

Higher Education Review (Alternative Providers) of Mont Rose College of Management and Sciences Ltd

October 2017

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About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at the Mont Rose College of Management and Sciences Ltd. The review took place from 24 to 26 October 2017 and was conducted by a team of three reviewers, as follows:

- Miss Sarah Bennett (student reviewer)
- Dr Libby Pearson
- Mr Colin Stanfield.

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

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

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

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

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

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

²QAA website: www.gaa.ac.uk.

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

Key findings

Judgements

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

- The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations **meets** UK expectations.
- The quality of student learning opportunities **meets** UK expectations.
- The quality of the information about learning opportunities is meets UK expectations.
- The enhancement of student learning opportunities is commended.

Good practice

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

- The comprehensive support for staff development and engagement through a wide range of activities which ensures the ongoing enhancement of the quality of learning and teaching (Expectation B3 and Enhancement).
- The holistic approach to support a culture of continuous improvement in the sharing of best practice across teaching teams (Expectation B3 and Enhancement).
- The academic review journal which contributes to a culture of continuous improvement in raising the academic development of both staff and students (Expectation B3 and Enhancement).
- The development of employability skills that makes a significantly positive contribution to student's personal professional and academic development (Expectation B4 and Enhancement).
- The extensive mechanisms in place that involve students at all levels as partners in the enhancement of their educational experience (Expectation B5 and Enhancement).
- The strategic and innovative processes which enable students' progression and enhance their academic skills and subject knowledge (Enhancement).

Recommendations

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

By March 2018:

 ensure access to formal admissions, appeals and complaints policy for prospective students (Expectations B2, B9 and Information).

Financial sustainability, management and governance

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

About the provider

Mont Rose College of Management and Sciences Ltd (the College) established in 2006, is a further and higher education college based in Ilford, Essex. The College's vision is to encourage self-motivated reasoning, plus independent and creative thinking to engage students in acquiring the vital ability to "learn how to learn". The College also has six aims which include to provide and deliver high quality education, learning and assessment across the whole college and to provide relevant and supportive opportunities to students.

The College delivers Higher National Diplomas in a number of areas including business marketing and hospitality management. They also offer a Diploma in Education and Training. These programmes are delivered on behalf of Pearson, the awarding organisation, with whom the College has had relationship with since June 2012. The College also delivers full and top-up degrees in accounting and finance, business management and international hospitality management. These awards are delivered on behalf of Buckinghamshire New University, the awarding body. At the time of the review, the College had 950 students all of which are full-time. There are 21 academic staff employed by the College to deliver its higher education provision, 14 of which are full-time.

The College delivers from two sites, both in Ilford. In 2017 the College occupied a newly refurbished campus building, which includes lecture rooms and computer laboratories.

The College states that its main challenge is competition from other higher education providers in the local area and the College aims to mitigate this and maintain its position by developing relevant and demand-led provision with its awarding body and organisation.

The College's last QAA review was held in October 2013 and it was for educational oversight of its higher education provision. The positive outcome of the review included a number of recommendations which the College responded to by developing a new systematic approach to annual monitoring and developing systems for sharing good practice. The College engaged with QAA's annual monitoring process three times since its review and received a commendable outcome in 2014.

Explanation of findings

This section explains the review findings in greater detail.

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

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

- a) ensure that the requirements of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) are met by:
- positioning their qualifications at the appropriate level of the relevant framework for higher education qualifications
- ensuring that programme learning outcomes align with the relevant qualification descriptor in the relevant framework for higher education qualifications
- naming qualifications in accordance with the titling conventions specified in the frameworks for higher education qualifications
- awarding qualifications to mark the achievement of positively defined programme learning outcomes
- b) consider and take account of QAA's guidance on qualification characteristics
- c) where they award UK credit, assign credit values and design programmes that align with the specifications of the relevant national credit framework
- d) consider and take account of relevant Subject Benchmark Statements.

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

- 1.1 The College currently delivers Higher National Diploma courses for its awarding organisation in: Business Marketing; Hospitality Management; Accounting and Finance; Health and Social Care as well as a Level 5 Diploma in Education and Training (DET). The College also delivers a series of Level 6 programmes on behalf of its awarding body, at undergraduate degree level: BSC (Hons) Accounting and Finance; BA (Hons) Business Management; BSc(Hons) Accounting and Finance (L6 entry Top-Up); BA (Hons) International Hospitality Management (L6 entry Top-Up) and BA (Hons) Business Management (L6 entry Top-up).
- 1.2 As the College does not have degree awarding powers, the responsibilities for determining award levels and outcomes lies with the relevant awarding body and organisation. The College maps and benchmarks each award against the awarding body and organisation descriptors. The setting of standards for the Higher National programmes is primarily the responsibility of the College with the approval of the awarding organisation. The latter determines that the requirements of the credit framework, Subject Benchmark

Statements and any Professional, Statutory and Regulatory Bodies are met. Also for these programmes, the College is jointly responsible for programme development and the production of definitive programme information.

- 1.3 For the setting of standards for the degree programmes, the College relies on the awarding body to ensure that aspects of Expectation A1, including alignment with the FHEQ, are adhered to. Similarly, the College uses the awarding body's programme specifications for the Level 6 programmes it offers and all assessments are set by the awarding body.
- 1.4 The College has appropriate internal processes to follow and adhere to its delegated responsibilities of its awarding body and organisation which would enable the Expectation to be met.
- 1.5 The review team accessed programme specifications, committee meeting minutes, programme team meetings, FHEQ mapping, Subject Benchmark Statement mapping and validation reports, and external examiner reports with respect to Expectation A1. The review team met staff and students and confirmed that all matters pertaining to the setting and maintenance of standards are managed effectively in the partnership arrangements which ensures that requirements are met.
- 1.6 The review, monitoring and approval of higher education programmes is the responsibility of both the College and its partner organisations, the responsibilities for which are detailed in the individual partnership agreements. The College is committed to making every effort to maintain academic standards, and staff regularly attend the Academic and Quality Assurance Board where academic and quality issues are regularly discussed. The College's teaching and senior staff have good working relationships with the awarding body's liaison tutors.
- 1.7 At an institutional level, the College also considers comments made by external examiners regarding academic standards and the use of external reference points. Issues are discussed at the Academic and Quality Assurance Board and escalated to the Senior Staff Committee Meeting.
- 1.8 The College has well developed processes for the revisions to programmes and staff showed an awareness of their and the Colleges responsibilities in these areas. These processes are robust and align with the requirements of the awarding body and organisation. They lead to sound decision making which ensures that new and existing programmes meet the UK threshold standard for the qualification. The review team concludes that the Expectation is met and the associated level of risk is 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

- 1.9 The partnership agreements with the College's awarding body and organisation, requires the College to work within the academic frameworks provided by each respective partner's academic regulations.
- 1.10 The College sets out its governance arrangements in a series of governance documents, broadly containing the values, objectives, structures and arrangements for the strategic direction of the College, including the commitment to meet the expectations of the Quality Code. A Quality Assurance Policy sets out details of the approach to quality assurance and the principles underpinning the approach.
- 1.11 In testing the Expectation, the review team scrutinised a range of College, awarding body and organisation documentation including the Mont Rose College Quality Assurance Policy and Board of Governors roles and responsibilities as well as committee and board minutes. The review team met with senior and teaching staff and students and reviewed the information about academic and assessment regulations on the virtual leaning environment (VLE) and in student and VLE handbooks
- 1.12 The College Academic Manager is encouraged to attend the appropriate committees at the awarding body and there are clear lines of communication between the awarding body and College academic governance structures.
- 1.13 The Academic and Quality Assurance Board, chaired by the Principal, is the higher education quality assurance body for the College. Individual programme and course team meeting minutes and external examiner's reports are considered at this committee. The terms of reference for this Committee are set out in the College's Quality Assurance Policy.
- 1.14 External examiners reports confirm that students are meeting the standards expected and the correct FHEQ level.
- 1.15 The College's governance structure supports the maintenance of academic standards as specified by the College in agreement with the awarding body and the organisation and College staff have an understanding of their responsibilities within these agreements. The review team concludes that the Expectation is met and the associated level of risk is low.

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

- 1.16 The production of definitive awarding body programme information such as specifications is the responsibility of the body and is outlined within the responsibilities documentation and operating agreement. In addition, the awarding organisation has delegated responsibility to the College to maintain definitive records of each programme. Definitive information regarding programme specifications, aims, expected achievements and intended learning outcomes are available on the College website and on the website of the awarding body. Programme specifications make clear reference to the FHEQ and evidence of mapping to Subject Benchmark Statements.
- 1.17 These measures would enable the Expectation to be met, as conclusive records of each programme are provided to students.
- 1.18 In testing the Expectation, the review team examined records relating to individual programmes and qualifications, including programme specifications, assessment descriptors and cooperative agreements relating to the College and partner associations. The review team also met with relevant academic staff and students.
- 1.19 Programme handbooks provided for the Higher National and degree courses detail to students which awarding body or awarding organisation that grants their qualification, the methods used in assessments, and the criteria they are assessed against. These processes allow the College to maintain accurate, precise records of the programmes they deliver. The review team found that students were aware of learning outcomes for their course, and how to locate this information. Staff confirmed that data relating to course progression and pass rates was examined regularly, and reviewed at Academic Board. Records of study were provided to students on completion of their course, including a covering letter as proof of College attendance.
- 1.20 The College maintains definitive records of programmes it offers to students, including programme changes and effectively discharges its responsibilities around definitive programmes in line with its awarding body and organisation's requirements. Therefore the review team concludes that the Expectation is met and the associated level of risk is 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

- 1.21 The qualifications, programmes, modules and units that the College delivers are set by its awarding body and organisation. Documentation outlining the College's and partner responsibilities show that the awarding body has responsibility for programme approval, but that for awarding organisation provision this is a shared responsibility with the College. Senior staff at the College are alert to the local and national higher education sector and business environments and on the basis of their awareness bring forward proposals for strategic developments at the College. In determining whether or not to seek approval to deliver degree and Higher National programmes the College undertakes risk assessment of such strategic developments and develops an annual Risk Management Strategy which is approved by the Audit, Finance and Operations Committee. New programmes are developed and proposed through internal programme approval procedures through the Academic and Quality Assurance Board, which re-approves all the programmes after five years of delivery. Once programmes have been approved internally at the College, University programmes are then subject to the awarding body's approval process.
- 1.22 The College has in place processes to determine which programmes it is best placed to seek to deliver and then internally tests these programmes through an approval process. These processes would allow this Expectation to be met.
- 1.23 The review team tested this Expectation by reviewing the College self-evaluation document, considering the respective responsibilities documentation for the awarding body and organisation and in meetings with College staff and representatives from the awarding body. The review team also considered evidence of the College strategic risk assessment and internal course approval processes and documents from the awarding body and organisation confirming the College's approval to deliver agreed programmes.
- 1.24 The College has a history of successful programme approvals and works effectively with its awarding body and organisation to identify programmes for which it wishes to seek approval having taken the strategic decision to do so. The Academic Manager, working through the Academic Board, is responsible for ensuring that courses offered at the College prove to be a valuable educational experience for the students, fulfil both the academic requirements and employment needs of the students and support the overall objectives of the College and the programme. The College's internal course approval template requires that a sound business and educational case, which includes academic merit, labour market information, risk assessments and the teaching and learning strategy, is established by academic managers, which are put to the College Academic and Quality Assurance Board. These processes apply to both wholly new programmes and those due for re-approval after five years of delivery. Evidence seen and heard by the review team confirmed that the cases made were thorough, robust and aligned with Subject Benchmark Statements and the Quality Code. The College Academic and Quality Assurance Board is responsible for the final approval or re-approval of all programmes.
- 1.25 The College has well developed processes for the approval and re-approval of programmes. These processes are robust and align with the requirements of the awarding

body and organisation. They lead to sound decision making which ensures that new and existing programmes meet the UK threshold standard for the qualification. The review team concludes that the Expectation is met with a low level of associated risk.

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

- 1.26 The qualifications, programmes, modules and units that the College delivers are set by the partner awarding body and organisation. These are aligned with the FHEQ and are cognisant of relevant subject and qualification benchmarks. Consequently the College uses the credit system set by the relevant awarding body or organisation. Through its internal programme approval process the College seeks to ensure that it is able to deliver programmes which meet the academic standards and credit requirements as set out in the programme definitive documentation. For university programmes, the College receives qualification, programme and module definitive documentation from the awarding body for the awards that it is approved to deliver. This includes the assessment strategies, which the College then adopts in its delivery.
- 1.27 The awarding body take responsibility for final assessment decisions which are agreed at the awarding body's Assessment Boards. For its Higher National programmes, the College has the responsibility to develop assessment strategies which allow students to evidence that they have met the intended learning outcomes of the awarding organisation specified units. The College holds formal assessment boards for both its university and Higher National provision. In the case of the former, assessment grades are then confirmed at the awarding body Assessment Boards. In the case of the latter, grades are submitted to the awarding organisation and the provision is subject to Standards Verifier monitoring. The College has a Lead Verifier who has oversight of assessment for Higher National programmes and liaises with the Standards Verifier in this regard.
- 1.28 The College has in place approval, review and assessment policies and procedures which ensure that its delivery of programmes and their associated assessments enable students to evidence that they have or have not met the specified intended learning outcomes of the programme. These would enable the Expectation to be met.
- 1.29 The review team tested this Expectation by reviewing the College self-evaluation document, considered the respective responsibilities documentation for the awarding body and organisation and in meetings with College staff and representatives from the awarding body. The review team also considered the College's Assessment and Marking Policy and minutes from College Assessment Boards.
- 1.30 The College Quality Assurance Manager and additionally, in the case of Higher National programmes, the Lead Verifier, has the responsibility to ensure that assessments are fit for purpose and that assessment verification planning, production and recording takes place, including a review of Assessor Practice. They are also responsible for Internal Verification and Moderation processes and for responding to external examiners' reports. The College Assessment and Marking Policy is developed according to the regulations of the awarding body and organisation and enables the College to ensure that assessment and the subsequent award of credit is effective. The policy includes arrangements for the

verification and moderation of assessments.

- 1.31 The College holds internal Assessment Boards at which module or unit and qualification decisions are confirmed. For university programmes, assessment grades are subsequently confirmed at university Assessment Boards. For Higher National programmes, grades are submitted to the awarding organisation and the provision is subject to Standards Verifier monitoring. The College has a Lead Verifier who has oversight of assessment for Higher National programmes and liaises with the Standards Verifier in this regard. The College policy requires that all programmes are subject to annual monitoring and review and to an internal re-approval process after five years of delivery. Academic managers are required to submit both a business and academic case for the programme, which is then considered by the Academic and Quality Assurance Board.
- 1.32 The College has well developed processes for the approval, review and re-approval of its programmes. These processes align with the requirements of the awarding body and organisation and ensure that for all programmes achievement of relevant learning outcomes is demonstrated through assessment and that academic standards are maintained. The review team concludes that this Expectation is met with an associated low level of risk.

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

- 1.33 The College has the responsibility for the annual monitoring and review of awarding organisation programmes, while this is a shared responsibility for the awarding body's programmes. The Colleges general approach to annual monitoring is set out in its Annual Monitoring and Programme Review Executive Summary.
- 1.34 The Academic and Quality Assurance Board is the final academic authority of the College. The Board is responsible for annual monitoring of all programmes and periodic review of programmes every five years. The College Academic Manager has strategic oversight of annual monitoring and review. The College Quality Assurance Policy requires all programmes to undertake annual programme review and the College has developed an annual system of programme monitoring based on a template aligned with the Quality Code. The template uses both internal inputs and those of the awarding body and organisation. Annual monitoring review results in the development of an action plan to address areas for development and build on strengths. Programme level annual monitoring reports and their associated action plans are reported to the College Academic and Quality Assurance Board.
- 1.35 For university programmes, the College participates in the university's Annual Review and Evaluation procedure submitting an Academic Partner Programme and Achievement Report and Action Plan after the end of the first year of offering the University's Top-up degree.
- 1.36 The College has in place general principles, policies and procedures for annual and periodic programme monitoring and review which would allow this Expectation to be met.
- 1.37 The review team tested this Expectation by reviewing the College self-evaluation document, considering the respective responsibilities documentation for the awarding body and organisation and in meetings with College staff and representatives from the awarding body. The review team also considered the College's Annual Monitoring and Programme Review Executive Summary, the Quality Assurance Policy and annual monitoring template, along with the university's Academic Partner Programme and Achievement Report and Action Plan. The review team also considered a sample of annual monitoring reports and reviewed minutes from the Academic and Quality Assurance Board
- 1.38 Annual monitoring entails a consideration of data relating to retention, progression and achievement, student feedback, external examiner and standards verifier reports and best practice. The College makes good use of data in this respect. The process also takes into account academic staff feedback and peer observations. An action plan is developed for implementation in the subsequent academic year. For its awarding body provision the College is required to submit an annual monitoring report to the awarding body. The review team found and heard evidence that annual monitoring is reported up through the College's deliberative committee structure with the College Academic and Quality Board having final oversight of reports and using these to inform College practice and to report outwards, for example, to its awarding body.

- 1.39 Annual Monitoring Reports that the review team considered contained action plans. While there were some inconsistencies in the rigour of these plans, they did identify actions to be taken and, where applicable, follow up on actions from the previous year. They also identify opportunities to build on good practice. Action planning is overseen by the Academic Manager through the Academic and Quality Assurance Board.
- 1.40 The College has in place policies and procedures which ensure that annual monitoring takes place on a planned basis and is used to inform its awarding body and organisation. Action plans for addressing areas for development and building on strengths are in place. The review team concludes the Expectation is met with an associated low level of risk.

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

- 1.41 The College in addressing the currency and relevancy of the curriculum, seeks to make use of external and independent industry and academic expertise in the maintaining of academic standards. The Quality Assurance handbook notes that the College makes use of external reference points and external benchmarks, such as the FHEQ, to inform the courses and programmes offered by the College, on behalf of its awarding body and organisation. The Handbook also references the use of local employers and industry specialists.
- 1.42 Both the Academic and Quality Assurance Board and the Senior Staff Committee are responsible for the maintenance of academic standards, and the management of quality and day-to-day learning opportunities for students. The responsibility for engaging external and independent expertise at Level 6 largely rests with the awarding body for the degree programmes. The awarding body undertakes external examination in the form of standards verification to check that College assessment decisions meet national standards. The College holds this responsibility for the Higher National programmes.
- 1.43 The arrangements in place at the College for the use of external and independent expertise in maintaining academic standards would enable the Expectation to be met.
- 1.44 The review team met course and programme leaders, a representative from the awarding body, teaching staff and students. The team also scrutinised documentation including reports from validations, external examiners and annual monitoring reviews.
- 1.45 A suitable external examiner is appointed for each programme in line with the requirements of the awarding body and organisation under the contractual obligations. External examiner reports are reviewed by the Academic Quality Assurance Committee and disseminated to staff and students. The Academic Manager formally responds to the external examiner reports and the reports are used by the College to inform current delivery and design of new programmes. The content of the reports are also reflected upon during the College's annual monitoring process and used to inform any enhancement to the current provision, new provision and sharing of good practice among the staff contingent.
- 1.46 The review team found that the College uses external advisers as well as external examiners in programme design and monitoring to maintain threshold standards. Staff were able to provide coherent discourse on how the College draws on external expertise at various stages of the programme lifecycle and in terms of the awarding body and organisation, where the responsibility lies in these key processes.
- 1.47 The College has arrangements in place to enable the effective use of external expertise across the College's higher education provision in the maintenance of academic standards. The review team concludes that the Expectation is met and the associated risk is low.

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

- 1.48 In reaching its judgement about the maintenance of the academic standards of awards, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.
- 1.49 All of the applicable Expectations in this area have been met and the risk is judged low in each case. There are no features of good practice or recommendations identified in this area.
- 1.50 The review team concludes that the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and awarding organisations at the provider **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 does not set academic standards but has the responsibility to maintain those standards set by its awarding body and organisation. It is, however, responsible for the quality of learning opportunities that it provides. The qualifications, programmes, modules or units that the College delivers are set by its awarding body and organisation. Documentation detailing the responsibilities between the College and its awarding partners show that the awarding body has responsibility for programme approval but for the awarding organisation provision it is a shared responsibility.
- 2.2 In determining whether or not to seek approval to deliver degree and Higher National programmes, the College undertakes risk assessment of such strategic developments and develops an annual Risk Management Strategy which is approved by the Audit, Finance and Operations Committee. This is to assure itself that it is well placed to provide the quality of learning opportunities for which it is responsible.
- 2.3 New programmes are developed and proposed through Internal Programme approval procedures and reported to the Academic and Quality Assurance Board, which re-approves all the programmes after five years of delivery. For university programmes, courses are subject to the approval processes of the awarding body once they have been approved by the College.
- 2.4 The College has in place policies and procedures for programme approval which allow the College to determine which programmes it is best placed to seek to deliver and then to internally test these programmes through an approval process. As such, what is in place would allow this Expectation to be met.
- 2.5 The review team tested this Expectation by reviewing the College self-evaluation document, considering the respective responsibilities checklist for the awarding body organisation and in meetings with College staff and representatives from the awarding body. The review team also considered evidence of the College strategic risk assessment and internal course approval processes along with documents from the awarding body and organisation confirming the College's approval to deliver agreed programmes.
- 2.6 The College works effectively with its awarding body and organisation to identify programmes for which it wishes to seek approval having taken the strategic decision to do so. The Academic Manager is responsible to ensure that courses offered at the College prove to be a valuable educational experience for the students, fulfil both the academic requirements and employment needs of the students and support the overall objectives of the College and the programme.
- 2.7 The College's internal course approval process, based on a standard template, requires that a sound business and educational case, which includes academic merits, market information, risk assessments and teaching and learning strategy, is established by academic managers, which are put to the College Academic and Quality Assurance Board.

It is this Board which has the ultimate responsibility for course approval at the College, though for university programmes, the awarding body approval processes are followed once a programme has been approved by the College.

- 2.8 These processes apply to both wholly new programmes and those due for re-approval after five years of delivery. The review team found that the cases made were thorough, robust and aligned with Subject Benchmark Statements and the Quality Code. Proposals are informed by the College's student feedback processes and by external academic and industry input. A number of College staff have current or recent sector experience, experience which is used to inform curriculum development.
- 2.9 The College is in the early stages of curriculum development for a BA (Hons) Hospitality, working in partnership with academic staff at its existing awarding body. This development will for the first time see College staff proposing, developing and taking to approval, new modules and their associated teaching, learning and assessment strategies.
- 2.10 The College has well developed processes for the approval and re-approval of programmes. These processes are robust and align with the requirements of the awarding body and organisation. They lead to sound decision making which ensures that new and existing programmes meet the UK threshold standard for the qualification. The review team concludes that the Expectation is met with a low level of associated risk.

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

- 2.11 The College Admissions Policy ensures that all applicants are considered on an individual basis and regarded in accordance with the College's Equality and Diversity Policy. The College regularly reviews the Admissions Policy to ensure that its mission and strategic objectives remain supported. The Admissions Policy was discussed and mapped to Chapter B2 of the Quality Code and approved by the Academic Board on 5 January 2017.
- 2.12 The orderly delegation of admission responsibility and provision of admissions processes, standardised documentation and tests would allow the Expectation to be met.
- 2.13 The review team tested this Expectation by examining policies and procedures to recruit learners by accessing the College website, reading the College Admissions Policy, Recognition of Prior Learning (RPL) policy and meeting minutes. The review team also discussed admissions guidelines with students and staff.
- 2.14 The College website provides clear information regarding the entry criteria, tuition fees, tuition fee loans, study hours, entry requirements, teaching methods and modules. There is also information for students with additional learning needs or a disability, allowing prospective students to make an informed decision about higher education. The College regularly holds events and activities for prospective students at local institutes, informing them of the options offered by the College.
- 2.15 Students can apply to the College's Admissions Team directly using an online application form. Admissions staff routinely checks prospective applications to ensure that they meet the necessary entry criteria. Admissions staff are trained for their role in a range of QAA, HEFCE and UCAS training sessions.
- 2.16 All student registrations for awarding organisation provision are checked by the Principal and the Admissions team prior to being uploaded on the College's Management Information System. The students are registered online with the awarding organisation Pearson, then checked by the Academic Quality Manager. Students applying for university level courses offered by the College can apply through UCAS, these applications are managed by the awarding body.
- 2.17 Students whose first language is not English must have proof of English language, scoring a Common European Framework of Reference for Languages (CEFBR) of level B2 or above. After submitting their documentation, students are required to take an English and Maths diagnostic test at CEFR level B2. The test changes every year and is written and marked by CELTA teachers. They must score more than fifty percent to progress to the interview stage.
- 2.18 Academic staff conduct face-to-face interviews with prospective students on the same day as their diagnostic test. Applicants who do not meet the entry requirements may be considered by the Principal or the College Admissions Manager, and may be offered a place subject to conditions.

- 2.19 Admissions decisions are conveyed to prospective students in either an acceptance or rejection letter within a week of interview. While the admissions policy states that students can appeal or complain regarding admissions using the Complaints and Appeals policies on the College's website, these policies are not available to students until after induction. In addition, the College acceptance and rejection letters do not make any reference to student's right to appeal or complain during the admissions process. Although unsuccessful applicants may request and obtain informal feedback from admissions staff, the College has no formal policy in place to allow an appeal against an admissions decision. Therefore, the review team **recommends** that the College implement access to formal admissions, appeals and complaints policy for prospective students.
- 2.20 The College informs prospective students of any changes in the programme they have applied for using a range of methods, including letters, messages, social media and email notifications to prospective students regarding any modifications. The Senior Management Team (SMT) considers a recruitment and admissions report annually.
- 2.21 Student induction to the College includes a tour of the premises, detailed course information and a presentation regarding VLE systems. Students' academic attainment is closely monitored by assessment teams during the first few weeks of teaching and can be referred for diagnostic evaluation if required. For university programmes, induction is conducted by university representatives who visit the College to discuss services with students. Students on awarding body programmes were aware that they could contact it with queries at any time.
- 2.22 The College has a robust series of recruitment and admissions processes that adhere to the principles of fair admission. While the College still needs complaints and appeals information to be accessible for prospective students this represents a low level of risk, and processes and procedures to admit students are thorough, accessible and reliable. Therefore, the Expectation is met, and the associated level of risk is 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

- 2.23 The College's Strategic Plan 2017-2018, which articulates the commitment to staff development and enhancing the student experience, is supported by the Learning and Teaching Strategy. The priorities of the Strategy are aligned to the Quality Code and include providing an inclusive, creative and transformational learning experience through inspirational teaching. The Strategy provides a statement on quality assurance and statements of intent for student and staff development. There are statements of commitment on the physical, virtual, and social resources contained within the Strategy.
- 2.24 The College acknowledges that effective teaching and support for learning occurs when staff display a sound understanding and up-to-date knowledge of their subject and/or professional practice and requires that all new teaching staff have experience of teaching and a mentor is appointed from the established teaching staff body. The procedure for the appointment of new teaching staff requires that prior to being offered a position they undertake an academic presentation to a panel of teaching staff and students.
- 2.25 The College's Teaching and Learning Strategy together with its supporting processes and approach to teaching and staff development would enable the Expectation to be met.
- 2.26 The review team tested the Expectation through a series of meetings with staff at all levels and students as well as considering documentation including the staff development policy and evidence of implementation, an academic journal, and reports on the sharing of good practice.
- 2.27 The College offers a Staff Induction and Mentoring policy that outlines the College expectations of the staff, mentees and mentors and the support that the College will provide to new staff including mentoring and mentor selection. Mentors are selected by the Academic and Quality Assurance Board to support new staff in developing their skills through motivation and goal setting. The Academic Manager provides a mentoring report to the Academic and Quality Assurance Board which includes mentee and mentor feedback for the sharing of best practice. The College keeps a staff training record for each member of staff. The policy sets out the procedures to provide ongoing support through its staff development and continuing professional development as well as dispute management procedures in the unlikely event of a dispute arising. The awarding body conducts induction and training workshops for College staff who deliver the Level 6 programmes.
- 2.28 The College provides a clearly defined Teaching Staff Protocols document that outlines the College responsibilities and what is expected of teaching staff and their responsibilities including: Classroom; assessment; course management; tutorial sessions; student discipline. It is compulsory for teaching staff to attend the course team meetings unless permission has been granted for absence. A staff handbook provides further support for staff through the provision of information on MRC processes and procedures.
- 2.29 The College delivers a comprehensive suite of staff development opportunities in

the form of training and workshops and staff are encouraged to attend external CPD events that are relevant to their development and informs their teaching. Further, the College has made a commitment to sponsor all teaching staff in achieving fellowship of the Higher Education Academy as part of their personal and professional development. This is formalised through the Mont Rose College Staff Professional Development Policy. The Learning and Teaching Strategy also provides a clear and comprehensive statement enabling the College to actively encourage staff development and enable continuous enhancement of their progress and teaching performance. Teaching staff confirmed that they were familiar with both the Learning and Teaching Strategy and they described the implementation of a comprehensive staff development programme across the whole College and how learning, teaching and assessment are encouraged for discussion across teaching teams. Students confirmed on how the College draws on their input and feedback to enhance staff development at various stages of the programme lifecycle. The review team identifies the comprehensive support for staff development and engagement with a wide range of activities which ensures the ongoing enhancement of the quality of learning and teaching as good practice.

- The College invests in the sharing of good practice between teaching teams and among the wider College community. There is a well-established teaching and peer observation procedure in operation at the College and the review team found that students are encouraged to be active in the observation and feedback process. The College has developed a best practice sharing ethos across the College and the platform to share best practice is through the various committees, team meetings and all College staff meetings. A best practice report is created by the Academic Manager and shared at all of the College Boards and Committees to ensure dissemination. Academic staff are also involved in the admission process through the interview of prospective candidates and work with the College admission team to develop fair and equitable practice, share best practice and support candidature to programmes. The review team heard teaching staff actively lead on the sharing of best assessment practice both within their own teams and also across the wider College through 'The Bank' which is an open online resource facilitated by the College for the sharing of best practice. The review team also heard that the awarding body had taken the College best practice method and shared it across its own institution. Therefore, the holistic approach to support a culture of continuous improvement in the sharing of best practice across teaching teams has been identified as good practice.
- 2.31 Through the College's ongoing commitment to the academic development of its staff and students, the College embarked on and established a published Mont Rose College Academic Journal that has formal approval from the British Library. The journal is published biannually in hardback as well as publically on the College website. The Journal features publications created by College staff and students. The publications undergo rigorous peer assessment prior to publication and both students and staff who the review team met with noted involvement in the Journal had raised their academic aspirations and that they felt proud to be able to contribute in the cycle of continuous improvement. Therefore, the academic review journal which contributes to a culture of continuous improvement in raising the academic development of both staff and students is **good practice**.
- 2.32 The College has a strategic approach to the continuous enhancement and improvement of the learning and teaching environment which is valued by both staff and students. The College has a clear and comprehensive system in place to encourage extensive staff development and the sharing of best practice across the College and the review team identified three areas of good practice within this Expectation. The review team concludes the Expectation to be met and the associated level of risk is low.

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

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

- 2.33 The Strategic Plan, the Learning and Teaching Strategy and the Student Engagement Policy encompass the College's approach to supporting and enhancing student development and achievement. The recognition of the particular needs of the College student demographic along with the strategic approach by the Principal to attract and make provision for this type of student provides a diverse college culture. The College places high value on its diverse culture and support to the wider community through its emphasis on transformative learning.
- 2.34 The College adopts a variety of formal and informal arrangements to provide an array of support mechanisms and resources for student development and achievement. Implementation is monitored within established executive and deliberative committees, including the Board of Governors that focus on continuous improvement. Student participation is encouraged in all levels of the hierarchical structure and committees including involvement in any new developments, such as the new campus, analysis and debate of College produced reports, learning resources, employability events and student-led graduation activities.
- 2.35 The College's approach to supporting and enhancing student development and achievement through its Learning and Teaching Strategy, Student Engagement Policy and supporting practices would enable the Expectation to be met.
- 2.36 The review team tested the evidence by looking at student views expressed in the student submission, meeting with students and scrutiny of student feedback, committee minutes where students were present. The review team also met with academic and professional support staff.
- 2.37 A Student Services Department provides pastoral and welfare support to students. The Student Services Manager is the main source of information and advice for students, providing pastoral, welfare and careers advice and support. Information for students accessing this support is available from a number of sources, including a newly introduced Students' Union created from feedback of students, the Student Handbook, programme module handbook, and the VLE handbook. These are updated annually by the Student Services Department, available on the VLE and considered in the senior staff meetings.
- 2.38 The review team heard how senior staff meetings consider student feedback and any issues concerning the learning environment and student support. They also illustrate consideration of student participation in the recruitment of new teaching staff.
- 2.39 The approach to preparing students to operate successfully in the workplace is seen as a main strategic driver. The College makes deliberate efforts to support the onward careers and skills of its students and graduates by embedding employability in the curriculum, hosting multifarious career and employability promotional events including the sourcing of work placements for interested students, supporting conference and Trade event attendance. The College has also introduced an initiative called 'MRC Angels' an employability Business Plan competition, published schedules for external and industrial speakers and established dedicated mentors. The College places emphasis on the Work Placement Policy that outlines the responsibilities of the College, the learners and placement

providers and provides a Health and Safety Checklist that acts as due diligence prior to a placement being taken up. Students organised the latest graduation ceremony as part of a work based learning exercise, and were encouraged to take the lead by the College on all matters concerning the graduation with support where required from the staff. Students who attend or lead on College facilitated events are presented with a certificate aimed at supporting employability. Students with whom the review team met noted that they felt valued and encouraged by the opportunities made available to them by the College in particular through the development of employability skills. The College provided support to students to enable them attend events including 'Direct Gov' activities, a recent Council for Hospitality Management Education conference and job fairs. The development of employability skills makes a significantly positive contribution to student's personal professional and academic development is **good practice**.

- 2.40 Students confirmed satisfaction with the learning opportunities provided by the College and the support of students learning and needs. Students were also satisfied with the facilities and support available at both delivery sites including the access to a multi-faith room, IT and lecture facilities. Students noted that the induction was comprehensive and that they were provided with considerable information relevant to, and supportive of, their studies including the student, programme, and VLE handbooks, which all support their understanding at the start of their course. A personal tutoring system is available to students who are classed as poor performing. In terms of academic standards, students felt they were encouraged to take an active part in the strategic development of the college.
- 2.41 The College has in place an effective support framework and mechanisms which enables student development and achievement. These include appropriate and consistent facilities and resources for all delivery sites. The College's strategic and thorough approach to embedding employability skills throughout the students' experience has led to the identification of good practice in this area. The review team concludes that the Expectation is met and the associated level of risk is low.

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

Quality Code, Chapter B5: Student Engagement

- 2.42 The College has a variety of mechanisms and opportunities for students to give feedback regarding their educational experience. The Student Engagement Policy, has been designed to engage the whole student body in the College's quality review processes. Students have the opportunity to represent their fellow peers as Class Representatives and have allocated seats on the Academic and Quality Assurance Board, Board of Governors the Human Resources and Welfare Committee and the BA/BSc/Top-up Programme Committee. Class representatives and student engagement are monitored and overseen by the Student Services Manager and the Admissions Manager.
- 2.43 The processes currently in place for student representation enable students to engage both individually and collectively, allowing the Expectation to be met.
- 2.44 In testing this Expectation the review team considered information provided by the College in respect to student representation and class representatives. The review team discussed student engagement with academic staff, senior staff and students.
- 2.45 The Student Engagement Policy details student involvement in feedback, student representation and meeting participation. A Class Representative Handbook has also been developed to support class representatives in their role. Responsibilities of each class representative include attending training, actively seeking student opinions, letting students know the outcome of issues raised at meetings, and attending Class Representative Committee meetings. Class Representative training details the benefits and responsibilities of being a representative and the committees that students may attend.
- 2.46 The Class Representative Committee meets quarterly. Meeting minutes from the academic year 2015-16 and 2016-17 indicate that it is a platform for students to meet as a group and share their ideas, feedback and any grievances. Students who attend were enthusiastic regarding the positive responsibility they felt for their class. At the end of the academic year, class representatives receive an official certificate in recognition of their work for the College. The College hopes to expand the current representative system into a Students' Union.
- 2.47 There are additional opportunities for students to officially engage in the quality assurance of their programme. The Journal of Academic Reviews is a biannual educational periodical published by the College, where students are given the chance to act as co-authors with members of staff, in an effort to improve their academic writing and research skills. Students at review described gaining confidence after being asked to co-author articles with staff for the College academic journal. The journal has been identified as good practice in Expectation B3.
- 2.48 Students provide informal and formal termly feedback on teaching as part of the College's class observations, providing comment and suggestions about how the programme could be improved. Students also provided feedback about the new College buildings in a recent focus group. The results of student feedback are discussed in Academic and Quality Assurance Board meetings. External examiners reports are readily available to students on the College's VLE.
- 2.49 Students have been actively involved in the recruitment process for new teaching

staff. In this process students were invited to observe staff in a mock teaching session and to give feedback regarding potential candidates. Students at review provided several examples of where they had actively participated in College activities, including assisting staff with organising graduation celebrations, and in 'MRC Angels' a College employability and work placement initiative.

- 2.50 Students are provided with numerous opportunities to provide feedback to College staff and represent their fellow students. The College, wherever possible, tries to involve student participation in many areas of the management, consideration of delivery and the enhancement of provision. The review team found many examples of the pro-active approach the College takes with regards to student engagement and therefore the extensive mechanisms in place that involve students at all levels as partners in the enhancement of their educational experience is **good practice**.
- 2.51 The College takes considered steps to involve all students as partners. Students are aware of, and participate in, the wide range of opportunities available to them. These opportunities considered collectively provide an extensive and through approach to student engagement which has been identified as good practice. Therefore the review team concludes that the Expectation is met and the associated level of risk is low.

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

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

- 2.52 The qualifications, programmes, modules or units that the College delivers are set by the awarding body and organisation. These are aligned with the FHEQ and are cognisant of relevant subject and qualification benchmarks. Consequently the College uses the assessment and credit system set by relevant awarding body or organisation.
- 2.53 For the awarding body programmes, the College receives qualification, programme and module definitive documentation from the University for the awards that it is approved to deliver. This includes assessment strategies which the College adopts in its delivery. The awarding body take responsibility for final assessment decisions which are made by the awarding body's Assessment Boards. The awarding body also takes responsibility for setting and moderation or second marking of assessments.
- 2.54 For its Higher National programmes, the College has the responsibility to develop assessment strategies which allow students to evidence that they have met the intended learning outcomes of the awarding organisation specified units. Additionally, the College has responsibility for first marking of student assignments, moderation or second marking of assignments and for giving feedback to students on their assignments.
- 2.55 The College's general approach to assessment and marking is set out in its Assessment & Marking Policy, which is developed according to the regulations of the awarding body and awarding organisation. It has also developed an Assessment Malpractice Policy to address this particular aspect of academic standards.
- 2.56 The College holds formal assessment boards for both its awarding body and organisation provision. In the case of the former, assessment grades are then confirmed at the awarding body's Assessment Boards. In the case of the latter, grades are submitted to the awarding organisation and the provision is subject to Standards Verifier monitoring. The College has a Lead Verifier who has oversight of assessment for Higher National programmes and liaises with the Standards Verifier in this regard.
- 2.57 The College works closely with its awarding body and organisation and has in place a range of policies and procedures to ensure that all assessments are fit for purpose and that feedback on assessment is effective. It has well developed policies and procedures for confirming assessment and for reporting assessment outcomes to its awarding body and organisation. Consequently what is in place allows this Expectation to be met.
- 2.58 The review team tested this Expectation by reviewing the College self-evaluation document, the student submission and met with College staff and students. The review team also considered the documents pertaining to the responsibilities of the College in relation to its awarding body and organisation, the Assessment and Marking Policy and Assessment Malpractice Policy, sample assignment briefs, minutes from Programme Committees, Module Assessment Feedback, details of internal verification, the Report on Assessment Practice, the Internal Verifier Report, External Verifier Reports, Moderation documents, Assessment Board minutes and evidence related to staff induction and training in respect of

assessment.

- 2.59 The College sees assessment as playing a key role in the academic development of its students with a focus on assessment for learning at both the formative and summative stages of the assessment process. The College Quality Assurance Manager, working with the Lead Internal Verifier has the responsibility to ensure that assessment is fit for purpose, for assessment verification planning, that production and recording of assessment takes place, including a review of Assessor Practice and Internal Verification and Module delivery and for responding to external examiners' reports.
- 2.60 The College Assessment and Marking Policy is developed according to the regulations of the awarding body and organisation and enables the College to ensure that assessment and the subsequent award of credit is effective. The policy includes arrangements for the verification and moderation of assessments. College tutors are responsible for conducting assessments, which are later internally verified by the Lead Internal Verifier on the basis of the College Internal Verification Policy.
- 2.61 Staff are supported in their assessment practice through training events, for example in regard to feedback on assessment. College staff also liaise with staff from the University, with Pearson Standards Verifiers and with external examiners who are appointed by the awarding organisation and body respectively. Assignment briefs considered by the review team were detailed and clearly linked to intended learning outcomes with clear grading criteria, information on submission and assessment malpractice and with evidence of internal verification prior to the assessment being set for students.
- 2.62 Students submit their work through the College VLE where it is subject to analysis by plagiarism-detection software. The review team also saw evidence of structured verification and moderation of assessment decisions for Higher National programmes. For example, College processes had identified potential quality issues with particular assignments and an internal verifier had undertaken an investigation into the matter and reported on the case.
- 2.63 Higher National programmes are verified by Standards Verifiers appointed by the awarding organisation and internal verification is done by the Lead Internal Verifier appointed by the College to assure academic quality standards. The College holds internal Assessment Boards at which module or unit and qualification decisions are confirmed. Evidence from Standards Verifiers confirm that the College processes for the setting, delivery, feedback on and moderation of assessments are effective. The review team heard how new staff are supported in developing assessment and feedback skills. Students spoke positively about their experience with regard to assessment. They had a good understanding of related College policies and procedures. Students experience a wide range of assessment types and valued the feedback that they receive on assessment, feedback which they consider is valuable to help them develop their subject knowledge and assessment skills. They recognised that the College values assessment for learning as well as assessment of learning.
- 2.64 The College has the relevant policies and procedures in place to ensure that assessment is effective for both its Higher National and degree programmes. These mechanisms include internal verification and moderation of assessment decisions. External Standards Verifier reports and external examiner reports, confirm that College processes for the setting, delivery, feedback on and moderation of assessments are effective. Students were highly positive about their experience with regard to assessment. The review team concludes that this Expectation is met with an associated low level of risk.

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

Quality Code, Chapter B7: External Examining

Findings

- 2.65 The College follows the process of the awarding body for the appointment of external examiners and are appointed in line with the University's academic regulations. The process is set out in the partnership agreement. The College's annual Academic Partner and Achievement Report to the University also features external examiners comments.
- 2.66 The awarding organisation for the Higher National programmes also appoints the external examiners for their own programmes in line with their own procedures. It is the responsibility of the College to respond to external examiners reports and this responsibility lies with the College's Quality Assurance Manager.
- 2.67 The College's internal processes showing the consideration and use of external examiner input would allow the Expectation to be met.
- 2.68 The review team tested the Expectation by scrutinising a sample of external examiner reports, agendas and board and committee minutes, and meeting with College senior and academic staff as well as students.
- 2.69 External examiner reports are included in Annual Monitoring and published on the VLE for staff and students to view. Oversight of College responses to external examiner reports comes under the remit of the College Internal Verifier and Quality Assurance Manager who reports to the Academic and Quality Assurance Committee and the Senior Staff Committee. The College is fully compliant with the awarding body and organisations requirements to engage with the external examiner reports. The University forwards the reports to the College, where they are made available to staff by email and on the College's VLE. Academic staff provide general feedback from external examiners to students in the classroom. Students have access to external examiner reports through the College's online VLE platform. At institutional level, issues and themes arising from external examiner reports are referred to the Programme committees and the Academic and Quality Assurance Board. Where necessary, they are also reviewed at the Senior Staff meetings. The Quality Assurance Manager formally responds to external examiner recommendations.
- 2.70 College staff confirmed that they were involved in responding to external examiner reports through the annual monitoring of programme process. Students confirmed awareness of the external examining system with some students confirming meeting an external examiner during a visit to the College. Students also confirmed that they had sight and access to external examiner reports on the VLE platform.
- 2.71 The College has effective processes in place with which to consider and respond to external examiner input. Scrupulous use of external examiner reports are used to further develop and enhance its provision. The review team concludes that the Expectation is met and the associated level of risk is low.

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

Quality Code, Chapter B8: Programme Monitoring and Review

- 2.72 The College has the responsibility for the annual monitoring and review of awarding organisation programmes while this is a shared responsibility for university programmes. The College's general approach to annual monitoring is set out in its Annual Monitoring and Programme Review Executive Summary. The College Academic Manager has strategic oversight of annual monitoring and review, which is reported to the Academic and Quality Assurance Board, the final academic authority of the College. The Board is responsible for annual monitoring of all programmes and periodic review of programmes every five years.
- 2.73 The College Quality Assurance Policy requires all programmes to undertake annual programme review and the College has developed an annual system of programme monitoring based on a template aligned with the Quality Code. The template uses both internal inputs and those of the awarding body and organisation and this leads to an action plan for improvement in the subsequent year.
- 2.74 For awarding body programmes, the College participates in the university's Annual Review and Evaluation procedure submitting an Academic Partner Programme and Achievement Report and Action Plan after the end of the first year of offering the university's Top-up degree.
- 2.75 The College has in place general principles, policies and procedures for annual and periodic programme monitoring and review which would allow this Expectation to be met.
- 2.76 The review team tested this Expectation by reviewing the College self-evaluation document, considering the respective responsibilities documentation for the awarding body and organisation and in meetings with College staff and representatives from the awarding body. The review team also considered the College's Annual Monitoring and Programme Review Executive Summary, the Quality Assurance Policy and annual monitoring template along with the university's Academic Partner Programme and Achievement Report and Action Plan. The review team also considered a sample of Annual Monitoring Reports and reviewed minutes from the Academic and Quality Assurance Board.
- 2.77 Annual Monitoring entails a consideration of retention, progression and achievement, student feedback, external examiner and standards verifier reports and best practice. The College makes good use of data in this respect. The process also takes into account academic staff feedback and peer observations. The review team found and heard evidence that annual monitoring is reported up through the College's deliberative committee structure with the College Academic and Quality Assurance Board having final oversight of reports and using these to inform College practice and to report outwards, for example, to its awarding body.
- 2.78 Annual Monitoring reports that the review team considered, contained action plans to address areas for development. While there were some inconsistencies in the rigour of these plans, they did identify actions to be taken and, where applicable, follow up on actions from the previous year. They also identified opportunities to build on good practice. Action planning is overseen by the Academic Manager through the Academic and Quality Assurance Board.

2.79 The College has in place policies and procedures which ensure that annual monitoring takes place on a planned basis and is used to inform its awarding body and organisation. Action plans for addressing areas for development and building on strengths are in place. The review team concludes that the Expectation is met and the associated level of risk is 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

- 2.80 The College has fair complaints and appeals policies and procedures, which are accessible to staff and students on the College website. Both policies make clear the difference between an academic appeal and a complaint, with the complaints or appeals procedure signposted as an alternative.
- 2.81 The existence of these College policies would enable the Expectation to be met.
- 2.82 The review team tested this Expectation by examining a variety of documentation including the Student Complaints Policy and the Academic Appeals Policy and Procedures 2017-18. The review team also discussed the use of these policies and how they are made available with staff and students.
- 2.83 The College complaints policy clearly sets out opportunities for both formal and early informal resolution. Students have the right to be accompanied by a friend or colleague at every stage of the formal procedure and all actions are kept confidential. At the informal stage, students are encouraged to resolve the complaint by directly approaching the students involved, or by meeting with a relevant staff member. The policy abides by agreed timescales, any informal meetings must be held with staff within 10 working days of the submission of the request. If the student is dissatisfied with the outcome, they can proceed to the formal stage of the procedure. For both appeals and complaints procedures, a student's right to approach the Office of the Independent Adjudicator if dissatisfied is made clear.
- 2.84 At the formal stage, the complaint can be heard by a panel or in a relevant College committee meeting. Students are encouraged to set out in writing the nature of their complaint, reasons for dissatisfaction and how they think it should be settled. An investigating officer, appointed by the Principal, provides a written report to members of the panel, including any relevant documentation. The decision of the panel is communicated to the student and any appropriate staff in a written letter within 30 calendar days. The grounds for appeal are outlined. The Staff Handbook indicates that staff must be aware of, and be able to implement the Complaints Policy and Procedures. Staff acknowledged that there had been very few appeals or complaints within the last few years, but when appeals and complaints could be examined that they would be monitored and discussed at Academic Board.
- 2.85 Appeals procedures similarly involve an appeal panel that report to the Principal, in addition to an investigating officer who provides a written report. The appeal panel's decision is recorded and passed to both the student and the student representative, if applicable. Student's rights to a secondary appeal are made clear. The formal 'Completion of Procedures Letter' is issued to the student within 21 days of completion. Students confirmed that while they had not used the formal complaints or academic appeal processes, that they were aware of how to access these in order to make a formal complaint or academic appeal.
- 2.86 The College does have a complaints and appeals process for admissions decisions, which is explored in Expectation B2. These processes are not made available to prospective students which has led to a recommendation.

2.87 Overall, the College has appropriate policies and procedures for handling academic appeals and student complaints. These are made widely available to staff and students, who are aware of how and when to access them. Therefore the review team concludes that the Expectation is met and the associated level of risk is 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

2.88 The College does not have formal arrangements for the delivery of its provision at other organisations, therefore, this Expectation does not apply.

Expectation: Not applicable Level of risk: Not applicable

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

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

Expectation: Not applicable Level of risk: Not applicable

The quality of student learning opportunities: Summary of findings

- 2.90 In reaching its judgement about the quality of student learning opportunities the review team matched its findings against the criteria specified in Annex 2 of the published handbook.
- 2.91 All of the applicable Expectations in this area have been met and the risk is judged low in each case. There are five features of good practice identified in this area and one recommendation.
- 2.92 The review team identified three areas of good practice in Expectation B3. The College demonstrated a strategic approach to staff development and provided broad support and opportunities for staff to utilise and undertake to strengthen their subject knowledge and enhance delivery of teaching. The College also demonstrated one of its key teaching and learning priorities is to provide a continuous improvement environment through the effective sharing of best practice in a variety ways. The establishment of the College's academic review journal was also highlighted as good practice within this Expectation. The journal was considered by the review team as a valuable opportunity for both staff and students to engage in as part of the academic development ethos of the College.
- 2.93 The good practice identified in Expectation B4 highlights one of the main strategic drivers for the College in enabling student's career readiness, not just employability. The review team found that the College continually sought and developed opportunities where students could increase and apply their employability skills from the curricula to real-life work experience. The College also developed work-centred initiatives for students to demonstrate business acumen.
- 2.94 The final identified good practice in the area of quality of learning opportunities is found in Expectation B5. The review team found that the College goes beyond the usual mechanisms for student engagement through student representation and feedback. Students play roles in the recruitment and development of staff and are consulted on a regular basis on how provision is delivered and resources considered. This inclusive approach has created a partnership environment between staff and students and has resulted in good practice being identified.
- 2.95 There is one recommendation identified in this area. The review team found that the College had effective complaints and appeals processes but that the complaints and appeals policies relating to admissions decisions was not clearly accessible to prospective students and therefore has resulted in a recommendation.
- 2.96 The review team concludes that the quality of student learning opportunities at the provider is **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

- 3.1 The College Publications Policy aims to publish information for stakeholders that is accurate, honest, complete, reliable, legal, current, and accessible. The College's mission, values and overall strategy are clearly described in its Strategic Plan. The College upholds two cycles of published information revision; a short and long cycle, with the College Principal and Media Manager clearly noting in each case of publication which revision cycle the document belongs in. Short cycle documents include the College's social media pages, which are updated weekly on commission of the Principal or Media Manager. Once changed, the Media Manager informs the member of staff requesting the change that it has been completed and the Principal signs off the changes. Long cycle documents are involved in monthly reviewing and checking routines. The Principal is also responsible for commissioning long-cycle documentation, including a brief of what is required. Drafts are proofread before being signed off by the Principal.
- 3.2 The College's policies and procedures around the management and publication of information would allow the Expectation to be met.
- 3.3 The review team tested this Expectation by reviewing the College Publications Policy, information available to prospective students, and by taking into account of the College's responsibilities for information defined in partnership agreements. The team also discussed information provision with students and staff.
- 3.4 Prospective students can access information about the College on the College website, with pages listing relevant details regarding fees, entry requirements and directing them to the application and admissions process. The relationship between the College and the awarding body is also clearly explained. Each course page outlines the course curriculum, the learning resources and email links to admissions staff available to answer students' enquiries. These provisions ensure that students can select their course with an understanding of the setting in which they will be studying.
- 3.5 Prospective students also receive information about the College through College recruitment activities at local institutions, informing them of the options and courses on offer. Information is provided to prospective and current students, the general public and staff through the College website and various marketing materials. Information for the College website is sent to the Academic Manager for approval before being published. Regular VLE audits ensure that information provided to students is correct.
- 3.6 Records regarding arrangements for delivering higher education with the university are detailed in the College Strategic Plan and roles and responsibilities of the College and its awarding body are clearly delegated.
- 3.7 Students receive information about their chosen programme of study at induction. Students are provided with the student handbook and programme handbook, which contains information about module details, learning outcomes, the academic calendar and curriculum details. Students are also provided with a VLE handbook, which includes detail regarding

VLE use, plagiarism-detection software, uploading and checking assignments.

- 3.8 The College makes clear what is expected of students in terms of rules and regulations at Enrolment Day, induction and outlines these guidelines within the Student Handbook. Students confirmed that the information that they had received from the College was correct. The College Equality and Diversity policy outlines the College's commitment to creating a place where all staff and students are respected, listened to and encouraged to give their views. The Learning and Teaching Strategy also illustrates to staff the minimum level of information that must be provided to students so that they know what is expected of them. Opportunities for engagement are outlined in the Student Engagement Policy, and external examiners reports are uploaded onto the College VLE for staff and students to access. The academic frameworks and regulations in which each programme of study are available to students on the College website.
- 3.9 On completion of their course students are issued with a detailed transcript and College covering letter to ensure ease of employability. The awarding body is responsible for issuing the final certificate.
- 3.10 The College has policies and procedures to ensure accurate information provision. The review team finds that information for current students is fit for purpose, accessible and trustworthy, and students have found information provided by the College to be correct and reliable. Therefore the review team concludes that the Expectation is met and the associated level of risk is low.

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

- 3.11 In reaching its judgement about the quality of the information about learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.
- 3.12 The Expectations in this area has been met and the risk is judged low. There are no features of good practice or recommendations identified in this area.
- 3.13 The review team concludes that the quality of the information about learning opportunities at the **meets** UK expectations.

4 Judgement: The enhancement of student learning opportunities

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

- 4.1 The framework within which enhancement in the College operates is articulated in the Quality Assurance Policy. The Academic and Quality Assurance Board is comprised of the Principal, Academic Manager, lecturing staff, programme leaders and class representatives and has responsibility to continually enhance the quality of teaching and learning. Additionally, the College Higher National and DET Team Committee has a remit for the continuous enhancement of quality of learning and teaching.
- 4.2 All College committees have a formal overview of the quality of learning opportunities while day-to-day responsibility for maintaining quality and fostering enhancement is vested in the Academic Manager, Student Services Manager and Quality Assurance Manager.
- 4.3 Senior managers at the College have direct lines of communication and management with all staff. The College Academic and Quality Assurance Board, which includes the Principal and Academic Manager has strategic oversight of quality assurance and enhancement. For example, using this structure, for 2016-17 the College identified three strategic enhancement themes, assessment and feedback, employability and student engagement and has driven these forward.
- 4.4 The College's strategic approach to enhancement, its governance structure and supporting policies would allow this Expectation to be met.
- 4.5 The review team tested the Expectation by reviewing the College self-evaluation document and in meetings with College staff and students. The review team also considered the College's committee and reporting structure, the Quality Assurance Policy and reports from the College Higher National and DET Team Committee, as well an enhancement focused documents.
- 4.6 Senior staff at the College have a clear understanding of the nature of enhancement in the context of the College and they set the culture for quality assurance and the enhancement of provision. In 2016-17 the College, directed by the Principal set out three student enhancement themes to take forward. These were assessment and feedback on assessment, employability and student partnership.
- 4.7 The College sets out a number of mechanisms by which it takes deliberate steps to use the outcomes of programme monitoring and review processes for enhancement purposes. These include, Teaching Staff Protocols a Sharing of Best Practice Session, Reports on Assessment Practice and an Evolution of Assignment Briefs.
- 4.8 The College places significant value on and has extensive and effective measures in place to capture and to share best practice among its teaching staff. Staff make good use of these and value the resources that they can access and equally the engagement with colleagues that such sharing of best practice generates. The review team identified this as good practice in Expectation B3
- 4.9 Staff development is a strategic priority and the College has a comprehensive strategy to identify and to address staff development needs. These are driven by a staff

appraisal system which is supported by a peer mentoring structure. New and existing teaching staff valued the support that they get from their mentors and cited numerous examples of support from the College to extend their pedagogic and subject skills and knowledge. Tutors are supported by the College to undertake higher level qualifications, to seek and to gain recognition by the Higher Education Academy and to develop their skills in specific areas such as assessment. Students commented positively on the extent to which they see and experience staff expertise in their teaching and learning. The review team identified good practice in Expectation B3.

- 4.10 The College has developed an extensive programme of activity to support students to develop their employability. For example the College has embedded modules relating to professional and personal development into some of its higher national programmes. The Work Placement policy states that the College promotes work placement as key element of the wider curriculum and an essential tool for progression to employment. It also states that one of the objectives of the College is to impart education in such a way that they (students) are prepared to face (the) challenges in their careers and businesses. This includes offering non-credit bearing placements at the College to provide students with work experience, help them in networking to secure placements, help with career advice workshops in developing their CVs, and to prepare them for the interviews. External speakers and visits are organised for students to gain an appreciation of how organisations work. The College is developing this approach by securing the support of high profile businesses to act as 'MRC Angels' who will mentor students in their approach to business and personal development. Students spoke very highly about this aspect of their experience at the College. The review team identified the College's approach to employability as good practice in Expectation B4.
- 4.11 As one of its enhancement themes, the College has sought to enhance its assessment practice through reviews of assessment at programme and at College level. The review team heard how the College has used external speakers and services from its awarding body and organisation to drive up the quality of assessment and feedback. Students were very positive about the timeliness of feedback and the extent to which it helped them to develop their academic and assessment skills.
- 4.12 The College has a coherent and strategic set of initiatives around student engagement which include, student participation in staff interviews, staff observations, the development of a student union alongside existing student feedback and engagement mechanisms such as student representatives and feedback reports. Students were extremely positive about the extent to which the College takes deliberate steps to engage with them and cited numerous examples of how the College has responded to them. They expressed strong views that they felt genuine partners in their experience at the College. The review team identified the College's approach to involving students as partners as an area of good practice in Expectation B5.
- 4.13 In respect of teaching, learning and the academic development of students, best practice is shared through class observation, which includes joint observations with students, the use of a 'best practice' reports on which to capture exemplars by individual tutors and reports on sharing best practice, the latter including useful reference to best practice in the wider sector. Best practice is now also captured for staff on a 'best practice bank' on the College VLE and collectively has established an environment of strategic enhancement. The culture of continuous improvement has been identified as an area of good practice in Expectation B3.
- 4.14 To further enhance the academic development of both its staff and students the College has for some years published a Journal of Academic Review through which staff and students are exposed to the academic rigour of formal peer reviewed publications. This

initiative has been identified by the review team as an area of good practice in Expectation B3

- 4.15 The College takes a strategic approach to enhancing the academic skills and subject knowledge of students, such that they experience stretch and challenge through systematic, integrated and well established processes. Students were positive in their comments that they experienced such stretch and challenge in the studies as they progressed through levels 4, 5 and 6. For example, the College has also taken the deliberate and strategic step to promote a sense of academic progression in its students by delivering Level 4 and 5 programmes on one campus with its level 6 (BNU) programmes on its nearby Churchill House campus. Students valued this approach. Taken as a whole, and illustrated by the examples cited above, the strategic and innovative processes which enable students' progression and enhance their academic skills and subject knowledge has been identified as an area of **good practice**.
- 4.16 The College has well developed existing structures for the monitoring and review of provision which enable the College to evaluate the impact of these enhancement initiatives.
- 4.17 The College has an ethos of continuous enhancement of its provision, driven strategically by its senior staff and articulated in policies and procedures through its deliberative committee structure. It seeks to generate a learning culture and to engage with its students in genuine partnership to enhance their experience. It has identified and driven forward a number of initiatives that directly impact on student outcomes and which are highly valued by students. Therefore, the review team concludes that the Expectation is met and the associated level of risk is low.

The enhancement of student learning opportunities: Summary of findings

- 4.18 In reaching its judgement about the enhancement of student learning opportunities, the review team matched its findings against the criteria specified in Annex 2 of the published handbook.
- 4.19 The Expectation in this area has been met and the risk is judged low. There are no recommendations and one feature of good practice is identified in this area.
- 4.20 The review team found that the College has established and maintained through a strategic approach, an environment which fosters a continuous improvement mentality in both staff and students. Initiatives are constantly being developed, delivered and reviewed to enhance and improve the students learning opportunities, and support and enable the academic development of staff. Focus on employability skills for students and increasing progression remains a priority for the College and has been identified as good practice in this area.
- 4.21 The review team concludes that the enhancement of student learning opportunities at the provider is **commended**.

Glossary

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

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

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

Academic standards

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

Award

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

Awarding organisation

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

Blended learning

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

Credit(s)

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

Degree-awarding body

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

Distance learning

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

Dual award or double award

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

e-learning

See technology enhanced or enabled learning.

Enhancement

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

Expectations

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

Flexible and distributed learning

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

Framework

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

Framework for higher education qualifications

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

Good practice

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

Learning opportunities

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

Learning outcomes

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

Multiple awards

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

Operational definition

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

Programme (of study)

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

Programme specifications

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

Quality Code

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

Reference points

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

Self-evaluation document

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

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

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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