Higher Education Review (Alternative Providers) of Inter-Ed UK trading as The City College

November 2018

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 Inter-Ed UK trading as The City College (the College). The review took place from 19 to 21 November 2018 and was conducted by a team of three reviewers, as follows:

- Mrs Jane Durant
- Mr Steve Evans
- Miss Leigh Spanner.

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

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

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

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

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

Judgements

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

- The maintenance of the academic standards of the awards offered on behalf of its awarding organisations and the setting and maintenance of the academic standards of the awards offered by Inter-Ed UK t/a The City College **does not meet** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities **meets** UK expectations.
- The enhancement of student learning opportunities **requires improvement to meet** UK expectations.

Recommendations

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

By April 2019:

- further develop and formalise procedures for the design, development and approval of programmes (Expectation B1)
- ensure that the college's Recruitment and Admissions Policy and its Admissions Appeals Procedure are made available to all applicants on its websites (Expectation B2)
- ensure that limitations on physical access to the College's premises are published on its websites (Expectation B2)
- establish a systematic approach at a senior level to the development, monitoring and oversight of the College's action plans (Expectation B8)
- further develop, formalise and consistently implement a process for the management of information to ensure that all information continues to be fit for purpose, accessible and trustworthy (Expectation C: Information and Expectation A2.2).

By July 2019:

- ensure that the programmes in the City College of Acupuncture continue to be positioned at the relevant level of the FHEQ (Expectations A1 and A2.2)
- revise the academic framework and regulations, and implement them in order to ensure secure institutional oversight of quality of learning opportunities and academic standards (Expectations A2.1, A3.4, B1, B2, B3, B5 and B8)
- establish and implement secure arrangements for the management and oversight of work placements (Expectation B10)
- develop and implement a strategic approach to the enhancement of learning opportunities (Enhancement).

About the provider

Inter-Ed UK, using its trading name of The City College (the College), is a privately-owned college offering higher education programmes intended to serve the needs of the community in London where it is based. It is committed to widening access to higher education for all potential students and to minimising or removing barriers that may exclude them from higher education.

The College offers full-time programmes leading to the award of Higher National Diplomas (HND) in Business Management, in Hospitality Management, in Travel and Tourism Management and in Health and Social Care Management. In addition, the College offers the part-time level 5 BTEC Diploma in Education and Training (DET), which enables entry to the teaching profession. The College's awarding organisation for its HND programmes is Pearson.

The City College of Acupuncture (the CCA) forms part of the College, but is separately branded to reflect the specialist nature of its provision. The programmes offered within the CCA are non-regulated and comprise a full-time Professional Licentiate in Acupuncture and a part-time Licentiate in Tui Na. The CCA programmes lead to an award from the College itself and are accredited by the British Acupuncture Accreditation Board (BAAB).

In 2017-18 the College enrolled 351 students on its HND programmes, nine students on the DET programme and 42 on its CCA programmes. Of its total of 402 students, 385 are full-time and 17 are part-time. The College employs 40 academic staff, three of whom are full-time and the remainder are part-time.

Major changes since the previous Higher Education Review (Alternative Providers) (HER (AP)) in 2015 include the appointment of a new Principal, who has been in post since 2017, the introduction of the DET programme in in 2016, and the introduction of programmes based on the Regulated Qualification Framework (RQF): from September 2018, all of the College's programmes, other than those in the CCA, followed the RQF.

The major challenge identified by the College is in raising the levels of attendance, retention and achievement of its students. The College recognises the need to enrol students with sufficient motivation, commitment and skills to successfully complete their programme, and has been developing a number of strategies to achieve this.

The College's most recent engagement with the QAA was a monitoring visit in 2017 which was extended to incorporate a concerns investigation. The outcome of the visit was a judgement that the College was making progress with implementing the actions identified in the 2015 HER (AP), but that further progress was required. The concerns investigation gave rise to a number of recommendations; the College's action plan in response to these recommendations shows that all of them have been completed.

Explanation of findings

This section explains the review findings in greater detail.

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

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

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

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

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

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

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

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

Findings

1.1   The College currently offers a range of programmes comprising BTEC HNDs in Business Management, Hospitality Management, Travel and Tourism Management, and Health and Social Care Management; a BTEC Diploma in Educational and Training, and Licentiates in Acupuncture and Tui Na (Chinese Medical Massage). The licentiates are, for branding purposes, delivered through The City College of Acupuncture (CCA).

1.2   The HNDs are offered through arrangements with Pearson as the awarding organisation. The College itself is the awarding organisation for the Licentiates.

1.3   For the HND programmes Pearson is responsible for the setting of threshold standards together with clear and transparent learning outcomes. Pearson also ensures that each qualification which the College offers is set at an appropriate level in relation to the FHEQ and appoints external examiners to ensure academic standards are being maintained.

1.4   Under its agreement with Pearson, the College is responsible for the delivery of the programmes and for the assessment of students. The College is also responsible for student recruitment and support, and for ensuring that programme delivery is adequately resourced. For Pearson programmes, the College maintains academic standards by implementing Pearson's quality procedures.

1.5   The College is responsible for all academic matters in relation to the Acupuncture Licentiates. There are no specific Subject Benchmark Statements relating to these programmes, but the College affirms that they are in accordance with the requirements of BAAB, which obliges accredited programmes to be at honours degree level, aligned to level 6 of the FHEQ.

1.6   The College's arrangements would, if securely implemented, allow this Expectation to be met.

1.7   In considering this Expectation the review team considered the records of approval from Pearson and from BAAB, along with relevant elements of the quality assurance documentation, including BAAB specification and requirements, examples of Programme Specifications, BAAB Accreditation Report, and annual monitoring. The team also met senior staff and academic staff of the College.

1.8   Staff of the College affirmed that academic standards are set and managed by compliance with and reliance upon the quality procedures of both Pearson and BAAB. In respect of the latter, in making its own awards, the College confirmed alignment with BAAB requirements, as confirmed also by the Accreditation Report and reports from the external examiners. The Pearson Annual Management Reviews also confirm that the HND programmes are conducted in accordance with Pearson's requirements.

1.9   Senior staff described the steps which the College has taken to assure alignment of its Licentiate programmes to the relevant level of the FHEQ. The alignment of the programmes with the FHEQ was assured at the time of their approval by BAAB. The review team found, through examination of programme and module specifications along with external examiner reports and the report of the BAAB accreditation visit, that the College understands its responsibilities for ensuring that its Licentiate programmes are aligned to the relevant level of the FHEQ. The team noted the College's reliance on the knowledge and expertise of teaching staff and on advice from external examiners in making judgements about this alignment. However, the team formed the view that this reliance is insufficiently rigorous to enable secure judgements: the College's quality assurance procedures do not include a formalised process for using the views of teaching staff and of external examiners to inform decisions about whether changes to Licentiate programmes are needed in order to ensure continuing alignment to the FHEQ. As described in Expectation A2.2, the College lacks satisfactory reference points for ensuring that the programmes remain aligned following any subsequent changes, such as a record of how the FHEQ was used to inform programme design and development prior to BAAB approval and of the features of the programme, which particularly ensures alignment with the FHEQ. The College appeared to have only limited understanding of the need to establish a secure process for maintaining this alignment. The team **recommends** that the College ensures that the programmes in the City College of Acupuncture continue to be positioned at the relevant level of the FHEQ.

1.10   The College's programmes meet the requirements of the FHEQ, as assured by the College's arrangements with Pearson and BAAB. Therefore, the Expectation is met. The lack of a formalised process to ensure the continuing alignment of CCA programmes with the relevant level of the FHEQ indicates a weakness in the operation of the academic governance structure and insufficient emphasis to assuring standards in the College's planning processes. The associated level of risk is moderate.

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

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

1.11   Pearson's academic frameworks and regulations govern the academic standards of its awards. The College asserts that the Academic Board has overall responsibility for ensuring that the College adheres to Pearson's policies and regulations. There is a separate Academic Board for the CCA programmes, which reports directly to the College's Academic Board.

1.12   Programme handbooks make appropriate reference to the relevant regulations. These handbooks are located on the College's virtual learning environment (VLE) and are accessible by students.

1.13   The College has full responsibility for the Licentiates in Acupuncture and Tui Na and has developed an Academic Framework and Regulations for them, as in the Student Handbooks for those programmes. BAAB also expresses confidence that the Licentiate programmes are being delivered and assessed in accordance with its requirements.

1.14   The College's arrangements would, if securely implemented, allow this Expectation to be met.

1.15   The review team tested this Expectation by examining relevant quality policies and procedures of the College covering the key deliberative committees and boards along with their terms of reference, and minutes of relevant meetings including Assessment Boards. In addition, the team met with senior and academic staff, and students.

1.16   In considering the College's structure for academic governance, the review team identified a number of shortcomings in the terms of reference and operation of the Academic Board, the Senior Leadership Team (SLT) and the CCA Academic Board. These shortcomings relate to overlaps and inconsistencies in the terms of reference of committees, lack of clarity in lines of reporting, lack of external membership in any senior committees, and lack of effective oversight of quality assurance processes.

1.17   Although the College regards its Academic Board as the ultimate decision-making body for all academic matters, the terms of reference of the SLT indicate that the latter fulfils a number of key academic functions as well as exercising responsibility for the overall strategic direction of the College as well as for its educational character and mission. Their terms of reference indicate a two-way relationship between the SLT and Academic Board but the nature of the relationship lacks clarity due to overlap in functions between the two as expressed in their terms of reference, and to inconsistencies in supporting College documentation. Examples of overlap in terms of reference include responsibility for the approval of new programmes, for approval of policies, for approval of action plans recommended by assessment/exam boards, and for quality improvement and enhancement.

1.18   The lines of reporting indicated in the Deliberative Meeting and Reporting Structure show that the CCA Academic Board reports to the College's Academic Board, and this was confirmed by the College's Managing Director. However, the terms of reference of the CCA Academic Board make no reference to its reporting to the College's Academic Board, and

instead contain several references to reporting to the SLT. The review team concludes that arrangements for oversight of the work of the CCA Academic Board are not well understood within the College.

1.19   There is significant overlap in the membership of the SLT and the College's Academic Board, with the Principal, Director of Studies, Director of Student Records and Programme Leaders sitting on both bodies. This, coupled with the duplication of some functions, contributes to the lack of clarity in responsibilities for oversight of standards at the senior level.

1.20   The Academic Board's terms of reference require it to meet at least three times per year. However, the Board met only twice in the academic year 2016-17 and only once in the year 2017-18. Although its terms of reference do not specify a quorum, its meeting in March 2017 took place with only three members present from a membership of at least eight. The review team considered that it was unlikely that the Board could effectively carry out its responsibilities in the absence of the Director of Student Records, Programme Leaders and a Senior Lecturer.

1.21   There is only limited evidence of effective academic oversight of the College's procedures for quality assurance in meetings of the Academic Board. The minutes of meetings of the Academic Board in 2016-17 and in 2017-18 do not reflect the level of scrutiny and consideration of issues that may be reasonably anticipated within this body. For example, oversight of the annual monitoring process at the meeting in December 2017 is recorded in a minute which confirms only that the process had been completed and that reports had been discussed in Programme Team meetings, but which fails to indicate an effective level of scrutiny or oversight of the outcomes of the process by the Board itself. As a further instance, the Board did not consider student feedback, either from focus groups or from student evaluations, in the course of 2017-18. A discussion with senior staff failed to lead to the identification of examples of the Board exercising its oversight of annual monitoring. While the team heard from senior staff that the Academic Board has overall responsibility for monitoring, maintenance and approval of academic standards and that the SLT feeds into the Board, this is inconsistent with the terms of reference of the SLT and of the Board, and is not reflected in the minutes of the SLT.

1.22   The shortcomings in academic governance indicate a committee structure at a senior level which is ineffective in the maintenance of academic standards and oversight of the quality of learning opportunities, and indicate that the College has only limited understanding of its responsibilities for ensuring effective oversight of academic standards. The College's framework for governance is not supported by any supplementary documentation setting out its quality assurance processes in a consistent and comprehensive manner for the benefit of members of staff who use those processes. The review team formed the view that the staff of the College have not recognised the ineffectiveness of the College's governance structure. The team **recommends** that the College should revise the academic framework and regulations and implement them in order to ensure secure institutional oversight of quality of learning opportunities and academic standards.

1.23   The College's academic governance framework operates ineffectively in its oversight of the College's arrangements for quality assurance. As a consequence, there has been ineffective oversight of aspects of the College's activity, including of arrangements for programme approval, for recruitment, selection and admission policies and procedures, for the provision of learning opportunities and teaching practices, for student representation at all levels, and for programme monitoring and review, as described in Expectations B1, B2, B3, B5 and B8. The Expectation is not met and the level of associated risk is serious.

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

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

1.24   The College maintains a definitive record of all of its programmes in the form of programme specifications. The College developed programme specifications for CCA programmes during the programme approval process in 2012. For HND and Diploma programmes, Pearson issues approved specifications outlining what the College must deliver and what students must achieve. The College adapts these specifications to include additional information about the aspects of the programme it approves, such as the choice of units offered and entry criteria.

1.25   Specifications detail programme and unit learning outcomes, content, teaching and assessment methods and reference FHEQ levels. They are accessible to staff and students in handbooks and on the College's intranet as a central reference point for the delivery and management of programmes.

1.26   The College's arrangements would, if securely implemented, allow this Expectation to be met.

1.27   To test their operation the review team scrutinised a range of documentation, including published programme and unit information, and documents relating to annual monitoring and assessment. The team also held meetings with senior staff, teaching staff, professional support staff and students.

1.28   On the whole, the review team found programme specifications to be sufficiently detailed to serve as an effective reference point for programme delivery, assessment, monitoring and review. However, there are only limited records which demonstrate that programmes offered by CCA are aligned to the FHEQ levels cited within programme specifications. The College does not, therefore, have a satisfactory reference point for ensuring subsequent changes to programmes remain at the appropriate level: this shortcoming supports the recommendation in Expectation A1 regarding the positioning of CCA programmes at the relevant level of the FHEQ.

1.29   The review team confirmed that the College uses programme specifications as a reference point at various stages during programme delivery and assessment. Teaching staff reference the learning outcomes found in programme specifications when creating schemes of work and lesson plans. Teaching staff also create assignment briefs with assessment criteria that align with learning outcomes. The College internally verifies assignment briefs to ensure they meet requirements set out in programme specifications.

1.30   The College ensures that students receive certification for their awards, specifying the credit and level achieved on completed modules. Certificates are provided by Pearson in respect of HND and Diploma programmes, and by the College itself for CCA programmes.

1.31   Although students and staff can access the full specifications for each programme on the College's intranet, the review team found inconsistencies in the way that specifications are communicated to students through handbooks. HND and Diploma

students have full details of programme and unit specifications in course-specific handbooks. For CCA students, module-specific information is contained in Module Learning Guides but overall programme specification information, including programme learning outcomes and grade classification thresholds, is not communicated through handbooks. This lack of consistency supports the recommendation in Expectation C regarding a process for the management of information.

1.32　　The College's arrangements ensure that there is appropriate maintenance and use of definitive documentation. The Expectation is met and the associated level of risk is low.

Expectation:　Met
Level of risk:　Low

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

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

Findings

1.33   Pearson maintains ultimate responsibility for monitoring and ensuring that academic standards for its programmes delivered at the College are fully aligned to national standards. The processes for programme and module design and approval to ensure that academic standards are set at a level that meets the UK threshold standards for these qualifications rest with Pearson. In accordance with Pearson's requirements, the College holds responsibility for selecting optional units, programme delivery, writing and grading assessments to ensure coverage of prescribed learning outcomes.

1.34   Following approval by BAAB, the College is responsible for setting and upholding academic and quality standards for the CCA programmes. Responsibility for the oversight and monitoring of academic standards on the CCA programmes rests with BAAB and is undertaken through the Board's annual monitoring processes.

1.35   The College has not designed and developed any new programmes for about five years. It does not have a fully developed formal system for the internal approval of programmes and their constituent modules that demonstrates an understanding of the requirements of the FHEQ and the ability to meet UK threshold academic standards. However, the recently introduced programme planning checklist is a mechanism through which proposed changes to existing programmes or suggestions for the introduction of new programmes are recorded and submitted to the Principal for approval.

1.36   The process for the approval of programmes to be delivered by Pearson, and the plans to further develop the use of the programme planning mechanism would enable the Expectation to be met.

1.37   The review team tested the Expectation by scrutinising documentation including the centre approval documentation from Pearson and BAAB and the checklists of the College's responsibilities to operate and deliver programmes. In addition, the team considered programme specifications and held meetings with senior and academic staff.

1.38   The approval processes and monitoring by Pearson and BAAB provide assurance that academic standards are set at an appropriate level and that programmes align with the awarding organisations' academic regulatory requirements.

1.39   Staff of the College described a process led by programme leaders to ensure the identification of resources for the changeover from the Qualifications and Credit Framework to the Regulated Qualifications Framework in 2018. This process does not include demonstration of alignment to the UK threshold standards nor of how the introduction of a programme will align to the College's business and curriculum planning processes. However, the programme planning checklist, as used in preparation for converting HND programmes from the Qualifications and Credit Framework to the Regulated Qualifications Framework, requires staff to consider numerous aspects of programmes including the identification of actions required to complete the process.

1.40   Pearson and the BAAB have primary responsibility for ensuring that standards are met when programmes are approved or changed, and they monitor the College to ensure that it meets its required responsibilities. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

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

Findings

1.41   Pearson sets the academic standards including learning outcomes, assessment strategies and regulations for its awards, thus assurance is given that external benchmarks are met. Accreditation by BAAB for the CCA programmes provides confirmation of alignment with national standards. The College's suite of policies and procedures governing assessment are applied across all programmes.

1.42   Pearson is responsible for checking the achievement of learning outcomes and alignment with national standards through the recruitment of external examiners and their reporting arrangements. The College appoints an external examiner to undertake similar functions for the CCA programmes. The College sets assessments for all the programmes it delivers. Internal verification and moderation processes are used to ensure that assessment briefs are fit for purpose prior to issue, and that students' achievements are aligned to national standards.

1.43   The implementation of the College's and Pearson's regulations, and the operation of external examiners' expertise in setting and maintaining academic standards would enable the Expectation to be met.

1.44   In testing this Expectation, the review team examined a range of documentary evidence, including awarding organisation approval and responsibility checklists, external examiner reports, programme handbooks, programme specifications, policies and procedures. The team also met senior and academic staff.

1.45   The College provides comprehensive and clear guidance to staff with responsibility for assessment. This includes the Assessment Policy, which is aligned to the Quality Code and to Pearson's requirements, the Academic Conduct and Practice Procedure, the internal verification system, the programme of assessment boards and arrangements for external examination. This regulatory framework accommodates the requirements for the achievement of learning outcomes, assessment, and verification for both Pearson and the CCA programmes.

1.46   The College operates within its academic framework. Pearson provides programme specifications containing explicit reference to the FHEQ, which staff customise for student handbooks. The review team heard that steps taken to ensure that the specifications for the CCA programmes align with national standards include modelling aims and outcomes as used by other accredited providers, staff members' expertise in their work as external examiners, the external examining system and the periodic review undertaken by BAAB. Programme handbooks contain details of unit learning outcomes, while marking and grading descriptors for assessment are included in assessment briefs. Staff at the College are familiar with these requirements and apply procedures appropriately.

1.47   Similarly, the College's arrangements for the assurance and confirmation of assessment decisions and the award of credit align with Pearson and BAAB requirements. Assessments for the Pearson programmes are first marked and verified by programme teams. Assessments for the CCA programmes are first and second marked by College staff, with the requirement for discussion and referral to the external examiner in the event of a discrepancy in marks of more than five per cent. External examiners consider a sample of assessment decisions during annual visits. Teachers attend assessment boards the outcomes from which are checked during external examiners' visits and the annual review processes of Pearson and BAAB.

1.48   In conjunction with Pearson and BAAB, the College has systems in place to ensure that the award of credit and qualifications is made when achievement of learning outcomes is demonstrated through assessment. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.49   The monitoring and review of courses and the achievement of academic standards is the shared responsibility of the College, Pearson and BAAB. The policies and procedures which the College is required to follow are articulated in Pearson manuals and College documents. The College is responsible for annual programme monitoring. Pearson undertakes annual Academic Management Review and external examiners' visits to ensure that UK threshold academic standards are met and that the College aligns with monitoring and review requirements. BAAB reviews standards on the CCA programmes through the annual monitoring audit process which the College completes.

1.50   The College produces programme monitoring reports for the Pearson programmes. Annual monitoring audit and module reviews are completed for the CCA programmes. These are produced according to the College's programme monitoring procedure. Programme Team meetings held each month provide academic staff with a platform for ongoing review.

1.51   Managed by the College, a cycle of periodic programme review supplements the annual monitoring processes. The review team were advised that responsibility for the oversight of internal monitoring and periodic review is assigned to the College's Academic Board. However, there is no explicit reference to this within the Board's terms of reference, although there is reference to monitoring, measuring and evaluating in the terms of reference of the SLT.

1.52   The processes for monitoring and reviewing programmes to ensure that UK threshold academic standards are met would, if securely implemented, allow the Expectation to be met.

1.53   In testing this Expectation, the review team scrutinised awarding organisation regulations and approval documentation, minutes of committee meetings, reports for programme monitoring and periodic review, and held meetings with senior staff, teaching staff and professional support staff.

1.54   The College follows its requirements for the production of reports for annual programme monitoring and periodic review. Programme monitoring reports are structured to align with Pearson and BAAB requirements. Those for HND programmes align with the Quality Code. Those for the CCA programmes include module reports and copies of minutes from the CCA's Academic Board. The cycle of internal periodic programme review was introduced as HND programmes converted to the Regulated Qualifications Framework. Records indicate that the previous delays in establishing and completing this cycle have now been addressed.

1.55   Both Pearson and BAAB undertake annual monitoring of programmes, through which they evaluate programme delivery and assessment against the learning objectives in programme specifications. The College undertakes internal annual monitoring and periodic review of modules and programmes and uses learning outcomes as a reference point.

1.56   The College considers students' evaluations, assessment practices, and outcomes data at programme team meetings, thus demonstrating evidence of the ongoing review of standards. External monitoring and periodic review reports are considered at the College's Academic Board.

1.57   The College monitors and reviews its programmes in line with Pearson and BAAB requirements. Therefore, the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

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

Findings

1.58　　The College asserts that Pearson takes the lead for its programmes in respect of the use of external and independent expertise, through its responsibility for the design and approval of programmes. As part of this Pearson makes use of external expertise in managing its academic standards through external subject expertise and employer involvement.

1.59　　The College maintains that it mirrors these processes in its internal deliberations on quality monitoring and periodic review though this appears to be limited to the input of external examiners through annual reporting and external membership of some periodic review panels. There is also evidence that the College benefits from links with industry practitioners through guest speaker programmes and occasional workshops.

1.60　　Although the College has plans to establish an Advisory Board with external membership, at present none of the College's senior committees include membership external to the college. The lack of externality supports the recommendation in Expectation A2.1. The inclusion of external members in discussion at a senior level relating to assurance of standards would enable the College to meet the Expectation even more securely.

1.61　　Programme leaders liaise with practitioners on the content of modules and ideas for assessment briefs, although this appears to be sporadic and not part of a formalised structure of engagement.

1.62　　The College's arrangements would, if securely implemented, allow this Expectation to be met.

1.63　　The review team scrutinised the College's response to the Expectation through consideration of terms of reference of boards and committees, minutes of periodic reviews and meetings with employers, agendas for guest speakers and the meetings with senior and academic staff.

1.64　　Across the College, formal and regular liaison with industry practitioners is at an early stage of development, although this may be assisted by the launch of the Advisory Board in 2019. While the current links may enrich the experience of students they do not at this stage appear to have a direct impact on the setting and maintaining of academic standards. Nevertheless, there are sufficient examples of the use of external and independent expertise to assure standards. Therefore, Expectation is met and the level of associated risk is low.

Expectation:　Met
Level of risk:　Low

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

1.65   Of the seven Expectations for this judgement area, five are met with a low level of risk, while one is met with a moderate level of risk and one is not met with a serious level of risk. There are two recommendations, no affirmations and no features of good practice.

1.66   Expectation A1 is met with a moderate level of risk. It contains one recommendation, relating to the need to ensure that the programmes in the City College of Acupuncture continue to be positioned at the relevant level of the FHEQ. This recommendation arises from a weakness in the operation of the academic governance structure and insufficient emphasis to assuring standards in the College's planning processes.

1.67   Expectation A2.1 is not met with a serious level of risk. It contains one recommendation, relating to the need to revise the College's academic framework and regulations, and implement them in order to ensure secure institutional oversight of quality of learning opportunities and academic standards. This recommendation arises from shortcomings which indicate ineffective operation of the College's academic governance in the maintenance of academic standards and oversight of the quality of learning opportunities, and because the College appears to have only limited understanding of its responsibilities for ensuring effective oversight of academic standards. These shortcomings constitute a major gap in the manner in which the College engages with this Expectation.

1.68   Additionally, weaknesses in Expectations A3.4, B1, B2, B3, B5 and B8 arise from weaknesses in the College's governance structure in relation to a lack of secure academic oversight of its procedures for ensuring the quality of learning opportunities. These weaknesses accordingly contribute to the recommendation in Expectation A2.1.

1.69   In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. While most of the Expectations in this judgement area have been met, the Expectation which is not met presents a serious risk to the management of academic standards. The recommendations identified in this judgement area relate to a weakness in the operation of the academic governance structure, to insufficient emphasis to assuring standards in the College's planning processes, and to ineffective operation of the College's academic governance in the maintenance of academic standards and oversight of the quality of learning opportunities. The College has not recognised that it has problems in respect of the areas relating to these recommendations and appeared to have only limited understanding of its responsibilities in those areas.

1.70   The review team concludes that the maintenance of the academic standards of the awards offered on behalf of its awarding organisations and the setting and maintenance of the academic standards of the awards offered by the College **does not meet** 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 The majority of the College's programmes are designed, developed and approved by Pearson. The College customises the Pearson programme specifications for students and develops its own specifications for the CCA programmes.

2.2 Within the delegated authority from Pearson, the College undertakes certain roles and responsibilities including the selection of optional units, the design of strategies for teaching and learning, the development of learning materials, and the design and approval of assessments.

2.3 In respect of CCA programmes, the College has overall responsibility for setting and maintaining standards, and for ensuring that clinical and ethical practices align with external requirements. College staff select units aligned to the Standards of Education and Training for Acupuncture, and design and develop teaching, learning and assessment strategies, as well as learning materials. The College achieved full accreditation for these programmes from BAAB in 2016 and has affirmed that they have been mapped to Subject Benchmark Statements for medical courses where appropriate.

2.4 These arrangements would, if securely implemented, allow this Expectation to be met.

2.5 In testing this Expectation, the review team examined BAAB accreditation documents, a completed planning checklist, and the minutes of the College's committees. The team also held meetings with senior staff and teaching staff.

2.6 While the terms of reference of the SLT include the approval of recommendations from the Academic Board on the approval of new programmes and the re-approval of existing programmes, the College acknowledges that it does not yet have a formalised process for the approval of programmes, but considers that work has started on this through the introduction of a programme planning checklist.

2.7 The processes for the design and development of programmes aligned to Pearson and BAAB requirements are operating effectively. For Pearson programmes the College is responsible for designing the teaching and learning approaches, and providing tailored programme specifications. Pearson reports these activities to be satisfactorily undertaken by the School.

2.8 The College is also responsible for the selection and design of units, teaching, learning and assessment strategies, and the development of learning materials for the CCA programmes. Evidence considered during this review, including the College's response to an external review by BAAB in 2018, confirms that these programmes have been designed securely.

2.9 Academic staff are instrumental in the design and development of programmes. Programme team meetings are used effectively for liaison regarding unit content, assessment methods, and the design of assessment briefs. Assessment briefs are approved internally through verification prior to delivery, and externally through the external examiner. After delivery, teachers reflect on units, producing written unit summaries and identifying future improvements.

2.10 The stated mechanisms through which the College maintains oversight and formal approval of its programmes include: the submission of completed planning checklists to the Principal for approval; the identification and approval of changes to the College's portfolio of programmes at Academic Board; and the approval of recommendations from the Academic Board relating to new programmes by the SLT. In addition, the Assessment and Academic Boards of the CCA programmes have authority to approve minor changes to these programmes. The review team recognises that the lack of recent programme development within the College has limited its opportunities to see processes in action and consequently, the team saw little evidence to confirm their effective operation.

2.11 The process for planning new programmes or changes to existing programmes centres on the use of a programme planning checklist. Used during the recent conversion of higher national programmes in Health Care Practice to the RQF framework, it enables programme teams and senior leaders to consider a range of factors affecting a programme prior to delivery. Sections of the plan include, for example, the embedding of employability, equality, literacy, learner destinations, work placements, staffing, assessment, delivery methods, and resources.

2.12 While this approach to programme development and approval is likely to be effective in enabling the College to ensure the quality of learning opportunities in programmes being developed, it does not enable the College to demonstrate and record how programmes align to the FHEQ or how the introduction of a programme will align with the College's business and curriculum plans. Minutes of the Academic Board confirm receipt of the planning checklist, however, there is only limited evidence to demonstrate the escalation of recommendations to the SLT from the Academic Board, and consequently appropriate receipt of these at SLT. The lack of consistent oversight by Academic Board and the SLT contributes to the recommendation in Expectation A2.1 regarding the need to revise academic governance structure and procedures. In order to ensure effective arrangements for discharging its responsibilities for setting and maintaining academic standards, the team **recommends** that the College should further develop and formalise procedures for the design, development and approval of programmes.

2.13 The College follows Pearson's and BAAB's requirements for programme approval. Although it lacks formalised procedures for the internal approval of new programmes, the lack of recent or planned programme development and the College's awareness of the need to develop and implement formalised procedures mitigates any risk in this regard. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

2.14   The College has overall responsibility for determining policies and procedures for the recruitment, selection and admission of students, including setting entry criteria, for all of its programmes. The College's arrangements for recruitment, selection and admissions are outlined in the Student Recruitment and Admissions Policy and have been developed with reference to the principles of fair admission set out in Fair Admissions to Higher Education: Recommendations for Good Practice (2004) (the Schwartz Report). Although the terms of reference of the College's senior committees do not explicitly refer to responsibility for oversight of admissions processes, staff of the College affirmed that the Academic Board reviews entry criteria annually.

2.15   The College's arrangements for selection and admission of students include tests of applicants' competence in English and in numeracy, and interviews conducted by at least two members of staff. For HND and BTEC programmes, the Director of Student Records and Finance is responsible for approving admissions decisions. For CCA programmes, the responsibility lies with Programme Leaders. Applicants who fail to gain admission have recourse to an appeals process.

2.16   The College's policies and procedures for the recruitment, selection and admission of students would, if securely implemented, enable the Expectation to be met.

2.17   To test the operation of these arrangements the team scrutinised a range of documentation relating to recruitment, selection and admission including sample records of student applications, minutes of key committee meetings and published admissions information on the website. The review team also held meetings with senior staff, teaching staff, professional support staff and students.

2.18   The procedures described in the Recruitment and Admissions Policy are transparent and reliable; they include details of selection criteria, the application process, timescales, key milestones and expectations for communications between the College and the applicant. The Recruitment and Admissions Policy and the Admissions Appeals Procedure are accessible for prospective BTEC HND and Diploma students on the College's main website. However, the CCA makes use of a distinct website, which does not offer full information about admissions processes: there is no information about admissions timescales, appeals and arrangements for reasonable adjustments. The review team **recommends** that the College should ensure that the Recruitment and Admissions Policy and Admissions Appeals Procedure are made available to all applicants on its websites.

2.19   The College's premises are located on an upper floor. Access to them is by means of a staircase which may pose a limitation on access to people with a physical disability. This limitation on access is not apparent on the College's websites. With a view to ensuring that potential students are made aware of this limitation, the review team **recommends** that the College should ensure that limitations on physical access to the College's premises are published on its websites.

2.20   Students expressed positive views about the information they received about the College and its programmes before applying, affirming that it helped them to make informed decisions. Admission staff provide comprehensive information about the College during interviews and also provide detailed individual feedback on applications when requested.

2.21   The College has affirmed that it is committed to an inclusive approach to the provision of learning opportunities, and it has taken active steps to strengthen its approach to this. It has introduced presentations at interview and has clarified its processes for recognition of prior learning. It has also responded to concerns around student English language proficiency in the 2017 Annual Monitoring Report by changing its entry tests to align more closely with Pearson requirements. The College also encourages students who pass the entry test but who are non-native English speakers or do not have a relevant English qualification, to enrol onto a level 2 English course alongside their studies. Teaching staff commented that student engagement and attendance has improved as a result of these changes.

2.22   Staff with responsibility for admissions are familiar with the College's policies and procedures and confirmed that the College supports them to carry out their role. Staff who conduct interviews use an interview checklist which ensures reliability and validity of decisions. A sample of student application records demonstrated that the procedures outlined in the Recruitment and Admissions Policy are followed effectively.

2.23   The review team found limited evidence of systematic internal oversight of recruitment, selection and admissions procedures, other than a gap analysis in response to the 2017 Annual Monitoring Report. Although the Recruitment and Admissions Policy identifies the Academic Board as being responsible for evaluation and review of the admissions procedure, the terms of reference of Academic Board do not reflect this responsibility and the minutes of Academic Board show no oversight since October 2016. Although the College's admissions staff collect data on the recruitment and admission of students, it is unclear how this is used at senior levels to ensure that the College's processes are effective. The weaknesses in oversight provided by the Academic Board in relation to admissions support the recommendation in Expectation A2.1 in respect of the College's academic governance structure.

2.24   The College operates transparent, fair and inclusive recruitment and admissions procedures that enable the selection of students with the potential to complete their chosen programme. While ensuring it publishes information around its admissions procedures and physical access limitations on its websites would allow the College to meet the expectation more fully, the overall approach is sound. The Expectation is met. The shortcomings which gave rise to recommendations reflect a need to amend or update documentation and will not require major operational or procedural change. The level of associated risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B3: Learning and Teaching*

Findings

2.25   The College's approach to learning and teaching practices is set out in the Learning and Teaching Policy. Teaching effectiveness is identified as a core value and is based on active learning where students take appropriate responsibility for their learning. The policy also identifies practical steps to improve the quality of teaching and student engagement with learning. This is supplemented by the articulation of learning and teaching methods in the Student Handbooks for the various programmes. Handbooks also outline the programme structure and content, its delivery and assessment, and the support services and facilities available. Formative assessment is embedded into all modules and regarded as an important developmental aspect in the learning process.

2.26   The curricula of all programmes are vocationally based and include both study and employability skills, coupled with an emphasis on independent study and critical analysis through the Research Project.

2.27   The Observation of Teaching and Learning Policy allows for an annual process including one formal observation by a senior member of academic staff, one peer observation, and at least one drop-in observation of teaching staff by the relevant Programme Leader which may be triggered by issues raised by members of staff or students. A formal observation process is also carried out as part of the probationary period for new staff.

2.28   The Staff Development Policy sets out the College's aspirations in this respect and this is implemented through the annual appraisal process (Performance Review and Development). The appraisals, conducted by the line manager, allow the setting of targets for staff and a discussion of their individual developmental needs evidenced by the staff development action plans.

2.29   Teaching quality is also monitored by student feedback, module evaluations and the National Student Survey (NSS).

2.30   The College's arrangements would, if securely implemented, allow this Expectation to be met.

2.31   The review team tested this Expectation by reviewing College policies, programme handbooks, monitoring reports and relevant meeting minutes. The team also met with senior and academic staff, and students.

2.32   Academic staff are suitably qualified and have the appropriate career experience to teach at the relevant subject level. The selection panel for a recently appointed member of staff included a student representative, and the College affirmed that it intends to follow this practice for future staff appointments. Teaching staff qualifications are checked as part of the recruitment procedure. Recently appointed members of staff confirmed that their initial induction had been valuable.

2.33   The Staff Development Policy demonstrates a strong commitment to supporting staff development activities as exemplified by the five professional development workshops related to learning, teaching and assessment, which the College has hosted during the current year.

2.34   Academic staff confirmed that teaching observations take place in line with the Observation of Teaching and Learning Policy, and that staff find them valuable in enabling them to check on their own progress and in benefiting from guidance from experienced teachers. Newly appointed members of staff are subject to monitoring from teaching observation by peers and by their line manager, as well as from student feedback.

2.35   Staff employ strategies to support students' individual needs, including additional one-to-one sessions, comprehensive feedback, clear explanations of learning outcomes and extra support to the extent of making themselves available through social media out of hours. Students confirmed their high regard for the commitment of staff to providing academic support.

2.36   The responsibility for oversight of learning and teaching is divided between the SLT and the Academic Board with no coherent rationale for the allocation. For example, student attendance - a key priority for the current year - and professional development of staff have been discussed at SLT meetings whereas the NSS results and reports relating to, for instance, reports from external examiners, Staff-Students Liaison Committees (SSLCs), Annual Programme Monitoring, and Examination Boards have been considered at the Academic Board. The lack of coherence in the arrangements for oversight supports the recommendation in Expectation A2.1 regarding the College's academic governance structure.

2.37   Overall, the College works effectively with staff and students to provide a supportive and effective environment for the provision of learning opportunities and teaching practices. The Expectation is met and the level of associated 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

2.38   The College, in its mission, is committed to providing the highest quality of service to its students. To enable this, it makes a range of support mechanisms available.

2.39   Student induction is delivered by members of the SLT including guidance on College policies, health and safety matters and the requirements and standards expected on programmes. Student Handbooks also outline the programme demands and the support services available. These are provided in electronic format, and, for students on CCA programmes, they are supplemented by Unit or Module Guides for each subject.

2.40   Students' academic progress is regularly monitored by Programme Team meetings and at Assessment Boards, supplemented by end-of-term and end-of-year reviews.

2.41   The College's VLE and its intranet are used by academic staff and students as a tool to support student learning. They are used by students for the submission of assessments, enabling the use of plagiarism-detection software. An app developed by the College (Showbie) is used to assist blended learning and group communication outside the classroom and is available on a range of mobile devices. This is supplemented by HN Global, an online facility provided by Pearson, as an additional resource to support learning.

2.42   Applicants are invited to disclose any physical or mental health conditions and this invitation is repeated at induction following enrolment. This is followed, where appropriate, by discussion concerning any additional support required leading to an action plan for mentor support. Support arrangements are kept under regular review at appropriate intervals.

2.43   Pastoral care is governed by the Pastoral Care Policy and Practice. This sets out the academic and pastoral support available and is highlighted to students during their induction. A dedicated Student Welfare Officer has overall responsibility but the College regards all staff, whether academic or professional support, as having day-to-day responsibility for the pastoral care of students.

2.44   The College's arrangements would, if securely implemented, allow this Expectation to be met.

2.45   The team tested this Expectation by examining student support policies and processes, external examiner reports and relevant meeting minutes. The team also met senior and academic staff, professional support staff, and students.

2.46   The induction sessions before the start of their programmes provide all students with a detailed introduction to their programme and to academic and pastoral support arrangements. Students expressed positive views about the effectiveness of their induction, drawing attention to guidance about requirements for coursework, work experience, and health and safety.

2.47   Careers advice and general employability skills are embedded into the curriculum through the study skills module and there are plans to introduce Career Fairs to benefit students on all programmes. Academic staff affirmed that they have good relationships with local universities in order to facilitate students' progression to further study.

2.48   The Resource Management Policy sets out broad expectations in relation to support for library and IT resources. The library budget is agreed annually and tutors contribute by suggesting titles for purchase. The library is limited to reference use only, and students expressed the view that they would like to be able to borrow books from the library. Arrangements are in place with the British Library and City Business Library for students of the College to use these as an additional resource.

2.49   The College has a strong ethos of academic support and pastoral care for its students, governed by appropriate policies, procedures and practices to ensure students' development. Students spoke very highly of the quality of support and resources provided for them throughout the programme. The mechanisms to ensure academic support for students with disabilities are effective. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B5: Student Engagement*

Findings

2.50   The College uses a range of formal and informal mechanisms to engage students in the assurance and enhancement of their educational experience. There is a system of student representation, whereby each cohort of students selects one of their peers to raise their suggestions and participate in the College's deliberative committees. Student representatives discuss student views with staff at termly SSLCs. Students have opportunities to give feedback on their programmes through unit evaluations, surveys and one-to-one reviews at key points during the student lifecycle. In addition to these formal arrangements, the College operates an open-door policy which encourages students to raise concerns informally at any time.

2.51   Through its representational structures, SSLCs and student unit evaluations, the College has taken deliberate steps to engage students as partners in the assurance and enhancement of their academic experience. These arrangements would enable the Expectation to be met.

2.52   To test their operation the review team scrutinised a range of documentation including minutes of key deliberative committees, analysis of student feedback and documents relating to programme monitoring and review. The review team also held meetings with staff, students and student representatives.

2.53   The review team found the College to be effective at promoting an open environment in which students feel able to discuss their educational experience with staff. Students said that they often raised concerns with staff informally, as well as through feedback surveys and their student representatives. They particularly appreciate the open-door policy, which enables quick resolution of any issues. Students on the BTEC HND and Diploma programmes spoke in positive terms about the blended learning app (Showbie), introduced in 2018, which facilitates communication between students and staff on Pearson programmes. Students confirmed that the College listens and responds to their opinions: examples of changes made by the College as a result of their feedback include, but are not limited to, the purchase of specific books for the library and improvement of the sound in videos.

2.54   Minutes of Programme Team meetings demonstrate that the College considers feedback gathered from unit evaluations and student representatives at programme level. The College has embedded consideration of student feedback in its internal annual programme monitoring and periodic review process. However, the review team noted that minutes of discussion around student feedback at Academic Board lack consistent evidence of reflection, such as analysis of trends, and of action, such as promotion of good practice. While the minutes of the Board's meeting in September 2018 include evidence of discussion of SSLC matters and of responses to student concerns, minutes of previous meetings do not show consideration of these matters. The lack of formal consideration of student views at senior levels in the College supports the recommendation in Expectation A2.1 in relation to the College's academic governance structure.

2.55   The review team did not meet any student representatives who had attended committee meetings, due to their being scheduled for later in the 2018-19 academic cycle. However, minutes of SSLCs, Programme Team Meetings and Academic Board confirm that

students regularly participate at these levels. The terms of reference of the SLT require it to use the views of students to inform decision making, to determine the College's educational character, and to evaluate its performance in relation to its educational objectives; minutes of its meetings show that it makes decisions concerning students' educational experiences, such as changes to the student representation system. Nevertheless, its composition does not include students. Direct student input to this decision making would allow the College more securely to demonstrate engagement with students as partners, and its absence is a weakness in the College's governance structure affecting its ability to exercise secure oversight of the quality of its provision. The team **recommends** that the College ensure student representation at all levels in the deliberative committee structure.

2.56   The College ensures that staff and student representatives can have informed conversations. It provides general training for student representatives and has invited them to sessions delivered by external bodies, such as the Office for Independent Adjudicator (OIA) and the British Dyslexia Association. Student representatives confirmed that they felt well informed and supported in their role. Students are updated about any changes made as a result of their feedback on the 'You Said, We Did' section of the intranet.

2.57   The College has a positive attitude towards receiving and responding to student views, and its formal processes to engage students individually and collectively in shaping their educational experience have enabled development of the College's provision. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

2.58   The College provides policies and procedures for assessment that cover the aims of assessment, submission of assessed work, malpractice and feedback to students. The Assessment Policy also sets out guidelines for the internal verification of assignments and assessment decisions, and moderation of coursework. The College's regulatory framework for assessment applies to all higher education programmes delivered at the College. For Pearson programmes, academic staff both set and grade unit or module assessments following Pearson requirements for internal verification prior to and after assessment. Academic staff also carry out second marking for the CCA programmes. Assessments for all programmes are subject to external examination.

2.59   Programme Assessment Boards are held at least twice a year to confirm student achievement, and to consider incidences of malpractice or applications for extenuating circumstances. Oversight of the outcomes of assessment boards is maintained by the Academic Board. The CCA programmes run a separate programme of Assessment Boards from that for the Pearson programmes.

2.60   The College's Recognition of Prior Learning Policy sets out its arrangements for the evaluation of evidence and makes reference to Ofqual and Pearson requirements.

2.61   The processes and procedures that the College has in place together with Pearson and BAAB requirements for assessment design, marking, moderation, feedback and external examining would enable the Expectation to be met.

2.62   In testing the Expectation, the review team considered a range of documentation related to the processes of assessment, including Pearson and the College's assessment policies and procedures, examples of assignment briefs and assessed work, external examiner reports, and programme handbooks. The team also met academic staff and students to discuss the operation of assessment processes and provision of feedback to students.

2.63   In response to issues in assessment practices raised in previous QAA reports, the College has effectively revised its framework of policies and procedures. The Assessment Policy emphasises five core principles of promotion of learning, transparency, equity, validity, reliability; highlights the importance of inclusivity in assessment tasks; recognises the importance of formative and summative assessment, and feedback for improvement. It provides detailed guidance on the principles of assessment and practical steps staff need to take including guidelines for internal verification of assignments and assessment decisions, submission of assessed work and return to students.

2.64   The Academic Conduct and Practice Procedure links the need for academic honesty to College values, and provides detailed and helpful guidance on three levels of malpractice - poor practice, academic malpractice, severe academic malpractice. Aligned to this, the Suspected Cases of Academic Malpractice Procedure (SCOAM) gives explicit guidance for staff on steps to be taken in such circumstances. Staff are well supported in this

with exemplar material, an aide memoire, and through training events. The Academic Malpractice Hearing Procedure is transparent, staged, involves impartiality, and includes the right to appeal and refer to the OIA. Examples of documents provided by the College demonstrate the effective application of this procedure. Communication with students relating to malpractice is fair, transparent and explicit.

2.65   The College has amended its approach to assessment submission, now permitting two summative submission attempts providing that permissible grounds for an initial referral are met. Students confirmed these arrangements and expressed their appreciation of the opportunities they have to receive formative, ungraded feedback. Assessment feedback indicates confirmation of achievement and provides helpful guidance for improvement. Students are required to sign a declaration of authenticity prior to submitting their assessments through plagiarism-detection software. They are well supported on the use of this and how to avoid academic malpractice through induction and thereafter the study skills programme.

2.66   Students confirm overall satisfaction with the assessment process. They report that teachers explain assessments well, provide well designed assessment briefs, employ fair and unbiased practices as well as a variety of assessment methods. The approaches undertaken by teachers to redesigning assessments in order to avoid over use of lengthy written reports has also been positively commented on by some external examiners.

2.67   The College system for internal verification is fit for purpose and aligned to Pearson requirements for the higher nationals. External examiners confirm processes are sound while identifying individual ongoing aspects for improvement such as support in internal verification for new staff, signage and dating of all records. For the CCA programmes a system requiring further scrutiny of assessment decisions should a discrepancy of five per cent or more in marks between first and second markers helps to safeguard academic standards. External examiners report alignment with national standards across the provision.

2.68   Separate assessment boards held biannually maintain appropriate oversight. They confirm achievement, incidences of malpractice and applications for extenuating circumstances.

2.69   Based on the five principles of validity, currency, sufficiency, authenticity, and reliability, the College's policy for the recognition of prior learning confirms the acceptance of credit transfers from other recognised qualifications of an equivalent level, and where there is clear mapping of subject matter. Decisions on applications are escalated from the internal verifier to programme leader to Academic Board for final approval.

2.70   Assessment procedures and processes are clear and the College adheres to these, as well as to Pearson's and BAAB's requirements. Students confirm satisfaction with assessment practices. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B7: External Examining*

Findings

2.71   It is the responsibility of Pearson to appoint, train and remunerate external examiners for its programmes. External examiners confirm assessment and internal verification decisions made by the College and produce reports for the awarding organisation which are shared with the College.

2.72   Pearson external examiners visit the College at the end of each academic year, meeting with groups of students, teaching staff and senior managers. They also sample assignments, along with checking the relevant policies and procedures.

2.73   Similar arrangements are in place for CCA programmes, though in this case the external examiners are appointed by the College using the arrangements set out in the External Examiner's Appointment Policy.

2.74   External examiners' reports are received by the Quality Nominee and passed to programme teams for consideration. They are discussed at programme team meetings and an action plan developed where necessary. The College's Academic Board provides the final consideration of reports and ensuing actions.

2.75   The College's arrangements would, if securely implemented, allow this Expectation to be met.

2.76   In considering this Expectation the review team examined reports from external examiners together with examples of responses, minutes of relevant meetings (including Programme Teams, Assessment Boards and the Academic Board) and annual monitoring reports. The team also held meetings with senior staff, academic staff and students.

2.77   Staff were able to clearly articulate the process for the consideration of external examiner reports. They are discussed initially at programme team meetings and Programme Leaders then respond to the externals identifying any actions. Reports are placed on the College's intranet, thereby giving access to all staff and students. Action plans are developed in response to any issues identified and recommendations made in the reports. The plan is monitored by the programme teams and the Academic Board. Findings from the external examiner reports also feed into the annual monitoring review process.

2.78   The College engages positively with the external examining process and has a well established and effective system in place for responding to external examiner reports and comments. The Expectation is met and the level of associated 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

2.79   Reflecting its committee structure, the College's system of monitoring and review starts at student level with module and tutorial evaluation. Programme Team meetings involve students and provide regular opportunities for the continual monitoring of performance. For Pearson programmes, programme leaders produce annual programme monitoring reports. For the CCA programmes module reports are produced. A process for the formal presentation and approval of monitoring reports with final consideration at the Academic Board is currently being developed and implemented. Terms of reference assign responsibility for the approval of recommendations from annual programme monitoring to the SLT.

2.80   Pearson requires the College to monitor and periodically review programmes, while undertaking an annual Academic Management Review to check centre quality assurance systems, policies and procedures. BAAB also requires internal monitoring and review in addition to the external audits they undertake.

2.81   In response to a previous recommendation from QAA, the College is implementing a cycle of periodic programme review, reports from which are considered at the Academic Board.

2.82   In conjunction with Pearson and BAAB requirements, the processes and procedures operated by the College would enable the Expectation to be met.

2.83   In testing this Expectation, the review team considered the terms of reference of committees and minutes of meetings including those of Academic Board, SLT, and programme teams. In addition, the team met senior and teaching staff, support staff, and students.

2.84   The numerous formal and informal opportunities which students have to contribute to programme monitoring through attendance at the SSLC and programme team meetings, feedback surveys, involvement in the annual monitoring process and module and unit evaluations, ensure continuous engagement between staff and students, and contributions by students to monitoring and review of programmes. Comprehensive coverage of topics during programme team meetings includes, for example, consideration of student performance, assessment, feedback from external examiners, and administrative issues such as timetabling.

2.85   In accordance with detailed guidance on the annual monitoring process, programme leaders produce an annual monitoring report according to the College's and BAAB's templates. The draft reports for the Pearson programmes provide useful commentary on, for example, external examiner reports, teaching, learning and assessment, resources, information, and statistical data, and identify actions for improvement. The reports for the CCA programmes include detailed analysis of outcomes data and incorporate module evaluation reports.

2.86   The College's process for the oversight and approval of annual monitoring reports in 2018-19 involves presentation of the reports to programme teams and then subsequently to

members of the Academic Board in February 2019. At the time of the review visit draft reports were in the process of being presented to teams, consequently no evidence was available to illustrate this process or the planned involvement of the Academic Board in 2019. The review team also found no evidence within minutes to confirm that, in accordance with its terms of reference, the SLT has considered or maintained oversight of annual monitoring programme reports over the past year (see A2.1).

2.87   The College has introduced a cycle for the periodic review of programmes. Following a delayed start, the College asserts it is now on track to complete the cycle of review for HND programmes as they convert from the QCF to the RQF, and for other programmes in 2019. The example report presented for the HND Hospitality Management indicates this is an in-depth review structured on the UK Quality Code with scrutiny by a panel. Coverage includes the setting and maintenance of threshold academic standards, the quality of students' learning opportunities, information about higher education provision, and the enhancement of students' learning opportunities. Strengths and recommendations for improvement are identified in each of these sections, and further observations made by a panel. Examination of the minutes of the Academic Board September 2018 provides evidence of the approval of this report, and that the strengths and recommendations within it were welcomed. However, the minutes are not sufficiently detailed to provide an insight into any discussions that took place, or into the content or key messages contained in it, indicating that the Board has not taken advantage of opportunities to gain full oversight of standards.

2.88   The College is introducing systems for programme monitoring and review and has assigned responsibility for monitoring and maintaining oversight of the progress on actions arising from reviews. However, the rigour and speed with which senior leaders maintain oversight is insufficiently robust. Minutes of the Academic Board are insufficiently detailed, hence the opportunity to gain and build oversight of the themes from all reports and inform future planning is restricted: this shortcoming supports the recommendation in Expectation A2.1 concerning the College's structure for academic governance. Although required in its template, the College's action plan for 2018 includes very little commentary on the progress against actions, and contains no reflection on the impact of completed actions, and no evidence of actions at provider level that have arisen from internal review. The schedule for annual programme monitoring means that final approval and the opportunity for senior managers to gain oversight of these will not happen until midway through the following academic year in February 2019, giving rise to a risk that key messages from reports will be learnt too late in the year for effective actions to be implemented at provider level. In view of this the team **recommends** the College establish a systematic approach at a senior level to the development, monitoring and oversight of the College's action plans.

2.89   The monitoring and review of programmes meets awarding body requirements and College processes are being implemented to supplement this, and hence the Expectation is met. The lack of oversight of key messages from monitoring and review processes and of provider-generated action plans indicates a weakness in the operation of the academic governance structure; the associated level of risk is moderate.

Expectation: 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

2.90   The College is responsible for determining internal procedures for student complaints and academic appeals for all of its programmes. There is a general complaints procedure for all students and separate academic appeals procedures for students on Pearson programmes and those enrolled on CCA programmes. The College also has a complaints and appeals procedure for prospective students during the admissions process.

2.91   The College is a subscriber to the Office of the Independent Adjudicator and complies with its good practice framework. The complaints procedure informs students of their right to take a complaint to the Office of the Independent Adjudicator once the College's internal processes have been exhausted. Students studying the HND and Diploma may alternatively escalate their complaint or appeal to Pearson.

2.92   The arrangements outlined in the College's complaints and academic appeals procedures would enable the expectation to be met.

2.93   The review team tested the operation of these policies by scrutinising a range of documentation relating to complaints and appeals, including policies, handbooks and example cases. The review team also held meetings with senior staff and with students.

2.94   The Complaints Policy and Academic Appeals Policies clearly outline the grounds for complaints and appeal, the distinction between them, the roles and responsibilities of staff and students, indicative timescales, and expectations for the College's communication with the student involved.

2.95   The College effectively communicates its Complaints Policy to students by making it available on its intranet. However, there are inconsistencies in the way the College communicates its complaints and appeals procedures to students through handbooks. For example, there is no information for Pearson students about the option to escalate their complaint to Pearson; the descriptions of the appeals procedure in Course Handbooks vary greatly in the level of detail provided. Nevertheless, staff and students confirmed that they were aware of the College's procedures for complaints and appeals and could access these on the College's intranet. The College's induction for new students includes descriptions of its complaints and appeals procedures, and staff and student representatives have attended training delivered by the Office of the Independent Adjudicator.

2.96   The College has received one formal complaint and two formal academic appeals in the past 12 months. The records of the formal complaint and of academic appeals received in 2018 show that they were resolved in a fair and timely manner.

2.97   The College does not formally monitor complaints for enhancement purposes, due to the small number of complaints it has received to date. The College has recognised this weakness and, following advice from the Office of the Independent Adjudicator, has affirmed its intention to keep a log of informal complaints and use these for monitoring and enhancement purposes. Although the process for systematic review of policies is still being formalised, the review team saw evidence that the College has updated its complaints procedure in response to advice from the Office of the Independent Adjudicator and a

recommendation from the QAA.

2.98   The College has procedures for handling academic appeals and student complaints which are fair, accessible and timely. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

2.99   A number of the College's programmes, specifically the HND Health and Social Care Management, the HND Social Community Work, the HND Healthcare Practice, and the Diploma in Education and Training, contain modules requiring a specified number of hours of work experience to enable students to meet module outcomes. However, the College does not regard itself as having any formal responsibility for managing relationships with the employers of students for whom workplace experience is a requirement and contributes to achievement of module outcomes. Most students admitted to these programmes are already in relevant employment, and the College has no formal mechanisms to manage the relationship with external organisations which provide work experience for its students.

2.100   These arrangements do not include sufficient oversight of work placements to allow the Expectation to be met.

2.101   The review team tested this Expectation by examining relevant documentation including the memorandum of understanding for teaching practice and module learning outcomes, and met senior staff, academic staff, and students.

2.102   The HND Health and Social Care Management, the HND Social Community Work, and the HND Healthcare Practice require students to complete a minimum number of hours of work experience/placement in health and/or social care settings and a Professional Learning and Development Portfolio (PLAD), including reflective accounts. Although students are expected to find their own work placement to provide evidence of working in the industry, in some circumstances the College may help students to find a suitable workplace. Typically, the student's completion of the requirements is satisfied by a letter from the employer confirming the hours worked and the nature of work, supplemented by the PLAD maintained by the student.

2.103   The College uses a form of Memorandum of Understanding for employers which provides an outline of the purpose of the work experience and the employer's obligations under relevant legislation. Although the Memorandum of Understanding states that it is for use only for teaching practice on the Diploma in Education and Training, staff of the College affirmed that it is used for all programmes for which workplace experience is required. However, the College lacks evidence of definitions of roles and responsibilities in managing relationships with work placement providers, and of any formalisation of these relationships. The roles and responsibilities of the student, the College and employers are not clearly documented. The scrutiny carried out by the College is generally limited to a check that the employer exists, a check that the employer has confirmed that the required number of hours have been completed and a review of the PLAD. The College does not carry out any formalised test of the suitability of the placement or of the working environment and does not keep a list of workplaces at which workplace experience/placements take place.

2.104   The review team formed the view that the College does not have sufficiently secure mechanisms to determine whether students' employment is suitable to meet the required outcomes and to monitor and assess the achievement of those outcomes at the workplace. The arrangements for oversight of work placements lack formalisation and clarity. The team

recommends that the College should establish and implement secure arrangements for the management and oversight of work placements. The shortcomings in the management of work placements indicate a lack of clarity about responsibilities within the governance structure. The Expectation is not met and the risk is moderate.

Expectation: **Not 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

2.105   The College does not offer research degrees.

Expectation: Not applicable
Level of risk: Not applicable

The quality of student learning opportunities: Summary of findings

2.106   In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. Of the ten applicable Expectations in this judgement area, eight are met with a low level of risk, one is met with a moderate level of risk and one is not met with a moderate level of risk. Weaknesses which have led to moderate risks have arisen from weakness in the operation of the academic governance structure and lack of clarity about responsibilities in the academic governance structure.

2.107   Expectation B10 is not met, because the College does not have sufficiently secure mechanisms to determine whether students' employment is suitable to meet the required outcomes and to monitor and assess the achievement of those outcomes at the workplace, and because its arrangements for oversight of work placements lack formalisation and clarity.

2.108   There are six recommendations in this judgement area. These relate to the need to further develop and formalise procedures for the design, development and approval of programmes; the need to ensure the completeness of information for prospective students published on websites; the need to ensure that limitations on physical access to the college's premises are published on its websites; the need to ensure student representation at all levels in the deliberative committee structure; the need to establish a systematic approach at a senior level to the development, monitoring and oversight of the college's action plans; and the need to establish and implement secure arrangements for the management and oversight of work placements.

2.109   Additionally, weaknesses in Expectations B1, B2, B3, B5 and B8 arise from weaknesses in the College's governance structure and contribute to the recommendation in Expectation A2.1 in relation to its academic framework and regulations.

2.110   There are no features of good practice or affirmations in this judgement area.

2.111   There is evidence that the College is fully aware of its responsibilities for assuring quality, and responses to previous external review activity provide confidence that areas of weakness will be addressed.

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

3   Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1   The College publishes public information on two websites; one specific to Pearson programmes and one to CCA programmes. For current students and staff, the College publishes information on its intranet, which acts as a repository for programme materials and College policies, as well as an electronic noticeboard for updates. The College also publishes information for students in unit, programme and general handbooks.

3.2   The Principal and Director of Studies have overall responsibility for ensuring that the information the College produces is fit for purpose, accessible and trustworthy, with support from relevant professional support staff and programme leaders. There is a Communications Policy, which sets out methods and principles for communicating with staff, students and externals, a Social Media Policy outlining expectations for safe and respectful use of social media by members of the College.

3.3   The College's arrangements would, if securely implemented, allow this Expectation to be met.

3.4   To test the operation of these arrangements the review team scrutinised a range of published information in handbooks, on the College's intranet and on its websites. The review team also held meetings with staff and with students.

3.5   As noted in Expectation B2, the College's websites do not consistently include information about the College's admissions processes nor about the limitations on physical access to the College's premises. Otherwise, the information which the College publishes on its websites is clear, accurate and sufficiently detailed to enable prospective students to make informed decisions. Students expressed positive views about the information they received about their programmes before applying and confirmed that their expectations before coming to the College have aligned with their experience.

3.6   The College identifies handbooks as a primary means of informing current students about its policies and programmes. However, the review team found inconsistencies in the quality and detail of information the College publishes in student handbooks. As discussed in Expectations A2.2 and B9, the College does not publish overall programme specifications in CCA course handbooks, and the level of detail about the College's appeals procedures varies significantly between Programme Handbooks. Assessment criteria for CCA programmes appears in some Module Learning Guides.

3.7   Staff and students are able to access comprehensive information about the College's programmes, policies and procedures on the College's intranet. The College ensures during their induction that newly appointed staff and students are aware of its policies and procedures, including how to locate key information on the intranet. The College also provides specialist training around policies and procedures for staff and student representatives who have responsibility for maintaining standards and assuring quality.

3.8   The College ensures the information it publishes about its programmes is fit for purpose, accessible and trustworthy through its annual monitoring and periodic review process and through external review by Pearson and The British Acupuncture Accreditation Board. The College also operates a procedure whereby the Principal or Director of Studies approve updates to information. However, inconsistencies in the quality and detail of the information the College publishes on its websites and in student handbooks indicate shortcomings in its arrangements for information management.

3.9   The College has prepared a draft version of a publishing policy relating to public information and the College's policies, although the arrangements for approval and implementation of this policy are not yet confirmed. However there remain a number of weaknesses in the College's arrangements for managing information. There is no policy that defines the College's procedures for assuring the quality of information for current students; the College does not define minimum requirements for the information it publishes in handbooks, on the intranet, the website or the VLE. The review team **recommends** that the College should further develop, formalise and consistently implement a process for the management of information to ensure that all information continues to be fit for purpose, accessible and trustworthy.

3.10   The information provided by the College is fit for purpose, accessible and trustworthy. The Expectation is met. The College's arrangements for managing information are broadly adequate but have some shortcomings in the rigour with which they are applied. While the existence of a draft publishing policy indicates that the College acknowledges the need for action, the College has not declared the timescale on which this policy will be brought into effect. The associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

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

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

3.12   The single recommendation in this judgement area arises from weaknesses in the College's arrangements for managing information. These arrangements are broadly adequate but have some shortcomings in the rigour with which they are applied. Additionally, inconsistencies identified in Expectation A2.2 in the way that specifications are communicated to students through handbooks contribute to this recommendation.

3.13   There are no features of good practice or affirmations in this judgement area.

3.14   The review team concludes that the quality of the information about learning opportunities at the provider meets UK expectations.

4 Judgement: The enhancement of student learning opportunities

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

Findings

4.1 The College's approach to the enhancement of learning opportunities is informed by its motto, 'Where students come first'. Within its mission and the Teaching and Learning Policy, the College emphasises the importance of students being central to all its activities whether academic, pastoral, administrative or professional. These documents also articulate the College's commitment to providing high quality service to help meet local and national needs while fulfilling College expectations and providing an inclusive environment founded on equality of opportunity, and freedom from discrimination, bullying or harassment. A commitment to widening access to higher education for students through the removal or reduction of potential barriers to learning is expressed. The College expects staff and students to take responsibility for learning as active partners in order to empower students to achieve their potential for success.

4.2 Within its self-evaluation, the College acknowledges responsibility for enhancing learning opportunities stating that its strategic view of enhancement is taken as a 'necessary and integral part of quality delivery and assurance'. Furthermore, it is stated that the work of the Academic Board and its sub-committees, including the SLT, is used to maintain oversight of enhancement planning and delivery. The Principal maintains lead responsibility for the enhancement of the quality of students' learning opportunities.

4.3 A draft Enhancement Strategy, presented to the Review Team at the visit, is pending consideration and approval through the College's committee structure. The College generates and holds centrally student outcomes data that teachers use during Assessment Boards and within annual monitoring programme reports. In addition, teachers use feedback from students through a variety of mechanisms and external examiners' reports, to inform planning (see B5).

4.4 The College's arrangements would, if securely implemented, allow this Expectation to be met.

4.5 In testing this Expectation the review team considered evidence including the draft Enhancement Strategy, the Learning and Teaching Policy, terms of reference and minutes of committee meetings, draft APMR reports, and other relevant documentation. The team held meetings with senior staff, with teaching staff, with professional support staff and with students.

4.6 The College offered examples of action taken to improve the overall educational experience of students. Among others, these include the introduction of support for English language and study skills, delivery of units in employability skills, revision of the assessment strategy, staff continuing professional development. Further examples provided during meetings include increasing the library book stock, improving access to its wireless network, establishing a computer club, and development of the use of digital technology in learning and teaching. The College also drew attention to peer observation of teaching and to the inclusion of a student on a selection panel for a new member of staff as examples of enhancements. The review team recognised that these initiatives and activities have the potential to improve arrangements for students. However it found that, rather than arising from a deliberate enhancement strategy, they have in the main been introduced either in response to recommendations from previous external reports or in response to feedback

from students following the routine engagement mechanisms described in Expectation B5, or on an ad hoc basis driven by an individual staff member. Consequently, the team does not consider that these examples demonstrate deliberate steps at provider level to enhance the student learning experience.

4.7   The terms of reference of the College's two academic boards and of the SLT, and discussion in the course of meetings, indicate confusion as to responsibilities for enhancement of the College's provision. The terms of reference for the Academic Board assign responsibility for identifying and approving areas for enhancement highlighted through external results, for approving enhancement initiatives, and for considering and disseminating good practice across the College. Although a separate committee, the terms of reference for the CCA Academic Board have no reference to enhancement. There is no mention of responsibility for enhancement in the terms of reference for the SLT. However, during a meeting with senior staff reviewers heard that responsibility for enhancement lies with the SLT and the Academic Board, and in another meeting with senior staff that the SLT holds responsibility, albeit with possible consideration also by the Academic Board. In light of this confusion, the review team formed the view that there are no effective arrangements for systematic consideration at a senior level of the enhancement of the quality of learning opportunities

4.8   The minutes of the SLT and Academic Boards show little evidence that robust information is systematically generated to inform enhancement initiatives at a strategic level. The enhancement of student learning opportunities does not specifically feature as an agenda item in either committee. While the minutes of the most recent meeting of Academic Board in September 2018 show substantially more detail and breadth of content, many matters reported and considered tend to be operational in nature with a focus on confirming completion of processes. Minutes do not provide sufficient insight into discussions that take place or other documents that may have been considered, other than primary sources such as individual external examiner reports. There is inadequate evidence to demonstrate an informed and robust use of student survey data, or of programme and periodic reports to drive strategic enhancement at provider level. Although senior staff confirm the use of data during meetings, other than the use of detailed student achievement data by programme teams at assessment boards and in programme monitoring, there is a lack of evidence that senior committees receive and consider summary reports derived from the systematic analysis and evaluation of robust and timely information. Examples of this can be seen in the limited reference to the NSS results at Academic Board and in the lack of evidence to show strategic monitoring and oversight of key targets such as student attendance rates (see Expectation A2.1). The lack of summary reports across, for example, the outcomes of student evaluations and external examiners' reports, contribute to the lack of oversight by the College of its academic provision to identify and inform strategic enhancements at provider level.

4.9   As articulated in the draft enhancement strategy, the aims for enhancement indicate the College's intention to address this aspect of its work through the identification of higher-level overarching themes such as experience and engagement, academic practice, equality and inclusion, employability and employer engagement, the development of knowledge, research and scholarship. The section in the strategy listing examples of completed activities to illustrate how these strategic aims are already being addressed relies heavily on those actions listed previously and taken in response to previous external reviews or student feedback. Furthermore, the list of strategic activities planned for completion in 2018-19 includes many which may be regarded as routine working practice rather than strategic and deliberate enhancements. Examples include health and safety, the regular review of policies and procedures, monitoring of the College's action plan, engagement with the Office for Students and the Competition and Markets Authority. Consequently, the team does not consider the indicative approaches taken to applying this strategy will lead to secure

arrangements for enhancement of the College's provision. In view of these shortcomings, the review team **recommends** that the College should develop and implement a strategic approach to the enhancement of learning opportunities.

4.10　There is only limited mention within its documentation of the systematic identification and sharing of good practice across the College. Programme teams record feedback from external examiners and identify good practices within annual monitoring reports. Although the team heard of plans to introduce the use of software to enhance learning and communication across the Higher National and CCA programmes, there is a lack of evidence to demonstrate how good practice is systematically identified and shared or transferred within the College.

4.11　The College has undertaken a number of activities to improve the learning experience of students, but these have not arisen as a result of a deliberate approach at provider level. The lack of effective arrangements for systematic consideration of enhancement at a senior level indicates a weakness in the College's academic governance structure and a lack of clarity about responsibilities. While the establishment of a draft enhancement strategy suggests that the College intends to address this shortcoming, the strategy is not yet embedded. The Expectation is not met and the level of risk is moderate.

Expectation:　Not met
Level of risk:　Moderate

The enhancement of student learning opportunities: Summary of findings

4.12   The single Expectation in this judgement area is not met with a moderate level of risk. There is one recommendation, relating to the need to develop and implement a strategic approach to the enhancement of learning opportunities. The recommendation arises from a weakness College s academic governance structure and a lack of clarity about responsibilities in respect of the management of enhancement.

4.13   There are no features of good practice or affirmations in this judgement area.

4.14   In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The College's draft enhancement strategy indicates that it has plans to address shortcomings in this area, but these plans are under-developed and are not yet embedded in the College's operational planning. Failure to fully embed a strategic approach to enhancement of learning opportunities may lead to serious problems over time in the management of this area.

4.15   The review team concludes that the enhancement of student learning opportunities at the provider **requires improvement to meet** UK expectations.

Glossary

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

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**).

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

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

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

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

e-learning
See technology enhanced or enabled learning.

Enhancement
The process by which higher education providers systematically improve the quality of provision and the ways in which students' learning is supported. It is used as a technical term in our review processes.

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

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

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

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

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

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

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

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

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

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

Programme specifications
Published statements about the intended **learning outcomes** of programmes of study, containing information about teaching and learning methods, support and assessment

methods, and how individual units relate to levels of achievement.

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

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

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

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

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

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

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

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