



# Higher Education Review (Alternative Providers) of Union School of Theology

April 2017

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## About this review

This is a report of a Higher Education Review (Alternative Providers) conducted by the Quality Assurance Agency for Higher Education (QAA) at Union School of Theology. The review took place from 3 to 5 April 2017 and was conducted by a team of three reviewers, as follows:

- Mrs Sarah d'Ambrumenil
- Dr Mark Lyne
- Professor Anthony Whitehouse.

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)<sup>1</sup> setting out what all UK higher education providers expect of themselves and of each other, and what the general public can therefore expect of them.

In Higher Education Review (Alternative Providers) the QAA review team:

- makes judgements on
  - the setting and maintenance of academic standards
  - the quality of student learning opportunities
  - the information provided about higher education provision
  - the enhancement of student learning opportunities
- makes recommendations
- identifies features of good practice
- affirms action that the provider is taking or plans to take.

A check is also made on the provider's financial sustainability, management and governance (FSMG) with the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure.

The QAA website gives more information [about QAA](#)<sup>2</sup> and explains the method for [Higher Education Review \(Alternative Providers\)](#).<sup>3</sup> For an explanation of terms see the glossary at the end of this report.

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<sup>1</sup> The UK Quality Code for Higher Education is published at: [www.qaa.ac.uk/quality-code](http://www.qaa.ac.uk/quality-code).

<sup>2</sup> QAA website: [www.qaa.ac.uk](http://www.qaa.ac.uk).

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

## Key findings

### Judgements

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

- The maintenance of the academic standards of awards offered on behalf of degree-awarding bodies **meets** UK expectations.
- The quality of student learning opportunities **does not meet** UK expectations.
- The quality of the information about learning opportunities **does not meet** UK expectations.
- The enhancement of student learning opportunities **meets** UK expectations.

### Good practice

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

- The effective, local and accessible support provided to communities of distance learning students by Lead Mentors (Expectation B10).

### Recommendations

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

By July 2017:

- formalise and document the internal process for the design, development and approval of programmes (Expectations B1, A3.1)
- establish and implement an admissions policy which adheres to the principles of fair admission (Expectation B2)
- ensure that the complaints procedure does not seek to limit the grounds for an appeal against a decision of an assessment board (Expectation B9)
- ensure that information in Student Handbooks is aligned with guidance from the Competition and Markets Authority (Expectation C)
- provide public information about its provision which is fit for purpose, accessible and trustworthy (Expectation C).

By September 2017:

- clarify the terms of reference and the lines of reporting for key committees with responsibility for academic governance (Expectation A2.1)
- establish a sustainable and strategic approach to the selection and support of Learning Communities (Expectation B10)
- further develop, establish leadership of, and securely implement the strategy for enhancement (Enhancement).

### Affirmation of action being taken

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

- the steps being taken to establish an agreement with an awarding body (Expectation A3.1).

## **Financial sustainability, management and governance**

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

## About the provider

The Union School of Theology (the School) is a theological institution whose aims are to provide education and training to those in, or considering entering, Christian ministry. It offers undergraduate and postgraduate programmes intended to lead to the award of a Bachelor of Arts with Honours in Theology, a Graduate Diploma in Theology, a Master of Theology, and to Master of Philosophy/Doctor of Philosophy. The School currently has 31 students enrolled on undergraduate programmes, 27 on taught postgraduate programmes and five on research degree programmes.

Since 2010, the School has had an Organisational Agreement with the University of Chester (the University) allowing students who successfully complete degree programmes to receive an award of the University. In June 2016, the University gave notice that the Organisational Agreement would come to an end in August 2016, though the date of ending was later postponed to December 2016. The University has committed itself to ensuring that students already registered for an award of the University can complete their studies. Although the School has been making efforts to form a partnership with another degree-awarding body, it has not yet done so.

With a view to creating a wider appeal, and reflecting its mission to unite with the church in training church leaders, the School, formerly the Wales Evangelical School of Theology, adopted its present name in January 2016.

The most significant change since the previous review has been the development of the Graduate Diploma in Theology as an online distance learning programme, supported by the establishment of seven Learning Communities in the UK and beyond, intended to provide local support and fellowship for distance learning students.

The School regards its key challenges as being the establishment of an agreement with a degree-awarding body to enable it to continue offering validated degree programmes, and to increase student numbers on its undergraduate programme. Additionally, it aspires to expand its network of Learning Communities, to continue to develop strategic partnerships with organisations that may feed students into its programmes, and to improve its online platforms and digital resources.

The School's most recent review, the Review for Educational Oversight in April 2014, resulted in positive judgements in all judgement areas, and identified five features of good practice and six recommendations. The monitoring visit of April 2015 concluded that the School was making commendable progress with continuing to monitor, review and enhance its higher education provision.

## Explanation of findings

This section explains the review findings in greater detail.

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

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

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

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

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

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

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

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

#### **Findings**

1.1 The School's framework for its provision operates in accordance with the policies and procedures of the University, whose arrangements for programme design and development, approval, annual monitoring, periodic review and external examining are aligned with The Framework for Higher Education Qualifications in England, Wales and Northern Ireland (FHEQ), QAA's guidance on qualification characteristics, the Higher Education Framework for England: Guidance on Academic Credit Arrangements in Higher Education in England (2008) and any relevant Subject Benchmark Statements. Adherence to the University's policies would allow the Expectation to be met.

1.2 The review team tested the application of these policies at the School by scrutinising a range of documentation including programme specifications, records of course re-validation and modification, annual monitoring reports and external examiners' reports. The team also heard from academic staff regarding the use of relevant external reference points.

1.3 The programme specifications, which are submitted for approval on an annual basis, contain explicit reference to consideration by the School of the FHEQ, the Subject Benchmark Statement for Theology and Religious Studies 2014, and the credit framework in the design of its programmes. An example of a course modification approval form also showed appropriate use of the Subject Benchmark Statement.

1.4 External examiners' reports confirm that the standards being set and maintained are appropriate and consistent with the relevant sections of the Quality Code, FHEQ and Subject Benchmark Statements. The School's Annual Monitoring Report and the University's re-validation report also demonstrate that the School is making effective use of relevant external reference points.

1.5 At provider level, the School's Teaching and Learning Policy states that it is underpinned by the FHEQ and the Theology and Religious Studies Subject Benchmark Statement; academic staff confirmed that these were referred to on a routine basis.

1.6 Under the auspices of the validating University, the School has made thorough and effective use of the relevant external reference points in setting and maintaining the standards of its awards. The Expectation is met. The School has developed sufficient experience of working with these reference points for this to represent a low risk.

**Expectation: Met**  
**Level of risk: Low**

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

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

**Findings**

1.7 The academic frameworks and regulations of the validating University form the basis on which the School assures its academic standards. Module Assessment Boards and Awards/Progression Assessment Boards are run by the University in accordance with its policies. The governance structure of the School comprises the Academic Board, which takes responsibility for academic standards, the Research Committee, the Academic Strategic Meeting and the Quality Review Meeting. Collectively, the frameworks and regulations of the University and the School's committee structure have the potential to meet the Expectation.

1.8 The review team evaluated the effectiveness of these arrangements in practice through looking at the Regulations and Handbooks of the validating University, minutes of assessment boards, minutes of meetings of Academic Board and other School groups, and descriptions of the responsibilities of the various groups and their interactions. The team also discussed the School's governance arrangements with members of staff.

1.9 The terms of reference and the minutes of the Awards/Progression Board and of Module Assessment Boards demonstrate that credit and awards for modules and programmes delivered by the School are confirmed through a rigorous process, with which the School engages effectively. These arrangements were reviewed and affirmed by the re-validation of the School's programmes in 2016 and by the undergraduate Annual Monitoring Report for 2015-16.

1.10 The School's Academic Board, of which all full-time academic staff are members, meets weekly during term time and less frequently at other times, and meetings alternate between consideration of postgraduate and undergraduate issues. While the terms of reference of the Board affirm its responsibility for academic standards, quality assurance and enhancement, they express the Board's remit in terms which do not clearly establish its role or its level of authority, and which leave doubt as to its responsibility for academic strategy.

1.11 The Academic Dean provides a link between Academic Board and the Academic Strategy Meeting which meets when required, approximately four or five times per year, and acts as a platform for discussion of academic strategic matters by higher and middle management. Although terms of reference for this group were not available, its minutes show that it deals with a number of managerial issues such as the staffing of particular modules as well as with strategy.

1.12 The Quality Review Group was initially established to monitor progress against the action plan for the 2013 QAA Review for Educational Oversight. It has since continued as a group that meets twice a year to consider wider issues relating to quality of provision. It reports informally to Academic Board via the Quality Co-ordinator, but its terms of reference were not available.

1.13 The review team was satisfied that the groups operating in the School are collectively able to oversee the standards of its provision. However, scrutiny of the minutes of these groups, their terms of reference (where available), and descriptions of their remits



shows potential for overlap and lack of clarity in their responsibilities. The team **recommends** that the School should clarify the terms of reference and the lines of reporting for key committees with responsibility for academic governance.

1.14 The School implements the frameworks and regulations of the University and operates suitable academic governance structures. The Expectation is met. However, the lack of clarity about responsibilities within the governance structure, particularly at a time when the School may need to consider whether and how to adopt the regulations and quality assurance framework of a new validating partner, constitutes a moderate risk.

**Expectation: Met**

**Level of risk: Moderate**

**Expectation (A2.2): Degree-awarding bodies maintain a definitive record of each programme and qualification that they approve (and of subsequent changes to it) which constitutes the reference point for delivery and assessment of the programme, its monitoring and review, and for the provision of records of study to students and alumni.**

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

**Findings**

1.15 The School's definitive record for each programme is the programme specification, which is maintained by the University and is made available to students and staff at the School through the Student Handbook and Virtual Learning Environment (VLE). Staff of the School may propose changes to the programme specification using the University's processes.

1.16 Programme specifications have been created using the University's template, and changes made to the specification are required to be considered and agreed using the University's mechanisms. These processes would allow the Expectation to be met, ensuring that a single definitive record is maintained by the awarding body, with procedures in place to be able to update the definitive record.

1.17 The review team tested the expectation by considering examples of the definitive record and discussing with staff whether they were aware of their responsibilities and the processes to be followed for consideration of proposals to change the definitive record.

1.18 The process works effectively in practice, with staff from the School fully aware of the responsibilities that each of them holds.

1.19 The key responsibilities for the maintenance of the definitive record are held by the University. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

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

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

**Findings**

1.20 The Organisational Agreement with the University enabled the School to deliver programmes that had been validated and awarded by the University, until 31 December 2016. Programme agreements were provided and signed by the University for each validated programme. These agreements specify the expectations of each party including those for academic standards, programme management, communication and termination.

1.21 During the review period the School confirmed that it was in negotiation with a potential awarding body partner for the validation of programmes and to make awards.

1.22 The agreement with, and oversight by, the University enabled academic standards to be set at a level which met the UK threshold standard for the qualification and were in accordance with the University academic frameworks and regulations. The most recent programme revalidation by the University took place in February 2016 and resulted in successful outcomes for all of the School's programmes.

1.23 These arrangements allowed the Expectation to be met during the period of the Organisational Agreement with the University.

1.24 The review team scrutinised the evidence supplied, including the University's regulations, validation reports, programme agreements and specifications, and minutes of Academic Board. The team also held meetings with senior staff, academic staff, professional support staff and students.

1.25 The School is actively seeking a validation agreement for its current programmes with another degree-awarding body, and hopes to validate its existing programmes by September 2017. The review team heard that, should it fail to do so, it would consider instead a temporary validation by an overseas partner. The review team **affirms** the steps being taken to establish an agreement with an awarding body.

1.26 Under the Organisational Agreement with the University, responsibility for the design and development of programmes was shared with the University. The School's Academic Dean and Academic Board maintain strategic oversight of programme design and development, and take responsibility for programme specifications and for module descriptors. Nevertheless, the School has no internal written procedure for the design and development of programmes. The lack of a clear procedure supports the recommendation in Expectation B1 relating to the process for the design, development and approval of programmes.

1.27 Oversight by the University enables the Expectation to be met in respect of students currently registered for the University's awards. The lack of formal arrangements for the development of programmes, and of an agreement with an awarding body for the approval of programmes, constitute weaknesses in the School's academic governance: the level of risk is moderate.

**Expectation: Met**  
**Level of risk: Moderate**

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

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

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

**Findings**

1.28 The University is responsible for ensuring that credit and qualifications are awarded to students who successfully meet the programme learning outcomes. The University requires the School to set assessments together with marking schemes and to send these to the external examiner for approval. The School is also required to send samples of marked work to the external examiner and to respond to the external examiner's reports. These arrangements, during the period of the Organisational Approval with the University, are sufficient to meet the Expectation.

1.29 The team scrutinised the evidence supplied, including the Organisational Agreement with the University, Assessment Board minutes, external examiners' reports and responses, and obtained clarification at meetings with senior staff, academic staff, professional support staff and students.

1.30 External examiners are required to attend Module Assessment and Award Boards and to raise, with the University Vice-Chancellor, any matter of serious concern arising from the assessments which puts in jeopardy the standard of the award or the fair treatment of any individual student. External examiners' reports provide positive comments on assessment and on marking, and confirm that appropriate standards are achieved.

1.31 Module and Programme Leaders attend and participate in meetings of the University's Module Assessment Boards. The absence of external examiners from some meetings is mitigated by contact with the external examiner before outcomes are finalised.

1.32 During the period of oversight by the University, the School has applied the University assessment framework, which enables the achievement of learning outcomes to be appropriately demonstrated. The School's practices are aligned with the University's framework for oversight. The Expectation is met in respect of the provision validated by the University. The level of risk for this provision is low.

**Expectation: Met**  
**Level of risk: Low**

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

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

**Findings**

1.33 During the period of the Organisational Agreement with the University, the responsibility for monitoring and review of programmes is shared by the School and the University. The School follows the University's arrangements for annual monitoring and for periodic review of its programmes, and is responsible specifically for their ongoing monitoring. These arrangements would enable the Expectation to be met in respect of provision validated by the University.

1.34 The review team scrutinised documentation including the Organisational Agreement with the University, the University's Quality and Standards Manual, Annual Monitoring Reports and Periodic Review Reports, and held meetings with senior staff, teaching staff, professional support staff and students.

1.35 The School participated in the University's periodic review and revalidation of its provision in 2016, the outcome of which was indefinite approval for its named programmes.

1.36 The University requires Annual Monitoring Reports (AMR) to be completed using its standard templates, which require evaluation of each programme including consideration of external examiners' reports, student feedback and support, learning resources and progress made on the preceding year's action plan. Reports are expected to highlight areas of good practice and to set out an action plan for the year ahead.

1.37 The Academic Board discusses and approves the AMR before the report is considered by the University's Link Tutor and Head of Department. Although the AMR template includes provision for a response by the Link Tutor and the University Head of Subject, such responses are not consistently provided.

1.38 Student representatives have limited involvement in annual monitoring through attendance at formal meetings of the Undergraduate Programmes Board and Academic Board.

1.39 The School's practices are aligned with the University's framework for oversight. The Expectation is met in respect of the provision validated by the University. The level of risk for this provision is low.

**Expectation: Met**  
**Level of risk: Low**

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

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

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

**Findings**

1.40 The policies and procedures that are intended to ensure that external and independent expertise informs the setting, delivery and achievement of appropriate academic standards, are those of the University. In implementing these policies the School is also able to draw upon its links with the wider church and academic communities to further inform the development and delivery of its provision. These arrangements are fit to meet the Expectation.

1.41 In testing whether this Expectation has been met, the review team looked at relevant policies of the University including the Quality and Standards Manual, a report of the re-validation of programmes, external examiners' reports and course modification approval forms. The team also met with staff of the School.

1.42 The School has constant contact with the wider church community that it seeks to serve. These links, which include those with placement providers, the Learning Communities and other churches, are of particular value in providing ongoing feedback on programme design and development. Many of these links have in the past been relatively informal but nevertheless effective in, for instance, supporting the development of the School's Learning Communities. They are now becoming more formalised, for example through opportunities offered by the annual conference, through student placements and through Learning Communities, with the Academic Dean being the main point of contact.

1.43 The re-validation of the School's undergraduate and taught postgraduate provision was undertaken in 2016 by a panel that included two external advisers from other higher education institutions, who provided the panel with subject-specific expertise and an opportunity to ensure equivalence with provision elsewhere in the higher education sector at the same level. The panel also included three graduates from the School's programmes.

1.44 External examiners provide a key source of external feedback on the suitability of provision in terms of the assessment and achievement of learning outcomes (see also Expectation B7). Their reports consistently confirm that programme content is appropriate and that the academic standards within the School are equivalent to those found elsewhere in the sector. Feedback in their reports is itself informed by their involvement in the setting and grading of assessments and their attendance at assessment boards. Any proposals for course modification also require the recommendation for approval of the external examiners.

1.45 The review team concludes that the School's engagement of external, independent expertise in accordance with the requirements of the validating University, and its links with the wider church community, are effective in meeting the Expectation. The level of risk associated with this is low.

**Expectation: Met**  
**Level of risk: Low**

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

1.46 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. All Expectations for this judgement area are met with a low level of risk, with the exception of Expectations A2.1 and A3.1. Expectation A2.1 shows lack of clarity about responsibilities within the governance structure, and has a moderate level of risk. Expectation A3.1 contains shortcomings which constitute a weakness in the School's academic governance and also has a moderate level of risk.

1.47 There are no features of good practice relating to this judgement area.

1.48 There is a single recommendation in this judgement area, relating to the need to clarify the terms of reference and the lines of reporting for key committees with responsibility for academic governance.

1.49 The single affirmation in this judgement area relates to the steps being taken to establish an agreement with an awarding body.

1.50 The review team concludes that the maintenance of the academic standards of awards offered on behalf of degree-awarding bodies at the provider **meets** UK expectations.

## 2 Judgement: The quality of student learning opportunities

**Expectation (B1): Higher education providers, in discharging their responsibilities for setting and maintaining academic standards and assuring and enhancing the quality of learning opportunities, operate effective processes for the design, development and approval of programmes.**

### Quality Code, *Chapter B1: Programme Design, Development and Approval*

#### Findings

2.1 The School takes responsibility for programme design and development, and for preparing formal documentation required to meet University procedures in the form of programme specifications, which are submitted to the University's validation process. The University provides advice regarding Subject Benchmark Statements and the use of the Quality Code in programme design and development.

2.2 The Organisational Agreement and separate agreements for each programme define the responsibilities for the maintenance of academic standards. Each programme agreement confirms that the University holds ultimate academic control of the programmes and the awards. Proposals to modify validated programmes require approval from the external examiner and are subject to University Principles and Regulations. Despite the lack of a written procedure for the design and development of programmes, these practices are sufficient to enable the Expectation to be met.

2.3 The review team scrutinised the written evidence including validation reports, programme agreements, minutes of meetings and annual monitoring reports, and sought clarification at meetings with senior staff, teaching staff, professional support staff and students.

2.4 Although the School has a policy in respect of programme design it does not include any indication of the process by which programme design is carried out, and has no internal written procedure for design and development of programmes. The review team **recommends** that the School should formalise and document the internal process for the design, development and approval of programmes.

2.5 Proposals for programme development are discussed at Academic Board and then submitted to the University for validation. The Programme Leader has responsibility for writing the programme specifications and for collating module descriptors. The School makes use of its links with the wider church community, particularly through student placements, to inform programme design.

2.6 Elected student representatives are involved in the design and development of programmes through attendance by their representative at meetings of the Academic Board and through the provision of module feedback. Student views have informed, for instance, the development of new modules and the inclusion of essay-writing skills in the curriculum.

2.7 Programme development is considered during annual monitoring and is discussed at Academic Board. Teaching staff confirmed that they were able to suggest new modules and changes to existing modules for consideration by Academic Board prior to submission to the University for approval.

2.8 The Expectation is met for the programmes currently being delivered under the approval of the University. Although consideration of proposals for programme development



has taken place at Academic Board and during annual monitoring, the lack of a formalised process for the design and development of future programmes constitutes a weakness in the School's structure for academic governance, which is exacerbated by current uncertainty about its future awarding body. The level of risk is moderate.

**Expectation: Met**

**Level of risk: Moderate**

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

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

**Findings**

2.9 Students who began a programme of study before 1 January 2017 were recruited and admitted using admissions processes that were overseen by, and in accordance with, the requirements of the University. Although the School does not have its own admissions policy, its admissions and recruitment process has been built around the University's criteria and its own Equal Opportunities Policy. Since January 2017 the School has been actively recruiting students for admission in 2017-18 and, although lacking an awarding body for its programmes, has continued to use the same internal admissions and recruitment processes.

2.10 The School provides information about its programmes on its website and through its magazine prospectus. Prospective students may arrange a 'taster day' to visit the School in order to discuss the programme in more detail with staff, and may apply directly through the School's website, requiring payment of an admission fee and the provision of supporting documentation. Applicants who appear to meet the admissions criteria are invited to interview, usually by video conference with two members of staff. Following the interview, successful applicants are asked to accept an offer by letter without written confirmation of fees or of other terms and conditions such as confirmation of the facilities and learning resources, which the School will provide to the student, the policies and procedures that will apply to the student during the period of study, and the student's liability following withdrawal from the programme after acceptance of an offer. Prior to enrolling, applicants who have accepted offers are provided with a copy of the Student Handbook, which contains an explanation of terms and conditions including a statement of liability for fees. Although feedback is available to unsuccessful applicants, they are not routinely invited to seek such feedback.

2.11 Since 1 January 2017, the School has invited successful applicants to accept an offer of admission to a programme prior to the School's establishing a partnership with an awarding body. In these circumstances the School remains unable to provide definitive information about applicable fees or regulations, about the awarding body that would approve its programmes, or about a date by which its programmes would be available. The School's website makes no mention of the current lack of an awarding body for its programmes, although prospective students are informed when they make an enquiry that the School is without a current awarding body and is attempting to create a new validating partnership in time for September 2017.

2.12 The School's arrangements for admissions and recruitment are not sufficient to allow the Expectation to be met. They contain numerous shortcomings, including the lack of a written admissions policy, the lack of regular evaluation of the admissions process, the lack of training or guidance in the conduct of interviews, the lack of access by prospective students to a complaints procedure and the lack of definitive information for applicants about fees and about terms and conditions. The current practice of active recruitment, including requesting prospective students to accept an offer of admission to a programme without an awarding body and without confirmation of fees or of terms and conditions, is not consistent with a transparent and valid admissions process and does not adhere to the principles of fair admission. The review team **recommends** that the School should establish and implement

an admissions policy that adheres to the principles of fair admission.

2.13 The review team considered the documentation that described the admissions process and the admissions requirements of the University, as well as the information that an applicant receives during the admissions experience, including information available on the School's website. The team met teaching staff, professional support staff and students to understand their view of the admissions process.

2.14 Students expressed satisfaction with the amount and nature of information they received when applying to the School, and confirmed that they found the 'taster days' particularly helpful, drawing attention to the availability of staff to answer any questions about the programmes or wider student experience.

2.15 The lack of training for staff in relation to admissions processes is a weakness in respect of the reliability and validity of admissions decisions and in respect of the School's ability to evaluate and reflect on its processes.

2.16 The School's application flow chart does not include any reference to a complaint or appeal policy for applicants, and no such policy is available on the website. Although the review team heard that an applicant who wished to make a complaint would be directed to the student Complaints and Grievances Policy, this policy does not make explicit provision for applicants, and unsuccessful applicants are not routinely made aware of it. The lack of a publicly available complaints procedure, alongside the failure to provide definitive information to applicants about fees and about terms and conditions, limits the accessibility of the School's admissions process.

2.17 The School is committed to equality of opportunity in the services it provides to students and aspires to achieving a diverse student body. Nevertheless, the School failed to express clearly any positive steps that it is taking to achieve such diversity. Although the School affirmed that it welcomed applications from students of any gender, this commitment did not appear to be reflected in the gender balance of the staff and students met by the review team.

2.18 The School appears to have limited understanding of the responsibilities associated with recruitment and admissions. It does not undertake regular formal evaluation or reflection on the admissions process, restricting its ability to recognise shortcomings and make improvements. The School's current approach to recruitment and admissions does not meet the Expectation. The shortcomings in its processes constitute significant gaps in policy and procedure relating to the quality assurance of its provision. The level of risk is serious.

**Expectation: Not met**

**Level of risk: Serious**

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

**Quality Code, Chapter B3: Learning and Teaching**

## Findings

2.19 The School has a Teaching and Learning Policy that sets out the broad principles underpinning its aim of providing students with a high quality learning experience. In addition to the classroom-based learning activities experienced by campus-based students, the School's aim to cater for distance learning students means that it places a significant emphasis on the role of the VLE in the delivery of its programmes. Many of the distance learning students are linked to Learning Communities in the UK and abroad as described in Expectation B10, and in this context the work of mentors based in the Learning Communities is also an important feature of the support for learning. The School has introduced a protocol for the peer observation of teaching to support academic staff and to assist in the dissemination of good practice. It also has an Academic Staff Development Policy with an expectation that all newly appointed staff will become Fellows of the Higher Education Academy within two years of their appointment. These arrangements would have the capacity to meet the Expectation.

2.20 In order to evaluate the effectiveness of the School's approach, the review team scrutinised the School's policy documents, minutes of relevant meetings including those of Academic Board, the Quality Review Meeting, and the Academic Strategy Group, and external examiners' reports for the last two academic years. The team also accessed the VLE and met a range of staff, students and a Lead Mentor from a Learning Community.

2.21 Although the aims of the Teaching and Learning Policy are generic in nature, academic staff and students expressed a shared understanding of what characterises the learning experience at the School. In particular, the School places significant emphasis on converting theory into pastoral practice, while successfully using research to inform teaching.

2.22 Students expressed satisfaction, consistent with the findings of student surveys carried out in 2015 and 2016, with their experience of learning and teaching within the School, particularly citing the academic knowledge and awareness of current research of their tutors and the effectiveness of the VLE in supporting their learning.

2.23 The School has made further developments to its VLE in line with its strategy to increase the number of distance learning students and of Learning Communities. In addition to the existing minimum VLE requirements for each module, which are emphasised to staff in induction, the review team heard that this initiative includes the systematic production of video material for inclusion in modules on the VLE, and the creation of guidelines specifying the number and expected lengths of video material in each module. Video material is produced in-house, contracted out for editing, and approved by the Provost. The review team found the teaching and learning material on the VLE to be comprehensive and accessible.

2.24 In considering the role of Learning Communities in supporting learning, the review team heard from the Lead Mentor of a Learning Community, who explained how he supports learning through weekly meetings with a group of three students, and from a student who was part of a local Learning Community with three mentors supporting four students, and who expressed positive views about the support offered by mentors. The review team

concluded that mentors in Learning Communities offer effective support for learning.

2.25 In line with a recently introduced protocol for peer observation of teaching, all full-time staff are observed annually and part-time staff every two years by observers appointed by the Programme Leader. Academic staff reported that they had found this an enjoyable and helpful process to obtain feedback on their teaching practice. The Academic Administrator is responsible for identifying examples of good practice and for dissemination to all staff via the VLE.

2.26 The University requires teaching staff to be approved by it, based upon clear criteria for required and desirable levels of qualification and teaching experience. The Teaching and Learning and Academic Staff Development Policies state that all academic staff are encouraged to seek membership of the Higher Education Academy and, although it is not a contractual obligation, that new full-time salaried staff are required to do so within two years of appointment. All new teaching staff attend induction sessions which introduce them to the Teaching and Learning Policy and other key areas of academic practice. The Academic Staff Development Policy sets out the entitlements of staff to a range of opportunities for professional development, including, for full-time academic staff, one day per week free of teaching duties. Staff had participated in a variety of activities both within and beyond the School, including events at Tyndale House, Cambridge and conferences such as the Society of New Testament Studies in Amsterdam in 2015.

2.27 Learning opportunities and teaching practices at the School enable students to effectively pursue their vocation and develop them as independent learners with a capacity for analytical, critical and creative thought. The Expectation is met and the level of risk is low.

**Expectation: Met**

**Level of risk: Low**

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

**Quality Code, Chapter B4: Enabling Student Development and Achievement**

**Findings**

2.28 The School identifies its Academic Strategic Meeting as the forum in which the development of programmes and associated resources is discussed. The Academic Dean provides a link between this group and Academic Board, where issues regarding student support and development opportunities are also considered. Undergraduate students commencing their studies are required to attend a week-long 'conference' which serves as their induction to the School. Ongoing academic and pastoral support is provided by academic staff and pastoral groups. Students are also encouraged and supported to engage with the wider church community throughout their studies, including through undertaking placements in Learning Communities and through the Union Conference. Students primarily access the resources to support their studies through the School library and VLE. Collectively, these arrangements have the potential to meet the Expectation.

2.29 The review team considered the effectiveness of the School's approach to enabling students to develop their academic, personal and professional potential by speaking with staff and students and scrutinising documentation including the minutes of committees, induction materials, details of library provision and learning materials available to students on the VLE.

2.30 The week-long Union Conference, which is attended by new students, including those studying by distance learning, and by returning students, is valuable in establishing the ethos of the School as a community of learning for those in, or aspiring to join, Christian ministry. It is also important in providing opportunities for the development of a range of academic skills and an introduction to library resources. The School expects students to engage with the wider church community in order to develop their practical skills and actively supports them by providing links to local churches and assisting them in finding jobs.

2.31 Small cohort sizes enable academic staff at the School to provide students with high levels of support for their academic and personal development. Students are also allocated a personal tutor whom they may meet as part of a group or on a one-to-one basis. Additional support is also available from a part-time Welfare Officer. Students reported that these arrangements worked well and that the personal tutor system is widely used.

2.32 The School library holds approximately 100 journal titles, 30,000 hard copies of books and a growing number of e-books. The VLE provides students with access to a range of additional resources associated with individual modules. The professionally accredited librarian is proactive in developing the service and supporting students, including through student induction sessions in, for example, information literacy. Students expressed positive views about these sessions, whose supporting materials appeared to be of high quality. Although students do not have access to the online facilities of the Society of College, National and University Libraries, they may take advantage of the network of interlibrary loans and resource support of the American Theological Library Association; additionally, the work of some is supported by local libraries. Students expressed the view that they have good access to online resources and that the hard-copy library resources are adequate, confirming the views of students who took part in the re-validating of the School's programmes in 2016.

2.33 The School maintains and, where appropriate, analyses data on student progress,

but due to small cohort sizes it is not possible to draw meaningful conclusions about retention and progression rates.

2.34 The minutes of the Academic Strategic Meeting and the Academic Board each show consideration of issues that impact on the quality of the resources and support provided to students, although the rationale for the choice of forum for the discussion of a particular issue is not always clear. Nevertheless, the small size of the School and cross-membership of committees enables the School to put in place and monitor the adequacy of resources available to students.

2.35 The School has effective arrangements and resources in place to enable its students to develop their academic, personal and professional potential. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

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

### **Quality Code, Chapter B5: Student Engagement**

#### **Findings**

2.36 Students have a number of opportunities to engage in the assurance and enhancement of their educational experience. At programme level, students complete Module Feedback Forms which are seen by Module Leaders, Programme Leaders and the Provost. A response to the module feedback is provided on the VLE for all students to see. Each programme also has a Programme Board whose meetings enable staff and students to discuss feedback and monitor the implementation of changes. In addition, students have regular meetings with pastoral tutors where they can raise issues informally if they wish.

2.37 Each programme has an elected representative who attends Academic Board. Representatives, both campus-based and distance learning, are expected to take some responsibility for keeping the student body informed about the outcomes of meetings that they attend. Staff provide training to representatives, supported by written information for those who have not attended the training.

2.38 The School also runs an annual survey, in conjunction with the students, to provide opportunities for each student to feed back about a wider range of areas within the student experience. Students are not involved with the preparation of the Annual Monitoring Review, but are able to view a draft of the outcomes on the VLE.

2.39 Students are provided with a number of opportunities to provide feedback, through informal, formal and representative structures. Formal feedback is recorded and staff provide responses to students regarding the outcomes of their feedback. Students are included in decision making through Academic Board. These arrangements enable the Expectation to be met.

2.40 The review team tested the Expectation through considering the evidence including information provided for students in the Student Handbook, and the minutes of meetings at which student representatives were present. The team met students, including student representatives, to understand their views and interactions with the School, and also met staff at a variety of levels within the School to explore how the processes for capturing student feedback works in practice.

2.41 While there is no formal structure for doing so, the size of the student body is sufficiently small for effective informal communication between representatives and the Student President, who has a weekly meeting with the Provost and who feeds back any forthcoming changes to the student body.

2.42 The processes work effectively in enabling both students and staff to engage and benefit. Although the lower level of engagement by distance learning students with providing feedback at modular and programme level may be understandable, the review team did not find any evidence of the School considering strategies to attempt to improve this.

2.43 Students are seen as partners in their educational experience, are members of key decision-making bodies, and feel themselves to be highly involved in the assurance of their experience. Shortcomings in respect of the involvement of students in annual monitoring and engagement with distance learning students constitute minor omissions. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**



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

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

**Findings**

2.44 The School has responsibility for the assessment process, including for setting and marking assessments, in accordance with the University's regulations. Learning outcomes and the type and form of assessment to be used for each module are defined in the programme specifications and in module descriptors, available on the VLE and University's website.

2.45 University regulations require samples of marked work to be sent to the external examiner before submission of results to the University's Module Assessment Board. The Organisational Agreement with the University requires the School to convene an assessment board to ratify the results prior to presentation to the University Assessment Board.

2.46 The School's policy on academic malpractice is based on the University's process, and is available to students. All essays are submitted online using plagiarism-detection software and exams are carried out to comply with the University's regulations. Students receive an induction session on academic malpractice and are required to sign an Academic Malpractice Declaration, which is retained for the duration of their studies. The School's process for dealing with allegations of academic malpractice include a meeting with the Chair of the Assessment Board, followed up if necessary by referring the allegation to the University.

2.47 Although the School has received no requests for recognition of prior learning, a student seeking such recognition may submit an application to the School which, if supported by the Programme Leader, would subsequently be considered by the University under its regulations.

2.48 The arrangements for managing assessment during the period of oversight by the University enable the Expectation to be met.

2.49 The review team scrutinised the written evidence including University regulations, programme agreements and specifications, and assessment board minutes, and sought clarification at meetings with senior staff, teaching staff and students.

2.50 Module descriptors contain learning outcomes but lack assessment criteria and grade descriptors. Staff confirmed that they work within the University's generic grade descriptors. An explanation of the University's generic marking criteria forms part of an induction session for students on examination and essay writing. Although assessment criteria for each learning outcome are not contained in module descriptors, students confirmed that assessment criteria are clearly explained and that they have access to sufficient information about them on the VLE.

2.51 Students are provided with an assessment schedule and an examination timetable, which enables them to plan their workload.

2.52 Draft assessment tasks and marking schemes are subject to internal verification within the School prior to being sent for approval to the external examiner. Staff receive training in marking and follow the University's marking regulations, which include second marking of a sample as defined in the Marking Monitoring Procedure. Outcomes of the second marking process are recorded in a monitoring form for each module. Additionally, samples of marked work are sent to the external examiner for scrutiny.

2.53 Although the School does not hold internal assessment boards before submitting results to the University's Module Assessment Board (MAB), it reviews the confirmed results from the MAB in detail to consider the progress of individual students.

2.54 The School's policy is that feedback on essays during term time should be provided within four weeks. Students confirmed that they typically receive feedback in about four weeks, and that feedback is helpful and constructive, but variable in depth of comment; students also confirmed they may obtain feedback on examinations by request from a tutor.

2.55 Students with disabilities may identify their particular needs on their application form. If accepted following professional assessment, these needs are communicated to teaching staff. The School offers a variety of reasonable adjustments to modes of assessment for students with disabilities.

2.56 The School has secure arrangements for managing assessment in respect of students registered on programmes leading to awards of the University. The Expectation is met. The assessment of any subsequent students would be under the oversight of a new awarding body: the level of risk is accordingly low.

**Expectation: Met**  
**Level of risk: Low**

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

**Quality Code, Chapter B7: External Examining**

**Findings**

2.57 The School manages its external examiners in accordance with the University's Quality and Standards Manual. This defines the role of external examiners, their rights and responsibilities, and procedures for their appointment and reporting. This is sufficient to allow the Expectation to be met.

2.58 The review team looked at the external examiners' reports for the School's undergraduate and postgraduate provision, minutes of Academic Board and examples of Annual Monitoring Reports to assess the effectiveness of the external examining processes. They also spoke with senior and academic staff and were provided with demonstrations of the VLE by a member of staff and a student.

2.59 External examiners are appointed by the University without input from the School, although there is evidence in the minutes of Academic Board that discussion takes place regarding the need for a replacement on completion of a term of office.

2.60 Assessments, including examinations and assignments, are subject to approval by the external examiner, who subsequently marks a sample of assessments selected in accordance with the University's assessment requirements. External examiners' reports confirm that they feel well supported in this process and that the relevant documentation is provided in good time.

2.61 External examiners attend assessment boards, often via video-conference. In one instance, an external examiner who was unable to attend was contacted by the University to ensure that they had been able to make their input to the process.

2.62 The external examiner submits an annual report to the University. This is received by Academic Board and a response is made to the external examiner by the School. Actions arising from the reports are considered at Academic Board and incorporated into the Annual Monitoring Report Action Plan where appropriate. The template for external examiners' reports requires the external examiner to confirm whether appropriate academic standards had been met and offers the opportunity to identify shortcomings or issues requiring attention or development. External examiners confirmed that the School had been responsive to their earlier recommendations and the review team also saw an example of a marking workshop set up for staff in response to an issue raised by an external examiner. External examiners' reports are made available on the VLE to both staff and students.

2.63 The School is operating the university's procedures for external examining effectively. The School's engagement with, and understanding of, the external examining processes is likely to enable them to utilise effectively the equivalent policies and procedures of any future awarding body. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

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

**Findings**

2.64 The School shares with the University the responsibility for programme monitoring and review. The University is responsible for monitoring and review in accordance with its own procedures, while the School is responsible for ongoing monitoring and for the establishment of mechanisms that ensure the involvement of staff, students and external examiners.

2.65 The University conducts Partner Reviews every three years and the revalidation of programmes every five years. The review of the School in February 2016 led to a requirement for a number of conditions to be met before a new formal Organisational Agreement and associated Programme Agreements could be produced. In addition, the University carried out a revalidation of the School's programmes in February 2016, granting indefinite validation approval for named programmes.

2.66 The University requires Annual Monitoring Reports to be produced. These are reviewed at meetings of the School's Academic Board before being sent to the University.

2.67 The School's arrangements, alongside oversight by the University, are sufficient to allow the Expectation to be met.

2.68 The Expectation was tested through the scrutiny of a range of documentation including partner review and validation reports, annual monitoring reports, organisational and programme agreements, and minutes of School meetings. The review team also held meetings with senior staff, academic staff, professional support staff and students.

2.69 The School evaluates each programme annually and completes an Annual Monitoring Report (AMR) using the University's template. The draft report is discussed at the School's Academic Board and is made available on the VLE to enable students to make comment. Students confirmed that they were aware that the report, together with feedback from the University, was available. These reports include sections for both the University Link Tutor and University Head of Subject to provide comment. The home faculty at the University considers the report alongside external examiner reports.

2.70 Annual Monitoring Reports are comprehensive and highlight areas of good practice, provide progress made on actions listed in the previous annual report and set out an action plan for the coming year. The team saw evidence of discussion at Academic Board of Annual Monitoring Reports, and of updates and modifications to the structure of programmes and to modules.

2.71 The Expectation is met for the period during which the University retains oversight of the annual monitoring process, which includes the period during which currently registered students complete their programmes. The School's experience of regular and systematic monitoring under the University's procedures is likely to enable it to utilise the equivalent policies and procedures of any future awarding body effectively. The level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

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

### **Quality Code, Chapter B9: Academic Appeals and Student Complaints**

#### **Findings**

2.72 Students are made aware of the relevant processes, namely the School's Complaints and Grievances Policy and the University's Academic Appeals Procedure, within their Student Handbook and can access the policies from the VLE. As described in Expectation B2, there is no procedure for complaints arising from an unsuccessful application for admission to a programme.

2.73 Students who wish to make a complaint are encouraged to do so informally in the first instance. If the concern cannot be resolved, the School's process enables a staged approach to the investigation and consideration of a complaint within a timely manner, culminating in the use of the final stage of the University's complaints policy. A student whose complaint has completed the final stage of the complaints procedure is provided with a Completion of Procedures letter. An appeal which has exhausted the internal process may be taken to the Office of the Independent Adjudicator.

2.74 Where students are concerned about their academic results, they are encouraged to speak informally with the Academic Administrator's assistant. Students who consider that they have grounds for an academic appeal may use the University's procedure, which stipulates a process for issues both before and after results have been confirmed.

2.75 The School's Complaints and Grievances Policy outlines the stages for consideration of a complaint. While the procedure does not explicitly follow all of the guidance in the Office of the Independent Adjudicator's good practice framework, students are not prevented from having their complaints considered fairly and in a timely manner. These arrangements are sufficient to enable the Expectation to be met.

2.76 The Complaints and Grievances Policy states that a complaint about the provision and conduct of academic programmes cannot be used retrospectively as grounds for an appeal against the decision of an assessment board. The grounds on which an appeal can be made are defined in the University's Academic Appeals Procedure and do not include the limitation referred to in the Complaints and Grievances Policy. This limitation expressed in the Complaints and Grievances Policy is potentially misleading and is incompatible with an effective complaints and appeals process in that it could lead to a gap in the provision of remedy for a legitimate complaint. The review team **recommends** that the School should ensure its complaints procedure does not seek to limit the grounds for an appeal against a decision of an assessment board.

2.77 The team tested the Expectation through considering the School's and validating partner's procedures, and the documentation that students were provided with informing them of the procedures and records of the processes being evaluated. The team also met students, professional support staff and academic staff to understand how the processes worked in practice.

2.78 The School has received no academic appeals and has had no complaints upheld. Although there is no evidence of the effectiveness of its processes, both staff and students expressed awareness of them and of how to use them in practice.

2.79 The School has satisfactory and accessible processes for handling appeals and complaints. The shortcoming in relation to the limitation of grounds for appeal requires an amendment to documentation which will not lead to major procedural change. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

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

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

**Findings**

2.80 There are two main ways in which the School works with other organisations to deliver learning opportunities: the provision of student placements and through a growing network of Learning Communities. In the case of the former, undergraduate students can choose credit-bearing placement modules that involve them working for three weeks in a church or mission organisation. Students are also encouraged to take up extracurricular ministerial placements. The arrangements for this are set out in the Union Placement Policy Document and the Ministry Placement I and II module descriptors. In the case of the Learning Communities, the School has developed links with a number of organisations in the UK and abroad which provide local support for their distance learning students. A Memorandum of Understanding (MoU) is signed with each Learning Community, and Lead Mentors, based at each Learning Community, are approved and provided with an induction to their role. These arrangements have the potential to meet the Expectation.

2.81 The review team tested the effectiveness of these arrangements by scrutinising a range of policies and procedures, administrative records, pro formas and minutes of School committees. They also held discussions with the President, academic and professional support staff, students (including some who had been on placement and one from a Learning Community) and a Lead Mentor.

2.82 The Union Placement Policy sets out the arrangements for both extracurricular and modular placements in terms of the purpose of the placement, the people responsible for managing the placement, the selection of placements, the documentation required for modular placements and the requirement for the risk assessment of placements. In all cases a member of staff from the placement is identified as a 'local supervisor' to ensure that it operates effectively and to provide local accessible support for students. Students who had been on placement and staff involved in organising them explained how care was taken to ensure the suitability of the placement through discussion with both the placement provider and the student themselves. Students also confirmed that while on placement, support was readily available from the placement provider as well as directly from the School. The review team was unable to obtain access to some documents referred to in the Placement Policy, including examples of the risk assessments. Nevertheless, the team was satisfied that placements are organised effectively to offer an experience that students confirmed provide them with good opportunities for practical learning and for reflection on their learning.

2.83 In order to enhance the support of students on distance learning programmes the School has established a number of learning centres hosted typically, but not exclusively, by churches. These enable students in the same geographical area to meet, together with a mentor. The current register of Learning Communities lists 10 in the UK, three elsewhere in Europe (Athens, Helsinki and Rome) and four in North America. It is a strategic priority of the School to continue to increase the number of Learning Communities in coming years. The relationship between the School and each Learning Community is governed by a Memorandum of Understanding (MoU) which commits the host to providing study space and student support from experienced pastors and theologians. Although the text of the MoUs provides a suitable basis for partnerships with Learning Communities, the formal approval process for the establishment of a new partnership and the responsibility for discussion and

recording of the process was unclear. While the minutes of Academic Board, the Academic Strategic Management Meeting and the Quality Review Meeting make occasional reference to the management of provision in existing Learning Communities there is no mention of the approval of new Learning Communities or consideration of the implications of increasing the number of them. In its 2016 Periodic Review of its partnership with the School, the University was informed that the location of future Learning Communities would take on 'a more strategic aspect'. However, such a strategic approach to the approval of new Learning Communities was not apparent from the minutes of these meetings. The team also noted that, given the strategic priority to continue to expand the number of Learning Communities, there was no evidence of consideration of the resource implications of this growth. Although the School's support for its current Learning Communities is effective, in order to ensure that the development of, and support for, future Learning Communities is equally effective, the team **recommends** that the School establishes a sustainable and strategic approach to the selection and support of Learning Communities.

2.84 Each Learning Community is supported by a Lead Mentor, typically a local church leader who volunteers for the role and is appointed by the School. Lead Mentors are provided with a handbook and participate in a mandatory induction programme which provides an effective way of developing their appreciation of the ethos of the School and their understanding of UK higher education. Lead Mentors maintain effective contact with the School on a regular basis: the School's policy requires each Learning Community to be visited by a member of staff of the School every two years and for the mentor's work to be observed. Lead Mentors, with their personal experience of the ministry and understanding of theology, are particularly valuable in providing support to groups of students studying at a distance from the main School campus. The commitment of mentors to their role is evidenced by the time that they are prepared to spend meeting with students on a regular basis, as a volunteer. A student based in a Learning Community testified to the accessibility and availability of the associated Lead Mentor and to his commitment to offering helpful and constructive support. The review team consider the effective, local and accessible support provided to communities of distance learning students by Lead Mentors to be **good practice**.

2.85 The processes in place for the management of placements and of the learning opportunities provided by the School's current Learning Communities are effective in ensuring the quality of learning opportunities. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**



**Expectation (B11): Research degrees are awarded in a research environment that provides secure academic standards for doing research and learning about research approaches, methods, procedures and protocols. This environment offers students quality of opportunities and the support they need to achieve successful academic, personal and professional outcomes from their research degrees.**

### **Quality Code, Chapter B11: Research Degrees**

#### **Findings**

2.86 Research programmes at the School are available for study on either a full-time or a part-time basis, and for either campus-based or distance learning study. Prospective research students access information on the website, as described in Expectation B2. Before making an application, students are required to discuss a draft research proposal with a potential supervisor. The application process then proceeds as reported in Expectation B2. Each research student has two supervisors based at the School and a director of studies based at the University. All supervisors are appointed by the University.

2.87 The School is not currently making offers to prospective research students, instead informing them that they will make contact once a suitable relationship with a validating partner has been established.

2.88 Research students are provided with a handbook that explains all of the reporting, monitoring and examination processes. Students interact with their supervisor on a monthly basis and have access to the School's library resources. Students have a formal annual reporting requirement; the potential negative outcomes of these processes are not included within the handbook but are explained to students by their supervisors. All students are enrolled for a programme leading to the award of a Master of Philosophy; those who wish to progress to a doctorate are assessed at 12 months with the potential to then register for a doctoral programme.

2.89 The School's processes for the support of research degree students are based on the University's requirements and, if securely implemented, would allow the Expectation to be met.

2.90 The review team considered the research Student Handbook and the University's regulations regarding research students, as well as the information available on the School's website. The team met the Director of Research, professional support staff and a doctoral student to understand how the processes worked in practice.

2.91 The School's arrangements enable students to be part of a research environment that provides quality of learning opportunities and support to enable students to complete their programmes successfully. The environment includes an annual conference based in the School, at which students are invited to present a paper. Additionally, each research student is required to present a paper at a peer-reviewed conference each year. Students, including those studying at a distance, expressed positive views about their experience and the support offered by the School.

2.92 The School has processes that closely mirror the University's requirements and these arrangements, alongside the oversight provided by the University, ensure secure management of research degree provision. The Expectation is met and the level of risk is low.

**Expectation: Met**  
**Level of risk: Low**

## The quality of student learning opportunities: Summary of findings

2.93 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. All of the Expectations for this judgement area have been met, with the exception of Expectation B2. The associated level of risk was judged to be low, except for Expectations B1 and B2.

2.94 In respect of Expectation B1, a weakness in the School's structure for academic governance led to a moderate level of risk.

2.95 Expectation B2 is associated with a serious level of risk arising from shortcomings that constitute significant gaps in policy and procedure relating to the quality assurance of the School's provision.

2.96 The review team made four recommendations in respect of the quality of student learning opportunities. The first, relating to the weakness in the School's structure for academic governance identified in Expectation B1, relates to the formalisation of the process for the design, development and approval of programmes. The second, relating to the significant gaps in policy and procedure relating to quality assurance identified in Expectation B2, follows from the lack of an admissions policy adhering to the principles of fair admission. The third relates to the need to ensure that the complaints procedure does not seek to limit the grounds for an appeal against a decision of an assessment board. The final recommendation arises from the School's approach to the selection and support of Learning Communities.

2.97 There are no affirmations in this judgement area. The single feature of good practice in this judgement area relates to the support provided to communities of distance learning students by Lead Mentors.

2.98 The shortcomings in Expectation B2 constitute a major gap in the School's provision and present a serious risk to the management of this judgement area. The School appears to have only a limited understanding of its responsibilities in this area, and has put in place only limited controls to mitigate this risk. The review team concludes that the quality of student learning opportunities at the provider **does not meet** UK expectations.

### **3 Judgement: The quality of the information about learning opportunities**

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

#### **Quality Code, Part C: Information about Higher Education Provision**

##### **Findings**

3.1 The School provides information to the public and prospective students through social media, its website and its prospectus. All promotional literature has been required to be endorsed by the validating partner prior to being published.

3.2 Information for prospective students is provided by staff in response to queries and within the offer letter provided to successful applicants. Information for current students is primarily delivered through the Student Handbook and the VLE. Students receive a new Student Handbook each year; handbooks are subject to annual approval by the University prior to publication.

3.3 If securely managed and implemented, the School's processes in relation to promotional material and information available to current students would be sufficient to allow the Expectation to be met.

3.4 The team considered the documentation provided by the School regarding the quality of its information, including Student Handbooks, the School's website, the School's public information procedures, the University's Admissions Process, samples of letters with offers of admission to a programme, examples of promotional materials and other material relating to the provision of information to students and prospective students. In addition, the team met senior staff, teaching staff, professional support staff and students to understand the processes involved with the creation of the material, and to gain insight from a student's perspective on whether information is trustworthy, accessible and fit for purpose.

3.5 The review team identified a number of shortcomings in the management of information for prospective students. Since the termination of its Organisational Agreement, the School has continued to provide information about its programmes with the removal of references to a validating partner. Although the School has confirmed that enquirers who contact the School are informed of the current status of the validated provision, a prospective student considering the promotional material would reasonably but incorrectly infer that the School is running higher education programmes for which it has the power to award degrees. While the School acknowledged that information on its website about its lack of an awarding body may be misleading, its view that the website makes clear that there is no awarding body at present was not borne out by the review team's inspection of the website.

3.6 Prospective students are currently given inconsistent information regarding application fees, with different entries on the School's website showing different levels for this fee, an inconsistency which the School was unable to explain.

3.7 The University's processes require it to approve all promotional material regarding the programmes that it has validated. However, promotional material that included the University's name, for use by a Learning Community in Greece to promote the Graduate Diploma programme, had been approved and used by the School without gaining permission from the University.

3.8 These shortcomings are indicative of significant gaps in the School's procedures for the management of public information. The review team **recommends** that the School should produce public information about its provision which is fit for purpose, accessible and trustworthy.

3.9 Both during its relationship with the University and subsequently, the School has invited prospective students to accept offers of admission without knowledge of the fees or of its other terms and conditions. Prospective students who accept an offer of a place on a programme are, prior to enrolment, provided with a Student Handbook outlining the terms and conditions. The terms include the student's becoming liable for fees upon enrolment on the programme without any opportunity to withdraw at that stage; they also enable the School to revise, alter or discontinue programmes, modules, regulations and procedures at any time and attempt to remove from the School any responsibility for errors or omissions in its documents. The review team formed the view that the School's terms do not enable students to make an informed selection of their programme and **recommends** that the School should ensure that information in Student Handbooks is aligned with guidance from the Competition and Markets Authority.

3.10 While the School has processes in place for managing information, these processes are not being used sufficiently rigorously to ensure the quality of information for the public and for students. Shortcomings in the provision of information are indicative of significant gaps in procedures relating to the School's information about its provision. The Expectation is not met and the level of risk is serious.

**Expectation: Not met**

**Level of risk: Serious**

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

3.11 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is not met. The significant gaps in procedures relating to the quality assurance of the management of information lead to a level of risk that is serious.

3.12 There are no features of good practice or affirmations relating to this judgement area.

3.13 There are two recommendations in this judgement area, each of which relates to the significant gaps in procedures identified in the Expectation. The first relates to shortcomings in the provision of public information, while the second arises from the lack of alignment between information in Student Handbooks and guidance from the Competition and Markets Authority.

3.14 The single Expectation for this judgement area is not met and is associated with a serious level of risk. The lack of rigour in the implementation of its processes for managing information means that the School has only limited controls in place to mitigate this risk. The review team concludes that the quality of the information about learning opportunities at the provider **does not meet** UK expectations.

## 4 Judgement: The enhancement of student learning opportunities

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

### Findings

4.1 The School's approach to the enhancement of its provision is based on its strategic aims for the coming year and on its Teaching and Learning Policy. Its strategic aims encompass using its core values to improve 'what we do and enhance the Learning Opportunities for the students' and to continue 'Improving online platform and digital systems'. The revised Teaching and Learning Policy was developed in November 2016 in order to focus on the fact that 'Students, and the quality of their learning experience within the wider context of preparation for ministry, are at the centre of the School's mission'. The School 'seeks to encourage creative thinking and academic rigour by study anchored in Scripture.' The School's Strategic Plan, dating from 2013, includes augmenting the academic staff as a key factor of success, with a view to increasing a sense of community through offering role models to students.

4.2 The School's approach to enhancement, if rigorously implemented, would allow the Expectation to be met.

4.3 The review team scrutinised the written evidence, including the School's Enhancement Policy, Teaching and Learning Policy, Strategic Plan and minutes of the Academic Strategy Group. It sought clarification at meetings with senior staff, teaching staff, and students and observed a demonstration of the VLE by a member of teaching staff and a student.

4.4 Although the School does not have a documented process that shows deliberate steps taken at provider level, it does take steps to enhance provision in an informal manner and has recognised the need to consider Enhancement at a strategic level, for instance as a regular agenda item for the Academic Board. Members of staff identified the Teaching and Learning Policy together with peer observation and staff development workshops for sharing good practice in teaching and learning as elements of a strategy for enhancement. To date, the School has concentrated enhancement activities on its Learning Communities and the production of associated distance learning materials, which are available to all students via the VLE. Members of senior staff, however, confirmed that the School's developing enhancement strategy included these activities among its components.

4.5 While there are examples of enhancement activity being developed and implemented, a provider-level approach is not yet wholly systematic or clearly articulated. The School has not yet identified senior responsibility for oversight of enhancement. The review team **recommends** that the School should further develop, establish leadership of, and securely implement the strategy for enhancement.

4.6 At the time of the review visit the School used informal initiatives to enhance the learning opportunities, which was confirmed by students. This, together with the commitment to include Enhancement as an agenda item for the Academic Board, enables the Expectation to be met.

4.7 The School is in the early stages of developing and implementing a strategic approach to enhancement at provider level, and has recognised the need to consider enhancement at a strategic level, exemplified by its commitment to including enhancement as an agenda item in future Academic Board meetings. The Expectation is met, but the lack

of secure implementation of a strategic approach to enhancement indicates a weakness in the School's academic governance structure: the level of risk is moderate.

**Expectation: Met**

**Level of risk: Moderate**

## The enhancement of student learning opportunities: Summary of findings

4.8 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is met, but the lack of secure implementation of a strategic approach to enhancement indicates a weakness in the School's academic governance structure and gives rise to a moderate level of risk.

4.9 There are no features of good practice or affirmations relating to this judgement area.

4.10 The single recommendation in this judgement area relates to the development, leadership and implementation of the School's strategy for the enhancement of learning opportunities.

4.11 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](#).

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

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

### Academic standards

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

### Award

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

### Awarding organisation

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

### Blended learning

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

### Credit(s)

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

### Degree-awarding body

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

### Distance learning

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

### Dual award or double award

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

### e-learning

See technology enhanced or enabled learning.

### **Enhancement**

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

### **Expectations**

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

### **Flexible and distributed learning**

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

### **Framework**

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

### **Framework for higher education qualifications**

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

### **Good practice**

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

### **Learning opportunities**

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

### **Learning outcomes**

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

### **Multiple awards**

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

### **Operational definition**

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

### **Programme (of study)**

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

**Programme specifications**

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

**Quality Code**

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

**Reference points**

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

**Self-evaluation document**

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

**Subject Benchmark Statement**

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

**Technology enhanced or enabled learning (or e-learning)**

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

**Threshold academic standard**

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

**Virtual learning environment (VLE)**

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

**Widening participation**

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

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