

Higher Education Review (Plus) of London Training Academy Ltd

July 2015

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About this review

This is a report of a Higher Education Review (Plus) conducted by the Quality Assurance Agency for Higher Education (QAA) at the London Training Academy Ltd. The review took place from 28 to 30 July 2015 and was conducted by a team of two reviewers, as follows:

- Professor Donald Pennington
- Miss Sarah Riches.

The main purpose of the review was to investigate the higher education provided by the London Training Academy and to make judgements as to whether or not its academic standards and quality meet UK expectations. These expectations are the statements in the UK Quality Code for Higher Education (the Quality Code)¹ setting out what all UK higher education providers expect of themselves and of each other, and what the general public can therefore expect of them.

In Higher Education Review (Plus) the QAA review team:

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

In Higher Education Review (Plus) there is also a check on the provider's financial sustainability, management and governance (FSMG). This check has the aim of giving students reasonable confidence that they should not be at risk of being unable to complete their course as a result of financial failure of their education provider.

A summary of the findings can be found in the section starting on page 2. <u>Explanations of the findings</u> are given in numbered paragraphs in the section starting on page 5.

In reviewing London Training Academy Ltd the review team has also considered a theme selected for particular focus across higher education in England and Northern Ireland. The themes for the academic year 2014-15 are Student Involvement in Quality Assurance and Enhancement and Student Employability, and the provider is required to select, in consultation with student representatives, one of these themes to be explored through the review process.

The QAA website gives more information <u>about QAA</u> and its mission.³ A dedicated section explains the method for <u>Higher Education Review (Plus)</u>.⁴ For an explanation of terms see the <u>glossary</u> at the end of this report.

www.gaa.ac.uk/publications/information-and-guidance/publication?PubID=106

¹ The UK Quality Code for Higher Education is published at: www.gaa.ac.uk/quality-code

² Higher Education Review themes:

³ QAA website: www.qaa.ac.uk/about-us.

⁴ Higher Education Review (Plus): www.qaa.ac.uk/en/ReviewsAndReports/Pages/Educational-Oversight-.aspx

Key findings

QAA's judgements about London Training Academy Ltd

The QAA review team formed the following judgements about the higher education provision at London Training Academy Ltd.

- The maintenance of the academic standards of awards offered on behalf of its degree-awarding bodies and/or other awarding organisations does not meet UK expectations.
- The quality of student learning opportunities does not meet UK expectations.
- The quality of the information about learning opportunities **requires improvement to meet** UK expectations.
- The enhancement of student learning opportunities requires improvement to meet UK expectations.

Recommendations

The QAA review team makes the following **recommendations** to London Training Academy Ltd.

By December 2015:

- establish and implement formal and robust procedures in order to ensure that awarding organisation frameworks and regulations for the award of credit and qualifications are met (Expectation A2.1)
- establish and implement valid and reliable processes for the assessment of students (Expectations A3.2 and B6)
- ensure that all teaching staff are fully aware of, and implement, OTHM's requirements and procedures for the award of credit (Expectations A3.4, A2.1 and B3)
- establish and implement formal procedures for the development and approval of new programmes (Expectations B1 and A3.1)
- ensure that OTHM's entry requirements and the College's admissions policy and procedures are followed (Expectation B2)
- further develop and implement approaches which enable students to develop as independent learners (Expectation B3)
- provide students with opportunities to develop professional knowledge and practical understanding of the tourism and hospitality sector (Expectation B4)
- provide support for staff to gain professional experience of the tourism and hospitality sector (Expectation B4)
- develop and implement formal systems to promote the engagement of students in the assurance and enhancement of their educational experience (Expectation B5)
- establish and implement formal policy and procedures for the monitoring and review of programmes (Expectation B8 and A3.3)
- ensure that it refers students to information about the appeals procedure of the awarding organisation (Expectation B9)
- develop and implement formal policy and procedures to ensure that information about higher education provision is fit for purpose and trustworthy (Information)
- develop and implement a strategic approach to the enhancement of student learning opportunities (Enhancement).

By April 2016:

 establish and implement formal policy and procedures for responding to reports from external verifiers (Expectation B7).

Affirmation of action being taken

The QAA review team **affirms** the following actions that London Training Academy Ltd is already taking to make academic standards secure and/or improve the educational provision offered to its students.

• The steps being taken to draw on external advice and guidance on the management and development of the provider from its Corporate Governance Advisory Board (Expectation A3.4).

Theme: Student Involvement in Quality Assurance and Enhancement

The small number of students currently studying at the College has enabled its informal approach to student engagement to operate satisfactorily. While the College is responsive to matters raised by students, the absence of a formal system for, and of a consistent approach to, student membership of College committees make it difficult to identify clearly instances of student engagement enhancing the learning experience. Reviewers found confusing evidence in respect of the committees whose composition includes student representation, and no evidence to support the College's claim that students play a valuable role during periodic validation and periodic review events nor the claim that students engage with external verifiers.

Further explanation of the key findings can be found in the handbook available on the QAA webpage explaining Higher Education Review (Plus).

About London Training Academy Ltd

The London Training Academy Ltd (the College) is a provider of higher education situated in Woolwich, in south-east London. Founded in 2013, it has been under its current management since September 2014. Its goal is to develop students as individuals who are creative and inventive, and are prepared to contribute significantly to their communities.

The College offers programmes of study leading to awards of OTHM Qualifications (OTHM) and Highfield Awarding Body for Compliance. At the time of the review, the only programme running was the Level 5 OTHM Diploma in Tourism and Hospitality Management, on which four students were enrolled. In 2014 the College ran the OTHM Level 6 Diploma in Tourism and Hospitality Management with three students and the Level 5 OTHM Diploma in Tourism and Hospitality Management with two students. The College employs a total of seven academic and administrative staff, both full and part-time.

This review is the College's first engagement with QAA. The College aims to provide students with high quality teaching in order to allow them to attain their award in the least possible time and to achieve sustainable student numbers by 2016. It aspires to expand to a total student body of about 50.

Explanation of the findings about London Training Academy Ltd

This section explains the review findings in more detail.

Terms that may be unfamiliar to some readers have been included in a <u>brief glossary</u> at the end of this report. A fuller <u>glossary of terms</u> is available on the QAA website, and formal definitions of certain terms may be found in the operational description and handbook for the <u>review method</u>, also on the QAA website.

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

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

- a) ensure that the requirements of The framework for higher education qualifications in England, Wales and Northern Ireland are met by:
- positioning their qualifications at the appropriate level of the relevant framework for higher education qualifications
- ensuring that programme learning outcomes align with the relevant qualification descriptor in the relevant framework for higher education qualifications
- naming qualifications in accordance with the titling conventions specified in the frameworks for higher education qualifications
- awarding qualifications to mark the achievement of positively defined programme learning outcomes
- b) consider and take account of QAA's guidance on qualification characteristics
- c) where they award UK credit, assign credit values and design programmes that align with the specifications of the relevant national credit framework
- d) consider and take account of relevant Subject Benchmark Statements.

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

- 1.1 The College is an approved centre of OTHM Qualifications (OTHM) and of the Highfield Awarding Body for Compliance. OTHM awards are recognised and regulated by the Office of the Qualifications and Examinations Regulator (Ofqual) and OTHM has its own credit and qualifications framework for ensuring that its diplomas are appropriately designed and positioned on the Qualifications Credit Framework (QCF). Currently the College delivers a single programme, leading to the OTHM award of a Level 5 Diploma in Tourism and Hospitality Management.
- 1.2 While OTHM does not make explicit use of *The Framework for Higher Education Qualifications in England, Wales and Northern Ireland* (FHEQ) or of relevant Subject Benchmark Statements, its qualifications are positioned on the QCF. The Expectation is met because the awarding organisation has responsibility for ensuring that its qualifications are at an appropriate level and that learning outcomes align with the QCF.
- 1.3 In order to test this Expectation the review team considered evidence from the OTHM website, the OTHM programme specification for the Diploma in Tourism and Hospitality Management, evidence submitted by the College, its supporting documentation, and from meetings with staff of the College.

- 1.4 The College's failure to demonstrate an awareness of the FHEQ or of Subject Benchmark Statements relevant to its provision is indicative of its failures to engage with the threshold academic standards of the Diploma and to understand how teaching and assessment should align to the appropriate academic standards.
- 1.5 Nevertheless Expectation A1 is met because the awarding organisation has responsibility for ensuring that its qualifications and learning outcomes align with the QCF. The level of associated risk is moderate because the College's lack of awareness of the alignment of its qualifications with the FHEQ and relevant Subject Benchmark Statements constitutes a weakness in the operation of its governance structure.

Expectation: Met

Level of risk: Moderate

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

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

Findings

- 1.6 The awarding organisation's requirements for the delivery of its programmes by approved centres are set out in programme specifications and on its website. The College's Academic Management Committee and its Executive Management are responsible for deliberation and decision making in respect of its higher education provision.
- 1.7 These arrangements allow the Expectation to be met.
- 1.8 The review team scrutinised documentation from the awarding organisation and records of meetings of the College's committees, and held meetings with senior managers and teaching staff, including the Principal and the Academic Co-ordinator. The review team noted references in the College's documentation to other committees, which appear not to have met and whose place within the committee structure was unclear.
- The review team found a number of shortcomings in respect of the College's 1.9 relationship with OTHM and a confused understanding within the College of its own responsibilities towards this awarding organisation. It became apparent during the visit that the College had not registered students with OTHM in a timely manner. As described in Expectation B2, OTHM's requirements for admission to the Diploma have not been adhered to by the College and there is not a formal policy and procedure for the recognition of prior learning. The College's committees have not met on a regular basis and the very brief notes of meetings that have taken place show little evidence of discussion of OTHM's requirements and policy development. As described in Expectation A3.2, the College does not follow all of OTHM's procedures in respect of assessment of students. The College is only partially aware of the requirements of the awarding organisation and does not have a formal and systematic approach to ensuring that its staff are made aware of and adhere to these requirements. This contributed to the formulation of the recommendation in Expectation A3.4 in respect of the awareness on the part of teaching staff of OTHM's requirements and procedures for the award of credit. The review team recommends that the College establish and implement formal and robust procedures in order to ensure that awarding organisation frameworks and regulations for the award of credit and qualifications are met.
- 1.10 The College has failed to ensure that the awarding organisations' requirements are fully met at all times and has failed to establish effective procedures for doing so. These failings demonstrate ineffective operation of the College's governance structure and show significant gaps in its policy and procedures in respect of quality assurance. Expectation A2.1 is not met and the level of associated risk is serious.

Expectation: Not met Level of risk: Serious

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

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

Findings

- 1.11 OTHM maintains definitive records for each of its programmes and produces detailed programme specifications. Any changes which it makes to the programme are communicated to its approved centres for implementation. OTHM produces certificates and transcripts for students when awards are made. The College states that the current programme specification is available on its website and on its virtual learning environment (VLE). Additionally, it provides a paper copy of the programme specification for staff and students.
- 1.12 These arrangements allow the Expectation to be met.
- 1.13 The review team scrutinised the awarding organisation's programme specification, held meetings with staff and students, and examined the College's website and VLE.
- 1.14 Staff and students are aware of the awarding organisation's programme specification for the Diploma in Tourism and Hospitality Management. The programme specification is available on the College's VLE: at the time of the visit the College had not placed this on its website, although some information about the units making up the programme was available there.
- 1.15 The awarding organisation is responsible for producing accurate and up-to-date programme specifications for its awards, and the College makes these available to staff and to students. Expectation A2.2 is met and the associated level of risk is low.

Expectation: Met Level of risk: Low

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

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

- 1.16 The College was initially approved by OTHM to offer its qualifications from March 2014; the approval was renewed for a three-year period in June 2015. OTHM is responsible for the development and design of programmes leading to its qualifications. Descriptors of the qualifications and component units are set out in programme specifications published by the awarding organisation and made available to delivery centres through a secure portal on its website. The programme specifications include the relevant QCF level descriptor, the overall aims and learning outcomes for the qualification and learning outcomes, assessment criteria and assessment requirements for each unit. At the time of the review visit the College was delivering OTHM's Level 5 Diploma in Tourism and Hospitality Management, which had recently been revised for implementation from March 2015. At the same time, OTHM introduced new arrangements for assessment that place greater responsibility on approved centres for the design of assessment tasks and the marking and internal verification of students' work.
- 1.17 As the responsibility for the design of qualifications, programmes and units rests with the awarding organisation, the Expectation is met.
- 1.18 The review team considered a range of documentation, including OTHM programme specifications, the College's policies, minutes of management and Programme Team meetings and held discussions with the Principal and staff.
- 1.19 The review team was unable to identify any preparations made by the College for the changes to the Level 5 Diploma in March 2015. The minutes of management and Programme Team meetings make no reference to the revisions to the programme specification or the changes to OTHM's assessment practices, nor did the College provide any evidence of any training or development taking place for teaching staff to help them prepare for the changes.
- 1.20 The College asserts that it has a formal procedure for the development of its programme offer, but the documentation provided to the review team relates to internal reviews of programmes. Scrutiny of documentation provided by the College did not provide any evidence of an internal process for identifying, selecting and preparing for the delivery of new (or revised) programmes. The minutes of a Programme Team meeting in March 2015 indicated the College's intention to introduce a new programme and staff confirmed plans to broaden the Academy's portfolio to include business and management programmes. The review team was informed that OTHM centre approval entitled the College to deliver any of its qualifications without the need for further approval.
- 1.21 The review team concludes that the College meets Expectation A3.1 as the awarding organisation is responsible for the approval of programmes delivered by the College. However, the absence of a formal internal approval procedure for the identification and selection of new programmes and of discernible arrangements for preparing staff for the delivery and assessment of new or revised programmes constitute weaknesses in the operation of the College's governance structure and contribute to the recommendation in

Expectation B1 in respect of procedures for the development and approval of new programmes. Expectation A3.1 is met and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

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

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

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

- Programme specifications are published by OTHM and set out learning outcomes 1.22 at programme and unit level, assessment criteria and, for the Level 5 Diploma in Tourism and Hospitality Management, the assessment requirements. For students registered before March 2015, OTHM designed the assessment tasks and marked work submitted by students for assessment, while delivery centres were responsible for preparing students for assessment. The first cohort of the College students successfully completed their programmes in December 2014 under these arrangements. In spring 2015 OTHM revised the programme specification for the Level 5 Diploma in Tourism and Hospitality and introduced a new system of centre-based assessment. Under the new system centres are responsible for designing assessment tasks; these must be approved by OTHM before they are distributed to students. Centres undertake first marking and internal verification; students' work must be verified by an OTHM standards verifier either as part of a visit to a centre or remotely before certification is released. In preparation for the new arrangements OTHM required centres to provide specified assessment policies and procedures, including the centre's system of internal verification, student appeals, academic malpractice and recognition of prior learning.
- 1.23 The systems put in place by the awarding organisation allow the Expectation to be met.
- 1.24 The review team examined programme specifications, communications from OTHM to its centres, the College's policies and procedures related to assessment, assessment tasks approved by OTHM and draft assessment briefs yet to be submitted to OTHM for approval, the College's academic calendar and students' assessed work. The team also met staff and students in order to discuss policy and practice in relation to assessment.
- 1.25 At the time of the review visit, students had completed their first semester in which they had studied and completed assessments for two units, and were midway through their second semester studying a further two units but had not yet received the approved assessment briefs for these units. The team noted that in respect of the assessments for the first two units, the students had been permitted to submit work for assessment which did not meet the requirements of the assessment briefs approved by OTHM. Staff explained that the case studies which form the basis of the assessments are illustrative and students are allowed to select an organisation of their choice, provided they address the learning outcomes and assessment criteria specified for the unit. However, the written briefs approved by OTHM did not include any instructions of this nature. Students' work, which in one instance was based on a car manufacturer rather than an organisation associated with hospitality and tourism, had been assessed as achieving pass marks by the first marker. Internal verification of the assessed work for the first two units was due to take place after the review visit. Staff of the College expected that external verification by OTHM would take place in February 2016 after all six units had been completed.

- 1.26 The College has policies and procedures for internal assessment and for internal verification. These state that the 'Director of Studies' or any nominated person will fulfil the role of internal verifier. However the College's organisational structure does not include the role of Director of Studies and the job description for the Academic Co-ordinator does not include verification of assessments. Teaching staff informed the review team that they verified each other's assessment practices and the review team saw evidence of this process in respect of verification of assignment briefs.
- 1.27 The College has in place a policy and procedure to deal with academic dishonesty and plagiarism and has produced guidance for students in this regard. The rubric on assessment briefs also reminds students of the importance of avoiding plagiarism. As part of its new assessment procedures OTHM requires its centres to ensure that students' work is accompanied by a plagiarism report. The College does not currently have access to plagiarism-detection software but does have plans to subscribe to it in the future. While teaching staff told the review team that they check the authenticity of students' work using their personal access to plagiarism-detection software, the student submissions for the first two units did not include a plagiarism report and no examples of such checks were made available to the review team.
- 1.28 The review team found a number of shortcomings in the College's assessment practices. Internal verification activities were being carried out by means of two assessors each verifying the other's work. Although not in direct contravention of the College's policy, this arrangement does not enable secure oversight of standards. Teaching staff had permitted students to submit assignments which did not meet the requirements of the approved assessment brief, and the College was unable to provide evidence that students' work had been checked for authenticity as required by OTHM. These factors heighten the risk that students may be unable to demonstrate that they have met the learning outcomes to the satisfaction of OTHM, since verification by OTHM is carried out only after students have completed their programme. Formal internal verification of summative assessments had not yet been completed, although students had submitted work for assessment some four weeks previously. The College has yet to access training on assessment offered by the awarding organisation. Assessment briefs for units in the process of being delivered had not been submitted to OTHM for approval.
- 1.29 Collectively these shortcomings expose significant gaps in the College's policy and procedures and demonstrate breaches of its own quality assurance procedures. The review team **recommends** that the College should establish and implement valid and reliable processes for the assessment of students. Expectation A3.2 is not met and the associated level of risk is serious.

Expectation: Not Met Level of risk: Serious

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

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

Findings

- 1.30 The awarding organisation is responsible for monitoring and periodically reviewing its programmes and ensuring that they address UK threshold academic standards. The review team noted apparently conflicting statements regarding responsibility for monitoring of programmes: while in its documentation the College asserted that it regularly monitors and reviews its programmes, its statement of its responsibilities with respect to OTHM affirms that the responsibility for annual monitoring rests with OTHM through the system of external verifier visits. The College claims responsibility for undertaking periodic review.
- 1.31 The absence of a formal set of processes for monitoring and reviewing programmes means that the Expectation is not met, and contributes to the recommendation in Expectation B8 in respect of the monitoring and review of programmes.
- 1.32 The team tested the Expectation by examining the College's policies and procedures, reading minutes of Programme Team meetings and meeting staff and students.
- 1.33 The various policies presented by the College do not contain a definitive process whereby the College monitors and reviews its alignment with the awarding organisation's standards. Programmes are monitored on an ongoing basis by the programme team at its monthly meetings but the minutes provide little evidence of informed debate about the maintenance of academic standards. For instance, although revisions to specifications for OTHM courses and the introduction of centre-based assessment had clear consequences for the College's responsibilities for securing and maintaining the academic standards of the programmes it delivers, the review team found no evidence of discussion about these changes or their consequences.
- 1.34 Although the College's first cohort of students had completed their programmes in 2014, the only evidence provided of any review of programmes taking place is to be found in the annual report. While it briefly mentions the Level 5 Diploma completed by two students, the report makes no mention of the Level 6 Diploma which ran that year and was completed by three students. There is no reference to academic standards other than noting that all students passed. The College's systems for monitoring academic standards are not effective.
- 1.35 The College does not have a clear understanding of its responsibilities and those of OTHM in respect of the monitoring and review of programmes. It lacks a definitive set of processes for carrying out its responsibilities in respect of the maintenance of academic standards and there is little evidence of informal monitoring activity. These failings constitute a significant gap in the College's policy and procedures in relation to its arrangements for quality assurance and demonstrate ineffective operation of parts of its governance structure. Expectation A3.3 is not met and the associated level of risk is serious.

Expectation: Not Met Level of risk: Serious

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

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

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

- 1.36 The College has a Corporate Governance Advisory Board whose role is 'to determine the mission, ethos and values of the College, monitor performance, ensure financial health and protect assets'. The Board comprises three external members, who between them have experience in college management and general business, and two internal members: the Principal and the Academic Co-ordinator. The College intends that the Board will meet either two or three times a year.
- 1.37 The College is also able to draw on the expertise provided by OTHM. Information on OTHM's website indicates that delivery centres can expect a centre visit as part of its approval arrangements and in March 2015 it indicated that it would be implementing a programme of Centre Monitoring and Compliance. The new arrangements for centre-based assessment involve verification of students' work by an OTHM external verifier. OTHM is responsible for the appointment, training and management of external verifiers.
- 1.38 These arrangements enable the Expectation to be met.
- 1.39 The team considered documentation relating to the Corporate Governance Advisory Board and held meetings with College managers, staff and students to explore how the College makes use of external expertise to set and maintain academic standards.
- 1.40 At the time of the review visit the Corporate Governance Board had met on only one occasion (in February 2015). The agenda for the meeting contains only one substantive item and the minutes of the discussions are very brief. The Principal informed the team that this was an initial meeting at an early stage in the College's development and that another meeting was planned for later in the year when more substantial issues would be discussed. Noting the potential value to the College of external advice and guidance in developing its provision and in establishing policy and procedures to secure academic standards, the review team **affirms** the steps being taken to draw on external advice and guidance on the management and development of the provider from its Corporate Governance Advisory Board.
- 1.41 The review team considered the College's awareness of and alignment with the OTHM's arrangements for setting and maintaining standards. Although the College has been approved as a delivery centre by OTHM since March 2014, the current management was not aware of any visits by OTHM to the College, nor were they able to provide a copy of any report that might have been produced as part of the accreditation process. The College has not yet been advised by OTHM of a Centre Monitoring and Compliance visit date. In 2015 OTHM introduced a new assessment system which devolved greater levels of responsibility to providers. While OTHM felt the need to offer training to providers' staff and had indicated in March 2015 that it would provide training for assessors and internal verifiers within six to eight weeks. The Principal stated that the College had not asked for training for its staff on the grounds that student numbers were small and that communication with OTHM

by phone was easy. There was no evidence that staff of the College had been briefed about the new arrangements. The review team **recommends** that the College should ensure that all teaching staff are fully aware of, and implement, OTHM's requirements and procedures for the award of credit.

1.42 The College is aware of sources of external expertise and has made some use of the advice and guidance provided by external members of the Corporate Governance Advisory Board and of the support provided by OTHM. However, the lack of full effectiveness in the work of the Board constitutes a weakness in the operation of the College's governance structure, and the College's failure to take up opportunities to access training from OTHM in respect of its new responsibilities demonstrates insufficient priority given to assuring standards in its planning processes. Expectation A3.4 is met, and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

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

- 1.43 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. Three of the seven Expectations for this judgement area have not been met; the level of risk was judged to be serious for each of these Expectations and to be moderate for three others.
- 1.44 The College lacks formal and robust procedures for ensuring that it meets OTHM's requirements in respect of the award of credit and of qualifications. It has not taken steps to ensure that its teaching staff are aware of these requirements. It has not established valid and reliable procedures for the assessment of students. The review team formed the view that these failings constitute major gaps in its arrangements for maintaining academic standards.
- 1.45 There are no findings of good practice relating to this judgement area.
- The review team makes three recommendations relating to this judgement area. The first relates to arrangements for meeting the awarding organisation's framework and regulations. The second follows from the lack of valid and reliable procedures for the assessment of students. The third is in respect of ensuring that the College's staff are aware of the requirements of the awarding organisation as regards the award of credit and qualifications. Additionally, the recommendation in Expectation B1 in relation to the establishment of procedures for the development and approval of new programmes and the recommendation in Expectation B8 in relation to the establishment of procedures for the monitoring and review of programmes are relevant to this judgement area. These recommendations collectively relate to significant gaps in the College's policy and procedures in relation to its arrangements for quality assurance, and demonstrate ineffective operation of parts of its governance structure and breaches of its own quality assurance procedures.
- 1.47 The review team makes one affirmation relating to the contribution to the College's provision made by its Corporate Governance Advisory Board.
- 1.48 On the basis of the documentation provided and meetings with staff and students, the review team concludes that the maintenance of the academic standards at the London Training Academy of awards offered on behalf of its awarding organisations **does not meet** UK expectations.

2 Judgement: The quality of student learning opportunities

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

Quality Code, Chapter B1: Programme Design, Development and Approval Findings

- 2.1 Responsibility for the design, development and approval of the programmes offered by the College rests primarily with OTHM. OTHM offers a range of qualifications in Tourism and Hospitality Management and Business Management at Levels 4 to 7 and a number of stand-alone awards at Levels 3 and 4. As an approved OTHM centre, the College is permitted to deliver any OTHM programmes regardless of its level. The College was approved initially in March 2014, with accreditation renewed for three years from June 2015.
- 2.2 Although the College stated that it has a formal procedure for the approval of new programmes, the statement of the procedure relates to the review of existing programmes. The lack of adequate and documented preparation for the delivery of new courses constitutes a significant gap in policy and structures in relation to quality assurance. The team **recommends** that the College establishes and implements formal procedures for the development and approval of new programmes.
- 2.3 The team tested the operation of the Expectation by considering a range of documentation, including the College's policies, and minutes of management and Programme Team meetings, and held discussions with the Principal and staff.
- 2.4 The review team explored with staff how they decided which programmes to offer and how they ensured that appropriate resources are in place for effective delivery. The team heard that the selection of any new programmes would be based on the College's perception of student demand and level of competition from other providers, while the resources required to deliver new programmes would be considered in management meetings. In spring 2015 OTHM revised the specification for the Level 5 Diploma in Tourism and Hospitality Management and introduced a new assessment regime which devolved greater responsibility to centres. Although the Programme Team met each month during this period, there is no record of any discussions related to these changes. While the minutes do refer to the College's intention to offer a new programme in business for the next intake in July 2015, there is no recorded discussion about the selection of an awarding organisation, nor about preparations for delivery or the adequacy of learning resources.
- 2.5 The College does not have a formal process for the development and approval of programmes and its informal processes for preparing for the delivery of new or revised programmes are ineffective. Expectation B1 is not met and the associated level of risk is serious.

Expectation: Not met Level of risk: Serious

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

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

- 2.6 OTHM delegates responsibility to the College for recruitment, selection and admission of students, and the College has a policy, a procedure and an application form for this purpose. It states that recruitment, selection and admissions to the Diploma in Tourism and Hospitality Management is undertaken according to OTHM's policy. The College is aware of the entry requirements of the awarding organisation for the Diploma as expressed in the Programme Specification and on the OTHM website. OTHM sets requirements for the standard of English required of students and allows relevant work experience to be taken into account in admitting students to its programmes.
- 2.7 The College's policy, procedure and application form together with OTHM's requirements for admission are suitably and sufficiently clearly stated to meet the Expectation.
- 2.8 The review team considered the College's and OTHM's entry requirements, looked at student files, sought clarification in meetings with staff and asked students directly about their experience of the College's recruitment and admissions procedures and requirements.
- 2.9 The College's website is used for marketing and recruitment purposes and although an application form can be accessed online through the website it cannot be downloaded as claimed. The website provides details of the admissions process, although it assumes that students are subject to UK Visas and Immigration Tier 4 arrangements, whereas the College is not an approved sponsor of Tier 4 students and cannot therefore recruit from outside the EU. The College's prospectus is not available on the website. Some students stated that they came to know about the College through 'word of mouth' rather than using the website and completed the application form following an initial contact with the College.
- 2.10 Examination of student files by the review team showed that some students were admitted to the Level 5 Diploma in Tourism and Hospitality Management apparently without satisfying the admissions criteria required by OTHM. For entry to the Level 5 Diploma the OTHM requires a Level 4 qualification and/or relevant work experience, while student files showed that some students had been admitted to the Diploma without either a Level 4 qualification or appropriate and relevant work experience. The review team also found that English language requirements had not been met in some cases.
- 2.11 The College claims that it uses meticulous pre-arrival procedures to ensure that all students are admitted to a programme to which they are suited. Examination of student files showed little evidence that the admission to the Diploma had been carried out in a thorough and consistent way. Interview notes were in some cases absent and, when present, were minimal, omitting to record essential information relating to questions asked and responses given. Students' claims to have prior work experience were scant and sometimes clearly showed that they did not have relevant work experience to offset the lack of a Level 4 entry qualification.

2.12 The College's failure to admit students according to its stated policy and to the admissions criteria of OTHM constitute a breach of its own quality assurance procedures. The review team **recommends** that the College ensure that OTHM's entry requirements and the College's admissions policy and procedures are followed. Expectation B2 is not met and the level of associated risk is serious.

Expectation: Not met Level of risk: Serious

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

Quality Code, Chapter B3: Learning and Teaching

- 2.13 The College states that it provides outstanding and inspirational teaching and enables students to develop as independent learners. The Tutor Handbook states that teaching staff undergo both observation of teaching and staff appraisal. The Quality Assurance handbook identifies key monitoring tools, including use of data to benchmark student achievement, which the College states that it monitors on a regular basis.
- 2.14 There is a policy for observation of teaching and a form for recording teaching observations. Teaching staff are required to produce schemes of work and session plans and are provided with templates for these. It is the responsibility of the Academic Coordinator to check on the adequacy of schemes of work and session plans produced by the teaching staff.
- 2.15 There is a Staff Development and Training Policy whose stated objective is to enable staff to acquire the knowledge and skills to enable them to perform effectively in their current roles.
- 2.16 Student feedback on their teaching and learning experience is obtained formally through mid-course and end-course evaluations and informally through meetings with the Academic Co-ordinator.
- 2.17 Students are provided with learning materials in paper form during teaching sessions. The College has developed a virtual learning environment (VLE) which provides students with information about their programme as well as learning materials such as lecture notes and slide show presentations.
- 2.18 The Expectation is met through the provision of a range of learning opportunities to students and monitoring of the teaching that takes place.
- 2.19 The review team examined documents provided by the College, held meetings with a range of staff and with students in order to follow up lines of enquiry for which greater clarification and enquiry was required, and had access to the VLE in order to inform discussion with staff and students about its use and areas for further development.
- 2.20 Students confirmed that they find staff responsive to their learning requirements and that taught classes are helpful. While a more systematic and formal approach to learning support may be desirable should the College meet its aspiration of a substantial increase in student numbers, the small number of students currently studying at the College enables an informal approach to be effective. Although further development of the VLE, especially in respect of industry-related material and links, would help to enhance students' learning experience, students find the VLE to be easy to access from outside the College and confirmed that it provides suitable learning support for material covered during the teaching sessions.

- 2.21 The College's formal mechanisms for systematically reviewing and enhancing the provision of learning opportunities and teaching are not fully operational nor, in places, sufficiently implemented to provide the College with oversight or to enable it to identify opportunities for enhancement. Although observation of teaching takes place the record of observations does not provide enough information to the teacher on areas of strength and areas for further development. While there is evidence that observation of teaching is considered at the programme committee, such consideration is not informed by a formal report of teaching observations. The College accordingly does not have sufficient oversight of strengths and areas for development of its teaching provision. The staff appraisal and staff development policies have not been sufficiently implemented to allow the College to review and enhance teaching and learning for students. While schemes of work and session plans written by the teaching staff have been produced according to the College's template, the examples considered by the review team offered only scant information about teaching planned for the different units of the programme. The review team **recommends** that the College further develop and implement approaches which enable students to develop as independent learners.
- 2.22 The review team notes that the College has not taken up opportunities offered by OTHM for the development of its teaching staff and considers this as a contributory factor to the recommendation in Expectation A3.4 in respect of staff awareness of OTHM's requirements and procedures.
- 2.23 The process for gaining feedback from students on their teaching and learning experience operates at an informal level. Although further development of formalised processes for gathering student views would enable the College to gain informed oversight through the production of regular reports for consideration at its deliberative committees, the present arrangements are satisfactory and are found by students to be helpful.
- 2.24 The combination of informal mechanisms and partial implementation of policies and the use of templates enables the College to review and enhance its teaching and learning for students, but there is an insufficient emphasis in the College's planning on assuring the quality of the provision of learning opportunities and a lack of sufficient rigour in the application of quality assurance procedures to support teaching staff. Expectation B3 is met and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

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

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

- 2.25 The College supports students' development in a number of ways. The Academic Co-ordinator is responsible for ensuring the quality of students' learning experience and that they make suitable progress in their studies. The Principal is also available to meet students to discuss their academic development. The Student Welfare Officer supports students with personal matters to enable students to achieve in their studies. Students are offered induction sessions at the commencement of their studies. The College's system of individual learning plans is intended to enable monitoring of and support for students in their academic and professional development. Further support for students' individual academic, personal and professional development often takes place through informal discussion or engagement with staff.
- 2.26 To supplement teaching materials, students receive a Student Handbook, the programme specification and unit guides.
- 2.27 The College provides resources to support student learning through its VLE and library, which is equipped with computer facilities. Students are encouraged also to use the services of the local public library and of the British Library which they are entitled to join.
- 2.28 The variety of ways in which students are supported both academically and pastorally by the staff of the College enables the Expectation to be met.
- 2.29 The review team reviewed a range of documentation provided by the College, including the Student Handbook, programme specification, unit guides, completed individual learning plans, and feedback from students. The team also held meetings with staff and students to discuss the support provided by the College for its students.
- 2.30 Students find the Student Welfare Officer to be responsive to personal matters that may affect their study from time to time. However, it was unclear at the time of the visit what role, if any, the Student Welfare Officer played in offering students careers and professional career advice, and advice about progression to university upon successful completion of their studies. Students also drew attention to the responsive and helpful support offered by the Principal and other members of staff when approached on an informal basis. However, individual learning plans do no more than record student achievement and do not provide an effective and formal means of monitoring student academic and professional development at different points in their programme of study. While the largely informal approach of the College to monitoring and supporting students with their academic, personal and professional development may benefit from greater formalisation if the College fulfils its plans to expand its student body, it is effective in meeting the needs of the present student body.
- 2.31 There is no evidence of opportunities for professional development of students. Inspection of the curriculum vitae of the teaching staff failed to reveal a strong background of experience of the tourism and hospitality industry. Students are offered little exposure to the industry either through, for example, guest lectures, field visits or opportunities for work placements. The review team **recommends** that the College provide students with opportunities to develop professional knowledge and practical understanding of the tourism

and hospitality sector and also **recommends** that the College provide support for staff to gain professional experience of the tourism and hospitality sector.

- 2.32 The VLE provides students with programme and unit information, and lecture notes are regularly uploaded. While it may be beneficial to make wider use of the VLE to provide, for example, industry links and professional information relevant to pursuing a career in the industry, students confirmed that the VLE, and learning resources generally, are adequate to their study needs.
- 2.33 The College's systems for supporting a small student body are generally effective. However the lack of opportunities for sector-based professional development for students indicates insufficient emphasis given to assuring quality in the College's planning. Expectation B4 is met and the level of associated risk is moderate.

Expectation: Met

Level of risk: Moderate

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

Quality Code, Chapter B5: Student Engagement

Findings

- 2.34 Although the College has not produced a formal policy or a systematic approach to engaging students as partners in the enhancement of their learning experience, the Academic Co-ordinator acts as a key point of contact between students and the College. A student representative elected by the students of the College has attended a meeting of the Programme Board and meets the Principal informally on a monthly basis. The College uses a short student survey to obtain feedback from students and relies on informal feedback to engage students in their educational experience.
- 2.35 The Expectation is met since there is evidence of student engagement operating at the College both formally and informally.
- 2.36 The review team considered evidence supplied in College documentation including minutes of meetings and student feedback questionnaires, and held meetings with staff and students.
- 2.37 The College's informal approach to student engagement and the use of its student questionnaire demonstrate that the College is responsive to matters raised by students which may enhance their learning experience when addressed. The absence of a formal system for and a consistent approach to student membership of College committees make it difficult to clearly identify instances of student engagement enhancing the learning experience. The review team found confusing evidence in respect of the committees whose composition includes student representation. For example, while minutes of a meeting of the Programme Board showed that the student representative was present, College staff stated that the student representative was a member only of the management group. Similarly, students themselves seemed unclear about which committees, if any, the student representative was a member of. The College's approach to student engagement is informal and unsystematic: the review team **recommends** that the College develop and implement formal systems to promote the engagement of students in the assurance and enhancement of their educational experience.
- 2.38 The review team found no evidence to support the College's claim that students play a valuable role during periodic validation and periodic review events, nor the claim that students engage with external verifiers from OTHM.
- 2.39 The College operates an approach to student engagement which, while informal and unsystematic, is responsive to the needs of a small student body and a small number of staff. Nevertheless the lack of an approach to student engagement which is formalised and systematic carries the risk of an insufficiently rigorous oversight of student views and is indicative of a weakness in the College's governance structure and of procedures with shortcomings in the rigour with which they are applied. Expectation B5 is met and the associated level of risk is moderate.

Expectation: Met

Level of risk: Moderate

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

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

- 2.40 The arrangements for the assessment of students, including the respective responsibilities of the OTHM and of the College, are as described in Expectation A3.2. The College's documentation provided little information about assessment processes and how its students are supported to achieve the intended learning outcomes set by the awarding organisation. The College provided a range of documentation related to its assessment practices, including its Tutor Handbook, the Student Handbook and its Internal Verification Policy, but this evidence lacks clarity, detail and relevance. The documents refer to non-existent management posts and committees; include reference to examinations which are not used as an assessment method; omit policies required by the awarding organisation, such as those for the recognition of prior learning; and fail to describe accurately the responsibilities of teaching staff in respect of designing and marking summative assessments.
- 2.41 The review team concludes that the College's assessment policies and practices are not explicit, nor are they communicated accurately, consistently and effectively to teaching staff and students and therefore the Expectation is not met. These shortcomings contribute to the recommendation in Expectation A3.2 in respect of processes for assessment.
- 2.42 The review team tested the operation of assessment processes by considering documents produced by the College, including Policies and Procedures for Internal Assessment and Moderation/Verification, handbooks for tutors and students, teaching and assessment plans, a sample of feedback to a student on a draft submission; and by meeting managers, teaching staff and students.
- 2.43 Although the College is required by OTHM to have a policy in respect of recognition of prior learning (RPL), the information available to prospective or current students makes no reference to the possibility of RPL. The review team found that students who had qualifications that might have formed the basis of a successful application for RPL were unaware of the possibility.
- 2.44 The College prepares an academic calendar which sets out the relevant dates for teaching, preparation and submission of draft assessments, feedback by tutors, final submission, internal and external verification. Students confirmed that they have the opportunity to submit a draft of their assignment for formative feedback before final assessment. The College provided a sample of formative feedback intended for an unnamed student: the review team found that the tutor's comments provided useful feedback on structure, referencing and, to a lesser extent, content, but did not address poor use of English. The College's Policies and Procedures for Internal Assessment and Moderation/ Verification states that an individualised learning plan (ILP) should be used to support students to overcome any weaknesses. Students were unaware of ILPs and the College was unable to provide evidence of a completed ILP as set out in the policy. As part of the assessment of final submissions assessors complete a feedback sheet, which records whether the assessment criteria have been achieved. Although this offers an opportunity to

provide individualised feedback identifying strengths and weaknesses, the review team failed to find evidence of this opportunity being taken up by teaching staff in the feedback given to students.

- 2.45 The review team found no evidence of any review of assessment processes and practices undertaken by the College to enhance its provision. Although students are invited to complete feedback questionnaires at the end of each unit, the questionnaire format does not offer an opportunity to comment on the assessment process.
- 2.46 The College's failures to articulate its assessment processes for staff and students, to implement fully the requirements of the awarding organisation and its own policies, and to provide effective feedback to students, constitute significant gaps in its policy and procedures relating to quality assurance and demonstrate ineffective operation of parts of its governance structure. These shortcomings contribute to the recommendation in Expectation A3.2 in respect of processes for assessment. Expectation B6 is not met and the associated level of risk is serious.

Expectation: Not met Level of risk: Serious

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

Quality Code, Chapter B7: External Examining

Findings

- 2.47 In March 2015 OTHM introduced new arrangements for assessment of its revised qualifications. Under the new arrangements, delivery centres are responsible for first marking and internal verification of students' assessed work, while OTHM carries out external verification either through visits to centres by standards verifiers or remotely, and is responsible for the selection, appointment, training and deployment of its standards verifiers. The College's managers informed the review team that they anticipated that external verification would take place in February 2016 after the completion of delivery of the current programme. Consequently the College had not received a standards verifier's report at the time of the review visit.
- 2.48 These processes allow the Expectation to be met.
- 2.49 The review team tested the Expectation by talking to staff and students and considering documentation provided by the College. The Student Handbook makes no reference to external verification of assessment. Students who met the team had had no contact with any representative of the awarding organisation. Staff were generally aware of the new assessment processes and the timing of external verification, although it was not yet clear whether this would take place by way of a visit or remotely. The College's quality assurance documentation makes reference to reports from external bodies, but does not incorporate policy and procedures for receiving and responding to external verifier reports. The team therefore **recommends** that the College establish and implement formal policy and procedures for responding to reports from external verifiers.
- 2.50 While acknowledging that the College has yet to undergo external verification, the absence of formal documented procedures for responding to external verifier reports indicates a lack of clarity about responsibilities for quality assurance and that insufficient emphasis has been given to assuring standards in the College's planning processes. Expectation B7 is met and the level of associated risk is moderate.

Expectation: Met

Level of risk: Moderate

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

Quality Code, Chapter B8: Programme Monitoring and Review

Findings

- 2.51 Although the College states that it monitors and reviews the programmes it offers it did not identify a definitive set of internal procedures which it applies to monitoring and review. During the course of the review the College provided the review team with a range of documentation including its Quality Assurance Handbook, Standardisation Strategy Policy, Quality Assurance Framework, Tutor Handbook which refers to the College's internal quality assurance procedures, a procedure for internal programme review entitled Internal Process Related To Offering A New Programme, and its Quality Improvement Policy, which was supplied in response to a request for a quality improvement plan. While noting this range of documentation contains elements in common it does not amount to a coherent set of policies and procedures.
- 2.52 The review team concludes that the College does not meet the Expectation as it does not have a definitive set of procedures for the monitoring and review of programmes. The review team therefore **recommends** that the College establish and implement formal policy and procedures for the monitoring and review of programmes.
- 2.53 The College has implemented some components of the various policies it made available to the review team. For example, teaching staff have been observed in accordance with the College's Observation of Teaching and Learning Handbook; and students complete end of semester surveys. The Programme Team meets on a monthly basis; however, there are no terms of reference, its agendas are short, minutes are brief, and there is no evidence that agreed actions are followed up at subsequent meetings. Although in January 2015 the programme leader reported that a course review report had been prepared for OTHM, and the College provided the review team with an Annual Report 2013-14, this document covers the overall operation of the College as a whole and provides minimal content relating to the two OTHM programmes delivered by the College during this period. Several of the policies presented by the College refer to the preparation of a quality improvement plan but, despite repeated requests, the College was unable to supply a copy of such a document.
- 2.54 The College's failure to define its processes for the monitoring and review of programmes, the selective implementation of aspects of its Quality Assurance Framework and ineffective monitoring by its committees constitute significant gaps in procedures relating to quality assurance and demonstrate breaches of its own quality assurance management procedures. Expectation B8 is not met and the associated level of risk is serious.

Expectation: Not met Level of risk: Serious

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

Quality Code, Chapter B9: Academic Appeals and Student Complaints

- 2.55 The College has separate procedures for dealing with assessment appeals, and student complaints and grievances.
- 2.56 The complaints policy and procedure has been designed for use by students and is made available in the Student Handbook. The complaints procedure follows a four-stage process with the first stage being informal and subsequent stages formal. Ultimately the Principal makes a final decision over a complaint should it reach the fourth stage.
- 2.57 The procedure for dealing with assessment appeals reflects the responsibilities that OTHM has devolved to its approved centres. An assessment appeal is dealt with through a panel chaired by the Principal and consisting of two other members of staff. The academic appeal procedure provides three grounds upon which an academic appeal would be considered.
- 2.58 The College's policy and procedures for complaints and academic appeals enable the Expectation to be met.
- 2.59 The review team looked at the Student Handbook, the College's website and VLE and discussed both sets of policies and procedures with staff and students to test how well both these policies and procedures were understood, implemented and operated.
- 2.60 The complaints procedure is understood by staff and students but has not been used since no formal complaints have been made to date. Given the small number of students at the College and the responsiveness of staff to issues raised by students, the review team found the informal approach to be effective. The complaints procedure is open only to students and not to any other stakeholders, and is not available on the College's website nor on its VLE.
- 2.61 Staff and students demonstrated an awareness of the procedure for dealing with appeals against outcomes of assessment. The College offers the support of the Student Welfare Officer should a student wish to make an appeal, although to date no student has done so. The appeals procedure does not make clear who is responsible for determining whether an appeal meets one or more of the three criteria under which an appeal would be considered by the panel. It is also not clear from the procedure whether a student who is not satisfied with the outcome of the College's procedures may have recourse to the procedures of OTHM as the awarding organisation. Noting the potential for students to be unaware of procedural avenues available to them, the review team **recommends** that the College should ensure that it refers students to information about the appeals procedure of the awarding organisation. Although the academic appeals procedure is available to students in the Student Handbook, it is not more widely available, for example through the College's website.
- 2.62 The College has in place appropriate policies and procedures for dealing with academic appeals and complaints and has made these procedures available to students. Expectation B9 is met. The lack of reference to the appeals procedure of the awarding organisation is indicative of a lack of clarity about the College's responsibilities and

constitutes a shortcoming in the rigour with which the College's procedure is applied. The level of associated risk is moderate.

Expectation: Met

Level of risk: Moderate

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

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

2.63 The College has no arrangements for delivering learning opportunities with other organisations.

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

Quality Code, Chapter B11: Research Degrees

Findings

2.64 The College does not offer research degrees.

The quality of student learning opportunities: Summary of findings

- 2.65 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. Four of the nine applicable Expectations for this judgement area have not been met, and the level of risk is judged to be serious for each of these Expectations. The remaining five Expectations are met but have a moderate level of risk.
- 2.66 The College has major gaps in several applicable Expectations, including, but not limited to, the lack of formal procedures for the approval of new programmes, for the monitoring and review of existing programmes, and for responding to external verifiers' reports, as well as failings in the application of admissions policy and procedures.
- 2.67 There are no findings of good practice and no affirmations relating to this judgement area.
- The review team makes nine recommendations relating to this judgement area. 2.68 The first relates to procedures for the development and approval of new programmes. The second follows from the failure to follow the policy and procedures in respect of the admission of students to programmes. The third relates to approaches to learning which allow the development of students as independent learners. The fourth and the fifth concern the desirability of offering students a greater level of professional experience in their sector. The sixth relates to the development of formal systems for student engagement. The seventh follows from the lack of formal policy and procedure to respond to reports from external verifiers. The eighth recommendation concerns the lack of policy and procedures for the monitoring and review of programmes. The final recommendation relates to the lack of information about the awarding organisation's procedures for academic appeals. Additionally, the recommendation in Expectation A3.4 in relation to the awareness on the part of teaching staff of OTHM's requirements and procedures for the award of credit, and the recommendation in Expectation A3.2 in respect of processes for the assessment of students are also relevant to this judgement area.
- 2.69 These recommendations collectively relate to significant gaps in the College's policies and procedures in relation to its arrangements for quality assurance, and demonstrate ineffective operation of parts of its governance structure and breaches of its own quality assurance procedures.
- 2.70 On the basis of the documentation provided and meetings with staff and students, the review team concludes that the quality of student learning opportunities at the London Training Academy **does not meet** UK Expectations.

3 Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

- 3.1 The College provides information for external audiences, including prospective students, through its website and prospectus. Current students may find information about the College and its provision through the Student Handbook and the Programme Specification. Further information and learning support materials are provided on the College's VLE. The Staff Handbook provides information about the College and its operation as well as information relating to the College's expectations in respect of lesson plans, schemes of work and teaching observation.
- 3.2 The review team found that this Expectation is not met because the College does not have a policy and procedure for managing its public information. The review team **recommends** that the College should develop and implement formal policies and procedures to ensure that information about higher education provision is fit for purpose and trustworthy.
- 3.3 In considering the information offered about its higher education provision, the review team examined the College's website, the Student Handbook, programme specification, unit information and material available on the VLE, and held meetings with staff and students.
- 3.4 The review team found some shortcomings in the provision and management of public information. Although the Business Development Manager has responsibility for ensuring that the prospectus and website are reviewed on a quarterly basis and the Principal is responsible for signing off the website and any changes made to it, the review team failed to find evidence that the College fulfilled these procedures, and concludes that procedures operate only on an informal basis. The College's website offers some incorrect information about the College's programmes: it describes five of the seven diploma programmes listed on the website as being offered with work placements whereas OTHM no longer offers such awards and, indeed, the College does not offer such programmes either. Information about progression to degree-level study at universities in the UK is misleading in that it leads students to expect progression to the third year of an honours degree upon successful completion of the Diploma to be straightforward. Other parts of the website were not operational: for example, it was not possible to download the prospectus and application form, although there is an online application form available through the website; programme specifications were not available.
- 3.5 Students find the Student Handbook and programme specification to be valuable and useful. The programme specification is provided by OTHM; the Student Handbook is produced by the College. However, there is no formal process to seek feedback from students about the information provided and further information that might usefully be included in future.
- 3.6 The College does not have an effective policy for managing its public information. Its website contains material which is inaccurate and misleading. The lack of an effective

policy for ensuring the accuracy and fitness for the purpose of public information is indicative of a significant gap in policy and procedure relating to quality assurance. Expectation C is not met and the level of associated risk is serious.

Expectation: Not met Level of risk: Serious

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

- 3.7 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation for this judgement area is not met and the associated level of risk is serious.
- 3.8 The College does not have an effective policy for managing its public information. Its website contains material which is misleading and inaccurate. Without remedial action, these failings could lead to serious problems over time with the management of this area.
- 3.9 There are no findings of good practice or affirmations relating to this judgement area.
- 3.10 The single recommendation in this judgement area relates to the development of policy and procedures to ensure that information is fit for purpose and trustworthy, and is indicative of a lack of clarity about responsibilities in the College's governance structure.
- 3.11 The review team therefore concludes that the quality of the information produced about the College's learning opportunities **requires improvement** to meet UK Expectations.

4 Judgement: The enhancement of student learning opportunities

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

Findings

- 4.1 The College provided a diagrammatic representation of its Quality Assurance Strategy/Framework and a commentary on its approach to quality assurance and enhancement. The commentary makes reference to a number of College policies and documents, including the Quality Assurance Handbook, Quality Assurance Policy (actually entitled the Standardisation Strategy Policy) and Staff Training and Development Policy. The Quality Assurance Policy incorporates various references to continuous improvement through measurement against identified quality standards and performance indicators, regular self-evaluation and action planning. It contains some broad statements of principle and practice and as such provides a useful starting point for the development of a planned and systematic approach to enhancement. On this basis, the team concludes that the College meets the Expectation.
- The review team explored how effectively the College implemented its approach to enhancement by reviewing relevant policies and procedures, reading minutes of meetings and other documents and in meetings with management, teaching staff and students. The Principal informed the team that the College's approach to enhancing its provision was to visit established organisations to obtain ideas for making improvements to its provision. He explained that as the College was small and in the early stages of its development, it had not been possible to implement fully all aspects of the Quality Assurance Framework. The review team notes that the College had implemented a teaching observation scheme; and staff confirmed that they had received feedback which they had acted upon. The College formally conducts a survey of students' views at the end of each unit and both staff and students spoke positively about the frequency with which informal feedback is sought and received. The College identified a number of examples of improvements made in response to students' wishes, including the provision of refreshment facilities, improving the accessibility of the library, and changes to the timetable. Set against these individual improvements is a number of factors identified elsewhere that act against the establishment of a systematic approach to improving the quality of learning opportunities. These are: the limited awareness of external reference points such as the Quality Code; the failure to engage systematically with OTHM; the absence of evidence of any internal staff development; the failure to systematically identify and record action points via a quality improvement plan; limited discussion of opportunities for enhancement at team meetings; and the embryonic nature of student representation.
- 4.3 The review team concludes that the College's approach to enhancement is unsystematic and informal. While it has the basis for an enhancement strategy in its Quality Assurance Policy, its failure to translate this into institutional policies and procedures which are appropriate to its size, its stage of development and its ambitions for its future constitute shortcomings in terms of the rigour with which its procedures are applied and demonstrate ineffective operation of its governance structure. The review team **recommends** that the College develop and implement a strategic approach to the enhancement of student learning opportunities. The Expectation is not met and the associated level of risk is moderate.

Expectation: Not met Level of risk: Moderate

The enhancement of student learning opportunities: Summary of findings

- 4.4 In reaching its judgement, the review team matched its findings against the criteria specified in Annex 2 of the published handbook. The single Expectation in this judgement area is not met, with an associated level of risk which is moderate.
- 4.5 There are no findings of good practice or affirmations relating to this judgement area.
- 4.6 The College's approach to the enhancement of its provision is unsystematic and informal. Although it identified a number of examples of improvements, its failure to form an effective enhancement strategy at institutional level led to the single recommendation that it should develop and implement a strategic approach to the enhancement of student learning opportunities. This recommendation is indicative of shortcomings in the rigour with which its procedures are applied and demonstrate ineffective operation of its governance structure.
- 4.7 The review team therefore concludes that the enhancement of student learning opportunities **requires improvement** to meet UK expectations.

5 Commentary on the Theme: Student Involvement in Quality Assurance and Enhancement

- Although the College has not produced a formal policy or a systematic approach to engaging students as partners in the enhancement of their learning experience, the small number of students currently studying at the College has enabled its informal approach to student engagement to operate satisfactorily. The approachability of staff, including senior managers, and the use of its student questionnaire demonstrate that the College is responsive to matters raised by students. The absence of a formal system for, and of a consistent approach to, student membership of College committees makes it difficult to identify clearly instances of student engagement that enhance the learning experience and the review team found confusing evidence in respect of the committees whose composition includes student representation.
- 5.2 The review team found no evidence to support the College's claim that students play a valuable role during periodic validation and periodic review events nor the claim that students engage with the external verifiers from OTHM.

Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 25-27 of the <u>Higher Education Review (Plus) handbook</u>

If you require formal definitions of other terms please refer to the section on assuring standards and quality: www.gaa.ac.uk/assuring-standards-and-quality

User-friendly explanations of a wide range of terms can be found in the longer **Glossary** on the QAA website: www.gaa.ac.uk/Pages/GlossaryEN.aspx

Academic standards

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

Award

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

Blended learning

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

Credit(s)

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

Degree-awarding body

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

Distance learning

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

Dual award or double award

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

e-learning

See technology enhanced or enabled learning

Enhancement

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

Expectations

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

Flexible and distributed learning

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

See also distance learning.

Framework

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

Framework for higher education qualifications

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

Good practice

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

Learning opportunities

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

Learning outcomes

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

Multiple awards

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

Operational definition

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

Programme (of study)

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

Programme specifications

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

Public information

Information that is freely available to the public (sometimes referred to as being 'in the public domain').

Quality Code

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

Reference points

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

Subject Benchmark Statement

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

Technology enhanced or enabled learning (or e-learning)

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

Threshold academic standard

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

Virtual learning environment (VLE)

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

Widening participation

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

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