Quality Review Visit of Telford College of Arts and Technology

April 2017

Key findings

QAA's rounded judgements about Telford College of Arts and Technology

The QAA review team formed the following rounded judgements about the higher education provision at Telford College of Arts and Technology.

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

Areas for development

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

- further develop and articulate higher education specific governance structures and lines of reporting (Code of Governance)
- ensure that all draft and pilot higher education policies and procedures are fully implemented and that staff are appropriately trained in their use (Quality Code)
- further develop student representation on higher education committees at all levels to ensure that students are engaged as partners in the assurance of their educational experience (Code of Governance)
- develop training and strengthen support for student representatives (Code of Governance)
- further develop the central monitoring and analysis of student complaints in order to improve the student academic experience (Student protection measures, Code of Governance and Consumer protection obligations).

Specified improvements

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

and Technology:

- ensure that all Pearson programmes have definitive programme specifications (Quality Code)
- establish central reporting and monitoring of course changes to mitigate the risk of curriculum drift (Quality Code and Student protection measures)
- develop and implement a College process for the periodic review of Pearson courses (Quality Code)
- articulate, implement and disseminate an approach to the improvement of student learning opportunities (Quality Code)
- review terms and conditions for Pearson provision to ensure fairness and balance in relation to course closure and withdrawal (Consumer protection obligations)
- establish systems to ensure that prospective students have access to the information required to make informed decisions (Consumer protection obligations)
- develop and formalise mechanisms for course closure and withdrawal that include engagement with the student body (Student protection measures).

About this review

The review visit took place from 4 to 6 April 2017 and was conducted by a team of three reviewers, as follows:

- Ms Janet Faulkner
- Professor Christopher Clare
- Ms Amy Woodgate (student reviewer).

The overall aim of Quality Review Visit is to:

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

Quality Review Visit is designed to:

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

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

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

About Telford College of Arts and Technology

Telford College of Arts and Technology (the College) is a medium sized further education college based at a campus on the outskirts of Telford in Shropshire. The College was established in 1892 and therefore has a long tradition of delivering education to the local community. The College has 239 higher education students of whom 138 are part-time.

The College's higher education provision is delivered on behalf of two awarding bodies, the University of Wolverhampton and the University of Worcester and one awarding organisation, Pearson. The provision includes Foundation Degrees and Higher National Diplomas and Certificates across seven subject areas: business; computing; engineering; sport; art and design; health and social care; and childcare.

Judgement area: Reliability and comparability of academic standards

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

1   The College has relationships with two awarding bodies, the University of Wolverhampton and the University of Worcester; and one awarding organisation, Pearson. These awarding partners have the primary responsibility for ensuring the alignment of programme and module learning outcomes with the FHEQ. There are clear responsibility checklists for each of these that indicate the division of responsibilities for the monitoring and maintenance of academic standards. These include the delineation of responsibility in terms of assessment, external examining/verifying and assessment boards.

2   A revised draft process for the consideration of external examiner reports has been provided, which provides greater clarity on the journey of consideration of the reports. The external examiner reports themselves contain direct references to appropriate FHEQ learning outcomes, asking the external examiner to confirm them. External examiners are also required to acknowledge the comparability of standards to those in other institutions.

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

3   As part of a recent College review of higher education provision, new governance and management structures for higher education have been established and existing operations are in the process of formalisation. The review team acknowledge a high staff turnover, both at senior and academic levels, predominately due to factors outside of the control of the College. The previous interim Principal stepped down in December 2016 and at the time of the review visit the appointment of a permanent Principal was imminent. A dedicated Higher Education Quality Coordinator appointment was made in September 2016 with responsibility to improve the visibility of higher education operations and policies as distinct from further education. A Deputy Principal for Quality and Standards has also been appointed with ultimate responsibility for higher education, to whom the Higher Education Quality Coordinator reports. Since this latter appointment, new policies have been developed, although predominately in draft form, and two new higher education specific bodies have been established: the Higher Education Management meeting (HEM) and a higher education subcommittee of the Quality and Standards Committee (QSC). Responsibility for higher education operations within the College falls to the Higher Education Quality Coordinator and Heads of School.

4   HEM is the governing body for all operational higher education matters, including course approval, and membership comprises of all Heads of School, the Higher Education Quality Coordinator and support service representatives. This was initially established as a weekly meeting and now meets fortnightly. This body's required minimum is the Higher Education Quality Coordinator (or deputy) and any two others, indicating that academic matters could be passed with limited scrutiny from academic leadership. There is a lack of clarity regarding the relationship between College committees; what is reported to whom, where ultimate responsibility lies to take forward actions and how this is communicated to the membership. Responsibility for equality and diversity reporting and monitoring is not currently identified. The new College-wide Equality and Diversity Policy includes requirement to report on attainment gaps and general equality analysis but does not indicate governing responsibility. Similarly, responsibility for approving course closures and withdrawals remains a gap in the College academic governance, where currently discussions are held

between the relevant Head of School and the Higher Education Quality Coordinator but not formally reported or monitored. This issue is dealt with under student protection measures in the next judgement area. The draft Higher Education Strategy and Student Engagement Strategy both include a risk register and risk score, documents which have been presented to the QSC, although not yet implemented.

5   The review team therefore advises the College to further develop and articulate higher education specific governance structures and lines of reporting, identifying this as an **area for development**.

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

6   There are clear lines of responsibility between the awarding bodies, Pearson and the College for setting and maintaining academic standards. For University approved programmes, the College follows the relevant awarding body's processes for programme approval and uses its documentation. This documentation states the aims and learning outcomes and refers to relevant external reference points.

7   The College uses the Pearson approval process for its Pearson provision. The College has a draft Higher Education Course Approval Process and draft Higher Education Course Planning and Validation Template. At present, this is being piloted with a new proposal for engineering provision, therefore it is not yet possible to comment on the effectiveness of this process. There was no evidence provided to demonstrate the process in use with the engineering proposal as this document had not been presented to any committees.

8   The College has definitive documentation for the University validated programmes but does not have these for Pearson programmes. The review team therefore recommends that the College ensure that all Pearson programmes have definitive programme specifications identifying this as a **specified improvement**.

9   The programme specifications for University validated programmes clearly map the assessment against learning outcomes. There is good use of external examiners with tracking of actions. The draft Higher Education External Examiner Reports Process has the potential to improve the monitoring and evaluation of this process but as this is a draft process the impact could not be seen.

10   The University validated programmes follow the periodic process set by the relevant body. At present there is only annual monitoring for Pearson programmes with no periodic review process. This issue is dealt with in the next judgement area.

11   At present there is no central monitoring of academic standards across higher education provision. This is carried out by individual schools. The terms of reference of the HEM meetings suggest that this body will have oversight of higher education within the College but only one set of minutes was provided, therefore it is not possible to state with confidence that this body is effective.

12   The Annual Course Evaluation reports and the Overall Annual Evaluation Report for Higher Education 2015-16 make minimal use of data in monitoring academic standards. The draft Higher Education Annual Course Evaluation and Review Process requires more detailed analysis and evaluation of statistics to monitor academic standards. The introduction of the Higher Education Quality Coordinator post and the embedding and implementation of the draft policies and procedures have the potential to enhance the oversight of academic standards.

13   The review team noted the significant number of draft or pilot policies, processes and procedures that feature in the provider submission. From discussions with staff, it was not clear the extent to which these have been implemented, are understood and operated fully by staff. The review team identified an **area for development** and advises the College to ensure that all draft and pilot higher education policies and procedures are fully implemented and that staff are appropriately trained in their use.

14   There is no central monitoring of programme modifications. The HEM meeting details modifications, proposals and withdrawals but there is no evidence of discussion or tracking of modifications.

15   The review team therefore recommends that the College should establish central reporting and monitoring of course changes to mitigate the risk of curriculum drift identifying this as a **specified improvement**.

Rounded judgement

16   The academic standards of higher education courses are set by the awarding bodies and awarding organisation and managed through established mechanisms. New governance and management structures for higher education are in the process of formalisation and new policies have been developed, although these were predominately in draft form at the time of the review visit. There were no processes in place for the central monitoring of course changes.

17   The review team identified two specified improvements in this area which demonstrate weaknesses in the College's approach to the baseline regulatory requirements. The review team therefore recommend the establishment of central reporting and monitoring of course changes to mitigate the risk of curriculum drift and that all Pearson programmes have definitive programme specifications. The review team consider that the College may not be fully aware of the significance of these issues and that over time without action they could lead to a serious problem.

18   In addition, the review team identified two areas for development which relate to the further development and articulation of specific higher education governance structures and lines of reporting; and ensuring that all draft and pilot higher education policies and procedures are fully implemented and that staff are appropriately trained in their use. The review team recognise that the need for action has been acknowledged by the College but considers that the plans the College presents for addressing these issues are not fully embedded within operational planning.

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

Judgement area: Quality of the student academic experience

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

20   There are detailed responsibility checklists for the two awarding bodies and organisation that indicate the divisions of responsibilities for the management of the student academic experience.

21   The College has standard procedures for admission across its higher education courses. These are articulated in policy documents which are available to all staff undertaking an admissions tutor role. There is also an Addendum Policy for Recruitment, Selection and Admissions to Higher Education that aligns with the expectations of the Quality Code.

22   All staff delivering higher education qualifications are required to have qualifications above the level at which they are teaching and have, or be taking, a teaching qualification. There is a College continuing professional development (CPD) Policy that covers subject-based and pedagogic development. The policy refers to a Staff Appraisal Policy. Members of staff confirmed that they receive regular appraisals that are informed by teaching observation and take account of student feedback. The appraisals inform staff development for individuals and staff were able to provide various examples of staff development that they had undertaken. There is also a College CPD event each Wednesday where topics specific to higher education staff are presented.

23   The draft Higher Education Annual Course Evaluation and Review Process specifically addresses resources including library, information technology and workshops. Course teams also liaise with staff from the Learner Resource Hub over the provision of library support for their courses. Although the new process has yet to be fully embedded, staff were able to provide a number of examples where, as a result of student or employer feedback, they were able to successfully submit bids for resources to senior management.

24   Students are supported by course tutors for academic and pastoral issues. This includes issues related to specific learning needs as well as general academic support. Students are encouraged by the College to take ownership of, and make the appropriate contact with tutors to ensure that this happens. In addition, every student is allocated a personal tutor, who acts as a main point of contact for all levels of support. This role involves signposting, where necessary, to more general support services, through the dedicated learner support centre. Staff met by the review team confirmed the operation of a personal tutoring system backed up by central learner support. Students confirmed the effectiveness of the personal tutoring system.

25   Assessments are designed in collaboration with the awarding bodies based on the course and module specifications and learning outcomes. The assessments are moderated through dialogue between the teaching team, internal moderators and partner providers based on feedback from students, challenges identified within previous marking, and the need for continual reflection and improvement. The College has a rigorous internal verification system for assessments, which is augmented by systems of external examining/verification.

26   There is a revised draft process for the consideration of external examiner reports. This provides greater clarity on the journey of consideration of the reports. The external examiner reports contain direct references to appropriate aspects of the quality of the student learning opportunities. There is evidence of the consideration of external examiner

reports through both current annual reports, and through the proposed draft Higher Education Annual Course Evaluation and Review Process. Students are to be given access to external examiner reports through the VLE. Staff confirmed the process for dealing with the reports was as presented in the College submission and examples were given of specific issues that had been addressed.

27   The draft Higher Education Annual Course Evaluation and Review Process requires the completion of sections relating to the quality of student learning opportunities. However, the processes currently in use for the annual monitoring of courses also require consideration of student feedback and external examiner/verifier reports. The current Annual Course Evaluation reports also contain details of retention and progression data but there is no evidence of its analysis or detailed consideration by College committees. A summary of the Course Annual Reports is produced and a report is presented to Senior Leadership Team meetings and to meetings of the QSC.

28   The College does not operate mandatory work placements for its higher education students. Many students undertake voluntary placements that can help supplement their assessments but the placement itself is not managed or assessed by the College.

29   The College has a system of student representation. Each course has student representatives and they meet as a group with the Higher Education Quality Coordinator. The Higher Education Quality Coordinator feeds any issues raised through to the HEM or the QSC as appropriate, as well as informing the course teams. The course representatives have the ability to call for a meeting with the course team, but such meetings are not routinely held. There is also a higher education student representative who has recently been appointed to the Board of Governors and the QSC. However, it is too early to assess the effectiveness of this representation. Students are not represented on any other higher education committee.

30   Although there is commentary in the College submission on the periodic review of courses undertaken by the University of Wolverhampton and University of Worcester, there is neither commentary nor evidence on how Pearson courses are subject to periodic review. Staff confirmed that there was no process for the periodic review of the Pearson courses. The review team therefore identifies a **specified improvement** and recommends the College develop and implement a College process for the periodic review of Pearson courses.

31   Students confirmed that the information that they received prior to joining their course accurately reflected the provision. Furthermore they stated that the on-course information, both in hardcopy and through the virtual learning environment (VLE) was accurate and current. Staff were able to describe a multi-stage approach to checking the accuracy and currency of information prior to publication. There were also procedures described for checking the information on the website and on the VLE.

32   Although the College describes approaches to improvement within its submission, and it appears in the responsibilities checklists it is not clear where the overall drivers for it are located within the management or deliberative structures. In particular, it is not clear how initiatives are integrated in a systematic and planned manner and how good practice is systematically identified and disseminated. There is little evidence of the College using the analysis of student data as a means of identifying areas for possible improvement of student learning opportunities. Although a number of examples of positive changes to the learning environment were given, resulting from concerns or from the identification of good practice, there was no mention of a College-wide planned and systematic approach. The review team consider that this demonstrates a weakness in the College's approach to this aspect of the baseline regulatory requirement, as the College may not be fully aware of the significance of

this issue and that over time without action it could lead to a serious problem. The review team therefore recommends the College articulate, implement and disseminate an approach to the improvement of student learning opportunities, identifying this as a **specified improvement**.

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

33   As previously outlined, the College has recently established a number of higher education specific committees and subgroups, however, student representation on these bodies is yet to fully materialise. A Higher Education Student Governor has recently been appointed, who sits on both Corporation and the QSC, but this student representation is not yet reflected formally in College reporting structures. Student membership does not exist on other academic bodies but a student representative may be invited to attend the HEM meetings when business pertains to higher education academic quality matters, however, this is yet to be enacted. There is a mismatch in perception relating to formal opportunities for student representatives to meet with course leaders. Staff indicated students were welcome to attend a formal meeting but do not take them up on the offer; while students representatives met by the review team were unaware of access to such a meeting. Informal meetings between students and course leaders occur regularly throughout taught sessions, developing a strong dialogue for emerging issues which are resolved promptly, albeit not reported on formally nor fed back to the class as a whole.

34   The review team therefore advises the College to further develop student representation on higher education committees at all levels to ensure students are engaged as partners in the assurance of their educational experience, identifying this as an **area for development**.

35   Student representatives are typically self-selected and receive no training upon appointment to outline College expectations or responsibilities of the role. All student representatives are invited to regular meetings with the Higher Education Quality Coordinator, who is responsible for following up any issues raised. The Higher Education Student Governor receives support from the Clerk of Corporation, who also represents the Student Governors' views on committees outside of their jurisdiction, but no formal training is offered to fulfil the role.

36   The review team advises the College to develop training and strengthen support for student representatives, identifying this as an **area for development**.

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

37   There is a consistent and transparent approach to admissions across all programmes. There are effective procedures in place to ensure the accuracy of such information and students stated that the information given prior to entry was accurate.

38   The review team found gaps in the provision of information to students. There are no programme specifications published on the website or the VLE; no terms and conditions published on the website; and on the course pages of the College website, there is no reference to awarding bodies or the awarding organisation.

39   Programme specifications for University courses are available through the respective University student VLEs. Students applying for a University validated course are required to agree to the terms and conditions upon acceptance. Students enrolling on a

Pearson course at the College agree to the conditions on the enrolment form and then as part of the Learning Agreement, however these terms and conditions are not published nor accessible prior to formal enrolment. The College terms and conditions allow the College '… to alter and or cancel the programme of courses if necessary' but there is no policy or procedure for course closure. The review team recommends that the College review terms and conditions for Pearson provision to ensure fairness and balance in relation to course closure and withdrawal identifying this as a **specified improvement**.

40   There are at present no effective procedures for ensuring the completeness of published information. The College indicate that this is going to be the responsibility of the Marketing and Public Information Manager. The review team recommends that the College establish systems to ensure that prospective students have access to the information required to make informed decisions identifying this as a **specified improvement**.

41   The College has a Complaints Procedure and has recently introduced a draft Higher Education Complaints and Academic Appeals Policy. The QSC has oversight of complaints. There is no separate analysis of higher education complaints but this is proposed under the new policy. Informal complaints and issues are dealt with at local level within course teams and curriculum schools but there is no central monitoring of this. This issue will be addressed in the next section.

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

42   There exists an informal process of course withdrawal whereby a decision is made between the relevant Head of School and Higher Education Coordinator after analysis of course data, such as retention and financial implications. Communication with each student affected by a course withdrawal is triggered once the decision to withdraw a course is made, however this is typically without prior student consultation. At present, there exists no written record of this process for staff reference. The same process applies for course closures, although typically these decisions are made in advance of offering the course to new applicants.

43   The review team recommends that the College develop and formalise mechanisms for course closure and withdrawal that include engagement with the student body, identifying this as a **specified improvement**.

44   The review team noted that the metrics on student satisfaction and retention for full- time students had indicated a downward trend. The team reviewed the evidence base presented and discussed this issue with the College. The College acknowledged that this issue related to two specific courses. In both cases, the College suspended recruitment, discussed the courses with relevant awarding bodies, and subsequently reviewed course entry requirements: demonstrating an awareness and constructive approach to a solution. The review team considers that the College has taken appropriate steps to address these specific issues.

45   College staff outlined that many course changes are triggered directly by student feedback, such as through module surveys and informal dialogue with the class. These issues are resolved promptly albeit with no formalised communication process back to the student body. Changes to courses are not reported on or monitored either at School-level or centrally. As a result of this lack of central oversight, there is a serious risk of curriculum drift and recurrent concerns going unnoticed. This issue has been addressed in a previous

section.

46   Combined further and higher education complaints are reported for information to the Senior Leadership Team and Corporation annually; with a narrative of student demographic differences provided within the report introduction. Beyond categorisation of complaints received, no further analysis is provided regarding the content, resolution status, or improvements implemented within the annual report template. Processes for reviewing higher and further education complaints separately are in the early stages of establishment. A new higher education specific policy is due to be passed by the Corporation and a separate higher education analysis was to be submitted to QSC in November 2017. Complaints pertaining to higher education issues are communicated through the Higher Education Office and are now stored separate to further education complaints to facilitate future reporting requirements. Where possible, complaints are resolved informally through close dialogue with students. While this is encouraging in principle, there exists no central or formal register for monitoring complaints, indicating a potential weakness in oversight for trend analysis and emerging, recurrent concerns, which could impact negatively on the student experience.

47   The review team therefore advises the College to further develop the central monitoring and analysis of student complaints in order to improve the student academic experience, identifying this as an **area for development**.

48   The number of appeals received by the College is low, with only one instance to date submitted and managed through the partner University's processes. Information regarding the College complaints and appeals process is made available to students through their course handbooks, however, students typically refer directly to their course leaders to raise concerns in the first instance. Should an appeal be submitted, College policy outlines that students will be provided with a written outcome including a time frame of their opportunity for appeal.

Rounded judgement

49   The review team makes five recommendations for specified improvements in this area. These relate to the development and implementation of a periodic review process for Pearson courses; the articulation, implementation and dissemination of an approach to improve student learning opportunities; a review of terms and conditions for Pearson provision to ensure fairness and balance in relation to course closure and withdrawal; establishing systems to ensure that prospective students have access to the information required to make informed decisions and the formalisation of mechanisms for course closure and withdrawal that include engagement with the student body.

50   The review team consider that the College has not demonstrated sufficient awareness of its responsibilities as a higher education provider for aligning with the baseline regulatory requirements. In addition, the College may not be fully aware of the significance of certain issues and the plans presented for addressing identified problems are underdeveloped and not fully embedded in the College's operational planning; therefore this could lead to a serious problem over time without action.

51   The review team also advises the College on three areas for development. These relate to engaging students as partners in the assurance of their educational experience; developing training and strengthening support for student representatives and further developing the central monitoring and analysis of student complaints to improve the student academic experience.

52   The review team concludes that there is limited confidence requiring specified

improvements before there can be confidence that the quality of the student academic experience meets baseline regulatory requirements.