

Post-registration quality and standards assessment report for London Churchill College Ltd.

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Executive summary

Type of assessment	Post-registration quality and standards assessment.
For	London Churchill College Ltd.
Advice to the OfS	The Provider has resolved the concerns in the Quality and Standards Review completed at registration relating to condition B1, B2 and B4. There were no concerns relating to condition B5.

The Office for Students (OfS) has the power to apply to a registered higher education provider specific ongoing conditions of registration that the OfS considers desirable to mitigate increased risk of a future breach of general ongoing conditions.

Where risks are identified during registration related to quality and standards conditions B1, B2, B4 or B5, the OfS may apply a specific ongoing condition which provides for a quality and standards assessment to take place at a time after the provider's registration with the OfS. In line with the OfS's risk-based approach, the assessment is focused on the risks identified and whether the provider has responded to appropriately to concerns raised during registration.

As part of such assessments, the OfS appoints an assessment team, including external academic experts, to consider evidence and carry out a visit to the provider, after which it produces a report. The report does not take into account matters which may have occurred subsequent to that period.

- 1. This report is an independent assessment of London Churchill College's compliance with the Office for Students' (OfS) ongoing conditions of registrations for quality and standards: conditions B1, B2, B4 and B5.
- 2. The report shows the findings of an independent assessment team. It does not represent a decision by the OfS about the provider's compliance with these conditions of registration.
- 3. The Office for Students (OfS) requires all registered higher education providers' courses to meet a minimum set of requirements or conditions that relate to quality and standards. These detailed requirements can be found in the OfS's regulatory framework.¹
- 4. The Quality Assurance Agency for Higher Education (QAA) identified concerns about London Churchill College when it conducted a quality and standards review in September 2019, prior

¹ See OfS, <u>'Securing student success: Regulatory framework for higher education in England'</u>.

to its registration with the OfS.² The concerns are also detailed in the OfS regulatory case report for London Churchill from March 2022.³

- 5. London Churchill College currently offers a Level 5 Higher National Diplomas in Hospitality Management and Business Management in an agreement with Pearson. It taught out and discontinued a Level 5 HND in Health and Social Care in the academic year 2019-20 after the QAA raised quality concerns. London Churchill College is planning to offer HND Level 5 in Healthcare Professions' Support for England from academic year 2024-25.
- 6. The OfS appointed an assessment team in November 2023, which consisted of two academic expert assessors and a member of OfS staff. The OfS asked the team to consider evidence and to advise the OfS on the college's attendance and engagement strategies as well as student and employer support, particularly in work placement contexts. The appointed team mapped the concerns raised by the QAA on to OfS conditions of registration to produce lines of enquiry.
- 7. The team considered a range of information. This included:
 - a. Information already held by the OfS, such as data relating to student outcomes.
 - b. Information submitted to the OfS by London Churchill College, including information relating to student achievement and engagement, and programme specification documents.
 - c. Specific modules on the college's virtual learning environment (VLE).
 - d. Specific student support available to students on the student portal.
 - e. Information collected from staff and students at the college during one online and one face-to-face site visit.
- 8. The team visited London Churchill College online on one occasion in November 2023 via Microsoft Teams, and made a site visit in February 2024.
- 9. During the assessment, the team considered the 13 concerns from the QAA quality and standards review (QSR) from September 2019, and identified and developed lines of enquiry related directly to OfS ongoing conditions B1, B2, and B4.
- 10. In respect of the lines of enquiry established, based on the information it considered, the assessment team's view is that the college:
 - a. Has resolved the concerns raised in the QSR relating to condition B1 (Academic experience) from the date of publication of this report and has robust plans to ensure compliance with B1 when it starts delivering HND courses with work placements.

² See QAA, 'Quality and standards review for providers applying to register with the Office for Students: London Churchill College', available at Designated Quality Body in England, <u>'Assessment reports'</u>.

³ See OfS, 'Regulatory case report for London Churchill College Ltd: Specific condition BA'.

- b. Has resolved the concerns raised in the QSR relating to condition B2 (Resources, support and engagement) from the date of publication of this report and has robust plans to ensure compliance with B2 when it starts delivering HND courses with work placements.
- c. Has resolved the concerns raised in the QSR relating to condition B4 (Assessments and awards) from the date of publication of this report and has robust plans to ensure compliance with B4 when it starts delivering HND courses with work placements.
- 11. This report does not represent any decision of the OfS in respect of whether the college satisfies the initial conditions of registration.

Introduction and background

- 12. At the time that London Churchill College Ltd ('the college') applied for registration with the OfS, the initial and ongoing quality and standards conditions in effect were those set out in the 2018 Regulatory Framework. The OfS commissioned the QAA as the designated quality body to carry out QSRs at providers seeking to register. The method for such reviews was to assess the provider against the core practices in the March 2018 version of the UK Quality Code for Higher Education ('the Quality Code').⁴
- 13. In its report on London Churchill College Ltd, the QAA identified concerns in relation to some of the core practices. The OfS decided that the college complied with initial conditions B1, B2, B4 and B5, and registered the provider. However, the concerns set out in the report led the OfS to impose a specific condition of registration on London Churchill College Ltd, to mitigate risks in relation to its compliance with ongoing conditions of registration. The specific condition provided for a quality and standards assessment to take place after registration, to assess whether the provider had resolved the concerns raised.⁵
- 14. In May 2022, the new and revised ongoing conditions of registration B1, B2, B4 and B5 came into effect in a revised version of the regulatory framework. The revised conditions set out the requirements relating to quality and standards that are now in force for registered providers.⁶
- 15. Therefore, the OfS directed its assessment team to consider whether, with reference to the concerns raised in the QSR report, there were now any concerns regarding compliance with the revised and current conditions of registration.
- 16. To make the assessment, the team mapped the findings set out in the QSR where core practices were not met, and the current conditions of registration. This allowed the team to form initial lines of enquiry as it gathered evidence, to provide advise the OfS on the college's compliance with ongoing conditions of registration relating to quality.
- Currently, the college delivers two HND Level 5 courses. It delivers both full-time HND Level 5 Business and HND Level 5 Hospitality Management at its Barclay Hall building in East London, in an agreement with Pearson.
- 18. The Barclay Hall premises have a range of student support services, including a library, a careers service, and a wellbeing service with a dedicated wellbeing advisor on site. The college also provides each student with a dedicated personal tutor, who liaises with academic staff and the wellbeing officer to facilitate one-to-one academic support and pastoral support for students where necessary.

⁴ The May 2023 edition of the Quality Code contains the same text as <u>'UK Quality Code for higher education</u> <u>2018'</u>, though it includes an updated introduction which accurately reflects the regulatory position of the Quality Code following changes since 2018.

⁵ See QAA, <u>'Concerns about standards and quality in higher education: London Churchill College Ltd, May 2018' (qaa.ac.uk)</u>.

⁶ See OfS, 'Securing student success: Regulatory framework for higher education in England'.

- For overall context, London Churchill College had a student population of 1,550 in 2021-22.⁷ All 1,550 were undergraduate students enrolled on a full-time basis. 1080 of these 1,550 students were over the age of 31. 710 students were Asian, while 590 were white and 190 were black. 1,160 of the 1,550-student population were in Quintile 1 or 2.
- 20. Alongside these services, the college has recently appointed a dedicated work placements manager in preparation for the proposed delivery of the new Level 5 HND Healthcare Professions' Support for England, for which the college will recruit students to start from academic year 2024-25. The college halted delivery of courses with assessed placements in academic year 2019-20, to dedicate time to developing a new work placements support system with both students and employers. This system is now largely in place.

⁷ See OfS, <u>'Size and shape of provision data dashboard</u>'. Data dashboard'.

Assessment process

- 21. The assessment team considered the issues raised by the QAA's QSR. It mapped these concerns to OfS conditions to identify lines of enquiry (see the following section 'Analysis of the QSR' for mapping). The lines of enquiry provided the principal focus, but the assessors could raise wider concerns related to conditions B1, B2, B4 and B5 if they came up in evidence. The team gathered a range of information through an online visit on Thursday 23 November 2023, and a site visit on Thursday 8 February 2024.
- 22. The college submitted a narrative document outlining its response to concerns raised by the QAA, and in October 2023 provided course documentation, programme specifications and module outlines, and work placement handbooks.
- 23. During these visits the team undertook:
 - a range of interviews with academic and professional service staff
 - a range of student panel interviews across courses.
- 24. The team accessed to the VLE from 30 January 2024 until 30 February 2024. It made further requests for information and data based on discussions with staff and students during the visits, and on its analysis of information already provided. The college fulfilled all requests in a timely manner and provided the additional information and data on 15 February 2024.
- 25. The team first reviewed the documentation submitted by the college in October 2023, including the response to the QAA report findings in the form of a narrative document addressing each concern in detail. Based on this it decided to focus on work placement management, student support, student attendance and engagement data, and relevant policy implementation.
- 26. The team used the evidence collected to form a view on the areas within scope, as set out in the following section.

Analysis of the QSR

The team undertook an analysis of the QSR report to identify relevant lines of enquiry.

- 27. The assessment team's analysis of the QSR findings identified underlying issues related to poor or insufficient communication and a lack of effective relationship management, particularly in the delivery of courses with mandatory assessed work placements, between the college and key stakeholders namely work experience providers, staff, and students. According to the QSR, this contributed to a lack of understanding regarding stakeholder roles and responsibilities, and to ineffective record keeping.
- 28. This is relevant to the ongoing conditions of registration, as it relates to whether the students at the college are provided with a course that is 'effectively delivered' (B1.3.d) and receive 'resources and support for the purposes of ensuring a high quality academic experience' (B2.2.a.i) to 'succeed in and beyond higher education'(B2.2.a.ii).
- In addition, it is relevant to whether students at the college are 'assessed effectively' (B4.2.a), 'each assessment is valid and reliable' (B4.2.b) and 'relevant awards granted to students are credible at the point of being granted and when compared to those granted previously' (B4.2.e).
- 30. The lines of enquiry (LoEs) established from this process were:
 - a. **LoE1:** The efficacy of the college's processes for managing work experience providers, including processes for recruiting providers, logging providers and provider contacts, and maintaining a dialogue with providers. This maps to condition B1.
 - i. This line of enquiry is relevant to condition B1.3.d as it considers whether work experience providers that are delivering part of a course on behalf of the college are providing students with a course that is 'effectively delivered'; and B1.3.e as it considers whether such work experience providers are requiring students to develop 'relevant skills'.
 - b. **LoE2:** The college's processes for supporting students, including those studying taught modules at the college and those undertaking work experience placements. This maps to condition B2.
 - i. This line of enquiry is relevant to condition B2.2.a as it considers whether the college, and work experience providers that are delivering part of a course on its behalf, are providing each cohort of students with 'resources and support' sufficient for the purposes of ensuring a high-quality academic experience for those students and their success in and beyond higher education.
 - c. **LoE3:** The college's processes for recording student attendance on courses with mandatory assessed work placements and recording assessment results on such courses. This maps to condition B4.

- i. This line of enquiry is relevant to condition B4.2.a when considering the planned delivery of courses with mandatory assessed work placements; in particular the HND in Healthcare Professions' Support for England, which carries a mandatory requirement for students to complete 450 hours of work experience. Because of this, it is necessary for the college to have clear and robust processes for recording completion of work experience hours as well as assessment results for students on courses with mandatory assessed work placements.
- ii. The line of enquiry is relevant to condition B.4.2.a as it considers whether the college is ensuring that students are 'assessed effectively; to condition B4.2.b as it considers whether each 'assessment' is 'valid' and 'reliable'; to condition B4.2.c as it considers whether 'academic regulations' are designed to ensure that 'relevant awards' are 'credible'; and to condition B4.2.e as it considers whether 'relevant awards' granted to students are 'credible' at the point of being granted and when compared with those granted previously.
- 31. The full detail of the analysis of the QSR, and how the findings link to the lines of enquiry and relate to the B conditions, is shown in Annex A.

Assessment of matters relating to quality under ongoing conditions of registration B1, B2, and B4

Condition B1

- 32. In seeking to understand whether the college delivers 'a high quality student experience' for those students enrolled on courses with mandatory assessed work placements, the assessment team reviewed a range of evidence relevant to condition B1 (see Annex B for the full text of the condition). This included a review of whether the college has robust plans for the delivery of courses with mandatory assessed work placements in particular, the HND in Healthcare Professions' Support for England (HPSE) to be 'effectively delivered' (B1.3.d) and require 'students to develop relevant skills' (B1.3.e).
- 33. The initial information and documentation provided by the college and reviewed by the team included the following:
 - work experience policy
 - work experience operational manual
 - sample workplace visit checklist
 - employer's handbook
 - work experience manager job description.
- 34. During the on-site visit and online meetings, the team met the following:
 - college principal
 - vice principal academic
 - vice principal quality
 - company secretary
 - interim head of quality assurance
 - interim head of programmes and academic monitoring
 - academic registrar
 - student engagement manager
 - student engagement and welfare officer
 - head of data and information technologies
 - personal tutors
 - HND tutors

- course coordinators
- HND students.
- 35. These meetings included discussion of topics relevant to whether current and intended courses are or will be 'effectively delivered' (B1.3.d) and require 'students to develop relevant skills' (B1.3.e).
- 36. The assessment team reviewed VLE sites, including samples of teaching resources, guidance to students, and organisation of the sites themselves to consider whether this information supported courses being 'effectively delivered' and allowing students to develop 'relevant skills'.
- 37. The college sent the team the link to the Pearson programme specification for the HND HPSE, so that all other information could be reviewed in the context of the specified aims and learning outcomes for the course.
- 38. The team's review drew on multiple relevant sources of information, as identified above. Following a risk-based approach, the team considered the areas set out below.

Line of enquiry 1

The college's processes for managing work experience providers, including processes for recruiting providers, logging providers and provider contacts, and maintaining a dialogue with providers. This maps to condition B1.

- 39. The team examined the college's plans to provide students with high quality work experience when enrolled on a course with a mandatory assessed work placement, and the systems and support processes associated with the delivery of such placements. The team sought to evaluate the delivery and support strategies developed by the college with work experience providers for mandatory assessed work placements, including placement provider recruitment, communication and support. These matters are particularly relevant to condition B1.3.d, which requires that 'each higher education course is effectively delivered', and to condition B1.3.e, which requires 'students to develop relevant skills'.
- 40. The college stated that it does not currently offer any courses with a work experience placement. The principal advised that following the QAA report, the college decided not to run any courses with placements until the systems and support processes are in place to do so. The assessment team therefore sought to establish the processes that the college has put in place to ensure the effective delivery of courses with mandatory assessed work placements in the future.
- 41. The college's senior team explained that the college was currently undertaking a stakeholder review to ensure it consults all stakeholders fully and involves them in drawing up necessary processes to facilitate students having high quality work experience in future courses with mandatory assessed work placements. The members of the college's senior team acknowledged the crucial role the employer provides in the delivery of courses with such placements and recognised that in previous such courses there had been a lack of discussion

with employers. They explained how this had led them to create a new work experience policy document.

- 42. The team reviewed the college's work experience policy document. The college informed the team that it recruited a work experience placement manager (WEPM) in October 2023, whose responsibilities include collaborating with employers to identify work placement opportunities, as well as overseeing and reporting on students' progress in their mandatory assessed work placements.
- 43. The college explained that under the proposed revised work experience policy, it will require students at interview stage to commit to undertaking a mandatory work placement, and will inform them that the college will monitor their work placement to ensure they achieve their award. The work experience policy sets this out and the work experience operational manual outlines its practice, covering the now taught-out BTEC Level 5 HND in Health and Social Care.
- 44. The college will tell students about the student code of conduct they must follow, both in college and when undertaking work experience, and will explain this during induction and in pre-placement training. Personal tutors undertake the pre-enrolment academic interviews with students, and the engagement team run induction. The work experience policy lays out students' responsibilities while on placement. The team noted the college's plans for providing multiple opportunities to make students fully aware of their personal responsibilities.
- 45. Although it is each student's responsibility to secure employment for a specific work placement, the college plans to secure multiple opportunities for work experience placements through its network of providers, in addition to the option of students arranging their own work experience. The college has existing relationships with parts of the NHS and has diversified its board of directors to include individuals with professional connections with healthcare provision. Individual members of the college's senior team also have professional connections with healthcare providers.
- 46. The work experience policy document details the college's plans to expand its network for work experience opportunities as well as work-related extracurricular initiatives. The college confirmed it has put in place several extracurricular initiatives to support students in finding employment, such as CV writing workshops, and plans to make these activities compulsory, embedding them into the curriculum when the college delivers courses which have a mandatory assessed work placement requirement.
- 47. The college explained that it plans to recruit work experience providers through known contacts, and it intends that the WEPM will work with alumni to add additional employers to the college's existing list. This is reflected in the job description of the WEPM, which states that the 'role involves collaborating with employers to identify job opportunities.' The opening of the new college building in Barking will offer further opportunities for the college to connect with local providers, who will be able to offer students suitable work experience. The college has some existing relationships with the NHS and has previously arranged for NHS guest speakers to come into classes and for students to benefit from field trips. It hopes to continue this relationship when it resumes delivery of healthcare courses with a mandatory assessed work placement requirement.

- 48. The college has plans to record work experience providers, including employers, on its records management system. The team saw a general overview of the records management system during its site visit. The college plans to subject all employers, including those that have previously employed students, to health and safety checks to ensure the placement is safe. The college's academic team will determine whether a work placement is of a suitable quality and will enable the student to meet the required learning outcomes, ensuring the student is developing relevant skills. The work experience operational manual documents this practice for the now taught-out BTEC Level 5 HND in Health and Social Care.
- 49. The college has plans for a work-based learning team, as shown in the college organogram included in the college's narrative document, which will be responsible for looking at logistics and the safeguarding processes of the work experience provider. At present, only the work experience placement manager is in post. Once the college has agreed a placement in principle, the WEPM will complete a prescribed set of placement checks using a checklist. A sample visit checklist provided by the college shows that the placement checks will ensure core health and safety policies and practices are in place and will ensure that the employer has provided an induction and has adequate plans for training.
- 50. The college asserted that all employers will receive a physical visit from the work-based learning team prior to any work experience placement starting. This is laid out in the work experience policy. Part of the purpose of this visit will be to make sure employers are aware of their responsibilities and that they complete the relevant sections of the work placement handbook. The college has not yet created this handbook, but it will use a revised version of the document produced and provided by the college for previous courses, based on the work experience operational manual but of a more appropriate and user-friendly length. A placement will only go ahead once the WEPM has completed the necessary checks satisfactorily, and the student has completed the work experience information form.
- 51. It is the assessment team's view that these plans are sufficiently robust for the college to be confident, prior to the commencement of a work experience placement, that it will be 'effectively delivered'. By recruiting a WEPM who will take responsibility for oversight of assessed work placements and committing to providing detailed handbooks for employers to outline work placement requirements and responsibilities, the college is demonstrating a commitment to manage its relationships with placement providers effectively.
- 52. The team also concludes that the plans are sufficiently robust for the college to be confident, prior to the commencement of a work experience placement, that it will be of sufficient quality to allow the student to develop relevant skills. By recruiting a WEPM who will take responsibility for ensuring work placements are of a sufficient quality and standard prior to allowing a student to accept the role, the college is ensuring the placement position provides the opportunity for a student to achieve the required learning outcomes.
- 53. A student on work placement will have regular meetings with their work experience provider. The college confirmed it will strongly advise employers to provide students with a placement supervisor with whom they should meet monthly to discuss their progress in the workplace. While on placement, the student will continue to have weekly meetings with their college personal tutor. These weekly meetings will review attendance and progress in the placement. The personal tutor will relay any placement-related concerns to the work-based learning team, whose responsibility is to resolve any issues and to upload information, including attendance,

to the student management system. The work-based learning team will review student records through the student management system, to ensure that students complete allocated required hours.

- 54. The employer must meet with students on a monthly basis to review progress including attendance. The employer will sign off attendance on a sign-off sheet. The placement provider will send the sign off sheet to the WEPM, who will upload attendance to the student management system. These are the processes outlined in the now taught-out BTEC Level 5 HND in Health and Social Care. In terms of disciplinary matters or other serious issues in the workplace, the college may issue students with a warning or potentially suspend them from their work placement.
- 55. The college informed the assessment team that it will manage any cases of students unhappy on their placement on a case-by-case basis. The work-based learning team will liaise with the employer and the student to achieve a satisfactory outcome, which may include finding an alternative placement. The college asserted that if a student subsequently reports a poor experience while on placement it will investigate. Other than the work experience document policy, no documentation currently in place provides detail for employers or students on their responsibilities and roles in the placement. However, the college asserts that it will include this detail in the employer and student handbooks it is currently creating.
- 56. Overall, the team did not identify any concerns in relation to the quality or credibility of the college's plans to ensure it will provide students with high quality work experience placements that are 'effectively delivered' and allow them to develop relevant skills.
- 57. The college has proactively taught out all courses with mandatory assessed work placements according to the concerns raised in the QSR report, and therefore the original concerns are no longer valid. It is the team's opinion that the college's future delivery plans for courses with mandatory assessed work placements are well reasoned and credible. The college has appointed a work-based manager, and plans to recruit a work-based team, whose responsibilities will include regular communications with employers to ensure that the curriculum's work experience requirements and that students develop relevant skills. In addition, the college has drawn up a new work experience policy and is committed to producing detailed work placement handbooks for both employers and students.
- 58. The team is satisfied these plans are sufficient for ensuring that future mandatory work-based placement opportunities will allow students to achieve the necessary learning outcomes.

Condition B2

59. The assessment team reviewed a range of evidence relevant to condition B2 (see Annex B for the full text of the condition) to understand whether the college ensures it provides each cohort of students with 'resources and support' sufficient for the purpose of ensuring a high quality academic experience for those students (B2.2.a.i), and that those students succeed in and beyond higher education (B2.2.a.ii). The team reviewed policy and associated documentary evidence relating to academic support for students and sought assurances that the college is providing, or plans to provide, the physical resources and the staff to support students' academic requirements, at a programme, module, and personal level. The team sought to establish whether the college has robust plans for ensuring provision of resources

and support on the delivery of courses with mandatory assessed work placements, in particular, the HND HPSE, to which the college seeks to recruit students for January 2025.

- 60. The initial information and documentation provided by the college and reviewed by the team included the following:
 - student engagement group meeting agenda 28 September 2023
 - student attendance policy
 - workplace visit check list
 - action plan student attendance and retention
 - the quality cycle
 - English language assessor job description
 - student engagement group meeting minutes
 - student engagement manager
 - HND in hm group x evening_weekdays sept 2023
 - learning resources centre and user guide
 - college student sms portal
 - job description student welfare officer
 - academic board agenda
 - personal tutoring and enabling student development policy
 - workplace operational manual
 - sample workplace visit checklist
 - work-based learning student tracking system
 - work experience manager job description
 - work experience operational manual
 - work experience policy
 - job description personal tutor
 - personal tutoring and enabling student development policy and the role of the personal tutors.
- 61. During the on-site visit and online meetings, the team met the following:

- college principal
- vice principal academic
- vice principal quality
- company secretary
- interim head of quality assurance
- interim head of programmes and academic monitoring
- academic registrar
- student engagement manager
- student engagement and welfare officer
- head of data and information technologies
- personal tutors
- HND tutors
- course coordinators
- HND students.
- 62. The college also provided the means for the team to review VLE sites, including samples of teaching resources, guidance to students, and organisation of the sites themselves.
- 63. The review of information and documentation provided by the college, topics discussed in meetings, and review of the VLE sites are relevant to condition B2.2.a and consider whether students receive 'resources and support' sufficient for the purpose of ensuring a high quality academic experience for those students (B2.2.a.i), and whether those students succeed in and beyond higher education (B2.2.a.ii). This included a review of whether the college has robust plans to provide resources and support for future students on courses with mandatory assessed work placements.
- 64. The team's review drew on the multiple relevant sources of information identified above. Following a risk-based approach, the team considered the areas set out below.

Line of enquiry 2

The college's processes for supporting students, including supporting students studying taught modules at the college and supporting students undertaking work experience placements. This maps to condition B2.

65. The team examined the college's processes for supporting current students, and to support future students, on courses with mandatory assessed work placements. This was done through the consideration of documentary evidence and discussion with college staff and

students. The review of the documentation, VLE and meetings with staff and students from across the college indicated that the programmes of study are up to date, and that the module teachers and the personal tutors work together to ensure that the curriculum is contemporary, equipping students with the ability to succeed in and beyond higher education.

- 66. Current students confirmed that they receive high levels of support and described the approach to their learning as well-structured and flexible in terms of meeting their needs.
- 67. Course coordinators informed the assessment team that there is regular updating of resources incorporating feedback from students, which then helps them to establish any support students might require. This included student feedback influencing assessment design and assessment support for students. The module tutors also described the ways in which the classes are creative and based around educational challenge to support students' academic progression. This included examples of typical class activity, showing the development of academic and wider skills for the workplace designed to increase confidence and problem-solving skills.
- 68. Students corroborated this, and confirmed that they feel there is academic stretch in their classes, and they can recognise and monitor their own academic and personal development. They highlighted support with their assessments from both their tutors and their personal tutors as excellent and easily available, and described feedback as prompt and helpful. Personal and HND module tutors discussed the college's approach to student support, including examples of its blended learning style, which includes lectures and workshops. They also stated that the online induction is an important signposting event, which students attend consistently well. when asked by the team about engagement from students, course coordinators asserted that they have group meetings online and student attendance is 100 per cent.
- 69. All college staff who the team spoke to during the visits focus on a collaborative approach to student support, which is beneficial to the holistic student experience. The college's collaborative working practice refers to ways in which module tutors and personal tutors work together on the delivery of the curriculum and support to students, as outlined in the personal tutoring and enabling student development policy. In discussion with the team, current students confirmed that this approach works well.
- 70. During both visits, the college outlined the importance of collaborative practices among staff to ensure consistency in support to students in the delivery of taught programmes. Course coordinators confirmed measures are in place to ensure that students receive clear support, and asserted to the team that course coordinators consistently monitor the student experience and quality of teaching.
- 71. Students' feedback to the team corroborates this, demonstrating clear communication from the college to students as well as joined-up delivery, which result in students having access to tailored support whenever they need it. All students spoke very highly of the support provided by the college, especially of their personal tutors. Students said they felt 'listened to' and 'respected'.
- 72. The college stated that it will use a similar collaborative approach for students on courses with mandatory assessed work placements. The college's work experience policy outlines this,

detailing the planned communications and channels that it will use to monitor and support students on placement. An example of such collaboration includes the workplace visit checklist, which outlines the required preparations for the placement, and which the student, employer and work-based learning manager must all sign. The college also provided a written outline of due diligence and consideration of students' rights while in the workplace. The college explained that the newly appointed work experience manager has an important role in this approach, to ensure that collaborative working with employers facilitates the support offered to students.

- 73. The college outlined the importance of personal tutoring in ensuring that it fully understands and responds to support needs of students. All college parties identified personal tutoring as crucial to student support, in that it helps students' academic development and supports wellbeing, which aids student progression through taught modules. Support for progression is part of the personal tutor's role according to the college's personal tutoring and enabling student development policy, and the personal tutor job description outlines the requirements of monthly reporting by each personal tutor.
- 74. The personal tutors described how they conduct personal tutoring both online and face-to-face in small groups, and with individuals during one-to-one meetings, offering academic skills support and considering ways in which they can support further development. Students confirmed this practice works well. The personal tutor role is to give support with assessments and guidance via the VLE, and to collaborate with academic and professional staff to ensure high levels of pastoral, academic and professional support across the college.
- 75. Course coordinators confirmed their role in overseeing that the college supports students well during their modules. The course coordinators explained that they have an overarching role, bringing together the support for students from across the programme teams. They also outlined how they will aim to offer similar support to students when they prepare for and undertake their work experience placements, and stated that they do not have any concerns around the practicalities of this. They described their oversight of the curriculum, which included checking module guidance in terms of session development, delivery and assessment.
- 76. The course coordinators will be part of the academic team that will determine whether a placement can enable a student to meet the required learning outcomes. They also described how they mentor academic tutors and carry out teaching observations to ensure that the college teaches all modules to an acceptable standard. Additionally, they provide oversight of quality assurance and ensure appropriate interaction with external examiners, including being responsive to any areas for development. The module tutors corroborated that the role of the course coordinators is to bring together all aspects of support to students.
- 77. The module tutors outlined their roles in the delivery of curriculum in relation to student progression and performance during their learning. They provided the assessment team with an account of the curriculum and stated that they follow the validating partner's content guidance. The use of such guidance had previously been outlined as a standard. The college confirmed that module leaders are all specialist lecturers, and they are named in the assignment briefs and the module handbooks.

- 78. The module tutors are responsible for how the college teaches employability skills, and logically link them to the curriculum and integrate them into taught sessions to provide students with development opportunities. Students confirmed that the college adequately prepares them for employment and that they appreciate the support that the college offers with CVs, interview techniques and employability.
- 79. While the college is not currently offering courses with mandatory assessed work placements, it plans to develop this as part of its future offer to students. In terms of the organisation of work placements and preparatory support for students undertaking such placements, the college outlined work that it currently undertakes in terms of preparation for the workplace and career development. As part of the reinstatement of mandatory work experience placements, the college stated that it plans to offer additional guidance to students around behaviour and workplace codes of conduct, to ensure the students are fully aware of the expectations that will be placed upon them while they are in their placement. The work experience policy states that students are responsible for meeting the norms and expectations for professional conduct in the field of work or study that they are undertaking.
- 80. Course coordinators outlined ways in which they support students to create a personal development plan portfolio, based on developing a reflective approach that will support further development of practical, academic and personal attributes and skills. For students on courses with mandatory assessed work placements, the college plans to have mechanisms in place for students to feed back to their personal tutor and the work experience manager on their satisfaction levels with their placement preparation in terms of developing relevant skills and knowledge. This feedback will be given in a weekly meeting between the student and the personal tutor.
- 81. The college also plans to have mechanisms in place to consider conduct in placement and to raise safeguarding concerns. The college stated that it considers itself well prepared for supporting students on assessed work placements as part of its future delivery of HND HPSE.
- 82. As part of the college's plans to reinstate work experience placements as part of its curriculum offer, it has employed a work experience placement manager. At the time of the online visit on 23 November 2023, the WEPM had been in post for one month. Their job description demonstrates the role's oversight for placement quality prior to commencement, as well as the coordination of feedback from both employers and students. The college described this role as significant in ensuring that the students have effective support in the assessed work placements, and can gain relevant knowledge and skills through the experience.
- 83. The college acknowledged that for student success on courses with mandatory assessed work placements it will be important to have effective communications between it and the work experience or work placement provider. It identified the importance of a workplace supervisor to support students to ensure that students make suitable progress during placements. The college confirmed that it will provide support to the workplace supervisor, and in-person guidance and a written guide to support this role. The college expects that the employer placement supervisor meets their assigned students each month to support their development during the placement. The college's employer handbook outlines this process.
- 84. In addition to support provided through the monthly meetings between the student and workplace supervisor, the college's work experience policy states that personal tutors must

have one-to-one weekly meetings with their tutees and report any issues back to the workbased learning team. During meetings with personal tutors, the assessment team was reassured the personal tutors were aware of these plans. Personal tutors meet regularly with their students, so the plans for meeting regularly with students on mandatory assessed work placements are seen as an extension of the college's current practices. This aims at ensuring collaboration between the college and the workplace, to ensure that the college supports students well. The college confirmed there will be a telephone hotline available for support for all placement students.

- 85. The college confirmed the academic team will take responsibility for monitoring the quality of the placement, including logistics and safeguarding. Health and safety measures will be agreed with employers and are included on the checklist that will form part of the checking process prior to the college allowing any student to commence a placement. The college explained that all employers undergo the same checks, irrespective of whether students are already working for them.
- 86. During the site visit, the team asked for clarification on the support offered to students with regards to careers. The college stated that it provides careers guidance to support students and prepare them for work placements. The college outlined the input for careers, including CV writing and preparation for interviews, stating that once it is running courses with placements these sessions will be compulsory, including pre-placement training relating to professional behaviours, and the sessions on the world of work currently offered by the careers team, which prioritise CV writing and mock interviews.
- 87. The college also stated that it provides a job hub service, which gives one-to-one careers advice and advertises employment opportunities for students. The college outlined that it regularly engages with guest lecturers from the healthcare sector, and has an employers' forum, which it uses to create shared expectation around work experience. The college asserted to the team that its career services support students to be 'industry ready', with a focus on developing transferable skills. The college outlined how the careers services currently offer career drop-in sessions, advice on employability and CV writing, and business pitching skills workshops for those who want to become self-employed. Students self-select to attend the drop-in sessions that relate to securing a job. Course coordinators added that students prepare for a mock interview where they have to consider their professional identity and current skills set.
- 88. The college commented that it has developed several strategies to address employability, including networking and alumni and student engagement. The work experience manager deals with this and is responsible for gathering responses from potential employers. The college is planning employability events, but has not yet hosted any. The college will assess any workplaces where students are already employed when they enrol, to ensure they meet work-based experience requirements. Students complete the work experience information form at induction stage, so the college can capture those students who are already working. Part of students' academic interview enquires about employment, so the college can capture this information very early on.
- 89. Overall, the assessment team does not have any concerns in relation to students receiving 'resources and support' sufficient for the purpose of ensuring a high quality academic experience (B2.2.a.i), and that those students succeed in and beyond higher education

(B2.2.a.ii). This includes supporting students undertaking work experience placements. The team concludes that the college is providing current students with the necessary resources and support to ensure they receive a high quality academic experience and can succeed in and beyond higher education.

- 90. Based on the documentary evidence and conversations with the college staff, it is the team's view that the college has both put resources in place, and has credible plans, to provide necessary support to future students undertaking courses with mandatory assessed work placements. While the work experience placement manager role will be central to ensuring a successful ongoing dialogue with work placement providers, the input from personal tutors, course co-ordinators and the student engagement team provides evidence there is a full team approach to student support. It is the team's view that the college is committing sufficient resources both in terms of specialist staff and development of policy, handbooks and partnerships to ensure this is successful.
- 91. Based on the documentary evidence provided, the VLE, and discussions with module tutors and personal tutors, with oversight from course coordinators and confirmation from current students, the team concludes that support to students is robust and ongoing, because the evidence which all the stakeholders provided across the meetings reflects positive experiences. There is clear triangulation of information among the college teams supporting a coherent account, which the students confirmed through their highly positive commentary about their experiences and the staff and resources to support them.

Condition B4

- 92. The assessment team reviewed a range of evidence relevant to condition B4 (see Annex B for the full text of the condition), in seeking to understand whether the college has robust plans to ensure that students on mandatory assessed work placements are 'assessed effectively' (B4.2.a), that each assessment is 'valid and reliable' (B4.2.b), that academic regulations are designed to ensure 'relevant awards' are 'credible' (B4.2.c), and that relevant awards granted to students are credible at the point of being granted and when compared with those granted previously (B4.2.e). This relates in particular to the HND in Healthcare Professions' Support in England, which has a mandatory requirement for students to complete 450 hours of work experience. If the student does not complete the full 450 hours, they cannot receive the diploma. It is therefore necessary for the college to have clear and robust processes for recording attendance and assessment results for these students.
- 93. The initial information provided by the college, and reviewed by the team, included the following:
 - work-based learning student tracking system
 - student attendance policy
 - work experience operational manual
 - work experience policy
 - the quality cycle

- average performance rating portal
- jan 23 assessment moderation
- assessment and progression board
- sample final assessment board meeting minutes 18 January 2023
- 2023 HND hm report
- progression and completion policy
- 94. This initial information is relevant to the assessments on the courses under consideration being 'effective', 'valid' and 'reliable', and the credibility of relevant awards at the point of being granted and when compared with those granted previously.
- 95. During the on-site visit and online meetings, the team met the following:
 - college principal
 - vice principal academic
 - vice principal quality
 - company secretary
 - interim head of quality assurance
 - interim head of programmes and academic monitoring
 - academic registrar
 - student engagement manager
 - student engagement and welfare officer
 - head of data and information technologies
 - personal tutors
 - HND tutors
 - course coordinators
 - HND students.
- 96. The review of information and documentation provided by the college, and the topics discussed in meetings, were relevant to condition B4.2, that students are 'assessed effectively' (B4.2.a), that each assessment is 'valid and reliable' (B4.2.b), that academic regulations are designed to ensure 'relevant awards' are 'credible' (B4.2.c), and that relevant awards granted to students are credible at the point of being granted and when compared with those granted previously (B4.2.e).

97. The team's review drew on the multiple sources of relevant information identified above. Following a risk-based approach, the team considered the areas set out below.

Line of enquiry 3

The college's processes for recording student attendance on courses with mandatory assessed work placements and recording assessment results on courses with mandatory assessed work placements. This maps to condition B4.

- 98. The college outlined its standard processes for attendance monitoring. The college explained it has systems for recording attendance in classes on campus, outlined in the student attendance policy. This states that module tutors must take registers at the start of each class and upload them to the student monitoring system. Providing a student arrives within 15 minutes of the start of the class, the module tutor marks them as present. If a student arrive within 30 minutes late, the module tutor marks them as absent. Module tutors confirmed they follow this process. Once a student is logged as absent on the student monitoring system, this triggers an automatic text message to that student, and the system sends them an email to inform them that the college is aware they are absent, and to ask them to explain their absence.
- 99. Students confirmed that this process works well, and they were able to recall individual experiences of receiving the automated messages. The students expressed positive feelings about this process, including feeling reassured that they receive a reminder if they forget to turn up to class. One student recounted her experiences of a situation when this occurred and, receiving the text message, she went to college, albeit late, to attend a class she had forgotten was on her timetable. Where student absence is due to mitigating circumstances, students must complete a mitigating circumstances form.
- 100. The student attendance policy outlines the college's processes for managing absence and the interventions that the college undertakes. Based on discussions with the college's personal tutors, the team's view was that the personal tutors know and follow these processes. The college verbally reported that attendance levels of current cohorts of students are around 70 per cent.
- 101. The assessment team sought to understand the college's plans for recording and monitoring attendance for students undertaking mandatory assessed work placements, given that attendance is a necessary requirement for receiving the award. Following scrutiny of the Pearson programme specification for the HND HPSE, the team noted the requirement for the college to record work experience hours and to link them to learning outcomes.
- 102. The college outlined the importance of taking a joint approach to work experience, which includes ensuring placement providers and learners have a clear understanding of the learning outcomes related to the placement, including the attendance requirement. The college will create a tripartite agreement between the college representative, the placement provider and the student, to ensure clarity around roles, responsibilities and support to learners.

- 103. The employers' handbook details the stipulations around the number of hours to be carried out and the learning which students will undertake. The college makes students aware of the expectations of attendance, notification of non-attendance and the paperwork to record their attendance both at induction and prior to the placement commencing. The attendance sheet that the student must complete and that the employer must sign is included as appendix B in the college's employers' handbook.
- 104. Personal tutors stated that students on placement will have a weekly one-to-one with their personal tutor. They explained that this will include a review of attendance, experience, and progress to date. Personal tutors upload notes from these meetings to the student monitoring. The work experience operational manual, which outlines how the college managed the work experience requirement in the now taught-out BTEC Level 5 HND in Health and Social Care, details a weekly review of placement attendance and progress between the personal tutor and student. For future courses with mandatory assessed work placements, in addition to weekly meetings between the personal tutor and student, the college's senior team will monitor work placement attendance on a monthly basis. The work experience policy does not document this formally, but it does explain that the student engagement group will formally report on work experience to the principal's executive group at least once every semester.
- 105. The college explained that, should a student have mitigating circumstances while on a work placement, the college will involve the employer in finding a solution to ensure the student can carry out the mandatory assessed work placement and meet the necessary learning outcomes. If a student misses placement hours, the college will categorise that student as being 'at risk', and will put in place a necessary intervention plan to support them to achieve the required placement hours and learning outcomes. The college is confident that its plans for monitoring and recording attendance are such that it will not be possible for a student to miss placement hours and for the college not to be aware of this.
- 106. The college explained its practice of assessment design, and particularly its plans for assessment design for the HND HPSE. It explained that the curriculum and scheme of work, along with the learning outcomes and required skills, are already specified by the validating partner in the programme specification. Following the standard college assessment design practice, the college's academic team will design assessment for the HND HPSE to ensure students have the opportunity to meet the required learning outcomes. It will be internally verified before verification by the validating partner.
- 107. As an example, the college talked the team through the current assessment design for the Personal and Professional Development module of HND Hospitality Management, which involves a practical element (mock interview) followed by a reflection task and further self-assessment. The college stressed its view of the importance of self-reflection in achieving valid and reliable assessment, stating its belief that it is a core professional skill and one where it can have confidence students are submitting their own work, as reflective writing is difficult to produce using artificial intelligence software.
- 108. During the site visit, the college spoke about shared expectations of placement between the student and the work placement provider, which both parties will discuss prior to the commencement of any work placement, and which form part of the tripartite agreement between the college (work-based learning manager or tutor), the employer (or representative) and the student.

- 109. Prior to any work placement commencing, the college will subject all employers, including those where the student has previously been employed, to health and safety checks to ensure the placement is appropriate for the purposes of the course. The college's academic team will determine whether a work placement is of a suitable quality and provides sufficient opportunity for the student to develop the relevant skills that will enable the student to meet the required learning outcomes.
- 110. Before any work placement starts, the college will issue both the student and the employer with work placement handbooks. The college is currently creating the student work placement handbook, which it informed the team will include opportunities for the student to document reflective accounts of their work practice, to track their progress towards the work placement assessment. The current employers' handbook includes an example of this, which details the requirements for employers supervising students on the now taught-out BTEC Level 5 HND in Health and Social Care.
- 111. The team sought to understand how personal tutors will work with the college work-based learning team. It learned that as well as monitoring attendance, personal tutors will meet students on a weekly basis to review the placement progress to date and ensure the student is on track to meet the necessary learning outcomes. The work experience policy, and the practice outline in the work experience operational manual for the now taught-out BTEC Level 5 HND in Health and Social Care, document these details.
- 112. This plan is in line with the qualification specification for the HND HPSE, which details the requirement to ensure students feel motivated to work towards and understand the requirements for their assessments. The personal tutor will upload notes from the meetings between the personal tutor and student to the student monitoring system. It is the responsibility of the WEPM to monitor overall student progress and performance on mandatory assessed work placements, and to ensure that the college follows processes related to work experience. Monthly meetings will take place between the work placement team and the academic team, where all participants will discuss the status of student work experience along with any necessary action plans and progress against action planning.
- 113. The WEPM will formally report to the student engagement group (SEG) on the overall progress of students on mandatory assessed work placements. This will include the ability of students to meet required learning outcomes. The SEG meets at least once per semester. The assessment team reviewed an example of an SEG agenda and minutes, where there is currently a standing agenda item covering careers as well as an agenda item seeking feedback directly from student representatives. Students' feedback on work placements can be accommodated within either of these items, or can be included as a separate agenda item. The SEG shares its minutes with the principal's executive group.
- 114. It is the team's view that, should there be any concerns regarding students on future courses with mandatory assessed work placements, the college has robust procedures in place to ensure the senior team will be made aware of concerns, either through the formal sharing of SEG minutes or through monthly meetings between the academic team and work experience team.
- 115. In addition to regular weekly meetings between personal tutors and students where the college and the student capture progress towards assessment, the college outlined its plans

for the WEPM to have at least one progress check-in with employers once work experience placements are underway. This reflects the practice outlined in the work experience operational manual for the now taught-out BTEC Level 5 HND in Health and Social Care. It is the team's view that the college understands the need for capacity and quality assurance around placements to ensure that the student can complete the programme of study and be granted the award. The college confirmed that its standard progress and completion policy will apply to students on courses with mandatory work experience placements. The progress and completion policy itself refers to other, now taught-out courses that had mandatory assessed work placements.

- 116. In meetings with the team, students agreed and confirmed that they have a high level of support from the college and are confident of being able to monitor their own progress. They stated that they have high levels of access to tutors and personal tutors, and know where to get support according to the progression and completion policy.
- 117. Overall, the assessment team concludes that the college has robust plans to ensure students on mandatory assessed work placements are 'assessed effectively' (B4.2.a), which includes a mandatory attendance requirement forming part of the assessment. The college has both a process and a reporting system in place for recording and monitoring attendance, which the team observed is working well. The college has clear plans for extending its use to record and monitor attendance for students on mandatory assessed work placements; therefore it was the team's view that the college has the mechanisms in place to ensure that it logs and monitors mandatory work placement hours effectively and accurately. In addition, the team concludes that the working practice of the personal tutors is sufficiently robust and consistent to ensure that attendance on mandatory assessed work placements will be monitored and managed with the same level of rigour applied to current cohorts of students.
- 118. The team was satisfied the college has robust internal practices for assessment design. Since Pearson, as the validating partner, must verify the college's proposed assessment design for the HND HPSE, the team is confident that future students enrolling on the HND HPSE will be assessed effectively and that assessment will provide the opportunity for students to demonstrate the required learning outcomes.
- 119. The team concludes that the college's plans are robust and will ensure that each assessment is 'valid and reliable' (B4.2.b). The college recognises the crucial role the employer plays in the delivery and assessment of courses with mandatory assessed work placements, and therefore has a clear intention to form a tripartite relationship between the college, the student and the employer to ensure that all assessment relating to the work placement is both valid and reliable.
- 120. The team's view is that in establishing a work experience team, appointing a work experience manager and providing a clear work experience policy, the college has provided a strong foundation for building the tripartite relationship with employers and students that was outlined in both online and site visit meetings. The team concludes that the mechanisms outlined for reviewing and recording individual student progress with employers and students during work placements are robust, and thus that the college can ensure that each assessment is valid and reliable.

121. The assessment team concludes that the college's academic regulations are designed to ensure that relevant awards are credible (B4.2.c) and that relevant awards granted to students are credible, at the point of being granted and when compared with those granted previously (B4.2.e). The team was satisfied that the college has clear and robust current processes for progression and completion, and therefore it was the team's view that college has the mechanisms in place to ensure future cohorts of students on courses with mandatory assessed work placements will be supported through progression and to completion of their course, to be able to qualify for their award.

Annex A: Analysis of the quality and standards review

Notes

Line of enquiry 1: The college's processes for managing work experience providers, including processes for recruiting providers, logging providers and provider contacts, and maintaining a dialogue with providers.

Line of enquiry 2: The college's processes for supporting students, including supporting students studying taught modules at college, and supporting students undertaking work experience placements.

Line of enquiry 3: The college's processes for recording student attendance on courses with mandatory assessed work placements and recording assessment results on courses with mandatory assessed work placements.

S3: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the standards of its awards are credible and secure irrespective of where or how courses are delivered or who delivers them.

Q8: Where a provider works in partnership with other organisations, it has in place effective arrangements to ensure that the academic experience is high-quality irrespective of where or how courses are delivered and who delivers them.

QSR finding	Wording	Relates to OfS conditions	Lines of enquiry pursued in connection with OfS conditions
S3 finding 1	The college does not manage its relationships with placement providers effectively.	B1.3.d	LoE1
S3 finding 2	The college does not discharge its responsibilities for enabling students to have appropriate opportunities to achieve required learning outcomes.	B1.3.d	LoE1
S3 finding 2	As above	B2.2.a.ii	LoE2
S3 finding 3	The college does not ensure that staff, students and providers of work experience understand their respective roles and responsibilities in relation to work experience and learning outcomes expected.	B1.3d	LoE1
S3 finding 3	As above	B2.2.a.ii	LoE2

Q9: The provider supports all students to achieve successful academic and professional outcomes.

S3 finding 4	The college does not have a robust approach to securing standards delivered in partnership with providers of work experience for those students on the HND in Health and Social Care.	B1.3.d	LoE1
S3 finding 4	As above	B2.2.a	
S3 finding 4	As above	B4.2.e	LoE3
S3 finding 5	While it has relevant policies and procedures in place, these are not implemented as intended.	B1.3.d	LoE1
S3 finding 5	As above	B2.2.a.i	LoE2
S3 finding 5	As above	B4.2.a	LoE3
Q8 finding 1	The college does not have effective and comprehensive arrangements in place to ensure a high quality work experience for those students for which this is a mandatory requirement of their programme (the HND in Health and Social Care) which therefore presents a risk to quality.	B1.3.d B1.3.e	LoE1
Q8 finding 1	As above	B2.2.a.i	LoE2
Q8 finding 2	Students do not always provide employers' details when they obtain work experience.	B1.3.d	LoE1
Q8 finding 3	Some students are known to be undertaking work experience without appropriate contact with supervisors to conduct suitability checks, risk assessments and to provide support.	B1.3.d	LoE1
Q8 finding 3	As above	B2.2.a.i	LoE2
Q8 finding 4	It is not clear how the college processes assessment results for Unit 4 – Personal and Professional Development on the HND in Health and Social Care, to record the assessment as not being completed.	B4.2.a B4.2.b	LoE3
Q9 finding 1	In relation to the supporting all students to achieve successful academic and professional outcomes, QAA finds that there is a lack of concrete and timely action on attendance rates.	B2.2.a.ii	LoE2
Q9 finding 1	As above	B4.2.b	LoE3

Q9 finding 2	There is a lack of concrete and timely action on facilitation of the completion of courses within the expected timeframes, especially in relation to the HND in Health and Social Care, where failure to complete appropriate work experience means that students are not able to qualify for their award.	B2.2.a.ii	LoE2
Q9 finding 2	As above	B4.2.a B4.2.b	LoE3
Q9 finding 3	The college's inability to produce definitive student data and evidence-based plans for ensuring that all students are supported to achieve successful academic and professional outcomes.	B2.2.a.ii	LoE2
Q9 finding 3	As above	B2.2.a.ii	LoE2
Q9 finding 4	The team questioned the ability of the data the college collects to effectively monitor student retention and achievement with a view to supporting all students to achieve successful academic and professional outcomes and to put in place robust plans to mitigate risks to students being unable to complete.	B4.2.a B4.2.c	LoE3

Annex B: Ongoing conditions of registration

Condition B1: Academic experience

Scope

B1.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a Provider (including, but not limited to, circumstances where a Provider is responsible only for granting awards for students registered with another Provider).

Requirement

B1.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B1.1, the Provider must ensure that the students registered on each **higher education course** receive a high quality academic experience.

B1.3 For the purposes of this condition, a high quality academic experience includes but is not limited to ensuring all of the following:

- each higher education course is up to date;
- each higher education course provides educational challenge;
- each higher education course is coherent;
- each higher education course is effectively delivered; and
- each higher education course, as appropriate to the subject matter of the course,
- requires students to develop relevant skills.

B1.4 Insofar as **relevant skills** includes technical proficiency in the English language, the Provider is not required to comply with B1.3.e to the extent that it is able to demonstrate to the OfS, on the balance of probabilities, that its English language proficiency requirements, or failure to have English language proficiency requirements, for one or more students, are strictly necessary as a matter of law because compliance with B1.3.e in respect of that student, or those students:

- i. would amount to a form of discrimination for the purposes of the Equality Act 2010; and
- ii. cannot be objectively justified for the purposes of relevant provisions of that Act; and
- iii. does not fall within an exception or exclusion provided for under or by virtue of that Act, including but not limited to provisions of the Act that relate to competence standards.

Definitions

B1.5 For the purposes of this condition B1:

- a. 'appropriately informed' will be assessed by reference to:
 - i. the time period within which any of the developments described in the definition of **up to date** have been in existence;

- ii. the importance of any of the developments described in the definition of **up to date** to the subject matter of the **higher education course**; and
- iii. the time period by which it is planned that such developments described in the
- iv. definition of up to date will be brought into the higher education course content.
- b. 'coherent' means a higher education course which ensures:
 - i. there is an appropriate balance between breadth and depth of content;
 - ii. subjects and skills are taught in an appropriate order and, where necessary, build on each other throughout the course; and
 - iii. key concepts are introduced at the appropriate point in the course content.
- c. 'educational challenge' means a challenge that is no less than the minimum level of rigour and difficulty reasonably expected of the higher education course, in the context of the subject matter and level of the course.
- d. 'effectively delivered', in relation to a higher education course, means the manner in which it is taught, supervised and assessed (both in person and remotely) including, but not limited to, ensuring:
 - i. an appropriate balance between delivery methods, for example lectures, seminars,
 - ii. group work or practical study, as relevant to the content of the course; and
 - iii. an appropriate balance between directed and independent study or research, as
 - iv. relevant to the level of the course.
- e. 'higher education course' is to be interpreted:
 - i. in accordance with the Higher Education and Research Act 2017; and
 - ii. so as to include, for the avoidance of doubt:
 - A. a course of study;
 - B. a programme of research;
 - C. any further education course that forms an integrated part of a higher education course; and
 - D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.
- f. 'relevant skills' means:
 - i. knowledge and understanding relevant to the subject matter and level of the **higher** education course; and
 - ii. other skills relevant to the subject matter and level of the **higher education course** including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences.
- g. '**up to date**' means representative of current thinking and practices in the subject matter to which the **higher education course** relates, including being **appropriately informed** by recent:
 - i. subject matter developments;

- ii. research, industrial and professional developments; and
- iii. developments in teaching and learning, including learning resources.

Condition B2: Resources, support and student engagement

Scope

B2.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a Provider (including, but not limited to, circumstances where a Provider is responsible only for granting awards for students registered with another Provider).

Requirement

B2.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B2.1, the Provider must take all reasonable steps to ensure:

- a. each **cohort of students** registered on each **higher education course** receives **resources** and **support** which are sufficient for the purpose of ensuring:
 - i. a high quality academic experience for those students; and
 - ii. those students succeed in and beyond higher education; and
- b. effective **engagement** with each **cohort of students** which is sufficient for the purpose of ensuring:
 - i. a high quality academic experience for those students; and
 - ii. those students succeed in and beyond higher education.

B2.3 For the purposes of this condition, 'all reasonable steps' is to be interpreted in a manner which (without prejudice to other relevant considerations):

- a. focuses and places significant weight on:
 - i. the particular academic needs of each **cohort of students** based on prior academic attainment and capability; and
 - ii. the principle that the greater the academic needs of the **cohort of students**, the number and nature of the steps needed to be taken are likely to be more significant;
- b. places less weight, as compared to the factor described in B2.3a., on the Provider's financial constraints; and
- c. disregards case law relating to the interpretation of contractual obligations.

Definitions

B2.4 For the purposes of this condition B2:

- a. 'academic misconduct' means any action or attempted action that may result in a student obtaining an unfair academic advantage in relation to an assessment, including but not limited to plagiarism, unauthorised collaboration and the possession of unauthorised materials during an assessment.
- b. 'appropriately qualified' means staff have and maintain:
 - i. expert knowledge of the subject they design and/or deliver;

- ii. teaching qualifications or training, and teaching experience, appropriate for the content and level of the relevant **higher education course**; and
- iii. the required knowledge and skills as to the effective delivery of their **higher** education course.
- c. **'assessment**' means any component of a course used to assess student achievement towards a **relevant award**, including an examination and a test.
- d. 'cohort of students' means the group of students registered on to the higher education course in question and is to be interpreted by reference to the particular academic needs of those students based on prior academic attainment and capability.
- e. '**engagement**' means routine provision of opportunities for students to contribute to the development of their academic experience and their **higher education course**, in a way that maintains the academic rigour of that course, including, but not limited to, through membership of the Provider's committees, opportunities to provide survey responses, and participation in activities to develop the course and the way it is delivered.
- f. 'higher education course' is to be interpreted:
 - i. in accordance with the Higher Education and Research Act 2017; and
 - ii. so as to include, for the avoidance of doubt:
 - A. a course of study;
 - B. a programme of research;
 - C. any further education course that forms an integrated part of a higher education course; and
 - D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.
- g. **'physical and digital learning resources**' includes, as appropriate to the content and delivery of the **higher education course**, but is not limited to:
 - i. physical locations, for example teaching rooms, libraries, studios and laboratories;
 - ii. physical and digital learning resources, for example books, computers and software;
 - iii. the resources needed for digital learning and teaching, for example, hardware and software, and technical infrastructure; and
 - iv. other specialist resources, for example specialist equipment, software and research tools.
- h. 'relevant award' means:
 - i. a research award;
 - ii. a taught award; and/or
 - iii. any other type of award or qualification in respect of a higher education course, including an award of credit granted in respect of a module that may form part of a larger higher education course, whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.

- i. '**research award**' and '**taught award**' have the meanings given in section 42(3) of the Higher Education and Research Act 2017.
- j. 'resources' includes but is not limited to:
 - i. the staff team that designs and delivers a **higher education course** being collectively **sufficient in number**, **appropriately qualified** and deployed effectively to deliver in practice; and
 - ii. **physical and digital learning resources** that are adequate and deployed effectively to meet the needs of the **cohort of students**.
- k. 'sufficient in number' will be assessed by reference to the principle that the larger the cohort size of students, the greater the number of staff and amount of staff time should be available to students, and means, in the context of the staff team:
 - i. there is sufficient financial resource to recruit and retain sufficient staff;
 - ii. the Provider allocates appropriate financial resource to ensuring staff are equipped to teach courses;
 - iii. **higher education courses** have an adequate number of staff, and amount of staff time; and
 - iv. the impact on students of changes in staffing is minimal.
- I. **'support**' means the effective deployment of assistance, as appropriate to the content of the **higher education course** and the **cohort of students**, including but not limited to:
 - i. academic support relating to the content of the higher education course;
 - ii. support needed to underpin successful physical and digital learning and teaching;
 - iii. support relating to understanding, avoiding and reporting academic misconduct;

and

iv. careers support, but for the avoidance of doubt, does not include other categories of non-academic support.

Condition B4: Assessment and awards

Scope

B4.1 This condition applies to the quality of higher education provided in any manner or form by, or on behalf of, a Provider (including, but not limited to, circumstances where a Provider is responsible only for granting awards for students registered with another Provider).

Requirement

B4.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B4.1, the Provider must ensure that:

- a. students are assessed effectively;
- b. each assessment is valid and reliable;
- c. academic regulations are designed to ensure that relevant awards are credible;

- d. subject to paragraph B4.3, in respect of each **higher education course**, **academic regulations** are designed to ensure the effective assessment of technical proficiency in the English language in a manner which appropriately reflects the level and content of the applicable **higher education course**; and
- e. **relevant awards** granted to students are **credible** at the point of being granted and when compared to those granted previously.

B4.3 The Provider is not required to comply with B4.2d to the extent that:

- a. a higher education course is assessing a language that is not English; or
- b. the Provider is able to demonstrate to the OfS, on the balance of probabilities, that its **academic regulations**, or failure to have any **academic regulations**, for assessing technical proficiency in the English language for one or more students are strictly necessary as a matter of law because compliance with B4.2d in respect of that student, or those students:
 - i. would amount to a form of discrimination for the purposes of the Equality Act 2010; and
 - ii. cannot be objectively justified for the purposes of relevant provisions of that Act; and
 - iii. does not fall within an exception or exclusion provided for under or by virtue of that Act, including but not limited to provisions of the Act that relate to competence standards.

Definitions

B4.4 For the purposes of this condition B4:

- a. 'academic misconduct' means any action or attempted action that may result in a student obtaining an unfair academic advantage in relation to an **assessment**, including but not limited to plagiarism, unauthorised collaboration and the possession of unauthorised materials during an **assessment**.
- b. 'academic regulations' means regulations adopted by the Provider, which govern its higher education courses, including but not limited to:
 - i. the assessment of students' work;
 - ii. student discipline relating to academic matters;
 - iii. the requirements for relevant awards; and
 - iv. the method used to determine classifications, including but not limited to:
 - A. the requirements for an award; and
 - B. the algorithms used to calculate the classification of awards.
- c. 'assessed effectively' means assessed in a challenging and appropriately comprehensive way, by reference to the subject matter of the higher education course, and includes but is not limited to:
 - i. providing stretch and rigour consistent with the level of the course;
 - ii. testing relevant skills; and

- iii. **assessments** being designed in a way that minimises the opportunities for **academic misconduct** and facilitates the detection of such misconduct where it does occur.
- d. **'assessment**' means any component of a course used to assess student achievement towards a **relevant award**, including an examination and a test.
- e. '**credible**' means that, in the reasonable opinion of the OfS, **relevant awards** reflect students' knowledge and skills, and for this purpose the OfS may take into account factors which include, but are not limited to:
 - i. the number of **relevant awards** granted, and the classifications attached to them, and the way in which this number and/or the classifications change over time and compare with other Providers;
 - ii. whether students are **assessed effectively** and whether **assessments** are **valid** and **reliable**;
 - iii. any actions the Provider has taken that would result in an increased number of relevant awards, and/or changes in the classifications attached to them, whether or not the achievement of students has increased, for example, changes to assessment practices or academic regulations; and
 - iv. the Provider's explanation and evidence in support of the reasons for any changes in the classifications over time or differences with other Providers.
- f. 'higher education course' is to be interpreted:
 - i. in accordance with the Higher Education and Research Act 2017; and
 - ii. so as to include, for the avoidance of doubt:
 - A. a course of study;
 - B. a programme of research;
 - C. any further education course that forms an integrated part of a higher education course; and
 - D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.

g. 'relevant award' means:

- i. a research award;
- ii. a taught award; and/or
- iii. any other type of award or qualification in respect of a higher education course, including an award of credit granted in respect of a module that may form part of a larger higher education course, whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.
- h. 'relevant skills' means:
 - i. knowledge and understanding relevant to the subject matter and level of the **higher** education course; and

- ii. other skills relevant to the subject matter and level of the **higher education course** including, but not limited to, cognitive skills, practical skills, transferable skills and professional competences.
- i. '**reliable**' means that an **assessment**, in practice, requires students to demonstrate knowledge and skills in a manner which is consistent as between the students registered on a **higher education course** and over time, as appropriate in the context of developments in the content and delivery of the **higher education course**.
- j. **'research award**' and **'taught award**' have the meanings given in section 42(3) of the Higher Education and Research Act 2017.
- k. **'valid**' means that an **assessment** in fact takes place in a way that results in students demonstrating knowledge and skills in the way intended by design of the assessment.

Condition B5: Sector-recognised standards

Scope

B5.1 This condition relates to the standards applied to higher education provided in any manner or form by, or on behalf of, a provider (including, but not limited to, circumstances where a provider is responsible only for granting awards for students registered with another provider).

Requirement

B5.2 Without prejudice to the principles and requirements provided for by any other condition of registration and the scope of B5.1, the provider must ensure that, in respect of any **relevant awards** granted to students who complete a higher education course provided by, or on behalf of, the provider (whether or not the provider is the awarding body):

- a. any standards set appropriately reflect any applicable **sector-recognised standards**; and
- b. awards are only granted to students whose knowledge and skills appropriately reflect any applicable **sector-recognised standards**.

Definitions

B5.3 For the purposes of this condition B5:

- a. 'higher education course' is to be interpreted:
 - i. in accordance with the Higher Education and Research Act 2017; and
 - ii. so as to include, for the avoidance of doubt:
 - A. a course of study;
 - B. a programme of research;
 - C. any further education course that forms an integrated part of a higher education course; and
 - D. any module that forms part of a higher education course, whether or not that module is delivered as an integrated part of the course.
- b. 'relevant award' means:

- i. a **research award**;
- ii. a taught award; and/or
- iii. any other type of award or qualification in respect of a **higher education course**, including an award of credit granted in respect of a module that may form part of a larger **higher education course**,

whether or not granted pursuant to an authorisation given by or under the Higher Education and Research Act 2017, another Act of Parliament or Royal Charter.

- c. '**research award**' and '**taught award**' have the meanings given in section 42(3) of the Higher Education and Research Act 2017.
- d. '**sector-recognised standards**' means the standards contained in the document of that title published by the OfS from time to time.



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