



# **Integrated quality and enhancement review**

**Summative review**

**Stoke on Trent College**

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## **Preface**

The mission of the Quality Assurance Agency for Higher Education (QAA) is to safeguard the public interest in sound standards of higher education qualifications and to inform and encourage continual improvement in the management of the quality of higher education. As part of this mission, QAA undertakes reviews of higher education provision delivered in further education colleges. This process is known as Integrated quality and enhancement review (IQER).

## **Purpose of IQER**

Higher education programmes delivered by further education colleges (colleges) lead to awards made by higher education institutions or Edexcel. The awarding bodies retain ultimate responsibility for maintaining the academic standards of their awards and assuring the quality of the students' learning opportunities. The purpose of IQER is, therefore, to safeguard the public interest in the academic standards and quality of higher education delivered in colleges. It achieves this by providing objective and independent information about the way in which colleges discharge their responsibilities within the context of their partnership agreements with awarding bodies. IQER focuses on three core themes: academic standards, quality of learning opportunities and public information.

## **The IQER process**

IQER is a peer review process. It is divided into two complementary stages: Developmental engagement and Summative review. In accordance with the published method, colleges with less than 100 full-time equivalent students funded by the Higher Education Funding Council for England (HEFCE) may elect not to take part in Developmental engagements, but all HEFCE-funded colleges will take part in Summative review.

## **Developmental engagement**

Developmental engagements explore in an open and collegial way the challenges colleges face in specific areas of higher education provision. Each college's first, and often their only, Developmental engagement focuses on student assessment.

The main elements of a Developmental engagement are:

- a self-evaluation by the college
- an optional written submission by the student body
- a preparatory meeting between the college and the IQER coordinator several weeks before the Developmental engagement visit
- the Developmental engagement visit, which normally lasts two days
- the evaluation of the extent to which the college manages effectively its responsibilities for the delivery of academic standards and the quality of its higher education provision, plus the arrangements for assuring the accuracy and completeness of public information it is responsible for publishing about its higher education
- the production of a written report of the team's findings.

To promote a collegial approach, Developmental engagement teams include up to two members of staff from the further education college under review. They are known as nominees for this process.

## Summative review

Summative review addresses all aspects of a college's HEFCE-funded higher education provision and provides judgements on the management and delivery of this provision against core themes one and two, and a conclusion against core theme three.

Summative review shares the main elements of Developmental engagement described above. Summative review teams however, are composed of the IQER coordinator and QAA reviewers. They do not include nominees.

## Evidence

In order to obtain evidence for the review, IQER teams carry out a number of activities, including:

- reviewing the college's self-evaluation and its internal procedures and documents
- reviewing the optional written submission from students
- asking questions of relevant staff
- talking to students about their experiences.

IQER teams' expectations of colleges are guided by a nationally agreed set of reference points, known as the Academic Infrastructure. These are published by QAA and consist of:

- *The framework for higher education qualifications in England, Wales and Northern Ireland*, which includes descriptions of different higher education qualifications
- *the Code of practice for the assurance of academic quality and standards in higher education*
- subject benchmark statements, which describe the characteristics of degrees in different subjects
- guidelines for preparing programme specifications, which are descriptions of what is on offer to students in individual programmes of study
- award benchmark statements which describe the generic characteristics of an award, for example Foundation Degrees.

In addition, Developmental engagement teams gather evidence by focusing on particular aspects of the theme under review. These are known as 'lines of enquiry'.

## Outcomes of IQER

Each Developmental engagement and Summative review results in a written report:

- Developmental engagement reports set out good practice and recommendations and implications for the college and its awarding bodies, but do not contain judgements. Recommendations will be at one of three levels - **essential**, **advisable** and **desirable**. To promote an open and collegial approach to Developmental engagements, the reports are not published.
- Summative review reports identify good practice and contain judgements about whether the college is discharging its responsibilities effectively against core themes one and two above. The judgements are **confidence**, **limited confidence** or **no confidence**. There is no judgement for the third core theme, instead the report will provide evaluation and a conclusion. Summative review reports are published. Differentiated judgements can be made where a team judges a college's

management of the standards and/or quality of the awards made by one awarding body to be different from those made by another.

Colleges are required to develop an action plan to address any recommendations arising from IQER. Progress against these action plans is monitored by QAA in conjunction with HEFCE and/or the college's awarding body(ies) as appropriate. The college's action plan in response to the conclusions of the Summative review will be published as part of the report.

## Executive summary

### The Summative review of Stoke on Trent College carried out in March 2011

As a result of its investigations, the Summative review team (the team) considers that there can be **confidence** in the College's management of its responsibilities, as set out in its partnership agreement, for the standards of the awards it offers on behalf of its awarding body. The team also considers that there can be **confidence** in the College's management of its responsibilities, as set out in its partnership agreement, for the quality of learning opportunities it offers. The team considers that reliance **can** be placed on the accuracy and completeness of the information that the College is responsible for publishing about itself and the programmes it delivers.

### Good practice

The team has identified the following good practice for dissemination:

- the use of the College's virtual learning environment to conduct online evaluation of a Diploma in Teaching in the Lifelong Learning Sector module leads to enhancements to current as well as future provision. It is also effective both in supporting teaching and active learning and as a stimulus for student-led course enhancement
- initial teacher training and information technology students receive individualised support through an effective online tutorial and discussion forum which is operated flexibly
- the College's commitment to, and management of, its learning resource and support services effectively underpins student learning and achievement
- the content of the mentor handbook for the FdA Education (teaching assistants) is concise and focused specifically on supporting students effectively in the workplace.

### Recommendations

The team has also identified a number of recommendations for the enhancement of the higher education provision.

The team considers that it would be **advisable** for the College to:

- design a more effective process for capturing necessary data, including from external examiner reports, to inform annual review, quality improvement planning and the transparent follow up and evaluation of consequent actions
- ensure that revised assessment procedures are embedded and applied consistently across all courses
- embed the consistent use and referencing of the Academic Infrastructure to ensure its effective application to teaching, learning and assessment.

The team considers that it would be **desirable** for the College to:

- adopt a process of double-marking, building on the good practice in the Diploma in Teaching in the Lifelong Learning Sector provision, to ensure consistency and accuracy of assessment
- devise and implement improved strategies for engagement with students and

- employers in the review and evaluation of all aspects of its provision
- develop its internal verification processes to facilitate the audit and assurance of the quality of feedback given to students on their formally assessed work
- develop and apply consistent nomenclature to handbooks produced for students and increase their consistency in terms of layout and content
- continue to develop the higher education aspects of its website
- continue to develop and apply detailed procedures to underpin the College's external and internal communications policies in order to effectively embed these in publications
- adopt a minimum expectation regarding key course information to be made available on the virtual learning environment and devise and implement checking procedures to ensure this.

## A Introduction and context

1 This report presents the findings of the Summative review of higher education funded by the Higher Education Funding Council for England (HEFCE) conducted at Stoke on Trent College. The purpose of the review is to provide public information about how the College discharges its responsibilities for the management and delivery of academic standards and the quality of learning opportunities available to students. The review applies to programmes which the College delivers on behalf of the University of Staffordshire. The review was carried out by Mr David Fallows, Professor Keith Johnson and Mr Clive Turner (reviewers) and Mrs Mandy Hobart (coordinator).

2 The Summative review team (the team) conducted the review in agreement with the College and in accordance with *The handbook for Integrated Quality and Enhancement Review* (the handbook), published by QAA. Evidence in support of the Summative review included the Higher Education Strategy document, annual monitoring reports and action plans, College policy documents, minutes of meetings, partnership agreements and meetings with staff and students. In particular, the team drew on the findings and recommendations of the Developmental engagement in assessment. A summary of findings from this Developmental engagement is provided in section C of this report. The review also considered the College's use of the Academic Infrastructure, developed by QAA on behalf of higher education providers, with reference to the *Code of practice for the assurance of academic quality and standards in higher education (Code of practice)*, subject and award benchmark statements, *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ) and programme specifications.

3 In order to assist HEFCE to gain information to assist with the assessment of the impact of Foundation Degree (FD) awards, section D of this report summarises details of the FD programmes delivered at the College.

4 Stoke on Trent is a large general further education college located on two main campuses at Shelton and Burslem and two neighbourhood Colleges at Longton and Tunstall. The College's mission is 'delivering excellence in learning and skills' and to be the focus of vocational provision spanning all sector areas. The College holds the Training and Quality Standard for excellence in Adult Social Care, Building Services Engineering, Construction, Freight Logistics and Warehousing, Health Care and Passenger Transport. The College has delivered higher education provision for 20 years, with the current offer focusing mostly on Foundation Degrees.

5 The higher education provision is offered through a formal partnership with Staffordshire University Regional Federation (SURF) which includes nine colleges across Staffordshire and Shropshire. The Stoke on Trent area is officially described as deprived with only a small percentage of the population holding higher education qualifications. The College has 14,509 student enrolments in the current academic year, of whom 530 are on higher education programmes. Most provision is part-time, with only 22 students studying on a full-time basis. The provision is spread across the two main campuses, with 124 students attending off-site provision at British Telecom's Yarnfield site. Due to the close proximity to the main University campus, students have access to the University's facilities. The College has developed blended learning to be delivered on the employer's premises.

## Partnership agreement with the awarding body

6 The higher education programmes validated by the awarding body and funded by HEFCE, together with the full-time equivalent student numbers in brackets, are as follows:

### Staffordshire University

- FdA for the Creative and Cultural Industries: Digital Media Production (15)
- FdA Complementary Therapies (10.5)
- FdSc Computing (14.5)
- Foundation Year in Computing and Business Technology (12)
- FdSc Construction (Architectural Design) (5)
- FdSc Construction (Quantity Surveying) (4.5)
- FdA Customer Service and Contact Centre Management (12.5)
- FdA Early Childhood Studies (47)
- FdA Education (Teaching Assistants) (29.5)
- FdSc Electrical and Electronic Technology (8.5)
- FdSc Information Technology for Business (16)
- FdSc Information and Communication Technology (26.5)
- FdA Leadership and Management (3.5)
- FdSc Mechanical Technology (11)
- FdA Social Care (3.5)
- HND Applied Information Technology (2.5)
- HNC Computing Science - Individual Units (8.5)
- Diploma in Teaching in the Lifelong Learning Sector (41).

7 The College's Higher Education provision is operated via a formal partnership with Staffordshire University through SURF. The partnership agreement with the University requires that programmes are subject to its quality assurance procedures. Link tutors are appointed by the University to work with course teams and to ensure effective management of quality assurance and academic standards.

## Recent developments in higher education at the College

8 The College has recently undergone a reorganisation and has reviewed the allocation of responsibilities for higher education, with a new Higher Education Coordinator role being incorporated into the responsibilities of the Assistant Director: Access and Trade Union Studies. The College is keen to have a more coherent approach to higher education and to develop its range of provision, and is also seeking to develop further links with the University of Keele and with Wolverhampton University.

## Students' contribution to the review, including the written submission

9 Students on higher education programmes at the College were invited to present a submission to the Summative review team. As the majority are part-time, the production of the written submission was supported by the Safeguarding and Learner Voice Coordinator. The submission was based on statistical information collected through an online survey administered by an education technologist. Further information collected at focus group meetings, including feedback from part-time blended learning students based at Yarnfield, was edited by two students. In total 149 students responded to the survey and 40 students from a range of programmes took part in focus groups. In total this represents around one

third of higher education enrolments and offers a representative commentary. The team found the student submission helpful and explored its content in meetings with students to gain a clear picture of their learning experience.

## **B Evaluation of the management of HEFCE-funded higher education**

### **Core theme 1: Academic standards**

#### **How are responsibilities for managing and delivering higher education standards delegated within the management structure and what reporting arrangements are in place?**

10 Under the terms of the SURF Agreement the University takes responsibility for the standards and quality of its awards. However, the College has direct responsibility for the quality of the learning opportunities of its higher education programmes, for the achievement of standards, and for ensuring any weaknesses in the provision are addressed. In practice, the University sets the standards of the programmes and assessments at validation and maintains them through the monitoring of student achievement at its award boards. Its standardisation and approval of assessments and the external examination processes also support this maintenance.

11 Since the Developmental engagement, the College has undergone a major restructuring which has had a direct impact on the arrangements for management and oversight of the higher education provision. The College's management of the provision accurately reflects the requirements of its partnership agreement with the University. Higher education programmes are managed by course team leaders reporting to assistant directors. Assistant directors work within directorates of related curriculum areas managed by directors, who are responsible for all provision, higher and further education, within their curriculum areas. The Executive Director of Learning and Standards takes responsibility at senior management level for all provision, with the exception of teacher education, where responsibility lies with the Executive Director of Human and Physical resources. The College delegates operational responsibility for adherence to standards to delivery teams and course team leaders.

12 The College takes an institution-wide approach to the management of its responsibilities for academic standards, quality assurance and enhancement, irrespective of level. Each course team leader prepares a course review annually which contributes to the self-assessment review of the College directorate. These reports in turn contribute to the College's Self Assessment Report approved by senior management and governors. Course reviews are informed by student achievement and success rates, module results, external examiner and University link tutor reports and feedback from students. In addition to College reviews, the University requires course team leaders to prepare an annual monitoring Report, to include responses to external examiner reports and data and evidence from standardisation meetings. Reports are reviewed by the appropriate University faculty quality committee. The reviews and annual monitoring reports input into a College directorate quality improvement plan that is monitored at three-monthly intervals through team meetings. These plans cover both higher and further education provision, and contribute to the annual higher education quality improvement plan monitored by the Quality Directorate. In addition, assistant directors meet weekly with the Executive Director, Learning and Standards, to consider the progress of quality improvement plans and other whole-college issues, to assure that standards are maintained.

13 The College has a number of administrative staff with responsibilities for the higher education provision and who support effective communications and relationships with University staff in related roles. The College staff confirmed that University link tutors act as an effective conduit between the College and the University, ensuring standards requirements are complied with and providing additional information to support student progression opportunities.

### **What account is taken of the Academic Infrastructure?**

14 Comprehensive processes and procedures conducted by the University and complied with by the College ensure that most elements of the Academic Infrastructure are embedded within the provision. Assessments are approved by the University and student work is moderated to ensure it is at the correct level. Following a recommendation from the Developmental engagement for the need to increase understanding and utilisation of the Academic Infrastructure, the College with the support of the University, has taken steps to enhance the understanding of staff through mandated staff development activity and the employment of tighter assessment procedures. The review team found that staff have an increased awareness of the relevant aspects of subject benchmark statements, the *Foundation Degree qualification benchmark*, the FHEQ and the sections of the *Code of practice* relevant to academic standards. The team also noted that the developing virtual learning environment has the potential to provide staff with valuable guidance.

### **How does the College assure itself that it is fulfilling its obligations to ensure that the standards of higher education provision meet the requirements of validating partners and awarding bodies?**

15 As indicated in paragraph 11, the College's responsibility for academic standards is largely in relation to operational course delivery. Minor modifications to modules, programmes and assessments are approved by the University and, for most programmes, negotiated through consortium meetings. University link tutors have a central role in these negotiations. All programmes are subject to University quinquennial revalidation. Award boards held at the University are attended by course team leaders and assistant directors. Module results are collated across the consortium by the University. College staff have access to consortium achievement information, allowing staff to monitor their provision and achievement against that of the consortium. Course teams utilise analysis of data and external reports to inform annual monitoring reports and quality improvement plans, so ensuring standards are considered at course team and college level. The team found that the recent changes in College systems have the potential to employ the available data with positive effect to enhance programme management and standards across the College. As a result of concerns that external examiners were not commenting on individual college standards, the University has recently made such comments an expectation for external examiners.

16 College course team leaders produce annual monitoring reports which are sent to the University and are reviewed by senior management within the College. University link tutors have a central role in assisting course teams in developing and monitoring actions from these reviews. The College also facilitates meetings between students and link tutors at least once each year, satisfying the University requirement for primary feedback from students. However, the team identified that issues raised by external examiners and by link tutors are not always responded to in self-assessment reviews and quality improvement plans. For example, an issue raised by a consortium external examiner concerning the level of critical analysis and standard of report writing has not been included in action plans. This has resulted in a lack of transparency in the tracking, recording and monitoring of enhancements to ensure that students, employers and external examiners can be satisfied

that feedback has been responded to. The team considers that it is advisable for the College to design a more effective process for capturing necessary data, including from external examiner reports, to inform annual reviews, quality improvement planning and the transparent follow up and evaluation of consequent actions.

17 The recommendations from the Developmental engagement related to academic standards and raising awareness of the Academic Infrastructure have been referred to in paragraph 14. The team is satisfied that the procedures for monitoring the completion of assessment documentation have been suitably strengthened and now comply with the requirements of the partnership agreement.

### **What are the College's arrangements for staff development to support the achievement of appropriate academic standards?**

18 All staff teaching on University programmes are required to be approved at validation or through a University faculty quality committee. Staff who have not previously taught on higher education programmes are provided with mentor support, and their assessment activity carefully moderated through the College's internal verification process. In addition, the College has developed a cross-college approach to staff development for higher education tutors which promotes consistency and provides opportunities for building on effective practice. Needs are identified by the Higher Education Implementation Group, informed by annual self-assessments, teaching observations, appraisals and monitoring review standardisation meetings, and included in the College's staff development priorities. Activities are evaluated by the Higher Education Implementation Group and reported to the Higher Education Strategy Group, with outcomes also discussed at course team meetings, supporting ongoing improvements.

19 Staff development priorities are determined at directorate level principally through the clear directorate self-evaluation processes. Individual staff development needs are also identified through the College's appraisal process. All teaching staff are expected to be members of the Institute for Learning and undertake 30 hours of relevant developmental activity. In practice College staff undertake a minimum of 10 days of staff development activity each year, which includes time for University-based staff development sessions and subject-related updating. A number of staff have taken up opportunities for industry and/or professional updating and postgraduate qualifications. The team noted that master's-level research undertaken by staff in the Diploma in Teaching in the Lifelong Learning Sector and in Information Technology for Business courses has enhanced the development and evaluation of interactive websites to provide individual student support.

**The team concludes that it has confidence in the College's management of its responsibilities, as set out in its partnership agreement, for the management and delivery of the standards of the awards it offers on behalf of its awarding body.**

## **Core theme 2: Quality of learning opportunities**

### **How are responsibilities for managing the quality of learning opportunities for higher education programmes delegated within the management structure and what reporting arrangements are in place?**

20 The College has appointed a Director of Quality responsible for the quality of higher education across the College, and a Higher Education Coordinator who works with course teams to support quality and enhancements. At course level assistant directors manage

quality and associated reporting requirements. The College has clearly articulated responsibilities for the operational and quality management processes for higher education which are reflected in job descriptions and remits at course and management level. The new management team, whose responsibilities and reporting lines are set out in paragraphs 10 and 11, ensures that staff are clear about how actions and quality are monitored and reported, and how progress against targets is reviewed to meet the requirements of the University. The Higher Education Strategy Group and the Higher Education Implementation Group, on which curriculum managers and academic staff are represented, provides an effective mechanism for ensuring quality and monitoring arrangements.

21 Staff respond to external examiner reports through action plans linked to annual monitoring reports, providing clear identification of quality issues and actions. These reports are reviewed by the Higher Education Implementation and Strategy Groups and inform the College Quality Improvement Plan, which is reviewed by senior management. Reports are also reviewed by link tutors and inform the University Quality Committees at faculty level, as well as being discussed at Boards of Study attended by course leaders as required by the partnership agreement. While the development of new processes and procedures including the Assessment Policy represents significant progress, the College is only just beginning to assess the impact and evaluate the effectiveness of these new arrangements.

**How does the College assure itself that it is fulfilling its obligations to its awarding body to ensure that students receive appropriate learning opportunities?**

22 The College has taken forward recommendations from the Developmental engagement report to address the improvement of administration of assessment by putting in place a new assessment policy and associated procedure. The new process provides clarity about how the College is managing its obligations for maintaining appropriate learning opportunities. The effectiveness of the new procedures is discussed at the Higher Education Implementation Group and progress monitored. The team also noted that revised examination procedures designed to ensure the security of tests, as required by the partnership agreement, have been put in place.

23 The team found that, while a number of assessment issues have been addressed by enhanced procedures and monitoring, including, for example, the recommendation that modules should have no more than two formal assessments, some have not. New procedures are embedded and identifiable in a number of courses, including the Diploma in Teaching in the Lifelong Learning Sector, FdA Early Childhood Studies and FdA for the Creative and Cultural Industries: Digital Media Production, but are less well established in others. The team considers it advisable that the College ensure that revised assessment procedures are embedded and being applied consistently across all higher education provision. This would ensure that new policies and procedures inform the evaluation of assessment practices to assure quality and consistency.

24 The effective practice in the training of mentors developed to support students on the Diploma in Teaching in the Lifelong Learning Sector would be of value for other courses including the work-based learning modules of Foundation Degrees. The course team undertakes the double-marking of assessments before they are sent to the University for moderation and second-marking. All course team members participate in standardisation meetings within the SURF consortium to further ensure the quality of assessment decisions. The team considers it desirable for the College to adopt a college-wide process of double-marking, building on the good practice of the Diploma in Teaching in the Lifelong Learning Sector, to ensure consistency and accuracy of assessment.

### **What account is taken of the Academic Infrastructure?**

25 All courses and assessments are validated and approved by the University and clearly reference the subject benchmark statements, the *Foundation Degree qualification benchmark*, the *Code of practice* and the FHEQ. As outlined in paragraph 14, staff have received training to raise awareness and understanding of the Academic Infrastructure. Staff feedback has indicated a high level of satisfaction with the training received. The team found, however, that there is still a lack of embedding of all aspects of the Academic Infrastructure, particularly in relation to assessment and the precepts of the *Code of practice, Section 6: Assessment of students*. While the quality assurance audit documents present clear evidence of an effective internal audit of quality management, they contain no explicit references to the Academic Infrastructure. The team considers it advisable that the College continue to embed the consistent use and referencing of the Academic Infrastructure to ensure its effective application to teaching, learning and assessment.

### **How does the College assure itself that the quality of teaching and learning is being maintained and enhanced?**

26 There are various strategies used by the College to monitor the quality of teaching and learning opportunities. These include a system of universal classroom observations using the Ofsted Common Inspection Framework criteria. Data from teaching observations is monitored by the Director of Quality. The team found the system to be comprehensive and thorough, but not reflective of all aspects of higher education learning. The College may wish to further develop the system to include requirements for higher education teaching.

27 The College uses data from the National Student Survey, meetings with link tutors, and from student module surveys to monitor the quality of the student learning experience. Information is also provided by the University at meetings with link tutors. The College analyses recruitment, retention and achievement data to inform annual monitoring reports and the Quality Assurance Plans and to assure learning is well supported. The College also seeks to work with employers to ensure that learning supports workplace needs and progression. Consultation with the British Telecom Apprenticeship team is effective in ensuring the quality of provision in the FDs in Information Technology for Business and Information and Communication Technology. In these programmes and in the Diploma in Teaching in the Lifelong Learning Sector the College has developed effective online systems and materials which have enhanced the quality of students' learning experience. The team noted the close and effective partnership with the commissioning employer on the FdSc Information Technology for Business and the use of live briefs on the FdA Digital Media Production.

28 The College's virtual learning environment and web-based support systems for courses in teacher education and information technology for business include clear evidence of employer and student involvement in their design. The online systems are well received by students. Staff are able to answer students' questions and provide additional support as required. The team identified good practice in the use of the virtual learning environment to conduct online evaluation of a Diploma in Teaching in the Lifelong Learning Sector module, leading to enhancements to current as well as future provision. It is effective both in supporting teaching and active learning and as a stimulus for student-led course enhancement.

### **How does the College assure itself that students are supported effectively?**

29 The College monitors externally and internally generated data to evaluate its provision and responsibilities in providing student support. The sufficiency of support and

resources is monitored by the Higher Education Implementation Group and, through reports received, by the Higher Education Strategy Group. Students' views are gathered through module evaluations and through meetings with tutors and link tutors and included in course reviews to ensure improvements can be identified. Students are provided with course and module handbooks and a College handbook, which provide details of the support available, both at the College and through the University.

30 The College has a network of employers with whom it engages in different ways to support various aspects of programme design, development and delivery. Course teams meet with employers, including those involved with the FdA Early Childhood Studies and the FDs in Information Technology for Business and Information and Communication Technology, to review course developments and support requirements. However, while there is effective practice in childhood studies and information technology courses, and informal employer relations are good in other subject areas, the College has no routine process for gathering the views of employers to inform course reviews and resulting action plans. Similarly, while the team found evidence of student evaluations at module level and some engagement in programme committees, there is limited evidence that students are provided with feedback concerning their contributions or of structured student engagement in the review of programmes. The team considers it desirable that the College devise and implement improved strategies for engagement with students and employers in the review and evaluation of all aspects of its provision.

31 Students report that staff are accessible, helpful and, in general, provide timely and constructive feedback on assessed work. This is not, however, consistent across all courses, either in timing or consistency of feedback. Students on initial teacher training courses and those on information technology courses have good levels of individualised student support. This is achieved through the good practice of effective online tutorial support and a discussion forum, which is operated flexibly to provide feedback and support which fits in with students' work schedules. Students on other programmes have more formal tutorial sessions, which are regularly scheduled but may not support consistent feedback. Students across the provision report that they are well supported in their learning by their tutors and that they have adequate access to staff for tutorial support. To ensure greater consistency in the feedback provided to students, the team considers it desirable that the College develop its internal verification processes to facilitate the audit and assurance of the quality of feedback given to students on their assessed work.

**What are the College's arrangements for staff development to maintain and/or enhance the quality of learning opportunities?**

32 The College ensures that its teaching staff are sufficiently qualified and supported to deliver its courses. This is achieved through the implementation of policies and procedures which cover recruitment, induction and mentor support for new staff, classroom observation, and staff development. As discussed in paragraphs 18 and 19, staff development activity is monitored by the Higher Education Implementation Group, which reports to the Higher Education Strategy Group. Staff are encouraged to engage in development activities, including external events and professional and subject updating, and are able to access College funding to support their development activities.

**How does the College ensure the sufficiency and accessibility of the learning resources the students need to achieve the intended learning outcomes for their programmes?**

33 The College has a good range of resources available to support students. Teaching rooms are equipped with SMART boards and staff post teaching materials to the

virtual learning environment. The learning resource centre has a workspace dedicated to higher education use including networked computers. The College has an effective system for ensuring that library stocks are kept up to date and availability is assured by a combination of multiple copies and a reserved stock policy for key texts. The learning resource centre is developing an e-text resource to further enhance the range of books available to students alongside subscriptions to journals and external databases. Students also have access to the University's learning resources both online and through the library, and both they and staff appreciate this additional resource. The College provides flexible and responsive careers, learning support and advice and guidance services which are valued by students. The team concludes that the College's commitment to, and management of, its learning resource and student support services effectively underpins learning and achievement and represents good practice.

34 Much of the public information is outside the control of the College and is devised at consortium and university level. While this is covered under core theme 3, it is important to note concerns that some of the information contained within course and module handbooks does not convey consistent messages about assessment procedures and regulations. The advice to students with respect to the gravity of the offence of plagiarism, and penalties for late submission of assignments, differs significantly across courses. Students confirmed that their course handbooks are their primary reference point for information on academic regulations. The team noted that this could cause confusion and that inconsistencies should be brought to the attention of those responsible for the drafting of handbooks.

**The team concludes that it has confidence in the College's management of its responsibilities for the quality of the learning opportunities as required by the awarding body to enable students to achieve the intended learning outcomes.**

### **Core theme 3: Public information**

#### **What information is the College responsible for publishing about its HEFCE-funded higher education?**

35 The current SURF Agreement, dated January 2009, details the arrangements for the holding and sharing of copyright across the membership. Collaborative communications between the College and the University are steered by the College marketing team and the Federation office. Responsibilities and requirements relating to the approval of public information are detailed in Section 5 of the University's quality assurance handbook, and College staff are clear about the procedures.

36 Responsibility for publishing FD information is shared between the College and the University. The University produces a document outlining the availability of all its courses at colleges across the whole of the regional federation. Pre-course information for potential students is included in the College prospectus and on its easily navigated website, which has a dedicated higher education area and a link to the University. Students indicated that they found that the website is more up to date than the published prospectus. The University website also provides email links to course leaders and tutors. Details of modes of assessment, employability, available resources and learning support are missing from pre-course information, but there are some inspiring endorsements of the overall student experience from former students. The team identified scope to provide more comprehensive information about the higher education provision at the College, and such action is currently being considered. The team concludes that it is desirable for the College to continue to develop the higher education aspects of the College website.

37 The College uses an induction checklist to ensure information is consistently provided to students at the start of their course, including in course and College handbooks. Students confirmed that the induction programme provided an efficient introduction to their studies. Information for registered students consists primarily of the Need to Know pack, which details the basic entitlements for all SURF students. This is supplemented by the College's student handbook, as well as course and module handbooks. Course handbooks provide detailed information, particularly with regard to regulations and criteria, and are targeted at staff as well as students. Students reported that course handbooks are useful reference sources, while module handbooks are essential working documents often including assessment briefs, marking criteria and module descriptors.

38 The format and content of handbooks for mentors, critical friends and work-based supervisors varies according to the guidance provided by the different faculties within the University, and the different mentoring models that are used within curriculum areas. Feedback from employers, mentors, students and external examiners supports the value of the mentor handbooks, particularly where used to support initial teacher training. The team identifies that the content of the mentor handbook for the FdA Education (Teaching Assistants) is concise, focused specifically on supporting students effectively in the workplace, and could provide a model for other courses.

**What arrangements does the College have in place to assure the accuracy and completeness of information the College has responsibility for publishing? How does the College know that these arrangements are effective?**

39 The checking process for development and joint approval of the prospectus and marketing materials is clearly set out in the partnership agreement with the University. Arrangements for the website, paper publications and for mail-shot material and flyers are all subject to the same checking processes and agreement by the University Federation office. Information for handbooks, assessment briefs and the website is checked and updated by course teams using set templates. This is then forwarded to the Director of Quality and the Higher Education Coordinator for further scrutiny before being passed to the marketing department, who liaise with the Federation office. Formal approval from the University can take as little as 24 hours where necessary. Approved information is uploaded to the College website by the marketing team. The College's External and Internal Communications Policies outline the guiding principles which the College seeks to follow with regard to public information. There are, however, differences in the presentation and content of information both in hard copy and available electronically for students and external stakeholders. The team considers it desirable for the College to continue to develop and apply detailed procedures to underpin its external and internal communications policies in order to effectively embed these in publications.

40 The team identified inconsistencies in the layout and content of both course handbooks and module handbooks, despite course and mentor handbooks forming part of the validation documentation (see also paragraph 34). The link tutor handbook clearly identifies the tutor's responsibility for ensuring the accuracy and currency of the course handbook contents. The team found a number of inconsistencies, including an example of a course handbook that did not carry the University logo, despite checking procedures that should have identified this. While the small inconsistencies identified by the review team do not breach regulations and threaten standards, they nonetheless mean that a consistent message is not delivered to higher education students. The partnership agreement provides the College with limited scope to address inconsistencies in University and consortium-endorsed publications. However, the College could ensure greater consistency through the provision of information in the College handbook and other College publications.

The College has identified this problem and is considering ways in which this can be addressed. The team considers it desirable that the College develop and apply consistent nomenclature to handbooks produced for students and increase their consistency in terms of layout and content. The University is also considering greater standardisation and use of templates in relation to this issue.

41 Many course handbooks and module handbooks are made available electronically as well as in hard copy. Currently, course specifications are made available to students in different ways. Some courses provide copies of specifications during induction, while others are included in course handbooks, or supplied on request. Course specifications are not currently available through the College's virtual learning environment, although information technology and computing staff provide this information through an alternative online medium. The College has no formal mechanism to check that key course materials are made available on the virtual learning environment and there is no explicit minimum requirement identifying what course materials should be uploaded. The review team concludes that it is desirable for the College to adopt a minimum expectation regarding key course information to be made available on the virtual learning environment and to devise and implement checking procedures to ensure this.

**The team considers that reliance can be placed on the accuracy and completeness of the information that the College is responsible for publishing about itself and the programmes it delivers.**

## **C Summary of findings from the Developmental engagement in assessment**

42 The Developmental engagement in assessment took place in May 2010. The lines of enquiry reflected a broad range of assessment issues.

**Line of enquiry 1:** How well does the formative assessment of Foundation Degree students encourage and support their personal development? Are assessments designed that allow this process to take place, and how are students made aware of the importance of personal development before and during their programme of study?

**Line of enquiry 2:** How does the College ensure that the assessment of Foundation Degree modules incorporates assignments that have a work-based focus, are up to date and relevant, and satisfy the learning outcomes and criteria contained within programme specifications?

**Line of enquiry 3:** How does the College ensure compliance with the Staffordshire University assessment policy, and how are staff and students informed of its content?

43 The good practice identified the development of employer-sponsored FDs that meet benchmark requirements and incorporate assessment with a clear work-based focus. The team highlighted the consideration given to the standardisation of marks in advance of the marking process. Workplace mentors who effectively support students in undertaking their assignments were commended.

44 The review team identified as essential that the College review procedures for the administration of assessments and the introduction of an assessment policy. This will ensure tutors are made aware of the requirements of the *Code of practice, Section 6: Assessment of students*, and that tutors are supported through staff development. The College was also

advised to implement measures to enhance staff understanding of the Academic Infrastructure, and to introduce formal procedures for identification of generic assessment issues raised by external examiners. The strengthening of monitoring of assessment documentation and standardisation of assessment information would enhance clarity. The adoption of processes to ensure students receive timely feedback would help provide more consistent support for students.

## D Foundation Degrees

45 The College has replaced much of the HNC/D provision with FDs, with only two of the former remaining. The College has a clear strategy for developing FD provision in response to identified local regional skills requirements in consultation with employers. Current provision covers a range of areas, including complementary therapies, childhood studies, construction, customer service, electrical technology and engineering, information technology for business, leadership and management and social care. The 14 FDs are validated by Staffordshire University and offered through consortium arrangements. A new FD in Logistics is planned and the College is consulting with employers on the development of FDs in Travel and Tourism and Sports Development and Coaching. The College is seeking to develop links with the University of Keele and with Wolverhampton University in order to broaden its range of provision and meet local employment needs, as well as offering progression routes to a wider range of learners qualified at level 3.

46 Foundation Degrees provide enhanced work-based learning opportunities and progression for a wide range of learners, including those currently in employment and those seeking to gain employability skills. Strengths of the provision include good relationships with employers and flexible online learning support, with new and innovative systems being developed to allow responsive interaction and feedback.

47 The team concludes that the College has effective mechanisms for the management of FDs. Courses are reviewed and reports written according to partnership requirements. This provides transparent evaluation of provision, which is monitored at senior management level both in the College and at the University. The good practice and recommendations shown below apply equally to FDs.

## E Conclusions and summary of judgements

48 The Summative review team has identified a number of features of good practice in Stoke on Trent College's management of its responsibilities for academic standards and for the quality of learning opportunities of the awards the College offers on behalf of its awarding body. This was based upon discussion with staff and students and scrutiny of evidence provided by the College and its awarding body, Staffordshire University.

49 In the course of the review, the team identified the following areas of **good practice**:

- the use of the College's virtual learning environment to conduct online evaluation of a Diploma in Teaching in the Lifelong Learning Sector module leads to enhancements to current as well as future provision. It is also effective both in supporting teaching and active learning and as a stimulus for student-led course enhancement (paragraph 28)
- initial teacher training and information technology students receive individualised support through an effective online tutorial and discussion forum which is operated flexibly (paragraph 31)

## Integrated quality and enhancement review

- the College's commitment to, and management of, its learning resource and support services effectively underpins student learning and achievement (paragraph 33)
- the content of the mentor handbook for the FdA Education (teaching assistants) is concise and focused specifically on supporting students effectively in the workplace (paragraph 38).

50 The team also makes some recommendations for consideration by the College and its awarding body.

51 The team considers that it is **advisable** for the College to:

- design a more effective process for capturing necessary data, including from external examiner reports, to inform annual review, quality improvement planning and the transparent follow up and evaluation of consequent actions (paragraph 16)
- ensure that revised assessment procedures are embedded and applied consistently across all courses (paragraph 23)
- embed the consistent use and referencing of the Academic Infrastructure to ensure its effective application to teaching, learning and assessment (paragraph 25).

52 The team considers that it is **desirable** for the College to:

- adopt a process of double-marking, building on the good practice in the Diploma in Teaching in the Lifelong Learning Sector provision, to ensure consistency and accuracy of assessment (paragraph 24)
- devise and implement improved strategies for engagement with students and employers in the review and evaluation of all aspects of its provision (paragraph 30)
- develop its internal verification processes to facilitate the audit and assurance of the quality of feedback given to students on their formally assessed work (paragraph 31)
- develop and apply consistent nomenclature to handbooks produced for students and increase their consistency in terms of layout and content (paragraphs 34, 40)
- continue to develop the higher education aspects of its website (paragraph 36)
- continue to develop and apply detailed procedures to underpin the College's external and internal communications policies in order to effectively embed these in publications (paragraph 39)
- adopt a minimum expectation regarding key course information to be made available on the virtual learning environment and devise and implement checking procedures to ensure this (paragraph 41).

53 Based upon its analysis of the College's self-evaluation, and other documentary evidence and from its meetings with staff and students, the team concludes that it has **confidence** that, in the context of this Summative review, the College discharges its responsibilities effectively, as set out in the relevant partnership agreement for the management of the standards of the awards of its awarding body.

54 Based upon its analysis of the College's self-evaluation, and other documentary evidence and from its meetings with staff and students, the team concludes that it has **confidence** that, in the context of this Summative review, the College discharges its responsibilities effectively, as set out in the relevant partnership agreement for the management of the quality of learning opportunities to enable students to achieve the intended learning outcomes.

55 Based upon its analysis of the College's self-evaluation, and other documentary evidence and from its meetings with staff and students, the team concludes that, in the

context of this Summative review, reliance **can** be placed on the accuracy and completeness of the information that the College is responsible for publishing about itself and the programmes it delivers.

| Stoke on Trent College action plan relating to the Summative review: March 2011   |   |             |  |   |                                 |   |
|---|---|-------------|--|---|---------------------------------|---|
| Good practice   | Action to be taken  | Target date | Action by  | Success indicators  | Reported to                     | Evaluation  |
| In the course of the Summative review the team identified the following areas of <b>good practice</b> that are worthy of wider dissemination within the College:  |   |             |  |   |                                 |   |
| <ul style="list-style-type: none"> <li>the use of the College's virtual learning environment to conduct online evaluation of a Diploma in Teaching in the Lifelong Learning Sector module leads to enhancements to current as well as future provision. It is also effective both in supporting teaching and active learning</li> </ul> | <p>Delivery of a 'sharing good practice' session to all other delivery teams re: course evaluation</p> <p>Develop a college-wide specific higher education online survey to enhance provision</p> | July 2011   | Assistant Director Continuing Professional Development (CPD) | <p>Positive learner feedback re: quality of provision</p> <p>Improved retention on HE courses</p> | Higher Education Strategy Group | <p>Termly Quality Boards</p> <p>Self Assessment Reports: College and curriculum areas</p> <p>Learner feedback</p> |

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| and as a stimulus for student-led course enhancement (paragraph 28)   |  |           |  |   |  |   |
| <ul style="list-style-type: none"> <li>initial teacher training and information technology students receive individualised student support through an effective online tutorial and discussion forum which is operated flexibly (paragraph 31)</li> </ul> | <p>Extend current 'Moodle site' to incorporate online tutorial and discussion forums for all higher education learners</p> <p>Deliver induction training for both: staff, students</p> | Sept 2011 | <p>Educational Technologist</p> <p>Quality Administrator</p>   | <p>Improved lines of communication</p> <p>Positive learner feedback</p> <p>Flexible access to support impacting on retention levels</p> | Quality meetings, Higher Education Strategy Group                    | Learner feedback. Self Assessment Reports: College and curriculum area  |
| <ul style="list-style-type: none"> <li>the College's commitment to, and management of, its learning resource and support services effectively underpins student learning and achievement</li> </ul>   | <p>Continual annual review and enhancement of learning resources and support services for students</p> <p>Scheduled study skills induction for</p>                                     | Sept 2011 | <p>Learning Resources Manager</p> <p>Learner Support Manager</p> <p>Higher Education Coordinator</p> | <p>Positive learner feedback - increased learner satisfaction</p> <p>Higher levels of learner attainment and achievement</p>            | <p>Higher Education Strategy Group</p> <p>Senior Management Team</p> | <p>Learner feedback. Self Assessment Reports: College and curriculum area</p> <p>Learning resources - annual learner survey</p> |

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| (paragraph 33)   | all higher education learners prior to course commencement  |                    |                     |  |   |  |
| <ul style="list-style-type: none"> <li>the content of the mentor handbook for the FdA Education (teaching assistants) is concise and focused specifically on supporting students effectively in the workplace (paragraph 38).</li> </ul> | To work with the University to review and develop mentor handbooks for all Foundation Degrees based on good practice identified | Sept 2011          | Assistant directors | Enhanced workplace support and awareness of academic requirements<br><br>Increased retention of learners | Higher Education Implementation Group                         | Higher Education Strategy Group, Quality Team                            |
| <b>Advisable</b>   | <b>Action to be taken</b>   | <b>Target date</b> | <b>Action by</b>    | <b>Success indicators</b>  | <b>Reported to</b>  | <b>Evaluation</b>  |
| The team considers that it is <b>advisable</b> for the College to:   |   |                    |                     |  |   |  |
| <ul style="list-style-type: none"> <li>design a more effective process for capturing necessary data, including from external examiner reports,</li> </ul>  | Monthly College quality meeting to identify progress against actions from external examiner reports and issues notified         | From May 2011      | Quality Director    | Timely completion of actions from external reports<br><br>Consistent approach to quality                 | Senior Management Team<br><br>Higher Education Strategy Group | Termly Quality Boards<br><br>Annual review of higher education provision |

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| <p>to inform annual review, quality improvement planning and the transparent follow up and evaluation of consequent actions (paragraph 16)</p> | <p>by Link Tutor</p> <p>Monthly College quality meeting to identify and action appropriate CPD arising from external examiner reports, Termly Quality Boards and learner feedback</p> <p>Outcomes of monthly College quality meetings to be presented to Higher Education Strategy Group</p> <p>Continue to work closely with University Link Tutors to monitor progress against actions</p> <p>Upload best practice onto Moodle site</p> |  | <p>Assistant directors</p> | <p>improvement across higher education provision</p> |  |  |
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| <ul style="list-style-type: none"> <li>ensure that revised assessment procedures are embedded and applied consistently across all courses (paragraph 23)</li> </ul>  | <p>Review all public information regarding assessment regulations and standardise</p> <p>Provide ongoing training and reinforcement for staff in relation to new procedures which have been designed to meet academic regulations set by the University</p> | <p>Sept 2011</p>                              | <p>Higher Education Coordinator,<br/>Director of Quality,<br/>University Partnership Manager</p> | <p>Consistent approach across the organisation and external partners reflected through positive learner feedback and external examiner reports</p> | <p>Higher Education Strategy Group</p>                     | <p>External examiner reports</p> <p>University standardisation meetings</p> <p>Annual review of higher education provision</p> |
| <ul style="list-style-type: none"> <li>embed the consistent use and referencing of the Academic Infrastructure to ensure its effective application to teaching, learning and assessment (paragraph 25).</li> </ul> | <p>Complete course handbook audit and present recommendations for change</p> <p>Reinforce Academic Regulations during induction and throughout course duration</p>  | <p>June 2011</p> <p>Sept 2011 - July 2012</p> | <p>Higher Education Coordinator</p>  | <p>Consistent approach across the organisation reflected through positive learner feedback and external examiner reports</p>                       | <p>Quality Team</p> <p>Higher Education Strategy Group</p> | <p>External examiner reports</p> <p>Learner feedback</p> <p>Annual review of higher education provision</p>                    |

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|   | Standardise module handbooks in relation to assessment in accordance with academic standards<br><br>Continue to provide updated training re: Academic Infrastructure for all staff | Sept 2011          | Assistant directors<br><br>HE Coordinator<br><br>Assistant Director CPD | College-wide embedded consistent approach re: Academic Infrastructure   |                                 |  |
| <b>Desirable</b>  | <b>Action to be taken</b>  | <b>Target date</b> | <b>Action by</b>  | <b>Success indicators</b>   | <b>Reported to</b>              | <b>Evaluation</b>                                      |
| The team considers that it is <b>desirable</b> for the College to:  |  |                    |   |   |                                 |  |
| <ul style="list-style-type: none"> <li>adopt a process of double-marking, building on the good practice in the Diploma in Teaching in the Lifelong Learning Sector provision, to</li> </ul> | Embed good practice across all higher education teams re: double marking via Higher Education Implementation Group meetings/workshop sessions                                      | July 2011          | Higher Education Coordinator  | Consistent practice across the organisation<br><br>Positive approach to fair and consistent practice for all learners | Higher Education Strategy Group | Annual Higher Education report<br><br>Learner feedback |

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| ensure consistency and accuracy of assessment (paragraph 24)  |  |                                   |  |   |   |   |
| <ul style="list-style-type: none"> <li>devise and implement improved strategies for engagement with students and employers in the review and evaluation of all aspects of its provision (paragraph 30)</li> </ul> | <p>Extend current College Employer Survey to all employers involved in higher education training of an individual</p> <p>Ensure learner contribution to Self Assessment process re: higher education provision</p> | July 2011                         | Director of Employer Engagement  | <p>Improved engagement with employers</p> <p>Employer/learner involvement in shaping future provision and change to existing provision</p> <p>Stronger links with workplace mentors</p> | <p>Higher Education Coordinator</p> <p>Quality Director</p> | <p>Employer feedback</p> <p>Annual Higher Education report</p> <p>Self Assessment reports: College and curriculum areas</p> |
| <ul style="list-style-type: none"> <li>develop its internal verification processes to facilitate the audit and assurance of the quality of feedback given to students on their formally</li> </ul>                | <p>Attend scheduled University training re: feedback and disseminate to all delivery teams</p> <p>Provide 'sharing of good practice' workshop sessions re: quality of written feedback</p>                         | <p>July 2011</p> <p>July 2012</p> | <p>College Link Higher Education Tutors</p> <p>Higher Education Coordinator</p> <p>Director of Quality</p> | <p>Increased HE Delivery team awareness of feedback requirements</p> <p>Ongoing support for staff to ensure consistent approach to assessment</p>                                       | <p>Higher Education Coordinator</p>                         | <p>Annual report</p> <p>Higher Education Standardisation meeting(s) report</p> <p>External examiner reports</p>             |

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| assessed work (paragraph 31)   | provided in current year (ongoing)<br><br>Arrange Internal Verification days in-house prior to University standardisation meetings with a focus on timeliness and quality of feedback  | July 2012                         | Higher Education Coordinator  | Improved outcomes at University standardisation meetings  |  |  |
| <ul style="list-style-type: none"> <li>develop and apply consistent nomenclature to handbooks produced for students and increase their consistency in terms of layout and content (paragraphs 34, 40)</li> </ul> | <p>Work with the Faculties within the University to ensure a consistent approach to handbooks</p> <p>Minimum expectation criteria for handbooks to be produced and benchmarked against</p> <p>All handbooks uploaded onto the virtual learning</p> | <p>Sept 2011</p> <p>June 2011</p> | <p>Higher Education Coordinator</p> <p>Higher Education Coordinator</p> | <p>Standardised handbooks across higher education provision with minimum requirements adhered to and agreed with the University</p> | <p>Higher Education Strategy Group</p> | <p>External examiner reports</p> <p>University Standardisation Meetings</p> <p>College Quality Reviews</p> |

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|  | environment.   |               |   |   |                                 |  |
| <ul style="list-style-type: none"> <li>continue to develop the higher education aspects of its website (paragraph 36)</li> </ul>   | Provide up-to-date, relevant, detailed information regarding higher education provision on the new College website - <i>live website</i> | From May 2011 | Assistant Director: Recruitment and Marketing | Live, current, up-to-date information covering all relevant aspects of higher education | Senior Management Team          | Learner feedback.<br>Employer feedback<br>Self Assessment Reports.<br>Recruitment statistics |
| <ul style="list-style-type: none"> <li>continue to develop and apply detailed procedures to underpin the College's external and internal communications policies in order to effectively embed these in publications (paragraph 39)</li> </ul> | Review and revise the College's current procedures relating to external and internal communication                                       | Sept 2011     | Director of Quality                           | Clarity both internally and externally re: communications policies and procedures       | Senior Management Team          | Annual Quality review procedures   |
|  | Reinforce quality control of all public information through continuous quality improvement procedures                                    | May 2011      | Director of Quality                           | Greater understanding and adherence to policies and procedures set                      | College Corporation             |  |
| <ul style="list-style-type: none"> <li>adopt a minimum expectation regarding key course information to be made available</li> </ul>  | Provide a list of minimum requirements for delivery teams which identifies key information to be provided on the                         | July 2011     | HE Coordinator                                | Improved lines of communication and information available to learners                   | Higher Education Strategy Group | College Quality Reviews<br><br>Learner feedback<br><br>External examiner reports             |

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| <p>on the virtual learning environment and devise and implement checking procedures to ensure this (paragraph 41).</p> | <p>virtual learning environment (VLE) (both staff and learner VLE)</p> <p>Termly audits by the Quality Team to review adherence to the minimum requirement set</p> | <p>July 2011 - July 2012</p> | <p>Director of Quality</p> | <p>Information available to all learners consistently</p> |  |  |
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**RG 729 06/11**

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