

Gateway Quality Review: Wales Union Foundation (Union School of Theology)

May 2022

Key findings

QAA's judgements about Union Foundation

The QAA review team formed the following judgements about the higher education provision at Union Foundation:

- There can be confidence that academic standards are reliable, meet UK requirements, and are reasonably comparable.
- There can be confidence that the quality of the student academic experience meets relevant 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 Union School of Theology. The review team advises Union School of Theology to:

- 1 complete and implement the new alumni survey to improve information in order to better understand the academic and professional outcomes of students
- 2 further strengthen induction and communication with student representatives to ensure they can fulfil the role effectively.

Specified improvements

The review team identified no **specified improvements** that relate to matters that are already putting, or have the potential to put, quality and/or standards at risk at Union School of Theology.

About this review

The review visit took place from 24 to 25 May 2022 and was conducted by a team of three reviewers, as follows:

- Dr John Deane
- Mrs Alison Jones
- Mr Matthew Kitching (Student Reviewer).

The overall aim of Gateway Quality Review: Wales is to:

• provide the Higher Education Funding Council for Wales with an expert judgement about the readiness of a provider to enter, or continue to operate within, the higher education sector.

Gateway Quality Review: Wales 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 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 Union Foundation

Union School of Theology (UST; the School) is for anyone who wants to grow both academically and spiritually - in their understanding of Christian Scripture, in their ministry skills, and in personal formation. UST has a residential campus in South Wales and 14 GDip Learning Communities (10 in the UK, two in the US, two in Europe) and four MTh Learning Communities (one in the UK, one in Canada, two in Europe).

UST offers a Graduate Diploma Theology, BA Theology and an Mth in Scripture and Theology, all with the Open University. UST also offers a PhD programme in partnership with the Vrije Universiteit Amsterdam (VU Amsterdam).

UST has a total of 179 students across all the awards offered with the Open University; GDip and BA Theology, with the majority (101) being on the MTh in Scripture and Theology. There are six students on the PhD programme. In full-time equivalent terms, UST has 102 students. UST has nine full-time and two part-time academic staff, 11 full-time administrative and professional services staff, and 14 adjunct faculty.

UST has recently completed a teach-out of its MTh Theology in a Scriptural Context with the University of Chester due to them withdrawing from all partnerships with private higher education providers.

Judgement area: Reliability and comparability of academic standards

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

1 The Open University (OU), as the awarding body, retains ultimate responsibility for ensuring alignment to the appropriate level of the FHEQ and for considering subject benchmarks and other relevant frameworks. UST understands its responsibilities for setting and/or maintaining standards across all sites of delivery and effectively discharges its responsibilities through its academic governance structures. It works with its awarding body in the approval, monitoring and review of its higher education programmes, that includes representation from the awarding body on its Academic Board. The review team found that UST's adherence to the policies and regulations of its awarding body ensures that programmes are consistently aligned with the FHEQ and relevant Subject Benchmark Statements.

The Credit and Qualifications Framework for Wales (CQFW)

2 No explicit reference to the *Credit and Qualifications Framework for Wales* (CQFW) has been made with the programme documentation to indicate how alignment was achieved and how UST facilitated both credit accumulation and transfer in the context of the Framework. However, UST advised that programmes had been structured in line with the CQFW and staff were made aware of updates to ensure programmes remained consistent to it.

The Core and Common Practices of the UK Quality Code for Higher Education (the Quality Code)

Core practice: The provider ensures that the threshold standards for its qualifications are consistent with the relevant national qualifications frameworks.

3 Through its academic governance structures, UST adheres to the quality assurance procedures and regulations for validated awards of the Open University. All new and revised programme proposals are scrutinised by the Quality Assurance Committee and Academic Board prior to submission to the awarding body for final approval. All institutional policies are reviewed on a three-yearly cycle to ensure that they remain fit-for-purpose and a review of its mapping of policies and procedures against the Quality Code is regularly undertaken.

4 UST's policies for assessment, marking and recognition of prior learning set out detailed arrangements that test whether students have achieved the academic standards in line with the requirements of its awarding body. UST Progress Boards consider the academic performance of students and have effective oversight of attendance monitoring, highlighting any areas of concern. The Board of Examiners responds to feedback provided in external examiner reports and takes appropriate consideration of marks and performance of progressing students, prior to making recommendations for awards to its awarding body. Students confirmed they were aware of the assessment requirements, learning outcomes and marking criteria, and commented positively on the support received in completing assessments in order for them to achieve. The review team concluded that UST's adherence to its awarding body's regulations and requirements and mapping to the Quality Code ensures that the threshold standard for its qualifications remain consistent with relevant national qualifications frameworks.

Core practice: The provider ensures that students who are awarded qualifications have the opportunity to achieve standards beyond the threshold level that are reasonably comparable with those achieved in other UK providers.

5 UST programmes are approved and reviewed through the quality assurance processes of its awarding body which ensures that they are positioned at the appropriate level of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ). Programme information articulates the relevant learning outcomes to be achieved at each level which are mapped against assessment criteria. Level-related marking criteria reflect the FHEQ and comply with the regulations of the awarding body.

6 UST external examiners comment in their annual reports on whether the standards set are appropriate for the award, or award element, by reference to any agreed subject benchmarks, qualifications framework, programme specification or other relevant information.

Core practice: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

7 UST Learning Communities that deliver programmes by flexible and distributed learning are approved by UST's Academic Board that includes representation from the awarding body. UST retains responsibility for all teaching and assessment; a UST link tutor is appointed and supported by lead mentors selected within the Learning Communities to facilitate learning. A detailed checklist for Learning Communities, including facilities and learning opportunities, is reviewed by the OU academic reviewer. A Learning Communities Review Protocol sets out requirements of link tutors and monitoring requirements that include an annual report. Since 2020, UST has undertaken online observations of Learning Communities every year to check on standards.

8 Placements are conducted in partnership with local placement providers, many of whom are local churches, which are risk assessed. The Pastoral Dean maintains oversight of placement supervision and assessment, and all supervisors are inducted and trained. Students confirmed that they were well supported while on placements which were structured to ensure their relevance to expected future employment and reflected their career aspirations. An interview with their placement supervisors and tutors enabled them to feed back to UST on their placement experience. The Review team concluded that UST, working closely with its awarding body, has effective arrangements in place to ensure that standards of the awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

Core practice: The provider uses external expertise, assessment and classification processes that are reliable, fair and transparent.

9 UST makes effective use of external reference points and draws upon independent and expert advice in the setting and maintenance of standards. It actively engages with external examiners, employers, industry representatives and its awarding body, and responds to feedback within its quality assurance processes. Current external examiners include two from a higher education institution and one from a leading theological college. They are involved in the assessment and classification processes and provide feedback to confirm that quality and fairness exist in the assessment process. Comments made within annual reports are discussed and recorded by the Board of Examiners and awards are classified based on the OU regulations. The Open University's Academic Reviewer reads the external examiner reports, meets with UST students and completes an overview report. Membership of the Academic Board includes two external representatives - one from the church community and one from a higher education institution. The review team concluded that UST operates processes for assessment and classification that ensure student achievement is measured reliably, fairly and transparently.

Common practice: The provider reviews its Core practices for standards regularly and uses the outcomes to drive improvement and enhancement.

10 Through its academic governance structures, UST regularly reviews its Core practices for standards and uses the outcomes to drive improvement and enhancement. All institutional policies are reviewed on a three-yearly cycle to ensure that they remain fit-for-purpose and a review of its mapping of policies and procedures against the Quality Code is regularly undertaken through its academic governance structures. Revised policies and procedures are then published on the Cloud and the website. This included a revised Admissions Policy approved by Academic Board in October 2021 to update the Visa requirements for all non-EU applicants. However, the review team found that the published version had not been updated to reflect the amendment at the time of the visit. UST had also recently revised its programme committees to introduce a Joint Programme Committee, bringing together the monitoring arrangements for all programmes and partners. This has provided the benefit of reducing overlap and developing greater consistency across all its programme areas.

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

11 Alignment to the FHEQ is the responsibility of the awarding body (the Open University). UST aligns its programmes to the relevant Subject Benchmark Statements and adheres to the regulations and quality assurance procedures of the OU. Policies are reviewed on a three-yearly cycle and a review of its mapping of policies and procedures against the Quality Code is regularly undertaken. Achievement of academic standards is in line with the OU requirements. Academic performance is considered at Progress Boards. The external examiner reports are considered at the Board of Examiners. Students are aware of the assessment requirements and learning outcomes, and commented positively on the support received. Students undertake effective placement with local providers.

Judgement

12 The review team examined a wide range of documents, including programme specifications and validation approval records, which showed evidence of the School meeting the Expectations for standards of the UK Quality Code. This was agreed by external examiners and discussed at meetings with staff including a representative from the awarding body.

13 The review team concludes that 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 Core and Common practices of the UK Quality Code for Higher Education (the Quality Code)

Core practice: The provider has a reliable, fair and inclusive admissions system.

14 UST has an Admissions Policy which, it informed the team, was revised in May 2021 and again in October 2021. The policy is available on the School's website and is overseen by the Academic Board. The policy is comprehensive and, among other things, covers responsibilities, selection criteria, applications from mature and international students, and the appeal process. The team found that the revised October 2021 version of the Admissions Policy was not publicly available at the time of the review. The team was informed that this was due to staff illness and was rectified during the review visit. The team found that there is currently no systematic approach to monitor the ongoing accuracy of published information. However, students met by the team stated that they were given comprehensive information at application and any queries were quickly answered by staff. The School also has a Recognition of Prior Learning Policy and Admissions Complaints and Appeals Policy and Procedure.

15 The approach to recruitment, selection and admission is informed by its commitment to 'rigorous, biblical and accessible education, training and resources for churches worldwide'. Selection criteria include an applicant's prior academic performance, the potential to engage in academic theological study, English language proficiency and their understanding and acceptance of the School's aims and ethos. Individual programmes also have specific criteria - for instance, applicants to the MTh Theology are required to have a minimum of a lower second-class honours degree in theology or a related discipline.

16 Prospective students submit applications online, directly to UST. These are processed initially by the Admissions Department and then evaluated by the Programme Leader who invites students to attend an interview; both stages require the completion of a checklist. An overview spreadsheet of enquiries and applications is maintained. The spreadsheet includes the programme applied for, whether references (including church references) are required, interview dates and outcomes, and whether they have received relevant mailshots. Students informed the team that entry criteria were clear, and the team found the admissions process to be accessible and fair.

17 In September 2021, the MTh Programme Committee discussed admissions arrangements for non-standard entries to the programme and was in the process of composing an exam. During the review the institution informed the team that, owing to a change of institutional leadership, it had decided that this exam was unnecessary. Each application is considered individually to ensure fairness and inclusivity, and reflects the nature of many applicants.

Core practice: The provider designs and/or delivers high-quality courses.

18 UST follows OU procedures and undergoes a revalidation, that considers institutional and programme structures, including delivery, every five years. The School has significant scope, within the confines of the validation agreement, to contextualise the programme and ensure it aligns with its own ethos, needs and approach. Within this approach, the School develops new module specifications and engages in extensive dialogue with OU staff throughout the process. External examiners are also closely involved in considering any changes. Students spoke highly of the quality of courses delivered which they consider are meeting their learning needs.

19 A range of processes are in place to help monitor and maintain high-quality courses. These include peer observation, which is a requirement for all teaching staff, including adjunct faculty. Feedback on observations is provided and records kept. Staff described the peer observation process as supportive and beneficial, and provided examples where it had led to enhanced practice - for instance, rationalising the volume of material provided for online lectures and reinforcing the need to provide course information in accessible formats.

Core practice: The provider has sufficient appropriately qualified and skilled staff to deliver a high-quality academic experience.

20 UST employs staff who are experts in their discipline and engaged in the wider academic community being active as research supervisors, research fellows and visiting lecturers. All teaching faculty are expected to attain Fellowship of Advance HE (previously the Higher Education Academy) within two years of starting at the institution. The School has a Staff Development Policy in place which sets out key principles, the process for requesting staff development, and information concerning how this links to the annual staff review process. The School also produces an annual Staff Development Report detailing all activity carried out by staff in the previous year. To help assemble this report, staff, with the exception of adjunct faculty, are required to complete an appraisal form that identifies potential continuing professional development. The team viewed examples of completed appraisal forms that are at times completed in summary. Staff development is typically driven by individual members of staff rather than an explicit link between institutional strategy and any training and development undertaken by faculty. There is demonstrable evidence of staff publication, engaging in theological mission and presenting at academic conferences. The team was also provided with examples of CPD that had been supported by the institution - for example, funding to attend a government symposium on mental health and wellbeing.

Since the last review, the institution has recruited a Tutor for Women. This dedicated appointment is designed to provide one-to-one academic and pastoral support, and facility mutual support of students through small pastoral groups. Currently, 75% of female students at the institution have received support from the Tutor for Women. Female students reported high levels of satisfaction with the support that they receive from the Tutor for Women, including that the guidance they had received had helped confirm the appropriateness of the programme for students, as well as their vocation as a minister.

Core practice: The provider has sufficient and appropriate facilities, learning resources and student support services to deliver a high-quality academic experience.

The UST library has approximately 30,000 theological and related books, as well as special collections and Welsh language materials. The library benefits from an online catalogue of over 150 periodical subscriptions and a range of e-books and databases. Students are also able to access study spaces on campus. Students were positive about recent developments surrounding learning resources and the high-quality support provided by the School's new librarian, who was helping to highlight resources that students had been unaware were accessible. However, students also commented that more progress was needed to provide a greater range of electronic resources.

23 Since the last review, the School has added a third 'Zoom Room' on the Bridgend Campus. This provides students with the opportunity to attend online classes in

a purpose-built facility and still interact with students on campus. Students supported the benefits brought about by this resource, which allowed them to access a conducive online study environment, while also enabling important face-to-face interaction with their peers. Further to this, the School has introduced a single sign-on for online systems, including email, the library catalogue and virtual learning environment.

24 Students did raise some concern surrounding induction. These included gaps in information about when particular modules would be taught and over the effectiveness of online orientation compared to face-to-face. Where students attended the optional, in-person welcome conference, they and their peers considered they were better informed than those attending the online equivalent. The institution has commenced work to address this by enhancing induction through the development of videos for students.

Core practice: The provider actively engages students, individually and collectively, in the quality of their educational experience.

25 The Student President is responsible for initiating the Student Satisfaction Survey in the second semester. The survey gathers feedback relating to eight areas of activity: teaching, learning opportunities, assessment and feedback, academic support, organisation and management, learning resources, learning community and student voice. Anonymised feedback from the survey is considered by the Quality Assurance Committee and the Academic Board, with action incorporated into the Quality Action Plan.

In 2021-22, the School introduced an online module feedback system to replace their previous paper form which has improved response rates. The School has identified a range of thematic issues through module feedback including heavy reading loads, assumed knowledge, pastoral aspects of Preaching and Pastoral Course, and concerns surrounding learning outcomes on Children's Youth and Family Course. Staff recognised these issues and provided the team with examples as to how they were taking these actions forward for example, by reviewing and revising learning outcomes.

Core practice: The provider has fair and transparent procedures for handling complaints and appeals which are accessible to all students.

UST has a detailed and comprehensive Complaints Policy in place, which is available on the website and virtual learning environment. The policy sets out clear timescales, discusses data protection and confidentiality, and support arrangements for those wishing to submit a complaint. The policy also separates informal and formal complaints, and provides complainants with the opportunity to request a formal review. Grounds for formal review include being treated unfairly and the existence of material that could not be divulged at the time of the complaint. The Policy provides students with information about referring to the awarding body and/or the Office of the Independent Adjudicator. The School received one complaint, relating to the MTh programme in 2020-21. More generally, students confirmed that they knew where and how to find information pertaining to the complaints process.

28 UST has an Academic Appeals Policy and Procedure in place, which sets out the process for appealing module marks or final awards. The policy clearly distinguishes between complaints and appeals, addresses timescales for considering academic appeals, and makes explicit reference to inadmissible grounds for appeal. The School has one recent academic appeal relating to the GDip programme in this academic year, which was not upheld. Students attested that they knew how to find information about submitting an academic appeal, were it required.

Core practice: Where the provider offers research degrees, it delivers these in appropriate and supportive research environments.

UST has a Research Degree Committee in place, the terms of reference for which include providing a critical evaluation of progress - both teaching delivery and student reception - as well as highlighting and reporting quality control matters and making suggestions to be directed to the Academic Board. There is a PhD programme with the VU Amsterdam, which is out of scope for this review.

Core practice: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the academic experience is high-quality irrespective of where or how courses are delivered and who delivers them.

30 No provision is delivered by partners. Students on the BA programme undertake placements. The nature of placements is explained by the lecturer who takes responsibility and liaises with the supervising placement provider who completes a report which is included in assessment. Most placements take place with local churches and can lead to employment. Students stated that they felt well-prepared for placements.

Core practice: The provider supports all students to achieve successful academic and professional outcomes.

31 The School attracts a combination of students seeking to enter vocational careers allied to ministry, as well as students studying at different stages in their career and life with no interest to assume related employment. Students informed the team that the range of teaching and support is appropriate to help them achieve their desired academic and professional outcomes. Students provided a wide range of examples whereby soft skills are embedded in the curriculum - for example, ministry skills modules and skills for pastoral ministry. They also commented positively on the tight link between teaching content, self-learning and assessment - for example, the use of assessed sermons and reflective assessment in preaching and pastoral studies. Students and staff also praised the use of Learning Communities, which provide students with extensive time for peer learning and discussion.

32 UST makes limited use of monitoring data relating to academic and professional outcomes including an alumni survey. The team, therefore, consider it an **area for development** to complete and implement the new alumni survey to improve information in order to better understand the academic and professional outcomes of students.

Common practice: The provider reviews its Core practices for quality regularly and uses the outcomes to drive improvement and enhancement.

The UST Quality Assurance Committee (QAC) has a responsibility to monitor, critically evaluate and design improvements as needed to the quality of their processes. As such, QAC is responsible for ensuring adherence to regulatory frameworks and forming the responses to external agencies and the awarding body. UST introduced in 2022 a Joint Programmes Committee (JPC), bringing together the previously separate committees for each programme, which has enhanced the School's ability to identify common thematic issues and disseminate good practice. The institution informed the team that it considers the chief benefit of the new JPC to be the efficiencies it has delivered.

34 Under its validation agreement with the Open University, UST are required to appoint a Link Tutor, who liaises with the OU Lead Mentor to ensure all agreed protocols are

followed. An annual Learning Community Review is also conducted to monitor delivery of the programme. The team found that a clear quality assurance cycle is in place and well understood by staff across the institution although some actions do not appear to be signed off in a clear and timely manner.

Common practice: The provider's approach to managing quality takes account of external expertise.

35 UST includes external representation on key committees, including the Academic Board and Quality Assurance Committee. The institution also has external examiners in place for its programmes. External examiner reports viewed by the team confirm that standards are appropriate for the awards and meet relevant external benchmarks. The reports also confirm that students' work is of an appropriate quality and assessment demonstrates that they meet the learning outcomes. Upon receipt, external examiner reports are considered by programme teams and responses overseen by the Examination Board. They are also subject to scrutiny by the Open University. Currently, there is no student involvement in considering feedback from external examiners and examiner reports are not routinely shared with students but are available on the Cloud.

Common practice: The provider engages students individually and collectively in the development, assurance and enhancement of the quality of their educational experience.

36 A formal system of student representation is in place with the election of a Student President and a series of student representatives at programme level. The President receives an induction from the Compliance and Reporting Officer. Currently, however, neither the President nor student representatives receive any additional internal training and/or further support materials from the OU, or their Students' Association. UST recognise the need to strengthen support for elected student representatives. Data from the latest student survey indicates that 70% of students agreed that they had the right opportunities to provide feedback on their course, 60% agreed staff value student views and opinions about the course, and 72% consider feedback has been acted on effectively. However, only 35% agree that student representatives effectively represent the interests of the student body. Staff and students identified several reasons for this, including representatives not being informed that they had been selected for the role and poor communication. The team confirmed that collaborative work has already commenced to improve this aspect of the institution's work. The review team, therefore, consider it an **area for development** to further strengthen induction and communication with student representatives to ensure they can fulfil the role effectively.

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

37 UST has clear and fair processes for admissions which include consideration of recognition of prior learning and non-standard applications which reflects the nature of their students. Programmes are designed to offer rigorous biblical and theological study to prepare students for ministry worldwide in line with awarding body guidelines. Academic staff are well-qualified, engaging in research and with the wider academic community, many also working in ministry. There is close crossover with support staff to meet pastoral and academic needs of students. The process for monitoring and reviewing the student experience has recently been improved as confirmed by awarding body and external examiner reports. Students' views are considered and acted upon, and they expressed overall satisfaction with their experience.

Judgement

38 The review team examined all evidence provided and had meetings with senior staff, academic and support staff, and current students. UST programmes are aligned to OU regulations and policies are in place to ensure academic standards and the quality of the student experience. The areas for development would enhance the processes already in place.

39 The review team concludes that there can be **confidence** that the quality of the student academic experience meets relevant baseline regulatory requirements.

Commentary: Welsh Language Standards

40 All Union School of Theology courses are validated by the Open University a provider based in England. As such, it was confirmed by QAA via discussions with HEFCW prior to the review, that UST was not expected to conform to Welsh Language Standards in the running of their programmes. This was not a requirement of the Open University as the validating partner of UST. The UST website thus has no information in the Welsh Language.

41 UST outlined that they had no requests from students either to be taught in Welsh or submit work in Welsh. Students confirmed that they had not requested to either submit their work in Welsh or be taught by a Welsh speaker.

42 UST has no strategy of policy for the Welsh language. UST did outline plans to establish a Daniel Rowland Centre to enhance the interaction with Welsh-speaking churches. UST Library has a Welsh reading room. UST is in discussion about appointing Welsh-speaking adjunct faculty to offer mentoring in Welsh on the Graduate Diploma in Theology.

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