



Higher Education Review (Alternative Providers) of Kaplan Financial Ltd

May 2016

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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 Kaplan Financial Ltd. The review took place from 24 to 26 May 2016 and was conducted by a team of four reviewers, as follows:

- Dr David Houlston
- Dr Julie Andreshak-Behrman
- Mr Gary Hargreaves
- Mrs Sala Banda-Khulumula (student reviewer).

The main purpose of the review was to investigate the higher education provided by Kaplan Financial Ltd and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the [UK Quality Code for Higher Education](#) (the Quality Code)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 maintenance of academic standards
 - the quality of student learning opportunities
 - the information provided about higher education provision
 - the enhancement of student learning opportunities
- provides a commentary on the selected theme
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

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

In reviewing Kaplan Financial Ltd the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland. The [themes](#) for the academic year 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.

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 8.

The QAA website gives more information [about QAA](#) and its mission.³ A dedicated section explains the method for [Higher Education Review \(Alternative Providers\)](#).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/Educational-Oversight.aspx.

Key findings

QAA's judgements about Kaplan Financial Ltd

The QAA review team formed the following judgements about the higher education provision at Kaplan Financial Ltd.

- The maintenance of the academic standards of awards on behalf of its awarding organisations **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 Kaplan Financial Ltd.

- The effectiveness of Kaplan Training Academy's support and development for new staff across all centres (Expectation B3).

Recommendations

The QAA review team makes the following **recommendations** to Kaplan Financial Ltd.

By September 2016:

- develop and implement an appropriate teaching and learning strategy to enhance the quality of academic delivery and the student learning experience (Expectations B3 and Enhancement)
- establish a process to build upon the existing student feedback procedures on all delivery channels (Expectation B5)
- develop a robust internal moderation process to enable students to achieve the intended learning outcomes for the credit or qualification being sought (Expectation B6)
- develop and implement a formal process to ensure regular and systematic monitoring and review of all programmes of study across all centres (Expectation B8)
- strengthen the organisational engagement with the Quality Code to enhance the quality of student learning opportunities (Expectation Enhancement).

Affirmation of action being taken

The QAA review team **affirms** the following action that Kaplan Financial Ltd is already taking to make academic standards secure and improve the educational provision offered to its students.

- The deliberate steps being taken to identify 'at-risk' students using relevant data (Expectation B4).

Theme: Student Employability

The majority of students who have elected to study through Kaplan Financial Ltd (KFL) are part-time and pursuing professional qualifications in accountancy and finance. They are

normally employed or sponsored by an employer. Some of these employers are the commercial clients of KFL and provide work-based training contracts for their learners as defined by the awarding body.

Financial sustainability, management and governance

Kaplan Financial Ltd has satisfactorily completed the financial sustainability, management and governance check.

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

About Kaplan Financial Ltd

The Kaplan UK Group is part of Kaplan, Inc, one of the world's largest private education companies, owned by Graham Holdings Company. Kaplan annually provides education and career services to approximately 1 million students in 600 locations in 30 countries worldwide.

Kaplan's mission is 'to help individuals achieve their educational and career goals. Kaplan builds futures, one success story at a time'.

Kaplan Financial Ltd offers flexible training programmes leading to professional exams of numerous professional bodies, significantly:

- The Association of Accounting Technicians (AAT)
- The Association of Chartered Certified Accountants (ACCA)
- The Chartered Institute of Management Accountants (CIMA)
- The Institute of Chartered Accountants in England and Wales (ICAEW).

Kaplan Financial Ltd is accredited by each of the above awarding and professional bodies and is listed on each professional body's website as an approved partner in learning. To receive and maintain accreditation from these professional bodies, Kaplan must meet and maintain the criteria established by AAT, ACCA, CIMA and ICAEW.

The awarding and professional bodies that Kaplan Financial Ltd works with have their own quality assurance and compliance systems. Quality assurance mechanisms employed by the professional bodies include annual self-reporting against set indicators, audit visits, inspection reports and student feedback surveys. Entry requirements for students are set by the relevant professional body.

After registering with their chosen professional body, the majority of students then enrol for tuition and support with an accredited training provider, for example Kaplan Financial Ltd. However, it is important to note that if a student chooses to study with Kaplan, there is no obligation to remain with Kaplan Financial Ltd for the duration of their studies and the student can choose to change the mode of study or training provider at any point.

Client-sponsored students (those who have their studies paid for by the employer) are employed by a wide variety of organisations. The client list includes, for example: PwC, Ernst & Young, Deloitte, Imperial Tobacco, Ageas, and B&Q.

To ensure clarity of responsibility, the level of service specification agreed with these clients is documented in a service-level agreement.

On passing the required exams, a student becomes a member of the relevant professional body, and each award carries a specific designation; for example, the ICAEW confers the designation ACA.

Kaplan Financial Ltd also delivers vocational courses via Skills Funding Agency (SFA) programmes that, when combined, represent approximately 11 per cent of revenue. For the purposes of this review only AAT delivery at Level 4 will be considered as all other vocational delivery is at Level 3 or below. All SFA-funded programmes are subject to Ofsted inspection. Kaplan's inspection was completed on 11 December 2015.

During 2015, Kaplan Financial Ltd supported approximately 45,000 students. The documentation provided focuses on AAT, ACCA, CIMA and ICAEW as together they represent 88 per cent of Kaplan's programmes.

Kaplan Financial Ltd offers courses to both domestic (99 per cent) and international (1 per cent) students. Since August 2015 Kaplan has ceased accepting new tier 4 applications. The existing 462 international students continue to be supported.

Kaplan Financial Ltd operates in a dynamic and constantly changing environment, and is committed to embracing change and to continuously driving forward improvements in all areas of activity. Recent developments include the creation of a formal learning strategy.

Kaplan Financial Ltd aims to provide effective and flexible training solutions which respond to the demands of students and employers. The purpose is to deliver a variety of training options, all of which provide an outstanding student experience and prepare students in the best way possible for the exams of their chosen professional or awarding body.

Everyone at Kaplan Financial Ltd shares a common goal, which is student success. The Kaplan Way captures this common goal and translates it into four key principles: Student Success - putting the student first, enabling the most direct path to results that matter; Continuous Transformation - to innovate, measure and advance how Kaplan educate students; A Great Place - enabling Kaplan Financial Ltd teams to engage in work with energy and enthusiasm; and Shared Values - acting with integrity and upholding Kaplan Financial Ltd values.

Kaplan Financial Ltd's core values define the company culture and provide the framework for its delivery to its students and employees each day. These are the values of Integrity, Knowledge, Support, Opportunity and Results.

The Senior Leadership Team (SLT) is led by the Chief Executive. The SLT is responsible for strategic planning, resources and the development and fitness for purpose of the programme portfolio. The SLT agrees the annual budgets for business divisions and centrally provided services and facilities, monitors their implementation and fosters good management practice across the organisation. The SLT has executive and governance responsibility for human resources, financial status, physical resources and the overall academic portfolio including standards, strategic direction/objectives and performance monitoring. Strategic direction and organisation objectives are communicated via the quarterly business updates.

In 2014 the SLT commissioned a review of the learning landscape, the outcome of which was the learning strategy. The learning strategy provides high-level guidance to the SLT to help with long-term product development, the application of new technologies and in identifying areas that may require investment to drive future innovation.

The Kaplan Accountancy Product Board, established in late 2011, is chaired by the Director of Accountancy Product and reports to the SLT. Its objective is to develop and maintain

product strategy in line with business objectives, customer needs and innovations in learning and education. This includes reviewing and approving major changes to products, generating ideas for meeting student and other customer needs and, where appropriate, commissioning research to better understand those needs.

Kaplan Financial Ltd's Head of Learning takes responsibility for the delivery and ongoing development of the learning strategy. The Head of Learning provides insight and guidance to the Product Board and ensures they are up to date with educational trends and new technological developments that impact learning. This ensures the Product Board can further enhance the value provided to students.

National Product teams, reporting to the Director of Accountancy Product, develop appropriate programmes of study to meet the needs of students and clients. The Product Managers within these teams are responsible for ensuring the programme is fit for purpose and delivered consistently in all centres. Product Managers liaise with the relevant professional body as well as marketing, IT and the tutor teams to achieve their objectives. Product Managers are appraised on a variety of factors including measurements of student success. A summary of the Key Performance Indicators used to measure the success of the National Product teams includes percentages of students accessing online recordings, pass rates and prize winners.

Kaplan Financial Ltd has 21 centres around the UK offering accountancy and tax programmes. Each centre has a manager who is responsible for the student experience as well as the financial performance of the centre. Each Centre Manager is also responsible for ensuring all courses offered from their centre follow National Product requirements. This involves following designated teaching programmes and standard course durations and using specified learning materials. The structure of each centre varies depending on its size; however, regardless of size or structure, the same quality assurance processes apply to all centres.

Central services located in central London include Finance, IT, Facilities, Compliance and Human Resources. Marketing is product-specific. The marketing team based in Manchester is responsible for AAT, ACCA, CIMA and ICAEW.

Kaplan Financial Ltd employs 809 staff, of which 80 per cent are full-time. Staff are encouraged to integrate responsible business and personal practice throughout the organisation. The in-house social responsibility programme, Building a Brighter Future, reflects the core values and improves communications to staff to ensure they understand the role they play. The three key pillars of the programme are: environment, volunteering and fundraising.

For students studying for a professional qualification, the methods of delivery are varied and flexible, ranging from daytime, evening and weekend classroom delivery to live (synchronous) and on-demand (asynchronous) online delivery, distance learning and any combination of methods when a blended solution is required.

A large proportion of students studying with Kaplan Financial Ltd are in employment and are financially supported (sponsored) by their employers; courses are therefore tailored to the demands of working students. The aim is to provide a supportive environment that is accessible to the student during evenings and weekends and via online forums.

Regardless of the programme of study, Kaplan Financial Ltd provides dedicated support through every step of each student's journey with access to quality learning materials and experienced tutors.

Explanation of the findings about Kaplan Financial Ltd

This section explains the review findings in more detail.

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

1 Judgement: The maintenance of the academic standards of awards offered on behalf of 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 As an accredited training provider, Kaplan Financial Limited (KFL) delivers educational products in accountancy and finance on behalf of a range of professional awarding organisations. In so doing, it adopts and conforms to the academic standards and quality procedures of these organisations. The programme specifications, learning outcomes and alignment with Subject Benchmark Statements for these professional qualifications are defined by the respective awarding organisation.

1.2 Annual re-accreditation of KFL's delivery of programmes of study was conducted by the awarding organisations. It was unclear from the evidence provided by some of the awarding organisations and through discussion with KFL staff how this accreditation process monitored and evaluated the delivery of academic standards by KFL.

1.3 The team met representatives from the awarding organisations, employers, students and staff, and reviewed documents such as the QAA Responsibility Checklist and external verifier reports.

1.4 The conclusion of the review team is that the engagement with appropriate academic standards and learning outcomes meets the requirements of the awarding organisations. Therefore the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.5 Executive responsibility for the academic governance of programmes delivered by KFL resides with the Senior Leadership Team. Corporate oversight of the delivery of academic standards and quality is devolved to the Product Board, which oversees KFL's academic provision through a Product Team for each programme. Product Team Managers are members of the Product Board and engage in regular communication with Centre Managers at each of the KFL regional delivery centres.

1.6 Each of the professional awards delivered by KFL is managed by a Product Team that monitors and evaluates student progression and initiates improvements to the student learning experience. The Product Manager for each of the academic programmes liaises with the respective awarding organisation and the KFL Centre Managers to ensure adherence to the regulatory framework governing the programme.

1.7 Additional scrutiny of KFL's programme governance and learning materials is undertaken annually by some of the awarding organisations. It was uncertain from documentation and discussion with senior and academic staff how the KFL framework for academic governance provides routine monitoring of the parity and consistency of academic standards across regional centres.

1.8 Appropriate staff development and training to secure the standard of academic delivery was managed through the Kaplan Tutor Academy (KTA). The KTA provides training programmes to ensure KFL's tutors are familiar with any changes to awarding organisation syllabi and are competent in using a range of teaching and learning approaches and media.

1.9 The team met representatives from the awarding organisations, employers, students and staff, and reviewed documents such as the QAA Responsibility Checklist and external verifier reports.

1.10 The conclusion of the review team is that the engagement with appropriate academic standards and learning outcomes meets the requirements of the awarding organisations and therefore the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.11 The awarding organisations have responsibility for maintaining a definitive record of their programme qualifications, and against QAA requirements, for example Subject Benchmark Statements and the FHEQ.

1.12 As programmes are designed by the awarding organisations, KFL's role is to ensure that implementation of these pre-designed programmes is delivered in such a way as to maximise student potential. There is a good deal of emphasis on providing training and support to students to provide the best possible outcome in their examinations. Student success is highly important, as the awarding institutes lead and set examinations, and KFI's role is that of a commercial driver, with the primary operational objective of monitoring programme operation that is key to quality assurance processes. The combination of the awarding institutes and KFI's responsibilities, and their close cooperation, with Kaplan's oversight sets effective parameters for the reliability of the provision of academic governance and assessment regulations.

1.13 The introduction of the Kaplan Learning Strategy is considered a strength by KFI, and its stated intention is to provide an environment and culture so that '[a]ll key staff will demonstrate competency and knowledge of the practical application of learning and are conversant with all key technologies used in the classroom'. However, in practice and following further discussion with staff, it is clear that this current Learning Strategy does not yet have pedagogical basis. It provides more of a business and mission strategy, and an insight into the learning landscape with the strategic aim to achieve KFI's business objectives, and be responsive to the demands of its clients, either as employers or students, and to the commercial aims of the Kaplan business.

1.14 Notwithstanding the limitations of the current Learning Strategy, there has been extensive work on a detailed draft Teaching and Learning Strategy that has been in development for over a year, and this is firmly rooted in pedagogy and relates to currency in teaching and learning practice, including acknowledging and referencing external reference points, for example the Quality Code and Expectations (for example, B3, B4, B5 and B6). Further, this draft document aims to underpin KFI's approach to teaching and learning, and ensure faculty staff are both technically and pedagogically strong, and maintain quality and consistency across all programmes.

1.15 In practice, KFI relies heavily on the awarding organisations for policies and procedures, with an internal organisational structure that has effective oversight of the quality of the management of the provision, across the many UK centres. Kaplan-delivered products are monitored by quality mechanisms outlined in the Quality Oversight Flowchart, although in practice oversight is at local or regional level, with more overt oversight that is outcome-based (exam results) by KFI's Product Managers, who look after a specific awarding organisation. For example, the exam results are analysed for strengths, trends and weaknesses; these are further supported by internal centre board reports, and responses to centre visits by the external visiting organisations. Kaplan uses client and student feedback as part of enhanced monitoring of quality.

1.16 Each centre also takes complaints very seriously and has appointed a Complaints Officer who is independent, and has a clear mandate to 'provide unbiased resolution to the complainant'. The complaints policy was updated in October 2015. The complaints log shows an active and timely responsive commitment and to a range of complaints with four formal complaints of 24 in the last academic year to date. Appeals are dealt with directly by students with the awarding organisations, although the Complaint Officer indicated that wherever possible they will guide and support students.

1.17 The Expectation is met and with low risk. The awarding organisations are continually monitoring their programmes with close consultation with their delivery partners and with clients, ensuring that there is a complete and definitive record of each of the programme qualifications, and that the delivery is clearly understood and implemented by Kaplan, with careful monitoring both external and internal, and compliant with expectations.

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

1.18 As Kaplan does not have degree awarding powers, it is reliant on the validation requirements of its awarding organisations, who are responsible for the programme approval changes and developments.

1.19 KFL does not have direct involvement with approval and programme design as this is the responsibility of their awarding organisations. However, it is clear that staff, students and employers are consulted through the provision of awarding organisations' forums for students, and annual conferences, and updated for providers. In addition, employers and awarding organisations confirmed that they had regular contact, and this included consultation on programme development and assessment methodologies. For example, the introduction of online testing and the future of assessment on demand have currently been under much discussion by all stakeholders.

1.20 The awarding organisations are responsible for ensuring and confirming that they meet the external and threshold standards of the FHEQ and Subject Benchmark Statements, and reviewers examined and discussed these with the awarding institutes. They are also evident on their websites. Further, the review team was able to confirm that the role of the Senior Executive and Product Teams was in place to validate and ensure there were sufficient resources in place to deliver programmes, modules and in their centres.

1.21 In practice, it is the effectiveness of the monitoring and oversight by KFL of tutor profiles, course profiles, Gemba boards and Product Boards, and the stringent requirements of the awarding organisations, that ensure there is prerequisite validation of delivery of these programmes, and that they are sufficiently aligned to the awarding organisations' expectations, including physical and staffing resources.

1.22 The conclusion of the review team is that KFL's engagement with awarding organisations in terms of programme approval meets the requirements of the awarding organisations and therefore the Expectation is met and the 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

1.23 KFL is not a degree-awarding body. KFL works with four awarding organisations for the majority (88 per cent) of its qualifications: AAT, ACCA, CIMA and ICAEW. As a result, the assessment of the achievement of learning outcomes is primarily the responsibility of the awarding organisations.

1.24 KFL is responsible for administering the examinations to the specifications of each of the awarding organisations. KFL is wholly responsible for preparing students for the examinations and follows up on an individual basis with students who have not been successful in their examinations.

1.25 KFL has no role in setting the assessments, although the overall design of new qualifications or amendments to current qualifications and units can be suggested by KFL staff in an organic way. The KFL team works in close partnership with its awarding organisations and the employers who sponsor the majority of its students. Both of these stakeholder groups noted that the key relationships between them and KFL (in the form of Product Managers) were the major contributing factor to the success of these partnerships.

1.26 Changes to the curriculum or assessment are carefully managed by each Product Team and disseminated to KFL tutors via a weekly email.

1.27 Centre Managers are responsible for ensuring that the courses offered meet National Product requirements, including using approved materials and teaching programmes.

1.28 The pass rates achieved on the various programmes are a measure of the successful management of the assessment process.

1.29 The team met representatives from the awarding organisations, employers, students and staff, and reviewed documents such as the QAA Responsibility Checklist and external verifier reports.

1.30 The conclusion of the review team is that the engagement with appropriate academic standards and learning outcomes meets the requirements of the awarding organisations and therefore the Expectation is met and the 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

1.31 The awarding organisations with which KFL works are responsible for addressing the UK threshold academic standards and for monitoring and reviewing KFL's role in maintaining these standards.

1.32 KFL is an approved partner, accredited by each awarding organisation to deliver specific courses. Each awarding organisation employs different mechanisms to assure quality of provision at KFL centres. These approaches include self-reporting against set indicators, audit visits, inspection reports and study feedback surveys.

1.33 The review team met employers, representatives from awarding organisations, students and staff, reviewed centre accreditation documentation, and accessed the reports that some of the organisations provide.

1.34 Each of the awarding organisations maintains a different cycle of visits and reporting. KFL is consistently cooperative and compliant with the review processes for which it is responsible and takes forward recommendations as required.

1.35 The conclusion of the review team is that the academic standards required by the awarding organisations are being maintained and therefore the Expectation is met and the 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

1.36 The design, content and assessment of academic programmes delivered by KFL are defined by the respective professional awarding organisations. The team found that some of these organisations undertook annual re-approval of the KFL provision through a sampling survey of KFL centres. Awarding organisation representatives reviewed programme outcomes and attainment levels with KFL Product Managers and tutors. One awarding organisation provided more formal verification of academic standards and quality.

1.37 Through service-level agreements of quality assurance responsibilities with each awarding organisation, KFL contributes to annual programme review and examination board meetings held by each of the organisations.

1.38 An online portal is used to ensure the awarding organisation is able to monitor student performance and discuss any additional support needs with KFL.

1.39 The conclusion of the review team is that the academic standards required by the awarding organisations are being maintained and therefore the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

The maintenance of the academic standards of awards offered on behalf of awarding organisations: Summary of findings

1.40 In reaching its judgement about the maintenance of academic standards, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

1.41 Kaplan Financial Ltd effectively uses the processes of its awarding organisations in ensuring that academic standards are maintained in line with the relevant level of the FHEQ and external reference points.

1.42 Kaplan Financial Ltd has met all seven Expectations in this area and the associated level of risk is low. Therefore, the review team concludes that the maintenance of the academic standards of awards offered on behalf of awarding organisations at Kaplan Financial Ltd **meets** UK expectations.

2 Judgement: The quality of student learning opportunities

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

Quality Code, Chapter B1: Programme Design, Development and Approval

Findings

2.1 Each centre has little control over programme design, although there are opportunities to engage with awarding institutes through regular meetings.

2.2 KFL has no direct responsibility for programme design, development or approval. However, it does have a principal role in developing, monitoring and auditing teaching, and this includes 'enhanced' formative assessment.

2.3 Some staff have an awareness of their awarding organisation's approval requirements, for example Subject Benchmark Statements, the FHEQ or the Quality Code. Students play no part in any new programme design, although they are very well informed about any planned changes, and this was evident during the visit, for example changes to tax arrangements. Information is communicated very quickly to staff and students, minimising any potential deleterious impact on examination success, with supporting additional input to programme delivery.

2.4 In practice, the processes of design and approval have an impact only in terms of the awarding organisations' requirements that delivery and preparation for assessment is well prepared, and in line with their requirements. The awarding organisations' confidence in KFL is recognised in the prestige awarded by the organisations and is also reflected in the high pass rates achieved by students.

2.5 The Expectation is met and the risk is low as each centre has no direct responsibility for programme design, development or approval.

Expectation: Met
Level of risk: Low

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

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

Findings

2.6 The awarding organisations are responsible for recruitment and KFL is responsible for the enrolment of students. The Learning Journey Catalogue defines each part of the learning journey including admissions; it shows that the Product and Quality Improvement Team are in charge of enrolment.

2.7 For AAT students, recruitment and admissions are a shared responsibility with online self-enrolment for UK classroom students and a separate enrolment process for students under Government Apprenticeship or Advanced Learning Loan schemes, with open entry to all provided AAT and UKBA rules are met. KFL also provides a progression path for students on the Level 4 AAT course with 30 per cent choosing to progress onto a higher qualification and the centres are involved in the recognition of prior learning for potential students.

2.8 For ACCA and CIMA students, recruitment and admissions is a shared responsibility with online self-enrolment for UK classroom students and an enrolment form for ACCA overseas students. Open entry to all provided ACCA, CIMA and UKBA rules are met.

2.9 For ICAEW, student recruitment is the shared responsibility with employers arranging student recruitment with course/study information online; admission is also a shared responsibility as most are sponsored and enrolled by employers via enrolment forms with open entry to all provided ICAEW rules are met.

2.10 KFL has two types of students. The first type register in the first instance with their chosen professional body who set the entry requirements; then they enrol with KFL for tuition and support as an accredited training provider. The second type are client-sponsored students - those who have their studies paid for by the employer.

2.11 Employers are mostly responsible for their own trainee recruitment and KFL provides independent advice to students on the suitability of programmes through the Customer Support Team with online expert advice.

2.12 Information for the programmes is found online with students enrolling online or by phone where they can choose their Kaplan centre and mode of study. Each centre management is responsible for their local students.

2.13 Students are given a welcome brochure, which is an online document that provides students with relevant and useful information about their centre and the available resources and services.

2.14 KFL works closely with employers and awarding organisations to align with its recruitment drive. It has in place appropriate structures and procedures within the admissions and recruitment process focusing on the enrolment process. These processes and procedures would allow the Expectation to be met.

2.15 The team looked at the previous admissions policy, current enrolment forms, student numbers in different channels, client lists and the responsibilities checklists, and reviewed during the visit the College's responsibilities with its awarding organisations. The team met centre managers, senior staff, support staff and students to further investigate the robustness of the enrolment procedure. The team also had an enrolment demonstration that gave further insight into how students enrol for a programme.

2.16 Staff confirmed that there is currently no admissions policy in place but rather an enrolment procedure as the recruitment and admissions onto a program is carried out by the relevant awarding body; KFL only intervenes if further information is required. Students concurred that they were recruited and admitted on the course via the relevant awarding organisation and then enrolled online with KFL. KFL works closely with employers who are a key part of the recruitment drive; as part of this blended approach to recruitment, each centre ensures it meets its commercially driven targets with employers.

2.17 A majority of students enrol online following the online enrolment guidelines; first they select and pay for the programme (classroom/online/distance learning); this then allows them to proceed with the enrolment process. Course information available online includes tutor support, timetables and payment plans. Students then select their paper, exam date and centre, and then are given a variety of options in payments that may include applying for funding (only available for AAT students) and an internal payment plan.

2.18 Students receive instant access to the programme within 24 hours and are also given a 24-hour cooling-off period; this automated response is applicable for all programmes except ICAEW that will go live in June 2016. KFL gathers information on enrolment from all centres to ensure consistency in approach.

2.19 Students are encouraged to disclose any special needs and to check the suitability of the centre, others specify any additional needs on the hard copy of the enrolment form, and all centres are Disability Discrimination Act-compliant to cater to student needs. Hardcopy enrolment is only used as a backup if students are unable to enrol online. KFL emails the student a PDF link/document that they can download and send via post/online and a provision is made for students to disclose any special needs requirements. Students who only use the centres for exams are also given the opportunity to disclose if they need additional exam support. When identified, the Customer Support Team will contact the student to make appropriate arrangements.

2.20 There is a lack of consistency in identifying students who need additional support and the disclosure of equal opportunity at the enrolment phase online; this is only picked up using the hardcopy. KFL is looking to add this in future within the welcoming email and currently have a draft Code of Practice for Reasonable Adjustment in place.

2.21 All students receive induction depending on the product and type of student; induction is done onsite for AAT and online for the other programmes. Students are introduced to MyKaplan and informed of assessment criteria and the lifetime guarantee programme; they are also directed towards relevant policies and procedures and student support.

2.22 KFL has in place an appropriate enrolment process as defined by the responsibilities checklists with the awarding organisations. It is also taking deliberate steps to ensure the availability of relevant policies such as the reasonable adjustments policy to complement the enrolment process. The team therefore concludes that the Expectation has been met with low risk.

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

2.23 A KFL Learning Strategy was introduced in 2015 to provide executive guidance on the development of learning approaches and technologies, and to support changes in the study requirements and expectations of learners. Alongside more formal teaching situations, the strategy identifies the growing need for personalised learning and performance monitoring, alongside the demands for informal and social learning opportunities, and the employment of innovative and interactive learning technologies. Feedback from corporate clients complemented the flexibility of KFL's provision. During the visit, the team was informed of an accompanying Teaching & Learning Strategy that was being designed to enhance the quality of academic delivery and the student learning experience. The team **recommends** that KFL develops and implements an appropriate teaching and learning strategy to enhance the quality of academic delivery and student learning.

2.24 There is a planned and gradual transition away from direct classroom teaching to more informal and online learning, although the majority of study involves formal teaching situations supported by distance-learning provision. The MyKaplan virtual learning environment (VLE) supports online learning and an enhanced VLE is scheduled to facilitate the move towards a greater proportion of online and flexible learning opportunities for all programmes by 2017.

2.25 Programme tutors are recruited through KFL regional centres and follow a prescribed approval process that ensures they are suitably qualified. Subsequent training and development is provided by the Kaplan Tutor Academy (KTA) and new tutors follow an induction programme and receive mentored support. All tutors are observed annually in classroom and online teaching situations, and remedial action is assigned through the KTA if there are concerns over teaching competence. It was not clear to the review team how effectively KFL monitored the extent of staff engagement with KTA training provision.

2.26 Programmes are delivered across the UK through KFL's regional sites, and Centre Managers review student feedback on tutor performances. KFL uses an in-house customer survey to collect student feedback and there was general satisfaction with KFL's teaching and learning provision in 2015-16. KFL has acknowledged that improvements can be made in the provision of technical service support during weekends. The recent introduction of an annual 'You said, we did' review has improved Kaplan's responsiveness to student issues and queries, most of which are related to accessibility of resources and technological service or support difficulties.

2.27 The provision of learning resources is a shared responsibility between the awarding organisation and KFL. Annual approval of a sample of KFL centres by awarding organisations considers the effectiveness of learning provision. This re-approval process does not include routine comment on the quality of the learning environment. KFL received premier status from one of the awarding organisations for the quality of its learning provision. Monthly reports to the Product Board from Centre Managers indicate regional oversight of facility provision and requests for additional resources beyond the budgeted expenditure follow a prescribed KFL procedure.

2.28 The team considers the effectiveness of Kaplan Training Academy's support and development for new staff across all centres as **good practice** and concludes that the Expectation has been met with low risk.

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

2.29 The recent implementation of a corporate Learning Strategy provides a consistent framework for the achievement of student success, linking enhancements in teaching and learning approaches to resource provision across KFL's regional centres.

2.30 Students select KFL as their accredited training agency of choice, primarily due to the success rate and the quality of the student experience. Student performance is monitored regularly and, where appropriate, shared with the respective awarding organisation and sponsoring company. An annual report of student progress and attainment is provided for all of the awarding organisations.

2.31 Product Managers liaise with awarding organisations and KFL's regional centres to ensure the consistency of programme delivery, and are appraised on the success of students in each of the professional study programmes. In cooperation with Product Managers, the managers of KFL's regional delivery centres are responsible for overseeing the student experience and programme alignment with KFL expectations and awarding organisation programme requirements.

2.32 The academic provision at each centre is predominantly classroom-based with KFL committed to increasing the availability and accessibility of online and distance learning over the next three years, and reducing the extent of formal teaching. The personalisation of learning for each student is a key feature of KFL's strategic approach to learning and its associated technologies.

2.33 Recruitment of students is the responsibility of employers and conforms to awarding organisation registration and prior learning requirements. KFL provides independent guidance to potential students through its website information and a Customer Support Team that provides a single point of contact for enquiries.

2.34 Students enrolled on a KFL-delivered programme receive access to a web-based welcome brochure that provides information on venues, timetables, MyKaplan and professional registration. Academic support for students is offered by programme tutors alongside opportunities to engage with additional tutorials, webinars and masterclasses. Distance-learning students are able to engage in programme-specific online communities.

2.35 To complement the taught delivery of programmes, Content or Product Teams at KFL develop a range of learning resources to support each of the programmes it delivers on behalf of the awarding organisations. These resources range from written texts to online materials and follow a detailed instructional design process that incorporates review and final endorsement by the professional body.

2.36 Attempts by KFL to introduce a Student Council as a more formal and cumulative channel for comment and engagement for UK-based students have yet to be successful. In meeting with staff, the team confirmed that KFL believes the responsibility for evaluating student information on gender, ethnicity, disability or diversity lies with the respective awarding organisations. However, one of the awarding organisations identified the application of equal opportunities as an issue in a KFL regional centre and it was unclear to the review team what responsibility KFL accepted for resolving this issue.

2.37 Regular monitoring of the attainment of its students at each centre through informal assessment processes enables KFL to use this information to identify 'at-risk' students and take steps to support them. Where necessary, reasonable adjustments are made to ensure all students enrolled by KFL are provided with appropriate support and guidance. The review team noted that KFL's student support services were deemed helpful and responsive.

2.38 The majority of students studying through KFL were employed or being sponsored by an employer to complete a professional qualification that would enhance their employment sector skills and prospects. These predominantly single-award qualifications did not necessarily have a subsequent career progression pathway via KFL.

2.39 The team considers that KFL has arrangements and resources in place that are regularly monitored and evaluated and enable students to develop their academic, personal and professional potential. The team also **affirms** the deliberate steps being taken to identify 'at-risk' students using relevant data. The Expectation is therefore met and the associated 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

2.40 KFL shares the management of student engagement with all the awarding organisations, with student engagement taking place in classrooms, via emails and surveys, and within online community forums. The strategic plan for student engagement is articulated within KFL's draft Teaching and Learning Strategy 2015 with the aim of engaging students through feedback and guidance at different intervals of the students' learning experience. This aims to monitor, review and evaluate information gathered to cater for all student needs, as well as the Kaplan Way, which is student driven and personalised with the aim of transforming lives.

2.41 Students give feedback informally in the class, through the end-of-programme feedback and surveys, via email and online. Student feedback is gathered twice yearly in the 'You said, we did' documents; this feedback is assessed by the National Product Team (NPT) and summarised by the Insight Team with the NPT making required changes. Student feedback follows an 11-point response scale that measures the Net Promote Score (NPS), a tutor appraisal process and bespoke student surveys. Students are further engaged with employers and are involved in bespoke research regarding larger changes such as programme design.

2.42 KFL does not have a Lead Student Representative or a Student Council despite attempts in gathering momentum for a domestic student council.

2.43 Engagement is seen in surveys being undertaken with feedback given but this is from the provider itself; there is no actual student ownership or proactive body that engages freely with Kaplan.

2.44 The team considered The Draft Teaching and Learning Strategy, The Kaplan Way and the Responsibilities Checklists as the key live documents that secure a basis for student engagement. The team examined student quotes; board reports; student surveys and research; student feedback and responses that include 'You said, we did' and client-specific feedback; external verifier reports; and information regarding setting up a student council. In addition, the team met the Chief Executive, staff and students to understand better student engagement at the College.

2.45 Staff confirmed that student engagement is on an individual basis with informal interaction on a day-to-day basis as the formal mechanisms have not been successful. Students are provided with opportunities to feed back from induction to end-of-programme surveys.

2.46 Students whom the team met felt that their issues were being acted upon and felt fully engaged as they have access to other students in class or online as well as their tutors outside of class. Students confirmed that KFL communicates with them via email either from their tutors or from KFL itself. They give feedback either directly to their tutors or via email. Students also have access to an academic support team throughout the working day. The students further expressed a lack of interest for a student body as their main aim is to undertake their programme and succeed in their examinations; they also have minimum awareness of KFL's initiative to set up a student council. Those students who are sponsored by employers tend to engage more with their key person at their workplace rather

than with KFL if they have issues to discuss, while others talk to their tutors or Centre Managers.

2.47 'You said, we did' boards that act as a feedback mechanism from KFL to the students are put up on rolling screensavers within the centres, allowing for a twice-yearly feedback process where students are updated on issues raised; these are at times posted on the online communities. The team acknowledges that students within the centres are able to give feedback and **recommends** that the College should establish a process to build upon the existing student feedback procedures on all delivery channels.

2.48 Students have the opportunity to engage with their employers by means of surveys and some of their awarding organisations, such as AAT, have their own student councils that have been elected across the regions.

2.49 The team acknowledges that as the students are at an alternative provider, they are engaged in a unique learning experience; however, it also recognises the need for a more formal structure that can engage students as partners in the assurance and enhancement of their educational experience through a collective student voice that will ultimately impact on the provider's quality process.

2.50 However, the team agrees that KFL has in place appropriate structures to engage students to meet the Expectation with a low level of risk.

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

2.51 KFL's primary objective is to prepare students for exams to achieve various qualifications in the fields of accountancy and finance. KFL has clearly delineated its responsibilities versus those of the awarding organisations on the Responsibilities Checklist for each award.

2.52 KFL has identified a market trend towards increasing flexibility and choice on the part of the students. As such, a move towards 'on-demand' examinations is planned to ensure students are able to access appropriate assessment opportunities.

2.53 It is the awarding organisations, and not KFL, who have the responsibility for setting and marking summative assessments. The exception is AAT, where KFL is responsible for assessing the vocational elements of the programme. Similarly, prior learning policies are set by the awarding bodies and are only determined by KFL as they relate to transitional arrangements where a change in the syllabus occurs. Each programme syllabus can be found on Kaplan's website. All examination guidance and unit specifications are available to students via MyKaplan.

2.54 Assessment results data and progression is regularly reviewed and informs decision making at KFL in terms of teaching and learning, formative assessment and the student learning experience. Results are benchmarked against the standards set by the awarding bodies. Individual contact is made with students either via their employer or KFL when a student is unsuccessful in an examination.

2.55 To prepare students for their exams, KFL tutors are involved in setting, marking and providing feedback on formative assessment. The details of this process are dependent upon the specific qualifications. Students share 'exam tips' via the Live Online system.

2.56 KFL administers the online examinations at its centres throughout the UK. Each awarding organisation has a unique set of invigilation requirements with which KFL complies. In instances where students have been granted accommodations in exam situations due to additional learning needs, these are also taken into account within the context of the specific allowances made by the awarding bodies.

2.57 The team tested this Expectation through the analysis of evidence such as results and progression data, interviewing students, clients and staff, and reviewing online information regarding assessments.

2.58 Tutors are trained in providing feedback in their initial KTA induction course. Following from that, however, marking of the formative assessments has been flagged as an area that has inconsistencies and could benefit from further attention, as well as systematic training and internal moderation of quality of feedback to students to produce consistent and reliable results.

2.59 The team therefore **recommends** that KFL develop a robust internal moderation process to enable students to achieve the intended learning outcomes for the credit or qualification being sought.

2.60 The review of the evidence with respect to assessment practices has determined that, overall, it is sound and reflects the team's decision that the Expectation is met and the 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

2.61 The respective awarding organisation is responsible for ensuring appropriate external examination of its programmes. All examinations are designed and produced by the awarding organisations and undertaken by KFL students at external venues. KFL has no influence or responsibility for the appointment or training of external examiners; this is solely the responsibility of their awarding organisations.

2.62 KFL staff attend examination board and conference meetings where external examiners present their reports to the awarding organisation.

2.63 Annual verification of the standard and quality of KFL delivery and assessment of these awards was conducted by some of the awarding organisations. External examiners' reports on student attainment in awarding organisation examination papers are shared with learning providers, and the review team saw evidence of how KFL amended its teaching guidance in response to the reports.

2.64 External scrutiny of KFL's provision was also provided by some of its commercial clients in annual reviews with KFL staff. These were focused primarily on the attainment of students and included comment on the quality of tuition and student preparation for the awarding organisation examinations.

2.65 The review of the evidence with respect to external examining has determined that it reflects the team's decision that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (B8): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective, regular and systematic processes for monitoring and for review of programmes.

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

2.66 The main body at KFL responsible for monitoring and reviewing programmes is the Kaplan Accountancy Product Board, set up in 2011. This Board is headed by the Director of Accountancy Product and reports directly to the Senior Leadership Team. The Board's aim is to keep in step with the product strategy, the objectives of the business, student and client needs as well as innovations in the educational field. This body is tasked with approving major changes to the courses (products) that it offers, finding ways of meeting student and client needs through problem-solving and research.

2.67 As detailed in Expectation A3.3, the awarding institutions conduct assessments on an annual basis according to their own regulations to reaccredit KFL as a Learning Partner.

2.68 Learning material and syllabi are reviewed annually. Tutors and Centre Managers are surveyed regularly. Collection and monitoring of the programmes via student feedback are evidenced through the Board reports in which information from the Consumer Insights team is summarised. The Board actions student feedback as needed and provides a redacted report to students in a 'You said, we did' format that is shown on screens in Kaplan centres around the UK.

2.69 Issues arising are met with immediate investigation and review. An outcome might be a request to change a product. The process around a change involves a large variety of stakeholders as deemed necessary by the nature of the change.

2.70 The process for change begins with a Product Change Request Form to include: details of the idea, benefits, problems it solves, how practically it could be realised and the risks. The request is subject to an initial review by the Product Managers. If it is a minor change it then goes through the change request process and is managed as an initiative. If it is a major change it becomes a separate project, starting with a business case. The initiative change request process allows all business units to comment on the change and enter the cost implications on their departments before it goes through to a project team evaluation. All change requests are subject to Product Board approval. Director approval is required where the change request is significant enough to need board approval. The Product Change Request has a project sponsor and owner to manage the change.

2.71 Regular yearly reports are devised for employers (clients). These reports highlight performance and issues experienced during the year. They have a section which identifies service issues and what actions are being taken.

2.72 To arrive at its conclusions, the review team reviewed the evidence provided and met Centre Managers and product team members as well as other staff and students.

2.73 Client feedback is monitored by a Customer Relationship Management (CRM) system. This is then summarised pictorially each month and shared with the Account Management Team and Sales Director. It provides a useful monthly barometer of clients' attitudes and service levels as well as influencing operations.

2.74 An exceptional and varied number of opportunities exist for students and clients to feed into ongoing monitoring and review of courses and centres. KFL engages its stakeholders (clients, students and staff) to highlight issues and subsequently takes action.

2.75 Monitoring is an ongoing and varied process in which the Product Managers and Product Board play a major role. Monitoring also takes place at centre level. It can be difficult to find the appropriate time in the annual or other cycle to formally hold a complete review of courses due to the nature of delivery; there is no natural 'pause'.

2.76 While the monitoring processes in place are numerous and ongoing, a more formal overall process that encompasses these strands across products and centres is prudent. Therefore, the review team **recommends** that KFL develops and implements a formal process to ensure regular and systematic monitoring and review of all programmes of study across all centres.

2.77 The review of the evidence with respect to monitoring and review processes has determined that it reflects the team's decision that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

2.78 KFL is responsible for student complaints; academic appeals are handled by the awarding organisations and the students are able to go straight to AAT, ACCA, CIMA or ICAEW.

2.79 KFL has a complaints policy and procedure which is accessible online; it also has a Customer Support function with advisers who provide advice on the phone to students. Complaints are logged and managed by a dedicated Complaints Officer. Students are made aware of the policy at induction and directed to the customer complaints procedure online on the virtual student site MyKaplan.

2.80 The team considered key evidence regarding academic appeals and student complaints. This included the key policy and procedure; responsibilities checklists; complaints logs; and the Complaints Officer's job description. The team also met staff and students to discuss the complaints and appeals process.

2.81 The team was informed that informal complaints are attended to within 48 hours and formal complaints within 14 working days. If students are not satisfied they can go to their awarding organisation while academic appeals are directed to the awarding organisation's appeals process. As a response to the review in 2012, KFL has mapped the Quality Code to the complaints and set in place a dedicated complaints officer.

2.82 Students informed the team that they are made aware of the complaints and appeals procedures at induction, through their tutors and their awarding organisation; they also have the option of talking to their employer, course tutor or centre manager or using the online complaints forms. Complaints are mostly made online and then directed to the relevant centres to be dealt with. These are then logged and categorised on a spreadsheet; the complaints officer liaises with the appropriate team with regard to the complaint and informs the student of the outcome. Appeals are made through senior management with a response given in 14 working days.

2.83 When complaints themes arise within a particular centre, further action is implemented. Staff confirmed that an area of development is the formalisation of addressing the themes of complaints.

2.84 KFL meets the Expectation as it has effective policies and procedures in place including those of the awarding organisations to manage student academic appeals and complaints.

2.85 The team concludes that the Expectation is met and the 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

2.86 As a provider of higher education without degree awarding powers, KFL has limited scope for managing higher education provision with others. Centres place high value on industry experience, evident in the qualifications and experience of teaching staff, and this includes content specialists who also teach. As previously noted, the vast majority of students studying with KFL are working and sponsored by their employers. As part of their commitment to their clients, KFL provides regular reports. These reports provide key data on their employee's success, including pass rate analysis, results and any issues raised by their employees. Employers are not directly involved in the actual delivery partnership, or the provision of learning opportunities, although this is perhaps implicit in the work they do with their employees.

2.87 Many students training with KFL have already completed undergraduate study, and arrive at their employers with degrees. Those without degrees can undertake a BSc in Applied Accounting (through ACCA and Oxford Brookes University) with mentoring support provided by KFL tutors. This is the only aspect of the provision that involves working with others, and requires KFL tutors to undergo online training with Oxford Brookes, and then adhere to strict mentoring agreement to support students on the programme to agreed deadlines. These mentors are not involved in assessment.

2.88 The review of the evidence with respect to managing higher education provision with others reflects the team's decision that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

2.89 Kaplan Financial Ltd does not offer research degrees, therefore this Expectation does not apply.

The quality of student learning opportunities: Summary of findings

2.90 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. All of the Expectations in this area are met and the associated level of risk is low in each case. The team identifies one feature of good practice. There are four recommendations and one affirmation. The feature of good practice identified focuses on the effectiveness of Kaplan Training Academy's support and development for new staff across all centres.

2.91 The recommendations focus on developing and implementing an appropriate teaching and learning strategy to enhance the quality of academic delivery and student learning. The recommendations will ensure students on all delivery channels have the opportunity to feed back on their learning experience, developing a robust internal moderation process to enable students to achieve the intended learning outcomes for the credit or qualification being sought. Developing and implementing a formal process to ensure regular and systematic monitoring and review of all programmes of study across all centres is also recommended.

2.92 The review team affirms the deliberate steps being taken to identify 'at-risk' students using relevant data.

2.93 The review team concludes that the quality of student learning opportunities at Kaplan Financial Ltd **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 KFL publishes a range information on its products and services to current and prospective customers primarily via the Kaplan website. The majority of the published information is digital, for example timetables, welcome e-brochures, promotional emails and student newsletters. In addition, a small number of items are printed, for example direct mail promotions, student experience posters in centres, and employer brochures. To maintain its ACCA Platinum status and remain a CIMA Global Learning Premium Partner, KFL must adhere to the awarding bodies' advertising guidelines. Information is published by the marketing teams in collaboration with Product Managers, and this involves checking the accuracy and completeness of the information. Before any information is published, the final version requires sign off by the marketing management team, and this is outlined in the marketing work-flow diagram, and confirmed by the review team, with KFL staff. All information is drawn directly from the awarding organisation's published materials to ensure accuracy and completeness. For new products, the Chief Executive provides the ultimate sign-off prior to publication.

3.2 The Learning Council is responsible for the dissemination of learning-related information. Due to the nature of the programmes being taught in class, Live Online, OnDemand and distance learning, most of the materials students use are online; students have access to online communities and engage in informal learning. Using a flipped classroom approach, students use texts and online materials.

3.3 On programme completion, and following examinations, ACCA and CIMA are responsible for releasing official pass rate results and the College has then to contact students to get their results, as they have to gain permission. Results analysis is then undertaken by KFL and reports are then provided to the employers via dedicated account managers.

3.4 ACA provides a complete list of exam results at each sitting, while AAT also provides a full list of exam results on their website monthly and KFL contacts the students regarding their results.

3.5 Details of results can be found on the KFL website, along with success stories and previous and current examination information. Through its website, Kaplan also promotes the fact it is the only approved providers of published materials, and fully endorsed by CIMA and ACCA.

3.6 The review of the evidence with respect to information that is fit for purpose, accessible and trustworthy has determined that it reflects the team's decision that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

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

3.8 There are no recommendations in this area.

3.9 KFL has robust systems for the production and monitoring of information. The team also recognises the effective use of the VLE for the provision of information for students.

3.10 The review team concludes that the quality of the information about learning opportunities at Kaplan Financial Ltd **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 KFL is very sensitive to consumer insight and is prepared to make changes when required to ensure it maintains a high level of pass rates and strong support from its stakeholders on a regular basis. The emphasis on the needs of its client groups is documented by the Kaplan Way, namely student success, a great place for students, continuous transformation and shared values. These four pillars form the basis of centre reports that are submitted to the Board each month. Issues and themes may arise through this channel and are effectively taken into account as KFL continues to develop and redevelop strategy. KFL is introducing Gemba Boards as a means of communication and disseminating information among staff at its centres.

4.2 Enhancement at KFL may be framed in terms of the Learning Strategy 2014 that contains key principles around personalisation (individualised learning), metrics and measurement (the need to be more proactive and intervene earlier), balancing formal and informal learning and innovation, such as gaming and adaptive learning. This strategy has developed out of a constant review of products by the Product Team.

4.3 In recognising a need for learners to be able to learn when and how they want, KFL is progressing plans to move to on-demand exams. It has, since 2013, begun to use the innovative approach of a 'flipped classroom' where the content delivery is largely asynchronous and engagement in real-time with tutors is based on applying the learned content and exam preparation.

4.4 The flipped classroom concept is joined up with Kaplan's evolution with regard to increasingly moving its provision online and developing learner communities and support structures for that environment. Following a change in syllabus requirements for AAT, it had become clear to KFL that this was an opportunity to change the approach to teaching and to the course itself. KFL was aware that students were looking for a more efficient and flexible use of their time. The pass rates were noticeably higher, as was student satisfaction, as a result.

4.5 Another example of the enhancement of learning opportunities is in the role that KFL plays in an arrangement between Oxford Brookes University and ACCA. KFL is a key player in offering students the opportunity to 'bridge' between ACCA qualifications and on to the university's BSc in Applied Accounting. KFL both signposts eligible students to this opportunity and provides a mentor (trained and certified by Oxford Brookes) for students pursuing this route.

4.6 KFL employs a Head of Learning and a Manager of the Kaplan Tutor Academy. These key positions have the capacity to innovate within the areas of the student experience and the continual development of tutors. Although KFL has a Learning Strategy, it is clear this is a more commercially focused document and not a teaching and learning strategy that would be more focused on the enhancement of student learning. The good practice around the Kaplan Tutor Academy would be further complemented by a written strategy that specified the pedagogy of Kaplan, the KTA and its tutors and enhanced consistency and quality across centres and types of provision. Such a strategy could conceivably be the vehicle for continued enhancement of KFL's provision.

4.7 Kaplan has had very limited engagement thus far with the Quality Code. Knowledge of the Quality Code is not widespread among staff. KFL has mapped its provision against the Quality Code. This proved useful in identifying the need for a more formalised complaints system and was a catalyst for the creation of the role of Complaints Officer. However, this mapping process has not stimulated further scope to view KFL's provision from within this framework.

4.8 This resulting enhancement following the mapping of provision with the Quality Code is an integral aspect of KFL's ability to provide quality higher education in the UK. As part of its responsibilities as an alternative provider of higher education in the UK and its ongoing commitment to quality, the review team **recommends** that KFL strengthens the organisational engagement with the Quality Code to enhance the quality of student learning opportunities.

4.9 The review of the evidence, however, with respect to ongoing strategic enhancement has determined that, overall, it is sound and reflects the team's decision that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

The enhancement of student learning opportunities: Summary of findings

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

4.11 There is one recommendation identified in this area, namely for Kaplan Financial Ltd to strengthen its organisational engagement with the Quality Code to enhance the quality of student learning opportunities.

4.12 Kaplan Financial Ltd takes a strategic approach to the enhancement of student learning opportunities. Enhancement initiatives are identified and implemented in a systematic manner across the organisation. There are clear mechanisms for sharing good practice and numerous examples of the positive impact of these mechanisms.

4.13 The review team concludes that the enhancement of student learning opportunities at Kaplan Financial Ltd **meets** UK expectations.

5 Commentary on the Theme: Student Employability

Findings

5.1 The majority of students who have selected to study through KFL are part-time and pursuing professional qualifications in accountancy and finance. They are normally employed or sponsored by an employer. Some of these employers are the commercial clients of KFL and provide work-based training contracts for their learners as defined by the awarding organisations.

5.2 The incorporation of broader employability skills within its PassPlus scheme was a feature of the Accountancy Technician's programme at KFL. A small number of students were seeking a career change into accountancy and KFL did not have any responsibility for finding relevant work experience to support their studies.

5.3 KFL appoint tutors with industry experience and professional qualifications. The Kaplan Training Academy (KTA) ensures tutors are updated on amendments to any of the awarding organisation syllabi and are encouraged to attend professional body conferences and workshops. Maintenance of professional qualification status is the responsibility of the tutor.

5.4 KFL shows a strong commitment to working collaboratively with its commercial client employers, and through the agreement of training contracts it promotes key learning practices for students. These include the promotion of online and self-managed learning, the exploration of different forms of group work, and the use of revision phases in a study programme. In 2015, KFL provided regional conferences as a vehicle for professional networking among its clients, employers and former and current students.

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 22-25 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.

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* (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.

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.

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