

## QAA Reviews of Alternative Providers Key Findings 2013-15

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### Foreword

Alternative providers are an important part of the UK higher education landscape, operating predominantly in England, with the greatest concentration being in London. As independent colleges and universities, they operate either for profit or have charitable status and do not receive direct recurrent grant funding from any of the funding councils.

Often offering highly specialised programmes, alternative providers contribute to the diverse opportunities on offer in UK higher education, increasing students' choice of where, what, and how to study.

The government is pursuing reforms to ease entry into the market for new providers, giving them the chance to progress towards becoming degree-awarding institutions as appropriate. In the last three years, we have seen four alternative providers granted degree awarding powers by the Privy Council, three receiving university title, and two university college title.<sup>1</sup>

The Quality Assurance Agency for Higher Education (QAA) is the UK's expert body on assessment for Degree Awarding Powers, and we have recently published our view on how to reform the system in a way that supports entry and protects the overall reputation of UK higher education.

Since 2012 we have conducted quality reviews of alternative providers on behalf of the Department for Business, Innovation and Skills (this function has now moved to the Department for Education), for providers who wish to have their higher education courses specifically designated for student support purposes, and the Home Office, for providers seeking Tier 4 Highly Trusted Sponsor status from UK Visas and Immigration to enable them to recruit international students. We take very seriously our responsibility for ensuring that UK expectations for standards, quality and published information are met.

Our rigorous review methods set a high bar for quality assurance purposes, having been strengthened over time, which means not all providers pass muster. Of the 459 alternative providers that have applied for QAA review since in 2012, only 221 remain under our scrutiny. Two hundred and thirty-eight (52 per cent) have either withdrawn prior to review, stopped providing higher education, have merged or closed due to market conditions or have had negative outcomes. During the period covered by this report (academic years 2013-15), seven providers left the system after failing to meet expectations.

The 19 providers that met all expectations in 2013-15 demonstrate that alternative providers can offer quality education, and student choice. With two of them being commended, they also make a contribution to enhancement of the higher education sector as a whole.

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Douglas Blackstock Chief Executive QAA

<sup>1</sup> Resource Development International Ltd (RDI), University Campus Suffolk (UCS), Anglo-European College of Chiropractic and the British School of Osteopathy have all achieved Taught Degree Awarding Powers since the start of 2014. BPP University College (now BPP University), RDI (now Arden University) and UCS (from 1 August: University of Suffolk) have all achieved University title in this period. Note: UCS is has recently been awarded direct funding by HEFCE, so is no longer classed as an 'alternative provider'. Two further providers have achieved University College title/status: ifs University College (now London Institute of Banking and Finance) and University College of Estate Management.

### Executive summary

This report summarises the findings of higher education reviews of alternative providers conducted by QAA over the academic years 2013-15. Alternative providers are independent colleges and universities that offer UK higher education. This report covers 27 reviews of 23 providers: eight seeking designation for public funding purposes and 15 seeking Highly Trusted Sponsor status from the Home Office in order to recruit international students.

The reviews encompass provision that includes a broad range of curricula, a diversity of providers, and a range of awards that students may achieve. Subjects taught by providers include business and management, fashion, dance, theology, needlework and football management. The majority of the providers reviewed during this period (19) are based in the London area: 12 are clustered within a one-mile radius of central London.

The 23 providers reviewed range from the new – such as UCFB College of Football Business Ltd and Tertiary Education Services Ltd trading as New College of the Humanities – alongside more established providers such as the Royal School of Needlework (founded in 1827) and Moorlands College, which has been training Christian missionaries since 1948.

Around 70 per cent of reviews had positive outcomes (19 of the 27 reviews, 16 of the 23 providers). Good practice identified by review teams included responsiveness to students and the student voice, provision of programmes in niche and specialist areas that prepare students for industry or professional practice, and improvement of students' learning through positive engagement with QAA and the UK Quality Code for Higher Education.

Two providers received commendations: the Royal School of Needlework and London School of Business and Management Ltd (LSBM).

Alternative providers that are performing well tend to be ones that have been longer established, with a distinct mission and clear rationale for their education. They generally offer programmes that lead to an award from a university and enrol a sustainable volume of higher education students.

Two providers that were initially judged to 'require improvement' took remedial action, with the result that QAA was subsequently able to amend these review judgements to 'meets UK expectations'.

Eight reviews (of seven providers) had unsatisfactory outcomes. These were primarily recently established providers with very few students, operating without the support of a university partner. The reviews of LSBM and New College of the Humanities, however, indicate that newly established alternative providers can deliver an excellent student experience.

At two providers, QAA worked with Pearson, via QAA's Concerns Scheme, to address concerns about student registration.

The consequences of failing a QAA review may include withdrawal of specific course designation and/or loss of a government licence to sponsor international students to study in the UK.

# About alternative providers and QAA review

Alternative providers are independent colleges and universities that offer UK higher education. Some of these have degree awarding powers, or university/university college title, in which case they are mandatory subscribers to QAA and subject to the same review requirements as publicly funded higher education providers.

However, the majority of alternative providers are not degree awarding bodies and are subject to different review requirements, currently under a review method known as Higher Education Review (Alternative Providers).<sup>2</sup>

QAA offers Higher Education Review (Alternative Providers) to satisfy two main eligibility requirements for alternative providers:

- to have their higher education courses designated by the Department for Business, Innovation and Skills for public (student loans) funding
- to apply for or retain Highly Trusted Sponsor status from the Home Office, an essential requirement for providers wanting to recruit international students via a Tier 4 licence.

In both cases, the government departments involved require providers to have achieved a successful outcome before they are considered for public funding and/or Highly Trusted Sponsor status.

We work closely with the government and awarding bodies to deliver a regulatory regime for alternative providers that protects the student and taxpayer interest. Government policy is to promote and grow good provision while safeguarding against poor quality.<sup>3</sup> Most alternative providers offer higher education that leads to qualifications or academic credit of degree-awarding bodies and/or of Ofqual-regulated awarding organisations. In support of this goal, Higher Education Review (Alternative Providers) assesses quality and standards at the providers reviewed.

Further information about Higher Education Review, QAA and the UK Quality Code for Higher Education (Quality Code) is available in Appendix 1.

<sup>2</sup> www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education

<sup>3 &</sup>lt;u>www.gov.uk/government/uploads/system/uploads/attachment\_data/file/450090/BIS-15-440-guidance-for-alternative-higher-education-providers.pdf</u>

### Providers reviewed

QAA undertook 27 reviews of alternative providers in 2013-14 and 2014-15, relating to 23 providers. Four providers were reviewed again because they met a risk indicator at annual monitoring or review.

Medipathways Ltd was re-reviewed because it received an unsatisfactory judgement in its first review. The Centre for Homeopathic Education and CCP Graduate School Ltd had partial re-reviews following unsatisfactory judgements in their first reviews. UCFB College of Football Business Ltd was re-reviewed because it met a risk indicator (a significant increase in student numbers).

#### UCFB College of Football Business Ltd

UCFB College of Football Business Ltd offers courses in football and the sports industries. In 2014 the College opened a second campus at Wembley Stadium. This expansion meant it required a second QAA review.

Our second review of UCFB found that, overall, they had managed their growth well. The review team identified five features of good practice that included flexible support for students and UCFB's timely response to informal complaints.

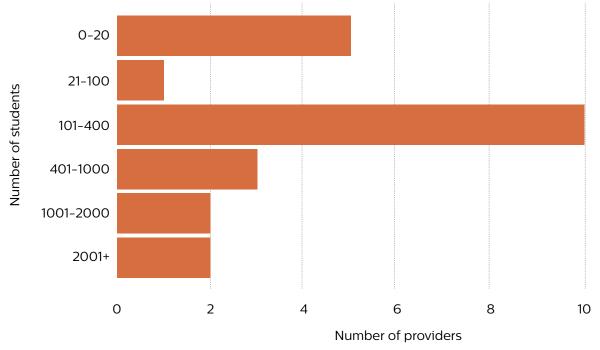
Given that UCFB has further expansion in mind and plans to introduce postgraduate courses, the review team recommended that UCFB develops and applies formal policies and procedures where there are currently informal arrangements. For example, it would be expected to systematically review courses and programmes.

The second review found that UCFB did well in many other areas. Visiting professionals and guest speakers contribute valuable expertise, and this is being extended into new programmes. Many staff also have extensive and effective links with employers.

The 27 reviews encompassed a broad range of vocational curricula, a diversity of providers, and a variety of different course awards including HNDs, diplomas and degrees. Around three quarters of the 23 providers offer niche or specialist education.

Numbers of higher education students at the providers we reviewed in this period ranged from three research students (The Prince's Foundation for Building Community) to 3,662 (British Institute of Technology Ltd). One provider, Luton International College Ltd, had no students at the time of review. For Luton, this was seen as a temporary situation: it has aspirations to recruit overseas students to the programme. The total number of students enrolled at the 23 providers was 13,150, and the mean number per provider was 571. Five providers had fewer than 20 students at the time of their review.

#### Chart 1: Providers by number of students



While around half of the providers we reviewed were set up after 2002, many are long-established institutions. Two were founded in the nineteenth century: ifs University College and the Royal School of Needlework.

Just under half of the institutions reviewed are clustered within a one-mile radius of central London.

Alternative providers further afield include Luton International College Ltd, Moorlands College in Hampshire and the Royal School of Needlework in Surrey.

#### Alternative providers and awarding bodies

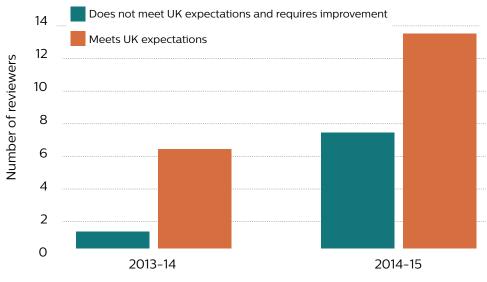
Apart from ifs University College, which obtained its own taught degree awarding powers in 2010, the alternative providers we reviewed in this period offer courses validated by a UK degree-awarding body or other awarding organisation. University awarding bodies include Bournemouth University, Buckinghamshire New University, Middlesex University, Southampton Solent University, Trinity College Dublin, University for the Creative Arts; University of East London, University of Gloucestershire, University of South Wales and University of the West of England.

Eight of the providers we reviewed offer higher education leading exclusively to qualifications of other awarding organisations. These organisations include Pearson (for Higher Nationals), Gateway Qualifications, Awards for Training and Higher Education, the Chartered Institute of Marketing, the Chartered Institute of Management Accountants, the Association of Chartered Certified Accountants, and the Organisation for Tourism and Hospitality Management.

### Overview of the findings

Nearly three quarters (19) of the reviews undertaken resulted in positive outcomes. Two providers received commendations: the Royal School of Needlework for the quality of learning opportunities and London School of Business and Management Ltd for enhancement. Seven providers received one or more unsatisfactory judgements, which equates to eight unsatisfactory reviews.<sup>4</sup>







Turning to individual judgment areas:

- 85 per cent of reviews (22) reported a 'meets UK expectations' judgement for academic standards
- 80 per cent of reviews (21) reported a satisfactory judgement ('commended' or 'meets UK expectations') for learning opportunities
- 70 per cent of reviews (19) reported a satisfactory judgement ('commended' or 'meets UK expectations') for information
- 70 per cent of reviews (18) reported a satisfactory judgement ('commended' or 'meets UK expectations') for enhancement
- Just under a third of reviews (eight) reported unsatisfactory outcomes.

Overall, the review teams identified around 75 features of good practice and made 190 recommendations. The highest proportion of good practice related to the Quality Code, *Chapter B4: Enabling Student Development and Achievement*, followed by *Chapter B3: Learning and Teaching*.

#### Good practice, employability and the world of work

There is evidence that alternative providers are embracing the wider norms and expectations associated with higher education. We found examples of good practice including:

- the strong governance framework that goes beyond the requirements placed on the School by its awarding bodies and organisations (London School of Business and Management Ltd)
- the effective and well embedded pastoral support provided for students (UCFB College of Football Business Ltd)
- the use of bursaries to encourage and support student learning (Royal School of Needlework).

<sup>4</sup> Note that four providers were reviewed twice in this period.

Other examples of good practice include 'degree concept teams' and their key role in developing new programmes at Pearson College, and the clear strategy and extensive support for teaching and learning at London School of Business and Management Ltd. Staff at Condé Nast Publications Ltd act as external examiners at other providers.

Employability and engagement with the world of work are areas of particular strength for many of the providers reviewed. Only one institution, Centre for Advanced Studies Ltd trading as City of London College, was found by the review team to be not embracing employability as fully as it could have been. But elsewhere, we identified many examples of good practice.

At Condé Nast, for example, we found that 'the future employability of students is at the heart of the programmes and is embedded in the college culture.' At the Prince's Foundation for Building Community, 'the employers who met the review team all had longstanding relationships with the Foundation and spoke enthusiastically about these relationships ... based on a shared commitment to encouraging the acquisition of a variety of skills and a holistic understanding of professional practice.'

We also found examples of providers facilitating guest speakers and practitioners from industry and business, work placements, and auditions for performing arts careers.

#### Recommendations

Recommendations made by our review teams identify areas where a provider should take action to improve the student experience. Providers that achieved positive judgements in all four review areas during this period received relatively few recommendations. Those with one or more unsatisfactory judgements, on the other hand, received a greater volume of recommendations, reflecting what the review teams found to be a poor (and occasionally very poor) student experience.

Examples of recommendations include requirements for the provider to:

- embed equality and diversity, and disability policies in relevant staff and student-facing policies and materials (Medipathways)
- further develop and implement quality assurance structures and policies, clarify responsibilities, and identify clear reporting lines and actions; ensure complaints and academic appeals procedures are communicated to students (Inter-Ed, LSBM and UCFB)
- develop and implement a formal admissions policy (Centre for Homeopathic Education, LSBF, Medipathways, Urdang Schools)
- improve communications related to external examiners' reports (CCP Graduate School, Condé Nast, Moorlands College).

In the next section, we discuss in more detail the characteristics and features of providers that perform well, and those found to be unsatisfactory in one or more areas. Detailed review findings are available in Appendix 3.

### Commended providers

Two providers received commendations: the Royal School of Needlework for the quality of learning opportunities and London School of Business and Management Ltd for the enhancement of learning opportunities. Both institutions demonstrate a strategic and considered approach to higher education.

#### The Royal School of Needlework

The RSN was founded in 1827. It provides higher education courses in hand embroidery as well as short leisure courses, and certificates and diplomas in technical hand embroidery.

The RSN has offered a foundation degree since 2009 and a top-up to BA honours in Hand Embroidery for Fashion, Interiors and Textile Art since 2011. Admissions processes are rigorous, and the RSN takes deliberate steps to ensure that students enrol on the course that will best meet their needs and enable them to develop their potential. Learning opportunities include the input of visiting tutors with industry practice.

The RSN's degree-awarding body, the University for the Creative Arts, provides effective support for non-academic issues. Students are enabled to develop their skills and subject specialisms through effective academic support in class and through the tutorial system.

In a successful review overall, the RSN received a commendation for learning opportunities, in recognition of its response to the student voice and the support it offers students to ensure that they fulfil their potential during and after their course. The review team also identified four features of good practice related to this commendation, one of which is highlighted in the QAA publication *Good Practice in Higher Education Review: A Collection of Case Studies.*<sup>5</sup>

#### London School of Business and Management Ltd

Based in central London, LSBM has a partnership with Birkbeck College, whereby Birkbeck provides teaching facilities. Since its 2012 Review for Educational Oversight<sup>6</sup> LSBM has changed its higher education strategy, moving away from Higher National Diplomas towards the provision of undergraduate degrees.

LSBM's commendation recognises its strategic approach to enhancing the quality of learning opportunities. This ethos is embedded in organisational structures and processes and in initiatives such as the peer observation of teaching and the personal academic tutor system.

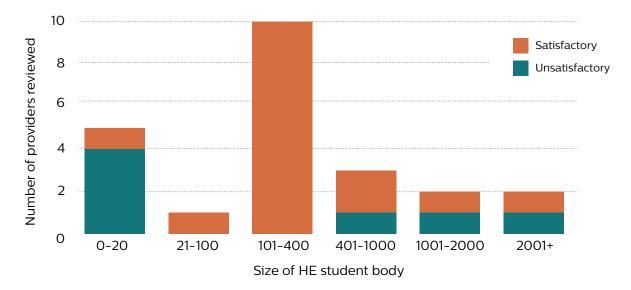
<sup>5</sup> www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=3063

<sup>6</sup> www.qaa.ac.uk/reviews-and-reports/provider?UKPRN=10004061

### Features of satisfactory providers

A number of factors characterise alternative providers achieving satisfactory outcomes. As shown in chart 3, the majority have in excess of 100 students.

Chart 3: Relationship between volume of students and review performance



A clear mission and strategic commitment to higher education seems to be associated with successful outcomes. Alternative providers that meet UK expectations tend to have a clear vocational focus and curriculum.

Alternative providers that perform well also generally work with a small number of university partners, with which they have longstanding relationships.

### Providers with unsatisfactory outcomes

Seven institutions received two or more unsatisfactory judgements. Typically, these providers have a limited understanding of higher education in general, and show a superficial engagement with (and in cases very limited understanding of) the Quality Code. The ability to teach and to enable students to learn at higher levels is, therefore, compromised. Where there is a capability to teach students, it may reflect the norms and expectations associated with lower level study.

Unsatisfactory judgements were received primarily by providers with small numbers of students. The majority of failing providers have been in existence for less than 12 years.

There also appears to be a relationship between poor performance in QAA review and providers that have non-university awarding bodies. Reasons for this bear further investigation, but we believe non-university awarding bodies tend to have less direct involvement with their partners than universities do.

Subjects offered by providers in this group include medicine, health and social care, business, and accountancy. Awarding bodies included the University of Buckingham, Pearson, InterActivE, the Chartered Institute of Marketing (CIM), the Chartered Institute of Management Accountants (CIMA), and the Association of Chartered Certified Accountants (ACCA).

Unsatisfactory judgements	does not meet UK expectations	requires improvement to meet UK expectations
Academic standards	Centre for Advanced Studies Ltd, trading as City of London College	
	London Training Academy Ltd	
	Medipathways Ltd, trading as Medipathways College (result of second review)	
Quality of learning opportunities	Finance and Business Training Ltd	Centre for Advanced Studies Ltd, trading as City of
	London School of Business and Finance*	London College
	London Training Academy Ltd	
	London Waterloo Academy Ltd	
	Medipathways Ltd, trading as Medipathways College (result of second review)	

Chart 4: Providers with unsatisfactory judgements

Quality of Information	London Waterloo Academy Ltd	Centre for Advanced Studies Ltd, trading as City of London College	
		Finance and Business Training	
		London School of Business and Finance	
		London Training Academy Ltd	
		Luton International College Ltd	
		Medipathways Ltd, trading as Medipathways College (result of second review)	
Enhancement	Finance and Business Training Ltd	Centre for Advanced Studies Ltd, trading as City of London	
	London School of Business and Finance	College	
		London Training Academy Ltd	
	London Waterloo Academy Ltd		
	Luton International College Ltd		
	Medipathways Ltd, trading as Medipathways College (result of second review)		

\*In relation to Higher National provision only; all its other provision meets expectations.

A more detailed table with all unsatisfactory outcomes is available in Appendix 4.

The following case studies illustrate and typify the characteristics and features of providers with more than one unsatisfactory judgement.

#### Medipathways Ltd

Medipathways Ltd, trading as Medipathways College, has offered courses for medical students since it was established in 2011. With programmes validated by the University of Buckingham, Medipathways was first reviewed by QAA in May 2014 and received three unsatisfactory judgements.

The College requested a second review (March 2015), which identified four unsatisfactory judgements. The review team identified a number of examples of poor practice, such as:

- shortcomings in the comprehensiveness of the College's frameworks for assuring academic standards
- insufficient evidence of good learning and teaching
- information that is not fit for purpose or trustworthy.

The QAA review team made 14 recommendations in Medipathways' second review, in addition to several recommendations from its first review that were still unmet.

As a result, Medipathways Ltd is not able to apply for another review for Tier 4 purposes for two years, at which time it will be possible to judge whether satisfactory progress has been made. Until that time, Medipathways Ltd will not be able to recruit international students into the UK.

#### **Centre for Advanced Studies Ltd**

The Centre for Advanced Studies Ltd, trading as City of London College, is a recognised centre for Pearson qualifications. Until recently, it also offered programmes leading to University of Wales degrees, but a change in strategy for external partnerships by the University of Wales has meant the end of this partnership. The College currently only delivers Pearson BTEC programmes, but will be discontinuing these qualifications.

In March 2015, the College was investigated under QAA's Concerns Scheme<sup>7</sup> after anonymous allegations about academic malpractice were received.

The Concerns investigation did not find sufficient evidence to suggest any systemic academic malpractice within the College. However, it did identify a number of weaknesses in the quality of provision, and made 18 recommendations for improvement. One of these requires the College to implement a clear process for investigating academic misconduct, in line with awarding organisation guidelines. As a result this provider can no longer offer student support to new students.

### Conclusion

Alternative providers of higher education are an established part of today's diverse and differentiated higher education sector. They are currently reviewed via the same method, Higher Education Review, as universities and colleges.

Around 70 per cent of the 2013-15 reviews resulted in positive judgements (19 out of 27). Eight reviews (of seven providers) had negative outcomes. While there were relatively few 'commended' judgements (two providers, or nine per cent of the cohort), this is similar to the proportion of commended judgements received by publicly funded further education colleges reviewed via Higher Education Review in 2014-15.

QAA's reviews of alternative providers illustrate a range of niche and specialist provision that spans football and sport, needlework, dental nursing and business. Over half of providers reviewed in this period offer programmes that are validated by a UK degree-awarding body. We are finding, in both this and previous analyses, that universities tend to maintain a stronger oversight over their further education college and alternative provider partners than do other awarding organisations.<sup>8</sup> The evidence suggests that this results in better review outcomes and a better student experience.

While relatively few providers are considered in this report, it may be worth noting that the providers with unsatisfactory judgements tended to have fewer higher education students. This concurs with our reviews of further education colleges, where there is an apparent relationship between a college's review outcome and its volume of higher education students: the size of provision seems to correlate positively with better outcomes.<sup>9</sup>

In broad terms, four factors seem to be associated with high performing alternative providers: universities as awarding bodies, a sustainable volume of higher education provision, longevity, and having a distinct mission and purpose. Nevertheless, the New College of the Humanities (established in 2012) and London School of Business and Management Ltd (established in 2000) demonstrate that new entrants can, and do, add to the richness of the higher education sector and provide new opportunities for students while delivering a good student experience.

In accordance with the UK government's policy to guard against poor quality education, the consequences of failing a QAA review are rightly severe. Failing providers are likely to lose their Tier 4 licence and be prohibited from reapplying for two years.

Providers must also have a satisfactory QAA review to apply for their courses to be designated for student support purposes. Such designation is likely to be withheld or withdrawn from those that fail a review, and cannot redeem that failure through a further review within six to nine months.

Of the 23 providers reviewed in 2013-15, seven are currently unable to recruit international students and/or receive state funding for teaching specific courses.

<sup>8 &</sup>lt;u>www.qaa.ac.uk/research/analysis/review-findings</u>

<sup>9</sup> Higher Education Review: Second Year Findings 2014-15, available at: www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2998

### Appendix 1: Background information

#### The Quality Assurance Agency

The Quality Assurance Agency for Higher Education (QAA) is the independent agency dedicated to safeguarding standards and improving the quality of UK higher education wherever it is delivered around the world. We act in the public interest for the benefit of students, and we support universities and colleges in providing the best possible student learning experience. We publish reports on higher education providers,<sup>10</sup> the Quality Code, and other guidance.

#### The UK Quality Code for Higher Education

QAA owns, maintains and publishes the Quality Code, which has been developed with the higher education community to give all providers a shared starting point for setting and maintaining academic standards, assuring and enhancing academic quality, and providing public information about their programmes. It ensures that higher education is comparable and consistent at a threshold level across the UK.

QAA reviewers use the Quality Code as a benchmark for judging whether a higher education provider meets UK expectations for the core elements of the review.

#### Other external reference points

Some providers offer only qualifications that are aligned to the Qualifications and Credit Framework (QCF) or the National Qualifications Framework (NQF). They are expected to provide evidence of the use of the relevant external reference points and guidance on good practice in setting and maintaining academic standards, assuring and enhancing the quality of learning opportunities for students, and providing information about courses. Where providers offer some qualifications that are on the higher education Qualifications Frameworks<sup>11</sup> and others that are on the QCF/NQF, they are expected to show how they use each set of relevant reference points for the purposes set out above.

#### Higher Education Review (Alternative Providers)

<u>Educational oversight reviews</u> and reviews for <u>specific course designation</u> are the methods which QAA uses to review higher education delivered by private providers.

Higher Education Review (Alternative Providers), formerly known as Higher Education Review (Plus), is our review method for alternative providers – independent colleges and universities that offer UK higher education. These providers may operate for profit or have charitable status. Some may wish to obtain a Tier 4 licence to sponsor international students. Others may be eligible to have specific courses designated for student support by the Department for Business, Innovation and Skills.

QAA works closely with the government and awarding bodies to deliver a regulatory regime for alternative providers that protects the student and taxpayer interest. Government policy is to promote and grow good provision while safeguarding against poor quality.<sup>12</sup> Most alternative providers do not have their own degree awarding powers, but offer higher education that leads to qualifications or academic credit of degree-awarding bodies and/ or of Ofqual-regulated awarding organisations. In support of this goal Higher Education

<sup>10</sup> www.qaa.ac.uk/reviews-and-reports.

<sup>11 &</sup>lt;u>www.qaa.ac.uk/publications/information-and-guidance/publication?PubID=2843</u>

<sup>12</sup> www.gov.uk/government/uploads/system/uploads/attachment\_data/file/450090/BIS-15-440-guidance-for-alternativehigher-education-providers.pdf

Review (Alternative Providers) assesses quality and standards at the providers reviewed. The consequences of failing a QAA review include withdrawal of student support funding for some or all of the provider's higher education courses.

Higher Education Review (Alternative Providers) is a review of a provider's quality assurance arrangements including two components:

- desk-based analysis of a wide range of information about the programmes of study on offer
- a visit to review the provider's arrangements for maintaining the academic standards and quality of the courses it offers.

For providers seeking Tier 4 Highly Trusted Sponsor status it also includes a check on financial sustainability, management and governance (FSMG check). The FSMG check aims to provide public confidence that, in the case of financial failure of the provider, arrangements would be in place to enable students to complete their course. The review of quality assurance arrangements provides assurance that the provider meets UK expectations for standards and quality.

For providers in England undergoing Higher Education Review (Alternative Providers) for course designation the FSMG check is carried out by the Higher Education Funding Council for England (HEFCE) after the quality assurance review has taken place and is conducted entirely separately. For providers undergoing the review for Tier 4 purposes the FSMG check is carried out by QAA.

Students are at the heart of Higher Education Review (Alternative Providers). There are opportunities for them to take part in the review, including by contributing a student submission, meeting the review team during the review visit, working with their providers in response to review outcomes, and acting as the lead student representative during the review process. Review teams of three or more normally include a student reviewer.

Higher Education Review (Alternative Providers) culminates in the publication of a report containing the judgements and other findings. The provider is then obliged to produce an action plan in consultation with students, describing how it intends to respond to those findings. Progress on the implementation of action plans is monitored through the annual monitoring process.

QAA review teams make judgements on:

- the maintenance of academic standards
- the quality of student learning opportunities
- information about learning opportunities
- the enhancement of student learning opportunities.

The judgement on the maintenance of academic standards is expressed as one of the following:

- meets UK expectations
- requires improvement to meet UK expectations
- does not meet UK expectations.

The judgements on learning opportunities, information and enhancement are expressed as one of the following:

- commended
- meets UK expectations
- requires improvement to meet UK expectations
- does not meet UK expectations.

The judgements 'commended' and 'meets UK expectations' are considered to be satisfactory judgements, whereas the judgements 'requires improvement to meet UK expectations' and 'does not meet UK expectations' are unsatisfactory.

The review team also identifies features of good practice and makes recommendations for action.

#### Impact and follow-up actions by providers

#### Educational oversight

QAA is the designated educational oversight body for higher education providers requiring educational oversight for Tier 4 Sponsorship purposes. Two weeks after the end of a review a letter setting out the provisional key findings is sent to HEFCE, the Home Office, and other relevant degree-awarding bodies or awarding organisations. If an unsatisfactory judgement is given the approach taken is detailed in the UK Government guidance on Tier 4 sponsorship.<sup>13</sup>

#### **Specific Course Designation**

Two weeks after the end of a review a letter setting out the provisional key findings is sent to HEFCE, the Department for Business, Innovation and Skills and other relevant degree-awarding bodies or awarding organisations. If an unsatisfactory judgement is given the approach taken is detailed in the UK Government guidance on Specific Course Designation.<sup>14</sup>

#### Annual monitoring

The annual return and the monitoring visits are an integral part of the overall review process. All alternative providers must undergo annual monitoring until the time of their next review. Nine to 10 months after the first full review providers submit an annual return, which is the initial stage of annual monitoring and determines what happens next.

There are four possible outcomes from QAA's analysis of the annual return:

- the provider is making commendable progress
- the provider is making acceptable progress
- the provider is making progress but further improvement is required
- the provider is not making acceptable progress.

Providers making commendable progress do not receive a monitoring visit until the subsequent year, unless they undergo a material change in circumstances or other concerns are raised. These providers may have to then undergo future annual monitoring or possibly a full Higher Education Review (Alternative Providers).

Providers making acceptable progress receive an annual monitoring visit and will continue to receive one each year until their next periodic Higher Education Review (Alternative Providers) unless they either receive a subsequent commendable outcome (exempting them from one annual monitoring visit) or require a full review following a material change in circumstances or because other concerns have been raised.

Providers that meet a risk indicator threshold (such as an increase in student numbers above 20 per cent or 100 students, whichever is greater, or a change of provision of more than 30 per cent) are required to undergo a more intensive scrutiny which may take the form of an extended monitoring visit or a partial or full review. Similarly, providers that have had a monitoring visit with an outcome of 'further improvement required' or 'not making acceptable progress' must undergo a full QAA review. Four providers covered in this report were fully reviewed in both 2013-14 and 2014-15 because one of these risk criteria was met.

<sup>13</sup> www.gov.uk/government/publications/sponsor-a-tier-4-student-guidance-for-educators

<sup>14</sup> www.gov.uk/government/uploads/system/uploads/attachment\_data/file/535846/bis-16-293-specific-coursedesignation-2016.pdf

## Appendix 2: Alternative providers reviewed 2013-15

Provider	Date of review/monitoring
British Institute of Technology Ltd	October 2015
CCP Graduate School Ltd	April 2014, amended June 2015
Centre for Advanced Studies Ltd t/a City of London College	September 2015 Concerns March 2015
Centre for Homeopathic Education	May 2014, amended June 2015
Christie's Education Ltd	November 2015
Finance and Business Training Ltd	March 2015
ICMP Management Ltd t/a The Institute of Contemporary Music Performance	February 2015 Monitoring March 2016
Ifs University College	November 2014 Monitoring February 2016
Inter-Ed UK Ltd t/a The City College	October 2015
London School of Business and Finance	March 2015
London School of Business and Management Ltd	October 2015
London Training Academy Ltd	July 2015
London Waterloo Academy Ltd	July 2015
Luton International College Ltd	October 2015
Medipathways Ltd t/a Medipathways College	March 2015
Moorlands College	May 2014 Monitoring May 2015 and 2016
Pearson College	May 2014 Monitoring May 2015 and 2016
Tertiary Education Services Ltd t/a New College of the Humanities	February 2015 Monitoring February 2016
The Condé Nast Publications Ltd t/a Condé Nast College of Fashion and Design	March 2015 Monitoring March 2016
The Prince's Foundation for Building Community	June 2015
The Royal School of Needlework	June 2014 Monitoring June 2016
UCFB College of Football Business Ltd	June 2015
Urdang Schools Ltd t/a Urdang Academy	February 2015 Monitoring February 2016

### Appendix 3: Review outcomes

Judgement	Outcome	Percentage	Number
Academic standards	meet UK expectations	85%	23
	require improvement to meet UK expectations	0%	0
	do not meet UK expectations	11%	3
	Higher National provision does not meet UK expectations; all other provision does	4%	1
Learning opportunities	are commended	4%	1
	meet UK expectations	74%	20
	require improvement to meet UK expectations	4%	1
	do not meet UK expectations	19%	5
Information	is commended	0%	0
	meets UK expectations	70%	19
	requires improvement to meet UK expectations	22%	6
	does not meet UK expectations	7%	2
Enhancement	is commended	4%	1
	meets UK expectations	67%	18
	requires improvement to meet UK expectations	11%	3
	does not meet UK expectations	19%	5

### Appendix 4: Unsatisfactory outcomes

Unsatisfactory outcomes: Higher Education Review (Alternative Providers) 2013-15. A shaded area means that expectations were met.

Provider	Academic standards	Quality of learning opportunities	Quality of Information	Enhancement
Centre for Advanced Studies Ltd, trading as City of London College	does not meet UK expectations	requires improvement to meet UK expectations	requires improvement to meet UK expectations	requires improvement to meet UK expectations
Finance and Business Training Ltd	meets UK expectations	does not meet UK expectations	requires improvement to meet UK expectations	does not meet UK expectations
London School of Business and Finance Ltd	meets UK expectations	Higher National provision - does not meet all other provision - meets	requires improvement to meet UK expectations	does not meet UK expectations
London Training Academy Ltd	does not meet UK expectations	does not meet UK expectations	requires improvement to meet UK expectations	requires improvement to meet UK expectations
London Waterloo Academy Ltd	meets UK expectations	does not meet UK expectations	does not meet UK expectations	does not meet UK expectations
Luton International College Ltd	meets UK expectations	meets UK expectations	requires improvement to meet UK expectations	does not meet UK expectations
Medipathways Ltd, trading as Medipathways College (result of second review)	does not meet UK expectations	does not meet UK expectations	requires improvement to meet UK expectations	does not meet UK expectations

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