



This review method  
is ESG-compliant

# Educational Oversight Review

## Thematic Report

Key findings from 2020-2024

July 2025

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## About this report

1 This report provides an analysis of outcomes from providers reviewed by QAA for the purposes of Educational Oversight to secure a Tier 4 sponsor license, who were not eligible to register with the Office for Students (OfS), between 2020 and 2024. The report covers the four separate review methods used:

- Higher Education Review (Alternative Providers)
- Higher Education Review (Foreign Providers)
- Recognition Scheme for Educational Oversight
- Educational Oversight: Exceptional Arrangements

2 Providers are reviewed on a four-year cycle and include providers based in England, Scotland, Wales and Northern Ireland. All providers were subject to external quality review to confirm that they meet UK expectations for academic standards and quality, as found in the UK Quality Code (2018).

3 The review of quality assurance arrangements was carried out by peer reviewers (including student reviewers) and are guided by a set of UK Expectations and associated Core and Common practices on the maintenance of academic standards and the quality of the student learning experience.

4 This report provides a summary of the findings and an analysis of the good practice and recommendations by thematic area. For the purposes of this report the outcomes from the four review methods will be analysed together with any significant differences between review methods identified.

5 In July 2024 a new review method was introduced for all providers. Educational Oversight Review (EOR) is the new method used for reviewing and monitoring private providers of higher education courses in the UK that do not receive direct annual public funding from any UK higher education funding or regulatory body. For the purposes of this report the outcomes of EOR in 2024-25 have not been considered. They will subject to a thematic analysis following the completion of the review cycle in 2028-29.

## **Educational oversight: approaches to review**

6 Higher Education Review (Alternative Providers) was QAA's review method for providers who require educational oversight and who are not eligible to register with the OfS. The overall aim was to inform students and the wider public as to whether a provider maintains the academic standards of the qualifications it offers on behalf of its degree-awarding bodies and/or other awarding organisations; and delivers learning opportunities which allow students to achieve the relevant awards and qualifications.

7 There are several related methods derived from the HER (AP) method that had similar processes and outcomes. The related review methods were:

8 Educational Oversight: Exceptional Arrangements (EOEA): which applied to colleges operating as autonomous providers with close links to a single higher education institution (normally a university). The method aimed to safeguard academic standards and contribute to the improvement of the quality of higher education; and ensure providers offer learning opportunities that allow students to achieve the relevant awards and qualifications.

9 Higher Education Review (Foreign Providers) (HER FP) was like the HER AP method but covered overseas providers offering full courses in the UK leading to non-UK awards. The overall aim was to inform students and the wider public as to whether a provider sets and maintains the academic standards of the qualifications it offers on behalf of its non-UK awarding bodies; and provides learning opportunities which allow students to achieve the relevant awards and qualifications

10 Review Scheme for Educational Oversight (RSEO) was applied to third-party providers of short-term study-abroad programmes in the UK, which formed part of degree courses offered by providers based in the United States of America. The method aims was to safeguard academic standards and contribute to the improvement of the quality of higher education offered in the UK.

## Summary of review outcomes

**Table 1: Total number of reviews and outcomes (2020-2024)**

Provider	Year of review	Review outcome: <b>Confidence</b> (RSEO & EOEA)	Review outcome: <b>Meets UK expectations</b> (HER AP/FP)
Accent International Consortium for Academic Programs Abroad	2020-21	√	
Aga Khan University (International) in the United Kingdom Institute for the Study of Muslim Civilisations	202-21		√
Al Maktoum College of Higher Education	2021-22		√
American Institute for Foreign Study (UK) Ltd	2022-23	√	
Anglo American Educational Services Ltd	2020-21	√	
Bader College (formerly Bader International Study Centre)	2020-21	√	
Bangor University International College	2022-23	√	
Belfast Bible College	2021-22		√
CEA CAPA Education Abroad	2020-21	√	
CIEE Study Abroad London Ltd	2020-21	√	
CIEE Study Abroad London Ltd	2023-24	√	
Edinburgh Napier University International College	2023-24	√	
EUSA LLP	2020-21	√	
EUSA LLP	2023-24	√	
Foundation for International Education	2020-21	√	
Free Church of Scotland t/a Edinburgh Theological Seminary	2021-22		√
GIHE UK Limited	2022-23		√
IES Abroad London	2020-21	√	
International College Dundee	2023-24	√	
INTO Queen's University Belfast	2022-23	√	
INTO Stirling LLP	2022-23	√	
Kaplan Financial Ltd	2020-21		√
Middlebury College-CMRS Oxford Humanities Program	2022-23	√	
NYU in London	2020-21		√
QAHE (Ulst) Limited	2021-22		√
Rushmore Business School	2023-24		√
SwaN Global Education LLP	2020-21	√	
Trinity College Dublin at Belfast	2020-21		√

Union Theological College, Belfast	2022-23		√
USW Pathway College Limited	2022-23	√	
Verto Education UK Limited	2023-24	√	
Washington International Studies Council	2020-21	√	
<b>Total</b>		<b>21</b>	<b>11</b>

11 Between 2020-24, QAA undertook 32 reviews of providers seeking educational oversight. Of those 32, 21 were reviewed under the RSEO or EOEa review methods and 11 were reviewed under the HER AP or FP review methods. In all cases the outcomes were positive with no provider failing their review.

## Analysis of review outcomes

### Features of good practice

**Table 2: A summary of features of good practice by theme**

Themes	Good practice count
Academic governance	2
Digital learning and pedagogic practice	6
Learning resources	2
Learning, teaching and assessment	8
Partnership arrangements	8
Professional development	8
Staff development	3
Student support	12
Student voice	4
Use of data	1
<b>Total</b>	<b>54</b>

12 Overall, there were 54 features of good practice identified from the 32 reviews conducted between 2020 and 2024. Covering ten thematic areas, nearly 85 percent of good practice was found in six areas: digital learning and pedagogic practice; learning, teaching and assessment; partnerships arrangements; professional development; student support and the student voice.

#### Digital learning and pedagogic practice

13 Six examples of good practice were identified in this area. The good practice found revealed how the COVID-19 pandemic (2020-21) generated several changes to internal processes from varied assessment formats, technological innovations, support for both staff and students and a focus on maintaining academic standards<sup>1</sup>.

14 The evidence demonstrated that providers were agile in moving from face-to-face teaching to online platforms in response to the pandemic. They adapted course delivery, assessment methods, and support mechanisms to ensure academic continuity. A common thread among areas identified as good practice was reassessing traditional examination formats. Some institutions replaced conventional examinations with open book, time-limited

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<sup>1</sup> Accent International; Al-Maktoum College; Bader International Study Centre; Bangor University International; CAPA; Kaplan Financial.

assessments, extended essays, and projects.

15 Another area highlighted by the good practice was the support provided to academic staff. For example, new staff were given additional support in the form of mentoring and observation, while all staff engaged in continuous professional development (CPD), including training for online delivery and the effective use of digital tools to support the student learning experience.

16 The areas of good practice also highlighted the importance placed on student feedback and monitoring, whether through direct student evaluations, ambassador meetings, or formal review panels to help the providers quickly identify any shortcomings and enhance the educational experience.

### **Learning, teaching and assessment**

17 Eight examples of good practice were identified relating to learning, teaching and assessment. These included experiential and immersive learning, use of peer observation, and adopting a student-centred approach<sup>2</sup>.

18 The role of experiential and immersive learning was highlighted through field trips, internships, and practical modules, with providers using real-world experiences to help learners by gaining hands-on experience, such as an internship that gave hands-on experience in applying theoretical knowledge in practical settings. There were also examples of practitioner-led modules with guest practitioners and lecturers offering students wider perspectives and practical knowledge from professionals in a particular field.

19 The use of teaching observation was also identified as a mechanism to improve teaching quality and support student learning experience leading to improved outcomes. The evidence found teaching observations happen both formally and informally, with feedback from student feedback and/or external examiners. Teaching observation was also viewed by review teams as an opportunity to share good practice identified during observations more widely and support professional development through peer networking meetings.

20 A student-centred approach was also identified as enhancing the student learning experience through examples such as small class sizes, a focus on study skills, and early identification of areas where students needed more support, including support for academic skills, such as avoiding plagiarism in their work.

### **Partnerships arrangements**

21 The eight areas of good practice identified in partnership arrangements between the delivery providers and awarding partners included staff development and training, strong collaborative working, integration of student support and strategic alignment contributing

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<sup>2</sup> American Institute for Foreign Studies; Bangor University International College; CAPA; GIHE – UK; Irish School of Ecumenic; Union Theological College, Belfast; USW – Pathway College; Verto Education



towards a positive student experience<sup>3</sup>.

22 In one case, partnership arrangements included staff from the delivery partner being invited to participate in regular staff development sessions hosted by the awarding body. In another example staff at the delivery provider were offered reduced fees to enrol on formal professional development programmes and qualifications, such as a Certificate in Higher Education (CertHE) in higher education teaching, providing a foundation for further study and a career in education. Staff from delivery providers were also found to be invited to attend conferences by the partner institution.

23 Other areas of collaborative working identified as good practice included examples where shared responsibilities for academic standards, student support, and programme development between awarding body and delivery partner were actively encouraged. In some cases, the nature of the partnership meant that staff from the delivery provider were included in the governance structure of the awarding body.

24 Other good practice was found in support for students who were able to benefit from extensive support services offered by the partner awarding body, including access to learning resources, counselling, and IT support. In some cases strategic partnerships were found to support closer alignment between the awarding body and the delivery provider.

## **Professional development**

25 Eight examples of good practice were identified relating to professional development practices implemented by providers to improve the student learning experiences. These practices included transitions to online teaching (linking to digital learning and pedagogic practice above), internship support, the use of co-curricular activities, personalised learning tools, and practical work experiences<sup>4</sup>.

26 There were examples of providers transitioning quickly to online teaching during the COVID-19 pandemic, ensuring continuity of programs and internships with the support of awarding partners and teaching staff. This enabled students to continue with their education while maintaining the integrity of the internship programmes and student support.

27 There was evidence of good practice where providers gave structured support and evaluation that enhanced internship experiences. For example, online platforms were used as personalised learning tools that enabled students to track their learning objectives and meet professional competencies. Support also came through internship teams providing detailed feedback that enabled students to develop and improve their outcomes.

28 Another area of good practice was the use of co-curricular activities to complement the academic curriculum and support student development by integrating non-academic with

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3 Bangor University International College; Belfast Bible College; Edinburgh Napier University International College; International College, Dundee; INTO Stirling; Union Theological College, Belfast; USW – Pathway College; Washington International Studies Council.

4 Anglo-American Educational Services; CAPA; CIEE; EUSA (2020& 2024); GIHE; Centre for Medieval and Renaissance Studies; NYU in London.

academic learning, enriching the overall student experience. For example, one provider made attendance and participation in co-curricular activities mandatory, positively impacting student satisfaction and learning opportunities. While another provider embedded practice-oriented learning opportunities within its placement opportunities.

## **Student support**

29 Twelve examples of good practice were identified relating to student support areas such as the provision of comprehensive support systems, responsive and adaptive support, and support for academic and professional development. The evidence from the reviews was that where students receive tailored and effective support it helped support better academic outcomes for students<sup>5</sup>.

30 Comprehensive student support was identified as a feature of good practice where academic, pastoral and welfare needs are integrated, and where there is individualised support. One provider had developed a strategy to support good academic practice through small class sizes, early identification of problem areas, and development of academic skills alongside subject-based modules.

31 Another example was effective online learning adaptation, and the process of modifying and adjusting educational programs to be delivered effectively through online platforms and ensuring the learning experience remains engaging, accessible, and effective for students. Work placement support was also identified where it used mentors and supported professional development and employment.

## **Student voice**

32 Four examples of good practice were identified relating to the student voice, including formal and informal feedback mechanisms, active student engagement, and timely and effective responses. The good practices were found to help ensure that student voice was heard and acted upon, with evidence of feedback leading to changes in learning provision<sup>6</sup>.

33 There was evidence that the use of formal and informal methods to gather student feedback led to more comprehensive coverage and responsiveness to student needs. For example, in one case, the response to students concerns about assessment workload was addressed through a reduction in assessment. In another, the combination of formal and informal mechanisms and frequent in-class feedback sessions provided good opportunities to students to engage effectively at all levels of the organisation.

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5 American Institute for Foreign Studies; Bangor University International College; Foundation for International Education; Edinburgh Theological Seminary; GIHE; INTO Queens; INTO Stirling; Centre for Medieval and Renaissance Studies; QAHE (Ulster); SwaN Global Education; Union Theological College Belfast; Verto Education.

6 Belfast bible College; CIEE; Edinburgh Napier University International College; International College Dundee

## Other

34 The remaining areas of good practice identified relate to academic governance (2)<sup>7</sup>, learning resources (2)<sup>8</sup>, Staff development (3)<sup>9</sup>, and the use of data (1)<sup>10</sup>. An example of good practice in academic governance highlights strong academic governance and its rapid and effective response to adapting assessment in collaboration with its awarding body during the COVID-19 pandemic. In another, the other good practice covered the use of external expertise to support programme design. In the area of learning resources, the good practice was about access to learning materials and access to practice-based learning. The good practice in staff development was focused on the opportunities offered to staff to engage in CPD and collaboration on the development of learning resources. The single example of good practice in the use of data was about the comprehensive and responsive approach to data to inform improvements and enhance engagement with students.

## Recommendations

**Table 3: A summary of recommendations by theme**

Themes	Recommendation count
Academic governance	6
Admissions	4
Complaints and appeals	4
Externality	1
Learning resources	4
Learning, teaching and assessment	10
Monitoring and evaluation	8
Partnerships	3
Programme approval	2
Staff development	5
Student engagement	6
Student feedback	2
Student support	1
<b>Total</b>	<b>56</b>

35 Overall, there were 56 recommendations identified in 32 reviews conducted between 2020 and 2024. These covered 13 different thematic areas, with just over 85 per cent of the recommendations found in eight areas: Academic Governance, Admissions, Complaints and appeals, Learning resources, Learning, Teaching and Assessment, Monitoring and Evaluation; Student Engagement and Staff Development.

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7 Anglo-American Educational Services; Union Theological College, Belfast.

8 Irish School of Ecumenic; Centre for Medieval and Renaissance Studies.

9 Bader International Study Centre; CAPA; SwaN Global Education.

10 Belfast Bible College

## **Academic governance**

36 Six recommendations were made relating to academic governance<sup>11</sup>. The recommendations identified evidence of the use of informal documentation, unclear governance roles, and insufficient communication. The providers were recommended to formalise their structures, improve transparency, and ensure that monitoring and feedback mechanisms are systematically integrated into governance arrangements.

37 Areas identified as requiring attention included a lack of systematic meeting minutes and clear role definitions, no formal constitution or terms of reference for key committees, and limited distribution of committee minutes to staff. Strategic planning was also identified as requiring attention with examples of strategic plans not informed by quality assurance processes and actions plans without clear responsibilities and timelines.

38 Overall, consideration needed to be given to more formality in terms of meeting minutes, terms of reference, governance structures and ensuring the outcomes of committee decisions are communicated to staff.

## **Admissions**

39 Four recommendations were made relating to admissions<sup>12</sup>. The recommendations covered the need for more transparency in the admissions process, better public access to key policies and improved communications with applicants. A key consideration was for providers to ensure that admissions and recruitment information is regularly reviewed for accuracy and clarity to ensure that potential applicants are not misled.

40 In one case, the feedback process for unsuccessful applicants lacked detail, with rejection letters not explaining the decision or informing applicants of their right to appeal. In another case, there was no systematic approach to gathering and using student feedback on the admissions process for enhancement. It was also suggested that the collection of survey data from the admission process could be used to drive improvements.

## **Complaints and appeals**

41 Four recommendations were made relating to complaints and appeals<sup>13</sup>. These covered the need for more clarity, accessibility, impartiality, and alignment with external standards. By addressing these points, review teams considered it would help address concerns identified in the review that the complaints processes lacked fairness, transparency, and student confidence in the process.

42 The evidence found that in one case the processes did not clearly distinguish between

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11 American Institute for Foreign Studies; Belfast Bible College; EUSA (2024); IES Abroad London; Centre for Medieval and Renaissance Studies; Washington International Studies Council

12 INTO Queens; Rushmore Business School; Union Theological College, Belfast; USW Pathway College.

13 GIHE UK; Union Theological College Belfast; USW Pathway College; Verto Education.

complaints and appeals, particularly in cases involving extenuating or mitigating circumstances. The evidence found failure to differentiate between appeals and complaints, led to confusion and procedural inefficiencies. In other cases, there was lack of an independent escalation mechanism, such as referral to an independent body.

43 There was also evidence of inconsistent or incorrect information about the complaints policies, including a policy that stated decisions cannot be appealed, which contradicts information provided by the awarding partner and other internal documentation. In other cases, there was a lack of independent advice channels which may discourage students from initiating complaints due to fear of bias.

## **Learning resources**

44 Four recommendations were made relating to learning resources<sup>14</sup>. They covered the need for more consistent digital learning practices, better access to partners learning resources, and more equitable access to specialised facilities.

45 In one case while the virtual learning environment (VLE) was user-friendly and adaptable, its use for interactive learning was found to be inconsistent across staff and so had the potential to lead to differentiated student outcomes. In another, the provider was working with a partner to deliver learning resources without a formal agreement. The risk here was that, with no formal agreement in place, provision was potentially subject to unplanned change, which may impact on the student learning experience. There was also an example of students being disadvantaged when transitioning from a foundation course to degree course without prior access to the learning resources at the new delivery partner. Finally, an instance of learning resources not being included in a student survey, which was considered a gap in the monitoring and collection of quantitative and qualitative feedback that could be used to improve the student learning environment.

## **Learning, teaching and assessment**

46 Ten recommendations were made relating to learning, teaching and assessment<sup>15</sup>. The evidence for the reviews revealed issues in assessment policy clarity, moderation practices, feedback consistency, and approaches to monitoring teaching practices.

47 The evidence included cases where assessment policies did not reflect the full range of programmes or accurate grading practices, with pass marks and incorrect rounding procedures requiring greater consistency and accuracy in the policies. In one case, there was a formal requirement for moderation of assessments, but only 25% underwent moderation and double marking was applied inconsistently. This pointed toward the need for more formality in the setting, marking, and moderating assessments. Similarly, another review found the second-marking process lacked clarity regarding roles, responsibilities, and

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14 American Institute for Foreign Study; CIEE; International College Dundee; Verto Education.

15 Al-Maktoum College of Higher Education; American Institute for Foreign Study; CIEE; Edinburgh Theological Seminary; GIHE – UK; Irish School of Ecumenics; NYU in London; QAHE (Ulst); Verto Education; Washington International.

reconciliation of grades, with a lack of clarity about how external markers were appointed or how disagreements in marking were resolved.

48 Other issues identified in assessment practices included outdated policies that needed updating to reflect current practices, variable feedback in quality and alignment with rubrics and learning outcomes, and a lack of clarity on how to improve. In one case students were not provided with comprehensive assessment information and clear assessment expectations.

49 With regards to teaching practice, in one review it was found that teaching observations had significantly decreased due to the impact of the COVID-19 pandemic but that the number had not increased in the subsequent years back to the pre pandemic levels. In another case, teaching observation was hampered by the lack of a formal document outlining the purpose and method of teaching observations, with staff unclear about the process. In other cases, providers had no peer review mechanisms for teaching staff and consequently the sharing of best practice was ad-hoc and limited.

### **Monitoring and evaluation**

50 Eight recommendations were made relating to learning, teaching and assessment<sup>16</sup>. The review reports highlighted several areas where monitoring and evaluation processes required strengthening, including due to a lack of formal documentation for internal governance, unclear review processes, insufficient evaluation of professional development and retention initiatives, and the absence of integration between action planning and monitoring processes.

51 In one case, it was found the Board of Studies played a key role in the monitoring of programmes through review reports and external verifier feedback, yet the Board's role was omitted from formal documentation. In another case, documentation did not clearly distinguish between programme review and peer review of teaching with the same template used for both processes. Similarly, there was confusion created using two reporting mechanisms without clarity on the purpose and use of each report that led to duplication and misunderstanding among staff.

52 The use of action plans to monitor progress was absent in one case, with no detailed plan of how quality would be maintained in a time of significant change in student numbers. In another case, there was no formal quality oversight report or action plan to enable systematic tracking of actions or trends. Similarly, there was a case where student feedback was collected but not used systematically to enhance learning quality.

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16 Al-Maktoum College of Higher Education; CAPA; Edinburgh Napier University International College; EUSA (2020); IES Abroad; International College Dundee; USW Pathway College; Verto Education

## **Student engagement**

53 Six recommendations were made relating to student engagement<sup>17</sup>. The reports highlighted challenges with embedding student engagement meaningfully within institutional governance and quality assurance processes, with student engagement found to be inconsistent, or minimal.

54 There was evidence of students being absent from key decision-making bodies. For example, key committees that did not enable student attendance included key learning resource areas such as a library user group. In another case, students were omitted from the Academic Council and Teaching and Learning Committee and in a further example, while structures for student engagement existed, their implementation was inconsistent and formal engagement in quality assurance processes was unclear.

55 The lack of clarity of student representative roles and the support available to them to undertake their role was identified. In this case the provider acknowledged the need to develop a formal strategy to train, support, and empower student representatives to participate effectively in institutional processes. Equally, more needed to be done to encourage and facilitate student participation in committees where student attendance was found to be infrequent despite students being invited and trained.

## **Staff development**

56 Five recommendations were made relating to staff development<sup>18</sup>. The reviews found that while opportunities and frameworks exist, engagement has been inconsistent, and formal processes for peer review, CPD tracking, and blended learning training were lacking.

57 In one case, while a range of development opportunities were available, not all staff had engaged with them. Some staff have benefited from training and in some cases achieved professional recognition, while others have not participated due to conflicting work priorities. In this case, it was considered by the review team that further planning was needed to ensure all academic and professional support staff engage with development opportunities.

58 In another case, peer review of teaching was inconsistently applied and lacked a formal structure. While new academic staff were observed and informal peer review occurred, there was no consistent, equitable process for established staff. There was evidence that more formality in the peer review processes would help to support staff development and more consistent teaching quality. The recording of CPD activities was also identified as an area for improvement where it was considered that more systematic recording of CPD would provide accountability and support continuous improvement among staff.

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17 Aga Khan University (International); American Institute for Foreign Studies; GIHE; International College Dundee; QAHE (Ulst); Swan Global Education.

18 Edinburgh Napier University International College; EUSA; Edinburgh Theological Seminary; IES Abroad; INTO Stirling.

## Other

59 The remaining areas recommended for action relate to externality (1)<sup>19</sup>, partnerships (2)<sup>20</sup>, programme approval (2)<sup>21</sup>, student feedback (2)<sup>22</sup>, student support (1)<sup>23</sup>. In the case of externality while external examiners were in place for one programme, the other programme offered did not have one - this the team considered needed addressing urgently to provide full academic oversight. For partnership, the weaknesses were found in lapsed agreements that needed renewal and a lack of formality from partner visits. Weaknesses in programme approval covered the lack of a formal process for minor modifications, and module descriptors which need aligning more closely with the curriculum. In the case of student support there was a case where the mechanism for closing the feedback loop and sharing external examiner reports with students needed improving and, in another case, the need to develop a structured approach to collecting and acting on student feedback was recorded.

## Conclusion

60 The findings from the reviews present a picture of the strengths and areas for development across independent higher education providers reviewed by QAA for the purposes of educational oversight between 2020-2024 in the UK. The 54 examples of good practice and 56 recommendations, highlight both the sector's adaptability and the ongoing need in places for structural and operational changes.

61 A theme across the good practice examples is the evidence of agile response to the COVID-19 pandemic, particularly in digital learning and pedagogic innovation. Providers demonstrated resilience by transitioning swiftly to online platforms, rethinking assessment formats, and ensuring continuity in student support. This adaptability was further reinforced by strong professional development initiatives, where staff were supported through mentoring, training, and collaborative partnerships. These efforts helped to maintain academic standards and supported the student learning experience.

62 Another strength was the emphasis on student-centred learning and support. The integration of experiential learning, small class sizes, and tailored academic support contributed to positive outcomes. Providers also showed commitment to embedding the student voice through formal and informal feedback mechanisms, which in turn informed improvements in teaching and assessment practices.

63 Partnerships with awarding bodies emerged as a key enabler of quality, with shared governance, staff development, and access to broader student services enhancing the overall educational offer. These collaborative arrangements often facilitated strategic

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19 Edinburgh Napier University International College

20 INTO Stirling; NYU in London

21 CAPA; Edinburgh Napier University International College

22 International College Dundee; Washington International College

23 USW Pathway College



alignment and resource sharing, further strengthening institutional capacity.

64 However, the recommendations reveal areas where consistency and formalisation are still needed. Academic governance structures, while often effective in practice, were sometimes found to lack clarity, transparency, or formal documentation. Admissions and complaints processes similarly required greater openness and alignment with sector standards to ensure fairness and student confidence.

65 Teaching, learning, and assessment practices, although often innovative, were occasionally undermined by outdated policies, inconsistent moderation, and unclear feedback mechanisms. Monitoring and evaluation processes also varied in robustness, with some providers lacking formal action planning or systematic use of student feedback to drive improvement.

66 Staff development, while widely available, was not always equitably accessed or tracked, pointing to the need for more structured CPD frameworks. Student engagement in governance and quality assurance, though valued, was inconsistently embedded, with some institutions needing to better support and empower student representatives.

67 In summary, the thematic analysis reveals a sector that is responsive, student-focused, and committed to quality, yet still evolving in its governance and operational maturity. As the new EOR method is implemented from 2024-2025, these insights may help inform providers approach to the management of academic quality and standards.

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Southgate House, Southgate Street, Gloucester GL1 1UB  
Registered charity numbers 1062746 and SC037786

+44 (0)1452 557 000

[www.qaa.ac.uk](http://www.qaa.ac.uk)