



Educational Oversight: A Report on the First Year of the Annual Monitoring Process in 2013

Executive summary

One hundred and sixty three monitoring visits took place in 2013, which were analysed according to the outcome of the visit and the expectations of the UK Quality Code for Higher Education (Quality Code).

Forty three providers were found to be making commendable progress, 105 visits concluded that acceptable progress was being made, and 15 providers were found to be requiring improvement.

The Chapters of the Quality Code most referred to in the monitoring visit reports were:

- *Chapter B3: Learning and Teaching*
- *Chapter B4: Enabling Student Development and Achievement*
- *Chapter B6: Assessment of Students and Recognition of Prior Learning*
- *Chapter B8: Programme Monitoring and Review*
- *Chapter B5: Student Engagement*
- Part C: Information about Higher Education Provision.

Overall, providers found to be making commendable progress demonstrated that they had fully implemented and evaluated, where possible, the impact of the action plan from their previous review. In many cases, such providers had gone beyond the action plan and further enhanced their provision or their management processes.

Most providers were making acceptable progress in implementing their action plan. Where actions had not been fully implemented or evaluated, there was little risk to the maintenance of academic standards, or quality, and providers were aware of where they needed to improve.

Providers that required improvement to make acceptable progress typically had not implemented the action plan effectively, or actions taken had not fully addressed the recommendations in their previous review report. In many cases, such providers were also not engaging effectively with the Quality Code, which would have supported the development of their management processes and improved their effectiveness in managing their higher education provision.

Engagement of students in quality assurance and enhancement is shown to have improved across most providers, with considerable work being undertaken to engage students effectively in shaping their learning experiences.

Introduction

Educational oversight consists of periodic reviews, an annual return, and interim monitoring visits between reviews. The annual return and the monitoring visit are an integral part of the overall review process; they serve as a short check on the provider's continuing management of academic standards, the management and enhancement of the quality of learning opportunities, and the information it publishes about its academic provision. The annual return provides an opportunity for providers to reflect upon developments made in their management of academic standards and quality since the previous review or monitoring visit, and for QAA to note any matters which will be of particular interest to the team that conducts the provider's next review or monitoring visit.

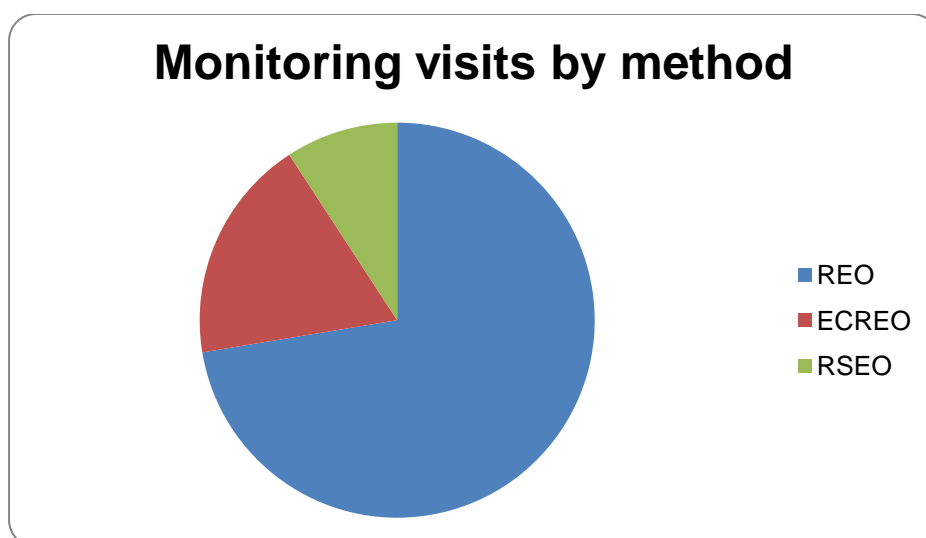
The monitoring process also has a developmental aspect, in that it also serves to support providers in working with the Quality Code. The Quality Code gives all higher education providers a shared starting point for setting, describing and assuring the academic standards of their higher education awards and programmes and the quality of the learning opportunities they provide.

This report provides an analysis of the outcomes of the 163 Annual Monitoring visits carried out in 2013. It is hoped that this report will be of value to providers who underwent an Annual Monitoring review in 2013, and who are keen to compare and contrast their own provision and outcomes with other providers who underwent the same type of review.

This report follows on from the earlier one on educational oversight, Educational Oversight: One Year On, and many of the 209 providers undergoing an educational oversight review in 2012 would have had an annual monitoring review in 2013. However the two reports are not contiguous as 30 of the institutions that underwent an educational oversight in 2012 would not be eligible for annual monitoring in 2013 and some providers will have merged or closed.

Overview of the annual monitoring process

There are three types of educational oversight review: the Review for Educational Oversight (REO) method, the Recognition Scheme for Educational Oversight (RSEO) method, and the Embedded College Review for Educational Oversight (ECREO) method. Annual monitoring is a critical element of all three types of review. In 2013, 118 REO, 30 ECREO and 15 RSEO monitoring visits were carried out.



There are four sections in an annual monitoring review report. The first is simply a statement giving the overall judgement about progress. The second section details changes since the last review whilst the third, Findings from the Monitoring Visit, provides the text and reasoning to support the overall judgement in section 1. The final section provides a commentary on the progress the provider has made with working with external reference points including the Quality Code.

The first year of annual monitoring following a full review focuses on actions taken against the published action plan in the full review report. There are four possible outcomes from a monitoring visit:

- 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 who are making commendable progress are not then subject to a further annual monitoring visit for two years, unless the provider undergoes a material change in circumstances or other concerns are raised about the provider's management of its academic provision. A provider making acceptable progress would normally undergo a further monitoring visit after 12 months. A monitoring review that concludes that either acceptable or commendable progress is being made is needed to keep educational oversight. Those providers who fail to get one of these outcomes must undergo a full review to maintain their Highly Trusted Sponsor status.

It should be noted that, in coming to their overall judgement, reviewers will have weighed all their separate findings. This means that it is entirely possible to find aspects of good progress in a report where the summary judgement is 'requires improvement'. Similarly in a report where the overall outcome is that 'acceptable' progress is being made, separate findings may find that progress in certain aspects is limited or incomplete.

As the annual monitoring process focuses on action taken against the educational oversight action plan the visit report should start to show whether the ongoing quality enhancement aspect of educational oversight is being achieved.

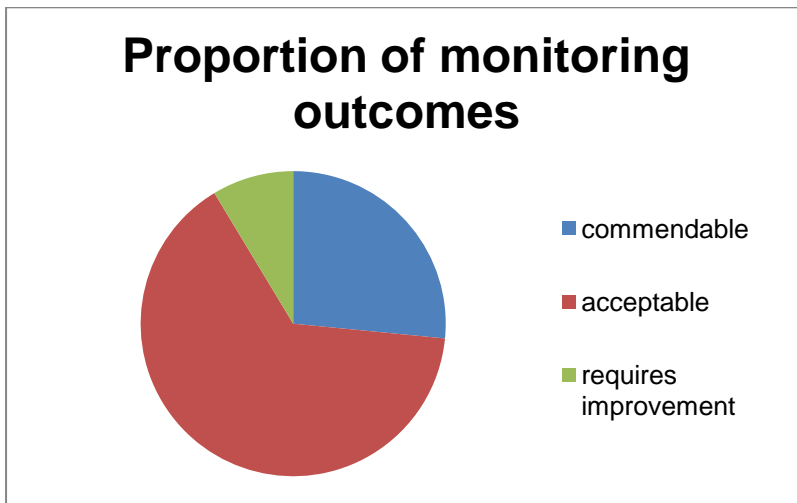
Methodology

This report analyses Annual Monitoring reports from 118 REO, 30 ECRO and 15 RSEO reviews (163 reports in total). The main analysis is based on the type of judgement. For the purposes of this report, because the numbers are small, 'requires improvement' and 'not making acceptable progress' being considered together, as one single group under the banner 'requires improvement'. Each set of reports correlating to one of these outcomes (commendable, acceptable, requires improvement) has then been analysed against the expectations of the Quality Code. Some 1566 comments within the 163 reports have been analysed.

Findings from annual monitoring visits

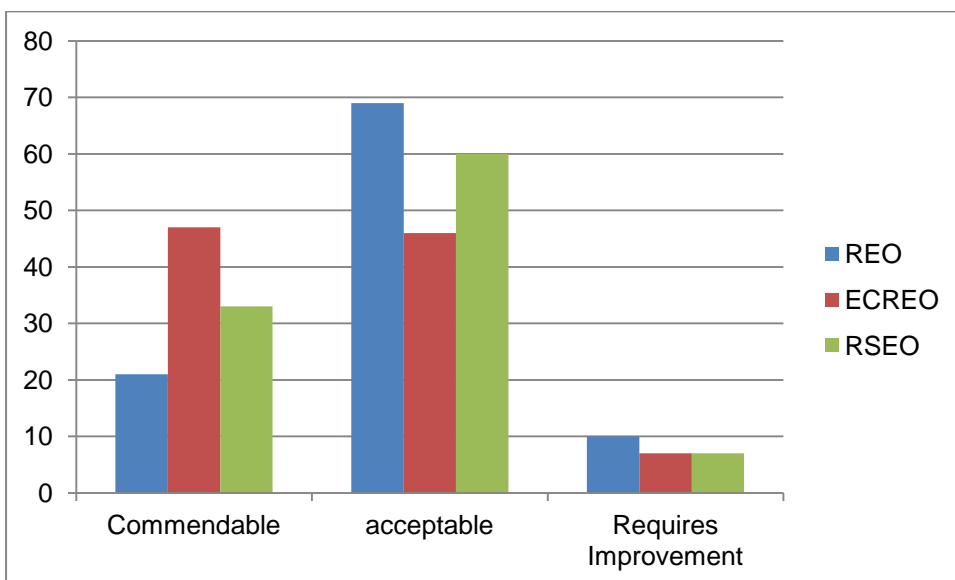
Forty three providers were making commendable progress (27 per cent). One hundred and five visits concluded that acceptable progress was being made (64 per cent) and 15 providers (nine per cent) were required to make improvements. Thus the overall success rate is 91 per cent. The overall success rate in educational oversight full reviews in 2012 was lower at 86 per cent so an improvement has been recorded in the overall pass rate. However, only 27 per cent of annual monitoring reports showed commendable progress, and

therefore did not need further annual monitoring, so there is still a need to monitor most providers.



There is a significant difference in the types of outcome and the type of educational oversight method. In terms of commendable judgements, 47 per cent of annual monitoring reports following ECREO reviews were judged as commendable; 33 per cent following from RSEO reviews; and just 21 per cent followed on from REO reviews.

A similar trend can be seen in outcomes where the judgement was 'requires improvement' where just over 10 per cent of REO annual monitoring reviews were given this grade, compared with 7 per cent following ECREO and RSEO reviews. However, it should be noted that the overall numbers of providers in the ECREO and RSEO methods is significantly smaller than for the REO method.



The most common parts of the Quality Code the findings of annual monitoring review reports can be mapped to were (in order):

- *Chapter B3: Learning and Teaching*
- *Chapter B4: Enabling Student Development and Achievement*
- *Chapter B6: Assessment of Students and Recognition of Prior Learning*
- *Chapter B8: Programme Monitoring and Review*

- *Chapter B5: Student Engagement*
- Part C: Information about Higher Education Provision.

These findings apply for all types of judgements. The only material difference in the mapping is that those requiring improvement had more comments, frequently critical ones, concerning Information than the other two types of outcomes. It is also notable that very few comments in all 163 reports related to Part A of the Quality Code (less than 20 out of 1566 in total). However, providers' awarding bodies and organisations are typically responsible for most of the activity connected with setting and maintaining threshold academic standards, with most of the providers' responsibilities reflecting the cognate sections of Part B of the Quality Code.

The commentary below is structured against the three types of judgement outcome (commendable, acceptable, requires improvement). First, general themes are picked out that exemplify the progress made against the action plan in that type of judgement outcome, and then, in each of the three sets of judgements, the progress made is analysed against the chapters of the Quality Code most frequently referred to in the monitoring visit reports. Each finding is supported by quotes from relevant monitoring visit reports.

Themes arising from commendable outcomes

General Themes

Reports from 43 annual monitoring reviews showed that commendable progress was being made. The themes that mark out providers who were judged to be making 'commendable' are three-fold:

- 1 Each and every action in the action plan had been vigorously and comprehensively pursued.

It has addressed fully each of the 2012 review report's points of good practice and recommendations and has, overall, made commendable progress during the last 12 months.

(RSEO: Washington International Studies Council)

- 2 All actions taken had been documented and success indicators in the action plan had been either met or were well on the way to being met.

It is evident that the College implemented in a timely manner all actions on issues raised in the review and evaluated the identified success indicators as far as possible at this stage

(REO: UK College of Business and Computing Ltd)

- 3 Actions had been taken to improve the student experience outside of the action plan: providers had not limited themselves only to the actions in the action plan but had looked beyond the plan for further improvements.

In addition to the actions specified in the original action plan concerning points of good practice, the Trust has responded to student feedback by embarking on a fundamental restructuring of its student handbooks.

(REO: Tavistock and Portman NHS Foundation Trust)

B3: Learning and Teaching

The prevalence of comments in monitoring reports relates to the prevalence of good practice and recommendations identified in this area in the 2012 reviews. However, it is notable that providers have undertaken considerable work in this area, and have enhanced their provision.

KIC has built further on the good practice identified in the 2012 review report... The Learning Teaching and Assessment strategy, supported by the work of CLIQ, has been embedded in the majority of the colleges, particularly with regard to the development of technology-supported learning.

(ECREO: Kaplan International Colleges)

Here again, for providers who received commendable outcomes, reviewers found that all actions related to teaching and learning had been completed and, frequently, their impact had been evaluated.

A new learning and teaching strategy has been agreed and implemented after full consultation with staff. Evaluation has indicated a successful impact on programme delivery, monitored by a newly appointed Associate Dean and the Quality Assurance and Engagement Manager.

(REO: Kaplan Holborn College)

B4: Enabling Student Development and Achievement

Student support was an area of strength identified in the educational oversight reviews, often identified as good practice, but providers making commendable progress have also enhanced their already good work in this area. Resources have been enhanced or expanded. Providers have engaged more with industry partners to enhance students' learning opportunities. Providers have also improved their annual monitoring procedures to better identify and support enhancements to teaching and learning.

[The Centre] has enhanced its team of well-qualified and professionally experienced staff... The Centre has reinforced these enhancements by increasing the number of visiting speakers, upgrading key resources and adding to the range of external performance venues... The Centre has enhanced the Summer Review process by making explicit reference to the management of academic standards, learning opportunities and information.

(REO: London Centre of Contemporary Music)

B6: Assessment of Students

The overall commendable progress being made against action plans also typically features in relation to the assessment of students. Assessment processes have been made more rigorous, by introducing more formal processes for setting and marking assignments, and more robust internal verification of marks. Students are also better supported to undertake formal assessments through the use of opportunities for formative feedback.

The College is making commendable progress in implementing the advisable actions identified in the action plan. It has reviewed assessment processes, with two 'mini-mocks' replacing two standard written assignments. This action better prepares students for summative assessment.

(REO: Middlesex College of Law)

B8: Programme Monitoring and Review

Consistent with the general theme in 'commendable' reviews, providers have built on their proven strengths in programme monitoring and review and then enhanced them. Improvements have been made in the formal recording of deliberative committees, and in the way the provider takes oversight of programme monitoring and review processes.

Arrangements to enhance oversight and enable more effective monitoring of the provision are apt and involve staff at all levels. The phased Internal Subject Review of Business clearly identifies enhancement opportunities and recommendations.

(REO: Amity Global Education Ltd t/a Amity University [in] London)

B5: Student Engagement

This was an area where reviewers found significant progress had been made, possibly as a result of the increasing emphasis being given to the 'student' voice in the annual monitoring process. Even where there are small student numbers, or students study on courses less than a year in duration, providers have made significant attempts to improve student engagement.

While recruiting student representatives has proved challenging...the provider has demonstrated commitment to strengthening the system... The representative role is...critical to the newly-established mid-session student evaluations, where representatives, having consulted their constituents, submit mid-session evaluations of courses and lecturers. These reports are conscientiously discussed and followed up. Both students and staff welcome the system as it benefits existing, as well as future students.

(RSEO: IES Abroad, London)

C: Information about Learning Opportunities

Providers deemed to be making commendable progress often had improved the robustness of their public information by implementing more rigorous procedures for checking and monitoring the quality of information. Providers have also updated information on their websites and made it clearer and more accessible for potential as well as current students.

The policy for information is now being implemented with clear mechanisms for the management of both internal and external facing information. Increasing use is being made of the virtual learning environment, which students and staff find helpful.

(REO: Bristol Baptist College)

Themes arising from acceptable outcomes

General Themes

The majority of providers (64 per cent) were making acceptable progress. As would be expected though, typically, reports where the judgement was that acceptable progress was being made showed less progress against the action plans than was the case for commendable reports. Usually, while most action plan points had been considered and responded to there would be some instances where either insufficient or limited action had been taken. Reviewers' comments frequently make reference to making some progress or continuing to work on particular actions. Also little attention had been given to actions to further enhance the student experience outside those listed in the action plan.

B3: Learning and Teaching

Reviewers' comments on teaching and learning aspects of the review were variable but usually reflected incomplete actions, where an action had been initiated but had not yet been fully implemented or embedded across the provider.

A more systematic approach to the management of learning and teaching is in place, although the strategy has not yet been fully embedded.

(REO: Spurgeon's College)

Other reports highlight where a provider has identified that their actions could be further improved.

A teaching observation system has been introduced. The process requires the observation of part of a lecture and concentrates mainly on presentation. The College recognises that clearer reference to the stated aims and outcomes of the session and links with module and course learning outcomes would enhance this process.

(REO: College of Naturopathic Medicine)

B4: Enabling Student Development and Achievement

Student support was seen to be a strong feature of good practice in the educational oversight review reports and this continues in acceptable annual monitoring reports with progress generally being judged as good. Students too saw the level of support they receive as good.

The level of support for students was recognised as a feature of good practice in the last review. This support has been reinforced subsequently with the production of a faculty guidance note and a review of the Academic Policy Manual. Students spoke in very positive terms about the commitment and enthusiasm of faculty and the level of support available to them.

(RSEO: EUSA)

However, progress was sometimes slower than the reviewers thought appropriate:

The College has made some progress on providing adequate learning resources for staff and students. Students appreciate the improvement in provision of library texts and e-journals... The development of the virtual learning environment has been slow but the intention is that the content and staff training will have made notable progress by the end of 2013.

(REO: London Valley College Ltd t/a Lea Valley College)

B6: Assessment of Students

In line with the general findings, reviewers' comments about progress in the assessment of students showed action being taken, but in some cases these were not completed actions or with limited assessment of impact. However, despite this, reviewers were content that sufficient progress was being made to secure academic standards.

Assessment regulations are in place at all ISCs and most were clearly and fully set out in staff and student handbooks. In two cases, however, the regulations are inadequate in their scope and/or not fully communicated to students. Academic requirements for progression to programmes in partner higher education institutions (HEIs) are not always clearly set out, and some students reported that they had not been made aware of them until after their arrival.

(ECREO: Bellerbys Educational Services Ltd)

B8: Programme Monitoring and Review

In this area, the general conclusion for providers making acceptable progress was that more work was needed. Many comments refer to progress being made, but nearly all added that more work was required before a suitable programme monitoring and review process was in place. More work is needed across the sector to improve annual programme monitoring and review processes.

The College has made some progress in developing a consolidated annual review and action plan. However, the annual review report for 2011-12 provides only general information about College provision and is not yet suitable for use as part of an annual review process.

(REO: Zaskin College)

B5: Student Engagement

In terms of student engagement, providers making acceptable progress have frequently made good progress in extending student engagement, again possibly due to the increased importance being given to students' views. More formal student representative systems have been introduced, and providers have in some cases worked with their University partners to jointly strengthen student engagement at the provider.

Student engagement in College decision-making has been extended; a Student Committee has been established and there is now student representation on the Quality Assurance and Standards Committee.

(REO: Leicester Commercial College)

There has been a strengthening of the way in which student representation is implemented... Student representatives are now elected to the student forum and trained within PUIC and now also receive additional training from Plymouth University Students' Union. Students now serve on the Learning and Teaching Committee and are full members of the University Students' Union, where they are in the process of forming their own student society. A College Enhancement Task Force has been established, although it has met only once, so its effectiveness cannot yet be judged.

(ECREO: Navitas UK Holding Ltd: Plymouth University International centre)

C: Information

Consistent progress in this area was seen for the significant majority of providers making acceptable progress. There was frequent action being taken to update handbooks, policies and to improve the process for ensuring the accuracy of all information, particularly web-based information.

'The College has enhanced its website and established a policy on the use of social media. It has introduced an accessible and user-friendly virtual learning environment, which it has underpinned with training and development, and which it will formally evaluate. It has reviewed its information policy, which now specifies responsibilities for signing-off printed and electronic information, and for document version control; this review was aided by informal student contributions. It has plans to obtain feedback on the quality of its public information in a review in which it will involve a range of stakeholders.

(REO: London College of International Business Studies Ltd)

Themes arising from 'requires improvement' outcomes

General Themes

Less than 10 per cent of providers were judged as requiring improvement or making unacceptable progress. Uniquely for this set of reports the annual monitoring occasionally showed that there were no students being taught at the time of the review visit, and so some providers had not implemented the action plan fully, as many actions rely on students being present. In such cases, reviewers assess whether the provider had made such progress as it is able to, given the circumstances. For example, policies and processes can be reviewed and updated or improved, but the provider would not be able to assess the effectiveness of these changes until it has the opportunity to implement its revised procedures.

In the context of the difficulties described above, annual monitoring reviews providers requiring improvement typically shows 'variable' or 'limited' progress against the action plan, or that progress was often not properly monitored or evaluated.

The College has taken some actions in response to the recommendations contained in the action plan, but these actions do not always fully address the issues raised and improvements are not yet fully implemented.

(REO: UK Business Academy)

Where a provider has made some progress, further work is needed to fully secure the area of concern.

The School website is structurally much improved. However, the School recognises that its processes could be more effective in identifying information that is misleading and the problems that can occur if a website review is not conducted.

(REO: Bedfordian Business School)

B3: Learning and Teaching

There are examples of slow progress being made, or where the actions have not fully addressed the recommendations of the previous review. Most comments relate to the provider's oversight of learning and teaching, particularly with reference to formal teaching observations or appropriate staff development.

Progress regarding encouragement of greater staff engagement with professional development opportunities is slow. There has been little progress on implementing peer reviews, with only a limited number having taken place prior to this visit. The College still does not have a formal policy on staff development. Although a small number of staff development sessions have been offered, there is no evidence that this is aligned with the action plan or is informed by external reference points.

(REO: Magna Carta College)

B4: Enabling Student Development and Achievement

In contrast with other areas, but in keeping with the findings of the educational oversight review reports, even failing providers generally showed good levels of both academic and pastoral student support.

Good practice has been sustained. Much of the module to support study skills development is integrated into the teaching of the students' main programme. Students are positive about the highly responsive and supportive teaching and guidance.

(REO: Swiss School of Management Ltd)

B6: Assessment of Students

Responses here are varied. In some cases progress has been made, but consistently the action has not been seen through. Risks are identified to the integrity of the assessment process, particularly in regard to identification of student misconduct and to the effectiveness of internal verification of marking.

The College has produced a policy document on plagiarism and collusion and publicised some awarding body guidance on plagiarism ... However, the new policy and procedures are not yet fully consistent with the information about plagiarism contained in the student handbook and the policy statement does not address other forms of unfair practice, such as cheating in examinations... More work is needed to ensure that the proposed procedures to deal with plagiarism and unfair practice are comprehensive, consistent with information provided to students, and align with the management structure for higher education provision at the College.

(REO: City of London Business College)

B8: Programme Monitoring and Review

Providers have taken some steps to address recommendations relating to programme monitoring and review. However, these have not typically been fully formulated or implemented.

The Centre has made limited progress on the recommendations contained in the action plan. The Academic Committee structure has been revised with indicative lines of reporting. However, the terms of reference/responsibilities for each committee are incomplete and lack specific detail. Minutes of meetings specify topics discussed but are informal and there are no action plans or evidence of issues raised being followed through.

(REO: Centre for Teaching in Management)

B5: Student Engagement

There is a mixed set of comments for this aspect of the Quality Code but with less overall criticism. Progress is typically judged as acceptable, but the effectiveness of the mechanisms introduced has not been fully evaluated.

Actions to improve the response rates from student feedback mechanisms include SMS, emails and face-to-face reminders in class. The impact of these approaches has not been evaluated.

(REO: Brit College Ltd)

C: Information

For providers requiring improvement there were frequent critical comments about the accuracy of the public information. In some cases, providers had produced policies for the checking and monitoring of information, but had not implemented them. In other cases, the provider's systems remain ineffective at identifying inaccuracies.

The College has given attention to its control framework for public information but this has had limited impact. It has planned a College Public Information Panel, but the supporting documentation needs a clear statement on the panel's terms of reference and operational procedures. The College is in the process of updating its prospectus. The team consider that the nature of the relationship with Association of Chartered Certified Accountants (ACCA), and that with UK higher education institutions referred to in the draft prospectus, is insufficiently explicit in the College's published information.

(REO: North London College)

Providers' use of external reference points, including the Quality Code

There is a clear difference in progress in using and embedding the Quality Code between providers who were judged as making commendable progress, acceptable progress or required to improve. In the first of these, providers were frequently described as making significant progress and were engaging effectively with the Quality Code.

The College has demonstrated highly effective engagement with the Quality Code through a careful mapping of published Chapters against College policy and practice. The outcomes of the mapping exercise have been shared with staff at all levels. College staff demonstrate an informed awareness of the Quality Code.

(REO: BIMM, Brighton and Bristol)

However for providers making acceptable progress there was less use of the Quality Code or widespread engagement with it. Academic staff demonstrated limited awareness of the Quality Code. The need for the provider to further engage with, and embed the expectations of the Quality Code into their own policies and procedures, was noted.

The Academy is aware of the need to refocus on different external reference points, particularly the UK Quality Code for Higher Education (the Quality Code), and has made acceptable progress in this regard. Senior staff are familiar with the Quality Code and have introduced it to the staff to raise awareness. There is now a need to embed the use of the Quality Code and its indicators in the ongoing management of the provision.

(REO: London Empire Academy)

The position is significantly worse for those providers whose progress was judged to require improvement. For these providers engagement with the Quality Code is typically quite limited and reviewers noted that some providers had yet to engage with the Quality Code or had no direct engagement with it.

The Centre has yet to align its policies and procedures with the UK Quality Code for Higher Education (the Quality Code), but has intentions to do so. Despite being a recommendation in the action plan, the Centre's engagement with the Quality Code is at a very early stage of development and the Centre has yet to demonstrate that it is familiar with the content of the Quality Code. It is also unclear how the Quality Code will be implemented.

(REO: Centre for Teaching in Management Limited)

Conclusion

Progress with implementing the action plan from the previous review

The success rate for annual monitoring is very high, at over 90 per cent. All providers have met at least some of the aims of their action plans with the best providers exceeding them. However there is still a proven need for repeated annual monitoring as only just over one in four providers was making commendable progress. The annual monitoring review has served a valuable role in ensuring that providers have followed up on their actions plans and therefore is a critical element in underpinning continual improvement in the maintenance of academic standards and quality, and in supporting the ongoing enhancement of the student learning experience.

Developments in Student Engagement

One aspect that the results of annual monitoring reviews clearly shows is the very considerable effort providers have been putting in to ensuring that the student voice is more obviously heard and responded to. The 'Educational Oversight: One Year On' report noted that student engagement was 'recognised by some providers as an important feature of quality assurance management' but that 'mechanisms were frequently underdeveloped and required (sometimes immediate) actions'. Across all annual monitoring reviews some progress was noted and progress was generally judged as at least acceptable in this area.

Progress in engaging with the Quality Code

Progress in working with the Quality Code is highly variable. In the best of providers progress is seen as highly effective and such providers are making commendable efforts to engage with the Quality Code across all its parts and chapters. In the weaker providers engagement is limited and some have yet to align their processes with the Quality Code or produce evidence of working with the Quality Code. Across all providers, though, it is certainly the case that the Quality Code is having a significant impact on the standards and quality of higher education being delivered.

Next Steps

For providers undergoing their second annual monitoring visit, the process focuses more heavily on the provider's ability to routinely monitor and evaluate their management of their higher education provision, in order to effectively identify their own good practice and areas for improvement. In 2015, there will be an additional focus in monitoring visits on the areas deemed to be of most significant risk to academic standards and quality. These are the management of admissions and the management of assessment.

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