Higher Education Review (Embedded Colleges) of The University of Nottingham International College

March 2018

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About this review

This is a report of a Higher Education Review (Embedded Colleges) conducted by the Quality Assurance Agency for Higher Education (QAA) at Kaplan International Colleges UK Ltd, The University of Nottingham International College. The review took place from 13 to 14 March 2018 and was conducted by a team of two reviewers, as follows:

Ms Brenda Eade
Mrs Catherine Fairhurst.

The main purpose of the review was to investigate the higher education provision and to make judgements as to whether or not academic standards and quality meet UK

Explanation of findings

This section explains the review findings in greater detail.

1 Judgement: The maintenance of the academic standards of awards offered by the provider

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

a) ensure that the requirements of

1.4 The processes for aligning qualifications to the appropriate framework, for the award of credit, and for referencing Subject Benchmark Statements would enable the Expectation to be met.

1.5 To test the operation of these arrangements the review team scrutinised a range of documentation relating to academic standards and quality assurance, including the QAF, the ASQM, programme documentation (programme and module specifications) and an example of a programme approval process. The review team also met staff from the College, the University and Kaplan International Pathways.

1.6 The review team found that the programmes delivered by the College conform to the Kaplan International Pathways qualifications framework (QAF) and are developed in accordance with the procedures set out in the ASQM. The University has an input into programme design through the Joint Academic Board (JAB), providing a further external reference point for the qualifications. This ensures that the College pathways are designed to enable students to progress to the relevant University programme.

1.7 The Foundation Certificate programmes are aligned to level 3 of the Regulated Qualifications Framework (RQF), which enables students to enter level 4 of the relevant undergraduate programmes at the University. The pre-master's programmes are aligned with level B2 of the Common European Framework of Reference for Languages (CEFR) and provide the necessary entry criteria for the University's postgraduate programmes. Full details of the progression arrangements

Expectation (A2.1): In order to secure their academic standards, degree-awarding bodies establish transparent and comprehensive

onto the relevant University Programme. It helps to ensure that there is a close relationship between the University and the College. The JSB has met twice and considers the key performance indicators and strategic issues such as marketing and recruitment. The SMT monitors the performance of the College, including standards and quality, at the operational level

1.19 The review team found that, although there are frequent meetings with students, there has been only one meeting of the Programme Committee. This is contrary to the Terms of Reference set out in the Kaplan International Pathways Governance Framework which state that normally the committee will meet once per term. Staff indicated that there are separate Programme Committees for each pathway, but the minutes of the meeting refer to all pathways, and do not record who attended the meeting nor do they provide full details of the discussion which took place. Furthermore, the APR has not been considered by the Programme Committee (further discussed in Expectation B8).The review team **recommends** that the College ensures that the membership of the deliberative committees, the frequency of meetings and the format of minutes are in line with the terms of reference, to facilitate full staff and student participation in the governance of the College.

1.20 Although there is a minor weakness in the implementation of programme committees, as outlined above,

Expectation (A2.2): Degree-awarding bodies maintain a definitive record of each programme and qualification that they approve (and of subsequent

and oversight of these processes by Kaplan International Pathways. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

1.29 The QAF and the Curriculum Development Process define Kaplan International Pathways' principles of programme design and approval. The key focus of the Approval Group (NPDAG) is on the outcomes of the Product Review (Kaplan International Pathways' review of its offering). BAGPD and NPDAG consider any marketing, recruitment, financial, academic and compliance implications of new or changed programme proposals. The QAF maps academic frameworks to undergraduate and postgraduate awards. Kaplan International Pathways uses the RQF and FHEQ as the external reference points for the QAF. Kaplan International Pathways' intranet, with all staff access, contains links to appropriate QAA Subject Benchmark Statements. Academic approval takes place through the APQC and by the JAB at College level. The ASQM describes the process for the approval of taught programmes. The College has responsibility for implementing these processes. There is a formal procedure for course closure.

1.30 Kaplan International Pathways has designed programme approval procedures to ensure that academic standards are set at a level that meets UK threshold standards and are in accordance with relevant academic frameworks and regulations. The arrangements in place would enable the Expectation to be met.

1.31 The review team tested the operation of these arrangements through scrutiny of a range of documentation relating to quality, including programme approval documents and minutes of College meetings. The review team also met staff of the College, Kaplan International Pathways and the University.

1.32 The College's action plan clearly identifies programme development and approval processes. A recent example of programme approval and documentation for the new arts and humanities pathway on the Business, Law and Social Sciences Foundation Certificate demonstrates that the processes described above operate effectively and as intended. Kaplan International Pathways and the College pay strict attention to standards throughout the preparation and approval of new programmes. Kaplan International Pathways has designed and the College applies programme approval policies and processes to ensure the alignment of content and assessment with the UK threshold standards contained within the FHEQ. The minutes show that the JAB, chaired by the University gives formal academic approval to confirm that the programme prepares students effectively for future University study.

1.33 The external examiner's report template requires a comment on the alignment of the level of the award with the FHEQ and Subject Benchmark Statements. The external examiner's first report in 2017 identifies that this area is satisfactory.

1.34 The review team concludes that the application of Kaplan International Pathways' policies and processes for programme approval ensures that academic standards are set at

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

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

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

Findings

1.35 The APQC is responsible for monitoring the consistency of academic quality and comparability of standards across all Kaplan Pathways Colleges. The Kaplan Graduate Performance at Host Partner Universities report and the annual report on the ASQP report presented to APQC compare the performance and progression rates of student cohorts, modules, programmes and colleges. This level of analysis contributes to the assuring of academic standards.

1.36 The programme approval procedures consider learning outcomes and their assessment to ensure alignment with threshold standards. Programme and module specifications state the programme learning outcomes that are defined in the QAF. The ASQM details Kaplan International Pathways' assessment principles and regulations. A college Assessment Board ensures the award of credit is awarded only where both UK threshold standards and Kaplan International Pathways' academic standards have been satisfied. Kaplan International Pathways provides a guide for colleges on establishing alternative assessment arrangements for students with disabilities.

1.37 The College is responsible for securing academic standards through setting, marking, moderation and feedback of all assessment except for the centrally managed English Language Exit module.

1.38 The policies and regulations in place would enable the Expectation to be met.

1.39 To test the operation of these arrangements the review team considered a range of evidence (including programme and module specifications, Kaplan International Pathways' quality manuals and the external examiners' reports). The review team also met staff from the College and the University.

1.40 The College undertakes assessment according to Kaplan International Pathways' assessment principles and regulations. The external examiner's report confirms that the learning outcomes are satisfactorily in accordance with the FHEQ and Subject Benchmark Statements.

1.41 Students are able to demonstrate achievement of the learning outcomes through varied modes of assessment. Assessment briefs clearly define grading criteria. The clearly expressed Student Facing Assessment Rules and Regulations document is available on the virtual learning environment (VLE) and students say they are also made aware of the regulations by their tutors.

1.42 A formally constituted Assessment Board decides outcomes for each student. This is chaired by the Academic Director and attended by the external examiner and the College

Director, which ensures consistency. The minutes demonstrate that student achievement is calibrated relative to the threshold standard consistently and systematically.

1.43 The College is able to make appropriate reasonable adjustments to assessment modes where required to avoid the risk of disadvantage to students with protected characteristics (examples were provided of extra time, a separate examination room and provision of a laptop).

1.44 The review team concludes that the students' achievement of the learning objectives of their programme is demonstrated through assessment. These decisions are reached through the formally constituted assessment boards. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

1.58 The external examiners are members of the Assessment Boards and provide impartial advice and recommendations as to whether the assessments demonstrate that academic standards are achieved. Their reports confirm that programmes adhere to relevant professional and regulatory standards and benchmarks.

1.59 The review team conclude

The maintenance of the academic standards of awards offered by the provider: Summary of findings

1.60 In reaching its judgement, the review team considered its findings against the criteria specified in Annex 2 of the published handbook.

1.61 All Expectations in this area are met and the associated level of risk is low in all cases.

1.62 The College has appropriate procedures for ensuring academic standards, which are aligned with Kaplan International Pathways policies and procedures. There are effective arrangements in place for the management of the quality of programmes, in partnership with the University.

1.63 There is one recommendation in this judgement area, in Expectation A2.1, that the College should ensure that the membership of the deliberative committees, the frequency of meetings and the format of minutes are in line with the terms of reference, to facilitate full staff and student participation in the governance of the College.

1.64 The review team found that there was some lack of clarity about the number of programme committees and the frequency of meetings, and that the minutes of the programme committee meeting that had taken place lacked formality and detail. The recommendation concerns minor oversights in the College's governance arrangements which do not present any serious risks to the management of academic standards.

1.65 The review team concludes that the maintenance of the academic standards of awards offered by the College **meets** UK expectations.

2.7 With the oversight of CLIQ and the University, the College operates effective processes for the design, development and approval of programmes to enhance the quality of learning opportunities. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

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

Findings

2.8 Recruitment, selection and admission is managed centrally by Kaplan International Pathways

week of study. They are able to provide feedback on the admissions processes via the arrival survey which is now linked back to agents to enable the College to evaluate their role in admissions.

2.16 The suitability of the entry criteria is currently monitored by tracking student performance on their pathway programmes. The College is working with the University to obtain more data on student performance once they have progressed to their University programme and this will enable an evaluation of the entry criteria. Kaplan International Pathways has undertaken several admissions monitoring activities such as analysing student performance in relation to start dates. It is intended to further extend the tracking processes to obtain performance data about students once they have graduated.

2.17 Retention and progression data provided by the College indicates that students are able to complete their programmes of study and successfully progress to their University pathway.

2.18 Academic staff are provided with an overview of the role of admissions, for example at the Kaplan International Pathways Leadership and Management programme. Kaplan International Pathways has a training policy for admissions staff that includes maintaining a log of the training each member of staff has undertaken.

2.19 Overseas agents are appointed to recruit students in their home country. The appointment of a new agent is subject to due diligence activities undertaken by the wider Kaplan International Pathways group. Training is provided for all agents through the Kaplan International Pathways 'on-boarding' process. Many agents who are employed by Kaplan International Pathways also work for the partner university, which enables them to have an overview of the student journey from entry to the pathway programme to the completion of the university course. During 2017, Kaplan International Pathways ran a Priority Agent Familiarisation visit which enabled overseas agents to visit some of the pathway colleges and update their knowledge of the UK education system.

2.20 Kaplan International Pathways has a process for programme closure that includes procedures for supporting students who have already been made an offer for a programme that will no longer be offered. At the time of the review visit no programmes had been closed.

2.21 Effective communication between the admissions team and College staff enables the College to respond to changes in the pattern of recruitment, in terms of resources, and ensures the admissions team are aware of any changes to pathways.

2.22 The review team concludes that the centralised admissions process, which adheres to the principles of fair admission, is transparent, reliable, valid and inclusive, and is effectively implemented for the recruitment and admission of students to the College. Meetings with admissions staff, College academic and support staff and students confirmed that the procedures and policies in place support the selection of students who are able to successfully complete their programmes and progress to the University. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

Graduate Attributes which encourages students to evidence the skills they have developed while at the College. Students confirm that they feel well prepared for their University programme and find it easy to integrate into the University on completion of their international pathway programme.

2.46 The College has developed a good working relationship with the University and this helps to ensure smooth progression of students as well as providing opportunities for staff to access University resources and staff development. The close working relationship with the University, which ensures the smooth progression of students to their chosen programme and allows staff to access resources and development opportunities within the University, is **good practice**.

2.47 Pathway programmes provide progression to a number of university degrees. A small number of Law students from the previous cohort were unable to progress to their Law programme at the University as they did not reach the required threshold on the Law National Aptitude Test (LNAT), an external test which is a requirement for Law courses. The College is working closely with the University link tutor to provide extra support to help students to pass the test. As modules are common across several pathway programmes, students who do not pass the test can opt to join an alternative programme at the University. Students who do not meet the entry criteria for their chosen course at the University can use the Kaplan International Pathways University Placement Service (UPS), which supports them to find an alternative University programme.

2.48 The review team concludes that the comprehensive support and resources, which have an international focus and are tailored to the individual needs of students, enable students to develop their academic personal and professional potential and to successfully progress to their University pathway. There are extensive processes in place for oversight and monitoring of these services, through Kaplan International Pathways and the University. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

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

Quality Code, *Chapter B5: Student Engagement*

Findings

2.49 The College is responsible for student engagement based on Kaplan International Pathways' policy, detailed in the ASQM. Colleges appoint and train student representatives to gather views of other students, and disseminate information. A summary of the findings of student feedback is included in the APR, which is considered by the Programme Committee. Kaplan International Pathways uses various methods for eliciting student views including focus groups, formal staff and student forums, use of student representatives on Programme Committees, student representatives' feedback to senior management, feedback boxes, and email surveys and questionnaires.

2.62 The College uses assessment procedures that are fully aligned with Kaplan-e9dD8Q]TJETBT>BDC

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

Quality Code, *Chapter B7: External Examining*

Findings

2.63 Kaplan International Pathways has explicit policies and regulations for the appointment of independent external examiners. One external examiner operating across colleges is responsible for the English Language Exit module. College Programme Leaders formally nominate their external examiner who is then approved by JAB. The ASQM defines the roles and responsibilities of examiners. There is an external examiners' handbook available for guidance. The external examiners are members of the College's assessment board where decisions are made on the conferment of awards.

2.64 Kaplan International Pathways' external examiners' report template requires them to comment and to indicate satisfaction or dissatisfaction with academic standards, assessment processes and the comparability of standards with other similar institutions. There is a section within the report to identify good practice. The College's Programme Leader is responsible for providing a formal response to the external examiner's comments. The external examiner's report is included in an annex to the Annual Programme Report. Kaplan International Pathways has oversight through the ASQP report and the University through JAB.

2.65 These arrangements, including Kaplan International Pathways' central policies and oversight procedures, would enable the Expectation to be met.

2.66 The review team tested their operation by scrutinising documentation including Kaplan International Pathways' policies and procedures, ASQP, APR and external examiners' reports and JAB minutes. The review team also met staff from the College, Kaplan International Pathways and the University, and students.

2.67 The College uses two external examiners for its programmes to secure academic standards. They are appointed according to the ASQM defined criteria and are confirmed by JAB. The appointment procedure demonstrates that they are able to give impartial and independent advice on the assessment processes, the academic standards and student achievement. Their reports on Kaplan International Pathways' templates show that external examiners are satisfied that they receive appropriate information on assessment and external examining procedures and practices, and assessment regulations from the College. The Programme Leader responds to their comments within the template.

2.68 The external examiners receive assignment briefs and questions in advance of the assessment although the College does not send them samples of students' completed work. The external examiners scrutinise students' assessed work at the Assessment Board visit and give a verbal report. The College emphasised the extensive email communication and the helpful detailed discussions which take place at these visits.

2.69 There is very little detail in the external examiners' written reports. In particular the Business, Law and Social Science report predominantly notes 'satisfactory' with very brief comments in only two sections of the eleven provided. The review team was told that external examiners make detailed verbal comments at visits, however the review team noted that these are not formally recorded and that Assessment Board minutes include only brief comments. In order to meet the specific needs of the College and to assure academic

standards it is **recommended** that the College work with external examiners to ensure that they include in their reports more detailed informative comment on the outcomes of assessment.

2.70 The College considers the external examiners' reports through the APR and the University through JAB. Although the students say they are not aware of it, the VLE contains full details of the external examiners and their reports.

2.71 In reaching its conclusion on this Expectation, the review team noted that Kaplan International Pathways' procedures for the use of external examiners are generally appropriate but that there are shortcomings in the rigour with which they are applied at the College. The review team also took account of the relatively short period over which the College has operated. The College and Kaplan International Pathways acknowledged the issue of the quality of external examiners' reports at the visit and identified it as an area requiring action. The Expectation is met and the associated level of risk is low.

Expectation: Met
Level of risk: Low

to the process. The review team considers that this will demonstrate transparent effective processes for programme monitoring so that learning opportunities for students may be

The quality of student learning opportunities: Summary of findings

2.92 In reaching its judgement, the review team considered its findings against the criteria specified in Annex 2 of the published handbook

3 Judgement: The quality of the information about learning opportunities

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

Quality Code, Part C: Information about Higher Education Provision

Findings

3.1 Kaplan International Pathways has a public information policy that covers the production of the prospectus and the provision of other information for students, including the website. There is a nine-stage process for producing and signing off information contained in the prospectus. This includes design, content and checking the use of the University and Kaplan logos.

3.2 Formal Agreements between Kaplan International Pathways and the University,

3.10 Feedback from students about the information provided by the College is collected through the Arrival Survey and the Module Questionnaire. The accuracy and appropriateness of information provided by the College is also discussed at meetings with student representatives.

3.11 On completion of their pathway programme, students receive a transcript setting

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

3.14 In reaching its judgement, the review team considered its findings against the criteria specified in Annex 2 of the published handbook

3.15 The Expectation in this

Glossary

This glossary is a quick-reference guide to terms in this report that may be unfamiliar to some readers. Definitions of key operational terms are also given on pages 24-27 of the Higher Education Review (Embedded Colleges) handbook.

User-friendly explanations of a wide range of terms can be found in the longer Glossary on the QAA website: www.qaa.ac.uk/glossary.

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

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

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

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

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

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

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

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

e-learning
See technology enhanced or enabled learning.

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

term in our review processes.

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

Flexible and distributed learning
A programme or module that does not require the student to attend classes or events at particular times and locations. See also **distance learning**.

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

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

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

Learning opportunities

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.

Self-evaluation document
A report submitted by a higher education provider, assessing its own performance, to be used as evidence in a QAA review.

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

Technology enhanced or enabled learning (or **e-learning**)
Learning that is delivered or supported through the use of technology.

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

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

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

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