



Thames College Berkshire Ltd

Review for Educational Oversight by the Quality Assurance Agency for Higher Education

December 2013

Key findings about Thames College Berkshire Ltd

As a result of its Review for Educational Oversight carried out in December 2013, the QAA review team (the team) considers that there can be **no confidence** in how the provider manages its stated responsibilities for the standards of the programmes it offers on behalf of ATHE and Pearson.

The team also considers that there can be **no confidence** in how the provider manages its stated responsibilities for the quality and enhancement of the learning opportunities it offers on behalf of these organisations.

The team considers that reliance **cannot** be placed on the information that the provider produces for its intended audiences about the learning opportunities it offers.

Recommendations

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

The team considers that it is **essential** for the provider to:

- put in place effective formal structures with defined roles and responsibilities for the management of academic standards and the quality of learning opportunities (paragraph 1.1)
- implement a robust and systematic process for annual monitoring, evaluation and review of its academic activities (paragraph 1.4)
- systematically implement and formally record progress on action points raised by external verifiers (paragraph 1.7)
- implement clear and robust systems for developing, reviewing, updating and disseminating information about learning opportunities (paragraph 3.4).

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

- establish a formal committee structure to manage academic standards and quality of learning opportunities (paragraph 1.2)
- make reports and minutes of all academic activity more readily available to staff and students (paragraph 1.3)
- engage more effectively with external reference points (paragraph 1.5)
- formalise the system for standardisation and internal verification (paragraph 1.6)
- implement and disseminate a coherent teaching and learning strategy (paragraph 2.2)
- develop a strategy to assure the quality of feedback to learners (paragraph 2.5)
- introduce a formal system of student representation (paragraph 2.6)
- implement a system to maintain formal student records (paragraph 2.7)
- implement policies for staff appraisal, teaching observation and staff development (paragraph 2.9)
- establish a learning resources plan (paragraph 2.10)
- formalise the system to disseminate information in handbooks (paragraph 3.1).

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

- include information on learning and teaching, and assessment in the induction process (paragraph 2.4).

About this report

This report presents the findings of the [Review for Educational Oversight](#)¹ (REO) conducted by [QAA](#) at Thames College Berkshire Ltd (the College), which is a privately funded provider of higher education. The purpose of the review is to provide public information about how the provider discharges its stated responsibilities for the management and delivery of academic standards and the quality of learning opportunities available to students. The review applies to programmes of study that the provider delivers on behalf of ATHE and Pearson. The review was carried out by Joanne Coward and Peter Green (reviewers) and Christopher Mabika (Coordinator).

The review team conducted the review in agreement with the provider and in accordance with the [Review for Educational Oversight: Handbook](#).² Evidence in support of the review included policy and operational documents, minutes of meetings, a report of inspection by the Independent Schools Inspectorate (ISI), external examiner reports from ATHE and meetings with management, staff and students.

The review team also considered the provider's use of the relevant external reference points:

- subject benchmark statements
- *The framework for higher education qualifications in England, Wales and Northern Ireland* (FHEQ)
- the UK Quality Code for Higher Education (the Quality Code).

Please note that if you are unfamiliar with any of the terms used in this report you can find them in the [Glossary](#).

The College is situated in Reading. It was established in 2010 and began teaching in April 2011. The College recruits its students mostly from Pakistan and Bangladesh. It offers higher education courses in business studies, management, health and social care. At the time of the review, the College had 261 full-time students enrolled on the following higher education programmes, listed beneath their awarding organisations:

ATHE

- Level 6 Diploma in Healthcare Management (15 students)
- Level 7 Diploma in Healthcare Management (99 students)
- Level 6 Diploma in Management (54 students)

Pearson

- Level 5 HND in Business (93 students).

The provider's stated responsibilities

In relation to its higher education provision, the College's responsibilities include:

- student admission and induction
- performance evaluation
- providing guidance, and teaching and learning
- setting, marking and moderating assessments
- processing appeals on assessments
- all staff issues such as recruitment and selection, induction, and development.

¹ www.qaa.ac.uk/educational-oversight

² www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/REO-designated-providers-handbook-13.aspx

It shares responsibility for quality reviews and monitoring with the awarding organisations. The awarding organisations, however, develop all programme specifications and intended learning outcomes.

Recent developments

No major developments in the higher education provision of the College had taken place prior to the review. However, the proprietor/director is in the process of selling the College, with the incoming proprietor/director on site during the review visit to finalise the due diligence process.

Due to being in this transitional phase, the College has two organisational structures in place. In one of these, the proprietor/director is the Chief Executive Officer. The College Strategic Plan states that a Board of Directors manages the College, making business decisions and setting its strategic direction. The new and outgoing proprietors/directors hold key positions, as Head of Marketing and Head of Finance, respectively.

Students' contribution to the review

Students were invited to present a submission to the review team, which they did in the form of a video recording and a report. Student representatives from each of the higher education programmes attended a meeting with the review team. The students participated actively and freely gave their opinion.

Detailed findings about Thames College Berkshire Ltd

1 Academic standards

How effectively does the College fulfil its responsibilities for the management of academic standards?

1.1 The College lacks clearly defined roles and responsibilities for the management of academic standards, causing the oversight of academic activities during the transitional phase to suffer. The two organisational structures in place have vastly different numbers of staff and reporting relationships. The structures do not clearly define roles of staff, including that of the Principal. The Management Team reported that the last substantive Principal left the College in June 2013 and since then it has appointed a Principal who becomes full-time in January 2014. This has led to different members of senior staff often acting as Principal. The College lacks independent oversight of quality assurance, with both the Principal and the Director designated to take this role. The Management Team acknowledged that this has the potential to cause conflict of interest and further role obscurity. It is **essential** for the College to put in place effective formal structures with defined roles and responsibilities for the management of academic standards and the quality of learning opportunities.

1.2 The structures for the management of academic standards operate informally. An example are the committees. The College states that the Academic Committee maintains academic standards. However, the Management Team agrees that this is effectively a staff committee, with no real oversight of the management of academic standards. The Academic Board instead assumes oversight of academic standards, but minutes of the Board were not made available to the team. The College claims that it maintains academic standards through discussion rather than formal processes. Although the College keeps an Academic Calendar, meetings of its committees take place on an informal basis. The College does not have a system of reporting for these committees and does not provide a clear audit trail of their decisions. There is no continuity of outcomes through each meeting; the Management Team and staff agree that there is no formal system to monitor the implementation of recommendations from committee meetings. It is **advisable** for the College to establish a formal committee structure to manage academic standards and quality of learning opportunities.

1.3 The College does not effectively communicate information, relating, for example, to the functioning of these committees to staff and students. Despite claiming that student representatives are part of the composition of the Academic Committee, minutes of meetings show that student representatives have never attended any meetings. Students confirmed that they were unaware of any committees within the College's governance structure to which student representatives were invited. Staff stated that they were not aware of the College's three-year strategy. Staff also stated that the College did not share with them the actions required or recommendations made in external verifier reports (see paragraph 1.7). The College acknowledges that it has not disseminated to staff and students the little relevant documentation that is available for the management of academic standards. It is **advisable** for the College to make reports and minutes of relevant academic activity more readily available to staff and students.

1.4 The College does not effectively conduct programme annual monitoring reviews, which it states to be one of its responsibilities. Its only recorded report of an annual monitoring review covers one programme. The Management Team and staff agreed that academic staff were not engaged or involved in the production of this report, nor have they seen it. Neither the Management Team nor academic staff at the College could identify the current process of monitoring, evaluation, review and implementation of actions in such

reports. The absence of an annual monitoring, evaluation and review mechanism puts the College's management of academic standards at risk. It is **essential** for the College to implement a robust and systematic process for annual monitoring, evaluation and review of its academic activities.

How effectively does the College make use of external reference points to manage academic standards?

1.5 The College makes little reference to the Quality Code, and shows little evidence that it has embedded the Quality Code in its teaching. The College references the Quality Code only in the Teaching and Learning Strategy, where it is presented as a goal to pursue. Recognising that the current Quality Assurance Manual does not refer to the Quality Code, and that only part of the manual is in operation and effectively not fit-for-purpose, the College has developed a new Quality Manual, which includes some reference to the Quality Code. However, the new manual will only be effective from January 2014. The College states that it also references the Quality Code through the awarding organisations, basing elements of the course material, such as level descriptors, on the Quality Code. However, academic staff are unaware of the Quality Code and how to use it to support the College's learning environment. It is **advisable** for the College to engage more effectively with external reference points.

How does the College use external moderation, verification or examining to assure academic standards?

1.6 The College has an Internal Verification Policy and methods of standardisation which it applies informally. Staff attended a briefing workshop on the standardisation process and the College has recently appointed an internal verifier. Staff confirmed some internal verification exists, with second marking of assignments and internal approval of grades. However, academic staff confirmed the statement in the ATHE report, that the College does not take assignment briefs through any internal verification or standardisation. ATHE also identified serious problems in the marking and internal verification processes applied to assignments for students on its programmes, which the College failed to address (see paragraph 1.7). It is **advisable** for the College to formalise the system for standardisation and internal verification.

1.7 The College has failed to respond to key action points raised by external verifiers. It did not address a number of serious concerns raised in the reports, including its lack of a reasonable adjustment and special consideration policy, and failure of academic staff to make assessment judgements based on stated criteria. The reports also note a lack of feedback to students; lack of records of assessment decisions; failure to track the progress of learners; and failure to register students within 14 days of enrolment on ATHE programmes. There were also cases where students received pass marks without meeting the assessment criteria. The College also failed to provide student achievement and progression statistics. It is **essential** for the College to systematically implement and formally record progress on action points raised by external verifiers.

1.8 There are major concerns about the College's capacity to secure academic standards. There are no formal structures for managing standards, and no clearly defined roles and responsibilities for staff or committees. The College does not have robust processes for annual monitoring, internal verification or for responding to actions raised by external examiners.

The review team has **no confidence** in the provider's management of its responsibilities for the standards of the programmes it offers on behalf of its awarding organisations.

2 Quality of learning opportunities

How effectively does the College fulfil its responsibilities for managing and enhancing the quality of learning opportunities?

2.1 The issues discussed in paragraphs 1.1 to 1.4 also apply to the management roles and responsibilities, structures, and systems of monitoring, evaluation and review that the College uses to fulfil its responsibilities for managing and enhancing the quality of learning opportunities.

2.2 The College has three versions of the Teaching and Learning Strategy, one of which only contains information on the College assessment policy. There is no evidence that any of these versions are in operation as neither management nor teaching staff could comment on them. Overall, there is no evidence that the Management Team has sufficient oversight of what is taking place in the classroom. It is **advisable** for the College to implement and disseminate a coherent teaching and learning strategy.

How effectively does the College make use of external reference points to manage and enhance learning opportunities?

2.3 As in paragraph 1.5, the College makes little use of external reference points to effectively manage and enhance learning opportunities.

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

2.4 The College's staff induction process does not include information on teaching and learning, assessment policies and other elements related to the delivery of the curriculum. It has a staff induction policy and applies processes for the recruitment of academic staff. All staff positions have clear job descriptions and person specifications. The College interviews all candidates and checks their qualifications for validity. It requires academic staff to hold qualifications at least one level higher than the level they will be teaching, and to hold a teaching qualification, with the Preparing to Teach in the Lifelong Learning Sector (PTTLS) as the minimum. The College is providing financial support to a member of staff to acquire a teaching qualification and fulfil this requirement. All new staff undergo an induction, which concentrates on the workings of the College and its policies and procedures such as fire safety. It is **desirable** for the College to include information on learning and teaching, and assessment in the induction process.

2.5 The College does not use appropriate assessment feedback to enhance the learning environment. Academic staff described an informal process of standardisation, marking, double-marking of samples of assignments and internal verification (see paragraph 1.6). It is not clear if, or how, the College uses such processes to support the assessment process and the quality of teaching and learning. In addition, students who met the review team reported that they had not received marked work and thus had not had formal feedback on their academic progress. They stated that they had received informal feedback from their tutors. The team examined samples of student work provided by the College, among which only one piece of work had been marked. It is **advisable** for the College to develop a strategy to assure the quality of feedback to learners.

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

2.6 There is no formal system of student representation. The College does not have a student representative committee and does not appoint student representatives. Although students stated that they could raise issues relating to module delivery directly with teaching staff, they could not raise pastoral matters. The Management Team stated that it has a system of module evaluation using student questionnaires and students confirmed that they completed surveys at the end of each module. However, the Management Team could not describe how the information gained from these surveys was used to enhance the quality of learning opportunities. Students confirmed that they did not receive feedback on the overall outcome of module evaluation. The College has no formal system to allow students to raise concerns directly with the Management Team or for the College to formally record action taken as a result of issues raised. It is **advisable** for the College to introduce a formal system of student representation.

2.7 The College's maintenance of student records is not effective. The College maintained that it was authorised to teach a course from a particular awarding organisation. Despite several requests from the team, the College was unable to confirm that a formal agreement with this awarding organisation exists. The College submitted a list of names of students who were meant to be studying on the course. Some members of staff who participated in meetings with the team also stated that they taught on this course. The College could not however show what course the students were actually studying on. It is **advisable** for the College to implement a system to maintain formal student records.

2.8 Students expressed their general satisfaction at the level of support they received from academic staff, describing the staff as accessible and responsive to their needs. However, this contradicted the students' views in the Student Attitudes survey where they expressed some disquiet over the level and quality of administrative support they received from the College, the quality of the library resources, and management failure to respond to their concerns. The Management Team could not confirm whether the College had formally responded to the outcome of this survey.

How effectively does the College develop its staff in order to improve student-learning opportunities?

2.9 The College informally applies its own policies for staff appraisal and teaching observation. Academic staff stated that they organised their own peer observations outside the formal College systems. Similarly, appraisals are informal and only one member of the academic staff had agreed to have an appraisal. The outcomes of the appraisal were not recorded, and staff appraisals and observations do not feed into staff development plans. It is **advisable** for the College to implement policies for staff appraisal, teaching observation and staff development.

How effectively does the College ensure that learning resources are accessible to students and sufficient to enable them to achieve the intended learning outcomes?

2.10 The College does not have a budget allocated to ensure that a sufficient range and stocks of learning resources are available for students. Both staff and students stated that they made informal requests for learning resources such as library reference books, which the Director informally supported. It is **advisable** for the College to establish a learning resources plan.

2.11 Inadequacies exist in the College's provision of learning opportunities to its students. It does not deploy appropriate strategies, policies and plans to guide teaching and learning, or to provide sufficient information and resources to support these activities.

The review team has **no confidence** that the provider is fulfilling its responsibilities for managing and enhancing the quality of the intended learning opportunities it provides for students.

3 Information about learning opportunities

How effectively does the College communicate information about learning opportunities to students and other stakeholders?

3.1 The College's communication of information about learning opportunities to students and other stakeholders is ineffective. It uses a range of media, including the prospectus, website, an intranet and student handbooks to disseminate information. While some students reported that they received handbooks, containing details of each module and programme specifications, the handbooks were not made available to the review team. Although the College has a Module Handbook, that covers all courses and modules on offer, this does not contain specific assessment criteria or learning outcomes for each module. Both academic staff and students reported that the main method of communication for any module information was directly from individual academic staff to students in the classroom. It is **advisable** for the College to formalise the system to disseminate information in handbooks.

3.2 The College provides inaccurate information about learning opportunities for students. The website still shows the College to be accredited by awarding organisations that no longer exist. The College also has a prospectus available to download from the website, which it claims it amended recently to cover the 2013-14 intake of students. However, the prospectus still has a welcome message from the Principal who left in June 2013.

How effective are the College arrangements for assuring that information about learning opportunities is fit for purpose, accessible and trustworthy?

3.3 The College's arrangements for ensuring that information about learning opportunities is fit-for-purpose, accessible and trustworthy are ineffective. It reports that it normally updates and reviews the website daily, but this is currently not the case because of the transition of ownership. The outgoing Director still has overall responsibility for ensuring that all information about learning opportunities is accurate and reliable. The Director was not available at the time of the review and it was not evident which member of staff took over this responsibility in his absence. The former IT Officer, who left the organisation in September 2013, used to take responsibility in the absence of the Director. The Management Team acknowledged that the Director's absence meant it was difficult to obtain reliable evidence with regard to the quality of procedures for approving information of this nature. As a result, there is no formal process to sign off the content of student handbooks and module guides and, as such, the College cannot assure itself of the accuracy of information about its learning opportunities.

3.4 The College has a Publishing Policy, produced by the outgoing Director, that is not yet operational. The Principal now oversees this policy. The College reported that it has a version control system which requires all documents to go through an iteration process from academic staff to management for sign-off by the Principal. Prior to sign-off, all information

about learning opportunities has to be scrutinised by the Academic Committee. Yet there is no evidence that the Committee has scrutinised information about learning opportunities. In addition, there are no minutes or records kept to highlight changes made to documentation. Since the appointment of the new Principal in September 2013, no documentation has gone through the version control system. It is **essential** for the College to implement clear and robust systems for developing, reviewing, updating and disseminating its information about learning opportunities.

3.5 Significant flaws have been identified in the processes the College applies to assure itself that dependable information reaches its students. Systems to check and continuously update information available to students to maintain its accuracy, currency and relevance are inadequate.

The team concludes that reliance **cannot** be placed on the information that the provider produces for its intended audiences about the learning opportunities it offers.

Action Plan

The provider was required to develop an action plan to follow up on good practice and address recommendations arising from the review. However, an action plan was not complete at the time of publication and the report is therefore published without one.

About QAA

QAA is the Quality Assurance Agency for Higher Education. QAA's mission is to safeguard standards and improve the quality of UK higher education.

QAA's aims are to:

- meet students' needs and be valued by them
- safeguard standards in an increasingly diverse UK and international context
- drive improvements in UK higher education
- improve public understanding of higher education standards and quality.

QAA conducts reviews of higher education institutions and publishes reports on the findings. QAA also publishes a range of guidance documents to help safeguard standards and improve quality.

More information about the work of QAA is available at: www.qaa.ac.uk.

More detail about Review for Educational Oversight can be found at: www.qaa.ac.uk/educational-oversight.

Glossary

This glossary explains terms used in this report. You can find a fuller glossary at: www.qaa.ac.uk/aboutus/glossary. Formal definitions of key terms can be found in the [Review for Educational Oversight: Handbook](#).³

academic quality A comprehensive term referring to how, and how well, higher education providers manage teaching and learning opportunities to help students progress and succeed.

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

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.

awarding organisation An organisation authorised to award a particular qualification; an organisation recognised by Ofqual to award Ofqual-regulated qualifications.

designated body An organisation that has been formally appointed or recognised to perform a particular function. QAA has been recognised by UKBA as a designated body for the purpose of providing educational oversight.

differentiated judgements In a Review for Educational Oversight, separate judgements respectively for the provision validated by separate awarding bodies.

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 QAA's review processes.

external examiner An independent expert appointed by an institution to comment on student achievement in relation to established academic standards and to look at approaches to assessment.

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*.

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 review processes.

highly trusted sponsor An organisation that the UK Government trusts to admit migrant students from overseas, according to Tier 4 of the UK Border Agency's points-based immigration system. Higher education providers wishing to obtain this status must undergo a successful review by QAA.

³ www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/REO-designated-providers-handbook-13.aspx

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.

operational definition A formal definition of a term, which establishes 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.

provider (s) (of higher education) Organisations that deliver higher education. In the UK they may be a degree-awarding body or another organisation that offers programmes of higher education on behalf of degree-awarding bodies or awarding organisations. In the context of Review for Specific Course Designation the term means an independent college.

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

quality See **academic quality**.

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. Internal reference points may be used by providers for purposes of self-regulation; external ones are used and accepted throughout the higher education community for the checking of standards and quality.

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.

threshold academic standards 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 for higher education qualifications** and **subject benchmark statements**. See also **academic standards**.

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