



Higher Education Review (Alternative Providers) of Kaplan Open Learning (Essex) Ltd

November 2017

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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 Open Learning (Essex) Ltd. The review took place from 27 to 29 November 2017 and was conducted by a team of four reviewers, as follows:

- Dr Stephen Hill
- Professor Helen Marshall
- Miss Sarah Riches
- Mr Matthew Kearns (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 are the statements in the [UK Quality Code for Higher Education](#) (the Quality Code)¹ setting out what all UK higher education providers expect of themselves and of each other, and what the general public can therefore expect of them.

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

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

The QAA website gives more information [about QAA](#)² and explains the method for [Higher Education Review \(Alternative Providers\)](#).³ For an explanation of terms see the glossary at the end of this report.

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

² QAA website: www.qaa.ac.uk.

³ Higher Education Review (Alternative Providers): www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education.

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 the degree-awarding body **meets** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities **meets** UK expectations.
- The enhancement of student learning opportunities **meets** UK expectations.

Good practice

The QAA review team identified the following features of **good practice**.

- The 21-day trial period before enrolling, which provides students with an effective opportunity to assess whether online learning meets their needs (Expectation B2).
- The highly effective use made of the learner analytics system to identify and support students at risk (Expectation B4).

Recommendations

The QAA review team makes the following **recommendations**.

By May 2018:

- ensure that records of key committees constituting the academic governance structure demonstrate that committee business complies with terms of reference (Expectation A2.1)
- amend the Admissions Policy to more accurately reflect practice (Expectation B2)
- ensure that future recruitment processes for senior academic posts match the experience of appointees to the person specification and job description (Expectation B3)
- introduce a process for checking and auditing accredited prior learning decisions to ensure they are accurately made (Expectation B6).

By June 2018:

- develop and implement documented procedures for the approval of information about learning opportunities (Expectation C).

By July 2018:

- develop documented guidance for implementing internal policies and procedures to underpin the management of academic standards and quality (Expectation A2.1).

About the provider

Kaplan Open Learning (Essex) Ltd (KOL) was established in 2007. Since its inception, KOL has delivered online degree courses in partnership with the University of Essex as the awarding body. The degrees are delivered wholly online through a bespoke learning platform. The provision is branded as University of Essex Online.

KOL was established to develop and deliver a comprehensive range of vocationally oriented online programmes aimed at widening access to higher education to a particular demographic, namely, working adults between the ages of 25-40 years who had not previously had the opportunity to undertake higher education.

KOL's vision is to become a world leader in online learning, making higher education accessible to anyone with the potential and drive to succeed. Its mission is to transform lives and careers by delivering and expanding its suite of innovative, industry-led and career enhancing higher education programmes.

KOL is part of Kaplan International, which in turn is part of Kaplan, Inc. a subsidiary of the Graham Holdings Company (formerly known as the 'The Washington Post Company').

KOL occupies offices in the centre of Leeds and employs 48 permanent members of staff, which equates to 46.6 full-time equivalent, alongside approximately 98 associate tutors and academic content developers, who work on a freelance basis. The academic team is divided into five subject areas: Business, Criminology, Psychology, Law and Health, each with its own head of department known as Head of Subject.

There are currently 1,438 part-time students studying online programmes: 989 of which are undergraduate and 449 postgraduate. The student body at KOL has a strong international character and is geographically diverse. At the end of the 2016-17 academic year, 648 students were studying with KOL from outside the UK, covering 113 nationalities. Thirty-nine per cent of the student body is from outside of the European Union.

The average age of undergraduate students is 32, with an average age of 38 for the postgraduate population. The gender split is 59 per cent female and 41 per cent male. Forty-seven per cent of the student body is from an ethnic minority and 7 per cent of students have a declared disability.

The last full QAA review of KOL took place in November 2013. This was followed by annual monitoring reports in 2014, an annual monitoring visit in 2015 and a further annual monitoring report in 2016. The period since the annual monitoring visit in 2015 has been one of significant growth for the organisation.

As a result of an internal organisational review, KOL recognised the need to consolidate and strengthen the academic oversight of academic standards and expand the involvement of the whole KOL academic community in the management of academic quality and standards. An Academic Board was established, replacing the Faculty Board.

The strategic focus for KOL is to double the student population over the next three years and to develop a broader curriculum at both undergraduate and postgraduate level. In preparation, a new ten-year collaboration agreement has been agreed with the University.

Key challenges identified by KOL include retention and achievement. KOL's delivery is wholly part-time and online, which brings a set of risk factors that KOL monitors through its internal metrics. KOL recognises that part-time mature students have multiple constraints on their time in addition to their studies and this can significantly affect retention rates. The flexible length of study associated with the delivery model often means that students may take longer to graduate.

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

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

a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ)* are met by:

- **positioning their qualifications at the appropriate level of the relevant framework for higher education qualifications**
- **ensuring that programme learning outcomes align with the relevant qualification descriptor in the relevant framework for higher education qualifications**
- **naming qualifications in accordance with the titling conventions specified in the frameworks for higher education qualifications**
- **awarding qualifications to mark the achievement of positively defined programme learning outcomes**

b) consider and take account of QAA's guidance on qualification characteristics

c) where they award UK credit, assign credit values and design programmes that align with the specifications of the relevant national credit framework

d) consider and take account of relevant Subject Benchmark Statements.

Quality Code, Chapter A1: UK and European Reference Points for Academic Standards

Findings

1.1 Responsibility for setting and maintaining academic standards remains with the degree-awarding body, the University of Essex. KOL recognises its responsibility to ensure that courses it develops meet these standards at the outset. All new courses are developed by KOL in line with the University's two-part validation process. Part 1 applies to the application to develop and advertise a new course, and part 2 sets out requirements relating to programme specifications, module outcomes and a narrative account that articulates with the FHEQ, credit values and Subject Benchmark Statements.

1.2 These arrangements would allow the Expectation to be met.

1.3 The review team considered documents relating to University validation procedures, reports of validations and programme specifications. It further tested the evidence in meetings with senior staff.

1.4 The University's validation requirements ensure that appropriate external reference points are articulated with new course developments, and are considered and incorporated into course design and content. This is reflected in course documentation. Programme specifications clearly set out learning outcomes and these are mapped to the FHEQ. Subject Benchmark Statements are used in the course development process. Evidence shows that learning outcomes are matched to the FHEQ and Subject Benchmark Statements. The University's framework is used to specify credit requirements for each programme.

1.5 Staff and students demonstrate good understanding of learning outcomes. This information is available to staff and students from the online learning platform. Recent feedback from external examiners suggested there had been some drift in the matching of assessment design to expected learning outcomes. KOL has acted to address these concerns.

1.6 The degree-awarding body and KOL work together to ensure adherence to the threshold standards set at the national level. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.7 The KOL self-evaluation document for this report states that all courses are aligned to the University of Essex's awards framework. This sets out credit requirements, assessment regulations and thresholds for pass marks.

1.8 Following an internal organisational review, KOL recognised the need to 'consolidate and strengthen the academic oversight of academic standards and expand the involvement of the whole KOL community in the management of academic quality and standards'. The Academic Board was established to replace the Faculty Board in 2016. The Academic Board is chaired by the Academic Director. Other members include heads of academic departments, the Director of Quality and Student Services, the Study Skills Manager and an associate tutor. Course committees are used to monitor programme quality and report to the Academic Board. There is also a Student Satisfaction Group, which reports to the Academic Board. KOL does not consider this group to have committee status; it has no documented terms of reference and meetings are not minuted.

1.9 Boards of examiners are chaired by a member of staff from the University. KOL staff service the boards and the Head of Subject attends. External examiners attend one board each year in person and the remainder remotely. Setting and marking of assessed work is undertaken by KOL academic staff.

1.10 The academic regulatory structure has the potential to provide for the academic governance of KOL's work.

1.11 Under the terms of its partnership agreement with the University, KOL is required to follow its policies and procedures for quality assurance in respect of programme approval, monitoring, review and assessment. In some instances, with the agreement of the University, KOL has modified these to align with organisational structures and responsibilities at KOL, and in recognition of any specific requirement for online delivery.

1.12 The review team is satisfied that KOL currently operates effective processes and fulfils the requirements of the University. However, KOL operates its own internal processes, and although the team concludes that these are effective, they are not underpinned by documented policies and/or procedures. For example, there are no documented internal policy or process on assessment practice, approval of information and marketing material, internal programme design development, and approval and periodic review. In the absence of fully documented advice and guidance, KOL relies significantly on the Quality and Enhancement Department and the University's Partnership Office to provide such guidance. This lack of written guidance places the consistency of decision making and practice at risk. The position is likely to be exacerbated as KOL pursues its strategy to grow its portfolio of programmes and increase student numbers. The review team **recommends** that KOL develop documented guidance for implementing internal policies and procedures to underpin the management of academic standards and quality.

1.13 The review team tested the effectiveness of the existing policies by reading University policies and regulations; internal policies relating to academic standards; and minutes of meetings such as the Academic Board and course committees; and through meetings with senior staff, associate tutors and students.

1.14 Information relating to existing KOL policies is made available to students through the KOL learning platform and the web site.

1.15 The academic regulatory structure, in its design, would allow for the Expectation to be met. However, the evidence reviewed by the team demonstrates that the agendas, membership/attendance and activity of the Academic Board are not fully matched to the stated role and responsibilities set out in its terms of reference. Scrutiny of Academic Board minutes from May 2016 to July 2017 led to a view that, as recorded in the minutes, several areas are not being considered or receiving a reasonable level of scrutiny as set out in the terms of reference. Annual review of courses reports, while being presented to the Board, are not, as reflected by the minutes, subject to rigorous appraisal or review prior to submission to the University. Such a review would provide academic governance of quality and standards as set out in the Academic Board terms of reference (see Expectation A3.3). The minutes of the Academic Board are more focused on the administration of returns to the University rather than academic governance by KOL. Additionally, there is no evidence recorded in the minutes of the Academic Board that there has been any consideration of the business of course committees and the Student Satisfaction Group. It is difficult, from a reading of the minutes, to determine if the business of the Academic Board is being robustly pursued or whether there is a lack of transparency and diligence in recording the work of the Board. The review team **recommends** that KOL ensure that records of key committees constituting the academic governance structure demonstrate that committee business complies with terms of reference.

1.16 KOL complies with the requirements of the University as set out in the partnership agreement. It also operates effective internal procedures, but these are not fully documented. In the judgement of the review team, the absence of transparent documented procedures adds a risk to the continued consistency of decision-making and practice. In addition, the team found that the transparency and accountability of the academic governance committees should be improved through better recording of committee business. These matters become more significant when KOL's proposals, as set out in the development plan, to double student numbers and broaden the range of programmes offered, are taken into account.

1.17 The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

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

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

Findings

1.18 Programme specifications and module outlines form the definitive documents for the provision delivered by KOL. These are prepared by KOL's Heads of Subject, in collaboration with subject experts, using the University of Essex's templates; these are approved as part of the University validation process. They are made available to staff through a shared drive and are also stored on the KOL learning platform for students. The documents are updated annually. Any changes to the documents are subject to the University's course variation procedures. KOL's Quality and Enhancement Team is responsible for the control and management of these documents. Degree certificates are produced by the University; KOL produces an academic transcript and a diploma supplement for graduates.

1.19 These arrangements would allow the Expectation to be met. The review team explored how the Expectation is met in practice by examining relevant policies, procedures and templates, programme specifications, module maps, module outlines, minutes of the Academic Board, tracking mechanisms, and information available through the intranet. The team also met the Academic Director, Heads of Subject and several associate tutors.

1.20 Programme specifications clearly state: external reference points, including the level of the programme within the FHEQ; relevant Subject Benchmark Statements; where appropriate, any professional accreditation; the learning outcomes for the programme; and the learning and assessment methods. The specification also includes a matrix that maps module learning outcomes to programme learning outcomes. Module outlines provide details of the FHEQ level; the credit value; learning outcomes; teaching, learning and assessment methods; and learning resources.

1.21 The University's requirements for making a minor or major change to definitive programme documents are clearly defined; staff complete a course variation form stating the nature of the change and include evidence of consultation with the external examiner, the revised programme specification, module maps and module outlines as applicable. The terms of reference of the KOL Academic Board include responsibility for variations to programmes of study, but there are no formally documented internal procedures to guide staff. The absence of these procedures contributes to the recommendation under Expectation A2.1. The review team noted approval of variations by the Academic Board before transmission to the University for approval by the Dean of Academic Partnerships. The Quality and Enhancement Team keeps track of course variations. Associate tutors are informed when a change is made.

1.22 KOL maintains a definitive record of all programmes and qualifications, which provides a reference point for delivery and assessment, monitoring and review, and the provision of records of study to students. There are effective procedures for making changes to the definitive documents. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (A3.1): Degree-awarding bodies establish and consistently implement processes for the approval of taught programmes and research degrees that ensure that academic standards are set at a level which meets the UK threshold standard for the qualification and are in accordance with their own academic frameworks and regulations.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.23 Ultimate responsibility for the academic standards of new programmes lies with the University of Essex. All proposed programmes are subject to the University's two-part validation procedure: part 1 comprises the process for obtaining outline approval from the University to develop and advertise a new course; and part 2 is validation by the University. KOL has an internal approval process, which is overseen by the Academic Board and coordinated by the Quality and Enhancement Team. KOL has a flowchart summarising internal and external approval processes but has not yet developed a fully documented process setting out internal requirements.

1.24 The review team concludes that the absence of formal documented procedures for internal programme approval, and the consequent reliance on the Quality and Enhancement Team to provide guidance and manage the process, represents a small risk to meeting this Expectation, and contributes to the recommendation under Expectation A2.1.

1.25 The review team analysed how the Expectation is met in practice by considering the policies and procedures of the University and KOL, minutes of meetings, validation documents and reports of validation events. The team also met KOL and University staff and students.

1.26 The decision to develop a new programme is made by KOL academic staff in consultation with the senior management team. If outline approval is obtained internally and from the University, an internal validation panel is normally established to scrutinise the detailed proposal. Panels for internal and University events include external academic members and in some instances employers.

1.27 The internal panel receives a validation document, a programme specification, module map, module outlines, student handbook, study planner and course team CVs. The panel may make recommendations for consideration by the programme team and conditions that must be considered before the proposed programme can proceed to the University's validation processes. Initially, programme teams just received a list of conditions/recommendations but now receive more detailed feedback by way of a full report. If the programme is approved by the University's panel and all conditions met, final approval is given by the University's Academic Quality and Standards Committee, with the decision reported to the Senate. The progress of course developments are tracked by the Quality and Enhancement Team on an Excel spreadsheet.

1.28 Staff involved in programme development have access to the University's guidance and templates, which refer to its academic frameworks and external reference points. Internal panels are asked to consider the programme's alignment with qualification descriptors and Subject Benchmark Statements.

1.29 KOL operates effective approval processes, which ensure that programmes are set at a level that accords with UK threshold standards and the standards of its awarding body. There is, however, an absence of formally documented procedures that support the

implementation of processes. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met

Level of risk: Low

Expectation (A3.2): Degree-awarding bodies ensure that credit and qualifications are awarded only where:

- **the achievement of relevant learning outcomes (module learning outcomes in the case of credit and programme outcomes in the case of qualifications) has been demonstrated through assessment**
- **both UK threshold standards and their own academic standards have been satisfied.**

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.30 KOL has robust shared programme development and validation processes in partnership with the University of Essex to ensure module and programme learning outcomes and assessment methods are formally scrutinised and approved prior to delivery. These include internal KOL validation events using University procedures. KOL's Academic Board signs off programmes to go forward to the University for validation. Assessment arrangements, and programme and module learning outcomes, are scrutinised to ensure appropriateness and alignment with the FHEQ during validation processes. Any changes are subject to the course variation process (see Expectation A2.2).

1.31 KOL has policies for marking assessed work, handling academic offences and accredited prior learning (APL), all of which are aligned with University policies. Six per cent of enrolled students have approved APL giving credit towards part of their programme. The assessment and moderation of learning outcomes is conducted in accordance with the Online Learning and Teaching Strategy, Marking Policy and Academic Offences Policy. Validated module descriptors state the learning outcomes, and summative assessments are linked to learning outcomes outlined in the module descriptor.

1.32 KOL has responsibility for the setting of assignments, and their first and second marking. Boards of examiners receive reports from pre-board meetings, scrutinise module results and confer named awards. The Academic Board is responsible for oversight of quality and academic standards of all programmes, receiving reports from boards of examiners. It is noted that KOL has yet to establish systematic processes for the reporting of achievements and degree classifications, which the review team was informed is to be implemented in the 2017-18 academic year.

1.33 The design of the system and procedures in place would allow the Expectation to be met. The review team explored the effectiveness of the approach by considering documentation relating to the award of credit and qualifications, and in meetings with staff and students.

1.34 The programme and module production and validation process provide a clear and detailed outline of the steps required for internal and external verification and approval of module assessment tasks. The Marking Policy and guidance documents state the learning outcomes that will be tested by the given tasks and the assessment criteria that will be used to judge performance. External examiners scrutinise assessments, assessment criteria and the marking guide after their use as part of their scrutiny of marking. At the time of the review there was no documented process for the creation and approval of assessment tasks, and no process of internal verification of assessments prior to use, which contributes to the recommendation under Expectation A2.1. The review team was assured by KOL that work is underway on the development of such documentation. Additionally, assessment briefs are re-used for subsequent iterations of modules, which KOL believes is mitigated by

the contextual nature of the assessment tasks and through the use of plagiarism-detection software.

1.35 Qualifications are awarded in accordance with the academic regulations at boards of examiners, which are attended by external examiners. External examiner reports confirm that academic standards are met and that these are comparable to other higher education providers.

1.36 The processes in existence for the approval and verification of assessments, together with the assurance of external examining processes, result in the Expectation being met. However, the cumulative impact of the yet-to-be implemented procedure for reporting achievement; the lack of documentation detailing the process for creating and approving assessment tasks; and, notwithstanding mitigating factors, the frequent re-use of assessment briefs, results in a moderate level of associated risk.

Expectation: Met

Level of risk: Moderate

Expectation (A3.3): Degree-awarding bodies ensure that processes for the monitoring and review of programmes are implemented which explicitly address whether the UK threshold academic standards are achieved and whether the academic standards required by the individual degree-awarding body are being maintained.

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.37 The processes and procedures for monitoring and reviewing of programmes follow those of the University of Essex and are set out in the KOL Annual Review of Courses Flowchart. Annual reviews of courses are completed by the Heads of Subject and are informed by the end-of-module surveys completed by students, and external examiner reports. The aim is the enhancement of provision through review of performance data such as National Student Survey and Destinations of Leavers from Higher Education data, and reflection on external examiner, student and associate tutor feedback. Annual review of courses reports and action plans are submitted to the November meeting of the Academic Board for review, prior to submission to the University. Programme and module variations use University policies, with the KOL Quality and Enhancement Team providing initial guidance to staff seeking such variations.

1.38 The design of the monitoring and review procedures would allow the Expectation to be met. However, the explanation of the procedures is limited to a flowchart. To test the effectiveness of the approach, the review team considered the KOL Annual Review of Courses Flowchart and annual monitoring documentation relating to programmes offered by KOL, and met staff and students.

1.39 Annual review of courses reports are, as required by the terms of reference, considered at Academic Board meetings, after which they are submitted to the University. An institutional annual monitoring report is produced by the KOL Academic Director, informed by subject-area annual review of courses, and submitted to the Academic Board for review in January, following which it is submitted to the spring University Partnership Education Committee. The review team noted from its reading of Academic Board minutes that consideration of annual review of courses reports was limited to a discussion of the shape and content of the report, rather than constituting a review of the annual reports that might reasonably be expected to evaluate the standards and quality of a programme (see Expectation A2.1).

1.40 Periodic institutional review of KOL by the University occurs every five years, the most recent having taken place in 2013, in which KOL was given approval as a partner until 2017-18 when a further periodic review should take place. The outcome of the review is considered by the University Partnerships Education Committee, which will recommend continuation or otherwise of the partnership. Individual KOL programmes are also reviewed by the University every five years to evaluate continuing validity and relevance of aims, outcomes and learning opportunities. The outcomes are reported to the Partnership Education Committee and recommendations go to the University Academic Quality and Standards Committee. The most recent periodic review by the University of KOL validated programmes took place in 2017. This consisted of a review of the undergraduate business programmes, all of which were re-validated until the academic year 2020-21, when a further periodic review should take place.

1.41 Clear reporting lines are in place through the various deliberative committees, ultimately to the Academic Board, and the University's Partnership Management Board and Partnership Quality and Development Committee.

1.42 Processes are in place for the monitoring and review of programmes to ensure academic standards are set and maintained at the appropriate level. However, the absence of internal process and guidance, other than a flowchart, impacts on the risk associated with this Expectation. The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

Expectation (A3.4): In order to be transparent and publicly accountable, degree-awarding bodies use external and independent expertise at key stages of setting and maintaining academic standards to advise on whether:

- **UK threshold academic standards are set, delivered and achieved**
- **the academic standards of the degree-awarding body are appropriately set and maintained.**

Quality Code, Chapter A3: Securing Academic Standards and an Outcomes-Based Approach to Academic Awards

Findings

1.43 In line with University of Essex's requirements, KOL uses external expertise at key stages of setting and assessing academic standards. The approval process for all new courses requires inputs from external academics with relevant expertise and experience. External examiners are assigned to each course by KOL following University procedures.

1.44 The processes and procedures in place would allow the Expectation to be met. The review team tested the effectiveness of these by reading policy documents, minutes of meetings, course validation reports and external examiner reports. They also met senior staff and students.

1.45 The use of external academic expertise occurs at both initial approval and periodic review. Additionally, employer representatives are used wherever appropriate to input to the internal validation process. KOL advertises opportunities through the JISC website to source appropriate expertise.

1.46 KOL proposes external examiner candidates to the University, which KOL source through advertising on the JISC website. This assures a range of applicants that is independent of KOL. Each award has a specific external examiner, with additional examiners allocated to modules. Workload is kept under review by KOL and additional external examiners are appointed as required. External examiners provide annual reports to the University, which are shared with KOL staff and considered at course committee meetings. An annual report on all external examiner feedback is considered by the Academic Board, with a focus on good practice and areas for improvement.

1.47 External examiners are asked their views on academic standards; the setting and maintenance of threshold standards; alignment with the national reference points and PSRB requirements; and comparability with standards in other higher education institutions. The 2016-17 reports seen by review team confirm that threshold academic standards have been maintained. Recently external examiners commented on a perceived drift of assessment practice away from stated learning outcomes for modules. KOL acted upon these comments and has made changes to a number of module assessments as a result.

1.48 The processes in place for ensuring external and independent expertise at key stages of the maintenance of academic standards are effective. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

1.50 Four of the Expectations relating to the maintenance of academic standards are met with a low level of associated risk. Three are met with a moderate level of associated risk. There are no aspects of good practice identified under this judgement area.

1.51 There are two significant recommendations that lead the review team to assess the risk as moderate. The first relates to the need to document guidance for implementing internal policies and procedures. The second recommendation relates to a need to improve transparency and accountability by ensuring that records of key committees constituting the academic governance structure demonstrate that committee business complies with terms of reference. The team is of the opinion that KOL's strategy to grow its portfolio of programmes and increase student numbers adds to the significance of addressing these two recommendations. The moderate risk associated with three of the Expectations is mitigated by the assurance of the University, as awarding body, that KOL meets the requirements set out in the partnership agreement.

1.52 The review team concludes that the maintenance of the academic standards of awards offered on behalf of the degree-awarding body at KOL **meets** UK expectations.

2 Judgement: The quality of student learning opportunities

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

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

Findings

2.1 KOL has a three-year plan for academic development to meet its strategic objectives. The development schedule is produced by the senior management team in consultation with the academic team, and is discussed monthly by the senior management team and reviewed by the Academic Board. KOL's plans are shared with the University of Essex and approved by the Pro-Vice-Chancellor Education. The senior management team must be satisfied about the business case and market demand: the academic team is responsible for the academic merits of the proposed programme. Internal and University validation processes are described under Expectation A3.1 of this report. As noted under Expectation A2.1, KOL has not documented its internal processes for programme approval. KOL mirrors the University's processes and KOL's Quality and Enhancement Team provides support to Heads of Subject and development teams. Alignment with the University's policies and procedures would enable the Expectation to be met, but the absence of fully documented internal procedures and guidance, coupled with reliance on the Quality and Enhancement Team, represents a moderate risk of less rigorous processes being applied in the future.

2.2 The review team explored how KOL met the Expectation in practice by examining relevant policies and procedures, guidance notes, validation documentation and reports of events. The team also met staff and students.

2.3 Course development teams are provided with appropriate support to understand the policies and procedures concerning programme design, development and approval, and this includes new staff being provided with a mentor. Staff are encouraged to consult external academics, employers and relevant PSRBs. Where a new course is being developed in a subject area already delivered by KOL, students and the external examiner are consulted. Internal and University validation panels include independent academic members and (in some instances) employers.

2.4 KOL operates a clear process for the development of online module learning materials, which occurs after the validation of a new programme. The Head of Subject appoints subject matter experts to develop module content and learning resources, working with learning technologists. The Head of Subject reviews the content and approves the material for publication. Once published, the material can only be changed with the approval of the Head of Subject and if necessary through the University, under its course variation procedures. However, as noted under Expectation B3, the person requirements set out in job descriptions do not correspond to the responsibilities of a Head of Subject, and some recent appointees did not meet KOL's minimum expectations in terms of qualifications and experience.

2.5 KOL, in conjunction with the University, operates effective and inclusive processes for the development, design and approval of new programmes. The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

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

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

Findings

2.6 KOL is responsible for the recruitment and selection of prospective students for the programmes it delivers on behalf of the University of Essex. Its policies and procedures for ensuring the fair and transparent recruitment, selection and admission of students are clearly articulated in its Admissions Policy. The effective operation of these admissions policies and procedures would allow the Expectation to be met.

2.7 The review team tested the admissions policies and procedures by examining a range of documentary evidence, including the Admissions Policy, the Admissions Training Manual provided to Student Admissions Advisers, and marketing and induction material. The team also met a selection of students, senior staff responsible for the management of the admissions process, and professional support staff.

2.8 The review team found these admissions policies and procedures to broadly operate effectively. To apply, a prospective student completes an online application form and is assigned a Student Admissions Adviser as a first point of contact. The Student Admissions Adviser subsequently forwards the application to the relevant Head of Subject, who makes an admissions decision.

2.9 The Admissions Policy and programme specifications describe two routes of entry. If prospective students do not meet the academic requirements to apply through the academic entry route, they may apply through KOL's open entry route. Applications are assessed on an individual basis, considering the prospective student's work experience, motivations for undertaking the course and any relevant professional qualifications. However, the review team found that in practice KOL operates three entry routes, with the Admissions Training Manual provided to Student Admissions Advisers, and senior staff the review team met, describing an open access route to certificate of higher education programmes for prospective students without the relevant work experience to apply through the open entry route. The team consequently found a lack of clarity within KOL's Admissions Policy regarding routes of entry which could affect the fair and reliable admission of students. The review team **recommends** that KOL amend the Admissions Policy to more accurately reflect practice

2.10 Student Admissions Advisers conduct a telephone interview with prospective students to inform them about the requirements of online learning; this interview encourages the disclosure of any additional learning needs. Students find the information they receive before commencing their programme accurate and fit for purpose.

2.11 KOL recognises that many of its prospective students may have little previous experience of online learning and as such provide a 21-day trial period, in which prospective students can experience the learning platform and undertake non-credit-bearing learning activities. This period provides an effective opportunity for prospective students to understand the nature of online learning, and the learning and teaching methods of their chosen programme, to assess whether it meets their learning needs. Prospective students are not enrolled until they have undertaken this 21-day trial period and completed the

induction module on the virtual learning environment (VLE). The review team found this trial period to support the valid and inclusive selection of prospective students who are able to successfully complete their programme of study. The 21-day trial period before enrolling, which provides students with an effective opportunity to assess whether online learning meets their needs, is **good practice**.

2.12 Students receive an induction, detailing information about their programme of study, study skills information and academic regulations, and are appointed a dedicated student adviser to support them throughout their programme of study.

2.13 KOL operates fair and effective admissions complaints and appeals procedures and these processes are clearly communicated to prospective students in the offer letter they receive.

2.14 The Admissions Policy is reviewed on an annual basis by the Head of Admissions and the Head of Quality and Student Services. The Academic Board and the senior management team possess oversight over the Admissions Policy and any changes made to it.

2.15 KOL operates fair, reliable and inclusive admissions policies and procedures. There is a need to amend the Admissions Policy to ensure it more accurately reflects practice in relation to admission entry routes. Students are provided an effective opportunity to determine if online learning meets their needs, and receive appropriate support and information throughout the admissions process. The review team concludes the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (B3): Higher education providers, working with their staff, students and other stakeholders, articulate and systematically review and enhance the provision of learning opportunities and teaching practices, so that every student is enabled to develop as an independent learner, study their chosen subject(s) in depth and enhance their capacity for analytical, critical and creative thinking.

Quality Code, *Chapter B3: Learning and Teaching*

Findings

2.16 KOL's Learning and Teaching Strategy sets out its approach to teaching, learning and assessment. This recognises the challenges facing students studying part-time and online. At the heart of the strategy is 'collaborative synchronous and asynchronous' scholarly interaction between staff and students, coupled with effective student support.

2.17 The approach to learning and teaching set out in the strategy would enable the Expectation to be met.

2.18 The effectiveness of the approach to learning and teaching was evaluated through the review team's consideration of external examiner reports, the curriculum review action plan, annual course review reports, staff and student handbooks, and policy documents. The team also met students, senior staff and associate tutors.

2.19 KOL has seven permanent staff who have overall responsibility for design development and management of programmes. The Head of Subject role is key in providing leadership in the development and delivery of programmes in individual subject areas. Each Head of Subject is responsible for managing the team of associate tutors in that subject area. The job description for the Head of Subject role, when considered against the duties articulated to the review team during the visit, is not well matched. The actual duties are much broader in range than those contained in the job description. Additionally, when the CVs of post holders were considered against the job description, they did not always align to even the more limited description of the role set out in the job description. The team was not convinced that sufficient rigour had been exercised in ensuring that the job description of this pivotal role accurately reflected the responsibilities expected. Neither was it reassured that the appointment processes were aligning the experience of appointed staff to the published person specification. The review team **recommends** that KOL ensure that future recruitment processes for senior academic posts match the experience of appointees to the person specification and job description.

2.20 Staff have access to the University of Essex, Higher Education Academy accredited programme. Currently, one member of staff is enrolled on this programme and no staff have yet completed it. Permanent staff are also encouraged to network to enhance their continuing professional development. The challenges of operating peer review in an online environment, which the review team acknowledges, has led to the suspension of the tutor peer review process while a review took place. The Academic Board has recently considered a draft process and a new peer review programme is likely to start in summer 2018.

2.21 A recent curriculum review led by University has strengthened research-led learning in KOL's curriculum by ensuring a range of research-led modules are embedded throughout programmes. A focus has been the inclusion of research-led projects and a strengthening of research methods opportunities across all programmes.

2.22 Monthly admission to modules across the portfolio enables and ensures an adaptive cycle of review and response to the end-of-module surveys. Modules can be quickly updated before next delivery. This is done when there is evidence of the need to change, and associate tutors are notified of any changes before the next delivery point. Associate tutors are comfortable that change occurs only where there is good evidence of need. Additionally, KOL is very aware of the challenges facing part-time online students; a key element of the curriculum and teaching and learning is to structure delivery and assessment that encourages consistent engagement. The use of discussion forums that form part of the assessment for each module encourage students to engage in group learning and discussion online.

2.23 Associate tutor recruitment is an ongoing process led by the Head of Subject and Programme Support Manger. All staff are required to complete an online live teacher training module, which is backed up by the new tutor handbook. Once a new tutor has satisfactorily completed this module they are allocated to teach a module and assigned a mentor for the first delivery. Mentors feed back to the tutor and Head of Subject at the end of the delivery. Associate tutors are very positive about the induction module and their mentoring experience, and report that they are well prepared for online delivery. Permanent staff undergo an annual appraisal.

2.24 The learning platform delivers 24-hours a day access across a variety of devices. Review and development of the platform is in response to student feedback and data from the learner analytics system. Over the past three years a number of initiatives have been introduced to enhance the learner platform, including increasing access through mobile devices and annotating e-books that are used by students.

2.25 The Learning and Teaching Strategy and consequent approaches to learning result in the Expectation being met. However, the weakness identified in accurately defining the role, and in the subsequent appointment processes, for the Head of Subject position, which is pivotal in managing the learning opportunities and teaching practices, poses a moderate risk to the continuing effective management of this Expectation.

Expectation: Met
Level of risk: Moderate

Expectation (B4): Higher education providers have in place, monitor and evaluate arrangements and resources which enable students to develop their academic, personal and professional potential.

Quality Code, Chapter B4: Enabling Student Development and Achievement

Findings

2.26 KOL's strategy embraces the characteristics of its students and the nature of online part-time learning. Each student has a student adviser, who will stay with the student throughout their programme. The Student Support Team is currently available 8.30am to 7.00pm Monday to Thursday, and from 8.30am to 5.00pm on Fridays. The team works to a service level agreement that ensures that it responds to student queries within 24 hours on weekdays and within 48 hours on weekends. Student advisers are responsible for ensuring that students have a smooth transition from admissions, through the 21-day money back guarantee period, and throughout their first module. All students receive a welcome telephone call and email from their adviser inviting them to attend a welcome session. Welcome sessions are delivered through an online meeting room, providing an introduction to the learning platform and an opportunity for live interaction between students.

2.27 The strategy and operational arrangements for enabling student development and achievement would enable the Expectation to be met. The review team tested the effectiveness of the arrangements by viewing a demonstration of the learning platform, and by reading policies and procedures, handbooks and guidance. The team also held meetings with students, associate tutors, professional support staff and senior staff.

2.28 Students spoke very positively about the support received from the advisers. Support policies and procedures are designed to enable part-time online study. These include leave of absence and intervention policies, as well as late submission of coursework and extenuating circumstances. The Student Support Team responds to students queries within 24 hours. A review of support availability is underway to focus on international students in different time zones. Students confirmed that student advisers support students through admissions, induction and through their first module. A new starter session has recently been introduced to support students post induction. This is currently being reviewed.

2.29 Students access information regarding assessment tasks from the learning platform and are clear about what is expected of them. Feedback to students on assessed work is provided within seven days, and this forms part of contractual terms for staff. This approach is noted as good practice by external examiners and students are positive about the speed of feedback turnaround, which helped their learning. Students were generally positive about the quality of feedback but there were occasions when they did not receive clear feedback on how to improve for their next assignment (see Expectation B6).

2.30 Learner analytics are used to track student engagement with the learning platform and discussion groups. This enables students most at risk of dropping out to be identified and supported by staff at KOL. This facility has recently been enhanced and a new automated system sends emails to support students, freeing student advisers to focus on those students most at risk. A new student dashboard is being developed and is in the pilot phase. This will enable students to set clear goals and monitor their progress towards achieving them. The highly effective use made of the learner analytics system to identify and support students at risk is **good practice**.

2.31 A range of study skills resources are available online on the Student Tutor and Academic Resources (STAR) page. A review was undertaken in 2016-17 to ensure that only the most up to date and relevant resources are available to students. The Study Skills Manager offers support to students identified at risk. All students are required to study and pass the Fundamentals of Effective Learning as their first programme module. This module has moved from being the same across all programmes to one that is tailored to different discipline areas.

2.32 Student wellbeing support is available through student advice conversations. Leave of absence and intermission policies are in place to help. KOL's equality policy is under review. Students with disabilities are supported and enabled to study with KOL. Adaptations to the online platform are made to accommodate any such disability.

2.33 KOL has an effective approach to enabling students to develop their academic, personal and professional potential. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (B5): Higher education providers take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience.

Quality Code, Chapter B5: Student Engagement

Findings

2.34 KOL takes a range of deliberate steps to engage students in the quality assurance and enhancement of their educational experience. This includes the use of end-of-module surveys, course surveys and the effective use of the VLE as a mechanism through which students regularly feedback about their learning experience. KOL's strategic approach to student engagement is articulated in its Student Engagement Policy, which is reviewed annually by the Academic Board. These student engagement processes would allow the Expectation to be met.

2.35 The review team tested the operation of these processes by examining a range of documentary evidence, including KOL's Student Engagement Policy, course committee minutes and summaries of end-of-module surveys collated by the Quality and Enhancement Team. The review team also met students from across the provision, senior staff and teaching staff.

2.36 The review team confirmed the effective operation of these student engagement processes. Students have high satisfaction in relation to their ability to give feedback on their educational experience, and student advisers operate as effective first points of contact for students to feedback outside formal quality assurance processes.

2.37 Student's complete end-of-module surveys and a course survey modelled on the National Student Survey, which are collated by the Quality and Enhancement Team and submitted for review by the Student Satisfaction Group. Course committees meet every six months and review the results of module surveys and course questionnaires for each subject area.

2.38 KOL acknowledges difficulties in engaging all students in the assurance and enhancement of their educational experience when the totality of its provision is delivered online. The review team noted that, at present, students are not directly represented at quality assurance committees such as course committees and the Academic Board. Students can suggest agenda items for discussion at these committees through the VLE.

2.39 The VLE contains a student voice forum, in which students regularly feedback about their educational experience in addition to departmental forums where they offer feedback specific to their programme of study.

2.40 Minutes for quality assurance committees such as course committees are readily accessible to students through the quality assurance webpages on the VLE.

2.41 The Student Satisfaction Group meets monthly and includes the Director of Quality and Student Services, the Academic Director, Heads of Subject, the Head of Student Services and the Head of Learning Technology, and considers student feedback across all programmes to identify relevant trends. Minutes or notes of the Group are not kept but actions are noted on the feedback tracker and are monitored by the Quality Administrator to ensure actions are completed. Heads of Subject follow up and monitor any required actions in their areas and communicate any actions taken to students through the VLE or email. The Head of Student Support provides general feedback and updates to the student body.

2.42 KOL takes deliberate steps to engage students in the quality assurance and enhancement of their educational experience. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met

Level of risk: Low

Expectation (B6): Higher education providers operate equitable, valid and reliable processes of assessment, including for the recognition of prior learning, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought.

Quality Code, Chapter B6: Assessment of Students and the Recognition of Prior Learning

Findings

2.43 Academic standards are set by the University of Essex, and KOL has aligned its policies and procedures to these requirements. These are then approved and periodically reviewed by the University. Any changes made by the University are advised to KOL so that KOL's undergraduate and postgraduate rules of assessment are aligned. KOL has recently updated its Marking Policy to take account of a wider range of assessment practice introduced to take account of new programme areas. Individual assessment strategies and any new approaches to assessment are considered as part of validation or periodic review. External examiners are consulted as part of this process.

2.44 The design of the approach for assessment would enable the Expectation to be met. To test the approach, the review team considered documentation relating to the processes for managing, assuring and reporting the outcomes of assessment, and met staff and students.

2.45 Policies and procedures are in place to ensure assessments are designed and conducted to meet the needs of students studying in different locations and for those with protected characteristics who may need reasonable adjustments. These are available in student handbooks and on the learning platform.

2.46 Policies and procedures are in place for accredited prior learning (APL) and are published on the learning platform website and in student handbooks following approval by the University. Applications for APL are managed by KOL's Quality and Enhancement Team, in line with the APL approval framework, and students are supported in the process by their admissions adviser. The policy on academic offences is also published on the website and learning platform. Academic offences are reported to the University annually. The review team was provided with documented examples of APL decisions and in considering these discovered an example of an error in the award of APL. In discussions with senior staff the team was informed that there was currently no checking or audit of APL decisions. The review team **recommends** that KOL introduce a process for checking and auditing accredited prior learning decisions to ensure they are accurately made.

2.47 Assessment setting, first marking and moderation are the responsibility of KOL. KOL's assessment procedures are set out in the KOL/University Online Learning and Teaching Strategy, Marking Policy and Academic Offences Policy. Assessment is designed for online learning, with a key element being the encouragement of consistent engagement throughout the module. This is achieved through a variety of assessment, with regular touch points. These include discussion forums, written essays, reports, case studies and reflection. Feedback on assessment is a strength of KOL's pedagogical approach, and this is recognised by external examiners as good practice. Module tutors mark each individual component upon completion and provide a provisional mark and feedback within seven days of submission. This enables students to access the feedback on the learning platform and utilise it to enhance the assignments that occur later in the same module. General and programme-specific assessment, progression and awards regulations are in place and are reviewed regularly through the annual review of courses procedure. External examiners

review final assessment artefacts, marking and moderation There is no document summarising the process for the creation and approval of assessment artefacts, and no policy on the re-use of assessments, although plagiarism-detection software is used to check all assessments (see Expectation A2.1).

2.48 Support systems are in place for staff to provide timely feedback to support student learning. Information on collusion, plagiarism and academic offences is available in the student handbook, website and learning platform. The relevant board of examiners receives a report on any cases of misconduct. KOL students who are required to resubmit are enrolled in a specially designed resubmission module, which provides information and support in relation to study skills; one-to-one support is also available from the Study Skills Manager. Marking and moderation is carried out in alignment with the Marking Policy. Marking criteria are published and available to students within each module on the learning platform. Grading criteria are written in relation to specific assessment modes, for example the Moot in the Criminal Law module. Second marking is conducted contemporaneously as the module is delivered, thus allowing immediate feedback and sharing of best practice to inform their real-time delivery.

2.49 Following assessment submission, a two-stage moderation process takes place to consider marks. Pre-boards and boards of examiners meet quarterly to approve module marks, and to consider extenuating circumstances, special considerations and alleged cases of academic malpractice prior to consideration of student progression and award of qualifications. This schedule was specifically designed to ensure that students who study online, module by module, are not disadvantaged by having to wait for extended periods before being allowed to resubmit failed work or progress from level to level. Boards are chaired by the Dean or Deputy Dean of Partnerships at the University and include representation from the Partnership Management Team. Minutes are produced to record decisions, especially for those students who may have an anomalous mark. Students are notified of the outcome from each board of examiners by the Quality and Enhancement Team, typically within 10 working days of the board taking place. KOL has a policy on ethical approval of research proposals. As the curriculum has diversified, KOL has recognised a need for further training and development for those staff who are reviewing proposals. A research ethics working party is currently undertaking a project to identify and develop appropriate training and development opportunities.

2.50 KOL operates equitable, valid and reliable processes of assessment that enable students to achieve their intended outcomes. The review team concludes that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (B7): Higher education providers make scrupulous use of external examiners.

Quality Code, Chapter B7: External Examining

Findings

2.51 KOL appoints external examiners for each course in line with University of Essex requirements. The policy and procedure for managing external examining is provided on the University website.

2.52 The policy and procedures provided by the University would allow the Expectation to be met. The review team assessed the effectiveness of these by reading policy documents, minutes of boards of examiners, external examiner reports and responses from KOL. The team met senior staff, Heads of Subjects and students.

2.53 Nominations criteria are set out by University. External examiners are sourced through an advert on the JISC website to ensure a good match with University requirements. Once the appointment is approved by University Partnership Office, the KOL Quality and Enhancement Team provides a welcome pack containing relevant information to each examiner. An online training session is offered to enable examiners to use the learning platform and access student work. External examiners submit reports annually to the University. These are shared with the relevant head of department at KOL, who provides a response to the examiner. Tracking of receipt of reports and responses is undertaken.

2.54 Organisation-wide themes that fall into good practice or areas for improvement are developed into a report for the Academic Board, and the reports are used to inform the annual review and monitoring process. External examiner reports are shared with students via the online platform and in course committee meetings, although students who met the review team had not seen an external examiner report and did not know how to access one. Additionally, external examiners are consulted on changes to modules and new programme developments.

2.55 Evidence seen by the review team demonstrates that processes for appointment and induction are followed. Additionally, there is evidence that comments from external examiners are considered and acted upon; for example, recent comments from one external examiner regarding the drift away from learning outcomes in assignment setting and the swift action taken by KOL to rectify this.

2.56 KOL makes scrupulous use of external examiners. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

2.57 As outlined under Expectation A3.3, the processes and procedures for monitoring and review of programmes follow those of the University of Essex and are set out in the KOL Annual Review of Courses Flowchart. Programmes are subject to annual monitoring processes and University periodic review on a five-yearly basis, the outcomes of which are reported to the Academic Board and the University Partnership Education Committee. There are no separate KOL procedures and guidance for annual monitoring and periodic review. The absence of documented internal procedures and guidance contributes to the recommendation under Expectation A2.1.

2.58 The procedures would allow the Expectation to be met. The review team tested the approach through meetings with staff and students, and by considering a range of programme monitoring and review documentation.

2.59 KOL operates an annual cycle of review for all programmes, which follows the process of the University. Each Head of Subject completes an annual review of courses using pro-forma provided by the University. The University also provides benchmarking data for consideration, for example in relation to published statistics on degree classification. The aim of the annual review of courses is to identify programme enhancements through a reflective process, which incorporates information from students, external examiners and other stakeholders. Actions are incorporated into the annual review of courses action plan, the progress of which is monitored by the Academic Board in accordance with its terms of reference for overseeing quality, standards and enhancement.

2.60 Following feedback from the University, the authors of the annual review of courses have been encouraged to incorporate more benchmarking data and to write smarter action plans with more realistic timeframes. An example of the development of this approach is evidenced in the annual review of courses reports for undergraduate Criminology. The Academic Director uses the subject-area annual review of courses to inform the institutional annual monitoring report. The University provides feedback on annual review of courses and annual monitoring reports, and facilitates discussion of the process at the Partnership Education Committee. Following discussion at the Partnership Education Committee in March 2017, it was recognised that there is some overlap and duplication within the reports: as a result, the process for production of annual review of courses and annual monitoring reports is being reviewed.

2.61 KOL biannual course committees are the formal mechanism that allows associate tutors to contribute to feedback and debate around enhancement and quality assurance. Historically, course committee meetings had included all subject areas, however in 2016 the academic team took the decision to split the meeting into subject areas to allow more detailed discussions on topics that were more relevant to the specific specialism. Minutes of course committee meetings indicate that they are well attended by associate tutors. Associate tutors had been required to complete a feedback form at the end of each module, but over time it was recognised that responses had become formulaic. As a result, during 2016-17 a project was undertaken to review the way in which feedback is gathered from tutors.

2.62 All programmes are subject to the University's periodic review process every five years. Annual monitoring informs periodic review, together with feedback from employers, the academic community and external examiners. Events follow a similar process to validation events, whereby programme documents are reviewed and discussed with the programme team by an external panel of specialists drawn from academia and professional practice.

2.63 The Quality and Enhancement Team maintains a record of all course validation dates, validation periods and due dates for periodic review, which allows for forward planning of events and document preparation. Institutional review is conducted by the University every five years, with the next review due in 2017-18. Changes and enhancements to validated programmes can be made in-year through the University's course variation procedure, which is used by KOL. The Quality and Enhancement Team also keep a central record of all course variations. The external examiner reports are an important element of the review and monitoring cycle.

2.64 KOL operates effective, regular processes for the monitoring and review of programmes. The absence of documented internal procedures and guidance beyond the use of flowcharts presents a risk to KOL's continued ability to meet this Expectation. The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

Expectation (B9): Higher education providers have procedures for handling academic appeals and student complaints about the quality of learning opportunities; these procedures are fair, accessible and timely, and enable enhancement.

Quality Code, Chapter B9: Academic Appeals and Student Complaints

Findings

2.65 KOL operates fair and accessible procedures for the handling of complaints and academic appeals, which are clearly articulated within its Complaints Policy and its Academic Appeals Policy and Procedures. These policies are aligned with the University of Essex's procedures and accessible to students through the VLE and programme handbooks.

2.66 The effective operation of these complaints and academic appeals processes would allow the Expectation to be met.

2.67 The review team tested the effective operation of these processes by examining documentary evidence, including the Complaints Policy, Academic Appeals Policy and Procedures and programme handbooks. The review team also met senior staff responsible for the management of complaints and academic appeals, professional support staff and a range of students.

2.68 The review team confirmed the effective operation of these complaints and academic appeals procedures. To submit an academic appeal, a student completes a form of appeal and receives an acknowledgment in five working days. The appeal is subsequently forwarded to the Academic Director for consideration, before being forwarded to the University Academic Registrar for consideration by an Appeals Officer. The Appeals Officer investigates and writes to the student within six weeks, stating when they can expect a decision.

2.69 To appeal the decision of the Appeals Officer, a student submits a 'right to review' form to the University Pro-Vice-Chancellor Education for consideration. If they or their nominee finds grounds for the appeal they can refer the appeal to the board of examiners for a final decision.

2.70 The provider actively encourages the informal resolution of any complaints received. Student advisers operate as an effective first point of contact for students considering making a complaint, and seek to facilitate an informal resolution before signposting students to the formal complaints process. Heads of Subject track any informal complaints received.

2.71 To enter the formal complaints process, a student submits a formal complaint form to the Director for Quality and Student Services, who acknowledges receipt of the complaint within five days and refers it to their nominee. Within 10 working days, the Director informs the student of the status of the complaint and a decision is communicated to the student within 90 days. If the student remains dissatisfied after the conclusion of this process, they can appeal to the Managing Director, who makes a final decision and issues a completion of procedures letter.

2.72 The Academic Appeals Policy and Procedure and Complaints Policy clearly inform students of their right to appeal to the Office of the Independent Adjudicator.

2.73 The Quality and Enhancement Team tracks the status of complaints and academic appeals and record the outcome and record any procedural or policy changes made as a

consequence of a complaint or academic appeal.

2.74 KOL recognises the need for a more formalised process for the oversight of complaints and academic appeals, and from the academic year 2017-18 intends to compile a summary report for consideration by the Academic Board.

2.75 KOL operates fair, accessible and timely processes for the handling of complaints and academic appeals, and these processes are transparently communicated to students. The review team concludes the Expectation is met and the associated level of risk is low.

Expectation: Met

Level of risk: Low

Expectation (B10): Degree-awarding bodies take ultimate responsibility for academic standards and the quality of learning opportunities, irrespective of where these are delivered or who provides them. Arrangements for delivering learning opportunities with organisations other than the degree-awarding body are implemented securely and managed effectively.

Quality Code, *Chapter B10: Managing Higher Education Provision with Others*

Findings

2.76 KOL does not deliver learning opportunities with organisations other than its degree-awarding body. KOL has a policy on work-based learning relating to the foundation degree work-based learning modules. The policy sets out guidelines and procedures to ensure that students can complete the work-based elements of these programmes. KOL has decided to withdraw its foundation degree programmes and at the time of the review these programmes were on 'teach-out', with only a very small number of students remaining. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

Expectation (B11): Research degrees are awarded in a research environment that provides secure academic standards for doing research and learning about research approaches, methods, procedures and protocols. This environment offers students quality of opportunities and the support they need to achieve successful academic, personal and professional outcomes from their research degrees.

Quality Code, *Chapter B11: Research Degrees*

Findings

2.77 KOL does not offer research degree programmes, therefore this Expectation does not apply.

Expectation: Not applicable

Level of risk: Not applicable

The quality of student learning opportunities: Summary of findings

2.78 In reaching its judgements about the quality of student learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

2.79 Of the 10 Expectations under consideration in this judgement area, all are met. Seven are met with low associated risk and three are met with moderate risk. There are two examples of good practice highlighted and three recommendations made.

2.80 The first area of good practice relates to Expectation B2 and highlights the 21-day trial period for students that enables them to assess the degree to which online learning meets their needs. The second area of good practice relates to Expectation B4 and draws attention to the highly effective use made of the learning analytics system to identify and support students at risk.

2.81 Expectation B2 has a recommendation to ensure that the Admissions Policy accurately reflects practice. This is a situation where the practice is satisfactory but is not aligned with the Policy. As such, this Expectation carried an assessment of low risk. The recommendation under Expectation B3 relates to the assessment made by the review team that the significant and pivotal role of Head of Subject in managing teaching and learning is not accurately described in the job description. Further, selection processes are not robustly aligning the skills and experience of appointees with the job description and person specification; together, this constitutes a moderate risk to the continuing effective management of learning and teaching. The third recommendation, under Expectation B6, relates to a need to introduce a process for checking and auditing accredited prior learning submissions to ensure they are accurately made. The three recommendations and the three Expectations with moderate risk attached were assessed as being capable of prompt and straightforward action, and as such the associated risk could be quickly mitigated. The team took this fact, and the examples of good practice, into account when making its overall judgement that all ten Expectations in this area are met.

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

3 Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1 KOL's website is the main vehicle for externally facing information. The website was updated in 2016 and is 'mobile optimised' to improve its accessibility. The cooperation agreement with the University of Essex provides for the joint development of marketing materials and arrangements for adherence to the University online brand guidelines utilised by KOL. KOL's website is managed by its marketing, academic, admissions and Quality and Enhancement teams. The VLE (Moodle) is the main channel of communication with enrolled students. The VLE is managed by the Learning Technology Team, which works with the academic, Student Support and Quality and Enhancement teams. The Quality and Enhancement Team manages the information for staff with responsibility for quality and standards. The University produces degree certificates, while KOL produces transcripts and a diploma supplement. KOL maintains contact with alumni through a quarterly newsletter.

3.2 The mechanisms for communicating with stakeholders would enable the Expectation to be met. The team assessed the effectiveness of these mechanisms through a check of the website, a demonstration of the learning platform, and reading student and staff facing handbooks and guidance. The team discussed the approach to producing and managing information with senior staff, Heads of Subject, associate tutors and students.

3.3 The website provides information for prospective students about the programmes offered by KOL under the University online brand. The information includes entry requirements; course structure; teaching, learning and assessment methods; module details; career opportunities; fees; and relevant policies. There is a downloadable prospectus and an accessible application form. The fees page includes details of a 21-day money back guarantee and the terms and conditions. The information on the website is supplemented by a live chat facility, available during office hours. Students who met the review team confirmed that the information was accessible and trustworthy.

3.4 The VLE is the primary source of information for students about their course, including programme specifications, module outlines, e-books and other resources, and assessment material. Students are introduced to online learning and the learning platform through completing an induction module and associated assignment. The Quality and Enhancement Team maintains an archive of definitive programme specifications, and module outlines. These are used to source the online learning materials. There is a clear process for the creation of module learning materials, which are signed off by Heads of Subject. KOL is working towards producing student handbooks for each subject area and level. Student handbooks are produced by Heads of Subject and stored centrally by the Quality and Enhancement Team. The review team was informed that currently there is no independent sign-off of handbooks and there is a need to develop a review schedule. Students confirmed that the information they receive from academic staff, advisers and support staff is accessible and trustworthy. Associate tutors who met the team confirmed that they had good access to programme and module information and policy documents, enabling them to carry out their responsibilities.

3.5 KOL acknowledges that it does not have an overarching policy or documented process to ensure the accuracy of the information it produces for its stakeholders. The lack of such documented arrangements to ensure that information is fit for purpose, accessible and trustworthy is a weakness that has the potential to allow, however inadvertently, inaccurate or misleading information to be presented to stakeholders. The review team **recommends** that KOL develop and implement documented procedures for the approval of information about learning opportunities.

3.6 KOL produces information for its stakeholders about the higher education it offers that is fit for purpose, accessible and trustworthy. However, the absence of a formal documented procedure for the approval of information represents a risk that inaccurate information could, inadvertently, be published. The review team concludes that the Expectation is met and the associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

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

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

3.8 There is one recommendation in this judgement area, which relates to the need to develop and implement documented procedures for the approval of information about learning opportunities. Although the review team found no instances of untrustworthy information being made available, it assessed the risk as moderate, because the absence of a formal documented procedure for the approval of information represents a risk that inaccurate information could, inadvertently, be published in the future. Overall, the team assessed the Expectation to be met.

3.9 The review team concludes that the quality of the information about learning opportunities at KOL **meets** UK expectations.

4 Judgement: The enhancement of student learning opportunities

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

Findings

4.1 KOL's strategic approach to enhancement is led by its Learning and Teaching Strategy, which encapsulates enhancement by supporting a high quality, supportive and well-resourced learning environment, utilising regular student module feedback and continuous curriculum enhancement, including engagement with the University of Essex curriculum review project and its associated action plan.

4.2 The approach to enhancement would allow the Expectation to be met. To test the approach, the review team considered documentation relating to the processes for managing and delivering enhancement, and met staff and students.

4.3 KOL's approach and engagement with the University allows for a more in-depth consideration of the current curriculum, and review themes have informed several programme level changes, including a review of research projects at master's level and reviewing research activities within undergraduate programmes. KOL benchmarks data with competitors and uses such comparisons as part of the annual course reviews procedures. Objectives are identified annually, and progress is monitored through the Academic Board.

4.4 KOL continuously enhances its VLE to generate management information, as well as to support learning through the use of automated emails, annotated e-books, student module feedback and student activity tracking, and expanded its Learning Technology Team in 2016-17. In 2015, KOL developed a learning analytics system using live data from the learning platform to identify at-risk students and send them customised emails, in addition to providing the Student Support Team with a dashboard of student activity. This is considered good practice under Expectation B3.

4.5 KOL is aware of the needs of students returning to study and those for which English is not their first language. KOL provides specific support for such students, including English language support and study skills. This is kept under review to ensure the experience is appropriate.

4.6 KOL shares good practice through annual review of courses, external examiner reports, tutor feedback and continuing professional development events, tutor bulletins and best practice guides. However, associate tutors do not appear to be supported in accessing continuing professional development. There is no KOL annual appraisal system or peer observation for associate tutors in place at present, due to concerns by such tutors that this would impact on their employment status.

4.7 KOL takes active and systematic steps to enhance the quality of students' learning opportunities. The review team concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

The enhancement of student learning opportunities: Summary of findings

4.8 In reaching its judgements about the enhancement of student learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

4.9 There are no recommendations or identified good practice in this judgement area. The review team found that KOL takes deliberate and systematic steps to enhance the quality of students' learning opportunities.

4.10 The review team concludes that the enhancement of student learning opportunities at KOL **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 [Higher Education Review \(Alternative Providers\) handbook](#).

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

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

Academic standards

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

Award

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

Awarding organisation

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

Blended learning

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

Credit(s)

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

Degree-awarding body

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

Distance learning

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

Dual award or double award

The granting of separate awards (and certificates) for the same **programme** by two **degree-awarding bodies** who have jointly delivered the programme of study leading to them. See also **multiple award**.

e-learning

See technology enhanced or enabled learning.

Enhancement

The process by which higher education providers systematically improve the quality of provision and the ways in which students' learning is supported. It is used as a technical term in our review processes.

Expectations

Statements in the **Quality Code** that set out what all UK higher education providers expect of themselves and each other, and what the general public can therefore expect of them.

Flexible and distributed learning

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

Framework

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

Framework for higher education qualifications

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

Reference points

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

Self-evaluation document

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

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

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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