Higher Education Review (Alternative Providers) of The College of Integrated Chinese Medicine

Partial review

October 2018

Contents

About this review

This is a report of a Partial Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at The College of Integrated Chinese Medicine (the College). The review took place on 2 October 2018 and was conducted by a team of two reviewers, as follows:

- Professor Simon Pallett
- Ms Sophie Elliott (student reviewer).

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.

This was a partial review following an original review undertaken in October 2017, which resulted in a published report. The QAA review team made judgements on two areas requiring improvement: the information provided about higher education provision and the enhancement of student learning opportunities.

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.

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.

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[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/reviewing-higher-education/types-of-review/higher-education-review.

Key findings

Judgements

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

- The quality of the provider's information about learning opportunities **meets** UK expectations.
- The enhancement of student learning opportunities **meets** UK expectations.

Good practice

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

- The responsiveness of the College to issues raised by students both formally and informally, which leads to the identification of opportunities for enhancement (Enhancement).

Recommendations

The QAA review team did not make any recommendations.

Affirmation of action being taken

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

- the steps being taken by the College to ensure that the Quality Assurance Committee identifies enhancement priorities from the review of all the sources of data and feedback available to it, in particular through the annual monitoring process (Enhancement).

About the provider

The College of Integrated Chinese Medicine (the College), based in Reading, was created in 1993. The College delivers a BSc (Hons) Acupuncture, which has been validated by Kingston University (the University) since February 2003. The course is also accredited by the British Acupuncture Accreditation Board (BAAB). Students graduating from the College gain their honours degree and a Licentiate in Acupuncture (Lic Ac).

The aim of the course is to teach in a safe, guided, high quality professional learning environment the two main styles of acupuncture employed in this country and for students to be able to integrate these styles into their subsequent treatment of patients.

There are currently 126 students studying on the course. The College has two intakes per year and students choose to follow either weekday or weekend modes of study. The course is delivered by 35 part-time academic members of staff, and there are four full-time and 14 part-time administrative members of staff.

The last QAA review was a Higher Education Review (Alternative Providers) (HER (AP)) that took place in October 2017 and resulted in one area of good practice and eight recommendations being identified.

The College has made good progress in addressing the eight recommendations from the HER (AP) 2017. All the recommendations with a deadline of February 2018 have been fully dealt with, although in one case action is still, for good reason, ongoing. The College responded to the recommendation to implement appropriate and proportionate due diligence procedures for each practitioner at which clinical observations take place by bringing all clinical observations into the in-house clinic as an interim measure. This meets the recommendation. However, the College and the students do not regard this as the best long-term solution and work is in progress to identify a number of practitioners where, following appropriate due diligence, external observations could take place.

On the recommendations with a deadline of September 2018 good progress has been made on three and one is complete. The recommendation that the requirement for students to demonstrate fitness to practise in order to be awarded a degree is waiting sign off by the validating university, although it has agreed to the principle of an alternative exit award. The students the team met were very clear about the issue of fitness to practise and the consequences of not demonstrating it. Steps have been taken to help teaching staff become aware of current developments in student learning and assessment in higher education, but it will inevitably take time for these to work through. Significant actions have been taken to develop a strategic approach to the enhancement of learning opportunities, but as the report below shows further work on this issue is still needed.

Explanation of findings

This section explains the review findings in greater detail.

1   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

1.1   The College delegates the responsibility for ensuring that the information that it provides is trustworthy and fit for purpose to the Quality Assurance Committee (QAC), with the Marketing Committee contributing to the content of public-facing information. The committee has oversight of public-facing information, including the responsibility for the accuracy, completeness and fitness of information provided to applicants and students. The committee is also responsible for the review of student evaluations, National Student Survey (NSS) and Destination of Leavers from Higher Education (DLHE) data, and for using information as part of the quality improvement process.

1.2   In principle this responsibility, process and associated policies should allow the Expectation relating to information about higher education provision to be met. In order to test this the review team read documentation and evidence provided by the College, studied the College website and virtual learning environment (VLE), and met students and staff.

1.3   To ensure that all stakeholders have a clear understanding of its profile, the College publishes information on its website, locating the College in the broader contexts of UK and international higher education. The website sets out details of the programmes and qualifications offered, details of accreditation, and an introduction to the two clinics run at the College. The website contains key policies and procedures including terms and conditions, admissions, complaints, fitness to practise, fees, and data protection.

1.4   Students are provided with a detailed Student Handbook and a Clinical Handbook, both of which provide a range of information designed to support students in becoming successful independent learners. The students the review team met indicated that they received the Student Handbook at the start of the year, which allowed them to look ahead and therefore plan accordingly.

1.5   The College follows Kingston University's approach and guidelines for the Accreditation of Prior Learning Policy (APL). The APL Policy states that the College will notify Kingston University's liaison officer who is responsible for ensuring that any prior learning complies with the University regulations and will, in conjunction with the College, monitor the impact on assessment outcomes for such students.

1.6   Students accepted on to the course are given relevant information, including a timetable, address and phone number of the regional tutor in their area, copies of course materials, assessment calendar, an enrolment agreement, a Student Handbook, and an invoice for fees.

1.7   The provider makes the information received from approved external examiners available to staff and students. This information is in the form of an annual report, which is incorporated into programme action plans, distributed to staff and made available to students via the VLE, ensuring that all stakeholders are aware of the judgements surrounding the appropriateness of the learning outcomes for students, the quality and fairness of assessments, and the comparability of standards of the College's programmes, compared with the national standard.

1.8   Information is provided to students about the Staff-Student Consultative Committee and the role of student representatives through a briefing session by the Dean, who chairs the Staff-Student Consultative Committee, and through information from the Joint Principal, chair of the QAC. Student representatives also receive guidance notes detailing their responsibilities and a description of the role, which is also provided within their Student Handbook. The Staff-Student Consultative meetings are minuted. The records are distributed to staff and students and discussed at the QAC.

1.9   The College has responded to the previous QAA report by clarifying that the turnaround time for feedback on assessments is 20 working days from the point of submission to the feedback being received. This is now clearly articulated in all the relevant documentation and students described the assessment process as open and transparent.

1.10   The College has worked with Kingston University to develop the VLE (Canvas), thus ensuring that information is accessible to students online, and meeting the requirements of the 2017 HER (AP) action plan. Students the review team met described a morning's introduction to the VLE and found the information contained on it to be useful. While there are a number of outstanding areas still to be actioned, as stated in the self-evaluation document, including: the discussion area for staff; timetable area links to be put in place (as requested on previous student feedback); and an assessment area, the review team found that the development of the VLE has made good progress and is receiving very positive feedback from students.

1.11   The review team found that the College has clear processes and policies in place that allow the Expectation to be met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

The quality of information about learning opportunities: Summary of findings

1.12   In reaching its judgement the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

1.13   The review team identified that information produced by the College is fit for purpose and that students find the information to be useful and accessible. In addition, the College is striving to improve the information it provides with its current focus on the development of the VLE, and an accompanying aim to reduce information in paper form.

1.14   Responsibility for the oversight of information is in place in order to ensure the continued accuracy of published information.

1.15   The Expectation in this area is met and the associated level of risk is low.

1.16   The review team concludes that the quality of the information about learning opportunities at the provider **meets** UK expectations.

2 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

2.1   The College's aim according to the self-evaluation document is 'to continuously improve our teaching, learning and assessment through effective quality assurance and enhancement processes'. Furthermore, the College recognises that in the past its approach was not always sufficiently formalised nor could it evidence its approach. To that end it has set up a Quality Assurance Committee (QAC), which is responsible for enhancement, and drawn up a Quality Assurance and Enhancement (QAE) Handbook to guide staff on the procedures they need to be familiar with and to be used as part of staff induction. The handbook has been sent to all staff and is available on the VLE.

2.2   In addition, the College has long used the validating university's annual monitoring process, based on module enhancement plans, which feed into a course enhancement plan that in turn goes through the QAC and the Board of Studies before being presented to the validating university for review. It also involves the drawing up of an action plan, the implementation of which is monitored by the validating university. The self-evaluation document states that 'we see our programme monitoring as being the starting point for the process of continuous improvement that we are implementing across our course'.

2.3   In principle, these processes would allow the Expectation to be met.

2.4   The review team used the self-evaluation document, the student submission and the evidence provided by the College, in conjunction with meetings with staff and students, to determine whether the Expectation is met.

2.5   The changes made in creating the QAC and producing a QAE Handbook were very recent at the date of the review, with the consequence that QAC had met once. This limits the number of completed projects that can reasonably be expected to have been completed; therefore, the review team had to explore future plans with College staff to reach its judgement.

2.6   There is evidence of systematic enhancement taking place in one particular area. The approach taken to staff development in the past year provides a strong example of the College taking deliberate steps to enhance its provision in response to the feedback from the HER (AP) 2017. Staff development and training is the responsibility of the Executive Committee and implementation is led by the Academic Director and the Project Administrator. A Staff Development Policy has been created that sets out responsibilities, aims and procedures. Staff told the review team that they identified staff development as a strategic priority and decided to focus on existing staff, rather than new starters, because staff turnover at the College is very low and there are few new starters. The College therefore introduced a new system of annual review under which staff reflect on their performance, identify their development needs and have their teaching observed; the procedure applies to all teaching staff. It is intended that the Academic Director will review all annual reviews and use them to identify topics for the three staff development days each year and identify priorities for the staff training budget, thus using the collective output of the process to enhance provision. In addition to this, staff are encouraged to observe others teach for their own development and there are opportunities to observe staff at the validating University and to be observed by them planned for autumn 2018.

2.7   The Teacher Handbook has been revised to provide more information on learning and teaching and covers a wide range of topics including the opportunities for staff development. It has been sent to all staff and is available on the VLE. Staff are supported to attend events put on by the validating university and the BAAB. As well as this, some members of staff will be supported to gain fellowship of the HEA, which addresses the recommendation from the HER (AP) 2017 to ensure staff develop a continuing awareness of current developments in learning and assessment in higher education. The College also holds three staff development days each year, which have a strong focus on teaching and learning, and provide a good platform for programme leaders to review the programme and develop plans for change. It has also introduced mentoring for new staff and provided guidance on the role of the mentor. There is also a systematic induction process for new staff.

2.8   It is clear from the meetings with staff and students and other evidence, NSS results and the student submission that the College has an excellent and consistent record in acting upon issues raised by students. This applies to issues raised both informally and through formal processes. Students the team met were full of praise for the speed and quality of the responses from staff, who were found to be unfailingly helpful. The team, therefore, commends as **good practice** the responsiveness of the College to issues raised by students, both formally and informally, which leads to the identification of opportunities for enhancement.

2.9   The review team found the staff to be very student focused and reactive to issues raised by students, as evidenced in the identification of good practice, and the review team acknowledge that in response to the 2017 HER (AP) the College has demonstrated deliberate and strategic enhancement in its prioritisation of staff development. However, staff demonstrated low levels of understanding of enhancement as a deliberate strategy driven by senior managers and College-level committees. Staff told the review team that the plan is that, in future, QAC, once it is well-established, will identify areas for enhancement from all the feedback it receives from staff, students and external examiners and bodies, and through annual monitoring, and noted that these themes were likely to change over time.

2.10   The new QAE Handbook, has a significant section on annual monitoring, and the self-evaluation document describes the key importance of annual monitoring. However, current staff awareness of the process and how it contributes to enhancement was low and enhancement was seen more as an individual responsibility linked to the new annual review process (annual appraisal process). At present, although staff are encouraged to present their learning from external training and development opportunities, the annual monitoring process does not appear to be fully used to identify and share good practice.

2.11   The review team therefore **affirms** the steps being taken by the College to ensure that the Quality Assurance Committee identifies enhancement priorities from the review of all the sources of data and feedback available to it, in particular through the annual monitoring process.

2.12   The team's judgement is that the Expectation is met, as there is evidence of a new strategic approach being developed and of one effective enhancement theme having been identified with an action plan, which is in the process of being delivered. However, there are still some weaknesses in the College staff's understanding of what this expectation entails, and in presenting their enhancement activity in a strategic light. There is also a weakness in the College staff's understanding of the importance of the annual monitoring process and its key role in driving enhancement. Therefore, the level of risk is assessed as moderate.

Expectation: Met
Level of risk: Moderate

The enhancement of student learning opportunities: Summary of findings

2.13   In reaching its judgement the review team matched its findings against the criteria specified in Annex 2 of the published handbook.

2.14   The College has put in place policies and procedures to support the instigation of a strategic approach to enhancement which the review team acknowledges are at the start of their implementation. The review team was able to identify one strong example of strategic enhancement already well underway.

2.15   In considering the Enhancement Expectation the review team identified an area of good practice and an affirmation.

2.16   The Expectation in this area is met and the associated level of risk is moderate.

2.17   The review team concludes that the enhancement of student learning opportunities at the provider **meets** 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](#).

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/Glossary.

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.