



# Higher Education Review of Finance and Business Training Ltd

March 2015

## Contents

<b>About this review .....</b>	<b>1</b>
<b>Key findings .....</b>	<b>2</b>
QAA's judgements about Finance and Business Training Ltd .....	2
Good practice .....	2
Recommendations .....	2
Affirmation of action being taken .....	3
Theme: Student Employability.....	3
<b>About Finance and Business Training Ltd.....</b>	<b>4</b>
<b>Explanation of the findings about Finance and Business Training Ltd .....</b>	<b>6</b>
1 Judgement: The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and other awarding organisations .....	7
2 Judgement: The quality of student learning opportunities.....	18
3 Judgement: The quality of the information about learning opportunities .....	47
4 Judgement: The enhancement of student learning opportunities .....	50
5 Commentary on the Theme: Student Employability.....	53
<b>Glossary .....</b>	<b>54</b>

## About this review

This is a report of a Higher Education Review conducted by the Quality Assurance Agency for Higher Education (QAA) at Finance and Business Training Ltd. The review took place from 30 March to 2 April 2015 and was conducted by a team of five reviewers, as follows:

- Professor Christopher Clare
- Emeritus Professor Diane Meehan
- Professor Ian Robinson
- Dr Christopher Stevens
- Mr James Freeman (student reviewer).

The main purpose of the review was to investigate the higher education provided by Finance and Business Training Ltd and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the [UK Quality Code for Higher Education](#) (the Quality Code)<sup>1</sup> 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, 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
- provides a commentary on the selected theme
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

A summary of the findings can be found in the section starting on page 2. [Explanations of the findings](#) are given in numbered paragraphs in the section starting on page 6.

In reviewing Finance and Business Training Ltd the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland.

The [themes](#) for the academic year 2014-15 are Student Involvement in Quality Assurance and Enhancement and Student Employability,<sup>2</sup> and the provider is required to select, in consultation with student representatives, one of these themes to be explored through the review process.

The QAA website gives more information [about QAA](#) and its mission.<sup>3</sup> A dedicated section explains the method for [Higher Education Review](#)<sup>4</sup> and has links to the review handbook and other informative documents. For an explanation of terms see the [glossary](#) at the end of this report.

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<sup>1</sup> The UK Quality Code for Higher Education is published at:  
[www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code](http://www.qaa.ac.uk/assuring-standards-and-quality/the-quality-code).

<sup>2</sup> Higher Education Review themes:  
[www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=106](http://www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=106).

<sup>3</sup> QAA website: [www.qaa.ac.uk/about-us](http://www.qaa.ac.uk/about-us).

<sup>4</sup> Higher Education Review web pages:  
[www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/higher-education-review](http://www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/higher-education-review).

## Key findings

### QAA's judgements about Finance and Business Training Ltd

The QAA review team formed the following judgements about the higher education provision at Finance and Business Training Ltd.

- The maintenance of the academic standards of awards offered on behalf of awarding organisations **meets** UK expectations.
- The quality of student learning opportunities **does not meet** UK expectations.
- The quality of the information about learning opportunities **requires improvement to meet** UK expectations.
- The enhancement of student learning opportunities **does not meet** UK expectations.

### Good practice

The QAA review team identified the following features of **good practice** at Finance and Business Training Ltd.

- The Careers Service, which proactively provides careers and job application advice across all sites, and contributes to the development of employability in the curriculum (Expectation B4).

### Recommendations

The QAA review team makes the following **recommendations** to Finance and Business Training Ltd.

By July 2015:

- ensure that all students are registered with their awarding body or awarding organisation within the timescales required by those bodies and organisations (Expectation B4)
- ensure the accurate reporting of enrolled students' status, and changes of status, within the organisation and to external stakeholders (Expectation B4)
- ensure that assessment feedback to students is consistently timely, constructive and developmental (Expectation B6)
- ensure that the processes for internal verification of assessment tasks, and internal verification/moderation of marking, are implemented consistently and effectively (Expectation B6)
- ensure that complaints are investigated according to its procedures and in a manner that is timely and fair (Expectation B9)
- ensure that all published information about policies, programmes and academic partnerships is fit for purpose, accessible and trustworthy (Expectation C).

By September 2015:

- develop, publish and implement consistently an admissions policy that aligns fully with the Expectation of the Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education* (Expectation B2)
- ensure that the names and affiliations of Standards Verifiers are given to students in module and programme information (Expectation B7)

- ensure that Standards Verifiers' annual reports are made available, in full, to students (Expectation B7)
- ensure that internal quality assurance systems enable the Academic Board and senior managers to discharge consistently their responsibilities for academic oversight across all higher education provision (Expectation B8)
- develop, publish and consistently implement an academic appeals policy and procedures for students on Higher National programmes (Expectation B9)
- develop, publish and implement a policy and procedures for the management of work-based learning arrangements (Expectation B10).

By December 2015:

- include students who represent all delivery sites as members of organisation-level academic committees (Expectation B5)
- revise its organisation-level approach to the enhancement of student learning opportunities in order to ensure that it is strategic, systematic and coherent; and embed this at all levels of the organisation (Enhancement).

### **Affirmation of action being taken**

The QAA review team **affirms** the following actions that Finance and Business Training Ltd is already taking to make academic standards secure and/or improve the educational provision offered to its students.

- The application and further development of the resource allocation model through the work of the Academic Planning and Development Committee (Expectation B4).
- The ongoing development of the annual monitoring process (Expectation B8).

### **Theme: Student Employability**

Finance and Business Training Ltd, as part of London School of Business and Finance, is committed to exposing students to the requirements of employment and entrepreneurship. The Careers Service is highly regarded by many students, although its impact has not been felt universally; it provides careers guidance and support, and is involved in the development of employability as part of the curriculum. There are opportunities for students to engage with relevant industries. For example, the Head of Careers has conducted a series of interviews with prominent CEOs and figures in public life, and a regular programme of visiting speakers on most programmes provides students with current industry insights. London College of Contemporary Arts, another school within the London School of Business and Finance organisation, publishes a broader Creative magazine, which is a good example of how students from different programmes and delivery sites can combine to gain valuable industry experience. Some programmes have organised site-visits. For example, students have visited exhibitions, received talks from employers, and have been involved in running a Café event.

Employability skills are embedded into many students' programmes. However, many students are not aware of opportunities for work-based learning or placements on offer. The review team concludes that the London School of Business and Finance, including FBT, provides many of its students with opportunities to enhance their employability, but could extend these to cover all programmes and sites equally effectively.

Further explanation of the key findings can be found in the handbook available on the QAA webpage explaining [Higher Education Review](#).

## About Finance and Business Training Ltd

Finance and Business Training Ltd (FBT) is a Birmingham-based company whose mission is 'to prepare students for leadership, excellence and success, through providing flexible opportunities to advance knowledge and practice'. It is a wholly owned subsidiary of London School of Business and Finance (LSBF, the organisation), and manages LSBF provision in Birmingham and Manchester. LSBF is part of Global University Systems (GUS), which describes itself as 'an international network of higher-education institutions, brought together by a shared passion for accessible, industry-relevant qualifications'.

While LSBF's provision in London addresses global markets, programmes managed by FBT in Birmingham and Manchester are locally and regionally focused.

FBT has a Home Office Tier 4 licence in its own name and is thus subject to individual educational oversight arrangements. However, it is also an integral part of LSBF. Reflecting this complexity of status and circumstances, and by specific agreement with LSBF, QAA carried out two linked Higher Education Reviews of LSBF and FBT in consecutive weeks in March and April 2015. Both reviews were carried out by the same review team.

FBT's current provision comprises Pearson Higher National Diplomas (HNDs). Most of these are delivered under the management of LSBF's Vocational School at two sites in Birmingham and two sites in Manchester, where 2,171 students were enrolled at the time of this review. An HND in Fashion and Textiles is delivered by London College of Contemporary Arts (LCCA), another school within the LSBF organisation, at FBT sites in Birmingham and Manchester. FBT also offers Higher National programmes online through a learning platform managed by InterActive, another company within the GUS network.

FBT, through LSBF, has been approved to deliver Scottish Qualifications Authority (SQA) Higher Nationals, but at the time of this present review no students had been enrolled on programmes leading to SQA awards.

Until 2014 FBT provided MBA programmes leading to the award of a UK university. The organisation is seeking other UK degree-awarding bodies for the validation of Bachelor's and Master's degrees for delivery at sites including FBT.

FBT also provides professional programmes of study leading to qualifications of the Association of Chartered Certified Accountants (ACCA) and the Chartered Institute of Management Accountants (CIMA). It offers Master's programmes leading to awards of the International Telematic University (UNINETTUNO). This professional and non-UK provision was outside the scope of the present review as defined in the [Higher Education Review handbook](#)<sup>5</sup> (paragraph 19).

QAA carried out a Review for Educational Oversight (REO) in November 2012. The review report made five desirable recommendations, that FBT should: monitor and evaluate the effectiveness of the committee structure; make external examiner reports available to students; develop further the oversight of teaching and learning; consolidate oversight of peer review processes; and develop further the support for postgraduate research and scholarly activity. FBT has made acceptable progress in addressing some of these recommendations, but further work is required in some areas.

Pearson informed QAA in January 2015 that the number of Higher National students at the organisation (including FBT) that were registered with Pearson was significantly smaller than

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<sup>5</sup> Higher Education Review handbook:  
[www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2672](http://www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2672).

the number of students enrolled on the programmes. On this basis, QAA raised a Concern and referred it to the present review. Aspects of this Concern are addressed under Expectations B2, B4, B6 and B8 of this report.

## Explanation of the findings about Finance and Business Training Ltd

This section explains the review findings in more detail.

Terms that may be unfamiliar to some readers have been included in a [brief glossary](#) at the end of this report. A fuller [glossary of terms](#) is available on the QAA website, and formal definitions of certain terms may be found in the operational description and handbook for the [review method](#), also on the QAA website.

# **1 Judgement: The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and 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* 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 FBT currently delivers a range of Higher National awards aligned with the Qualifications and Credit Framework. The Higher National programmes provided by FBT have been designed to adhere to the principles defined by its awarding organisation, Pearson, which provides the regulatory frameworks for the English Higher National awards. There is some prospect that, in the future, FBT will also deliver Scottish Higher National awards under the auspices of the SQA, which also provides the Scottish Higher National regulatory framework. The regulatory frameworks for academic standards of FBT's awarding organisations enable it to meet Expectation A1 of the Quality Code.

1.2 FBT, as part of LSBF, uses LSBF's unified quality management framework and academic deliberative structure, with the addition of a Regional Development Manager for FBT's Birmingham and Manchester operations. Similarly, many executive management functions and services are shared. In many cases, the same Higher National programmes are delivered on both FBT and LSBF sites; Programme Leaderships are usually shared, and sometimes also delivery teams.

1.3 The review team tested FBT's engagement with these frameworks by examining the Quality Handbook, which describes the quality assurance processes used to prepare for

programme approval, monitoring and review; by reviewing memoranda of agreements, programme specifications and module specifications, and a report of programme approval; and by talking to staff and students, Programme Leaders, academic staff and senior staff.

1.4 The evidence demonstrates that FBT, as part of LSBF and in partnership with its awarding organisations, is able to develop comprehensive programme proposals. Agreements with Pearson and the SQA define the responsibilities of both FBT and the awarding organisations, and the Quality Handbook is designed to provide a single coherent reference point that codifies how schools and staff should approach the development and approval of a new programme (see also Expectation A3.1). These processes include the use of external peers to advise LSBF regarding alignment with the various reference points, but they have not yet been used in connection with the organisation's UK provision.

1.5 The review team considers that the regulatory infrastructure is robust, noting that the various programme specifications clearly state learning outcomes, modules and assessment for each programme. Module specifications detail the volume of assessment in each module and the learning outcomes being assessed.

1.6 The review team considers that threshold academic standards of awards are secured overall, because FBT, as part of the organisation, is delivering programmes and modules approved by its awarding organisation, in accordance with their own standards, which align with national frameworks and standards. On this basis, the review team concludes that Expectation A1 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**

1.7 Ultimate responsibility for the setting and maintenance of the academic standards of the programmes offered by FBT rests with its awarding organisation, and the award of academic credit and qualifications is made in accordance with the overarching regulations and academic framework of that organisation. This provides for considerable delegation to the organisation, which is required to have its own operational frameworks and policies.

1.8 The organisation's policies and procedures governing the award of credit are encapsulated in an organisation-wide Quality Handbook 2014-17, which aims to provide a central point of reference for all staff teaching, supporting and managing higher education provision. This is a full and detailed document, which has recently been revised. The Academic Registrar is charged specifically with ensuring compliance with academic regulations and reviewing their effectiveness, while School and Departmental Boards have a similar responsibility. There is an organisation-wide Learning and Teaching Strategy that sets out the general approach to assessment, while the Vocational School, which has an extensive portfolio of Pearson programmes, has its own Learning and Teaching Strategy which is geared to the needs of HND students. Regulations are made available to students through the virtual learning environment (VLE), and Programme Handbooks remind student of the need for compliance.

1.9 These frameworks enable the Expectation to be met. In order to test the effectiveness of these frameworks, the review team read the processes of the awarding partners and scrutinised a range of documentation, including memoranda of agreement, programme specifications and course handbooks, the Student Handbook, Staff Handbook and external examiner reports, as well as meeting staff and students.

1.10 Discussions with staff confirmed their knowledge and understanding of the academic frameworks in use. The review team also confirmed that academic staff were familiar with and used the appropriate Pearson assessment regulations. These require providers to develop and publish their own assessment regulations, and while LSBF theoretically meets this requirement through its Quality Handbook, together with a range of documents relating to assessment provided to staff on its intranet - including those relating to internal verification, assessment approval, assessment marking and standardisation, and academic misconduct - the team saw no single internal document that brings the information together. The awarding organisation's regulations also require LSBF to have an appeals policy, but this is not in place (see Expectation B9).

1.11 Notwithstanding this, the review team found that FBT, as part of the organisation, manages its responsibilities for the maintenance of academic standards in line with the requirements of its awarding organisation. Therefore, the review team concludes that Expectation A2.1 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**

1.12 The Quality Handbook states that all programmes are required to have a programme specification that identifies core information, including the aims and intended learning outcomes. Programme specifications are informed by the relevant Subject Benchmark Statements and *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ), and have information on the delivery context at LSBF. A link is provided in the Handbook to the appropriate page on QAA's website. Responsibility for the definitive programme documentation rests with the organisation

1.13 These frameworks enable the Expectation to be met. To test the effectiveness of these frameworks, the review team looked in detail at programme specifications, and course handbooks. The team tested the understanding of this process for publishing definitive documentation in meetings with academic and other staff.

1.14 The definitive programme documentation is embedded in the Programme Handbook. While the structure of the Programme Handbooks seen by the review team is standardised at school rather than at organisation level, the examples seen by the review team covered all the areas specified in the Quality Handbook and provided a definitive record. Changes to programme specifications are approved through School and Departmental Boards, and signed off by the Programme Leader. The programme specifications were shared with the review team; the organisation may wish to consider using this or another format as the basis of its definitive documentation for Higher National programmes, which would offer an opportunity for explicit version control.

1.15 The review team concludes that FBT, as part of the organisation, manages its responsibilities for the maintenance of academic standards in line with the requirements of its awarding organisation. Therefore, the review team concludes that Expectation A2.2 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**

1.16 The self-evaluation document (SED) intimates that the deliberative structure of the organisation has evolved since the QAA REO in 2012, and the structure and associated quality management procedures are described in the Quality Handbook (see also Expectation A3.3). The Academic Board reports to a new Board of Governance, and a number of subcommittees have delegated responsibility to conduct detailed academic work on behalf of the Board. The subcommittees include the Quality Committee; the Academic Planning and Development Committee (APAD); and the Learning, Teaching and Assessment Committee. The APAD and Academic Board have central roles in the development and approval of new programmes.

1.17 The APAD (which includes the APAD Operations Group) considers outline proposals from School Boards for the development of new provision. The proposals enable the APAD to scrutinise a summary of the likely curriculum, a market and competitor analysis, and proposals for validating partner and the operational resource requirements. Following successful APAD consideration, outline proposals are presented to the Academic Board for ratification, and passed to the Group Managing Director for confirmation of resourcing.

1.18 The Head of School appoints a programme development team, which either prepares, or works with the awarding organisation to prepare, detailed proposals for the new programme, which are then approved by the awarding organisation in accordance with its own procedures.

1.19 The procedures allow for an internal scrutiny of the detailed proposals before the formal approval event, which draws upon the experience of an external peer adviser to confirm alignment with the appropriate national benchmarks. However, this process has not yet been used, as FBT, as part of the organisation, has not designed any new programmes leading to UK awards since the Quality Handbook was produced.

1.20 Responsibility for formal academic approval of Higher National programmes and awards lies with the awarding organisations, which arrange detailed academic consideration in accordance with their normal procedures.

1.21 The review team evaluated arrangements for approval of new programmes by reading the various procedures in the Quality Handbook, by consideration of committee records, and through meetings with senior staff.

1.22 The review team was able to confirm that both the new APAD and Academic Board considered the launch of new provision; for example, by discussing and agreeing the introduction and resourcing of SQA Higher National awards for delivery in distance learning mode.

1.23 The review team considers that, on balance, FBT, as part of the organisation, has procedures for setting and articulating academic standards in the design and planning of academic programmes that operate successfully under the oversight of its awarding

organisation. Therefore, the review team concludes that Expectation A3.1 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**

1.24 Pearson, the awarding organisation for Higher Nationals delivered at FBT, has ultimate responsibility for the setting and maintenance of the academic standards of the programmes it delivers. The Quality Handbook sets out the principles, policies and procedures relating to assessment. The Academic Board has overall responsibility for the oversight of assessment; operational responsibility lies with the Registrar, together with the exams and assessment team. The Higher National programmes in Business and Hospitality Management delivered at FBT's Manchester and Birmingham sites are managed and overseen by the Vocational School. Small numbers of students are also studying on LCCA's HND Fashion and Textiles programme.

1.25 The Quality Handbook commits staff to using the FHEQ and Subject Benchmark Statements when designing assessments. For its Higher National programmes, FBT designs and internally verifies assessments; the review team also heard that the awarding organisation's bank of questions may be utilised. Assessments are moderated by Pearson's Standards Verifiers, who are expected to confirm that centre management of programmes and assessment decisions meet national standards. Marking and grading of students' work is carried out in line with awarding organisation requirements.

1.26 Taken together, these frameworks allow Expectation A3.2 to be met. To test the Expectation, the review team reviewed the Quality Handbook, and various documents and policies relating to aspects of the assessment process provided by FBT and its awarding organisation. It also met senior staff, Programme Leaders, teaching staff and students.

1.27 The review team found that unit and programme specifications identify aims and learning outcomes, together with assessment methods and strategies. These are made available to academic staff through the intranet and contained in Programme Handbooks. Students confirmed that they were aware of learning outcomes through their handbooks and assignment briefs.

1.28 FBT follows the awarding organisation's regulations and guidelines in its assessment of student work. The awarding organisation requires providers to develop and publish their own assessment regulations, and while FBT theoretically meets this requirement through the Quality Handbook, together with a range of documents relating to assessment provided to staff on the intranet - including those relating to internal verification, assessment approval, assessment marking and standardisation and academic misconduct - the review team saw no single internal document that brings the information together.

1.29 FBT uses Pearson's criteria and grade descriptors to assess the achievement of Higher National programme learning outcomes, which take account of UK threshold academic standards. Pearson Standards Verifiers verify that centre management of

programmes and assessment decisions meet national standards. If, following sampling of students work, assessment does not meet national standards, Standards Verifiers will identify essential actions, which, depending on their nature, may lead to certification being blocked. The provider is then expected to put action plans in place to address the identified actions. Over the past year all of FBT's Higher National programmes have been blocked for certification for a variety of reasons (see also Expectation B6).

1.30 Action plans have been produced to address the recommendations contained in Standards Verifiers' reports. Actions include: the commitment to, and delivery of, both internal training and training delivered through the awarding organisation in relation to the design and internal verification of assessment; workshops regarding the standardisation of assessment decisions; the introduction of a standard internal verification template; the appointment of Programme Leaders; regular team and BTEC-call meetings; internal quality audits; and investment in staff and physical resources. There is some evidence that these actions have resulted in improvements; for example, the Standards Verifier's report for Business in August 2014 commented positively regarding standardisation processes compared to those seen previously, but also expressed continuing concerns regarding a number of issues, including the need for more thorough internal verification (see Expectation B6).

1.31 Evidence supplied at the end of the review showed that the block on certification for students already studying on Business and Hospitality programmes has been lifted. These programmes will be subject to enhanced annual quality assurance monitoring for at least one academic year. The same evidence noted that further sampling visits were still required for Fashion and Art programmes, although the organisation subsequently confirmed that these had taken place and that they were awaiting the outcomes. (See also under B6.)

1.32 The review team concludes that standards are being maintained under the oversight of FBT's awarding organisation. There are a number of ongoing issues relating to FBT's management of assessment of its Higher National awards. These ongoing issues demonstrate that, while FBT's procedures in relation to the assessment of learning outcomes on its Higher National programmes are broadly adequate, there are still some shortcomings in terms of the rigour with which they are applied, and that there is still insufficient emphasis or priority being given to the maintenance of standards in some areas of this provision. These matters are addressed under Expectation B6. The team considers that this represents a moderate risk, which could deteriorate further.

1.33 Nevertheless, as effective oversight of standards is exercised by the awarding organisation, the review team concludes that Expectation A3.2 is met and the associated level of risk is moderate.

**Expectation: Met**  
**Level of risk: Moderate**

**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**

1.34 Since FBT's REO in 2012 the organisation (including FBT) has made a number of strategic appointments of staff with significant experience elsewhere in the higher education sector to create an organisational quality management team, through which central oversight of academic standards and quality could be strengthened.

1.35 The new quality team has led on the development of an organisation-level Strategic Quality Framework, which includes a codified Annual Monitoring Review Framework and an organisation-level Quality Handbook produced late in 2014. A second version of the Handbook was made available to the review team during the course of the review. The Handbook contains a detailed Partnerships Handbook, which clearly describes the processes in place for liaison and engagement with validating institutions, and the organisation has developed an associated policy on the development of both UK and international partnerships.

1.36 LSBF delivers Higher National programmes under arrangements with Pearson, and has approval to deliver SQA Higher Nationals. Responsibilities for monitoring and review of Pearson Higher Nationals are articulated in Pearson quality and assessment handbooks.

1.37 Responsibility for annual monitoring and periodic review of Higher National programmes is delegated by Pearson to providers, and thus lies with LSBF. FBT's Higher National programmes are insufficiently mature to be yet subject to periodic review. While recognising that such a review of its Higher National provision has not yet been required, the review team considers that the organisation will wish to ensure that procedures for conducting such reviews are clearly developed and articulated within the Quality Handbook.

1.38 The organisation's processes for annual monitoring, as applied to Higher National provision, are discussed under Expectation B8. That section of this report discusses shortcomings in the monitoring process, which have not enabled LSBF to detect and address in a timely fashion serious delays in the registration of numerous Higher National students with Pearson as their awarding organisation (see page 4 and Expectation B4), and substantial backlogs in the marking of students' assignments (see Expectation B6).

1.39 The review team noted that Pearson had addressed the registration issue and its Standards Verifiers' concerns about assessment processes by placing a block on student registrations and on certifications for awards. The fact that the awarding organisation had identified these standards-related issues, and taken action to block registration and award certification until they were resolved, demonstrated to the review team that the academic standards of Higher National awards were secure by virtue of the awarding organisation's processes and actions. On this basis, the review team concludes that Expectation A3.3 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**

1.40 Pearson, as the current awarding organisation for Higher Nationals delivered at FBT, appoints Standards Verifiers to verify the standards of provision annually (see Expectation B7). Authors of Annual Monitoring Reports are expected to draw upon comments from Standards Verifiers' annual reports.

1.41 These frameworks enable alignment with Expectation A3.4. In order to test these arrangements, the review team met staff and students, and scrutinised Standards Verifiers' reports and Annual Monitoring Reports.

1.42 The evidence demonstrates that external advice is sought and acted upon during programme and curriculum approval and review. Comments from Standards Verifiers' reports feed into programme-level Annual Monitoring Reports and their action plans. On the basis of these programme Annual Monitoring Reports, LSBF develops an organisation-level Quality Enhancement Action Plan and Quality Improvement Plan (see also Expectations A3.3 and B8).

1.43 The review team considered that the processes adopted by FBT, as part of LSBF, aligned with and contributing to the requirements of its awarding organisation, ensured externality in confirming that threshold national standards are set and maintained. The review team therefore concludes that Expectation A3.4 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 other awarding organisations: Summary of findings

1.44 In reaching its judgement about the maintenance of the academic standards of awards offered on behalf of awarding organisations, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

1.45 All seven of the Expectations in this judgement area are met, six with a low level of risk and one with a moderate risk. The moderate risk relates to the organisation's management of assessment on behalf of Pearson, which, in spite of recent improvements, continues to be less rigorous than it ought to be.

1.46 Nevertheless, the review team concludes that, on balance, the maintenance of the academic standards of awards on behalf of awarding organisations at FBT, as part of the organisation, **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 LSBF, which includes FBT, has developed its deliberative structures and procedures since the last QAA review in order to better exercise oversight of its course approval processes (see Expectation A3.1). The new Academic Planning and Development Committee (APAD) and Academic Boards are central in the development and approval of new programmes.

2.2 The APAD considers outline proposals from School Boards for the development of new provision, which address the likely curriculum, a market and competitor analysis, proposals for validating partner, and the operational resource requirements. Following successful APAD consideration, outline proposals are presented to the Academic Board for ratification, and passed to the Group Managing Director for confirmation of appropriate resourcing.

2.3 Responsibility for formal academic approval of Higher National awards lies with the awarding organisation in all cases.

2.4 These structures and frameworks allow the Expectation to be met. In its reading, the review team learned that over a period of about 18 months the resource planning presented to the APAD has matured considerably, embracing the predicted costs of both physical and staff resources; the Group Managing Director, the budget holder, has engaged personally in the consideration of resource plans. The team heard that this led to timely approval of sufficient resources to ensure the quality of the student experience. The review team was able to confirm that both the new APAD and the Academic Board considered the launch and resourcing of new provision, for example, discussing and agreeing the use of SQA Higher National awards for delivery in distance learning mode. It later learned that SQA awards were being launched in face-to-face mode to replace a number of Pearson programmes, although no records of corresponding planning discussions at the Academic Board or APAD were evident in the committee materials made available during the review.

2.5 The review team therefore believes that procedures at FBT, as part of the organisation, for planning the approaches to teaching and learning in the design of academic programmes operate appropriately under the oversight of its partner awarding organisation. The review team concludes therefore that Expectation B1 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**

2.6 The organisation's broad approach to admissions is set out in the Widening Participation Policy. This describes the organisation's 'commitment to providing accessible and flexible opportunities to engage in advancing both knowledge and practice' and contributing to the economic and social well-being in regional and local communities. It does not, however, constitute an admissions policy in line with the Expectation of the Quality Code, in terms of its scope and detail: it sets out only broad goals, and does not set out procedures for recruitment, selection and admission that are transparent, and does not indicate how provision is made for the equitable treatment of a diverse body of prospective students. During the review, FBT staff, at all levels, articulated the need to ensure that there was a balance between widening participation and the recognition of academic strengths. A distinction was also drawn between the global focus of the organisation's London provision and the regional emphasis of the Birmingham and Manchester centres (see page 4).

2.7 The organisation has a centralised admissions unit, and a detailed operational document setting out admissions procedures guidelines, including key performance indicators for the Admissions Team, which, among other things, seeks to ensure excellent customer service, compliance with UK Visas and Immigration regulations, and a 24-hour turnaround on key milestones from student application to student registration. There are procedures in place to enable students to appeal against an unsuccessful outcome. In addition, the organisation's websites provide potential applicants with instructions as to how to apply. There are detailed guidelines and procedures for the management of agents, recruiting overseas, as well as a monthly newsletter to support them.

2.8 Admissions decisions are made by the organisation itself, according to Pearson's requirements of its providers. The organisation's London-based central Admissions Team ensures that an applicant for a FBT programme is eligible for a place, and carries out a preliminary check on student funding eligibility before passing the application to the appropriate academic staff member at FBT, who makes the decision whether or not to admit. This includes those instances where the application is based on prior experience rather than formal qualifications.

2.9 The review team has noted that the Widening Participation Policy does not constitute an admissions policy. However, the team was told that FBT, as part of the organisation, had an admissions and recruitment policy, which was distinct from its admissions procedures guideline and which was accessible on its website. The team was, however, unable to confirm that such a policy existed, and found no working link to it from the website. Nor was the review team able to conclude from the various meetings it held that this policy was well-known and fully disseminated. It was provided with two admissions policy and procedure documents. While both referenced legislation up till 2007, no subsequent legislation was cited, suggesting that the document was not up-to-date. Both documents made reference to matriculation under Experience Guidelines, for those with 'non-standard qualifications', but the review team saw no evidence that such guidelines were available, disseminated, or in use. The demonstration of the SharePoint site revealed no information about matriculation under Experience Guidelines. The absence of such

guidelines and indeed of an up-to-date, readily available and widely understood admissions policy creates a serious risk that admissions decisions will be inconsistent and may lead to the admission of students to Higher National programmes who are not able to complete their course. In the light of these considerations, the review team **recommends** that FBT, as part of the organisation, develop, publish, and implement consistently an admissions policy that aligns fully with the Expectation of Quality Code, *Chapter B2: Recruitment, Selection and Admission to Higher Education*.

2.10 The review team tested the operation of the Admissions Policies and Procedures by talking to students, senior staff, academic staff and professional support staff, and by scrutinising policies, procedures and guidance, as well as portfolios identifying student achievement on admission and the reports of the awarding organisation's Standards Verifiers.

2.11 The review team noted student concerns that the organisation was recruiting students without paying sufficient attention to their ability to study, with deleterious effects on the quality of the student learning experience on some of the Higher National programmes, where it has until recently been committed particularly to a policy of widening participation. It also noted that such concerns were reflected in the reports of Standards Verifiers, who commented on low levels of previous attainment, poor English language, and bad discipline and conduct. The review team noted that the organisation had taken steps to introduce more robust admissions procedures, which included literacy, numeracy and skills testing of students prior to the decision to admit. These were set and marked by the admissions staff. In contrast to previous arrangements, the new process is standardised and embedded in the procedures for admissions, something that was visible in the comparison by the review team of portfolios made before and after the change. The effect of this shift was commented on positively by Standards Verifiers. The organisation has, in response to concerns raised about the ability to study of some of the students it has recruited, revised its Widening Participation Policy to ensure that it recruits more appropriately qualified entrants. The team urges the organisation to keep the effects of this revised approach to admissions under review. It is, however, too early to assess whether these changes will be successful in addressing the issues identified above.

2.12 The review team also noted that where students entered programmes on the basis of prior experience rather than formal qualifications at level 3, the judgment as to suitability was made by programme teams. However, the review team found no evidence of a standardised approach to the assessment of non-formal qualifications. Although the admissions procedures make reference to matriculation under Experience Guidelines, the team heard in meetings with staff that there were no formal procedures to manage and monitor such arrangements. A standardised approach to the assessment of non-formal qualifications should be an element of the admissions and recruitment policy recommended above.

2.13 Further concern about the organisation's processes for the recruitment and admission of students emerges from the review team's investigation of the non-registration of Higher National students to Pearson as the awarding organisation (page 5). This matter is addressed more fully under Expectation B4. Nevertheless, in the context of Expectation B2, the team noted the significant numbers of students whom the organisation identified as being enrolled on programmes but elected not to register with Pearson owing to non-attendance or non-submission of assignments. In the team's view, this attrition rate casts further doubt on the organisation's ability to effectively select students who are able to complete their programmes, as required by Expectation B2.

2.14 The organisation, including FBT, is responsible for admissions policy and procedures for Higher National programmes, and for decisions to admit students, but it has

no clearly defined and accessible admissions policy to govern the recruitment and admissions process, and to support the selection of students who are able to complete their Higher National programmes. In this context, the review team found that the organisation has admitted students to Higher National programmes who could not complete their programmes, either because they could not meet the academic requirements of the programme or lacked effective English language skills. Evidence of this was found in student feedback and programme board minutes. While some steps have been taken to improve recruitment, selection and admissions processes, further improvement is required and successful development in this area will be handicapped so long as it is not governed by an appropriate and adequate recruitment and admissions policy.

2.15 On this basis, the review team concludes that Expectation B2 is not met and there is a serious risk that the recruitment, selection and admissions procedures for Higher National programmes are not valid or reliable, and are not underpinned by appropriate organisational structures and processes, and thus that students are recruited who may not be able to complete their programmes.

**Expectation: Not met**

**Level of risk: Serious**

**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**

2.16 The SED states that the organisation's Learning, Teaching and Assessment Strategy is driven by its partner organisations' expectations and the Academic Signature. The review team was informed that a formal, organisation-wide Learning, Teaching and Assessment Strategy was currently under development through the Learning, Teaching and Assessment Committee.

2.17 Programme Action Plans and the annual monitoring process review performance against this strategy. Schools consider the resulting action plans and integrate these into a submission to the Quality Committee, which presents a composite report to the Academic Board.

2.18 There is a reference to the Learning Teaching and Assessment Committee, which is a subcommittee of the Quality Committee; its Terms of Reference refers to the development of a Learning, Teaching and Assessment Policy. There is an organisation-wide Learning and Teaching Strategy and a Vocational School Learning and Teaching Strategy, which is geared to the needs of HND students.

2.19 Requirements for the academic staffing of new programmes are considered as part of the resource allocation model considered by the APAD (see Expectation B4). For ongoing programmes, resource needs are identified by Programme Leaders and requests channelled through site managers or the Regional Director.

2.20 Academic staff are appointed against a 'job family model'. The Human Resources department manage appointments centrally using role specifications. Terms and conditions of employment are clearly set out in the Employee Handbook. The organisation looks to recruit and develop staff with both teaching skills and professional experience. There is currently a minimum requirement for teaching qualifications for permanent academic staff, although the review team was informed that this is not the case for associate lecturers, whose teaching abilities are discussed as part of the interview process.

2.21 These frameworks in theory allow Expectation B3 to be met. The review team tested the effectiveness of learning and teaching frameworks by reading documentation, evaluating electronic resources, and meeting with staff and students.

2.22 Once appointed, permanent staff undergo an induction process that consists of a centrally run one-day session followed by local school based programmes. These vary between schools but normally involve a mentor being assigned and teaching observation by senior school staff. There is a section in the Quality Handbook that gives guidance to managers on teaching observation evaluation. A handbook for induction is being developed. There is a probationary period of six months for new staff. The induction process for associate lecturers is more informal and locally based. Staff met by the review team commented positively on the effectiveness of the recruitment and induction procedures.

2.23 All staff, academic and non-academic, undergo a formal appraisal at least annually. This is conducted by the Head of Department or line manager, and informs discussions on staff development. Staff are encouraged (but not obliged) to use the results of peer observation in the appraisal discussions. Associate lecturers are not subject to the same formal appraisal process as permanent staff but do undergo a series of meetings with programme and module staff at school level.

2.24 The SED states that staff are encouraged to engage in professional and other networks. Staff development requirements for individuals are discussed as part of the appraisal process. Subject to funding being available, activities such as conference attendance can be supported. Permanent staff wishing to take further qualifications can be given relief from timetabled duties to support their programmes.

2.25 Staff attend teaching and learning conferences and teaching discussions put on by the current awarding organisation. The Quality Handbook has a section on staff development that refers to the Human Resources department offering regular workshops. The review team found evidence of staff development workshops on a number of topics.

2.26 A peer observation system is set out in detail in the comprehensive Quality Handbook. The peer observation process is described. It refers to three models (developmental, judgemental and reciprocal-reflective) and goes into considerable detail on the merit of, for example, pre-meetings and debriefings to supplement the observation process.

2.27 Staff confirmed that peer observation had been implemented following a pilot having been run in the Business School, and the review team was presented with evidence of its operation. The process is welcomed and well regarded by the staff met by the team. It is confidential to the observer and observed, and is developmental in nature. However, staff are able to use the results as part of their appraisal discussions and staff development requests. Training for peer observation is available.

2.28 Students reported that teaching is generally excellent. They were enthusiastic about the quality of the teaching they received, support provided and general availability of staff.

2.29 There is a clear statement of intent on the involvement of students in quality assurance and parts of this statement refer to feedback from students on teaching and learning. LCCA has a Student Council, whose Terms of Reference include the facility for representation to the Dean of School and Programme Leaders. LCCA also operates a Staff/Student Liaison Committee (SSLC), with detailed Terms of Reference and membership set out in the Quality Handbook. The Student Council and SSLC are at present confined to LCCA, but are being developed to operate across all sites, including FBT. There is also evidence of summaries of student feedback at school level for the Business, Vocational and Professional Schools, all of which address teaching quality (see also paragraph 2.57).

2.30 The review team concludes that Expectation B3 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**

2.31 The SED comments briefly on the organisation's management of learning resources and the learning environment. It refers to an estate strategy and a 'learning resources statement', which describes, for each campus, teaching space, ICT facilities and library facilities. Reference to resource issues appear in some of the committee minutes, including the Academic Board. The Academic Planning and Development Committee (APAD), which reports to the Academic Board, is the forum in which the resource implications of academic developments come together. APAD membership includes heads of service departments who are charged with implementing any resource requirements agreed at the meetings.

2.32 The review team tested the effectiveness of the organisation's arrangements for the provision of learning resources and facilities by reading documentation, evaluating electronic resources, and meeting with staff and students.

2.33 The minutes of the APAD show the existence and use of a resource allocation model. The model has been introduced for consideration of new programme proposals, taking account of target Staff-Student Ratios. The organisation informed the review team that this resource allocation model was introduced in 2012-13, but the team was unable to find evidence of its use in the minutes of the APAD before October 2014, when a revised model was introduced. Through scrutiny of APAD minutes the team found that this relatively recent development was beneficial in ensuring appropriate consideration of the resource requirements for new programmes. This development should help to avoid in future the problems of limited resources, at some sites, which have been reported by students. The review team **affirms** the application and further development of the resource allocation model through the work of the Academic Planning and Development Committee.

2.34 For ongoing programmes, Programme Leaders are responsible for voicing any concerns over resources at school meetings. Such concerns can arise from student feedback or from staff. Requests are channelled through centre managers or the Regional Director, with requests for additional staffing presented through a Hiring Request and Authorisation Form.

2.35 Students met by the review team did not raise any major concerns over resources. There were comments about a short-notice campus move, and some concerns were expressed about library provision at some sites, but in general students met by the team were of the view that the organisation responded to any major concerns over resources. There is professional library support at the Birmingham site, and all IT support is provided from London.

2.36 The organisation has an Employability Strategy, which sets out clear objectives on how students will be helped into employment. The driver behind this is the careers and employability department. The SED addresses the issue within the main sections and in the theme. From its reading of the documentation, and from meetings with staff and students, the review team found that these measures work across all FBT sites.

2.37 The Careers Service received considerable praise from students. This was also reflected in meetings with students. The Careers Service proactively manages its arrangements through the schools and is represented at school-level meetings. The Careers

Handbook is comprehensive, covering self-assessment and networking, through CV development to interviews. A number of initiatives, such as the Great Minds video clips, in which a number of business leaders discuss aspects of employability, add further support for employability skills development. The Careers Service is also proactive in the development of work-based learning modules for a new Master's programme. In light of the above, the review team concludes that the Careers Service, which proactively provides careers and job application advice across all sites, and contributes to the development of employability in the curriculum, is a feature of **good practice**.

2.38 The SED does not comment in detail on student support, especially personal support. Some aspects of student support, such as the counselling service are detailed in Student Handbooks and on the organisation's website. There is a detailed section of the Quality Handbook dealing with equality and diversity, which comprehensively describes various forms of disability that can affect students. It outlines a number of possible reasonable adjustments and other forms of support that can be made to cater for these disabilities. The Disability Office coordinates the application of this support through the development of an individual support plan. Guidance is provided for students through a comprehensive Student Disability Services Handbook.

2.39 There is no single, organisation-wide system of academic or pastoral support for students; each of the schools and sites has developed its own method. In some cases, the Programme Leader provides personal tutoring, and in the case of Higher National students, personal tutors were allocated. Students met by the review team acknowledged these differences but all were confident that they had various staff they could go to for any problems. Students also praised the helpfulness and availability of staff.

2.40 Pearson requires that providers of programmes leading to its awards operate a registration process that is timely, auditable, reflects programmes and time spent on programmes, and has a defined process for exception reporting. It requires providers to investigate inaccurate, early, late or fraudulent registration and certification claims.

2.41 In January 2015, Pearson informed QAA that LSBF had identified a large number of students enrolled on programmes leading to Higher National awards who were not registered with Pearson (see pages 4-5). QAA referred the investigation of this issue to the present review and the review team addressed it primarily under Expectation B4, since students' registration with Pearson is a prerequisite for the achievement of their awards and, therefore, fundamental to enabling their academic success. Other aspects of this registration issue are addressed under Expectations B2, B6 and B8 of this report.

2.42 The review team noted that on 2 December 2013 Pearson emailed the organisation (including FBT) stating that the deadline for registering students enrolled at the beginning of the 2013-14 academic year had passed on 15 November. The email reminded the organisation of Pearson's requirement to have all other students registered within 30 days of enrolment, including for students on programmes delivered outside the standard academic year. Pearson requested that the organisation review its registrations to ensure that all students enrolled had been registered and set a deadline of 31 December 2013 for the reconciliation of all enrolments and registrations. The evidence shows that the organisation did not meet this deadline.

2.43 Beginning in November 2013 the organisation carried out a series of internal audits of its student records. The first audit identified 1,706 students who were enrolled but not registered with Pearson. A second audit, carried out some time before the end of February 2014, found 1,500 unregistered students. A third and more wide-ranging audit in December 2014 put the numbers of unregistered students at 4,172. At the review visit the organisation gave the review team a briefing note, which stated that the total number of enrolled and

unregistered students was about 700. These audits accounted for multiple points of registration throughout the academic year and incorporated distinctions between active, inactive and withdrawn learners. The December 2014 audit used data checked by administrative teams across the organisation.

2.44 The review team compared the numbers of unregistered students identified by the organisation's audits with the numbers of students it had registered or attempted to register with Pearson over the same period. The team noted that, of the 1,706 unregistered students identified by the November 2013 audit, the organisation had decided to register 853. In July 2014 the figures given by the organisation to Pearson indicated there were 331 unregistered students (145 at FBT in Birmingham and 186 in Manchester), against the 1,500 suggested by the February audit. Of the 4,172 unregistered students identified in December 2014, the organisation (including FBT) decided to register 1,020, the remaining approximately 3,000 students apparently having no attendance or assignment records. In January 2015 the organisation notified Pearson of 560 unregistered students studying at FBT. For Manchester programmes, the audit revealed 3,107 unregistered students. Of these, the organisation decided that 782 needed registering and 102 needed further consideration. In January 2015 the organisation notified Pearson of 403 previously unregistered students at Manchester. As of 28 January 2015, Pearson had 5,281 students at the organisation (including FBT) registered in total. However, counting only those unregistered students whom the organisation definitely intended to register, the December 2014 data suggests that the total should be 6,414 for FBT Birmingham and Manchester sites alone. The evidence is, therefore, that in January 2015 the organisation (including FBT) did not notify Pearson of every unregistered student it had identified in its December 2014 audit as requiring registration.

2.45 The review team's analysis of the registration of students with Pearson gives rise to three serious concerns about the organisation's management of student learning opportunities.

2.46 The first concern is that by failing to register all students enrolled on Higher National awards by the deadlines prescribed by Pearson the organisation (including FBT) has jeopardised the ability of those students to achieve the awards they are studying for. While it is noted that Standards Verifiers' reports suggested that there was no evidence that students had been disadvantaged in terms of academic delivery and assessment, in the review team's view this represents a fundamental failure by the organisation to discharge its responsibility to enable students to develop their academic potential. The team noted that on 1 April 2015 Pearson informed the organisation that it was 'prepared to accept registrations of Business and Hospitality students, in principle, subject to a full review of learner work'. At the time of the review, however, other students had no guarantee of their registration. The review team **recommends** that FBT, as part of the organisation, ensure that all students are registered with their awarding body or awarding organisation within the timescales required by those bodies and organisations.

2.47 The second concern relates to the significant numbers of students whom the organisation (including FBT) identified as being enrolled on programmes but elected not to register owing to non-attendance or non-submission of assignments. In the review team's view, this attrition rate represents a further serious failing by the organisation to discharge its responsibility to support students in making successful transitions to higher education and academic progression. It also contributed to the team's concern about the organisation's ability to effectively select students who are able to complete their programmes, as required by Expectation B2.

2.48 The third concern relates to the effectiveness of the management information systems at the organisation (including FBT). The review team noted the organisation's

difficulties in establishing the numbers of its Higher National students who were enrolled but not registered with Pearson, those not attending, and those who had withdrawn. Moreover, during the review process, the review team was unable to secure accurate and consistent information from the organisation as to the status of enrolled students. It concluded that the absence of accurate data held at organisation level had contributed to the problem of determining which students were unregistered with Pearson. In the absence of a reliable system for identifying accurate student numbers, the organisation's ability to monitor and evaluate the effectiveness of its processes for enabling students to develop their academic, personal and professional potential is fundamentally impaired. The review team, therefore, **recommends** that the organisation (including FBT), ensure the accurate reporting of enrolled students' status, and changes of status, within the organisation and to external stakeholders.

2.49 The review team heard that registration with Pearson was treated by the organisation as a secondary process, which took place only when it was confirmed that student funding from the Student Loans Company had been secured. The team heard that, as a result of this, several programmes were still blocked at the time of the review visit, so that a large number of students studying for Higher National awards with the organisation, including FBT, remained unregistered.

2.50 The team found that the organisation (including FBT) had responded to the issues of inaccurate and incomplete Higher National student data by establishing a Student Withdrawal Policy. It had also set up a Withdrawal Committee, which issues regular withdrawals reports to senior managers. It began to implement these measures in August 2014. This development should strengthen the capacity of the organisation (including FBT) in future to hold and maintain accurate and complete information about its students.

2.51 The review team found that part of the provision for supporting student achievement at the organisation (including FBT) is satisfactory, with a significant area of good practice in the work of its Careers Service. However, the team notes that the resource allocation model (paragraph 2.33), introduced in part to address problems of resource provision, is a relatively recent development, and its effectiveness is not yet fully proved. Moreover, in respect of its Higher National provision, the organisation (including FBT) has fundamentally undermined the achievement prospects of many students by failing to register them with Pearson, the awarding organisation. The team notes that the organisation (including FBT) was aware that it had this problem of non-registration in 2013, yet it had not fully resolved it at the time of this present review. As a result of its failure to register students with Pearson in a timely fashion it had put their educational and other interests in jeopardy. On this basis, the review team concludes that Expectation B4 is not met and the risk is serious, especially to those Higher National students who remained unregistered at the time of the review visit.

**Expectation: Not met**  
**Level of risk: Serious**

**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**

2.52 Student representation and engagement in quality assurance at FBT operates through a mix of organisation-wide policies and school or site-specific practices depending on a student's programme. The organisation's Strategy Index commits it to providing 'enhanced roles and opportunity to capture the "student voice" in our review and communication processes'. A recently revised Student Engagement Strategy defines an approach to student engagement that is influenced by 'student as producer' developments in the sector and seeks to involve students in all aspects of decision-making. The Quality Handbook further elaborates the strategic approach to student engagement in quality assurance, listing, for example, its commitment to open feedback that is acted on and used to enhance and monitor the provision.

2.53 Student Liaison Officers are tasked with maintaining regular contact with students, but some of these posts are vacant. While the overall approach to student engagement is evaluated by the Learning, Teaching and Assessment Committee; Quality Committee; and Academic Board, school-level Learning and Teaching Committees and School Boards also have a role in monitoring and supporting representation activities. Moreover, Programme Committees Terms of Reference include the evaluation of student engagement effectiveness and reviewing feedback.

2.54 Across the organisation, elected representatives are responsible for gathering students' views. A Class Representative Policy defines the role and responsibilities of class representatives, who are elected for each learning group at the beginning of an intake. The Quality Assurance team and Deans of Schools are responsible for disseminating the Policy, and Programme Leaders support its implementation.

2.55 However, at present, the structures through which students represent their peers vary between the organisation's component schools. Students at LCCA (see page 4) have recently formed a Student Council, consisting of one Student Councillor from each LCCA Higher National programme, including those at FBT. A Head of Student Council is elected from within this group. Student Councillors disseminate information to their peers and participate in a two-tier system of Faculty Forums, which enable them to meet with their respective Programme Leaders twice-monthly before holding a monthly meeting with the Dean of School and other senior staff to discuss ideas and recommendations. Student Councillors gather feedback through the wider system of class representatives described above.

2.56 LCCA has also piloted a system of Staff/Student Liaison Committees (SSLCs), which other schools across the organisation intend to adopt where no SSLCs already exist, as is the case at the FBT sites in Birmingham and Manchester. Meeting at least twice per year, SSLC membership includes elected class representatives from all programme years and routes, as well as staff representatives, including Programme Leaders. Schools are required to facilitate cross-campus communications where appropriate. Formally, SSLCs are subcommittees of each School Board but may also refer matters to Faculty Forums or Learning and Teaching Committees. SSLCs may consider external examiners' or Standards Verifiers' reports, feedback from surveys, changes to the programme, resource planning and reports from Programme Leaders. School Boards should consider SSLC minutes and responses/minute extracts will be placed on notice boards.

2.57 At FBT's Manchester and Birmingham sites, class representatives attend the Vocational School's monthly site-wide Student Forums with Programme Leaders, administration and welfare managers. Minutes from these forums are published on the organisation's VLE. A Student Engagement Team is supporting the recently reconstituted Students' Association, which combines a representative function in some schools with a broader remit to coordinate social activities. The FBT handbook states that the Students' Association has recently expanded to Birmingham and Manchester from London, although the review team had evidence that the Students' Association was still a work in progress at some sites and schools.

2.58 At programme level, two elected student representatives from each year can attend the Programme Committees held each semester. At school level, student representatives have membership of School Boards, and in the case of the LCCA can be nominated by SSLCs. Where applicable, there is provision for the Head of Student Council to attend school-level Learning and Teaching Committees. In principle, students can be represented on organisation-wide committees, although there is no guarantee these representatives will have been elected by students studying at FBT. The organisation-wide Learning, Teaching and Assessment Committee will consider responses from 'wider student representation' relating to enhancement, and its Terms of Reference provide scope for the Students' Association President to attend as an ex-officio member. The Quality Committee Terms of Reference give membership to one student representative, nominated by the Students' Association. The President of the Students' Association or a nominee is formally a member of the Academic Board. Likewise, the Academic Planning and Development Committee (APAD) Terms of Reference include student membership. The President of the Students' Association can attend the new Board of Governors, which advises the Board of Directors.

2.59 Module and tutor evaluations are used to gather feedback while programmes are still running. The organisation has defined a set of common principles to guide survey implementation, which state that surveys will take place mid-term, feed into SSLCs and Teaching and Learning Committees, have time set aside for whole-class discussion, and, once analysed, be placed on notice boards. End-of-module evaluations are a requirement for all modules and uses standard questionnaires across the provision. Deans of Schools arrange for analysis of paper-based responses and return outcomes to Programme Leaders for review. Summaries should be made available to programme teams and an analysis retained in 'module boxes' for use in quality assurance. In 2014, the organisation undertook an NSS-style survey, which ran on all programmes and sites. Results will be made available on the intranet and on notice boards. Analysis takes place at programme level, but informs programme summary reports, which will be considered at school level. LBSF also surveys students about careers and other support services and these are overseen by the Head of Internal Audit, Processes and Student Engagement. Annual Monitoring Reports require comment both on student representation procedures and student feedback.

2.60 The range of representation structures and feedback mechanisms allows Expectation B5 to be met. To test the effectiveness of these policies and procedures, the review team scrutinised internal quality assurance documentation and committee minutes, and also met a wide range of staff and students.

2.61 In the past, communication between staff and students has not always been effective, but students now see improvements since the introduction of representation structures. That said, some students still feel that sometimes staff do not respond quickly enough to issues.

2.62 The organisation has reassessed its approach to student engagement and representation. The 2014 Annual Monitoring Self-Assessment Report identified weaknesses in the implementation of school-level student engagement strategies. In October 2014, the

Quality Committee concluded that the organisation had a 'disparate' approach to student engagement and that this needed to become consistent across schools. As a result of these comments and earlier reviews, the Vice-Rector instigated refinements to the Student Engagement Strategy and organised supporting activities across all sites. For example, both staff and student representatives across the organisation have recently been involved in Quality Improvement and Enhancement Workshops, which focused on defining the role of the student representative. A Vice-Rector's Achievement Award, which will be granted to those representatives who reflect on the skills acquired in their role, is also being developed. The team noted that an updated version of the Strategic Institutional Enhancement Plan 2015-18 outlined a number of actions concerning oversight of student engagement, which would be monitored by the Senior Management Team and the Executive Chairman's Action Group. The Quality Committee also reviewed the Student Engagement Strategy and committed the organisation to 'placing the student at the centre of decision making'.

2.63 Most Programme Handbooks outline the structures of student representation in place for each programme and include the Class Representative Policy. However, some older handbooks like that of HND Business 2014, did not describe any representative system.

2.64 In general, the class representative, Student Council, and liaison forums operate effectively. Although only established during the 2014-15 academic year, the Student Council enables LCCA students from all sites to give feedback to their school. The Student Council's Terms of Reference were formally approved in January 2015. While the Student Council is an effective means of raising issues, councillors representing LCCA programmes delivered at FBT sites in Birmingham and Manchester have not always been able to attend. That said, Programme Leaders recognise an improvement in communication between staff and students since the introduction of Student Councillors, and class representatives have held useful meetings with Programme Leaders. Publicity for Student Councillor's work across sites in the LCCA magazine *Creative* is very effective. Although the system is not as well-developed as in LCCA, students in the Vocational School hold regular and effective meetings with staff, and receive responses to the points raised regardless of where they are studying. However, the team heard that some groups studying at FBT do not have active representatives.

2.65 In addition to these school-level systems, an organisation-wide Student Engagement Meeting was introduced in July 2014. This focus group allowed student representatives to feedback on issues such as recruitment, programme delivery and administration to senior staff.

2.66 Some student representatives have received training, organised either by site-specific support staff or the Student Engagement Manager, but others were not aware of this.

2.67 However, arrangements for directly involving FBT students in quality assurance and enhancement are less effective. At programme level, some students have few opportunities to directly participate in decision-making committees. Students do not attend Higher National programme team meetings. Nor were students recorded as attending any of the Higher National Programme Committee meetings in the minutes provided, despite their formal membership. Furthermore, Programme Committees in the Vocational School do not regularly refer to SSLCs or similar representation activities.

2.68 In spite of their formal membership, there is little documentary evidence that students participate in school-level committees. School-level Learning and Teaching Committee minutes do not show that student representatives attend or are invited.

Likewise, no student representatives have attended LCCA's School Board meetings in person or virtually.

2.69 There is little documentary evidence that students currently participate in the organisation-wide committees they are formally members of. While the Students' Association President is an ex-officio member, there is no evidence they have attended Learning, Teaching and Assessment Committees. Similarly, there is no evidence that student representatives attend, or are invited to attend, the Quality Committee. Nor have students attended the APAD. While the LSBF Students' Association President occasionally attended the Academic Board in the past, the committee recognised in July 2014 that this was no longer occurring. The President has, however, attended a meeting of the new Board of Governors.

2.70 Furthermore, the review team confirmed with staff and students that the current terms of student's membership of organisation-wide committees do not allow for the representation of students studying in Manchester or Birmingham. The review team therefore **recommends** that FBT, as part of the organisation, include students who represent all delivery sites as members of organisation-level academic committees.

2.71 Despite some evidence that feedback and feedback analysis systems have not been long-established, the organisation now collects a good range of student feedback about programmes offered at FBT. A draft Quality Monitoring Calendar coordinates organisation-wide survey activities. Induction surveys gather feedback about the organisation of, and information received at, programme-level inductions. Module surveys allow a range of qualitative and quantitative feedback to be gathered about teaching. This feedback is used during partnership reviews, programme and module-level annual monitoring, although the extent to which this is analysed varies considerably. At present, students are not directly involved in the organisation-wide programme approval process, although staff who teach across the organisation highlighted changes to programme content made in response to feedback. Students at FBT feel that their feedback has been used to improve teaching, although they do not always see the results of surveys.

2.72 Some School Boards note student feedback but do not consider many of the negative issues students raised in detail. The Senior Management Team does not regularly record its consideration of student feedback; although organisation-wide committees, such as the Quality Committee, and workshops have considered survey results, the analysis recorded was not as detailed as it could be. Improvements to the organisation's survey system have been considered, however. Given the proportion of negative comments from students across the organisation in recent feedback, senior staff may wish to undertake a deeper analysis of qualitative comments received from students studying at FBT as opposed to relying solely upon the quantitative data.

2.73 The review team concludes that the use of effective class representation forums, focus groups, and surveys means that Expectation B5 is met. However, FBT students at Birmingham and Manchester are not represented on organisation-level committees. The team concludes therefore that, given this lack of systematic student representation in the organisation's deliberative processes, the associated level of risk is moderate.

**Expectation: Met**  
**Level of risk: Moderate**

**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**

2.74 The organisation-wide Quality Handbook sets out the organisation's principles, policies and procedures relating to assessment. The review team heard in meetings with senior staff that the Academic Board has ultimate responsibility for the oversight of assessment, and that operational responsibility lies with the Registrar, supported by the exams and assessment team.

2.75 For its Higher National programmes, FBT, as part of the organisation, designs and internally verifies assessments; the review team also heard that the awarding organisation's bank of questions may be utilised. Assessments are moderated by Standards Verifiers, who are expected to confirm that centre management of programmes and assessment decisions meet national standards. Marking and grading of students' work is carried out in line with the awarding organisation's requirements.

2.76 For the Vocational School's Higher Nationals at FBT, Assessment Boards are organised centrally and have normally been Chaired by the Register, although at the time of the review the number of Chairs was being increased, and revised guidance for Chairs had been produced. For Higher National programmes offered through LCCA, Assessment Boards are organised by LCCA and Chaired by the LCCA Head of Operations.

2.77 Processes for the recognition of prior learning are governed by, and operated in accordance with, the awarding organisation's regulations.

2.78 Taken together, these frameworks in theory allow the Expectation to be met. To test the Expectation, the review team reviewed the Quality Handbook; various documents and policies relating to aspects of the assessment process provided by FBT and its awarding organisation; Standards Verifiers' reports; and minutes of staff and programme team meetings, and Assessment Boards. It also met senior staff, Programme Leaders, teaching staff and students.

2.79 Over the past year, all of FBT's Higher National programmes have been blocked for certification by Pearson for a variety of reasons, including but not exclusively in relation to essential recommendations made in Standards Verifiers' reports. Standards Verifiers have called for essential actions to improve internal verification and standardisation procedures, and feedback to students. For example, the March 2014 Standards Verifier's report for HND Business identified a number of essential actions, including those relating to the standardisation of assessment decisions and the internal verification of assignments across sites, as well as the need for timely registration and withdrawal of students. Resourcing issues have also been raised.

2.80 Action plans have been produced to address the recommendations contained in Standards Verifiers' reports. Actions include: a commitment to, and delivery of, training (internally and through the awarding organisation) in relation to the design and internal verification of assessment; the standardisation of assessment decisions; the introduction of a standard internal verification template; an internal quality review process; the appointment of

Programme Leaders; and regular team meetings, including BTEC-call meetings and 'academic huddles'. There is evidence that these actions have resulted in some improvements: for example, the Standards Verifier's report for Business in August 2014 commented upon an improvement in standardisation processes compared to those seen previously. However, the same report noted the need for more thorough internal verification. The review team **recommends** that the organisation, including FBT, ensure the processes for internal verification of assessment tasks, and internal verification/moderation of marking, are implemented consistently and effectively.

2.81 The review team saw extensive evidence of discussion, in minutes of meetings at organisation and programme levels, about a large backlog of unmarked student work from Higher National programmes. This backlog, which the organisation describes as 'legacy marking', has been discussed with the awarding organisation and addressed in action plans. The team explored this issue with FBT and heard that this had resulted from ineffective management in the Vocational School, the Head of which had been replaced, and the fact that some tutors had left. The team was also told that this issue was now under control and the backlog was cleared, and that mechanisms have been put in place to ensure that tutors had sufficient time for marking at the end of teaching periods. However, the team noted that the minutes of team meetings in February and March 2015, while showing that these issues were being addressed, were still discussing the need to mark a substantial number of pieces of work from this backlog. The minutes of a HND team meeting recorded the fact that some tutors were still not marking current student work on time. The team also heard that additional marking was now being created by resubmissions arising from the recently marked backlog.

2.82 The situation has been compounded by the non-registration of a large number of students with the awarding organisation. FBT internally verifies and moderates the work of all students enrolled on its Higher National programmes, whether or not they have been registered with the awarding organisation. However, the assessed work of unregistered students is not eligible for sampling and external moderation by the Standards Verifiers, thereby potentially undermining the integrity of the award. Recent evidence from the awarding organisation indicates that for Hospitality Management and Business programmes the unregistered learners 'appear to have been subject to the normal internal quality assurance processes required for these qualifications, and have been able to achieve the standards of work expected for students at this level'. On this basis, Pearson, the awarding organisation, is prepared in principle to accept registrations for the currently unregistered learners for these programmes, subject to a full review of learner work and assessment records for each learner. Hence, the block on certification for students already studying on Business and Hospitality programmes has been lifted. These programmes will be subject to enhanced annual quality assurance monitoring for at least one academic year. The same evidence noted that further sampling visits are still required for Fashion programmes. The organisation has confirmed that these have now taken place and that it is awaiting the outcomes.

2.83 The review team explored FBT's expectations in relation to feedback on assessment to students and heard that feedback is expected to be returned in two-four weeks for students on Higher National programmes. Students who met the team reported substantial variations in the time taken to receive feedback from a few weeks, to eight months, to a year; one student noted that they had just received grades back from work submitted in November 2013. There is also some criticism of the quality of feedback to students in a recent Standards Verifier's report. The team explored how FBT, as part of the organisation, was addressing the timeliness of student feedback, and heard that some student dissatisfaction related to legacy-marking issues. Feedback to students on Higher National programmes is now overseen by Programme Leaders, who track the marking process through the intranet system and view the feedback provided. Students can also use

this system to see if their assignments have been marked. While, in the team's view, this system has the potential to improve the timeliness of feedback in particular, students, as noted above, remain dissatisfied. The review team **recommends** that FBT, as part of the organisation, ensure that assessment feedback to students is consistently timely, constructive and developmental.

2.84 The organisation has developed policies relating to academic misconduct. Plagiarism disciplinary panels are held for students suspected of academic misconduct. Students confirmed that they were aware of academic misconduct and how to avoid plagiarism through their handbooks and assignment briefs.

2.85 Assessment Boards relating to Higher National provision are held on a weekly basis; the review team heard that this was related to the volume of work to be processed, including first submissions and resubmissions. Minutes of the Boards are brief and the number of staff attending small; notwithstanding these comments, the minutes suggest that the Boards are operating in accordance with their stated Terms of Reference.

2.86 FBT has had multiple and ongoing issues in relation to its processes for, and management of, assessment in relation to its Higher National programmes. Issues relating to legacy marking have been significant, which in turn have impacted on FBT's ability to provide timely and helpful feedback to students. At some point over the past year, all of FBT's Higher National programmes have been blocked for certification for a variety of reasons relating to the management of academic standards. These issues have arisen due to ineffective operation of parts of the governance structure as it relates to quality assurance, as the organisation has acknowledged in meetings with the review team, as well as significant gaps in procedures relating to the management of assessment in Higher National programmes. The team recognises that the organisation is now addressing these issues across its delivery sites, including FBT, but it is too early to assess fully the effectiveness of the measures put in place. In addition, there is recent evidence that some issues remain. The review team found therefore that FBT, as part of the organisation, is not consistently operating equitable, valid and reliable processes of assessment, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification for which they are studying. For these reasons, the review team concludes that Expectation B6 is not met and the risk is serious.

**Expectation: Not met**

**Level of risk: Serious**

## **Expectation (B7): Higher education providers make scrupulous use of external examiners.**

### **Quality Code, Chapter B7: External Examining**

#### **Findings**

2.87 Pearson, as the awarding organisation for current Higher National provision, is responsible for the appointment and management of Standards Verifiers. Standards Verifiers work to the protocols of the awarding organisation; they moderate assessments and are expected to confirm that centre management of programmes and assessment decisions meet national standards. Their reports are received by the Registrar and forwarded to Programme Leaders, who have overall responsibility for formulating a response and associated action plan. They are considered in Annual Monitoring Reports at programme, School and organisation level. The Quality Committee is charged with considering these reports and responses to them, and a summary is reported to the Academic Board.

2.88 These arrangements allow the Expectation to be met. The review team tested this Expectation through scrutiny of: the Quality Handbook; Standards Verifiers' reports and responses to them; Terms of Reference and minutes of the Academic Board and Quality Committee; and Annual Monitoring Reports. The team also met senior staff, Programme Leaders, teaching and support staff, and students.

2.89 The review team saw evidence of consideration of Standards Verifiers' reports at the Quality Committee and Academic Board. Standards Verifiers' reports read by the team raised a number of concerns. For example, the 2013-14 report for Business programmes raised essential actions in a number of categories, including: the management of academic standards; the effectiveness of assessment instruments; the maintenance and audit of records; and registration and certification claims, resulting in certification being blocked (see also Expectations A3.2 and B6). While the 2013-14 Standards Verifiers' reports for the HND Hospitality programme were more positive regarding assessment, the report raised issues relating to library resources and the need to improve the quality of the student intake. The team saw evidence that some improvement was noted in the subsequent Standards Verifier's report for HND Business, although this also indicated that concerns such as the need for more thorough internal verification remained.

2.90 A desirable recommendation arising from the 2012 QAA REO report was that FBT made external examiners' reports available to students. The review team heard that Standards Verifiers' reports are shared with student's representatives and made available in the library for students. The minutes of a BTEC-call meeting in December 2014 noted that Standards Verifiers' reports should be shared with students, with any confidential information removed. Students who met the team were not aware of Standards Verifiers' reports or where to find them. The review team **recommends** that FBT, as part of the organisation, ensure that Standards Verifiers' annual reports are made available, in full, to students.

2.91 The review team confirmed with the organisation that the names of Standards Verifiers and their affiliations were not made available to students in module and programme information, and the team was not made aware of any plans to do so in the future. The review team **recommends** that FBT, as part of the organisation, ensure the names and affiliations of Standards Verifiers are given to students in module and programme information.

2.92 The review team concludes that FBT complies with its awarding organisation's processes for standards verification. Reports are received and responded to, and action plans are drawn up and monitored. Students are unaware of where to access Standards

Verifiers' reports, and their names and affiliations are not given to students through module and programme information. Notwithstanding the two recommendations addressing these issues, the review team concludes that Expectation B7 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**

2.93 Current Higher National programmes are delivered under arrangements made with Pearson. Responsibilities for periodic review of Higher National programmes are delegated by Pearson to the organisation (including FBT). FBT's Higher National programmes have not been running long enough to be subject to periodic review.

2.94 Annual monitoring is conducted at four levels: module, programme, school and organisation. At module level, module teams reflect and report to the Programme Committee, which, in addition, considers feedback from students. Programme Leaders produce programme-level Annual Monitoring Reports on behalf of the Programme Committee, which are discussed and endorsed at the relevant School Board, and provide the reporting basis for the relationship with the awarding body. Higher National programme Annual Monitoring Reports are produced on an LSBF template.

2.95 At school level, a consolidated school Annual Monitoring Report template is completed, which is considered by the Quality Committee, following which an organisation-level Annual Monitoring Self-Assessment Report is produced, proposing actions for consideration at organisation level by the Academic Board. The Academic Board approves the associated Quality Enhancement Action Plan and Quality Improvement Plan. The annual monitoring process could also be used as a component of an enhancement framework.

2.96 The annual monitoring framework in theory allows the Expectation to be met. The review team evaluated the organisation's arrangements for annual monitoring by reading the Quality Handbook, Annual Monitoring Reports and action plans, and committee records, and through meetings with students, Programme Leaders, academic staff and senior managers.

2.97 The organisation is aware of its responsibilities to operate internal quality management processes to assure the quality of its Pearson Higher National provision (and potentially that of the SQA, in the future). Its mapping of alignment with the Quality Code, *Chapter B8* identifies the key instruments through which annual monitoring is conducted. The review team was able to trace the development of the Quality Handbook, which aims to provide an overarching approach to quality management with which pre-existing school procedures would align. Schools find the new organisation-level processes a significant improvement on the previous school-based arrangements. The Quality Handbook permits schools to develop differentiated procedures, but the team learned from senior staff that none had identified the need or yet chosen to do so.

2.98 While module and programme-level annual reports have been used within the organisation for several years, the production of school Annual Monitoring Reports and the Annual Monitoring Self-Assessment Report is a new innovation, and the review team was thus able to only follow one cycle of the new four-layered annual monitoring process.

2.99 Discussions with teaching staff confirmed that module reviews drew upon student feedback, using module evaluation questionnaires, and that Programme Leaders used the module reviews to inform their programme Annual Monitoring Reports. A comprehensive programme Annual Monitoring Report template guides the author, drawing upon comments

from external verifiers and student feedback to produce a Programme Action Plan. It was evident that programme teams reviewed their approach to delivery in order to improve engagement with students, and there was clear evidence of completing Programme Action Plans in a timely manner. However, in the samples made available to the review team, current Higher National reports lacked robust statistical data pertaining to student performance, progression and achievement. The Standards Verifier for HND Business and Finance also commented in 2014 that numbers of student records and registrations were confusing, being held separately both at delivery sites and centrally. The Standards Verifier for Art and Design also drew attention to high numbers of inactive learners. The lack of data and confusion at programme level is also reflected in the Annual Monitoring Report for the Vocational School (in which most of the Higher National students are enrolled); this Annual Monitoring Report contains no statistical data at all. See also Expectation B4 for further reflections on the organisation's management of student data.

2.100 School-level Annual Monitoring Reports are otherwise comprehensive and evaluative, addressing among other matters: follow-up on previous action plans; curriculum and standards; student recruitment and performance; student support and guidance; student engagement and feedback; learning resources; and staffing. While they reflect the diversity of provision and learning, all are well written, and are appropriately self-critical rather than congratulatory. They make reference to a range of sources of evidence (interim programme reports, Standards Verifiers' reports, module evaluation reports, committee meetings, partner feedback and reports, student feedback, and consultations with Programme Leaders) used in their production.

2.101 The Vocational School Annual Monitoring Report for 2013-14 also identifies the backlog of unmarked Higher National assignments referred to as 'legacy marking' (see Expectation B6), and notes the need to ensure that staff undertake development to ensure more consistent grading. It also reports that issues with student records have resulted in efforts to audit and cleanse data in order to ensure 'the timely registration, certification and withdrawal of students'.

2.102 The organisation-level Annual Monitoring Self-Assessment Report is considered at the Academic Board, with school Annual Monitoring Reports included for information. While developmental in tone, the Annual Monitoring Self-Assessment Report identifies aspects of the school reports that might be improved in future years. Of particular note, the Annual Monitoring Self-Assessment Report states that the Vocational School's HND programmes 'have been subjected to ongoing Pearson scrutiny for the majority of 2014 as a result of major admissions, staffing and assessment issues. Review and evaluation of assessment and internal verification processes have highlighted substantial issues including a substantial assessment backlog, lack of student feedback, poor-quality assessment feedback to students, and inadequate learning resources'. It intimated that the lower-level Annual Monitoring Reports did not reflect the concerns of Standards Verifiers, although the review team found evidence that the Academic Board itself had discussed the marking backlog in March 2014. Thus, it was evident that the legacy marking issue was well-known at senior level, and was supposedly being addressed, in March 2014, some six months before the writing of the school Annual Monitoring Report, in which the concerns raised by the Standards Verifiers had not been surfaced.

2.103 The Annual Monitoring Self-Assessment Report proposed the establishment of a Data Management Working Group to determine how to improve the integrity of student records and registrations with the awarding organisation, and the acceleration of the launch of a Quality Monitoring Annual Calendar, with formal key census dates for data collection to 'facilitate regular engagement with retention, progression and achievement data at programme and school level, contributing to the development of continuous programme monitoring'.

2.104 As it followed up QAA's Concern about delays in registering Higher National students with Pearson (see pages 4-5 and Expectation B4), the review team considered why the organisation's monitoring processes had not alerted it to the and enabled it to address the issues arising. The team found no direct reference to the registration issue in the organisation's monitoring reports. However, Standards Verifiers' reports, and Annual Monitoring Reports at school and organisation levels, had drawn attention to the related area of inaccurate student data.

2.105 The review team explored these matters with senior staff on four occasions. It heard in some detail of the measures that had recently been put in place to remedy the student record data system. The Data Management Working Group has yet to start its work in earnest, but will bring together both academic and service area stakeholders. It will receive regular quarterly updates of registrations and enrolments, with the aspiration of identifying variance well in advance of the annual academic monitoring process. The reluctance of staff to disclose data errors has been addressed; a number of senior appointments have been made to bolster the recruitment and data teams, and bring enhanced oversight to registration with the awarding organisation. In addition, FBT, as part of the organisation, has adopted a less aggressive approach to widening-participation recruitment of students, and the number of Programme Leaders has been increased to enable better oversight of the assessment process and student support. Additional staffing effort has been brought to bear in order to address the marking backlog.

2.106 The review team also heard that the organisation intended to extend annual monitoring to include service areas, a development that would augment current ad hoc unsolicited student feedback, and was likely to assist in unpicking the confusion between schools and central teams regarding the provision of accurate student data. Senior staff also described in detail the planned development of the Quality Monitoring Annual Calendar.

2.107 The review team concludes that the new four-layered process of annual monitoring shows promise, though it is still being embedded, and teething issues are noted above. It should be considerably enhanced as the embryonic Quality Monitoring Annual Calendar matures to give predictability and timeliness to procedures, and to the consideration of reports in committees. Evidence from the single monitoring cycle completed thus far demonstrates the ability of the organisation to be self-critical and evaluative. On this basis, the review team **affirms** the ongoing development of the annual monitoring process.

2.108 The review team also believes that the recent remedial actions to address the backlog of marking, and the various data and registration challenges, may bear fruit in due course. However, it considers that institutional oversight of these matters has been notably weak, and that as a result many Higher National students have been potentially disenfranchised from their awards or academic credit. The review team therefore **recommends** that the organisation (including FBT) ensure that internal quality assurance systems enable the Academic Board and senior managers to discharge consistently their responsibilities for academic oversight across all higher education provision.

2.109 In summary, the review team found that, while internal annual monitoring processes at FBT (as part at the organisation) have been improved, and may in due course pay dividends, timely and accurate monitoring processes are not yet in place to enable the organisation to systematically, effectively and consistently discharge its responsibilities for overseeing, assuring and enhancing the quality of learning opportunities. The review team concludes therefore that Expectation B8 is not met. The level of associated risk is moderate rather than serious, as the organisation is making appropriate progress in addressing some of the issues discussed above.

**Expectation: Not met**  
**Level of risk: Moderate**

**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**

2.110 Pearson requires students on Higher National programmes to lodge complaints through the organisation's own procedures.

2.111 The organisation's overarching Complaints Policy covers all schools and sites. The Policy outlines an appropriate set of principles, according to which the organisation operates its procedures. The organisation is committed to timely, fair and transparent processes that aim to resolve complaints informally where possible and feed issues into quality assurance mechanisms. The organisation seeks to resolve all complaints within 10 days (or three months, if formal procedures are invoked) and clearly distinguishes complaints from academic appeals. Students can receive assistance from the Student Liaison Officer or via their personal student liaison if studying online. Mediation and informal resolution are options throughout the process. At meetings, all parties in the dispute may be accompanied by a friend or non-legal representative.

2.112 The organisation (including FBT) operates a three-stage complaints procedure. First, a complaint may be raised informally with the module tutor, Student Liaison Officer or Programme Leader. The staff member concerned may raise the issue with senior staff and will normally acknowledge the complaint within 48 hours. Second, if the complaint remains unresolved, formal complaints can be submitted via a complaints form to a designated senior officer. Once received, the Complaints Officer can take a number of actions, including holding a meeting with a senior officer to clarify procedure, forwarding the complaint for local investigation and mediation, seeking the appointment of a senior investigating officer, or holding a formal hearing. Third, if the student does not consider the complaint resolved, an appeal stage can be invoked, which involves a review of the case by the Student Complaints Committee. There is provision to escalate cases to degree-awarding bodies, although the organisation does not subscribe to the Office of the Independent Adjudicator.

2.113 The organisation (including FBT) has a separate admissions complaints procedure, which outlines the scope of admissions complaints and relevant procedures. If they have concerns about an admissions decision, an applicant can refer to the matter of the Admissions Officer. If the applicant has new evidence, which may have a bearing on the decision, a decision review can be requested. The policy describes appropriate informal and formal stages, setting out the documentary requirements for the latter. If the Complaints Officer decides that a formal investigation is warranted, the head of the relevant school or the Academic Registrar carries out the investigation within 20 working days.

2.114 Responsibility for analysing complaints data, publicising procedures and reviewing the policy sits across the organisation's management, quality assurance systems and committee structures. The Academic Registry is responsible for raising awareness of the Complaints Policy and procedures. Programme Handbooks are required to include the complaints procedure. Within the Academic Registry, the Quality and Standards Officer monitors complaints dealt with at school level and ensures that appropriate records are kept. However, the review team heard that this monitoring function was in the process of being transferred to the Student Engagement Team. School Boards oversee the local management of complaints. Complaints data is monitored by the organisation-wide Academic Board and the Quality Committee, which considers trends and suggests

improvements to the reporting process. The organisation-wide Learning, Teaching and Assessment Committee also considers improvements to the Complaints Policy.

2.115 These frameworks in theory allow the organisation (including FBT) to meet this Expectation with regard to student complaints. To evaluate the operation of these policies and systems, the review team scrutinised anonymised complaints, the complaints log, Student Handbooks, and the organisation's intranet. The team also met teaching staff, senior management and students.

2.116 In 2013, the organisation sought external advice on strengthening its complaints procedures. This resulted in a series of Good Practice Forums and guides, as well as the development of a complaints log and trend analysis. Moreover, the organisation conducted an internal audit of its complaints procedures. This made detailed recommendations regarding the recording, categorisation and reporting of complaints. However, the changes suggested to the policy itself, while fairly minor, do not feature in the publically available document. The review team notes that the Strategic Institutional Enhancement Plan 2015-18 is incomplete with regard to actions taken regarding the recommendation to 'develop further, effective strategies and actions to minimise the incidence of student complaints across the institution'. Likewise, the draft Quality Monitoring Calendar mapping to the Quality Code does not contain events explicitly linked to complaints monitoring.

2.117 More specifically, the organisation explained that many complaints concerned its refund procedure. In response, it had appointed a Senior Operations Manager and introduced an online self-service refunds system alongside a shorter response time for refund appeals decisions. The organisation has also recognised that other aspects of its provision are subject to complaints, some of which tally with the issues raised through student surveys. These include poor communication about the programmes, poor attitudes on the part of administrative staff, low-quality teaching, and a lack of resources.

2.118 A register of complaints is periodically presented to the Academic Board and the Quality Committee. Schools are expected to analyse the number and nature of complaints in their Annual Monitoring Reports; but these Annual Monitoring Reports do not consistently report complaints data and actions taken. Although 58 complaints were logged in the Vocational School (organisation-wide) between October 2013 and May 2014, the 2013-14 Annual Monitoring Report recorded only a single complaint. The organisation's Annual Monitoring Self-Assessment Report 2013-14 considered the collated schools' analyses of complaints, but did not identify a lack of accurate reporting in Annual Monitoring Reports. The inconsistent reporting of complaints in Annual Monitoring Reports supports the recommendation made under Expectation B8.

2.119 The Complaints Policy and procedures are available to students, although not all students are aware of this. School-level handbooks outline the overarching complaints procedures and relevant contact details. Complaints policies are available on the schools' websites, VLE and in many programme-level handbooks. However, some Programme Handbooks, such as HND Hospitality, do not include the complaints procedure. The Quality Handbook signposts staff to a Complaints Policy intranet site.

2.120 The review team scrutinised anonymised complaints correspondence. The complaints department signposts students to support and outlines timelines for resolution. However, the investigation and response to complaints has not always followed established procedures. For example, senior staff members failed to outline a student's options for appeal and took no further action despite acknowledging errors in their investigation. Students have experienced delays in resolving complaints and poor communication with the organisation generally. Detailed analysis of the organisation-wide

complaints log revealed that complaints stretching back to 2013 were still pending. Unfortunately, the complaints log does not make a student's site of study easily accessible.

2.121 Despite reviewing its policies and procedures, the evidence supplied by the organisation demonstrated that complaints are not consistently handled in a fair or timely manner. The review team therefore **recommends** that the organisation, including FBT, ensure that complaints are investigated according to its procedures and in a manner that is timely and fair.

2.122 Students studying on Higher National programmes at FBT must utilise the organisation's internal procedures. Pearson requires each centre to have a centre policy on enquiries and appeals for Pearson qualifications and procedures in place to support the centre policy. Pearson advises centres that it is essential that the policy is communicated to staff and students. The Quality Committee is responsible for determining these internal appeals procedures and monitoring them.

2.123 The SED, the Complaints Policy, and a limited number of senior staff refer to an internal academic appeals procedure. However, the review team was unable to locate an organisation-wide internal academic appeals procedure. Despite the Quality Handbook mandating that Programme Handbooks include academic appeals procedures, none appear in student or Programme Handbooks within the scope of the review. The Quality Handbook provides a link to intranet information relating to the possible grounds for academic appeals and the procedures to be followed. However, when senior staff demonstrated the intranet to the team, the linked folder was empty and staff members were unable to locate an internal academic appeals policy. Moreover, while the Quality Handbook mandates that a programme file will include an academic appeals procedure and that Assessment and Exam Board chairs should be familiar with these procedures, teaching and senior staff were unaware of an internal appeals policy. During the review, the organisation provided LCCA-specific appeals procedures. However, while these procedures applied to some of FBT's Higher National provision, they were primarily concerned with appealing individual academic judgements and do not contain sufficient detail about the permissible grounds for appeal, a student's rights and responsibilities, or membership of decision-making panels to be used effectively. Nor are they published or referenced in school or programme-level handbooks. The organisation now states that it has no internal academic appeals procedures of its own; rather, it has adopted University of Wales policy as its residual procedures. The review team examined these procedures and found that they are outdated, do not reflect the structure of the organisation, and are not suitable, nor designed, for Higher National students wishing to appeal an assessment decision. As noted above, Pearson requires centres to have an appeals policy applicable to Higher National students and advise students that they 'cannot appeal to Pearson without first going through the appeals process of your centre'. While appeals heard by Pearson may not concern academic judgement of learner work, students should be able to launch and escalate appeals against a 'centre decision' that they consider to have disadvantaged them, particularly on grounds of whether a centre 'used procedures that were consistent with Pearson requirements' or 'applied the procedures properly and fairly in arriving at judgments'.

2.124 The lack of an appropriate internal appeals policy that covers Higher National provision and is readily available to staff and students means that Expectation B9 cannot be met, even in theory. The review team therefore **recommends** that the organisation, including FBT, develops, publishes, and consistently implements an academic appeals policy and procedures for students on Higher National programmes.

2.125 To evaluate the operation of the appeals systems and policies, the review team scrutinised school and Programme Handbooks, Annual Monitoring Reports, related quality

assurance documents, and the organisation's intranet. The team also met teaching staff, senior managers and students.

2.126 Students studying on university-validated programmes receive appropriate information about their degree-awarding body's academic appeals regulations. In the absence of an internal policy, the review team had difficulty testing the effectiveness of internal appeals procedures. Annual Monitoring Reports are expected to log the number and nature of academic appeals, although the examples provided did not record any. School and programme-level handbooks contain minimal information about academic appeals, merely stating that students should seek support from the administration team within 10 days of results being published. Students and staff are not aware of formal internal appeals procedures. Discussions with senior staff confirmed that administration staff had no knowledge of internal appeals procedures. Senior staff and teaching staff described working practices in the absence of a formal policy. These involve students informally consulting with their tutor about a grade, and staff do not have a clear understanding of the potential grounds for academic appeals. Moreover, the informal procedures described risk students being unable to escalate appeals independently of their tutor.

2.127 The review team found that, given the lack of an internal appeals policy requiring fair, accessible and timely appeals, Higher National students at FBT, as part of the organisation, are unable to launch academic appeals according to any defined procedures. Such students cannot challenge assessment decisions on well-defined grounds of appeal in a fair, accessible or timely manner. The team also found that the organisation's complaints procedures have failed to work effectively, and thus are unfair and inaccessible to students. For these reasons, the review team concludes that Expectation B9 is not met and the associated level of risk is serious.

**Expectation: Not met**  
**Level of risk: Serious**

**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**

2.128 FBT's current awarding partnerships are summarised on page 4 of this report. The organisation's Strategy Index offers a clear statement of intent in seeking out partners to work with. This applies to FBT as part of LSBF. There is no separate document outlining any collaborative provision strategy.

2.129 The organisation, including FBT, has been approved to deliver Higher National programmes leading to awards of the SQA (see page 4). It is not clear how far this development process has advanced: the review team variously heard or read that this project was yet to get underway; that it was at the pilot stage; and that the organisation was planning to recruit students to SQA awards in the following month.

2.130 Section 5 of the Quality Handbook refers to managing higher education with partners. It describes approval and re-approval processes (referencing the Quality Code, *Chapter B1*) in some detail. Later in the Quality Handbook there is a Partnerships Handbook. This refers to the Quality Code, *Chapter B10* and describes the nature and purposes of academic partnerships and a set of 'primary principles underpinning all academic partnerships'. The process for the approval of a partnership involves a comprehensive 'due diligence' questionnaire, advice from the Academic Planning and Development Committee, and sign-off by the Vice-Rector. There is a brief reference to monitoring partnerships in the Partnerships Handbook section of the Quality Handbook.

2.131 Work-based learning opportunities were available on Higher National courses. However, the review team learned that only one student was currently undertaking work-based learning. Moreover, many students are not aware of opportunities for work-based learning, or placements, or the careers support available.

2.132 Although there was a template for internship agreements in LCCA, and a basic guide for student interns, the review team was informed that the organisation has no formal written procedures, nor guidance for setting up, agreeing terms and conditions, or monitoring work-based learning placements. The review team therefore **recommends** that the organisation (including FBT) develop, publish and implement a policy and procedures for the management of work-based learning arrangements.

2.133 The review team concludes that Expectation B10 is met. However, given the significance of work-based learning in Higher National provision, and the absence of any formal procedures for the management of such provision, the associated level of risk remains moderate.

**Expectation: Met**  
**Level of risk: Moderate**

**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**

2.134 FBT does not offer research degrees, therefore this Expectation does not apply.

## The quality of student learning opportunities: Summary of findings

2.135 In reaching its judgement about the quality of student learning opportunities, the review team matched its findings to the criteria specified in Annex 2 of the published handbook.

2.136 Of the 10 applicable Expectations, five are met and five are not met. Of the five Expectations which are met, three have a low level of risk and two carry a moderate risk. Recommendations within these five sections, of which there are four, focus primarily on strengthening quality assurance, which is already broadly adequate.

2.137 Of the five Expectations which are not met, one has a moderate level of risk and four have serious and ongoing risks to the quality of student learning opportunities. Recommendations in these sections, of which there are eight, are focused on the Higher National provision at FBT as part of the organisation, and are intended to address significant gaps in policy, structure or procedure relating to quality assurance and the ineffective operation of parts of the organisation's governance structures. Moreover, the fact that many of the weaknesses identified by the review team remained in evidence at the time of the review visit demonstrated that the organisation's plans to improve the quality of its Higher National provision, including that at FBT, as part of the organisation, were inadequate.

2.138 There was one feature of good practice related to this judgement area and two affirmations.

2.139 The review team concludes that the quality of learning opportunities at FBT, as part of the organisation, **does not meet** 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 provision of information is a centrally managed service, operated from the organisation's head office in London, with overall responsibility for information resting with the Head of Brand and Marketing. Ensuring the accuracy of information is the ultimate responsibility of the relevant head of school or service area. The organisation has a detailed Public Information Policy, which is explicit in its intention to embed the Expectation of the Quality Code, Part C. The organisation publishes a detailed Student Handbook, and the review team saw full and detailed Programme Handbooks, which set out programme intended learning outcomes and assessment activities. Each student has access to a VLE, known as MyPage, which offers access to organisation-level and programme-specific information, and through which they can track their assessments and assessment feedback.

3.2 These frameworks allow the Expectation to be met. To determine whether FBT produces information that is fit for purpose, accessible and trustworthy, the review team scrutinised a range of documentation (both published in hard copy and via electronic media) made available to staff, prospective, current and former students, and other stakeholders.

3.3 In addition to its outward-facing websites, the organisation has a SharePoint system for staff, which, among other things, acts as a repository for its policies and procedures, and enables staff to track student achievement. The review team was not informed about the existence of this SharePoint site until the last stage of the review, at which point it was not able to gain free access to the site so that it could explore the nature of the documentation there and determine the status of the policies and procedures in use. The team was, however, offered a demonstration of the site, and found that it was a well-organised resource, which offered a good platform for the provision of regulations, policies, and procedures.

3.4 The review team noted a number of areas in which the organisation (including FBT) fell short of this Expectation. As noted under Expectation B9, the review team saw no evidence of an appeals policy suitable for its Higher National awards, despite the requirement by Pearson that it should have one. In some areas, the review team was left uncertain as to which was the definitive version of documentation presented: an example being the Quality Handbook, two undated versions of which were offered as evidence. There was, moreover, no shared understanding as to which document constituted the organisation's admissions and recruitment policy, with different meetings offering different explanations, and producing different versions of policies (see Expectation B2). However, the team recognised the work being undertaken to produce definitive policies and procedures.

3.5 At the time of the review, the list of partners on the organisation's website was not accurate, and, in particular, did not include the SQA, even though the organisation had approval to offer SQA programmes, and according to one source was planning to recruit students to SQA awards in the following month.

3.6 A further issue relates to the quality of the information provided to those students who were enrolled on Higher National programmes, but who had not been registered with Pearson as the awarding organisation. Here, the organisation confirmed that it had taken a decision not to inform students who had been affected by the block on registration, stating that it had been requested by Pearson not to do so (though the review team did not find direct documentary evidence of this request). In the light of this decision, the review team considered that the organisation is not meeting its obligation to provide all its current students with accessible and trustworthy information on which to make informed judgements about their programmes of study.

3.7 In the light of these considerations, the review team **recommends** that FBT, as part of the organisation, ensure that all published information about policies, programmes and academic partnerships is fit for purpose, accessible and trustworthy.

3.8 The review team found that the approach taken by the organisation, including FBT, for the provision of information about the organisation and its programmes is insufficient and does not consistently enable its intended audiences to form reliable views about the higher education that it offers. The review team concludes therefore that the Expectation is not met and the associated level of risk is moderate.

**Expectation: Not met**  
**Level of risk: Moderate**

## The quality of the information about learning opportunities: Summary of findings

3.9 In reaching its judgement about the quality of the information about learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

3.10 There is one Expectation in this judgement area, which is not met and considered to represent a moderate risk. There is also one recommendation, which relates to significant gaps in the procedures for assuring the fitness for purpose and trustworthiness of information. On this basis, the review team concludes that the quality of the information about learning opportunities at FBT, as part of the organisation, **requires improvement to meet** 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 SED comments on enhancement, although it is not clear from this document where, in the governance structure, the responsibility for a systematic approach to enhancement, driven and reviewed at organisation level, lies. The SED makes brief reference to deliberate steps taken at organisation level and to the 'strategic enhancement plan'. The SED commentary also highlights some instances of the identification of good practice from a number of sources. These include: the Learning, Teaching and Assessment Committee; the Student Council in LCCA; Programme Committees; and student surveys. However, the SED provided no evidence of a systematic approach to enhancement, driven and reviewed at organisation level.

4.2 The organisation cites the Quality Monitoring Calendar and the Quality Improvement and Development Action Plan as vehicles for enhancement. However, there is no indication within the documentation of how the former is used and which committees develop and monitor it. The latter does have specific tasks listed, with responsible officers, due dates and committee monitoring. There is also a Strategic Quality Improvement Action Plan and a Strategic Institutional Enhancement Plan, but these do not refer directly to a quality enhancement process as defined by the Expectation. The Academic Board's Terms of Reference make no mention of enhancement other than ratifying the Strategic Institutional Enhancement Plan. Minutes of Academic Board, drawn to the attention of the review team in this context, showed no evidence of how the Strategic Institutional Enhancement Plan is developed, nor how any specific aspects are implemented and subsequently monitored.

4.3 The Quality Committee mentions enhancement in its Terms of Reference. The Academic Planning and Development Committee (APAD) has no mention of enhancement in its Terms of Reference. The Terms of Reference for School and Departmental Boards have a passing mention of enhancement, but these may be subject to modification by individual schools. Programme Committees have, as one of their functions, to 'approve annual enhancement plan'. However, there is no reference to the production of this plan in the monitoring section of the Quality Handbook.

4.4 The review team asked about the organisation's approach to enhancement at a number of meetings with FBT staff at the review visit. The responses varied, with no indication of any agreed organisation-wide understanding of an approach. Various examples of instances where issues with student learning opportunities had been identified, through student feedback and other routes, and had been rectified were noted. In addition, some innovations in teaching, learning and assessment were cited. There is a Good Practice Forum that acts as a subgroup of the Learning, Teaching and Assessment Committee, where instances of good practice from all sites can be discussed. However, this group has no Terms of Reference or formal minutes; it acts solely as a discussion forum; there was no indication of how any of its initiatives are escalated to the more senior committees of the organisation. The review team found from these discussions, in which it was given widely differing interpretations of enhancement, many of them contradictory, that there is no common understanding of the enhancement process embedded within the organisation.

4.5 The review team asked for evidence of committees or groups where there would be evidence of deliberate steps being taken at organisation level to improve the quality of

student learning opportunities. Reference was made to Senior Management Team and Executive Chairman's Action Group meetings, and to the Board of Governors, Academic Board, APAD and Quality Committee.

4.6 Inspection of the Academic Board minutes provided found that there was no regular consideration of enhancement from an organisation-wide or strategic perspective. Apart from a note of the intention to set up a working group to look at quality assurance and quality enhancement, the only reference was from the Academic Board meeting of 25 September 2013: 'The next stage of enhancement is to establish a complaints enhancement system'. From scrutiny of the minutes of the APAD and ADAP Operations Group provided, it transpired that there was no regular consideration of enhancement from an organisation-wide or strategic perspective. Similar scrutiny of the minutes of the Board of Governors, Quality Committee, Senior Management Team, and Executive Chairman's Action Group made available revealed no evidence of a strategic approach, integration of activities in a systematic way or the development, implementation and monitoring of enhancement activities.

4.7 There have been a series of Quality Improvement and Enhancement Workshops Chaired by the Vice-Rector or the Head of Quality. Inspection of the minutes of these workshops show that, although an initial workshop discussed a definition of enhancement, most were involved with either mapping LSBF processes to the Quality Code or preparation for the QAA Higher Education Review.

4.8 The review team made extensive and repeated efforts to find evidence of deliberate steps being taken at organisation level to improve the quality of student learning opportunities. Although the team did not consider it necessary for the organisation to have a single documented enhancement strategy, it looked for explicit evidence of a strategic approach to enhancement, and of enhancement activities being developed and implemented, and reviewed, in a systematic and planned manner at organisation level. At meetings with staff, and through inspection of the documentation presented, no such evidence was found. In view of this fundamental lack of engagement with the Expectation for Enhancement, the review team **recommends** that the organisation (including FBT), revise its organisation-level approach to the enhancement of student learning opportunities in order to ensure that it is strategic, systematic and coherent; and embed this at all levels of the organisation.

4.9 Taking all these matters into consideration, the review team concludes that the Expectation for Enhancement is not met by FBT as part of the organisation, and there is a serious risk that students' interests will be jeopardised, as the organisation lacks a strategic approach that enables it to take deliberate steps at organisation level to improve the quality of student learning opportunities.

**Expectation: Not met**  
**Level of risk: Serious**

## The enhancement of student learning opportunities: Summary of findings

4.10 In reaching its judgement about the enhancement of student learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

4.11 There is one Expectation within this judgement area, which is not met with a serious level of risk. There is also one recommendation, which relates to significant gaps in the procedures for enhancing student learning opportunities. LSBF does not demonstrate a strategic approach, at organisation level, to the enhancement of student learning opportunities in a systematic and planned manner. There is no evidence of a consistently shared understanding of enhancement among staff.

4.12 The review team concludes, therefore, that the enhancement of student learning opportunities at FBT, as part of the organisation, **does not meet** UK expectations.

## 5 Commentary on the Theme: Student Employability

### Findings

5.1 FBT, as part of the organisation, is committed by the organisation's Strategy Index and Academic Signature to exposing students to the requirements of employment and entrepreneurship. The organisation has an Employability Strategy, which is assessed for effectiveness. The organisation has sought to draw out its strengths in this area by carrying out a systematic review of the employability aspects of its provision.

5.2 The Careers Service is highly regarded by many students across the organisation, although its impact has not been felt universally. Support staff help students develop their employability skills through advice, CV writing and interview workshops. These careers and welfare staff are embedded in school-level committees. A comprehensive Careers Handbook guides LCCA students through the academic cycle and highlights employability skill development opportunities. The Careers Service also offers students training and development programmes, one-to-one coaching, support via email, networking events, guest speakers, recruitment screening on behalf of employers, mock interviews and assessment centre preparation. The VLE system used across the organisation contains detailed advice on job-seeking, CV writing and interview techniques. The Careers Service also collects destinations data, sources internships, and involves itself in the development of employability within the curriculum.

5.3 There are opportunities for students to engage with relevant industries. For example, the Head of Careers has conducted a series of interviews with prominent CEOs and figures in public life, and a regular programme of visiting speakers on most programmes provides students with current industry insights. LCCA's broader Creative magazine is a good example of how students from different programmes and delivery sites can combine to gain valuable industry experience. Some programmes have organised site-visits. For example, students from Hospitality have visited hotels and tourism exhibitions. In Manchester, Hospitality students have received talks from Manchester City Council staff, and hotel and bar managers. Moreover, at Birmingham, Hospitality and Business students were involved in running a Café event to gain experience of customer service and daily operations.

5.4 Employability skills are embedded into many students' programmes. All HND Business students undertake a personal and professional development unit, and some choose to undertake work experience units, which are assessed through an internship report (signed-off by their manager), and a research piece on the industry. However, as discussed under Expectation B10, the organisation currently lacks formal procedures for establishing and monitoring the internships or projects it facilitates. Moreover, some students are not aware of opportunities for work-based learning or placements, or the careers support on offer. Some feel that this greater vocational focus was advertised as part of their programme.

5.5 The review team concludes that FBT, as part of the organisation, provides many of its students with opportunities to enhance their employability, but could extend these to cover all programmes equally effectively.

## 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 29-32 of the [Higher Education Review 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](http://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](http://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.

### 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.

### **Public information**

Information that is freely available to the public (sometimes referred to as being 'in the public domain').

### **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.

### **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.

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