

### Higher Education Review (Alternative Providers) of Luton International College Limited

October 2015

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#### About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at Luton International College Limited. The review took place from 13 to 14 October 2015 and was conducted by a team of two reviewers, as follows:

- Professor Christopher Clare
- Dr Elaine Crosthwaite.

The main purpose of the review was to investigate the higher education provided by Luton International College Limited and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the <u>UK Quality Code for Higher Education</u> (the Quality Code)<sup>1</sup> setting out what all UK <u>higher</u> <u>education providers</u> 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 threshold academic standards
  - the quality of student learning opportunities
  - the information provided about higher education provision
  - the enhancement of student learning opportunities
  - provides a commentary on the selected theme
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

In Higher Education Review (Alternative Providers) there is also a check on the provider's financial sustainability, management and governance (FSMG). This check has the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure of their education provider.

A summary of the findings can be found in the section starting on page 2. <u>Explanations of the findings</u> are given in numbered paragraphs in the section starting on page 5.

In reviewing Luton International College Limited the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland. The <u>themes</u> for the academic year 2015-16 are Digital Literacy and Student Employability,<sup>2</sup> and the provider is required to select, in consultation with student representatives, one of these themes to be explored through the review process.

The QAA website gives more information <u>about QAA</u> and its mission.<sup>3</sup> A dedicated section explains the method for <u>Higher Education Review (Alternative Providers)</u>.<sup>4</sup> For an explanation of terms see the <u>glossary</u> at the end of this report.

<sup>&</sup>lt;sup>1</sup> The UK Quality Code for Higher Education is published at: <u>www.qaa.ac.uk/quality-code</u>. <sup>2</sup> Higher Education Review themes: <u>www.qaa.ac.uk/publications/information-and-</u> <u>guidance/publication?PubID=106</u>.

<sup>&</sup>lt;sup>3</sup> QAA website: www.qaa.ac.uk/about-us.

<sup>&</sup>lt;sup>4</sup> Higher Education Review (Plus): <u>www.qaa.ac.uk/en/ReviewsAndReports/Pages/Educational-Oversight-.aspx</u>.

#### Key findings

#### **QAA's judgements about Luton International College Limited**

The QAA review team formed the following judgements about the higher education provision at Luton International College Limited.

- The maintenance of the academic standards of awards offered on behalf of its awarding organisation **meets** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities **requires improvement to meet** UK expectations.
- The enhancement of student learning opportunities **does not meet** UK expectations.

#### **Good practice**

The QAA review team identified no features of **good practice** at Luton International College Limited.

#### Recommendations

The QAA review team makes the following **recommendations** to Luton International College Limited.

By May 2016:

- ensure that the committee structure and terms of reference secure effective oversight of academic standards, the quality of learning opportunities, and student representation at College level (Expectations A2.1, B5 and B7)
- ensure that academic planning and decision-making is informed by independent external expertise (Expectation A3.4)
- ensure effective involvement of academic staff in programme development and approval (Expectations B1 and A3.1)
- implement a clear and consistent policy to ensure that academic staff are appropriately qualified to teach at higher education levels (Expectation B3)
- establish approaches that enable students to develop as independent learners (Expectation B3)
- develop students' preparedness for employment, including opportunities for work-based and placement learning in its programmes (Expectation B4)
- establish and articulate processes for monitoring student progression and achievement (Expectation B4)
- ensure that teaching staff are present at meetings of the Staff-Student Committee (Expectation B5)
- revise the Appeals Policy to ensure that it is effectively differentiated from the Complaints Policy (Expectation B9)
- develop and maintain a source of reference that details college-wide policies and procedures for the management of quality and standards (Expectation C)
- develop and implement procedures to ensure the effective operation of the its website (Expectation C)
- develop, implement and promulgate a policy for strategic enhancement of learning opportunities, including structures and processes for identification and dissemination of good practice (Enhancement).

#### Affirmation of action being taken

The QAA review team made no **affirmations** of actions that Luton International College Limited is already taking to make academic standards secure and/or improve the educational provision offered to its students.

#### **Theme: Digital Literacy**

Luton International College Limited's focus with regard to digital literacy is related to equipping students with adequate digital skills to meet job requirements and be employment-ready. In linking the development of digital literacy with the development of employability, it takes particular account of the need to increase awareness of the importance of digital skills for professional development, and the need to enhance digital skills by embedding them in the curriculum.

The College intends to offer sessions to make students aware of various aspects of the analysis and management of data and information, and to increase awareness of the requirements of digital skills in the employment market.

Teaching staff are encouraged to include digital skills requirements as part of their lesson plans; to include relevant digital skills in formative assessments; to provide feedback on how to develop digital skills; and, where possible, to exploit digital skills in summative assessments.

Further explanation of the key findings can be found in the handbook available on the QAA webpage explaining <u>Higher Education Review (Alternative Providers)</u>.

#### **About Luton International College Limited**

Luton International College Limited (the College) was founded in 2003, and since 2012 has been an approved centre for the delivery of qualifications awarded by Pearson, specifically Higher National Certificates and Higher National Diplomas in Business, and Health and Social Care, and the level 7 Extended Diploma in Strategic Management and Leadership. It occupies a site in the central area of Luton, where it aims to create a learning environment in which students and staff engage collaboratively in the learning process.

The College has five full-time and six part-time staff. At the time of the review visit the College had no students enrolled on its higher education programmes. Its key challenge is to attract and recruit students to its programmes, for which its target markets are its own locality as well as the rest of the European Union and overseas, particularly the Middle East. Further to that challenge, and with a view to building up its student body, the College aspires also to build a team of academic staff who are able to deliver higher education to a high quality, to maintain high academic standards and to oversee its plans for expansion. At the same time it aims to assess and review its physical infrastructure with the needs of an expanded student body in mind.

This review formed the College's first engagement with the QAA. The College has in 2012, 2013 and 2014 been the subject of reviews by the Independent Schools Inspectorate: the outcomes of these reviews were favourable.

# Explanation of the findings about Luton International College Limited

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

# 1 Judgement: The maintenance of the academic standards of awards offered on behalf of awarding organisations

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

a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* 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 offers three higher education programmes, although none has any students enrolled at present: a Higher National Certificate and Diploma (HNC/D) in Health and Social Care; a HNC/D in Business; and a Qualifications and Credit Framework (QCF) level 7 Extended Diploma in Strategic Management and Leadership. The awarding organisation in each case is Pearson.

1.2 The setting of standards is the responsibility of Pearson, which determines the alignment of programmes with *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ), the QCF and Subject Benchmark Statements. The College relies on Pearson to ensure that threshold academic standards are met. The College makes no use of centre-defined modules. The arrangements described above would enable the Expectation to be met.

1.3 The review team tested the College's engagement with these reference points by reviewing agreements, programme specifications and module specifications, and in meetings with College staff.

1.4 The College's regulatory infrastructure is sound. Programme specifications clearly state learning outcomes, modules and assessment for each programme. Module learning

outcomes are appropriately specified at levels 4 and 5. Module specifications detail the volume of assessment in each module and the learning outcomes being assessed.

1.5 Threshold academic standards are secured, as the College is delivering programmes and modules approved by Pearson in accordance with its own standards, which themselves align with national frameworks and standards. The review team concludes that Expectation A1 is met and the associated level of risk is low.

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

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

#### Findings

1.6 The awarding organisation has responsibility for setting standards, and the College for maintaining them. The College's Academic Standards and Quality Assurance Committee (ASQA) is 'guardian of academic standards and quality assurance'; the terms of reference of this committee bear this description out. Although the review team learned that this committee was to be reconstituted as the Academic Board, with revised terms of reference, this has yet to be accomplished.

1.7 There is a Senior Management Team (SMT), with terms of reference that indicate that it governs the executive management of the College. A committee structure shows a dotted line relationship between the SMT and ASQA to indicate the link between the executive and deliberative structures in the College. These arrangements would enable the Expectation to be met.

1.8 The review team discussed the committee structure and terms of reference with staff. The team also read sets of SMT and ASQA minutes.

1.9 The review team was informed that the committee structure and terms of reference are to be amended to reflect the creation of the Academic Board and the reconstitution of the Teachers' Committee into a programme committee. Given the small number of staff, it was clear that there is considerable overlap of committee membership.

1.10 Inspection of the minutes for the SMT and ASQA indicated some mismatch between the terms of reference and the meeting attendance, in terms of the membership. The review team also noted that, although the latest version of the ASQA terms of reference indicated student membership, this had not been implemented. The team considered that these issues show an ineffective implementation of the committee structure and that this gives further weight to the need to revise the terms of reference of all College committees. The review team therefore **recommends** that the College ensure that the committee structure and terms of reference secure effective oversight of academic standards, the quality of learning opportunities, and student representation at College level.

1.11 Although the review team inspected a number of policy and procedure documents relating to various aspects of the management of academic standards and the quality of learning opportunities, there is no overall quality handbook or internal code of practice where these are brought together for the benefit of teaching and other staff. This issue is discussed further under Expectation C.

1.12 The review team found that there are deficiencies in the College's management of its responsibilities for the maintenance of academic standards. Therefore, the review team concludes that Expectation A2.1 is not met and the associated level of risk is moderate.

Expectation: Not 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

1.13 The College has designed its own form of programme specification based on the qualification specification used by Pearson. The student handbook provides comprehensive College-level information, including details of various policies and procedures, such as the Complaints Policy, and would enable the Expectation to be met.

1.14 In order to test their effectiveness, the review team looked in detail at the programme specifications, student handbook and module specifications, and, in meetings with staff, tested their understanding of this process for publishing and maintaining definitive documentation.

1.15 The review team was unable to test the effectiveness of the specifications and handbook with current students, although former students met by the team confirmed that they did have access to programme and module information that was clear and accurate.

1.16 The programme specification is well laid out and provides clear programme-level information, including programme aims and learning outcomes. It describes the structure of the programme, and lists the modules and their credit values, but does not give module-level detail. Programme specifications are informed by the relevant Subject Benchmark Statements and the FHEQ, and have information on the delivery context. Module specifications do appear in the programme handbook. The programme specifications and module specifications are also available to students via the virtual learning environment (VLE). These documents are generally comprehensive, accurate and user friendly.

1.17 The review team found that the College manages its responsibilities for the maintenance of records of programmes in line with the requirements of its awarding organisation. Therefore, the review team concludes that Expectation A2.2 is met and the associated level of risk is low.

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

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

#### Findings

1.18 The College's programmes are designed and approved by Pearson, which holds responsibility for ensuring that qualifications meet national academic standards. Pearson delegates the selection of optional units and the initial assessment of learning outcomes for all units to the College.

1.19 The Pearson Standards Verifier checks that national standards are met in the assessments conducted by the College, and can make recommendations if these are not set at the right level.

1.20 The processes for programme design and ensuring that academic standards are appropriately set rest with Pearson. As the programmes and their component units are obtained 'off-the-shelf' from Pearson, the College relies on Pearson to ensure that academic standards are set at a level that meets UK threshold standards. College policies set out the arrangements for assessment to address the requirements of its awarding organisation.

1.21 The College has a committee structure, and the terms of reference indicate that ASQA has overall responsibility for programmes and implementing Pearson's policies and regulations. ASQA reports to the SMT, which is responsible for approving new programme proposals. The processes described above would enable the College to meet the Expectation.

1.22 The review team considered the effectiveness of these practices by examining Pearson's approval and programme documentation, the Standards Verifier's report, College programme specifications, and minutes of meetings. The team also held meetings with the Principal, senior staff and teaching staff.

1.23 The review team found that the process for approval of taught programmes is operating satisfactorily in so far as it entails the selection of optional units that are designed by Pearson. This is assisted by the small scale of the provision and overlapping staff membership of committees. College staff have a clear understanding of their responsibilities and draw on their experience in working on similar programmes with other providers. SMT makes final decisions on programme approval; however, the lack of academic staff membership on this team contributes to the recommendation in Expectation B1 relating to the involvement of academic staff in programme development and approval.

1.24 Within the context of the centre approval granted by Pearson, the evidence from documentation and meetings shows that the College is fulfilling its responsibilities for programme approval. The processes for approval are straightforward and understood by staff, although not expressed in written form. The review team concludes that Expectation A3.1 is met, however, the lack of effective academic staff involvement in approval processes constitutes a shortcoming in the rigour with which the procedure is applied. The associated level of risk is therefore moderate.

Expectation: Met Level of risk: Moderate 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

1.25 The College's awarding organisation, Pearson, sets the academic standards for the qualifications and checks the achievement of learning outcomes and alignment with national standards through sampling by Standards Verifiers.

1.26 Pearson provides the unit specifications, which state the learning outcomes to be assessed. The College designs the assessment of unit-learning outcomes. Assignment briefs describe the task requirements and marking criteria. The first marking of student work is verified by an internal verifier, and finalised in a standardisation meeting before being submitted for external moderation.

1.27 The College carries out assessment of learning outcomes in accordance with Pearson's policies. There is a committee structure and procedures to monitor and review assessment processes and compliance with Pearson's requirements. The Standardisation Committee checks that the design of assignment briefs enables learning outcomes to be addressed. The Internal Verification Policy provides for the verification of assignment briefs prior to issue and the verification of assessment decisions. An Assessment Committee has been established to confirm students' marks and grades, and monitor the results and awards conferred. The procedures describe above would allow the College to meet the Expectation.

1.28 The review team reviewed the effectiveness of these practices and procedures by examining documentation, including programme specifications and assignment briefs, assessment and verification policies and procedures, the Standards Verifier's report, and minutes of the Assessment Committee. The team also held meetings with senior staff and teaching staff.

1.29 The evidence reviewed showed that policies and procedures are effective in practice. Assessment specifications are clear and comprehensive. The College has internal processes to ensure that assessment is fair and appropriate and enables achievement of learning outcomes. Assessment decisions are externally verified by Pearson. The Standards Verifier's report confirms that the design of assessments enables students to demonstrate that they meet learning outcomes at an appropriate level.

1.30 The review team considers that there are suitable processes for ensuring reliable assessment, and for alignment with Pearson's requirements. Therefore, the review team concludes that Expectation A3.2 is met and the associated level of risk is low.

Expectation: Met Level of risk: Low Higher Education Review (Alternative Providers) of Luton International College Limited

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

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

#### Findings

1.31 The monitoring and review of the academic standards of programmes is undertaken to meet Pearson's requirements. The Standards Verifier samples assessments to check if student performance is meeting academic standards, and the Standards Verifier's report comments on the maintenance of academic standards.

1.32 The College also has its own internal processes, which entail preparation of an annual monitoring report for each programme, and monitoring of subsequent actions through College committees.

1.33 The terms of reference of ASQA include ensuring that annual monitoring takes place and making recommendations in response to the outcomes of the process. The Assessment Committee, a subcommittee of ASQA, is responsible for monitoring student assessment, drawing on the Standards Verifier's report and recommendations of the Standardisation Committee. Together these committees work to monitor that the academic standards required by Pearson are maintained. However, the terms of reference of ASQA are deficient, as they do not indicate that it receives reports from the Assessment Committee.

1.34 There is a standard report template for the internal annual monitoring report for each programme and an action plan template for providing responses to the Standards Verifier's recommendations. The College is in the process of developing a formal policy for internal programme review. Together, the processes described above would allow the College to meet Expectation A3.3.

1.35 The review team tested the effectiveness of the College's practices by examining relevant documentation, including the annual monitoring report and action plan, and minutes of committee meetings. The team also held meetings with the Principal, senior staff and teaching staff.

1.36 The College follows Pearson's processes for programme monitoring and review, and also has its own effective internal processes. College staff prepare an annual monitoring report for each programme using a standard template. The recommendations of the Standards Verifier inform the annual monitoring report and action plan. The action plans are monitored through internal committee meetings.

1.37 The College intends that ASQA, reconstituted as an Academic Board, with appropriate academic membership, will be responsible for the monitoring and review of future programmes. As a consequence, the Academic Board will have a revised membership and responsibilities, and these new processes are not yet finalised.

1.38 The evidence from documentation and meetings shows that the College has systems in place for programme monitoring and review, and is operating in accordance with the requirements of its awarding organisation. The review team therefore concludes that Expectation A3.3 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

1.39 The responsibility for engaging external and independent expertise largely rests with Pearson, which undertakes external examination in the form of standards verification to check that College assessment decisions meet national standards. A Standards Verifier, who is a subject expert, is allocated to conduct sampling of assessed student work, and provide verbal feedback and a formal report. This identifies good practice and areas for development and gives guidance on how to improve delivery. The College uses the guidance of the Standards Verifier in internal processes.

1.40 The College has processes for engaging with the Standards Verifier by review of the Standards Verifier's report, reflection in the annual monitoring process, and monitoring of actions arising from the report. Formal responses are made to issues raised in the reports, and the resultant actions are monitored by appropriate committees.

1.41 The College draws on external expertise in other higher education institutions through employing senior staff and part-time teaching staff who work in other institutions. These links assist in setting and maintaining academic standards. The processes to use external and independent expertise would allow the College to meet the Expectation.

1.42 The review team tested the effectiveness of the College's arrangements by considering the annual monitoring report and action plan, the Standards Verifier's report and minutes of committee meetings. The team also held meetings with the Principal, senior staff and teaching staff.

1.43 The College makes effective use of external expertise by delivering programmes and 'off-the-shelf' units developed by Pearson, and giving full consideration to the actions arising from the Standards Verifier's report. The action plan developed from the Verifier's report is reviewed and monitored by appropriate College committees. However, the College has not established processes for using external and independent expertise in committee activities, such as assessment boards and ASQA.

1.44 Currently, the College does not design and develop its own programmes, and it has not found a need to engage external expertise in this area. It does make extensive use of the expertise of employees who are academic staff in other higher education institutions as advisers on academic standards in ASQA and Teacher's Committee. While these links certainly provide a broader perspective on academic standards, they do not provide independent external expertise. The use of further independent external expertise would assist in the College's future programme developments. These include obtaining an awareness of good practice in programme monitoring and review processes, and in the development of student employability; and in the development of partnership links with a UK university. The review team therefore **recommends** that the College ensure that academic planning and decision-making is informed by independent external expertise. Higher Education Review (Alternative Providers) of Luton International College Limited

1.45 The review team considers that the College makes effective use of independent external expertise in addressing the requirements of its awarding organisation in respect of assessment processes and the award of credit. The team concludes therefore that Expectation A3.4 is met. However, as the lack of independent external expertise relating to academic planning and decision-making constitutes a weakness in the College's governance structure, the associated level of risk is moderate.

Expectation: Met Level of risk: Moderate

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

1.46 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. One of the seven Expectations for this judgement area has not been met; the level of risk is judged to be moderate for this Expectation and also to be moderate for two others.

1.47 The standards of the awards offered by the College are secure, in that they are set by Pearson, its awarding organisation. The College has effective frameworks for the approval of new programmes, although they are not informed by independent external expertise. Its framework for the monitoring and review of its programmes is as yet not fully tested. Definitive records of each programme are available and are used to govern the award of academic credit in accordance with the requirements of Pearson.

1.48 The College lacks a committee structure that secures oversight of academic standards and the quality of learning opportunities. It also fails to ensure a suitable degree of independence in gaining external advice to inform academic planning and decision-making.

1.49 There are no findings of good practice or affirmations relating to this judgement area.

1.50 The review team makes two recommendations relating to this judgement area. The first relates to the need to ensure a committee structure that secures clear and effective oversight of provision. The second follows from the lack of independent external expertise to inform planning and decision-making. In addition, a lack of effective involvement of academic staff in decision-making contributes to the recommendation in Expectation B1.

1.51 On the basis of the documentation provided and meetings with staff and former students, the review team concludes that the maintenance of the academic standards of awards offered on behalf of its awarding organisation 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's programmes are designed and developed by its awarding organisation. This includes setting the programme aims and learning outcomes, unit aims and learning outcomes, credit value and unit content. The College undertakes the selection of appropriate units relevant to students' needs and the local context, and prepares schemes of work and assessments.

2.2 The Pearson Standards Verifier checks that the College has designed effective assessment instruments for the programme and units being delivered, and makes recommendations as appropriate.

2.3 The College obtains 'off-the-shelf' programmes and units from Pearson, which conducts the processes of design, development and approval of programmes and their component units. The selection of programmes and units is made in light of the College's Strategic Plan and with consideration of the market demand and employability opportunities for students. ASQA makes decisions on the optional units to be delivered within the programmes, after consultation with teaching and other staff. SMT has the final authority for decisions on the advice of supporting committees.

2.4 The College does not have procedures for developing its own programmes for validation by an awarding body. It aspires to develop a partnership with a UK university and to provide student progression opportunities through top-up programmes. The College processes for programme approval would allow it to meet Expectation B1.

2.5 The review team considered the effectiveness of the College's processes and procedures by examining Pearson's approval and programme documentation, programme specifications, committee terms of reference and minutes of meetings. The team also held meetings with the Principal, senior staff and teaching staff.

2.6 The review team found that the process of programme design, development and approval is operating satisfactorily, as this relies significantly on Pearson's arrangements. The College's responsibility entails the selection of off-the-shelf units for Pearson-approved programmes, and deciding the order in which they are delivered. This is undertaken through discussion and decision by ASQA, although the terms of reference for the committee do not specifically refer to this responsibility. Recent discussion of the selection of optional units shows that the College intends to offer those units with which it has had previous experience of delivery.

2.7 Procedure documents for the design and development process are being formalised, and are not yet written down for staff reference, as discussed under Expectation C. The procedures will include consultation with students and their representatives, inputs from external experts with subject and industry experience, and discussion with staff in committees. The College refers to an internal review of programmes every four to six years

to check alignment with strategic objectives, but as delivery of the programmes dates from 2012, this process remains to be developed and tested.

2.8 SMT is responsible for final decisions on the suitability of programmes following consultation with teaching staff and other staff, including the Marketing Manager. The terms of reference for this team do not include academic staff membership, although in practice, the course coordinator has attended meetings. The review team therefore **recommends** that the College ensures effective involvement of academic staff in programme development and approval.

2.9 The Pearson Standards Verifier's report states that the College has effective mechanisms in place for the ongoing development of programmes. It makes recommendations on unit assessment design and teaching methods that the College has taken steps to address.

2.10 The College's approach to programme design and development enables it to meet the requirements of its awarding organisation. The review team concludes therefore that Expectation B1 is met. However, the lack of formal procedures for the design, development and approval of programmes, and the lack of effective involvement of academic staff in programme development and approval, indicate weaknesses in the College's governance structure. The level of associated risk is therefore moderate.

Expectation: Met Level of risk: Moderate Higher Education Review (Alternative Providers) of Luton International College Limited

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

2.11 The College has an Admissions Policy that sets out clearly a process for fair recruitment, selection and admission of students. It also displays commitment to the principles of equal opportunity. The Policy is openly available on the College website, and articulates an appropriate set of expectations that students can have of the College in going through the admissions process.

2.12 The Admissions Policy makes provision for students with disabilities and specifies English language requirements. Pearson provides guidance on the entry criteria for programmes, and delegates the recruitment and assessment of the suitability of applicants to the College. The website is the main source of information for prospective students. The College's policies and procedures would enable the Expectation to be met.

2.13 The review team inspected the Admissions Policy and, in its meetings with staff, discussed its implementation, in terms of the roles of various staff. Owing to there being no current students, the team was unable to test the effectiveness of its implementation with them, but did speak to former students.

2.14 The Admissions Policy refers to a Director of Admissions but the review team learned that this role was undertaken by the Marketing Manager. There is also a section on admissions in the student handbook.

2.15 The College claims that the Admissions Policy is reviewed on a regular basis. However, the review team was unable to secure any evidence of such reviews.

2.16 The Marketing Manager coordinates the recruitment and admission of students. Other staff, including the course coordinator and academic staff are consulted on the individual admissions decisions. Staff involved in the admissions process are given training by the Principal to apply the Admissions Policy and procedures. There are procedures in place for the assessment and recognition of prior learning as part of the admissions process.

2.17 The College provides an entry pack, student handbook and induction material to enrolled students. The pack and handbook are clear and user-friendly, covering general College information as well as course-specific information.

2.18 The College has mapped its procedures to the Quality Code and identified minor actions relating to feedback to unsuccessful applicants, use of student data to inform strategy, and the desirability of offering visits to prospective students to help them make an informed decision about their choice of programme.

2.19 Former students confirmed that the recruitment and admissions information from the College was clear and accurate. They also gave details of comprehensive and effective induction processes.

2.20 The review team concludes that Expectation B2 is met and the associated level of risk is low.

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

#### Quality Code, Chapter B3: Learning and Teaching

#### Findings

2.21 'High Quality Education' is a main focus of the Strategic Plan. There is also a Learning and Teaching Strategy, which has nine strategic objectives, statements on quality assurance and statements of intent on professional development. There are also statements of commitment on resources, recruitment and retention in the Strategic Plan.

2.22 Procedures to maintain the quality of provision include a Staff Development Policy, an appraisal process, teaching observation scheme, and a staff development programme to support new staff and update experienced staff. Staff development sessions cover themes such as student feedback, external examiners' reports, and teaching observation. These arrangements would enable the Expectation to be met.

2.23 The review team inspected the strategy documents, lesson plans and the documentation relating to student feedback. It also inspected the documentation presented relating to the recruitment and development of staff. In its meetings with staff, the team discussed the implementation, in terms of the roles of various staff, and the appraisal, teaching observation and staff development processes. Due to there being no current students, the team was unable to test the effectiveness of the current procedures for securing and reporting student feedback.

2.24 Lesson plans are clear and concise, and developed to a standard template. Staff are responsible for developing lesson plans, which are based on material from a central bank. Individual members of staff may develop their own lesson plans subject to approval by the course coordinator. Lesson plans and supporting materials are posted on the VLE.

2.25 Samples of feedback on student work were adequate, if rather succinct. However, former students met by the review team confirmed that feedback on assessment was timely and useful, and that they were able to follow up individual points with members of staff.

2.26 The student feedback template includes a section for a commentary on learning resources, and the College claims that it conducts regular assessments of teaching and learning resources. However, minutes of SMT and ASQA fail to show any detailed consideration of learning resources.

2.27 The College recognises the importance of employing well qualified teaching staff. Although it does not require academic staff to hold a teaching qualification, it seeks to recruit staff qualified in the relevant subject area to levels higher than those being taught, normally at least to master's level. Nevertheless, the review team noted some lack of staff understanding of the need to develop students as independent learners through teaching and assessment processes. In considering that an understanding of such development may be stronger had more staff undertaken training or development specifically related to teaching at higher education levels, the review team **recommends** that the College implement a clear and consistent policy to ensure that academic staff are appropriately qualified to teach at higher education levels. Academic staff indicated that they intend to use material from students' experience, and IT, to empower students, however, there was no clear articulation of teaching practices that engage students in their learning. Therefore, the review team also **recommends** that the College establish approaches that enable students to develop as independent learners.

2.28 The College drew attention to the expansion of its staff development programmes and provided a Staff Professional Development Policy. This is comprehensive and refers to continuing professional development logging, development plans, annual appraisal and professional development questionnaires. Staff confirmed that opportunities for development can be explored from either side in appraisal meetings. While teaching staff are required to keep up to date with their subject matter and pedagogy, the means of doing so are not formalised.

2.29 Senior staff commented on the difficulty in attracting staff given the lack of current students at the College. However, recently appointed members of academic and support staff described a sound staff recruitment and induction process. Senior staff acknowledged a gender imbalance among teaching staff of the College and were enthusiastic in expressing an intention to address this imbalance.

2.30 Teaching staff confirmed that there is a scheme for informal, developmental peer observation of teaching whose outcomes are discussed between the teacher and the observer after the class; these observations are unrelated to the appraisal system. Staff viewed this as a useful part of the developmental process.

2.31 There is also a more formal teaching observation scheme, with outcomes used to inform the staff appraisal process. Although observations can be undertaken by any of the College's nominated appraisers, the Principal has undertaken all such observations to date.

2.32 Although the composition of the Teachers' Committee includes 'relevant lecturers' as members, recent minutes showed that the only member of academic staff present was the course coordinator. The agenda includes a number of issues relating to teaching and learning, but the effectiveness is difficult to assess as no discussion has taken place or been recorded.

2.33 Part-time lecturers form the majority of the teaching staff of the College, and are subject to similar appraisal and observation procedures as (and are offered similar development opportunities to) permanent staff. The College has aspirations to introduce more full-time permanent staff but this will depend on student recruitment.

2.34 The review team concludes that Expectation B3 is met. However, the lack of approaches to teaching that develop independent learning, and the lack of a consistent policy in respect of the appointment of qualified teaching staff, indicative insufficient emphasis given to assuring quality in the College's planning processes. The level of associated risk is therefore moderate.

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

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

#### Findings

2.35 The College's higher education strategy focuses on the delivery of programmes that prepare students for employment in professional careers. The Teaching And Learning Strategy outlines the support given to students, including tutorials and an individual learning plan. The student handbook contains some advice on employability.

2.36 The College previously recruited primarily international students, and their language skills presented a challenge to the College. The current focus is on recruiting students in UK, European Union and Middle Eastern markets.

2.37 Where students have language difficulties, they are offered English language classes to increase their proficiency. Prospective students are asked to declare any disabilities and staff are encouraged to look out for any learning disabilities so that support arrangements can be put in place. The College monitors students in order to identify any difficulties and provide further support.

2.38 The College has recently invested in learning resources, including IT resources and the development of a VLE. The arrangements described above would allow the Expectation to be met.

2.39 The review team explored how the College develops students' skills in order to prepare them for employment by reading relevant documentation, including minutes of meetings, and through meetings with staff. The team also met a group of former students. The team was given a demonstration of the VLE.

2.40 The College claims that real-life situations derived from case studies are used, however, there are no formal guidelines or support for staff for the integration of such skills into lesson plans. Although the College provides workshops and guest speakers, none of its programmes afford work-based or placement learning opportunities. Noting that the College aspires to prepare students for employment and for professional careers, the review team **recommends** that the College develop students' preparedness for employment, including opportunities for work-based and placement learning in its programmes.

2.41 Teaching staff confirmed that the College has an integrated information system capable of producing reports on student admission, assessment and achievement. Nevertheless, although monitoring of student achievement forms part of the remit of ASQA, the proposed changes to the committees and terms of reference will need to ensure that monitoring student achievement is the clear responsibility of the new Academic Board. At present, there are no clear procedures for doing so. Consequently, the review team **recommends** that the College establish and articulate processes for monitoring student progression and achievement.

2.42 ASQA, which is being reconstituted, is referred to as having a role in monitoring student feedback, engagement, and complaints and appeals, but there is no evidence provided to support this in the minutes.

2.43 The College has no clear policy in respect of the provision of academic and pastoral support for students, although some aspects of support are referred to in student handbooks. In a meeting with staff, the College confirmed that personal tutoring takes place.

Staff exploit the small size of the College and encourage students to raise issues with any member of the staff team, an approach which the review team found justifiable given the preponderance of part-time lecturers. Former students confirmed this approach and expressed satisfaction with the support that they received at all levels.

2.44 The College's library contains core texts, and students additionally may make use of nearby public libraries. This provided additional support to the VLE. Teaching staff confirmed that they find the VLE to be a useful and comprehensive support tool. The College has plans to secure a licence for plagiarism-detection software to be linked to the VLE, enabling students to submit their work through this software.

2.45 The review team concludes that Expectation B4 is met. However, shortcomings in respect of students' preparedness for employment and processes for monitoring student progression indicative that insufficient emphasis is given to assuring quality in the College's planning processes. The level of associated risk is therefore moderate.

Expectation: Met Level of risk: Moderate Higher Education Review (Alternative Providers) of Luton International College Limited

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 The College has mechanisms for engaging students in the quality assurance and enhancement of their educational experience both formally and informally. There is a Staff-Student Committee, where students are invited to comment on their experience. The College is currently strengthening its student representative system.

2.47 Feedback arrangements are set out in the student handbook and entail student completion of a survey questionnaire in each semester. In addition, there are opportunities for students to provide feedback through informal means by discussion with College staff. These processes would enable the Expectation to be met.

2.48 The review team inspected the terms of reference of the committees and the documentation provided on student feedback questionnaires. In its meetings with staff, the review team discussed the implementation, in terms of the roles of various staff and committees. Due to there being no current students, the team was unable to test the effectiveness of its implementation.

2.49 The Staff-Student Committee is intended to form part of the process for involving students in the assurance and enhancement of their educational experience. The committee was referred to in a SMT meeting and action was sanctioned (on field trips). The terms of reference of the Staff-Student Committee show that its membership includes a member of administrative/support staff in addition to students, but no members of academic staff. The minutes of these meetings show that academic members of staff were present on only one occasion. With a view to ensuring that students have opportunities to discuss issues relating to their learning with members of academic staff, the review team **recommends** that the College ensure that teaching staff are present at meetings of the Staff-Student Committee.

2.50 Although there is a student feedback template, no examples of any completed reports based on it were provided. Nevertheless, former students and staff confirmed that questionnaires are issued at the end of each semester for each module, and that results are analysed and used in the annual monitoring process. While there was no direct feedback to students on actions resulting, former students expressed the view that the College did listen to their views and took action when possible. In addition, students may provide feedback through informal means in discussion with College staff.

2.51 The terms of reference of ASQA indicate student representation. However, there was no evidence of the effectiveness of this approach, as its minutes suggest that no student representatives have yet attended meetings. The lack of student representation on ASQA and the programme committee supports the recommendation under Expectation A2.1.

2.52 The review team noted the lack of consistent student representation on the College committees, the lack of consistent representation of the academic staff on the Staff-Student Committee and the lack of clarity in how the results of student feedback are reported and monitored. The review team concludes therefore that the Expectation is not met. These shortcomings are indicative of weaknesses in the operation of the College's governance structure. The level of associated risk is therefore moderate.

Expectation: Not 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

2.53 The College is required to comply with the assessment policies and procedures of its awarding organisation, which are specified in BTEC documentation and detailed in the College's Assessment Policy. Pearson undertakes external examination and final verification that the College is assessing to the national standards set out in BTEC qualification specifications. The initial assessment of learning outcomes for all units is delegated to the College. This entails responsibility for the design of assessment tasks, first marking of student work, second marking by internal verification, and giving feedback to students on their work.

2.54 The College has set out a comprehensive Assessment Policy covering its arrangements for assessment, internal verification, provision of assessment feedback to students, procedures for dealing with malpractice, plagiarism, appeals, and the recognition of prior learning.

2.55 College tutors design formative and summative assessments for the units they are teaching. The proposed assessments are internally verified and finalised in a standardisation meeting before being sent for external moderation. After receiving the finalised version from the external moderator, assignment briefs are distributed to the students and posted on the VLE.

2.56 The Pearson Standards Verifier checks whether the assessment instruments are effective and appropriate to the qualification level, and makes recommendations as appropriate. The College's policies and procedures for assessment and its approach to complying with Pearson's requirements would allow it to meet the Expectation.

2.57 The review team reviewed the effectiveness of the processes by examining documentation, including the Assessment Policy, Internal Verification Policy, Pearson Standards Verifier's report, programme specifications and student handbooks, and committee minutes. The team also held meetings with the Principal, senior staff, teaching staff and former students.

2.58 The College has effective processes in place to conduct assessment and meet the requirements of Pearson. There is a course coordinator who has overall responsibility for the management of assessment. The sample assignment briefs are clear and comprehensive, and refer directly to the learning outcomes they are designed to meet. There is a full internal verification and standardisation process in place, and evidence of the use of external verification through the Pearson Standards Verifier.

2.59 Programme and module handbooks clearly specify the intended learning outcomes and assessment criteria. The student handbook indicates the requirements for submission of assessments, as well as plagiarism and collusion policies. The College draws the attention of students to the penalties for academic malpractice and plagiarism, and intends to use plagiarism-detection software. Former students expressed satisfaction with the constructive and developmental feedback received on both formative and summative assessments, and with the speed with which feedback was received after submission.

2.60 The Standards Verifier's report shows that the design and nature of assignment briefs enables students to demonstrate that they can meet the outcomes of the programme at an appropriate level. However, the Standards Verifier recommended that the College broadens the range of assessment activities beyond written reporting; this is being addressed in planning for the next student intake.

2.61 The Standards Verifier also recommended that the College establish assessment meetings with a preset agenda to review individual student performance on a unit basis, including consideration of academic misconduct. The College is now formalising arrangements to hold assessment boards for its programmes and track the progress of individual students.

2.62 The recognition of prior learning is guided by Pearson requirements, and the College has devised a Recognition of Prior Learning Policy, which entails interviews with candidates. No current applicants are eligible for consideration under the Policy.

2.63 There is documentary evidence that the assessment processes previously in use were valid and reliable, and the College intends to continue to implement these processes. The review team therefore concludes that Expectation B6 is met and the associated level of risk is low.

Expectation: Met Level of risk: Low

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

#### Quality Code, Chapter B7: External Examining

#### Findings

2.64 The College's awarding organisation is responsible for defining the role of external examiners and for their appointment, training and recognition. External examiners undertake standards verification through sampling of assessed work, and check that timely and effective internal verification has been carried out on assessment decisions and there is appropriate feedback to students.

2.65 The College is responsible for communicating with external examiners regarding the samples of assessed work to be provided, arrangements for their visits, and for responding to external examiner reports.

2.66 During a visit to the College, external examiners are briefed about the College's quality framework and given a tour to make an assessment of physical facilities and learning resources. The external examiner also meets teaching staff to provide feedback on the sampling process.

2.67 The College has internal systems for receiving and responding to external examiners' reports, which are available online through its portal for the course coordinator to download and circulate for discussion. The College intends to place external examiners' reports on the College VLE in order that students can read them.

2.68 The College responds directly to external examiners' reports with an action plan and then incorporates issues raised into internal monitoring and review processes. The programme annual monitoring report summarises the feedback and recommendations received from the external examiner and provides an action plan with responsibilities and timeline. ASQA receives the annual monitoring and external examiners' reports, and makes recommendations for action. The terms of reference of the Assessment Committee include taking an overview of external examiners' reports and advising the Academic Board on any actions relating to assessment processes. The arrangements to engage with external examiners, as described above, would allow the College to meet the Expectation.

2.69 The review team reviewed the effectiveness of these procedures in practice through consideration of Pearson guidance, the Standards Verifier's report, the annual monitoring report and action plan, and minutes of committee meetings. The team also held meetings with the Principal, senior staff and teaching staff.

2.70 There is documentary evidence that the College has made appropriate use of an external examiner's report in the past, and has processes to continue to engage with external examining. These include implementing the recommendations of the Standards Verifier's report for assessment boards with standard agenda, and broadening the range of assessment tasks in assignments.

2.71 ASQA has responsibility for receiving external examiners' reports, but the committee's terms of reference and minutes do not make clear whether it has responsibility for monitoring the completion of any actions arising from those reports. The review team heard that ASQA is to be reconstituted as the Academic Board, with revised terms of reference. Therefore, the College's effectiveness in engaging with external examiners depends on the establishment of a committee structure that secures effective oversight of academic standards, as recommended under Expectation A2.1.

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2.72 The review team found that the College makes effective use of external examiners in line with the requirements of its awarding organisation. The team concludes therefore that the Expectation is met. However, the lack of clarity about responsibilities for monitoring completion of actions arising from external examiners' reports constitutes a weakness in the College's governance structure. The level of associated risk is therefore moderate.

Expectation: Met Level of risk: Moderate 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

2.73 The College has internal processes for the monitoring and review of programmes, which include student surveys, module feedback and annual reporting. The course coordinator produces an annual monitoring report, which is submitted to ASQA.

2.74 The College conducts annual monitoring of each programme using a comprehensive standardised template, which includes sections for recording staff, student and awarding organisation feedback, progression data and an action plan. The course coordinator obtains information for the report from sources including external examiner reports, staff reports, and an integrated information system covering admissions and assessment records. College committees provide a forum in which the annual monitoring report and follow-up actions are discussed. These processes, as described above, would allow the College to meet Expectation B8.

2.75 The effectiveness of the College's processes and practices was examined through relevant documentation, including the annual monitoring report and action plan, student feedback forms, committee terms of reference and minutes. The team also held meetings with senior staff, teaching staff and students.

2.76 Processes for monitoring and review for previous provision were not fully implemented through the three College committees that have a role in monitoring programme delivery. The terms of reference for the Teachers' Committee include responsibility for dealing with programme issues and advising ASQA, which is responsible for ensuring that monitoring takes place and making recommendations for action in response to the outcomes of monitoring. SMT is responsible for disseminating and helping to resolve issues arising from annual programme monitoring. However, there is no evidence from minutes of meetings that the completed annual monitoring report has been received and discussed. The College said that the process for future consideration of the annual monitoring report will be through the Teachers' Committee to ASQA.

2.77 There is evidence that appropriate College committees have reviewed programme delivery and the student learning experience, including consideration of student feedback. The terms of reference for the Staff-Student Committee provide for recommendations to be reported to SMT and Principal, who may also chair the committee.

2.78 Review processes include student completion of feedback sheets at the end of each module. Module reports are prepared by each lecturer, and collated by the course coordinator as part of the preparation of the annual monitoring report.

2.79 The College's policy is that periodic review of programmes is undertaken every four to six years, and it is in the process of developing a formal policy for programme review. As the programmes have only been running for three years, there is no evidence of periodic review or of details of procedures for undertaking this activity.

2.80 Pearson's requirements for annual reporting have been addressed by the visit of the Standards Verifier, and the College anticipates that Pearson will conduct an annual review once a further cohort of students commences their studies. The Pearson Standards

Verifier's report confirmed in the report written in 2013 that the College has effective mechanisms in place for the ongoing review and development of its programmes.

2.81 The College intends that internal processes will be in place for programme monitoring and review, including a programme committee, Staff-Student Committee, and an Academic Board with oversight of monitoring. These processes are supported by the external monitoring of standards and quality carried out by Pearson's Standards Verifier. The review team concludes that the Expectation is met, as the College has a structure and procedures for monitoring and review, and the associated level of risk is low.

Expectation: Met Level of risk: Low

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

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

#### Findings

2.82 The College has appeals and complaints policies and procedures. The procedures are clearly set out and made available to students on the College website and in the student handbook. The policy is the standard multistage process, starting with attempts at informal resolution, and would enable the Expectation to be met

2.83 The review team tested the policy and procedures by reading the documentation and meeting staff and former students. The team also inspected the VLE for access to policies and procedures.

2.84 The College does not differentiate fully between complaints and appeals. However, the College claims that staff understand the processes for managing formal and informal complaints, and formal appeals, and that students are made aware of the procedures and how to obtain support for appeals and complaints.

2.85 Although the Appeals Policy clearly articulates a procedure, there are areas where its terminology confuses complaints and grievances within the policy. Nevertheless, staff demonstrated awareness of its content and operation.

2.86 Former students expressed uncertainty about the existence and availability of the Complaints Policy, as none had ever had cause to use it. They were confident, however, that they would have been easily able to access it if necessary; the VLE shows a clear and easily accessible path to the Complaints Policy.

2.87 While staff understand the processes for managing formal and informal complaints, the College has not received any formal complaints or appeals from students, and any matters of concern have been resolved at an initial informal stage.

2.88 Nevertheless, the review team considers it important for students to be fully aware of the differences between complaints and appeals, and in particular the limits of issues that can be subject to appeal. In order to ensure that Complaints and Appeals Policies are sufficiently distinct in terms of content and terminology, the review team **recommends** that the College revise the Appeals Policy to ensure that it is effectively differentiated from the Complaints Policy.

2.89 Notwithstanding the recommendation on the differentiation of the policies, the review team concludes that Expectation B9 is met and the associated level of risk is low.

Expectation: Met Level of risk: Low

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

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

#### Findings

2.90 The College has no arrangements for delivering learning opportunities with other organisations, therefore this Expectation does not apply.

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

2.91 The College does not offer research degrees, therefore this Expectation does not apply.

#### The quality of student learning opportunities: Summary of findings

2.92 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. One of the nine applicable Expectations for this judgement area is not met. The level of risk is judged to be moderate for this Expectation and to be moderate also for four of the remaining Expectations.

2.93 There are no findings of good practice and no affirmations relating to this judgement area.

2.94 The review team makes seven recommendations relating to this judgement area. The first relates to the need to ensure effective involvement of academic staff in programme development and approval. The second follows from the lack of a clear and consistent policy to ensure that academic staff are appropriately qualified to teach at higher education levels. The third relates to approaches to learning that allow the development of students as independent learners. The fourth follows from the lack of opportunities for work-based learning in the College's programmes. The fifth concerns the desirability of processes to monitor student progression and achievement. The sixth relates to lack of participation by teaching staff in meetings of the Staff-Student Committee. The final recommendation concerns the differentiation between the procedures for appeals against outcomes of assessments and for complaints about the College's provision.

2.95 On the basis of the documentation provided and meetings with staff and former students, 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 There is a Strategic Plan that provides an overall context, mission and vision for the College. It, together with various policies and procedures, is available through the College's website.

3.2 Overall responsibility for the management of public information resides with the Principal. There is a Publications Policy that sets out interim responsibilities for website, internal and external publications, with the Policy assigning various responsibilities. These include the Administration Manager, Marketing Manager, and members of SMT. The Publications Policy describes the arrangements to ensure the accuracy of information on the College website, prospectus and internal publications.

3.3 Information is available to prospective students on the College website. After admission, students are provided with handbooks related to their programme. Students are also given module handbooks and assignment briefs. The College has attempted to map its procedures to the Quality Code, and has identified an action to update website information about study opportunities for prospective students.

3.4 The College has a VLE as an online learning platform, and states that it is in the process of developing a policy on its use and management.

3.5 The review team scrutinised the policy and student handbooks and inspected the College website. A demonstration of the VLE was given, but no direct access was provided. The review team met staff involved in the production and publication of a variety of information. The team was unable to meet current students but met former students of the College's higher education programmes.

3.6 The review team was informed that public information on programmes is vetted by the course coordinator, the Marketing Manager and the Principal. Staff also noted the responsibility of module tutors in checking the accuracy of module material and teaching plans. There is a further layer of checking with respect to the accessibility and usability of the VLE and the College website, which is the responsibility of the IT Officer.

3.7 The review team found gaps in the information provided on the College's website, principally that it was not possible at the time of the visit to access information about the HNC/D Business or HNC/D Health and Social Care programmes. In addition, the links to a variety of policies, such as the Complaints Policy, did not display those policies or how to access them. The site layout is clear and accessible, but is not fully developed: staff of the College appeared to be unaware of its shortcomings. Noting that the website fails to provide information to prospective students that is fit for purpose, the review team **recommends** that the College develop and implement procedures to ensure the effective operation of its website.

3.8 Students are provided with a handbook that sets out a range of College information and support details. They are also provided with programme handbooks, which are

comprehensive and clear. Former students confirmed that the publicity material intended for use prior to enrolment was accurate and easy to read, both in paper form and on the website, and that they received advance information about their courses, which at that time was not yet formalised into programme and module handbook form.

3.9 The College is further developing a detailed policy on who is responsible for various aspects of the management of its VLE. The VLE constitutes a user-friendly and comprehensive system, with an in-built user guide, access to information on College policies and procedures, information on programmes, modules and assessment. Lecturers are required to post lecture material and any supporting documentation. The College is also building up an electronic library of e-books accessible from the VLE.

3.10 In reviewing the documentation submitted by the College, the review team noted the absence of any internal code of practice or quality handbook for the management of quality and standards that sets out how the various procedures and processes operate. Senior staff acknowledged this to be an omission and expressed an intention to address it. Staff accepted that there was not a single repository of documentation describing quality assurance processes, although new staff claimed to be able to obtain necessary information through easy contact with more experienced staff, facilitated by the small size of the College. With a view to ensuring effective and consistent implementation of processes, the review team **recommends** that the College develop and maintain a source of reference that details College-wide policies and procedures for the management of quality and standards.

3.11 The information provided about the College and its programmes is not fit for purpose as it does not consistently enable its intended audiences to form reliable views about its provision. The review team concludes therefore that Expectation C is not met. Shortcomings in the provision of information indicate weaknesses in the operation of the College's governance structure and lack of clarity about its responsibilities. The level of risk is therefore moderate.

Expectation: Not met Level of risk: Moderate

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

3.12 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is not met and the associated level of risk is moderate.

3.13 Although the College has a policy for managing its public information, and provides clear and accessible information in the form of prospectuses and handbooks, its website suffers from missing information and inoperative links. The College does not have a single source of reference for its policies relating to the management of quality and standards. These shortcomings are indicative of weaknesses in the operation of the College's governance structure as it relates to quality assurance, and a lack of clarity about responsibilities, which, without remedial action, could lead to serious problems over time with the management of this area.

3.14 There are no findings of good practice or affirmations relating to this judgement area.

3.15 There are two recommendations in this judgement area. The first relates to the provision of a single source of reference for policies relating to the management of quality and standards. The second concerns the establishment of processes to ensure the effective operation of the College's website to ensure that information is fit for purpose.

3.16 The review team concludes that the quality of the information about learning opportunities at the College **requires improvement to meet** 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's Strategic Plan focuses on the delivery of programmes that prepare students for employment in professional careers. Strategic objectives include: developing the IT infrastructure and a VLE to facilitate learning opportunities; developing a strong team of teaching staff; strengthening student representation and the student voice; and continued implementation of the Quality Code. The Principal oversees the academic standards and quality of provision, assisted by the Academic Quality Adviser, in relation to enhancing student learning opportunities. SMT, Academic Board (ASQA) and the Teachers' Committee provide a coherent structure to manage student's learning opportunities.

4.2 The College has strategic leadership, a committee structure, and quality assurance processes to provide a framework for identifying opportunities for enhancement. The processes include standards verification by the awarding organisation, the annual review and monitoring of programme delivery, student engagement in quality assurance, and peer review and appraisal of staff. The quality assurance framework has the capacity to enable the Expectation to be met.

4.3 The review team evaluated the effectiveness of the strategies and procedures by examining the Strategic Plan, Teaching and Learning Strategy, committees' terms of reference and minutes, annual monitoring report and action plan, and student feedback. The team also held meetings with the Principal, senior staff, teaching staff and former students.

4.4 The College's processes are not effective in identifying and sharing good practice and thereby providing opportunities for enhancement of student learning. Committees' terms of reference do not make clear where responsibility for enhancement lies in the governance structure; such responsibility rests primarily with individuals. The College has annual monitoring procedures but there is no evidence that ASQA makes use of these procedures for the identification and dissemination of good practice. The Teaching and Learning Strategy indicates that good practice identified in lesson observations will be disseminated to enhance learning and teaching. Although teaching staff regarded observations as a useful developmental process, there is no formal process for sharing good practice.

4.5 The College is taking deliberate steps to develop learning resources, including IT resources and a VLE. There is awareness of the importance of digital literacy, and plans to equip students with adequate digital skills to meet job requirements. Teaching staff are embedding digital skills in classroom activities and assessments.

4.6 As well as development of the VLE, there are a number of activities in place that benefit the student learning experience. Staff gave examples of the use of IT to empower students: the provision of learning plans to students, guest speakers, and day trips to external organisations as enhancement activities. However, these improvements to the student learning experience are at operational rather than strategic level. The review team therefore **recommends** that the College develop, implement and promulgate a policy for strategic enhancement of learning opportunities, including structures and processes for identification and dissemination of good practice.

4.7 The College is currently revising policies, and aims for continual improvement that will be assisted by student feedback and staff experience. However, the College does not

have a strategic approach to enhancement, and, therefore, the promotion of an ethos of enhancement of student learning opportunities is lacking among its staff.

4.8 Although the College has identified activities that will benefit the student learning experience, there is no evidence that deliberate steps are being taken at College level to improve the quality of students' learning opportunities. This lack constitutes a significant gap in the College's policy and procedures. The review team concludes therefore that the Expectation is not met and the associated level of risk is serious.

Expectation: Not met Level of risk: Serious

#### The enhancement of student learning opportunities: Summary of findings

4.9 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation in this judgement area is not met, with an associated level of risk which is serious.

4.10 There are no findings of good practice or affirmations relating to this judgement area.

4.11 The College does not have a strategy for achieving a consistent and effective approach to the enhancement of its provision. Its failure to form an effective enhancement strategy at institutional level led to the single recommendation that it should take deliberate steps at College level to improve the quality of students' learning opportunities, including structures and processes for identification and dissemination of good practice. This recommendation is indicative of a weakness in the operation of the College's governance structure and of insufficient emphasis given to assuring quality in its planning processes.

4.12 The College has not planned significant action to address this weakness, and has shown only limited understanding of its responsibilities in respect of the enhancement of learning opportunities. The review team concludes that the enhancement of student learning opportunities at the College **does not meet** UK expectations.

#### 5 Commentary on the Theme: Digital Literacy

#### Findings

5.1 The College's focus with regard to digital literacy is related to equipping students with adequate digital skills to meet job requirements and be employment-ready. The College is at pains to note that the approach taken is much wider than just upskilling information technology. It links this directly to employability and further divides consideration into two areas: increasing the awareness of the importance of digital skills in the job market and to professional development; and enhancing digital skills by embedding them in the curriculum.

5.2 On the former, sessions are set up to make students aware of various aspects of the analysis and management of data and information. The College plans to hold a session for every class in each term to increase awareness of the requirements of digital skills in the employment market.

5.3 On the latter, staff are encouraged to include digital skills requirements as part of their lesson plans. Lesson plans include activities requiring digital skills. Formative assessments will include an element of digital skills relevant to the task, and provide an opportunity for feedback to the student on how to improve these skills. These assessments are supported by 'laboratory' sessions. Where possible, summative assessments are designed to exploit digital skills and will be considered, subject to approval by the Standardisation Committee.

#### Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 22-25 of the Higher Education Review (Alternative Providers) handbook.

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

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

#### Academic standards

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

#### Award

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

#### **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.

#### Public information

Information that is freely available to the public (sometimes referred to as being 'in the public domain').

#### **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.

#### Subject Benchmark Statement

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

#### Technology enhanced or enabled learning (or e-learning)

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

#### Threshold academic standard

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

#### Virtual learning environment (VLE)

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

#### Widening participation

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

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