



## Specific Course Designation: report of the monitoring visit of Waltham International College Limited June 2018

### 1 Outcome of the monitoring visit

1 From the evidence provided in the annual return and at the monitoring visit, the review team concludes that Waltham International College Limited (the College) is making progress with continuing to monitor, review and enhance its higher education provision since the [November 2016 Higher Education Review \(Alternative Providers\) \(HER \(AP\)\)](#) and [June 2017 HER \(AP\) Partial Re-review](#), but further improvement is required.

### 2 Changes since the last QAA review visits

2 The College's accreditation with FutureQuals to offer the Diploma in Education and Training (DET) has lapsed as a result of no registrations. It now offers the same qualification which is awarded by the Vocational Training Charitable Trust. There are 45 students enrolled on this programme.

3 In April 2018 the College enrolled 122 students on the Pearson Higher National Certificate programme through a subcontracting arrangement with Milton Keynes College. Student numbers at the College have risen from seven, at the time of the Partial Re-review in June 2017, to 167 this academic year. The visit was extended to allow for discussion of areas of interest arising from the increase in student numbers and the nature of the subcontracting arrangement with Milton Keynes College.

### 3 Findings from the monitoring visit

4 The College is making progress with its action plan from the 2016 and 2017 reviews, but further improvement is required. While it has implemented 10 of the 13 recommendations from the 2016 review, further development is required to address the remaining recommendations from that review and one recommendation from the June 2017 Partial Re-review. The College has continued to make progress with regard to ensuring full and transparent recording of discussions and decisions at deliberative committees which was an affirmation from the 2016 review. The review team found that the College has the capacity to manage its expanded student numbers, based on scrutiny of student admissions documentation, which showed that effective systems are in place to recruit students with integrity, supported by the recruitment of additional staff and the lease of more space in its current premises. Review of the partnership agreement with Milton Keynes College also confirmed the effectiveness of systems in place to maintain academic standards.

5 The College has responded to recommendations to ensure that decisions on academic standards and the quality of learning opportunities are taken separately from those which relate to business and development, and that academic governance structures are fit for purpose, function in accordance with terms of reference and are consistent with internal policies and procedures. A revised academic governance structure is to be implemented from July 2018 and the structure and associated committee and board terms of reference demonstrate a clear separation of business and academic functions, reflecting a governance structure that is fit for purpose (paragraph 9). Minutes of the College's committees and boards indicate that they are operating effectively within their terms of reference and are

consistent with internal policies and procedures (paragraph 10). The College is continuing to take steps to ensure full and transparent recording of discussions and decisions at deliberative committees (paragraph 11). There is clarity and consistency in documentation outlining the purpose, roles and responsibilities of assessment boards (paragraph 12). Learner outcomes are agreed and clearly recorded (paragraph 13) and robust programme approval processes are now in place (paragraph 14).

6 Student representatives have opportunities to consider outcomes from external verifier reports (paragraph 15) and actions from these reports are clearly recorded and rigorously followed up (paragraph 16). An effective procedure to learn from informal complaints is in place, and its implementation is supported by a record that the College keeps of informal complaints (paragraph 20). Appeals procedures are clear and well-understood by students and flowcharts of the procedures are available in classrooms (paragraph 21). The College has taken effective steps to ensure that documentation it publishes is fit for purpose and it operates version control to maintain currency of the documents (paragraph 22).

7 Further development is required to ensure that the independence and fairness of the complaints and appeals processes is protected (paragraph 8), that the Student Engagement Policy fully addresses student engagement (paragraph 17) and to ensure that the Enhancement Policy facilitates the identification of new enhancement opportunities (paragraph 23). In addition, the lack of effective action planning in the Annual Review process means that it is possible that some issues relating to academic standards and quality may be overlooked (paragraphs 18-19).

8 The 2017 Partial Re-review report recommended that the College clarify the complaints policy to ensure that an individual member of staff would not be involved in more than one stage of the complaints procedure. The College has reviewed the policy and the Academic Board approved a simplified Student Complaints Policy and Procedure in August 2017. The Policy is to be reviewed annually. In the revised policy, consideration of the initial complaint is delegated to the Academic Board and any resultant appeal is made to the senior management team (SMT). However, some members of staff sit on both the Academic Board and SMT and the revised policy does not explicitly state that an individual member of staff should not be involved in more than one stage of the complaints procedure. As such, the potential to compromise the independence and fairness of the process remains.

9 The recommendation to ensure that decisions on academic standards and quality of learning opportunities are taken separately from those which relate to business and development has been addressed. There is a clear delineation of the responsibilities for academic and operational matters which is formally documented. The Academic Board has oversight of all matters relating to academic standards while the SMT oversees operational matters including resources and marketing. The remits of Individual Programme and Assessment and Standardisation Boards are clear and appropriately address issues relating to academic standards. They report to the Academic Board which, in turn, provides reports on academic matters to inform the SMT. All staff share an understanding of the changes in structure and the separation of responsibilities.

10 The recommendation that academic governance structures are fit for purpose, function in accordance with the terms of reference and are consistent with internal policies and procedures has also been addressed. The College has reviewed minutes of the meetings of all committees to ensure that only agenda items relating to their individual terms of reference are considered. Minutes show that the boards and committees are operating in line with their remits.

11 Building on the affirmation arising from the 2016 review relating to the steps being taken to ensure full and transparent recording of discussions and decisions at deliberative committees, the College has developed new meeting templates. Meeting minutes seen by the team indicate that the recording of discussions and decisions has been further developed and embedded within the College structures. The College has also arranged for training in minute taking for all staff.

12 The College has addressed the recommendation to ensure clarity and consistency in documentation outlining the purpose, roles and responsibilities of Assessment Boards. Assessment and Standardisation Boards are responsible for considering, approving and recording the marks for all students undertaking modules being assessed. The Boards determine each candidate's progress in the stage under consideration from marks and other assessments supplied, including reports on professional training. Assessment and Standardisation Board documentation seen by the team support the team's view that this recommendation has been addressed.

13 The College has responded to the recommendation to clearly record decisions on student progression, credit achieved and final awards. Assessment and Standardisation Board meeting minutes clearly show agreement of individual learner outcomes which are confirmed by the Academic Board.

14 The 2017 Partial Re-review report noted that the College had adopted a revised policy for programme approval but that this had yet to be used at the time of the visit. The new Approvals Procedure helps to clarify the respective roles of the deliberative and executive bodies in programme approval and ensures that accurate information is used to inform decisions. The Approvals Procedure describes in detail the arrangements for internal programme approval, including the development and approval of programme documentation and market research, but does not include external academic advice. Sample programme approvals demonstrate that the College considers new courses appropriately.

15 The recommendation to ensure that student representatives are given the opportunity to be fully involved in the consideration of comments and recommendations from external verifier reports has been met. Student representatives sit on Individual Programme Boards and the Academic Board where external verifier reports are considered. The External Quality Assurer report was considered in the DET Student-Staff Liaison meeting and the Individual Programme Board with the student representative present. Students confirmed that external examiner reports are made available to them on the virtual learning environment (VLE), which the team had sight of and were able to verify.

16 The College has developed a form for recording actions In order to establish a clear process for recording and tracking the completion of actions arising from external verifier reports. The form is detailed and the example provided to the team shows that actions are rigorously followed up. The action plan is considered at Individual Programme Boards and the Academic Board.

17 The 2016 review report recommended that the College ensure that policies and procedures on student engagement are fit for purpose, engage students as partners, are consistently followed, and are evaluated for effectiveness. The 2017 Partial Re-review report noted that more opportunities for student involvement were available but were in the process of being fully implemented. The Student Engagement policy focuses on engaging students in learning and does not consider the participation of students in quality enhancement and quality assurance processes. Students who met the team during the current visit confirmed that they actively participate in decision making and in shaping the quality of their learning experience through membership of the College's committee structure and through participation in Student-Staff Liaison Committee meetings. This involvement is set out in the

revised academic governance structure and its associated terms of reference and is described in the Student Representative Handbook. The Student Engagement Policy also states that the College will seek student feedback on education and services, involve students in decision making and provide students with a platform and opportunities to shape their learning and student experience. However, the Policy does not consider the participation of students in quality enhancement and quality assurance processes.

18 The College needs to make further progress to address the recommendation that the annual monitoring process fully enables the identification and recording of actions for improvement and enhancement. The current College Annual Review process which replaces the previous Programme Monitoring Reports, is a whole College process designed to produce a review of all College activity. The Annual Review policy is designed to ensure that programmes and their constituent modules/units remain fit for purpose, that academic standards are appropriate to the level of the programme, and to promote the quality enhancement of learning opportunities. The Annual Review policy mentions identification of areas for improvement but does not specifically discuss action planning.

19 The Annual Review produced for 2016-17 covers both the level 5 Higher National Diploma (HND) in Management and the level 7 Extended Diploma in Strategic Management and Leadership, both of which are Pearson programmes. The Annual Review includes areas for development but there is no action plan linked to these and it was not always clear to the team which information referred to which programme. In future, one Annual Review is to be produced covering all programmes offered by each awarding body. The Annual Review template includes reference to appropriate content requirements such as external examiner reports and student feedback. Annual Review forms contain some sections where action plans are included, for example, for student feedback, but not in a clear summative action plan which can be monitored and amalgamated with other actions from different sources. Staff indicated that issues are picked up throughout the year and are dealt with as they occur with oversight from the Academic Board. However, the team scrutinised Academic Board minutes and action plans including a list of all actions and the Enhancement Activity list, but could not track issues arising from the Annual Review through to successful completion from the minutes of the Academic Board. The minutes and its action tracking do show discussion of the Annual Review and consultation with staff but do not refer directly to actions arising from the annual monitoring process. As a result, there is the potential for issues relating to academic standards and quality to be overlooked within the annual review process.

20 The recommendation to ensure that the College identify and implement a mechanism for learning from informal complaints has been fully addressed. The Complaints Policy describes the manner in which informal complaints are logged in the complaints log book. Informal complaints related to academic matters are presented to the Academic Board while informal complaints on operational matters are presented to the strategic management team. The Academic Board should monitor and review complaints that are made over the course of each academic year but its remit does not explicitly reflect this duty. Students are aware of the complaints procedure and confirmed that the College responds appropriately to complaints raised by them citing, for example, the new VLE commissioned by the College in response to students' comments.

21 The College has revised its Academic Appeals policy and developed a flowchart in response to the recommendation to clarify the responsibility for confirming appeal decisions and ensuring that both the grounds for appeal and the process for dealing with upheld appeals are clearly articulated. It has made acceptable progress in response. The Student Academic Appeal Policy and Procedure applies to all programmes offered by the College and refers students to its awarding organisations if they are not satisfied with the outcome. Students are aware of the appeals policy and an associated flowchart, which is available on noticeboards.

22 Actions have been taken to address the recommendation to ensure that College documentation, including policies and procedures, are fit for purpose and provide trustworthy information for stakeholders. Version control has been implemented with the Quality Manual Checklist which is reflected in all policy documents. The Public Information policy clearly assigns responsibility for sign off of all information. A detailed audit of existing documents has recently been carried out which includes reference to the UK Quality Code for Higher Education (Quality Code) Part C: Information about Higher Education Provision. However, during the preparation for the monitoring visit, the wrong version of the Complaints Procedure was submitted to the team, which indicates that some further work may be necessary.

23 The 2016 review report recommended that the College clarify the procedures to be used to enable systematic identification of enhancement priorities and mechanisms for monitoring and evaluation. The 2017 partial re-review report noted the College's intention to strengthen the annual monitoring process, including making the links with enhancement more explicit and allowing greater student involvement. The effectiveness of the new approach had yet to be tested at the time of the 2017 visit. The College has a Strategy and Policy for Enhancement of Student Learning Experience which is comprehensive in that it identifies a range of activities that contribute to the enhancement of learning opportunities, including overall approaches to curriculum design, teaching and assessment. It also contains an action plan relating to areas contained within the Policy which includes extending opportunities for student engagement in the College's deliberative structures. However, the Policy does not include a mechanism, other than itself, whereby new areas for enhancement can be identified. Staff stated that opportunities for enhancement are identified by means of student feedback and by the Director of Quality. Paragraph 19 relating to the operation of the Annual Review process suggests that further development is required to realise the intentions of the Strategy and Policy for Enhancement of Student Learning Experience.

24 The College's Recruitment, Selection and Admission Policy is appropriate and contains the procedure that prospective students need to follow. The Policy adheres to the principles of fair admission, is transparent, reliable, valid, inclusive and underpinned by appropriate organisational structures and processes. It also describes the College's duty with respect to the provision of information to applicants and other duties of the College in relation to student recruitment. Staff and students confirmed that recruitment practices comply with the policy.

25 All students are required to complete an application form and initial assessments including Mathematics and English. However, the policy does not include an identity check on applicants or indicate how prior qualifications and work experience are verified. Also, apart from stating that all applicants will be interviewed, there is no explicit reference to determining intention to study. The UK NARIC is used to confirm the status of international qualifications but College checks with awarding organisations to confirm that certificates are genuine are not routinely carried out. The intention to study is addressed by means of the interview process. Where appropriate, references are obtained to confirm work experience, which the review team verified through the review of a dozen student files.

26 Entry requirements for each programme are available on the website. Admission requirements conform to those of the awarding organisations. English is tested using a commercial test overseen by admissions staff. Students from non-English speaking countries are required to demonstrate English at B2 level the Common European Framework of Reference (CEFR) and above in reading, writing, listening and speaking.

27 The College has a student attendance policy which states that students must attend all classes. The policy also includes the sanctions that will apply if students accumulate too

many unauthorised absences. Programme handbooks stipulate a minimum attendance requirement of 90 per cent and state that students can access their attendance records through the VLE. Students were unaware of the minimum attendance requirement but knew of the importance of regular attendance and the actions that the College takes where an individual student's attendance drops.

28 The College has recruited very low student numbers until the current academic session but students have been retained and achieved their full qualification. In 2014-15 one student was enrolled on the HND Business programme and achieved the qualification. In 2015-16 all eight students (on two programmes) achieved the qualification for which they were studying. In 2016-17 seven students were recruited to two programmes and remain on their programme. In 2017-18, 50 students were recruited to the Diploma in Education and Training Programme and 122 to the Higher National Certificate Business Programme. All of these students were still on programme at the time of the monitoring visit.

#### **4 Progress in working with the external reference points to meet UK expectations for higher education**

29 Some College policies refer to appropriate external reference points and the Quality Code. For example, the Recruitment, Selection and Admission Policy and Procedure refers to *Chapter B2: Recruitment, Selection and Admission of the Quality Code*, Supporting Professionalism in Admissions guidelines and the Higher Education Strategy UKVI 2. The Recognition of Prior Learning Policy refers to the Office of Qualifications and Examinations Regulation arrangements for the Qualifications and Credit Framework. The HND programme specification, which the College applies, refers to *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* Level Descriptors and relevant professional bodies. Staff showed an understanding of the Quality Code, and the appropriate external reference points relevant to their area of practice. For example, staff on the DET programme indicated that their teaching was informed by the Higher Education Academy's UK Professional Standards Framework and recruitment staff were familiar with *Chapter B2: Recruitment, Selection and Admission*.

#### **5 Background to the monitoring visit**

30 The monitoring visit serves as a short check on the provider's continuing management of academic standards and quality of provision. It focuses on progress since the previous review. In addition, it provides an opportunity for QAA to advise the provider of any matters that have the potential to be of particular interest in the next monitoring visit or review.

31 The monitoring visit was carried out by Mr Peter Hymans, Reviewer, and Mr Christopher Mabika, Coordinator, on 12 and 13 June 2018.

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