



Educational Oversight for Embedded Colleges: report of the monitoring visit of Kaplan International Colleges UK Ltd, April-May 2019

Outcome of the monitoring visit

1 From the evidence provided in the annual return and at the monitoring visit, the monitoring team concludes that Kaplan International Colleges UK Ltd is making commendable progress with continuing to monitor, review and enhance its higher education provision since the [April-May 2018 annual monitoring visit](#).

Changes since the last QAA monitoring visit

2 Kaplan International Colleges UK Ltd, trading as Kaplan International Pathways (Kaplan Pathways), is part of Kaplan Inc, a private provider of education. Kaplan Pathways was established in 2005 with the aim of developing a network of international colleges providing progression routes for international students wishing to enter UK higher education. Kaplan Pathways has eight international colleges which are embedded college arrangements with a partner university, and Kaplan International College London (KIC London) provides pathways offering progression to several universities. There is a further International Pathway college with the University of York, for which Kaplan Pathways is responsible for marketing and recruitment, and delivering student support and welfare provision.

3 In the 2019 annual monitoring round, visits took place to Kaplan Pathways Headquarters (Kaplan Pathways HQ), Glasgow International College (GIC), The University of Nottingham International College (TUNIC) and Kaplan International College London (KIC London). This report covers the outcome of the monitoring visit to the Kaplan Pathways HQ in London in April 2019, with associated separate reports covering the monitoring visits to KIC London, GIC and TUNIC in May 2019. Visits were not required to a further four Pathway colleges which were included in the annual return. A further three colleges operate in the UK but were not covered by this round of annual monitoring.

4 At the time of the annual monitoring return, the overall student number headcount for the seven colleges included, was 4252 - representing a small increase of 1.2% compared to student numbers in the comparable period in 2018 (4201). Percentage changes in student numbers vary across the colleges, with the most significant changes (increases of more than 20%) being reported for TUNIC and Glasgow.

5 There have been no changes to senior staff at Kaplan Pathways HQ since the 2018 annual monitoring visit. There have been recent changes at several Colleges including TUNIC (an increase in the number of permanent teaching staff and extension of premises), KIC London (extension of premises) and University of Brighton International College (a temporary change of College Director). A new college, the University of Essex International College (UEIC), opened in Autumn 2018.

Findings from the monitoring visit

6 The provider is making commendable progress with continuing to monitor, review and enhance its higher education provision. Identified actions are being taken forward and a number of further enhancements have been introduced (paragraphs 8-9). The academic standards and quality of learning opportunities of the provision are being maintained (paragraph 15-17). Information produced by the provider for its intended audiences, about the learning opportunities it offers, is fit-for-purpose, accessible and trustworthy (paragraph 11). The provider demonstrates effective engagement with relevant external reference points, including the Quality Code for Higher Education (Quality Code) (paragraph 19).

7 The most recent Higher Education Review (Embedded Colleges) of Kaplan Pathways HQ in June 2016 made two recommendations relating to governance arrangements at KIC London, and complaints and appeals procedures. The 2018 monitoring visit found that the first recommendation was fully met. The second was partially met, with an action outstanding concerning confirmation to students on the availability of independent recourse following completion of procedures. It was established that this action would be fully addressed once Kaplan International Pathways is registered with the Office for Students and is a member of the Office of the Independent Adjudicator, therefore, all the actions from the 2016 review had been completed as far as possible.

8 The 2018 monitoring report noted that although Kaplan HQ did not submit an action plan on its central operations to support its annual monitoring return submission, the senior management team had identified the Product Review (a review of curriculum offering across the colleges) and the extension of the Digitisation of Assessment Project as key development priorities. The Product Review has now been completed, developed programmes are on offer for September 2019, and elements of the new curriculum are being delivered at UEIC in the current year. The digitisation project, initiated in 2016, has led to the introduction of digitally-delivered formative and summative assessments and diagnostic tests across the colleges by the end of 2018. Following a full evaluation, a report on success metrics, student feedback and lessons learned was presented to the final Project Board in December 2018. Next steps are focused on embedding the use of digital tools and resources as part of the content development stage of the Product Review.

9 The provider action plan provided for this monitoring visit was based on strategic themes, incorporated commercially-based items and set out headline end-of-year KPIs for student recruitment, completion, progression and student satisfaction (envisaging action at college-level to meet college-specific targets). Actions relating to the enhancement of student learning opportunities were focused on the development of learning, teaching and assessment materials for the roll-out of the outcomes of the Product Review. Associated work streams had been established and were operational, supported by an associated staff development programme led by the Centre for Learning Innovation and Quality (CLIQ). One feature of the revised curriculum is the incorporation of Active Learning weeks which focus on application of learning, building on themes such as entrepreneurship, globalisation and getting to know your local environment. A number of further enhancements, though not included in the action plan, have been introduced and were being monitored by senior staff. An online Degree Finder facility for applicants and an online internal dashboard, which provides easy access to data from the student experience survey, have been developed and were well received by stakeholders. A standard template for data on students' performance on the university programmes to which they progress has been introduced and has been used by many university partners. A new student management system, which will ultimately incorporate student accessible space, was under development and due to be launched in summer 2019.

10 Recruitment, selection and admissions processes are managed by a central team and/or through Kaplan Partner Services in Hong Kong. In-country recruitment is undertaken by Kaplan Partner Services in Hong Kong through its management of overseas offices, regional staff based overseas and a network of agents. The agent 'on-boarding' process covers due diligence, monitoring, training and termination. The ratio of in-country staff to agents (1:6), allows for effective support and monitoring. Agents can access resources, including training videos and webinars, training from Kaplan Pathways staff overseas, and have opportunities to attend in-region events and college visits. Admissions teams are trained internally and may also attend appropriate external training such as NARIC.

11 The Kaplan Pathways, college websites and printed prospectuses provide applicants with extensive information about the pathways, entry requirements, terms and conditions, and the application process. Online links signpost the generic Kaplan Universities Pathway Guide, college-specific prospectuses and partner university websites. Helpful flowcharts set out the application process. Applicants declaring a disability or support requirements receive information on the additional support that can be provided by the relevant college, or may be offered the option to enrol at another college where the physical infrastructure is more suited to their needs. Pre-arrival guides remind students to bring original qualification certificates, with certified translations as appropriate, to enrolment. Clear policies and processes operate for producing, checking and signing off externally published information to ensure accuracy and fitness for purpose.

12 The comprehensive Kaplan Pathways Admissions Manual is under continual review and guides staff through decision-making, provides links to college/university-specific entry requirements, and specifies the academic checks required. Entry requirements are determined by Kaplan Pathways, in agreement with university partners, and are reviewed every two years in the light of student performance data. Admissions staff receive training on assessing applications to programmes with additional entry requirements, such as interviews and portfolios. Borderline and non-standard applications require scrutiny by senior admissions staff, including assessment against any university-agreed tolerance band. A decision may be sought from the relevant university, and lower academic entry criteria may be considered during university clearing periods.

13 Robust, clearly-documented processes ensure that students have sufficient English language competence to complete their programme. Unless an exemption applies, applicants must have passed a UKVI approved Secure English Language Test (SELT) at the appropriate level. Where deemed necessary, other indicators - such as specified external tests or one of the two bespoke Kaplan Pathway tests - are used to determine the length of any English study requirement on the programme. All applications are for both the Kaplan Pathways programme and the chosen progression degree. Offer letters, which set out all relevant conditions, are signed by the College and University. Any applicant holding an offer for a pathway or degree course which is closed before enrolment, is offered alternatives (such as a similar course at the same or another college/university, a later intake or a deposit refund). The monitoring team was assured that course closures after admission would only occur exceptionally and that any such case would be handled by senior staff, where necessary in negotiation with the partner university. There is an online admissions feedback, complaints and appeals facility, and a clear process for handling and responding to complaints and appeals.

14 The framework and processes designed to ensure the rigour, fairness and integrity of assessment are robust and clearly documented. Responsibility for academic standards and quality rests with the provider Academic Planning and Quality Committee (APQC). College programme committees are charged with continuous monitoring, including scrutinising progression, completion and achievement data, considering external examiner reports and approving the annual programme monitoring report (APR). APRs are considered

by Joint Academic Boards (convened jointly between individual colleges and partner universities) and inform the Academic Standards and Quality of Programmes report, produced by CLIQ for submission to APQC.

15 The Kaplan International Pathways Quality Assurance Framework articulates the principles governing academic standards and quality. The Academic Standards and Quality Manual (ASQM) provides the definitive framework for assessment. Principles, responsibilities and processes are set out in various chapters covering assessment regulations, marking and quality assurance, external examining, feedback to students, assessment boards, academic appeals and academic misconduct. The Assessment Development Guide produced by CLIQ details requirements for assessment development, the use of assessment criteria and marking schemes, standardisation, internal moderation, and external examiner scrutiny. Implementation is supported by a range of appended flowcharts and templates, together with grade descriptors and other supplemental documentation such as the detailed procedure for internal moderation. Colleges must provide staff induction and development to ensure that assessment roles and responsibilities are understood and can be carried out effectively. At provider level, CLIQ plays an active role in the provision of staff development and training materials for learning, teaching and assessment. The role of external examiners, and processes for appointment, are fully documented. External examiner reports are appended to APRs, reviewed by CLIQ staff and inform the Academic Standards and Quality of Programmes report.

16 Processes to deter, detect and penalise academic misconduct are appropriate, formally documented, and summarised in student-friendly format in the student guide. Provider senior staff attendance at college/university joint academic boards provides an effective mechanism for oversight of the operation and outcomes of local academic misconduct processes. Under ASQM provisions, marked coursework is normally returned within 10 working days of submission. Colleges are expected to consider how constructive feedback may be given on examination scripts, which are normally not returned. Policy and guidelines for alternative assessment arrangements for students with disabilities demonstrate a supportive approach and a desire for fairness and equity in assessment.

17 A 'student-facing' version of the assessment regulations, for incorporation into student handbooks, sets out rules on marks and grading, module failure, and termination of studies, together with the core elements of appeals, academic misconduct and exceptional circumstances processes, referring students to further available information. There is a well-documented APL process, although this is primarily used for exemptions from the English Language exit module (where appropriate) as no exemptions are available for academic modules.

18 Academic attainment rates across the Kaplan Pathways college network over the past three years (percentage of students who passed their Kaplan Pathways programme) remained strong, at 90% (2015-16, 2016-17) and 89% (2017-18). Student performance data for individual colleges for 2017-18 shows pass rates ranging between 84% and 97%. The proportion of students who successfully completed their Kaplan programme and met the requirements to progress to their first-choice university was also consistently high, at 87% (2015-16, 2016-17) and 89% (2017-18).

The provider's use of external reference points to meet UK expectations for higher education

19 External reference points are used effectively. Formal policy and process documentation including the Quality Assurance Framework and the Academic Standards and Quality Manual, which are updated annually, demonstrates alignment with the Quality Code and is clearly guided by its precepts. Programmes are aligned with the relevant

qualifications' frameworks and Subject Benchmark Statements, and assessment processes are designed and operated to ensure that academic standards are maintained in line with external reference points. Ongoing action planning by Colleges is informed by, and explicitly mapped to, sections of the Quality Code. Recent developments include staff training on Staff and Educational Development Association (SEDA) standards, which are being introduced to guide and inform programme delivery.

Background to the monitoring visit

20 The monitoring visit serves as a short check on the provider's and its embedded colleges' continuing management of academic standards and quality of provision. It focuses on progress since the previous review. In addition, it provides an opportunity for QAA to advise the provider and its embedded colleges of any matters that have the potential to be of particular interest in the next monitoring visit or review.

21 The monitoring visit was carried out by Ms Julia Baylie, QAA Officer, and Dr Sylvia Hargreaves, QAA Reviewer, on 30 April 2019.

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