



Higher Education Review (Alternative Providers) of Stratford College London Ltd

December 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 Stratford College London Ltd. The review took place from 5 to 7 December 2017 and was conducted by a team of four reviewers, as follows:

- Mrs Patricia Millner
- Mr Nicholas Moore
- Miss Sarah Riches
- Ms Cara Williams.

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

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

² QAA website: www.qaa.ac.uk.

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

Key findings

Judgements

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

The College offers an award on behalf of Pearson Education Ltd (Pearson) and is a study centre of the University of Bedfordshire. As a study centre, the College has no formal responsibilities for the quality assurance of the University's programme. Therefore, the following judgements by the QAA review team are made in relation to Pearson programmes only.

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

Good practice

The QAA review team did not identify any features of good practice.

Recommendations

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

By May 2018:

- develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students (Expectations A2.1, A3.2 and C)
- strengthen policies, procedures and practice for the deterrence and detection of academic malpractice (Expectations B6 and A3.2)
- revise and implement policies and procedures to ensure the effective operation of valid, reliable and inclusive admissions (Expectation B2)
- develop policies and procedures for the identification and support of students with disabilities and/or additional learning needs (Expectations B4, B2 and B3)
- develop terms of reference for its Higher National Assessment Board in accordance with Pearson guidance and ensure that full records of meetings are kept (Expectations B6 and A3.2)
- provide clear and consistent information to students on how to make an academic appeal including to the Office of the Independent Adjudicator (Expectations B9 and C)
- review and implement procedures to ensure all information, including existing material, is fit for purpose, accessible and trustworthy (Expectation C).

By July 2018:

- produce a contextualised and definitive record of its Higher National provision (Expectation A2.2).

By September 2018:

- ensure appropriate governance arrangements are implemented to secure academic oversight and enable the College to meet its responsibilities for academic standards and the quality and enhancement of learning opportunities (Expectations A2.1 and Enhancement)
- develop clear academic and business criteria for the approval of new programmes and document all stages in the process (Expectation B1)
- strengthen procedures for the identification and support of students requiring English language development (Expectations B4 and B3)
- provide developmental feedback on summative assessments to enable students to improve their academic performance (Expectation B6 and B3)
- strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement (Expectations B8, A3.3 and Enhancement)
- develop a process for recording, monitoring and evaluating informal student complaints (Expectation B9)
- develop and implement a strategic and systematic approach to enhancement (Enhancement).

Affirmation of action being taken

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

- the steps taken to improve student achievement through the introduction of enhancement activities (Enhancement).

Financial sustainability, management and governance

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

About the provider

Stratford College London Ltd (the College) was established in 2002 and has been based in Tottenham Hale, London since May 2015. Its mission is twofold: 'to provide excellent teaching and learning facilities to support learners from different backgrounds; and to make our college a place of choice for prospective students by putting the needs of students at the heart of our college planning and strategic values'. The College's vision is 'to ensure that support given to learners inspire and guide learners towards the achievement of their career prospects and to develop into responsible citizens with the ability to play a significant role in society'.

The College offers a level 5 Higher National Diploma (HND) in Business on behalf of Pearson Education Ltd (Pearson) and is a study centre of the University of Bedfordshire. As a study centre, the College has no formal responsibilities for the quality assurance of the University's BA Business Administration top-up programme. Therefore, unless specified, the findings in this report refer to Pearson provision only.

The College underwent a successful QAA Review for Specific Course Designation (RSCD) in February 2014. At the time of the review, the College had 23 students. Three subsequent annual monitoring visits, for both educational oversight and course designation purposes, all resulted in the College being judged as making acceptable progress. During this time, student numbers grew to 371 at the December 2015 visit, and to 433 by December 2016.

At the time of the Higher Education Review (Alternative Providers) visit, there were 22 students on the BA top-up programme and 390 students on the HND programme, the latter made up of 197 students in year one and 193 in year two. HND students are required to attend classes at the College for two days per week.

According to information provided by the College, the retention rate from year one to year two over the last four academic years of the HND in Business has remained steady between 92 and 95 per cent. At the review visit, staff stated that no students in the last two academic years had dropped out of the course at the end of year one. Over the last four academic years, an average of 63 per cent of students have passed all eight units in an academic year, while 15 per cent passed four units or less. Very few students achieve a merit or distinction. Based on data for the first term of academic year 2017-18, 18 per cent of students fell below the College's 80 per cent benchmark rate for attendance.

The College has identified a number of key challenges facing its higher education provision including: increased competition among higher education providers; raising attainment among students and preparing them for their next steps; and the promotion of digital literacy.

As part of this review, the team also investigated a concern that was identified by the Student Loans Company and referred to QAA's Concerns Scheme by the Department for Education. The concern related to suspected academic malpractice by students enrolled on the HND in Business. The team addressed the concern in its management context, considering whether procedures for identifying and responding to academic malpractice are appropriate and operating effectively in practice, and whether recruitment processes are effective in ensuring that students have the appropriate level of English language for the programme they are enrolled in. Reference is made to the concern at appropriate points in the report (see Expectations A3.2, B2 and B6). While the team did not find evidence to uphold the specific allegation that students identified by the Student Loans Company had engaged in academic malpractice, concerns about the College's processes for managing academic malpractice and the recruitment of students were found to be justified.

Explanation of findings

This section explains the review findings in greater detail.

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

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

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

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

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

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

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

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

Findings

1.1 The College's responsibilities are set out in the partnership agreements and approval documents that it holds with its awarding partners. The College is an approved study centre of the University of Bedfordshire. The University has total responsibility for the design, approval and delivery of the BA Business Administration programme. Pearson is responsible for the setting of academic standards and approval of the Higher National Diploma (HND) in Business delivered by the College. The awarding organisation designs and approves unit descriptors and programme structure, ensuring that qualifications are fully aligned with the FHEQ and UK threshold standards. The Programme Team selects the optional units within the regulations set out by Pearson. The arrangements in place would enable the Expectation to be met.

1.2 The team tested the effectiveness of these arrangements by examining documentary evidence relating to partnership agreements, approval documents, minutes of committee meetings, relevant policies and procedures, Pearson's academic framework and regulations, annual Academic Management Review reports, and external examiner reports. The team also held meetings with senior and teaching staff.

1.3 The evidence reviewed shows the arrangements to be effective in practice. The College fulfils its responsibilities to the awarding partners for this Expectation as outlined in the partnership documents. The team saw evidence that training is provided for staff to ensure they are aware of the new Regulated Qualifications Framework (RQF) and the requirements for academic standards. According to external examiner reports and the Pearson Academic Management Review 2016-2017, the College is adhering to its responsibilities for the maintenance of academic standards on the HND programme.

1.4 While the awarding partners have ultimate responsibility through their own regulatory frameworks for ensuring that the relevant external reference points are adhered to, there is evidence that the College effectively manages its own responsibilities for doing this within its agreements. The review team therefore concludes that the Expectation is met and the associated risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.5 As a study centre, the College has no formal responsibilities for the quality assurance of the University of Bedfordshire's programme. Pearson is responsible for the setting of academic standards and the establishment of relevant academic frameworks and regulations for the HND programme. As well as adhering to the academic frameworks and regulations of its awarding partners, as articulated in the respective partnership documents, the College also has its own policies and procedures for managing its higher education provision. The College has a governance structure in which matters pertaining to academic standards are considered. The Quality Manual states that the personal responsibility for quality resides with the Director of Studies. The Academic Board acts as the supervisory body in administering the delegated responsibilities from Pearson. All other committees feed through and are checked by the Academic Committee. The governance structure, role responsibilities and regulatory policies and procedures are set out in the College's Quality Manual. These arrangements would enable the Expectation to be met.

1.6 The team tested the effectiveness of these arrangements by examining documentary evidence relating to partnership documents, minutes of committee meetings, relevant policies and procedures, Pearson's academic framework and regulations, and the Quality Manual. The team also held meetings with senior and teaching staff.

1.7 The governance structure, role responsibilities and regulatory policies and procedures are set out in the Quality Manual. The manual states that the key person for quality assurance at the College is the Director of Studies. However, the team heard contradictory evidence in meetings with senior staff about where ultimate responsibility lies between the Director of Studies and the Principal. The College has a large number of committees, with similar membership, and the team found the governance structure and interconnection between committees to be lacking in clarity. There was no evidence of formal meeting packs being prepared for committee meetings, while minutes are generally sparse and lack recorded actions. Some of the committee terms of reference within the manual are erroneous, while actions taken by certain committees, such as signing off all admissions applications at Academic Committee, are outside their terms of reference. In addition, the team saw evidence from minutes of Academic Committee that there is regular review and discussion of the minutes of Management Committee but little reference to quality issues raised in other committees (see also paragraph 2.13). The team therefore **recommends** that by September 2018 the College ensure appropriate governance arrangements are implemented to secure academic oversight and enable the College to meet its responsibilities for academic standards and the quality and enhancement of learning opportunities.

1.8 The College has developed a number of policies and procedures related to assessment, with the key policies outlined in the Quality Manual (see also paragraph 1.21). Although the policies individually address Pearson requirements, they do not amount to a coherent and comprehensive set of academic regulations. There are instances of significant overlap between policies, inadequate tailoring of generic awarding organisation policies to the College's circumstances, misleading information, and inconsistent use of key terms (see also paragraph 1.24).

1.9 The HND Programme Handbook provides a summary of some student-related policies and a list of others, some of which are not relevant to students. The programme specification provides a summary of some policies and extracts from Pearson specifications concerning resubmissions, repeat units, compensation and calculation of the award. However, students met by the team were unaware of these regulations. The Quality Manual, which is not available to students on the virtual learning environment (VLE), contains a further selection of policies but is not comprehensive. It does not, for example, include the policies on standardisation, special consideration or plagiarism, nor does it provide information about how the policies are operationalised within the College. The College states that each policy is subject to annual review by the Academic Committee but there is no evidence of any review taking place. The findings in paragraphs 1.8-1.9 lead to the conclusion that the College's regulatory framework governing its Higher National provision is fragmented, lacking in consistency and is not adequately communicated to students. The absence of a coherent and consolidated regulatory framework accessible to students and staff significantly increases the likelihood of inconsistent decision making, thus presenting a risk to academic standards. The team therefore **recommends** that, by May 2018, the College develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students.

1.10 The ineffective governance structure, a lack of clarity about key roles and committee terms of reference, and a regulatory framework that is fragmented and not adequately communicated to students means that the Expectation is not met. The team makes two recommendations concerning academic regulations and governance arrangements. The level of risk is serious because of ineffective operation of parts of the governance structure, significant gaps in policy, structures and procedures, and breaches by the College of its own quality assurance management procedures.

Expectation: Not met

Level of risk: Serious

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

1.11 Pearson is responsible for providing the standard generic programme specification, including the overall qualification specification, which contains information on the purpose, structure and assessment of the HND programme. Additionally, the awarding organisation provides the College with guidance contained within the BTEC Centre Guide to Assessment on how to develop a contextualised specification to address the local dimension specific to the needs of its students. The College is then responsible for producing and providing definitive programme information relating to the HND, including a tailored programme specification. The contextualised programme specification is intended to provide specific information on the selected units and pathway, as well as teaching, learning and assessment methods. The College states that the Programme Leader produces the programme specification and approval is granted by the Academic Committee. Any changes to programme specifications are recommended by the Quality Nominee (the Principal) and approved at Academic Committee. The Quality Nominee is also responsible for following up on any changes and communicating these to the Programme Team. These arrangements would allow the Expectation to be met.

1.12 The team evaluated the effectiveness of these arrangements by examining the Pearson BTEC Centre Guide to Managing Quality, the Pearson HN Business Specification, the Pearson BTEC Centre Guide to Assessment 2017-2018 (level 4 to 7), the College programme specification and programme handbook, and a sample of assignment briefs. The team also met with students as well as senior, academic and support staff.

1.13 The College relies upon three key documents, which combined provide definitive programme information - the programme specification, programme handbook and unit assignment briefs. Used together, they provide the information required by current and prospective students, staff, external examiners and internal verifiers. Students confirmed that information about their programme is made available to them in a timely manner during induction and on the VLE. Despite this, students met by the team were unclear about the structure of the programme, the overall requirements of assessment and grading criteria, and levels of performance required to successfully complete their qualification.

1.14 The College is required by its awarding organisation to produce a contextualised and definitive record of its Higher National provision. However, it is evident that much of its programme specification has been copied from generic and out of date BTEC documentation (as evidence, the College supplied the team with documentation going back to Issue 6, September 2014). The review team found several examples where the programme specification is not meeting the requirements of the awarding organisation as stated in the current BTEC Centre Guide to Assessment 2017-18: levels 4 to 7. For example, the College has not included information about local market conditions; local student needs; the choice of optional units made by the College; any additional units imported under 'meeting local needs' or units that may have been locally devised by the College; names and contact details for all members of staff involved in the delivery and assessment of the programme; and the selected approach to teaching and assessment methodology. The team therefore **recommends** that, by July 2018, the College produce a

contextualised and definitive record of its Higher National provision.

1.15 Overall, the team concludes that the Expectation is met because the relevant information is contained within College documents and students are provided with this information at induction and on the VLE. The team makes a recommendation for the College to take this information, together with that provided by the awarding organisation, to produce a contextualised and definitive record of the Higher National provision. The level of risk is moderate because of a lack of clarity about the responsibilities conferred by the awarding organisation.

Expectation: Met

Level of risk: Moderate

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

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

Findings

1.16 The University of Bedfordshire has total responsibility for the approval processes of the BA Business Administration programme. Pearson is responsible for the setting of academic standards and approval of the HND programme delivered by the College. The awarding organisation designs and approves unit descriptors and programme structure, ensuring that qualifications are fully aligned with the FHEQ and UK threshold standards.

1.17 The College's responsibilities for programme design and approval focus on the strategic decision to apply to deliver a particular programme, adherence with the requirements and regulations of the awarding organisation, and choice of optional units. The College has a Course Approval Procedure, a Course Approval Record Sheet, and a statement describing the processes involved in the design and approval of units, programmes and qualifications. These documents provide a stepped approach, which culminates in a submission to the Academic Committee for final approval to run a new programme. Subsequently, the relevant documentation is prepared and submitted to the awarding organisation for approval. Once approved, the Programme Team selects the optional units within the regulations set out by Pearson. The Programme Team also designs and sets the assessments for the units, which are checked by an internal verification process and a post hoc external verification by Pearson. The arrangements in place would enable the Expectation to be met.

1.18 The team tested the effectiveness of these arrangements by examining documentary evidence relating to minutes of committee meetings, the Quality Manual, relevant policies and procedures, Pearson's academic framework and regulations, annual Academic Management Review reports, and external examiner reports. The team also held meetings with senior and teaching staff.

1.19 The evidence reviewed shows the procedures to be effective in practice. The College effectively complies with Pearson requirements and procedures and the team saw evidence that it gained approval in 2016 to deliver additional Higher National programmes and a Diploma in Education and Training. The outcomes of the Academic Management Review visits undertaken by Pearson in 2016 and 2017 were positive and indicate that the College complies with approval processes and carries out assessment which, according to Pearson, follows the regulations of the awarding organisation and reflects national standards. Pearson external examiner reports are positive about appropriate work-related assessment instruments, assessment decisions, internal verification processes and the management of academic standards. As well as engaging with training delivered by the awarding organisation, teaching staff also engage in internal meetings with the Principal and with other members of the Programme Team in order to gain understanding of academic standards and the requirements of the awarding organisation.

1.20 Within the context of the awarding organisation's procedures and regulations, the College fulfils its responsibilities for academic standards with regard to programme approval processes. The team therefore concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met

Level of risk: Low

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

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

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

Findings

1.21 Responsibility for the design, delivery and assessment of the BA Business Administration programme is vested in the University of Bedfordshire. The College is responsible for the assessment of students on the HND programme in accordance with the guidance provided by Pearson. The awarding organisation designs and approves the programme and its component units and sets the learning outcomes and assessment criteria; the College devises assessment instruments to enable students to demonstrate achievement of the specified learning outcomes and grading criteria for most of the units. There are assignments set by Pearson for one unit each at levels 4 and 5. Students' work is first marked and internally verified by College staff before being checked by the Pearson external examiner. College staff provide feedback to students on their assignments. The College is also required to hold an Assessment Board for its HND programme. The College has developed a number of policies and procedures to regulate the conduct of assessment including recognition of prior learning; internal verification; standardisation of marking; academic malpractice and plagiarism; assignment submission; special consideration; and academic appeals. The key policies are collated in the Quality Manual. Pearson monitors the assessment process through the reports of its external examiner and annual monitoring reports submitted by the College. The academic frameworks provided by Pearson, supplemented by College-devised policies and procedures, would enable the Expectation to be met.

1.22 The team tested the effectiveness of the arrangements by examining Pearson guidance, the College's Quality Manual and its policies and procedures, assessment briefs, samples of students' marked work, committee minutes, assessment board minutes and papers, external examiner reports, and annual reports to Pearson. The team also held meetings with senior and teaching staff, and students.

1.23 Higher National students are introduced to unit-level learning outcomes and assessment criteria at induction. Assessment tasks clearly set out the relevant learning outcomes and assessment criteria for each grade. Students' marked work indicates clearly where, and the extent to which, outcomes have been achieved. The Pearson external examiner has consistently expressed satisfaction with setting, verification, marking and moderation processes. Analysis of students' results shows that the majority of students achieve pass grades; few achieve the higher grades of Merit or Distinction. The College has recently established additional enhancement activities to equip students with the academic skills to enable them to improve their attainment.

1.24 As noted in paragraph 1.21, the College has developed a number of policies and procedures related to assessment. Although the policies individually address Pearson requirements, they do not amount to a coherent and comprehensive set of academic regulations (see also paragraphs 1.8-1.9). In terms of assessment, the team found instances of significant overlap, for example between the Malpractice Policy and the Plagiarism Policy; inadequate tailoring of generic awarding organisation policies to the College's circumstances, for example the provision for the adjustment of examination marks for programmes without examinations and which do not use percentage marking; policies containing misleading information, for example the Assignment Submission Policy, revised in September 2017, refers to QCF regulations concerning the unavailability of compensation whereas compensation is permitted for the RQF provision being delivered at the College; and inconsistent use of terms such as mitigation and extenuating circumstances in different documents. These findings feed into the recommendation in paragraph 1.9 that the College develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students.

1.25 As part of this review, the team was asked to investigate a concern that was submitted by the Department for Education. One aspect of this concern was to investigate the effectiveness of the College's policies and procedures for the prevention and detection of academic malpractice. While the College has in place policies and procedures related to academic malpractice and plagiarism in accordance with Pearson guidance, the team identified a number of deficiencies in its approach to academic misconduct which are considered in more detail in Expectation B6 (see paragraphs 2.44-2.45). These deficiencies include underdeveloped statements of what constitutes academic malpractice; the absence of clear procedures for dealing with allegations of malpractice; the lack of a range of penalties; and delays in obtaining and implementing plagiarism-detection software. The team therefore concludes that the College's policies and procedures for detecting and dealing with academic malpractice and plagiarism are not sufficiently developed and these weaknesses pose a serious risk to academic standards. These findings contribute to the recommendation in paragraph 2.45 for the College to strengthen policies, procedures and practice for the deterrence and detection of academic malpractice.

1.26 The College has established an Assessment Board for its Higher National provision. However, the Board lacks clear terms of reference setting out its role, purpose, membership, quoracy and frequency of meetings, as recommended by Pearson. The team also identified a number of weaknesses in the operation of the Board including failing to hold Boards as scheduled; inadequate minute taking; and the apparent presence of a student at one Board meeting. These matters are discussed further in Expectation B6 (see paragraph 2.46). The team concludes that the Assessment Board is not operating as intended by Pearson, thus posing a potentially serious risk to academic standards. These findings contribute to the recommendation in paragraph 2.46 that the College develop terms of reference for its Higher National Assessment Board in accordance with Pearson guidance and ensure that full records of meetings are kept.

1.27 The team concludes that the College's arrangements for discharging its responsibilities for the award of credit and qualifications are not effective and therefore the Expectation is not met. Weaknesses include the absence of a coherent and consistent set of academic regulations accessible to students; the lack of effective means to detect academic malpractice; and the failure to operate the HN Assessment Board as intended by the awarding organisation. Collectively, these findings contribute to three recommendations and present a serious risk to academic standards. The risk is serious because of ineffective operation of parts of the College's governance structure relating to quality assurance, and significant gaps in policies, structures and procedures relating to the College's quality assurance.

Expectation: Not met
Level of risk: Serious

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

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

Findings

1.28 The University of Bedfordshire has sole responsibility for monitoring and review of the BA Business Administration programme. The College will, however, be able to participate in any relevant aspects of the next periodic review carried out by the University. The College is required to follow Pearson's processes for monitoring its Higher National programme. External examiners employed by Pearson and an annual Academic Management Review (AMR) carried out by the awarding organisation monitor the achievement of UK academic standards and the alignment of the College's processes and procedures with Pearson's regulations and programme specifications. The College also completes and submits an Annual Programme Monitoring Report (APMR) to Pearson using a prescribed template. In addition, the College has a number of quality review processes as described in its Quality Manual. These are summarised in a quality cycle and a quality enhancement cycle, which describe methods used for review and improvement. The manual also describes the roles of the main committees and personnel involved with the assurance of academic standards and quality. Pearson carried out a periodic review of its Higher National programmes during the academic year 2014-15. The College gathers information from a wide range of relevant sources, including staff and students, to complete its quality reports for external and internal audiences. The College does not have its own process for carrying out periodic reviews of programmes. The arrangements in place would enable the Expectation to be met.

1.29 The team explored the effectiveness of the approach by scrutinising documentation including awarding partners' requirements and processes, the College's Quality Manual, reports and action plans relating to monitoring and review processes, and minutes of relevant meetings. The team also held meetings with students and senior, teaching and support staff.

1.30 The AMRs and reports from external examiners confirm that the HND programme is delivered in accordance with the Pearson specification and academic standards are maintained. The College has effectively addressed the small numbers of issues raised.

1.31 In terms of academic standards, the elements of programme monitoring exist but do not culminate in a coherent review bringing all information together for a rigorous overview of standards. For example, the Programme and Module Evaluation 2016-2017 document, which is compiled and discussed by the Programme Team, lacks any quantitative information and critical analysis. The minutes of the Academic Committee where this is discussed are brief and do not record any detailed critical discussion. These findings contribute to the recommendation in paragraph 2.56 that the College should strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement.

1.32 Overall, the team found that the College engages positively with the awarding organisation's processes for programme monitoring and review and its own elements of quality review work sufficiently well to maintain academic standards. The team does, however, make a recommendation to strengthen the critical evaluation within annual monitoring. Therefore, while the Expectation is met, the level of risk is moderate because, despite quality assurance procedures being broadly adequate, there are some shortcomings in terms of the rigour with which they are applied.

Expectation: Met

Level of risk: Moderate

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

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

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

Findings

1.33 As a study centre, the College has no requirement to make use of external and independent expertise at key stages of setting and/or maintaining academic standards for the BA Business Administration programme. Pearson is responsible for the setting of academic standards and approval of the HND programme delivered by the College, and therefore for the input of external and independent expertise. The awarding organisation is also responsible for the appointment and use of external examiners to maintain academic standards for the Higher National provision. The College has recently appointed an independent external examiner to provide a greater level of overview of its academic operations. The specific remit of the role is to provide an additional review of academic standards and to review assessments. These procedures would enable the Expectation to be met.

1.34 The review team considered the effectiveness of these procedures by scrutinising partnership documents, external examiner reports, annual monitoring reports, and the role and remit of the independent external examiner. The team also held meetings with senior staff.

1.35 Overall, the team found these processes to work effectively in practice. The College adheres to the relevant procedures of the awarding organisation. Reports from external examiners confirm that the HND programme is delivered in accordance with the Pearson specification and academic standards are maintained. The College has effectively addressed the small numbers of issues raised by external examiners. The College's annual Programme and Module Evaluation document is compiled as an action plan from a range of sources that includes external examiner reports. It is discussed at Programme Team meetings and actions are forwarded to the Academic Committee. The Programme Leader is responsible for signing off completed actions.

1.36 The independent external examiner has undertaken one visit and produced a report for the College which failed to meet all the expectations of the role, for example in not reviewing any course work.

1.37 Overall, the College works in accordance with the regulations and procedures of its awarding organisation. The team therefore concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

1.38 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. Three of the seven applicable Expectations are met with low levels of associated risk.

1.39 Expectations A2.2 and A3.3 are met with a moderate level of risk, which indicates lack of clarity about responsibilities, and some shortcomings in terms of the rigour with which quality assurance procedures are applied.

1.40 Expectations A2.1 and A3.2 are not met, and with a serious level of risk, which indicates ineffective operation of parts of the governance structure, significant gaps in policy, structures and procedures, and breaches by the College of its own quality assurance management procedures.

1.41 The review team makes six recommendations relating to this area: develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students (Expectations A2.1 and A3.2); ensure appropriate governance arrangements are implemented to secure academic oversight and enable the College to meet its responsibilities for academic standards and the quality and enhancement of learning opportunities (Expectation A2.1); produce a contextualised and definitive record of its Higher National provision (Expectation A2.2); strengthen policies, procedures and practice for the deterrence and detection of academic malpractice (Expectation A3.2); develop terms of reference for its Higher National Assessment Board in accordance with Pearson guidance and ensure that full records of meetings are kept (Expectation A3.2); strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement (Expectation A3.3).

1.42 There are no affirmations or good practice identified in this judgement area.

1.43 For most issues highlighted in Part A, the College has not recognised that it has major problems. Where the College has recognised weaknesses, the review team saw little evidence that policies, procedures and practice are sufficiently developed to address the issues.

1.44 The review team concludes that the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies and/or other awarding organisations at the College **does not meet** 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 ultimate responsibility for the design, development and approval of programmes rests with the awarding partners. The College's responsibilities are set out in paragraphs 1.16-1.17 and focus on the strategic decision to apply to deliver a particular programme, adherence with the requirements and regulations of the awarding partner, and choice of optional units for Higher National provision. These arrangements would allow the Expectation to be met.

2.2 The team tested the effectiveness of these arrangements by examining documentary evidence relating to minutes of committee meetings, the Quality Manual, relevant policies and procedures, Pearson's academic framework and regulations, annual Academic Management Review (AMR) reports, and external examiner reports. The team also held meetings with senior and teaching staff.

2.3 The College has effective arrangements for preparing and submitting documentation to the awarding organisation for approval to run higher education programmes. The team saw evidence of the HND Business and the Diploma in Education and Training undergoing successful approval by Pearson. The positive reports of the annual AMR process carried out by Pearson suggest that the College delivers and assesses the HND Business competently and in close alignment with the requirements and regulations of the awarding organisation. The Programme Team takes a considered approach to the selection of the optional units that is based on student needs and feedback, for example in terms of employment opportunities.

2.4 While the course approval procedure has provision for exploration of the academic and business cases to be defined by the Management Committee, there are no guidelines provided for the development of a rationale for the strategic fit of a new programme or the staffing and learning resource implications. Although there is reference to the student market in terms of demand, there is no acknowledgement of a need for detailed market research and competitor analysis. The Design and Approval of Modules, Programmes and Qualifications document focuses solely on the need for programmes to meet academic standards such as the FHEQ and RQF. Minutes of the Academic Committee demonstrate its dominant role in approval of new programmes but there is a lack of any record of detailed discussion or documented evidence for the academic and business cases. Therefore, the team **recommends** that, by September 2018, the College develop clear academic and business criteria for the approval of new programmes and document all stages in the process.

2.5 Overall, the team considers that the procedures for introducing new programmes of study meet the Expectation. However, the lack of criteria and detailed and documented

consideration of the academic and business cases in committee minutes demonstrate shortcomings in the rigour with which the College's processes are applied and therefore constitute a moderate level of risk.

Expectation: Met

Level of risk: Moderate

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

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

Findings

2.6 The College is responsible for recruiting students to the BA Business Administration programme but admission is the sole responsibility of the University of Bedfordshire. The College has primary responsibility for the recruitment and admission of students to the HND programme in accordance with guidance provided by the awarding organisation. Responsibility for the development of admissions policies and procedures, including determining admissions criteria in accordance with Pearson guidelines, is vested in the Admissions Committee. The College has developed a number of policies and procedures relating to the recruitment, admission and registration of HND students; these include an Access and Participation Statement, an Admissions Policy and Procedure, Admissions Code of Practice, and Admissions and Registration Procedure. Although staff make use of UCAS publications to check the equivalence of overseas qualifications and English language requirements, the College does not subscribe to UCAS and consequently all applications are made directly on a College-devised application form which can be downloaded from the website. Applicants are invited to an informal screening interview conducted by admissions staff and are required to complete basic numeracy and literacy tests. Admissions staff collate all required documentation, including evidence of eligibility for student loan funding, which is then passed to the Academic Committee for acceptance or rejection. Applicants are informed by letter of the outcome of their application. In-house training is provided for admissions staff. These arrangements would enable the Expectation to be met.

2.7 The team examined the effectiveness of these arrangements by reviewing the College's prospectus and other marketing material, the website, admissions policies and procedures and working documents, minutes of committee meetings, and a sample of students' admission files. The team also held meetings with students and senior, teaching and support staff.

2.8 The College markets its programmes through its website, newspaper advertising, including in UK-based foreign language publications, and by word of mouth. Although Pearson does not specify formal entry requirements for its programmes, providers are expected to recruit with integrity and to ensure that students have a reasonable expectation of success. Pearson guidance refers to students recently in education having an entry profile of a level 3 qualification or, if the student is returning to study, recognition of prior learning (RPL) should be considered. The College's entry criteria for Higher National programmes, as set out in its Admissions Policy and Procedure, are a level 3 qualification, or GCSE passes (level 2) with a minimum of three years' work experience in a related field, or five years' work experience at a supervisory level. In addition, non-native speakers are expected have level B2 on the Common European Framework of Reference (CEFR) or 5.5 on the International English Language Testing System. The team found that the entry criteria are not presented in a consistent way in the College's publications and staff who met the team were unable to articulate clearly the requirements (see also paragraph 3.3).

2.9 As part of this review, the team was asked to investigate a concern that was submitted by the Department for Education. One aspect of this concern was whether students are being admitted with the necessary English language skills. Sample admissions

files requested by the team contained appropriate evidence of English language competence at B2 level, although not all students met by the team were able to interact with fluency and spontaneity.

2.10 The admissions files revealed that few students are admitted with a level 3 qualification. Instead, the majority of students hold level 2 qualifications or their overseas equivalent. Information for applicants about documentary requirements for entry omits any reference to holders of level 2 qualifications providing proof of three years' work experience and, in practice, no specific proof was evident in the admissions files. Senior staff met by the team stated that they had not admitted any students through RPL on the basis of five years' work experience. The team concludes that the failure to obtain proof of work experience for holders of level 2 qualifications amounts to a breach of its own entry criteria.

2.11 The admissions files also revealed that the employment record section of the application form is not usually completed, nor is a CV or resumé provided as required. In addition, the informal screening interview does not include questions about an applicant's employment history. Consequently, staff are unable to identify whether applicants have the requisite work experience for entry with a level 2 qualification profile. The application form does not require applicants to write in continuous prose, nor does the basic literacy test. Not all of the literacy and numeracy tests in the admissions files had been marked. The College is therefore unable to judge whether applicants have sufficient skills and experience to undertake a level 5 course. The Programme Leader and teaching staff are not provided with the outcome of the literacy and numeracy tests; however, senior staff stated that the results would be used to design general enhancement activities, although no examples could be provided in relation to numeracy.

2.12 The informal screening interview consists primarily of admissions staff providing information to an applicant; the section on the screening form to record questions asked by the applicant is rarely completed. Neither the application form nor the screening interview invites applicants to declare a disability or identify any additional learning needs, in breach of its commitment to equality of opportunity in recruitment and admissions as set out in its Equal Opportunities Policy. The earliest opportunity a student has to declare additional learning needs is at the time of enrolment when equal opportunities monitoring and medical forms are completed. The College stated that it had not had a student with a disability, including dyslexia, in any of the last three academic years. The team concludes that the College's arrangements for enabling applicants to declare additional learning needs are inadequate. These findings contribute to the recommendation in paragraph 2.31 that the College develop policies and procedures for the identification and support of students with disabilities and/or additional learning needs.

2.13 The team received two versions of the terms of reference of the Admissions Committee. In one version, the Committee has responsibility for finalising and submitting the admissions list to the Academic Committee for approval; however, the Admissions Committee only meets annually and minutes of its meeting in April 2017 fail to provide evidence regarding the consideration of individual applications. In practice, the Academic Committee reviews applications and makes the final admissions decision, even though this responsibility is not listed in its terms of reference and these meetings are not included in the schedule of committee meetings. Furthermore, documentation confirming sign-off on applications by Academic Committee notes that it is doing so at the request of the Admissions Committee. Both the Academic Committee and Admissions Committee include student representatives, which would be inappropriate if the details of individual applications are scrutinised by either committee. The team concludes that the arrangements for the scrutiny of applications and approval of admissions decisions lack clarity.

2.14 The College's Complaints procedure is available on its website but it does not

explicitly state that it is available to applicants.

2.15 Paragraphs 2.8-2.14 highlight a number of weaknesses in the College's policies and procedures for the recruitment, selection and admission of students. These include inconsistent presentation of entry criteria; failure to admit in accordance with its own criteria; the lack of opportunity for applicants to declare a disability or additional learning needs; inadequate processes to identify the potential of applicants to undertake studies at level 5 or their English language support needs; and indeterminate arrangements for approving admissions. The team therefore **recommends** that, by May 2018, the College revise and implement policies and procedures to ensure the effective operation of valid, reliable and inclusive admissions.

2.16 The team concludes that the College does not adhere to the principles of fair admissions and therefore the Expectation is not met. These weaknesses present a serious risk to the integrity of the admissions process and the potential for poorly prepared applicants to be admitted. The serious level of risk has occurred due to ineffective operation of parts of the College's governance structure, significant gaps in policy and procedures, and breaches by the College of its own quality assurance management procedures.

Expectation: Not met

Level of risk: Serious

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

Quality Code, *Chapter B3: Learning and Teaching*

Findings

2.17 The College's strategic goals with regard to its educational aspirations are clearly set out and have recently been mapped and actioned in its 'Pursuing Key Strategic Goals' document. The College also has a Teaching and Learning Strategy, which can be found in its Quality Manual. The strategy sets out some broad principles supporting the College's approach to teaching and learning. The College has a Student Charter that outlines responsibilities in relation to the course, attendance, behaviour and submission of work. All applicants are required to complete basic numeracy and literacy tests. The College has a Staff Development Policy setting out induction processes and commitment to train new tutors and provides training opportunities to staff to develop in their teaching role. Staff at the College undergo lesson observations as a way of reviewing performance and sharing good practice. The Quality Manual sets out the responsibility of the Programme Leader for the review of units and the overall programme. These policies, strategies and procedures would enable the Expectation to be met.

2.18 The review team tested the operation of these arrangements by examining course documentation, a sample of students' work, the Quality Manual, Teaching and Learning Strategy, Student Charter, Staff Development Policy, external examiner and annual monitoring reports, and teaching observation schedules and records. The team also held meetings with students, and senior, academic and support staff.

2.19 Students are generally positive about the quality of teaching and learning at the College. In particular, students value the range of activities and teaching styles. Based on their feedback, students have also seen examples of positive changes being made; for example the introduction of microphones in lectures to try to overcome the noise from the external environment. Students also appreciate the enhancement activities that have been provided by the College in areas such as critical evaluation and academic writing (see also paragraph 4.3).

2.20 The College has a Staff Development Policy and provides encouragement and training opportunities to staff to develop in their teaching role. For example, three members of staff are being given time to study for their PhD. Although not yet included in the Teaching and Learning Strategy, the opportunity to gain Higher Education Academy (HEA) fellowship is now available to staff through the partnership with the University of Bedfordshire. Initial workshops have been held and staff are currently putting together their portfolios. The College accepts that it needs further training and development with regard to assessment.

2.21 The College uses basic numeracy and literacy tests to be taken by all applicants to help assess suitability for the course. However, the tests are very basic and the team saw evidence from a sample of admissions files that not all of them are marked (see also paragraph 2.11). In addition, the College makes no use of the results of these tests to improve teaching practice or support individual students as the Programme Leader and teaching staff are not provided with the outcomes of these tests. These findings contribute to the recommendation in paragraph 2.30 for the College to strengthen procedures for the

identification and support of students requiring English language development.

2.22 The College states that it has not had a student with a disability, including dyslexia, in any of the last three academic years. The team found that students have limited opportunities to declare a disability or identify any additional learning needs (see also paragraphs 2.12 and 2.31). These findings contribute to the recommendation in paragraph 2.31 that the College develop policies and procedures for the identification and support of students with disabilities and/or additional learning needs.

2.23 While external examiner reports record good feedback being provided to students and no issues with its timeliness, the samples of marked work and feedback forms seen by the team showed that students received limited guidance on how to improve the quality of their assignments (see also paragraph 2.43). In addition, internal reviews have identified some concerns about the timeliness of feedback. These findings contribute to the recommendation in paragraph 2.43 that the College provides developmental feedback on summative assessments to enable students to improve their academic performance.

2.24 Despite the College's approach being outlined in the 'Pursuing Key Strategic Goals' document and the Teaching and Learning Strategy, it was apparent in meetings with staff that these documents had limited dissemination, use and discussion among staff.

2.25 The College has some strengths in teaching and learning and is taking steps to improve its weaker aspects. The team has highlighted some weaknesses (see paragraphs 2.21 to 2.24) including ineffective identification and support for English language development, limited opportunities to declare a disability and/or additional learning need, limited developmental feedback on assessed work, and limited use of key strategic documents. Collectively, these findings contribute to three recommendations. Overall, the team concludes that, while the Expectation is met, the level of risk is moderate because of a lack of clarity about some responsibilities with regard to the development of students as independent learners.

Expectation: Met

Level of risk: Moderate

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

Quality Code, Chapter B4: Enabling Student Development and Achievement

Findings

2.26 As a study centre of the University of Bedfordshire, the College has responsibility to provide the physical teaching resources and to stock sufficient library books for the BA Business Administration programme. It is the responsibility of the University to approve these resources. The primary resource for students on the BA programme is the University's online library and resources. The College has a number of mechanisms by which it reviews the delivery of the teaching on the HND programme (see also paragraph 2.33). Through these mechanisms, resource requirements to support the delivery of learning are identified. The College reviews its resources at the Learning Resources Committee and requests for additional resources are considered at the Management Committee. Student feedback from the Staff Student Liaison Committee (SSLC) and Student Representative Council, together with other feedback from students and external examiners, are fed into the Management Committee. The College also has processes set out in its Quality Manual for special consideration through its Welfare and Student Support Committee and a Special Consideration Policy. These policies and procedures would enable the Expectation to be met.

2.27 The review team tested the effectiveness of the arrangements and resources through an examination of documentation including partnership documents, external examiner reports, annual monitoring reports, student feedback, Quality Manual, and minutes of relevant committee meetings. The team also held meetings with students, and teaching and support staff.

2.28 There is mixed evidence regarding the appropriateness of resources. While evidence from external examiner reports and students met by the team did not indicate any issues, NSS comments did raise some concerns about library resources, computers, printers and books. The team also heard evidence that the College deals with issues effectively, for example with the noisy classroom environment and wireless internet speed.

2.29 The College has also acted to improve employability by providing sessions on interview skills, job searching and writing curricula vitae, as well as offering opportunities for students to visit different companies and organisations (see also paragraph 4.4).

2.30 The College's three-tier tutorial system has been developed into a four-tier approach which now includes the Quality Enhancement Team to identify and deliver optional quality enhancement activities in study skills (see also paragraph 4.3). Students met by the team appreciate the tutorial system and the new sessions, which are repeated according to a planned timetable. Despite the apparent benefits, take-up of sessions has been limited and its ability to address issues of English language development has not been addressed. This is particularly important as a significant proportion of the student population speak English as their second language. This is compounded by the ineffective use made by the College of the findings from the literacy tests taken by applicants (see also paragraphs 2.11 and 2.21). The team therefore **recommends** that, by September 2018, the College strengthen its procedures for the identification and support of students requiring English language development.

2.31 Neither the application form nor the screening interview invites applicants to declare a disability or identify any additional learning needs, in breach of its commitment to equality

of opportunity in recruitment and admissions as set out in its Equal Opportunities Policy. The earliest opportunity a student has to declare additional learning needs is at the time of enrolment when equal opportunities monitoring and medical forms are completed (see also paragraphs 2.12 and 2.22). The completion of the equal opportunities monitoring form is not compulsory and the form is only used for Higher Education Statistics Agency returns. Despite seeing evidence that at least one student required support for a health condition which the College has now recognised towards the end of the first term, the College stated on more than one occasion that it has not had a student with a disability, including dyslexia, in any of the last three academic years. The team concludes that the College's arrangements for enabling students to declare additional learning needs are inadequate, both at application and during their studies. The team therefore **recommends** that, by May 2018, the College develop policies and procedures for the identification and support of students with disabilities and/or additional learning needs.

2.32 While acknowledging the developments in the College's tutorial system and its attempts to improve the employability of students, the team concludes that there are significant weaknesses in how the College develops students' academic, personal and professional potential. In particular, the team makes two recommendations regarding the inability to address English language development and the inadequate arrangements for enabling students to declare a disability and/or additional learning needs. The team concludes that the Expectation is not met. The level of risk is moderate due to a lack of clarity about responsibilities, and insufficient priority given to assuring quality in the College's planning processes.

Expectation: Not met
Level of risk: Moderate

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

Quality Code, Chapter B5: Student Engagement

Findings

2.33 The College is responsible for developing, implementing and facilitating arrangements and processes to ensure engagement with students. The College formally defines and promotes the range of opportunities available to students in a Student Engagement Strategy and a Student Charter. There are a number of mechanisms by which students can engage with the College including internal surveys, focus groups, National Student Survey (NSS), SSLC, the Student Representative Council (SRC), and programme and module evaluations. The SRC is the body set up to act as the liaison between the management team and students. SRC members are elected on an annual basis by students at cohort level and include a President and Deputy President. Members of the SRC are trained on how to initiate student feedback on a range of topics including tutorial support and student enhancement activities. The President or Deputy President sits on the Management Committee, Academic Committee, and Quality Enhancement Team. The opportunities provided for effective student engagement would enable the Expectation to be met.

2.34 In testing this Expectation, the team considered a range of documents including minutes from relevant meetings, surveys, training for SRC members, Student Engagement Strategy, and the Student Charter. The team also held meetings with senior, support and academic staff, and students.

2.35 The review team found that the procedures for student engagement work effectively in practice. The College has worked towards creating an environment within which students and staff engage in discussions to bring out improvement of the educational experience. The College is fulfilling the expectations within its Student Engagement Strategy. Both staff and students are fully aware of the importance of students providing meaningful feedback about College activities. There is also an adequate system for informing students of the results of their feedback and this includes the formal SRC and SSLC systems as well as the more informal discussions that take place regularly between staff and students. In addition, the College has adequate procedures in place for the review of its student feedback system. The team saw evidence that findings from surveys on a range of topics are considered by the Quality Enhancement Team and this forms the basis for action planning. The team heard examples where students' views are incorporated into updates to units, one instance being a trip to a manufacturing company being rescheduled into a different unit in accordance with student preference.

2.36 Representational structures exist to gather the student voice across the College and the team saw evidence of student representation at some, but not all, previous meetings of Academic Committee, Quality Enhancement Team, and Management Committee. Other evidence shows some of the terms of reference are not fully developed, including a lack of membership details, and these issues are covered more fully in Expectation A2.1 (see also paragraph 1.7). Although student representatives do not receive any formal training or documentation, they do receive a briefing from the Principal to support them in their role. At the time of the review visit, student representatives met by the team declared that current SRC members had not yet sat on any of the committees.

2.37 Overall, the procedures in place ensure deliberate steps are being taken to engage students adequately as partners in the assurance and enhancement of their educational experience. Students feel that their views are listened to and they have adequate insight into

what the College does to improve their learning experience. Therefore, the Expectation is met and the associated risk is low.

Expectation: Met

Level of risk: Low

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

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

Findings

2.38 The University of Bedfordshire is responsible for the assessment and recognition of prior learning of students on the BA Business Administration programme. The College is responsible for the assessment of students on the HND programme in accordance with the guidance provided by Pearson. The College's responsibilities with regard to assessment of the HND programme are outlined more fully in paragraph 1.21. These arrangements would enable the Expectation to be met.

2.39 The team tested the effectiveness of the arrangements in practice by examining a range of documentation including the Quality Manual, assessment policies and procedures, programme specification and handbook, minutes of meetings of the Assessment Board and associated papers, external examiner reports, annual monitoring reports to Pearson, samples of assessment tasks, assessed work and feedback to students, and details of an internal investigation into academic malpractice. The team also held meetings with senior staff, teaching staff, and students.

2.40 The College has appropriate arrangements in place for the internal approval of assessment tasks before they are released to students, and internal verification of marking. The Pearson external examiner has consistently reported that assessment and verification practices are effective, thorough and accurate.

2.41 The College prepared for the introduction of the new RQF specification for the HND in Business by participating in training delivered by Pearson and cascading this training to other members of the teaching team. Teaching and senior staff met by the team acknowledged that there had been some initial difficulties in devising appropriate assessment tasks to meet Pearson's expectations of more holistic scenario-based forms of assessment, and that the external examiner was involved in checking the first assessment briefs before release to students.

2.42 The Quality Manual contains the key policies related to assessment including an Assessment Policy that provides the framework for effective assessment; internal verification, assignment submission and feedback; assessment malpractice; recognition of prior learning; and appeals. The manual is not a comprehensive compendium of relevant policies as it does not, for example, include policies on standardisation, special consideration or plagiarism, nor does it provide information about how the policies are operationalised within the College. Senior staff met by the team confirmed that the process for recognition of prior learning has not been used in practice.

2.43 Students are introduced to the assessment requirements of the HND programme at induction. Both the programme handbook and the College's programme specification contain assessment-related information, although neither document articulates the assessment strategies or methods to be employed. Students met by the team were clear that they could submit draft assignments for formative feedback on two occasions and that if they were referred after a summative submission, they would have one opportunity to resubmit. Students confirmed that they received written feedback within three weeks, as specified in

the Assignment Submission Policy, although internal reviews have identified some concerns about the timeliness of feedback. The feedback form indicates whether the grading criteria for Pass, Merit and Distinction have been met but evidence seen by the team suggested that students have not received guidance on their use of English, referencing or more generally how they might improve their work to attain higher grades in future assignments. The team therefore **recommends** that, by September 2018, the College provide developmental feedback on summative assessments to enable students to improve their academic performance.

2.44 As part of this review, the team was asked to investigate a concern that was submitted by the Department for Education. One aspect of this concern was to investigate the effectiveness of the College's policies and procedures for the prevention and detection of academic malpractice (see also paragraph 1.25). Students met by the team confirmed their awareness of the policies on academic malpractice and plagiarism. In addition, they are required to sign authenticity statements in accordance with Pearson guidance. While the College does have academic malpractice and plagiarism policies as required by Pearson, they are not fully developed. Deficiencies include no explicit reference to contract cheating as a form of malpractice; the provision of only one penalty irrespective of the seriousness of the malpractice or the circumstance of the student; and the absence of a clear procedure for determining breaches of the policies, indicating the responsibilities of relevant staff.

2.45 The College claims that it has had only one instance of academic malpractice involving collusion between a group of students. Hitherto, staff have relied on formative assessment and feedback processes to identify whether student work is authentic. The College acknowledges that this approach might have been adequate to detect plagiarism when student numbers and group sizes were small, but that the increase in student numbers requires a more systematic method. The Academic Management Review report 2013-14 also recommended that the College use plagiarism-detection software. In March 2016, the College reported to Pearson that it had acquired access to plagiarism-detection software to manage the authenticity of students' work and, in June 2016, the College informed the University of Bedfordshire that it had recently purchased a licence for plagiarism-detection software but it had not yet scheduled training for staff. In February 2017, the Academic Committee approved the annual subscription for the software but it was not until September 2017 that the College required students to submit assignments via the VLE to enable the work to be checked through the software. Staff have now received training and guidance notes are available to students on the VLE. Due to the timing of assessments, the first submissions were due to take place shortly after the review visit and therefore the plagiarism-detection system had yet to be tested. The team concludes that the College's policies and procedures for assuring the authenticity of students' work are rudimentary. Despite informing the awarding organisation of its acquisition of the plagiarism-detection software in March 2016, it has taken the College nearly two years to train staff, produce guidance notes and implement the system at a time when there has been considerable growth in student numbers. These failings represent a serious threat to both academic standards and the quality of student learning opportunities as the mechanisms for preventing and detecting academic malpractice are ineffective. The team therefore **recommends** that, by May 2018, the College strengthen its policies, procedures and practice for the deterrence and detection of academic malpractice.

2.46 The College holds an Assessment Board for its HND provision as required by Pearson (see also paragraph 1.26). However, the team identified a number of shortcomings in its operation including no terms of reference setting out the purpose of the Board; not meeting at the end of each term as indicated in the HND Programme Handbook; an SRC representative being shown as a member of the Board; minutes of the October 2017 Board recording the presence of a student, thus breaching the requirements of confidentiality; and minutes of meetings not recording the matters Pearson require to be covered by a

Board as set out in its UK Guide to Quality and Assessment. The team therefore **recommends** that, by May 2018, the College develop terms of reference for its Higher National Assessment Board in accordance with Pearson guidance and ensures that full records of meetings are kept.

2.47 Overall, the team concludes that there are significant weaknesses in the College's assessment processes and therefore the Expectation is not met. Weaknesses include inadequate developmental feedback to students on their summative assessed work; unsatisfactory arrangements for detecting and deterring academic malpractice; and ineffective operation of the Higher National Assessment Board. Collectively, these findings result in three recommendations which, taken together, present a serious risk to the quality of learning opportunities. The risk is serious because of ineffective operation of parts of the College's governance structure relating to quality assurance, significant gaps in policies, structures and procedures relating to the College's quality assurance, and breaches by the College of its own quality assurance management procedures.

Expectation: Not met

Level of risk: Serious

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

Quality Code, Chapter B7: External Examining

Findings

2.48 As a study centre of the University of Bedfordshire, the College has no role in the external examining of the BA Business Administration programme. The awarding organisation is responsible for the appointment and use of external examiners for the Higher National provision. External examiners undertake an annual visit where they review assessment, verification, marking and second marking, and feedback to students. They can also meet the students and review the documentation relating to the confirmation of the marks and awards. These procedures would enable the Expectation to be met.

2.49 The review team considered the effectiveness of these procedures by scrutinising partnership documents, external examiner reports, and minutes of relevant committee meetings. The team also held meetings with students, and senior and teaching staff.

2.50 Overall, the evidence showed the processes and procedures to be effective in practice. The team saw evidence that the external examiner was content with the College's adherence to the procedures set out by Pearson in preparation for their visit and in providing the necessary evidence regarding marking, moderation and internal verification. The College responds to the external examiner reports and reviews them both at programme level and at Academic Committee. Action plans are produced at programme level and subsequently discussed at programme committee meetings. Students met by the team confirmed that they can access the external examiner reports on the VLE. Reports are also discussed at the SSLC.

2.51 The College adheres to the procedures set out by the awarding organisation, and reviews and responds to external examiner reports in an appropriate way. The team therefore concludes that the Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

2.52 The University of Bedfordshire has sole responsibility for monitoring and review of the BA Business Administration programme. The College is required to follow Pearson's processes for monitoring its Higher National provision. In addition, the College has number of quality review processes as described in its Quality Manual. The College's responsibilities with regard to programme monitoring and review are outlined more fully in paragraph 1.28. The arrangements in place would enable the Expectation to be met.

2.53 The team explored the effectiveness of the approach by scrutinising documentation including awarding partners' requirements and processes, the College's Quality Manual, reports and action plans relating to monitoring and review processes, and minutes of relevant meetings. The team also held meetings with students, and senior, teaching and support staff.

2.54 The awarding organisation's Academic Management Review (AMR) reports for the last two academic years comment positively on a number of areas including the College's administrative processes, assessment arrangements, staff and physical resources, policies, quality assurance procedures and adherence to Pearson regulations. The 2015-16 report resulted in no essential actions or recommendations. The latest report for academic year 2016-17 does recommend that minutes should be more detailed to demonstrate how AMRs feed into the process of continual improvement. The team noted some improvement in the level of detail of the minutes. Pearson external examiner reports for academic year 2016-17 demonstrate satisfaction with academic standards, quality of work-related assessments, pastoral support and learning materials.

2.55 The Programme Team plays a significant role in quality assurance and annual monitoring. The annual Programme and Module Evaluation document is compiled as an action plan from a range of sources, which includes NSS data, external examiner reports, and staff feedback. It is discussed at Programme Team meetings and actions are forwarded to the Academic Committee. The Programme Leader is responsible for signing off completed actions. The Programme Team also gathers feedback from a range of student sources including module reviews and the SSLC as well as external reports such as the AMR. Actions are formulated and implemented. Any significant issues are raised at Management Committee and Academic Committee and actions are directed to other relevant committees or implemented by the Academic Committee.

2.56 The College does not have an overall annual monitoring report for its higher education provision. Instead, it relies on the AMR, APMR, the Programme and Module Evaluation document, and information from various sources of student feedback. The College acknowledges that the Pearson APMR provides important additional guidance in annual monitoring, for example in stipulating that necessary reference points are adhered to as a way of assuring the College that academic standards are set and maintained at the correct level. While the College comprehensively completes the APMRs, there is a low level of critical comment. For example, there is no analysis of the achievement data or how to improve pass/completion rates. This is one example of a lack of critical comment and analysis in internal and external reports and action plans, and a lack of in-depth discussion reflected in committee meeting minutes (see also paragraph 1.31). The lack of key

performance indicators, and clear presentation and discussion of quantitative retention, progression and achievement data prevents a robust assessment of success and identification of opportunities for improvement in student achievement. The team therefore **recommends** that, by September 2018, the College strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement.

2.57 Overall, the team found that the College engages positively with the awarding organisation's processes for programme monitoring and review and its own elements of quality review work sufficiently well to assure the quality of learning opportunities. The team does, however, make a recommendation to strengthen the critical evaluation within annual monitoring to improve further student learning opportunities and achievement. Therefore, while the Expectation is met, the level of risk is moderate because, despite quality assurance procedures being broadly adequate, there are some shortcomings in terms of the rigour with which they are applied.

Expectation: Met

Level of risk: Moderate

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

Quality Code, Chapter B9: Academic Appeals and Student Complaints

Findings

2.58 The College operates its own Complaints Policy and three-stage formal procedure. At stage one, complaints are resolved informally. If they are not, the issue moves to stage two within two days and a complaints form must be completed. If the issue remains unresolved, the complaint proceeds to stage three within three days, which involves the Board Appeal Panel investigating the matter. Students are made aware of their right to refer a complaint to the awarding partner or to the Office of the Independent Adjudicator (OIA) once the College process has been exhausted. The College operates its own Academic Appeals Policy and procedure. The awarding organisation expects the College to inform students about the basis on which an appeal can be made. Appeals may relate to assessment decisions being incorrect or an assessment not being conducted fairly. If there is an appeal by a student, this and its resolution must be documented. If students are not satisfied with the result of their appeal after following the College's processes, they can request the OIA to review their complaint. Pearson's determination of an appeal is final, subject to the involvement of the OIA. The College states in its Quality Manual that the Academic Committee will regularly review these policies and procedures through student and staff feedback. Information about complaints and appeals is made available to students through a variety of methods including the induction process, VLE and website, HND programme specification, and HND programme handbook. The College has procedures and policies in place that would allow the Expectation to be met.

2.59 In testing the Expectation, the team considered a range of documents including the complaints and appeals policies and procedures, the HND programme handbook and programme specification, the Quality Manual, and the VLE. Meetings were held with students, and senior teaching and support staff.

2.60 The College states they have not received any formal complaints or academic appeals in the last three years, thus making it difficult for the team to assess how effective their systems for dealing with complaints and appeals are in practice. Students are encouraged to raise any concerns informally with their personal or academic tutor or with the student representative who may pursue the concern on their behalf. While the team was provided with examples from staff and students where issues have been effectively dealt with informally or through the student representative system, the team found no documentary evidence of how the College records and reviews informal complaints or appeals. This makes it difficult to assess how the College monitors and evaluates the effectiveness of their appeals and complaints procedures, and how it reflects on the outcomes of those procedures for enhancement purposes. The team therefore **recommends** that, by September 2018, the College develops a process for recording, monitoring and evaluating informal student complaints.

2.61 The team did see evidence that the College provides information about the policies and processes, including registration with the OIA, through a variety of methods including the induction process, VLE and website, HND programme specification, and HND programme handbook. Students met by the team were aware of the complaints and appeals procedures, or knew where they could find this information. There are, however, some inconsistencies in the information contained within College documents with regard to academic appeals (see also paragraph 3.8). For example, the HND programme handbook

does not make clear the basis on which a student can appeal. The process it has in place only covers a student's right to appeal against an assessment decision but does not cover their right to appeal against a case of academic misconduct. While students are made aware of their right to forward the appeal to the awarding organisation when a decision continues to disadvantage them after the internal appeals process has been exhausted, they are not being informed about their right to take their academic appeal to the OIA. The HND programme specification provides information on students' right to appeal to Pearson, but it does not include information on their right to appeal to the OIA which is a requirement of the awarding organisation. The team therefore **recommends** that, by May 2018, the College provide clear and consistent information to students on how to make an academic appeal including to the OIA.

2.62 Overall, despite the recommendations to provide clear and consistent information to students on how to make an appeal and to record, monitor and evaluate informal student complaints, the team concludes that the Expectation is met and the level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

2.63 The achievement of learning outcomes on the HND programme does not require students to spend time in the workplace. This Expectation is therefore not applicable.

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

2.64 The College does not offer research degrees. Therefore this Expectation is not applicable.

Expectation: Not applicable

Level of risk: Not applicable

The quality of student learning opportunities: Summary of findings

2.65 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. Three of the nine applicable Expectations are met with low levels of associated risk.

2.66 Expectations B1 and B8 are met with a moderate level of risk, which indicates that although quality assurance procedures are broadly adequate, there are shortcomings in terms of the rigour with which they are applied. Expectation B3 is also met with a moderate level of risk, which indicates a lack of clarity about responsibilities.

2.67 Expectation B4 is not met, with a moderate level of risk, which indicates some lack of clarity about responsibilities, and insufficient priority given to assuring quality in the College's planning processes.

2.68 Expectations B2 and B6 are not met, with a serious level of risk, which indicates ineffective operation of part of the governance structure, significant gaps in policy, structures and procedures, and breaches by the College of its own quality assurance management procedures.

2.69 The review team makes seven new recommendations relating to this area: develop clear academic and business criteria for the approval of new programmes and document all stages in the process (Expectation B1); revise and implement policies and procedures to ensure the effective operation of valid, reliable and inclusive admissions (Expectation B2); strengthen procedures for the identification and support of students requiring English language development (Expectations B4 and B3); develop policies and procedures for the identification and support of students with disabilities and/or additional learning needs (Expectations B4, B2 and B3); provide developmental feedback on summative assessments to enable students to improve their academic performance (Expectation B6 and B3); provide clear and consistent information to students on how to make an academic appeal including to the OIA (Expectation B9); develop a process for recording, monitoring and evaluating informal student complaints (Expectation B9).

2.70 The review team repeats three recommendations from Part A: strengthen policies, procedures and practice for the deterrence and detection of academic malpractice (Expectation B6); develop terms of reference for its Higher National Assessment Board in accordance with Pearson guidance and ensure that full records of meetings are kept (Expectation B6); strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement (Expectation B8).

2.71 There are no affirmations or good practice identified in this judgement area.

2.72 For most issues highlighted in Part B, the College has not recognised that it has major problems. Where the College has recognised weaknesses, the review team saw little evidence that policies, procedures and practice are sufficiently developed to address the issues.

2.73 The review team concludes that the quality of student learning opportunities at the College **does not meet** UK expectations.

3 Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1 The Strategic Plan 2016-20 sets out the mission statement, vision, direction and goals of the College. The College has produced its own policy and procedure for Public Information, including a Marketing Team design process for the College prospectus and other promotional material. According to the College's own policy and procedure, all website and prospectus material is approved by the Academic Committee. However, the College also states that, in practice, staff have the authority to communicate autonomously in a range of media according to the nature and level of their role. For the HND programme, the College has responsibility for producing a staff handbook, a programme handbook, and a programme specification as means of providing information about wider College policies, procedures, learning opportunities and assessment regulations. The awarding organisation provides the College with documents such as the BTEC Centre Guide to Assessment to assist with producing information about Higher National programmes. The arrangements in place would enable the Expectation to be met.

3.2 The review team tested the effectiveness of the College's arrangements for publication and assurance of information by exploring the availability and accuracy of information on the website and VLE, and in the prospectus, promotional materials, policies and procedures, student and staff handbooks, programme specification, and admissions files. The team also held meetings with senior, teaching and support staff, and students.

3.3 Despite the review team being informed that admissions staff were briefed in June 2017 about the consequence of failing to provide transparent information to prospective students, the College continues to advertise on its website and in its prospectus several programmes, including an HND in Hospitality Management, that are not currently running and are dependent upon recruiting sufficient numbers of students. This proviso is not made explicit. In addition, information on entry criteria for prospective HND Business students, advertised on the website and in the prospectus, is inconsistent with the College's Admissions Policy (see also paragraph 2.8). The College has only recently become aware of the guidance produced by the Competition and Markets Authority (CMA) on relevant legislation. In his meeting with the team, the Principal was unsure at which committee CMA regulations are considered and where CMA guidance would be discussed.

3.4 Although the College website makes available fee information in a document entitled 'price list', it is not where users would reasonably expect to find it, therefore making it difficult for prospective students to locate. Furthermore, the prospectus lacks any information on fees. The Director of Studies accepted there may be an issue with the accessibility of information on fees. Some students met by the team said they were not clear about the cost of the HND programme. In addition, the prospectus states that a non-refundable £25 registration fee should accompany the Enrolment Form, but the team was later informed that this fee is only applicable to short courses and not for funded programmes.

3.5 The team found several other examples of inaccurate and misleading information on the website and in the prospectus. Examples in the prospectus include the apparent

option to study the HND Business programme part-time over 36 months, something which is not available to students in the current academic year; pointing readers to the Pearson generic Higher National Business programme specification rather than towards the College's own contextualised version (see also paragraph 1.14); a statement claiming that, on average, there are 16 to 22 academic students per class as opposed to the real figure of 40 to 50. An example of misleading information on the College website includes inaccurate references to affiliations/and or memberships with several external bodies and organisations, for example, UCAS, Royal Society for Public Health and The Association of International Accountants.

3.6 The College states that it requires all information on its provision to be compliant with its Public Information Policy and to be approved by the Academic Committee, but the team found no evidence of such approval being granted within the minutes of Academic Committee meetings. Although the College stated that the Marketing Team had ultimate responsibility for developing all marketing materials, the review team was informed during a meeting with senior staff that no such Marketing Team exists. Instead, the responsibility lies solely with the Director of Studies. There are anomalies between the Public Information Submission Chart and the Public Information Policy. For example, the former states that the Director of Studies is responsible for marketing and ensuring marketing materials are accurate, while the latter states that this is the responsibility of the Marketing Team. Based on the findings described above, the team concludes that the process for approval and signing off information about higher education provision is not robust. Lines of responsibility to ensure accuracy, completeness and timely publication of information are not clear and not fully understood by staff. The extent to which the Academic Committee has oversight and responsibility to sign off information before publication is ambiguous. The team therefore **recommends** that, by May 2018, the College review and implement procedures to ensure all information, including existing material, is fit for purpose, accessible and trustworthy.

3.7 Although the College has chosen to put information about their framework for the management of academic standards and quality assurance into one document, the Quality Manual, the content is incomplete and did not mirror what the team heard during meetings with staff, therefore resulting in a lack of consistency. These findings contribute to the recommendation in paragraph 1.9 for the College to develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students.

3.8 Students are made aware of their right to take unresolved complaints to the OIA by information on notice boards and in the Quality Manual and HND programme handbook. The HND programme specification provides information on students' right to appeal to Pearson, but it does not include information on students' right to appeal to the OIA, which is a requirement of the awarding organisation. These findings contribute to the recommendation in paragraph 2.61 for the College to provide clear and consistent information to students on how to make an academic appeal including to the OIA.

3.9 In summary, the information provided by the College is not fit for purpose as it does not consistently enable its intended audiences to form reliable views about its higher education provision. The team makes one new recommendation for the College to review and implement procedures to ensure that all information is fit for purpose, accessible and trustworthy. The team therefore concludes that the Expectation is not met. The level of risk is serious because of the ineffective operation of parts of the College's governance structure, significant gaps in policy, structures and procedures, and breaches by the College of its own quality assurance management procedures.

Expectation: Not met

Level of risk: Serious

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

3.10 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The Expectation is not met and with a serious level of risk, which indicates ineffective operation of part of the governance structure, significant gaps in policy, structures and procedures, and breaches by the College of its own quality assurance management procedures.

3.11 The review team makes one new recommendation in this area: review and implement procedures to ensure all information, including existing material, is fit for purpose, accessible and trustworthy.

3.12 The review team repeats two recommendations from Parts A and B: develop and implement a clear and comprehensive set of academic regulations for Higher National provision and ensure this is made accessible to students; provide clear and consistent information to students on how to make an academic appeal including to the Office of the Independent Adjudicator.

3.13 There are no affirmations or good practice identified in this judgement area.

3.14 For most issues highlighted in Part C, the College has not recognised that it has major problems. Where the College has recognised weaknesses, the review team saw little evidence that policies, procedures and practice are sufficiently developed to address the issues.

3.15 The review team concludes that the quality of the information about learning opportunities at the College **does not meet** UK expectations.

4 Judgement: The enhancement of student learning opportunities

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

Findings

4.1 The University of Bedfordshire has full responsibility for assuring and enhancing the quality of learning opportunities for the BA Business Administration programme delivered at the College. For the HND programme, the College has responsibility for ensuring appropriate processes are in place to systematically improve the quality of provision. The Strategic Plan 2016-20 states the College's aspiration to provide excellent teaching and learning and to put the needs of students at the heart of planning. Strategic goals cover expansion of learning pedagogies, strengthening preparation for work, improving success among students with the greatest achievement gaps, optimisation of use of student success data to inform services and develop a highly qualified and skilled academic workforce. The College's quality enhancement cycle outlines its intention to make use of policies and committees that support assessment, programme delivery and students. Feedback from staff and students, and external reports, as well as scrutiny of teaching and learning resources, within a monitoring and review process, is described as being central to enabling interventions for improvement and reinforcement of good practice. The Quality Enhancement Team, comprising teaching staff, was approved at Academic Committee in May 2017 to gather information to be used to design and deliver enhancement activities. It reports to both the Management Committee and Academic Committee. The Academic Committee is chaired by the Principal and has ultimate authority at the College. It is responsible for quality assurance and for the endorsement of policies formulated for the enhancement of quality. These arrangements would enable the Expectation to be met.

4.2 The team evaluated the effectiveness of the College's approaches by examining documentary evidence including strategies, minutes of meetings, quality enhancement cycle, annual monitoring reports, and external reports. The team also held meetings with students and senior, teaching and support staff.

4.3 Good practice in teaching and learning is identified through peer and lesson observation processes and there is some evidence of dissemination of this at Programme Team meetings. The College's three-tier tutorial system has been revised into a four-tier approach that now includes the Quality Enhancement Team to identify and deliver optional quality enhancement activities in study skills. Students appreciated the range of sessions provided in the autumn term 2017 that included critical evaluation, academic writing and using online methods to conduct literature searches. The sessions were repeated at different times according to a planned timetable to accommodate the availability of students. Anecdotally, staff have noted an improvement in students' work as a direct result of the skills input but no formal evaluation of its impact has been undertaken. Staff have used student feedback to develop further the programme of future activities for 2018 to include sessions on paraphrasing and referencing. The team **affirms** the steps taken by the College to improve student achievement through the introduction of enhancement activities.

4.4 The College has also acted to improve employability by providing sessions on interview skills, job searching and writing curricula vitae. In addition, students have been able to make visits to companies and organisations, which they found beneficial and improved their understanding of how theoretical concepts relate with business in practice. The College has further plans to develop business skills through a 'You Are Hired' scheme involving business companies and industry personnel.

4.5 While the College has a range of quality assurance components, such as termly module evaluations, annual programme and module evaluation, peer and lesson observations, student feedback on educational trips, tutorials, quality enhancement activity, and data collection on enrolment, retention, and achievement, there is a lack of coherent collation of these elements to provide a comprehensive quality assurance overview. In addition, although there is a document entitled 'Pursuing Our Key Strategic Goals', which presents an action plan indicating progress in achieving these goals, information is largely qualitative and there is limited evidence of discussion of them at Academic Committee meetings. The lack of key performance indicators, clear presentation and discussion of quantitative data on retention, progression and achievement prevents a robust assessment of success and identification of opportunities for improvement in student achievement. These findings contribute to the recommendation in paragraph 2.56 that the College should strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement.

4.6 The weaknesses in data analysis and critical evaluation and ineffective strategic overview by the Academic Committee are compounded by confusion about where ultimate responsibility lies for quality assurance and enhancement between the Director of Studies and the Principal. These findings contribute to the recommendation in paragraph 1.7 that the College ensures appropriate governance arrangements are implemented to secure academic oversight and enable the College to meet its responsibilities for academic standards and the quality and enhancement of learning opportunities.

4.7 Although there is some evidence of deliberate steps being taken to enhance student learning opportunities, for example in the delivery of study and employability skills and dissemination of good practice, the team considers that there is over-reliance on the teaching staff, who form both the Programme Team and Quality Enhancement Team, to identify and implement improvement measures. In addition, the findings from paragraphs 4.5-4.6 indicate a need for Academic Committee to make more effective use of robust qualitative and quantitative data in the quality assurance process and be more proactive in delivering systematic, planned enhancement of student learning opportunities. The team therefore **recommends** that, by September 2018, the College develop and implement a strategic and systematic approach to enhancement.

4.8 The review team concludes that the College's arrangements for taking deliberate steps at provider level to improve the quality of students' learning opportunities are not satisfactory. The Expectation is not met due to a lack of clear oversight, leadership and proactivity by the Academic Committee and senior staff, and insufficiently robust, systematic and critical consideration of quantitative information at provider level. The level of risk is moderate because of weaknesses in the operation of academic governance and insufficient emphasis given to enhancing quality in the College's planning processes.

Expectation: Not met
Level of risk: Moderate

The enhancement of student learning opportunities: Summary of findings

4.9 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The Expectation is not met and with a moderate level of risk, which indicates weaknesses in the operation of part of the governance structure, and insufficient emphasis given to enhancing quality in the College's planning processes.

4.10 The review team makes one new recommendation in this area: develop and implement a strategic and systematic approach to enhancement.

4.11 The review team repeats two recommendations from Parts A and B: ensure appropriate governance arrangements are implemented to secure academic oversight and enable the College to meet its responsibilities for academic standards and the quality and enhancement of learning opportunities; strengthen the critical evaluation, including the analysis of quantitative data, within annual monitoring to improve student learning opportunities and achievement.

4.12 The review team makes one new affirmation in this area: the steps taken to improve student achievement through the introduction of enhancement activities.

4.13 There are no features of good practice identified in this judgement area.

4.14 The review team concludes that the enhancement of student learning opportunities at the College **requires improvement to meet** UK expectations.

Glossary

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

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

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

Academic standards

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

Award

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

Awarding organisation

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

Blended learning

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

Credit(s)

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

Degree-awarding body

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

Distance learning

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

Dual award or double award

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

e-learning

See technology enhanced or enabled learning.

Enhancement

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

Expectations

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

Flexible and distributed learning

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

Framework

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

Framework for higher education qualifications

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

Good practice

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

Learning opportunities

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

Learning outcomes

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

Multiple awards

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

Operational definition

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

Programme (of study)

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

Programme specifications

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

Quality Code

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

Reference points

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

Self-evaluation document

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

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

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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