and design programmes that align with the specifications of the relevant national credit framework

d) consider and take account of relevant Subject Benchmark Statements.

Quality Code, *Chapter A1: UK and European Reference Points for Academic Standards*

Findings

1.1 Ultimate responsibility for securing threshold academic standards resides with the College's degree-awarding bodies. The College's provision operates under validation arrangements with the University of Roehampton (final intake September 2016) and, from September 2017, Middlesex University. The College is responsible for maintaining standards through the delivery, monitoring and review of its provision. Adherence to the awarding partners’ regulations, processes and procedures, as set out in partnership agreements, would enable the College to meet the Expectation.

1.2 The review team tested the effectiveness of the application of the regulations, processes and procedures governing the partnerships by examining partnership agreements; programme handbooks; programme specifications; module descriptors; and programme review and validation documentation. The team also met senior staff, academic staff, professional support staff and representatives from the awarding bodies.
1.3 The review team found the procedures to be effective. The team heard that the ending of the partnership agreement between Roehampton and the College had not come about because of any concern about quality and standards at the College, which had complied fully with the University's requirements at all times. Students on years three, four and five of the BA (Hons) remain on the Roehampton-validated award. The Roehampton MA Relational Counselling and Psychology and MA Counselling programmes are being taught out.

1.4 The College now delivers years one and two of its part-time intake to the BA (Hons) Counselling under Middlesex University regulations, second-year students having agreed to transfer following consultation. The College also delivers an MA Therapeutic Counselling and Psychology, validated by Middlesex University. The transition between awarding bodies has been well managed and the College has shown mature understanding and use of national frameworks and institutional regulations in the process.

1.5 The review team saw evidence testifying to the alignment of programme learning outcomes with the relevant level descriptors and the appropriateness of module learning outcomes within the national credit framework. Under the validation agreement with Middlesex University, students may now register for a Certificate or Diploma in Higher Education as both target and exit awards.

1.6 The College's programmes have been mapped against, and designed to articulate with, the Counselling and Psychotherapy Subject Benchmark Statement (2013). External reports, including a QAA monitoring visit report (January 2016) and a Middlesex University validation report (April 2017), confirm that appropriate use has been made of the Subject Benchmark Statement to inform programme learning outcomes.

1.7 The College's programmes are also aligned with a range of professional body requirements, notably those of the British Association for Counselling and Psychotherapy (BACP) and the Association of Christian Counsellors. The validation report mentioned above confirmed that the standards for BACP course accreditation (Gold standard) May 2009 (revised 2012) had been used as reference points for the programmes. The BA (Hons) programme handbook and programme specification 2017-18 emphasise that all modules are compulsory, thereby ensuring that students who successfully complete the Diploma in Higher Education, and BA (Hons) Counselling graduates, are eligible to work towards full individual accreditation with a professional body.

1.8 Programme specifications are included in programme handbooks and are completed in accordance with the requirements of the awarding bodies, making reference to the FHEQ. Staff maintain familiarity with the FHEQ and other national reference points through validation preparation activity and team standardisation meetings.

1.9 The College effectively manages its operation of the regulatory frameworks of its awarding bodies. The arrangements in place for the transition between awarding bodies are sound and the College is managing well the challenges of working with two sets of regulations. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A2.1): In order to secure their academic standards, degree-awarding bodies establish transparent and comprehensive academic frameworks and regulations to govern how they award academic credit and qualifications.

Quality Code, Chapter A2: Degree-Awarding Bodies' Reference Points for Academic Standards

Findings

1.10 The academic frameworks and regulations of the validating universities govern the award of academic credit and qualifications at the College. Both sets of regulations are published on the virtual learning environment (VLE). The College also consolidates student information on regulations into programme handbooks, which are approved by its validating partners.

1.11 The College has a clearly defined organisational structure whose purpose is to oversee its internal academic governance arrangements and ensure that the College's responsibilities to its awarding bodies are discharged effectively. The deliberative and management structure includes the College Executive, Academic Board and programme boards. The College has also established a College Management Group to address operational issues as they arise. The Group provides a link to more strategic decisions taken by the College Executive, the Waverley Abbey College Advisory Group (WACAG) or the CWR trustees. The academic frameworks and regulations that apply, coupled with the College governance and organisational structure, would allow the Expectation to be met.

1.12 The effectiveness of these structures, procedures and practices was tested by looking at the terms of reference and minutes of the Academic Board, College Executive, WACAG, College Management Group and programme boards. The team also discussed the College's governance arrangements with senior staff, academic staff and professional support staff.

1.13 The review team found the arrangements to be effective in practice. The remit of the Academic Board is to monitor, review and maintain oversight of the quality of higher education provision, with more strategic, policy or resource-related matters referred to the College Executive or WACAG, and ultimately the Board of CWR trustees. Programme boards and the Academic Board provide good oversight of academic matters and reports, for example Programme Annual Reviews and Standards, Quality and Enhancement Plans. Individuals, including management, teaching and professional support members of staff, have clear roles. The College Director, the Academic Lead and the Academic Registrar all hold significant responsibilities for implementing academic governance arrangements, supported by the Registrar, programme administrators, and academic programme convenors and year leaders.

1.14 Awarding body validation and periodic review reports confirm the College's engagement and compliance with validating partner requirements and procedures. Link tutors, appointed by each awarding body, oversee the College's adherence to the relevant awarding body academic framework. The awarding bodies have permitted the College to develop its own policies on marking criteria, recognition of prior learning, academic misconduct, and appeals and complaints.

1.15 The College has mapped its polices against the Expectations of the Quality Code and minutes of the College Executive Group record discussion and approval of policies. A number of policies, for example the Staff Development Policy and a crisis intervention policy, are at draft or consultation stages and not yet implemented. Others, for example on
disability, and on research ethics, are being reviewed. Several internal policy documents, including the Teaching, Learning and Assessment Policy, indicate that they had been due for review in 2016.

1.16 Although the College has a policy writing schedule, indicating dates of approval by the College Executive, WACAG and the CWR Board, dates for reviews have not been followed in all instances. The College is aware of this and cited the priorities of changes in leadership; the revalidation of the University of Roehampton provision in 2016; and the transition to Middlesex University as the validating partner in 2017 as the reasons for some policies not having been reviewed, progressed or embedded. The review team recommends that, by July 2018, the College ensure that policies, once approved, are monitored and reviewed routinely to ensure their currency and to enable evaluation of their effectiveness.

1.17 The transition between the two awarding bodies is being handled thoroughly and conscientiously, to the complete satisfaction of both awarding bodies. In the experience of the awarding bodies, the College has demonstrated mature understanding of academic management, and both structures and practices are in place to ensure that academic standards are maintained. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A2.2): Degree-awarding bodies maintain a definitive record of each programme and qualification that they approve (and of subsequent changes to it) which constitutes the reference point for delivery and assessment of the programme, its monitoring and review, and for the provision of records of study to students and alumni.

Quality Code, Chapter A2: Degree-Awarding Bodies’ Reference Points for Academic Standards

Findings

1.18 Programme and module specifications are approved by the College’s awarding bodies at validation and periodic review events, and revisions are submitted to the relevant awarding body for approval. The College is responsible for the production of definitive records of programmes and modules, in line with awarding body policies, procedures and regulations.

1.19 The definitive record of programme specifications, including information about programme delivery and assessment, is maintained in separate programme handbooks for each programme of study. Each handbook outlines the reference points for the qualification, intended learning outcomes, curriculum mapping and module descriptors. Programme handbooks and specifications are produced in accordance with validating body requirements and are available to students on the VLE. Programme handbooks include module descriptors and outline module content, learning outcomes, teaching and assessment methods and reading lists. These procedures would allow the Expectation to be met.

1.20 The review team tested the effectiveness of the College’s procedures by considering a range of materials, including programme handbooks, module descriptors and module mapping, and by verifying their presence on the VLE. The team also met students and academic staff responsible for updating programme handbooks.

1.21 Programme handbooks have been updated and approved following the change in validating partner and shared with students to provide them with definitive information on programme and module content.

1.22 Senior staff confirmed the process for the approval of changes to programme content and structure through the awarding body, as well as an annual internal procedure for the revision of module bibliographies and the accuracy of information by academic staff. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A3.1): Degree-awarding bodies establish and consistently implement processes for the approval of taught programmes and research degrees that ensure that academic standards are set at a level which meets the UK threshold standard for the qualification and are in accordance with their own academic frameworks and regulations.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.23 The College has delegated responsibility from its awarding bodies for the design, development and revision of awards under validated partnership arrangements. Programme teams manage the design and development of programmes within the College and a team member acts as the lead on course development. The College's academic governance and management committees contribute to programme design. They also scrutinise and approve programmes ready for validation by the awarding bodies. The College works closely with awarding body link tutors, who provide academic support to ensure that University requirements are met.

1.24 Programme approval follows the frameworks and regulations of each awarding university. These detail the quality assurance procedures to be followed to meet UK threshold standards. The College and its programme teams have utilised, and engaged with, a range of external academic and professional reference points in developing its modules, programmes and qualifications.

1.25 The College consults with current external examiners when designing and revising programmes, and all awarding body validation events include external members to ensure objectivity in programme evaluation and approval. The College follows up formally on awarding body validation report outcomes and addresses validation conditions set. The frameworks and organisational structures operated by the College would allow the Expectation to be met.

1.26 The review team saw a range of programme approval documentation, including revised programme specifications and newly validated awards. The team also met senior, academic and support staff, as well as awarding body representatives and a placement provider.

1.27 The transition from one validating body to another has been well managed. The College complies with awarding body requirements, following and implementing taught degree approval processes laid down by each awarding body and thereby ensuring that academic standards are set at a level to meet UK threshold academic standards. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A3.2): Degree-awarding bodies ensure that credit and qualifications are awarded only where:

- the achievement of relevant learning outcomes (module learning outcomes in the case of credit and programme outcomes in the case of qualifications) has been demonstrated through assessment
- both UK threshold standards and their own academic standards have been satisfied.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.28 The awarding bodies have overall responsibility for awarding credit and qualifications and each awarding body sets out its expectations for assessment, including the design and achievement of learning outcomes at module and programme levels. The College is responsible for setting and marking assessments in accordance with awarding body policies, procedures and regulations.

1.29 The College operates clear assessment policies aligned to the Quality Code. Programme teams consistently implement assessment policies and external examiner reports are discussed at programme board level. Recommendations from external examiners are routinely followed up and progressed.

1.30 Handbooks for all College programmes provide clear programme specifications, module and learning outcomes. In designing programmes, the College develops module learning outcomes mapped against programme learning outcomes and aligned to the relevant QAA Subject Benchmark Statement. Programme handbooks are scrutinised and approved at validation to ensure that intended learning outcomes match assessment activity and meet the awarding universities’ regulatory frameworks.

1.31 The College is responsible for setting, marking and moderating assignments. Programme handbooks describe internal assessment and moderation processes as well as grading criteria against which student work is assessed. Each programme has a clear assessment strategy, which is outlined in module descriptors and programme specifications.

1.32 Marking processes are clearly articulated and all assessments are internally verified. Programme teams take part in marking standardisation to improve consistency across modules and to share good practice and improve marking accuracy. New tutors receive training to ensure consistent approaches to marking standards and the provision of assessment feedback to students. All major assignments such as dissertations and extended essays are second-marked internally. All assignments that are marked unsatisfactory or at a fail grade are moderated within programme teams.

1.33 College examination board meetings, chaired by a validating university representative and attended by the relevant link tutor and external examiner, comply with awarding body requirements. External examiners have access to all student work at all levels and can select their own sample to review. External examiner reports are complimentary about the quality of student work. The arrangements that are in place for securing academic standards and for achieving relevant learning outcomes would allow the Expectation to be met.

1.34 The review team considered the effectiveness of the approach to the award of credit and qualifications by examining relevant university and College policies, regulations
and procedures, programme specifications, module content, student handbooks, assessment arrangements and minutes of assessment boards. The team also met senior staff, academic staff, professional support staff, awarding body representatives and students to discuss the effectiveness of the procedures in place.

1.35 The review team found that the arrangements for securing academic standards and an outcomes-based approach are comprehensive and robust. Programme specifications and module descriptors in programme handbooks are aligned to the relevant level of the FHEQ and, at validation, the awarding body ensures that the volume of study and level are fit for purpose. Assessment has been designed to ensure that programme learning outcomes can be met.

1.36 Staff and students demonstrated a clear understanding of assessment regulations, policies and the role that assessment plays in student learning outcomes. Module and learning outcomes are communicated to students through detailed programme handbooks, at the start of each module and through the College VLE. Students know what they need to do to achieve learning outcomes and are clear about the assessment methods used by the College. However, they commented on inconsistencies in the timeliness of student assessment feedback and the importance of receiving feedback on areas for improvement before submitting further work to be assessed.

1.37 Assessment boards operate in line with awarding body requirements, provide independence and ensure that university requirements are followed and met. External examiners moderate student work, approve marking standards at the examination boards and confirm that standards are being maintained.

1.38 Awarding body credit and qualifications requirements are met through the achievement of learning outcomes, which have been demonstrated, through assessment, to meet UK threshold and awarding body academic standards. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A3.3): Degree-awarding bodies ensure that processes for the monitoring and review of programmes are implemented which explicitly address whether the UK threshold academic standards are achieved and whether the academic standards required by the individual degree-awarding body are being maintained.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.39 As the relationship with Middlesex University is fairly new, the College has yet to undertake annual monitoring of its Middlesex-validated programmes. However, it does have experience of annual monitoring of programmes validated by Roehampton University.

1.40 The University of Roehampton specifies the process to be used for annual programme monitoring and periodic review but allows some autonomy in the delivery of each programme. Academic programme health is considered through the annual monitoring process. This requires the College to submit an annual report on the operation of each programme to the University. As part of the report, the Standards, Quality and Enhancement Plan is developed for the year ahead to address issues of concern or to identify future enhancements. Strategic oversight of monitoring and review lies with the Academic Board, which is chaired by the College Director.

1.41 The College developed and produced a detailed self-evaluation report covering the period from 2010-16 for the last periodic review of the BA (Hons) Counselling undertaken by the University of Roehampton in April 2016, in line with its standard procedures. The College provided a detailed response to the University on the outcomes detailed in the periodic review report, which included four commendations, one condition and seven recommendations.

1.42 The College and awarding body policies and procedures for annual programme monitoring and review are designed to ensure that academic standards are aligned to those of the awarding body and with UK threshold standards. The policies and procedures would allow the Expectation to be met.

1.43 In order to test the approach to monitoring and review, the review team met academic staff, including representatives from the awarding institutions, and considered a range of material relating to monitoring and review events, committee minutes, action plans and the role of the College’s academic deliberative structures within monitoring and review.

1.44 The College has undertaken a thorough approach to the self-evaluation report and adopted a self-critical approach to its provision, demonstrating that threshold standards have been met in the process. Programme Annual Reports are comprehensive and robust, serving to confirm the quality and standards of each programme operated by the College. Few issues have required follow-up by the validating body, and this was attributed to the maturity of the College. College staff clearly understand and make good use of the arrangements in place. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (A3.4): In order to be transparent and publicly accountable, degree-awarding bodies use external and independent expertise at key stages of setting and maintaining academic standards to advise on whether:

- UK threshold academic standards are set, delivered and achieved
- the academic standards of the degree-awarding body are appropriately set and maintained.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.45 The College's partner degree-awarding bodies have ultimate responsibility for making use of external and independent expertise to set and maintain academic standards, including the involvement of external expertise in programme validation, revalidation and periodic review processes. They are responsible for the appointment of external subject examiners for each programme but the College proposes nominees. These processes would enable the Expectation to be met.

1.46 In order to test whether this Expectation has been met, the review team considered the awarding bodies' procedures and regulations in addition to validation and periodic review reports. The team also discussed the operation of the processes that apply with senior staff, academic staff and awarding body representatives.

1.47 The review team found the processes to be effective. There is good communication with the awarding bodies, as the College liaises regularly with the link tutors and key quality assurance contacts at each awarding body to ensure that it has a sound understanding of matters relating to programme design and assessment. External examiners, who also advise on proposed curriculum changes or amendments, consistently confirm academic standards in their reports. Recommendations for minor alterations to programmes are considered by the College's Academic Board.

1.48 All programme tutors are qualified counsellors, bringing current experience from practice in external organisations into the design and delivery of programmes. The College also has good relationships with the key professional bodies, the British Association for Counselling and Psychotherapy (BACP) and the Association of Christian Counsellors, based on the professional accredited status of individual members of staff. The College liaised directly with the BACP over a query on accreditation of prior learning as part of the most recent validation follow-up process. The College's programmes are aligned to BACP standards to enable students to be eligible to apply for individual professional accreditation. The College aspires to gain accreditation for its programmes in due course, based on the BACP application guidance and eligibility guide for accreditation of training courses. Independent supervisors of students' clinical practice are all professionally registered and bring externality to the assessment of this aspect of the provision. Senior College staff also attend appropriate external events organised by QAA, HEFCE and HESA.

1.49 The College is meeting its responsibilities in using external and independent expertise at key stages of setting and maintaining academic standards. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations: Summary of findings

1.50 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. All Expectations for this judgement area are met with a low level of risk.

1.51 There are no affirmations or features of good practice in this judgment area. The single recommendation, to be met by July 2018, relates to the need to ensure that policies, once approved, are monitored and reviewed routinely to ensure their currency and to enable evaluation of their effectiveness.

1.52 The review team concludes that the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies at the College meets UK expectations.
2 Judgement: The quality of student learning opportunities

Expectation (B1): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective processes for the design, development and approval of programmes.

Quality Code, Chapter B1: Programme Design, Development and Approval

Findings

2.1 Programme design, development and approval follow the frameworks and regulations of the two respective awarding bodies. The College must first gain 'in principle' approval from the awarding body to develop a new programme before proceeding to the development of detailed programme structure and content. The university approval stage includes external validation panel members.

2.2 In order to meet awarding body requirements, the College has adopted a three-stage approach to programme design, development and approval. The first stage involves collecting ideas from staff (both bottom up and top down). New programme concepts are also discussed informally among staff and by the College Management Group to assess ideas and explore the market potential. The Group approves new programme development and the College Executive is involved when there are resource implications.

2.3 The programme development stage is undertaken once a programme has been approved for development and a staff member is tasked with leading the development process. The programme lead is expected to draw upon external benchmarks and relevant professional body standards, as well as the expertise of other staff team members and external examiners, for programmes being revalidated. In addition, students' views are canvassed when developing or making changes to existing programmes.

2.4 The programme approval phase relies upon the approval processes of the validating body. The College develops all programme specifications and supporting course documentation to meet validating body requirements. The implementation of the awarding body policies and processes would allow the Expectation to be met.

2.5 The review team considered the minutes of relevant committees, including those of the Academic Board, the College Management Group and the College Executive. It also reviewed documentation relating to programme approval, and discussed the policies and processes that apply with a range of senior and academic staff, professional support staff and students.

2.6 College programme teams engage with relevant external reference points to ensure that awarding body requirements and relevant professional body requirements are met. The College is considering potential new programmes in cognate disciplines but plans are at an early stage of development. Future and current programmes are discussed at a range of fora, including the Academic Board and programme boards. Although not currently members of the Academic Board, students play an active part in discussions.

2.7 The College follows closely its awarding bodies' policies and procedures as they relate to programme approval and exercises oversight of the development of new provision. The awarding body link tutors actively provide support to College staff with regard to University policy and procedure, and external examiners are invited to comment on revisions to programmes.
2.8 In complying with the requirements of its awarding bodies, the College is discharging its responsibilities for operating effective processes for the design, development and approval of programmes. The review team concludes that the Expectation is met and the associated level of risk is low.

**Expectation:** Met  
**Level of risk:** Low
Expectation (B2): Recruitment, selection and admission policies and procedures adhere to the principles of fair admission. They are transparent, reliable, valid, inclusive and underpinned by appropriate organisational structures and processes. They support higher education providers in the selection of students who are able to complete their programme.

Quality Code, Chapter B2: Recruitment, Selection and Admission to Higher Education

Findings

2.9 The process for admissions is outlined in the College's admissions policy, which was approved in 2015 and is subject to review in December 2017. The policy, which also outlines the process for making an appeal against an admissions decision, is accessible to prospective students on the College’s website.

2.10 The College runs a small number of open days each year and accepts direct applications for both undergraduate and postgraduate programmes. Students apply using a College application form and may be invited to interview. Students seeking accreditation of prior learning for direct entry part-way through a programme submit their request as part of the application process. Applicants invited to interview are interviewed by a member of the programme team using a standardised template. Unsuccessful students receive feedback from admissions staff indicating why they have not been accepted and areas for development for a successful application in the future. Successful applicants receive an offer letter detailing any conditions to be fulfilled before joining a programme, such as participation in the College's study skills induction activity. The College does not accept applications from students residing outside the European Economic Area, unless applicants have a valid visa to allow residency.

2.11 The College maintains policies and procedures for the accreditation of prior learning and recognition of prior learning in accordance with the quality framework of the validating university. Recognition of prior learning being mapped against learning outcomes. Although the admissions policy includes a complaints procedure, no complaints have been made. The College Management Group regularly reviews and monitors student recruitment throughout the academic year, as well as collecting demographic data on applicants. Reports are produced for each programme. As part of the annual monitoring process for awarding bodies, recruitment trends are also reviewed. The policies and procedures adopted by the College would enable the Expectation to be met.

2.12 The review team tested the effectiveness of the College's procedures by reviewing policies and procedural documentation relating to admissions made by the College. The team also met students and academic and administrative staff responsible for admissions. Students were positive about the admissions process, including the recognition of prior learning, where applicable. They noted deliberate interventions that had been made to support their return to study, such as a study skills day and an access course to aid familiarisation with the Waverley Integrative Framework for direct entry above Year 1. Published materials and information provided at open days reflected their experience upon enrolment. The College has adopted a range of measures to review the effectiveness of the admissions processes, including following up on open day attendance, provision of access/induction courses and monitoring of conversion rates.

2.13 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B3): Higher education providers, working with their staff, students and other stakeholders, articulate and systematically review and enhance the provision of learning opportunities and teaching practices, so that every student is enabled to develop as an independent learner, study their chosen subject(s) in depth and enhance their capacity for analytical, critical and creative thinking.

Quality Code, Chapter B3: Learning and Teaching

Findings

2.14 The College delivers its provision over two sites; a programme recruits to one site only in an academic year. Parallel delivery is not offered at different sites in the same academic year and students are not required to move between sites within an academic year. All students are part-time and are taught mainly through attendance at weekend or week-long teaching blocks.

2.15 The College's VLE provides each year of each programme with a dedicated space for resources and regulatory information. Programme handbooks are comprehensive and contain information for students on learning and teaching. Student feedback on teaching is provided through surveys on each teaching block and module, at programme boards, and through the National Student Survey. The quality of learning and teaching is reviewed through annual Programme Annual Reviews, and Strategic Quality and Enhancement Plans, under the oversight of the Academic Board.

2.16 The College has a Teaching, Learning and Assessment Policy outlining its approach to learning and teaching, underpinned by its mission and core values. The Observation of Teaching and Learning Policy requires programme convenors and year leaders to formally observe and provide feedback to all tutors at least once each academic year. Structured staff appraisals, focusing on professional development, take place on a regular basis. The College is developing a Staff Development Policy, encouraging academic staff to gain a teaching qualification in higher education or to apply to the Higher Education Academy for professional teaching recognition. The College's processes would enable it to meet the Expectation.

2.17 The review team tested the effectiveness of the College's teaching and learning procedures by examining relevant policies and documentation, records of peer observation of teaching and appraisals, a summary of core teaching staff qualifications, and team standardisation meeting minutes. It also discussed the College's approach to learning and teaching with senior staff, academic staff, students, and an external counselling practice supervisor.

2.18 Students are very positive about their learning experiences and are highly satisfied with the teaching on their programmes. Effective delivery by academic staff, who are themselves counselling practitioners, is based on sound professional subject knowledge and expertise. Students are well-supported and encouraged to develop independent learning. They particularly value the effectiveness and commitment to strong relationships by staff at programme level.

2.19 The Programme Annual Reviews and Strategic Quality and Enhancement Plans consistently indicate a thorough, responsive approach at programme level to teaching and learning development and enhancement, with staff encouraging reflection, criticality and independence in students. In the preparations for the most recent periodic review of the BA (Hons) Counselling programme, students were consulted and influenced the curriculum. Programme board minutes indicate that students regularly attend and raise issues.
2.20 Programmes are designed to align to the standards of the professional body, the British Association for Counselling and Psychotherapy. There is a comprehensive set of policies relating to placements, fitness to study and fitness to practise, and an extensive fieldwork document containing all relevant requirements, guidance and templates to support the practice aspects of students’ learning. Students are familiar with these documents, which provide a thorough and informative basis for setting up and conducting students’ practice learning hours. Practice-based learning is well-integrated with the academic curriculum, with fieldwork and practical learning forming essential parts of all programmes. This is seen as a strength by students and is reflected in external positive comments about students’ self-awareness as practitioners. The extent to which the development of students’ professional practice awareness and skills is embedded in their learning, and supports their placement learning and subsequent employment, is good practice.

2.21 There is some variability in the time taken to provide feedback to students on their assessed work, which was raised as a matter for further consideration in the 2016 periodic review. A proposal for a six-week turnaround of assessment feedback was discussed at the Academic Board and reported to the BA (Hons) programme board in March 2017. The College has now agreed this, although one handbook still refers to a two-month turnaround.

2.22 The review team heard that the timescale between assignment submission and receipt of feedback does not always give students the opportunity to learn developmentally before submitting their next assignment. The College reported that the time taken to provide assessment feedback was often less than six weeks but might vary due to group size or the professional and other commitments of teaching staff, in particular, the requirement to maintain their counselling practice. Notwithstanding these circumstances and the monitoring arrangements now in place, the team found that the length of time taken to provide feedback to students potentially inhibited their learning. The review team recommends that, by July 2018, the College ensure that assessment feedback is timely and that assessment feedback schedules are published and consistently applied to support student academic development.

2.23 The review team noted that the Teaching, Learning and Assessment Policy had been due for review in July 2016 but heard that, due primarily to the demands of securing validation from a new awarding body, this had not yet been undertaken. The team found that aspects of the policy required review and updating (see also Expectation A2.1).

2.24 Staff value the observation of teaching and learning process. Records of observations are maintained and written reports are produced, under the oversight of the Academic Board. Regular team standardisation meetings involve year leaders, programme convenors, the Academic Lead, the College Director and, on occasion, professional support staff. Staff development briefing sessions have been held on QAA Higher Education Review, and mental health. All teaching staff also maintain their professional body requirement for undertaking continuing professional development in their field. The Academic Lead provides informal mentoring support and staged development for new staff, who are often former students of the College. This approach is effective but, coupled with overall academic direction, it is also highly dependent on the individual expertise and leadership of the Academic Lead.

2.25 Programme Annual Reviews include records of staff professional development undertaken each year. While they are academically well-qualified, most academic staff do not hold teaching qualifications or Higher Education Academy (HEA) Fellowship. This is recognised in the draft Staff Development Policy, which has been approved in principle by the Academic Board. The College Executive has agreed that HEA Fellowship should be a ‘desirable’ criterion for new appointments and that current tutors are to be encouraged to apply for recognition within the next three years. However, the College has not yet finalised
and implemented its staff development policy, or fully developed its approach to supporting staff to develop their learning and teaching practice and submit successful HEA Fellowship applications. The review team recommends that, by July 2018, the College formalise and implement a staff development plan to extend and develop academic staff members’ wider awareness, understanding and practice of learning and teaching in higher education.

2.26 The College has strengths in teaching and learning, with students highly valuing the professional knowledge and expertise of staff and the relationships between staff and students. The review team concludes that the Expectation is met and the associated level of risk is low.

**Expectation:** Met  
**Level of risk:** Low
Expectation (B4): Higher education providers have in place, monitor and evaluate arrangements and resources which enable students to develop their academic, personal and professional potential.

Quality Code, Chapter B4: Enabling Student Development and Achievement

Findings

2.27 The College has a range of policies to support students, including a personal tutor policy, which entitles students to three tutorials a year throughout their period of study. This entitlement is also set out in programme handbooks, which provide student support on a range of pastoral as well as academic matters. The College offers students with no previous higher education study experience a one-day study skills course before the start of term and study skills support is available throughout the first year of study. Students receive an induction at the start of their programme.

2.28 The College supports students in arranging for any reasonable adjustments assessments, where required. Subsequently, for those with specific learning support needs, a summary of adjustments is developed for each student based on their assessment. Once agreed, the student’s permission is requested to distribute the summary to the appropriate tutor team, who offer support accordingly.

2.29 Libraries containing texts, and journals are located at both sites. The College’s VLE holds programme materials such as lecture notes, PowerPoint presentations, timetables, contact details and assessment details. It is also used for the submission of assessments. In addition, the VLE hosts a ‘find a counsellor’ service to assist students in identifying appropriate placements and supervisors.

2.30 The College has adopted a range of different techniques to help students gain insight into the counselling process and experience in skills so that they are competent to practise. These are detailed in the programme handbooks. There is an embedded requirement for students to undertake appropriately supervised clinical hours in order to be eligible to apply to gain professional accreditation. The arrangements and processes relating to student support would allow the Expectation to be met.

2.31 The review team tested the effectiveness of the College’s arrangements and processes by scrutinising relevant documents relating to the policies, procedures and handbooks, and through discussion with students, teaching and support staff, and a practice supervisor.

2.32 Students are well-supported in their transition into higher education studies, which for many is after a long break from previous learning. In addition to the initial study skills day mentioned above, a three-day bridging programme prepares those transferring in from counselling programmes elsewhere. Support is provided on reflective writing skills and BA (Hons) students are clearly advised about transition to the MA programme. Students’ academic development would be further enhanced by more consistent and timely feedback on assessed work (see also Expectations B3 and B6).

2.33 Students make full use of their personal tutorial entitlement, which is monitored by programme administrators, and they are well-supported by email and telephone between taught blocks. Teaching and professional support staff are accessible and students appreciate the flexibility of the delivery model. The cohesive ethos of College creates a supportive learning environment, actively promoted by staff in all roles.

2.34 The alignment of the College’s academic provision to British Association for Counselling and Psychotherapy (BACP) standards, including supervised practice hours,
enables students to meet the essential requirements to apply for BACP individual recognition, thus promoting employability in the profession. Professional exemption is clearly an important factor for students enrolling on the BA (Hons) Counselling and some choose to study only to successful completion of the Diploma of Higher Education as, with associated practice hours, this enables them to meet BACP accreditation requirements for individual practitioners. An average of 47 per cent of students exited the programme between 2011 and 2016, having achieved their goal of professional exemption. An annual conference brings together alumni and students, and advice on setting up practice is also given in the BA (Hons) Counselling curriculum. The development of students’ professional practice awareness and skills is strongly embedded in their learning, and supports their placement learning and subsequent employment, contributing to the good practice identified elsewhere in this report (see Expectations B3 and B10).

2.35 Data on disability is reported annually and is included in programme annual reviews. The College now analyses mark profiles data to highlight any issues raised by differential outcomes from students with differing characteristics. Student and staff surveys are undertaken on the effectiveness of learning needs support. Students can be referred for assessment of needs and 20 per cent of students have a summary of required adjustments.

2.36 The College provides effective support to students in using the VLE, both individually and through a published guide. The presentation and content of information on the VLE has been enhanced in response to student feedback. Students are aware of the range of information on the VLE and commented favourably on improvements made. Strong support for learning and teaching is provided by professional support staff in response to informal requests from students. An academic skills development folder on the VLE is coordinated by programme administrators.

2.37 The most recent Middlesex University validation report confirmed suitability of teaching accommodation and equipment at both sites. The College is aware of the challenges of supporting part-time and geographically dispersed students. It is also aware that learning resources is the only area in the National Student Survey where the College scored below the sector average. Students had previously reported insufficient core texts and difficulties in accessing library resources due to limited time on weekend study blocks. The College advises students that they will be expected to obtain books of their own in their offer letter. Students registered with the University of Roehampton have access to that University’s e-books and journals but students have reported difficulty in accessing these learning resources. The College now subscribes directly to EBSCO, which has proved beneficial for all students. The team heard of further recent investment in purchasing library books and noted that plans for extending provision into new programmes would require some further investment. The review team affirms the steps being taken to improve learning resources to ensure that these are fit for purpose for current and new provision.

2.38 The College has arrangements and resources in place to enable students to develop their academic, personal and professional potential. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B5): Higher education providers take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience.

Quality Code, Chapter B5: Student Engagement

Findings

2.39 Student representatives are recruited for each cohort of each programme; they are members of programme boards and liaise between students and tutors. Meetings of programme boards are scheduled to coincide with teaching blocks and minutes record that student representatives are able to engage and raise issues at board meetings. The College has been responsive to feedback from annual monitoring reports and enhanced the support for student representatives through the delivery of training and guidance. The College does not currently have student representatives on the Academic Board or WACAG. Recognising the predominantly part-time, mature profile of the student population, the College does not wish to increase the burden on student representatives. However, it is considering the possibility of an annual event that would enable WACAG trustees to meet students.

2.40 Students are provided with feedback forms at the end of each teaching block and module. Year leaders collate this feedback annually and this is reviewed by programme leaders and the College Director. At the most recent periodic review event, students were also contacted regarding improvements that could be made to their programmes. In responding to student feedback, the College has changed marking criteria for a module and made changes to the scheduling of assessments.

2.41 The College has recently participated in the National Student Survey for the first time. It achieved scores above the sector average in all questions except for learning resources, with students reporting difficulties in accessing university and College resources.

2.42 The College has now secured access to research databases itself. The nature of the College ethos is such that its engagement with students enables issues to be resolved at a local level. Consequently, no formal student complaints have been received. The procedures adopted by the College would enable the Expectation to be met.

2.43 The review team tested the effectiveness of the College's procedures by reviewing a range of materials, including sample module evaluations and minutes of committees with student representation. The team also met senior staff, administrative staff and students from a range of programmes and levels of study.

2.44 Students are familiar with the informal and formal routes by which they could provide feedback on their programmes of study, and indicated positive adjustments that had been made as a result. Given the nature of the programme content and delivery, as well as the nature of the student population, students are confident in raising issues directly with academic or professional support staff, as appropriate. They were consulted on the practical implications of the change in validating university and noted the resulting College investment in learning resources that had benefitted the whole student body.

2.45 The College is committed to extending student representation above programme level but the precise form this will take has yet to be resolved. The review team affirms the work that is underway to enable students to actively contribute above programme level to the further development of the College and its provision.

2.46 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B6): Higher education providers operate equitable, valid and reliable processes of assessment, including for the recognition of prior learning, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought.

Quality Code, Chapter B6: Assessment of Students and the Recognition of Prior Learning

Findings

2.47 The College’s processes for assessment, including responsibilities for setting, marking and moderation, operate in accordance with the academic frameworks and regulations of its awarding bodies.

2.48 The College Teaching, Learning and Assessment Policy provides academic staff with guidance on assessment objectives, programme marking and assessment. The awarding bodies monitor the College’s assessment practices through link tutor attendance at all examination boards, the scrutiny of external examiner reports, the review of annual monitoring reports and periodic review activities.

2.49 The College designs assessments and assesses students against the validating universities’ regulations to ensure that module and programme learning outcomes are met. Programme handbooks detail the range of assessment methods used. All major assignments such as dissertations and extended essays are second-marked internally. All assignments that are marked unsatisfactory or at a fail grade are moderated within programme teams.

2.50 Assessment boards operate at College level and are chaired by a university representative. Student work is available on the VLE for external examiners to access in advance of assessment board meetings. BA and MA external examiner reports confirm that assessment standards are appropriate.

2.51 External examiner comments relating to anonymous marking and a discrepancy in marking between years one and two have been considered and action taken to address issues raised, as appropriate. The nature and scale of the College provision and student body are such that anonymous marking is difficult to achieve, and the reasons for this are understood by the validating bodies. The discrepancy identified has been addressed through staff development, the sharing of good practice between tutors, and through further consultation with the external examiner.

2.52 The College monitors student attainment and progression through programme monitoring, the details of which are included in HEFCE and HESA returns. Programme annual reviews also consider outcomes from progression and retention data, including student attainment for each programme. Progression and completion rates for the BA (Hons) are variable, which is attributed to students enrolling on the programme intending to complete year one to enable them to gain sufficient experience to apply to the MA Counselling programme, and students who choose to exit with a Diploma of Higher Education, which is sufficient to gain professional accreditation. The 2016 QAA annual monitoring review commented that progression was good once these factors were taken into consideration. Following validation by Middlesex University, the Certificate and Diploma of Higher Education are now classified as entry awards rather than exit awards.

2.53 The majority of students rated their preparation by the College to progress to the next level of study as positive and considered that assignments were representative of their
learning experience, that assignment marking criteria were clear, and that marking and feedback on assignments has been fair. Over 90 per cent felt that Waverley College had met their expectations.

2.54 Although the College receives a limited number of recognition of prior learning requests each year, it has developed its own recognition of prior learning policy, which has been approved by Middlesex University as supplementary to its own regulations.

2.55 The College process for mitigating circumstances is aligned to the requirements of the awarding body and described in programme handbooks, which also detail the process for addressing cases of plagiarism. All suspected cases of plagiarism are processed in line with the College Academic Misconduct/Infringement of Assessment Regulations Policy and are governed by the universities' regulations. Students are informed about plagiarism during induction.

2.56 Working under the regulations of the awarding body, the College operates valid and reliable processes of assessment, including those for recognition of prior learning. The range of College and awarding body policies and procedures would allow the expectation to be met.

2.57 The review team tested the effectiveness of assessment by reviewing awarding body regulations; programme handbooks; examination board minutes; the Teaching, Learning and Assessment Policy; and external examiner reports. It held meetings with senior staff, teaching staff, awarding body representatives, professional support staff, a placement provider, and students. It also viewed the College's VLE content.

2.58 The review team found that the procedures are effective and are in line with the Quality Code. The College's own policies and procedures, aligned to the respective awarding body regulations, ensure that effective assessment methods are in place to allow students to demonstrate programme learning outcomes. The College operates a consistent process for internal moderation and second-marking, which ensures the quality of marking within individual modules. External examiners confirm that the assessment processes are valid and reliable. Programme examination boards include senior College staff, academic staff, the relevant university link tutor, and the external examiner.

2.59 The awarding body regulatory framework, College policies and programme handbooks are available to staff and students on the College VLE. Students are aware of these policies and understand, for example the process for plagiarism. Student access to the VLE has improved during the previous academic year as a result of changes introduced. Programme handbooks provide detailed assessment criteria and students are familiar with the range of assessment strategies and methods. Students understand the assessment tasks set and what is expected of them, and processes are in place to support students with additional learning needs.

2.60 Programme handbooks indicated a timeframe of between six and eight weeks for the return of assessment feedback to students. Academic staff confirmed that six weeks was generally the turnaround time for feedback, however, some tutors provide feedback in three to four weeks. Students commented on the variability in feedback times and the fact that feedback was sometimes received too late to learn from it given submission dates for subsequent assignments. This variability in clear assessment feedback deadlines and schedules does not give all students sufficient time to prepare for their next assignment. Academic Board minutes indicate that the issue of assessment feedback was regularly considered, but remained an open action from one meeting to the next, without final conclusion. The review team believes that central oversight of assessment timescales by the College's Academic Board would strengthen assessment feedback arrangements and ensure that agreed timeframes are consistently implemented for all programmes.
2.61 The review team considers that the current approach adopted within the College is insufficiently robust and is a weakness in the operation of the College’s assessment feedback arrangements. The review team recommends that the College strengthen central oversight of assessment feedback timescales to ensure that the Academic Board takes responsibility at institutional level for the consistent implementation of published practice and procedure.

2.62 The College takes account of the varying academic abilities of students and those new to academic study; students appreciate the support available to enable them to achieve the learning outcomes of modules (see also Expectations B3 and B4). The awarding body regulations, College policies and programme handbooks ensure that students are aware of the assessment processes and methods used in all modules. The review team concludes that the Expectation is met. The variability in the timeliness of assessment feedback to students, and the equity and impact on student learning considerations this variability raises, calls for greater central oversight by the Academic Board to ensure consistent implementation of agreed and published assessment feedback deadlines. The level of associated risk is moderate.

Expectation: Met
Level of risk: Moderate
Expectation (B7): Higher education providers make scrupulous use of external examiners.

Quality Code, Chapter B7: External Examining

Findings

2.63 External examiners are appointed by, and report to, the awarding universities, which define the role of the external examiner. The College works with its validating universities, and their requirements for the appointment and operation of external examiners, and may propose nominees to these positions. The College’s Academic Board and the College Management Group consider and review external examiner reports and programme team responses to them. The College’s procedures and its adherence to the requirements of its awarding bodies would allow it to meet the Expectation.

2.64 The review team examined the effectiveness of these arrangements by examining relevant documentation, including external examiner reports and associated responses, and minutes of meetings where reports are considered. The team also considered information on the VLE and met students, teaching staff, senior staff and awarding body representatives.

2.65 External examiners are given access to all student work through the VLE. External examiner reports confirm standards and are complimentary about the quality of provision. Programme annual reviews and Standards, Quality and Enhancement Plans reflect comments made in external examiner reports, note programme teams’ responses and plans, as appropriate, and are submitted to the awarding body. The 2010-16 BA (Hons) Counselling self-evaluation report also includes an overview of changes and minor modifications in response to external examiners’ comments.

2.66 The review team found that the College has a good understanding of external examining procedures and implements them fully in practice. The College is responsive to external examiners’ comments, which are noted in programme annual review reports. The fieldwork policy has also been updated in response to external examiner comments. The College has responded to an external examiner’s request to see a larger sample of supervision and practice records by changing the way in which these records are processed, and the external examiner now has access to these records. Students are aware that external examiner reports are available through the VLE.

2.67 The College understands and works within established procedures for external examiners and College staff have attended external examiner induction days at the University of Roehampton. The College is in the process of nominating two new external examiners, for undergraduate and postgraduate provision, to be approved by Middlesex University. These appointments are distinct from those for the University of Roehampton programmes, which are being taught out. External examiners will examine separate assessments and attend the respective assessment boards for each awarding body. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B8): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective, regular and systematic processes for monitoring and for review of programmes.

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

2.68 The College's programmes are subject to the annual monitoring and periodic review processes of the awarding bodies. Revalidation of programmes takes place every six years. The University of Roehampton conducted a periodic review of the BA (Hons) Counselling in 2016 when the programme was successfully revalidated.

2.69 University link tutors make regular visits to the College and provide professional advice and support to programme teaching teams. The College changed awarding bodies in 2016-17. The change process has been effective and has led to a smooth transition from the University of Roehampton to Middlesex University. A teach out agreement with the University of Roehampton is currently in place and being implemented.

2.70 The College prepares Programme Annual Reports using a University of Roehampton template for each programme. The reports include a detailed and robust Standards, Quality and Enhancement Plan, which includes evidence and feedback from students and the programme external examiner. In addition, evidence is drawn from student module feedback, deliberative structure and examination board minutes, and placement and supervisor reports. The Programme Annual Reports are monitored and approved by the College Management Group, the College Executive and the Academic Board before submission to the University.

2.71 The Standards, Quality and Enhancement Plan, once developed, is implemented the following academic year and monitored by the Academic Board and programme boards. In addition, the College Management Group and College Executive provide oversight, as required. The College Director chairs the Academic Board. The College indicated that a possible future enhancement would be to include the WACAG in the annual reporting cycle to confirm that the action plan had been completed for each programme. This decision had not been confirmed at the time of the review.

2.72 Programme board meetings, which include student representation, the programme leader, academic staff, the programme administrator and relevant academic support staff, ensure that actions arising from annual programme monitoring, including external examiner reports are taken, as appropriate.

2.73 Academic module leaders provide feedback on every module and these reports are collated and contribute to Programme Annual Reports. In addition, students complete a module feedback form about their experience and on improvements that could be made. Reports are considered at programme board meetings and are summarised for inclusion in Programme Annual Reports. The feedback process is effective in supporting the students' learning experience.

2.74 This area was considered to represent good practice in the 2014 QAA Review for Specific Course Designation. The College considers that this area has been maintained and enhanced due to new data being included, for example: the Destination of Leavers from Higher Education Survey, and the analysis and performance of students from Black and Minority Ethnic backgrounds.
2.75 The College clearly and robustly follows the University of Roehampton’s processes for programme monitoring and review, and operates a mature and effective series of processes that would allow the Expectation to be met.

2.76 The review team tested the effectiveness of the College’s processes for programme monitoring and review by scrutinising policy documents, annual programme monitoring reports, validation documents, Academic Board minutes, programme board minutes and module reports. It also met senior staff, academic staff, professional support staff and university link tutors.

2.77 The review team found that the processes for programme approval, monitoring and review are maturing and are effectively managed at College level. Periodic review and programme validation arrangements remain the responsibility of the universities, and the College meets university requirements by providing annual monitoring reports for each programme. In compiling these reports, the College draws upon a range of quantitative data to support qualitative judgements. Programme teams have developed clear action plans, which are regularly monitored and reviewed. College staff and students contribute effectively to the process and are actively engaged in improving the quality of the student learning experience. The Academic Board exercises oversight of all College programmes and has responsibility for considering Programme Annual Reports, as well as identifying enhancement opportunities. The annual monitoring and review cycles are followed as outlined in the partnership agreements with the universities.

2.78 Students are able to make their views known through actively contributing to the annual programme monitoring review process, completion of module feedback forms and the National Student Survey, and through formal representation on programme boards.

2.79 The College is effectively managing its responsibilities for monitoring and reviewing programmes. The comprehensive annual review of programmes, which engages students and enhances their learning opportunities, is good practice.

2.80 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B9): Higher education providers have procedures for handling academic appeals and student complaints about the quality of learning opportunities; these procedures are fair, accessible and timely, and enable enhancement.

Quality Code, Chapter B9: Academic Appeals and Student Complaints

Findings

2.81 The College's student complaints and appeals policy outlines the process for academic and non-academic appeals, as well as the right to appeal. Other policies, such as the College's admissions policy, outline the recourse to appeal in those areas. The student complaints and appeals policy is available in programme handbooks, as well as the College's VLE. Flowcharts detailing the procedure for academic and non-academic complaints are also available on the VLE.

2.82 The College has received no formal complaints. Small course sizes, the nature of the programmes offered and student body mean that issues are typically resolved informally. The College engages constructively with feedback received, reporting upwards to relevant programme boards to seek further student views on issues raised. While no appeals have been lodged to date, College staff have attended webinars provided by the Office of the Independent Adjudicator, reflecting the College's recognition that understanding among academic and professional support staff on student complaints and appeals is an area for development. These mechanisms would allow the Expectation to be met.

2.83 The review team tested the effectiveness of the College's procedures by confirming the location of relevant documentation on the VLE, reviewing informal student feedback that had been received, and through verifying understanding of procedure among students and professional support staff. The team found that issues have been resolved informally without recourse to a formal process, and professional support staff are able to refer students to guidance detailed in the student handbooks.

2.84 The policies and procedures in place are appropriate and the culture of addressing student complaints by informal resolution reflects the low incidence of appeals and complaints. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
Expectation (B10): Degree-awarding bodies take ultimate responsibility for academic standards and the quality of learning opportunities, irrespective of where these are delivered or who provides them. Arrangements for delivering learning opportunities with organisations other than the degree-awarding body are implemented securely and managed effectively.

Quality Code, Chapter B10: Managing Higher Education Provision with Others

Findings

2.85 The College made no comment on its arrangements for delivering aspects of its learning provision with others in its self-evaluation document. However, the self-evaluation document and supporting documentation presented considerable evidence and comment relevant to the Expectation.

2.86 Programme handbooks make it clear that students are responsible for arranging their own placements and clinical practice hours, both in order to enable them to be eligible to meet professional body requirements and for academic credit. ‘Find a counsellor’, a register of qualified practising counsellors on the VLE, assists students in identifying suitable placement settings. There is a comprehensive set of policies relating to placements, fitness to study and fitness to practise, and an extensive fieldwork document containing all relevant requirements, guidance, and templates to support the practice aspects of students’ learning (see Expectation B3). These arrangements would enable the Expectation to be met.

2.87 The review team examined the effectiveness of the College's arrangements for students to engage in practice learning by considering a range of documents, including policies, handbooks, guidance and agreement templates. The team also met senior staff, teaching and professional support staff, students and a practice supervisor.

2.88 The review team found that the College has established a well-documented and supportive infrastructure, which enables students to meet their practice requirements and ensures the robustness of the arrangements they make with placement providers and supervisors. A three-way contract between the College, student and placement provider helps to ensure that suitable procedures and communication are in place to protect students and clients. The BA (Hons) Counselling fieldwork document contains a template and guidance for placements, and a student and training programme agreement, including information in an introductory letter to the placement manager. Similar guidance documentation is provided for the approval of practice supervisors. All documentation is thorough and clear.

2.89 Oversight of implementation of these arrangements sits with fieldwork coordinators in each programme teaching team, who are responsible for approving and monitoring practice learning. Both placements and supervisors must be approved before students may commence their clinical practice activity. Academic Board minutes record the decision that students’ personal counsellors must belong to a professional body in order to safeguard students’ welfare. The Middlesex BA (Hons) Counselling validation record notes that Disclosure and Barring Service checks are required before students can begin placements. Programme administrators play a central role in maintaining records of placements and hours of practice completed.

2.90 Practice skills and learning are embedded in academic modules and the supervisor must report on, and approve, practice competence for a student to be able to pass this aspect of their programme. To prevent any potential disparities in awarding marks, and to ensure fairness between supervisors’ assessments of students, teaching staff have introduced a pass/fail outcome to this activity. This enables the College to maintain
consistency of standards in this area of students' work. Students also participate routinely in group supervision at the College.

2.91 The information, structures and support for all aspects of placement and practice learning, enabling all parties concerned to satisfy professional and academic responsibilities and requirements, is good practice.

2.92 The College's procedures and arrangements with other parties to support the use of the workplace as a site of students' learning are robust. The review team concludes that the Expectation is met and the associated level of risk is low.

  Expectation:  Met
  Level of risk:  Low
Expectation (B11): Research degrees are awarded in a research environment that provides secure academic standards for doing research and learning about research approaches, methods, procedures and protocols. This environment offers students quality of opportunities and the support they need to achieve successful academic, personal and professional outcomes from their research degrees.

Quality Code, *Chapter B11: Research Degrees*

Findings

2.93 The College does not offer research degrees, therefore this Expectation does not apply.

**Expectation:** Not applicable  
**Level of risk:** Not applicable
**The quality of student learning opportunities:**

**Summary of findings**

2.94 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. All Expectations for this judgement area, except for Expectation B6, are met with a low level of risk.

2.95 There are two affirmations in this judgement area. The first reflects the College’s continuing commitment to develop learning resources to ensure these are fit for purpose for current and new provision (Expectation B4). The second relates to the means by which students are enabled to actively contribute, above programme level, to the further development of the College and its provision (Expectation B5).

2.96 Three features of good practice are identified in this judgement area. The first relates to the extent to which the development of professional practice awareness and skills in students is embedded in their learning, and supports their placement learning and subsequent employment (Expectations B3, B4 and B10). The second relates to the comprehensive annual review of programmes, which engages students and enhances their learning opportunities (Expectations B5 and B8). The third relates to the information, structures and support for all aspects of fieldwork and practice learning, enabling all parties concerned to satisfy professional and academic responsibilities and requirements (Expectation B10).

2.97 Two recommendations, to be addressed by July 2018, are made relating to assessment feedback. The first recommendation, identified under Expectation B3, reflects the review team’s finding that the timeliness of assessment feedback is variable and the length of time taken to provide students may potentially inhibit their learning and development. The team therefore recommends that the College ensure that assessment feedback is timely and that assessment feedback schedules are published and consistently applied to support student academic achievement. The second recommendation relating to assessment feedback, identified under Expectation B6, relates to the need to strengthen central oversight of assessment feedback timescales by the Academic Board to ensure consistent implementation and adherence to published practice and procedure.

2.98 A final recommendation in this judgment area, identified under Expectation B3, relates to the need to formalise a staff development plan to extend and develop academic staff members’ wider awareness, understanding and practice of learning and teaching in higher education. This recommendation is to be addressed by July 2018.

2.99 The review team concludes that the quality of student learning opportunities at the College meets UK expectations.
3 Judgement: The quality of the information about learning opportunities

Expectation (C): UK higher education providers produce information for their intended audiences about the higher education they offer that is fit for purpose, accessible and trustworthy.

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1 The College uses its website and programme handbooks as the main means to provide information on programmes, supplemented by advertising in publications owned by CWR. The College has an established process for the production of marketing materials and a publications and publicity policy, approved by the College Executive.

3.2 The College Secretary is responsible for maintaining the College website, which provides information for prospective applicants and gives details on the admission process, including publication of the admissions policy to external audiences. The website provides a link to the VLE, which is subject to an annual update process to ensure information is valid.

3.3 The College does not produce a formal prospectus but course leaflets, as well as advertisements for social media and publicity purposes, are produced for in-house CWR publications, subject to an approval procedure and sign off by the awarding body where the validating partner's logo is used.

3.4 Information on programme and module specifications is contained in programme handbooks, which are updated by programme leaders and administrative staff and approved each year as part of the validation arrangement with the awarding universities.

3.5 The College is aware of new baseline standards relating to Competition and Markets Authority compliance for higher education providers, which have been considered by the College Executive. These mechanisms would allow the Expectation to be met.

3.6 The review team tested the effectiveness of the College's procedures by reviewing a range of material produced for external publication to promote the College, as well as documentation to inform staff and students of academic regulations and procedures.

3.7 Senior staff confirmed the dual process of internal review by the CWR marketing team and external validating body review, with final sign off by the College Director.

3.8 There is currently limited use of validating university logos on the College website, which is attributed to changes to the CWR website and associated work to be undertaken on the College website, coupled with the transition to the new validating body. The College has taken a deliberate decision to seek to reduce the number of approvals required by its new partner, pending changes to the College website. Student handbooks continue to display the appropriate validating university.

3.9 The College maintains a robust policy and procedure for internal and external verification and signing off published information. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
The quality of the information about learning opportunities: Summary of findings

3.10 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is met with a low level of risk.

3.11 There are no features of good practice, affirmations or recommendations relating to this judgement area.

3.12 The review team concludes that the quality of the information about learning opportunities at the College meets UK expectations.
4    Judgement: The enhancement of student learning opportunities

Expectation (Enhancement): Deliberate steps are being taken at provider level to improve the quality of students' learning opportunities.

Findings

4.1 The College has developed a range of enhancement activities relating to a commitment to improving the quality of student learning opportunities within its focus on incorporating Christian faith into the practice of learning in a higher education environment.

4.2 Given its small size, enhancements at undergraduate programme level tend to have a wider impact on the College. Enhancements are normally initiated and led by the College management. They are also identified through staff interaction with external bodies, including HEFCE, QAA, HESA and the Office of the Independent Adjudicator. A College Management Group has been established to address operational issues. Internal briefing and training on the Quality Code and the Higher Education Review process has been provided for all staff.

4.3 The College's approach to enhancing the student learning experience is evident in a number of individual areas, including module feedback gathered from students and collated into module leaders' reports, which are considered by programme boards. Annual Standards, Quality and Enhancement Plans identify enhancements at module, programme and institutional level. In addition, staff interaction with external bodies and discussion of College-level enhancements takes place in a range of forums, including 'Team Tuesdays'. These activities, underpinned by the College statement of vision, mission and values, would allow the Expectation to be met.

4.4 The review team considered the effectiveness of the College's approach to taking deliberate steps to enhancing the student learning experience by reading annual monitoring reports, programme validation, and review reports and committee minutes. The team also asked staff and students how the various enhancement activities noted by the College were strategically organised, planned and monitored systematically.

4.5 The College has enhanced the training (including a formal induction process) of student representatives on all programmes. Positive feedback on the success of this training has been noted through the Academic Board. The College has established productive and effective working relationships with its awarding bodies, aligned its activities to the Quality Code, and enhanced its approach to learning, teaching and assessment.

4.6 The College does not have a formal enhancement strategy, although it does have a good practice policy. The review team considered that the College should plan and systematically integrate enhancement activities at a strategic level. It found that a number of independent initiatives are enhancing student learning opportunities, for example through updating the fieldwork policy for students on the BA (Hons) and MA Counselling programmes, and the development of VLE as a platform to mark student work on all programmes, together with tutor training. However, central oversight and management of College-wide enhancement at a strategic level is limited.

4.7 Requests for staff development are considered on a 'case by case' basis. The College has drafted an emergent staff development policy, which has been developed to ensure that staff are appropriately qualified to teach at higher education level. The policy is brief, not particularly strategic and lacks a formally timed action plan. The staff development policy would benefit from further development and consideration.
by the College, in particular, by bringing together teaching and professional subject-based requirements.

4.8 At the time of the review the College did not have any key performance indicators or measures of success to determine improvements other than a draft initial template for a balanced scorecard, which was at an early stage of development and has yet to be considered and approved by the College. Although the College has an effective committee structure, the committee remits do not all include consideration of enhancement activities as a standing item, although programme boards do report upon various initiatives. At College level, enhancements are discussed in a range of forums, including the main board of CWR. These include, for example, the approval of policies relevant to the College and the associated staff training to disseminate the relevant information.

4.9 Although the College does not currently have a strategic approach to enhancement, the College does enhance the quality of the students’ learning opportunities and actively listens to the student body, particularly at programme level. Employers, placement providers and supervisors contribute positively to the quality of the students’ learning experience and the team noted positive external comments about the support provided for placement supervisors and the quality of the College students.

4.10 Programme annual reports consider enhancement activities and could usefully inform the College’s overall approach to enhancement. The review team recommends that the College develop a strategic approach to enhancement that establishes and articulates a clear alignment between institutional strategic objectives and enhancement activities, and monitor and evaluate the impact on the quality of the student experience.

4.11 The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low
The enhancement of student learning opportunities: Summary of findings

4.12 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is met and the level of risk is low.

4.13 There are no features of good practice or affirmations. However, there is one recommendation.

4.14 The College is recommended to develop a strategic approach to enhancement that establishes and articulates a clear alignment between institutional strategic objectives and enhancement activities, and monitor and evaluate the impact on the quality of the student experience. This recommendation is to be addressed by January 2019.

4.15 The review team concludes that the enhancement of student learning opportunities at the College meets UK expectations.
Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 21-24 of the Higher Education Review (Alternative Providers) handbook.

If you require formal definitions of other terms please refer to the section on assuring standards and quality: www.qaa.ac.uk/assuring-standards-and-quality.

User-friendly explanations of a wide range of terms can be found in the longer Glossary on the QAA website: www.qaa.ac.uk/Pages/GlossaryEN.aspx.

**Academic standards**
The standards set by degree-awarding bodies for their courses (programmes and modules) and expected for their awards. See also threshold academic standard.

**Award**
A qualification, or academic credit, conferred in formal recognition that a student has achieved the intended learning outcomes and passed the assessments required to meet the academic standards set for a programme or unit of study.

**Awarding organisation**
An organisation authorised to award a particular qualification; an organisation recognised by Ofqual to award Ofqual-regulated qualifications.

**Blended learning**
Learning delivered by a number of different methods, usually including face-to-face and e-learning (see technology enhanced or enabled learning).

**Credit(s)**
A means of quantifying and recognising learning, used by most institutions that provide higher education programmes of study, expressed as numbers of credits at a specific level.

**Degree-awarding body**
A UK higher education provider (typically a university) with the power to award degrees, conferred by Royal Charter, or under Section 76 of the Further and Higher Education Act 1992, or under Section 48 of the Further and Higher Education (Scotland) Act 1992, or by Papal Bull, or, since 1999, granted by the Privy Council on advice from QAA (in response to applications for taught degree awarding powers, research degree awarding powers or university title).

**Distance learning**
A course of study that does not involve face-to-face contact between students and tutors but instead uses technology such as the internet, intranets, broadcast media, CD-ROM and video, or traditional methods of correspondence - learning 'at a distance'. See also blended learning.

**Dual award or double award**
The granting of separate awards (and certificates) for the same programme by two degree-awarding bodies who have jointly delivered the programme of study leading to them. See also multiple award.

**e-learning**
See technology enhanced or enabled learning.
Enhancement
The process by which higher education providers systematically improve the quality of provision and the ways in which students’ learning is supported. It is used as a technical term in our review processes.

Expectations
Statements in the Quality Code that set out what all UK higher education providers expect of themselves and each other, and what the general public can therefore expect of them.

Flexible and distributed learning
A programme or module that does not require the student to attend classes or events at particular times and locations. See also distance learning.

Framework
A published formal structure. See also framework for higher education qualifications.

Framework for higher education qualifications
A published formal structure that identifies a hierarchy of national qualification levels and describes the general achievement expected of holders of the main qualification types at each level, thus assisting higher education providers in maintaining academic standards. QAA publishes the following frameworks: The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ) and The Framework for Qualifications of Higher Education Institutions in Scotland (FQHEIS).

Good practice
A process or way of working that, in the view of a QAA review team, makes a particularly positive contribution to a higher education provider’s management of academic standards and the quality of its educational provision. It is used as a technical term in QAA’s audit and review processes.

Learning opportunities
The provision made for students’ learning, including planned study, teaching, assessment, academic and personal support, and resources (such as libraries and information systems, laboratories or studios).

Learning outcomes
What a learner is expected to know, understand and/or be able to demonstrate after completing a process of learning.

Multiple awards
An arrangement where three or more degree-awarding bodies together provide a single jointly delivered programme (or programmes) leading to a separate award (and separate certification) of each awarding body. The arrangement is the same as for dual/double awards, but with three or more awarding bodies being involved.

Operational definition
A formal definition of a term, establishing exactly what QAA means when using it in reviews and reports.

Programme (of study)
An approved course of study that provides a coherent learning experience and normally leads to a qualification.
Programme specifications
Published statements about the intended learning outcomes of programmes of study, containing information about teaching and learning methods, support and assessment methods, and how individual units relate to levels of achievement.

Quality Code
Short term for the UK Quality Code for Higher Education, which is the UK-wide set of reference points for higher education providers (agreed through consultation with the higher education community, and published by QAA), which states the Expectations that all providers are required to meet.

Reference points
Statements and other publications that establish criteria against which performance can be measured.

Self-evaluation document
A report submitted by a higher education provider, assessing its own performance, to be used as evidence in a QAA review.

Subject Benchmark Statement
A published statement that sets out what knowledge, understanding, abilities and skills are expected of those graduating in each of the main subject areas (mostly applying to bachelor's degrees), and explains what gives that particular discipline its coherence and identity.

Technology enhanced or enabled learning (or e-learning)
Learning that is delivered or supported through the use of technology.

Threshold academic standard
The minimum acceptable level of achievement that a student has to demonstrate to be eligible for an academic award. Threshold academic standards are set out in the national frameworks and Subject Benchmark Statements.

Virtual learning environment (VLE)
An intranet or password-only interactive website (also referred to as a platform or user interface) giving access to learning opportunities electronically. These might include such resources as course handbooks, information and reading lists; blogs, message boards and forums; recorded lectures; and/or facilities for online seminars (webinars).

Widening participation
Increasing the involvement in higher education of people from a wider range of backgrounds.