

Quality Review Visit of Itchen College

March 2017

Key findings

QAA's rounded judgements about Itchen College

The QAA review team formed the following rounded judgements about the higher education provision at Itchen College.

- **There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.**
- **There is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.**

Areas for development

The review team identified the following **areas for development** that have the potential to enhance quality and/or further secure the reliability and/or comparability of academic standards at Itchen College. The review team advises Itchen College to:

- strengthen the reporting structure to ensure fuller oversight of higher education provision and associated regulatory requirements (Code of Governance and Quality Code)
- further develop the arrangements for engaging students as partners in the quality assurance and enhancement of their experience (Quality Code)
- clarify and revise its terms and conditions to ensure that these fully align with the College's consumer protection obligations (Consumer Protection)
- clarify for students the relationship between the complaints policies of the College and awarding body, and the specific circumstances in which each policy applies (Student Protection).

The review team identified the following **specified improvements** that relate to matters that are already putting, or have the potential to put, quality and/or standards at risk. The review team recommends that Itchen College:

- ensure its complaints policy aligns with student protection measures as expressed in the baseline regulatory requirements (Student Protection)
- develop and formalise an internal policy and mechanism for protecting the student academic experience in the event of course closure and/or changes (Student Protection).

About this review

The review visit took place from 20 to 21 March 2017 and was conducted by a team of two reviewers, as follows:

- Miss Sophie Elliott (student reviewer)
- Dr Marie Stowell.

The overall aim of Quality Review Visit is to:

- provide the relevant funding body with an expert judgement about the readiness of a provider to enter, or continue to operate within, the higher education sector.

Quality Review Visit is designed to:

- ensure that the student interest is protected
- provide expert advice to ensure that the reputation of the UK higher education system is protected, including the protection of degree standards
- identify development areas that will help a provider to progress through a developmental period and be considered 'established'.

Each review visit considers a provider's arrangements against relevant aspects of the baseline regulatory requirements, and in particular:

- the reliability of degree standards and their reasonable comparability with standards set and achieved by other providers
- the quality of the student academic experience, including student outcomes where the provider has a track record of delivery of higher education.

About Itchen College

Itchen College (the College) is a small sixth form college based in Southampton, Hampshire that predominantly offers academic and vocational further education programmes to the local region. The College has approximately 1,500 further education students enrolled on programmes at level 1 to level 3. Over the last ten years, the College has also delivered higher education provision, including a foundation degree, which has since been discontinued. The current higher education provision consists of a level 5 and 6 in-service award in teacher training on which there are presently nine students enrolled (5.5 full-time equivalents).

The Professional Certificate in Education and Professional Graduate Certificate in Education (Life Long Learning) has been delivered at the College since 2008 under a partnership agreement with the University of Greenwich as the awarding body. This is a part-time, distance-learning programme operated as part of a University network of providers. The College forms part of a regional cluster of local colleges that also deliver the same teacher training awards in parallel. The distance learners enrolled on the programme study online and attend the College as a group once a month. Students are supported in practice by mentors and taught at the College by a sole tutor, who is also the Programme Coordinator.

Judgement area: Reliability and comparability of academic standards

The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ)

1 In terms of the current higher education provision, effective arrangements are in place for ensuring that academic standards meet UK threshold standards as set out in the FHEQ, and in relation to the Professional Standards for Teachers and Trainers set by the Education and Training Foundation. The programme is designed, developed and managed by the awarding body, which produces all definitive documentation, including programme and module/course specifications and student handbooks. There are robust programme approval and periodic review processes, together with annual monitoring procedures managed by the awarding body, which ensure the programme is aligned with the FHEQ.

2 The arrangements for ensuring that the academic standards of the programme are comparable with those of other UK providers are also directly managed by the awarding body. These include specified moderation and standardisation processes for the network of partners delivering the programme and the appointment of external examiners, who confirm that the programme continues to meet threshold academic standards.

3 The College's academic governance processes ensure that any concerns regarding academic standards raised by external examiners, the awarding body or through the College annual self-assessment process can be identified and referred to senior managers and the governing body within the College.

The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

4 The College governing body has considered the AoC Code of Good Governance, and with some minor clarifications, plans to adopt it by the end of the current academic year. The College's current instruments and articles of governance include reference to the principle of academic freedom. The College has a comprehensive risk management policy and strategy in place, with the audit subcommittee of the governing body responsible for monitoring risk. However, risks specifically associated with meeting the higher education baseline regulatory requirements have not been identified, considered or referred through the governing body committees (see paragraph 7).

5 Given the relative size of the higher education provision at the College and the limited nature of the responsibilities assigned to the College, the programme is subject to the same processes as further education and there are no specific higher education reporting structures in place. The departmental head has formal responsibility for oversight of higher education and changes in higher education policy and regulatory requirements, and reports to the Deputy Principal.

6 The recent external requirement for the governing body to provide assurances on quality through the HEFCE annual provider review process has raised the visibility of higher education provision at governing body level. In order to make this assurance on quality, the governing body was provided with the annual monitoring reports prepared by the Programme Coordinator for the awarding body.

7 The routine process for College oversight of programmes is through the self-assessment process. The departmental self-assessment report includes reference to the

higher education programme, and the curriculum, standards and quality subcommittee of the governing body is responsible for overseeing the process and outcomes of self-assessment. However, reference to higher education provision within the departmental report is limited in scope and does not provide sufficient information about higher education provision to allow specific oversight of quality and standards. The review team recommends that the College strengthen the reporting structure to ensure fuller oversight of higher education provision and associated regulatory requirements, identifying this as an **area for development**.

The Expectations of the UK Quality Code for Higher Education (the Quality Code)

8 In maintaining academic standards, the College operates within the arrangements specified in its Memorandum of Agreement with the awarding body and adheres to requirements in the Network College Handbook provided by the University. Link tutor reports confirm that awarding body processes are followed appropriately and that standards are calibrated with other partners within the network.

9 The College tests that students have achieved the academic standards set by the awarding body through the agreed assessment mechanisms, including use of the Professional Development Portfolio and joint observations by a work-based mentor and tutor. The use of internal moderation processes within the College, cross-network moderation within the regional cluster groups, and engagement with external examiner reports enables academic standards to be appropriately monitored. Assessment outcomes are monitored via external examiner reports and programme monitoring reports submitted to the awarding body. These reports inform the College self-assessment reporting process overseen by the governing body (see paragraph 7).

Rounded judgement

10 The academic standards of the current higher education programme are set by the awarding body and managed appropriately by the College through mechanisms established by the University through its network and external examining arrangements. Internal reporting structures are in place to enable the College to act should any issues be identified through these processes, although routine processes for reporting on the maintenance of academic standards in higher education programmes are currently limited. The review team therefore identifies an area for development to strengthen internal oversight of higher education provision.

11 The review team concludes that there can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.

Judgement area: Quality of the student academic experience

The Expectations of the UK Quality Code for Higher Education (the Quality Code)

12 The awarding body takes primary responsibility for ensuring that the quality of the student academic experience is subject to sound management and monitoring through formal policies and structures, in order to meet expectations of the Quality Code. Responsibilities are set out in the Memorandum of Agreement and include mechanisms for annual reporting and link tutor visits. The College and awarding body directly make available information to prospective and current students (see also paragraph 15).

13 Students, as distance learners, make little use of College learning resources, and the awarding body is regarded by students as the main provider of online teaching and learning resources, although full access to the College's resources is also provided. The awarding body also provides information and online training for work-based mentors. Students with whom the review team met, regard themselves as University of Greenwich students following a University programme, using University resources, and supported by a tutor employed by the College.

14 The College has a number of policies that, although explicitly related to further and adult education provision, support the College in meeting the expectations of the Quality Code. This includes a teaching, learning and assessment policy; a lesson observation policy; a quality improvement procedure; and a continuing professional development policy. Given the single tutor involved, and the level of engagement from the awarding body in supporting educational approaches, the current arrangements are sufficient. However, should the higher education provision at the College expand in the future, as indicated to the review team, a more systematic review of policies and procedures would be required to ensure the College aligns fully and explicitly with the Quality Code.

15 The College learner voice policy articulates mechanisms for obtaining student feedback on their experience, including collecting student feedback and holding course committee meetings with students. Students with whom the review team met, indicated high satisfaction with the Programme Coordinator and the awarding body in responding to issues raised through informal channels. A significant proportion of students, however, did not feel involved in improving the course or assessments. The extent to which students are formally engaged as partners in quality management, for example through receipt of formal feedback results and responses, consideration of external examiner and annual monitoring reports and/or involvement in quality improvement plans, is limited. Although small numbers and the distance learning nature of the programme may limit opportunities for such engagement, the review team recommends that the College to further develop the arrangements for engaging students as partners in the quality assurance and enhancement of their experience, identifying this as an **area for development**.

16 There are clear awarding body processes in place for annual monitoring and self-assessment. The programme annual monitoring report follows the awarding body template and draws on both a range of inputs to formulate actions for improvement. The link tutor visits conducted by the awarding body provide an opportunity for assessing strengths and areas for improvement. The College also has appropriate processes in place for annual monitoring and quality improvement through its self-assessment reporting, from programme to departmental and College levels. However, while the processes in place that relate to the awarding body are robust and result in clear quality enhancement actions for the programme, these do not sufficiently inform the reporting through the College structures,

in which higher education provision is nominally included. As in paragraph 7, the review team considers there to be scope for strengthening oversight of higher education provision through the College processes.

The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

17 Student governors from the further education provision represent the student body at governing-body level. This position is available to higher education students, but as part-time distance learners current students have not taken up this opportunity and it has not been widely promoted to students by staff. Higher education students have the opportunity to feedback on their academic experience during tutorials with the Programme Coordinator and through module feedback forms, both of which feed into the programme monitoring report.

18 Issues raised by higher education students are addressed informally in the first instance by the Programme Coordinator. A College overview report on formal student complaints is annually sent to the governing body. This report has only covered further education issues to date, as no formal complaints have been received from higher education students. The governance arrangements in place for further education provision provide an sufficient mechanism for oversight should complaints or welfare issues be formally raised by higher education students (although, see also paragraph 7).

Policies and procedures are in place to ensure consumer protection obligations are met (Competition and Markets Authority guidance)

19 The College and awarding body have a shared admissions approach, which is outlined clearly in the College enrolment policy. Students with whom the review team met gave a positive account of the information and guidance received when considering study at the College and considered themselves well equipped to make an informed decision about their studies.

20 The College provides information to prospective students via the College website and additional details specific to the programme are provided through an acceptance letter sent by the Programme Coordinator. The course handbook, which provides more detailed information, is made available to prospective candidates before they accept a place.

21 Detailed terms and conditions are provided by the awarding body, which students have to confirm they have read upon enrolment. The students are enrolled by both the awarding body and the College, with the latter providing a Learner Agreement setting out the College expectations of learners. The Learner Agreement is common to further and higher education students and has shortcomings as an appropriate set of terms and conditions in relation to the baseline regulatory guidance. For example, it is limited in scope and contains some non-applicable information only appropriate for further education learners. Although the terms and conditions from the awarding body provide a reasonable measure of student protection, these do not explicitly cover the terms and conditions between the students and the College. Although the College indicate it is aware of the published guidance on consumer protection obligations, it has no immediate plans to review current arrangements to ensure obligations are fully met. The review team recommends the College to clarify and revise its terms and conditions to ensure that these fully align with the College's consumer protection obligations. In light of the student protection measures in place through the awarding body, and the limited nature of the relationship between the College and the student, the review team identify this as an **area for development**.

Student protection measures as expressed through the Office of the Independent Adjudicator's (OIA) Good Practice Framework, the Parliamentary and Health Service Ombudsman's (PHSO) Principles of Good Administration, and HEFCE's Statement of Good Practice on Higher Education Course Changes and Closures

22 The student handbook indicates that students can make an appeal or complaint using the awarding body policies and procedures available on the University website. In addition, students can also use the College complaints policy to raise issues with the College. Although the review team was informed that the different policies are explained to students at induction, and advice is provided on request, the circumstances in which each policy applies is not explicitly documented. The review team identified a lack of clarity among the students and staff involved in the visit about which process to use in differing circumstances. The review team recommends that the College clarify for students the relationship between the complaints policies of the College and awarding body, and the circumstances in which each policy applies, identifying this as an **area for development**.

23 No formal complaints have been made by higher education students to date through either complaints policy. The College complaints policy encourages informal resolution in the first instance after which a formal process can be invoked by students. The College policy applies to all further and higher education students and has not been considered by the College in light of the baseline regulatory requirements. The review team noted some shortcomings in the policy in light of these requirements, particularly regarding timeliness, assurances of independence and making students aware of recourse to the OIA procedures following completion of the College process. Furthermore, the review team noted that the information provided on the College website regarding complaints is not consistent with the College complaints policy, and that the policy is not easily accessible to all stakeholders. The review team recommends that the College ensure its complaints policy aligns with student protection measures, identifying this a **specified improvement**.

24 The review team was informed that material changes to higher education programmes would only apply to future cohorts, and that no changes are made to programmes in-year. In the event of a course closure, other colleges within the network would be approached to take over delivery, although this arrangement is not formalised in internal College documentation. The responsibilities of the College in dealing with such risks are outlined in the Memorandum of Agreement with the awarding body. Although the College internal risk management arrangements provide a sound reactive mechanism for identifying and addressing closure issues should such circumstances arise, the College approach to managing potential closure has not been explicitly considered against the principles in the baseline regulatory requirements and the College does not have plans to address this area. The review team therefore recommends that the College develop and formalise an internal policy and mechanism for protecting the student academic experience in the event of course closure and/or changes, identifying this as a **specified improvement**.

Rounded judgement

25 The review team considers that the College enacts its responsibilities under the arrangement with the awarding body appropriately and reporting mechanisms to the awarding body on the student academic experience are sound. Internal College processes, policies and reporting mechanisms for higher education provision are predominantly geared towards further education programmes. While the application and use of these policies and mechanisms for higher education provision are limited due to the nature of the programme delivered, the fitness for purpose of these arrangements has not been fully considered in light of the key reference points for higher education providers represented in the baseline regulatory requirements.

26 Although the potential risks are partially mitigated by the relatively limited nature of the College responsibilities for its higher education provision, and by the safeguards and oversight inherent in the awarding body procedures, the review team considers that the College does not demonstrate sufficient awareness of its responsibilities as a higher education provider for aligning with the baseline regulatory requirements. It therefore makes two recommendations for specified improvements to ensure that the College explicitly considers its current policies and procedures in light of its student protection obligations and student protection measures. The review team also advises the College on two areas for development with regards to student engagement and the clarity of complaints information.

27 The review team concludes that there is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.

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