



Higher Education Review (Alternative Providers) of Inter-Ed UK t/a The City College

October 2015

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About this review

This is a report of a Higher Education Review (AP) conducted by the Quality Assurance Agency for Higher Education (QAA) at Inter-Ed UK t/a The City College. The review took place from 12 to 14 October 2015 and was conducted by a team of three reviewers, as follows:

- Dr M Lockett (reviewer)
- Ms D McElwee (reviewer)
- Mr S Butler (student reviewer).

The main purpose of the review was to investigate the higher education provided by Inter-Ed UK t/a The City College and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the [UK Quality Code for Higher Education](#) (the Quality Code)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 (AP) the QAA review team:

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

In Higher Education Review (AP) there is also a check on the provider's financial sustainability, management and governance (FSMG). This check has the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure of their education provider.

A summary of the findings can be found in the section starting on page 2. [Explanations of the findings](#) are given in numbered paragraphs in the section starting on page 5.

In reviewing the College, the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland. The [themes](#) for the academic year 2015-16 are Student Employability, and Digital Literacy,² and the provider is required to select, in consultation with student representatives, one of these themes to be explored through the review process.

The QAA website gives more information [about QAA](#) and its mission.³ A dedicated section explains the method for [Higher Education Review](#) (AP).⁴ For an explanation of terms see the [glossary](#) at the end of this report.

¹ The UK Quality Code for Higher Education is published at: www.qaa.ac.uk/quality-code.

² Higher Education Review themes: www.qaa.ac.uk/publications/information-and-guidance/publication/?PubID=2859.

³ QAA website: www.qaa.ac.uk/about-us.

⁴ Higher Education Review (Alternative Providers): www.qaa.ac.uk/en/ReviewsAndReports/Pages/RSCD.aspx.

Key findings

QAA's judgements about Inter-Ed UK t/a The City College

The QAA review team formed the following judgements about the higher education provision at Inter-Ed UK t/a The City College.

- The maintenance of the academic standards of awards **meets** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities **meets** UK expectations.
- The enhancement of student learning opportunities **meets** UK expectations.

Good practice

The QAA review team identified the following features of **good practice** at Inter-Ed UK t/a The City College.

- The College has responded rapidly and coherently to significant changes in its student population, providing academic and pastoral support which are both fit for purpose and highly valued (Expectation B4).
- The College takes an inclusive approach to involving students in the enhancement of their learning opportunities (Enhancement).

Recommendations

The QAA review team makes the following **recommendations** to Inter-Ed UK t/a The City College.

By April 2016:

- ensure that the Complaints Policy is fit for purpose and effectively communicated (Expectation B9).

By June 2016:

- provide more detailed information, both on the website and in handbooks, on the detail of non-core units within its programmes (Expectation C).

By September 2016:

- develop a strategic approach to employer engagement and career guidance (Expectation B3).

Affirmation of action being taken

The QAA review team **affirms** the following actions that Inter-Ed UK t/a The City College is already taking to make academic standards secure and/or improve the educational provision offered to its students:

- the steps being taken to develop internal monitoring and periodic review procedures (Expectations A3.3 and B8)
- the steps being taken towards ensuring that all teaching staff make appropriate use of the virtual learning environment (Expectations B4 and C).

Theme: Student Involvement in Quality Assurance and Enhancement

The College gives high priority to student involvement in quality assurance and enhancement, providing training and support for committee representatives, and responding quickly and transparently to students' suggestions and evaluations.

About Inter-Ed UK t/a The City College

Inter-Ed UK t/a The City College (the College) was established in 1979 to provide education for local and international students through programmes of study validated by UK higher education institutions. Following the ending of its Tier 4 status and of two validation arrangements, the College now offers courses on behalf of Pearson Education, as well as a professional three-year Licentiate in Acupuncture, provisionally accredited by the British Acupuncture Accreditation Board, and a postgraduate continuing professional development programme. These involve supervised practice on live patients, are promoted under a separate website and are out of the scope of the present review. These changes saw a considerable reduction in student numbers (initially from around 700 to below 100) and consequential staff departures; today student numbers stand at some 400.

The College, which brands itself as an institution 'Where Students Come First', is committed to providing the highest possible standards of education to students from a wide variety of backgrounds. Strategically, its aims include extending its range of courses, introducing more flexible modes of study, and improving its levels of participation, retention and progression.

Since its QAA Review for Educational Oversight in 2012, (i) the College's long-serving Principal has retired; (ii) it has changed its management structure to strengthen its emphasis on higher education; (iii) it has simplified its committee structure to improve efficiency, emphasise enhancement and increase student involvement; (iv) it has become a designated provider of Pearson Education programmes; (v) it has seen the termination of former agreements with two UK universities; (vi) it has reviewed its arrangements for higher education programme delivery, which is now subject to annual review; (vii) it has established, for branding reasons, the City College of Acupuncture; and (viii) it has taken steps to ensure that its programmes are aligned with all relevant external expectations. These developments, and the College's responses to recommendations, have been reviewed by QAA in annual monitoring visits, the most recent of which took place in June 2014.

The College identifies its main challenge, in addition to those applicable to the sector more broadly, as adjusting to the changed demographic of its student population, which is now almost entirely UK-based and includes a high proportion of members with low levels of prior academic attainment and confidence. Its approach to this challenge includes the introduction of literacy and numeracy tests, workshops on computer skills and digital literacy, and a further strengthening of pastoral and learning support.

Explanation of the findings about Inter-Ed UK t/a The City College

This section explains the review findings in more detail.

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

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

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

a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (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.

Findings

1.1 Inter-Ed UK t/a The City College (the College) aligns its policies and practices for Higher National Diploma (HND) provision to the framework provided by the awarding body, Pearson Education, developing its own schemes of work within this framework. While responsibility for allocating the qualifications to the appropriate level and for the academic standards of the awards lies with the awarding body, the College discharges its responsibility for maintaining these standards primarily through its committee structure, culminating in the Academic Board, and guided by internal and external advice, management oversight and the expertise of its teaching staff.

1.2 External standards verifiers moderate a sample of scripts from each module, completing an annual report on the appropriateness of the assessment of learning outcomes, and stating whether standards are appropriate for the level and qualification. Programme teams' formal responses to issues raised by verifiers are incorporated into review and enhancement procedures and signed off by the Academic Board.

1.3 The review team confirms that the College engages with and responds diligently to awarding body review reports and external examiner reports; that student handbooks include the programme structure and core unit specifications; and that teaching staff receive training and development which are fit for the purpose of ensuring that they understand and are competent to discharge their responsibilities, including those relating to the FHEQ.

1.4 On the basis of documentary study and meetings with both senior and teaching staff, the review team confirms that the College discharges its operational responsibilities to ensure the maintenance of academic standards in a competent manner. The Expectation is therefore met and the risk low.

Expectation: Met

Level of risk: Low

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

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

Findings

1.5 The Academic Board, as the senior College committee, is responsible for ensuring adherence to awarding body policies and regulations. The College engages in what it terms a familiar quality assurance cycle, supported by external verifiers and moderators. The review team clarified in meetings that this cycle involves a Quality Improvement Plan (which takes the form of an Action Plan), a newly introduced quinquennial periodic review system, and internal and external reporting and monitoring. It meets the requirements of the awarding body.

1.6 The review team found the Academic Board appropriately constituted, with both senior management and student involvement. It discharges its responsibilities in a systematic and transparent manner, and transparent and comprehensive structures ensure the maintenance of academic standards.

1.7 The review team confirms, on the basis of its scrutiny of the Pearson Academic Management Review Report 2014-2015 and responses by staff at meetings, that the College fulfils its obligations in respect of reference points for academic standards. The Expectation is met and the risk low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.8 As a non-degree-awarding body, the College is responsible for ensuring that students have access to appropriate information about the range of programmes on offer. It follows that this information must be readily available and incorporated in its management information system. The review team examined the General Student Handbook and confirms that this is so. The team also discussed the fitness for purpose of the information with both staff and students, and, while confirming that it is accurate and appreciated, noted also the variability of detail on non-core elements of programmes (see paragraph 3.4).

1.9 The review team confirms that the College has discharged its obligations to the full. The Expectation is therefore met and the risk 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

1.10 The College's HNDs are validated by Pearson Education, with units designed by the awarding body and reapproved annually in a procedure initiated by the College. The College's programmes fulfil Pearson's curriculum requirements for mandatory core units and specified pathways. Elective units are selected by the College in accordance with Pearson Education frameworks and regulations. Aspects of the institutional procedures for new programme approval and selection of elective units are relatively informal, and, while currently fit for purpose, would require revisiting in the event of future expansion or increased complexity.

1.11 On the basis of documentary study and meetings with staff, the review team confirms that the College currently discharges its operational responsibilities in an effective manner. The Expectation is met and the risk 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

1.12 Responsibility for overseeing the conduct of assessment and maintenance of academic standards remains with Pearson Education, the regulatory frameworks of which inform assessment design and monitoring. The process is overseen by Pearson-appointed standards verifiers, and managed by the College Assessment Board.

1.13 The terms of reference for the committees dealing with assessment are designed to ensure that the design, approval and monitoring of assessment strategies maintain academic standards. Teaching staff are briefed on their roles and responsibilities. Student handbooks and, increasingly, the virtual learning environment (VLE), contain all necessary assessment information expressed in a practical and accurate way; comprehensive marking and grading descriptors are included in assignment briefs.

1.14 The College fulfils its operational responsibilities by ensuring that procedures for setting and internally verifying assessments set by staff are properly implemented. Staff described these procedures very positively, seeing them as contributing not only to assuring academic standards but also to quality enhancement and their own professional development. Assessments are marked in accordance with relevant Pearson Education assessment criteria, and the achievement of learning outcomes is subject to internal verification and confirmation by the College Assessment Board, overseen by the external verifier.

1.15 On the basis of documentary study and meetings with staff, the review team confirms the competence and professionalism of College procedures. The Expectation is met and the risk 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

1.16 The College's discharge of its responsibilities for programme monitoring and review is subject to Pearson Education oversight. Given the changes in the College's portfolio, these procedures have yet to be entirely put in place and systematically embedded. Nevertheless, the current internal annual monitoring system, which has been developing since 2014, is comprehensive in scope and fit for purpose.

1.17 From the academic year 2015-16, actions arising from this monitoring system will be incorporated into a comprehensive Quality Improvement Plan, replacing the existing Action Plans, and a rolling schedule of periodic reviews will commence later in 2016 (see also paragraph 2.31). The review team confirms that preparations for these developments are at an advanced stage and **affirms** that the College is establishing annual and periodic monitoring and review procedures for all higher education programmes (see also Expectation B8).

1.18 The review team found that College staff are aware of their responsibilities and competent to discharge them. The Expectation is met and the risk 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

1.19 The College is alert to the importance of engaging external expertise in the maintenance of academic standards. Stakeholder feedback is provided by moderators, industry practitioners, alumni/alumnae and teaching staff, some of whom are also industrial or professional practitioners. The College responds effectively to external reports from the awarding body.

1.20 While for Health and Social Care students a work placement requirement is in operation and the College has taken steps to engage with industry practitioners, the review team found that it has had limited success to date in expanding or systematising its relationships (see also paragraph 2.16). This is a challenge of which the College is aware and is addressing: it is not one that threatens the maintenance of academic standards on programmes leading to Pearson Education awards. The team considers that the Expectation is met and the risk low.

Expectation: Met
Level of risk: Low

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

1.21 The College delivers programmes at Higher National Diploma level on behalf of Pearson Education, as well as a professional three-year Licentiate in Acupuncture which is provisionally accredited by the British Acupuncture Accreditation Board, and a postgraduate continuing professional development programme, both of which are out of the scope of this review.

1.22 The College discharges its responsibilities in an appropriate manner, drawing on external advice and support as well as the views of student representatives, and ensuring that its operational activities are aligned with all relevant external reference points. It has further work to do in engaging systematically and more extensively with employer interests, and in implementing periodic review - it is addressing both these matters. The College is cognisant of its responsibilities in respect of the programmes it offers on behalf of its awarding body, and competent to meet them. The team therefore concludes that the maintenance of the academic standards of awards at the College **meets** UK expectations.

2 Judgement: The quality of student learning opportunities

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

Quality Code, Chapter B1: Programme Design and Approval

Findings

2.1 Pearson Education, as the awarding body, is responsible for programme design and development: this includes determining syllabuses and programme structure. It is the College's responsibility to develop schemes of work based on these requirements, ensuring they are mapped to the learning outcomes of each unit.

2.2 As noted in paragraph 1.10, aspects of programme design and approval procedures are informal in character and, while fit for the purpose of monitoring current provision, would not be so in the event of programme expansion or increased organisational complexity. In particular, later in this report (see paragraph 3.4) attention is drawn to a lack of clarity as to the content of non-core modules, some of which are planned following recruitment, and in one case are negotiated with a small student cohort following programme commencement. The review team found this approach effective in fine-tuning a small programme to the needs of current students, who value it, but unlikely to be an appropriate basis for longer-term programme planning.

2.3 Accordingly, the review team, having reviewed the evidence and engaged in discussion with managers, teaching staff and student representatives, found the procedures for the design, development and approval of programmes effective given the current scale and complexity of operations, but that this approach would be inappropriate were the College to diversify programme provision, enter a contractual relationship with a second awarding body or become an awarding body itself.

2.4 This being so, while the Expectation is met, the team considers that the risk is moderate.

Expectation: Met
Level of risk: Moderate

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*

Findings

2.5 The College is responsible for the recruitment and selection of prospective students, while the Director of Studies oversees the process as a whole.

2.6 The ending of the College's Tier 4 status necessitated a shift of focus towards the domestic market: this posed challenges which the College acknowledged required addressing in the light of assessment results and overall feedback in the first year. The review team explored the admissions implications of the changed cohort, and found the College had implemented a rapid and significant shift in approach designed to meet the needs of, and challenges presented by, this very different intake.

2.7 The recently strengthened Recruitment Policy includes literacy and numeracy tests, standardised training for staff involved in interviews, an appeals system, and post-enrolment evaluation sheets to provide feedback on the process as a whole. The College has a Recognition of Prior Learning Policy (see paragraph 2.26), and mechanisms to address disability requirements and provide support for students with additional needs. It makes extensive information available online, and invites immediate feedback on the quality of information provided in the course of interviews. Students confirmed that the information received prior to interview was helpful and accurate.

2.8 The review team discussed admission arrangements with staff and students, and found that the revised process for applications has strengthened the recruitment process and ensured an improved quality of intake. This was demonstrated in the course of the review with figures showing significant improvements in retention rates across all but one subject area.

2.9 The review team found that staff approach student support in a holistic manner, using interviews to test the appropriateness of programme choice by prospective students, offering alternatives where these seem more appropriate to students' qualifications or career ambitions, and counselling out where necessary. The team confirms that these sensitive tasks, which include exploring whether candidates have any additional needs, appear to be undertaken in a professional and dispassionate but supportive way. It also confirms that the use of an informative and relevant Interview Checklist is designed to ensure that interviews are conducted consistently and fairly. The Expectation is therefore met and the risk 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

2.10 The College's current Strategy Statement refers to a people-based approach to students; its draft Teaching and Learning Policy explains the quality assurance procedures concerned, including internal and external verification, annual monitoring, the committee system and student involvement. In support of its commitment to high-quality teaching and support, the College operates a Teaching Observation Policy, annual appraisal system and Staff Development Policy. The review team learned from discussion that teaching staff have engaged with these policies, valuing the opportunities deriving therefrom for the dissemination of good practice and the development of new and improved teaching methodologies.

2.11 The College has recently undertaken a review of its management and committee structure, placing greater emphasis on higher education and investing heavily in forms of learning and pastoral support appropriate to a mature, academically low-prior-achievement, vocationally oriented student population. This includes halving the number of concurrent courses at key points in the programme, a strategic move necessarily accompanied by investing in more one-on-one tutorials and moving from a semester to a trimester-based academic year. The review team found this new structure, which derives from an active engagement with student opinion, reflects a strong and appropriate institutional engagement with the needs and expectations of a mixed student population.

2.12 Students are represented on all major committees: online training for representatives is available though not often used. All committees have formal terms of reference and report, directly or indirectly, to the Academic Board. The review team confirms that, given the nature of the student population, students participate to a realistic level in institutional quality management, and that the systems in place are fit for purpose.

2.13 The College operates an 'open-door' policy for students, uses survey and evaluation results to review and monitor programmes, and deploys tutorials and other classes to respond to queries and opinions. It cites with justification the restructuring and expansion of the tutorial system and the introduction of information technology workshops as strategic enhancements exemplifying its responsiveness to students' views.

2.14 The College aims to encourage independent learning by delivering contextual and critical modules, and by encouraging wide reading, individual study and the development of practical skills, critical thinking and independent research. The review team explored students' view of these objectives, finding that tutorial support, computing workshops and study groups offer opportunities to work in groups and develop computer literacy; that they collectively constitute a major improvement on the previous year's arrangements; and that the recently installed VLE has enhanced students' digital skills (which in some cases were previously minimal) and is viewed as an invaluable learning tool.

2.15 Students expressed qualified support for the sufficiency of learning resources: the review team found that information technology is provided to a level which is acceptable for a small College and adequate for most students. Some areas of library provision are limited,

and there is no borrowing facility. The College explained that it informs students of online resources, the research libraries available in London, and the expectation that some books must be purchased. Students confirmed the correctness of these claims, and that the College acknowledges the limitations of the Library, has been sympathetic to their comments and plans to improve it.

2.16 Students identified employability as the main area for development. They stated that they would welcome partnership arrangements with employers, arguing that guidance in this area would enhance the currency of their knowledge and skills, and improve their marketability. The review team learned from discussions with managers, staff and students that only limited employer input to programmes is in place, and that the College provides no systematic careers guidance. It does, however, embed a Personal and Professional Development module in its Higher National Diploma programmes and takes steps to ensure that students have exposure to learning around employability. It has also made efforts to engage with employers, and the team appreciates the challenges involved in doing so. Nevertheless, the team **recommends** that by September 2016 the College develop a strategic approach to employer engagement and career guidance.

2.17 The review team shares the view of students and staff that more systematic and strategic employer engagement is necessary to facilitate independent learning and employability, and considers that without such engagement a potential threat to future recruitment exists. This being so, while the Expectation is met, the risk is moderate.

Expectation: Met
Level of risk: Moderate

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

2.18 The College aims to tailor tutorial support to the needs of each student group: every new module begins with a session on unit content, followed a week or two later by an explanation of the assignment brief. As assignment deadlines approach, students are provided with one-to-one sessions to support them; they receive regular feedback, formative and summative; and all student progress is reviewed at regular programme team meetings and biannually at the Assessment Board. The review team discussed these arrangements with students, who stated they value the tutorial system and receive strong academic and pastoral support, with clear and detailed feedback to enhance their learning, and an open-door policy to assist them with their development. The College's rapid and coherent response to significant changes in its student population, providing academic and pastoral support which are both fit for purpose and highly valued, is **good practice**.

2.19 The College's recently developed VLE is available for use by full-time students and staff. The Teaching & Learning Committee is responsible for monitoring usage and evaluating effectiveness, supported by individual programme teams and comments from users.

2.20 The review team, having reviewed in documentary study and discussion the manner in which the College provides support from a strong and committed staff group and learning resources which are fit for purpose, found these arrangements contribute significantly to enabling students to achieve their potential. The Expectation is therefore met and the risk 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

2.21 The College states that it has been focusing over the last year on strengthening the quality and quantity of student involvement in quality assurance by means which include creative experimentation in encouraging student groups to discuss teaching quality and identify areas of difficulty. The review team found that staff of all levels take a positive approach to gathering student feedback and engaging with students. Students in turn confirmed that their views are taken seriously and that the College endeavours to make changes in line with their comments, and where this is not possible, it explains why, both formally in the minutes of Programme Meetings, which are both published and given to representatives for dissemination, and informally on request.

2.22 Students are represented on all relevant committees, including (on a rotational basis) the Academic Board. Students express satisfaction with the College's approach, including training, support and information. Representative training is now offered through an online programme designed to solve the problem of assembling all representatives. This has had mixed success, and the College has responded by offering face-to-face top-up training. Formal training is not a high priority for representatives (most of whom have other commitments and priorities), but the team found that current representatives are confident in their role, that effective, informal training is offered, and that help and advice are readily available. The Expectation is therefore met and the risk 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

2.23 In the case of programmes leading to the awards of Pearson Education, the awarding body specifies regulations and learning outcomes: assessment is therefore undertaken within this framework. The Principal and Director of Assessment jointly aim to ensure that the College exercises proper responsibility for the operational aspects of assessment, including Assessment Boards. The Principal, as Lead Internal Verifier, holds staff sessions on assessment, following them up with individual meetings with tutors to agree academic standards and the quality of written feedback. Tutors develop assignment briefs in conjunction with internal verifiers, whose approval is required before the briefs are issued to students. The review team discussed the operation of the internal verifier system with senior staff as well as teaching staff, and found that the College's processes are applied systematically and are highly valued by the latter.

2.24 The College describes the feedback provided on written work as both extensive and a contributor to improvement. It encourages students to submit written drafts for formative feedback: this is acceptable to the awarding body, has proved helpful in the wider development of good academic practice, and is regarded by students as a strong feature of the College's approach to learning. Students have a clear understanding of plagiarism. The College makes systematic use of an anti-plagiarism tool which is available to students prior to the point of submission. Standards verifier reports confirm that assessments are appropriate and rigorously conducted, and that they achieve an appropriate balance between practical skills and assuring appropriate academic standards.

2.25 While programme documentation requires an 85 per cent (or thereabouts) attendance rate, the College acknowledges that the policy, although firmly expressed, is in practice a target rather than a formal requirement, and that failure to meet it, while it may trigger a broader review of the progress of the student concerned, is not necessarily a disciplinary matter. The review team understands the College's reasoning, but it remains the case that clarification of the documentation would be beneficial.

2.26 The College's Recognition of Prior Learning Policy is guided by the awarding body and aligned with the Quality Code. It requires documentary evidence that materials previously studied meet the learning outcomes and curriculum of the excused modules. In practice, the policy has not been used.

2.27 The review team found that the College operates equitable, valid and reliable processes of assessment. The Expectation is met and the risk 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

2.28 The appointment, support and monitoring of standards verifiers are Pearson Education responsibilities. All standards verifiers visit the College at the end of each academic year to monitor assessments and academic standards, and their reports are considered by the College Assessment Board, which signs off all results before reporting them to the Academic Board. Programme teams respond to and act on standards verifier reports. The review team explored the reliability of current procedure, and found that the systems in place are effective. The Expectation is met and the risk 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

2.29 The College's internal annual programme monitoring includes internal and external verifier comments, module mark ranges, student feedback from module evaluations and matters from all relevant committees. The Academic Board is driving a process designed to achieve the systematic, institutional-level monitoring and review of all quality management activities to inform a College-wide approach to quality enhancement. It is complemented both by external reporting to Pearson Education as the awarding body and by regular discussion among senior staff which enables the achievement of a faster response than relying upon annual monitoring alone.

2.30 Annual programme monitoring is not yet fully embedded in quality management, as the College is developing an annual quality review procedure through self-assessment reports to be produced by each programme team and designed to inform a revised annual review procedure. Under this system, a Quality Improvement Plan will specify required actions for the following year which will be subject to regular review by the Academic Board. The review team learned from senior staff that the activities associated with annual review are currently underway, including gathering information on student achievement, progression and completion.

2.31 The College is similarly introducing a periodic review system. Senior staff reported that this is also underway, with the first review due to be undertaken in 2016. The review team found evidence of satisfactory planning and preparation for the first such review.

2.32 The review team considered the College's planned processes appropriate, and **affirms** the steps being taken to develop internal monitoring and periodic review procedures. The Expectation is met and the risk 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

2.33 The College has a lengthy and complex Complaints Policy and a newly developed and concise Academic Appeals Policy, which is available in student handbooks. These policies are, however, rarely if ever used in practice, since issues of concern are almost always resolved at a less formal level. In discussion with the review team, staff members took the view that this informal approach is appropriate to a small and engaged institution where issues are resolved quickly and informally, and students confirmed that they are confident that sufficient structures exist for both complaints and appeals to be dealt with in a timely and fair manner.

2.34 The review team found, first, that the Complaints Policy is unnecessarily detailed and complex for its intended audience. Second, the team noted that it is neither wholly accurate, in that, for example, it refers wrongly to the Public Sector Ombudsman, nor readily accessible, since no reference to it appears in the Student Handbook, the location students identified as the one to which they would turn for information. Third, notwithstanding the nature of the institution, the team takes the view that the Policy requires both revision and greater visibility, and was reassured to learn that a review is currently planned. The team **recommends** that by April 2016 the College ensures that its Complaints Policy is fit for purpose and effectively communicated.

2.35 Notwithstanding these limitations and given the nature of the institution, the review team accepts that, given its current size and character, the College is in practice able to deal with appeals and complaints, that its approach is fair and timely and that students are broadly aware of the procedures involved. In these circumstances the Expectation is met although the risk is moderate.

Expectation: Met
Level of risk: Moderate

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

2.36 The College does not manage higher education with other organisations.

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

2.37 The College has no research degree students.

The quality of student learning opportunities: Summary of findings

2.38 The College operates its quality management system under the aegis of Pearson Education as its awarding body: its own annual and periodic review process is in development and will become operational in 2016. The College highlights with justification its proactive approach to involving students in quality assurance and enhancement, and it has made imaginative attempts to secure the participation and engagement of a student body for which such engagement is not always a priority. Its student representation system is valued by students, and the College provided examples of the intervention of student representatives leading to improved provision.

2.39 The College claims that the quality of student learning is at the heart of its operations. The review team found ample evidence to support this claim, while noting also that its engagement with employers is limited and requires development, and that its Complaints Policy requires revision. Students submitting work for assessment receive extensive support both formatively (when they are encouraged to submit partially completed work for advice and discussion) and summatively, when the quality of markers' comments was found to be high. With the possible exception of the Library, where not all stocks are adequate and there are no borrowing rights, students speak well of the learning support provided.

2.40 The College has certain devolved admissions responsibilities where, following its adjustment to a different clientele following the ending of Tier 4 status, it implemented a rigorous approach to student selection, buttressed by a distinctive and appropriate evaluation system which has thus far succeeded in improving progression and completion rates. The review team therefore concludes that the quality of student learning opportunities at the College **meets** UK expectations.

3 Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1 The College provides information to students through its website and VLE, as well as in course handbooks, about which students spoke positively. The review team explored in particular how it plans to develop the use of its VLE, which it described as primarily an information source, learning that while some staff use it appropriately and creatively, others do so minimally if at all. The College, aware of this variability, is planning to embed usage by means of a training programme supplemented by monitoring and support for staff and student representatives, and to extend the environment's use to providing careers and employability advice. The team **affirms** the steps being taken towards ensuring that all teaching staff make appropriate use of the VLE.

3.2 The College's draft Communications Policy covers internal interactions between staff and students, and external interactions involving other stakeholders. The review team found the Policy thorough and well produced, though it has yet to be tested in practice. The team learned that staff considered it unlikely to have a significant impact on the day-to-day provision of information but that it would primarily constitute a codification of current practice.

3.3 The College made reference to an Information Updates Committee, charged with monitoring changes relevant to information and ensuring that all information is accessible and trustworthy. The review team learned, however, that these responsibilities fall to the management team, which discharges them generally adequately. When the team made reference to outdated references in current prospectuses, including Pearson module specifications and references to the Academic Infrastructure, it was told that this stemmed from timing problems in production, and that the new prospectuses will be up to date and accurate.

3.4 The review team noted that website information on modules is limited in scope, providing little information as to the content of elective modules and how they fit into the programme structure. Staff explained that this reflects both uncertainty as to the availability of lecturers and, on one programme in particular, the fact that a very small intake enables staff to negotiate non-core content with students. While current students expressed satisfaction with the arrangement because the modules reflected their interests, the College cannot assume that this will be so in future. The team **recommends** that by June 2016 the College provides more detailed information, both on its website and in handbooks, on the details of non-core units within its programmes.

3.5 The Expectation is met although the risk is moderate.

Expectation: Met
Level of risk: Moderate

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

3.6 The majority of the information provided by the College is fit for purpose, accessible and trustworthy, and considered to be so by its main users, the students. There are, however, a number of errors of detail which the systems in place have failed to detect or remove, and these should be rectified by a more systematic approach to monitoring and verification.

3.7 The College's VLE, while valued by users, has yet to be deployed optimally. Use varies considerably by staff member, and its interactive potential has yet to be fully exploited. Overall, however, no major problems or omissions were found. The team therefore concludes that the quality of the information about learning opportunities at the College **meets** UK expectations.

4 Judgement: The enhancement of student learning opportunities

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

Findings

4.1 The priorities for future development specified in the College Strategy Statement are firmly linked to the extension and enhancement of learning opportunities. They are supported by action plans and form the basis of the forthcoming Quality Improvement Plan (see paragraphs 1.17 and 2.30). Institutional priorities include increasing flexibility in modes and levels of study; achieving improvements in student recruitment, retention and progression; securing, in consequence, improved success rates; and providing an improved continuing professional development system for teaching staff, with particular reference to teaching and supporting mature students.

4.2 Over the past year, the College has adopted a systematic institutional-level approach to enhancement primarily by identifying the challenges associated with its changing student population and developing and rapidly implementing an approach designed to meet them. The review team found evidence of this approach from documentary study and in meetings with staff and students. The main evidence consists of revised admissions criteria and rigorous selection and advisory procedures to improve recruitment decisions; changes to the annual academic timetable and distribution of units through the teaching year; changes to learning approaches by adopting a more personalised approach to integrating theory and application; and revisions to the conduct of assessment to provide more formative feedback and support, while still maintaining academic standards. The effectiveness of these measures is found in significant improvements in student achievement and progression on almost all programmes.

4.3 The College encourages student involvement in enhancing the quality of learning opportunities through the programme team representation system (see paragraph 2.18), through participating in the student feedback system and engaging in a range of imaginative initiatives, some of which, the College acknowledges, have been more successful than others. Underlying all these initiatives is a strategic institutional-level drive to engage with students; to support, resource and pilot ideas produced by them; and to give them leadership roles in areas where they will not only enjoy success but also take responsible risks and learn to manage failure. This philosophy extends to training student representatives, where the representatives themselves are invited to choose their own training priorities, whether chairing meetings or taking minutes: when scheduling training proved difficult because of incompatible timetables, the College identified and purchased appropriate online training.

4.4 Students confirmed the positive nature of this engagement, including the attention the College pays to both formal and informal student feedback. The College's inclusive approach to involving students in the enhancement of their learning opportunities is **good practice**. The Expectation is met and the risk low.

Expectation: Met
Level of risk: Low

The enhancement of student learning opportunities: Summary of findings

4.5 The College's approach to enhancing students' learning opportunities includes increasing flexibility in modes and levels of study; achieving improvements in recruitment, retention and progression; and improving the skills of teaching staff in engaging with the current cohort of mainly mature and academically low-confidence students. It has revised its quality management system and committee structure to address the challenges presented by this different student population, and it makes bold and innovative use of the representation system to give responsibility to students and support their representatives in meeting their responsibilities. The team therefore concludes that the enhancement of student learning opportunities at the College **meets** UK expectations.

5 Commentary on the Theme: Student Involvement in Quality Assurance and Enhancement

Findings

5.1 The College tailors its provisions to the character and needs of a mature domestic intake lacking, on the whole, academic confidence or prior achievement, and with personal and family commitments which can easily detract from academic goals and career ambitions. This being so, the College takes the view that only by personalising the support it provides, and by responding to students' comments and suggestions, which may be conveyed privately and in confidence, can it maximise progression and completion rates, thereby enabling students to move into employment or further study. The review team noted the success of this approach, in that over the past year almost all programmes have seen significant improvements in progression rates, and students spoke warmly and gratefully about the support and learning they receive.

5.2 Students confirmed that their views are taken seriously, and that whenever possible the College responds positively to their comments. They are represented on all relevant committees, and representatives are offered training and support throughout. The high priority the College affords student involvement in quality assurance and enhancement is reflected in its strong commitment not only to the representation system, which, while functional, is not the main method of involvement, but also to continuing and often sensitive dialogue with students in classes (which are seldom large) and in one-on-one tutorials, which have pastoral as well as academic purpose.

5.3 The review team learned of significant changes to teaching methods and content made in response to such comments. Chief among these has been the halving of the number of modules taught concurrently at key points in the programme, a structural shift necessitating a change in the academic year from semesters to trimesters and a significant increase in the number of one-on-one tutorials provided - a costly innovation which the College has absorbed, and for which students expressed considerable gratitude.

5.4 Hence, while the nature of the student body, with its many competing priorities, both familial and financial, imposes limitations on the involvement of many of them in formal representative structures, the College has found imaginative and individualised ways of listening and responding to students' needs and aspirations. Indeed, the immediacy of its responses means that the representative system is seldom a vehicle for the provision of new information, but serves rather to formalise, codify and systematise an institutional response already made.

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 22 to 25 of the [Higher Education Review \(Alternative Providers\) handbook](#).

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

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

Academic standards

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

Award

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

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* (FHEQIS).

Good practice

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

Learning opportunities

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

Learning outcomes

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

Multiple awards

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

Operational definition

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

Programme (of study)

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

Programme specifications

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

Public information

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

Quality Code

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

Reference points

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

Learning that is delivered or supported through the use of technology.

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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