Higher Education Review (Alternative Providers) of Kaplan International Colleges UK Ltd, Glasgow International College

February 2021

Contents

About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at Glasgow International College. The review took place from 16 to 18 February 2021 and was conducted by a team of five reviewers, as follows:

- Alison Jones
- Simeon London
- Professor Graham Romp
- Elizabeth Shackels
- Abraham Baldry (Student reviewer).

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

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

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

A check is also made on the provider's financial sustainability, management and governance (FSMG) with the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure.

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

The impact of COVID-19

As a result of the COVID-19 pandemic, the review of Glasgow International College was subject to an interim outcome in June 2020 and was concluded in February 2021. The review was conducted online and included meetings with the senior management team, academic and support staff and students. The scope of the evidence considered, and the nature of the judgements and operational milestones have remained the same but with some adjustments due to the online format and availability of students. A risk assessment was carried out prior to the review to identify and mitigate any potential risks. Annual monitoring will resume in 2021-22.

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[1] The UK Quality Code for Higher Education is published at: www.qaa.ac.uk/quality-code.
[2] QAA website: www.qaa.ac.uk
[3] Higher Education Review (Alternative Providers):
www.qaa.ac.uk/reviewing-higher-education/types-of-review/higher-education-review

Key findings

Judgements

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

- The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations **meets** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.

Good practice

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

- The appointment of the Learning Advisor to provide individual and personal academic and pastoral support to students on a regular basis.(Q9)

Recommendations

The QAA review team makes the following **recommendations**.

By September 2021:

- It is **advisable** that all Glasgow International College takes steps to further promote the Kaplan UK Pathways E-Safety Policy to ensure students are aware of its requirements. (Q4)

About the provider

Kaplan International Pathways is part of Kaplan International, which is in turn part of Kaplan, Inc, and a subsidiary of Graham Holdings Company (formerly known as the Washington Post Company). Kaplan annually provides education and career services to approximately one million students in more than 100 countries worldwide.

Glasgow International College (GIC; the College) offers a range of programmes at Foundation Certificate and Pre-Master's levels. Subject areas include Arts and Humanities; Science and Engineering; Law and Social Sciences; Business, Economics and Finance; and Medical, Veterinary and Life Sciences.

Programmes are specifically designed in collaboration with the host university to prepare international students to succeed in UK higher education.

GIC's primary relationship is with the University of Glasgow (U of G). Kaplan Pathways has existing partnerships in the UK with the University of Brighton, Bournemouth University, the University of Liverpool, Nottingham Trent University, the University of the West of England, Bristol, the University of Essex, and the University of Nottingham, where it operates embedded colleges on each of the campuses. Kaplan also operates the University of York International Pathway College in partnership with the University of York. This is located on the University of York campus and forms part of the University of York's registration with the Office for Students.

Additionally, Kaplan Pathways operates a further college in London which links to more than one partner university. Kaplan International College London (KICL), provides pathways into Aston University, the University of Birmingham, the University of Bristol, City University of London, Cranfield University, Queen Mary University of London, University of Westminster and the University of York.

On successful completion of their studies at the required academic and English exit levels, students have a guaranteed offer of progression upon meeting the requirements of entry to an undergraduate or postgraduate degree at the host/partner university - the University of Glasgow. Students who obtain the Kaplan Pathways Award, but who fail to meet the conditions of their offer for progression to U of G, are able to access alternative offers through Kaplan's University Placement Service (UPS). This acts as a safety net for those students who fail to progress to their first-choice UK higher education institution and provides ongoing student support and guidance throughout their pathway programme studies.

Student numbers at GIC have increased year-on-year, with an increase from 874 students in 2017-18 to 1175 in 2018-19.In academic year 2019-20, there were 1654 enrolments. Academic attainment has increased year-on-year - in 2019-20 there was a 96% pass rate, with 95% of students starting their programme reaching the level to be able to progress to their degree programme at the University of Glasgow. There are 33 full-time and 114 part-time academic staff, with 16 full-time and two part-time non-academic staff.

Key recommendations emerging from the annual programme reports (APR) are recorded in each college's Programme Action Plan and may be taken forward to the College Action Plan. A recommendation of the 2018-19 pre-master's for Arts and Humanities APR was to provide students with different types of assessment beyond the traditional combination of essay and exam. The new module introduced in September 2019 for students on this programme - Philosophy, History and Culture - includes an assessed seminar discussion as one of the components in addition to more traditional essays.

Explanation of findings

This section explains the review findings in greater detail.

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

Core practice (S1): The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks.

Findings

1.1   The monitoring of quality and standards is undertaken by the partnership's Joint Academic Management Board (JAMB). Joint Academic Management Boards (JAMBs) are normally convened between the College and the partner university and allow a joint review of academic standards. A senior academic at the University chairs the board. Kaplan has established links with relevant personnel at each of their partner higher education institutions. The benefit of this is that it allows for channels of communication to be developed and supports the maintenance of standards through the exchange of appropriate information and data that can be communicated internally to the Senior Management Team (SMT) and College Executive.

1.2   To ensure that the threshold standards for qualifications are consistent with the national qualifications framework, external reference points appear to be used to good effect. Relevant policies and procedures as outlined in the Quality Assurance Framework (QAF) and Academic Standards and Quality Manual (ASQM), support the promotion of academic regulations and assessment frameworks which include the limits for awarding credit and the credits required to achieve the Kaplan Pathways Award. The standards are a particularly important reference point when mapping programmes to partner university programmes for progression purposes. GIC has a range of structures in place to ensure that threshold academic standards are consistent with the national qualification frameworks. The institution has a Quality Assurance Framework (QAF), and an Academic Standards and Quality Manual. The design meets expected requirements.

1.3   The Kaplan Pathways Award is a qualification awarded by Kaplan International Pathways. The award is currently aligned with different external reference points, including the Regulated Qualifications Framework (RQF), the *Scottish Credit and Qualifications Framework* (SCQF) and the Common European Framework of Reference for Language (CEFR). Kaplan International Pathway Awards are recognised for entry purposes by host/partner universities to programmes aligned to *The Framework for Higher Education Qualifications* (FHEQ) under the terms of a cooperation agreement. Agreements follow a common format but vary according to individual arrangements.

1.4   For GIC there are a number of foundation certificate programmes which are in line with Level 7 of the SCQF due to students progressing on to the second year of a degree programme. These standards are a particularly important reference point when mapping programmes to partner university programmes for progression purposes.

1.5   Other external reference points include the appointment of external examiners and the standards expressed in the CEFR: Learning, Teaching, Assessment. The Higher Education Academy (HEA) - now Advance HE, the UK Council for International Student

Affairs (UKCISA) and the Joint Information System Committee (JISC) are also referred to for additional enhancement. Kaplan International Pathways has active membership and representation at events run by a number of these bodies.

1.6   Approval of course documentation including programme specifications, are another important reference point in managing student learning opportunities. Kaplan Pathways programmes are designed to ensure the successful transition of students from college to university. Programme specifications provide important information for students on the learning opportunities given to them and how they will be supported and assessed. Programme and module specifications describe the learning outcomes and the means by which these are delivered and assessed. Specifications act as summary documents but more detailed information, elaborating the programme or module syllabus, can be found in module information pages on the virtual learning environment (VLE). Learning outcomes are aligned to the appropriate level as part of the Kaplan Pathways Qualifications Framework. Programmes are developed in line with appropriate QAA Subject Benchmark Statements. Each of the programmes is designed to meet different student needs.

1.7   External examiners are appointed by the College with relevant checks made to ensure subject coverage and no conflicts of interest for the relevant higher education institution. External examiners are responsible for the monitoring, scrutinising and reviewing of student work; they provide confirmation that threshold standards are consistent with the relevant national qualifications frameworks and credit is only awarded where threshold standards have been met. They work closely with staff throughout the academic year.

1.8   The review team tested the expectation by meeting staff and students, and pursuing desk-based analysis of a wide range of documentation detailing arrangements. The Programme Committee has overall responsibility for developing effective programme assessment strategy. Kaplan's Centre for Learning Innovation and Quality (CLIQ) advises GIC on assessment. A Quality Calendar provides a checklist for quality assurance items that must be conducted throughout the academic year, identifying staff responsible for actioning these items. The Quality Assurance Framework and the Academic Standards Quality Manual are updated annually, with key guidance and supporting forms updated during the year.

1.9   The CLIQ produces the Kaplan Assessment Development Guide, providing staff with extensive guidance on the ethos and practice of programme development. The Assessment Development Guide references the Quality Code and is guided by its principles. Assessments are designed to ensure good alignment, validity, reliability, effects, practicality, and academic standards. This process uses standardised templates which refer to learning outcomes, skills developed, teaching approaches, assessment points, and a wide range of appropriate external benchmarks including RQF levels, Common European Framework of Reference for Languages (CEFR) Levels, and QAA Subject Benchmark Statements. Programme specifications reference threshold standards. Grade descriptors are used to inform the academic performance students must attain in order to successfully pass modules and programmes. Additionally, staff developing assessments are pointed to a range of external resources on the development and use of different types of assessment. The curriculum development process includes appropriate points for external review.

1.10   There is a parallel process for curriculum updates, including measures to ensure a single point of reference once implemented. Proposals for new products, programmes and/or modules are reviewed by New Product Development and Approval Group (NPDAG) or the Business Approval Group for Programme Development (BAGPD) committee in the first instance, and APQC in the second. Students' requirements for academic progression are available on the VLE and, on graduation, students are issued with transcripts which reference FHEQ frameworks. The Academic Standards Quality of Programmes (ASQP)

report is considered by the Academic Planning and Quality Committee (APQC), enabling systematic monitoring of academic standards.

Core practice: Met
Level of risk: Low

Core practice (S2): The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers.

Findings

1.11   GIC ensures that academic standards beyond the threshold level are reasonably comparable with those achieved in other UK providers. The team tested the expectation by meeting staff and students, and pursuing desk-based analysis of a wide range of documentation detailing arrangements. The extensive range of regulations, processes, templates and documents outlined in (S1) result in a robust framework for developing and maintaining standards which enable students the opportunity to achieve standards beyond merely threshold levels.

1.12   Learning outcomes are specified for each course, consistent with the relevant national qualification frameworks' descriptors, and assessment determines whether each student has achieved them. GIC operates processes to ensure consistency of learning outcomes with the requirements of relevant national qualifications frameworks. They make appropriate use of external examiners. Students met by the team demonstrated understanding of what is required to achieve higher grades and attain standards beyond the threshold. Academic staff met by the team clearly understand and apply approaches to setting and maintaining appropriate academic standards which is confirmed by the external examination process and the university to which GIC students progress. Representation of students' achievement which exceeds the baseline is reasonably consistent with other British providers.

Core practice: Met
Level of risk: Low

Core practice (S3): Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

Findings

1.13   Glasgow International College offer a range of programmes at foundation certificate and pre-master's levels. Subject areas include: Arts and Humanities; Science and Engineering; Law and Social Sciences; Business, Economics and Finance; and Medical, Veterinary and Life Sciences. Programmes are specifically designed in collaboration with the host/partner university to prepare international students to succeed in UK higher education. Depending on their entry level of English, students join programmes for a variety of durations, and study modules appropriate for the individual student and to their university progression requirements. On successful completion of their studies at the required

academic and English exit levels, students have a guaranteed offer of progression upon meeting the requirements of entry to an undergraduate or postgraduate degree at the relevant host/partner university. Students who obtain the Kaplan Pathways Award, but who fail to meet the conditions of their offer for progression to the host/partner university, are able to access alternative offers through Kaplan's University Placement Service (UPS).

Core practice: Met
Level of risk: Low

Core practice (S4): The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.

Findings

1.14   GIC uses external examiners for all award bearing programmes, as well as English for Academic Purposes - a key module for the College. External examiners (EE) receive an induction when they begin at GIC. EEs review samples of assessed work, course and module specifications, teaching and learning methods, marking documents and student-facing assessment information, to complete a report for the GIC to ensure that academic standards are set at appropriate levels. EEs confirm that GIC has clear and comprehensive assessment regulations which ensure that assessment is fair, reliable and transparent. There is an optional reporting mechanism to escalate serious concerns to staff. EE feedback is addressed in annual programme reports. Students met by the team confirmed that assessment and clarification processes are reliable, fair and transparent. EEs attend GIC to provide additional guidance for teaching staff and managers. More broadly, joint review of academic standards is conducted by the Joint Academic Monitoring Board (JAMB) with the University of Glasgow. This Board has an appropriate remit. The monitoring process is ongoing with reports produced annually by the Programme Committee. These annual programme reports (APRs) are considered by the JAMB and can lead to curriculum enhancement. Module Monitoring Reports (MMRs) are submitted annually to the University.

Core practice: Met
Level of risk: Low

Common practice (Standards 1): The provider reviews its Core practices for standards regularly and uses the outcomes to drive improvement and enhancement.

Findings

1.15   GIC has an annual programme report for each programme. End-of-Cycle Panels meet every five weeks to make sure students are on track. Programme committees monitor programmes and modules to assure the maintenance of academic standards, and receive annual programme reports and EE reports. EEs provide feedback on programmes and are updated on changes made to programmes. 'Quality calendars' act as a checklist of quality assurance that needs to be completed throughout the year.

Common practice: Met
Level of risk: Low

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

1.16   The review team concludes that the setting and the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies at the provider meets UK expectations.

2 Judgement: The quality of student learning opportunities

Core practice (Q1): The provider has a reliable, fair and inclusive admissions system.

Findings

2.1   Student recruitment and admissions processes are well defined and managed centrally by Kaplan International Pathways, supported by a network of overseas recruitment offices and agents, with overall responsibility sitting with the Director of Admissions. Responsibility for the training of Admissions teams sits with the Admissions Senior Management team who provide induction and ongoing training and development to ensure applications are processed transparently and in accordance with the current guidelines and legislation. Applicant engagement and support during the process is extensive. Students met by the team reported that the process was clear and fairly managed. Information for applicants is provided through a variety of routes, including the website, from agents and from the admissions team directly, with a range of additional course and university resources available to support making an informed decision.

2.2   The team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation. Academic and English language entry requirements for pathway courses vary by college. Details of English language requirements are clearly stated in the prospectus and on the website, with guidance to additional study that might be required for those with lower IELTS scores. Students beginning their programmes after 23 March 2020 are subject to the Home Office *Covid-19: Guidance for student sponsors, migrants and short-term students -* temporary concessions in response to COVID-19 with regard to which English language assessments may be used to determine a student's English language ability on entry.

2.3   A range of internal and external benchmarks for previous study, such as internal entry requirements English language qualifications are employed to ensure individual applicants' educational experience satisfy entry requirements.

2.4   Access to support for all students is clearly defined within admissions documentation, the Kaplan International Pathways website and their online adviser service, with additional resources and pastoral support available to students aged 16 and 17. Students with additional learning or support needs are encouraged to declare them throughout the application process and are signposted to the appropriate teams/resources where necessary. Applications considered to be non-standard or those deemed 'high risk' are assessed, evaluated and scrutinised to ensure suitability for enrolment.

2.5   Successful applicants and their parents are provided with extensive guidance to help them prepare for study. Terms and conditions for study are clearly defined. Prospectuses and website pages are written in collaboration with the university partner and key internal stakeholders. All public information is appropriately scrutinised and approved at key stages in accordance with the providers' quality assurance procedures to ensure congruency and consistency, with final approval sitting with the Managing Director.

2.6   Additional support has been introduced in light of COVID-19 to enable students to effectively orientate to their course of study and prepare for their online learning experience. Changes introduced to teaching and learning in light of the COVID-19 pandemic are clearly

communicated to prospective students through the College website.

Core practice: Met
Level of risk: Low

Core practice (Q2): The provider designs and/or delivers high-quality courses.

Findings

2.7   Two groups oversee programme design. New Product Development and Approvals Group (NPDAG) reviews products and programmes that have not been brought to market yet. Business Approval Group for Programme Developments (BAGPD) approves modifications to products and programmes already running. The Academic Planning and Quality Committee (APQC) approves programme and module specifications, and has an appropriate membership.

2.8   GIC's approach to delivering a high-quality academic experience is achieved through the Kaplan International (KI) Pathway Learning and Teaching Framework which informs and defines the shape and functions of the learning environment. It is the primary reference framework for learning and teaching opportunities undertaken within GIC. The framework is used effectively by the College as a reference point for setting context-specific learning and teaching actions in the College Action Plan. The team tested the expectation by meeting staff and students and pursuing desk-based analysis of a wide range of documentation detailing arrangements. Senior academics provide feedback on new programmes. APQC reports to UK Pathways College Executive Management Board (CEMB). Programme specifications have a common template providing definitive information, and consistently reference relevant national qualifications frameworks, learning outcomes, approaches, skills and assessment strategy.

2.9   Module specifications outline learning outcomes, academic literacies, and a range of relevant information. Each programme delivered has a Programme Committee which monitors the quality of student learning opportunities, reporting to the senior management team. Feedback from external examiners and the University of Glasgow is used to inform course design, and there is a standard template for introducing changes to curricula.

Core practice: Met
Level of risk: Low

Core practice (Q3): The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience.

Findings

2.10   All permanent and sessional staff are employed by Kaplan International Pathways. The GIC Organogram outlines the staffing structure of GIC. Staff are recruited from a variety of backgrounds, including higher and further education and the English language teaching sector, many of whom are qualified to PhD level. Induction for staff new to GIC includes an overview of Kaplan Pathways and GIC, together with specific module induction sessions for new tutors. Mentoring is also used to support staff in specific roles. Staff are also supported by GIC to gain the Advance HE award.

2.11　The specific target within the Technology Enhanced Learning (TEL) Strategy ensures development of staff competences and engagement with learning technologies to enhance students' teaching and learning experience. Staff are encouraged to embed technology into their classroom practices including free applications, VLE activities and software. In January 2020, as part of the college restructure, one of the Academic Managers took responsibility for TEL and established TEL coordinator responsibilities to train and support staff in the use of new classroom technology and teaching tools as outlined in the College Action Plan.

2.12　The team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation. GIC staff receive college or role specific training and development from Kaplan International Pathways, webinars and online modules from CLIQ or through the College's own continuing professional development (CPD) activities. CLIQ also provided additional CPD activities to support staff in the roll out of the revised Pathways 2019 curriculum. Students met by the team commented very positively about how knowledgeable and helpful the staff were.

2.13　A resources-sharing section on Kaplan Sharing Space provides CPD digital literacy support which includes contributions from other colleges, research tools for the classroom, TEL apps, a wellbeing and resilience section, and a collaborative calendar for sharing events, webinars and conferences to staff across the network. The tutor-led GIC Away Day provides CPD sessions, in addition to a wide range of CPD TEL activities that include the use of interactive screens in classrooms, flipped learning, active learning, writing for digital content and the use of rapid authoring tool for digital content creation. Staff have opportunities to attend the University's Learning and Teaching Conference, as well as other national and international conferences. Staff met by the team stated that they felt well-supported by GIC and Kaplan International in their professional development and by the partner university.

2.14　Training or development needs may be identified within staff performance appraisal and the Evaluative and Peer Observation of Learning and Teaching also enables opportunity for professional developmental activities to be identified. Staff confirmed their engagement with online teaching observations during online delivery that included peer observations to share good practice.

Core practice: Met
Level of risk:　Low

Core practice (Q4): The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience.

Findings

2.15　The design and approval of new programmes requires full consideration of all aspects of the learning opportunities to be provided, including consideration of student support and learning resources. The Joint Academic Management Board has responsibility for approving new programmes for progression, takes an overview and approves the pathways offered at GIC. A centralised storage and tracking system for programme specifications is held on the central intranet - KI Connect - that ensures version control and security of all documents. GIC ensures provision of computing and library facilities, digital resources and specialist facilities either within the college itself or through access to facilities at the University of Glasgow. GIC students are Associate University Students which

allows them to access all university facilities, including online resources, which supports transition.

2.16   The team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation. A review of the physical and virtual learning environments at the College was being undertaken to reflect Kaplan's vision for a more student-centred approach to learning. New software and tools had been integrated into the College's VLE which include the online software package 'Rise' - to support flipped learning and teaching approaches, and Mahara - an e-portfolio platform that enables the use of multimedia such as images, journals and videos for use in assessment submissions where appropriate. New touchscreen displays have also been introduced to enhance the digital learning environment at the College. Students confirmed they had good access to learning resources through GIC's VLE, including next year's learning materials, and GIC staff were available to resolve any technical issues. While they confirmed GIC had offered innovative approaches to learning during the pandemic, their preference was for face-to-face teaching.

2.17   GIC has responsibility for ensuring the safety and accessibility of its physical and learning environments which are communicated to staff and students, with support from Kaplan's Health and Safety manager. Kaplan's E-Safety Policy has been adopted, based on the JISC template. GIC had updated its E-Safety Policy in light of the pandemic, although students who met the review team were unaware of GIC's safety requirements in the online learning environment regarding security, privacy and use of social media. The College is advised to take steps to further promote the UK Pathways E-Safety Policy to ensure all students are made aware of its requirements.

2.18   The Student Services team provides a range of pastoral and personal support, advice and guidance to students and acts as a point of referral for students who require more specialist support and for those with protected characteristics. Admissions staff with responsibility for students with additional needs refer students who have declared a disability or medical condition to the College Services Manager for follow-up. Student access to information on the College's services is available through the VLE, which includes details on Learning Advisor support. Student attendance is closely monitored by the college and by the central Compliance Team, reporting to the CEMB, with progression support provided by the college administrative team and the central University Placement Service Team. GIC also contacts the University to ensure ongoing support for individual students on progression. Learning Advisors provide a high-level of personalised support to students with specific needs, working closely with the central team. The Student Experience Survey elicits feedback on the learning experience including access to resources, which is generally positive, and students met by the team commented positively about resources. This information is used to inform future developments.

Core practice: Met
Level of risk: Low

Core practice (Q5): The provider actively engages students, individually and collectively, in the quality of their educational experience.

Findings

2.19   Students at GIC are encouraged to provide feedback on their learning experience. Mechanisms include focus groups, staff and student forums, use of student representatives on programme committees (PCs), directly to senior management, feedback boxes, and

email surveys and questionnaires. PCs meet termly, are convened by the Programme Leader and include student representatives from each programme.

2.20   The mechanisms used to engage students in the quality of their educational experience reflect appropriately, the nature of the student population, including their initial level of competency in English, and the fact that for many students their time at GIC may be as short as two terms. GIC encourages effective student engagement before commencement of their studies by sending each student a welcome email, relevant contact information and granting access to relevant areas of the VLE. These mechanisms allow this expectation to be met and the team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation.

2.21   Student representatives at GIC receive training through several sessions with the academic team and Student Voice Co-ordinator, as well as a series of training sessions on areas such as eliciting feedback from their peers and the purpose of student representation. Student forums are organised prior to programme committees to allow student representatives to discuss non-academic issues prior to the meetings themselves. Programme committee meetings are minuted and are an effective mechanism to feed back to students any steps or action taken to address previous points raised. Students met by the team expressed satisfaction with their engagement with GIC in their academic and non-academic experience.

2.22   Student feedback is reviewed and acted upon as and when received and through the APR. A summary of the Student Experience Survey feedback is considered by the CEMB to review performance. It is acknowledged that an area of development could be the involvement of students more in monitoring and influencing the curriculum. It is acknowledged that a further area for improvement across all colleges is to consider the engagement of students with staff on evidence-based discussions regarding student performance and student satisfaction.

Core practice: Met
Level of risk: Low

Core practice (Q6): The provider has fair and transparent procedures for handling complaints and appeals which are accessible to all students.

Findings

2.23   The ASQM details the procedures for handling academic appeals and complaints and it is GIC's responsibility to ensure these are communicated with students and shared on the VLE. There is an online process for applicants to make a complaint if they are dissatisfied with the outcome or their experience of the admissions process. Any such complaints are monitored by the Senior Admissions team and reviews the admissions process annually in the light of complaints made to identify possible refinements and improvements.

2.24   Students have access to formal and informal complaint procedures if they wish to complain about the delivery and quality of learning opportunities. Informal complaints may be expressed with a Learning Advisor or any other member of staff to find an early resolution. Where the student is unable to resolve any issue through informal discussions, they can complete an online Student Complaint Form. Formal complaints are initially considered by the Head of College Services where a response is expected to be provided within five working days. If the complaint is not resolved at that stage, the student can

request the College Director to appoint another person to carry out a second independent investigation. If the complaint remains unresolved the student may put their concerns in writing to the Chief Operating Officer. As QAA still provides educational oversight for Glasgow International College, this college is not eligible to register with the Office of the Independent Adjudicator (OIA). Outcomes of formal complaints are to be stored in a written log which is then reviewed on an annual basis by the College SMT and at each CEMB, to assess any trends or issues, with an executive review from the UK Pathways SMT.

2.25   GIC students may submit an academic appeal normally within three working days from the date of Assessment Board results being published and communicated by submitting an Academic Appeals Form along with supporting evidence. An academic leader (or equivalent), in consultation with the Learning and Teaching Director or their nominee, will undertake the initial investigation of formal appeals. This will result in either an informal resolution or an Academic Appeals Panel will be convened to formally consider the claim. These policies and procedures allow this expectation to be met and the team tested their effectiveness by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation.

2.26   The information on how to complain is available to students in various places, including the Kaplan website and the VLE, and is introduced as part of student Welcome Week. GIC students met by the review team, were aware of the complaints and appeals procedure which were clear and accessible to student on the VLE but none had used the procedures. There is a clear process to deal with feedback and any complaints from rejected applicants. At the time of the review, GIC had received no formal complaints within the academic year 2020-21.

Core practice: Met
Level of risk: Low

Core practice (Q7): Where the provider offers research degrees, it delivers these in appropriate and supportive research environments.

Findings

2.27   GIC does not offer research degrees.

Core practice (Q8): Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the academic experience is high-quality irrespective of where or how courses are delivered and who delivers them.

Findings

2.28   GIC provides programmes to facilitate progression to undergraduate and postgraduate programmes primarily at the University of Glasgow with students who do not meet the criteria having the option to progress to other institutions through the provider's University Placement Service. No delivery is undertaken by other institutions.

Core practice: Met
Level of risk: Low

Core practice (Q9): The provider supports all students to achieve successful academic and professional outcomes.

Findings

2.29   Students are provided with clear and concise information embedded within the admissions process that supports their preparation for study, actively engages students in the preparation process and signposting them to additional support and resources where necessary. Students receive a 'pre-arrival guide' to prepare them for departure to the UK which contains a range of useful information. Video calls are offered to all students prior to arrival. Student induction is thorough, with specific course, resource and learning support sessions scheduled for all, as well as the opportunity for students to interact socially. Provision has shifted online in response to the COVID-19 pandemic.

2.30   There are guidelines for creating alternative means of assessment for students with disabilities, who are given student support plans. The University of Glasgow advises GIC on needs assessment for students with disabilities. GIC students are permitted to access counselling from the University. GIC have been proactive in offering mental health first aid training and suicide prevention training to staff. Students met by the team stated that feedback is useful and timely.

2.31   Educational, pastoral and social support is provided through a range of mechanisms that can be tailored to meet individual student needs where necessary, overseen by the student services team. Students under 18 years of age have a weekly 'check-in' meeting with a member of the College Services team.

2.32   Learning Advisors provide opportunities for students to routinely receive support and academic guidance as well as signposting to additional services. Meetings take place in a timely fashion and are tailored towards the needs of the students. Additional support is offered through the College Student Services. Support offered by academic tutors includes pastoral support, and students described Learning Advisors as helpful. The appointment of the Learning Advisor to provide individual and personal academic support to students on a regular basis is identified as a feature of **good practice**. Students met by the team stated that they felt well-supported to achieve successful outcomes.

2.33   The KapPACK e-Portfolio provides students with the opportunity to demonstrate knowledge, skills, confidence and graduate attributes necessary for success in higher education. Students are provided with academic skills training embedded in modules and digital literacy skills are embedded across the curriculum. Staff recruitment is targeted to the specific needs of each programme. Induction encompasses all aspects of Kaplan Pathways with additional opportunities for non-academic staff. Staff development is centred on Kaplan's staff development framework, with additional activities within individual colleges and through partner universities. The promotion, monitoring and development of the quality of learning opportunities is the responsibility of the Programme Committee, supported by the CLIQ and guided by the QAF and ASQM. Student attendance and progress is closely monitored and reported on Self Evaluation Document reports that SMT receives on attendance reports. More recently, this has been enhanced through the use of online learning analytics enabled by remote learning.

2.34   The College has made a suite of changes to provision in light of COVID-19. Provision has shifted online. The induction programme has been updated to include information on the use of virtual classrooms and pre-recorded lectures. Drop-in sessions for students are run online.

2.35   End-of-Cycle Panels meet every five weeks to review a range of formative and summative evidence. Progress and attendance reports are shared with parents, sponsors and agents. Student satisfaction is generally high, and most students progress to study at the partner institution.

Core practice: Met
Level of risk: Low

Common practice (1): The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement.

Findings

2.36   The QAF and the Academic Standards and Quality Manual (ASQM) set out the guiding principles and processes by which the academic standards are assured, and the quality of all programmes are enhanced. Updates to this framework and these regulations are made annually upon agreement and sign-off from the Director of Innovative Student Learning following feedback from colleges. Associated guidance notes and templates are updated throughout the year. A Quality Calendar is in use, detailing the key operational and academic monitoring and review processes that the College needs to follow. Monitoring and review processes are evaluated as part of annual reviews of the ASQM.

2.37   The APQC is responsible for academic standards and quality and is the most senior academic body of Kaplan International Pathways. The APQC, chaired by the Director of Innovative Student Learning in CLIQ, establishes, monitors and reviews academic standards and quality through policies, procedures and mechanisms in accordance with the QAF. Final internal academic decisions on the approval of new programmes, modules and significant modifications to existing programmes and modules rest with the APQC. APQC has the responsibility to review all proposed new assessment types and ensure they adhere to the principles set out in the ASQM.

2.38   At provider level, CLIQ plays a key role in quality assurance and quality enhancement and acts as a 'hub' within the network of colleges to ensure a common Kaplan International Pathways identity and set of standards, and also to initiate and/or support the development of new programmes and practices. On behalf of Kaplan International Pathways, CLIQ provides a central oversight of colleges and programmes while supporting colleges in the implementation of their quality assurance and enhancement processes.

2.39   At college level, programme committees (PC) are established to promote, develop and monitor the quality of student learning opportunities and the delivery and enhancement of learning and teaching on programmes. These committees report to the college SMT and involve student representation. Each programme has an appointed external examiner (EE), who specifically provides feedback on the programme and provide insights with regard to programme improvements and developments, bringing a wider perspective. EE's views are considered when colleges are proposing changes to programmes, modules or assessments. The Curriculum Change Proposal document has an explicit section that includes external review.

2.40   The monitoring and review of programmes is undertaken to ensure threshold standards are met, primarily through the PC. Monitoring and review occurs on an ongoing basis, and also on an annual basis. The Academic Leader, in conjunction with the PC, is responsible for drafting an APR. The report considers the relevant performance and feedback data. It also focuses on drawing attention to matters of particular note, good practice or issues arising, and identifying actions to resolve these matters. Students are

involved in programme monitoring and review in formal and informal ways. Students formally contribute to monitoring by completing feedback at specific points during their learning journey. Teaching staff contribute to programme monitoring in a variety of ways. All staff are able to provide feedback by completing end of module surveys. This feedback is considered and, where appropriate, summarised in the APR and is therefore received and discussed by the programme committee. PCs comprise staff other than teaching staff and therefore a wider representation of staff is able to contribute to monitoring and review.

2.41   Outcomes of programme monitoring and review are dealt with at both central and college level. The Kaplan International Pathways SMT has, within its terms of reference, the remit to review and monitor performance which includes reviewing programme operation within colleges. At a college level, APRs are a key tool with which to ensure the appropriateness of learning opportunities. Feedback from staff, students and EEs are to be considered within the APR process. GIC also submits regular module monitoring reports to the University. Key recommendations emerging from the APRs are recorded in each college's Programme Action Plan and may be taken forward to the College Action Plan. Subject moderators provide information on the current modules at the University and ensure that learning outcomes are met at the correct level and that marking practices are in line with academic regulations. This is monitored via module monitoring reports that are submitted to the JAMB.

2.42   Kaplan Pathways colleges are required to undertake a Periodic Programme Review (PPR), normally every five years. There was a systematic review of the curriculum during 2016 and 2017, initiated by CLIQ but actively led by college Learning and Teaching Directors (or equivalent), which considered feedback including from stakeholders throughout Kaplan International Pathways, host/partner universities, students and external representatives. Where periodic reviews are conducted by the partner university as part of the agreed quality assurance arrangements, this will be accepted by Kaplan International Pathways as fulfilling the requirements of the QAF and will therefore avoid unnecessary duplication of effort.

2.43   There is strategic oversight for programme development at Kaplan International Pathways SMT level, that is, provider level. At college level GIC makes effective use of key management information such as student performance and student feedback in its management of academic standards and quality. The data used to inform its decision making includes student marks profiles and student feedback; feedback from external stakeholders such as parents, agents and sponsors; retention and withdrawal statistics; attendance patterns; use of the VLE; and feedback from external examiners and external reviews.

2.44   Annual programme reports and module monitoring reports analyse modular performance and are considered at programme committees. The Combined Exit report provides a high-level overview of student performance for the Senior Management group and the wider network.

2.45   College action plans are developed to shape strategy and ensure that students receive high-quality teaching and learning. These plans are reviewed and updated by colleges on a regular basis. The Head of Quality Assurance and Enhancement regularly monitors College action plans, providing colleges and management groups with feedback, noting positive 'good practice' points as well as areas for development.

2.46   GIC works closely with the University and data are shared on the longer-term performance of students during their degree studies. Degree performance and completion data are collected and analysed, as well as information about enrolments and withdrawals. Subject moderators from the University of Glasgow are consulted regarding changes to

modules and programmes in order to provide feedback on how proposed changes would help to prepare the students for the transition to studying at the University. Subject moderators also advise on assessment strategy so that where students progress on to higher levels of an undergraduate degree at the University, they are prepared for the assessment strategies used there.

2.47   It is acknowledged by the GIC that an area for development is further sharing of best practice between colleges regarding the inclusive design of assessments and further scale-up of digitisation of assessment where it is appropriate and adds value to student learning. These processes allow the Common practice to be met and the team tested their effectiveness by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation.

Common practice: Met
Level of risk: Low

Common practice (2): The provider's approach to managing quality takes account of external expertise.

Findings

2.48   Responsibility for the use of external expertise in maintaining academic standards is shared between GIC and the University. Programme design, approval and modification draws on external expertise across a range of levels to ensure new programmes align to relevant external benchmarks and partner university requirements. External reference points are cited in all programme specification documents.

2.49   The team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation. External examiners are appointed to each award bearing programme with flexibility of appointment dependent on the needs of the programme and expertise of the examiner. Kaplan explicitly set out the role and responsibilities for external examiners within its Quality Assurance Framework. Appointments are independently approved by the Joint Academic Board.

2.50   Induction is managed by the Programme Leader with additional external training offered electronically for those new to the role. Staff and students are oriented to the EE's role at induction and can access relevant policies through their VLE, along with final EE's reports. Reports follow a comprehensive template that provide opportunity to comment and make recommendations on the relevant aspects of academic standards and assessment. EE feedback and annual reports inform annual review at a module and programme level and are ultimately included in the Academic Standards Quality of Programmes report.

Common practice: Met
Level of risk: Low

Common practice (3): The provider engages students individually and collectively in the development, assurance and enhancement of the quality of their educational experience.

Findings

2.51   GIC integrates a broad range of formal and informal mechanisms for student feedback - including focus groups, formal staff and student forums, use of student

representatives on PCs, student representatives' feedback to senior management, feedback boxes, and email surveys and questionnaires - to develop, assure and enhance the quality of the student educational experience from pre-enrolment through to the end of their programme of study. Feedback informs a diverse range of quality assurance measures, including specific key performance indicators (KPIs).

2.52   The team tested the expectation by meeting with staff and students and pursuing desk-based analysis of a wide range of documentation. Students are orientated to feedback opportunities at induction and throughout their course of study. Engagement with feedback opportunities is specified within the Student Code of Conduct. Formal feedback is scheduled against the quality calendar and detailed within the Quality Assurance Framework.

2.53   Formal feedback informs annual programme and college reports that are reviewed and scrutinised at the programme, provider and partner level on an annual basis. Annual Student Experience Survey feedback is considered by the College Executive Management Board to review performance. The Chief Operating Officer reports on the performance to UK Kaplan Pathways SMT.

2.54   Colleges provide feedback to students formally and informally. Student representatives attend programme committee and student forum meetings where they are able to voice concerns and comments. Training, support and mentoring is provided for student representatives. Feedback on action in response to student input is shared through a range of routes, including annual reports, programme committee meetings and through a 'You Said We Did' noticeboard. Students report that the College is responsive to their views. Kaplan has undertaken additional monitoring of student experience in light of changes to teaching, learning and assessment introduced in response to the COVID-19 pandemic.

Common practice: Met
Level of risk: Low

The quality of student learning opportunities: Summary of findings

2.55   GIC has established a number of committees to promote effective oversight of its academic standards. The highest management body of Kaplan International Pathways is the Senior Management Team (SMT), which is responsible for the company's strategic direction. The SMT is supported by the College Executive Management Board (CEMB) whose membership includes Directors of all Kaplan Pathways Colleges.

2.56   Kaplan International Pathways' senior academic body is the Academic Planning and Quality Committee (APQC) which is responsible for the governance of academic standards and quality. Senior Management Teams or Groups at college level follow a common term of reference, although the exact details may vary across colleges. The College Director has accountability for all academic and operational aspects of the college. Partnership arrangements between Kaplan, GIC and the University rests with the Joint Strategic Management Board and Joint Academic Management Board (JAMB).

2.57   GIC produces an Annual College Report (ACR) that includes a summary of all aspects of the overall performance of the college and the partnership. Although the report includes data on student numbers and student performance, the focus is a review of the overall pathway partnership between Kaplan International Pathways and the University. College action plans are used to shape future strategy and ensure that students receive

high-quality teaching and learning. There is a working group formed to review the plan holistically and update in line with developments, which is then progressed by the Senior Management Team.

2.58   The monitoring of quality standards is undertaken by the JAMBs which are convened between the college and the partner university and allow a joint review of academic standards. A senior academic at the university chairs the board. Kaplan has established effective links with personnel at each of their partner higher education institutions that allows for channels of communication to be developed. It also promotes an exchange of appropriate information and data which can be communicated internally to SMT and College Executive. The Academic Standards Quality Programme (ASQP) Reports are considered by the Academic Planning and Quality Committee (APQC). This allows for systematic monitoring of academic standards and student performance data at a Kaplan Pathways level.

2.59   Quality Calendars have been established by each college and act as a simple checklist against the QAF and ASQM of quality assurance items that need to be completed during the year - as a way of clearly identifying what processes are due when and who should take responsibility to implement and check completion. In the academic year 2019-20, the college's use of this tool is actively monitored and supported via a shared space and is a standing agenda item at monthly Academic Management Group calls.

2.60   In 2019, Kaplan Pathways has devised its own bespoke student management system called Kaplan Student System (KSS). This continues to be developed. KPIs are used to good effect to monitor student performance. These are considered in the APRs and is a feature of the ASQP report and the Periodic Programme Review (PPR) process. To overcome the impact of GDPR, Kaplan Pathways has introduced a common data capture template which has been issued to all partners to request data on academic outcomes for former Kaplan students.

2.61   GIC regularly reviews student performance in a number of ways. For example, End-of-Cycle Panels run after every five-week cycle to ensure that students are on track for progression and, if not, to make suitable interventions. Annual programme reports and module monitoring reports compile modular performance and are taken to programme committees for discussion. Finally, the Combined Exit report provides a high-level overview of student performance for the Senior Management Group and the wider network.

2.62   GIC considers the involvement of external examiners (EE) and reviewers a crucial component of Kaplan International Pathways' quality management process and assures internal and external stakeholders that learning opportunities remain appropriate, and that threshold academic standards are met. EE and reviewer feedback inform the APRs and is included within the ASQP report.

2.63   EEs are appointed according to the agreed arrangement with the host/partner university. Some partner universities act as a critical friend during the appointment process. Where approval is necessary, the JAMB undertakes this role. At GIC, EEs participate annually in a full day at the college to provide guidance to teaching and support teams as well as managers. This visit focuses on checking the procedures around exam scripts rather than meeting with students.

2.64   EE reports are made available to students in several ways. Usually this will be through the VLE, and some colleges, such as at GIC, also share external examiner feedback and actions taken via a 'they said, we did' noticeboard.

2.65   Following the initial COVID-19 lockdown, the College Senior Management Team introduced a number of actions to support and safeguard both staff and students. These

included an Outbreak Management Plan, various staff guidance documents, surveys such as their student digital learning survey and updating their E-Safety Policy with the move from face-to-face to an online digital approach to learning and teaching.

2.66   The review team concludes that the quality of student learning opportunities at the provider **meets** UK expectations.

Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 20-22 of the Higher Education Review (Alternative Providers) handbook.

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

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

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

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

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

Common practices
Practices included in the UK Quality Code that will be applied by providers in line with their missions, their regulatory context and the needs of their students. These are practices common to the underpinning of quality in all UK providers but are not regulatory requirements for providers in England (registered with the Office for Students).

Core practices
Practices included in the UK Quality Code that must be demonstrated by all UK higher education providers as part of assuring their standards and quality.

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.

Expectations
Statements in the **Quality Code** which clearly and succinctly express the outcomes providers should achieve in setting and maintaining the standards of their awards, and for managing the quality of their provision.

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

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

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

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

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

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

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

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

Programme (of study)
An approved course of study that provides a coherent learning experience and normally leads to a qualification.

Programme specifications
Published statements about the intended **learning outcomes** of programmes of study, containing information about teaching and learning methods, support and assessment methods, and how individual units relate to levels of achievement.

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

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

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

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

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

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

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

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