

Higher Education Review (Alternative Providers) of Kaplan Financial Ltd

November 2020

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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 on 29 May 2020 and 11 to 12 November 2020 and was conducted by a team of five reviewers, as follows:

- Dr Sally Bentley
- Mrs Jill Lyttle
- Ms Elizabeth Shackels
- Professor Denis Wright
- Mr Stuart Cannell (student reviewer).

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

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

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

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

The QAA website gives more information <u>about QAA²</u> and explains the method for <u>Higher Education Review (Alternative Providers)</u>.³ For an explanation of terms see the glossary at the end of this report.

The impact of COVID-19

As a result of the COVID-19 pandemic, the review of Kaplan Financial Ltd in 2019-20 was subject to an interim outcome in May 2020 and was concluded in November 2020. The review was conducted online and included meetings with senior management teams, teaching staff and students. The scope of the evidence considered, and the nature of the judgements and operational milestones have remained the same but with some adjustments due to the online format. A risk assessment was carried out prior to the review to identify and mitigate any potential risks. Annual monitoring will resume in 2021-22.

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

² QAA website: www.qaa.ac.uk

³ Higher Education Review (Alternative Providers): <u>www.qaa.ac.uk/reviewing-higher-education/types-of-review/higher-education-review</u>

Key findings

Judgements

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

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

Good practice

The QAA review team identified the following feature of good practice.

• The comprehensive and interactive virtual learning environment MyKaplan, rapidly developed and enhanced during COVID-19, provides a highly effective resource for student learning and makes a particularly positive contribution to student achievement and satisfaction (Core practice 4).

Recommendations

The QAA review team made no recommendations.

Affirmation of action being taken

The QAA review team made no **affirmations** of actions already being taken.

Financial sustainability, management and governance

The financial sustainability, management and governance check has been satisfactorily completed.

About the provider

Kaplan Financial Limited (Kaplan; KFL) is part of the Kaplan UK Group, which in turn is part of Kaplan Inc., one of the world's largest private education companies. For over 80 years, Kaplan UK has supported the development and careers of finance professionals and has become a leading education provider.

Kaplan Financial Limited's first QAA Review for Educational Oversight was undertaken in 2012, with the most recent Higher Education Review (HER) in 2016. The HER report of 2016 confirmed that Kaplan Financial Limited met the expectations across all four judgement areas. The conclusions of annual monitoring visits over the past four years have consistently shown KFL to be making acceptable progress with continuing to monitor, evaluate and enhance its higher education provision

Kaplan Inc. provides education and career services to approximately 1.2 million students annually in more than 30 countries worldwide and to over 100 countries online. With over 13,000 employees and 10,000 business clients worldwide, Kaplan Inc. is the largest subsidiary of the Graham Holdings Company (GHC), a diversified education and media company whose principal operations range from educational services to hospice care and manufacturing. Total annual turnover for 2019 was £87 million, and during that year Kaplan supported 51,088 students.

Kaplan's vision is to 'make a difference to every learner and inspire them to succeed'. It aims to encourage, motivate and empower learners with market-leading teaching, support and materials, to help all students achieve their academic and career best. Kaplan aims to create an environment which embraces diversity and promotes equality and inclusion, opening doors and broadening access to education.

Kaplan identifies four shared common goals which aim to support student achievement:

- Student Success putting the student first, enabling the most direct path to results that matter
- Continuous Transformation to innovate, measure and advance the education of students
- Great Place enabling Kaplan teams to engage in work with energy and enthusiasm
- Shared Values acting with integrity and upholding Kaplan values.

As a delivery organisation, Kaplan works with a number of professional bodies and awarding organisations, delivering modules and programmes of study that prepare students to complete examinations set by each. It does not have responsibility for determining or shaping academic standards, since the decision as to whether a candidate has reached the required level remains with the awarding organisations. Entry requirements for students are set by the awarding organisations. The main awarding organisations with whom KFL works in partnership are:

- Association of Accounting Technicians (AAT)
- Association of Chartered Certified Accountants (ACCA)
- Chartered Institute of Management Accountants (CIMA)
- Institute of Chartered Accountants in England and Wales (ICAEW for CFAB and ACA qualifications)
- The Chartered Institute of Taxation (CIOT for CTA and ATT qualifications)
- The Chartered Banker Institute (for Level 6 and Level 7 Financial Services Apprenticeships and Level 6 Relationship Manager)
- The London Institute of Banking and Finance (for Level 6 Financial Services Apprenticeship)

- The International Compliance Association for Level 6 Risk Apprenticeship
- CIPD for Level 5 HR Consultant Apprenticeships (subcontracted provision to MOL/Total People)
- CAIA Chartered Alternative Investment Analyst
- CFA Chartered Financial Analyst
- CISI Capital Markets Programme
- FRM Financial Risk Manager

There are five key awarding organisations which represent 95% of the programmes offered. These are: AAT, ACCA, CIMA, ICAEW and CIOT. The awarding organisations have their own quality assurance and compliance systems. Quality assurance mechanisms employed by the awarding organisation include annual self-reporting against set indicators, audit visits, inspection reports and student feedback surveys.

Generally, to gain a professional qualification, students must successfully pass exams in around 12 to 15 subjects, often grouped into three academic levels. To be admitted to membership of the professional body, in addition to the examinations, students have to demonstrate relevant work experience, and each award carries a specific designation.

Each awarding organisation offers syllabus guidance, with learning outcomes, for each subject. These are revised regularly, usually every four to five years. If a student chooses to study with Kaplan, there is no obligation to remain for the duration of their studies and students can choose to change the mode of study or training provider at any point.

Kaplan offers students a range of ways to study, incorporating daytime, evening and weekend tuition. The four delivery channels listed below have unique attributes but also much in common, as one channel can be blended with another. The four modes of study delivery are:

- Classroom face-to-face scheduled courses held in 25 central training locations around the UK.
- Live Online live, scheduled courses run over the internet
- OnDemand flexible online courses
- Distance Learning flexible courses where students are able to engage in selected online resources to supplement their textbooks.

Courses are tailored to the demands of working students. A substantial proportion of students studying with Kaplan are in employment and are financially supported either by their employers, or through apprenticeship funding. Currently 60% of students choose to study by Live Online, OnDemand or Distance Learning.

All students, regardless of study method, are supported by a team of academic support tutors. The tutors are available to answer subject-related queries through email, call back, or live chat during opening hours, including evenings and weekends.

The student population comprises those who are paying for their own courses, those who are employer-sponsored and those who are undertaking an apprenticeship programme. Employer-sponsored students are employed by a wide variety of organisations. In order to ensure clarity of responsibility, the level of service specification agreed with these clients is documented in a service level agreement.

Kaplan offers courses to domestic students who account for 91% of enrolments and to international students who make up the remainder. In August 2015, Kaplan ceased accepting new Tier 4 applications.

There are 16,400 students currently studying with Kaplan compared with 18,596 at the time of the June 2018 monitoring visit.

Around 26% of students are apprentices funded through the Education and Skills Funding Agency (ESFA). Apprenticeship programmes represent approximately 40% of Kaplan revenue, across Levels 2 to 7. All ESFA-funded programmes at Levels 2 to 5 are subject to Ofsted Inspection and in 2020 the Level 6 and 7 provision has been reviewed by the Office for Students (OfS).

Apprenticeship programmes take a holistic view of the curriculum to address the knowledge required by the relevant professional body, and the knowledge, skills and behaviours stipulated by the apprenticeship standard and by the final assessment requirements. Apprentices do not undertake distance learning and are not permitted to enrol on self-paced distance study models. Kaplan has increased the number of apprenticeship programmes offered, including the introduction of a number outside the core fields of accountancy and tax. However, the number on these programmes still remains low at less than 5% of the total student population.

The parent organisation Graham Holdings Company (GHC) has responsibility for risk and compliance matters across the Kaplan group as a whole. GHC governs the process by which each group member reports and manages material risks and issues that could impact the long-term sustainability of a group member. Risk, compliance and internal control matters are recorded within a single platform for managing risks and controls. The GHC Board manages risk, compliance, internal control and approvals through various oversight committees.

The Kaplan UK Group (KUK) currently employs 709 staff, of which 80% are full time. The Executive Leadership Team (ELT) is led by the Chief Executive Officer. The ELT is responsible for strategic planning, resources and the development and fitness for the purpose of the programme portfolio. The ELT meets on a quarterly basis. The ELT 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 ELT has executive and governance responsibility for human resources, financial status, physical resources, strategic direction/objectives and performance monitoring, including academic performance. Strategic direction and organisation objectives are communicated to all KUK employees through a quarterly business update.

The KUK Executive Leadership Team is supported by the Professional Leadership Team (PLT) at Kaplan Financial Ltd which meets monthly and whose membership includes the Director of Apprenticeships. The PLT is responsible for the Kaplan overall academic portfolio and apprenticeship provision, including standards.

Performance is measured through a series of key performance indicators (KPIs), which are updated on a monthly basis. All KPIs are focused around one of three core measures: student satisfaction, operating income margin, and employee engagement.

Since the QAA HER review in 2016, Kaplan has undergone a substantial business restructure, moving from local centre-based general management to one of single dedicated teams. This represented a significant shift for the business and took over two years to complete fully.

Kaplan has identified a number of key challenges. These include potential funding cuts, including: for Level 7 Accountancy/Taxation Professional Apprenticeship; increased student choice owing to an increase in the number of exam windows offered by awarding organisations (including a move to on-demand style exams, with a trend towards students delaying sitting exams and also completing fewer subjects per year which delays progression between levels); data management and security with the introduction of GDPR, which has resulted in changes to

consent processes that limit the flow of information about students from the awarding organisations; and the significant pace of change of technology and its impact on students and learning.

Kaplan has identified its 2022 vision to establish itself as 'an efficient, highly respected education and assessment organisation, renowned for making a difference and creating successful careers'.

Explanation of findings

This section explains the review findings in greater detail.

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

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

Findings

1.1 Kaplan does not set the academic standards for the qualifications it offers and as a delivery organisation its responsibilities are limited. Academic standards and syllabus content are set by external professional bodies and the many awarding organisations with whom Kaplan works. The responsibility for setting standards consistent with relevant national qualifications frameworks lies with the awarding organisations.

1.2 The processes and procedures put in place by Kaplan would allow the Core practice to be met. The team considered a range of internal documentation, including minutes of meetings and reports of key performance indicators (KPIs) as well as external reports, and held discussions with staff at all levels.

1.3 At an operational level, Content Specialists are responsible for their own subject area, liaising with relevant staff in each awarding organisation. This informs the updating of published student material and is shared with teaching staff.

1.4 Relevant external reference points are used to ensure that apprenticeship students attain the required standard. This provision is subject to reviews by external regulators depending on level: Ofsted for Levels 2-5 and the Office for Students for Levels 6-7. Kaplan's provision is supported by its Matrix successful accreditation.

1.5 Kaplan has in place clearly understood structures and processes that ensure knowledge and understanding of relevant standards is maintained at organisational level and disseminated to teaching staff. Awarding organisations carry out regular reviews, leading to reaccreditation.

1.6 The review team concludes that the Core practice is met and the level of risk is low.

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

Findings

1.7 Achievement of the threshold level is all that is required of students by the awarding organisations who determine that final assessment results are either pass or fail. The application and implementation of this Core practice lies with the comparison of Kaplan student outcomes with overall student outcomes for each awarding organisation.

1.8 The processes and procedures would allow the Core practice to be met. The team considered a range of documentation, including KPI reports and minutes of meetings, and held discussions with staff at all levels.

1.9 Student pass rates are part of Kaplan's core detailed KPIs. The Professional Leadership Team reviews the comparison of pass rates against overall awarding organisation pass rates. Programme managers are responsible for investigating and explaining variations. Outcomes are regularly reported to each management level and shared with all staff. Student achievement reports demonstrate that Kaplan students clearly outperform professional awarding organisation averages.

1.10 The review team concludes that engagement with appropriate academic standards and learning outcomes meets the requirements of the awarding organisations and ensures that the Core practice is met and the level of risk is low.

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

Findings

1.11 Kaplan is formally recognised by its awarding organisations as a Partner in Learning or an Approved Learning Provider on the basis of maintaining set performance measures confirmed by external reviews. Ownership of academic standards lies with the awarding organisations and Kaplan has no responsibility for curriculum design. However, in the spirit of partnership working, awarding organisations consult widely with major stakeholders, including delivery organisations such as Kaplan, when developing and revising the curriculum.

1.12 Kaplan's publishing division develops and produces a range of in-house online learning materials and teaching resources for tutors, including formative and mock assessments. Some awarding organisations approve Kaplan's published materials for use in tuition for their awards; other organisations publish their own materials which are required to be used. Kaplan's team of Content Specialists highlight the specified learning outcomes and objectives for tutors and update materials to ensure currency of the provision.

1.13 Kaplan offers apprenticeship training at all levels directly, and through a small number of approved subcontractors which are subject to regular monitoring. Quality assurance processes apply equally to apprenticeships with additional monitoring for subcontractors, for example through observation of tutors.

1.14 The processes and procedures put in place by Kaplan would allow the Core practice to be met. The team considered a comprehensive range of both external and internal documentation, including correspondence and reports from awarding organisations, and held meetings with apprenticeship subcontractors and with staff at all levels.

1.15 Kaplan works closely with its many awarding organisations to improve its provision. Knowledge of future syllabus changes identified by Content Specialists informs the updating of published student material and is shared with teaching staff through an efficient and effective faculty manager network, online virtual sessions, the MyKaplan discussion forum, and peer-topeer transmission.

1.16 Kaplan works with a small number of experienced and trusted subcontractors who provide regular information about apprenticeship performance as part of monitoring processes. The representatives who met with the team confirmed that appropriate contact is maintained with them and with employers to ensure effective oversight of apprentice provision.

1.17 The review team concludes that there are in place effective arrangements to ensure that the standards of Kaplan's awards are credible and secure and, therefore, the Core practice is met and the level of risk is low.

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

Findings

1.18 Kaplan is not responsible for either the design or the marking of summative assessment. Responsibility for this rests wholly with the awarding organisations. Additionally, Kaplan has no responsibility for apprenticeship end-point assessments. Kaplan does, however, design and mark formative and mock assessments as part of its professional provision and support for students learning.

1.19 Some awarding organisations approve Kaplan's regional centres for use as examination venues for their online examinations. Students who sit their examinations in Kaplan centres, including those who do not study with Kaplan, are emailed afterwards for feedback on their experience of using the facility.

1.20 The processes and procedures put in place by Kaplan would allow the Core practice to be met. The team considered both external and internal documentation, including correspondence from awarding organisations, and held meetings with staff and students.

1.21 Kaplan has developed its internal moderation process and is currently reviewing its assessment strategy to ascertain how formative assessments help improve student outcomes. Students who met the team appreciate the feedback they receive, although some expressed reservation on how helpful they find the marking of the mock examinations. The team learned from staff that students who perform poorly in mock examinations are contacted to discuss their revision plans. However, comparative analysis of mock and final assessments is not currently carried out, although plans are in place for this activity.

1.22 Although Kaplan centres are regularly approved by awarding organisations as examination venues, Kaplan itself has no responsibility for any formal assessments leading to the awards for which it prepares its students.

1.23 The review team concludes that the external expertise, assessment and classification processes are reliable, fair and transparent and the Core practice is met and the level of risk is low.

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

Findings

1.24 Governance is effectively exercised by Kaplan Inc., which receives a bi-annual report from Kaplan UK on the performance of its programmes as indicated by a range of factors: student outcomes; student progression; and learner satisfaction. The UK Executive Leadership Team (ELT) reviews key performance indicators (KPIs) at its monthly meetings. The Professional Leadership team (PLT) meets monthly to review performance and product quality.

1.25 Kaplan operates a unitary structure across the UK. Responsibility for programme monitoring, review and enhancement lies with the National Product Team. Each awarding organisation has two dedicated relationship links: with a commercial manager and with a product manager for each qualification. Product managers engage regularly with key stakeholders to review their programme and are responsible for developing programmes that are fit for purpose, meet Kaplan's quality standards and are delivered consistently across all modes of learning. They also investigate and report on changes in relevant KPI results each time they are reported, with a view to improving student success.

1.26 The key student satisfaction metric is based on feedback, which follows an 11 point response scale that measures the net promoter score (NPS). This is regularly reviewed, analysed and discussed at all levels. The NPS is derived from student survey responses about key aspects of provision, including teaching staff, learning resources, academic support, customer services, and formative assessment marking. Each element is reported against targets and trends are monitored. Students whose NPS is less than 6 are contacted individually and asked how Kaplan could improve their experience. Other KPIs include improvement and enhancement outcomes, such as teaching quality; timely return of marking; academic support; and pass rates. Data dashboards are updated monthly and posted on the staff intranet.

1.27 A Teaching and Learning Strategy (TLS) was developed in response to a recommendation emanating from the QAA 2016 HER and it is reviewed annually, involving discussion with staff. It was last reviewed in April 2020 and staff training developed through the Kaplan Teaching Academy.

1.28 The organisational and reporting structure for apprenticeships was previously separate from that for professional programmes. From May 2020, the Director of Apprenticeships became a member of the PLT. Kaplan's regular quality assurance processes also apply to its apprenticeships, with additional supervision of subcontractors. Detailed service level agreements with a small number of subcontractors include specified contacts. An external advisory Apprenticeship Governance Board is in place. Apprenticeship success rates are monitored. These include end-point assessment results; timely completion of frameworks; leaver non-achievers; and destination and progression information. Each apprentice is allocated a Learning Coach to guide them through technical content and a Talent Coach who supports them in the development of generic skills and liaises with the employer.

1.29 Student feedback processes have developed following a previous HER report recommendation. Consideration of student feedback is embedded in regular review activity, including an Insight Log, monitored monthly (since August 2017), focus groups, an annual student satisfaction survey, and a quarterly feedback review with a rolling action plan for the enhancement of provision (since October 2019). Questionnaires are reviewed and developed to reflect views on evolving activity.

1.30 Kaplan's forward planning includes the development of a unitary quality function across all programmes, including apprenticeship provision. The new role of Quality and Equality Manager, with responsibility for all provision, has been created and appointed. A quality team meeting comprising the Quality and Equality Manager and the Apprenticeships Quality Manager is held every two months. This is enabling increasing harmonisation and enhancement of practice.

1.31 The structures and procedures in place would allow the Core practice to be met. The team considered a wide range of documentation, including review reports from all processes, and held detailed discussions with students and staff at all levels.

1.32 The organisational and reporting structure is well understood by staff. Terms of reference are understood and minutes of meetings clearly outline responsibilities, actions and outcomes. Students are engaged with, and value, feedback processes. Many KPIs are derived from student feedback, and are reported and considered thoroughly by senior managers. Indicators were amended to reflect and evaluate the change in learning and teaching approach owing to COVID-19.

1.33 The integration of the Director of Apprenticeships in the PLT has generated synergy. Staff surveys confirm increased collaboration across teams. Kaplan now only works with employers with a track record of apprentices completing their programme. The 2019 apprenticeship survey results elicited positive responses.

1.34 Kaplan works closely with its awarding organisations to drive improvement and enhancement through its team of Content Specialists who bring in knowledge of developments and best practice for implementation and dissemination. There are effective and supportive integrated relationships that exist through the network of faculty regional managers, the strong links within the Instructional Design and Development team, with Content Specialists and wider faculty.

1.35 Information about new technological learning tools is researched and cascaded to teaching staff. Initiatives are tested with the student body. Several Kaplan projects have been shortlisted for Learning Technology Awards over the years, including one developed in response to COVID-19 which won a bronze award.

1.36 The team heard that the TLS is still linked to the previous Quality Code. Kaplan considers that the Core practices of the revised Quality Code have nevertheless already been embedded. The process of formal mapping of Kaplan practice, supported by evidence, against the revised Quality Code began in spring 2020. However, at the time of the review this activity was one of the planned tasks paused due to COVID-19 (see paragraph 1.39).

1.37 Kaplan's provision is subject to a number of external benchmarks as well as the Quality Code and its approach to meeting these is to integrate all standards into institutional processes and procedures. Consistent with its unitary organisational structure, detailed knowledge is held at institutional level and staff are expected to understand the totality of practice required. Knowledge of the Quality Code is cascaded through the faculty manager network.

1.38 Kaplan's self-evaluation document provided for the review identifies a number of areas for ongoing development. These include the formal documenting of all review processes, an action emerging from a recommendation of the QAA HER 2016, which has still to be completed. Some actions were paused due to the additional work required to respond to the COVID-19 pandemic, although work was continued with others throughout 2020. Similarly, most actions in the rolling action plan for the Quarter End Feedback Review were put on hold, with further activity scheduled for December 2020 onwards.

1.39 Planning for moving classroom learning to online provision in response to COVID-19 began in February 2020. As well as technological and pedagogical developments, including moving digital platforms during the period, other resources were developed and implemented to strengthen and enhance existing student support. These included additional content and revision resources together with extra wellbeing and other advice for students. Bespoke resources were developed to support apprentices, nearly all of whom have stayed on course. All initiatives were monitored through appropriate new KPIs to evaluate their effectiveness. Regular review reports continued with amendments in recognition of the new learning environment. Some KPIs were suspended as they lacked relevance in the current pandemic. New performance indicators were introduced, including Live Online reliability, student satisfaction, individual student interaction, and number of 'hits' for the new resources available. Analysis of the performance indicator results demonstrate the effectiveness and responsiveness of actions taken by Kaplan. Students commented that the resources available through MyKaplan and the support they received from both teaching and support staff was excellent. This matter is also addressed as good practice in paragraphs 2.31 to 2.36.

1.40 The structures and processes put in place to ensure the regular monitoring and review of the quality standards of its provision are robust and are well understood by staff. Outcomes are regularly used to develop its provision and enhance support for both students and apprentices. Strong cross-organisational networks ensure that faculty staff are well informed; students appreciate the resources and support provided. Kaplan's response to the advent of COVID19 is a clear and effective example of its ability to maintain and adapt its regular practices to ensure immediate feedback on changes, and its agility in successfully responding to the need to develop wholly online tuition and quality resources for students. This matter is also addressed as good practice in paragraphs 2.31 to 2.36.

1.41 The review team concludes that Kaplan reviews its core practices for standards regularly and uses the outcomes to drive improvement and enhancement. Therefore, the Common practice is met and the level of risk is low.

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

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

1.43 All four of the Core practices and the Common practice for this judgement area are met and the associated level of risk is low in all areas. There are no features of good practice, recommendations or affirmations in this area.

1.44 Kaplan does not set the academic standards for the qualifications it offers as these are set by external professional bodies and awarding organisations. As a delivery organisation, Kaplan has a clear understanding of its responsibilities for maintaining academic standards. Kaplan has put in place clearly understood structures and processes that ensure knowledge and understanding of relevant standards is maintained at organisational level and effectively disseminated to teaching staff.

1.45 The review team concludes the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations at the provider **meets** UK expectations.

2 Judgement: The quality of student learning opportunities

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

Findings

2.1 Kaplan has limited responsibilities for ensuring that applicants satisfy the relevant criteria prior to enrolment. Students apply directly to their respective awarding organisation and then select Kaplan as the delivery centre in which to study. The awarding organisations have responsibility for ensuring that an applicant satisfies the entry requirements prior to proceeding towards enrolment. Kaplan takes steps to ensure that every student succeeds and has the appropriate support to do so.

2.2 The processes and procedures put in place by Kaplan would allow the Core practice to be met. The review team explored the submitted evidence and information prior to meeting relevant staff and current students. The review team explored with professional service staff how the admission and enrolment process works in practice.

2.3 Staff confirmed that awarding organisations set entry criteria and have responsibility for ensuring that applicants met this prior to any enrolment activity taking place. Once students choose Kaplan as their delivery provider, they can self-enrol through the website or have their application supported by staff. The relationship with awarding organisations is maintained with each of the Product Managers. Changes to entry requirements are communicated through the Product Mangers to Kaplan. Subsequently, relevant marketing material is updated to ensure that applicants received the most up-to-date information prior to applying.

2.4 The review team met students who confirmed that they are generally happy with the enrolment process and that minor issues were resolved promptly by the relevant department. Additionally, students confirmed that they receive an induction process and guidance on how to use MyKaplan prior to commencing their studies.

2.5 The review team concludes that Kaplan meets its responsibilities for the Core practice and works to ensure that the enrolment process is clear to applicants and relevant support provided, when needed. Therefore, the Core practice is met and the associated level of risk is low.

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

Findings

2.6 Kaplan does not have responsibility for curriculum design or assessment. Kaplan has a clear understanding of its role which is articulated in the responsibility checklists. Awarding organisations have the responsibility to meet the requirements of the relevant national qualifications framework and that the value of the qualifications awarded is in line with sector-recognised standards.

2.7 The processes and procedures put in place by Kaplan for the delivery of high quality courses would allow the Core practice to be met. There are effective processes and systems in place to design and deliver high quality courses. The team held meetings with a range of staff and students, reviewed the Teaching and Learning Strategy, staff resources on MyKaplan and examined annual surveys and minutes of meetings.

2.8 Applicants must satisfy the relevant admission criteria, which includes eligibility, minimum entry requirements, training contract requirements, prior attainment to determine levels of study, English language requirements and a genuine intention to study. Each awarding organisation has appointed a dedicated link with Kaplan and which provides regular effective communication. Awarding organisations often float ideas with Kaplan for consideration, before putting these into practice.

2.9 Kaplan's Teaching and Learning Strategy (TLS) refers to the assurance of quality learning opportunities and effective processes for design, development and approval of courses. The strategy is updated annually and is intended to promote a shared understanding of Kaplan's ethos for teaching and learning to drive the design and delivery of courses. For 2020, the TLS focuses on increasing the importance of Kaplan's apprenticeship business, to ensure sufficient coverage of teaching beyond the technical qualification. Oversight of the strategy rests with the Head of Learning, who works with the Quality & Equality Manager to ensure that it is regularly updated and used by key stakeholders.

2.10 The individual modules a student needs to achieve are pre-determined by professional bodies and in some instances this extends to the order in which subjects are taken. Professional bodies offer syllabus guidance and learning outcomes. The annual revision involves researching current themes and trends within the higher education environment. Revisions are forwarded to the product team for consideration, further development and cascaded to teaching staff. This approach ensures relevance and accuracy in the implementation of all course material at programme level.

2.11 Kaplan has taken responsibility for promoting academic standards through achieving Approved Learning Provider Status, given by each awarding organisation. In practice, this means that Kaplan meets specific performance targets in terms of course tuition and support, and this status provides formal recognition of the quality of tuition. For one organisation, ACCA, Kaplan has achieved the highest accreditation by meeting a range of challenging performance requirements.

2.12 Kaplan has effectively established its own publishing division, creating digital and written learning material. The Instructional Design and Development team produce all online content for the virtual learning environment. Subject experts belonging to the Content Specialists Team interpret the syllabus and design a range of learning materials with a focus on intended learning outcomes. Content comprises soft copy learning materials, a range of instructionally designed bite-sized e-learning modules and online learning videos. Additionally, there is a range of formative assessments, including knowledge checks, progress tests, and mock examinations. For ACA and CIOT, Kaplan purchases materials from external providers.

Senior staff stated that during the current pandemic greater flexibility was made available by unlocking extra course content for students.

2.13 Students access learning materials through the virtual learning environment, MyKaplan. They have access to a range of study options, including Classroom, Live Online, On-Demand and Distance Learning, or choose a blended learning approach. Students work independently to a suggested timetable, with monitoring and support from the coaching team. Distance learning students study primarily from textbooks, accessing selected online content for additional support. Students indicated that they had been effectively supported during the pandemic by staff, many of whom had provided additional support beyond their specific responsibilities.

2.14 Kaplan adopts a holistic view of the curriculum with their apprenticeship provision to ensure that all apprentices are taught the knowledge requirements for their professional qualifications in conjunction with the standards stipulated by the apprenticeship framework. This ensures they are well prepared for end-point assessment.

2.15 Kaplan conducts formative assessments and provides appropriate feedback to students in preparation for summative assessment. Student feedback is regularly sought to help ensure that the learning environment and staff team meet with the required standard. Academic support staff undertake moderation of this process. Students indicated that there is some variation in the quality of feedback given. Kaplan is currently working to ensure that the quality of formative feedback is more consistent.

2.16 Since the 2016 HER review, monitoring processes have been restructured with a focus on the use of key performance indicators (KPIs). This process starts with goal setting, which includes identifying highly defined objectives. Goals are communicated to all managers who are required to set KPIs. Some KPIs, such as student performance, are retained year on year. Senior managers meet monthly to review all KPIs to address current trends which identifies any underperformance, which can then be swiftly actioned. The process described by managers reflects an effective, cross-organisation approach.

2.17 Kaplan Financial takes a well organised and resourceful approach to ensuring it has effective processes and systems in place to and deliver high quality courses. The Core practice is met and the level of risk is low.

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

Findings

2.18 Most staff have relevant professional or industry backgrounds together with a postgraduate financial qualification. Staffing is supplemented by freelance tutors as required. A Head of Faculty is supported by a team of regional faculty managers to whom the academic staff report and who oversee the professional development and performance of their teams. A key vehicle for the training and support of academic and support staff is the Kaplan Training Academy. New staff undertake an induction followed in stages by a three-year programme of training which includes four residential courses. Staff benefit from a tutor handbook, support in the form of meetings and observations, a buddy system, and additional resources on MyKaplan, including StoryBank and VideoBank resources which allow staff to share experiences across the different centres. Nominated members of the Kaplan Training Academy link with each of the five Regional Faculty Managers to enable consistent training across the centres and tutors' performance is monitored against individual goals linked to agreed indicators and Kaplan benchmarks. Equivalent processes exist for Academic Support staff and Content Specialists.

2.19 The processes and procedures for staff appointment, training, support and performance management allow the Core practice to be met. The team tested this approach by holding meetings with a range of staff and students, exploration of staff resources on MyKaplan, consideration of Kaplan Training Academy materials and by evaluating the tutor handbook.

2.20 After teaching for three years, staff are offered the opportunity to complete an external Postgraduate Certificate in Education Practice. For experienced staff, further development is offered through other external programmes and most tutors are members of their relevant professional body. There is enhanced guidance to tutors on assessment moderation following a recommendation in the 2016 HER report. Line managers offer training to administrative staff.

2.21 The Kaplan Training Academy, combined with oversight by the regional faculty managers, is an effective way of consistently inducting and training a large team of staff who teach in a mixture of scheduled and online learning environments, across multiple geographic centres and with different awarding organisations. Staff with different levels of experience working across the different centres and learning environments report that they find the range of training, support and development opportunities on offer to be very helpful. Students report widespread satisfaction with the quality of the teaching they receive.

2.22 Prior to the 2020 pandemic, only 35% of staff had extensive experience of teaching online, 34% had some experience and 31% had no experience. Regular training was instigated during March 2020 and feedback from staff is that these fortnightly sessions were very helpful and they attest to the usefulness of the resources available to them, including On Demand Kaplan Product, VideoBank (which provided short focused videos on useful topics) and StoryBank (real-life examples and case studies). Students met by the team unanimously commented that teaching continues to be as effective as it was before the pandemic, despite face-to-face classes being moved online.

2.23 Kaplan takes a systematic approach to the training, support and management of its staff. The materials on MyKaplan form an effective resource for staff training and development. Staff are appropriately qualified and skilled to deliver a high-quality academic experience. The Core practice is met and the level of risk is low.

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

Findings

2.24 The majority of Kaplan students study online, supported through 22 training centres across the UK for scheduled teaching. Following a reorganisation since the last 2016 HER review, these centres are clustered into five regions led by a Regional Faculty Manager reporting to the Head of Faculty. This model facilitates a centralised approach and strengthens consistency. All staff and students on courses with face-to-face teaching make extensive use of MyKaplan.

2.25 Kaplan adopts a centralised and standardised approach to the provision of facilities, services and infrastructure across its multiple centres and online environment. MyKaplan provides interactive learning content, formative assessment, tests, online study texts, general guidance, various means for students to receive support with any aspects of their course or learning and access to policies and procedures. These resources are supplemented by learning coaches, a centralised support service team, and for apprentices, talent coaches. Interactive learning content is designed by an in-house Instructional Design and Delivery (IDD) team which utilises subject matter experts and experienced instructional designers, some of whom have insight as they also teach.

2.26 Learning resources for each professional qualification have links to the awarding organisations' websites, where there are further resources embedded in the relevant course pages. Tutors provide further guidance.

2.27 The IDD team optimises the performance of MyKaplan and evaluates students' engagement with this. There is close monitoring of engagement and feedback from focus groups ensures issues raised are captured and resolution of these is tracked. Feedback and data inform an Insight Log, which identifies training for staff on how to solve problems faced by students. Extensive use is made of learner analytics software through which feedback from students on their online learning is gathered, used by the IDD team and passed on to academic staff as appropriate.

2.28 The design of both physical and online infrastructure and resources and their associated services allows the Core practice to be met. The team tested how Kaplan facilities, learning resources and student support services work in practice by holding meetings with a range of staff and students, including members of the IDD team, and detailed exploration of the resources available through MyKaplan.

2.29 Prior to the pandemic, MyKaplan provided a highly effective and well developed online learning environment, highly valued by students and staff. Students also use telephone and email for other student support services, such as contacting the progression team, reporting on any reasonable adjustments needed, or sharing their views with the IDD team through a product link on each course page.

2.30 MyKaplan has long been subject to continuous improvement, and is highly praised by both students and staff. A programme of continuous user experience research has been strengthened by a dedicated appointment. Data is gathered through focus groups, surveys and user interaction software to better understand and enhance the online learning experience. External reviews, including those by Ofsted, confirm the effectiveness of this work. Performance indicators, captured in a clear dashboard, record levels of student satisfaction across all MyKaplan-related measures, including quality of online materials, ease of use, quality of support, validity of assessments and retention, show scores being consistently high for the last two years.

2.31 At the start of the COVID-19 pandemic Kaplan rapidly and effectively responded within 48 hours by establishing live online teaching for 14,000 users. An extensive series of developments and enhancements was rapidly rolled out and designed to ensure student achievement and satisfaction remained high, or improved further. Ongoing work on planned improvements was rapidly scaled up, including a move to digital online platforms which achieved the intention of improving live online reliability. This work was supplemented by a focus on improving online teaching using three new interactive applications, extensive staff training, targeted interventions by Learning Coaches, with a focus on student well-being and engagement.

2.32 Key performance indicators were adjusted, extensive additional learner analytics were introduced and 'pulse checks' with students at the end of each session ensured that Kaplan knew how students and apprentices were engaging, despite disruption to normal study patterns. Using this information interventions were made, and the team created 39 digital booster courses for those awaiting postponed exams. New content was produced and teaching sessions extended to support new students struggling because the pandemic had impacted on their A Level studies. Learning through lockdown microsites for apprentices and Kaplan Instagram Live, which included updates from stakeholders, and support on wellbeing and health were introduced.

2.33 Satisfaction ratings for MyKaplan across all courses are as high or higher than before the pandemic. Student satisfaction with ease of navigation has risen, and live online reliability rose during the pandemic by 10%. Satisfaction levels with the quality of online materials has risen above target. Positive feedback on the speed and helpfulness of the academic support accessed through MyKaplan has risen, and overall feedback on the online learning approach has improved.

2.34 Pass rates remain as high as previously despite the halting of external examinations during the national lockdown. Apprentice learning success rates have dipped slightly but still remain high. Staff report that there has been no perceivable reduction in student retention, with only a small proportion seeking breaks in study. Students confirmed the effectiveness of the learning materials and activities available on MyKaplan, and spoke highly of the quality and accessibility of the live online teaching. The comprehensive and interactive virtual learning environment MyKaplan, which was rapidly developed and enhanced during the COVID-19 pandemic, provides a highly effective resource for student learning and makes a particularly positive contribution to student achievement and satisfaction, and is **good practice**.

2.35 Preparations for post-pandemic activity is now underway with an external research project commissioned, involving a large group of representative students. The project report is intended to provide recommendations on the future of digital learning, while recognising that an element of classroom-based study may remain valued by students. An internal project is also underway to evaluate whether a more blended learning approach to the ACA courses could be adopted. Kaplan gained a bronze award in the nationally recognised Learning Technologies Awards for 2020.

2.36 Kaplan provides sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience. MyKaplan is a clear, helpful and supportive tool for students and tutors for use on all courses and modes of study. The Core practice is met and the level of risk is low.

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

Findings

2.37 Kaplan's Teaching and Learning Strategy states that Kaplan continually receives and responds to feedback from students which informs the review and enhancement of teaching and learning opportunities. Kaplan has formal processes for obtaining, collating and reviewing student feedback on learning and teaching and on the support underpinning the student experience which allow the Core practice to be met.

2.38 The review team examined student survey data and associated documentation and held meetings with staff and students to confirm their understanding of how students are engaged both individually and collectively. The processes and procedures in place would allow the Core practice to be met.

2.39 Following a recommendation in the 2016 HER report, Kaplan revised its system for obtaining and acting upon student feedback. An electronic end-of-course feedback survey replaced the previous paper-based model to ensure accessibility for remote learners. An annual student satisfaction survey replaced a previous bi-annual questionnaire in order to reduce survey fatigue. Feedback questionnaires are regularly reviewed to ensure their continued relevance. The annual satisfaction survey, covering non-course specific features of the student experience, is agreed with senior managers annually. Students commented that tutors encouraged them to complete course feedback surveys and that a digital prompt appeared through MyKaplan.

2.40 The 2019 student satisfaction survey across accountancy, tax and financial management achieved an overall response rate of 12.4%. The response from nearly 5,000 students was sufficient to allow effective conclusions to be drawn. In order to increase participation Kaplan is working on making the purpose of the satisfaction survey clearer to students through an annual 'You said we did' publication. An annual email is sent to students giving examples of actions taken previously in response to feedback. Students had little direct awareness of these initiatives but were informed through tutors of matters addressed as a result of student feedback.

2.41 In addition to surveys, students have the opportunity to provide individual feedback through online rating systems, and through informal conversations with their tutor. A link on MyKaplan enables tutors to provide informal feedback to the product team on student comments.

2.42 Kaplan uses a net promoter score system (NPS) based on survey data as the key metric to measure the overall level of student satisfaction. Scores are tracked by qualification and delivery channel and benchmarked against an internal target.

2.43 Effective systems have been developed for reviewing and acting on feedback from students and other stakeholders. All feedback data are analysed by the Reporting and Insight team and the findings sent to the Product team and to the senior managers and the Professional Leadership teams. The results are compared with agreed targets, and action plans for improvement are created. In addition to quantitative data, student comments are reviewed and acted upon as necessary. An Insight Log maintained by members of the Product team includes formal and informal feedback from students and other stakeholders, and records actions required, and taken. Progress is monitored at monthly meetings of senior managers.

2.44 Student feedback data are used to inform initiatives for the following year, including process changes, product changes and improved communication with students. There are clear

examples of how student feedback has led to improvements in MyKaplan and other aspects of the provision.

2.45 For the 2019-20 academic year, review processes have been formalised into a quarterly review led by the Reporting and Insight team to identify emerging themes, ensure a cross-organisational approach to enhancement, and avoid duplication of effort or omission. During the pandemic, Kaplan has used targeted surveys to provide a more rapid response to student feedback.

2.46 Collective student engagement has been primarily through the use of student focus groups for specific programmes of user experience research. A large group of volunteers has been established from which students will be selected to participate in focus groups planned for 2021.

2.47 For students on apprenticeship programmes, an Apprenticeship Advisory Panel has been established with 12 student representatives covering the full range of standards. The Apprenticeship Advisory Panel met for the first time in September 2020 and plans are in place to hold virtual meetings four times per year.

2.48 Kaplan has developed effective processes for obtaining, reviewing and acting upon individual and collective student feedback on their educational experience in line with the Teaching and Learning Strategy. The Core practice is therefore met, and the level of associated risk is low.

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

Findings

2.49 The Complaints Policy is available to students on MyKaplan and identifies the types of complaint that can be made, the principles underpinning the complaints process, the procedures for making a complaint, and the process for appeals.

2.50 The review team tested the operation of the complaints procedures, and the availability of information on complaints and appeals, by examination of relevant documentation and through meetings with staff and students. The Complaints Policy and associated procedures, and its availability to students enrolled on Kaplan's courses allow the Core practice to be met.

2.51 The Complaints Policy comprehensively describes the complaints procedure and protocols and the principles of objectivity and confidentiality and advice available which govern the process. The grounds on which a complaint can be made are clear. Kaplan's complaints policy is included in the video used during student induction and is also found in the documentation provided for each course. Information is accessible and can be enhanced through adjustment of font size and colour and screen reader support. Students confirmed that they knew how to access the complaints policy, or knew where to ask for advice on making a complaint.

2.52 Students are advised initially to raise complaints informally with Kaplan staff, and almost half are resolved at this stage. Complaints team staff receive training on the conduct of the process. Formal complaints are submitted centrally to the Complaints Team within Student Services and Progression. Complaints can be submitted by email, post or through an online complaint form. Receipt of a formal complaint is acknowledged by the complaints team within 24 hours. In accordance with Kaplan's commitment to ensuring equality of opportunity, students submitting a complaint are encouraged to disclose any disability or specific learning requirements to enable necessary adjustments to be made.

2.53 Formal complaints are investigated by the relevant specialist supervisor, who acts as an independent complaints officer. The aim is to complete the investigation and inform the student of the outcome of a formal complaint within 14 working days. This target was met in nearly all cases. Where the complaints process will take longer, the complainant is informed in writing of the reason for the delay and the new resolution date.

2.54 The basis for making an appeal against the outcome of a complaint investigation is clearly described within the Complaints Policy. Appeals may be submitted in writing to the complaints team within seven working days, stating the grounds for the appeal. Appeals are considered by a senior manager selected to avoid any potential conflict of interest, who will take into account any previous attempts at resolution and provide a decision within 10 working days. If the complainant remains dissatisfied with the outcome of their complaint, details of how this may be referred to the qualifications awarding body or to the regulator are provided on request.

2.55 A complaints tracker is used to group complaints into themes and emerging issues are discussed at regular product team meetings and data are collated and reported to senior managers monthly. There is a focus on addressing any emerging trends or themes and any changes that may be required to enhance the student experience. For specific complaints regarding funding, the Education and Skills Funding Agency procedure is followed.

2.56 Academic appeals are made directly to the awarding organisation. Information on exams for each awarding organisation is available on Kaplan's website and advice on an academic appeal can be provided by tutors, coaches and specialist support teams. The

students stated they would approach the talent coach or go to their employer or director for advice on making an academic appeal.

2.57 Kaplan has fair and transparent procedures for handling complaints and appeals which are accessible to all students. The Core practice is met and the level of associated risk is low.

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

Findings

2.58 Kaplan does not offer research degrees.

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

Findings

2.59 Kaplan has grown the number of higher degree apprenticeship programmes delivered in partnership with a number of organisations. At present there are more than 9,000 students studying at Level 4 or above. For the vast majority of these, the partner supports only workbased learning linked to the apprenticeship standards. This provision is also subject to review by Ofsted and the Office for Students (OfS). Kaplan works with other organisations on the delivery of the professional courses, subcontracting out either all aspects of an apprenticeship programme to main providers or refering subject specialist elements to supporting providers.

2.60 Following a significant strategic review and reduction in the number of subcontractors, Kaplan now has three main providers for apprenticeships at Level 4 and above. Kaplan defines these as trusted organisations: Aston University, Birmingham City University and Firebrand Training Limited. There are fewer than 17 students overall across these three partners who deliver five apprenticeship programmes on its behalf. Kaplan additionally works with four supporting providers who contribute elements of the specialist knowledge needed for some courses.

2.61 There is a separate management structure and staff team for the apprenticeship programmes which differs from Kaplan's standard professional programmes owing to the workbased learning element, different regulatory body and inspection methodology. The Head of Quality and Equality now has oversight over apprenticeships and conventional courses in a move designed to strengthen quality assurance of the apprenticeship provision. Kaplan apprenticeship subcontractor arrangements are approved by the Kaplan Board, with contracts signed off by the Managing Director. Its Subcontractor Standard Operating Procedure includes provisions for due diligence, performance monitoring and quality assurance.

2.62 Kaplan adopts a risk-based approach to monitoring subcontractors, varying the frequency of performance meetings and observations according to the level of confidence and track record. Apprentice observations and interviews are conducted by the Head of Quality and Compliance at least twice a year and the outcome of these, together with performance data and other quality-related matters, are discussed at regular quarterly meetings. There is also a formal monthly review by senior managers which includes a focus on subcontracting arrangements.

2.63 The team explored how these subcontracting arrangements work in practice by holding meetings with a range of staff, apprenticeship students and two partners, together with consideration of recent reports from Ofsted and the OfS, key performance data relating to apprenticeships and improvement plans. These arrangements allow the Core practice to be met.

2.64 The newness of higher degree apprenticeships and the low numbers on each course has meant there has been limited meaningful statistical analysis of the apprenticeships delivered with a subcontractor. Recent reviews by Ofsted and OfS, and performance indicators for self-managed apprenticeships confirm that these are working well. The recent OfS report expressed confidence in Kaplan's capacity to deliver high-quality tuition for Level 6 and 7 apprenticeships. The report confirms that there are effective arrangements to ensure that high-quality apprenticeships are delivered, irrespective of where and how they are delivered and who delivers them. Kaplan has continued to focus its apprenticeship programme on areas where there is in-house expertise, reducing the number of subcontractors with whom it is in partnership.

2.65 Subcontractors confirmed that they have good levels of communication with Kaplan Financial and feel that they are trusted and valued partners with a relationship that is working well for both parties.

2.66 There are effective systems in place for working in partnership with other organisations and ensuring a high-quality academic experience for its students studying under subcontracted arrangements. The Core practice is met and the level of associated risk is low.

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

Findings

2.67 Kaplan provides a high level of support to students to ensure that they are fully equipped to succeed and achieve their career aspirations. Support includes employing highly qualified tutors to deliver course materials. Additionally, Kaplan employs a range of support and advice staff, including Students' Service Advisors, who assist students with course and examination administration, Learning Coaches, Academic Support Tutors, Talent Coaches and a Student Experience Team. Some staff, such as the Talent Coaches, work specifically with apprentices, providing one-to-one support.

2.68 The team tested Kaplan's approach to ensuring it has effective processes in place to support students to achieve successful academic and professional outcomes by holding meetings with a range of staff and students, reviewing staff resources and analysing annual surveys, minutes of meetings and other documentation. The processes and procedures in place would allow the Core practice to be met.

2.69 Students can access learning materials through the virtual learning environment, MyKaplan, and have access to a wide range of study options. These include Classroom, Live Online, On-Demand and Distance Learning, or a blended learning approach. Students work independently to a suggested timetable, with monitoring and support from the coaching team. Distance learning students study primarily from textbooks, accessing selected online content for additional support.

2.70 There is a range of accessible and assistive facilities to support students with hearing or sight impairments, and extra learning support as appropriate. Student Satisfaction Survey data on learning resources is generally very positive, and students are complimentary about the range and extent of support provided, particularly during the COVID-19 pandemic. Kaplan also confirmed that all teaching had now moved to a virtual platform. This matter is addressed as good practice in paragraphs 2.31 to 2.36.

2.71 As awarding organisations have moved from fixed exam timetables to an on-demand model, processes have been put in place to support students, including the 'nudge' system on MyKaplan which reminds students to book examinations. While there is evidence that some of these measures are working, the impact has not been significant and Kaplan recognises that further work is required to respond to the new on-demand examination model.

2.72 There is a wide range of effective processes to ensure that students and apprentices are able to continue with their studies and that the support is effective during the pandemic. This support has included providing fully live online access to learning materials within 24 hours of the national lockdown, continued engagement with employers and booster resources to keep students actively engaged, and a move to an online timetable. To support this level of activity Kaplan has created a new performance indicator around student engagement to monitor and evaluate impact. A student survey undertaken in April 2020 was highly positive, with students indicating that they had been provided with effective academic and pastoral care. For example, in addition to providing support for students academically, Kaplan has also developed a student health and wellbeing social media live event, strategies to promote mental health and use of guest speakers, all of which have proved popular. In addition, apprentices who had been furloughed have been supported.

2.73 Students are well supported though a wide range of mechanisms and through well qualified tutors and a wide range of focused support and advice staff. There are effective

processes in place to support students in achieving successful academic and professional outcomes. The Core practice is met and the level of risk is low.

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

Findings

2.74 Kaplan works with a large number of awarding organisations and within a number of different regulatory frameworks. To ensure that it meets the needs of each, including *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) and the Quality Code, it takes a largely centralised approach to the management of quality and reviews its core practices for quality within this context. A recent review and reorganisation led to greater centralisation of the management of quality, including the establishment of two key posts: Director of Apprenticeships and Quality and Equality Manager.

2.75 The Quality and Equality Manager has oversight of quality for professional awards and its apprenticeship programmes and plans to gradually review all aspects of quality management. The aim is to streamline quality-related reports to develop documentation that meets the multiple needs of different external regulators as well as internal stakeholders. Internal management teams have their own local quality processes which they review and refresh.

2.76 A mapping process was undertaken to assure Kaplan that its policies and procedures are aligned to the Quality Code. In response to the introduction of the revised Quality Code in 2018 Kaplan has begun a process of ensuring that policies, procedures and products are reviewed and aligned to the Expectations and Core and Common practices. The Teaching and Learning Strategy has been recently developed, taking account of the new Quality Code. This approach to reviewing core quality practices allows this Common practice to be met. During meetings with staff and students and consideration of meeting logs, reports and key performance data, the team explored how this approach works in practice.

2.77 The 2016 HER report identified two recommendations related to reviewing quality. One recommended a formal process be developed and implemented to ensure regular and systematic programme monitoring. Following this, Kaplan has strengthened its range of monitoring activities, including monitoring class sizes and the curriculum content. A monthly performance indicator report analyses customer response times, student satisfaction with tutors and academic support, and examination pass rates. Bi-annual Learning Review meetings take place with senior managers from the parent company, Kaplan Inc., and provides a platform for sharing good practice. Kaplan plans to enhance these measures further with quarterly reviews at programme level, which will recommence when the 2020 student survey outcomes are known.

2.78 Key performance indicators (KPIs), set and reviewed (including during the pandemic) by the Professional Leadership team, are reported up to Kaplan UK's Executive Leadership team in a monthly meeting and are disseminated to all staff in a monthly email. Further measures have been taken to gather feedback from students, including focus groups and a dedicated user experience researcher focusing on the students' online learning experience. This feedback is collated into an Insight Log which is regularly considered by senior managers. These measures effectively support Kaplan to review and drive improvement in the quality of its academic provision in a systematic and evidence-based manner.

2.79 The second 2016 HER report recommendation was to strengthen the organisational engagement with the Quality Code to enhance the quality of student learning opportunities. The new Quality and Equality Manager intends further to embed the Quality Code comprehensively into quality systems and processes as they are reviewed and developed. This approach was evidenced during the development of the new Teaching and Learning Strategy and as part of an ongoing review of equality, disability and inclusion. The Training Academy staff resource

centre on MyKaplan now has information and guidance on the revised Quality Code. This includes a video briefly explaining the Quality Code to staff. Staff met by the team confirmed that they are aware of the new Quality Code and understood their role in engaging with its core principles.

2.80 Kaplan regularly reviews its core practices for quality and uses the outcomes to drive improvement and enhancement. It has further centralised the management of quality and its monitoring and review processes. The Common practice is met and the associated level of risk is low.

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

Findings

2.81 Kaplan has multiple connections and working relationships in which it takes account of external expertise in manging the quality of its provision. Each Product Manager has responsibility for developing appropriate programmes of study to meet the needs of students and clients, and works closely with the awarding organisation to achieve this. Content Specialists within Kaplan Publishing work with their respective awarding organisation to ensure that the relevant syllabi and exams for each qualification remain current. The Apprenticeship Governance Board, made up of external members who act as a critical friend, ensures that the provision is robust in meeting the needs of students. Other staff also attend various external training courses, such as a recent Ofsted event that focused on the new Education Inspection Framework.

2.82 The review team explored a wide range of evidence, including reports and minutes of meetings and information prior to meeting with relevant staff and students. The close working relationships with many awarding organisations and the various other arrangements in place, including the Apprenticeship Governance Board, allow the Common practice to be met.

2.83 Meetings with staff confirmed how the relationship between Content Specialists and awarding organisations work in more detail. There are around 50 Content Specialists, some of whom are also tutors, who work closely with awarding organisations, attending conferences and reflecting changes in the learning material and producing new e-learning materials, when appropriate.

2.84 The Apprenticeship Governance Board role is to challenge existing practice to better support and assist the delivery of high-quality provision. Meetings are being regularly monitored by senior staff to ensure their effectiveness and assist in their development. The review team confirmed that the agenda and discussions have been further developed and have become more relevant and focused in content.

2.85 Kaplan meets the responsibilities for the Common practice by working closely with each awarding organisation, primarily through the role of Content Specialists and Product Managers. The ongoing development of the Apprenticeship Governance Board in adopting a more robustly challenging role further bolsters the use of external expertise in improving the quality of its provision. The Common practice is met and the associated level of risk is low.

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

Findings

2.86 Kaplan utilises a number of methods to ensure that it engages students individually and collectively. Extensive use if made of ongoing course feedback surveys which students complete throughout the year. The Annual Satisfaction Survey provides the net promoter score, which is then used directly to explore and rate how the organisation is performing on a year-toyear basis. Kaplan reports effectively to students on what actions have been taken to respond to their feedback, and creates an annual 'You Said, We Did' document which is shared with all students. Additionally, students can provide feedback directly through MyKaplan on their experience and the associated content. Kaplan has recently created a virtual Apprenticeship Advisory Panel made up of its students. This is intended not only to gain the views of its apprenticeship students, but also to enable them to engage in discussions more directly.

2.87 The review team explored the submitted evidence and information prior to meeting relevant staff and students from Kaplan. The various approaches that Kaplan takes to engage students both individually and collectively allow this Common practice to be met.

2.88 The virtual Apprenticeship Advisory Panel plans to meet quarterly and inform discussions of the Senior Management Team and the External Assurance Board. Prior to students taking up their roles on the panel, students will receive appropriate training, support and guidance to become full and effective contributing members. Students are not yet fully aware of the role and responsibilities of the Apprenticeship Advisory Panel but the review team was confident that more widespread knowledge of its role would be effectively disseminated as it becomes embedded in practice. Discussions and actions emanating from the interim review meetings with Kaplan have already provided feedback to the Equality, Diversity and Inclusion Committee and have informed the work of the communications and marketing teams. This feedback is informing working practices and responsibilities, and is a demonstration of how the work of this new panel can enhance the student experience.

2.89 Students are engaged individually and collectively in the development, assurance and enhancement of the quality of the educational experience. The Common practice is met and the associated level of risk is low.

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.

2.91 All relevant Core practices and Common practices are met and the associated level of risk is low in all areas. There is one area of good practice in the comprehensive and interactive virtual learning environment MyKaplan which provides a highly effective resource for student learning and makes a particularly positive contribution to student achievement and satisfaction. There are no recommendations or affirmations.

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

Glossary

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

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

Academic standards

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

Award

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

Awarding organisation

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

Blended learning

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

Common practices

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

Core practices

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

Credit(s)

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

Degree-awarding body

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

Distance learning

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

Dual award or double award

The granting of separate awards (and certificates) for the same programme by two

degree-awarding bodies who have jointly delivered the programme of study leading to them. See also **multiple award**.

e-learning

See technology enhanced or enabled learning.

Expectations

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

Flexible and distributed learning

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

Framework

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

Framework for higher education qualifications

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

Good practice

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

Learning opportunities

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

Learning outcomes

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

Multiple awards

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

Operational definition

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

Programme (of study)

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

Programme specifications

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

Quality Code

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

Reference points

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

Self-evaluation document

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

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

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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