Higher Education Review (Alternative Providers) of London College of Business Studies Ltd

July 2017

Contents

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 London College of Business Studies Ltd. The review took place from 25 to 26 July 2017 and was conducted by a team of two reviewers, as follows:

- Professor Christopher Clare
- Mr Howard White.

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.

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

Good practice

The QAA review team identified no features of **good practice**.

Recommendations

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

By January 2018:

- ensure that the planned review of quality assurance documents establishes a single definitive articulation of every procedure (Expectation A2.1)
- develop bespoke Terms of Reference for all committees concerned with oversight of quality and standards (Expectation A2.1)
- ensure that the priority attached to student representation on the Quality and Standards and Academic Committees is reflected in their formal membership (Expectation B5)
- implement the recommendation from the 2016 HER (AP) review to ensure consistency, clarity and accuracy of all information relating to assessment regulations (Expectations B6, C)
- revise the Academic Assessment and Internal Verification Policy to include a statement of the role and procedures of assessment boards and to ensure that the document is contextualised to the purposes of the College (Expectation B6)
- ensure that academic appeals procedures for students and the appeals procedures for applicants are available on the College website (Expectations B9, B2, C)
- ensure that information for all stakeholders about the College and its programmes is fit for purpose and accessible (Expectation C)
- further develop and embed the Higher Education Enhancement Strategy 2017-2020 (Enhancement).

Within six months of College operations recommencing, implement the following recommendations from the 2016 HER (AP) review:

- review and monitor rigorously the effectiveness and consistency of policies and procedures (Expectation A3.2)
- adhere consistently and rigorously to the College's Recruitment and Admissions Policy to ensure that the principles of fair admission for all students are applied (Expectation B2)
- ensure that assessment regulations are applied rigorously and equitably (Expectation B6).

Affirmation of action being taken

The QAA review team **affirms** the following actions already being taken to make academic standards secure and/or improve the educational provision offered to students:

- the action taken, in response to the recommendation from the 2016 HER (AP), to produce a programme approval process (Expectation B1)
- the action being taken to revise the approach to monitoring student progression at module and course level in order to ensure full consideration of retention and achievement (Expectation B4)
- the steps being taken to introduce work-based learning as an enhancement objective (Enhancement).

About the provider

London College of Business Studies Ltd (the College) is an independent College founded in 2005 as AA Hamilton College, with the primary aim to widen access to further and higher education in the UK. The College's mission is 'to contribute to the worldwide community through the pursuit of high-quality yet affordable education and learning, striving to achieve the highest level of excellence and performance for our students'. The College previously recruited international students but no longer has a Tier 4 licence, and aims to concentrate recruitment on home and EU students funded through the Department for Business, Innovation and Skills and the Student Loans Company.

At the time of the HER (AP) visit in July 2017, the College was operating under its former name of AA Hamilton College. The College changed its name to London College of Business Studies Ltd on 10 October 2017.

In June 2017, the College relocated premises from central London to Leyton. At the time of the review visit there had been no students at the College for over 18 months and the College was not recruiting, pending the outcome of the HER (AP). There was a small team of management staff consisting of the Principal, Operations Manager, Head of Academics and the recently appointed Director of Standards and Enhancement. During the review visit the team met the Chair of Trustees, the Principal and the three management staff.

A QAA Concerns Investigation in 2015 made a number of recommendations, and the College produced an action plan in response. The College's most recent previous QAA review was a HER (AP) that took place in February 2016. The review concluded that the maintenance of academic standards of awards offered on behalf of awarding organisations met UK expectations; and that the quality of student learning opportunities, quality of information about learning opportunities, and the enhancement of student learning opportunities required improvement. The 2016 HER (AP) review team made 17 recommendations.

At the time of the visit, the College had addressed the majority of the recommendations from the 2016 HER (AP). However, the nature of some of the recommendations is such that it will not be possible to demonstrate that they have been addressed until the College is operational and recruiting, teaching and assessing students. The review team also identified that a recommendation concerning consistency, clarity and accuracy of information relating to assessment regulations had not yet been fully addressed. Four of the recommendations from 2016 have therefore been carried forward as recommendations from this review.

The College informed the review team that it currently has approval from three awarding organisations to deliver programmes - Awards for Training and Higher Education (ATHE), Oxford, Cambridge and RSA Examinations (OCR), and Pearson - but that when delivery recommences, for the foreseeable future (the following three years), the College intends to deliver only the Pearson Higher National in Business programme.

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   The College currently has approval from three awarding organisations to deliver programmes. These are ATHE, OCR and Pearson. However, the College indicated to the review team that the only programme planned for delivery in the immediate future is a Pearson Higher National in Business. Initially, the programme will be delivered by two of the existing senior staff, with additional teaching staff being recruited gradually as student numbers increase.

1.2   The setting of standards is primarily the responsibility of the awarding organisation, which determines that the requirements of the relevant credit framework, Subject Benchmark Statements and any professional, regulatory and statutory bodies are met. The respective responsibilities of the College and the awarding organisation are set out in the responsibilities checklist, which was appended to the self-evaluation document (SED).

1.3   As has been the case with programmes delivered in the past, the proposed HND programme is wholly designed by the awarding organisation and there are no plans for

College-designed modules. The College has a strategic vision to work with other higher education awarding partners, but no details of the nature of these plans were provided to the team.

1.4   The College delivers programmes designed and approved by Pearson and is not directly responsible for the setting of academic standards. Its policies and procedures, outlined in its Quality Assurance Policy and Academic Assessment and Internal Verification Policy, would enable the Expectation to be met.

1.5   To test the operation of these mechanisms, the review team scrutinised relevant documents, including the Pearson Academic Management Review reports, external verifier reports for 2014-15 and the Quality Assurance Policy. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

1.6   The two staff who would initially be teaching the Higher National programme demonstrated understanding of, and compliance with, the academic framework of Pearson. Staff confirmed that they are aware of the processes and procedures set out in the Quality Assurance Policy and the Academic Assessment and Internal Verification Policy. Staff displayed awareness of the Quality Code, the FHEQ and Subject Benchmark Statements. They use the appropriate programme specifications, and have processes in place that will ensure adherence to the Pearson external verification procedures.

1.7   The College's adherence to the requirements and procedures of the awarding organisation ensures that programmes are aligned with the appropriate external and sector reference points. The review team concludes that the Expectation is met and that 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

1.8   The primary responsibility for academic standards rests with the awarding organisation. The College's Quality Assurance Policy sets out details of the approach to quality assurance and sets out principles underpinning the approach.

1.9   The College has an organisational chart that is complex given that there are only four members of staff. Due to the small number of current permanent members of staff, there is considerable overlap in roles.

1.10   The College provided a committee structure chart which included membership, but not Terms of Reference, for all the committees referred to in the SED. The team was also provided with sets of minutes for the Board of Trustees; the Quality and Standards Committee; the Standardisation meeting; the Resources Committee; and the Student Representative Committee.

1.11   The academic framework and regulations governing the award of qualifications delivered at the College are specified by the awarding organisation. To complement this, the College uses its Quality Assurance Policy, which covers various aspects of standards and quality.

1.12   The framework and regulations, as set out in the Quality Assurance Policy and described in the documentation on the governance structure, would allow the Expectation to be met.

1.13   To test the operation of these arrangements, the review team scrutinised relevant documents, including the evidence on committees and organisational structures. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

1.14   The Quality Assurance Policy is comprehensive. It sets out the terms of reference for the Quality and Standards Committee. These are full and cover most of the areas set out in the Quality Code. The committee structure chart sets out the membership of the committees, none of which list student representatives as members.

1.15   The Quality Assurance Policy contains detailed Terms of Reference for the Board. However, there are only generic Terms of Reference for the other committees, which cover the conduct of committees but not their detailed responsibilities. The review team considers that the absence of detailed Terms of Reference could impede the effective operation of the governance structure. Consequently, the team **recommends** that the College develops bespoke Terms of Reference for all committees concerned with oversight of quality and standards.

1.16   Previous reviews suggest that the quality of documentation concerning quality assurance has been a problem at the College. The team noted that there were still some inconsistencies in structures and nomenclature and that there were some discrepancies in information about assessment. College staff stated that part of the role of the recently appointed Director of Standards and Enhancement will be to devise a new set of quality

assurance documents in order to remove any inconsistencies. The team noted this and **recommends** that the College ensures that the planned review of quality assurance documents establishes a single definitive articulation of every procedure.

1.17   College staff confirmed that the Quality and Standards Committee is the body with the responsibility for the monitoring and maintenance of academic standards at the College. Staff also confirmed that, at present, there are only four members of permanent staff and that those staff will be covering various roles when operations resume.

1.18   The review team considers that the frameworks and regulations in place are proportionate and effective for a College of this size. Therefore, the team considers that the Expectation is met. However, as the two recommendations concern weaknesses in the documentation relating to governance (as it relates to quality assurance), the 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

1.19   The awarding organisation is responsible for maintaining the definitive record of each programme and qualification. The College uses programme aims, intended learning outcomes and the programme specifications that are provided by the awarding organisation in selecting, delivering and assessing programme content. The College intends to use the Pearson programme specification and standard module specifications for the Higher National in Business.

1.20   The programme information will be provided to students on the website and on the virtual learning environment (VLE); more detailed summaries will be provided in a Student Handbook.

1.21   The monitoring of the standards of the programmes is also undertaken by the awarding organisation. Pearson has standard procedures for maintaining oversight of the College's management of the Higher National programme, including the maintenance of detailed module and programme specifications.

1.22   These arrangements would enable the Expectation to be met. To test the operation of these arrangements the review team scrutinised relevant documents, including the Quality Assurance Policy and the Academic Assessment and Internal Verification Policy, programme and module specifications and handbooks. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

1.23   Members of staff met by the team were fully aware of the respective responsibilities of the College and the awarding organisation in terms of monitoring, reviewing and maintaining records of programmes and qualifications. They were able to articulate a clear line between programme learning outcomes and those found in modules, and their associated assessments.

1.24   There is a process for annual course review to look at the delivery and assessment of the programme, which includes some scrutiny of statistics relating to progression and award. The annual course review therefore allows consideration of the further development of the programme, informed by input from tutors and from students, via various forms of feedback.

1.25   Overall, current members of staff understand the importance of the definitive record of a programme, and how it is expressed in the learning outcomes and assessment at module level. The review team concludes that the Expectation is met and that 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

1.26   Programme design and approval is the responsibility of the awarding organisation. The College does not currently design either programmes or modules for validation but has recently created a Policy for Programme Approval in case it should decide to do so in future.

1.27   This arrangement would enable the Expectation to be met. To test the operation of these arrangements the team scrutinised relevant policy documents. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

1.28   The team found that the College's Quality Assurance Policy contains an accurate statement of its responsibilities in programme approval and that these are understood by senior staff. The Policy for Programme Approval identifies an appropriate set of information in respect of standards that must be included in a proposal. However, the policy has not been tested as the College has not been operational since it was produced.

1.29   The team noted that no concerns about academic standards had been raised in the awarding organisation's most recent Pearson Academic Management Review and external verifier reports.

1.30   The team concludes that the Expectation is met. Although the Policy for Programme Approval has not been tested in practice, the risk is low because primary responsibility for standards will always rest with an awarding partner.

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

1.31   The awarding organisation is responsible for establishing the learning outcomes for programme and modules and for the award of credit and qualifications to students who have met them. The College is responsible for setting and marking assignments but both are verified by an external examiner, appointed by the awarding organisation, who checks that appropriate learning outcomes are established and tested rigorously.

1.32   To ensure that it meets the requirements of its awarding organisation, the College sets out a strategy for internal verification in its Quality Assurance Policy. Principles and procedures for assessment are established in an Academic Assessment and Internal Verification Policy, and summarised in the Staff Handbook. Each module has a scheme of work which is mapped to the learning outcomes established by the awarding organisation. An annual schedule is established to ensure that draft assignments and marked work are checked by an experienced member of staff, and the checks are recorded. At the end of each semester, standardisation meetings are held to ensure consistency in marking. Assessment Boards are then held to make formal recommendations on marks, referrals, unfair practice and awards. Separate policy documents govern Reasonable Adjustment and Special Consideration, Academic Misconduct (Plagiarism), and Malpractice. Rules governing late submissions, extensions and appeals are set out in the Academic Assessment and Internal Verification Policy and the student Programme Handbook.

1.33   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents, including awarding organisation reports and the minutes of College committees, and spoke to the Chair of Trustees, the Principal and the senior staff.

1.34   The team found that the College's policies, handbooks and checklists indicate that it understands its responsibilities. The most recent Pearson Academic Management Review report records that the required quality assurance procedures for assessment are in place and effective, although record keeping and document tracking required improvement and the Malpractice Policy needed to provide for declaration of conflicts of interest. External verifier reports for 2014-15 do not record any concerns relating to academic standards. The team was shown a sample module scheme of work that was correctly matched to the learning outcomes in the module specification.

1.35   The review team noted that the 2016 HER (AP) report had acknowledged improvements in policies and procedures to address weaknesses identified in the QAA Concerns Report of April 2015. The team noted that since 2016 the College has conducted a systematic review of its policies, taking the opportunity to improve the version control of quality assurance documents as recommended by its awarding organisation. Each policy now carries details of its origin and last and next review, and an internal tracking document collates these records for the Principal.

1.36   As the College has not delivered programmes since 2014-15, it was unable to demonstrate to the team the effective implementation of its revised policies. The College acknowledges that there are still some deficiencies in their consistency, which are the subject of further recommendations in sections A2.1 and B6 of this report. The team was told that the newly appointed Director of Standards and Quality would conduct a further review. The team therefore **recommends** that the College, when delivery recommences, implements the recommendation from the 2016 HER (AP) to review and monitor rigorously the effectiveness and consistency of policies and procedures.

1.37   The team concludes that, as the College understands its responsibilities and satisfies the requirements of its awarding organisation in respect of standards, the Expectation is met. However, the risk is moderate, because the College cannot yet demonstrate that it has overcome shortcomings in the rigour with which quality assurance procedures are applied.

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

1.38   Pearson is responsible for ensuring through monitoring and review that the academic standards established for its Higher National awards are maintained by the College. It conducts verification of assessment and an annual review of academic management at the College, which receives reports on the outcomes and is expected to address any recommendations.

1.39   The College monitors its own performance continuously through standardisation meetings and oversight of data and processes by the Quality and Standards Committee, which also ensures that concerns or recommendations from the awarding organisation are addressed. At the end of each year, an Annual Course and College Review (ACCR) meeting is held to review academic performance data, and this generates an action plan.

1.40   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents, including awarding organisation reports and the minutes of College committees, and spoke to the Chair of Trustees, the Principal and the senior staff.

1.41   The College has not delivered programmes since 2014-15, but the team established that Pearson had conducted annual monitoring up to that point and had not raised any concerns about standards. The team noted the finding in the 2016 HER (AP) report, that the College had responded effectively to recommendations made by Pearson in respect of procedures. There are internal and external procedures in place for programme monitoring and review. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

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

Findings

1.42   As the awarding organisation, Pearson is responsible for engaging external and independent experts in programme design and review. It is also responsible for ensuring verification of the academic standards achieved by students through a process of external examination. The College's Quality Assurance Policy draws the attention of staff to these procedures and to the importance of external reference points including the Quality Code. Explicit reference to the Quality Code is made in the College's policies on admissions, assessment, programme approval and complaints.

1.43   Although the College does not currently design either programmes or modules for validation it has created a Policy for Programme Approval, which requires that a programme development group must include external representation and that a programme proposal must include information on the views of employers and other stakeholders. Periodic review will be conducted using the same procedure.

1.44   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents, including policies and external examiners' reports, and spoke to the Chair of Trustees, the Principal and the senior staff.

1.45   The College did not deliver programmes in 2015-16 or 2016-17, but the team noted the finding in the 2016 HER (AP) report that effective use had been made of independent external expertise in assessment up to that point. Senior staff are familiar with the Quality Code and Subject Benchmark Statements. The College benefits from the external professional experience of its staff and this is a priority when teachers are appointed. The Principal told the team that he also finds the experience of members of the College's Board of Trustees to be particularly valuable. The College has recently begun to develop links with business representatives, which will improve its capacity to benchmark its performance. In the longer term it hopes to establish formal links with universities, including articulation agreements, which would have a similar impact.

1.46   The team concludes that the College is aware of the importance of externality in setting and maintaining standards and that it makes effective use of the external examiners appointed by its awarding partner. 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

1.47   In reaching its judgement in this area, the review team considered its findings against the criteria specified in Annex 2 of the published handbook.

1.48   The College's awarding organisation has primary responsibility for maintenance of academic standards, and the College's main responsibilities in respect of academic standards are to adhere to the policies and processes of the awarding organisation. The review team concludes that the College has internal policies and systems in place to ensure that it will be able meet the requirements of the awarding organisation, and therefore to meet its responsibilities for maintaining academic standards.

1.49   All seven of the Expectations for this judgement area are met and the associated level of risk is low in five, with moderate risk in two. There are no identified features of good practice and no affirmations.

1.50   There are three recommendations in this judgement area, relating to the need to ensure that there is a single definitive articulation of every procedure (Expectation A2.1); to ensure that there are bespoke Terms of Reference for all committees responsible for quality and standards (Expectation A2.1); and, carried forward from the 2016 HER (AP), the need to review and monitor rigorously the effectiveness and consistency of policies and procedures (Expectation A3.3).

1.51   The recommendations in this judgement area arise either from weakness in the documentation about governance (as it relates to quality assurance); or that, given its circumstances at the time of the review, the College was not yet able to demonstrate that it has overcome shortcomings in the rigour with which quality assurance procedures are applied.

1.52   The review team concludes that the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations at the College **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   The College hopes to expand its curriculum offer in the medium term and, although it has not previously designed either programmes or modules for validation, has created a Policy for Programme Approval. This involves strategic and financial approval by the senior management team and academic approval by the Senior Deliberative Committee, prior to ultimate approval by the Board of Trustees. A proposal must include information on standards, programme structure and delivery, learning resources, quality assurance arrangements, benchmarking data, and market research, together with the views of teachers, students and other stakeholders, including employers. It is to be developed by a group that will include staff, student and external representation.

2.2   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents and spoke to the Chair of Trustees, the Principal and the senior staff.

2.3   The Policy for Programme Approval was created in response to a recommendation in the 2016 HER (AP) report. Although it does not explicitly require consideration of equality and diversity matters (an issue referred to by the 2016 review team), or precisely identify the role of the Board of Trustees, the team found it to be broadly satisfactory in design. It separates business and academic considerations, identifies an appropriate set of information that must be considered, and requires the engagement of external expertise. The team **affirms** the action taken, in response to the recommendation from the 2016 HER (AP), to produce a programme approval process. The team noted that the College's Quality Assurance Policy had not been updated to take account of the new Policy for Programme Approval and that it identifies the Quality and Standards Committee by the obsolete title of Academic Board. A recommendation is made in section A2.1 of this report, that the College must ensure that its processes are definitively articulated.

2.4   The team asked about resource planning and established that the Trustees and Principal have a clear understanding, from previous experience, of what would be needed for the resumption of delivery, although they would take the precaution of checking with the awarding organisation in case its policies and procedures had changed. Senior staff are conscious of the limited capacity of the College's current premises. They told the team that if the College were to engage in further expansion it would consider purchasing one of the resourcing models used in similar colleges.

2.5   Senior staff were able to tell the team how they go about establishing local labour market needs. The team noted that steps taken to introduce work-based learning into the curriculum had enhanced the College's capacity for employer engagement.

2.6   The team established that optional modules from the awarding organisation's lists are selected by the senior academic staff in the light of local labour market demand, although student preferences are taken into consideration. The offering of option modules is

approved by the Principal, unless there are resource implications that require the approval of the Board of Trustees.

2.7   The 2015-2018 Strategic Plan sets out an aspiration to explore new partnerships with awarding partners, including universities and possibly institutions outside the UK. However, the team was informed that the College does not intend to pursue this until it has firmly re-established delivery of its Pearson Higher National provision.

2.8   The team concludes that the College has made significant progress in creating processes for programme approval, and the Expectation is now met. However, as the new policy is untested and there are minor problems of clarity in the documentation, the 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

2.9   The procedures for recruitment and admissions are set out in the Recruitment and Admissions Policy. The policy and procedure are both current and are mapped to the Quality Code.

2.10   Applications are made by students directly to the College, based on information on the website, and the process is clear and accessible to use. Entry criteria are clear and include a requirement for proficiency in English, and these criteria are viewed as vital for student admissions. There is a procedure for recognition of prior learning, and this is detailed within the Recruitment and Admissions Policy.

2.11   There is an Equality and Diversity Policy that applies to admissions and recruitment. The College has a Disability Policy and there is commentary on reasonable adjustments to cater for disability within the Recruitment and Admissions Policy. The College also provided a prospective student assessment form, a prospective student interview form, and some outline statistics on past applications received and offers made.

2.12   The policies and processes set out in the Recruitment and Admissions Policy and associated documentation would enable the Expectation to be met.

2.13   To test the operation of these arrangements the review team examined documentation including the Student Recruitment and Admissions Policy, the Complaints and Appeals Procedure for Applicants, and the student interview template and assessment form. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

2.14   Applications can be made directly to the College using a form on the College website. The application process is transparent and accessible, with clear entry criteria and a requirement for proficiency in English. All applicants are interviewed and given a diagnostic test, which ensures that applicant needs are identified. The website contains details of programmes offered, with information on the awarding organisation together with its entry requirements, a summary of the admission process, and an electronic application form.

2.15   The 2016 HER (AP) report identified failures to implement the Recruitment and Admissions Policy in recruitment to one of the College programmes. The College explained that the students in question were well known to the staff, having recently completed another College programme. The College therefore felt that it knew the students' abilities and qualifications and that some of the procedures designed for the recruitment of new students could be dispensed with. This led to a recommendation that the College adheres consistently and rigorously to its Recruitment and Admissions Policy to ensure that the principles of fair admission for all students are applied.

2.16   There is an induction checklist for new (and returning) students. This specifies a variety of College and programme-specific information. The College's policy for the recognition of prior learning is detailed in the Recruitment and Admissions Policy. The review team noted that although the admissions policy includes a procedure for

applicants to appeal against admissions decisions, this is currently not on the website. The recommendation in Expectation B9 includes reference to publication of the admissions appeal process on the website.

2.17   The review team found that the recruitment and admissions processes were understood by the staff, all of whom are fully aware of the policy and have considerable experience in recruitment of students for HNC/D Business programmes. They confirmed that new staff would be trained in the processes and would be monitored by senior staff in its application but, in the absence of any recruitment having taken place, this could not be tested. Therefore, the team **recommends** that, when delivery recommences, the College implements the recommendation from the 2016 HER (AP) to adhere consistently and rigorously to the College's Recruitment and Admissions Policy to ensure that the principles of fair admission for all students are applied.

2.18   The College's arrangements are clear and comprehensive in their coverage of aspects of student recruitment, selection and admission. The Expectation is met. The associated level of risk is moderate because the College was not in a position to demonstrate that it has addressed the recommendation from the 2016 HER (AP) concerning consistent and rigorous implementation of its admissions policy.

Expectation: Met
Level of risk: Moderate

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

2.19   There is a Learning and Teaching Policy, which has statements on quality assurance, aims and objectives of a Learning and Teaching Strategy, statements on contributions to effective learning, and various other statements of guidance for staff and students, including commitments on physical and human resources and fostering independent learning.

2.20   The SED states that the College recognises the importance of well-qualified staff and that it has a Continuing Professional Development Policy. The policy refers to an annual staff review and development scheme. A staff appraisal form was submitted as part of the evidence. There is a separate policy and procedure document on the selection, recruitment and induction of staff and this goes into some detail on the recruitment process.

2.21   A number of roles are shown on the organisation chart, the majority currently unfilled, and role descriptions were provided. Some staff CVs were also made available and these demonstrate the fit between the roles and the personnel.

2.22   The SED states that the quality of teaching is monitored through teaching observations. The Quality Assurance Policy outlines the observation scheme, and examples of peer observation and lesson observation forms were provided as part of the evidence base.

2.23   The approach outlined in these processes and policies would enable the effective teaching and learning to allow students to develop. This, in turn, would enable the Expectation to be met.

2.24   The review team tested the operation of these arrangements by examining documentation, which included the Quality Assurance Policy, observation records, policy and procedure document on the selection, recruitment and induction of staff and the Continuing Professional Development Policy. The review team also spoke to the Chair of Trustees, the Principal and the senior staff.

2.25   Staff reported their experience of a welcoming and open, supportive approach. Members of staff were clearly able to learn from each other, in part supported by their accumulated experience of teaching in a variety of other providers. New members of staff will be expected to have, or be working towards, a teaching qualification.

2.26   The Learning and Teaching Policy establishes principles for effective learning and teaching in higher education. This includes fostering partnership between staff and students and the development of students as individual learners; the policy provides effective guidance to staff.

2.27   The appraisal process uses feedback from students and teaching observation to inform discussions, and the College presented evidence in the form of an observation report and feedback. The College uses the appraisal process to help identify staff development

needs. Individual staff CPD is the main outcome of the appraisal system. However, the College acknowledged that it is also a vehicle for the identification of any College-wide training requirements and that in-house events have taken place. The team regarded the approach to appraisal and staff development as effective.

2.28   The current members of staff have considerable experience of delivering programmes at the intended level, in a number of institutions. With the limited planned cohort, teaching can be covered by existing staff, while additional associate staff will be recruited from a register of associate lecturers held by the College.

2.29   The 2016 HER (AP) review team was not satisfied that the College had a clear approach to helping students develop as individual learners, particularly in the move from level 5 to level 6. Their report includes recommendations that the College should develop a strategic approach to staff development to enable the effective planning and delivery of higher education and ensure that planning for learning is appropriate for level 6. However, since the College has recruited new staff since then and does not intend running level 6 for the foreseeable future, the team did not pursue this area.

2.30   The College currently has limited provision of IT learning resources and systems, but these would be adequate for the planned cohort. There is a Moodle-based VLE that will be fully populated once recruitment commences. There is a small College library, and increasing availability of e-books.

2.31   The team considers that arrangements are in place to ensure that students are consistently well supported to develop as independent learners, enhancing their analytical, critical and creative skills. The review team concludes that the Expectation is met, and that the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B4: Enabling Student Development and Achievement*

Findings

2.32   The SED provided commentary on the monitoring of student achievement at module level and provision of required support. Monitoring transition and progression is partly the responsibility of the awarding organisation, but it is also undertaken by the College.

2.33   The SED claimed that the Academic Committee has a role in monitoring learning opportunities, but it does not refer directly to the monitoring of student progression and achievement. There is some reference to student representation and students' role in quality assurance, and there were references to a Student Representative Committee, with minutes provided.

2.34   There is an Equality and Diversity Policy and a Disability Policy. There is commentary on reasonable adjustments to cater for disability within the Recruitment and Admissions Policy. There is a Welfare Strategy and Policy that links in with students' individual learning plans.

2.35   The SED refers to student support, including pastoral support. There is also reference to academic support provided on a one-to-one basis. Pastoral support is also provided by a Student Welfare Officer (a post which was vacant at the time of the review visit), and a job description was provided to the review team. The Welfare Officer is a member of the senior management team and sits on both the Academic Committee and the Administrative Committee. The job description indicates that the post is also responsible for the library, College documentation and general administrative support.

2.36   The Student Handbook outlines the support available to students, including careers advice and support for disabilities. The SED does not refer directly to skills development or personal development for students, although this does feature in the Learning and Teaching Policy. The Student Handbook does not directly contain any advice on employability.

2.37   There is reference within the Learning and Teaching Policy to developing students' higher education learning. The Student Handbook refers to encouraging students to become independent learners and to take responsibility for their own learning during their studies as part of lifelong learning.

2.38   The mechanisms in place to monitor development and provide the resources to enable students to succeed would enable the Expectation to be met.

2.39   The review team tested the effectiveness of these arrangements by considering documentation, including guidance provided to students, and various policy documents including the Learning and Teaching Policy and the Welfare Strategy and Policy. The team also spoke to the Chair of Trustees, the Principal and the senior staff.

2.40   College staff outlined a variety of mechanisms for student support. Due to the small size of the College, students were able to approach their tutors or the member of staff responsible for student welfare.

2.41   The team was impressed by the responses from the members of staff whom it met. These responses illustrated a supportive organisation that exploits the tight-knit nature of the

College team. When operations resume, the tutorial responsibility will be shared between three current members of staff, one of whom has experience in dealing with dyslexia and other student support requirements. Another of the current members of staff has experience in providing careers advice. All three are experienced in providing both pastoral and academic support.

2.42   Students at the College are provided with a number of opportunities to feed back to staff on resources and support to help them develop. This includes feedback questionnaires for each module. Student feedback data indicates overall satisfaction with resources. Members of staff are able to identify any additional resources required and requests can be presented by tutors directly to the Trustees.

2.43   The Academic Committee monitors learning opportunities but the minutes do not illustrate the monitoring of student achievement. This is undertaken by the awarding organisation but the team was informed of developments at the College to make greater use of management information in monitoring student progression and achievement. To that end, the College is in the process of adopting a new student management system, which is currently being implemented. The team welcomed this development and **affirms** the action being taken to revise the approach to monitoring student progression at module and course level in order to ensure full consideration of retention and achievement.

2.44   There is currently a small library for the use of students. A Moodle-based VLE is being developed which contains a variety of information relating to individual module sessions, assessment tasks and more general College policies and procedures.

2.45   The College has in place effective student support and development arrangements to develop students' 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

2.46	In its Learning and Teaching Policy the College identifies partnership between staff and students, and the engagement of students in monitoring and influencing the curriculum, as essential to effective learning. In its Strategic Plan it commits to ensuring effective student representation, eventually creating a Students' Union when numbers permit, and acting on student feedback. The College's Quality Assurance Policy identifies mechanisms for learner participation in the form of regular feedback surveys and the role of elected representatives. These commitments are drawn together in a new Higher Education Strategy for Student Engagement 2017-2020.

2.47	A Student Representative Committee meets regularly with College managers. There is some provision for student representation on academic committees. The College sets out expectations of students, including that they will engage in opportunities to provide feedback to enhance quality, and draws attention to these in its Programme Handbooks. It considers that informal channels of communication, facilitated by the Student Services Manager, are also effective in responding to individual concerns in a small college.

2.48	These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents and spoke to the Chair of Trustees, the Principal and the senior staff.

2.49	The 2016 HER (AP) team established that the Student Representative Committee had been operational, that training material had been provided and that its minutes had been disseminated to students. They also found that students considered the representative system and the College's response to feedback to be effective. In their report the 2016 HER (AP) team affirmed the steps taken to introduce a Students' Union. Nonetheless, they recommended that the College should develop systems to engage students as partners in their learning, which would ensure recognition and guidance for representatives, and regular evaluation of the effectiveness of student engagement. The new Strategy for Student Engagement was drawn up in response. The current review team found it to demonstrate a clear understanding of principles set out in the Quality Code, and were satisfied that senior staff understand the importance of student engagement.

2.50	However, the team noted a lack of clarity about structures of student representation in the College's quality assurance documents, which in part reflects its generic approach to defining the terms of reference of committees. A recommendation to address this is made in section A2.1 of this report. The 2014-15 student Programme Handbook makes no reference to student representation on deliberative committees. The terms of reference of the Quality and Standards Committee, which are bespoke, provide for the possibility of student attendance once a term. The team noted evidence of student attendance at Academic Committee. Senior staff told the team that students could attend any committee but were able to identify the Quality and Standards Committee and Academic Committee as the most important. The team **recommends** that the College ensures that the priority attached to student representation on these committees is reflected in their formal membership.

2.51	Since the 2016 HER (AP), the College has developed a Policy for Programme Approval and Periodic Review, which requires student participation. Senior staff told the team that students were invited to participate in ACCR, which was not clear from the

documentation, and that student engagement would be evaluated as part of this process. The possibility of prizes to reward student representatives was under consideration. No progress can be made on plans for a Students' Union until numbers permit, but while the student body remains small, all learners will be invited to attend regular Staff/Student Forums.

2.52   The team noted that paper-based student feedback surveys had been conducted at the module and College level, using a standard questionnaire inviting quantitative and qualitative responses, which had attracted a respectable rate of return. The Chair of the Board informed the team that the Trustees review student feedback data as a matter of routine. Senior staff told the team that they intended in future to conduct online surveys at the mid-point and end of each module and that they had acquired the rights to management information software, which would further improve communication between staff and students. There is also an intention to revise the feedback questionnaire to permit it to be benchmarked against the National Student Survey.

2.53   The team agreed with the conclusion reached in the 2016 HER (AP) report that the Expectation is met. The review team noted that the College has taken steps to address the recommendations in the 2016 HER (AP) report. However, in the absence of current students it cannot demonstrate effective implementation, so the risk remains moderate.

Expectation: Met
Level of risk: Moderate

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

2.54   The College's Academic Assessment and Internal Verification Policy establishes principles of fairness, validity, reliability, utility and transparency in assessment. It sets out processes for planning assessment; setting assignments; submission, marking and return of work; storage and security; internal and external verification; and appeals. Separate policies govern Reasonable Adjustment and Special Consideration, Malpractice, and Academic Misconduct (Plagiarism). Procedures for recognition of prior learning are set out in the Recruitment and Admissions Policy. A summary of all these procedures is provided in the Staff Handbook. The student Programme Handbook outlines the procedures, sets out a detailed schedule of assignments, and includes guidance to help students understand the types and purposes of assessment. The Learning and Teaching Policy includes a statement of principles for effective learning through assessment and the Quality Assurance Policy includes a statement of principles for internal verification.

2.55   Assessment strategies for Higher National programmes are dictated by the awarding organisation, but College staff can design assignment briefs. These are issued with a cover sheet including the assessment criteria. Marks are formally determined at Assessment Boards. Students are provided with feedback within two weeks of submission.

2.56   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised the policy documents and handbooks and spoke to the Chair of Trustees, the Principal and the senior staff.

2.57   Taken together, the team found that the College's quality assurance documents describe an approach to assessment that is satisfactory. Academic Management Review reports by the awarding organisation find processes for the management of assessment to be in place and effective. The most recent external examiner reports recommend improvement in formulation of overall unit marks and in feedback to students, but describe the quality of assignment briefs and assessment decisions as good and commend the College for its timely handling of a large volume of assessment.

2.58   However, the team identified a tendency for individual documents to give incomplete or overlapping accounts of processes. For example, internal verification is described in different wording in at least four different documents. The section in the student Programme Handbook on claiming mitigating circumstances is more detailed than that given in the Academic Assessment and Internal Verification Policy. The team discovered that the College had not addressed conflicting information and inaccurate terminology in the Academic Misconduct (Plagiarism) and Malpractice Policies identified in the 2016 HER (AP), despite a recommendation to do so. Neither policy clearly identifies the role of the awarding organisation. A recommendation from the awarding organisation to include the issue of staff conflict of interest in the Malpractice Policy has also not been acted on. The team **recommends** that the College implements the recommendation from the 2016 HER (AP) to ensure consistency, clarity and accuracy of all information relating to assessment regulations.

2.59   The team noted that although the principles and procedures set out in the Academic Assessment and Internal Verification Policy are fit for purpose, the document is identical to that in use at another London college and in places uses terminology more appropriate to level 3 provision. It does not mention Assessment Boards, although they are referred to in the Staff Handbook, and senior staff were able to give a clear account of their role and procedures. The team **recommends** that the College revises the Academic Assessment and Internal Verification Policy to include a statement of the role and procedures of assessment boards and to ensure the document is contextualised to the purposes of the College.

2.60   The team saw satisfactory examples of assignment briefs, evidence of internal verification on standard templates, and records of standardisation meetings. The 2016 HER (AP) review team found the quality of feedback on assignments to be variable, although students said they found it helpful. To address this weakness the College has produced a template that requires feedback to be entered against each learning outcome and level descriptor.

2.61   The 2016 HER (AP) review team identified discrepancies in the accounts given by students and different groups of staff of the handling of formative assessment and plagiarism, and recommended that the College take action to address this. As teaching has not taken place since 2014-15, the College has not been able to demonstrate that it has overcome the problem. The team therefore **recommends** that the College, when delivery recommences, implements the recommendation from the 2016 HER (AP) review to ensure that assessment regulations are applied rigorously and equitably.

2.62   Noting the failure to act upon the recommendations from the 2016 HER (AP) regarding consistency, clarity and accuracy of information, the team concludes that this Expectation is not met. The procedures are broadly adequate but in the absence of current students the College is unable to demonstrate that they are rigorously applied, so the level of risk is moderate.

Expectation: Not met
Level of risk: Moderate

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

Quality Code, *Chapter B7: External Examining*

Findings

2.63   External examiners appointed by the awarding organisation inspect assignment briefs and assessed work in order to verify standards. They prepare formal reports that are shared with the College and which include judgements on how well it has responded to the previous report. The awarding organisation is responsible for their nomination, training, direction and recognition. It also checks that the College has effective systems and procedures to govern assessment processes, making recommendations for improvement where appropriate. The College's Quality Assurance Policy and Academic Assessment and Internal Verification Policy establish internal procedures for verification and for responding to external examiners' reports.

2.64   These arrangements would enable the Expectation to be met. To test their operation the team scrutinised relevant documents, including external examiners' reports and the minutes of College committees, and spoke to the Chair of Trustees, the Principal and the senior staff.

2.65   The team noted that verification is explained to students in their Programme Handbook, that external examiners' reports are shared with students at the Academic Committee, and that the awarding organisation is satisfied with action taken on its recommendations. The 2016 HER (AP) of the College established that external examiners' reports are discussed at programme team meetings and inform annual monitoring, that internal verification operates as described in the College's policies, that the Academic Committee oversees these processes, and that the College responds with an action plan and monitors progress made.

2.66   Although the College has not delivered programmes since 2014-15, the team was satisfied that there are appropriate arrangements in place for making scrupulous use of external examiners. The Expectation is met and the 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

2.67   The College's awarding organisation, Pearson, conducts annual monitoring of the quality of learning opportunities through external verification of assessment and review of the College's management of programme delivery. It submits reports on its findings, which may include recommendations for action, to the College. To ensure that it meets the requirements of the awarding organisation and to enhance its provision, the College has developed its own internal process of ACCR, set out in its Quality Assurance Manual. Programme leaders present a reflective report to an
end-of-year meeting, which generates a College-wide report and action plan. These are signed off by the Principal and presented to the Board of Trustees. Programme reports draw on student performance data, external examiner reports, and student feedback.

2.68   Periodic review of programme aims and content is the responsibility of the awarding organisation, but the College has recently developed a process of internal periodic review on a four-year cycle to ensure that its offer remains strategically appropriate and current in terms of market fit, as well as providing an opportunity for enhancement. This process is set out in the Policy for Programme Approval and uses the same procedure. This involves consideration of strategic and business aspects by the senior management team and academic aspects by the Senior Deliberative Committee, on the basis of a formal proposal to continue or discontinue. The proposal must draw on student performance data benchmarked against similar organisations and external reference points, as well as annual monitoring reports, market information, and feedback from staff, students, employers and other stakeholders. If a programme is to be withdrawn, the report must identify alternatives and possibilities after closure.

2.69   These arrangements would enable the Expectation to be met. To test their operation, the team scrutinised relevant documents and spoke to the Chair of Trustees, the Principal and the senior staff.

2.70   The 2016 HER (AP) review team explored the operation of the Annual College and Course Review process and found it to be suitable, but recommended that the College further develops and embeds it. The College has since acquired the rights to use a software package that will generate information on student achievement and feedback for annual monitoring. Senior staff told the team that it was also intended to use the ACCR process to evaluate the effectiveness of the committees and student engagement at the College. However, as there has been no teaching since 2014-15, there has been no opportunity to put these initiatives into practice. The team noted that existing documents describe the ACCR process in slightly different ways and do not incorporate the latest initiatives. A recommendation is made in section A2.1 of this report, that the College must ensure that its processes are definitively articulated.

2.71   The new process for internal periodic review was created in response to a recommendation in the 2016 HER (AP) report, and is untested. The team found it to be broadly appropriate. Senior staff were able to identify periodic review as an important opportunity for enhancement, although this is not given much emphasis in the Policy for Programme Approval.

2.72   The team asked whether student representatives would participate in annual and periodic review, as this is not clear from the documentation. Senior staff told the team that they would be invited to attend the ACCR meeting and also the moderation of the report and action plan by the Principal. Student representation on the senior academic committees that consider monitoring reports has been identified as a priority. A recommendation is made in Expectation B5, that this should be reflected in the formal membership of these committees.

2.73   The team agreed with the conclusion reached in the 2016 HER (AP) report, that the Expectation is met. The College has taken action to address the recommendations in the 2016 HER (AP) report, and therefore the associated risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B9: Academic Appeals and Student Complaints*

Findings

2.74   Information about a complaints/appeals procedure is included in the Student Handbook; this references further information in the VLE. The Quality Assurance Policy refers to the complaints procedure but gives no further detail. The Complaints Policy states that information about it is widely available through the college website; the Moodle VLE for Students; the Student Handbook; the Staff Handbook; the college library; and through Student Representatives meetings. It also states that students and staff are informed about the Complaints Policy at staff induction; at the start of the academic year; during student induction to their course; and at student representative meetings.

2.75   The policy describes a standard multi-stage process, including an initial informal stage, a formal written second stage and a final stage where the complaint is heard by a panel. The Student Welfare Officer is responsible for supporting students and keeping formal records, reporting to the senior management team at the end of each semester and the Academic Committee at the end of the year. If a complaint cannot be resolved, the student is advised that they may contact the Office of the Independent Adjudicator.

2.76   The Academic Assessment and Internal Verification Policy articulates a procedure for academic appeals. This defines the grounds on which an appeal can be made and the right of a student who remains dissatisfied to follow the appeals procedure of the awarding organisation. There is a two-stage internal process with initial consideration by the Programme Leader and Internal Verifier and then, if unresolved, by the Principal. The document states clearly that a student cannot make an appeal on the basis of academic judgement.

2.77   There are no details in the Student Handbook or the Quality Assurance Policy on the procedures for academic appeals, although there are references to it being available on the VLE.

2.78   These mechanisms for students to make a complaint or an appeal would enable the Expectation to be met.

2.79   The review team tested the effectiveness of these arrangements through scrutiny of documentation including the Student Handbook, Staff Handbook and the Quality Assurance Policy, Complaints Policy and the Appeals Policy. The team also spoke to the Chair of Trustees, the Principal and the senior staff.

2.80   College staff confirmed the Complaints and Appeals Policies and procedures. The intention was to ensure that the latest versions of both policies were made available through a variety of sources, including the College website. Staff confirmed that the Complaints Policy was also available through the VLE and in student handbooks.

2.81   The Appeals Policy was detailed within the Academic Assessment and Internal Verification Policy and on the VLE, with pointers to it from the Student Handbook. In addition, full details and documentation for student appeals were available via the student noticeboard at the College. Staff confirmed that the Complaints and Appeals Policies covered appeals against admissions decisions.

2.82　　The team noted that details of the appeals procedure and policy were not currently on the website. There were no references in parts of the website used by students and the section on admissions did not set out how a student could appeal an admissions decision. The team accepted that the website was still under development pending resumption of operations. However, the team **recommends** that the College ensures that academic appeals procedures for students and the appeals procedures for applicants are available on the College website.

2.83　　The College's procedures for student complaints and appeals are robust. However, the accessibility of the policies and procedures is not straightforward and has led to the above recommendation. Consequently, the review team concludes that the Expectation is met but that the level of risk is moderate.

Expectation:　Met
Level of risk:　Moderate

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

2.84   The College made no comment in the SED on whether it delegates any of its responsibility to a third party. It was not clear from the SED whether the College intends to arrange student placements. However, this Expectation is potentially applicable if and when the College works with employers, for example student placement or work experience, or if employers are engaged in any way with assessment. In response to requests from the review team, further clarification and evidence was subsequently provided, including a Work-Based Learning Strategy and documentation relating to an agreement with an employer.

2.85   The team considered that these arrangements would allow the Expectation to be met. The review team tested the operation of the arrangements by considering the evidence on the Work-Based Learning Strategy, and the agreement with an employer. The team also spoke to the Chair of Trustees, the Principal and the senior staff.

2.86   In meetings with staff, the team learned that there were plans for placement learning in the HNC/D Business programme to be introduced, although these plans were still very much embryonic. When the programme starts, the College intends to involve local employers through guest lectures and visits for students. As the programme develops, the College would introduce placement learning as part of the HNC/D Business.

2.87   The Higher Education Work-Based Learning Strategy sets out the intention to provide high quality placements. It describes the necessary oversight and monitoring arrangements and specifies the procedures for placement approval and risk assessment.

2.88   The members of staff met by the team were knowledgeable and experienced in setting up and managing placement learning. They had a number of local contacts with employers and these should be developed further when the College resumes full operation.

2.89   The team considers that the College's arrangements for delivering learning opportunities with other organisations are sound. The review team concludes that the Expectation is met and that 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

2.90   The College does not offer research degrees; therefore, this Expectation is not applicable.

Expectation: Not applicable
Level of risk: Not applicable

The quality of student learning opportunities: Summary of findings

2.91   In reaching its judgement in this area, the review team considered its findings against the criteria specified in Annex 2 of the published handbook.

2.92   Of the 10 relevant Expectations for this judgement area, nine are met and one is not met. The associated levels of risk are low in five Expectations, with moderate risk in five.

2.93   There are no identified features of good practice. There are two affirmations concerning the production of a programme approval process (Expectation B1) and action being taken in relation to monitoring student progression at module and course level (Expectation B4).

2.94   There are six recommendations in this judgement area, concerning: ensuring that the student involvement in relevant committees is reflected in their membership (Expectation B5); ensuring consistency, clarity and accuracy of all information relating to assessment regulations (Expectations B6, C); ensuring that appeals procedures for students and applicants are on the website (Expectations B9, B2, C); appropriate contextualisation of the Academic Assessment and Internal Verification Policy and the inclusion of the role and procedure of assessment boards (Expectation B6); consistent and rigorous application of the Recruitment Policy (Expectation B2) and the rigorous and equitable application of assessment regulations (Expectation B6).

2.95   The recommendations in this judgement area arise from problems of clarity and accuracy of documentation or accessibility of information to students; or from the fact that, in the absence of current students, the College was unable to demonstrate that processes and procedures are effectively implemented and rigorously applied.

2.96   Three of the recommendations have been carried forward from the 2016 HER (AP). The recommendation concerning consistency, clarity and accuracy of information relating to assessment regulations has not yet been addressed. The other two are carried forward because the College has not been operational since the 2016 review, and given the nature of the recommendations was not in a position to address them.

2.97   The review team concludes that the quality of student learning opportunities at the College **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 The College emphasises the importance of its website as the first contact for the majority of stakeholders. The website provides information to prospective students about the programmes on offer, the entry criteria and other details from the awarding organisation. Prospective students are provided with information on the admissions procedures. Fee information is provided for each programme, including any additional costs that may be payable by the student, such as examination entry fees and awarding organisation registration. At induction, students are given a general Student Handbook that provides a guide to College rules and regulations.

3.2 The College assures the accuracy and completeness of public information by the process, put in place through its Public Information Policy, that defines responsibilities for managing information. The overall responsibility for the College website rests with the Director of Administration, a post which is currently vacant.

3.3 The College Prospectus and relevant brochures for public distribution are produced under the editorial control of the Director of Administration. This post-holder has responsibility to ensure that contents of published materials are accurate and clear, and comply with all legal requirements.

3.4 The accuracy of corporate and administrative content is verified, at least twice yearly, by the Principal, with assistance from College senior managers. All advertising materials are prepared by the Marketing Officer and reviewed by the Marketing Manager before publication, with academic materials verified by the Head of Academics.

3.5 The College produces various materials for internal circulation, in particular the Staff and Student Handbooks, with the Head of Administration having overall responsibility. The accuracy of academic content is verified at least twice yearly, by the Head of Academics, quality and curriculum advisers and programme leaders.

3.6 The College has a VLE that contains the Student Handbook, additional programme and module information, and copies of College policies and procedures relevant to students. The College has initiated measures to set up and maintain a Student Portal for the provision of information to support students and an Academic Staff Portal for the provision of information to support staff. Both the Student Portal and the Staff Portal are maintained by the academic staff, with ultimate responsibility resting with the Head of Administration.

3.7 The Public Information Policy sets out the general process for the provision of information to the public, including to students. It also describes the mechanisms in place to assure that information to the public is fit for purpose, accessible and trustworthy. This would enable the Expectation to be met.

3.8 The team tested this Expectation through scrutiny of documentation, including the College's Quality Assurance Policy, Public Information Policy, the document control system, document house rules and the College website. The team also spoke to the Chair of

Trustees, the Principal and the senior staff.

3.9   In meetings with staff, the process for the management of public information was clarified. As there are only four members of staff currently at the College, the tasks attributed in the policy (for example to marketing manager, quality and curriculum advisers, programme leaders) are shared among the current staff. The author of a document (or website content) is responsible for cross-checking its accuracy with a colleague with the appropriate expertise. The final copy goes to the Principal for approval and then to the Operations Manager, with assistance from an IT consultant, for implementation. Information is also 'road tested', for example by the Operations Manager acting as though he were a student. Although the VLE is still being developed, the team was able to see that it will be a comprehensive and detailed support tool for students' learning. The team viewed these arrangements as a sound way to manage the College information sources.

3.10   The College has recently implemented a document control system for tracking and version control. There are also regulations that set out house style to ensure consistency of presentation.

3.11   The team was told that the College is to make greater use of management information in monitoring student progression and achievement. In order to achieve this, the College is in the process of adopting a new student management system, which is currently being implemented.

3.12   The 2016 HER (AP) report implies that information for applicants and completing students was satisfactory and noted that students were happy with the information provided to them. However, it records discrepancies in induction information, undated promotional materials, and confusion among staff over information responsibilities. It recommends that the College develops procedures for checking that information is fit for purpose, accurate and trustworthy. The College has taken steps to address the recommendation and the team acknowledges that improvements in the management of information have been made.

3.13   The College acknowledges that its website is currently under development. This is reasonable if it is not actively recruiting and has no students. Notwithstanding this, the information currently displayed for the public and for prospective students is both minimal and lacks precision. The information on programmes is out of date. Although the awarding organisation partner is identified, there are currently no links to the programme specifications. Moreover, there are some current deficiencies in the information provided for students, such as details of the appeals procedures (see Expectation B9), and in documentation relating to assessment (see Expectation B6).

3.14   In addition to the above, there is little information on the website of direct use to the general public or for employers. In meetings with the team, staff acknowledged this to be the case. As a consequence of the above, the team **recommends** that the College ensures that information for all stakeholders about the College and its programmes is fit for purpose and accessible.

3.15   Overall, the majority of the information provided by the College is generally fit for purpose, accurate and trustworthy. Information provision is monitored and updated regularly. Although the team acknowledges that the website is, for good reason, still under development, there remain some deficiencies, leading to the recommendation in this area. Consequently, the team concludes that the Expectation is met, but that the associated level of risk is moderate.

Expectation: Met
Level of risk: Moderate

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

3.16   In reaching its judgement in this area, the review team considered its findings against the criteria specified in Annex 2 of the published handbook.

3.17   The single Expectation in this judgement area is met, and the associated level of risk is moderate. There are no features of good practice or affirmations.

3.18   The 2016 HER (AP) report identified some deficiencies in procedures for checking information and recommended that the College should develop procedures for checking that information is fit for purpose, accurate and trustworthy. The review team found that the College has taken steps to address this recommendation and that there have been improvements in the management of information.

3.19   The team accepts that, given the College's current situation, the website is not fully developed and that it will be further augmented once the College begins operating again. The team found that the website was seen primarily as a recruitment tool, and felt that the College needs to consider the broader concept of information to ensure that the information provided meets the needs not only of students and applicants, but also of other relevant stakeholders, including employers and members of the public.

3.20   There is one recommendation, that the College should ensure that information for all stakeholders about the College and its programmes is fit for purpose and accessible. There are also related recommendations concerning assessment information (see Expectation B6) and ensuring the availability on the website of procedures for academic appeals and appeals from applicants (see Expectation B9).

3.21   The level of risk is moderate because (although the majority of information is generally fit for purpose, accurate and trustworthy) the recommendation is indicative of some deficiencies remaining in the College's information.

3.22   The review team concludes that the quality of the information about learning opportunities at the College **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   The College has a Strategic Plan for 2015-2018, a Higher Education Enhancement Strategy for 2017-2020, a Learning and Teaching Strategy, which is embedded in its Learning and Teaching Policy, a Student Engagement Strategy, and a Continuing Professional Development Policy for staff. A Director of Standards and Enhancement provides strategic leadership under the Principal. Enhancement objectives are embedded in quality assurance processes, including managerial and peer review of teaching and annual monitoring of programmes. The College is able to access student views through student representatives and regular surveys. It engages external expertise from its awarding organisation and plans to do so in its new programme approval process. It plans to develop benchmarking data to assist in the setting of targets and the evaluation of its performance. It also plans to use external experts to support the development of a higher education ethos.

4.2   These arrangements would enable the Expectation to be met. The team tested the Expectation through scrutiny of documentation. The team held meetings by teleconference with the Chair of Trustees and the Principal. The team also had two meetings with College staff, one focusing on academic issues and the other on student support.

4.3   The 2016 HER (AP) report recommended the College to develop and disseminate a deliberate, strategic and organisationally led approach to the enhancement of student learning opportunities that is embedded at all levels. In response, it created the new role of Director of Standards and Enhancement and the current holder has begun to review the quality management processes. The College's Strategic Plan 2015-2018 has largely been overtaken by events, with the College unable to deliver programmes since 2014-15. However, the Plan does identify quality enhancement as a core objective. Since it was written, the College has identified enhancement priorities, which are to upgrade its facilities, including its VLE, improve its capacity to generate programme management information, and introduce work-based learning into the curriculum. Senior staff have identified key performance indicators, which they will use to benchmark performance against similar providers. The College has also articulated a Higher Education Enhancement Strategy for the first time.

4.4   The team was satisfied that the current leaders of the College had a clear understanding of enhancement as defined in the Quality Code. The Chair of the Board of Trustees told the team that he did not envisage further changes to the senior leadership, most of whom were appointed since the College last delivered teaching. From speaking to the senior staff and examining their CVs, the team had confidence in their capacity to provide effective leadership.

4.5   The team found that the College's strategy documents contained appropriate statements of principle and aspiration but were relatively lacking in detail. Senior staff described them as a work in progress. The team **recommends** that the College further develops and embeds the Higher Education Enhancement Strategy 2017-2020.

4.6   The team was able to identify deliberate steps taken to act on the enhancement priorities. A simpler interface for the VLE has been created, which the team was able to inspect. Rights to a new software package for management information have been acquired. A Higher Education Work-Based Learning Strategy 2017-2020 has been created and

agreement has already been reached with one employer about providing opportunities. The team **affirms** the steps being taken to introduce work-based learning as an enhancement objective.

4.7   The College has acted on many of the recommendations to enhance its quality management procedures, which have been made by both its awarding organisation and QAA. In the last three years it has created or refined procedures for programme approval and periodic review, peer observation of teaching, student engagement, internal verification, and information management. It has revised its Staff Development Policy and Learning and Teaching Policy. It has engaged external consultants to provide guidance on developing quality management processes and to train relevant staff.

4.8   The College was able to demonstrate in the 2016 HER (AP) that routine quality assurance processes work, including action on external examiners' reports and on student feedback.

4.9   The team concludes that the current leaders of the College have succeeded in creating appropriate mechanisms for enhancement. The Expectation is met. However, as the College is not currently teaching it cannot yet demonstrate that the mechanisms operate effectively, resulting in a moderate level of risk.

Expectation: Met
Level of risk: Moderate

The enhancement of student learning opportunities: Summary of findings

4.10   In reaching its judgement about the enhancement of learning opportunities, the review team considered its findings against the criteria specified in Annex 2 of the published handbook.

4.11   The review team found that following the 2016 HER (AP), the College has put in place mechanisms that will enable it to take deliberate steps to enhance student learning opportunities. Quality enhancement is identified as a core objective in the Strategic Plan, an Enhancement Strategy has been produced, a new post of Director of Standards and Enhancement has been created, and the College has identified some particular priority areas for enhancement.

4.12   Although the College has produced a strategy document for enhancement, the team identified that this needs further development as it lacks detail on how enhancement will be operationalised, leading to the recommendation in this Expectation. The review team affirms the action being taken to introduce work-based learning as an enhancement objective. There are no identified features of good practice in this judgement area.

4.13   The single Expectation in this judgement area is met with an associated moderate risk. The moderate risk reflects the fact that, because of its situation at the time of the review, the College was not able to demonstrate the effective operation of its enhancement mechanisms in practice.

4.14   The review team concludes that the enhancement of student learning opportunities at the College **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.