

## Quality Review Visit of Peterborough Regional College

April 2017

Key findings

### QAA's rounded judgements about Peterborough Regional College

The QAA review team formed the following rounded judgements about the higher education provision at Peterborough Regional College.

- There is limited confidence requiring specified improvements before there can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.
- There is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.

### Areas for development

The review team identified the following **areas for development** that have the potential to enhance quality and/or further secure the reliability and/or comparability of academic standards. The review team advises the College to:

- strengthen student involvement in senior College committees that consider higher education (Code of Governance)
- ensure that the College Board regularly reviews arrangements for complaints and appeals and the effectiveness of student engagement (Code of Governance)
- ensure that clear, explicit and accurate reference is made to the role of the awarding body and organisation in College complaints and appeal procedures (Student Protection)
- strengthen training for the Student Officer to include comprehensive guidance on supporting students with complaints and appeals (Student Protection).

### **Specified improvements**

The review team identified the following **specified improvements** that relate to matters that are already putting, or have the potential to put, quality and/or standards at risk at Peterborough Regional College. The review team recommends that Peterborough Regional College:

- reviews the committee structure to ensure that the College effectively exercises its responsibility for the oversight of higher education (Code of Governance)
- articulates comprehensive, clear and unified pre-contract information and Terms

and Conditions (Consumer Protection).

### About this review

The review visit took place from 3 to 4 April 2017 and was conducted by a team of three reviewers, as follows:

- Dr Roy Ferguson
- Mr Matthew Kitching (student reviewer)
- Ms Penny Renwick.

The overall aim of Quality Review Visit is to:

• provide the relevant funding body with an expert judgement about the readiness of a provider to enter, or continue to operate within, the higher education sector.

Quality Review Visit is designed to:

- ensure that the student interest is protected
- provide expert advice to ensure that the reputation of the UK higher education system is protected, including the protection of degree standards
- identify development areas that will help a provider to progress through a developmental period and be considered 'established'.

Each review visit considers a provider's arrangements against relevant aspects of the baseline regulatory requirements, and in particular:

- the reliability of degree standards and their reasonable comparability with standards set and achieved by other providers
- the quality of the student academic experience, including student outcomes where the provider has a track record of delivery of higher education.

### About Peterborough Regional College

Peterborough Regional College (PRC) is a large further education college with around 10,000 students. The College has delivered a range of higher education programmes for over 20 years. The higher education portfolio consists of Pearson HNC/D programmes and degree and foundation degree provision validated by Anglia Ruskin University (the University).

The College established University Centre Peterborough (UCP), a joint venture between the University and the College, in 2007. UCP has separate purpose-built accommodation on the campus of the College. There are currently around 600 students on the University programmes and around 150 on the Pearson programmes.

# Judgement area: Reliability and comparability of academic standards

# The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ)

1 UCP offers a range of programmes in partnership with the University and some Higher National programmes with Pearson. UCP is required by the agreement with the University to adhere to the University's Academic Regulations, which apply to all taught University awards. Academic standards are explicitly set and defined in the learning outcomes contained in the University programme specifications and module descriptors, which map qualifications to the appropriate level of the FHEQ. The programme validation processes of the awarding partners ensure that the relevant qualification descriptors are aligned appropriately with Subject Benchmark Statements. A number of programmes also have PSRB accreditation.

2 While the University's Senate has the ultimate responsibility for the academic standards of its awards, delegated through its Quality Enhancement and Standards Committee, UCP is responsible for managing the quality and delivery of teaching, learning and assessment in line with the University's and internal UCP regulations. That appropriate mechanisms are in place to safeguard academic standards was confirmed when UCP went through a recent external institutional review by the University, and there has also been a recent Pearson annual visit.

3 For Pearson programmes, there is a range of mandatory and optional units within each programme specification. The structure and level of the units must meet the programme specification requirements and the BTEC Centre Guide to assessment. Each module descriptor includes details of which learning outcomes are assessed by each assessment element, and students indicated that they understood the assessment requirements. Module leaders prepare sample assessments, which are forwarded to the Head of Department or nominee for onward transmission to the relevant external examiner. External examiner reports confirm that standards are appropriate to the qualification level, and therefore comparable with those of other UK higher education providers.

#### The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

4 The College's committee structure has been developed in part to reflect the growing nature of its higher education provision, in particular with the University, and its long term strategic desire to achieve university status. This lead to the creation of the UCP Board to oversee higher education delivered in partnership with the University. The PRC Board, also referred to as the Corporation Board, is the most senior College committee and has a Curriculum and Quality Sub-Committee (CQC) that has some responsibility for higher education, including ensuring that the College maintains awarding partners' standards.

5 Although the College provided evidence relating to its governance and quality management committee structures, the team found it challenging to understand and navigate the interrelationships and distribution of responsibilities for quality between the various committees, not least because there were some variances between the nomenclature and reporting lines referenced in the initial documentary submission and articulated during meetings at the visit, and because the Terms of Reference were distributed across various documents. Although the UCP Board oversees the business operation of UCP, minutes also indicate that it discusses issues relating to academic quality. The team was informed that the interrelationship between the UCP and PRC Boards was dependant on the issue being discussed. The College acknowledged that the distinct role of the UCP Board could make its interrelationship with other committees unclear, and informed the team that the Higher Education Academic Board had been introduced in 2015 to bring together oversight of higher education provision.

6 The team found that this aim had not been realised through the introduction of the Higher Education Academic Board. The College committee structure does not show a reporting line from UCP Board to Higher Education Academic Board and the terms of reference do not indicate that Higher Education Academic Board receives reports from UCP Board. The Higher Education Academic Board holds explicit responsibility for monitoring HNC/D provision; minutes demonstrate that there is consideration of UCP provision but that this is largely discursive, and minutes contain little evidence of decisions being taken or actions being agreed.

7 CQC also appears to have considerable responsibility for the oversight of Pearson provision and considers the HNC/D National Student Survey (NSS) Action Plan and other student feedback in some detail, though not the effectiveness of student engagement mechanisms themselves. CQC also discusses University provision including, for instance, annual monitoring reports relating to that provision. However, the extent of its authority, given the make-up of the UCP Board, whose membership includes University representatives, is unclear.

8 Staff informed the team that there was necessary overlap between College committees to ensure effective reporting and oversight, but the team concluded that there is insufficient distinction made between the responsibilities of the committees (College Board, Curriculum and Quality Committee, Higher Education Academic Board and the UCP Board), and some lack of clarity in their various reporting lines and limitations of authority in relation to the management and oversight of higher education provision.

9 Higher Education Academic Board holds responsibility for ensuring that the College meets and, where appropriate, complies with external reference points and associated updates. The team found evidence in a number of areas where the College's processes, information and arrangements did not align with baseline regulatory requirements. The team concluded that these issues were partly compounded by the lack of clear and effective College oversight through the committee structure, which would have enabled the College to identify weaknesses and omissions in its processes and information.

10 PRC Board has delegated the responsibility for higher education to subordinate College committees. Despite cross-membership of external governors on the CQC the team was unable to determine how the governing body as a whole satisfies itself about the standards and quality of the higher education provision for which it is responsible, especially given the lack of regular report to the College Board on key issues such as complaints; the apparent overlap between CQC and Higher Education Academic Board; and the distinct role of the UCP Board and its relationship to the rest of the College's committees. The team recommends that the College reviews the committee structure to ensure that the College effectively exercises its responsibility for the oversight of higher education, and identifies this as a **specified improvement**.

# The Expectations of the UK Quality Code for Higher Education (the Quality Code)

11 The College discharges its responsibilities in helping to set and maintain academic standards successfully. UCP follows awarding partners' processes for programme approval, with clear evidence of UCP and PRC meeting their obligations. This was confirmed at a recent institutional review with the University and in recent Pearson Centre Reviews. Responsibility checklists for APU and Pearson provision set out where responsibilities lie and whether they are shared.

12 Each University programme has a programme specification form which provides a holistic overview of modules and assessment, is cross referenced to the FHEQ and is a reference point for the delivery and assessment of the programme. The procedures for minor changes to University programmes are set out in the Senate Code of Practice Curriculum Approval and Review procedures. For Pearson programmes, the process is documented in the Higher Education Removal of Course, Curriculum Revisions. Any minor revisions to programmes go through the Faculty Quality and Enhancements Standards Committee.

13 During the programme approval and review process, a module to programme learning outcome mapping exercise is undertaken to ensure that the achievement of credit will enable the achievement of programme learning outcomes. Programme and module definition forms are clear, including detail of which learning outcomes are assessed by each assessment task. Learning outcomes are differentiated by level and include both subject and transferable skills and knowledge acquisition.

14 The University is supporting a move to the College being able to propose validation of its own programmes (rather than franchise of existing University curriculum) and the College is now moving from a pilot to a permanent basis following a successful Institutional Review in March 2017. The initial approval was for Computing and Information Systems, and the new approach is now rolling out to a number of engineering programmes. This development has been managed effectively by the staff with support from the University.

15 Annual monitoring is managed by the College for all programmes. Annual monitoring is thorough and excellent use is made of a range of data. Module performance, student achievement and classifications, external examiner reports and annual monitoring reports are reviewed and monitored at all levels. Documentation is detailed and evaluative, underpinned by a range of performance metrics.

16 Higher education provision uses external and independent expertise as part of the approval process, annual monitoring and curriculum revision and enhancement. The use of external and independent expertise is outlined in the responsibilities checklists. Some programmes or modules unique to UCP require direct liaison with the external examiner when setting assessments. This has always been the case for BA Archaeology and BA Multimedia Journalism and more recently for BSc Computing and Information Systems. External examiners assure the standards of work and achievement of learning outcomes and grade descriptors during visits.

17 The College manages both intermediate and final awards boards for Pearson provision, and University provision operates under the Senate Code of Practice on the Assessment of Students and Academic Regulations. Award boards make good use of quantitative data to evaluate module performance.

#### **Rounded judgement**

18 There is one specified improvement in this judgement area, which recommends that the College reviews its committee structure to ensure that it effectively exercises its

responsibility for the oversight of higher education. The specified improvement relates to weaknesses in the College's approach to this aspect of the baseline regulatory requirements which the team considers could, if not addressed, lead to serious problems over time.

19 The review team concludes that there is limited confidence requiring specified improvements before there can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.

# Judgement area: Quality of the student academic experience

# The Expectations of the UK Quality Code for Higher Education (the Quality Code)

20 Applications are submitted via UCAS for full-time programmes, and for part-time programmes directly to UCP. All applications are managed through the UCP Admissions Department. Information and advice about UCP and the range of programmes offered is provided by a range of mechanisms including virtual tours, taster sessions, prospectus, website, open days, applicant days and responses to enquiries. The admissions process for University programmes is set out in the University's Senate Code of Practice on Admissions (including Accredited Prior Learning), which is complemented by UCP's admission process. Applicants with a declared disability are contacted by the UCP Student Support Team to offer advice and support. Staff development for admissions is provided through support from the University and UCAS Conferences.

21 Staff new to UCP undertake a formal induction programme. There is a peer observation process in place, which requires staff to reflect on their pedagogic practice and identify enhancements for the incoming year. A Higher Education Teaching Review was undertaken in 2016-17 and a subsequent review of staff qualifications and experience was completed in early 2017. Both documents highlight areas of focus for future staff development, scholarship and institutional recruitment strategies. UCP has an active CPD programme to enable staff to gain teaching qualifications and higher subject-specific awards. The College has established a research and scholarship repository, which all staff have access to. While this resource is still work in progress, its aim is to provide general information on research and pedagogy and subject-specific research material, to support the further development of a research culture and to provide additional material for staff CPD activities.

A Higher Education Quality Teaching and Learning Lead role was developed in 2016, to support the induction of staff new to higher education delivery and the re-observation of higher education delivery staff who did not meet expectations in their peer review. UCP's Learning, Teaching and Assessment Committee also disseminates good practice through its representative members. As part of the Scholarship Catalyst Project, UCP gained funding for the appointment of a Scholarship Development Manager for a threeyear period. The aim of the post is to promote the development of an enhanced scholarly culture and practice within the institution.

23 Students complete annual module evaluation surveys and course leaders conduct regular course meetings to which students and staff are invited to discuss issues. Outputs from module report forms and annual monitoring reports are shared and discussed with students in tutorials. UCP Higher Education Managers identify emerging themes that inform topics for the annual learning, teaching and assessment conference, to which student ambassadors are invited. Students reported positively on the timeliness and usefulness of assessment feedback. Students are invited to attend a session with teaching staff for personal feedback on assessments and those who cannot attend receive feedback via email. UCP also operates a system that allows students to book time with individual staff as required. 24 UCP operates within the University's regulatory framework for assessment, which requires that assessment briefs are approved by an external examiner before being distributed to students. For Pearson awards, a lead internal verifier supports lecturers when developing assessments to ensure that they fulfil Pearson requirements. Sample moderation of assessed work is undertaken and marks are confirmed at Departmental Assessment Panels. Assessment marking is anonymous until the point of feedback.

25 UCP offers a wide range of support to students, including learning spaces and services to support their learning, and students have access to the UCP virtual learning environment (VLE). Students have regular tutorials to support their academic and personal development. A series of Study Excellence sessions offers tips and guidance on a broad range of study skills. The University Study Skills Plus resources are also available to students via the VLE. Students spoke positively about the range of support and opportunities offered by UCP for employability, which include employability days, volunteering, internships and work experience.

Students indicated satisfaction with the opportunities for engagement with the quality of their academic experience, including internal and external surveys; representation on committees; student ambassadors; and Student Staff Liaison Committee. Student Representatives are elected by their peers annually and training is provided. Actions taken in response to issues raised by students are communicated through a range of conduits, including the 'You Said, We Did' mechanism, the Student Officer, and through relevant committees. Students cited the establishment of the Sports Council, to further enhance opportunities for competitive and recreational sport, as an example of responsiveness to student feedback.

27 The new part-time Student Officer role was introduced in 2016 to support students during complaint and appeals processes. The position is occupied by a current student who provides other students with a direct channel to senior staff. The Student Officer also jointly chairs Student Council meetings with the Student Experience Officer.

28 The Higher Education Quality Cycle outlines the annual and periodic monitoring and review processes of the awarding partners. A wide range of quality assurance data informs these processes, including external examiner reports, student progression and retention and student module evaluations. Outputs from these processes are considered by a number of committees, including Faculty Boards and Learning, Teaching and Assessment Committee, and by the PRC Director of Quality and the Higher Education Managers in meetings with course leaders. The Higher Education Academic Board has oversight of planned actions to address any issues arising. The University also monitors academic provision at faculty level and Senate.

29 UCP has an active local industry network to facilitate feedback on programme developments. This also provides mechanisms for employer contributions to employability days and provision of opportunities for student placements and industry experience.

30 Students receive a programme handbook at admission as well as detailed module information, which includes information on assessment grading, feedback protocols, how assessed work is marked, available learning resources and support, and the latest report on student feedback on the delivery of relevant modules.

#### The relevant code of governance: such as the Higher Education Code of Governance published by the Committee of University Chairs (CUC) or the Association of Colleges' (AoC) Code of Good Governance for English Colleges

31 The College's governance arrangements encourage student involvement in academic governance, in particular at programme level. Student representatives are elected and the requirements of the role are outlined in the Student Representative Guide. Students are represented on a wide range of College committees (including the CQC, Student Staff Liaison Committee and the Student Council), and consider that their feedback is listened to and acted upon.

32 Despite significant representation on College committees, higher education students are not members of the PRC Board or the UCP Board. The College acknowledged that student participation in the UCP Board in particular might strengthen student involvement in quality assurance and the institution's decision making. While the College has recently introduced a 'Meet the Governors' programme, this operates outside of the formal committee structure. The team therefore advises the College to strengthen student involvement in senior College committees that consider higher education, and identifies this as an **area for development**.

33 Evidence provided by the College did not demonstrate that the College Board directly receives reports or regularly reviews the effectiveness of its student engagement arrangements. Staff informed the team that they are able to gauge the effectiveness of engagement mechanisms on the basis that they are used; for instance, students being elected as representatives, attending meetings and completing surveys demonstrates that these processes are working. The team concluded that the PRC Board has no formal mechanism in place for considering the sufficiency or effectiveness of the student engagement arrangements it operates for higher education provision.

34 Complaints regarding provision validated by the University are analysed by the UCP Board and a complaints report is also sent to CQC. This report distinguishes between complaints submitted by higher education students but only in relation to the number of complaints submitted. The PRC Board does not directly receive reports on higher education complaints and the team was not able to find evidence that the College's governing body or the Curriculum and Quality Sub-Committee had considered the effectiveness of its complaints procedures for higher education, or whether they were comprehensive and fit for purpose. The review team advises that the College Board regularly reviews arrangements for complaints and appeals and the effectiveness of student engagement, and identifies this as an **area for development**.

## Policies and procedures are in place to ensure consumer protection obligations are met (Competition and Markets Authority guidance)

35 UCP operates clear higher education admissions procedures and the College holds Matrix accreditation. For University provision, UCP follows the Senate Code of Practice on Admissions and for Pearson provision PRC operates its own procedures. The Academic Standards and Operations Committee, chaired by the Academic Director, maintains oversight of recruitment policy for University provision.

36 Responsibility for the accuracy of the prospectus lies with the College Principal. Responsibility for signing off changes to website content lies with the Academic Director. The UCP and PRC websites have dedicated sections about each programme. Students confirmed that their experience of admissions was helpful and supportive and that staff were on hand to guide their application. An innovation this year has been to offer UCAS application and finance surgeries. 37 The College has undertaken a check of its procedures and processes against the CMA guidance. However, this did not specify any changes made by the College, no comprehensive mapping to CMA guidance was evidenced, and alignment with the guidance has not been recorded in deliberative committee minutes. Although the College provided evidence of changes to documentation, there was no evidence that these changes had been made in response to CMA guidance. The review team was told of plans for training and further CMA mapping due to take place in the coming months; however, staff were unable to articulate a coherent response to CMA guidance, particularly in terms of the provision of specified pre-contract information and subsequent provision of a set of clear, accessible and unambiguous terms and conditions. Specifically, the review team has concerns about the lack of easily located and accessible information about complaints processes for applicants and the lack of information on additional course cost information (although the positive feedback regarding programme cost information for Pearson provision in the 2017 QMR Report is noted). Successful applicants are provided with an offer letter that provides basic information and links and further information is available from a number of sources. The review team was told that it was a deliberate strategy to provide information gradually to students holding an offer, as a means of maintaining contact.

38 The Higher Education Student Charter, available on the website and highlighted in student handbooks, sets out the commitments of the College to students and the expectations that students should meet. The College maintains that this (together with the University's Academic Regulations, the UCP Rules, Regulations and Procedures on the UCP website, and the information on the enrolment form) ensures consumer protection. When asked about the College's terms and conditions, students were initially unsure but with clarification referred to information provided in handbooks and via tutorials. The Charter states that students with any debts, including library fines, will be unable to receive their final certificate. Additionally, a confusing and potentially inaccurate leaflet about students' fee obligations if they withdraw from their programme is given to students at enrolment, and appears to place an upfront liability on students for a proportion of their fees. The review team recognises that the College has incorporated this information in its communications in the format provided by the University. The College's provision in respect of pre-contract information and terms and conditions falls short of the consumer protection requirements and there is a need to ensure timely and appropriate communication with students. The review team recommends that the College articulates comprehensive, clear and unified pre-contract information and terms and conditions, identifying this as a specified improvement.

#### Student protection measures as expressed through the Office of the Independent Adjudicator's (OIA) Good Practice Framework, the Parliamentary and Health Service Ombudsman's (PHSO) Principles of Good Administration, and HEFCE's Statement of Good Practice on Higher Education Course Changes and Closures

39 The Higher Education Removal of Courses and Curriculum Revisions Policy sets out the rationale and procedure to be followed where programmes are closed or altered. Programmes may be closed for a number of reasons including demand, financial or reputational issues. The Vice Principal Curriculum and Academic Director UCP have responsibility for determining whether a closure is appropriate and acceptable. The policy helps to ensure that students are made aware of the reasons for closures or revisions and are provided with information about the other options available, and that Higher Education Academic Board discusses the implications.

40 Where programmes are amended the College has clear processes for communicating changes. Students reported several examples of their feedback leading to amendments to programmes, including Crime and Investigative Studies students who had

requested that a work-based learning module be replaced with a module on digital forensics, and Sports students who had asked for a module on performance analysis to be replaced as it was deemed to be too theoretical and they had requested a module that was more practical.

41 Academic appeals relating to University provision are handled directly by the University. The College informed the team that the PRC Academic Appeals Policy governs its Pearson provision, but there is no explicit reference to this in the policy, which also states that for programmes validated at PRC by another institution, the Appeals Procedure established by that validating institution will take precedence and will apply in place of this policy. The team found that this had the potential to confuse students.

42 The College sets out its approach to complaints in its Higher Education Complaints Process for Pearson provision and in its Rules, Regulations and Procedures document for programmes validated by the University. The process for Higher Nationals comprises three potential stages, including a review of the complaint by the PRC Board. The process places an emphasis on informal resolution, details clear timescales for each stage and includes a template of the Completion of Procedures Letter as an appendix. The Rules, Regulations and Procedures details a set of arrangements which follow similar principles.

43 The team found, however, that neither policy refers to the role of the awarding partners in relation to student complaints. During the review visit staff initially stated that students did not have right of recourse to the University or Pearson prior to the OIA. This position is reflected in the Rules, Regulations and Procedures document, which has been revised recently but which does not align with the Quality Code and OIA guidance or with the Memorandum of Understanding between the College and the University, which states that the awarding body will provide the final decision with respect to complaints. College staff subsequently confirmed that students could escalate complaints to Pearson. The team advises the College to ensure that clear, explicit and accurate reference is made to the role of the awarding body and organisation in College complaints and appeal procedures, and identifies this as an **area for development**.

Support for students submitting complaints is provided by the Student Officer. The role is new within the College and an induction was delivered which provided an overview of the role of the OIA. Despite this, the team could not find evidence that the Student Officer has been provided with detailed training surrounding College complaints processes to address issues such as boundaries, determining where referral is appropriate or how to provide advice to students. The College informed the team that there are plans to enhance the training and induction provided to the post holder in future. The team advises the College to strengthen training for the Student Officer to include comprehensive guidance on supporting students with complaints and appeals, and identifies this as an **area for development**.

#### **Rounded judgement**

45 There was one specified improvement in this judgement area, which recommends that the College articulates comprehensive, clear and unified pre-contract information and terms and conditions. The specified improvement relates to weaknesses in the College's approach to this aspect of the baseline regulatory requirements which the team considers could, if not addressed, lead to serious problems over time. The review team also identified four areas for development in this judgement area.

46 The review team concludes that there is limited confidence requiring specified improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.

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